



ATTACHMENT 1

COUNTY OF SAN LUIS OBISPO
DEPARTMENT OF PLANNING & BUILDING

PLN-2039
04/2019

Preliminary Initial Study – Environmental Checklist

Somera (The Cottages)

Development Plan/ Coastal Development Permit ED19-008 (DRC2018-00033)

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

Table with 3 columns of environmental factors and checkboxes. Checked items include: Aesthetics, Biological Resources, Cultural Resources, Geology & Soils, Hydrology & Water Quality, and Transportation.

DETERMINATION: (To be completed by the Lead Agency)

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

- Five bullet points with checkboxes describing potential environmental impacts and required actions like 'NEGATIVE DECLARATION' or 'ENVIRONMENTAL IMPACT REPORT'.

Signature lines for Prepared by, Reviewed by, and Date, with a signature for Steve McMasters, Principal Environmental Specialist.

## Initial Study – Environmental Checklist

### Project Environmental Analysis

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

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

### A. Project

**DESCRIPTION:** A request by SCM Avila Beach Partners, LLC for a Development Plan/ Coastal Development Permit for the construction of a 50-room cottage style hotel, various sized temporary events not exceeding 200 guests and modification of side and rear setback standards. The applicant is also requesting a variance to grade over 30% slopes and an amendment to the San Luis Bay Estates Master Development Plan to increase the potential development area from previously approved 4 acres to 7 acres of development area. The project will result in the disturbance of approximately 7 acres on the 22.25-acre parcel with an approximate of 20,300 cubic yards of cut and 18,000 cubic yards of fill. The project site is in the Recreation land use category and is located approximately 620 feet northwest of the Avila Beach Drive and Ana Bay Drive intersection in the community of Avila Beach. The site is in the San Luis Bay Coastal planning area. *Expanded project information can be found in Detailed Project Description for Environmental Analysis in Exhibit B.*

**ASSESSOR PARCEL NUMBER(S):** 076-174-009

**Latitude:** 35 degrees 10' 47" N **Longitude:** 120 degrees 44' 35" W **SUPERVISORIAL DISTRICT #** 3

### B. Existing Setting

**Plan Area:** San Luis Bay (Coastal) **Sub:** None **Comm:** Avila

**Land Use Category:** Recreation

**Combining Designation:** Coastal Zone, Archeologically Sensitive Area, Geologic Hazard Area, Sensitive Resource Area

**Parcel Size:** 22.6 acres

**Topography:** Moderate to steeply sloping

**Vegetation:** Grass, Coastal Scrubs, Ruderal Vegetation

**Existing Uses:** Undeveloped

## Initial Study – Environmental Checklist

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### Surrounding Land Use Categories and Uses:

**North:** Agriculture, grazing land, residential

**East:** Recreation, commercial, golf course

**South:** Recreation, Cal Poly Pier, beach

**West:** Agriculture, commercial

### C. Environmental Analysis

The Initial Study Checklist provides general information about the environmental impacts of the proposed project and shall be used as the basis for a full environmental impact review in accordance to CEQA requirements and policy consistency with all applicable State regulations, County General Plan, Local Coastal Program and Policies (LCP), Coastal Framework for Planning, Area Plans, Official Maps, Coastal Zone Land Use Ordinance (CZLUO), Building Construction Code and any other programs, as applicable.

## Initial Study – Environmental Checklist

### I. AESTHETICS

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

#### Setting

The project site is currently undeveloped and is an undulating coastal promontory as seen from Avila Beach Road, Port San Luis, Hartford Pier, surrounding beach and recreational water use areas within the Port San Luis Beach harbor. The property generally slopes down to the southwest and southeast corners, and there is a natural knoll in the center of the property. The southern boundary of the property terminates at a bluff top. Vegetation is sparse, consisting primarily of grasslands with sparse shrubs and occasional trees, including a few oak trees. Currently, the San Luis Bay Inn is the only structure adjacent to the site. The nearby historic Marre House (1932) is located approximately 1,150 feet north of the parcel and can be seen as one drives westwards along Avila Beach Road.

The proposed development includes 50 single level cottages, a double story main hotel reception lodge, above and below ground parking spaces, a parking structure, a waste facility, an entry kiosk and signage boards (both on site and off site). The 35,000 square foot two-story lodge is located closest to the southeastern boundary and includes typical hotel amenities such as a reception lobby, restaurant, pool and spa, and conference / banquet space, and retail. The cottages are clustered on the western portion of the site and will have six design configurations with a porch and/or deck averaging 550 to 850 square feet each (not including porch/deck). Two arrival signage will be on site, and two more directional signage will be located off site at Ana Bay Road / Marre Road (access road) and Ana Bay Road/Avila Beach Drive intersection.

## Initial Study – Environmental Checklist

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The architecture draws from the tradition of vernacular rural California barns, with weathered wood siding and shake roofs. All structures are within the 35' height allowance per CZLUO. At this stage, the conceptual landscape plan showed a blend of native California, drought tolerant plants and fruitless olive trees to provide a sense of agricultural landscape history and screening. The project includes the usage of agricultural vernacular style fencing and guard rails.

### *Discussion*

The applicant submitted conceptual illustrations and identified five critical viewpoints to the site as seen from the public road. The proposed lodge is a tall two-story structure that may silhouette the existing ridgeline and glimpses of the hotel can be seen from portions of Avila Beach Drive and State Beach due to its proximity to the southern bluff. The lodge and some cottages are located close to western and northern boundary and will require setback adjustments per CZLUO. Some portion of the hotel construction and improvements to the existing driveway and off-site utilities are over 30% slopes and will require retaining walls, some up to 8' high that can be seen from Port San Luis harbor and beach. In addition, the proposed hotel is a new development on a previously undeveloped prominent bluff surrounded by agricultural pastures will result in additional nighttime glare.

The applicant also proposed two utility layout plans; *Preferred* and *Original Utility* routes. Most of the utilities are subterranean with the exception of power/communication lines and storm water drainage. Both plans include extending the power and communication lines from an existing power pole directly south of the bluff face at Cal Poly Pier to the proposed development up on the hill. There will be a new power pole introduced at the top of the bluff before the lines transition underground along the access road. Stormwater discharge is connected to an existing storm drain at the bottom of Wild Cherry Creek via a proposed above ground pipe that may be seen from Avila Beach and Port San Luis. As proposed, the proposed project may result in adverse visual impacts.

### *Conclusion/ Further Analysis*

The applicant's conceptual illustrations will need to be independently peer-reviewed, and supplemental visual study may need to be prepared. In addition, the submitted conceptual landscape plan can be augmented to include screening vegetation as needed for visual mitigations in the EIR analysis. The site is located within the coastal viewshed corridor identified in the County's Conservation and Open Space Element. The EIR will provide a discussion of the applicable regulations, including those in the discussion of the potential impacts related to coastal visual resources and mitigation measures for project activities and alternatives. Consistency with County's General Plan, LCP policies and CZLUO standards for coastal visual resources should be evaluated as part of this discussion.

### *Sources*

See Exhibit A.

## Initial Study – Environmental Checklist

### II. AGRICULTURE AND FORESTRY RESOURCES

	<b>Potentially Significant Impact</b>	<b>Less Than Significant with Mitigation Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
<p><i>In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:</i></p>				
(a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

#### Setting

The site is not classified as State Prime Farmland and does not have historic agricultural activities on site. It is not in a Williamson Act contract. The soil type(s) and characteristics on the subject property include:

Lodo clay loam (30 - 50 % slope). This steeply sloping, shallow fine loamy soil is considered very poorly drained. The soil has moderate erodibility and moderate shrink-swell characteristics, as well

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as having potential septic system constraints due to: steep slopes, shallow depth to bedrock. The soil is considered Class VI without irrigation and Class is not rated when irrigated.

Los Osos loam (15 - 30 % slope). This moderately sloping loamy claypan soil is considered not well drained. The soil has moderate erodibility and moderate shrink-swell characteristics, as well as having potential septic system constraints due to: steep slopes, shallow depth to bedrock, slow percolation. The soil is considered Class IV without irrigation and Class is not rated when irrigated.

Los Osos loam (30 - 50 % slope). This steeply sloping loamy claypan soil is considered not well drained. The soil has moderate erodibility and moderate shrink-swell characteristics, as well as having potential septic system constraints due to: steep slopes, shallow depth to bedrock, slow percolation. The soil is considered Class VI without irrigation and Class is not rated when irrigated.

Xerorthents, Escarpment. This moderately steep to very steeply sloping soil has unrated drainage characteristics. The soil has unrated erodibility and unrated shrink-swell characteristics, as well as having unrated septic system constraints. The soil is considered Class VII without irrigation and the Class is not rated when irrigated.

### *Discussion / Conclusion*

The project site is surrounded on the north and west with agricultural land, which is used for low to moderate levels of cattle grazing. The proposed project will not convert prime farmland nor conflict with existing agricultural operations.

The project incorporates several features to reduce impacts to the adjacent grazing activities and future hotel guests such as utilizing fruitless olive trees to control volunteer spread, fencing and appropriate signage to disclose the County's Right-to-Farm and no trespassing rules, and also a 100' fuel management buffer on the adjacent property. These measures have been coordinated with the County's Agricultural Commissioner's office and no significant impacts to agricultural resources are anticipated.

### *Sources*

See Exhibit A.

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### III. AIR QUALITY

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

#### Setting

The project proposes to disturb soils that have been given a wind erodibility rating of 6, which is considered moderately low. The Air Pollution Control District (APCD) has developed and updated their [CEQA Air Quality Handbook \(2012\)](#) to evaluate project specific impacts and help determine if air quality mitigation measures are needed, or if potentially significant impacts could result. To evaluate long-term emissions, cumulative effects, and establish countywide programs to reach acceptable air quality levels, APCD adopted the Clean Air Plan (CAP) in 2001. The CAP outlines the APCD's strategies to reduce ozone precursor emissions from variety of stationary and mobile sources.

#### Discussion

The applicant prepared an Air Quality Impact Technical Report to analyze the project's air quality impacts. The analysis covered impacts from both construction and operational emissions and also, impacts of naturally occurring asbestos. Default construction emissions were calculated with default assumptions using CalEEMod over a period of 13 months. Emissions associated with the operations of the project are primarily result from vehicle trips associated with the project and area sources. The analysis indicated the short term (construction) and long term (operational) emissions are not predicted to exceed established significance thresholds for criteria pollutants set by APCD. The report was reviewed by APCD, which specified several BMP emission reduction measures to be incorporated into the project.



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### *Conclusion/ Further Analysis*

The applicant's Air Quality Impact Technical Report will need to be independently peer-reviewed and augmented (as needed) in the EIR analysis. The discussion should evaluate the adequacy of the analyses, recommendations and mitigations measures for both construction and operation phases of the project. Air quality policies in the LCP and the Conservation and Open Space Element should be considered in the overall evaluation and consistency findings.

### *Sources*

See Exhibit A.

