EXECUTIVE SUMMARY

1. PURPOSE OF THE EIR

The County of San Luis Obispo (County), as the Lead Agency under the California Environmental Quality Act (CEQA), has prepared this Environmental Impact Report (EIR) to assess the impacts that would result from the approval of the proposed Dana Reserve Specific Plan project (DRSP; project). This EIR will serve as a public information document to be used by the general public, responsible and trustee agencies, and decision-making bodies to review and evaluate the environmental effects associated with the project, potential mitigation measures recommended to address or minimize those effects, and reasonable alternatives to the project. The review process gives both agencies and individuals an opportunity to share expertise, discuss agency analyses, check for accuracy, detect omissions, discover public concerns, and solicit mitigation measures and alternatives capable of avoiding or reducing the significant effects of the project while still attaining most of the basic objectives of the project.

The remainder of the Executive Summary consists of the following sections:

- A brief description of the project location;
- A summary of the project background and objectives;
- A summary of key impacts and mitigation measures associated with the project;
- A summary of the known areas of controversy; and
- A summary of project alternatives and the environmentally superior alternative.

2. PROJECT LOCATION

For purposes of this EIR, the project site includes the Specific Plan Area and off-site areas where project-related transportation, water system, and wastewater system improvements would occur. The DRSP project site and associated off-site improvement areas are located within the southwestern portion of unincorporated San Luis Obispo County, California. The Specific Plan Area is located adjacent to the northern boundary of the Nipomo urban reserve line (URL) and directly west of U.S. Route 101 (US 101). The Specific Plan Area consists of three adjoining parcels—Assessor's Parcel Numbers (APNs) 091-301-030, 091-301-031, and 091-301-073—totaling approximately 288 acres. The main parcel is APN 091-301-073, which underlies the majority of the Specific Plan Area and is 274.4 acres in size. The remaining parcels (APNs 091-301-030 and 091-301-031) connect the main parcel to Willow Road and are approximately 7.7 and 7.2 acres in size, respectively. Off-site transportation, water system, and wastewater system improvement areas would be located along existing roadways and/or within other previously developed areas within the vicinity of the Specific Plan Area (see Chapter 2, *Project Description*, for the full description of proposed off-site improvement areas). The project also includes the off-site dedication of an open space and conservation easement on a property known as Dana Ridge (APNs 090-031-003 and 090-031-004), located approximately 2.1 miles east of the project site.

3. PROJECT BACKGROUND AND OVERVIEW

The *County of San Luis Obispo General Plan* identifies the main project parcel as the Cañada Ranch Specific Plan area, which is subject to preparation and adoption of a Specific Plan prior to annexation of the site into the Nipomo URL. A Specific Plan is a planning tool that allows a county/community to provide a framework and vision for future development of a defined area. The property is designated as

an expansion area under the South County Area Plan (Sections 4.5 and 4.8) as well as the San Luis Obispo County Code (Inland) – Title 22, Land Use Ordinance (LUO) (Section 22.98.072). Per the County LUO, a Specific Plan shall be prepared for the Cañada Ranch property and shall comply with the following provisions:

a. **Types of uses.** The concept of a Specific Plan is for uses in the following priority for acreage, scale and intensity:
    (1) Open space uses within the oak woodlands;
    (2) Industrial park(s) that will generate "basic" employment for the Nipomo and south county area;
    (3) Commercial service parks that do not conflict with downtown and community shopping commercial uses within Nipomo;
    (4) Retail uses to serve the daily shopping needs of employees and residents of the site in compliance with purpose and character statements for neighborhood shopping areas in Framework for Planning - Inland Area;
    (5) Commercial retail uses that are in compliance with purpose and character statements in Framework for Planning - Inland Area for highway-oriented retail;
    (6) Residential areas to contain a mix of housing unit types, a portion of which should be affordable to average employee incomes on the site, timing to be concurrent with or following establishment and operation of nonresidential uses, the timing to be determined by a market feasibility study.

b. **Oak habitat preservation.** Designation of the existing oak forest habitat for open space preservation, where limited recreational and open space uses may be allowed.

c. **Pedestrian-oriented site planning.** Location of workplaces, shopping, services, civic buildings and residences in close proximity to each other to facilitate walking and alternative transportation to the private vehicle.

d. **Architecture and landscaping.** Guidelines for architecture and landscaping that respond to the rural character of the area.

e. **Resource, facility and services needs.** Extent of necessary public, or private where applicable, needs including, but not limited to, safety, health, waste management and water supply.

On June 24, 2020, the project applicant, Dana Reserve, LLC and NKT Development, LLC, submitted a draft Specific Plan and Vesting Tentative Tract Map (VTTM) to develop new residential, commercial, light industrial uses, and related improvements on the 288-acre Dana Reserve property (previously referred to as Cañada Ranch). The County also initiated a proposed General Plan Amendment to designate the Specific Plan Area as a single land use category (e.g., Specific Plan), which would refer to and incorporate the proposed Specific Plan and would also ensure consistency throughout the County's General Plan.

The DRSP would guide future development of the Specific Plan Area by defining land uses and development standards, circulation, parks and trails, and infrastructure for the future proposed residential, commercial, and open space uses. The DRSP would also provide a phasing/implementation plan and describe the public facility financing mechanisms available for the ongoing maintenance of public and private improvements required for the DRSP. Major components of the DRSP include:

- Land use and development standards for residential, commercial, and open space/recreational uses;
- Site and building design guidelines;
- Goals supporting a variety of housing types to allow a range of opportunities for home ownership or rental options;
- Establishment of north-to-south roadway connections through the Specific Plan Area to better connect Tefft Street and Pomeroy Road to Willow Road;
- Implementation of an interconnected network of walking, bicycling, and equestrian trails and facilities; and
- The generation of new employment opportunities and provision of access to day-to-day goods and services through development of a range of commercial uses.

The DRSP is a primarily residential project with over 75% of the Specific Plan Area designated for residential uses, which would accommodate up to 1,289 single-family and multi-family residential units. However, it identifies a mix of land uses within the Specific Plan Area to serve the new neighborhoods and surrounding community. The DRSP would allow for the future phased development of residential uses, village and flex commercial uses (including a hotel, educational/training facilities, and light industrial uses), open space, trails, and a public neighborhood park within the Specific Plan Area (Table ES-1; see Chapter 2, *Project Description*, for the full description of the proposed project).

Table ES-1. Project Overview

Land Use Zones	Acres[1]	Potential Units[1]	Potential Floor Area (square feet)
Residential Single-Family	149.5	831	
Residential Multi-Family	23.5	458	
Rural Residential (Existing)	10.0	N/A[2]	
Recreation/Public Park	11.0[3]		
Village and Flex Commercial[4]	22.3		110,000–203,000
Open Space, Trails, Basins	49.8		
Roads	21.9		
Total	**288**	**1,289**	**110,000–203,000**

[1] All acreage and potential units can be adjusted up to 10% to address site-specific constraints and more suitable site design, subject to County review.

[2] The Specific Plan Area includes two parcels between Cherokee Place and Willow Road (APNs 091-301-030 and 091-301-031) that are currently designated Residential Rural (RR). The DRSP does not propose to change the land use designation of these parcels or develop additional residential, commercial, or recreational uses within these parcels. They are included in the DRSP to provide connections for Collectors A and B from Cherokee Place to Willow Road. These roadway improvements are the only development proposed on these parcels; therefore, the identification of additional potential units is not applicable for these parcels.

[3] Minimum requirement.

[4] Proposed Commercial uses include a 60,000-sf hotel and a 30,000-sf educational/training facility.

4. PROJECT OBJECTIVES

Section 15124(b) of the State CEQA Guidelines requires a statement of a project's objectives, which includes the underlying purpose of the project, to guide the Lead Agency in developing a reasonable range of alternatives and aid decision makers in preparing findings. The objective of the DRSP is to develop a master-planned neighborhood intended to provide a diversity of housing types, generate new

employment opportunities, provide access to day-to-day goods and services, maintain the rural history and character of the property, and integrate a multimodal transportation network. The primary objectives of the DRSP project include:

1. To provide a mix of land uses that offers a range of amenities accessible to residents and community members.
2. To respect Old Town Nipomo, by providing a small, neighborhood-oriented village commercial area designed to complement, rather than compete with, Old Town Nipomo.
3. To provide a public neighborhood park, pocket parks, and open space areas within each residential neighborhood, linking the neighborhoods together through a network of trails and open spaces.
4. To incorporate the rural history of the community through architectural design.
5. To provide a diversity of housing types and opportunities for home ownership and rental, including affordable homes consistent with the goals and policies of the Housing Element of the General Plan, the County's Inclusionary Housing Ordinance, and regional housing needs.
6. To create new employment and job training opportunities for the community and the broader South San Luis Obispo County area.
7. To enhance circulation within the DRSP and existing community by continuing the existing public roadway network through the DRSP property to connect to Willow Road, providing a new Park and Ride lot to encourage carpooling, and creating new public transportation points of connection to facilitate public transit use and reduce single-occupant automobile use.
8. To integrate a network of walking, bicycling, and equestrian facilities to connect on-site residential neighborhoods and the broader community.
9. To maintain the large, centrally located oak woodland area as a site feature and to minimize impacts to special-status plants and animals on-site.
10. To meet the County Building Code requirements for energy efficiencies and water savings.
11. To reduce uncertainty in planning for and secure the orderly development of the Specific Plan Area.
12. To provide effective and efficient development of public facilities, infrastructure, and services appropriate for the Specific Plan Area.
13. To meet or exceed the requirements of the Nipomo Community Services District (NCSD) District Code to ensure that the DRSP constructs the water and wastewater infrastructure necessary to serve the project without adverse impacts on the NCSD's ability to serve existing and future users.

In addition to the above applicant-stated primary objectives of the DRSP, the County Board of Supervisors, on January 26, 2021, entered into a Memorandum of Understanding (MOU) with the applicant that states the project would have the following benefits to the County:

1. Implementing the County's stated land use goals.
2. Dedication of an open space easement, community park, and trail system.
3. Providing the County with anticipated increased sales tax, property tax, and transient occupancy tax revenues.
4. Providing for affordable housing in furtherance of the County's Housing Element and inclusionary housing goals and to assist in meeting the County's Regional Housing Needs Allocation (RHNA).
5. Providing a portion of the site to be developed as a business park, commercial area, or such related uses, in support of the County's further economic development.

6. Permanent conservation of 388 acres of oak woodlands or similar habitat located off-site.

5. SIGNIFICANT ENVIRONMENTAL IMPACTS IDENTIFIED

Section 15123(b)(1) of the State CEQA Guidelines requires identification of each significant effect with proposed mitigation measures and alternatives intended to reduce or avoid the effect. Impacts of the proposed project and alternatives have been classified using the categories described below:

- **Class I: Significant and unavoidable impacts.** Significant impacts that cannot be fully and effectively mitigated. No measures could be taken to avoid or reduce these adverse effects to insignificant or negligible levels.
- **Class II: Significant, but mitigable impacts.** These impacts are potentially similar in significance to those of significant, unavoidable, adverse impacts, but can be reduced or avoided by the implementation of mitigation measures.
- **Class III: Less than significant impacts.** Mitigation measures may still be required for these impacts as long as there is rough proportionality between the environmental impacts caused by the project and the mitigation measures imposed on the project.

The term "significance" is used throughout the EIR to characterize the magnitude of the projected impact. For the purpose of this EIR, a significant impact is a substantial or potentially substantial change to resources in the local proposed project area or the area adjacent to the proposed project. In the discussions of each issue area, thresholds are identified that are used to distinguish between significant and insignificant impacts. To the extent feasible, distinctions are also made between regional and local significance and short-term versus long-term duration. Where possible, measures have been identified to reduce project impacts to less-than-significant levels. CEQA requires that public agencies should not approve projects as proposed if there are feasible mitigation measures available that would substantially lessen the environmental effects of such projects (CEQA Statute Section 21002). Included with each mitigation measure are the plan requirements needed to ensure that the mitigation is included in the plans and construction of the project and the required timing of the action (e.g., prior to development of final construction plans, prior to commencement of construction, prior to operation, etc.).

The impacts and associated mitigation measures identified for the project are shown in Table ES-2, Summary of Impacts and Mitigation Measures. The table includes significant and less-than-significant impacts, all of which are identified with an impact number (e.g., AQ Impact 1). The impact summary table describes and classifies each impact, lists recommended mitigation when applicable, and states the level of residual impact (i.e., the level of impact remaining after implementation of identified mitigation). A summary of project alternatives, including the environmentally superior alternative, is included in Section 7, *Project Alternatives*, of this Executive Summary.

Table ES-2. Summary of Impacts and Mitigation Measures

Project Component	Impacts	Mitigation Measures	Residual Impacts
Aesthetics			
Specific Plan Area	**AES Impact 1:** The project would not have a substantial adverse effect on a scenic vista.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)
Off-Site Improvements	**AES Impact 2:** Off-site improvements would not have an adverse effect on a scenic vista.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)
Specific Plan Area	**AES Impact 3:** The project would substantially degrade the visual character of the site and its surroundings.	**AES/mm-3.1:** The Dana Reserve Specific Plan shall create a U.S. Route 101 Visual Screening Zone along the length of the project adjacent to the utility easement and U.S. Route 101, for the purpose of reducing visibility of the development and minimizing visual impacts to the vegetated visual character of the site and its surroundings as seen from the highway. The U.S. Route 101 Visual Screening Zone shall be a minimum width of 30 feet. The screening zone shall be in addition to the minimum 50-foot width of the utility easement. Existing trees in this zone shall be preserved. Where no trees exist in this zone, oak trees and native shrubs shall be planted. This screening zone shall be implemented as part of the first phase of project development. Plantings shall achieve a minimum of 50% visual screening of the development as seen from U.S. Route 101 within 10 years of planting. Trees planted in this zone shall be subject to the size and ratio requirement identified in Mitigation Measure AES/mm-3.2. **AES/mm-3.2:** Replacement trees shall be planted within the “on-site” project boundaries in areas that maximize their visibility from public roadways and common areas. Replacement trees shall be planted from the following container sizes: 20% of the replacement trees shall be a minimum of 15-gallon container size, 20% of the replacement trees shall be a minimum of 24-inch box container size, and 10% of the replacement trees shall be a minimum of 48-inch container size. All replacement trees shall be maintained in perpetuity.	Residual impacts would be less than significant with mitigation (Class II)
Off-Site Improvements	**AES Impact 4:** Off-site improvements would not substantially degrade the visual character of the off-site improvement areas and their surroundings.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)
Specific Plan Area	**AES Impact 5:** The project would create a new source of nighttime lighting or glare.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)

Project Component	Impacts	Mitigation Measures	Residual Impacts
Off-Site Improvements	**AES Impact 6:** Off-site improvements would create a new source of nighttime lighting or glare.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)
Cumulative	**AES Impact 7:** The project would contribute to cumulative aesthetic and visual resource impacts.	Implement Mitigation Measures **AES/mm-3.1 through AES/mm-3.3**. **AES/mm-7.1:** The Dana Reserve Specific Plan shall require preparation of a Visual Impact Assessment for each subsequent implementing development. The Visual Impact Assessments shall analyze the proposed subsequent development prior to its occurrence with the goal of minimizing project noticeability from areas outside Dana Reserve boundaries.	Residual impacts would be less than significant with mitigation (Class II)
Agriculture and Forestry Resources			
Specific Plan Area	**AG Impact 1:** The project would not result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on maps prepared pursuant to the FMMP, to non-agricultural use.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)
Off-Site Improvements	**AG Impact 2:** Off-site improvements would not result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on maps prepared pursuant to the FMMP, to non-agricultural use.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)
Specific Plan Area	**AG Impact 3:** The project would not conflict with existing zoning for agricultural use or a Williamson Act contract.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)
Off-Site Improvements	**AG Impact 4:** Off-site improvements would not conflict with existing zoning for agricultural use or a Williamson Act contract.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)
Specific Plan Area	**AG Impact 5:** The project could involve other changes in the existing environment which, due to their location or nature, could result in conversion of farmland to non-agricultural use.	Implement Mitigation Measures **AQ/mm-3.2 and AQ/mm-3.3**.	Residual impacts would be less than significant with mitigation (Class II)
Off-Site Improvements	**AG Impact 6:** Off-site improvements could involve other changes in the existing environment which, due to their location or nature, could result in conversion of farmland to non-agricultural use.	Implement Mitigation Measure **AQ/mm-3.2**.	Residual impacts would be less than significant with mitigation (Class II)

Project Component	Impacts	Mitigation Measures	Residual Impacts
Cumulative	**AG Impact 7:** The project would not result in a cumulatively considerable impact to agricultural resources.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)
Air Quality			
Specific Plan Area	**AQ Impact 1:** The project would conflict with an applicable air quality plan.	Implement Mitigation Measures **AQ/mm-3.1 through AQ/mm-3.3 and TR/mm-3.1**.	Residual impacts would be significant and unavoidable (Class I)
Off-Site Improvements	**AQ Impact 2:** Off-site improvements would not conflict with an applicable air quality plan.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)
Specific Plan Area	**AQ Impact 3:** The project would result in a cumulatively considerable net increase of criteria pollutants in exceedance of established SLOAPCD daily emissions thresholds.	Implement Mitigation Measure **TR/mm-3.1**. **AQ/mm-3.1:** The following measures shall be implemented to reduce construction generated mobile-source and evaporative emissions: 1. Maintain all construction equipment in proper tune according to manufacturer's specifications. 2. Fuel all off-road and portable diesel-powered equipment with California Air Resources Board-certified motor vehicle diesel fuel (non-taxed version suitable for use off-road). 3. Diesel-fueled construction equipment shall meet, at a minimum, California Air Resources Board B's Tier 3, or newer, certified engines or cleaner off-road heavy-duty diesel engines, and comply with the State Off-Road Regulation. Heavy-duty off-road equipment meeting Tier 4 emissions standards shall be used to the extent locally available. 4. Use on-road heavy-duty trucks that meet the California Air Resources Board's 2010, or cleaner, certification standard for on-road heavy-duty diesel engines, and comply with the State On-Road Regulation. 5. Construction or trucking companies with fleets that do not have engines in their fleet that meet the engine standards identified in the above two measures (e.g., captive or nitrogen oxides exempt area fleets) may be eligible by proving alternative compliance. 6. Electrify equipment when feasible. 7. Substitute gasoline-powered in place of diesel-powered equipment, where feasible. 8. Use alternative-fueled construction equipment on-site where feasible, such as compressed natural gas (CNG), liquefied natural gas (LNG), propane, or biodiesel.	Residual impacts would be significant and unavoidable (Class I)

Project Component	Impacts	Mitigation Measures	Residual Impacts
		9. When applicable, portable equipment, 50 horsepower (hp) or greater, used during construction activities shall be registered with the California statewide portable equipment registration program (issued by the California Air Resources Board) or be permitted by the San Luis Obispo Air Pollution Control District. Such equipment may include power screens, conveyors, internal combustion engines, crushers, portable generators, tub grinders, trammel screens, and portable plants (e.g., aggregate plant, asphalt plant, concrete plant). For more information, contact the San Luis Obispo Air Pollution Control District Engineering and Compliance Division at (805) 781-5912. 10. Construction of the proposed project shall use low- volatile organic compounds content paints not exceeding 50 grams per liter. 11. To the extent locally available, use prefinished building materials or materials that do not require the application of architectural coatings. 12. The following idling restrictions near sensitive receptors for both on- and off-road equipment shall be implemented: a. Staging and queuing areas shall not be located within 1,000 feet of sensitive receptors; b. Diesel idling within 1,000 feet of sensitive receptors is not permitted; c. Use of alternative fueled equipment is recommended whenever possible; and d. Signs that specify the no idling requirements must be posted and enforced at the construction site. 13. On-road vehicle operations shall comply with 13 California Code of Regulations Section 2485, which limits diesel-fueled commercial motor vehicles that operate in the State of California with gross vehicular weight ratings of greater than 10,000 pounds and licensed for operation on highways. It applies to California- and non-California-based vehicles. In general, the regulation specifies that drivers of said vehicles: a. Shall not idle the vehicle's primary diesel engine for greater than 5 minutes at any location, except as noted in Subsection (d) of the regulation; and b. Shall not operate a diesel-fueled auxiliary power system (APS) to power a heater, air conditioner, or any ancillary equipment on that vehicle during sleeping or resting in a sleeper berth for greater than 5 minutes at any location when within 100 feet of a restricted area, except as noted in Subsection (d) of the regulation. 14. Signs shall be posted in the designated queuing areas and job sites to remind drivers of the 5-minute idling limit. The specific requirements and exceptions in the regulation can be reviewed at the following web site: www.arb.ca.gov/msprog/truck-idling/2485.pdf.	

