COUNTY SERVICE AREA 7 (OAK SHORES) WASTEWATER TREATMENT FACILITY UPGRADE PROJECT

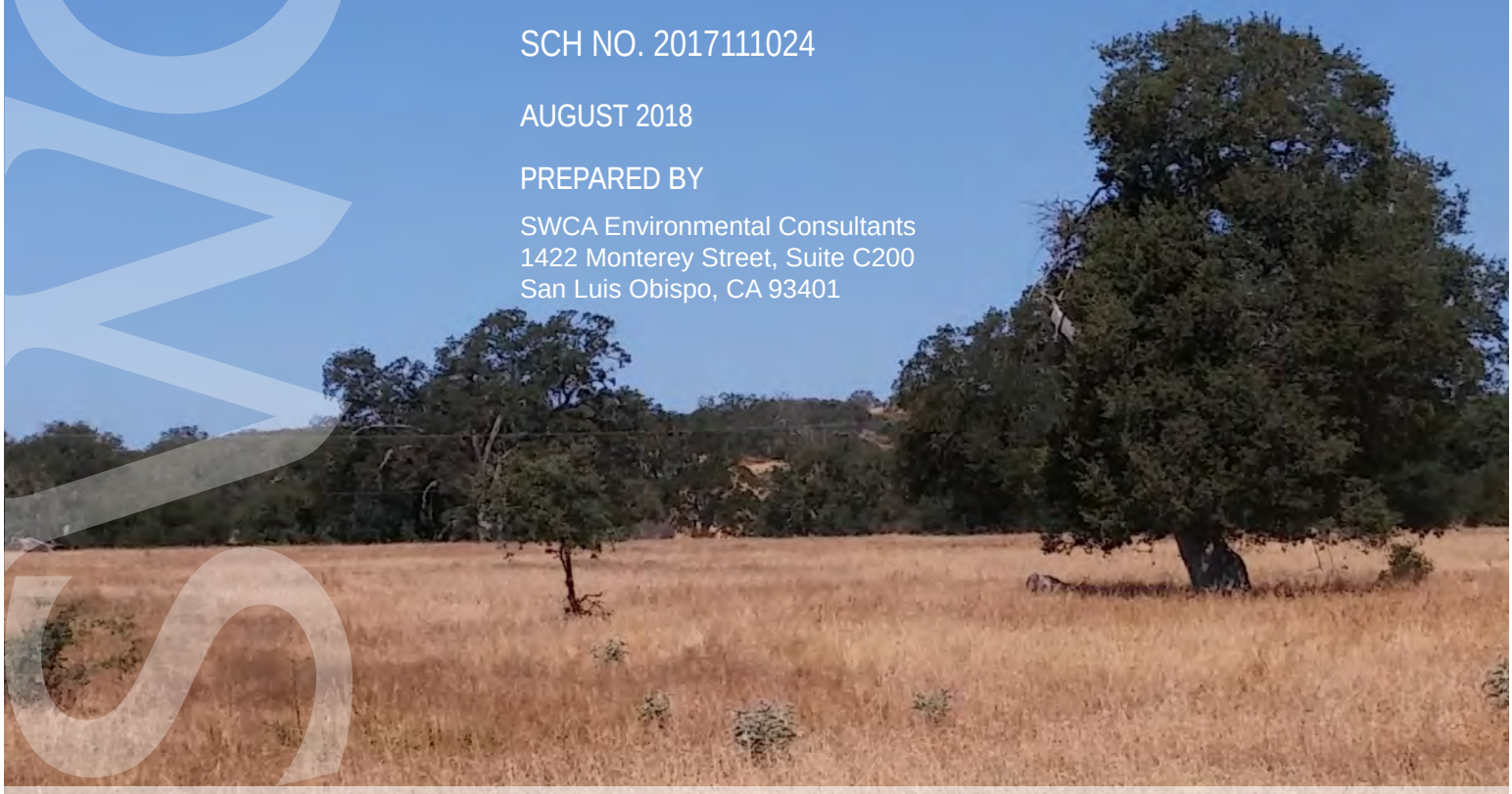
FINAL SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT

SCH NO. 2017111024

AUGUST 2018

PREPARED BY

SWCA Environmental Consultants
1422 Monterey Street, Suite C200
San Luis Obispo, CA 93401



PREPARED FOR

County of San Luis Obispo Public Works Department
976 Osos Street, Room 207
San Luis Obispo, CA 93408

COUNTY SERVICE AREA 7 (OAK SHORES)
WASTEWATER TREATMENT FACILITY UPGRADE PROJECT

FINAL
SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT
SCH NO. 2017111024

Prepared for

County of San Luis Obispo
Public Works Department
976 Osos Street, Room 207
San Luis Obispo, CA 93408
Contact: Keith Miller

Prepared by

SWCA Environmental Consultants
1422 Monterey Street, Suite C200
San Luis Obispo, CA 93401
(805) 543-7095
www.swca.com

SWCA Project No. 33477

August 2018

TABLE OF CONTENTS

Figures

List of Tables

Appendices

Abbreviations and Acronyms

Acronym	Term
AB	Assembly Bill
ACHP	Advisory Council on Historic Preservation
APN	Assessor Parcel Number
BACT	Best Available Control Technology
Basin Plan	Water Quality Control Plan for the Central Coast Region
BLM	Bureau of Land Management
CAA	Clean Air Act
CalEEMod	California Emission Estimator Model
Caltrans	California Department of Transportation
CAMP	Construction Activity Management Plan
CAP	Clean Air Plan
CARB	California Air Resources Board
CCAA	California Clean Air Act
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CDOC	California Department of Conservation
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CFC	chlorofluorocarbon
CFR	Code of Federal Regulations
CH_4	methane
CNDDB	California Natural Diversity Database
CNPS	California Native Plant Society
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
COSE	Conservation and Open Space Element
County	County of San Luis Obispo
CRHR	California Register of Historical Resources
CSA	County Service Area
CWA	Clean Water Act
DPM	diesel particulate matter
EIR	Environmental Impact Report
F_6S	sulfur hexafluoride
FESA	Federal Endangered Species Act
FMMP	Farmland Mapping and Monitoring Program
GHG	greenhouse gas

Acronym	Term
GIS	Geographic Information Systems
gpd	gallons per day
HDPE	high-density polyethylene
HFC	hydrofluorocarbon
IPaC	Information for Planning and Conservation
lbs/day	pounds per day
LCC	land capability classification
LSAA	Lake and Streambed Alteration Agreement
LUCE	Land Use and Circulation Element
LUO	Land Use Ordinance
MBTA	Migratory Bird Treaty Act of 1918
MCV	A Manual of California Vegetation
MLD	most likely descendant
MLRA	Major Land Resource Area
$MTCO_2e$	metric tons of CO_2 equivalent
$MTCO_2e/yr$	metric tons CO_2 per year
N_2O	nitrous oxide
NAHC	California Native American Heritage Commission
NO_2	nitrogen dioxide
NOP	Notice of Preparation
NO_x	nitrogen oxide
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
O_3	ozone
OHWM	ordinary high water mark
PM_{10}	inhalable particulate matter 10 microns or less in size
$PM_{2.5}$	inhalable particulate matter 2.5 microns or less in size
POTW	Publicly Owned Treatment Works
PRC	Public Resources Code
ROG	reactive organic gas
ROWD	Report of Waste Discharge
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SEIR	Supplemental Environmental Impact Report
SLOAPCD	San Luis Obispo County Air Pollution Control District
SO_2	sulfur dioxide
SRA	Sensitive Resource Area
SSC	California Species of Special Concern
SWCA	SWCA Environmental Consultants

Acronym	Term
SWRCB	State Water Resources Control Board
Tri-TAC	Tri-County Technical Advisory Committee
U.S. 101	U.S. Route 101
USACE	U.S. Army Corps of Engineers
USDA	U.S. Department of Agriculture
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
USL	urban services line
VOC	volatile organic compound
VRL	Village Reserve Line
WDR	Waste Discharge Report
WWTP	Wastewater Treatment Plant
WWTF	Wastewater Treatment Facility

This page intentionally left blank.

EXECUTIVE SUMMARY

1. INTRODUCTION AND PURPOSE OF THE SEIR

The County of San Luis Obispo (County), serving as the lead agency under the California Environmental Quality Act of 1970 (CEQA), has prepared this Supplemental Environmental Impact Report (SEIR) to assess the impacts that may result from the approval of the Oak Shores Wastewater Treatment Facility Upgrade Project (project). The applicant for this project is the County of San Luis Obispo Public Works Department. In 2008, the County certified the *Final Environmental Impact Report for the County Service Area 7 (Oak Shores) Wastewater Treatment Plan Upgrade Project* (SWCA Environmental Consultants [SWCA] 2008). Changes to the design and location of the proposed effluent and sludge disposal system were subsequently proposed; therefore, the revised wastewater treatment facility (WWTF) upgrades are being further analyzed in this SEIR. The purpose of this SEIR is to include information necessary to make the previous EIR adequate for the project, as revised. The SEIR and the original EIR will be used by the general public and governmental agencies to review and evaluate the environmental effects associated with the project and the potential mitigation measures recommended to address or minimize those effects.

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

- A brief description of the project location;
- A summary of the project background;
- The project objectives;
- A brief description of the proposed Oak Shores WWTF Upgrade Project;
- A summary of the scoping and Notice of Preparation (NOP) process for the project; and
- A summary of the key impacts and mitigation measures associated with the project.

A comprehensive alternatives analysis for the proposed project was included in the 2008 Oak Shores WWTP Upgrade EIR; therefore, project alternatives are not further analyzed in the SEIR and are not included in this executive summary.

2. PROJECT LOCATION

The proposed project site is located within and adjacent to the Oak Shores Village Area, on the north shore of the Nacimiento Reservoir (Figures ES-1 and ES-2). Surrounding land uses generally include the Nacimiento Reservoir to the south and undeveloped open space, grazing land, and rural lands to the north, east, and west (see Figure ES-2). The proposed Gregg Ranch Disposal Site is located north of Lynch Canyon Road, approximately 0.25 mile west of Interlake Road. The proposed lift station is located at the existing storage ponds and spray field site west of Oak Shores Drive. The proposed 2.0-mile-long force main pipeline would extend from the proposed lift station along the western public right of way of Oak Shores Drive and the northern public right of way of Lynch Canyon Road to the proposed disposal facilities at Gregg Ranch. The existing Oak Shores wastewater treatment plant is located on a 25.42-acre parcel within Oak Shores Village and accessed from Ridge Rider Road.

Figure ES-1. Vicinity map.

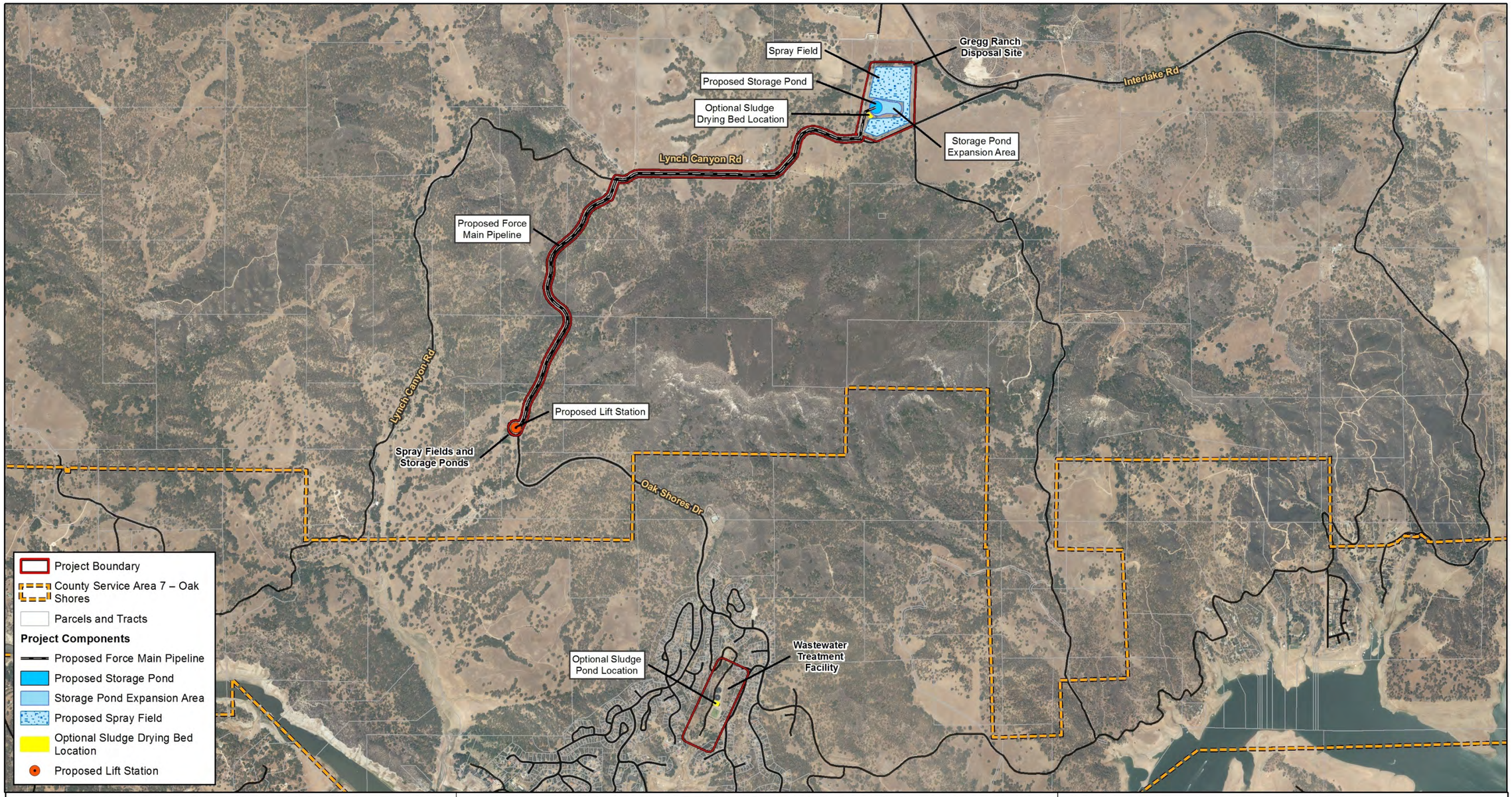


Figure ES-2. Location map.

This page intentionally left blank.

3. PROJECT BACKGROUND

The County Public Works Department currently operates the County Service Area (CSA) 7A (Oak Shores) WWTF. The existing Regional Water Quality Control Board (RWQCB) discharge permit for the WWTF references a build-out population of approximately 850 units and allows a maximum average daily flow of 100,000 gallons per day (gpd), averaged over the month. An effluent pump station at the existing treatment plant currently conveys treated effluent to disposal facilities, including three percolation basins and 1.3 acres of spray fields. In addition, two storage ponds provide temporary storage for use during the rainy season. These existing disposal facilities are located west of Oak Shores Drive approximately 1 mile northwest of Oak Shores Village.

Implementation of the proposed project would increase the capacity of the existing system to meet all current commitments and serve Phases II through VI of approved tentative Tract Map 2162 (285 additional parcels). The proposed project would provide wastewater service capacity for 1,196~~1,197~~ parcels, including 655~~583~~ currently served parcels, 256~~12329~~ parcels with existing commitments, and new commitments for an additional 285 parcels.

To address the additional capacity required for Phases II through VI, the County proposed upgrades and additions to the Oak Shores WWTF in 2008, which included upgrades to the existing treatment plant, additional percolation basins at the existing Kavanaugh percolation basin site, new sludge drying beds adjacent to the existing spray fields, and various sewer collection system improvement alternatives. The project was then analyzed in the 2008 Oak Shores WWTP EIR. Following County Board of Supervisors approval of the 2008 Oak Shores WWTP EIR, a neighboring property owner filed a CEQA challenge, with the intent of compelling an alternative to the proposed expansion of the Kavanaugh percolation ponds. The project was then put on hold.

In 2015, the current owner of Tract 2162 prepared a Wastewater System Capacity Study – Addendum No. 1 to address the specific needs of Phases II through VI of Tract 2162 and identify an alternative disposal site that has sufficient land area, acceptable soil and groundwater conditions, and reasonable proximity to the existing disposal facilities to eliminate the originally proposed expansion of the Kavanaugh percolation ponds and meet the original project objectives. The revised project now under consideration includes all components of the original WWTP Upgrade Project (2008), except that the proposed percolation basins at the Kavanaugh site have been eliminated and replaced with new disposal facilities at Gregg Ranch, and the proposed sludge drying beds to be located at the existing storage pond and spray field location would be moved to a location either within the existing treatment plant or at the Gregg Ranch disposal site. These new or revised facilities have been evaluated in the SEIR.

4. PROJECT OBJECTIVES

The proposed project consists of upgrades to the existing WWTF to meet the following objectives:

- Increase the CSA-7A WWTF system capacity to serve existing commitments and additional approved parcels within Oak Shores Village (Phases II through VI of Oak Shores II [Tract 2162]);
- Upgrade the existing treatment facility to improve efficiency and meet RWQCB requirements;
- Avoid expansion or increased use of the existing disposal facilities at the Kavanaugh percolation basin site; and
- Provide a location for an expanded storage pond that could accommodate future buildout of Oak Shores Village.

5. PROJECT DESCRIPTION

The County Public Works Department proposes improvements to the CSA-7A WWTF in the community of Oak Shores, San Luis Obispo County, California. The County proposes to improve the existing effluent disposal system by constructing a new permanent disposal site at Gregg Ranch, including a 15-acre spray field and 10-acre-foot capacity storage pond (with capacity to expand to a 40-acre-foot capacity storage pond in the future), a 2.0-mile force main pipeline and associated lift station, and new sludge drying beds at either the existing treatment plant or Gregg Ranch.

A. Gregg Ranch Disposal Site

At Gregg Ranch, a new 10-acre-foot high-density polyethylene (HDPE) lined storage pond would be constructed to store treated effluent prior to being discharged on a 15-acre spray field north of Lynch Canyon Road (see Figure ES-2). The storage pond would have expansion capability for a 40-acre-foot capacity storage pond; however, the 10-acre-foot storage pond would accommodate all phases of Tract 2162. The 15-acre spray field will have approximately 100 sprinklers at a height of 3 to 4 feet. The sprinkler heads would be designed to be moveable so that spray can be adjusted periodically. Hours of operation of the sprinklers will vary depending on actual flow to the wastewater treatment system; however, flows will likely be within an 8- to 12-hour workday.

B. Lift Station and Force Main Pipeline

The proposed Gregg Ranch disposal system includes a booster pump (lift) station and 10-inch-diameter force main pipeline that would extend from the existing storage ponds and spray fields approximately 2 miles to the Gregg Ranch property (see Figure ES-2). The proposed force main pipeline would generally be located along the western edge of the public right-of-way on Oak Shores Drive and the northern edge of the public right-of-way on Lynch Canyon Road and would convey treated wastewater to the Gregg Ranch disposal site (see Figure ES-2). The proposed lift station would be located adjacent to the existing storage ponds and spray fields west of Oak Shores Drive (see Figure ES-2).

C. Sludge Drying Beds

The County proposes to construct 5,000 square feet of sludge drying beds either at the proposed Gregg Ranch disposal site or within the existing treatment plant (see Figure ES-2). The sludge drying beds would be approximately 3 feet deep. Construction of the sludge drying beds would result in the disturbance of an 8,500-square-foot area, including 1,000 cubic yards of cut and 100 cubic yards of fill. Approximately 31 tons of dry solids would be generated per year. Dried sludge would be trucked offsite to a County-approved facility (i.e., Cold Canyon Landfill, Engel and Gray composting, or similar facility).

6. SCOPING AND NOTICE OF PREPARATION PROCESS

In compliance with the State CEQA Guidelines, the County has taken steps to provide opportunities to participate in the environmental process. During the Initial Study process, an effort was made to contact various federal, state, regional, and local governmental agencies and other interested parties to solicit comments and inform the public of the proposed project. The County held a project update meeting at the Oak Shores Community Association on October 10, 2017. At the meeting, County staff provided an update on the proposed project as well as challenges with the existing WWTF. In addition, the County distributed the Notice of Preparation (NOP) on November 8, 2017 to various agencies, organizations and interested persons throughout San Luis Obispo County and the surrounding area. The proposed project

was described, the scope of the environmental review was identified, and agencies and the public were invited to review and comment on the NOP. The close of the NOP review period was December 15, 2017.

7. SIGNIFICANT ENVIRONMENTAL IMPACTS IDENTIFIED

Impacts of the proposed project and alternatives have been classified using the categories described below:

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

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

As discussed in Section 1 of the Executive Summary, Purpose of the SEIR, the impacts and mitigation measures identified in the SEIR are associated with components of the project that have been revised since the certification of the 2008 Oak Shores WWTP EIR. The impacts and associated mitigation measures are shown in the Summary of Impacts and Mitigation Measures (Table ES-1). The table includes all identified potentially significant impacts, which are identified with an impact number (e.g., AES Impact 1).

Each issue area section of the impact summary table describes and classifies each identified impact, lists recommended mitigation when applicable, and states the level of residual impact (i.e., impact after implementation of mitigation). A brief summary of the key significant impacts is presented below.

1) **Aesthetic Resources.** Implementation of the proposed project could result in potential impacts to visual resources including creation of an aesthetically incompatible site visible from public roadways, introduction of new uses within a scenic rural agricultural area, and changing the visual character of the area.
2) **Air Quality.** Implementation of the proposed project could result in potential impacts to air quality including short-term exposure of sensitive receptors to substantial air pollutant concentrations and creation of objectionable odors.