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### IV. BIOLOGICAL RESOURCES

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

#### Setting

A Biological Resource Assessment (BRA) was completed by LSA Associates Inc. in March 2018 and updated in September 2018 to respond to an initial peer review. Approximately 44.5 acres were surveyed in the BRA,

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which included the 22.5 acre subject parcel, 100' corridor along the access road (Marre Road) and dirt road through Wild Cherry Canyon (1.65 acres), three potential pedestrian footpath alternatives, preliminary storm drainage alignment (up to 0.33 acre) and fuel modification buffer zones (3.76 acres). These survey efforts included focused botanical surveys, vegetation community mapping, a wildlife survey, and a habitat assessment for California red-legged frog (CRLF; *Rana draytonii*), a federally listed threatened species and California species of special concern. The overall survey area is mostly undeveloped, with the exception of the San Luis Bay Inn development, Ana Bay Road, Point San Luis Lighthouse Tour parking area at Wild Cherry Canyon Road, and an existing network of dirt access roads. Much of the overall survey area is disturbed from ongoing grazing, existing roadways and nearby developments which is surrounded by commercial, residential, and recreational uses.

### *Discussion*

The BRA included tree-inventory and jurisdictional delineation assessments. Four distinct natural vegetation communities and three anthropogenic areas were documented within the overall survey area. Natural vegetation communities identified include: Annual Brome Grassland, California Sagebrush Scrub, Coast Live Oak Woodland, and Coast Live Oak Riparian Woodland. Potential state-jurisdictional features occur along the southern portion of the survey area. Direct observation found no special status natural communities and special status animal species within the survey area. One special-status plant, Chaparral Ragwort (Senico Aphanitic California Rare Plant Rank 2B.2) and a small population of purple needlegrass community were observed along the southern portion of the original survey area. Chaparral Ragwort occurs more commonly outside of California per the California Native Plant Society ranking summary and is deemed not a coastal habitat dependent species.

The BRA included mitigation recommendations to reduce the proposed projects' potential impact on environmental resources on the site. Tree and vegetation replacement, pre-construction surveys for special-status plants or animals, limited construction period outside of nesting bird seasons, and best management practices preventing sedimentation and construction run-off into waterways are measures included in the recommendations.

### *Conclusion/ Further Analysis*

The BRA was conducted in March 2018 and peer reviewed by the County. The applicant updated their BRA in September 2018 to address concerns about offsite improvements (utilities) that were not covered in the original survey area and the potential for ESHA. Since then, the project has changed with increased off-site improvements to accommodate the additional *Preferred Utility* layout. The final amount and area for offsite improvements associated with the *Preferred Utility* layout have not been confirmed and will require supplemental BRA when a firmer and feasible scope is defined.

The applicant's BRA will need to be independently peer-reviewed and augmented (as needed) in the EIR analysis. Supplemental assessments will need to be made to cover both project scenarios with *Preferred* and *Original Utility* layouts, once viable final routes are confirmed. The EIR should review the adequacy of analyses for both scenarios, the recommendations set forth in the BRA and the feasibility of both utility options and their impacts (short term and long term) to the surrounding environment. LCP coastal resource protection policies and the Conservation and Open Space Element should be considered in the overall evaluation and consistency findings.

### *Sources*

See Exhibit A.

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### V. CULTURAL RESOURCES

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

#### Setting

**Historical Resources.** The applicant has prepared a Historic Resources Report (Post/Hazeltine, 2017) that concluded that the site contains remnants of a historical horse-drawn railroad Right-of-Way and retains sufficient integrity to convey its association with the historic Marre Ranch. The project qualifies for the California Register of Historic Resources for Criteria 1,2 and 3 and also, the National Register of Historic Places under Criterion B and C.

**Archeological Resources.** The project is in an area historically occupied by Native American tribes on the shores of San Luis Obispo Bay. Several studies had been undertaken at this site and vicinity with the earliest in 1948, establishing the significance of several identified tribal villages on the project site and surrounding areas. The archeological sites were found to be large, complex prehistoric villages with human remains which gave insights to social establishment of the Chumash tribes living in the coast. The Northern Chumash tribes trace their ancestry to an ethnohistoric village, *Sejato* in Avila Beach and many believe that the village is located in the vicinity of the project site.

The applicant has prepared a Phase 1 Archeological Survey Report with limited Extended Phase 1 subsurface testing for the project area (Applied Earthworks, 2015). The Phase 1 includes results of archival and background research, official resource searches conducted at the Central Coast Information Center (CCIC) of the California Historical Resources Information System at the University of California, Santa Barbara, pedestrian survey, and also, limited number of shovel test pits on the southwestern portion of the project area. The applicant prepared additional Phase 2 Archeological Evaluation at the northern portion of the project area (Applied Earthworks, 2017). As designed, the proposed development will impact significant archeological sites as mapped in the reports.

In early 2018, the County had initiated local tribal consultations for the project under AB52. The applicant further prepared an additional Archeological Pedestrian Survey of Marre Road (Padre, 2018) to establish the presence of cultural resources within the roadway slated for improvements. This evaluation determined that disturbed midden materials and mixed colluvium were present in the cut profile along the bank of Marre Road. These midden soils observed were generally disturbed and determined to be most likely

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displaced when the road was originally constructed. For the most part, the existing Marre Road alignment appears to be cut to a depth into bedrock below the midden deposits. In some areas, Marre Road was observed to cut through intact midden soils at road level. Disturbed midden soils were found accumulated along the toe slope along the west and north side of the road, having been gradually deposited by rain, sheetwash and continuous downslope creep (Padre, 2018).

### *Discussion*

Historical Resource. The proposed development may have potential adverse impacts to significant historical resources. The historical Right-of-Way of the horse drawn railroad is believed to be following the existing unfinished access road across the project site (Hazeltine, 2017). Proposed improvements to the existing access roadway has the potential to adversely impact the eastern portion of the historic horse-drawn railroad. In addition, the proposed development is downslope from the historic Marre House will transform a portion of the rural character into a resort environment, which would result in visual impacts to the historic resources.

Archeological Resources. The proposed project, as designed will have potential adverse impacts to significant cultural resources. Widening of the access road and trenching for utility connections will result in subsurface disturbance. Understanding the sensitivity of the cultural sites, the applicant proposed two utility plan options; *Preferred* and *Original* layout (See *expanded Project Description and discussion under Utilities & Services*). The *Preferred Utility* layout minimizes subsurface disturbance through the cultural sites but will require more easements from adjacent parcels. If the easements are not successfully obtained, the applicant will rely on the *Original Utility* layout which will have more subterranean trenching across archeological sites. Aside from utility trenching, portions of the hotel development footprint and associated subterranean improvements (roadway, stormwater underground system, drainage) may also result in significant impacts to the assessed archeological sites.

### *Conclusion/ Further Analysis*

The applicant's Historic Resources Report will need to be independently peer-reviewed, and supplemented as necessary to include and not limited to, additional historic evaluation of the railroad location, impacts associated with on and off-site improvements, and the adequacy of recommended mitigation measures to reduce project impacts to less than significant levels. The site is located with the coastal viewshed corridor identified in the County's Open Space Element and being considered as part of the historic Marre Ranch, the EIR will provide a discussion of the applicable regulations, including those in the discussion of the potential impacts related to coastal historic resource policies and mitigation measures for project activities and alternatives. Consistency with County's General Plan, LCP policies and CZLUO standards for historic resources should be evaluated as part of this discussion.

The applicant's Archeological Resources Assessments will need to be further evaluated, peer-reviewed, and supplemented to include and not limited to, additional tribal inputs from AB52 consultation meetings, adequacy of recommended mitigation measures, development of project alternatives, and additional evaluation of all on and off-site improvements proposed. The EIR will provide a discussion of project impacts for each alternative and mitigation measures for project activities. Consistency with County's General Plan, LCP policies and CZLUO standards for archeological sensitive areas (ASA) should be evaluated as part of EIR discussion. Potential impacts to Cultural Resources could be significant and unmitigable (Class 1).

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Future additional subsurface work shall be coordinated through the County with Tribal Representatives before any work is conducted for any development of further testing or impact determination. Future tribal consultation will include project site avoidance design features, acceptable minimization measures and data excavation mitigation program. In the event of a Class 1 unmitigable significant impact is found, the County will coordinate with Native American tribes on the development of treatment plans as part of the mitigation measures.

### *Sources*

See Exhibit A.

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### VI. ENERGY

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

#### *Setting*

The proposed project is a new hotel development which is subject to current state law and building codes for energy and water efficiency. Construction best management practices include efficient energy and waste management, which is standard industry practice and state regulated.

#### *Discussion/ Further Analysis*

The proposed project is not anticipated to result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during regular operations and construction.

The EIR will need to provide discussions on potential energy impacts generated from both construction and operational phases. Relevant California Building codes and regulations, Green Building measures, CZLUO energy standards, and energy efficiency policies set forth in the Conservation and Open Space Element should be considered in the overall evaluation and consistency findings.

#### *Sources*

See Exhibit A.

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### VII. GEOLOGY AND SOILS

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



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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Setting

The topography of the site slopes downward to the south and west. At the existing unpaved access road (Marre Road), the slope decreases to near level for approximately 500 feet before sloping steeply downward towards Avila Beach Drive. Surface drainage follows the existing topography and flows naturally in three general directions; southwest toward Wild Cherry Canyon, central and southern towards an existing gully down the bluff face and Avila Beach Drive at the toe of the bluff, and southeast towards the Ana Bay Drive before dispersed into San Luis Obispo creek. The site is located within a Geologic Study Area (GSA) as mapped in the County’s Land Use Element.

The proposed project, associated utilities and access road improvement would traverse a variety of terrains, geological conditions and hazards. The applicant has prepared a Geologic Coastal Bluff Evaluation (GeoSolutions, 2016) that covered existing geologic condition evaluation, bluff retreat rates and slope stability analysis, landslide and liquefaction, faulting and seismic, tsunami and flooding, and groundwater and drainage. The applicant also submitted a Soils Engineering Report that evaluated the suitability of the on-site soils for the proposed development.

The project area is underlain by the Squire member of the Miocene-Pliocene Pismo Formation, which has high paleontological sensitivity. The applicant submitted a Paleontological Resource Assessment (Applied EarthWorks, 2017) which included record search, comprehensive literature and geologic map review, a field reconnaissance survey and recommendation for mitigations to minimize potential adverse impacts to significant vertebrate fossils. Paleontological resources had been previously found near the site.

### Discussion

The primary geotechnical concerns for the property were identified as follows: the presence of loose surface soils, the potential for differential settlement occurring between foundations supported on two soil materials having different settlement characteristics, such as soil and rock and also, the proximity to a steep and tall bluff face. The site also lies approximately 300 feet north of a potential capable fault.

The bluff is actively eroding and is expected to continue to retreat. An initial bluff retreat rate of was determined during the previous Geologic Coastal Bluff Evaluation (GeoSolutions, May 30, 2008). During the intense storms in 2011, removal of and regrading of the bluff was performed by the County of San Luis Obispo due to slope failures. Due to existing drainage patterns, a gully has formed in the central portion of the site. Erosion can be observed on the bluff face, where run off have flowed, concentrated and dispersed over the base of the bluff at Avila Beach Road. Though the site vicinity is mapped with low landslide hazard potential (SLO County Safety Element 1999), the northwestern boundary of the site near the intersection of the Marre Road and Ana Bay Drive has been mapped with a high landslide hazard (Hanson et al, 1994).