Project Component	Impacts	Mitigation Measures	Residual Impacts
		15. Off-road diesel equipment shall comply with the 5-minute idling restriction identified in Section 2449(d)(3) of the California Air Resources Board's In-Use Off-Road Diesel regulation available at: www.arb.ca.gov/regact/2007/ordiesl07/frooal.pdf. **AQ/mm-3.2:** The following measures shall be implemented to reduce construction-generated fugitive dust. These measures shall be shown on grading and building plans: 1. Reduce the amount of disturbed area where possible. 2. Use water trucks, San Luis Obispo Air Pollution Control District-approved dust suppressants (see Section 4.3 in the California Environmental Quality Act Air Quality Handbook), or sprinkler systems in sufficient quantities to prevent airborne dust from leaving the site and from exceeding the San Luis Obispo Air Pollution Control District's limit of 20% opacity for greater than 3 minutes in any 60-minute period. Increased watering frequency would be required whenever wind speeds exceed 15 miles per hour. Reclaimed (non-potable) water should be used whenever possible. Please note that since water use is a concern due to drought conditions, the contractor or builder shall consider the use of a San Luis Obispo Air Pollution Control District-approved dust suppressant where feasible to reduce the amount of water used for dust control. For a list of suppressants, see Section 4.3 of the California Environmental Quality Act Air Quality Handbook. 3. All dirt stockpile areas should be sprayed daily as needed. 4. Permanent dust control measures identified in the approved project revegetation and landscape plans should be implemented as soon as possible following completion of any soil-disturbing activities. 5. Exposed ground areas that are planned to be reworked at dates greater than 1 month after initial grading should be sown with a fast-germinating, non-invasive grass seed and watered until vegetation is established. 6. All disturbed soil areas not subject to revegetation should be stabilized using approved chemical soil binders, jute netting, or other methods approved in advance by the San Luis Obispo Air Pollution Control District. 7. All roadways, driveways, sidewalks, etc. to be paved should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used. 8. Vehicle speed for all construction vehicles shall not exceed 15 miles per hour on any unpaved surface at the construction site. 9. All trucks hauling dirt, sand, soil, or other loose materials are to be covered or should maintain at least 2 feet of freeboard (minimum vertical distance between the top of load and top of trailer) in accordance with California Vehicle Code Section 23114. 10. Install wheel washers at the construction site entrance/exit, wash off the tires or tracks of all trucks and equipment leaving the site, or implement other San Luis Obispo Air Pollution Control District-approved track-out	

Project Component	Impacts	Mitigation Measures	Residual Impacts
		prevention devices sufficient to minimize the track-out of soil onto paved roadways. 11. 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. 12. The burning of vegetative material shall be prohibited. Effective February 25, 2000, the San Luis Obispo Air Pollution Control District prohibited developmental burning of vegetative material within San Luis Obispo County. For more information, contact the San Luis Obispo Air Pollution Control District Engineering and Compliance Division at (805) 781-5912. 13. The contractor or builder shall designate a person or persons to monitor the fugitive dust emissions and enhance the implementation of the measures as necessary to minimize dust complaints, reduce visible emissions below 20% opacity, and prevent the transport of dust off-site. Their duties shall include holidays and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the San Luis Obispo Air Pollution Control District Compliance Division prior to the start of any grading or earthwork. **AQ/mm-3.3:** The following mitigation measures shall be implemented, to the extent possible, to minimize long-term operational emissions: 1. Install electric fireplaces in place of U.S. Environmental Protection Agency -certified Tier 2 residential wood-burning appliances. 2. Provide a pedestrian-friendly and interconnected streetscape with good access to/from the development for pedestrians, bicyclists, and transit users to make alternative transportation more convenient, comfortable, and safe. Features may include appropriate signalization and signage, safe routes to school, linking cul-de-sacs and dead ends, orienting buildings toward streets with automobile parking in the rear, etc. 3. For all commercial and multi-family residential land uses, provide shade (e.g., through tree plantings or built structures) over 50% of parking spaces to reduce evaporative emissions from parked vehicles, excluding areas where increased shade would affect the performance of solar photovoltaic systems. 4. Reduce fugitive dust from roads and parking areas with the use of paving or other materials. 5. Use a San Luis Obispo Air Pollution Control District-approved suppressant on private unpaved roads leading to the site, unpaved driveways, and parking areas applied at a rate and frequency that ensures compliance with San Luis Obispo Air Pollution Control District Rule 401: Visible Emissions and that off-site nuisance impacts do not occur. 6. Incorporate traffic calming modifications to project roads to reduce vehicle speeds and increase pedestrian and bicycle usage and safety. 7. Work with San Luis Obispo Council of Governments to create, improve, or expand an on-site or nearby Park and Ride lot with car parking and bike	

Project Component	Impacts	Mitigation Measures	Residual Impacts
		lockers in proportion to the size of the project. The Park and Ride lot proposed as part of the Dana Reserve Specific Plan could meet the requirements of this measure, if upon review of final design plans, the County and San Luis Obispo Council of Governments concur that the on-site Park and Ride lot is in proportion to the size of the Dana Reserve Specific Plan project. 8. Implement on-site circulation design elements in parking lots to reduce vehicle queuing and improve the pedestrian environment. 9. Require future commercial land uses to provide employee lockers and showers to promote bicycle and pedestrian use. One shower and five lockers for every 25 employees is recommended. 10. Increase bicycle accessibility and safety in the vicinity of the project; for example, provide interconnected bicycle routes/lanes or construction of bikeways. 11. Provide on-site bicycle parking: both short-term racks and long-term lockers, or a locked room with standard racks and access limited to bicyclists only. 12. If the project is located on an established transit route, provide improved public transit amenities (e.g., covered transit turnouts, direct pedestrian access, bicycle racks, covered bench, smart signage, route information displays, lighting, etc.). 13. Encourage commercial land uses to provide a bicycle-share program. 14. Require 15% of fleet vehicles owned by commercial land uses to be zero-emission vehicles (ZEVs). This requirement shall apply to commercial land uses and fleets based on-site within the Specific Plan Area and not on a larger scale for commercial operations that occur at multiple locations. 15. Encourage neighborhood electric vehicles/car-share program for the development. 16. Provide dedicated parking for carpools, vanpools, and/or high-efficiency vehicles to meet or exceed California Green Building Standards Tier 2 for nonresidential land uses. 17. Work with SLO Regional Rideshare to educate occupants with alternative transportation and smart commute information (e.g., transportation board, electronic kiosk, new hire packets, web portal, newsletters, social media, etc.) 18. Encourage nonresidential land uses to implement and promote programs to reduce employee vehicle miles traveled (e.g., incentives, SLO Regional Rideshare trip reduction program, vanpools, on-site employee housing, alternative schedules (e.g., 9/80s, 4/10s, telecommuting, satellite work sites, etc.). 19. Community event centers (i.e., amphitheaters, theaters, and stadiums) shall provide free valet bicycle parking.	

Project Component	Impacts	Mitigation Measures	Residual Impacts
		20. Meet or exceed applicable building standards at the time of development for providing electric vehicle charging infrastructure. 21. Meet or exceed applicable building standards at the time of development for building energy efficiency with a goal of achieving zero net energy (ZNE) buildings. 22. Implement a "No Idling" vehicle program, which includes signage enforcement, etc. 23. Meet or exceed applicable building standards at the time of development for utilizing recycled content materials. 24. Meet or exceed applicable building standards at the time of development for reducing cement use in the concrete mix as allowed by local ordinance and conditions. 25. Meet or exceed applicable building standards at the time of development for the use of greywater, rainwater, or recycled water. 26. Meet or exceed applicable building standards at the time of development for water conservation (e.g., use of low-flow fixtures, water-efficient irrigation systems, drought-tolerant landscaping). 27. Meet or exceed applicable building standards at the time of development for using shading, trees, plants, cool roofs, etc. to reduce the "heat island" effect. 28. All built-in appliances shall comply with California Title 20, Appliance Efficiency Regulation. 29. Utilize on-site renewable energy systems (e.g., solar, wind, geothermal, biomass and/or biogas) sufficient to meet or exceed applicable building standards at the time of development with a goal of achieving zero net energy (ZNE) buildings. **30.** Design roof trusses to handle dead weight loads of standard solar-heated water and photovoltaic panels.	
Off-Site Improvements	**AQ Impact 4:** Off-site improvements could result in a cumulatively considerable net increase of criteria pollutants in exceedance of established SLOAPCD emissions thresholds.	Implement Mitigation Measures **AQ/mm-3.1** and **AQ/mm-3.2**.	Residual impacts would be less than significant with mitigation (Class II)
Specific Plan Area	**AQ Impact 5:** The project could expose sensitive receptors to substantial pollutant concentrations.	Implement Mitigation Measures **AQ/mm-3.1 and AQ/mm-3.2**. **AQ/mm-5.1:** The following mitigation measures shall be implemented to reduce long-term exposure to localized pollutant concentrations: 1. Sensitive land uses, including, but not limited to, residential dwellings, childcare facilities, and convalescent care facilities, shall be oriented as far from U.S. Route 101 as possible and shall not be located within 500 feet of the edge of pavement of U.S. Route 101 (see Figure 2 of Environmental Impact Report Appendix D). In the event future development proposals include sensitive land uses within the 500-foot	Residual impacts would be less than significant with mitigation (Class II)

Project Component	Impacts	Mitigation Measures	Residual Impacts
		buffer from U.S. Route 101, those sensitive land uses shall be disallowed unless a detailed Health Risk Assessment, approved by the County and San Luis Obispo Air Pollution Control District, documents that health risks associated with proximity to U.S. Route 101 would be within acceptable thresholds in effect at the time development is proposed.	
Off-Site Improvements	**AQ Impact 6:** Off-site improvements could expose sensitive receptors to substantial pollutant concentrations.	Implement Mitigation Measures **AQ/mm-3.1** and **AQ/mm-3.2**.	Residual impacts would be less than significant with mitigation (Class II)
Specific Plan Area	**AQ Impact 7:** The project could result in other emissions (such as those leading to odors) that may adversely affect a substantial number of people.	Implement Mitigation Measures **AQ/mm-3.1, AQ/mm-3.2, and AQ/mm-5.1**. **AQ/mm-7.1:** Prior to any grading activities, a geologic evaluation shall be conducted to determine if naturally occurring asbestos is present within the area that will be disturbed. If naturally occurring asbestos is not present, an exemption request must be filed with the San Luis Obispo Air Pollution Control District. If naturally occurring asbestos is found at the site, the applicant must comply with all requirements outlined in the Asbestos Airborne Toxic Control Measure for Construction, Grading, Quarrying, and Surface Mining Operations (ATCM). These requirements may include but are not limited to: 1. Development of an Asbestos Dust Mitigation Plan, which must be approved by the San Luis Obispo Air Pollution Control District before operations begin; and 2. Development and approval of an Asbestos Health and Safety Program (required for some projects).	Residual impacts would be less than significant with mitigation (Class II)
Off-Site Improvements	**AQ Impact 8:** Off-site improvements could result in other emissions (such as those leading to odors) that may adversely affect a substantial number of people.	Implement Mitigation Measures **AQ/mm-3.1**, **AQ/mm-3.2**, and **AQ/mm-7.1**.	Residual impacts would be less than significant with mitigation (Class II)
Cumulative	**AQ Impact 9:** The project would result in cumulatively considerable impacts related to air quality.	Implement Mitigation Measures **AQ/mm-3.3** and **TR/mm-3.1**.	Residual impacts would be significant and unavoidable (Class I)
Biological Resources			
Specific Plan Area	**BIO Impact 1:** The project could directly or indirectly impact special-status plant and wildlife species.	**BIO/mm-1.1: Environmental Monitor.** Prior to permit issuance for any future development within the project area, the applicant shall retain an environmental monitor for all measures requiring environmental mitigation. The monitor shall be responsible for:	Residual impacts would be significant and unavoidable (Class I)

Project Component	Impacts	Mitigation Measures	Residual Impacts
		1. ensuring that procedures for verifying compliance with environmental mitigations are implemented; 2. establishing lines of communication and reporting methods; 3. conducting compliance reporting; 4. conducting construction crew training regarding environmentally sensitive areas and protected species; 5. maintaining authority to stop work; and 6. outlining actions to be taken in the event of non-compliance. Monitoring shall be conducted full time during the initial disturbances (site clearing) and be reduced to monthly following initial disturbances. **BIO/mm-1.2: Worker Environmental Training Program.** Prior to implementation of construction activities (including staging and mobilization), all personnel associated with project construction shall attend a training to facilitate worker environmental awareness. The Worker Environmental Training shall be conducted by a County of San Luis Obispo-approved qualified biologist to help workers recognize special-status plants and animals to be protected in the project area. The training program shall include: 1. Identification of relevant sensitive species and habitats. 2. Description of the regulatory status and general ecological characteristics of sensitive resources, and review of the limits of construction and avoidance measures required to reduce impacts to biological resources within the work area. 3. Consequences for non-compliance. 4. Fact sheet with information covered in training for distribution to all contractors and other personnel involved with construction of the project. 5. Web-link to maps showing locations of special-status taxa on-site, and literature and photographs or illustrations of sensitive plants, animals, and habitats. 6. Documentation of each employee's participation in trainings and information presented. 7. Annual renewal training for the duration of the project. The contractor shall set aside time for the project biologist to provide the Worker Environmental Training for all contractor's and subcontractor's employees that will be on-site regarding resource protection. Topics will include regulatory framework and best practices to avoid and minimize impacts to protected plants, protected animals, and their habitats. Approximately 30 minutes shall be allocated for training. Each group of new personnel or individuals shall be provided with an environmental briefing by the project biologist. This training may be virtual. During morning safety briefings, the project biologist may provide updates related to environmental conditions affected by scheduled actions. Contractor's and subcontractor's employees will be given a pocket-sized booklet by the project biologist in digital and/or paper format summarizing the Worker	

Project Component	Impacts	Mitigation Measures	Residual Impacts
		Environmental Training. The booklet prepared by the project biologist will include points of contact and protocol regarding emergencies and protected resource matters. Contractor's and subcontractor's employees shall be familiar with the information in the booklet and shall follow all rules and directions in the booklet while performing work for the project. Contractor's and subcontractor's employees shall always have a copy of the booklet while on the project site. **BIO/mm-1.3: Cover Excavations.** During construction, all trenches, holes, and other excavations with sidewalls steeper than a 1:1 (45 degree) slope and 2 or more feet deep shall be covered when workers or equipment are not actively working in the excavation. If any such excavations remain uncovered, they shall have an escape ramp of earth or a non-slip material with a 1:1 (45 degree) slope or flatter. All excavated areas shall be inspected for wildlife before backfilling. **BIO/mm-1.4: Biodegradable Erosion Control.** During construction, use erosion control products made of natural fiber (biodegradable) to prevent wildlife from getting ensnared or strangled by monofilament, coir rolls, erosion control mats or blankets, straw or fiber wattles, or similar erosion control products. **BIO/mm-1.5: Public Education Program.** In support of the mitigation measures listed above, public education shall be provided to homeowners, commercial facility owners, and investors regarding protected plants, protected animals, and their habitat. A colorful booklet shall be distributed to homeowners, commercial owners, and occupants. Information in the booklet shall also be made available as an interactive website provided to the County of San Luis Obispo and the Homeowners' Association(s). Information shall include descriptions of sensitive plant and animal habitats impacted, protected, and mitigations implemented. Diagnostic information for sensitive plant and animal taxa and their habitats shall be provided in a reader-friendly format. Booklet and website text shall be prepared by technical experts and produced in cooperation with professional graphic artists and publication specialists. **BIO/mm-1.6: Prohibition of Invasive Plants.** The landscape architect shall provide a signed statement on the landscape plans that the planting plan does not include any plant that occurs on the California Exotic Pest Plant Council and the California Invasive Plant Council (Cal-IPC) Lists 1, 2, and 4. Plants considered to be invasive by the California Exotic Pest Plant Council and the Cal-IPC shall not be used on-site.	
Specific Plan Area	**BIO Impact 2:** The project could directly and indirectly impact Pismo clarkia.	Implement Mitigation Measures **BIO/mm-1.1 through BIO/mm-1.6**. **BIO/mm-2.1: Incidental Take Permit.** Prior to any ground or vegetation disturbance that would impact Pismo clarkia (e.g., nearby tree removal, grading), the project applicant shall obtain all necessary approvals from the California Department of Fish and Wildlife. Concurrence shall be provided by the California Department of Fish and Wildlife that the project would result in take of a state-listed species and that an Incidental Take Permit, Conservation Easement, and Habitat Management Plan are required prior to disturbance under California Fish and Game Code Section 2081. A conservation easement over the Pismo clarkia habitat will include the California Department of Fish and Wildlife as a third-party beneficiary and may also include the County of San Luis Obispo.	Residual impacts would be less than significant with mitigation (Class II)

Project Component	Impacts	Mitigation Measures	Residual Impacts
		BIO/mm-2.2: Avoidance. Pismo clarkia patches identified on-site during 2019 and 2020 surveys shall be avoided to the maximum extent practicable. Immediately prior to construction, appropriately timed surveys will be conducted by a qualified biologist to determine the extent of the distribution of plants during the construction year. The extant population boundaries mapped in 2019 and 2020, plus any expansions observed during surveys conducted in the year of construction, will be flagged by a qualified biologist. **BIO/mm-2.3: Mitigation.** Impacts to Pismo clarkia shall be mitigated at a 3:1 ratio of reoccupied habitat to occupied habitat impacted. The population extent and number of plants impacted will be equal to or will not exceed 0.02 acre and/or 40 individuals when seasonal climate conditions are similar to 2020 climate conditions. Additional surveys shall be conducted in 2022 and in the year immediately prior to construction to determine population size and the extent of impacts. In years less favorable than 2020 (appropriately timed and sufficient rainfall and temperature), the areal extent will remain the same. Impacts to individual Pismo clarkia plants will occur after seed collection. On-site seed collection of remaining populations used to reestablish additional populations shall be limited to no more than 10% of each remaining patch. The topsoil of impacted patches will be collected prior to site grading in order to preserve the seed bank. Topsoil will be relocated to suitable unoccupied habitat areas to promote the expansion of occupied habitat. Using seeds collected from the impacted population and preserved populations on-site, additional patches of the plant shall be reestablished at a 3:1 ratio along appropriate boundaries of preserved oak woodland habitat areas. A protective conservation easement shall be placed over on-site habitats that contain occupied and unoccupied habitat suitable for Pismo clarkia. Genetic analysis will be conducted to determine the similarity or difference between the population of Pismo clarkia on the Dana Reserve with at least two other populations in the Arroyo Grande region. This research and findings will be submitted to a peer reviewed journal and be part of the public record during the mitigation monitoring period.	
Specific Plan Area	**BIO Impact 3:** The project could directly and indirectly impact mesa horkelia, Nipomo Mesa ceanothus, and sand mesa manzanita.	Implement Mitigation Measures **BIO/mm-1.1 through BIO/mm-1.6, BIO/mm 14.1, and BIO/mm 15.1**. **BIO/mm-3.1: Mitigation for Plants Ranked 1B (Rare or Endangered) by the California Native Plant Society.** Due to the highly endemic nature of the plant taxa being impacted and the loss of a significant portion of occupied habitat within their limited range, mitigation to offset impacts shall include a combination of preservation of existing populations either on- or off-site at a 1:1 ratio of individuals impacted to individuals preserved and the restoration of suitable habitat at a 2:1 ratio of individuals impacted to individuals restored. Prior to issuance of the grading permit, the applicant shall secure appropriate habitat with known populations of mesa horkelia, Nipomo Mesa ceanothus, and sand mesa manzanita and enough suitable	Residual impacts would be less than significant with mitigation (Class II)