3) **Biological Resources.** Implementation of the proposed project could result in potential impacts to biological resources, including having a substantial effect, either directly or through habitat modification, on special status animal species, having a substantial adverse effect on riparian habitat, jurisdictional features, or other sensitive natural community identified in local or regional plans, policies or regulations by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS), interfering 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 use of native wildlife nursery sites, or conflicting with local policies or ordinances protecting biological resources.

4) **Cultural Resources**. Implementation of the proposed project could result in potential impacts to cultural resources, including displacement and destruction of unknown, subsurface, archeological resources, disturbance or destruction of unknown, subsurface human remains, or uncovering and disturbance of previously unknown paleontological resources.

5) **Land Use**. Implementation of the proposed project could result in a land use that is potentially incompatible with surrounding adjacent land uses.

Table ES-1. Summary of Impacts and Mitigation Measures

Impact	Mitigation Measure(s)	Residual Impacts
Aesthetics		
AES Impact 1: Proposed development could create an aesthetically incompatible site visible from public roadways, resulting in a potentially significant, long-term impact. *(Class II, less than significant with mitigation)*	**AES/mm-1.1:** Prior to approval of improvement plans, the applicant shall redesign the footprint of the proposed Gregg Ranch disposal site to retain mature oaks and vegetation between Lynch Canyon Road and the visual screening line shown in Figure 4.1-9. The spray field, storage pond, and sludge drying bed location shall be relocated outside of the visual screening area. Construction of the force main pipeline shall be sited to avoid removal of mature trees and vegetation in the visual screening area. The redesigned disposal site shall be shown on all applicable project plans prior to construction. **AES/mm-1.2:** Prior to approval of improvement plans, any proposed fencing and signage at the Gregg Ranch disposal site shall be clearly shown on project plans, including the proposed location and style of fencing and signs. Fencing type shall be the same as that currently utilized at the existing spray field and storage pond location (barbed wire with steel T-post and/or wooden supports) or another fencing type that is consistent with the rural setting (i.e., similar to fences and gates in areas surrounding Gregg Ranch). Signage shall be the minimum amount and size required for safety purposes. The redesigned disposal site shall be shown on all applicable project plans prior to construction.	Less than significant with mitigation *(Class II)*
AES Impact 2: Proposed development would introduce new uses within a scenic rural agricultural area, resulting in a potentially significant, long-term impact. *(Class II, less than significant with mitigation)*	Implement mitigation measures **AES/mm-1.1** and **AES/mm-1.2**.	Less than significant with mitigation *(Class II)*
AES Impact 3: The proposed Gregg Ranch disposal site would change the visual character of the area resulting in a potentially significant, long-term impact. *(Class II, less than significant with mitigation)*	**AES/mm-3.1:** Prior to approval of improvement plans, any proposed earthen berms at the Gregg Ranch disposal site shall be clearly shown on project plans, including the proposed location, size, height, and design of each berm. Proposed berms shall be designed to match the natural landscape and shall not include angular (squared) edges or corners. The exterior slopes of proposed earthen berms shall be revegetated to match surrounding areas. The location and type of earthen berms shall be shown on all applicable project plans prior to construction.	Less than significant with mitigation *(Class II)*
Air Quality		
AQ Impact 1: Proposed development could expose sensitive receptors to substantial air pollutant concentrations *(Class II, less than significant with mitigation).*	**AQ/mm-1.1:** All surfaces and materials shall be managed to ensure that fugitive dust emissions are adequately controlled to below the 20% opacity limit, identified in the SLOAPCD's Rule 401, Visible Emissions, and to ensure that dust is not emitted offsite. This applies to surfaces that will be graded, that are currently being graded, or that have been graded, and to all materials, whether filled, excavated, transported, or stockpiled. The following fugitive dust control measures shall be implemented: a. Reduce the amount of the disturbed area where possible; b. Use water trucks or sprinkler systems in sufficient quantities to prevent airborne dust from leaving the site. Increased watering frequency shall be required whenever wind speeds exceed 15 miles per hour. Reclaimed (non-potable) water shall be used whenever possible;	Less than significant with mitigation *(Class II)*

Impact	Mitigation Measure(s)	Residual Impacts

c. Since water use is a concern due to drought conditions, the contractor shall have the option to implement the use of a SLOAPCD-approved dust suppressant(s) as a potential alternative to reduce the amount of water used for fugitive dust control. For a list of dust suppressants, see Section 4.3 of the CEQA Air Quality Handbook, available at: http://slocleanair.org/business/landusecega.php.

~~c.~~ d. All dirt stockpile areas shall be sprayed daily as needed; and

~~d.~~ e. All roadways, driveways, sidewalks, etc. to be paved shall be completed as soon as possible, and building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.

AQ/mm-1.2: The applicant shall implement the following mitigation measures to minimize nuisance impacts and to significantly reduce fugitive dust emissions:

a. Permanent dust control measures identified in the approved project plans shall be implemented as soon as possible following completion of any soil disturbing activities;

b. Exposed ground areas that are planned to be reworked at dates greater than one month after initial grading shall be sown with a fast germinating native grass seed and watered until vegetation is established;

c. All disturbed soil areas not subject to revegetation shall be stabilized using approved chemical soil binders, jute netting, or other methods approved in advance by the SLOAPCD;

d. Vehicle speed for all construction vehicles shall not exceed 15 miles per hour on any unpaved surface at the construction site;

e. All trucks hauling dirt, sand, soil, or other loose materials are to be covered or shall maintain at least two feet of freeboard (minimum vertical distance between top of load and top of trailer) in accordance with California Vehicle Code Section 23114;

f. Install wheel washers where vehicles enter and exit unpaved roads onto streets, or wash off trucks and equipment leaving the site; and

g. Sweep streets at the end of each day if visible soil material is carried onto adjacent paved roads. Water sweepers with reclaimed water shall be used where feasible.

AQ/mm-1.3: For areas within 1,000 feet of residences, the following additional measures shall apply to the greatest extent feasible:

1. California Diesel Idling Regulations

   a. On-road diesel vehicles shall comply with Section 2485 of Title 13 of the California Code of Regulations. This regulation limits idling from diesel-fueled commercial motor vehicles with gross vehicular weight ratings of more than 10,000 pounds and licensed for operation on highways. It applies to California and non-California based vehicles. In general, the regulation specifies that drivers of said vehicles:

      i. Shall not idle the vehicles primary diesel engine for greater than 5 minutes at any location, except as noted in Subsection (d) of the regulation; and

      ii. Shall not operate a diesel-fueled auxiliary power system (APS) to power a heater, air conditioner, or any ancillary equipment on that vehicle during sleeping or resting in a sleeper berth for greater than 5 minutes at any location when within 1,000 feet of a restricted area, except as noted in

Impact	Mitigation Measure(s)	Residual Impacts

Subsection (d) of the regulation.

b. Off-road diesel equipment shall comply with the 5-minute idling restriction identified in Section 2449(d)(2) of the CARB's In-Use Off-Road Diesel regulation.

c. Signs must be posted in the designated queuing areas and job sites to remind drivers and operators of the state's 5-minute idling limit.

d. The specific requirements and exceptions in the regulations can be reviewed at the following websites: www.arb.ca.gov/msprog/truck-idling/factsheet.pdf and www.arb.ca.gov/regact/2007/ordiesl07/frooal.pdf.

2. Diesel Idling Restrictions Near Sensitive Receptors. In addition to the state required diesel idling requirements, the project applicant shall comply with these more restrictive requirements to minimize impacts to nearby sensitive receptors:

a. Staging and queuing areas shall not be located within 1,000 feet of sensitive receptors to the greatest extent feasible;

b. Diesel idling within 1,000 feet of sensitive receptors shall not be permitted to the greatest extent feasible;

c. Use of alternative fueled equipment is recommended; and

d. Signs that specify the no idling areas must be posted and enforced at the site.

~~1.~~3. Truck Routing. Proposed truck routes should be evaluated and selected to ensure routing patters have the least impact to residential dwellings and other sensitive receptors, such as schools, parks, day care centers, nursing homes, and hospitals.

AQ/mm-1.4: Prior to construction, the applicant shall obtain California statewide portable equipment registrations or a SLOAPCD permit for any portable construction equipment or engine with 50 horsepower or greater to be used for project construction.

AQ/mm-1.5: Demolition/Asbestos. Demolition activities can have potential negative air quality impacts, including issues surrounding proper handling, abatement, and disposal of asbestos containing material (ACM). Asbestos containing materials could be encountered during the demolition or remodeling of existing structures or the disturbance, demolition, or relocation of above or below ground utility pipes/pipelines (e.g., transite pipes or insulation on pipes). If this project will include any of these activities, then it may be subject to various regulatory jurisdictions, including the requirements stipulated in the National Emission Standard for Hazardous Air Pollutants (40 CFR 61, Subpart M – asbestos NESHAP). These requirements include but are not limited to: 1) written notification, within at least 10 business days of activities commencing, to the SLOAPCD, 2) asbestos survey conducted by a Certified Asbestos Consultant, and 3) applicable removal and disposal requirements of identified ACM. Please contact the SLOAPCD Engineering & Compliance Division at (805) 781-5912 or go to http://slocleanair.org/rules-regulations/asbestos.php for further information. To obtain a Notification of Demolition and Renovation form go to the "Other Forms" section of http://slocleanair.org/library/download-forms.php.

Impact	Mitigation Measure(s)	Residual Impacts
AQ Impact 2: The proposed project could generate and expose people to objectionable odors *(Class II, less than significant with mitigation).*	**AQ/mm-2.1:** Prior to issuance of construction permits, the County shall submit an Odor Control Plan to the SLOAPCD for review and approval. This plan shall identify and describe potential odor sources, describe sludge handling procedures, and include odor control strategies, including implementation of the nitrate reduction treatment process and staff maintenance check and monitoring schedules. The plan shall identify the contact information for an appropriate person at the County and SLOAPCD who shall be responsible for receiving and managing odor complaints. The plan shall identify options for reducing odor in the event of a complaint. **AQ/mm-2.2:** Prior to approval of the improvements plans, the applicant shall show the proposed sludge drying beds at the existing Oak Shores WWTF on Ridge Rider Road and not at the Gregg Ranch Disposal Site. The sludge drying beds shall be lined and shall include a drainage system that allows for the collection of leachate for further treatment, if necessary. The selected sludge drying bed location shall be shown on all applicable project plans prior to construction. **AQ/mm-2.3:** Prior to approval of the improvement plans, the applicant shall design the effluent discharge system to minimize the potential for offsite drift. The use of sprinklers or misters that exceed the height of the surrounding berm and that would allow for effluent to drift offsite shall be prohibited.	Less than significant with mitigation *(Class II)*
Biological Resources		
BIO Impact 1: Implementation of the proposed project could have a substantial adverse effect, either directly or through habitat modification, on special-status animal species *(Class II, less than significant with mitigation)*.	**BIO/mm-1.1:** Prior to initiation of any site preparation/construction activities, the County shall implement the following: a. A County-approved biologist shall conduct a preconstruction survey of the project area no more than 30 days and no less than 14 days prior to the commencement of ground disturbance in previously undisturbed areas of the project site. If any evidence of occupation of that portion of the project site by listed or other special-status plant or animal species is observed, a buffer shall be established by the qualified biologist that results in sufficient avoidance to comply with applicable regulations. If sufficient avoidance cannot be established, the County shall coordinate with the USFWS and/or the CDFW for further guidance to avoid/minimize potential impacts. Copies of the preconstruction survey and results, as well as all permits and evidence of compliance with applicable regulations, shall be submitted to the County. b. A County-approved biologist shall conduct an education and training session for all construction personnel. At a minimum, the training will include a description of the natural history of the species with the potential to be affected by the proposed project and their habitats. Training will include the general measures that are being implemented to conserve these species as they relate to the proposed project, the penalties for non-compliance, and the boundaries of the work area within which the project must be accomplished. To ensure that employees and contractors understand their roles and responsibilities, training may have to be conducted in languages other than English. c. Because of the potential for impacts to coast horned lizard (observed in scrub habitat within the project site in 2016) and nesting birds, a County-approved biologist shall monitor the removal of trees that could support nesting birds and construction within chaparral/scrub habitats that could support coast horned lizard. Coast horned lizards observed in work areas during monitoring shall be captured and relocated to suitable	Less than significant with mitigation *(Class II)*

Impact	Mitigation Measure(s)	Residual Impacts

habitat outside of work areas to avoid injury or mortality. Any proposal for capture and relocation of coast horned lizards shall be coordinated with CDFW prior to construction to ensure these efforts are in compliance with the State of California Fish and Game Code.

BIO/mm-1.2: Prior to and during any site preparation and/or construction activities associated with the proposed project, the County shall ensure the following general protective measures are implemented:

a. Should a special-status species or avian species protected under the MBTA, or their dens/burrows/nests, be discovered within the project boundary, the following shall occur:
    i. All work within 100 feet of the discovery shall cease immediately.
    ii. The Resident Engineer or their onsite designee shall be immediately notified.
    iii. A qualified biologist shall determine if notification and/or consultation with regulatory agencies is required, and how to proceed with the project and avoid take.

b. Project employees will be directed to exercise caution when commuting within the project area. A 15-mile-per-hour speed limit will be enforced on unpaved roads.

c. Project employees will be provided with written guidance governing vehicle use, speed limits on unpaved roads, fire prevention, and other hazards.

d. A litter control program shall be instituted at the project site. All workers shall ensure their food scraps, paper wrappers, food containers, cans, bottles, and other trash from the project area are deposited in covered or closed trash containers. The trash containers shall be removed from the project area at the end of each working day.

e. No canine or feline pets or firearms (except for federal, state, or local law enforcement officers and security personnel) shall be permitted on construction sites to avoid harassment, killing, or injuring of listed species.

f. All construction activities shall be confined within the project construction area, as identified on the final construction plans. At no time shall equipment or personnel be allowed to adversely affect areas outside the project site.

g. All excavated, steep-walled holes or trenches more than 2 feet deep shall be covered at the close of each working day by plywood or similar materials. If the trenches cannot be closed, one or more escape ramps constructed of earthen-fill or wooden planks shall be installed no greater than 200 feet apart. Before such holes or trenches are filled, they shall be thoroughly inspected for trapped special-status species which were identified during the project's education session.

h. All pipes and culverts shall be searched for species identified during the project's education session prior to being moved or sealed. Should any special-status species be discovered within a pipe or culvert, that section of pipe or culvert shall not be moved or sealed. Any special-status species found in a pipe or culvert shall be allowed to vacate unimpeded.

i. Tightly woven fiber netting or similar material shall be used for erosion control or other purposes at the project site to ensure that special-status species do not get trapped. This limitation will be communicated to the contractor through use of Special Provisions included in the bid solicitation package.

Impact	Mitigation Measure(s)	Residual Impacts
	j. Use of rodenticides and herbicides at the project site shall be prohibited to prevent primary or secondary poisoning of special-status species and depletion of prey populations on which they depend. **BIO/mm-1.3:** To protect special-status avian species and those species protected by the MBTA and California Fish and Game Code Section 3503, including bald and golden eagles, which are known to exist in the project vicinity and may start nesting earlier than other species, vegetation clearing and earth disturbance should be avoided from January 1 to September 1. If avoiding construction during this season is not feasible, a qualified biologist shall survey the area within 1 week prior to activity beginning onsite. If nesting birds are located on or near the proposed project site, they shall be avoided until they have successfully fledged. A buffer zone of 50 feet will be placed around all nonsensitive, passerine bird species, and a 250-foot buffer will be implemented for raptor species, and all activity will remain outside of that buffer until the qualified biologist, has determined that the young have fledged. Buffer reductions and/or work within non-disturbance buffer areas can be completed only with approval from relevant resource agencies. If nesting bald or golden eagles are detected during surveys, applicable resource agencies will be consulted for guidance. **BIO/mm-1.4:** Prior to and during any site preparation and/or construction activities associated with the proposed project, the County shall ensure the following protective measures are implemented to avoid impacts to roosting bats: a. Prior to commencement of tree removal associated with construction, the County will schedule tree removal to occur outside of the typical bat maternity roosting and pupping season if possible to avoid potential impacts to bats. The typical bat maternal roosting season is defined as occurring from February 1 to August 31; therefore, tree removal activities should be scheduled to occur from September 1 to February 14, if possible. b. Prior to commencement of tree removal associated with construction, if tree removal must occur during the typical bat maternity roosting season (February 1 to September 1), tree-removal activities will not be allowed unless a County-approved, qualified biologist has surveyed the impact area within 14 days prior to commencement of proposed construction activities and determined that no roosting bats will be adversely impacted. Roosting bat surveys will only be considered valid for 14 consecutive days before they will need to be repeated. At such time, if any evidence of bat roosting is found, the biologist will determine if any construction activities can occur during roosting and to what extent. The results of the surveys will be submitted to the County Environmental Coordinator and the CDFW, possibly with recommendations for variable buffer zones, as needed, around individual roosting sites. Based on the results of the surveys, the County shall implement the following: i. If no bat roosting activities are detected within the proposed work area, tree-removal and noise-producing construction activities may proceed and no further mitigation is required. ii. If bat roosting activity is confirmed during preconstruction roost surveys or at any time during the monitoring of construction activities, at a minimum, work activities will be avoided within 100 feet of active roosts until bats have left the roosts. No trees with active bat roosts may be removed until they have left the roosts or have been excluded from roosts. c. Prior to commencement of tree removal associated with construction, if bats would be removed from roosts, the County will prepare a Bat Exclusion Plan to exclude the	

Impact	Mitigation Measure(s)	Residual Impacts
	species from trees scheduled for removal. To reduce impacts to roosting bats, this plan will discuss methods of eliminating bat access to the identified roosting habitat prior to construction so that bats are not able to return to and occupy the roost. The appropriate timing for exclusion implementation will be determined based upon the species identified as occurring within the project site. Roost areas will be surveyed by a qualified biologist prior to implementing exclusion methods to ensure that no bats become trapped. Exclusion methods may include, but are not limited to, wire mesh, spray foam, or fabric placement. This plan will be submitted to the CDFW for regulatory approval. d. Following construction, if the County-approved biologist determined that roosting bats used any removed trees at any time for roosting prior to removal, features to enhance bat habitat will be incorporated into the project. Appropriate habitat enhancement features could include the installation of bat boxes on remaining trees to enhance bat night, day and nursery roosting habitat. The design and style of the bat boxes will be appropriate to the species identified utilizing the trees that were removed. **BIO/mm-1.5:** Prior to and during any site preparation and/or construction activities associated with the proposed project, the County shall ensure the following protective measure is implemented to avoid impacts to Monterey dusky-footed woodrat: a. Prior to commencement of tree removal associated with construction, a County-approved, qualified biologist will survey trees scheduled for removal for woodrat nests. Based on the results of the surveys, the County shall implement the following: i. If no woodrat nests are observed then grading and ground disturbance activities may proceed and no further mitigation is required. ii. If woodrat nests are observed within the project area, the results of the surveys will be submitted to the CDFW, with recommendations for variable buffer zones, as needed, around individual nests and/or relocation of nests and woodrats, if approved by the CDFW. **BIO/mm-1.6:** Prior to and during any site preparation and/or construction activities associated with the proposed project, the County shall ensure the following protective measure is implemented to avoid impacts to American badger: a. Prior to commencement of grading and other ground disturbance activities, a County-approved, qualified biologist will survey the footprint of construction areas for active badger dens. Based on the results of the surveys, the County shall implement the following: i. If no active badger dens are observed, grading and ground disturbance activities may proceed and no further mitigation is required. ii. If presence of active badger dens is confirmed during preconstruction surveys or at any time during the monitoring of construction activities, work activities will be avoided within 100 feet of active badger dens. Alternatively, the County Public Works Department may coordinate with the CDFW to determine if badger exclusion or relocation measures are appropriate.	
BIO Impact 2: Implementation of the proposed project could have a substantial adverse effect on riparian habitat, jurisdictional features, or other sensitive natural community identified in local or regional plans, policies,	**BIO/mm-2.1:** The limits of grading shall be shown on final improvement/construction plans prior to site disturbance. All new construction, site disturbance, and vegetation removal shall be located within the delineated construction boundaries. The storage of equipment and materials, and temporary stockpiling of soil shall be located within designated areas only, and outside of oak	Less than significant with mitigation *(Class II)*