## Initial Study – Environmental Checklist

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The soils report recommended conventional foundations for the cottages and drilled cast-in-place caissons for the main lodge. These foundations systems typically require over-excavations, compactions and deep borings. It is recommended that the 100-year bluff retreat rate is separated into western and eastern portions, approximately 59 and 82 feet which includes an additional 23-foot slope stability buffer. The stormwater drainage system proposed subsurface collection into ten drainage management areas (DMA). The collected stormwater will be treated by a non-retention-based vault-like system before conveyed offsite via pipes. *For more stormwater discussion, see section Water Quality/ Hydrology.*

Though paleontological assessment did not find significant resources in the project area, the formation beneath the site is considered to have high paleontological resource potential and the construction has the potential to adversely impact scientifically significant vertebrate fossils. The assessment recommended mitigation measures to include a Paleontological Resource Monitoring and Mitigation Plan, consistent with the County's Conservation and Open Space Element paleontological resource treatment policies.

### *Conclusion/ Further Analysis*

The applicant's Geologic Coastal Bluff Evaluation will need to be independently evaluated, peer-reviewed, and supplemented to include and not limited to, additional engineering geologic investigations evaluating the impacts of the roadway alignment particularly on slope stability, erosion and sedimentations, and landslide hazards. The existing drainage and erosion around the gully also require additional analysis, and if required any remediation recommendations as related to the roadway construction, utility installations and project drainage. Additional landslide hazard investigation on both onsite and offsite roadway re-alignment and widening at Ana Bay Road and Marre Road (access road) should be conducted.

The installation and maintenance of the proposed stormwater system may result in additional subsurface disturbance and should be further evaluated, both onsite and offsite if additional conveyance is required. The analysis should include geologic stability of discharge points and any potential long-term erosion and sedimentations and its impacts on the overall stability of the site and vicinity.

The Paleontological Resource Assessment and recommendations should be peer-reviewed for adequacy to reduce any potential adverse impacts to significant paleontological resources during the construction and any off-site improvements related to the project.

The EIR will provide a discussion of results from all the analysis, potential impacts, and any necessary mitigation measures for Project activities and alternatives in accordance with the SLO County General Plan Land Use and Safety Element, LCP policies for Hazards, the CZLUO standards on Shoreline Structures, Grading, Drainage, Sedimentation and Erosion Control and Geologic Study Area.

### *Sources*

See Exhibit A.

## Initial Study – Environmental Checklist

### VIII. GREENHOUSE GAS EMISSIONS

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

#### Setting

Greenhouse Gas (GHG) emissions are said to result in an increase in the earth’s average surface temperature. This is commonly referred to as global warming. The rise in global temperature is associated with long-term changes in precipitation, temperature, wind patterns, and other elements of the earth’s climate system. This is also known as climate change. These changes are now thought to be broadly attributed to GHG emissions, particularly the increased amounts of carbon dioxide (CO2) and other GHGs emissions that result from the human production and use of fossil fuels.

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

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

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

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

## Initial Study – Environmental Checklist

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

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

### *Discussion*

According to the SLO County APCD, a project would have less-than-significant GHG emissions if it would meet one or more of the following criteria: be consistent with a qualified GHG reduction plan, result in operational-related GHG emissions of less than 1,150 metric tons of CO<sub>2</sub>e a year, or result in operational-related GHG emissions of less than 4.9 metric tons of CO<sub>2</sub>e per service population (residents plus employees). The County does not have a qualified GHG reduction plan. Therefore, the determination of significance is based on the emission estimates.

The proposed project would release emissions over the short term as a result of construction activities and over the long term from additional traffic generation and operation of the hotel. Based on the analysis results, the project would generate approximately 1,115 metric tons of CO<sub>2</sub>e which is below the SLO County APCD’s numeric significance threshold of 1,150 metric tons CO<sub>2</sub>e.

The County adopted the EnergyWise Plan in November 2011 outlining the County’s approach to reducing GHG emissions through number of goals, measures and actions to meet the County’s 15% reduction target below baseline levels by 2020. The proposed project intends to incorporate various elements consistent with the EnergyWise Plan recommendations.

### *Conclusion/ Further Analysis*

The applicant’s Air Quality Impact Technical Report and emissions calculations will need to be independently peer-reviewed, and supplemented (as needed) to include the Transportation Demand Management (TDM) as part of the EIR analyses. The EIR should also include an inventory of GHG emissions and a discussion of policy consistency and mitigation feasibility as proposed by the applicant and required by APCD to reduce or offset emissions as necessary.

### *Sources*

See Exhibit A.

## Initial Study – Environmental Checklist

### IX. HAZARDS AND HAZARDOUS MATERIALS

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

## Initial Study – Environmental Checklist

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### *Setting*

The project site is in an area with mixed of residential, commercial, recreation, and undeveloped grazing land. The immediate surrounding properties consist of a residence to the north, the San Luis Bay Inn to the east, undeveloped land to the west, and a coastal bluff to the south.

### *Discussion*

The applicant submitted a Phase 1 Environmental Site Assessment (ESA) which does not document any hazardous materials or conditions on site.

### *Conclusion/ Further Analysis*

The report will need to be reviewed and augmented as needed, to include wildfire hazard analysis and site development standards for emergency evacuation. The Avila Community Plan, SLO County Safety Element and County Hazard Mitigation Plan are currently being updated and local emergency evacuation and wildfire hazards risks are a major concern for the Avila Beach town residents. The EIR shall provide a discussion of the potential impacts related to wildfire hazards and emergency responses consistent with the future direction of the Avila Community Plan, SLO County Safety Element, Hazard Mitigation Plan and the Diablo Evacuation Area Plan prepared by the SLO County Office of Emergency Services.

### *Sources*

See Exhibit A.

## Initial Study – Environmental Checklist

### X. HYDROLOGY AND WATER QUALITY

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

## Initial Study – Environmental Checklist

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### *Setting*

The proposed project is within the Avila Valley sub-basin of the larger San Luis Obispo groundwater basin. The topography of the project is moderate to steeply sloping. The closest creek, San Luis Obispo Creek is approximately 500 feet away. As described in the NRCS Soil Survey, the soil surface on site is considered to have moderately low erodibility and is considered moderately drained. The project site is not located within a 100-year flood zone.

### *Discussion*

The project site currently has an existing gravel access road which runs in east west direction and has one existing drainage inlet and storm drain at the easterly end of the site conveying runoff beneath Ana Bay Road to the Pacific Ocean via San Luis Obispo Creek. There is no existing on-site stormwater drainage infrastructure (Flowers & Associates, 2018).

The proposed project will result in approximately 20,300 cubic yards of cut and 18,000 cubic yards of fill, totaling in approximately 7 acres of site disturbance on the 22.5-acre parcel. The project is within the County's drainage review area and all grading and operational activities are subject to drainage and erosion and sedimentation control standards set forth in the CZLUO. The project design includes the use of drainage management areas, permeable pavers, low impact development measures and preservation of natural drainage features. All project activities will be subject to applicable County and State requirements for construction and post-construction drainage design and stormwater control plans.

### *Conclusion/ Further Analysis*

The EIR shall include an evaluation of the adequacy of the preliminary plans, analysis and discussion on potential impacts related to on and off-site improvements and any necessary mitigation measures for Project activities and alternatives, as necessary. The EIR should also include a discussion of policy consistency in accordance with the SLO County General Plan Land Use and Safety Element, LCP policies for Coastal Watersheds, Countywide programs such as Resource Management System, Master Water and Sewerage Plan and the CZLUO standards on Grading, Drainage, Sedimentation and Erosion Control and Geologic Study Area.

### *Sources*

See Exhibit A.



## Initial Study – Environmental Checklist

### XI. LAND USE AND PLANNING

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

#### *Setting*

The site is an existing 20-acre vacant parcel. It is in the Recreation land use category and identified in the San Luis Bay Estates Master Development Plan (SLBE MDP) to support a 4-acre hotel development as an extension of the existing San Luis Bay Inn on the adjacent parcel.

#### *Discussion/ Conclusion*

The proposed project is an allowed use on the site and is consistent with the SLBE MDP. The development is on a vacant site and will not physically divide an established community in Avila Beach. The project will provide additional transient accommodation and creating new employment opportunities in Avila. This is consistent with the LCP policies to promote tourist serving developments. As proposed, the project is not considered to cause significant impacts or conflicts to County local coastal program, policies and San Luis Bay planning area standards. The project includes an amendment to the SLBE MDP to enlarge the previously approved development area from 4-acres to 7 acres in order to accommodate an expanded hotel operation, independent of the San Luis Bay Inn.

The EIR will provide a detailed discussion on the applicable conditions, regulations and standards in the SLBE MDP, San Luis Bay Area Plan, CZLUO and policy consistency with SLO County Local Coastal Program.

#### *Sources*

See Exhibit A.

## Initial Study – Environmental Checklist

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### XII. MINERAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
(a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b) Result in the loss of availability of a locally- important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

#### *Setting*

The site is not mapped on the County's General Plan or related documents as to contain known mineral resources of value to the region and residents of the state.

#### *Discussion/ Conclusion*

The proposed project will not result in any loss in the availability of any known mineral resource that would be of value to the region and the residents of the state nor in any loss of a locally important mineral resource recovery site delineated on the SLO County's General Plan.

#### *Sources*

See Exhibit A.

## Initial Study – Environmental Checklist

### XIII. NOISE

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

#### Setting

The application submitted a Noise Assessment which modeled existing and future transportation noise impact and the potential noise impacts of on-site operations per three scenarios; *project site with no development, with proposed development, and project site with built project in the year 2037*. Noise modeling of the site was based on sound level measurements and average daily traffic volume on Avila Beach Drive and interior roads. Existing sound level at residences near the development are in the range of daytime Leq = 35 dBA to 45 dBA.

#### Discussion/ Conclusion

The project would generate a temporary increase in noise in the project area and vicinity. The modelling is conceptual because grading and construction plan is not developed at the time of assessment, which precluded information on equipment types, equipment travel paths and construction time frames. The assessment assumed conventional construction techniques and equipment. Using standard point source calculations, combined level of 91 dBA Leq will attenuate to approximately 65 dBA Leq at 1,000 feet where the nearest sensitive receptors are identified (San Luis Bay Inn hotel and a residence). The project is not anticipated to generate significant noise impacts because construction noise levels would be less than 75 dBA Leq at the residence and hotel. The report included noise minimization measures to be considered and adopted where feasible. Implementation of the measures will help further reduce the noise impacts of the proposed project.

## Initial Study – Environmental Checklist

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The EIR should evaluate the noise assessment for CZLUO compliance and SLO County Noise Element policy consistency.

### *Sources*

See Exhibit A.