Project Component	Impacts	Mitigation Measures	Residual Impacts
		habitat to reestablish 14,000 mesa horkelia, 100 Nipomo Mesa ceanothus, and 626 sand mesa manzanita. The applicant shall also prepare and begin implementation of a Habitat Mitigation and Monitoring Plan to preserve and expand patches of mesa horkelia, Nipomo Mesa ceanothus, and sand mesa manzanita on- and off-site. The Habitat Mitigation and Monitoring Plan shall be prepared by a qualified individual acceptable to the Director of Planning and Building and shall conform to California Native Plant Society mitigation guidelines (California Native Plant Society 1998). Habitat Mitigation and Monitoring Plan implementation must demonstrate a trajectory toward successful mitigation (i.e., meeting annual performance criteria) prior to occupancy of the last phase. To meet the County of San Luis Obispo's policy of No Net Loss, any enhanced and/or created habitat would need to confirm establishment of individuals and suitable/occupied habitat such that there is no net loss. Maintenance, monitoring, and reporting to the County of San Luis Obispo would be required until the enhanced/created habitat has successfully established individuals at the required 2:1 ratio. Measures within the Habitat Mitigation and Monitoring Plan shall include salvaging plant and seed material from impacted populations, habitat protection, herbicide avoidance, fencing, and propagation of pollinator plants appropriate to support native bees associated with pollination of these plants. Prior to grading, plant and seed material shall be salvaged and used to enhance or establish populations in protected habitat areas. This should include the excavation and relocation of the root burls of sand mesa manzanita where practical since they are known resprout from burls as well as from seed. The Habitat Mitigation and Monitoring Plan shall also establish a mitigation receptor site for the long term storage of salvaged material. In addition to direct habitat preservation, the applicant may also fund Public Benefit restoration efforts on conserved land to be implemented and monitored by organizations such as The Nature Conservancy, San Luis Obispo Land Conservancy, Greenspace, or Cambria Land Trust. The fee would be used to pay for mitigation planting, maintenance, and long-term monitoring in perpetuity. Material salvaged on-site should be incorporated into these mitigation planting efforts where possible. Measures to protect and expand mesa horkelia, Nipomo Mesa ceanothus, and sand mesa manzanita within protected oak woodland shall also be incorporated in the On-Site Oak Woodland Habitat Protection and Management Plan.	
Specific Plan Area	**BIO Impact 4:** The project could directly and indirectly impact CRPR 4 and Watch List plant species, including California spineflower, sand buck brush, and sand almond.	Implement Mitigation Measures **BIO/mm-1.1 through BIO/mm-1.6, BIO/mm 14.1, and BIO/mm 15.1**. **BIO/mm-4.1: Mitigation for Plants Ranked CRPR 4 (Limited Distribution – Watch List) by the California Native Plant Society.** Restoration and/or enhancement of 45 acres of conserved sandy habitat suitable for California spineflower, sand buck brush, and sand almond shall occur to mitigate for impacts at	Residual impacts would be significant and unavoidable (Class I)

Project Component	Impacts	Mitigation Measures	Residual Impacts
		a 1:1 ratio above the 10% impact threshold. Prior to issuance of the grading permit, a plan to conserve and/or restore off-site habitat for California spineflower, sand buck brush, and sand almond shall be prepared. The plan shall be prepared by a qualified individual acceptable to the Director of Planning and Building and approved prior to implementation. The plan shall include purchase for conservation of land containing impacted species and/or restoration of approximately 45 acres of grassland habitat with high microsite suitability for California spineflower, sand buck brush, and sand almond. The plan shall conform to California Native Plant Society guidelines for mitigation (California Native Plant Society 1998). The applicant may fund Public Benefit restoration efforts on conserved land to be implemented and monitored by organizations such as The Nature Conservancy, San Luis Obispo Land Conservancy, Greenspace, or Cambria Land Trust. The funds would be used to pay for mitigation planting, maintenance, and long-term monitoring in perpetuity. Sand buck brush and sand almond shall be planted at a ratio over 1:1 to achieve a no-net loss after 5 years. California spineflower shall be seeded in grassland habitat managed by mowing or grazing in a manner than supports spineflower reproduction in normal rainfall years. Plant material shall be derived from sources on the Nipomo Mesa. Habitat protection and long-term maintenance shall be funded by an endowment sufficient to monitor and maintain habitat appropriate to attempt reestablishment or expansion of California spineflower on the restoration site. **BIO/mm-4.2: Michael's Rein Orchid.** Measures to avoid and protect Michael's rein orchid in on-site oak woodland areas proposed for protection shall be incorporated into an on-site Habitat Mitigation and Monitoring Plan. Since all observed individuals of Michael's rein orchid are located directly south of Pismo clarkia Patch 3, this species shall incidentally benefit from being included in Mitigation Measure BIO/mm 2.3. Construction workers and biological monitors shall also be made aware of and instructed to avoid this orchid during monitoring for Pismo clarkia (Mitigation Measures BIO/mm-2.1 and BIO-mm/2.2).	
Specific Plan Area	**BIO Impact 5:** The project could indirectly impact monarch butterflies.	Implement Mitigation Measures **BIO/mm-1.1 through BIO/mm-1.6**. **BIO/mm-5.1: Monarch Butterfly Preconstruction Survey.** Site disturbance and construction activity adjacent to suitable monarch butterfly overwintering habitat shall be avoided during the monarch butterflies' fall and winter migration (late October through February) to the greatest extent feasible. If tree or vegetation removal or site disturbance is necessary during the monarch butterflies' fall and winter migration, a qualified biologist shall conduct a preconstruction survey for monarch butterflies that could utilize trees on the site for overwintering. If monarch butterflies are detected, development will be postponed until after the overwintering period or until a qualified biologist determines monarch butterflies are no longer utilizing the trees on site for overwintering.	Residual impacts would be less than significant with mitigation (Class II)
Specific Plan Area	**BIO Impact 6:** The project could directly and indirectly impact northern California legless lizards and Blainville's horned lizards.	Implement Mitigation Measures **BIO/mm-1.1 through BIO/mm-1.6, BIO/mm-14.1, BIO/mm-15.1, and BIO/mm-18.4**. **BIO/mm-6.1: Special-Status Reptiles Protection and Relocation.** Prior to issuance of the grading permit, the project applicant shall develop a Special-status	Residual impacts would be less than significant

Project Component	Impacts	Mitigation Measures	Residual Impacts
		Reptile Relocation Plan for northern California legless lizard and Blainville's (coast) horned lizard. The goal of the relocation plan is to establish guidelines and protocols for relocating special-status reptiles out of harm's way. The relocation plan shall include an overview of prior surveys for the species, figures of known and potential habitat areas, timing of relocation efforts, and details regarding capture and relocation methods. Additionally, the relocation plan shall identify and characterize suitable on-site relocation sites for each species. The following details shall be specifically incorporated and expanded upon in the relocation plan: 1. Relocation surveys for special-status reptiles shall be conducted during appropriate times of year when the species are active and can be located. Subject to expert refinement in the relocation plan, legless lizard cover board and raking surveys shall be conducted between January and July. Because legless lizards are not expected to move back into work areas after relocation, these surveys can be done well in advance of earthwork. Horned lizard surveys shall be conducted on warm days in April through August, immediately prior to commencement of earthwork. The relocation plan shall require a minimum of three surveys conducted during the time of year/day when each species is most likely to be observed. 2. Relocation surveys for legless lizards shall utilize a combination of cover boards and soil raking to find lizards in suitable habitat areas prior to commencement of earthwork activities. Relocation surveys for horned lizards shall be completed by pedestrian transects on warm days utilizing narrow spacing to visually search for lizards on the surface of the soil. Special-status reptiles shall be captured by hand, stored in suitable wildlife relocation bins, and immediately relocated to approved habitat. 3. The relocation plan shall identify suitable legless lizard relocation habitat as any sandy soil area with suitable leaf litter under shrub or oak tree canopy. For horned lizard, suitable relocation habitat shall be identified as that which has friable soils, a detectable prey source, and sandy barrens for burrowing and basking. 4. The Special-Status Reptile Relocation Plan shall be submitted to the County of San Luis Obispo and California Department of Fish and Wildlife for approval no less than 60 days prior to any ground-disturbing activities within potentially occupied habitat. 5. A qualified biologist shall be present during ground-disturbing activities immediately adjacent to or within habitat that supports special-status reptiles. 6. Clearance surveys for special-status reptiles shall be conducted by a qualified biologist prior to the initiation of ground-disturbing construction each day, especially along the interface between open space and construction areas. 7. Results of the surveys and relocation efforts shall be provided to the County of San Luis Obispo and California Department of Fish and Wildlife in the annual mitigation status report. Collection and relocation of animals	with mitigation (Class II)

Project Component	Impacts	Mitigation Measures	Residual Impacts
		shall only occur with the necessary scientific collection and handling permits.	
Specific Plan Area	**BIO Impact 7:** The project could directly and indirectly impact special-status birds, raptors, and nesting birds.	Implement Mitigation Measures **BIO/mm-1.1 through BIO/mm-1.6, BIO/mm-14.1, BIO/mm-15.1, and BIO/mm-18.4**. **BIO/mm-7.1: Nesting Bird Preconstruction Survey and Nest Avoidance.** Within 1 week prior to ground-disturbing activities, if work occurs between February 1 and September 15, nesting bird surveys shall be conducted. If surveys do not locate nesting birds, construction activities may begin. If nesting birds are located, no construction activities shall occur within 100 feet of nests or within 500 feet of raptors until chicks have fledged. The project biologist may recommend a buffer decrease depending on site conditions (such as line-of-sight to the nest) and the birds' level of tolerance for construction activities. The biologist shall collect data on the birds' baseline behavior and their tolerance to disturbance by observing the birds at the nest prior to construction activities. If the birds are incubating, the biologist shall record how long they stay in the nest. If nestlings are present, the biologist shall record how frequently adults deliver food and visit the nest. The biologist shall also record the birds' reaction to the biologist and how close the biologist can get to the nest before the birds' behavior is altered or they show signs of stress or disturbance. The biologist shall set the reduced buffer distance based on these data. Nesting bird buffers may be reduced up to 50 feet, while raptor nest buffers may be reduced up to 250 feet. If nest buffers are reduced, the biologist shall monitor any construction activities that take place within 100 feet of nesting birds and 500 feet of raptor nests. If nesting birds show any signs of disturbance, including changes in behavior, significantly reducing frequency of nests visits, or refusal to visit the nest, the biologist will stop work and increase the nest buffer.	Residual impacts would be less than significant with mitigation (Class II)
Specific Plan Area	**BIO Impact 8:** Project activities, including tree removal, have the potential to impact special-status bat species and roosting bats.	Implement Mitigation Measures **BIO/mm-1.1 through BIO/mm-1.6, BIO/mm-14.1, BIO/mm-15.1, and BIO/mm-18.4**. **BIO/mm-8.1: Bat Preconstruction Surveys and Passive Relocation.** Within 30 days of construction between April and September, structures and trees or snags to be removed or pruned that are greater than 20 inches diameter at breast height shall be inspected for bats. If a bat roost is found, the qualified biologist shall implement passive relocation measures, such as installation of one-way valves. Bat maternity colonies may not be disturbed.	Residual impacts would be less than significant with mitigation (Class II)
Specific Plan Area	**BIO Impact 9:** The proposed project could directly impact American badger.	Implement Mitigation Measures **BIO/mm-1.1** through **BIO/mm-1.6**. **BIO/mm-9.1: Badger Den Preconstruction Survey and Relocation.** Preconstruction surveys shall be conducted within 30 days of beginning work on the site to identify if badgers are using proposed work areas. Survey results shall be submitted to the County with monthly construction update reports. If suitable American badger dens are identified within the disturbance footprint, den openings shall be monitored with tracking medium or an infrared camera for 3 consecutive nights to determine current use. If the den is not in use, the den shall be excavated and collapsed to ensure that no animals are present during construction. If the den is occupied during the non-maternity period and avoidance is not feasible, badgers may be relocated by first incrementally blocking the den over a 3-day	Residual impacts would be less than significant with mitigation (Class II)

Project Component	Impacts	Mitigation Measures	Residual Impacts
		period, followed by slowly excavating the den (either by hand or with mechanized equipment under the direct supervision of a qualified biologist, removing no more than 4 inches at a time) before or after the rearing season (February 15–June 30). Passive relocation of American badgers shall be conducted under the direction of a qualified biologist. If the preconstruction survey finds potential badger dens, the dens shall be inspected by the project biologist to determine whether they are occupied. If a potential badger den is too long to completely inspect from the entrance, a fiber optic scope may be used to examine the den to the end. Inactive dens may be excavated by hand with a shovel to prevent reuse of dens during construction. If badgers occupy active dens in proposed work areas between February and July, nursing young may be present. To avoid disturbance and the possibility of direct impacts to adults and nursing young, and to prevent badgers from becoming trapped in burrows during construction activity, American badger dens determined to be occupied during the breeding season (February 15–June 30) shall be flagged. Between February and July, no grading or ground-disturbing activities shall occur within 100 feet of active badger dens to protect adults and nursing young. Buffers may be modified by the qualified biologist, provided the badgers are protected, and buffers only removed after the qualified biologist determines that the den is no longer in use. If a potential den is located outside of the disturbance footprint but within 500 feet of ground-disturbing activities (including staging areas), dens shall be avoided by installation of highly visible orange construction fencing a minimum of 100 feet from the den, designating the area an Environmentally Sensitive Area. Fencing shall be installed in a manner that allows badgers to move through the fencing at-will. No equipment, vehicles, or personnel shall be permitted within Environmentally Sensitive Areas without clear permission from a qualified biologist.	
Off-Site Improvements	**BIO Impact 10:** The development of the North Frontage Road Extension Parcel could directly or indirectly impact special-status plant and wildlife species.	Implement Mitigation Measures **BIO/mm-1.1 through BIO/mm-1.6, BIO/mm-2.1 through BIO/mm-2.3, BIO/mm-3.1, BIO/mm-4.1 and 4.2, BIO/mm-5.1, BIO/mm-6.1, BIO/mm-7.1, BIO/mm-8.1, and BIO/mm-9.1**.	Residual impacts would be less than significant with mitigation (Class II)
Off-Site Improvements	**BIO Impact 11:** Off-site transportation, water, and wastewater improvements could directly or indirectly impact monarch butterfly, sharp-shinned hawk, Cooper's hawk, white-tailed kite, and other nesting birds.	Implement Mitigation Measures **BIO/mm 1 through BIO/mm-1.6, BIO/mm-2.1 through BIO/mm-2.3, BIO/mm-3.1, BIO/mm-4.1 and 4.2, BIO/mm-5.1, BIO/mm-6.1, BIO/mm-7.1, BIO/mm-8.1, BIO/mm-9.1, and BIO/mm-12.1**.	Residual impacts would be less than significant with mitigation (Class II)
Off-Site Improvements	**BIO Impact 12:** Off-site NCSD water improvements could directly or indirectly impact California red-legged frog, western pond turtle, and two-striped gartersnake.	Implement Mitigation Measures **BIO/mm-1.1 through BIO/mm-1.6**. **BIO/mm-12.1: California Red-Legged Frog, Western Pond Turtle, and Two-Striped Gartersnake Surveys and Relocation.** All work areas within 100 feet of known California red-legged frog habitat shall be surveyed by a qualified biologist each day prior to the initiation of construction activities. As necessary, the qualified biologist shall physically relocate semiaquatic, special-status species (e.g., western	Residual impacts would be less than significant with mitigation (Class II)

Project Component	Impacts	Mitigation Measures	Residual Impacts
		pond turtle, two-striped gartersnake, etc.) and common semi-aquatic species (e.g., western toad, Pacific chorus frog, etc.) to suitable habitat areas located outside the construction zone(s). Exact procedures and protocols for relocation of the special-status species shall be based upon pre-project consultation with the California Department of Fish and Wildlife. In the event a California red-legged frog is identified in a work area, all work shall cease until the California red-legged frog has safely vacated the work area. At no time shall any California red-legged frog be relocated and/or affected by project operations without prior approval from the U.S. Fish and Wildlife Service.	
Off-Site Improvements	**BIO Impact 13:** Off-site NCSD water improvements could directly or indirectly impact least Bell's vireo and southwestern willow flycatcher.	Implement Mitigation Measures **BIO/mm-1.1 through BIO/mm-1.6 and BIO/mm-7.1**. **BIO/mm-13.1: Nesting Bird Surveys.** If construction activities are proposed during the typical nesting bird season (February 1–September 15), a nesting bird survey will be conducted by qualified biologists no more than 2 weeks prior to the start of construction to determine presence/absence of nesting birds within the project area and immediate vicinity (within 100 feet of the Nipomo Creek corridor). The County of San Luis Obispo will be notified if federally listed nesting bird species are observed during the surveys and Nipomo Community Services District will be responsible for facilitating coordination with the U.S. Fish and Wildlife Service, if necessary, to determine an appropriate avoidance strategy. Likewise, coordination with the California Department of Fish and Wildlife will be facilitated by the Nipomo Community Services District if necessary to devise a suitable avoidance plan for state-listed nesting bird species.	Residual impacts would be less than significant with mitigation (Class II)
Specific Plan Area	**BIO Impact 14:** The project will directly impact Burton Mesa chaparral.	Implement Mitigation Measure **BIO/mm-3.1**. **BIO/mm-14.1: Mitigation for Burton Mesa Chaparral (*Arctostaphylos [purissima, rudis]* Shrubland Special Stands).** Prior to issuance of the Conditional Use Permit for Oak Tree Removal and Grading/Impervious Surfaces, the applicant shall permanently protect (conserve), enhance (increase suitability of a site as habitat), and/or restore (repair damaged habitat) Burton Mesa chaparral in maritime coastal California at a 2:1 ratio of habitat preserved to habitat lost. This ratio will achieve the "no-net loss" requirement in County of San Luis Obispo Conservation and Open Space Element Policy BR 1.4 of the County of San Luis Obispo Conservation and Open Space Element. Habitat appropriate for restoration will ideally be located on the Nipomo Mesa with climatic and soil conditions that match those found on Dana Reserve. Conservation/enhancement/restoration of habitat areas contiguous with protected/restored *Quercus agrifolia* / *Adenostoma fasciculatum* – (*Salvia mellifera*) habitat shall be prioritized over isolated patches of mitigation. Areas contiguous with other protected maritime chaparral or oak woodland shall also be prioritized over isolated patches of mitigation. Where restoration is proposed, a restoration and enhancement plan approved by the California Department of Fish and Wildlife shall be submitted to the County prior to issuance of the Conditional Use Permit for Oak Tree Removal and Grading/Impervious Surfaces. A conservation easement over protected habitat shall be controlled by a qualified conservation organization	Residual impacts would be significant and unavoidable (Class I)

Project Component	Impacts	Mitigation Measures	Residual Impacts
		approved by the County. Potential conservation organizations include, but are not limited to, The Nature Conservancy, San Luis Obispo Land Conservancy, Greenspace, Cambria Land Trust, or the California Department of Fish and Wildlife. The County of San Luis Obispo shall review and approve additional analysis prior to final approval of any proposed conservation area. If appropriate habitat is not available in San Luis Obispo County at a 2:1 ratio, the applicant may fulfill half of this mitigation requirement through restoring Burton Mesa chaparral in Santa Barbara County at an additional 2:1 ratio (e.g., if only 35 acres can be preserved/restored within San Luis Obispo County, then an additional 70 acres would be required to satisfy the mitigation if purchased in Santa Barbara County). A combination of preservation and restoration at a 2:1 ratio would allow for a no-net-loss of cover by Burton Mesa chaparral constituent elements and maintain species diversity within the county.	
Specific Plan Area	**BIO Impact 15:** The project will directly impact coast live oak woodland.	**BIO/mm-15.1: Off-Site Mitigation for Coast Live Oak Woodland (*Quercus agrifolia / Adenostoma fasciculatum* – [*Salvia mellifera*]).** Prior to issuance of the Conditional Use Permit for Oak Tree Removal and Grading/Impervious Surfaces, the applicant shall permanently protect (conserve), enhance (increase suitability of a site as habitat), restore (repair damaged habitat), and/or recreate (revegetate previously lost habitat) *Quercus agrifolia / Adenostoma fasciculatum* – (*Salvia mellifera*) in coastal California at a 2:1 ratio within the range of Burton Mesa chaparral. This ratio will achieve the "no-net loss" requirement in County of San Luis Obispo Conservation and Open Space Element Policy BR 1.4 of the County of San Luis Obispo Conservation and Open Space Element. Conservation/enhancement/recreation of habitat areas shall be contiguous with mitigation for Burton Mesa chaparral. A combined approach for habitat mitigation shall include the preservation of expanded contiguous habitat of protected *Quercus agrifolia / Adenostoma fasciculatum* – (*Salvia mellifera*), recreate, restore, and/or enhance contiguous areas of *Quercus agrifolia / Adenostoma fasciculatum* – (*Salvia mellifera*). However, to comply with Senate Bill 1334, only half the mitigation requirement for loss of coast live oak can be achieved through recreation. Where restoration is proposed, a restoration and enhancement plan approved by the California Department of Fish and Wildlife shall be submitted to the County prior to issuance of the grading permit. A conservation easement over protected habitat shall be controlled by a qualified conservation organization approved by the County of San Luis Obispo. Potential conservation organizations include, but are not limited to, The Nature Conservancy, San Luis Obispo Land Conservancy, Greenspace, Cambria Land Trust, or the California Department of Fish and Wildlife. The County of San Luis Obispo shall review and approve additional analysis prior to final approval of the proposed off-site conservation area. Preservation and recreation would allow for a no-net-loss of cover by *Quercus agrifolia / Adenostoma fasciculatum* – (*Salvia mellifera*) constituent elements and preserve the diversity of oak woodland habitats in the County consistent with County of San Luis Obispo Conservation and Open Space Element Policy BR 3.3.1.	Residual impacts would be significant and unavoidable (Class I)