Impact	Mitigation Measure(s)	Residual Impacts
or regulations or by the CDFW or USFWS *(Class II, less than significant with mitigation)*.	woodland habitat and drainages. Construction/improvement plans shall include grading and drainage, as well as erosion and sedimentation control plans. **BIO/mm-2.2:** Prior to and during any site preparation and/or construction activities associated with the proposed project, the County shall ensure compliance with the following measures to avoid and/or minimize project impacts to potentially jurisdictional waters: a. Prior to disturbance within jurisdictional areas, the County shall obtain a Section 404 Permit from the USACE, a Section 401 Water Quality Certification from the RWQCB, and a Section 1602 Streambed Alteration Agreement from the CDFW for project-related impacts that will occur in areas under the jurisdiction of these regulatory agencies. b. Prior to initiation of any site preparation and/or construction activities, a Storm Water Pollution Prevention Plan for the project will be prepared. Provisions of this plan shall be implemented during and after construction, as necessary, to avoid and minimize erosion and stormwater pollution in and near the work area. c. Prior to any ground-disturbing activities, the County shall ensure jurisdictional waters are delineated with flagging or exclusionary fencing and construction activities will minimize impacts to jurisdictional waters. Since impacts to jurisdictional waters are anticipated to be temporary, these areas will be restored at a 1:1 ratio to approximate their pre-construction condition. d. During construction, erosion control measures shall be implemented. Silt fencing, fiber rolls, and barriers shall be installed as needed between the project site and jurisdictional waters to be avoided. At a minimum, erosion controls shall be maintained by the contractor on a daily basis throughout the construction period. e. During construction, the cleaning and refueling of equipment and vehicles shall occur only within designated staging areas and at least 100 feet from jurisdictional waters. f. Stream contours shall be restored as close as possible to their original condition. **BIO/mm-2.3:** Prior to initiation of any site preparation and/or construction activities, the County shall ensure all known communities of purple needlegrass grassland located within the project site are delineated with flagging or exclusionary fencing to identify these areas as environmentally sensitive areas (ESAs). If possible, construction activities will avoid all ground disturbing activities within the delineated ESAs to avoid any impacts to this community. If construction activities cannot be avoided within these ESAs, areas with purple needlegrass temporarily impacted as a result of construction will be replanted/restored with purple needlegrass at a 1:1 ratio (anticipated to be 0.2-acre total). To guarantee the success of the purple needlegrass restoration, the County will monitor until replanted purple needlegrass is successfully established (i.e., has been restored to existing conditions). Additional monitoring will be necessary if initially-required vegetation is not considered successfully established. **BIO/mm-2.4:** In addition to implementation of mitigation measure AES/mm-1.1, prior to, during, and following implementation of construction activities, the County shall implement the following measures to avoid and/or minimize project impacts to oak trees: a. Prior to issuance of permits, the applicant shall redesign the footprint of the permanent project components, including the spray fields, storage and sludge ponds, and pipelines to retain existing mature oaks and vegetation to the maximum extent feasible (see Figure 4.4-6). b. The redesigned disposal site shall be shown on all improvement/construction plans and shall be submitted to the County of San Luis Obispo Department of Planning and	

Impact	Mitigation Measure(s)	Residual Impacts
	Building for approval prior to construction. c. Upon development of final construction plans and prior to site disturbance, construction plans will clearly delineate all trees within 50 feet of the proposed project limits, and will show which trees are to be removed or impacted, and which trees are to remain unharmed. Tree removal shall only be allowed immediately prior to the construction of proposed project components. Trees to remain, either permanently or temporarily during the construction of proposed upgrades, shall be protected to prevent unnecessary tree removal. d. Upon development of final construction plans and prior to site disturbance, the County will organize all mitigation measures applicable to oak trees and oak woodland habitat requirements into a single Oak Tree Mitigation Plan to ensure coordination of all oak tree related measures. A copy of this plan will be included in the project's special provisions. In addition to other adopted mitigation measures, this plan will incorporate the following measures: i. All oak trees identified to remain, either permanently or temporarily during improvements, will not be removed. Removal activities will be conducted in a manner to minimize effects to surrounding oak woodland to remain. ii. Removed trees will be replaced in-kind at a 4:1 ratio and trees impacted but not removed will be mitigated in-kind at a 2:1 ratio. Replanting will be completed as soon as it is feasible (e.g. irrigation water is available and grading activities are complete in proposed replanting areas). Replant areas will be located either in native topsoil or areas where native topsoil has been reapplied. If located in areas where native topsoil has been reapplied, topsoil will be carefully removed and stockpiled for spreading over graded areas to be replanted. The layer of reapplied topsoil shall be a minimum of 6 to 12 inches deep. iii. Seed stock will be collected on-site or in the immediately surrounding area. iv. Location of newly planted trees and/or vegetation/seeds should adhere to the following, whenever possible: on the north side of and at the canopy/dripline edge of existing mature native trees; on north-facing slopes; within drainage swales (except when riparian habitat present); where topsoil is present; and away from continuously wet areas (e.g. lawns, leach lines). v. Newly planted trees will be maintained until successfully established. This will include protection (e.g. tree shelters, exclusionary fencing) from animals (e.g., deer, rodents), regular weeding (minimum of once during early Fall and once during early Spring) of at least a 3-foot radius surrounding the tree/plant and adequate watering (e.g., drip-irrigation system). Watering should be controlled so only enough is used to initially establish the tree/plant, gradually reducing to zero water over a 3-year period. If possible, planting during the warmest, driest months (June through September) will be avoided. In addition, standard planting procedures (e.g., planting tablets, initial deep watering) will be used. vi. Following planting of replacement oak trees, to guarantee the success of the new trees, the County will monitor the new trees' survivability and vigor until the trees are successfully established and prepare monitoring reports on an annual basis for a minimum of 7 years. The first monitoring report shall be submitted to the County Environmental Coordinator 1 year after the	

Impact	Mitigation Measure(s)	Residual Impacts
	completion of replacement planting and thereafter on an annual basis until the monitor, in consultation with the County, has determined that the initially-required vegetation is successfully established. Additional monitoring will be necessary if initially-required vegetation is not considered successfully established. Success criteria for revegetation is 80% survivability within 5 years upon initial planting efforts. vii. The County will maintain compliance with the following measures related to weed removal around newly planted vegetation: 1) no herbicides will be used; and 2) either installation of a securely staked "weed mat" (covering at least a 3-foot radius from center of plant), or hand-removal of weeds (covering at least a three-foot radius from center of plant) will be completed for each new plant (hand-removal weeding will be maintained on a regular basis [at least once in late spring (April) and once in early winter (December)] until plant is 3 feet tall or for 7 years, whichever occurs first. Use of weed-free mulch (at least 3 inches deep) with regular replenishment may be substituted for the weed mat. e. Prior to initiation of construction activities, all trees to remain onsite that are within 50 feet of construction or grading activities will be marked for protection (e.g., with flagging) and their root zone fenced. The outer edge of the tree root zone is 1.5 times the distance from the trunk to the drip line of the tree. Grading, utility trenching, compaction of soil, or placement of fill will be avoided within these fenced areas. If grading in the root zone cannot be avoided, retaining walls may be constructed to minimize cut and fill impacts. Care will be taken to avoid surface roots within the top 18 inches of soil. If any roots must be removed or exposed, they will be cleanly cut and not left exposed above the ground surface. f. Prior to initiation of construction activities, the County will ensure that a qualified biologist verify that oak tree protection measures and purple needlegrass grassland protection measures (as described in BIO/mm-2.4) are correctly implemented. g. All oak trees identified to remain will not be removed. Unless previously approved by the County, the following activities are not allowed within the root zone of existing or newly planted oak trees: year-round irrigation (no summer watering, unless "establishing" new tree or native compatible plant(s) for up to 3 years); grading (includes cutting and filling of material); compaction (e.g., regular use of vehicles); placement of impermeable surfaces (e.g., pavement); disturbance of soil that impacts roots (e.g., tilling). h. If trimming is necessary, the County will retain a County-approved, certified arborist, or apply accepted arborist's techniques, when removing limbs. Unless a hazardous or unsafe situation exists, trimming will be done only during the winter for deciduous species. Smaller trees (smaller than 5 inches in diameter at 4 feet above the ground) within the project area are considered to be of high importance and, when possible, will be given similar consideration as larger trees.	
BIO Impact 3: Implementation of the proposed project could 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	Implement mitigation measures **BIO/mm-1.1 through BIO/mm-1.6**.	Less than significant with mitigation *(Class II)*

Impact	Mitigation Measure(s)	Residual Impacts
sites *(Class II, less than significant with mitigation)*.		
BIO Impact 4: Implementation of the proposed project could conflict with local policies or ordinances protecting biological resources *(Class II, less than significant with mitigation)*.	Implement mitigation measures **BIO/mm-1.1 through BIO/mm-2.4**.	Less than significant with mitigation *(Class II)*
BIO Impact 5: Implementation of the proposed project could contribute to cumulative impacts to biological resources *(Class II, less than significant with mitigation)*.	Implement mitigation measures **BIO/mm-1.1 through BIO/mm-2.4**.	Less than significant with mitigation *(Class II)*
Cultural Resources		
CR Impact 1: Implementation of the proposed project may result in the displacement and destruction of unknown, subsurface, archaeological resources *(Class II, less than significant with mitigation)*.	**CR/mm-1.1:** Prior to construction activities, the applicant shall have a County-qualified archaeologist conduct a cultural resource awareness training for all construction personnel including the following: a. Review the types of archaeological artifacts that may be uncovered; b. Provide examples of common archaeological artifacts to examine; c. Review what makes an archaeological resource significant to archaeologists and local native Americans; d. Describe procedures for notifying involved or interested parties in case of a new discovery; e. Describe reporting requirements and responsibilities of construction personnel; f. Review procedures that shall be used to record, evaluate, and mitigate new discoveries; and g. Describe procedures that would be followed in the case of discovery of disturbed as well as intact human burials and burial-associated artifacts. **CR/mm-1.2:** Prior to project implementation, the Applicant shall prepare an Archaeological Monitoring Plan (AMP). The AMP shall include (but not be limited to) the following: a. A list of personnel involved in the monitoring activities; b. Description of Native American involvement; c. Description of how the monitoring shall occur; d. Description of frequency of monitoring (e.g., full time, part time, spot checking); e. Description of what resources are expected to be encountered; f. Description of circumstances that would result in the halting of work at the project site; g. Description of procedures for halting work on the site and notification procedures; h. Description of monitoring reporting procedures; and, i. Provide specific, detailed protocols for what to do in the event of the discovery of human remains. **CR/mm-1.3:** An archaeological and Native American monitor shall be present during project related ground disturbing activities that have the potential to encounter previously unidentified archaeological resources, as outlined in the AMP prepared to satisfy CR/mm-1.2. Archaeological	Less than significant with mitigation *(Class II)*

Impact	Mitigation Measure(s)	Residual Impacts
	monitoring may cease at any time if the County-qualified archaeologist, in coordination with project's Environmental Coordinator, determine that project activities do not have the potential to encounter and/or disturb unknown resources. **CR/mm-1.4:** In the event that unknown archaeological resources are inadvertently encountered during the project, all ground disturbing activities shall cease, and the County Environmental Coordinator shall be notified so that the extent and location of discovered materials may be recorded by a qualified archaeologist, and disposition of artifacts may be accomplished in accordance with state and federal law.	
CR Impact 2: Implementation of the proposed project may result in the disturbance or destruction of unknown, subsurface human remains *(Class II, less than significant with mitigation)*.	**CR/mm-2.1:** If human remains are exposed during construction, the Applicant shall notify the County Environmental Coordinator immediately and comply with State Health and Safety Code Section 7050.5, which states that no further disturbance shall occur until the County Coroner has been notified and can make the necessary findings as to origin and disposition of the remains pursuant to PRC Section 5097.98. Construction shall halt in the area of the discovery of human remains, the area shall be protected, and consultation and treatment shall occur as prescribed by law.	Less than significant with mitigation *(Class II)*
CR Impact 3: Proposed grading and excavation activities have the potential to uncover and disturb previously unknown paleontological resources, which would result in a potentially significant impact *(Class II, less than significant with mitigation)*.	**CR/mm-3.1:** If any paleontological resources are encountered during ground-disturbing activities, activities in the immediate area of the find shall be halted and the discovery assessed. A qualified paleontologist shall be retained to evaluate the discovery and recommend appropriate treatment options pursuant to guidelines developed by the Society of Vertebrate Paleontology. A paleontological resource impact mitigation program for treatment of the resources shall be developed and implemented if paleontological resources are encountered.	Less than significant with mitigation *(Class II)*
CR Impact 4: Proposed grading and excavation activities have the potential to uncover and disturb previously unknown tribal cultural resources, which would result in a potentially significant impact (*Class II, less than significant with mitigation*).	**Implement CR/mm-1.1 through CR/mm-2.1.**	Less than significant with mitigation *(Class II)*
CR Impact 5: Implementation of the proposed project could contribute to cumulative impacts to cultural resources (*Class II, less than significant with mitigation*).	**Implement CR/mm-1.1 through CR/mm-2.1.**	Less than significant with mitigation *(Class II)*
Land Use and Planning		
LU Impact 1: The proposed Gregg Ranch disposal site would be potentially incompatible with surrounding adjacent land uses, resulting in a potentially significant, long-term impact *(Class II, less than significant with mitigation)*.	Implement mitigation measures **AES/mm-1.1, AES/mm-1.2, AES/mm-3.1, AQ/mm-2.1 through AQ/mm-2.3, and BIO/mm-2.5**. **LU/mm-1:** During the ROWD process the County shall coordinate with the RWQCB to locate, construct and monitor groundwater monitoring wells at the Gregg Ranch, if determined to be necessary by the RWQCB. The wells shall be placed and monitored in such a manner as to provide verification that applicable Central Coast Basin Plan criteria have been met throughout the life of the project. Well monitoring requirements implemented at project start-up, and subsequently, will be at the discretion of the RWQCB.	Less than significant with mitigation *(Class II)*

CHAPTER 1. INTRODUCTION

1.1 PURPOSE OF THE SEIR

In 2008, the County of San Luis Obispo (County), acting as the lead agency under the California Environmental Quality Act (CEQA), certified the *Final Environmental Impact Report for the County Service Area 7 (Oak Shores) Wastewater Treatment Plant Upgrade Project* (Morro Group, Inc. 2008; referred to as the 2008 Oak Shores WWTP EIR). Changes to the design and location of the proposed effluent and sludge disposal system were subsequently proposed; therefore, the revised wastewater treatment facility (WWTF) upgrades are being further analyzed in this Supplemental Environmental Impact Report (SEIR). The purpose of this SEIR is to include information necessary to make the previous EIR adequate for the project, as revised. Therefore, this SEIR only includes information where necessary to reflect changes made to the Oak Shores WWTF Upgrade Project (project), and addresses environmental issue areas that would be potentially affected by implementation of the project in a manner not adequately analyzed in the 2008 EIR.

The current project includes the following changes to the previously approved Oak Shores WWTP Upgrade Project:

- New storage pond and spray field at Gregg Ranch;
- New lift station at existing spray field site and 2.0-mile-long force main pipeline to Gregg Ranch Disposal Site; and
- New sludge drying beds within the existing treatment plant or at Gregg Ranch.

Based on the State CEQA Guidelines, these new project components were determined to be substantial changes to the project that would require major revisions of the previous EIR due to the potential involvement of new significant environmental effects or a substantial increase of previously identified significant effects. The County, serving as the lead agency under CEQA, determined preparation of an SEIR was necessary to address these project revisions.

1.2 SCOPING AND NOTICE OF PREPARATION PROCESS

In compliance with the State CEQA Guidelines, the County has taken steps to provide opportunities to participate in the environmental process. During the Initial Study process, an effort was made to contact various federal, state, regional, and local governmental agencies and other interested parties to solicit comments and inform the public of the proposed project. The County held a project update meeting at the Oak Shores Community Association on October 10, 2017. At the meeting, County staff provided an update on the proposed project as well as challenges with the existing WWTF. In addition, the County distributed the Notice of Preparation (NOP) on November 8, 2017, to various agencies, organizations, and interested persons throughout San Luis Obispo County and the surrounding area. The proposed project was described, the scope of the environmental review was identified, and agencies and the public were invited to review and comment on the NOP. The close of the NOP review period was December 15, 2017.

Eleven responses were received on the NOP, including five from neighboring landowners and six from local or state agencies. Concerns with potential nuisance issues such as odors featured prominently in the responses from landowners, as did concerns with visual impacts and water quality. Odors are discussed in Section 4.3, Air Quality, of the SEIR and visual resources in Section 4.1, Aesthetics. The Initial Study for the project (Appendix A) generally described potential impacts to water resources. Additional information on the regulatory process that ensures compliance with Regional Water Quality Control Board (RWQCB)

Basin requirements are included in Chapter 2, Project Description. A discussion of groundwater and the potential to affect wells in the area is discussed in Section 4.6, Land Use and Planning.

Agencies, organizations, and interested parties not contacted or who did not respond to the request for comments about the project during circulation of the NOP had~~currently have~~ the opportunity to comment during the 45-day public review period on the Draft SEIR, ending on July 3, 2018. An additional opportunity for comment includes consideration of the proposed project and certification of the Final SEIR at the Board of Supervisors hearing (to be scheduled; please refer to official notice and agenda).

1.3 SEIR CONTENTS

The scope of the SEIR includes an analysis of issues identified by the lead agency during the preparation of the NOP for the proposed project, as well as environmental issues raised by agencies and the general public in response to the NOP that were not previously analyzed in the 2008 Oak Shores WWTP EIR. The SEIR is divided into the following major sections:

Executive Summary. Provides a brief summary of the project background, description, impacts, and mitigation measures.

Introduction. Provides the purpose of the SEIR, as well as scope, content, and the use of the document.

Project Description. Provides the general background of the project, objectives, a detailed description of the project characteristics, and a listing of necessary permits and government approvals.

Environmental Setting. Describes the physical setting and surrounding land uses.

Environmental Impacts Analysis. Discusses the environmental setting as it relates to the various issue areas, regulatory settings, thresholds of significance, impact assessment and methodology, project-specific impacts and mitigation measures, cumulative impacts, and secondary impacts. The EIR analyzes the potentially significant impacts to the following resource areas, as identified during the preparation of the NOP:

- Aesthetic Resources
- Agricultural Resources
- Air Quality/Greenhouse Gas Emissions
- Biological Resources
- Cultural Resources
- Land Use and Planning

Other CEQA Considerations. Identifies growth-inducing impacts and discusses energy conservation and irreversible environmental changes.

Mitigation Monitoring and Reporting Program. This section contains a matrix of all mitigation measures contained in the SEIR, the requirements of the mitigation measures, the applicant's responsibility and timing for implementation of these measures, the party responsible for verification, the method of verification, and verification timing.

1.4 PROJECT SPONSORS

Lead Agency and Applicant: County of San Luis Obispo
Public Works Department
976 Osos Street, Room 207
San Luis Obispo, CA 93408
John Austin, Engineer IV

Environmental Consultant: SWCA Environmental Consultants
1422 Monterey Street, Suite C200
San Luis Obispo, CA 93401
Emily Creel, EIR Project Manager

1.5 REVIEW OF THE DRAFT SEIR

This Draft SEIR was distributed to responsible and trustee agencies, other affected agencies, surrounding cities, interested parties, and all parties requesting a copy of the Draft SEIR in accordance with Public Resources Code (PRC) Section 21092(b)(3). The Notice of Completion and Notice of Availability of the Draft SEIR were distributed and posted as required by CEQA. During this 45-day public review period, the SEIR and all technical appendices are available for review at https://www.slocounty.ca.gov/pw/oak-shores-wwtf-eir.

In addition, hard copies of the Draft SEIR are available for review at the following locations:

County of San Luis Obispo
Public Works Department
976 Osos Street, Room 207
San Luis Obispo, CA 93408

San Luis Obispo City/County Library
995 Palm Street
San Luis Obispo, California 93401

Comments on the Draft SEIR should be submitted to the County of San Luis Obispo Public Works Department as follows:

County of San Luis Obispo
Public Works Department
c/o Keith Miller, Environmental Resource Specialist
979 Osos Street, Room 207
San Luis Obispo, CA 93408
(805) 781-5714

Or via email to klmiller@co.slo.ca.us.

The public review period ~~is~~ was 45 days. Written responses to all environmental issues raised ~~will be~~have been prepared and ~~will be~~are included as part of the Final SEIR and the environmental record for consideration by decision-makers for the project. All changes to the SEIR resulting from the responses to comments are marked by a vertical line in the right margin, and added text is underlined and deleted text is ~~strikethrough~~.

This page intentionally left blank.

CHAPTER 2. PROJECT DESCRIPTION

The County of San Luis Obispo (County) Public Works Department proposes improvements to the County Service Area No. 7A (CSA-7A) Wastewater Treatment Facility (WWTF) in the community of Oak Shores, San Luis Obispo County, California. The proposed improvements would include upgrades to the wastewater treatment plant, sewage collection system, and effluent disposal system in and surrounding the community of Oak Shores. Similar upgrades were previously proposed and analyzed in the *Final Environmental Impact Report for the County Service Area 7 (Oak Shores) Wastewater Treatment Plant Upgrade Project* (Morro Group, Inc. 2008; referred to as the 2008 Oak Shores WWTP EIR). Changes to the design and location of the proposed effluent and sludge disposal system were subsequently proposed, and the revised WWTF facility upgrades are being further analyzed in this Supplemental Environmental Impact Report (SEIR).

Some of the information in this section has been developed with reference to the 2008 Oak Shores WWTP EIR; however, the focus of this SEIR is on the new or modified project components that were not previously analyzed in the 2008 Oak Shores WWTP EIR. These modifications are identified and described in further detail below.

2.1 PROJECT BACKGROUND

The County operates the CSA-7A (Oak Shores) WWTF. The existing Regional Water Quality Control Board (RWQCB) discharge permit for the WWTF references a build-out population of approximately 850 units and allows a maximum average daily flow of 100,000 gallons per day (gpd), averaged over the month. An effluent pump station at the existing treatment plant currently conveys treated effluent to disposal facilities, including three percolation basins and 1.3 acres of spray fields. In addition, two storage ponds provide temporary storage for use during the rainy season.