## Initial Study – Environmental Checklist

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### XIV. POPULATION AND HOUSING

	<b>Potentially Significant Impact</b>	<b>Less Than Significant with Mitigation Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
<i>Would the project:</i>				
(a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

#### *Setting*

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

#### *Discussion/ Conclusion*

The project does not displace any residents living or working in the vicinity nor induce any substantial population growth in the area. No on-site caretaker accommodation is proposed, and all employees would travel to and from the site daily. Existing roads are being utilized for access. The project will not result in a need for a significant amount of new housing and will mitigate its cumulative impact to the shortage of affordable housing stock by payment of the housing impact fee effective July 1, 2019. No mitigation measures are necessary.

#### *Sources*

See Exhibit A.

## Initial Study – Environmental Checklist

### XV. PUBLIC SERVICES

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

#### Setting

The site is currently vacant and undeveloped. The parcel is in the Recreation land use category, which consistent with the San Luis Bay Estates Master Development Plan (SLBE MDP) and supports the development of a hotel.

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

Police: County Sheriff	Location: South Patrol approximately 9.7 miles southeast of project site
Fire: Cal Fire	Location: 62 Avila Valley approximately 1.75 miles northeast of project site
	Hazard Severity: Moderate to High      Response Time 5-10 minutes
School District:	San Luis Coastal Unified School District / San Luis Obispo Joint Community College District

## Initial Study – Environmental Checklist

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### *Discussion/ Conclusion*

The proposed project will include the construction of new structures fitted with code compliant fire sprinkler systems and materials, as well as a new emergency egress, fire hydrants on the property and a minimum 100' defensible area surrounding the new buildings. The project will be required to obtain necessary permissions and maintenance agreements for the defensible areas outside of the site and improve the existing access road to minimum 20' width for emergency vehicles. The reduced width has been agreed by Cal Fire in order to minimize impacts to cultural materials on site. Per the condition of the SLBE MDP, the applicant is proposing to amend the MDP to expand the building envelope up to 7 acres. The remaining 14 acres will be dedicated as permanent open space. Due to the transient occupancy nature of the project, no significant impacts to school, police service and public facilities are anticipated.

### *Sources*

See Exhibit A.

## Initial Study – Environmental Checklist

### XVI. RECREATION

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

#### Setting

The site is located on an elevated bluff, east of Avila Beach Drive overlooking the Pacific Ocean. Physically, the site does not have existing trail or pedestrian connections to nearby Bob Jones trail or the beach. The County’s Parks and Recreation Element does not show that a potential trail goes through the proposed project.

#### Discussion

The project will attract additional tourists to the local beach and increase the number of users of Bob Jones trail, which is a popular multi use trail along the golf course for residents in the San Luis Obispo County. The applicant is considering providing a pedestrian trail along Wild Cherry Canyon creek to Avila Beach Road and beach access if easements on adjacent properties can be obtained. Proposed trails along the Wild Cherry Canyon may be in potential biologically sensitive areas and proposed access points on Avila Beach Road will require additional safety analysis. The proposed project includes dedicating 14 acres of its remaining undeveloped area as permanent open space.

#### Conclusion/ Further Analysis

The EIR shall include a discussion on the feasibility of creating connector trails to the Bob Jones trail, Wild Cherry Canyon, pedestrian beach access and the capacity to support additional users and potential impacts related to new trails and beach access in the project vicinity.

#### Sources

See Exhibit A.



## Initial Study – Environmental Checklist

### XVII. TRANSPORTATION

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

#### Setting

The County has established the acceptable Level of Service (LOS) for road intersections within the Avila Beach Urban Reserve Line as “D” or better. The San Luis Bay Coastal Area Plan notes that Avila Beach Drive shall not be subject to traffic levels exceeding LOS C based on counts conducted on a weekday in May. Therefore, in July 2016, the County Board of Supervisors directed staff to require all Avila Beach projects subject to CEQA requiring a traffic study evaluating both traffic impacts during the second week of May and during the most appropriate time period relative to the proposed land use as an interim approach until the Avila Beach Community Plan Update is finalized. The project was referred to Public Works, and a summer Saturday mid-day was identified as the most appropriate time period for traffic evaluation in addition to the regular weekday in May.

Circulation Study Area. The project is within the San Luis Bay Circulation Fee area. This fee provides the means to collect “fair share” monies from new development to help fund certain regional road improvements that will be needed once the area reaches “buildout”. The project will be subject to this fee.

#### Discussion

The construction of the proposed hotel will introduce new traffic volumes. Access roads and driveway improvements, offsite utility extensions to the site, grading and construction activities i.e. construction workforce and associated equipment vehicles will result in temporary traffic impacts on the existing roadways. Once completed, the hotel will be operating 24-hour, maintained by various staff working in 3 to 4 shifts. Medium to large scale temporary events will require additional event staffing.

## Initial Study – Environmental Checklist

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Ten intersections were evaluated during the weekday afternoon (4-6pm) and summer Saturday mid-day (11am-1pm) time period, and five roadway segments were evaluated using AFT thresholds for County operated facilities and during the PM peak hour for Caltrans facilities. The study intersections were evaluated under the analysis scenarios; *Existing Conditions*, *Existing Plus Project Conditions*, *Cumulative Conditions*, and *Cumulative Plus Project Conditions*.

The Applicant's Transportation Impact Study (TIS) (Central Coast Transportation Consulting, 2018) found during regular operations, the weekday project trip generation estimated 738 new daily trips and 57 new PM peak hour trips. The Saturday estimate shows 756 new daily trips and 76 new PM peak hour trips. The study also evaluated the large and medium temporary event scenarios; large events up to 200 attendees with restaurant closure and medium events up to 100 attendees with the restaurant remain open to the public. The large event scenario assumes 50% attendees to be hotel guests and employees resulting in a total 76 peak hour project trips, equal to the Saturday mid-day period trip generation. The medium event scenario assumes 25% attendees to be hotel guests and employees resulting in a total 106 peak hour project trips, which exceeds the 100 peak hour trips threshold per BOS Resolution 2008-152 warranting frontage improvements.

The current roadways within the Avila Beach urban areas have been identified as operating at unacceptable levels and is a primary concern for the residents. Avila Beach Drive currently is the only single arterial road providing access and egress in the downtown area which presents a bottleneck concern particularly during an emergency. The proposed project will worsen existing deficient intersections; *Avila Beach Drive / Ontario Road and Avila Beach Drive / US 101 SB Ramp/ Shell Beach Road*. The County established a Roadway Impact Fee program that funds improvements needed at those deficient intersections and the project will be subject to the impact fees. However, the timing of those permanent improvements is hard to determine and as such, interim impacts can be severe until such improvements are implemented. Currently, the TIS evaluation did not include impacts from construction traffic, proposed hotel shuttle trips for guests, and proposed off-site parking for temporary events. The project proposed to accommodate small and large-sized event parking on site. Medium-sized events will utilize off-site parking and shuttle bus via a Transportation Demand Management plan (TDM).

Primary access to the hotel will be via Marre Road, an existing private gravel driveway obtained through an easement from San Luis Bay Inn. All guests will turn into Ana Bay Road from Avila Beach Drive before heading up Marre Road to the hotel. This connection is a sharp turn and requires substantial improvement to allow for emergency vehicles. The remainder of Marre Road will undergo upgrades to meet minimum 20' width as allowed by Cal Fire. The project proposes a secondary emergency egress via Blue Heron Road to Coffeeberry Place and Lupine Canyon Road, allowing access to San Luis Bay Drive and Avila Beach Drive without going through downtown Avila Beach. Per the applicant, the project secured access rights to use the San Luis Bay Estates private roads for emergency purposes. Pedestrian access to the beach will be primarily via hotel provided shuttle service or a potential pedestrian trail along Wild Creek Cherry Canyon.

### *Conclusion/ Further Analysis*

The applicant's Transportation Impact Study and draft TDM will need to be independently peer-reviewed and augmented (as needed) at part of the EIR analyses. The EIR should focus on the contribution of new traffic volumes and parking impacts associated with construction, typical hotel operations, and temporary events (including shuttle trips). Under typical hotel operations and temporary events scenario, parking allocations both on and off site should be reviewed thoroughly. The viability of the emergency access via

## Initial Study – Environmental Checklist

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private roads and pedestrian access to the beach and local trails should be reviewed in further detail. Additional information such as potential impacts related to Travel Demand Management (i.e. offsite parking, additional shuttle trips) and pedestrian access paths should be developed and reviewed for efficacy in reducing traffic impacts associated with temporary events and pedestrian safety along Avila Beach Drive.

The EIR should review the adequacy of the various scenario analyses, the recommendations set forth in the applicant's traffic reports and the feasibility of the proposed project features and recommended mitigations in terms of short and long-term impacts to the community. The timeline for the improvements funded by the County Roadway Fee Program and the goals of the (updated) Community Plan, and other applicable plans i.e. Countywide Bike Plan, Port Harbor Parking Management Plan should be considered in the overall evaluation.

### *Sources*

See Exhibit A.

# Initial Study – Environmental Checklist

## XVIII. TRIBAL CULTURAL RESOURCES

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

### Setting

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

1) Sites, features, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:

a. Included or determined to be eligible for inclusion in the California Register of Historical Resources; or

b. Included in a local register of historical resources as defined in subdivision (k) of California Public Resources Code Section 5020.1.

2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of California Public Resources Code Section

## Initial Study – Environmental Checklist

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*5024.1. In applying these criteria for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American Tribe.*

The applicant had engaged a local cultural resource management firm to perform initial archaeological investigations for the project which includes records search, archeological survey, coordination with Northern Chumash tribal representatives, Extended Phase 1 and Phase 2 testing at the project area. These reports were submitted to the County and reviewed by local tribes as part of the AB52 consultation process. To initiate the AB52 process, the County notified four Native American tribes in April 2018; Northern Chumash Tribal Council (NCTC), yak tityu tityu yak tilhini Northern Chumash Tribe (YTT), Salinan Tribe of Monterey and San Luis Obispo Counties (STMSLO), and Xolon Salinan Tribe (XST). The NCTC and YTT groups requested consultations and STMSLO responded via email to the County.

The proposed project is in an area historically occupied by Native American tribes on the shores of San Luis Obispo Bay. The archeological assessments found several significant prehistoric villages and settlement sites on the project area and vicinity. Human remains have been discovered in the project vicinity when the golf course, Avila Beach Drive and the San Luis Bay Inn were developed. The presence of human burials in these large settlement sites on the coastal ridge historically associated with the Chumash occupation leads to strong Native American tribal association with significant cultural landscape in their tribal cultural resources. The YTT Northern Chumash Tribe (YTT) and Northern Chumash Tribal Council trace their ancestry to an ethnohistoric village, *Sejato* in Avila Beach and many believe that one of the recorded sites on the project area are the remains of this village. As such, the archeological sites within the project area hold important cultural value for the Northern Chumash (Applied Earthworks, 2015). Feedbacks from tribal consultations and emails expressed strong opposition to the proposed project. The tribes collectively view the project site as a significant cultural landscape and the presence of several recorded cultural sites with human burials in the area represents highly sensitive tribal cultural resources to the tribes. This sentiment was also strongly indicated by both Chumash tribe representatives during the AB52 consultation process.