Project Component	Impacts	Mitigation Measures	Residual Impacts
Off-Site Improvements	**BIO Impact 16:** Off-site NCSD water improvements could directly and indirectly impact riparian habitat and sensitive aquatic resources.	Implement Mitigation Measures **BIO/mm-1.1 through BIO/mm-1.6 and BIO/mm-11.1**. **BIO/mm-16.1: Riparian Habitats.** The following measures shall be implemented for any grubbing, grading, and other ground-disturbing activities conducted within 100 feet of riparian habitat along Nipomo Creek or its tributaries to avoid potential project-related impacts to these resources and special-status species that may utilize these habitats: 1. All construction-related activities must observe a 100-foot setback from the Nipomo Creek riparian corridor, as measured from the outer edge of the riparian canopy. A minimum 50-foot setback shall be observed from the ephemeral drainages and flood channels, as measured from the outer edge of riparian vegetation. 2. If construction-related activities within the 100- or 50-foot buffers from Nipomo Creek or any other surface water resource, to the extent practicable, construction activities shall be conducted during the dry season (typically May 1–November 1), or as specified by resource agency permits and authorizations. This would reduce potential impacts to aquatic and semi-aquatic species that might be using the aquatic habitat and associated riparian vegetation as a movement/dispersal corridor. 3. Any construction activities conducted within 50 feet of Nipomo Creek, watercourses, pond, and riparian habitat shall be monitored by a qualified biologist. 4. If any special-status species are observed, the qualified biologist shall implement the measures described in BIO/mm-1.1 through BIO/mm 1.6 and BIO/mm-11.1.	Residual impacts would be less than significant with mitigation (Class II)
Off-Site Improvements	**BIO Impact 17:** Off-site NCSD water improvements will directly and indirectly impact aquatic habitats under the jurisdiction of the USACE, CDFW, and RWQCB.	**BIO/mm-17.1: Wetland Delineation.** Prior to construction in any undeveloped area where surface water resources or wetland indicators are present, the Nipomo Community Services District shall retain a qualified biologist to conduct a wetland delineation along the proposed alignment route, including at minimum a 50-foot buffer area and a 100-foot buffer along the Nipomo Creek riparian corridor. **BIO/mm-17.2:** Prior to construction within 50 feet of any stream or other surface water resource, the Nipomo Community Services District shall prepare project-specific plans for crossings. If construction activities require any earthwork within the banks of the drainages (including beneath the bed of the channel), the Nipomo Community Services District shall coordinate with the U.S. Army Corps of Engineers, California Department of Fish and Wildlife, and Regional Water Quality Control Board to obtain the appropriate permits for direct impacts to jurisdictional features. The Nipomo Community Services District shall implement all pre- and post-construction conditions identified in the permits issued. The plan shall be submitted to the County and applicable agencies 60 days prior to construction. **BIO/mm-17.3:** Prior to construction within 50 feet of any stream or other surface water resource, the Nipomo Community Services District shall implement the following measures:	Residual impacts would be less than significant with mitigation (Class II)

Project Component	Impacts	Mitigation Measures	Residual Impacts
		1. Prior to project implementation, the project area shall be clearly flagged or fenced so that the contractor is aware of the limits of allowable site access and disturbance. Areas within the designated project site that do not require regular access shall be clearly flagged as off-limit areas to avoid unnecessary damage to sensitive habitats or existing vegetation within the project area. 2. Prior to project implementation, a project Erosion Control Plan shall be prepared. During project activities, erosion control measures shall be implemented. Silt fencing, fiber rolls, and barriers (e.g., hay bales) shall be installed to establish a minimum 25-foot setback distance between the project impact areas and adjacent wetlands and other waters. At a minimum, silt fencing shall be checked and maintained on a daily basis throughout the construction period. 3. Prior to construction, the applicant shall prepare and submit to the Regional Water Quality Control Board or State Water Resources Control Board a Notice of Intent and prepare a Stormwater Pollution Prevention Plan in accordance with the requirements of the State General Order related to construction projects. The Stormwater Pollution Prevention Plan shall identify the selected stormwater management procedures, pollution control technologies, spill response procedures, and other means that will be used to minimize erosion and sediment production and the release of pollutants to surface water during construction. The applicant shall ensure that sedimentation and erosion control measures are installed prior to any ground-disturbing activities. 4. Prior to the commencement of site preparation, ground-disturbing, or construction activities, the applicant will identify required best management practices on all construction plans. These practices will be implemented prior to, during, and following construction activities as necessary to ensure their intended efficacy. Measures will include, but not necessarily be limited to, the placement of silt fencing along the down-slope side of the construction zone, on-site storage of a spill and clean-up kit at all times, and employment of both temporary and permanent erosion and sedimentation control measures (e.g., silt fencing, hay bales, straw wattles). 5. During project activities, if work occurring within stream channels is necessary, it shall be conducted during the dry season if possible (typically May 1–November 1). 6. Prior to construction, the applicant shall ensure preparation and implementation of a Spill Prevention and Contingency Plan that includes provisions for avoiding and/or minimizing impacts to sensitive habitat areas, including wetland and riparian areas and waterbodies due to equipment-related spills during project implementation. The applicant shall ensure contamination of habitat does not occur during such operations. Prior to the onset of work, the applicant shall ensure that the plan allows a prompt and effective response to any accidental spills. All workers shall be informed of the importance of preventing spills and of the appropriate	

Project Component	Impacts	Mitigation Measures	Residual Impacts
		measure to take should a spill occur. The plan shall include the following provisions: a. All equipment fueling shall be conducted within the designated staging areas of the project site. Such areas shall consist of roadway or ruderal habitat. At no time shall any equipment fueling be conducted within 100 feet of any wetland and riparian habitat area or waterbody. b. An overview of the containment measures to appropriately store and contain all fuels and associated petroleum products during the project shall be included in the plan. This shall include provisions for equipment staging areas, such as the need for drip pans underneath parked equipment and designated storage areas for fuel dispensing.	
Specific Plan Area	**BIO Impact 18:** The project will result in direct and indirect impacts to coast live oak woodland, coast live oak forest, and individual oak trees.	**BIO/mm-18.1: Prepare On-Site Tree Protection Plan for Trees Retained.** Prior to issuance of a grading permit for any future development within the Specific Plan Area, a qualified arborist shall prepare a Tree Protection Plan designed to protect retained oaks during construction. Tree protection guidelines and a root protection zone shall be established and implemented for each retained tree over 4 inches diameter at breast height within 50 feet of site disturbance. The following criteria shall be included: 1. **Preserve Oak Forest Habitat on Dana Reserve.** Designate oak forest habitat for open space preservation where limited recreational and open space uses may be allowed. Preserve a minimum of 17 acres of oak forest habitat on-site. 2. **Map and Number Trees to be Retained.** Tree canopies and trunks within 50 feet of proposed disturbance zones shall be mapped and numbered by a County of San Luis Obispo-approved arborist or biologist and a licensed land surveyor. Data for each tree shall include date, species, number of stems, diameter at breast height of each stem, critical root zone diameter, canopy diameter, tree height, health, habitat notes, and nests observed. Impacts shall be identified for native oak trees with a diameter at breast height of 4 inches or greater, as measured at a height of 4.5 feet aboveground. Impacts include any ground disturbance within the critical root zone, trunk damage, or any pruning of branches 3 inches in diameter or greater. A qualified arborist shall determine the critical root zone for each retained tree on a case-by-case basis, generally 1.5 times the average canopy radius (distance from trunk to edge of drip line). For example, a tree with a 24-foot-diameter canopy would have a 36-foot critical root zone, or approximately 18 feet from the trunk. Where the canopy has been pruned prior to evaluation, the critical root zone may be calculated as 1.5 feet per inch of the tree's diameter at breast height. For example, an 18-inch diameter at breast height tree would be assigned a 24-foot critical root zone. The extent of the critical root zone shall be used as the basis for a	Residual impacts would be significant and unavoidable (Class I)

Project Component	Impacts	Mitigation Measures	Residual Impacts

tree protection zone, such as the line of encroachment for the edge of a group of trees, shown on all construction plans.

3. **Preconstruction Meeting.** On-site preconstruction meetings for each phase that affects oak trees shall be attended by the arborist(s), owner(s), Planning staff, and earth-moving team. Explicit exhibits and discussion will focus on tree protection during construction and provisions of the Tree Protection Plan.
4. **Install Protective Fencing.** Tree protection fencing shall be installed at the perimeter of the tree protection zone. At a minimum, a tree protection zone shall be delineated as a no-construction zone. Preferably, fencing shall be installed 6 feet outside the tree protection zone. No construction equipment shall be staged, parked, or stored within 6 feet of any oak tree dripline.

   The fence shall be installed with arborist field consultation before any construction or earth moving begins. The proposed fencing shall be shown on the grading plan. It must be a minimum of 4-foot-high chain-link, snow, or safety fence staked (with t-posts 8 feet on center). The owner/applicant shall be responsible for maintaining an erect fence throughout the construction period. (For trees to be protected longer than 4 months, metal fencing is preferred to minimize maintenance requirements.) The arborist(s), upon notification, will inspect the fence placement once it is erected. After this time, fencing shall not be moved without arborist inspection/approval.

   If plastic fencing is used, a minimum of four zip ties shall be used on each stake to secure the fence. Weatherproof signs shall be permanently posted on the fences every 50 feet, with the following information: Tree Protection Zone. No personnel, equipment, materials, or vehicles allowed.
5. **Avoid and Minimize Tree Impacts.** Impacts to the oak canopy or critical root zone shall be avoided where feasible in light of project layout and the locations of physical structures, paved or otherwise altered surfaces, and infrastructure. Impacts include pruning branches over 3 inches in diameter, any ground disturbance or soil compaction within the dripline or critical root zone of the tree (whichever distance is greater), and trunk damage.
   a. No Tree Attachments. Wires, signs, and other similar items shall not be attached to the oak trees.
   b. Pruning. Pruning shall be implemented by, or under the direction of, a certified arborist. The purpose and type of pruning implemented shall be tracked by service date and class of pruning for each tree. A certified arborist shall direct all pruning. No pruning shall take more than 25% of the live crown of any native tree. Any trees that may need pruning for road/home clearance shall be pruned prior to any grading activities to avoid branch tearing. Unless a hazardous or unsafe situation exists, major trimming shall be done only during the summer months.

Project Component	Impacts	Mitigation Measures	Residual Impacts
		(Coast live oaks, which retain their leaves year-round, are generally dormant July through October.) i. Class 1 pruning emphasizes aesthetics, removal of dead, dying, and decaying weak branches and selective thinning to lessen wind resistance. ii. Class 2 pruning is for structural integrity and tree health concerns. It consists of removal of dead, dying, decaying, interfering, obstructing, and weak branches and selective thinning to lessen wind resistance. iii. Class 3 pruning is conducted for safety considerations and hazardous conditions. iv. Class 4 pruning includes crown-reduction pruning, such as reduction of tops, sides, or individual limbs. Removal of larger lower branches shall be minimized to avoid making tree tops heavy and more susceptible to "blow-overs," reduce large limb cuts that are susceptible to disease and infestation, retain wildlife habitat values associated with the lower branches, retain shade to keep summer temperatures cooler (retains higher soil moisture, greater passive solar potential, provides better conditions for oak seedling volunteers), and retain the natural shape of the tree. The amount of trimming (roots or canopy) done in any one season shall be limited as much as possible to reduce tree stress/shock (10% or less is best, 25% maximum). c. Surface Root Protection. 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. d. Utility Placement. All utilities, sewer, and storm drains shall be placed down the roads and driveways and, when possible, outside of the critical root zones. The arborist shall supervise trenching within the critical root zone. All trenches in these areas shall be exposed by air spade or hand dug with utilities routed under/over roots larger than 3 inches in diameter. Boring under oaks is also acceptable. e. Permeable Paving within 20 Feet of the Critical Root Zone. Paving shall be pervious material where access roads or driveways encroach within 20 feet of a retained oak tree's critical root zone. f. Trenching within the Critical Root Zone. All trenching within the critical root zone of native trees shall be hand dug or implemented with an air spade or bore. All major roots shall be avoided whenever possible. All exposed roots larger than 1 inch in diameter shall be clean cut with sharp pruning tools and not	

Project Component	Impacts	Mitigation Measures	Residual Impacts

left ragged. A mandatory meeting between the arborists and grading contractor(s) must take place prior to work start.

g. Grading within the Critical Root Zone. Grading shall not encroach within the critical root zone unless authorized by the grading permit. Grading shall not disrupt the normal drainage pattern around the trees. Fills shall not create a ponding condition and excavations shall not leave the tree on a rapidly draining mound. Any exposed roots shall be covered the same day they were exposed if possible. If left exposed for more than a day, roots must be covered with burlap or another suitable material and wetted down two times per day until reburied.

h. Equipment Operation. Vehicles and all heavy equipment shall not be driven under the trees, as this will contribute to soil compaction. Also, there is to be no parking of equipment or personal vehicles in these areas. All areas behind fencing are off limits unless preapproved by the arborist.

i. Existing Surfaces. The existing ground surface within the critical root zone of all oak trees shall not be cut, filled, compacted, or impaired, unless shown on the grading plans and approved by the arborist. If grading in the root zone cannot be avoided, retaining walls shall be constructed to minimize cut and fill impacts.

ii. Construction Materials and Waste. No liquid or solid construction waste shall be dumped on the ground within the critical root zone of any native tree. The critical root zone areas are not for storage of materials. No waste or contaminated water shall be dumped on the ground or into any grate between the outer edge of the critical root zone and the base of the oak trees, or uphill from any oak tree where such substance might reach the roots through a leaching process.

iii. No Permanent Irrigation within the Dripline of Existing Oaks. No permanent irrigation shall occur within the dripline of any existing oak tree

6. **Correct Damage to Oaks.** The applicant shall be responsible for correcting any damage to oak trees on the property in a manner specified by an arborist approved by the County at the applicant's expense.

a. Impacted Root Treatment. Roots impacted during construction (e.g., trenching or grading operations) shall be treated by the arborist on a case-by-case basis using best practices, such as clean cuts accompanied by application of appropriate fungicides and insecticides by a licensed pest control applicator.

b. Soil Aeration Methods. Soils within the critical root zone that have been compacted by heavy equipment and/or construction

Project Component	Impacts	Mitigation Measures	Residual Impacts

activities must be returned to their original state before all work is completed. Methods include water jetting, adding organic matter, and boring small holes with an auger (18 inches deep, 2–3 feet apart with a 2–4-inch auger) and the application of moderate amounts of nitrogen fertilizer. The arborist(s) shall advise.

c. Chip Mulch. All impacted areas within the critical root zone of the trees shall receive a 4- to 6-inch layer of chip mulch to retain moisture, retain soil structure, and reduce the effects of soil compaction.

d. Landscape. All landscape within the critical root zone shall consist of drought-tolerant or native varieties. Lawns shall be avoided. All irrigation trenching shall be routed around critical root zones, otherwise aboveground drip irrigation shall be used. It is the owner's responsibility to notify the landscape contractor regarding this mitigation. For this site, it is strongly recommended that drought-tolerant native landscape is used with the approval of the arborist. This includes all sidewalk/greenbelt areas.

e. Fertilization and Cultural Practices. As the project moves toward completion, the arborist(s) may suggest either fertilization and/or mycorrhizal inoculation applications that will benefit tree health. Application of mycorrhizal inoculum offers several benefits to the host plant, including faster growth, improved nutrition, greater drought resistance, and protection from pathogens.

f. Post-Construction Tree Inspection. Prior to occupancy of each phase, a letter from the arborist(s) shall be required that verifies health/condition of all impacted trees and provides recommendations for additional mitigation. The letter shall verify that the arborist(s) or their designee were on-site for all grading and/or trenching activity that encroached into the critical root zone of the selected native trees, and that all work in these areas was completed to the standards set forth above.

7. **Arborist Supervision and Treatment of Impacted Trees.** A licensed arborist shall supervise all ground disturbances within the tree protection zone and activities that may impact branches. The arborist shall provide guidance such as temporary damaged root protection, use of air spades, timing between impact and root treatment by arborist, appropriate use of air spade or hand tools to minimize tree damage specific to the action proposed, and to treat root zone and branch damage.

   During and upon completion of construction, the licensed arborist shall provide treatment, as the licensed arborist determines is appropriate, to maintain and improve the health of the tree, including pruning of the broken main stem, and soil supplement and watering programs. All root pruning shall be completed with sharpened hand pruners. Pruned roots

Project Component	Impacts	Mitigation Measures	Residual Impacts
		shall be immediately covered with soil or moist fabric. Damaged roots shall be treated within 24 hours by a qualified tree specialist to inhibit fungus, insects, or other disease damage. 8. **Report Tree Impacts.** Damage to any tree during construction shall be reported to the project arborist within 24 hours. The damage should be treated as soon as possible, as appropriate, by an arborist or his/her designee approved by the County of San Luis Obispo to prevent disease or pest infestation. Damage will be reported to the County of San Luis Obispo and applicant during each month of construction. All monitoring will be documented on the field report form, which will be forwarded to the project manager and County. 9. **Protect Replacement/Mitigation Oaks.** The following activities are not allowed within the root zone of newly planted oak trees: year-round irrigation (no summer watering, unless "establishing" new tree or native compatible plants for up to 7 years), grading (includes cutting and filling of material), compaction (e.g., regular use of vehicles), placement of impermeable surfaces (e.g., pavement), and disturbance of soil that impacts roots (e.g., tilling). 10. **Notes on Plans.** The standards in BIO/mm-18.1(1–7) shall be noted and shown on all grading and building plans, as well as an additional map sheet recorded with any Final Map in order to describe the activities prohibited outside the approved construction envelopes. All trees to be retained within 50 feet of impact areas shall be shown with tree protection zone for groups of trees and critical root zone for individual trees. 11. **Prepare and Implement On-Site Oak Tree Protection, Replacement, and Habitat Restoration Plan.** Prior to recordation of a Final Map for a land division on the property, the developer shall submit a Tree Protection Plan, Tree Replacement Plan (BIO/mm-18.2), and Oak Woodland Habitat Restoration Plan (BIO/mm-18.3) for the review and approval by the County of San Luis Obispo Planning and Building Director. The Oak Tree Protection, Replacement, and Habitat Restoration Plan will be approved by the County of San Luis Obispo and provided to all contractors and subcontractors that work within or adjacent to the critical root zone of native trees. Provisions of the Oak Tree Protection, Replacement, and Habitat Restoration Plan shall be included in the Worker Environmental Training Program to confirm that workers and supervisors are trained in maintaining fencing, protecting root zones, and conforming to all tree protection goals. Each contractor must sign and acknowledge the plan. Any future changes (within the critical root zone) will need project arborist review and implementation of potential mitigation measures before proceeding. 12. **Mitigate Impacts to Preserved Trees.** Damage that occurs to protected retained trees or sensitive habitats resulting from construction activities shall be mitigated in a manner approved by the County of San Luis Obispo Planning and Building Director. Impacts to less than 10% of the	