Although the wastewater system is not currently operating at maximum capacity, it has commitments to serve 911~~912~~ parcels: 655~~583~~ developed parcels in Oak Shores I, 196~~269~~ undeveloped parcels in Oak Shores I, and 60 undeveloped parcels in Oak Shores II. In 1984, a tentative tract map for Oak Shores II (Tract 1291) was approved, and an EIR was certified by the County Board of Supervisors. The tentative tract map subsequently expired and a revised tentative tract map for Oak Shores II (now Tract 2162) was approved; an SEIR for Oak Shores II was certified in 1996. Phase I (of VI) of Tract 2162 includes 60 parcels and received commitments to provide wastewater service from CSA-7A and final map approval by the County Board of Supervisors. In 2006, the County placed a moratorium on new annexations to the existing wastewater service area due to a lack of future capacity in the system. Implementation of the proposed project would increase the capacity of the existing system to meet all current commitments and serve Phases II through VI of approved tentative Tract Map 2162 (285 additional parcels). The proposed project would provide wastewater service capacity for 1,196~~1,197~~ parcels, including 655~~583~~ currently served parcels, 256~~329~~ parcels with existing commitments, and new commitments for an additional 285 parcels (Table 2-1). Improvements to the existing Oak Shores WWTF are required by the conditions of approval for tentative Tract 2162 prior to recordation of the final tract map for Phases II through VI. If the improvements are not completed, or if the improvement plans are not approved and bonded, the tentative map for Tract 2162 Phases II through VI will expire.

Table 2-1. Oak Shores WWTF Commitments

Tract	Total Approved Parcels	Existing Parcels Served	Existing Additional Commitments	Approved Parcels with No WWTF Commitment
Oak Shores I	851~~852~~	655~~583~~	196~~269~~	0
Oak Shores II	345	0	60	285
TOTAL	**1,196~~1,197~~**	**655~~583~~**	**256~~329~~**	**285**

To address the additional capacity required for Phases II through VI, the County proposed upgrades and additions to the Oak Shores WWTF in 2008, which included:

- upgrades to the existing treatment plant;
- additional percolation basins at the existing Kavanaugh percolation basin site;
- new sludge drying beds adjacent to the existing spray fields; and
- various sewer collection system improvement alternatives.

The 2008 project was analyzed in the 2008 Oak Shores WWTP EIR. Following County Board of Supervisors approval of the 2008 Oak Shores WWTP EIR, a neighboring property owner filed a California Environmental Quality Act (CEQA) challenge, with the intent of compelling an alternative to the proposed expansion of the Kavanaugh percolation ponds. The project was then put on hold.

In 2015, the current owner of Tract 2162 submitted a Wastewater System Capacity Study – Addendum No. 1 to address the specific needs of Phases II through VI of Tract 2162. The addendum was prepared to identify an alternative disposal site that has sufficient land area, acceptable soil and groundwater conditions, and reasonable proximity to the existing disposal facilities to eliminate the originally proposed expansion of the Kavanaugh percolation ponds and meet the original project objectives. The revised project now under consideration includes all components of the original WWTP Upgrade Project (Morro Group, Inc. 2008), except that the proposed percolation basins at the Kavanaugh site have been eliminated and replaced with new disposal facilities at Gregg Ranch, and the proposed sludge drying beds to be located at the existing storage pond and spray field location would be moved to a location either within the existing treatment plant or at the Gregg Ranch disposal site.

Total proposed WWTP upgrades, as revised, now include the following components:

1) upgrades to the existing treatment plant;
2) new storage pond and spray field at Gregg Ranch;
3) new sludge drying beds within the existing treatment plant or at Gregg Ranch; and
4) various sewer collection system improvement alternatives.

The SEIR analysis will focus on the modified project improvements that were not previously analyzed in the 2008 Oak Shores WWTP EIR. Each of the modified components is identified in Table 2-2 and described in detail in Section 2.3, Project Components, below.

Table 2-2. Project Components

WWTF Components	Proposed 2008 WWTF Upgrades	Currently Proposed WWTF Upgrades	To be Analyzed in Supplemental EIR?
Existing Treatment Plant Upgrade	New headworks, upgrade aerated lagoon system, retrofit stabilizing ponds, convert aeration basins to sludge-holding and digestion ponds, construct new pump station	New headworks, upgrade aerated lagoon system, retrofit stabilizing ponds, convert aeration basins to sludge-holding and digestion ponds, construct new pump station	**No** – this component was analyzed in the 2008 WWTP EIR and has not changed
Gregg Ranch Disposal Site	None	New storage pond and spray field	**Yes** – this is a new project component
Lift Station and Force Main	None	New lift station at existing spray field and 2.0-mile-long force main pipeline to Gregg Ranch disposal site	**Yes** – this is a new project component
Kavanaugh Percolation Basins	Additional percolation basins at existing Kavanaugh site	None	**No** – this project component is no longer proposed
Sludge Drying Beds	New sludge drying beds at existing spray field	New sludge drying beds at the existing treatment plant and/or Gregg Ranch	**Yes** – this component has changed since preparation of the 2008 WWTP EIR
Sewer Collection System	Various sewer collection system improvement alternatives	Various sewer collection system improvement alternatives	**No** – this component was analyzed in the 2008 WWTP EIR and has not changed

2.2 PROJECT LOCATION

The proposed project site is located within and adjacent to the Oak Shores Village Area, on the north shore of the Nacimiento Reservoir (Figures 2-1 and 2-2). Surrounding land uses generally include the Nacimiento Reservoir to the south and undeveloped open space, grazing land, and rural lands to the north, east, and west (see Figure 2-2).

The Gregg Ranch is a 160-acre parcel that was purchased by the owner of Oak Shores Tract II (Tract 2162) as a potential location for additional storage ponds and spray fields for the WWTF upgrade. The proposed Gregg Ranch spray field and storage pond would be located north of Lynch Canyon Road, approximately 0.25 mile west of Interlake Road.

The Gregg Ranch improvements also include a 2.0-mile-long force main pipeline generally extending from the proposed facilities at Gregg Ranch along Lynch Canyon Road and Oak Shores Drive to the existing storage ponds and spray fields. A new lift station would be constructed at the existing storage ponds and spray field location to pump treated wastewater to Gregg Ranch for disposal. The project also includes new sludge drying beds that would be located either within the existing treatment plant or at the Gregg Ranch disposal site.

The existing treatment plant is located on a 25.42-acre parcel within Oak Shores Village and accessed from Ridge Rider Road. The existing wet season storage ponds and spray fields are located on the west side of Oak Shores Drive, approximately 1.5 miles northwest of the treatment plant. The existing WWTF disposal system also includes percolation basins located approximately 2,000 feet southwest of the storage ponds and spray fields, approximately 250 feet east of Kavanaugh Creek (the Kavanaugh percolation basins). No improvements are proposed at the Kavanaugh percolation basins. The spray fields, wet season storage ponds, and Kavanaugh percolation basins are located on three adjacent parcels that are 7.9, 86.7, and 73 acres in size.

Figure 2-1. Project vicinity map.

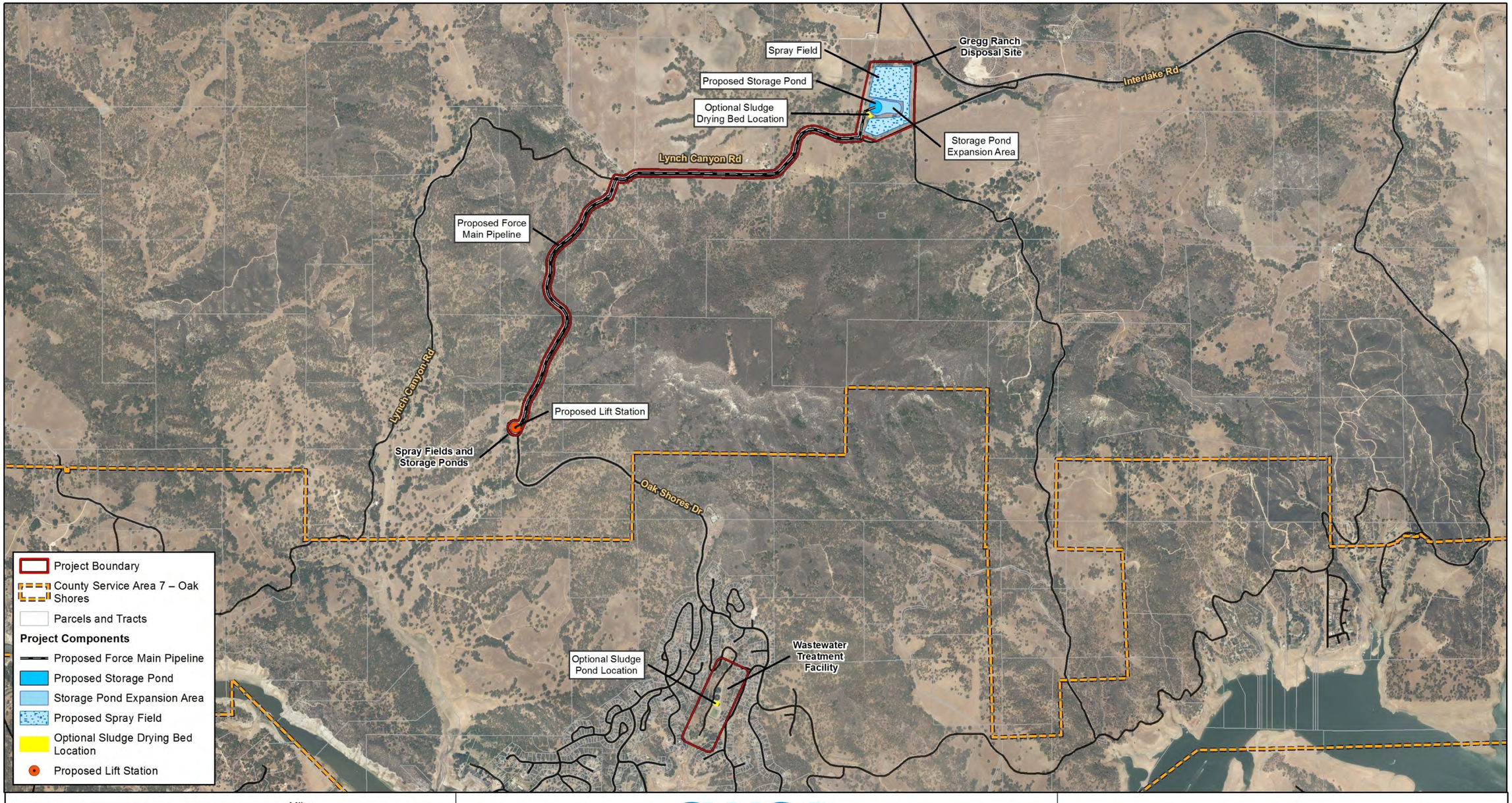


Figure 2-2. Project location map.

This page intentionally left blank.

2.3 PROJECT COMPONENTS

The existing CSA-7A WWTF disposal system includes spray fields, storage ponds, and the Kavanaugh percolation ponds. Use of the Kavanaugh percolation ponds was the primary contention raised in the CEQA challenge following County Board of Supervisors action on the 2008 Oak Shores WWTP EIR. To eliminate the use of the Kavanaugh ponds, or at a minimum restrict their use to current flows and practices (thus not requiring an expansion), a new disposal site at the 160-acre Gregg Ranch was identified. The County proposes to improve the existing effluent disposal system by constructing a new permanent disposal site at Gregg Ranch, including a 15-acre spray field and 10-acre-foot capacity storage pond (with capacity to expand to a 40-acre-foot capacity storage pond in the future), a 2.0-mile-long force main pipeline and associated lift station, and new sludge drying beds at either the existing treatment plant or Gregg Ranch.

The proposed project (including those components analyzed in the 2008 WWTP EIR that are still being proposed, even if not reevaluated in this SEIR) would increase the CSA-7A WWTF capacity to serve existing commitments to 329 currently unserved parcels, as well as an additional 285 residential parcels with no existing commitment, for a total of 1,197 parcels served. The project would increase the average daily flow capacity during the peak month from 100,000 gpd to 194,000 gpd (a 94,000-gpd increase).

2.3.1 Gregg Ranch Disposal Site

At Gregg Ranch, a new 10-acre-foot high-density polyethylene (HDPE)-lined storage pond would be constructed to store treated effluent during peak times until it can be discharged on the proposed 15-acre spray field (Figure 2-3). The storage pond would have expansion capability for a 40-acre-foot capacity storage pond; however, the 10-acre-foot storage pond would accommodate all phases of Tract 2162. The 15-acre spray field will have approximately 100 sprinklers at a height of 3 to 4 feet. The sprinkler heads will be designed to be moveable so that spray can be adjusted periodically. Hours of operation of the sprinklers will vary depending on actual flow to the wastewater treatment system; however, flows will likely be within an 8- to 12-hour workday.

No haul trips are expected to be necessary for excavation of the 10-acre-foot storage pond and 15-acre spray field. All grading would be balanced on-site. It is anticipated that approximately 10,000 cubic yards of cut and 10,000 cubic yards of fill would be necessary for grading of the 10-acre-foot storage pond. The area of disturbance for the storage pond is approximately 1.5 acres; the total pond surface area would be approximately 1 acre. Expansion of the pond into the 40-acre-foot capacity pond would require additional disturbance of approximately 6 acres; the total pond surface area would then be approximately 5 acres. Expansion to 40 acre-feet would require approximately 55,000 additional cubic yards of cut and 55,000 additional cubic yards of fill. These amounts would also be balanced on site by spreading on the spray field and/or construction of earthen berms. No material export is proposed.

2.3.2 Lift Station and Force Main Pipeline

The proposed Gregg Ranch disposal system includes a booster pump (lift) station and 10-inch-diameter force main pipeline that would extend from the existing storage ponds and spray fields approximately 2 miles to the Gregg Ranch property (see Figure 2-2). The proposed force main pipeline would generally be located along the western edge of the public right-of-way on Oak Shores Drive and the northern edge of the public right-of-way on Lynch Canyon Road, and would convey treated wastewater to the Gregg Ranch disposal site (see Figure 2-2). It is expected that approximately 1,200 cubic yards of imported material (sand) would be necessary for bedding of the proposed 10-inch-diameter force main pipeline trench along Oak Shores Drive and Lynch Canyon Road. The same quantity of native material would be exported to make room for the sand, resulting in a total of approximately 240 haul trips.

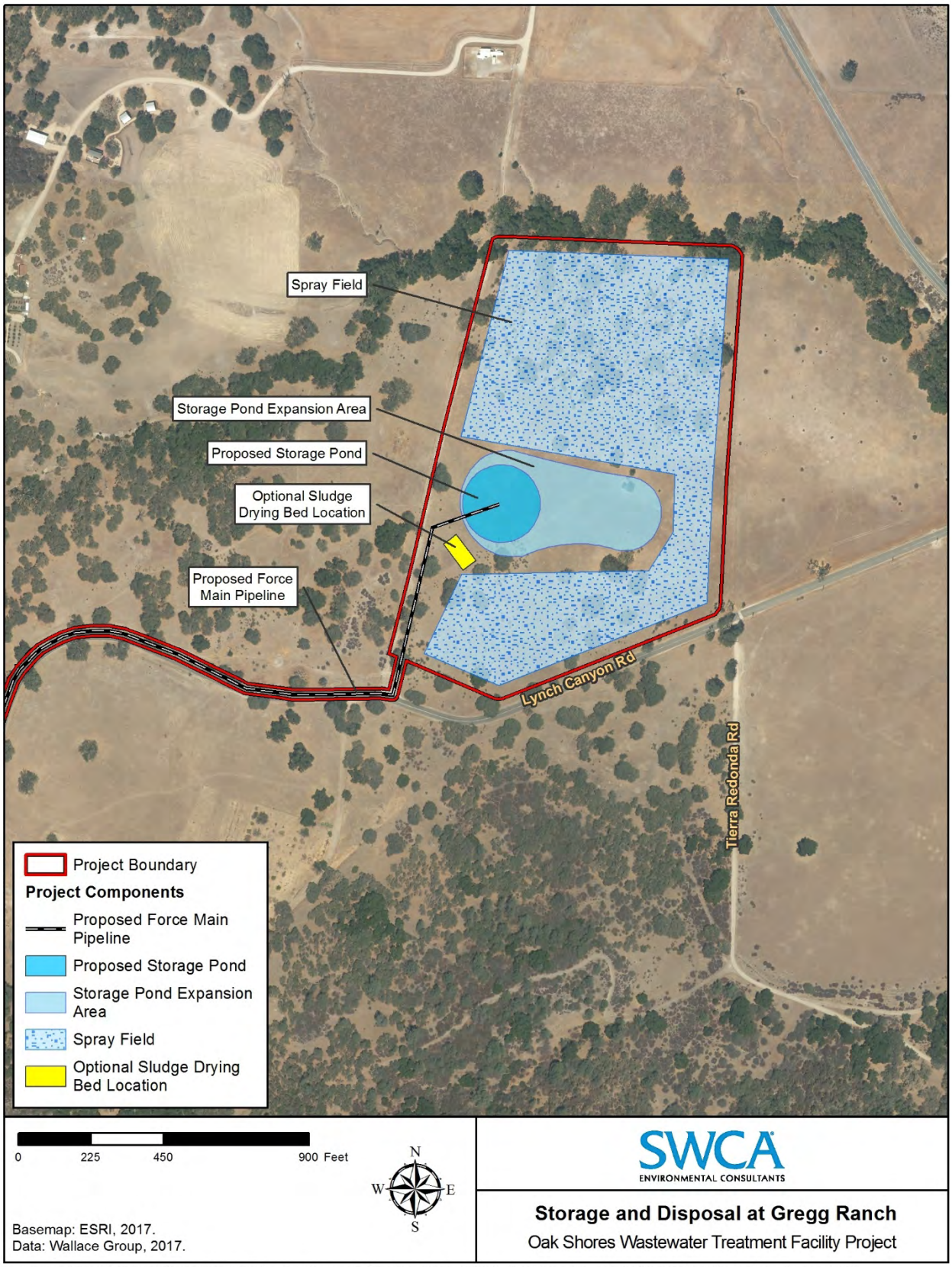


Figure 2-3. Proposed storage and disposal facilities at Gregg Ranch.

The proposed booster lift station would be located adjacent to the existing storage ponds and spray fields west of Oak Shores Drive (see Figure 2-2). The submersible (underground) lift station would include an 8-foot-diameter manhole and would require disturbance of approximately 20 square feet of surface area. Approximately 28 cubic yards of cut and 28 cubic yards of fill would be required for over-excavation for the submersible manhole to a depth of approximately 15 feet deep. The disturbed surface area would be returned to original conditions after construction.

2.3.3 Sludge-Drying Beds

The County proposes to construct 5,000 square feet of sludge drying beds either at the proposed Gregg Ranch disposal site (see Figure 2-3) or within the existing treatment plant (Figure 2-4). The sludge drying beds would be approximately 3 feet deep. Construction of the sludge drying beds would result in the disturbance of an 8,500-square-foot area, including 1,000 cubic yards of cut and 100 cubic yards of fill.

It is anticipated that in the first 5 years of operation, sludge would need to be withdrawn from the proposed storage ponds one to two times per year. As flow to the system increases, sludge transfers will increase up to a proposed maximum of six truck trips per year. One truck trip of wet sludge is estimated to be approximately 4,000 gallons. Drying is expected to take a couple of weeks, depending on weather conditions. Dried sludge would be trucked offsite to a County-approved facility (i.e., Cold Canyon Landfill, Engel and Gray composting, or similar facility). Approximately 31 tons of dry solids would be generated per year.

2.4 CONSTRUCTION SCHEDULE

The Gregg Ranch improvements and construction of the sludge drying beds are expected to begin in mid-April of the construction year and last for approximately 6 months, ending in mid-October. These dates correspond with the dry-weather period for construction stormwater measures. It is currently estimated that construction would begin in 2019; however, project construction could be delayed to subsequent years. In that case, the season and general duration would remain the same.

2.5 PROJECT OBJECTIVES

A portion of Oak Shores Village is served by CSA-7A for wastewater treatment and disposal. The proposed project consists of upgrades to the existing WWTF to meet the following objectives:

- Increase the CSA-7A WWTF system capacity to serve existing commitments and additional approved parcels within Oak Shores Village (Phases II through VI of Oak Shores II [Tract 2162]);
- Upgrade the existing treatment facility to improve efficiency and meet RWQCB requirements;
- Avoid expansion or increased use of the existing disposal facilities at the Kavanaugh percolation basin site; and
- Provide a location for an expanded storage pond that could accommodate future buildout of Oak Shores Village.