Large portions of these sites have been destroyed by erosion, illegal excavation and development of Avila Beach which includes the golf course, San Luis Bay Inn, Avila Beach Drive, and historic railroad construction. As a result of these impacts, which largely occurred prior to the enactment of CEQA, a period in Chumash history with evolving social complexity and settlement pattern has largely been lost. Although the archeological assemblage at one of the smaller site (CA-SLO-2440) is not large, the lack of Chumash archeological record in San Luis Obispo Bay makes this site even more important to the Native American tribes due to its association with the main village (now destroyed) and it can provide insight into Chumash life on the shoreline of San Luis Obispo Bay during the Late Period. The site evaluations determined that CA-SLO-2440 to be eligible for listing on the CRHR under Criterion 1.

### *Discussion*

The proposed development will require both on and off-site improvements and most of these improvements are subterraneous. The existing access road (Marre Road) is currently a 16' wide unpaved road that connects to Ana Bay Road and it traverses across a significant cultural site. The applicant has incorporated several design and project approaches such as clustering development footprint on the west portion on the property, utilize deep horizontal borings for service utilities and obtained CalFire's approval to have a reduced roadway width in order to minimize impacts to tribal cultural resources. The applicant also proposed two utility layout options (*Preferred and Original Utility layout*) to minimize subterraneous utility installations on the project site (*refer to Utilities and Service Systems section for detailed discussion*). The proposed development also will change the existing landscape into a more resort-like environment, which

## Initial Study – Environmental Checklist

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the change in character may be an adverse impact on the tribal cultural resource for the Northern Chumash tribes.

### *Conclusion/ Further Analysis*

The applicant's Archeological Resources Assessments will need to be independently peer-reviewed by experts in the Central Coast Chumash history, and supplemented to include and not limited to, additional tribal inputs from AB52 consultation meetings, evaluation of the adequacy of recommended mitigation measures, development of project alternatives, and additional evaluation of all on and off-site improvements proposed. The EIR will provide a discussion of project impacts for each alternative and mitigation measures for project activities. Consistency with County's General Plan, LCP policies and CZLUO standards for archeological sensitive areas (ASA) should be evaluated as part of EIR discussion. Potential impacts to Tribal Cultural Resources could be significant and unmitigable (Class 1).

Future additional subsurface work shall be coordinated through the County with Tribal Representatives before any work is conducted for any development of further testing or impact determination. Future tribal consultation will include project site avoidance design features, acceptable minimization measures and data excavation mitigation program. In the event of a Class 1 unmitigable significant impact is found, the County will coordinate with Native American tribes on the development of treatment plans as part of the mitigation measures.

### *Sources*

See Exhibit A.

## Initial Study – Environmental Checklist

### XIX. UTILITIES AND SERVICE SYSTEMS

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

#### Setting

The proposed development’s water and sewer service is provided by San Miguelito Mutual Water Company (SMMWC). The applicant is entitled to 14 Acre Feet per Year (AFY) of SMMWC water and is estimated to use 11.3 AFY of water in a typical 72% occupancy scenario and 12.4 AFY in a 100% occupancy scenario. Both estimates include using 2.6 AFY and 3.32 AFY of graywater respectively for landscaping in the water analysis (Dudek, 2017).

Recycled Water. SMMWC has plans to provide recycled water to the golf course and potentially, the project site in the future. However, the existing wastewater treatment plant (WWTP) does not currently produce recycled water and as such, there is no existing transmission main in place. There is an abandoned 6-inch

## Initial Study – Environmental Checklist

PVC force main from Lift Station No. 3 near Wild Cherry Canyon to the existing WWTP that could likely be repurposed as a recycled water transmission pipeline (Figure 1).

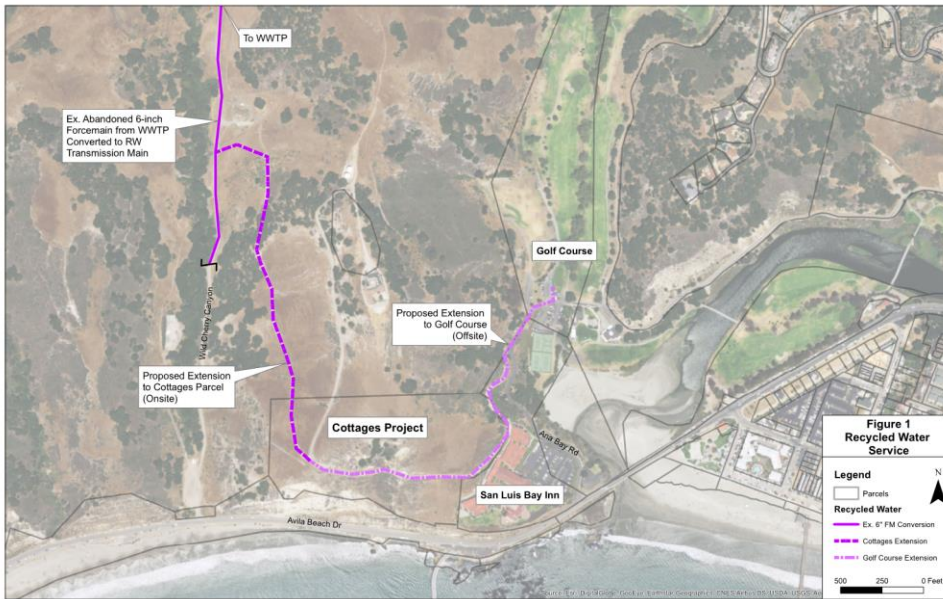


Figure 1.

**Other Utility.** The applicant proposed two utility plans for the project; **Original Utility** (Figure A) and **Preferred Utility** (Figure B) options (for more information, see detailed Project Description in Appendix B). Preferred Utility option was developed later after initial permit application to minimize subterraneous disturbance on site due to sensitive tribal and cultural resources and this option requires additional offsite easements for various connection and discharge points.

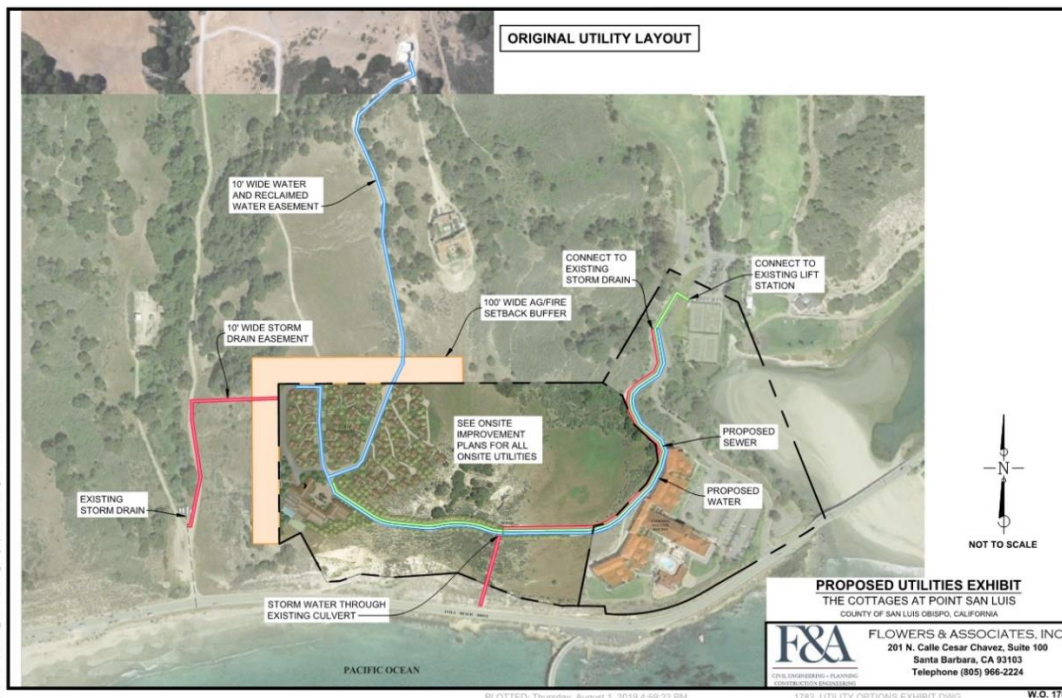


Figure A Original Utility layout



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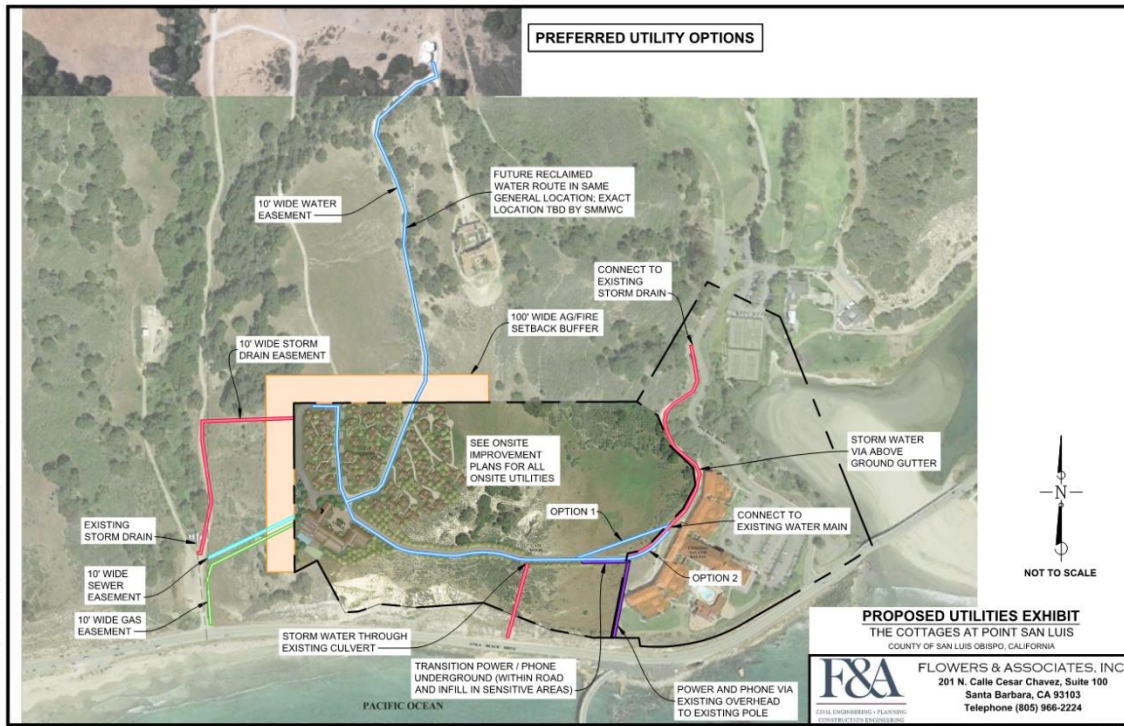


Figure B Preferred Utility layout

Summary of differences between the two utility layout options:

Utility	Original Layout (Figure A )	Preferred Layout (Figure B)
Water	New line connects to existing tie-in at Ana Bay Road. Upgrades to existing offsite pipes anticipated.	New line connects to existing water main at rear of San Luis Bay Inn. No upgrades to existing offsite pipes anticipated.
Sewer	Sewer lines routed underground along improved access road (Marre Road) and connect to existing sewer pump station at Ana Bay Road	Sewer lines routed from an existing sewer main near Wild Cherry Canyon/Avila Beach Drive
Gas	Gas lines routed underground along improved access road and connect to main at Ana Bay Road.	Gas lines routed from an existing main near Wild Cherry Canyon/ Avila Beach Drive.
Power/Comm	Same as Preferred Layout	Extend existing overhead lines from Cal Poly Pier over Avila Beach Drive to top of bluff, transitioning underground in fill along access road ( Marre Road).
Stormwater	Same as Preferred Layout	West and southward run offs are collected via underground pipes and discharged to existing stormwater drain and culvert at Wild Cherry Canyon/ Avila Beach Drive. Eastward sheet drainage along access road towards existing storm drain at Ana Bay Road

## Initial Study – Environmental Checklist

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### *Discussion*

Both utility options include extending the overhead power and communication lines across Avila Beach Road to the top of the bluff, which may result in adverse impact to the bluff stability and visual quality of the area. The extension may require an additional new power pole or upgrades to the existing pole currently located at the top of the southern bluff face before the utility cables transition underground along Mare Road. Stormwater is designed to be collected in various drainage management areas (DMA) around the development, which requires installation of underground cisterns and piping. This subterranean system may have adverse impacts to the cultural resources and geologic stability of the site. Offsite pipe installations and connections close to Wild Cherry Canyon creek and Ana Bay Road may have potential impacts to significant biological and cultural resources.