Project Component	Impacts	Mitigation Measures	Residual Impacts
		tree's critical root zone and canopy shall be mitigated at a 2:1 ratio (plant two trees for each tree impacted). Impacts over 10% and less than 50% of the tree's critical root zone and/or canopy shall be mitigated at a 3:1 ratio. Impacts to more than 50% of the trees' critical root zone shall require mitigation at a 4:1 ratio. See BIO/mm-18.2 for replacement tree performance criteria. Mitigation for impacted trees shall be tracked with the following information: tree tag number, location (latitude/longitude WGS84 datum), number of trunks, diameter at breast height of main trunk, proposed critical root zone impact percent, proposed mitigation ratio, actual impact percent, date of impact (month/year), document if accounted for in approved plans, actual replacement ratio, actual replacement number, date of planting (month/year), location of mitigation planting (Phase and general location), and expected year performance criteria to be met. Quarterly impact and proposed mitigation documentation shall be provided to the County during the active phases of construction. Annual reports shall be provided until the project is completed. **BIO/mm-18.2: Tree Replacement Plan.** Prior to issuance of a grading permit for any future development within the Specific Plan Area, a qualified arborist shall prepare and submit an Oak Tree Replacement Plan for the review and approval by the County of San Luis Obispo Planning and Building Director. The Oak Tree Replacement Plan will be approved by the County of San Luis Obispo and will include a plan for adding native oaks to the landscape planting plan for streets and recreational open spaces. The Oak Tree Replacement Plan shall specify the number of oak trees to be planted based on the following mitigation ratios: 1. **Mitigation for Removed Trees.** Oak trees removed from habitat types not mapped as oak woodland or oak forest in Figure 4.4-2, shall be mitigated for by planting replacement trees at a 4:1 ratio (four trees for each tree removed, e.g., 120 oaks planted for 30 removed). 2. **Mitigation for Impacts to Preserved Trees.** Per BIO/mm-18.1, damage that occurs to protected retained trees resulting from construction activities shall be mitigated for at the following ratios: a. Impacts to less than 10% of a tree's critical root zone and canopy shall be mitigated at a 2:1 ratio (plant two trees for each tree impacted). b. Impacts over 10% and less than 50% of a tree's critical root zone and/or canopy shall be mitigated at a 3:1 ratio (plant three trees for each tree impacted). c. Impacts to more than 50% of a trees' critical root zone and/or canopy shall require mitigation at a 4:1 ratio (plant four trees for each tree impacted). 3. **Criteria for Replacement Trees:**	

Project Component	Impacts	Mitigation Measures	Residual Impacts

a. Mitigation trees may be planted to enhance the on-site oak woodland and/or included in the landscape planting plan but are not allowed in the preserved oak forest habitat.

b. If on-site planting areas are not available, off-site oak habitat mitigation areas shall be calculated at two times 1,750 square feet per tree (assuming a 47-foot-diameter average canopy of trees removed from grassland habitats).

c. Replacement trees shall not be planted within designated fire fuel management zones (i.e., within 100 feet of structures).

d. A minimum of 25% of the oak trees planted in mitigation areas and in on-site restoration areas shall be propagated from acorns collected from on-site oak trees, preferably from those proposed to be removed. All mitigation trees propagated from acorns must reach at least 1-inch in diameter prior to the removal of mature trees.

e. All other mitigation trees must be from Central Coast acorns. All replacement trees shall be at least 1-inch in diameter.

f. Mitigation trees shall be maintained and monitored for a minimum of 7 years and must have reached a minimum height of 6 feet prior to certification of completion.

g. The following activities are not allowed within the root zone of newly planted oak trees: Year-round irrigation (no summer watering, unless “establishing” new tree or native compatible plants for up to 7 years), grading (includes cutting and filling of material), compaction (e.g., regular use of vehicles), placement of impermeable surfaces (e.g., pavement), and disturbance of soil that impacts roots (e.g., tilling).

In addition to oaks, the Oak Tree Replacement Plan shall include plants typical of Nipomo Mesa native oak woodlands in open space planting palettes, as well as herbs and shrubs that thrive near oaks, and generally require less irrigation than some of the landscaping commonly employed on the Central Coast. The table below provides appropriate plants associated with oak trees, including species found on the Dana Reserve. This list includes several with California Rare Plant Rank status. The landscape planting plan shall include common native understory species, such as western nettle and California plantain, as they may be naturally present in native landscapes and allowed to be retained by maintenance crews during restoration and site maintenance. Special-status species should be encouraged to be represented in the native plant landscape plan, especially in areas where already present or in the vicinity.

Recommended Native Plant Species for Landscaping

Scientific Name	Common Name	Special Status

Shrubs – 12 Native Taxa		
Artemisia californica	California sagebrush	--
Ceanothus impressus var. *nipomensis*	Nipomo Mesa ceanothus	CRPR 1B.2
Ceanothus cuneatus var. *fascicularis*	Sand buck brush	CRPR 4.2
Cercocarpus betuloides var. *betuloides*	Birch-leaf mountain-mahogany	--
Frangula californica	California coffee berry	--
Heteromeles arbutifolia	Toyon	--
Prunus ilicifolia	Hollyleaf cherry	--
Prunus fasciculata var. *punctata*	Sand almond	CRPR 4.3
Rhamnus crocea	Spiny redberry	--
Salvia mellifera	Black sage	--
Sambucus nigra ssp. *caerulea*	Blue elderberry	--
Symphoricarpos mollis	Creeping snowberry	--
Forbs – Annual and Perennial Native Taxa		
Acmispon americanus	American bird's foot trefoil	--
Acmispon glaber	Deer weed	--
Anaphalis margaritacea	Pearly everlasting	--
Asclepias eriocarpa	Kotolo	--
Cirsium occidentale	Cobweb thistle	--
Clarkia purpurea ssp. *viminea*	Wine cup Clarkia	--
Claytonia parviflora ssp. *parviflora*	Miner's lettuce	--
Corethrogyne filaginifolia	Common tansyaster	--
Dichelostemma capitatum ssp. *capitatum*	Blue dicks	--
Diplacus aurantiacus	Sticky monkeyflower	--
Helianthemum scoparium	Broom rose	--
Hesperocnide tenella	Western nettle	--

Project Component	Impacts	Mitigation Measures			Residual Impacts
		Heterotheca grandiflora	Telegraph weed	--	
		Horkelia cuneata var. *puberula*	Mesa horkelia	CRPR 1B.1	
		Lupinus bicolor	Miniature lupine	--	
		Lupinus nanus	Sky lupine	--	
		Lupinus truncatus	Blunt leaved lupine	--	
		Paeonia californica	California peony	--	
		Pedicularis densiflora	Warrior's plume	--	
		Phacelia ramosissima	Branching phacelia	--	
		Phacelia tanacetifolia	Lacy phacelia	--	
		Pholistoma auritum	Fiesta flower	--	
		Piperia michaelii	Michael's rein orchid	CRPR 4.2	
		Plantago erecta	California plantain	--	
		Pseudognaphalium californicum	Ladies' tobacco	--	
		Pterostegia drymarioides	Fairy mist	--	
		Silene laciniata	Cardinal catchfly	--	
		Solanum americanum	Common nightshade	--	
		Solanum xanti	Chaparral nightshade	--	
		BIO/mm-18.3: Protect On-Site Oak Woodland Resources Intended to be Retained and Preserved On-Site. Prior to issuance of a grading permit for any future development within the Specific Plan Area, the applicant shall submit an Oak Woodland Protection and Restoration Plan to be reviewed and approved by the County of San Luis Obispo Planning and Building Department. Coast live oak forest, woodland, and retained trees within 50 feet of development shall be shown on all grading and development plans. The plan shall be prepared by a qualified individual acceptable to the County of San Luis Obispo Director of Planning and Building. The plan shall specify short- and long-term management actions necessary to preserve and enhance the on-site biological open space and will include sections for (1) habitat protection, (2) monitoring during project construction, (3) reporting, (4) oak tree replacement planting, (5) rare plant mitigation planting and protection, and (6) wildlife habitat protection. The plan shall include (7) a fuel management component that provides measures to protect native understory vegetation and downed woody debris in a manner that optimizes wildlife habitat protection and reduces fire risk to neighborhoods.			

Project Component	Impacts	Mitigation Measures	Residual Impacts
		Fire fuel management shall address reduction of fire fuel loads within 100 feet of structures. The first 30 feet from residences/structures (e.g., the back of yards) shall be maintained to remove dead plant material, and trees shall be maintained to keep branches 10 feet from other trees. In the next 70 feet, annual grass shall be cut or grazed to a maximum average height of 4 inches. A horizontal space shall be created between patches of native shrubs. Fallen branches, twigs, and bark shall be removed to reduce total fuel load. Patches of live shrubs shall be retained, and patches of annual wildflowers shall be mowed/grazed after seeds have set. Young trees that are in shrub-form shall be shaped to minimize fuel load but allow for trees to protect their trunks during the growth period. Heavy branches of mature trees at least 6 feet from the ground shall be removed per California Department of Forestry and Fire Protection's "Prepare for Wildfire" recommendations to maintain defensible space. Management of defensible space (100 feet from structures and 10 feet from roads) must protect special-status plant and wildlife taxa as specified in Mitigation Measures BIO/mm 1.1 through BIO/mm-1.1 through BIO/mm-1.6, BIO/mm-2.1 through BIO/mm-2.3, BIO/mm-3.1, BIO/mm-4.1 and BIO/mm-4.2, BIO/mm-5.1, BIO/mm-6.1, BIO/mm-7.1, BIO/mm-8.1, BIO/mm-9.1, and BIO/mm-14.1. **BIO/mm-18.4: Off-Site Preservation.** Prior to recordation of a Final Map for a land division over the Specific Plan Area, the applicant shall protect coast live oak forest (*Quercus agrifolia* / *Toxicodendron diversilobum* association) and coast live oak woodland (*Quercus agrifolia* / *Adenostoma fasciculatum* – [*Salvia mellifera*] association) at a ratio of 2:1 (2 acres conserved for each acre removed). A conservation easement over the protected habitat shall be controlled by a qualified conservation organization approved by the County of San Luis Obispo. Potential conservation organizations include, but are not limited to, The Nature Conservancy, Land Conservancy of San Luis Obispo County, Greenspace, or Cambria Land Trust. Applicant-Proposed Mitigation: The applicant proposes to conserve 187 acres of coast live oak woodland and 67.5 acres of coast live oak forest that is intermixed with the 95.9 acres of chamise chaparral, 19.2 acres of La Panza manzanita chaparral, and 26.4 acres of annual grassland on the Dana Ridge Ranch. This property is located southeast of Dana Reserve (see Figure 4.4-13). Habitat descriptions, a plant list, and figures associated with this off-site mitigation location are detailed in Althouse and Meade (2021). The project proposes to impact 21.7 acres of coast live oak forest and 75.3 acres of coast live oak woodland (97.0 acres total). The applicant's proposed mitigation on Dana Ridge Ranch would yield a mitigation ratio of 3.1:1 for coast live oak forest and 2.5:1 for coast live oak woodland habitats. No restoration or replacement of removed oak trees is proposed.	
Off-Site Improvements	**BIO Impact 19:** Off-site transportation improvements and/or trenching of new water and wastewater pipelines could result in direct and indirect impacts to oak trees.	**BIO/mm-19.1: Oak Tree Monitoring.** Impacts to oak trees shall be avoided where feasible. Impacts include any ground disturbance or soil compaction within the dripline or critical root zone of the trees (whichever distance is greater). A qualified arborist shall determine the critical root zone for each oak tree within the path of the pipeline alignments. Ground disturbance shall be supervised by a licensed arborist if excavation is proposed within the critical root zone of an oak tree. The arborist shall supervise all trenching within the critical root zone. The arborist shall provide guidance such as temporary damaged root protection, use of air spades, timing between impact and root treatment by arborist, appropriate use of air spade or hand	Residual impacts would be less than significant with mitigation (Class II)

Project Component	Impacts	Mitigation Measures	Residual Impacts
		tools to minimize tree damage specific to the action proposed, and to treat root zone and branch damage. During and upon completion of construction, the licensed arborist shall provide treatment, as the licensed arborist determines is appropriate, to maintain and improve the health of the tree, including pruning of the broken main stem, and soil supplement and watering programs. All root pruning shall be completed with sharpened hand pruners. Pruned roots shall be immediately covered with soil or moist fabric. Damaged roots shall be treated within 24 hours by a qualified tree specialist to inhibit fungus, insects, or other disease damage.	
Cumulative	**BIO Impact 20:** The project would have cumulatively considerable impacts related to biological resources.	Implement Mitigation Measures **BIO/mm-1.1 through BIO/mm-1.6, BIO/mm-2.1 through BIO/mm-2.3, BIO/mm-3.1, BIO/mm-4.1 and BIO/mm-4.2, BIO/mm-5.1, BIO/mm-6.1, BIO/mm-7.1, BIO/mm-8.1, BIO/mm-9.1, BIO/mm-11.1, BIO/mm-12.1, BIO/mm-13.1, BIO/mm-14.1, BIO/mm-15.1, BIO/mm-16.1, BIO/mm-17.1 through BIO/mm-17.3, BIO/mm-18.1 through BIO/mm-18.4, and BIO/mm-19.1**.	Residual impacts would be significant and unavoidable (Class I)
Cultural Resources			
Off-Site Improvements	**CR Impact 1:** Off-site improvements could result in adverse effects to historical resources.	**CR/mm-1.1: Prepare Historical Resources Evaluation.** Prior to development of off-site improvements, a qualified architectural historian will conduct a review to determine the presence of historical resources and/or the potential for the improvements to affect historical resources and prepare a report that details the evaluation methodology, findings, and recommended mitigation measures to avoid and/or minimize potential impacts. The report shall be submitted to the Nipomo Community Services District for implementation and to the County of San Luis Obispo Planning and Building Department for verification of compliance with this measure.	Residual impacts would be less than significant with mitigation (Class II)
Specific Plan Area	CR Impact 2: Future project-related ground-disturbing activities and indirect impacts related to the use and occupation of the Specific Plan Area could result in disturbance and destruction of known archaeological resources P-40-002132, P-40-002273, and DR-001.	**CR/mm-2.1: Environmentally Sensitive Areas.** The Extended Phase I study identified areas within each resource that contain subsurface deposits, which have higher potential to yield important information. Although abundant within the project area, non-diagnostic surface artifacts generally lack significant data potential. As such, the localized portions of each respective resource that contain evidence of subsurface deposits shall be avoided. These areas shall be labeled as Environmentally Sensitive Areas on construction plans for initial site preparation and infrastructure establishment, as well as construction plans for all future phases of the project. Highly visible temporary construction fencing shall be installed along the boundary and shall remain in place during initial ground disturbance. To the greatest extent feasible, no ground disturbance, construction worker foot traffic, storage of materials, or storage or use of equipment shall occur within 50 feet of the Environmentally Sensitive Areas. If an Environmentally Sensitive Area will be accessible by occupants or visitors to the development, the Environmentally Sensitive Area shall be clearly marked, and designated trails will be established to ensure that no future impacts to the Environmentally Sensitive Areas occur as a result of the project. Where feasible, native vegetation shall be planted and maintained in a way that protects off-trail	Residual impacts would be less than significant with mitigation (Class II)

Project Component	Impacts	Mitigation Measures	Residual Impacts
		activity within the Environmentally Sensitive Area(s) and minimizes impacts from planting, irrigation, and use for the life of the project. **CR/mm-2.2: Data Recovery Plan.** If a resource cannot be protected and avoided as an Environmentally Sensitive Area as described in CR/mm-2.1, the applicant shall retain a County of San Luis Obispo-qualified archaeologist to conduct and implement resource-specific data recovery prior to initial site preparation and infrastructure establishment, as well as prior to construction of all future phases of the project occurring within 50 feet of an Environmentally Sensitive Area. Prior to implementation of data recovery, a County-qualified archaeologist shall prepare a Data Recovery Plan outlining the goals and methods for conducting and reporting on the work. The Data Recovery Plan will include, but not be limited to: 1. Research design; 2. Excavation methodology; 3. Curation or repatriation plan; 4. Treatment of human remains; 5. Proposed sample size; 6. Proposed excavation locations; and 7. Coordination with local tribal groups. The Data Recovery Plan will be tailored to the level of physical disturbance at each resource (if any). As the full extent of proposed disturbance cannot be determined at this time, it is not practical to include the preparation of the Data Recovery Plan as part of this Environmental Impact Report. The Data Recovery Plan will be prepared in direct coordination with local tribal groups and shall be submitted to the County of San Luis Obispo Planning and Building Department for review and approval. **CR/mm-2.3: Cultural Resources Protection Plan.** In addition to the resource-specific Data Recovery program, a County of San Luis Obispo -qualified archaeologist shall prepare a Cultural Resources Protection Plan to ensure impacts to unknown resources are avoided or minimized during all future phases of the project, including off-site improvements. The Cultural Resources Protection Plan shall include, but not be limited to, the following provisions: 1. List of personnel involved in the observation and oversight activities; 2. Description of how monitoring will occur; 3. Description of frequency of monitoring (e.g., full-time, part time, spot checking); 4. Description of what resources are expected to be encountered; 5. Description of circumstances that would result in the halting of work at the project site (e.g., what is considered significant archaeological resources?); 6. Description of procedures for halting work on the site and notification procedures; 7. Description of reporting procedures; and 8. Consultation with appropriate Chumash tribal representatives.	

Project Component	Impacts	Mitigation Measures	Residual Impacts
		The Cultural Resources Protection Plan shall outline how and when archaeological and/or tribal monitoring may occur during initial project activities. The intent of the Cultural Resources Protection Plan is to ensure avoidance of adverse impacts to resources protected as Environmentally Sensitive Areas and to ensure proper treatment in the case unknown resources are inadvertently discovered during project implementation. **CR/mm-2.4: Worker Awareness Training.** Prior to construction activities, the applicant shall have a County of San Luis Obispo-qualified archaeologist and a tribal representative conduct a cultural resources training for all construction personnel, including the following: 1. Review the types of archaeological artifacts that may be uncovered; 2. Provide examples of common archaeological artifacts to examine; 3. Review what makes an archaeological resource significant to archaeologists and local Native Americans; 4. Describe procedures for notifying involved or interested parties in case of a new discovery; 5. Describe reporting requirements and responsibilities of construction personnel; 6. Review procedures that shall be used to record, evaluate, and mitigate new discoveries; and, 7. Describe procedures that would be followed in the case of discovery of disturbed and/or intact human burials and burial-associated artifacts.	
Off-Site Improvements	**CR Impact 3:** Off-site improvements could result in adverse effects to archaeological resources.	Implement Mitigation Measures **CR/mm-2.3 and CR/mm-2.4**. **CR/mm-3.1: Retain Archaeologist.** Prior to development of off-site improvements, a County of San Luis Obispo-qualified archaeologist shall be retained by the applicant to conduct a review of California Historical Resources Information System records search data to determine the presence of known resources and determine if the off-site improvement areas have been previously subject to archaeological study, and whether the study adequately addresses the potential for archaeological resources to occur within the disturbance area associated with implementation of the project. If it is determined a study has not been conducted or existing research does not meet California Environmental Quality Act requirements for the identification and treatment of California Register of Historical Resources-eligible resources, a new study shall be conducted. The study shall identify archaeological resources that have the potential to be impacted by future development and provide mitigation measures to avoid and/or minimize potential impacts. Additional tasks, such as Native American coordination, Phase II archaeological testing, Phase III data recovery, and historic research, shall be conducted as necessary. The study shall identify cultural resources that have the potential to be impacted by future development and identify resource-specific mitigation measures to avoid and/or minimize potential impacts. The study shall be submitted to the County of San Luis	Residual impacts would be less than significant with mitigation (Class II)

Project Component	Impacts	Mitigation Measures	Residual Impacts
		Obispo Planning and Building Department prior to initiation of site preparation for off-site improvements.	
Specific Plan Area	**CR Impact 4:** Future project-related ground-disturbing activities and indirect impacts related to the use and occupation of the Specific Plan Area could result in disturbance and destruction of unknown human remains.	Implement Mitigation Measures **CR/mm-2.3 and CR/mm-2.4**.	Residual impacts would be less than significant with mitigation (Class II)
Off-Site Improvements	**CR Impact 5:** Off-site improvements could result in disturbance and destruction of unknown human remains.	Implement Mitigation Measures **CR/mm-2.3 and CR/mm-2.4**.	Residual impacts would be less than significant with mitigation (Class II)
Cumulative	**CR Impact 6:** Project implementation may result in the cumulative disturbance and destruction of historic resources, including archaeological and historical resources pursuant to State CEQA Guidelines Section 15064.5, and human remains.	Implement Mitigation Measures **CR/mm-1.1, CR/mm-2.1 through CR/mm-2.4, and CR/mm-3.1**.	Residual impacts would be less than significant with mitigation (Class II)
Energy			
Specific Plan Area	**EN Impact 1:** The project could result in wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation.	Implement Mitigation Measures **AQ/mm-3.1, AQ/mm-3.3, and TR/mm-3.1**.	Residual impacts would be less than significant with mitigation (Class II)
Off-Site Improvements	**EN Impact 2:** Off-site improvements could result in wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation.	Implement Mitigation Measure **AQ/mm-3.1**.	Residual impacts would be less than significant with mitigation (Class II)
Specific Plan Area	**EN Impact 3:** The project could conflict with or obstruct a state or local plan for renewable energy or energy efficiency.	Implement Mitigation Measure **AQ/mm-3.3**.	Residual impacts would be less than significant with mitigation (Class II)
Off-Site Improvements	**EN Impact 4:** Off-site improvements could conflict with or obstruct a state or local plan for renewable energy or energy efficiency.	Implement Mitigation Measure **AQ/mm-3.1**.	Residual impacts would be less than significant with mitigation (Class II)