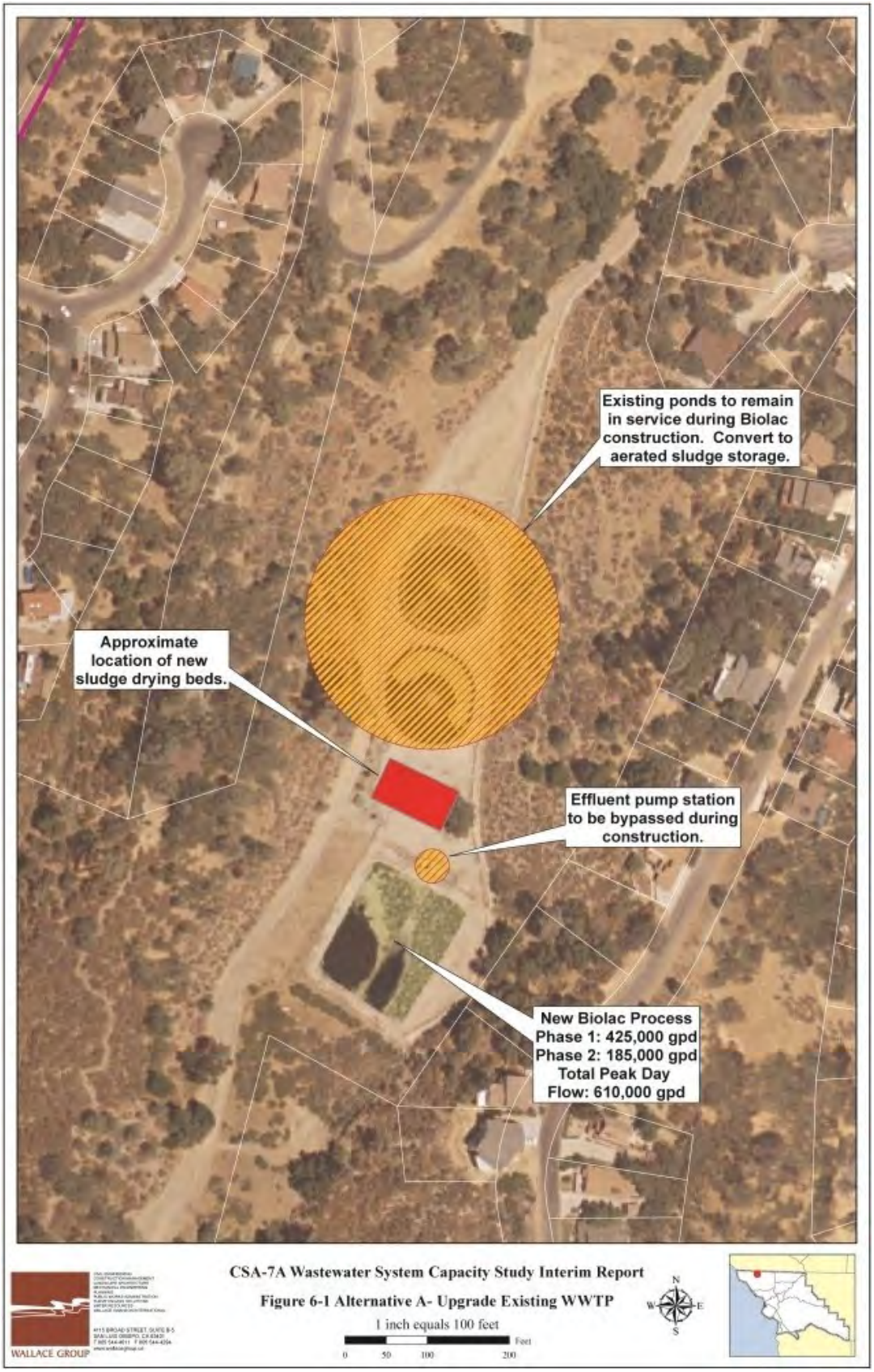


Figure 2-4. Proposed sludge drying beds at the wastewater treatment facility.

2.6 REQUIRED AGENCY ACTIONS AND PERMITS

Various permitting requirements would need to be met prior to implementation of the proposed project. Table 2-3, below, summarizes federal, state, and local permits that may be required for the project and the agencies that are expected to use the SEIR in their decision-making and permitting processes.

The County, as the CEQA lead agency, is responsible for administering the preparation of this SEIR and will be responsible for certifying the Final SEIR. Lead agency decision makers (i.e., the County Board of Supervisors) will use the SEIR as an informational document to assist in the decision-making process, ultimately resulting in the approval, denial, or assignment of conditions to the project. The County Public Works Department will be responsible for ensuring compliance with the mitigation measures certified in the Final SEIR. In addition, the County is required to obtain RWQCB approval of the Revised Report of Waste Discharge (ROWD), which will supersede the previous Waste Discharge Requirements (WDR) Order No. 01-130 for the treatment facility. This process is discussed further in Appendix A, the Notice of Preparation (NOP) and Initial Study Summary – Environmental Checklist, Section 13. Wastewater. Other potential responsible agencies and their regulatory authority are listed in Table 2-3.

Table 2-3. Agency Permit Requirements

Responsible Agency	Applicable Permit
County of San Luis Obispo	Board of Supervisors Approval
County of San Luis Obispo Public Works Department	Encroachment Permit, consistency with County Public Improvement Standards
Regional Water Quality Control Board	Waste Discharge Requirements
U.S. Army Corps of Engineers	Clean Water Act Section 404 Nationwide Permit
State Water Resources Control Board/ Regional Water Quality Control Board	Clean Water Act Section 401 Water Quality Certification
California Department of Fish and Wildlife	California Fish and Game Code Section 1602 Streambed Alteration Agreement
San Luis Obispo County Air Pollution Control District or California Air Resources Board	California Statewide Portable Equipment Registration and/or Air Pollution Control District permits for construction equipment or engines 50 horsepower or greater Operational permits for the proposed WWTF modifications
County of San Luis Obispo	Building Permits
State Water Resources Control Board/ Regional Water Quality Control Board	General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit) Stormwater Pollution Prevention Plan

This page intentionally left blank.

CHAPTER 3. ENVIRONMENTAL SETTING

This section of the Supplemental Environmental Impact Report (SEIR) describes the project's environmental setting, including physical conditions of the project vicinity, an overview of relevant plans and policies applicable to the proposed project, and a discussion of the cumulative development scenario and cumulative study area for the project.

3.1 PHYSICAL SETTING AND EXISTING LAND USES

The proposed project site is located within the general vicinity of the Oak Shores Village Area, on the north shore of the Nacimiento Reservoir, approximately 30 miles west of Paso Robles, in northern San Luis Obispo County. The Nacimiento Reservoir is a water source for San Luis Obispo and Monterey Counties, and also serves as a major recreational resource in the area. Development within Oak Shores Village includes single-family residential uses, recreational vehicle lots, marina and boating-related uses, and commercial/retail uses. Public facilities include the wastewater treatment facility (WWTF) and a fire station. Land uses surrounding the project site generally include the Nacimiento Reservoir to the south and undeveloped open space, grazing, and rural lands to the north, east, and west.

The topography of the project area is relatively flat to steeply sloping, with elevations generally ranging between approximately 900 feet above mean sea level at the existing WWTF to 1,200 feet at Gregg Ranch. The vegetation communities observed within the project site were characterized using A Manual of California Vegetation (Sawyer et al. 2009), and include blue oak woodland, California sagebrush scrub, bigberry manzanita chaparral, purple needlegrass grassland, non-native grassland, ruderal (disturbed) habitat, and developed areas. Developed features within the project site generally include the paved Oak Shores Drive and Lynch Canyon Road, as well as the existing WWTF. Throughout this SEIR, the project is generally broken down and discussed in three main project areas/components: the Gregg Ranch Disposal Site, the proposed lift station and 2.0-mile-long force main pipeline, and the proposed sludge drying bed location.

3.1.1 Gregg Ranch Disposal Site

Gregg Ranch is a 160-acre undeveloped parcel that is located approximately 2 miles northeast of the Oak Shores Village Reserve Line (VRL) and 0.1 mile west of Interlake Road (see Figures 2-2 and 2-3). Vegetation consists primarily of scattered mature oak trees and saplings, grassland, and dense riparian woodland corridor. An unnamed blue-line creek runs along the north boundary of the proposed disposal facilities before draining into San Antonio Lake, north of the project site. An unpaved dirt road extends along the western boundary of the proposed disposal facilities, and areas east of the disposal site include undeveloped agricultural land. Lynch Canyon Road forms the southern boundary of the Gregg Ranch site.

Topography at Gregg Ranch is generally flat to moderately sloping. Tierra Redonda Mountain is approximately 0.25 mile south of the Gregg Ranch site, which is also surrounded by other rolling hills to the east, west, and north.

3.1.2 Lift Station and 2.0-Mile Force Main

3.1.2.1 Lift Station

The proposed booster pump (lift) station would be located adjacent to the existing spray fields and storage pond located directly west of Oak Shores Road within the Oak Shores Village Reserve Area (see Figure 2-2). The existing spray field and storage pond location currently consists of approximately 1.3 acre of

spray field, with sprinklers approximately 3 feet in height, and two storage ponds totaling approximately 1.6 acres (a 0.7-acre lower pond and a 0.9-acre upper pond). A barbed-wire agricultural fence surrounds the existing spray field and storage pond. The area surrounding the existing spray field and storage pond location is undeveloped and generally supports oak woodland and grassland on gently sloping to steep surrounding slopes. The existing spray fields and storage ponds and proposed lift station location is within the Residential Single-Family land use category (see Figure 4.6-1).

The existing WWTF disposal system also includes the Kavanaugh percolation basins located approximately 2,000 feet southwest of the storage ponds and spray field, approximately 250 feet east of Kavanaugh Creek. No improvements are proposed at the Kavanaugh percolation basins.

3.1.2.2 2.0-Mile Force Main Pipeline

The proposed 2.0-mile-long force main pipeline would extend from the proposed lift station north, along the western edge of the County of San Luis Obispo's (County's) right-of-way along Oak Shores Drive, and east along the northern edge of the County right-of-way along Lynch Canyon Road to connect to the proposed Gregg Ranch disposal site (see Figure 2-2). The topography along the pipeline route ranges from flat (predominantly along Lynch Canyon Road) to steeply sloping (along Oak Shores Drive). Areas along and adjacent to the proposed pipeline route support non-native grassland, ruderal (disturbed) habitat, blue oak woodland, bigberry manzanita chaparral, purple needlegrass grassland, California sagebrush scrub, and developed areas. The proposed pipeline would cross five potentially jurisdictional drainage features and associated habitat (see Figure 4.4-5). The proposed pipeline would extend through the following land use categories: Residential Single-Family, Agriculture, and Commercial Retail (see Figure 4.6-1).

3.1.3 Sludge Drying Beds

The proposed sludge drying beds would be located at either the existing Oak Shores WWTF at Ridge Rider Road or at the proposed Gregg Ranch disposal site (see Figures 2-3 and 2-4). The existing treatment plant is located on a 25.42-acre parcel within Oak Shores Village and includes two storage ponds, a pump station, a small employee office, an access driveway, a parking area, chain-link fencing, and utilities. The Oak Shores WWTF is located in an area designated as Open Space. The area slopes down toward the Nacimiento Reservoir to the south and is surrounded by a County facility building and storage area to the north, and Oak Shores residential development to the north, east, and west. Surrounding residential development is located on ridgelines, and the topography slopes steeply down to the treatment plant area. Vegetation outside of the facility area consists of dense oak woodland and scrub.

If placed on the Gregg Ranch site, the new sludge drying beds would be located between the proposed storage pond and spray field (see Figure 2-3 and the previous description of Gregg Ranch in Section 3.1.1).

3.2 SURROUNDING LAND USES

Land uses surrounding the Gregg Ranch Disposal Site generally include rural residential and/or agricultural parcels to the north, east, south, and west. The closest development includes several rural residences and associated agricultural accessory buildings located west and northwest of Gregg Ranch. Land that is classified as Rural Lands is located to the north and northwest, which includes the 40-acre Ranchos Dos Amantes ranch and bed and breakfast (approximately 0.25 mile northwest of the Gregg Ranch project site). Designated Agriculture lands are located to the east, south, and west of Gregg Ranch.

With the exception of the entrance to Oak Shores Village, the areas surrounding the proposed 2.0-mile-long force main pipeline are largely undeveloped. The proposed lift station is surrounded by existing WWTF spray fields and storage ponds and undeveloped open space. Land uses and development surrounding the existing Oak Shores WWTF at Ridge Rider Road includes residential neighborhoods to the north, east, and west, and Nacimiento Lake and associated boating docks to the south.

3.3 REGULATORY SETTING

California Environmental Quality Act (CEQA) Guidelines Section 15125(d) states, "the EIR shall discuss any inconsistencies between the proposed project and applicable general plans and regional plans." While CEQA requires a discussion of consistency with public plans, inconsistency does not necessarily lead to a significant impact. Inconsistency with public plans creates significant impacts under CEQA only when an adverse physical effect on the environment would result from the inconsistency. This section generally describes the plans and policies applicable to the proposed project. A detailed consistency analysis is provided in Table 3-1, below. Although a preliminary determination regarding project consistency is made, it is the responsibility of the County Planning Commission or Board of Supervisors, the lead CEQA decision makers, to make the final determination regarding consistency issues.

3.3.1 Applicable Plans and Policies

The following plans and policies are applicable to the proposed project and are described in the following sections:

- County San Luis Obispo General Plan Land Use Element, Inland Framework for Planning
- North County (Inland) Area Plan
- Oak Shores Village Plan
- County of San Luis Obispo General Plan, Agriculture Element
- County of San Luis Obispo General Plan, Conservation and Open Space Element
- County of San Luis Obispo General Plan, Noise Element
- County of San Luis Obispo General Plan, Parks and Recreation Element
- County of San Luis Obispo General Plan, Safety Element
- County of San Luis Obispo EnergyWise Plan
- Basin Plan for the Central Coast Region
- 2001 Clean Air Plan

The County Land Use Ordinance (LUO), Title 22, Chapter 06.040(a) exempts "Public works projects constructed by the county or its contractors" from standards set in the LUO. This exemption also applies to the Oak Woodland Ordinance (Title 22 Chapter 22.58). Therefore, the County LUO and County Oak Woodland Ordinance are not applicable to the project and are not discussed in detail in this section.

Table 3-1 presents a preliminary analysis of the proposed project's potential consistency with the applicable plans and policies listed above. Additional consistency analysis with local plans and policies is provided in the environmental analysis chapter of the SEIR. For example, Section 4.3, Air Quality, includes an assessment of the project's consistency with the Clean Air Plan. All adverse physical effects resulting from any inconsistency are discussed in the appropriate environmental analysis sections of the SEIR (Chapter 4).

3.3.2 County of San Luis Obispo Plans and Policies

3.3.2.1 Inland Framework for Planning – Land Use Element

Part I of the County Land Use Element is the Framework for Planning. The Inland Framework contains policies and procedures that apply to the unincorporated area outside the coastal zone, and defines how the Land Use Element is used together with the LUO and other adopted plans. The Inland Framework also explains the criteria used in applying land use categories and combining designations to the land, and the operation of the Resource Management System. Combining designations are special map categories that identify areas of unique resources or potential hazards that necessitate more careful project review.

3.3.2.2 North County Area Plan

The North County Area Plan consolidates and reorganizes the former Adelaida, El Pomar-Estrella, Las Pilitas, Nacimiento, and Salinas River planning areas. This area plan is a part of Part II of the County of San Luis Obispo General Plan Land Use and Circulation Element (LUCE) and is consistent with other elements of the County General Plan. This plan describes population, housing, and economic trends and establishes policies and programs for land use, circulation, public facilities, services, and resources in the rural portions and unincorporated communities of the planning area.

3.3.2.3 Oak Shores Village Plan

The Oak Shores Village Plan is included in Part III of the County of San Luis Obispo General Plan LUCE. This plan describes County land use and transportation programs for a 20-year time frame in the Oak Shores Village area, including regulations also adopted in the LUO and Land Use Element. This plan provides information on land use, population, availability of resources and public services, and environmental characteristics. Programs listed in the village plan are non-mandatory actions that depend on availability of adequate funding.

3.3.2.4 County of San Luis Obispo General Plan

3.3.2.4.1 AGRICULTURE ELEMENT

The County Agriculture Element includes goals and policies focusing on the wise management and protection of important land resources in the county. The purpose of the Agriculture Element is to identify areas of the county with productive farms, ranches and soils, and establish goals, policies, and implementation measures that will enable their long-term stability and productivity.

3.3.2.4.2 CONSERVATION AND OPEN SPACE ELEMENT

The County Conservation and Open Space Element (COSE) consists of a policy and program document and a technical appendix. The COSE policy and program document includes separate chapters to address air quality, biological resources, cultural resources, energy, mineral resources, open space, visual resources, and water resources. The technical appendix includes the County's first baseline greenhouse gas (GHG) emissions inventory. The COSE is based on the principles of smart growth, with the intent to preserve unique or valuable natural resources, to manage development within the sustainable capacity of the county's resources, and to reduce the county's contribution to global climate change.

3.3.2.4.3 NOISE ELEMENT

The County Noise Element provides a policy framework for addressing potential noise impacts in the planning process and minimizing future noise conflicts. The Noise Element identifies transportation-related, stationary, and potential operational noise generators in the county, provides a list of noise-sensitive land uses, and identifies acceptable and unacceptable thresholds of noise exposure based on land use. The Noise Element also provides mitigation measures that should be applied to projects when noise attenuation is required to meet identified thresholds.

3.3.2.4.4 SAFETY ELEMENT

The two primary principles of the County Safety Element are emergency preparedness and development appropriately managed to reduce risk. The Safety Element identifies potential emergency situations and natural disaster risks within the county, and includes goals and policies for response during an emergency or natural disaster and measures for the avoidance of unnecessary risk.

3.3.2.4.5 PARKS AND RECREATION ELEMENT

The Parks and Recreation Element establishes goals, policies, and implementation measures for management, renovation, and expansion of existing, and development of new, parks and recreation facilities in order to meet existing and projected needs and to ensure an equitable distribution of parks throughout the county. The purpose of the Parks and Recreation Element is to: 1) provide policy guidance regarding the provision of park and recreation services; 2) document the county's existing park and recreation resources; and 3) facilitate the evaluation of park and recreation needs including those resources that are outside the County's management during the land use decision process.

3.3.2.5 County of San Luis Obispo EnergyWise Plan

The EnergyWise Plan is a requirement of the COSE and is intended to facilitate the goals of the COSE, although implementation of the reduction measures contained in the plan will require action by the Board of Supervisors. This plan builds upon the goals and strategies of the COSE to reduce local GHG emissions. It identifies how the County will achieve the GHG emissions reduction target of 15% below baseline levels by the year 2020 in addition to other energy efficiency, water conservation, and air quality goals identified in the COSE. The EnergyWise Plan will also assist in the County's participation in the regional effort to implement land use and transportation measures to reduce regional GHG emissions from the transportation sector by 2035.

3.3.2.6 2017 Water Quality Control Plan for the Central Coast Basin

The Water Quality Control Plan for the Central Coast Basin (Basin Plan) is the Regional Water Quality Control Board's (RWQCB's) master water quality control planning document. It designates beneficial uses and water quality objectives for waters of the state, including surface waters and groundwater. It also includes programs of implementation to achieve water quality objectives. Periodically, the RWQCB considers amendments to the Basin Plan. Each amendment is subject to an extensive public review process. At a public hearing, the RWQCB may act to adopt the amendment. Adopted amendments are subject to approval by the State Water Resources Control Board (SWRCB), the Office of Administrative Law, and, in most cases, the U.S. Environmental Protection Agency (USEPA).

3.3.2.7 2001 Clean Air Plan

As part of the California Clean Air Act, the San Luis Obispo County Air Pollution Control District (SLOAPCD) is required to develop a plan to achieve and maintain the state ozone standard by the earliest practicable date. The Clean Air Plan (CAP) outlines the District's strategies to reduce ozone precursor emissions from a wide variety of stationary and mobile sources. The 2001 CAP was adopted by the SLOAPCD at their hearing on March 26, 2002.

Table 3-1. Consistency with Plans and Policies

Goals, Policies, Plans, Programs and Standards	Intent of the Policy in Relation to Avoiding or Mitigating Significant Environmental Impacts	Preliminary Consistency Determination
County of San Luis Obispo General Plan, Land Use Element – Framework for Planning (Inland)		
Strategic Growth Principle 1: Preserve open space, scenic natural beauty and natural resources. Conserve energy resources. Protect agricultural land and resources.		
Policy 2. Keep the amount, location, and rate of growth allowed by the Land Use Element within the sustainable capacity of resources, public services and facilities.	The intent of this policy is to prevent development that cumulatively would use resources or public services at an unsustainable rate.	Potentially Consistent. The proposed project would expand the capacity of current public services in order to sustainably meet existing service commitments to approved community parcels.
Policy 3. Preserve and sustain important water resources, watersheds and riparian habitats.	The intent of this policy is to protect important water resources, watersheds, and riparian habitats.	Potentially Consistent. Development adjacent to or near surface waters is subject to specific design and construction standards in order to ensure the project's stormwater is adequately contained and directed offsite without adversely affecting downstream locations. The proposed facilities on the Gregg Ranch disposal site have been located and designed to avoid impacts to existing onsite drainages and riparian habitats. The proposed spray field and storage ponds would be bermed to prevent any offsite runoff and the proposed Gregg Ranch disposal site would be subject to Water Discharge Requirements established by the RWQCB.
Policy 4. Preserve and protect the air quality of the county by seeking to exceed or at least maintain the minimum state and federal ambient air quality standards.	The intent of this policy is to maintain and improve good air quality within the county.	Potentially Consistent. The proposed project would result in temporary construction emissions and minor long-term operational emissions. Based on analysis in the air quality section of this report, the proposed project would create emissions below federal and state air quality thresholds.
Policy 6. Encourage the protection and use of agricultural land for the production of food, fiber and other agricultural commodities, and support the rural economy and locally-based commercial agriculture.	The intent of this policy is to protect and utilize agricultural resources within the county.	Potentially Consistent. The Gregg Ranch disposal site is located within the Agriculture land use designation and has soils listed as Grazing Land and Farmland of Local Potential. The project would convert this agricultural land to a public facility (wastewater disposal), but would not prohibit continued use of the site for grazing, as currently conducted at the existing spray field location. The spray fields may be used for agronomic production of feed.
Policy 7. Give highest priority to avoiding significant environmental impacts from development through site and project design. Where such impacts cannot be avoided, minimize them to the maximum extent feasible.	The intent of this policy is to avoid and/or minimize significant environmental impacts for development projects.	Potentially Consistent. The proposed project has been designed and revised so as to avoid significant environmental impacts and residual impacts are minimized through mitigation measures.