The applicant submitted an intent-to-serve letter from SMMWC which provides evidence of adequate water and wastewater service for the proposed development. With the usage of graywater system onsite, the project's estimated water needs are within the allocated 14 AFY and evidenced by an intent-to-serve letter by SMMWC. The inclusion of graywater system and potentially, recycled water system for irrigation may further increase the water supply for the project. The proposed project is not anticipated to generate solid waste in excess of State or local standards and SMMCW is a community waste service provider that is subject to federal and state compliances.

### *Conclusion/ Further Analysis*

The applicant's utility assessment and water analysis will need to be peer-reviewed, and supplemented to include and not limited to, feasibility evaluation of both *Preferred* and *Original Utility* options and impacts assessment for all on and off-site improvements per the two options. The utility service requires various levels of infrastructure improvement i.e. utilizing abandoned lift station, reusing or potentially upgrading existing pipelines, installations of new underground pipelines and deep drainage pits, and extending power lines above ground.

The EIR should review the feasibility of reusing the existing infrastructure and tie-ins including the abandoned wastewater line and evaluate impacts associated with upgrades and extensions of wastewater lines for future recycled water, additional on site and off site biological, visual and tribal cultural impacts associated with subterranean and above ground utility extensions and stormwater infrastructure. The EIR should also evaluate the adequacy of both *Preferred* and *Original Utility* options including the feasibility of obtaining off-site easements, the recommendations set forth in the initial applicant's utility reports, and feasibility of proposed mitigations in terms of short and long-term impacts to the community served by the service providers. Consistency with policies set forth in the County's General Plan, Resource Management System, Master Water and Sewerage Plans, Local Coastal Plan, Avila Community Plan and CZLUO standards for utility service, capacity, and resource protection should be evaluated as part of this discussion.

### *Sources*

See Exhibit A.

## Initial Study – Environmental Checklist

### XX. WILDFIRE

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

#### Setting

**Fire Hazard Severity Zones.** In central California, the fire season usually extends from roughly May through October, however, recent events indicate that wildfire behavior, frequency, and duration of the fire season are changing in California. *Fire Hazard Severity Zones* (FHSZ) are defined by the California Department of Forestry and Fire Protection (CALFIRE) based on the presence of fire-prone vegetation, climate, topography, assets at risk (e.g., high population centers), and a fire protection agency’s ability to provide service to the area (CAL FIRE 2007). FHSZs throughout the County have been designated as “Very High,” “High,” or “Moderate.” In San Luis Obispo County, most of the area that has been designated as a “Very High Fire Hazard Severity Zone” is in the Santa Lucia Mountains, which extend parallel to the coast along the entire length of San Luis Obispo County.

**Wildland Fire – Responsibility Area.** Within San Luis Obispo County, Cal Fire is responsible for wildland fire protection of almost 1.5 million acres within the county. There are three levels of responsibilities mapped for the County; *Federal Responsibility Areas* (FRA) includes lands owned and administered by various federal agencies within the County, *State Responsibility Areas* (SRA) includes areas with sufficient vegetation to pose a potential wildland fire threat and has a residential density of less than three residences/ acre for in areas

## Initial Study – Environmental Checklist

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exceeding 250 acres, and lastly, *Local Responsibility Area* (LRA) which covers areas with insufficient vegetation to pose a potential wildland fire threat or incorporated areas with own fire protection services.

The project site is in both High and Medium Fire Hazard Severity Zones. The proposed development clustered on the western portion of the site falls under High Fire Hazard Severity Zone. The project site is within the State Responsibility Area for wildland fire protection. The closest CalFire station is located approximately 1.75 miles to the northeast of the project site and provides a response time of less than 10 minutes.

### *Discussion*

The project site is located at the top of a coastal bluff with predominantly moderate to strong wind throughout the year. The project site itself may not have a lot of potential fuel, but its proximity to natural woodlands surrounding the Wild Cherry Canyon and grazing land presents higher risks of fuel especially during the summer months when vegetation is drier. The project design includes 50 independent cottages ranges from 550 to 850 square feet each (habitable hotel units) across the western portion of the site, extending the access road from the narrow turn at Ana Bay Road, installing portions of overhead power lines across the bluff face, and relying on a privately maintained emergency egress through the San Luis Bay estates. The layout of the new structures on a sloping bluff with a single access road and private egress route may exacerbate fire and emergency risks. The project also includes installing a 100' fuel break zone on adjacent property which will require easements to be obtained for regular maintenance. The proposed development, hotel guests and staff may be also exposed to post-fire slope instability due to geologic instability at the southern portion of the site (*for more information, see discussion on Geology & Soils*).

### *Conclusion/ Further Analysis*

The SLO County Safety Element establishes goals, policies, and programs to reduce the threat to life, structures, and the environment caused by fire. Policy S-13 identifies that new development should be carefully located, with special attention given to fuel management in higher fire risk areas, and that new development in fire hazard areas should be configured to minimize the potential for added danger.

The EIR should evaluate the proposed development pursuant to the SLO County's Safety Element and Hazard Mitigation Plan which are currently being updated. The discussion should also include any applicable fire safety regulations, adequacy of emergency access and identify any potential impacts related to wildfire and mitigation measures for all project activities and alternatives.

### *Sources*

See Exhibit A.

## Initial Study – Environmental Checklist

### XXI. MANDATORY FINDINGS OF SIGNIFICANCE

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

#### *Discussion*

As discussed in each resource section above, the proposed project may result in significant impacts to historic, cultural and tribal cultural resources. The potential cumulative impacts of the proposed project may be considerable on the biological resources, coastal visual resources, transportation, utilities and service systems, recreation and noise levels. Human beings may be directly or indirectly effected by potential adverse impacts from geologic and soils stability and wildfire.

## Initial Study – Environmental Checklist

### Exhibit A - Initial Study References and Agency Contacts

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

Contacted	Agency	Response
<input checked="" type="checkbox"/>	County Public Works Department	NOP Sent
<input type="checkbox"/>	County Environmental Health Services	<b>Not Applicable</b>
<input checked="" type="checkbox"/>	County Agricultural Commissioner's Office	NOP Sent
<input type="checkbox"/>	County Airport Manager	<b>Not Applicable</b>
<input type="checkbox"/>	Airport Land Use Commission	<b>Not Applicable</b>
<input checked="" type="checkbox"/>	Air Pollution Control District	NOP Sent
<input type="checkbox"/>	County Sheriff's Department	<b>Not Applicable</b>
<input type="checkbox"/>	Regional Water Quality Control Board	<b>Not Applicable</b>
<input type="checkbox"/>	CA Coastal Commission	<b>Not Applicable</b>
<input type="checkbox"/>	CA Department of Fish and Wildlife	<b>Not Applicable</b>
<input checked="" type="checkbox"/>	CA Department of Forestry (Cal Fire)	NOP Sent
<input type="checkbox"/>	CA Department of Transportation	<b>Not Applicable</b>
<input type="checkbox"/>	Community Services District	<b>Not Applicable</b>
<input checked="" type="checkbox"/>	Other Tribal Organizations; NCTC, YTT & STMSLO	NOP Sent
<input checked="" type="checkbox"/>	Other Avila Valley Advisory Council	NOP Sent

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

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

- |  |  |
|--|--|
| <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Project File for the Subject Application</li> <li><b>County Documents</b></li> <li><input checked="" type="checkbox"/> Coastal Plan Policies</li> <li><input checked="" type="checkbox"/> Framework for Planning (Coastal/Inland)</li> <li><input checked="" type="checkbox"/> General Plan (Inland/Coastal), includes all maps/elements; more pertinent elements:             <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Agriculture Element</li> <li><input checked="" type="checkbox"/> Conservation &amp; Open Space Element</li> <li><input type="checkbox"/> Economic Element</li> <li><input type="checkbox"/> Housing Element</li> <li><input checked="" type="checkbox"/> Noise Element</li> <li><input checked="" type="checkbox"/> Parks &amp; Recreation Element/Project List</li> <li><input checked="" type="checkbox"/> Safety Element</li> </ul> </li> <li><input checked="" type="checkbox"/> Land Use Ordinance (Inland/Coastal)</li> <li><input type="checkbox"/> Building and Construction Ordinance</li> <li><input type="checkbox"/> Public Facilities Fee Ordinance</li> <li><input type="checkbox"/> Real Property Division Ordinance</li> <li><input type="checkbox"/> Affordable Housing Fund</li> <li><input type="checkbox"/> Airport Land Use Plan</li> <li><input type="checkbox"/> Energy Wise Plan</li> <li><input checked="" type="checkbox"/> San Luis Bay Coastal Area Plan</li> </ul> | <ul style="list-style-type: none"> <li><input type="checkbox"/> Design Plan</li> <li><input checked="" type="checkbox"/> Avila Beach Specific Plan</li> <li><input checked="" type="checkbox"/> Annual Resource Summary Report</li> <li><input checked="" type="checkbox"/> Avila Beach Circulation Study</li> <li><b>Other Documents</b></li> <li><input checked="" type="checkbox"/> Clean Air Plan/APCD Handbook</li> <li><input type="checkbox"/> Regional Transportation Plan</li> <li><input checked="" type="checkbox"/> Uniform Fire Code</li> <li><input type="checkbox"/> Water Quality Control Plan (Central Coast Basin – Region 3)</li> <li><input checked="" type="checkbox"/> Archaeological Resources Map</li> <li><input checked="" type="checkbox"/> Area of Critical Concerns Map</li> <li><input checked="" type="checkbox"/> Special Biological Importance Map</li> <li><input checked="" type="checkbox"/> CA Natural Species Diversity Database</li> <li><input checked="" type="checkbox"/> Fire Hazard Severity Map</li> <li><input checked="" type="checkbox"/> Flood Hazard Maps</li> <li><input checked="" type="checkbox"/> Natural Resources Conservation Service Soil Survey for SLO County</li> <li><input checked="" type="checkbox"/> GIS mapping layers (e.g., habitat, streams, contours, etc.)</li> <li><input checked="" type="checkbox"/> San Luis Bay Estates Master Development Plan</li> </ul> |
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## Initial Study – Environmental Checklist