Project Component	Impacts	Mitigation Measures	Residual Impacts
Cumulative	**EN Impact 5:** The project would not result in a cumulatively considerable impact to energy resources.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)
Geology and Soils			
Specific Plan Area	**GEO Impact 1:** The project could directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, seismic ground shaking, or seismic-related ground failure.	**GEO/mm-1.1: Foundations.** The following recommendations shall be incorporated into the design criteria for future development of the Specific Plan Area: 1. Conventional continuous and spread footings bearing on compacted soils may be used to support the new structures. Grade beams shall also be placed across all large entrances into the buildings. Footings and grade beams shall have a minimum depth of 12 inches below lowest adjacent grade; however, footings and grade beams for commercial buildings and residential buildings two stories or greater shall have a minimum depth of 18 inches below lowest adjacent grade. All spread footings shall be a minimum of 2 square feet. Footing and grade beam dimensions shall also conform to the applicable requirements of Section 1809 of the 2019 California Building Code. Footing reinforcement shall be in accordance with the requirements of the architect/engineer; minimum continuous footing and grade beam reinforcement shall consist of two No. 4 rebar, one near the top and one near the bottom of the footing. 2. Footings shall be designed using a maximum allowable bearing capacity of 2,000 pounds per square foot (psf) dead plus live load. The allowable bearing capacity may be increased by 200 psf for each additional 6 inches of embedment below a depth of 12 inches below lowest adjacent grade. The allowable bearing capacity shall not exceed 3,000 psf dead plus live loads. Using these criteria, maximum total and differential settlement under static conditions are expected to be on the order of 3/4-inch and 1/4-inch in 25 feet, respectively. Footings shall also be designed to withstand total and differential dynamic settlement of 1/2-inch and 1/4-inch across the largest building dimension, respectively. 3. Lateral loads may be resisted by soil friction and by passive resistance of the soil acting on foundations. Lateral capacity is based on the assumption that backfill adjacent to foundations is properly compacted. A passive equivalent fluid pressure of 375 pounds per cubic foot (pcf) and a coefficient of friction of 0.39 may be used in design. No safety, load, and/or other factors have been applied to any of the values. 4. The allowable bearing capacity may be increased by one-third when transient loads, such as wind or seismicity, are included if the structural engineer determines they are allowed per Sections 1605.3.1 and 1605.3.2 of the 2019 California Building Code. The following seismic parameters are presented for use in structural design.	Residual impacts would be less than significant with mitigation (Class II)

Project Component	Impacts	Mitigation Measures	Residual Impacts

2019 Mapped CBC Values		Site Class "D" Adjusted Values				Design Values	
Seismic Parameters	**Values (g)**	**Site Coefficients**	**Values (g)**	**Seismic Parameters**	**Values (g)**	**Seismic Parameters**	**Values (g)**
S_S	1.056	F_a	1.078*	S_{MS}	1.138	S_{DS}	0.759*
S_1	0.386	F_V	1.914	S_{M1}	0.739	S_{D1}	0.493

Peak Mean Ground Acceleration (PGA_M) = 0.527g

Seismic Design Criteria = D

*F_a should be taken as 1.4 and S_{DS} as 0.996 if the Simplified Lateral Force Analysis Procedure in Section 12.14.8 of the American Society of Civil Engineers Publications is used in structural design

5. Foundation excavations shall be observed by the geotechnical engineer prior to placement of reinforcing steel or any formwork. Foundation excavations shall be thoroughly moistened prior to Portland cement concrete placement and no desiccation cracks shall be present.

Off-Site Improvements	**GEO Impact 2:** Off-site improvements could directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, seismic ground shaking, or seismic-related ground failure.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)
Specific Plan Area	**GEO Impact 3:** The project could result in substantial soil erosion or the loss of topsoil during future construction activities.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)
Off-Site Improvements	**GEO Impact 4:** Off-site improvements could result in substantial soil erosion or the loss of topsoil during future construction activities.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)
Specific Plan Area	**GEO Impact 5:** The project may be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.	Implement Mitigation Measure **GEO/mm-1.1**. **Site Preparation.** 1. The existing ground surface in the building and surface improvements areas shall be prepared for construction by removing existing improvements, vegetation, large roots, debris, and other deleterious material. Any existing fill soils shall be completely removed and replaced as compacted fill. Any existing utilities that will not remain in service shall be removed or properly abandoned; the appropriate method of utility	Residual impacts would be less than significant with mitigation (Class II)

Project Component	Impacts	Mitigation Measures	Residual Impacts
		abandonment will depend upon the type and depth of the utility. Recommendations for abandonment can be made as necessary. 2. Voids created by the removal of materials or utilities, and extending below the recommended overexcavation depth, shall be immediately called to the attention of the geotechnical engineer. No fill shall be placed unless the geotechnical engineer has observed the underlying soil. **GEO/mm-5.2: Grading.** 1. Following site preparation, the soils in the building area for one- and two-story buildings shall be removed to a level plane at a minimum depth of 3 feet below the bottom of the deepest footing or 4 feet below existing grade, whichever is deeper. The soils in the building area for three- and four-story buildings shall be removed to a level plane at a minimum depth of 4 feet below the bottom of the deepest footing or 5 feet below existing grade, whichever is deeper. During construction, locally deeper removals may be recommended based on field conditions. The resulting soil surface shall then be scarified, moisture conditioned, and compacted prior to placing any fill soil. 2. In addition to the recommendations of measure 1, all cut or cut/fill transition areas shall be overexcavated such that a minimum of 5 feet of compacted fill is provided within all the building areas. Also, the minimum depth of the fill below the building area shall not be less than half of the maximum depth of fill below the building area. For example, if the maximum depth of fill below the building area is 20 feet, then the minimum depth of fill below the same building area grades shall be no less than 10 feet. In no case shall the depth of fill be less than 5 feet on the building areas. 3. Following site preparation, the soils in the surface improvement area shall be removed to a level plane at a minimum depth of 1 foot below the proposed subgrade elevation or 2 feet below the existing ground surface, whichever is deeper. During construction, locally deeper removals may be recommended based on field conditions. The resulting soil surface shall then be scarified, moisture conditioned, and compacted prior to placing any fill soil. 4. Following site preparation, the soils in fill areas beyond the building and surface improvement areas shall be removed to a depth of 2 feet below existing grade. During construction, locally deeper removals may be recommended based on field conditions. The resulting soil surface shall then be scarified, moisture conditioned, and compacted prior to placing any fill soil. 5. Voids created by dislodging cobbles and/or debris during scarification shall be backfilled and compacted, and the dislodged materials shall be removed from the area of work. 6. On-site material and approved import materials may be used as general fill. All imported soil shall be non-expansive. The proposed imported soils	

Project Component	Impacts	Mitigation Measures	Residual Impacts
		shall be evaluated by the geotechnical engineer before being used, and on an intermittent basis during placement on the site. 7. All materials used as fill shall be cleaned of any debris and rocks larger than 6 inches in diameter. No rocks larger than 3 inches in diameter shall be used within the upper 3 feet of finish grade. When fill material includes rocks, the rocks shall be placed in a sufficient soil matrix to ensure that voids caused by nesting of the rocks will not occur and that the fill can be properly compacted. 8. Soils are estimated to shrink by approximately 15% to 20% when prepared and graded as recommended above. **GEO/mm-5.3: Project Design, Construction Observation, and Testing.** 1. A geotechnical engineer shall be retained to provide consultation during the design phase, aid in incorporating recommendations of this report in future project design, review final plans once they are available, interpret this report during construction, and provide construction monitoring in the form of testing and observation. 2. At a minimum, the geotechnical engineer shall be retained to provide: a. Review of final grading, utility, and foundation plans; b. Professional observation during grading, foundation excavations, and trench backfill; c. Oversight of compaction testing during grading; and d. Oversight of special inspection during grading; 3. Special inspection of grading shall be provided as per California Building Code Section 1705.6 and Table 1705.6. The special inspector shall be under the direction of the geotechnical engineer. Special inspection of the following items shall be provided by the special inspector: a. Stripping and clearing of vegetation b. Overexcavation to the recommended depths c. Scarification, moisture conditioning, and compaction of the soil d. Fill quality, placement, and compaction e. Utility trench backfill f. Retaining wall drains and backfill g. Foundation excavations h. Subgrade and aggregate base compaction and proof rolling 4. A program of quality control shall be developed prior to beginning grading. The contractor or project manager shall determine any additional inspection items required by the architect/engineer or the governing jurisdiction. 5. Locations and frequency of compaction tests shall be as per the recommendation of the geotechnical engineer at the time of construction. The recommended test location and frequency may be subject to	

Project Component	Impacts	Mitigation Measures	Residual Impacts
		modification by the geotechnical engineer, based on soil and moisture conditions encountered, size and type of equipment used by the contractor, the general trend of the results of compaction tests, or other factors. 6. The geotechnical engineer shall be notified at least 48 hours prior to beginning construction operations.	
Off-Site Improvements	**GEO Impact 6:** The project may be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)
Off-Site Improvements	**GEO Impact 7:** Off-site improvements may be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)
Specific Plan Area	**GEO Impact 8:** Paleontological resources could be present in geological units that underlay the Specific Plan Area, and ground-disturbing activities could damage paleontological resources that may be present below the surface.	**GEO/mm-8.1:** ***Preparation of a Paleontological Resources Monitoring and Mitigation Plan.*** A qualified paleontologist, meeting the standards of the Society of Vertebrate Paleontology (2010), shall be retained prior to the approval of grading permits. The qualified paleontologist shall develop a Paleontological Resources Monitoring and Mitigation Plan for all ground-disturbing activities, provide mitigation measures to reduce potential impacts when existing information indicates that a site proposed for development may contain paleontological resources, and report to the site in the event potential paleontological resources are encountered. **GEO/mm-8.2:** ***Worker Environmental Awareness Program.*** The qualified paleontologist shall conduct a Worker Environmental Awareness Program for all construction workers prior to the start of ground-disturbing activities (including vegetation removal, pavement removal, etc.). In the event construction crews are phased, additional trainings shall be conducted for new construction personnel. The training session shall focus on the recognition of the types of paleontological resources that could be encountered within the project site and the procedures to be followed if they are found. This information may be presented to contractors and their staff through the use of in-person "tailgate" meetings or other mechanisms (e.g., handouts). Documentation shall be retained demonstrating that all construction personnel attended the training. **GEO/mm-8.3: Paleontological Monitoring and Handling of Resources Inadvertently Discovered during Ground-Disturbing Activities.** Part-time/on-call paleontological resources monitoring shall be conducted by a qualified paleontologist who meets the standards of the Society of Vertebrate Paleontology (2010), for all ground-disturbing activities that occur in previously undisturbed sediments, as outlined in the Paleontological Resources Monitoring and Mitigation Plan prepared to satisfy Mitigation Measure GEO/mm-8.1. If required per the requirements of the Paleontological Resources Monitoring and Mitigation Plan, the	Residual impacts would be less than significant with mitigation (Class II)

Project Component	Impacts	Mitigation Measures	Residual Impacts
		qualified paleontologist shall spot check the excavation on an intermittent basis and recommend whether the depth of required monitoring shall be revised based on his/her observations. Monitors shall have the authority to temporarily halt or divert work away from exposed fossils in order to recover the fossil specimens. Any significant fossils collected during project-related excavations shall be prepared to the point of identification and curated into an accredited repository with retrievable storage as designated in the Paleontological Resources Monitoring and Mitigation Plan. Monitors shall prepare daily logs detailing the types of activities and soils observed and any discoveries. The qualified paleontologist shall prepare a final monitoring and mitigation report to document the results of the monitoring effort. If construction or other project personnel discover any potential fossils during construction, regardless of the depth of work or location, work at the discovery location shall cease in a 50-foot radius of the discovery until the qualified paleontologist has assessed the discovery and made recommendations as to the appropriate treatment. If the find is deemed significant, it shall be salvaged following the standards of the Society of Vertebrate Paleontology (2010) and curated with a certified repository.	
Off-Site Improvements	**GEO Impact 9:** Paleontological resources could be present in geological units that underlay the area of off-site improvements, and ground-disturbing activities could damage paleontological resources that may be present below the surface.	Implement Mitigation Measures **GEO/mm-8.1 through GEO/mm-8.3**.	Residual impacts would be less than significant with mitigation (Class II)
Cumulative	**GEO Impact 10:** The project would not result in a cumulatively considerable impact to geology and soils.	Implement Mitigation Measures **GEO/mm-1.1, GEO/mm-5.1, GEO/mm-5.2, and GEO/mm-5.3, GEO/mm-8.1, GEO/mm-8.2, and GEO/mm-8.3**.	Residual impacts would be less than significant with mitigation (Class II)
Greenhouse Gas Emissions			
Specific Plan Area	**GHG Impact 1:** The project could generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.	Implement Mitigation Measures **AQ/mm-3.1, AQ/mm-3.3, and TR/mm-3.1**. **GHG/mm-1.1:** The following measures shall be implemented to reduce project-generated emissions of greenhouse gases: 1. To the extent practical, the proposed project shall reuse and recycle construction waste, including, but not limited to, soil, vegetation, concrete, lumber, metal, and cardboard. 2. The servicing of residential development by natural gas shall be prohibited. To the extent possible, nonresidential development shall install electrically powered appliances and building mechanical equipment in place of natural gas-fueled equipment. 3. Encourage future land uses to participate in Central Coast Community Energy as the electricity provider if it is an option that would be available at the time of occupancy.	Residual impacts would be less than significant with mitigation (Class II)

Project Component	Impacts	Mitigation Measures	Residual Impacts
		4. The project shall provide organic waste pick up and shall provide the appropriate on-site enclosures consistent with County requirements. 5. The project shall be designed to incorporate drought-resistant and native plants. 6. The project shall be designed to incorporate water-efficient irrigation systems. 7. The project shall be designed to incorporate low-flow water fixtures. 8. The project shall install high-reflectance roofing materials (e.g., U.S. Environmental Protection Agency "Energy Star"-rated), to the extent practical, to reduce building heat absorption and summer energy costs. 9. The electrical systems for single-family homes shall be designed with sufficient capacity to accommodate Level 2 residential-use electric vehicle chargers.	
Off-Site Improvements	**GHG Impact 2:** Off-site improvements could generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.	Implement Mitigation Measure **AQ/mm-3.1**.	Residual impacts would be less than significant with mitigation (Class II)
Specific Plan Area	**GHG Impact 3:** The project would conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.	Implement Mitigation Measures **AQ/mm-3.1**, **AQ/mm-3.3**, **GHG/mm-1.1**, and **TR/mm-3.1**.	Residual impacts would be significant and unavoidable (Class I)
Off-Site Improvements	**GHG Impact 4:** Off-site improvements could conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)
Cumulative	**GHG Impact 5:** The project would result in a cumulatively considerable impact to greenhouse gas emissions.	Implement Mitigation Measure **TR/mm-3.1**.	Residual impacts would be significant and unavoidable (Class I)
Hazards and Hazardous Materials			
Specific Plan Area	**HAZ Impact 1:** The project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)

Project Component	Impacts	Mitigation Measures	Residual Impacts
Off-Site Improvements	**HAZ Impact 2:** Off-site improvements would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)
Specific Plan Area	**HAZ Impact 3:** The project could create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.	Implement Mitigation Measure **AQ/mm-7.1**.	Residual impacts would be less than significant with mitigation (Class II)
Off-Site Improvements	**HAZ Impact 4:** Off-site improvements could create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.	Implement Mitigation Measures **AQ/mm-7.1 and BIO/mm-16.1 through BIO/mm-16.3**.	Residual impacts would be less than significant with mitigation (Class II)
Specific Plan Area	**HAZ Impact 5:** The project could emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)
Off-Site Improvements	**HAZ Impact 6:** Off-site improvements could emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)
Off-Site Improvements	**HAZ Impact 7:** Off-site improvements would be located near a hazardous materials site pursuant to California Government Code Section 65962.5.	**HAZ/mm-7.1:** Prior to initiation of vegetation removal, demolition activities, or any earth-moving activities within 1,000 feet of any open hazardous materials site pursuant to California Government Code Section 65962.5, the project contractor shall prepare and implement a Hazardous Materials Management Plan that details procedures that will be taken to ensure the appropriate handling, stockpiling, testing, and disposal of excavated materials to prevent the inadvertent release of contaminated soil and demolished materials to the environment during construction activities. Elements of the plan shall include, but would not necessarily be limited to, the following: **Worker Health and Safety** 1. Accident prevention measures. 2. The requirement that all construction crew members be trained regarding best practices for the appropriate handling, stockpiling, testing, and disposal of excavated materials prior to beginning work.	Residual impacts would be less than significant with mitigation (Class II)

Project Component	Impacts	Mitigation Measures	Residual Impacts
		Soil Contamination 1. Procedures for the proper handling, stockpiling, testing, and disposal of excavated materials in accordance with California Code of Regulations Title 14 and Title 22. 2. Soil contamination evaluation and management procedures, including how to properly identify potential contamination (e.g., soil staining, odors, buried material), the requirement that construction activities within a 50-foot radius of potentially contaminated soil be halted until the hazard has been assessed and appropriately addressed, the requirement that access to potentially contaminated areas be limited to properly trained personnel, and procedures for notification and reporting, including internal management and local agencies (e.g., California Department of Forestry and Fire Protection, County of San Luis Obispo Environmental Health Services), as needed. 3. Monitoring of ground-disturbing activities for soil contamination may include visual and organic vapor monitoring by personnel with appropriate hazardous materials training, including 40 hours of Hazardous Waste Operations and Emergency Response (HAZWOPER) training. 4. If visual and organic vapor monitoring indicates signs of suspected contaminated soil, then soil samples shall be collected and analyzed to characterize soil quality. 5. Evaluation of all potentially contaminated materials encountered during project construction activities in accordance with applicable federal, state, and local regulations and/or guidelines governing hazardous waste. All materials deemed to be hazardous shall be remediated and/or disposed of following applicable regulatory agency regulations and/or guidelines. Disposal sites for both remediated and non-remediated soils shall be identified prior to beginning construction. All evaluation, remediation, treatment, and/or disposal of hazardous waste shall be supervised and documented by qualified hazardous waste personnel.	
Specific Plan Area	**HAZ Impact 8:** The project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)
Off-Site Improvements	**HAZ Impact 9:** Off-site improvements would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)
Cumulative	**HAZ Impact 10:** The project would not result in a cumulatively considerable impact to hazards and hazardous materials.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)

Project Component	Impacts	Mitigation Measures	Residual Impacts
Hydrology and Water Quality			
Specific Plan Area	**HYD Impact 1:** The project could violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)
Off-Site Improvements	**HYD Impact 2:** Off-site improvements could violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.	Implement Mitigation Measures **BIO/mm-17.1 through BIO/mm-17.3**.	Residual impacts would be less than significant with mitigation (Class II)
Specific Plan Area	**HYD Impact 3:** The project could substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)
Off-Site Improvements	**HYD Impact 4:** Off-site improvements could substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)
Specific Plan Area	**HYD Impact 5:** The project could substantially alter the existing drainage pattern of the site or increase surface water runoff in a manner that would result in substantial erosion or siltation, flooding, or an exceedance of stormwater drainage systems.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)
Off-Site Improvements	**HYD Impact 6:** Off-site improvements could substantially alter the existing drainage pattern of the site or increase surface water runoff in a manner that would result in substantial erosion or siltation, flooding, or an exceedance of stormwater drainage systems.	Implement Mitigation Measures **BIO/mm-17.1 through BIO/mm-17.3**.	Residual impacts would be less than significant with mitigation (Class II)
Specific Plan Area and Off-Site Improvements	**HYD Impact 7:** The project could conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)
Off-Site Improvements	**HYD Impact 8:** Off-site improvements would not risk the release of pollutants due to project inundation.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)