Goals, Policies, Plans, Programs and Standards	Intent of the Policy in Relation to Avoiding or Mitigating Significant Environmental Impacts	Preliminary Consistency Determination
Strategic Growth Principle 2: Strengthen and direct development toward existing and strategically planned communities.		
Policy 1. Maintain rural areas in agriculture, low intensity recreation, very low-density residential uses, and open space uses that preserve and enhance a well-defined rural character.	The intent of this policy is to protect the character of rural communities.	Potentially Consistent. The proposed project would result in a public services land use in a rural area; however, the use would potentially be less appropriate in an urbanized area and was determined to be generally consistent with surrounding land uses.
Policy 3. Plan for most future development to be within existing and strategically planned cities and communities.	The intent of this policy is to focus development within existing communities and minimize development outside them.	Potentially Consistent. Proposed project components located on Gregg Ranch and along Lynch Canyon Road are located outside the Oak Shores VRL. However, they are intended to facilitate permitted and potential future growth within previously developed areas in the Oak Shores Village.
Policy 10. The cost of additional services and facilities will be fairly shared among those who most immediately benefit and the entire community.	The intent of this policy is to fairly distribute the cost of public services among its beneficiaries.	Potentially Consistent. The cost of the proposed WWTF improvements will be fairly shared among the residents of Oak Shores. The County has conducted public outreach with the Oak Shores community regarding the cost of the proposed improvements.
Strategic Growth Principle 3: Foster distinctive, attractive communities with a strong sense of place.		
Policy 2. Protect rural areas between communities to achieve well-defined communities within an attractive rural setting.	The intent of this policy is to protect the visual character of rural areas.	Potentially Consistent. Proposed project components located on Gregg Ranch and along Oak Shores Drive are located outside the existing community of Oak Shores. However, with implementation of recommended mitigation measures, the proposed improvements would not result in significant visual impacts to the rural setting and would be generally consistent with surrounding agricultural uses.
County of San Luis Obispo General Plan, Land Use Element – Framework for Planning (Inland) Combining Designations, Geological Study Area		
Combining Designation, Geological Study Area, Objective 1. Structures for human occupancy are not to be constructed over an active fault area (identified by the Alquist-Priolo Geologic Hazards Zone Act Maps of the San Andreas Fault, on file in the Planning Department), without county review and approval.	The intent of this policy is to avoid or minimize risk from known active fault areas.	Potentially Consistent. The project does not propose structures for human occupancy.
Combining Designation, Geological Study Area, Objective 2. Proposed projects in the Geologic Study Area are subject to site specific soil and geologic evaluations by a registered civil engineer or engineering geologist (as appropriate) as to the suitability of the site for	The intent of this policy is to avoid or minimize risk form geologic hazards and ensure compliance with the LUO.	Potentially Consistent. No significant geologic hazards above those identified in the 2008 WWTP EIR are present on proposed project sites. All proposed facilities would be constructed in accordance with current established engineering practices. The new project component site, Gregg Ranch, is not within the Geological Study Area designation.

Goals, Policies, Plans, Programs and Standards	Intent of the Policy in Relation to Avoiding or Mitigating Significant Environmental Impacts	Preliminary Consistency Determination
development in accordance with the Land Use Ordinances.		
Combining Designation Standards, Section 22.14.070, Geological Study Area C. Application content - Geology and Soils Report required. D. Review of geology report. E. Geologic Study Area special standards.	The intent of these policies is to minimize risk associated with geologic hazards.	Potentially Consistent. The geology and soils report conducted for the 2008 WTTP EIR meets current regulatory standards. The new project component area, Gregg Ranch, is not within the Geological Study Area designation.
County of San Luis Obispo General Plan, Land Use Element – Framework for Planning (Inland) Combining Designations, Sensitive Resource Area		
Combining Designation, Sensitive Resource Area, Objective 1 Buildings and structures should be designed and located in harmonious relationships with surrounding development and the natural environment.	The intent of this policy is to ensure developments are visually compatible with the surrounding area.	Potentially Consistent. The proposed project introduces minimal structural components (e.g., sprinklers, earthen berms) in a previously undeveloped area that would be visible from public roadways. The proposed lift station and force main pipeline would be subsurface. Mitigation has been proposed to reduce the visibility of the project, including through preservation of mature vegetation for screening and setbacks from surrounding properties. With implementation of the identified measures, the project would be generally compatible with the surrounding area and would be consistent with this policy.
Combining Designation, Sensitive Resource Area, Objective 2 Buildings, structures and plant materials should be constructed, installed or planted to avoid unnecessary impairment of scenic views.	The intent of this policy is to protect scenic views through site design and location of proposed development.	Potentially Consistent. The sludge drying bed and proposed project components on the Gregg Ranch project site are not located within a sensitive resource area. The proposed force main pipeline and lift station would be subsurface and would avoid impairment of scenic views.
Combining Designation, Sensitive Resource Area, Objective 3 Potentially unsightly features should be located to be inconspicuous from streets, highways, public walkways and surrounding properties; or effectively screened from view.	The intention of this policy is to protect public views from unsightly features through site location and design.	Potentially Consistent. The proposed wastewater treatment facilities could be considered unsightly and are within public viewsheds from Lynch Canyon Road and surrounding properties. Mitigation measures have been recommended that would reduce visibility of the project from these viewpoints, including preservation of mature vegetation for screening and setbacks from surrounding properties. Upon implementation of these measures, the project would be consistent with this policy.
Combining Designation, Sensitive Resource Area, Objective 4	The intent of this policy is to maximize retention of existing visual resources on site of proposed development.	Potentially Consistent. The proposed project would result in the removal of multiple mature oak trees on the Gregg Ranch disposal site. Mitigation measures have been recommended to minimize the number of oak trees removed. The majority of the site of the proposed pipeline

Goals, Policies, Plans, Programs and Standards	Intent of the Policy in Relation to Avoiding or Mitigating Significant Environmental Impacts	Preliminary Consistency Determination
Natural topography, vegetation and scenic features of the site should be retained and incorporated into proposed development.		is in a previously disturbed area and vegetation removal would be temporary. The proposed lift station would be subsurface and disturbed areas would be restored to original conditions.
Combining Designation, Sensitive Resource Area, Objective 5 Buildings and non-farm structures on agricultural property should be located to cause the least possible conflict with agricultural production by siting them away from the productive agricultural land, while still protecting to the greatest extent possible the scenic and environmental quality of the sensitive resource area.	The intent of this policy is to protect agricultural scenic resources by avoiding or minimizing conflict with non-agricultural uses.	Potentially Consistent. The proposed project is located and designed to have minimal impact on surrounding agricultural and scenic resources. Proposed uses on the Gregg Ranch project site would still be compatible with specific agricultural uses, such as grazing. Mitigation has been proposed to protect the scenic quality of the Sensitive Resource Area (SRA) to the greatest extent possible. With implementation of the identified measures, the proposed project would be consistent with this policy.
Article 3, Combining Designation Standards, Section 22.14.100 - Sensitive Resource Area, D. Minimum site design and development standards. All uses within a SRA shall conform to the following standards: 4. Where an SRA is applied because of prominent geological features visible from off-site (such as rock outcrops), those features shall be protected and remain undisturbed by grading or development activities. 5. Where an SRA is applied because of specified species of trees, plants or other vegetation, such species are not to be disturbed by construction activities or subsequent operation of the use, except where authorized by Conditional Use Permit approval.	The intent of this policy is to establish standards for development within designated SRAs.	Potentially Consistent. The proposed lift station and a portion of the proposed force main pipeline are within the designated SRA for Tierra Redonda Mountain, a prominent geological feature with sensitive ecological habitats. Sensitive plant species located within those project sites would be disturbed as a result of the proposed project, but would be restored to existing conditions after construction is complete. Mitigation measures have been recommended that would ensure the project's consistency with this policy.
San Luis Obispo County Inland Area Plans, North County Area Plan		
Chapter 6.2 Area Plan Combining Designations, 34. Lake Nacimiento Drive Interlake Road (SRA). The portion of this route from Chimney Rock Road northwest to the Monterey County line is an adopted State scenic highway route. All development in this corridor must be sited to minimize visual impacts.	The intent of this policy is to minimize visual impacts along the scenic highway corridor of Lake Nacimiento/Interlake Road.	Potentially Consistent. The proposed project footprint is not within the scenic highway corridor boundaries, and views of the site from Interlake Road would be largely obscured by existing mature vegetation, topography, and distance. Visibility of the proposed project would have less than 3 seconds of exposure to viewers travelling along Interlake Road and the proposed infrastructure would be surrounded by earthen berms that would be generally consistent with surrounding conditions, particularly when viewed from a distance. Mitigation identified in the SEIR would further reduce the size and visibility of the proposed disposal facilities from surrounding public roadways.

Goals, Policies, Plans, Programs and Standards	Intent of the Policy in Relation to Avoiding or Mitigating Significant Environmental Impacts	Preliminary Consistency Determination
Chapter 6.2 Area Plan Combining Designations, 41. Tierra Redonda Mountain (SRA). A major landmark located north of Lake Nacimiento, this broad table top mountain encompasses approximately 1300 acres with 320 acres under Bureau of Land Management (BLM) ownership. The mountain is of outstanding ecological importance and has been given a high priority for preservation by the State Department of Parks and Recreation. Most of the public lands are generally designated for open space use only. Emphasis should be placed on maintenance of the entire mountain as an undisturbed ecosystem rather than several small isolated preserve areas. Use should be carefully regulated because of fire hazard problems and potential damage to fragile ecosystems.	The intent of this policy is to protect scenic and biological resources within the Tierra Redonda Mountain natural area.	Potentially Consistent. Project components within the Tierra Redonda Mountain SRA have been designed to minimize impacts to scenic and biological resources within the area. These components include the lift station and a portion of the force main pipeline, which would both be subsurface installments.
County of San Luis Obispo General Plan, Land Use Element – Framework for Planning (Inland) Public Facility Development Guidelines		
Community Sewage and Wastewater Facilities Wastewater treatment facilities are important to maintain domestic water quality and to protect public health and safety. Sewer service should not be extended beyond urban service lines where such extension would impair the adequacy of service within the USL or where such extension would not be in conformity with the general plan. Facilities should be located and designed so as to minimize conflicts with surrounding uses. Heavily populated areas should be avoided in site selection.	The intent of this policy is to establish guidelines for extension and location of sewage and wastewater facilities.	Potentially Consistent. Proposed facility upgrades would not impair the adequacy of service within the urban service line(USL), and the extension of services is consistent with the general plan. The proposed spray field and storage pond are located and designed so as to minimize conflicts with surrounding land uses. Additional mitigation measures have been recommended to further reduce these potential conflicts.
County of San Luis Obispo General Plan, Agricultural Element		
Agricultural Policy 17 (AG17): Agricultural Buffers. a. Protect land designated as Agriculture and other lands in production agriculture by using natural or man-made buffers where adjacent to non-agricultural land uses in accordance with the agricultural buffer policies adopted by the Board of Supervisors (see Appendix C).	The intent of this policy is to minimize the conflict between agriculture and surrounding non-agricultural land uses.	Potentially Consistent. Land surrounding the Gregg Ranch disposal site is within the Agricultural and Rural Lands land use designations and has been grazed historically. Mitigation has been recommended to preserve mature oaks adjacent to the site boundaries, and the proposed spray field and storage pond would be surrounded by earthen berms. No additional buffers are proposed for agricultural purposes. The proposed uses on Gregg Ranch, however, are considered compatible with agricultural uses and grazing.

Goals, Policies, Plans, Programs and Standards	Intent of the Policy in Relation to Avoiding or Mitigating Significant Environmental Impacts	Preliminary Consistency Determination
Agricultural Policy 18 (AGP18): Location of Improvements a. Locate new buildings, access roads, and structures so as to protect agricultural land.	The intent of this policy is to project agricultural resources from non-agricultural uses.	Potentially Consistent. The Gregg Ranch project site is within the Agricultural land use designation but does not propose a use that would substantially conflict with existing adjacent agricultural uses. The project does not propose new buildings or access roads at Gregg Ranch and the site does not support Important Farmland. Public utility facilities are an allowable use within the Agriculture land use designation with a Conditional Use Permit.
Agricultural Policy 24 (AGP24): Conversion of Agricultural Land. a. Discourage the conversion of agricultural lands to non-agricultural uses through the following actions: 1. Work in cooperation with the incorporated cities, service districts, school districts, the County Department of Agriculture, the Agricultural Advisory Liaison Board, Farm Bureau, and affected community advisory groups to establish urban service and urban reserve lines and village reserve lines that will protect agricultural land and will stabilize agriculture at the urban fringe. 2. Establish clear criteria in this plan and the Land Use Element for changing the designation of land from Agriculture to non-agricultural designations. 3. Avoid land redesignation (rezoning) that would create new rural residential development outside the urban and village reserve lines. 4. Avoid locating new public facilities outside urban and village reserve lines unless they serve a rural function or there is no feasible alternative location within the urban and village reserve lines.	The intent of this policy is to discourage the conversion of agricultural lands to non-agricultural uses.	Potentially Consistent. If the proposed sludge drying beds were to be located at Gregg Ranch, all proposed project components would be outside the VRL. However, the proposed disposal facilities are generally better suited to rural sites. There is the potential to grow feed crops onsite with the treated wastewater, thereby maintaining an agricultural use.
Agricultural Policy 26 (AGP26): Streams and Riparian Corridors. The following policies apply to watercourses shown by a solid or broken blue line ("blueline" streams) on the latest U.S. Geological Survey (USGS) quadrangle maps and their associated riparian vegetation. As noted earlier in this chapter, the county's Local Coastal Plan (LCP) shall take precedence over these policies where the LCP addresses these issues. a. Encourage private landowners to protect and preserve stream corridors in their natural state and to restore stream corridors that have been degraded. Provide information and incentives to eliminate overgrazing in	The intention of this policy is protect natural watercourses and associated riparian habitats and ensure compliance with federal and state regulations regarding work in and around waterways and riparian habitats.	Potentially Consistent. The proposed project is designed to avoid impacts to the blue-line stream and its associated riparian vegetation located on the Gregg Ranch site. The proposed force main pipeline corridor includes five drainage features. Mitigation measures have been recommended to avoid significant impacts and ensure adherence to federal and state requirements.

Goals, Policies, Plans, Programs and Standards	Intent of the Policy in Relation to Avoiding or Mitigating Significant Environmental Impacts	Preliminary Consistency Determination
stream corridors. Encourage off-stream livestock watering sources. b. For new development requiring a discretionary permit and for land divisions, protect streams and riparian habitat affected by the proposal through the following measures: 1. Consistent with the requirements of the Regional Water Quality Control Board's Basin Plan, establish a grading and building setback of 30 feet from the top of the stream bank. Locate buildings and structures outside the setback. Do not remove riparian vegetation within 30 feet of the top of the stream bank. Provide for adjustments when the applicant demonstrates that such setbacks would have a significant negative impact on the agricultural viability of the site, or where alternatives are infeasible or more environmentally damaging, and the adjustments are acceptable to the Regional Board. 2. Require appropriate erosion control measures during and following construction. 3. Consistent with state and federal requirements, allow steam alterations for water supply and flood control projects, road maintenance, maintenance of existing channels, or improvement of fish and wildlife habitat if there are no practical alternatives. 4. Consistent with state and federal requirements, assure that stream diversion structures protect habitats. 5. When significant impacts to stream or riparian resources are identified, the landowner shall implement county-approved mitigation measures consistent with the existing requirements of CEQA.		
Agricultural Policy 30 (AGP30): Scenic Resources. b. In designated scenic corridors, new development requiring a discretionary permit and land divisions shall address the protection of scenic vistas as follows: 1. Balance the protection of the scenic resources with the protection of agricultural resources and facilities. 2. When selecting locations for structures, access roads, or grading, the preferred locations will minimize visibility from the scenic corridor and be compatible with agricultural operations. 3. Use natural landforms and vegetation to screen development whenever possible.	The intent of this policy is to balance protection of scenic resources with protection of agricultural resources.	Potentially Consistent. While the proposed project is not an agricultural facility, visibility of the proposed project from Interlake Road (a designated scenic highway) is minimal and has been further minimized through recommended mitigation (avoidance of oak woodland habitat at the north end of the project site and retention of existing natural vegetation for screening), consistent with this policy.

Goals, Policies, Plans, Programs and Standards	Intent of the Policy in Relation to Avoiding or Mitigating Significant Environmental Impacts	Preliminary Consistency Determination
4. In prominent locations, encourage structures that blend with the natural landscape or are traditional for agriculture.		
Agricultural Policy 33 (AGP33): Archaeological and Cultural Sites. a. When reviewing discretionary development, protect sensitive archaeological and cultural sites by avoiding disturbance where feasible. b. If sensitive sites cannot be avoided, mitigate the impact of development to the maximum extent feasible.	The intent of this policy is to protect and minimize impacts to sensitive archeological resources.	Potentially Consistent. The proposed project area has been surveyed for significant archaeological resources and survey results were negative within the proposed area of disturbance. Additional mitigation has been recommended to reduce potential impacts related to the inadvertent discovery of sensitive archaeological and cultural sites.
Agricultural Policy 34 (AGP34): Historical Resources. a. When initiated by landowners, protect the character of significant historical features and settings by implementing the recommendation for historical resources found in the Cultural Resources chapter of the Conservation and Open Space Element.	The intent of this policy is to protect and minimize impacts to historical resources.	Potentially Consistent. The proposed project would not disturb or have any adverse effect on significant historical features or settings.
County of San Luis Obispo General Plan, Conservation and Open Space Element – Chapter 2. Air Quality Resources		
Air Quality Policy (AQ 3.8) Reduce dust emissions Reduce PM10 and PM2.5 emissions from unpaved and paved County roads to the maximum extent feasible. -Implementation Strategy AQ 3.8.1 Reduce PM emissions from County roads 1) Implement all APCD particulate matter (PM) emission controls. 2) Continue efforts to clean paved roads, and 3) Pave or "chip seal" public County dirt roads to minimize fugitive dust.	The intent of this policy is to minimize dust emissions and ensure compliance with APCD regulations regarding particulate matter.	Potentially Consistent. Mitigation measures have been recommended to minimize dust emissions from the proposed project and upon implementation of these measures, the project would be consistent with this policy.
Air Quality Policy (AQ 4.3) GHG emissions from County operations Actively work to reduce greenhouse gas emissions from County operations, specifically in the sectors of energy, transportation, and waste, as identified in the 2006 Greenhouse Gas Emissions Baseline Inventory Report.	The intent of this policy is to reduce GHG emissions from County operations.	Potentially Consistent. The proposed project's GHG emissions would be below established thresholds by the SLOAPCD.
Air Quality Policy (AQ 4.4) Development projects and land use activities Reduce greenhouse gas emissions from development projects and other land use activities.	The intent of this policy is to reduce GHG emissions from development projects and land use activities.	Potentially Consistent. The proposed project's GHG emissions would be below established thresholds by the SLOAPCD.

Goals, Policies, Plans, Programs and Standards	Intent of the Policy in Relation to Avoiding or Mitigating Significant Environmental Impacts	Preliminary Consistency Determination
County of San Luis Obispo General Plan - Conservation and Open Space Element		
Biological Resource Policy BR 1.10 Identify and Protect Ecologically Sensitive Areas Protect and enable management of ecologically sensitive areas to the maximum extent feasible.	The intent of this policy is to minimize impacts to ecologically sensitive areas.	Potentially Consistent. The Tierra Redonda Mountain SRA designation was established to protect ecological and visual resources. Proposed project components within the Tierra Redonda SRA are subsurface and native soils and vegetation would be restored. Therefore, the proposed project is consistent with this policy.
Biological Resources Policy BR 1.15 Restrict Disturbance in Sensitive Habitat during Nesting Season Avoid impacts to sensitive riparian corridors, wetlands, and coastal areas to protect bird-nesting activities.	The intent of this policy is to avoid impacts to sensitive riparian corridors, wetlands, and coastal areas to protect bird nesting activities.	Potentially Consistent. Mitigation has been recommended to avoid potential impacts to riparian or sensitive habitat areas and to ensure construction activities are scheduled to avoid impacts to nesting birds to the greatest extent possible. With the implementation of the recommended mitigation measures, the proposed project would be consistent with this policy.
Biological Resources Policy BR 2.2 Promote Early Consultation with Other Agencies Require applicants to consult with all agencies with review and/or permit authority for projects in areas supporting wetlands and special-status species at the earliest opportunity	The intent of this policy is to ensure project applicants consult with relevant public agencies early in areas supporting wetlands and special-status species.	Potentially Consistent. The project does not support wetlands and the occurrence of special-status wildlife species is unlikely. If present, potential impacts to special-status species would be avoided and/or minimized through the implementation of mitigation measures.
Biological Resources Policy BR 2.6 Development Impacts to Listed Species Ensure that potential adverse impacts to threatened, rare, and endangered species from development are avoided or minimized through project siting and design. Ensure that proposed development avoids significant disturbance of sensitive natural plant communities that contain special-status plant species or provide critical habitat to special-status animal species. When avoidance is not feasible, require no net loss of sensitive natural plant communities and critical habitat areas.	The intent of this policy is to minimize overall impact to threatened, rare, and endangered species through project siting and design.	Potentially Consistent. Mitigation has been recommended to avoid and/or minimize potential impacts to sensitive species and habitat areas, including reconfiguration of proposed spray field areas to minimize impacts to oak woodland habitat and sagebrush scrub.
Biological Resources Policy BR 3.1 Native Tree Protection Protect native and biologically valuable trees, oak woodlands, trees with historical significance, and forest habitats to the maximum extent feasible.	The intent of this policy is to retain native tree species and forest habitats with biological or historical significance.	Potentially Consistent. The proposed project would result in the removal of mature native oak trees. Mitigation measures have been recommended to minimize the number of mature oak trees removed to the maximum extent feasible and mitigate for trees that must be removed. Upon implementation of recommended mitigation measures, the proposed project would be consistent with this policy.