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

### AIR QUALITY

1. *Air Quality Impact Analysis, LSA Associates, Inc., February 2018*
2. *Referral comments from APCD dated April 24, 2018*

### BIOLOGICAL RESOURCES

1. *Biological Resources Assessment, LSA Associates Inc., March 2018*
2. *Biological Resource Assessment Peer Review, Terra Verde, July 2018*
3. *Biological Resources Assessment, LSA Associates Inc., September 2018 amended*
4. *Biological Peer Review Response letter, LSA Associates Inc., September 2018*
5. *Tree Inventory Report, LSA Associates Inc., September 2018*

### CULTURAL & TRIBAL CULTURAL RESOURCES

1. *Cultural Resource Study Phase 1 & Extended Phase 1(limited), Applied Earthworks, January 2015*
2. *Phase II Archaeological Evaluation of SLO-2440, Applied Earthworks, May 2017*
3. *Paleontological Resource Assessment, Applied Earthworks, January 2017*
4. *Archeological Pedestrian Survey of Marre Road, Padre Associates, Inc., December 2018*
5. *Historic Resources Report, Post/ Hazeltine Associates, November 2017*

### GEOLOGY & SOILS

1. *Coastal Bluff Evaluation, GeoSolutions, October 2016*
2. *Soils Engineering Report, GeoSolutions, October 2016*

### HAZARDS & HAZARDOUS MATERIALS

1. *Phase I Environmental Site Assessment, AEI Consultants, November 2007*

### HYDROLOGY & WATER QUALITY

1. *Storm Water Control Plan, Flowers & Associates, Feb – March 2018*
2. *Preliminary Drainage Report, Flowers & Associates, September 2018*
3. *Preliminary Stormwater Control Plan, Flowers & Associates, September 2018 updated*

### NOISE

1. *Environmental Noise Study, 45dB Acoustics, August 2017*

### TRANSPORTATION

1. *Transportation Impact Study, Central Coast Transportation Consulting, Oct 2017*
2. *Transportation Impact Study (Amended), Central Coast Transportation Consulting, Sept 2018 with Appendices*
3. *Draft Special Event Transportation Management Plan, Central Coast Transportation Consulting, April 2019*
4. *Fire Truck Turning Exhibits*
5. *Road Easement Agreement July 28, 1983*
6. *BOS Resolution 2008-152*
7. *Referral Comments from Public Works Dept dated April 24, 2018, May 8, 2018, November 2, 2018*

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### UTILITIES & SERVICE SYSTEMS

1. *Utilities Technical Memorandum (Water, Sewer, & Recycled Water Service), Dudek, July 2017*
2. *Water Use Analysis Technical Memorandum, Dudek, August 2017*
3. *Utilities Technical Memorandum Addendum #1 (Detailed Explanation of Assumptions for Water Use Analysis), Dudek, October 2017*
4. *Conditional Will Serve Water & Sewer Service, San Miguelito Mutual Water Company, November 2017*
5. *Referral comments from Cal Fire dated August 7, 2018*



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### Exhibit B – Detailed Project Description for Environmental Review

The detailed project description is expanded in the following sections below.

**PROJECT TITLE:** Somera (The Cottages Hotel) / Development Plan / Coastal Development Permit  
DRC2018-00033, ED19-008

**PROJECT APPLICANT:** SCM Avila Beach Partners, LLC

**PROJECT DESCRIPTION:** SCM Avila Beach Partners, LLC is requesting a Development Plan/ Coastal Development Permit for the construction of a 50-room cottage style hotel, various sized temporary events not exceeding 200 guests, and modification of side and rear setback standards. The applicant is also requesting a Variance to grade over 30% slopes and an amendment to the San Luis Bay Estates Master Development Plan to increase the potential development area from the previously approved 4 acres to 7 acres. The project will result in the disturbance of approximately 7 acres on the 22.25-acre parcel with an approximate of 20,300 cubic yards of cut and 18,000 cubic yards of fill.

**PROJECT LOCATION:** The project site is in the Recreation land use category and is located approximately 620 feet northwest of the Avila Beach Drive and Ana Bay Drive intersection in the community of Avila Beach. The site is in the San Luis Bay Coastal planning area.

**BACKGROUND:** On August 27, 1981, the San Luis Obispo County Planning Commission certified an Environmental Impact Report (EIR) (ED 80-90) and approved the San Luis Bay Estates Master Development Plan (SLBE MDP). The SLBE MDP covers approximately 1,200 acres consisting of multiple phases of residential development, a commercial and maintenance area, a hotel expansion development plan, an improved golf course, and an area for developing hotel cottage units.

The 1200-acre SLBE MDP designated approximately 24 acres (site), adjacent to and west of an existing hotel property (San Luis Bay Inn), for the purpose of developing 50 hotel cottage units as an adjunct to the existing hotel. The SLBE MDP included the following development standards for developing the hotel cottage units on this site:

- Units to be attached or detached no higher than 35 feet
- Units may have efficiency kitchen units
- Units will be operated as rental units in conjunction with the (existing San Luis Bay Inn) hotel facilities
- Vehicular access will be through the existing hotel entrance
- Development within the cottage parcel will be limited to a maximum of four (4) acres with the remaining areas committed to permanent open space
- Development standards will conform to all Land Use Ordinance standards unless waivers are granted in the development plan approval

#### Proposed San Luis Bay Master Development Plan Amendment

At the time the SLBE MDP was approved, the San Luis Bay Inn and the hotel expansion area (site) were on different parcels but under the same ownership. Since then, the site was sold and is no longer affiliated with the San Luis Bay Inn. Therefore, the applicant is requesting to amend the SLBE MDP to allow for an independent full-service hotel on the site and increase the development area from four (4) acres to seven (7)

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acres to feasibly accommodate the necessary support and ancillary uses such a reception area, restaurant, a pool, and parking.

### **PROPOSED PROJECT COMPONENTS**

#### **Development Summary**

The subject property (APN 076-174-009) is located on an undeveloped site adjacent and west of the San Luis Bay Inn in the community of Avila Beach. Total building development, including underground parking area, is estimated to be 65,291 sq. ft. (net, excluding cottage decks). Overall impervious footprint of the lodge and cottages will be 62,019 sq. ft. or 6.4% of the 22.25-acre site. After including the pool deck, pools, roads and other pathways, the total impervious area will be approximately 15% of the project site. The development envelope for the project, including grading to support structures is expected to be approximately 6.46 acres. The remaining acreage (except that required for access) will be dedicated to permanent open space per the requirements of the SLBE MDP.

The development proposed for “The Cottages” hotel project includes the following:

- Fifty (50) single-story cottages totaling 26,402 sq. ft. (averaging 550 sq. ft. each)
  - Clustered on the west portion of the property
  - Each cottage will have a porch and/or a deck
  - Developed in 6 different configurations ranging from 415 sq. ft. to 845 sq. ft.
- Main Lodge with the following amenities (approximately 28,323 sq. ft.)
  - 5,331 sq. ft. restaurant (~95 seats), bar (~40 seats) and support facilities (kitchen) that would be open to the public and guests of the hotel
  - 429 sq. ft. pool bar
  - 1,679 sq. ft. spa (3 treatment rooms) open to guests and the public
  - 566 sq. ft. fitness center
  - 2,046 sq. ft. conference and banquet space
  - 1,032 sq. ft. lobby/reception
  - 299 sq. ft. gift shop
  - 11,218 sq. ft. partially subterranean parking and valet area
  - Other employee, service, mechanical and restroom spaces
- 4,600 sq. ft. pool deck with a 1,250 sq. ft. pool
- 337 sq. ft. waste/recycling storage
- 24 sq. ft. valet stand at Main Lodge
- 106 sq. ft. entry kiosk on Marre Road (existing access road)
- 167 parking spaces
  - 32 above ground spaces dispersed in pods near cottages
  - 8 spaces in the main lodge within the motor-court
  - 127 below ground spaces using a valet stacking system
    - 43 spaces below Main Lodge using parking lift system
    - 84 spaces partially below ground in 10,209 sq. ft. west parking structure using parking lift system

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- Supporting infrastructure
  - Widening of existing access road from Ana Bay Road (*see Access discussion*)
  - Additional new roads for interior circulation and cottage access
  - New fire hydrants and standpipes
  - Open space & trails
  - Fences, entry gate, and retaining walls
  - Shuttle service
  - Preferred & Original Utility upgrades and extensions to the site (*see Utility Design discussion*)
- On Site & Off-site Signage
- Temporary Events (*see Temporary Events discussion*)

### Operations

“The Cottages” project proposes to operate 50 detached cottages; 45 single and 5 double room cottages. On-site amenities will include a restaurant and bar, swimming pool, small spa, fitness center, conference/ banquet space and gift shop. The hotel would have a 24-hour operation, staffed with a variety of personnel including: reception, entertainment, food service, retail, management, security, housekeeping and maintenance staff. Employees would work in 3-4 shifts, with some workers being part-time. The hotel would provide valet parking services in one of the underground garages and courtesy shuttle service to guests from the site to nearby commercial areas and local beaches.

### Temporary Events

The applicant is requesting to host temporary events of different sizes at the hotel all year round.

- *Small sized events* (30 or fewer guests) are anticipated to make up most of the temporary events at the hotel and will be held at the banquet and conference space. The typical hotel operations will remain open to regular hotel guests. All temporary event parking will be accommodated on site.
- *Medium sized events* (31-100 guests) will also be held at the banquet and conference space. The typical hotel operations will remain open to regular hotel guests. Temporary events exceeding 78 guests will utilize a Transportation Demand Management Plan (TDM), which will include off-site parking and shuttling services. All hotel guest parking will be accommodated onsite.
- *Large sized events* (101-200 guests, including event staff) will require the entire hotel to be booked i.e. a wedding and the restaurant is closed to the public. It is anticipated several event guests will stay at the hotel. All temporary event and hotel guest parking will be accommodated on site.

Temporary events will typically occur at the Main Lodge area, with the pool, spa and gym facilities be available only to guests staying at the hotel. The following table summarizes the temporary events proposed at the hotel.