Project Component	Impacts	Mitigation Measures	Residual Impacts
Cumulative	**HYD Impact 9:** The project would not result in a cumulatively considerable impact to hydrology and water quality.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)
Land Use and Planning			
Specific Plan Area	**LUP Impact 1:** The project would not physically divide an established community.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)
Off-Site Improvements	**LUP Impact 2:** Off-site improvements would not physically divide an established community.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)
Specific Plan Area	**LUP Impact 3:** The project would adversely affect the local jobs-to-housing ratio within the project area and would be inconsistent with Land Use Planning Policy L-3 of the San Luis Obispo County Clean Air Plan.	No feasible mitigation has been identified.	Residual impacts would be significant and unavoidable (Class I)
Specific Plan Area	**LUP Impact 4:** The project would result in an increase in regional VMT and would generate VMT per employee above applicable thresholds; therefore, the project would be potentially inconsistent with Policy AQ 1.2 of the County of San Luis Obispo General Plan Conservation and Open Space Element.	Implement Mitigation Measure **TR/mm-2.1**.	Residual impacts would be less than significant with mitigation (Class II)
Specific Plan Area	**LUP Impact 5:** The project would result in the net loss of CRPR 4 and Watch List plant species, native oak woodland, and sensitive habitats; therefore, the project would be potentially inconsistent with goals and policies of the County of San Luis Obispo General Plan Conservation Open Space Element pertaining to preservation of biological resources and Policy 3.8 of the Parks and Recreation Element.	Implement Mitigation Measures **BIO/mm-2.1 through BIO/mm-2.3, BIO/mm-4.1, BIO/mm-15.1, BIO/mm-16.1, BIO/mm-18.1 through BIO/mm-18.4, and BIO/mm-19.1**.	Residual impacts would be significant and unavoidable (Class I)
Specific Plan Area	**LUP Impact 6:** The project could be inconsistent with Policy 2.2, Goal 2/Objective B, and Policies 6.4, 6.9, and 6.10 of the County of San Luis Obispo General Plan Parks and Recreation Element and three Public Facilities, Services,	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)

Project Component	Impacts	Mitigation Measures	Residual Impacts
	and Resources policies in the South County Inland Area Plan.		
Specific Plan Area	**LUP Impact 7:** The project could be inconsistent with policies within the County of San Luis Obispo General Plan Conservation and Open Space Element, Framework for Planning (Inland), Land Use Ordinance, and South County Inland Area Plan related to preservation of rural visual character, compatibility with the natural landscape, and preservation of views of oak woodlands and other visually significant features.	Implement Mitigation Measures **AES/mm-3.1, AES/mm-3.2, and AES/mm-7.1**.	Residual impacts would be less than significant with mitigation (Class II)
Specific Plan Area	**LUP Impact 8:** The project could be inconsistent with policies in the Sustainable Communities Strategy and County Framework for Planning (Inland) associated with establishment of development and utility services within of existing transit corridors and/or urban reserve line/village reserve line boundaries.	Implement Mitigation Measure **PS/mm-1.1**.	Residual impacts would be less than significant with mitigation (Class II)
Off-Site Improvements	**LUP Impact 9:** Off-site improvements would not conflict with applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)
Cumulative	**LUP Impact 10:** The project would result in cumulative impacts associated with inconsistency with goals and policies identified within the County of San Luis Obispo General Plan Conservation and Open Space Element, Framework for Planning (Inland), Land Use Ordinance, and South County Area Plan regarding preservation and no net loss of sensitive biological resources and preservation of rural visual character.	Implement Mitigation Measures **BIO/mm-2.1 through BIO/mm-2.3, BIO/mm-4.1, BIO/mm-15.1, BIO/mm-16.1, BIO/mm-18.1 through BIO/mm-18.4, BIO/mm-19.1, AES/mm-3.1 through AES/mm-3.3, and AES/mm-7.1**.	Residual impacts would be significant and unavoidable (Class I)
Mineral Resources			
Cumulative	**MR Impact 1:** The project would not result in a cumulatively considerable impact to mineral resources.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)

Project Component	Impacts	Mitigation Measures	Residual Impacts
Noise			
Specific Plan Area	**N Impact 1:** The project would generate a substantial temporary or permanent increase in ambient noise levels in excess of established standards.	**N/mm-1.1:** The following mitigation measures shall be implemented to reduce exposure to short-term construction noise. 1. Unless otherwise provided for in a validly issued permit or approval, noise-generating construction activities should be limited to between the hours of 7:00 a.m. and 7:00 p.m. Noise-generating construction activities should not occur on Sundays or legal holidays. 2. Construction equipment should be properly maintained and equipped with noise-reduction intake and exhaust mufflers and engine shrouds, in accordance with manufacturers' recommendations. Equipment-engine shrouds should be closed during equipment operation. 3. Equipment shall be turned off when not in use for an excess of 5 minutes, except for equipment that requires idling to maintain performance. 4. Construction haul truck routes shall be routed away from nearby noise-sensitive land uses to the extent possible. 5. Staging and queuing areas shall be located at the farthest distance possible from nearby noise-sensitive land use identified in the project area at the time of construction. 6. Stationary equipment (e.g., generators, compressors) shall be located at the farthest distance possible from nearby noise-sensitive land use identified in the project area at the time of construction. 7. A public liaison shall be appointed for project construction and shall be responsible for addressing public concerns related to construction-generated noise, including excessive noise. As needed, the liaison shall determine the cause of the concern (e.g., starting too early, bad muffler) and implement measures to address the concern. Where necessary, additional measures, such as equipment repairs, equipment enclosures, or temporary barriers, shall be implemented to address local concerns. 8. Signage shall be placed at the project site construction entrance(s) to advise the public of anticipated dates of construction. The signage shall include the phone number of the public liaison appointed to address construction-related noise concerns. **N/mm-1.2:** The following mitigation measures shall be implemented to reduce long-term exposure to transportation and non-transportation noise: 1. The County of San Luis Obispo shall require acoustical assessments to be prepared as part of the County development review process for future noise-sensitive land uses located within the projected 60 A-weighted decibels Community Noise Equivalent Level noise contour of U.S. Route 101 (i.e., within 1,005 feet from the centerline of U.S. Route 101, refer to Figure 4 in Environmental Impact Report Appendix I). The acoustical assessments shall address compatibility with the County of San Luis Obispo's noise standards for transportation noise sources. Where the	Residual impacts would be less than significant with mitigation (Class II)

Project Component	Impacts	Mitigation Measures	Residual Impacts
		acoustical assessments determine that transportation noise levels would exceed applicable County noise standards, noise-reduction measures shall be incorporated sufficient to reduce operational noise levels to below applicable noise standards. Such measures may include, but are not limited to, the incorporation of setbacks, sound barriers, or berms. The emphasis of such measures shall be placed upon site planning and project design. (Refer to Table 4.13-6 of this Environmental Impact Report for noise-sensitive land uses and corresponding noise standards.) 2. The County shall require acoustical assessments to be prepared as part of the environmental review process for future commercial land uses involving the proposed installation of exterior noise-generating equipment, including, but not limited to, back-up power generators, trash compactors, amplified public address systems, and commercial-use air conditioning condensers. The acoustical assessments shall evaluate potential noise impacts attributable to the proposed project in comparison to applicable County noise standards for stationary noise sources (refer to Table 4.13-7). The acoustical assessment shall evaluate impacts to nearby existing off-site, as well as future planned on-site, noise-sensitive land uses. Where the acoustical analysis determines that stationary-source noise levels would exceed applicable County noise standards, noise-reduction measures shall be incorporated sufficient to reduce operational noise levels to below applicable noise standards. Such measures may include, but are not limited to, the incorporation of setbacks, sound barriers, berms, hourly limitations, or equipment enclosures. The emphasis of such measures shall be placed upon site planning and project design (see Table 4.13-7 of this Environmental Impact Report for applicable County of San Luis Obispo noise standards).	
Off-Site Improvements	**N Impact 2:** Off-site improvements would generate a substantial temporary or permanent increase in ambient noise levels in excess of established standards.	Implement Mitigation Measure **N/mm-1.1**.	Residual impacts would be less than significant with mitigation (Class II)
Specific Plan Area	**N Impact 3:** The project would not result in the generation of excessive short- or long-term groundborne vibration or noise levels.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)
Off-Site Improvements	**N Impact 4:** Off-site improvements would not result in the generation of excessive short- or long-term groundborne vibration or noise levels.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)

Project Component	Impacts	Mitigation Measures	Residual Impacts
Cumulative	**N Impact 5:** The project would not result in a cumulatively considerable impact to noise.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)
Population and Housing			
Specific Plan Area	**PH Impact 1:** The project would induce substantial unplanned population growth in the Nipomo area.	No feasible mitigation has been identified.	Residual impacts would be significant and unavoidable (Class I)
Off-Site Improvements	**PH Impact 2:** Off-site improvements would not result in substantial unplanned population growth.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)
Specific Plan Area	**PH Impact 3:** The project would not displace existing people or housing.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)
Off-Site Improvements	**PH Impact 4:** Off-site improvements would not displace existing people or housing.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)
Cumulative	**PH Impact 5:** The project would result in a cumulatively considerable impact related to substantial and unplanned population growth.	No feasible mitigation has been identified.	Residual impacts would be significant and unavoidable (Class I)
Public Services			
Specific Plan Area	**PS Impact 1:** The project would result in an increased need for fire protection services.	**Provision of Land for a New Fire Station.** The project applicant shall be required to coordinate with the County of San Luis Obispo and California Department of Forestry and Fire Protection to identify and dedicate land for the future construction and operation of a new fire station in the community of Nipomo. The dedication of land for the new fire station shall be included in the Development Agreement between the project applicant and the County of San Luis Obispo.	Residual impacts would be less than significant with mitigation (Class II)
Specific Plan Area	**PS Impact 2:** The project would not contribute to the existing need for expanded police protection services within the project area.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)

Project Component	Impacts	Mitigation Measures	Residual Impacts
Specific Plan Area	**PS Impact 3:** The project could increase demand on existing LMUSD facilities.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)
Specific Plan Area	**PS Impact 4:** The project could result in an increased demand on public park facilities.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)
Specific Plan Area	**PS Impact 5:** The project could increase demand on library services.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)
Off-Site Improvements	**PS Impact 6:** Off-site improvements would not result in an increased need for fire protection services.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)
Off-Site Improvements	**PS Impact 7:** Off-site improvements would not contribute to the existing need for expanded police protection services within the project area.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)
Off-Site Improvements	**PS Impact 8:** Off-site improvements would not increase demand on existing LMUSD facilities.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)
Off-Site Improvements	**PS Impact 9:** Off-site improvements would not result in an increased demand on public park facilities.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)
Off-Site Improvements	**PS Impact 10:** Off-site improvements would not increase demand on library services.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)
Cumulative	**PS Impact 11:** The project could result in cumulative impacts related to public services.	Implement Mitigation Measure **PS/mm-1.1**.	Residual impacts would be less than significant with mitigation (Class II)

Project Component	Impacts	Mitigation Measures	Residual Impacts
Recreation			
Specific Plan Area	**REC Impact 1:** The project could increase the use of existing neighborhood, community, or regional parks or other recreational facilities, such that substantial physical deterioration of the facility would occur or be accelerated.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)
Off-Site Improvements	**REC Impact 2:** Off-site improvements would not increase the use of existing neighborhood or regional parks or other recreational facilities, such that substantial physical deterioration of the facility would occur or be accelerated.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)
Specific Plan Area	**REC Impact 3:** The project includes the development of recreational facilities that may have an adverse physical effect on the environment.	Implement Mitigation Measures **AES/mm-3.1 and AES/mm-3.2, AQ/mm-3.1 and AQ/mm-3.2, AQ/mm-7.1, BIO/mm-1.1 through BIO/mm-1.6, BIO/mm-2.1 through BIO/mm-2.3, BIO/mm-3.1, BIO/mm-4.1 and BIO/mm-4.2, BIO/mm-5.1, BIO/mm-6.1, BIO/mm-7.1, BIO/mm-8.1, BIO/mm-9.1, BIO/mm-14.1, BIO/mm-15.1, BIO/mm-18.1 through BIO/mm-18.4, CR/mm-1.1 through CR/mm-1.4, GEO/mm-1.1, GEO/mm-5.1 through GEO/mm-5.3, GEO/mm-8.1 through GEO/mm-8.3, N/mm-1.1 and N/mm-1.2, USS/mm-3.1, and WF/mm-3.1**.	Residual impacts would be less than significant with mitigation (Class II)
Cumulative	**REC Impact 4:** The project could result in a cumulatively considerable impact to recreational facilities.	Implement Mitigation Measures **AES/mm-3.1 and AES/mm-3.2, AQ/mm-7.1, BIO/mm-1.1 through BIO/mm-1.6, BIO/mm-2.1 through BIO/mm-2.3, BIO/mm-3.1, BIO/mm-4.1 and BIO/mm-4.2, BIO/mm-5.1, BIO/mm-6.1, BIO/mm-7.1, BIO/mm-8.1, BIO/mm-9.1, BIO/mm-14.1, BIO/mm-15.1, BIO/mm-18.1 through BIO/mm-18.4, CR/mm-1.1 through CR/mm-1.4, HAZ/mm-7.1, GEO/mm-1.1, GEO/mm-5.1 through GEO/mm-5.3, GEO/mm-8.1 through GEO/mm-8.3, N/mm-1.1 and N/mm-1.2, USS/mm-3.1, and WF/mm-3.1**.	Residual impacts would be less than significant with mitigation (Class II)
Transportation			
Specific Plan Area	**TR Impact 1:** Phased implementation of the Specific Plan Area could conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)
Off-Site Improvements	**TR Impact 2:** Off-site improvements could conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)

Project Component	Impacts	Mitigation Measures	Residual Impacts
Specific Plan Area	**TR Impact 3:** Buildout of the Specific Plan Area would exceed the County VMT thresholds and therefore would not be consistent with State CEQA Guidelines Section 15064.3(b). VMT per employee would be incrementally reduced compared to existing conditions; however, the project-related increase in residential VMT per capita and overall VMT would exceed the County VMT thresholds.	**TR/mm-3.1:** A transportation demand management program or identification of transportation demand management strategies to implement would be required of each applicant. The residential, commercial, education, and/or hotel development applicant in consultation with the County of San Luis Obispo will choose feasible transportation demand management strategies and tailor to the development proposal. Potential measures to reduce vehicle miles traveled include, but are not limited to: 1. Improve or increase access to transit 2. Increase access to common goods and services 3. Incorporate affordable housing into the project 4. Orient the project towards transit, bicycle, and pedestrian facilities 5. Improve bicycle and/or pedestrian facilities and/or transit services 6. Limit or eliminate parking supply 7. Implement or provide access to commute reduction programs 8. Provide car-, bike-, and ride-sharing programs 9. Provide transit passes 10. Provide on-site amenities at places of work	Residual impacts would be significant and unavoidable (Class I)
Off-Site Improvements	**TR Impact 4:** Off-site improvements would not generate VMT in a manner that would be inconsistent with State CEQA Guidelines Section 15064.3(b).	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)
Specific Plan Area	**TR Impact 5:** Phased buildout of the Specific Plan Area would not substantially increase hazards due to a geometric design feature or incompatible uses.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)
Off-Site Improvements	**TR Impact 6**: Off-site improvements would not substantially increase hazards due to a geometric design feature or incompatible uses.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)
Specific Plan Area	**TR Impact 7:** Phased buildout of the Specific Plan Area would not result in inadequate emergency access.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)
Off-Site Improvements	**TR Impact 8:** Off-site improvements would not result in inadequate emergency access.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)

Project Component	Impacts	Mitigation Measures	Residual Impacts
Cumulative	**TR Impact 9:** The project would result in a cumulatively considerable impact to transportation and traffic.	Implement Mitigation Measure **TR/mm-3.1**.	Residual impacts would be significant and unavoidable (Class I)
Tribal Cultural Resources			
Specific Plan Area	**TCR Impact 1:** Proposed development of the Specific Plan Area could directly and indirectly impact CRHR-eligible resources and resources considered by the County to be significant pursuant to PRC Section 5024.1 (DR-001, P-40-02132, and P-40-002273).	Implement Mitigation Measures **CR/mm-2.1 through CR/mm-2.4**. **TCR/mm-1.1: Deeded Repatriation Location.** A specific location, protected by a deed restriction, shall be dedicated to repatriate cultural materials encountered during future archaeological study, development, and occupation within the Specific Plan Area. An accessible vault, protected from the elements, and accessible to the tribes shall be constructed within the boundary of DR-001. The specific location, size, and construction methodology of the vault will be developed in direct consultation with the consulting tribes. **TCR/mm-1.2: Project Design Considerations.** The applicant shall incorporate, to the extent feasible, themes, infrastructure, and placenames associated with local Chumash tribes into the overall project design throughout all phases of future development. These design considerations shall include, but not be limited to the following aspects: 1. Designated areas for local Chumash tribes to use for various purposes, such as ceremonial gatherings, education, and events; 2. Planting of native vegetation, specifically species varieties that have significance to the local Chumash tribes; 3. Incorporation of informative and interpretive signage; 4. Incorporation of tribal names, placenames, and phrases for appropriate project design features; and 5. Development of designated trails outside of the boundaries of known resources to limit unauthorized use and reduce potential for looting.	Residual impacts would be less than significant with mitigation (Class II)
Off-Site Improvements	**TCR Impact 2:** Off-site improvements could result in adverse effects to known and unknown CRHR-Eligible Resources or resources considered by the County to be significant pursuant to PRC Section 5024.1.	Implement Mitigation Measures **CR/mm-2.3, CR/mm-2.4, and CR/mm-3.1**.	Residual impacts would be less than significant with mitigation (Class II)
Cumulative	**TCR Impact 3:** Project implementation could result in the cumulative disturbance and destruction of tribal cultural resources, including known and unknown CRHR-Eligible Resources and resources considered by the County to be significant tribal cultural resources pursuant to PRC Section 5024.1.	Implement Mitigation Measures **CR/mm-2.1. through CR/mm-2.4, CR/mm-3.1, TCR/mm-1.1, and TCR/mm-1.2**.	Residual impacts would be less than significant with mitigation (Class II)

Project Component	Impacts	Mitigation Measures	Residual Impacts
Utilities and Service Systems			
Specific Plan Area	**USS Impact 1:** The project would require the construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, and telecommunications facilities.	Implement Mitigation Measures **AQ/mm-3.1, AQ/mm-3.2, AQ/mm-7.1, BIO/mm-1.1 through BIO/mm-1.6, BIO/mm-2.1 through BIO/mm-2.3, BIO/mm-3.1, BIO/mm-4.1 and BIO/mm-4.2, BIO/mm-5.1, BIO/mm-6.1, BIO/mm-7.1, BIO/mm-8.1, BIO/mm-9.1, BIO/mm-14.1, BIO/mm-15.1, BIO/mm-18.1 through BIO/mm-18.4, CR/mm-1.1 through CR/mm-1.4, GEO/mm-8.1 through GEO/mm-8.3, and N/mm-1.1**.	Residual impacts would be less than significant with mitigation (Class II)
Off-Site Improvements	**USS Impact 2:** The project would require the construction of new and expanded off-site water and wastewater system improvements.	Implement Mitigation Measures **AQ/mm-3.1, AQ/mm-3.2, AQ/mm-7.1, BIO/mm-1.1 through BIO/mm-1.6, BIO/mm-2.1 through BIO/mm-2.3, BIO/mm-3.1, BIO/mm-4.1 and BIO/mm-4.2, BIO/mm-5.1, BIO/mm-6.1, BIO/mm-7.1, BIO/mm-8.1, BIO/mm-11.1, BIO/mm-13.1, BIO/mm-16.1, BIO/mm-17.1 through BIO/mm-17.3, BIO/mm-19.1, CR/mm-1.1 through CR/mm-1.4, HAZ/mm-7.1, GEO/mm-8.1 through GEO/mm-8.3, and N/mm-1.1**.	Residual impacts would be less than significant with mitigation (Class II)
Specific Plan Area	**USS Impact 3:** The project may not have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.	**USS/mm-3.1:** Prior to issuance of development permits for any project phase, the project developer shall be required to provide proof of water supply sufficient to meet the estimated water demand for proposed development based on the demand projections included in the Dana Reserve WSA. The proof of water supply shall include an affirmative concurrence from the Nipomo Community Services District that they have adequate water supply to serve the development and shall be subject to review and approval by the County prior to issuance of any development permits.	Residual impacts would be less than significant with mitigation (Class II)
Off-Site Improvements	**USS Impact 4:** Off-site improvements would not result in an increase in demand on water supply.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)
Specific Plan Area	**USS Impact 5:** The NCSD could have adequate capacity to treat wastewater generated by the project.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)
Off-Site Improvements	**USS Impact 6:** Off-site improvements would not result in an increase in demand on wastewater services.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)
Specific Plan Area	**USS Impact 7:** The project could generate solid waste in excess of the capacity of local infrastructure or otherwise impair state or local solid waste reduction goals.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)
Off-Site Improvements	**USS Impact 8:** Off-site improvements could generate solid waste in excess of the capacity of local infrastructure or otherwise impair state or local solid waste reduction goals.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)