Goals, Policies, Plans, Programs and Standards	Intent of the Policy in Relation to Avoiding or Mitigating Significant Environmental Impacts	Preliminary Consistency Determination
Biological Resources Policy BR 3.3 Oak Woodland Preservation Maintain and improve oak woodland habitat to provide for slope stabilization, soil protection, species diversity, and wildlife habitat.	The intent of this policy is to preserve and improve native oak woodland within the county.	Potentially Consistent. Mitigation measures have been recommended in this SEIR to protect oak woodland habitat and to replace native mature oak trees that would be removed.
Biological Resources Policy BR 4.1 Protect Stream Resources Protect streams and riparian vegetation to preserve water quality and flood control functions and associated fish and wildlife habitat.	The intent of this policy is to protect streams and riparian corridors that support fish and wildlife habitat.	Potentially Consistent. The proposed Gregg Ranch disposal facilities were located to avoid impacts to the onsite blue-line creek and adjacent sensitive habitat. Additional mitigation has been identified to further protect sensitive oak woodland habitat adjacent to the creek stream corridor. The proposed force main pipeline corridor intersects five drainage features. Mitigation measures have been recommended to reduce the impact to the maximum extent feasible.
Biological Resources Policy BR 4.5 Encourage Stream Preservation on Private Lands Encourage private landowners to protect and preserve stream corridors in their natural state and to restore stream corridors that have been degraded.	The intent of this policy is to preserve stream corridors on privately owned lands.	Potentially Consistent. The proposed project components on the Gregg Ranch disposal site were located to avoid impacts to the onsite blue-line creek. The proposed force main pipeline corridor intersects five drainage features, and mitigation measures have been recommended to reduce the impact on them to the maximum extent feasible.
Archeological Resources Policy CR 4.2 Protection of Native American Cultural Sites Ensure protection of archaeological sites that are culturally significant to Native Americans, even if they have lost their scientific or archaeological integrity through previous disturbance. Protect sites that have religious or spiritual value, even if no artifacts are present. Protect sites that contain artifacts, which may have intrinsic value, even though their archaeological context has been disturbed.	The intent of this policy is to project archeological sites that are culturally significant to Native Americans.	Potentially Consistent. The project area was surveyed for sensitive archaeological and cultural resources and survey results were negative in the proposed areas of disturbance. Additional mitigation has been identified to further minimize the potential for impacts related to inadvertent discovery of sensitive cultural resources, including cultural resource awareness training for all construction personnel, archaeological monitoring, and inadvertent discovery protocol. Tribal consultation was conducted in accordance with Assembly Bill 52.
Archeological Resources Policy CR 4.4 Development Activities and Archaeological Sites Protect archaeological and culturally sensitive sites from the effects of development by avoiding disturbance where feasible. Avoid archaeological resources as the primary method of protection.	The intent of this policy is to protect archaeological and culturally sensitive sites from the effects of development primarily by avoiding existing resources where feasible.	Potentially Consistent. The project area was surveyed for sensitive archaeological and cultural resources and survey results were negative in proposed areas of disturbance. Additional mitigation has been identified to further minimize the potential for impacts related to inadvertent discovery of sensitive cultural resources, including cultural resource awareness training for all construction personnel, archaeological monitoring, and inadvertent discovery protocol.

Goals, Policies, Plans, Programs and Standards	Intent of the Policy in Relation to Avoiding or Mitigating Significant Environmental Impacts	Preliminary Consistency Determination
Energy Policy E 1.3 Renewable energy and County facilities Seek to use renewable energy to power County facilities.	The intent of this policy is to seek out renewable energy sources to power County facilities.	Potentially Consistent. Energy demands of the proposed project would be minimal and would not inhibit continued use of renewable energy use by the County.
Energy Policy E 1.4 Methane Increase the use of methane as an energy source from wastewater treatment plants and active and inactive, closed landfills.	The intent of this policy is to increase the use of methane as an energy source from WWTPs and closed landfills.	Potentially Inconsistent. The proposed project does not propose the capture or use of methane gas as a source of renewable energy.
Energy Policy E 2.1 Energy efficiency Become a model of energy efficiency and conservation in the provision of services and the maintenance of County facilities and equipment to: a. demonstrate to County residents and businesses the benefits of energy efficiency and conservation, b. reduce costs of government, c. reduce dependence on imported fossil fuel energy, and d. improve air quality.	The intent of this policy is to emphasize energy efficiency and conservation in the design and maintenance of County facilities.	Potentially Consistent. Energy demands of the proposed project would be minimal and would not inhibit continued use of renewable energy use by the County.
Energy Policy E 2.2 Energy consumption Decrease energy consumption at all County facilities by 20% using 2006 as a baseline year.	The intent of this policy is to decrease energy usage by County facilities.	Potentially Consistent. The proposed project is an expansion of an existing facility, but energy demand increases will be negligible and would not inhibit continued decreases in County energy use in the most feasible way.
Energy Policy E 3.3 Use of renewable energy for water and wastewater Promote the use of renewable energy systems to pump and treat water and wastewater.	The intent of this policy is to promote the use of renewable energy as sources to pump and treat wastewater.	Potentially Consistent. Energy demands of the proposed project would be minimal and would not inhibit continued use of renewable energy use by the County.
Open Space Policy OS 1.7 Open space resource protection Protect open space resources by guiding development away from rural areas to more suitable areas.	The intent of this policy is to promote the conservation of open space resources by locating development in areas more suited for development.	Potentially Consistent. The only proposed project component proposed within an Open Space designation is the optional sludge pond location within the existing WWTF. This use would not be inconsistent or substantially increase public utility facilities uses within the WWTF or detract from other open space resources in the vicinity.
Soil Resources Policy SL 1.1 Prevent Loss of Topsoil in All Land Uses Minimize the loss of topsoil by encouraging broad-based cooperation between property owners, agricultural operators, agencies, and organizations that will lead to effective soil conservation practices on all lands, including County-controlled properties.	The intent of this policy is to effectively conserve topsoil.	Potentially Consistent. The proposed project would not result in a substantial loss of topsoil. The topsoil above the proposed lift station and force main pipeline would be restored and project components on the Gregg Ranch disposal site would balance material onsite and reuse any removed topsoil for construction of earthen berms.

Goals, Policies, Plans, Programs and Standards	Intent of the Policy in Relation to Avoiding or Mitigating Significant Environmental Impacts	Preliminary Consistency Determination
Soil Resources Policy SL 1.2 Promote Soil Conservation Practices in All Land Uses Require erosion and sediment control practices during development or other soil-disturbing activities on steep slopes and ridgelines. These practices should disperse stormwater so that it infiltrates the soil rather than running off, and protect downslope areas from erosion.	The intent of this policy is to ensure appropriate stormwater design practices during development or other soil-disturbing activities.	Potentially Consistent. The proposed project would not result in a substantial loss of topsoil. Mitigation has been recommended to ensure loss of topsoil would be avoided and/or minimized, including through the preparation and implementation of drainage, erosion control and sedimentation, and stormwater pollution prevention plans.
Implementation Strategy SL 1.2.1 Retain natural vegetation and topography Retain natural vegetation and topography to the maximum extent feasible for all discretionary projects adjacent to blue line streams or in areas designated with at least moderate erosion potential.	The intent of this policy is to retain natural vegetation and topography surrounding blue-line streams to the maximum extent possible.	Potentially Consistent. Mitigation has been identified to ensure project-related impacts to natural vegetation and sensitive habitat areas, including reconfiguration of the proposed spray field to avoid oak woodland and sagebrush scrub. The proposed force main pipeline would cross five drainage features, and mitigation measures have been recommended to reduce potential adverse impacts to these features.
Soil Resources Policy SL 3.1 Conserve Important Agricultural Soils Conserve the Important Agricultural Soils mapped in Figure SL-1 and listed in Table SL-2. Proposed conversion of agricultural lands to non-agricultural uses shall be evaluated against the applicable policies in this COSE and in the Agriculture Element, including policies such as Policies AGP 18 and AGP 24.	The intent of this policy is to conserve the important agricultural soils mapped in Figure SL-1.	Potentially Consistent. The proposed project would convert Prime Farmland, Farmland of Statewide Importance, and Other Productive Soils to non-agricultural use. However, the proposed project would not substantially affect historic or current agricultural uses at the project site. Grazing uses could continue to be accommodated at the spray field area, as feasible.
Visual Resources Policy VR 2.1 Develop in a manner compatible with Historical and Visual Resources Through the review of proposed development, encourage designs that are compatible with the natural landscape and with recognized historical character, and discourage designs that are clearly out of place within rural areas.	The intent of this policy is to encourage designs that are compatible with the natural landscape and historical character of the area.	Potentially Consistent. The proposed spray field and storage ponds at Gregg Ranch would be largely compatible with surrounding rural land uses and consistent with the historic rural agricultural land use in the vicinity.
Water Quality Control Plan for the Central Coastal Basin (Basin Plan) – 2017 Edition		
4.6.2.5 SALINAS RIVER HYDROLOGIC UNIT Dischargers in the Nacimiento Reservoir area include San Luis Obispo County Service Area No. 7A, Oak Shores Development (0.1 mgd); and, San Luis Obispo County Service Area No. 19, Heritage Ranch Development (0.40 mgd). Wastewater facilities for the Oak Shores Development consist of two aerated treatment ponds and spray disposal. Part of the collection system is located below the spillway elevation of Nacimiento Reservoir. This has been a source of excessive infiltration in the past and the problem has	The intent of this policy is to prevent contamination of the Nacimiento Reservoir.	Potentially Consistent. The County proposes to implement improvements to the existing WWTP to improve capacity and to improve the quality of treated effluent. Proposed sludge drying beds would be located within the existing WWTF; however, all other disposal facilities would be located well away from Nacimiento Lake and would satisfy required setback requirements. The proposed project is an improvement to the existing WWTP and expansion of the existing disposal facilities, not a new treatment facility.

Goals, Policies, Plans, Programs and Standards	Intent of the Policy in Relation to Avoiding or Mitigating Significant Environmental Impacts	Preliminary Consistency Determination
been corrected. This area should be watched closely as reservoir level rises and wastewater flows increase to insure infiltration and/or exfiltration do not reoccur. Major expansion of wastewater facilities is expected in the future. As the development grows, new disposal facilities should be relocated well away from Nacimiento Lake.		

3.4 CUMULATIVE STUDY AREA

3.4.1 CEQA Requirements

Section 15355 of the State CEQA Guidelines defines "cumulative impact" as two or more individual effects that, when considered together, are considerable or will compound other environmental impacts. Cumulative impacts are changes in the environment that result from the incremental impact of development of the proposed project and all other nearby "related" projects. For example, the traffic impacts of two projects in close proximity may be insignificant when analyzed separately, but could have a significant impact when the projects are analyzed together.

State CEQA Guidelines Section 15130 indicates that cumulative impacts shall be discussed when they are significant. The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as much detail as is provided for the effects attributable to the project alone. The discussion should be guided by the standards of practicality and reasonableness. The State CEQA Guidelines state the following:

> *"Cumulative impacts include either option:*
>
> 1. *A list of past, present, and probable future projects producing related or cumulative impacts, including those projects outside the control of the agency, or*
>
> 2. *A summary of projections contained in an adopted general plan or related planning document or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area wide conditions contributing to the cumulative impact. Any such planning document shall be referenced and made available to the public at a location specified by the Lead Agency (Section 15130 (b)(1)).*"

The discussion shall also include a summary of the expected environmental effects to be produced by those projects with specific reference to additional information stating where that information is available, and a reasonable analysis of the cumulative impacts of the relevant projects. An EIR shall examine reasonable options for mitigating or avoiding any significant cumulative effects of a proposed project.

3.5 CUMULATIVE DEVELOPMENT SCENARIO

For the purposes of this SEIR, a list of past, present, and reasonably anticipated future projects will be used for the cumulative analysis (State CEQA Guidelines Section 15130, Option 1).

The County Planning and Building Department reported there are no recently completed, under construction, recently approved or pending approval projects within the project vicinity. Given the rural nature of the project area, no specific cumulative projects exist that could cumulatively contribute to potentially significant impacts. Therefore, the cumulative development scenario assumes a reasonably foreseeable amount of growth in the project area, given historic growth and allowable land use designations.

For purposes of this SEIR, the cumulative development scenario consists of widely scattered rural residential development consistent with the growth pattern observed over the last 10 to 20 years, along with incremental development of residences within the Oak Shores and Heritage Ranch communities. Based on these assumptions, cumulative impacts are assessed in Chapter 4, Environmental Impact Analysis, under each resource issue.

CHAPTER 4. ENVIRONMENTAL IMPACT ANALYSIS

This chapter of the Supplemental Environmental Impact Report (SEIR) evaluates the potential of the proposed project to result in significant impacts to the environment as a result of construction, operation, and maintenance of the proposed project. This section of the SEIR provides a full scope of environmental analysis in conformance with the California Environmental Quality Act (CEQA) Guidelines. The following environmental resources are assessed in this chapter in accordance with Section 15163 and Appendix G of the State CEQA Guidelines (refer to Table 4-1).

Table 4-1. Summary of Environmental Impacts Analysis

Environmental Resource	Less than Significant Impacts	Significant, but Mitigable Impacts	Significant, Unavoidable, Adverse Impacts
Aesthetic Resources		X	
Agriculture and Forest Resources	X		
Air Quality/Greenhouse Gas Emissions		X	
Biological Resources		X	
Cultural Resources		X	
Land Use and Planning		X	

Each issue area analyzed in the Environmental Impact Analysis chapter of this SEIR has been divided into subsections, as follows:

Existing Conditions: The description of the physical environmental conditions in the vicinity of the project, as they exist at the time the Notice of Preparation (NOP) is published (baseline physical conditions).

Regulatory Setting: The regulations in force at the time the NOP is published. These are the applicable regulations governing each environmental topic, such as the Clean Air Act and its requirements for maintaining air quality. This is not an exhaustive analysis of the regulations, but rather information to assist the reader in understanding the potential impacts of the project from a regulatory perspective.

Thresholds of Significance: The thresholds used to evaluate each environmental topic are usually based on Appendix G of the State CEQA Guidelines, or are standard procedures related to existing regulations or are standards in the industry.

Impact Assessment and Methodology: Methodology used to determine the impacts associated with the project, such as measurements or field investigative processes.

Project-Specific Impacts and Mitigation Measures: These include the significant environmental effects of the proposed project, as further defined below. The impacts are identified and are then followed by the mitigation measures that can minimize significant impacts; mitigation measures must be enforceable and feasible. Where more than one mitigation measure could be used to reduce a significant effect, each should be discussed and rationale given for determining the preferable mitigation measure. In addition, there must be an essential nexus between the mitigation measure and a legitimate governmental interest, and the mitigation measure also must be "roughly proportional" to the impacts of the project.

Residual Impacts: The statement of the level of impact, significant or insignificant, that is residual once mitigation is applied.

Cumulative Impacts: The cumulative effects of the project when the project's effect is cumulatively considerable.

Secondary Impacts: If a mitigation measure would cause one or more significant effects in addition to those that would be caused by the project as proposed, the effects of the mitigation measure must be discussed but in less detail than the significant effects of the project as proposed. (*Stevens v. City of Glendale* (1981) 125 Cal.App.3d 986).

All residual impacts in the EIR have been classified according to the following criteria (note: CEQA does not recognize a beneficial effect as an impact):

Class I – Significant, unavoidable, adverse impacts: Significant impacts that cannot be fully and effectively mitigated. No measures could be taken to avoid or reduce these adverse effects to insignificant or negligible levels.

Class II – Significant, but mitigable impacts: These impacts are potentially similar in significance to those of Class I, but can be reduced or avoided by the implementation of mitigation measures.

Class III – Less than significant impacts: Mitigation measures may still be required for these impacts as long as there is rough proportionality between the environmental impacts caused by the project and the mitigation measures imposed on the project.

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

4.1 AESTHETICS

This section of the SEIR identifies and evaluates potential adverse impacts to visual (aesthetic) resources as a result of the proposed project. Resources used in developing this section include field visits and review of project maps and drawings, similar disposal facilities, and various data records available to the public, including planning documents. Mitigation measures have been recommended to reduce potentially significant impacts identified in this section. County of San Luis Obispo (County) Public Works Department projects are exempt from Title 22 (refer to the discussion in Section 3.3.1). However, Title 22 requirements were used in this section as guidance in identification of sensitive visual resources, evaluation of impacts, and development of mitigation measures.

4.1.1 Existing Conditions

4.1.1.1 Regional Setting

The proposed project site is located within and adjacent to the Oak Shores village area, on the north shore of the Nacimiento Reservoir, approximately 14 miles west of U.S. Route 101 (U.S. 101) and 30 miles northwest of the city of Paso Robles. The visual character of the area consists of primarily rural and grazing lands and undeveloped open space, with recreational areas and the Nacimiento Reservoir to the south. Topography in the area generally includes rolling to steep slopes within the Santa Lucia Range. Tierra Redonda Mountain is a notable geological landmark in the project vicinity, located north of the Oak Shores village area and south of the proposed Gregg Ranch disposal site. The broad table-top mountain peaks at approximately 2,060 feet (628 meters) above sea level and encompasses approximately 1,300 acres, with 320 surrounding acres of Bureau of Land Management (BLM) ownership (County of San Luis Obispo 2014).

4.1.1.2 Gregg Ranch Project Site

The proposed Gregg Ranch disposal site would be located north of Lynch Canyon Road approximately 0.25 mile west of Interlake Road. The visual setting of the disposal site and surrounding areas is rural agriculture with widely scattered rural residences. In addition to surrounding rural agricultural uses, there is a small communications facility approximately 0.1 mile north of the proposed spray field and a surface mining operation approximately 0.3 mile east of the proposed spray field, just east of Interlake Road. An unnamed blue-line creek and adjacent blue oak woodland habitat extends in an east/west direction near the northern boundary of the Gregg Ranch site. Gregg Ranch is located within the Agriculture land use category and has flat to gently sloping topography. Surrounding undeveloped lands are within the Agriculture and Rural Lands land use categories.

Gregg Ranch is visible from surrounding public roadways, including Interlake Road, a state-designated scenic highway, and Lynch Canyon Road, a scenic rural roadway. The County includes the Interlake Road scenic corridor in its Sensitive Resources Area (SRA) combining designation map unit (Figure 4.1-1, below). This SRA designation extends approximately 300 feet from the centerline of Interlake Road from Nacimiento Lake Drive to the County's northern boundary. No portion of the Gregg Ranch disposal site directly borders Interlake Road; however, a small portion of the northeast corner of the proposed Gregg Ranch disposal site is within the Interlake Road SRA corridor (see Figure 4.1-1). Heading north, views of the disposal site from Interlake Road are entirely blocked by mature vegetation adjacent to the creek, which runs approximately 100 to 300 feet west of and adjacent to Interlake Road east of the proposed disposal site. Views heading south are also almost entirely obscured by existing vegetation, topography, and distance; however, small gaps in the vegetation surrounding the creek provide short glimpses into the site beyond for limited durations (1 to 3 seconds) along Interlake Road.