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Size of Event	Number (guests)	Restaurant Open to Public?	Max No. of events per year	Notes
Large	101-200	No	40	A large private event that requires the entire hotel to be booked. Some event guests may stay at the hotel and some will be just attending. Numbered guests (200) includes event staff. Restaurant will be closed to the public. All parking onsite and no shuttle service provided. Large events will not be scheduled during identified special community events (e.g. Blues Festival). Types: destination wedding, conference, etc.
Medium	31-100	Yes	100-150	Medium events conducted at the banquet space and hosted by local organizations / businesses. Anticipated 2-3 times per week occurrence. Restaurant will remain open to the public. A TDM could be required for events that exceed 78 persons where the restaurant remains in use. Types: smaller wedding, retirement party, community event, awards ceremony, etc.
Small	30 or fewer	Yes	unlimited	Small events where the banquet space is used by persons other than hotel guests e.g. private dinner, smaller community events. Restaurant will remain open to the public.

### Utility Design Options

In 2017, the applicant submitted an initial utility layout (water, sewer, stormwater, drainage) for the proposed project. The initial utility layout is predominantly along Marre Road, which traverses identified cultural sites and is referred as the '**Original Utility**' (Figure A). In order to minimize impacts to cultural resources, the applicant conducted additional site investigations to identify an alternate utility layout, which is hereby referred as '**Preferred Utility**' (Figure B). The *Preferred Utility* layout decreased the subterranean disturbance along Marre Road by rerouting the gas, sewer and power lines off-site to adjacent connections and discharge points. The *Preferred Utility* layout will require obtaining necessary easements from adjacent parcel owners. The *Preferred* and *Original* (initial layout) option for utilities are as follows:

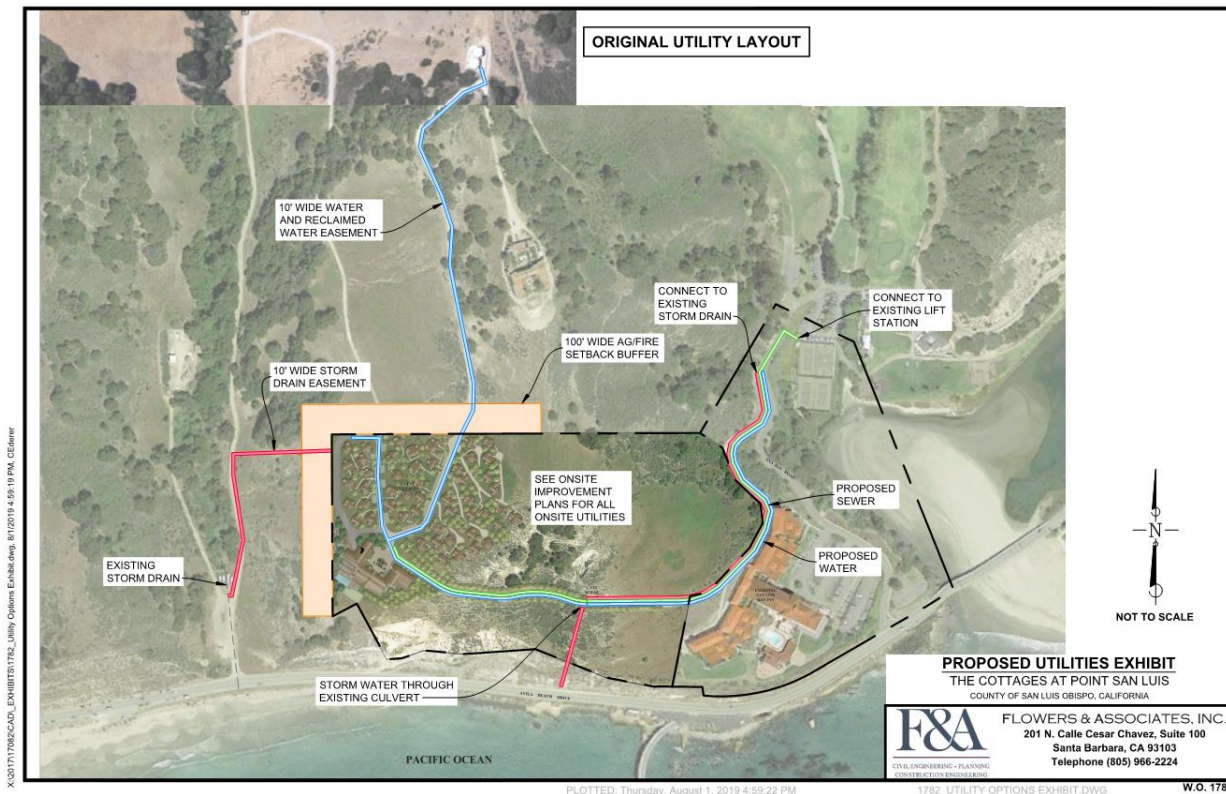
### Original Utility Layout

In the event that some or all of the necessary off-site easements from adjacent landowners are unable to be obtained, the following utility options remain as originally submitted:

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- Water: New water lines will be constructed on the northeast side to extend water from existing tanks up the hill to the site. A future reclaimed water line will be located within the same route. The water line will run along Marre Road and connect to an existing tie-in on Ana Bay Road near the tennis courts. Upgrades to existing water lines near Ana Bay Road and along Marre Road is anticipated. The northeast extension will complete the 'loop' in the water distribution system which is critical to provide for adequate water flow pressure and water quality.
- Sewer will be routed east through Marre Road to an existing main near the golf course.
- Gas will be routed west along Marre Road towards the project.
- Power & telecommunications lines per *Preferred Utility Layout*.
- Stormwater design per *Preferred Utility Layout*.

Figure A. Original Utility Layout



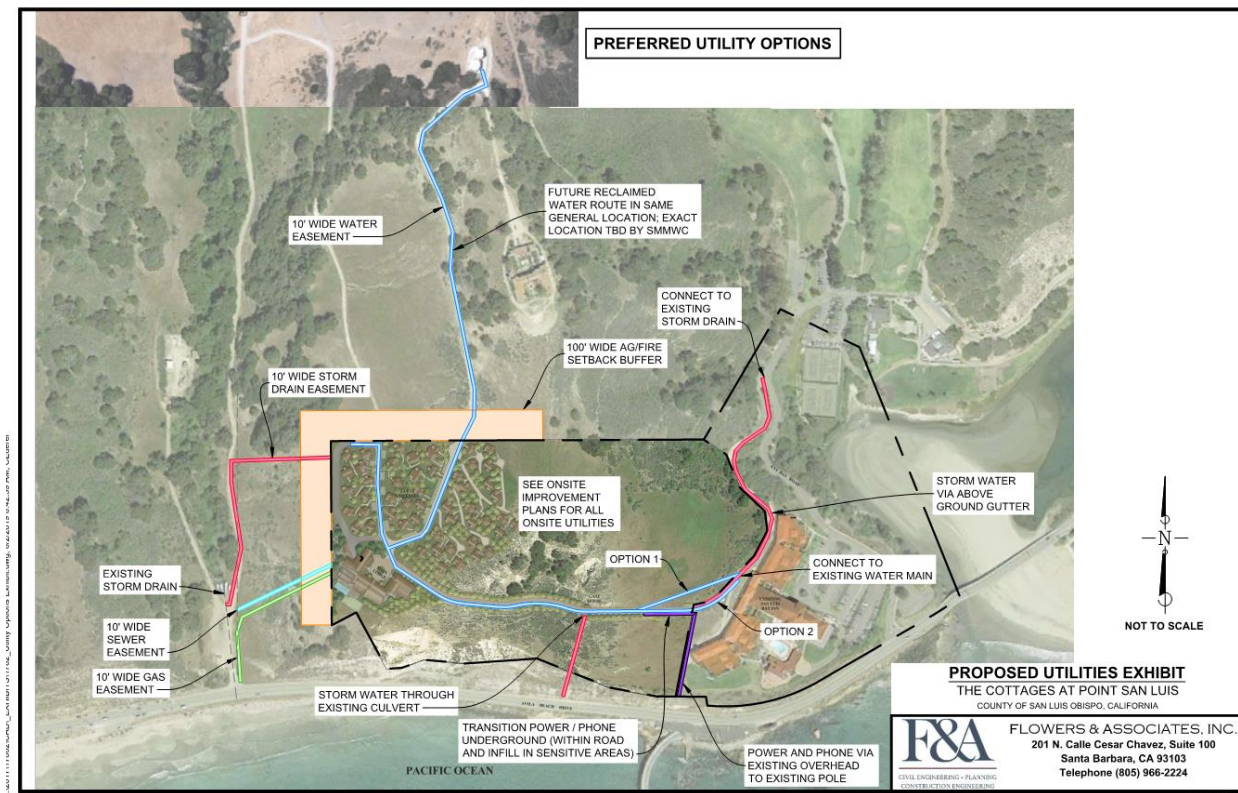
### Preferred Utility Layout

- New water lines will be constructed on the northeast side to extend water from existing tanks up the hill to the site. A future reclaimed water line will be located within the same route. The water line will run along Marre Road and utilize deep horizontal boring into bedrock to avoid sensitive cultural resources (*shown with Option 1 and 2 boring directions*). The new line will tie into an existing water main at the rear of existing San Luis Bay Inn. The 'loop' is still provided by reusing existing water lines along Marre Road and Ana Bay Road. No upgrades to existing off-site pipes are anticipated.

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- Sewer will be routed westward, downslope to an existing sewer main near Wild Cherry Creek Canyon Road.
- Gas will be provided from Avila Beach Drive through Wild Cherry Creek Canyon and routed eastwards towards project site.
- Power & telecommunications overhead lines will be routed from existing lines on Avila Beach Drive to an existing pole on Marre Road (up the cliff face across the Cal Poly Pier). Upgrades to the existing pole or introduction of an additional new pole may be required. On site, the overhead lines will then transition underground into proposed fill along Marre Road. It is anticipated that the lines will be routed through proposed fill and/or bedrock when traversing through the culturally sensitive site
- Stormwater
  - West side: Water will be routed westerly downslope to Wild Cherry Creek via a storm drain.
  - East side: Existing flows will be directed through 1) an existing storm drain culvert to Avila Beach Drive and 2) sheet flow along the driveway into an existing storm drain connection on Ana Bay Road.

Figure B. Preferred Utility Layout



## Access

### 1. Primary Access

Guests, employees and deliveries will access the hotel via Ana Bay Road to a private drive. The private road will be widened and improved as necessary to meet Cal Fire and SLO County Public Works standards. Portions of the access road can be reduced to 20 feet wide, which is the minimum

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width acceptable to Cal Fire/County Fire in order to minimize impacts to sensitive cultural resources on the site.

### 2. Secondary emergency egress

In an emergency, guests and employees will exit the site via the main driveway and proceed north on Ana Bay Road through the golf course and onto Blue Heron Road. Blue Heron Road terminates near the Bob Jones Trail at a gate which leads to Coffeeberry Place. The gate will be opened for egress by hotel staff allowing access to San Luis Bay Drive without crossing a bridge or going through downtown Avila Beach.

### 3. Wild Creek Cherry Canyon

An existing ~16-foot-wide unpaved road links the parcel to Wild Creek Cherry Canyon. There is no intention to use this route as a hotel access. The applicant is considering providing pedestrian access to the beach via a trail to Avila Beach Drive, which will require obtaining an easement from the property owner, currently Pacific Gas & Electric Company.