Project Component	Impacts	Mitigation Measures	Residual Impacts
Specific Plan Area	**USS Impact 9:** The project would comply with federal, state, and local solid waste reduction goals.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)
Off-Site Improvements	**USS Impact 10:** Off-site improvements would comply with federal, state, and local solid waste reduction goals.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)
Cumulative	**USS Impact 11:** The project could result in a cumulatively considerable impact to utilities and service systems.	Implement Mitigation Measure **USS/mm-3.1**.	Residual impacts would be less than significant with mitigation (Class II)
Wildfire			
Specific Plan Area	**WF Impact 1:** The project could impair an adopted emergency response plan or emergency evacuation plan.	**WF/mm-1.1:** Prior to occupancy of any Dana Reserve Specific Plan neighborhoods, the master Dana Reserve Homeowner's Association shall coordinate with individual Dana Reserve Specific Plan neighborhood Homeowner's Associations and County of San Luis Obispo Fire Department to identify temporary refuge areas throughout the community. Temporary refuge areas shall be documented and available for residents and guests within the Specific Plan Area. Refuge areas may include the following: 1. Parking lots in commercial and multi-family residence areas 2. Neighborhoods parks 3. Public parks 4. Neighborhood pocket parks The master Homeowner's Association shall also coordinate with individual Dana Reserve Specific Plan neighborhood Homeowner's Associations and County of San Luis Obispo Fire Department to develop a method of public outreach to provide information regarding emergency planning and alerting within the Specific Plan Area. Information to be provided to the public shall include, but not be limited to, the following: 1. Location of established refuge areas 2. Emergency entry and exit points within the community 3. Nearest emergency entry and exit points to each specific neighborhood 4. Family emergency planning 5. Types of emergency alerting and methods to receive emergency notifications 6. Emergency supply kit necessities 7. Care options for pets and other animals in an emergency	Residual impacts would be less than significant with mitigation (Class II)

Project Component	Impacts	Mitigation Measures	Residual Impacts
		Public outreach shall be conducted annually and include any updated emergency planning information, as necessary. Compliance shall be documented with the County of San Luis Obispo.	
Off-Site Improvements	**WF Impact 2:** Off-site improvements could impair an adopted emergency response plan or emergency evacuation plan.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)
Specific Plan Area	**WF Impact 3:** The project could exacerbate wildfire risks due to development within a high fire hazard severity zone.	**WF/mm-3.1:** Prior to project occupancy, the master Homeowner's Association shall adopt Covenants, Conditions, and Restrictions that include requirements for the maintenance and protection of the open space areas that ensure that these spaces are maintained in perpetuity. Prior to adoption by the master Homeowner's Association, Covenants, Conditions, and Restrictions shall be created in coordination with the County to ensure feasibility of open space management practices. The Covenants, Conditions, and Restrictions shall be enforced by the master Homeowner's Association throughout the lifetime of the project. Language regarding protection and management of open space areas as it pertains to wildfire may include, but shall not be limited to: 1. Smoking, use of cooking equipment, or any other ignition source is prohibited in the open space areas. 2. Safety precautions are required when using equipment capable of creating a spark; this includes spark arrestors. 3. All fireworks or other devices that could cause an ignition of a fire are prohibited throughout the Dana Reserve. 4. Overnight camping is prohibited. 5. Motorized vehicles are not permitted in the open space areas. (except emergency vehicles, vehicles permitted by the Homeowner's Association to conduct official business, and single-rider motorized vehicles adapted for recreational use by people with disabilities). 6. Discharging or carrying firearms, crossbows, fireworks, or projectile weapons of any kind is not permitted (except law enforcement officials) in the Dana Reserve. 7. The Homeowner's Association will maintain fire prevention signage in fire-prone areas near or on trails. 8. The Homeowner's Association will conduct vegetation management in the open spaces, in the retention basins, on trails, and near U.S. Route101 that prevent or reduce the ability for a wildfire to spread to other properties in proximity. Methods used will provide for the protection of the open space environment. 9. Fencing or barriers adjoining the open space areas, whether owned privately or by the Homeowner's Association, will be constructed of a fire-resistive material so that it will not convey or contribute to the spread of fire from or to the open space areas (exception may include an open-type	Residual impacts would be less than significant with mitigation (Class II)

Project Component	Impacts	Mitigation Measures	Residual Impacts
		fence, such as a split-rail fence). Combustible fence material will not be used within 5 feet of structures. 10. Vegetation management will be consistent with Dana Reserve's County of San Luis Obispo-approved oak woodland habitat management plan. 11. The Homeowner's Association is authorized to enter into contracts and agreements for vegetation management in and near the open space areas that includes hand, mechanical, animal, prescribe fire, herbicide, and other methods consistent with accepted vegetation management practices. 12. The Homeowner's Association is authorized to increase assessment and fines necessary to protect and maintain the open space areas. This may include funds for the hiring of staff and contracts. 13. The Homeowner's Association is authorized to enter into agreements with agencies, land conservancies, and other organizations who also have a mutual concern for the protection of the open space areas.	
Off-Site Improvements	**WF Impact 4:** The project could exacerbate wildfire risks due to development within a high fire hazard severity zone.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)
Specific Plan Area	**WF Impact 5:** The project would require installation of internal roads, public utility easements, and utility infrastructure that may exacerbate fire risk.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)
Off-Site Improvements	WF Impact 6: Off-site improvements could exacerbate fire risk.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)
Specific Plan Area	**WF Impact 7:** The project could expose people or structures to risk associated with downslope or downstream flooding or landslides.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)
Off-Site Improvements	**WF Impact 8:** The project could expose people or structures to risk associated with downslope or downstream flooding or landslides.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)
Cumulative	**WF Impact 9:** The project would not result in a cumulatively considerable impact related to wildfire.	Mitigation is not necessary.	Residual impacts would be less than significant (Class III)

Project Component	Impacts	Mitigation Measures	Residual Impacts
Growth-Inducing Impacts			
Specific Plan Area Cumulative	**GI Impact 1:** The project would result in substantial growth inducement associated with the proposed project's population as well as the potential to induce additional spatial, economic, or population growth in a geographic area.	No feasible mitigation has been identified.	Residual impacts would be significant and unavoidable (Class I)

6. AREAS OF CONTROVERSY

Section 15123(b)(2) of the State CEQA Guidelines requires identification of the areas of controversy known to the Lead Agency, including issues raised by agencies and the public. In compliance with State CEQA Guidelines Section 15082, as amended, an Initial Study and Notice of Preparation (IS/NOP) was circulated on June 24, 2021, to various agencies, organizations, and interested persons throughout the region. The proposed project was described, the scope of the environmental review was identified, and agencies and the public were invited to review and comment on the IS/NOP. The close of the IS/NOP review period was July 25, 2021. Following the close of the 30-day comment period on the IS/NOP, a review of comment letters was conducted to identify any key issues that may require additional technical studies or background research. Pursuant to State CEQA Guidelines Section 15082 (c)(1), for projects of statewide, regional, or areawide significance, the Lead Agency is required to conduct at least one scoping meeting. The scoping meeting is for jurisdictional agencies and interested persons or groups to provide comments regarding, but not limited to, the range of actions, alternatives, mitigation measures, and environmental effects to be analyzed. The County hosted a scoping meeting on July 19, 2021, via a Zoom webinar.

Areas of controversy raised by public agencies, public organizations, and individual members of the public primarily included concerns regarding neighborhood compatibility, including the density of the proposed project, light pollution, and safety; the sustainability of the potable water supply in the project region; an increase in traffic congestion and associated traffic-related noise; loss of oak woodlands and sensitive biological resources; and development within an area prone to wildfire risk. These concerns are addressed in the evaluation and identification of potential mitigation measures for each environmental issue area included in Chapter 4, *Environmental Impact Analysis*, respectively.

7. PROJECT ALTERNATIVES

Section 15123(b)(3) of the State CEQA Guidelines requires identification of the choice among project alternatives. Alternatives to the proposed project are discussed in detail in Chapter 5, *Alternatives Analysis*, of this EIR in accordance with Section 15126.6 of the State CEQA Guidelines. Alternatives to be considered under CEQA are those that would avoid or substantially lessen one or more of the significant environmental effects identified during evaluation of the proposed project. As identified in Table ES-2, the project would result in significant impacts related to air quality, biological resources, greenhouse (GHG) gas emissions, land use and planning, population and housing, and transportation. In order to maximize the range of alternatives considered and provide flexibility during project approval, the EIR evaluated a total of eight variations of the proposed project aimed at reducing the project's significant and unavoidable impacts. In addition, the EIR also evaluated the No Project Alternative as required by State CEQA Guidelines Section 15126.6(e), to allow decision makers to compare the impacts of approving the project with the impacts of not approving the project.

State CEQA Guidelines Section 15126.6(c) requires that an EIR disclose potential alternatives that were considered and eliminated along with a brief explanation of the reason for elimination. Factors used to eliminate alternatives from detailed consideration include: (1) failure to meet most of the basic project objectives; (2) infeasibility; and/or (3) inability to avoid significant environmental impacts. The following alternatives were considered but ultimately eliminated based on the above stated criteria:

- **Burton Mesa Chaparral Avoidance Alternative.** Under this potential alternative, proposed development would be limited to the eastern portion of the project site by increasing the density of proposed single-family residential dwellings, multi-family residential dwellings, and proposed commercial development in the eastern portion of the site and reducing the area of proposed buildout, particularly in sensitive areas of biological resources in the western portion of the

Specific Plan Area, including areas supporting Burton Mesa chaparral. While the Burton Mesa Chaparral Avoidance Alternative would substantially avoid and reduce impacts to biological resources and reduce air pollutant and GHG emissions, reduce vehicle miles traveled (VMT), reduce unplanned population growth, and improve project consistency with applicable plans and policies, this alternative would not reduce significant impacts related to aesthetic resources and would potentially increase impacts associated with compatibility with the surrounding areas. Further, this alternative would not meet all of the basic project objectives, such as providing a diversity of housing types, including affordable homes, and connecting on-site residential neighborhoods to the community through development of pedestrian, bicycle, and equestrian trails via Collector B and an on-site trail system in the majority of the Specific Plan Area. The Burton Mesa Chaparral Avoidance Alternative does not meet all of the basic project objectives and is likely infeasible from a cost perspective. It also has the potential to generate more severe and/or new potentially significant impacts; therefore, this alternative was eliminated from further review, consistent with State CEQA Guidelines Section 15126.6(c).

- **Residential Rural Development Alternative.** This alternative would result in a future buildout scenario that is consistent with the existing Residential Rural (RR) land use designation for the project site. While this alternative would result in residential development in a manner that would be more consistent with the scale of adjacent residential land uses and would reduce air pollutant emissions, GHG emissions, VMT, and population growth, the Residential Rural Development Alternative would not meet the basic project objectives related to providing a diversity of housing types, including affordable homes. This alternative also has the potential to increase impacts related to utilities and service systems. Therefore, the Residential Rural Development Alternative was eliminated from further discussion in accordance with State CEQA Guidelines Section 15126.6(c).
- **Exclusively Commercial/Retail Development Alternative.** Under this alternative, the 288-acre project site would not be developed with residential uses and would instead be developed with flex commercial and village commercial uses over 238.2 acres of the project site. While this alternative would reduce air pollutant emissions, GHG emissions, VMT, and population growth, the Exclusively Retail Development Alternative would not meet the basic project objectives and would be inconsistent with the General Plan. This alternative would not meet project objectives and County objectives (as defined in the County's MOU with the Applicant) related to providing a diversity of housing types, including affordable homes, and providing public parks. This alternative would continue to result in the loss of oak woodland, Burton Mesa chaparral, and other natural habitats and would alter the existing visual character of the project site. This alternative may also be infeasible due to the project area's inability to support this significantly increased extent of commercial/retail uses. Since the Exclusively Commercial/Retail Development Alternative would not meet the basic project objectives, if potentially infeasible, and would not reduce all of the project's significant impacts, this alternative was eliminated from further consideration, consistent with State CEQA Guidelines Section 15126.6(c).
- **Alternative Location Alternative.** Under this alternative, the project would not be developed on the proposed 288-acre Dana Reserve and would be developed at another location within the county. An alternative location would need to be large enough to accommodate approximately 173 acres of residential land uses, including 831 residential single-family units, 458 residential multi-family units, and up to 152 ADUs; 22.3 acres of commercial land uses; 49.8 acres of open space; 21.9 acres of roadways; and 11 acres of public recreational facilities. The applicant does not own alternative sites that could accommodate the proposed development; therefore, it is uncertain whether an alternative site would be feasible, successfully reduce the project's significant impacts, and meet the basic project objectives. Therefore, the Alternative Location

Alternative was eliminated from further discussion in accordance with State CEQA Guidelines Section 15126.6(c).

Criteria used to develop preliminary project alternatives to be carried forward for further evaluation included: (1) whether the alternative would avoid or substantially lessen significant impacts to air quality, biological resources, GHG emissions, land use and planning, population and housing, and transportation; (2) whether the alternative would generally meet most of the basic project objectives and underlying fundamental purpose; and (3) whether implementation of the alternative would be feasible. The following alternatives were carried forward for detailed evaluation:

- **No Project Alternative.** Under this alternative, implementation of the DRSP would not occur and future buildout of the project site, including off-site improvement areas, would not occur. This alternative assumes no development would occur on the site to provide a clear comparison of the project to existing (undeveloped) baseline conditions; development as envisioned in the current General Plan for Cañada Ranch is evaluated in La Cañada Ranch Alternative, below. As no physical changes to the environment would occur, potentially significant impacts would be substantially reduced in comparison to the proposed project. However, the No Project Alternative would not meet any of the project objectives.
- **Alternative 1: Applicant-Preferred Alternative.** This alternative would change the conceptual master plan slightly by reconfiguring the conceptual master plan to relocate a multi-family neighborhood (Neighborhood [NBD] 10) from the northeastern portion of the project site to the central portion of the site adjacent to the eastern side of the proposed public neighborhood park. As a result, the proposed public park would be reduced to 6 acres in size. This alternative would also relocate the future construction of Collector A through APN 091-301-029 to connect North Frontage Road to Willow Road; consistent with the proposed project, Collector B would connect Hetrick Avenue to Willow Road through APN 091-301-031. Under Alternative 1, buildout of the project site would be consistent with the scale and proposed land use types included under the proposed project. As a result, impacts under this alternative would be generally consistent with impacts associated with the proposed project. However, this alternative would change the alignment of Collector A and would move a proposed neighborhood from the northeastern portion of the site, which would substantially reduce the number of impacted oak trees. Alternative 1 would meet all of the project objectives.
- **Alternative 2: La Cañada Ranch Specific Plan Alternative.** Under this alternative, buildout of the project site would be consistent with the buildout scenario for the site as envisioned in the County's General Plan. This alternative would result in an increase in light industrial and commercial development and a decrease in residential development and would also substantially increase the amount of land designated for open space and eliminate recreational land uses, consistent with the types of uses prioritized in LUO Section 22.98.072 (listed above). Under this alternative, impacts related to air quality, biological resources, GHG emissions, land use and planning, population and housing, and transportation would be reduced. However, the La Cañada Ranch Alternative would increase impacts related to recreation. Although this alternative would facilitate the future development of residential land uses, due to the substantial reduction in the number of proposed units, the number of affordable units would be significantly decreased in order to provide funding for site development and other improvements. As a result, the La Cañada Ranch Alternative would not meet most of the basic project objectives, including providing a mix of residential development, including affordable homes, and providing public recreational facilities at the project site.
- **Alternative 3: Residential Rural Cluster Subdivision Alternative.** Under this alternative, no commercial development would occur, and the density of residential development would be limited, resulting in a smaller scale of buildout as compared to the proposed project. Based on the

reduction of proposed residential units, this alternative would reduce population growth in comparison to the proposed project. As a result, impacts related to biological resources, GHG emissions, land use and planning, population and housing, and public services would be reduced. However, the Residential Rural Cluster Subdivision Alternative would result in similar impacts related to air quality and transportation. In addition, this alternative may preclude annexation into the NCSD due to infrastructure costs to serve the reduced number of new connections and would, therefore, potentially increase impacts related to utilities and service systems. Due to the substantial reduction in the number of proposed residential units, the Rural Residential Cluster Subdivision Alternative would not meet the basic project objective of providing a diversity of housing types, including affordable homes. This alternative would also be inconsistent with the commercial and light industrial land uses planned for the site as identified in County's General Plan.

- **Alternative 4: Development on Non-Native Grassland Alternative.** This alternative would increase the amount of land dedicated to open space by reducing the area of proposed residential, commercial, and recreational development, and by avoiding to a greater extent the amount of impacted oak woodland and Burton Mesa chaparral habitat. This alternative would marginally reduce population growth in comparison to the proposed project but would require higher density development within the reduced project footprint to maintain the same general level of buildout of the Specific Plan Area. Buildout of this alternative would still constitute a substantial increase in growth within the community of Nipomo and impacts related to air quality, GHG emissions, land use and planning, population and housing, and transportation would be generally consistent with the proposed project. By avoiding the majority of onsite oak woodlands and Burton Mesa chaparral, this alternative would substantially reduce impacts to biological resources; however, the increased density may increase impacts related to compatibility with surrounding areas. The Development on Non-Native Grassland Alternative is considered feasible; however, it may conflict with the basic project objective of providing a mix of housing types and affordable housing options.
- **Alternative 5: Gradual Transition along the Fringe Alternative.** This alternative would include the same type and configuration of land uses as Alternative 1: the Applicant-Preferred Alternative, but it would reduce the density of residential development along the property boundaries to provide a more gradual transition between surrounding rural residential development and the denser residential development within the Specific Plan Area. The maximum number of units within neighborhoods located adjacent to the northern, southern, or western boundary of the Specific Plan would be reduced by 20% (approximately 154 units of a 12% total reduction) to accommodate the lower density build-out of the Specific Plan Area's perimeter. This alternative would marginally reduce population growth in comparison to the proposed project; however, buildout of this alternative would still constitute a substantial increase in growth within the community of Nipomo and impacts related to air quality, biological resources, greenhouse gas emissions, land use and planning, population and housing, and transportation would be generally consistent with the proposed project. This alternative is considered feasible; however, it will likely reduce the affordability of housing within the Specific Plan Area and, therefore, may conflict with the basic project objective of providing a mix of affordable housing options. In addition, this alternative fails to substantially reduce or avoid any of the significant impacts identified for the proposed project.

The State CEQA Guidelines require an analysis of alternatives to identify an environmentally superior alternative among the alternatives evaluated in the EIR. The environmentally superior alternative is the alternative that would minimize adverse impacts to the environment. Based on the evaluation of alternatives, the No Project Alternative would be the environmentally superior alternative because it would minimize the project's adverse impacts to the environment. However, State CEQA Guidelines

Section 15126.6(e)(2) states that if the No Project Alternative is also the environmentally superior alternative, the EIR should then identify an environmentally superior alternative among the other alternatives. Based on the detailed evaluation of project alternatives included in EIR Chapter 5, *Alternatives Analysis*, Alternative 3: the Residential Rural Cluster Subdivision Alternative would be considered the environmentally superior alternative. Since residential development would be central to this alternative, this alternative would help the County reach its housing development allocation goals per the County RHNA required by state law. However, based on the clustered development and other site constraints, this alternative may not meet project goals for the provision of affordable market rate housing units. Therefore, Alternative 3 would reduce the project's significant impacts; however, it would not meet all of the project's objectives. Because it would most successfully reduce the number and extent of significant environmental impacts, and would meet more of the project's primary objectives than other alternatives, Alternative 3 is the Environmentally Superior Alternative.