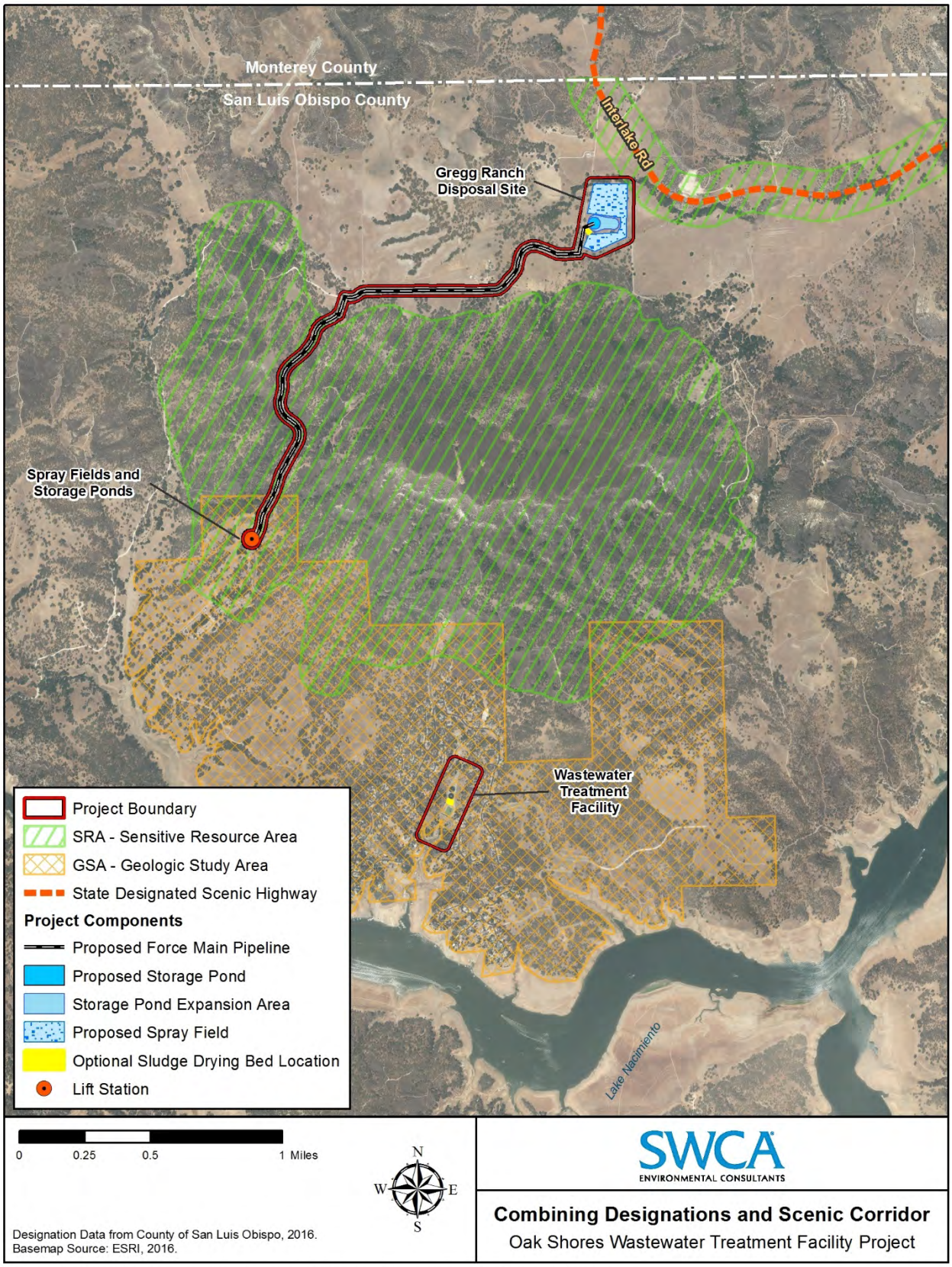


Figure 4.1-1. Combining designations map.

Lynch Canyon Road is not an officially dedicated scenic roadway, but it is a scenic rural road that borders the southern portion of the proposed disposal site. Views of the site from Lynch Canyon Road are intermittently blocked by existing mature oak trees and vegetation immediately south of the proposed disposal site (Figures 4.1-2 and 4.1-3) but are unobstructed from areas to the east at distances ranging between 200 and 900 feet (Figure 4.1-4).

Figure 4.1-2. View of Gregg Ranch from the southwest corner of the proposed disposal site near Lynch Canyon Road, facing northeast. Photo taken March 31, 2016.

Figure 4.1-3. View of Gregg Ranch from near Lynch Canyon Road, facing north. Photo taken on March 31, 2016.

Figure 4.1-4. View of Gregg Ranch from the southeast corner of the proposed disposal site near Lynch Canyon Road, facing northeast. Photo taken on March 31, 2016.

4.1.1.3 Lift Station and 2.0-Mile Force Main Site

The proposed lift station would be located adjacent to the existing spray field and storage pond location directly west of Oak Shores Drive within the Oak Shores village reserve area. The existing spray field and storage pond area is located within the Residential Single Family land use category. The area surrounding this portion of the project site is undeveloped, moderate to steeply sloping, and generally supports oak woodland and grassland (Figures 4.1-5 and 4.1-6).

Figure 4.1-5. View of the existing spray field from near Oak Shores Drive. Photo taken on March 31, 2016.

Figure 4.1-6. View of the existing storage pond from near Oak Shores Drive. Photo taken on March 31, 2016.

The proposed 2.0-mile-long force main pipeline would extend from the existing spray field and storage pond location along the western edge of the County's Oak Shores Drive right-of-way and the northern edge of the County's Lynch Canyon Road right-of-way to connect to the proposed disposal facilities at Gregg Ranch. The topography along these road rights-of-way ranges from flat (predominantly along Lynch Canyon Road; Figure 4.1-7) to steeply sloping (predominantly along Oak Shores Drive; Figure 4.1-8), and supports non-native grassland, oak woodland, bigberry manzanita chaparral, purple needlegrass grassland, and ruderal habitat. The proposed pipeline would extend through the following land use categories: Residential Single Family, Agriculture, and Commercial Retail (see Figure 4.6-1 in Section 4.6, Land Use and Planning). Both the proposed lift station and portions of the force main pipeline are within the Tierra Redonda Mountain SRA (see Figure 4.1-1).

Figure 4.1-7. View of Lynch Canyon Road heading east along the force main pipeline route. Photo taken on May 28, 2016.

Figure 4.1-8. View of Oak Shores Drive heading south along the force main pipeline route. Photo taken on March 31, 2016.

4.1.1.4 New Sludge Drying Beds

The new sludge drying beds are proposed to be located at either the existing wastewater treatment facility (WWTF) or at Gregg Ranch. The existing WWTF is located in an area designated as Open Space. Surrounding ridgelines support single-family residential development, and the topography steeply slopes down to the treatment plant area. Vegetation outside of the developed WWTF consists of dense oak woodland and scrub. Views down to the existing WWTF are limited from public roadways on surrounding ridgelines, due to the steep downward slopes and intervening private residential developments. The WWTF site slopes down toward the Nacimiento Reservoir to the south; views of the facility from the reservoir are obscured by intervening topography and vegetation.

If placed on the Gregg Ranch site, the new sludge drying beds would be located near the proposed storage ponds and spray fields (refer to the previous setting description of Gregg Ranch).

4.1.2 Regulatory Visual Setting

This section identifies the federal, state, and local laws, statutes, guidelines, and regulations that govern the identification and treatment of aesthetic resources as well as the analysis of potential impacts to aesthetic resources. The proposed project is located within the jurisdiction of the County. Although County Public Works Department projects are exempt from Title 22 Land Use Ordinance (LUO) requirements, Title 22 requirements were used in this section as guidance in identifying sensitive visual resources, evaluating impacts, and developing mitigation. Therefore, the regulatory setting pertaining to visual resources includes review of the proposed development's consistency with various elements of the County of San Luis Obispo General Plan and LUO, in addition to the review of findings made in this document per State CEQA Guidelines.

4.1.2.1 Federal Policies and Regulations

No federal regulations governing visual or aesthetic resources apply to the Oak Shores WWTF upgrade.

4.1.2.2 State Policies and Regulations

4.1.2.2.1 CALIFORNIA ENVIRONMENTAL QUALITY ACT

CEQA establishes that it is the policy of the state to take all action necessary to provide the people of the state "with…enjoyment of aesthetic, natural, scenic and historic environmental qualities" (Public Resources Code [PRC] §21001(b)). The purpose of this SEIR is to analyze and disclose potential project-related environmental effects consistent with CEQA definitions and guidelines.

4.1.2.2.2 STATE SCENIC HIGHWAY PROGRAM

The California Department of Transportation (Caltrans) manages the State Scenic Highway Program, provides guidance, and assists local government agencies, community organizations, and citizens with the process to officially designate scenic highways (Caltrans 2008). One roadway within the project vicinity, Interlake Road, is officially designated as a state scenic highway (see Figure 4.1-1). As such, its corridor (defined as the area of land roughly adjacent to and visible from the highway) is subject to protection and regulation with respect to land use, site planning, advertising, earthmoving, landscaping, and design. The Gregg Ranch project site is approximately 0.25 mile west of Interlake Road.

The State Scenic Highway Program requires the local governing body to develop and adopt protection measures in the form of ordinances, zoning, and/or planning policies that apply to the area of land within the scenic corridor. The five legislatively required elements of corridor protection are:

1) Regulation of land use and density of development (i.e., density classifications and types of allowable land uses),
2) Detailed land and site planning (i.e., permit or design review authority and regulations for the review of proposed developments),
3) Control of outdoor advertising (i.e., prohibition of off-premise advertising signs and control of on-premise advertising signs),
4) Careful attention to and control of earthmoving and landscaping (i.e., grading ordinances, grading permit requirements, design review authority, landscaping and vegetation requirements), and
5) The design and appearance of structures and equipment (i.e., design review authority and regulations for the placement of utility structures, microwave receptors, wireless communication towers, etc.).

4.1.2.3 Local Policies and Regulations

4.1.2.3.1 COUNTY OF SAN LUIS OBISPO GENERAL PLAN

Land Use Element, Sensitive Resource Areas

The proposed 2.0-mile-long force main pipeline and lift station are within the County of San Luis Obispo Tierra Redonda SRA combing designation mapping unit. The objectives for SRAs are identified in the County's Land Use Element:

- **Objective 1.** Buildings and structures should be designed and located in harmonious relationships with surrounding development and the natural environment.
- **Objective 2.** Buildings, structures and plant materials should be constructed, installed or planted to avoid unnecessary impairment of scenic views.
- **Objective 3.** Potentially unsightly features should be located to be inconspicuous from streets, highways, public walkways and surrounding properties; or effectively screened from view.
- **Objective 4.** Natural topography, vegetation and scenic features of the site should be retained and incorporated into proposed development.
- **Objective 5.** Buildings and non-farm structures on agricultural property should be located to cause the least possible conflict with agricultural production by siting them away from the productive agricultural land, while still protecting to the greatest extent possible the scenic and environmental quality of the sensitive resource area.

Conservation and Open Space Element

The Conservation and Open Space Element (COSE) is a tool to protect and preserve unique community resources, including majestic natural landmarks, outstanding scenic vistas, important wildlife habitats, diverse natural communities, unique historic and cultural resources, vibrant lakes and creek corridors, dynamic coastal and marine environments, clean air, and bountiful soils. The County has developed the following goals regarding scenic resources:

- **Goal VR1.** The natural and agricultural landscape will continue to be the dominant view in rural parts of the county.

- **Goal VR 2.** The natural and historic character and identity of rural areas will be protected.
- **Goal VR 3.** The visual identities of communities will be preserved by maintaining rural separation between them.
- **Goal VR 4.** Protect visual resources within visual sensitive resource areas (SRAs) for scenic corridors.
- **Goal VR 5.** Views from scenic vistas and vista points will be protected.
- **Goal VR 6.** A cohesive visual character will be maintained in urban areas.
- **Goal VR 7.** Views of the night sky and its constellations of stars will be maintained.
- **Goal VR 8.** Visual intrusions of signs will be minimized within public view corridors.
- **Goal VR 9.** The visual effects of utility lines will be minimized.

4.1.2.3.2 COUNTY OF SAN LUIS OBISPO INLAND LAND USE ORDINANCE (TITLE 22)

Chapter 22.14.110 – Sensitive Resource Area (SRA)

The proposed 2.0-mile-long force main pipeline and lift station are within the County of San Luis Obispo Tierra Redonda SRA combing designation mapping unit. The SRA combining designation is applied to areas of the county with special environmental qualities, or areas containing unique or endangered vegetation or habitat resources. The purpose of these combining designation standards is to require that proposed uses be designed with consideration of the identified sensitive resources, and the need for their protection.

4.1.3 Thresholds of Significance

The determinations of significance of project impacts are based on applicable policies, regulations, goals, and guidelines defined by CEQA and the County. In addition to comparing the project to relevant policies and standards, the aesthetic resources analysis identifies which specific criteria contribute most to the existing quality of each view and if change would occur to that criteria as a result of the project. If a change in visual criteria was identified, this change was analyzed for its potential effect on the existing scenic character. This analysis was combined with the potential number of viewers, their sensitivities, and viewing duration in order to determine the overall level of impacts. Specifically, the project would be considered to have a significant effect on visual/aesthetic resources if the effects exceed the significance criteria described below:

a. Create an aesthetically incompatible site open to public view.
b. Introduce a use within a scenic view open to public view.
c. Change the visual character of the area.
d. Create glare or night lighting, which may affect surrounding areas.
e. Impact unique geological or physical features.

Each threshold is discussed under Section 4.1.5, Project-Specific Impacts and Mitigation Measures, below.

4.1.4 Impact Assessment and Methodology

This analysis of impacts on aesthetic resources examines the temporary and permanent effects of the proposed project based on the application of the significance criteria described above. Visual impact analysis focused on the identification of sensitive visual resources in the project area, and assessment of the potential changes in those resources that would result from development of the project. Surrounding public viewing areas from which the project site would be visible were identified, and a general description of the visual character of the area was developed. Potential changes in the existing visual setting, including potential viewshed blockage or an alteration in community character, were compared to the thresholds described above to determine whether particular sensitive resources would be impacted.

The impact analysis is based on field observations conducted by SWCA Environmental Consultants (SWCA) staff, review of project maps and drawings, analysis of aerial and ground-level photographs, and review of a variety of data available in public records, including local planning documents. The potential visual changes resulting from the proposed project components are described below.

4.1.5 Project-Specific Impacts and Mitigation Measures

4.1.5.1 Create an Aesthetically Incompatible Site Open to Public View

The proposed lift station and 2.0-mile-long force main pipeline would be subsurface and not open to public view. Visual impacts during construction would be short term, and areas of disturbance would be restored to existing conditions at the completion of construction. Therefore, potential impacts would be less than significant. The potential sludge drying bed location within the existing WWTF would be located within the existing fenced wastewater facility, between existing storage and biolac processing ponds, and would not be aesthetically incompatible with existing uses or views. Therefore, potential impacts related to these components would be less than significant.

The new disposal facilities proposed at Gregg Ranch would introduce new components within the rural agricultural setting that would be visible from sections of Lynch Canyon Road, Interlake Road, and surrounding private agricultural parcels. Proposed components include sprinklers (up to 100 sprinklers at a height of 3 to 4 feet), earthen berms, and site fencing and signage. These components would be similar to proximate agricultural uses from an aesthetic perspective. The proposed disposal facilities are generally rural in nature (i.e., earthen berms, ponds, and grassy spray fields) and no construction of any significant built structures is proposed at Gregg Ranch. The proposed sprinklers would be similar to agricultural irrigation facilities and the site can support grazing when sprinklers are not in operation. However, similar to the existing spray field and pond location, the development of sprinklers, geometric (square-cornered) berms, and ponds in very close proximity to adjacent public roadways can create views incompatible with surrounding open space and/or natural habitat and non-intensive agricultural uses in adjacent areas (see Figures 4.1-5 and 4.1-6).

The proposed spray fields would be highly visible to viewers travelling along Lynch Canyon Road, particularly south and southeast of the disposal site. The sprinklers, berms, ponds, and sludge drying beds (if located at Gregg Ranch) would introduce a new visually incompatible use within that area, a potentially significant impact. The Gregg Ranch disposal site currently supports substantial mature oak trees and vegetation in the southernmost portion of the site adjacent to Lynch Canyon Road. The proposed footprint of the spray field would require the removal of these mature oak trees and vegetation in close proximity to Lynch Canyon Road, providing unobstructed views to the disposal site, which would extend to within close proximity (approximately 60 feet) to Lynch Canyon Road. Given the scenic rural nature of the area, this is considered a potentially significant impact.

Mitigation has been identified to reduce potential impacts to less than significant. Mitigation measure AES/mm-1.1 requires the project applicant to preserve mature oak trees and vegetation adjacent to Lynch Canyon Road. Implementation of this measure would retain an existing visual buffer adjacent to Lynch Canyon Road, which would effectively distance viewers and screen views of the proposed disposal site from the public roadway. Preservation of existing mature vegetation would provide additional visual screening of the proposed disposal site components, set back the proposed visual components a greater distance from Lynch Canyon Road, and help maintain the project site's existing visual character. Preservation of the mature oak trees and vegetation would also help mitigate impacts associated with tree removal as described in Section 4.4.6, Project-Specific Impacts and Mitigation Measures, of Section 4.4, Biological Resources. AES/mm-1.2 would ensure site fencing is compatible with existing views.

Implementation of AES/mm-1.1 would result in a reduced spray field footprint of approximately 12.04 acres, which would still be adequate to meet the project objectives of accommodating existing commitments and additional approved parcels within Oak Shores Tract 2162 Phases II–VI and providing a location for expanded facilities that could accommodate future buildout of Oak Shores (a total of 801 additional units). Reducing the size of the spray field and storage pond at Gregg Ranch is feasible if the existing spray field and storage pond location on Oak Shores Drive remains in operation.

Upon implementation of AES/mm-1.1, aesthetically incompatible proposed spray field components would be set back from Lynch Canyon Road between 100–500 feet and screened by mature oak trees and vegetation. With implementation of this measure, residual impacts would be less than significant. Figure 4.1-9 shows the location of the visual screening boundary, within which oak trees and vegetation would be preserved and no spray field components would be allowed. Figures 4.1-10 and 4.1-11 provide an example of how vegetation screening and distance at the existing spray field and pond location effectively reduce potential visual impacts.

Construction of the Gregg Ranch disposal site would also introduce new visual components to the otherwise undeveloped rural viewshed (including construction vehicles, equipment and materials, stockpiles, and exposed soils), resulting in a temporary adverse impact to visual resources. Potential construction-related impacts would be short term and limited in nature and duration. Therefore, potential construction-related impacts would be less than significant.

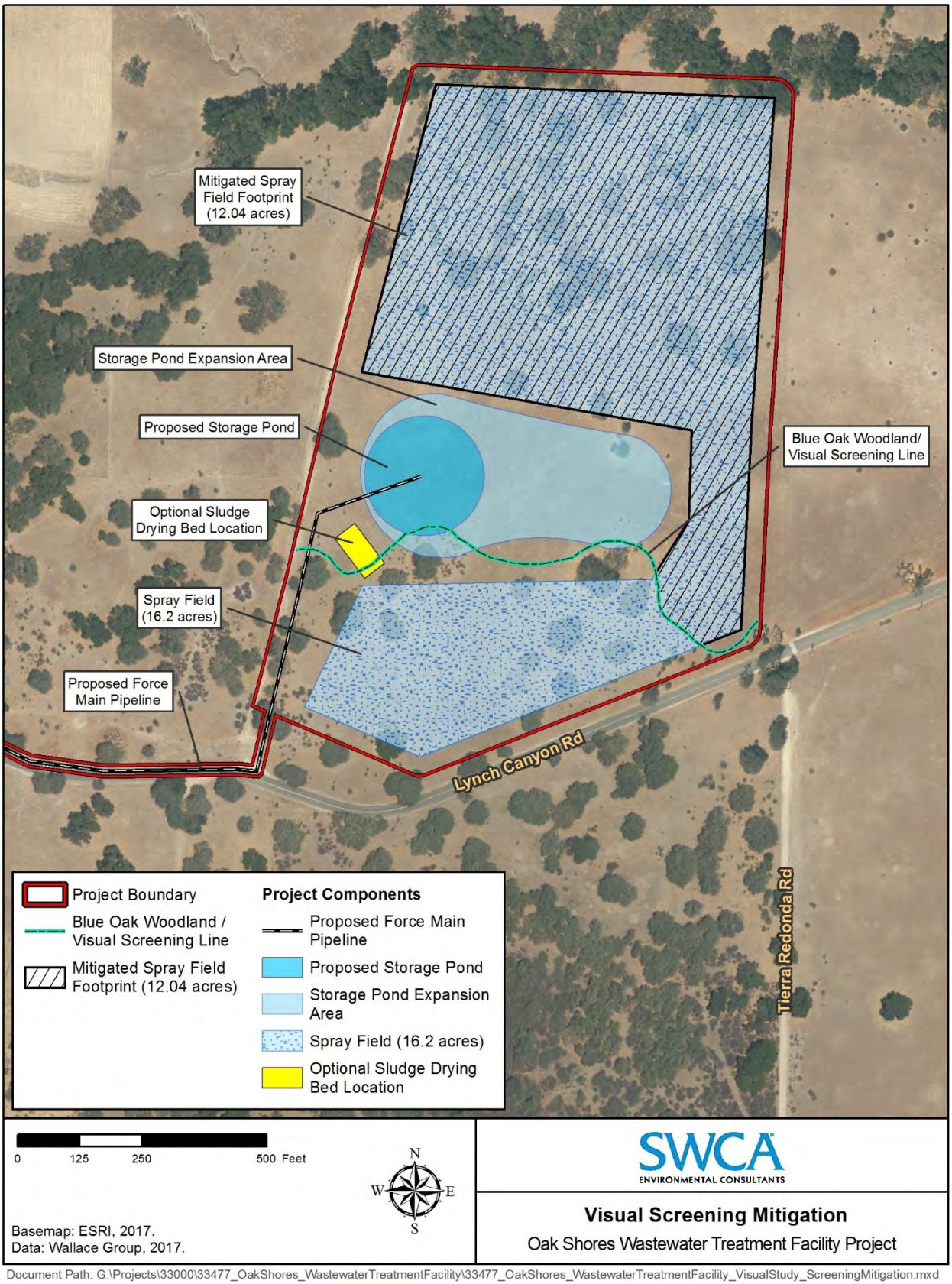


Figure 4.1-9. Proposed Gregg Ranch disposal site with visual screening area.

Figure 4.1-10. View of the existing spray field and storage pond from Oak Shores Drive at a distance of approximately 300 feet. Photo taken on May 28, 2016.

Figure 4.1-11. View of the existing spray field and storage pond from Oak Shores Drive at a distance of approximately 100 feet. Photo taken on March 31, 2016.

AES Impact 1	
Proposed development could create an aesthetically incompatible site visible from public roadways, resulting in a potentially significant, long-term impact *(Class II, less than significant with mitigation)*.	
Mitigation Measures	
AES/mm-1.1	*Prior to approval of improvement plans, the applicant shall redesign the footprint of the proposed Gregg Ranch disposal site to retain mature oaks and vegetation between Lynch Canyon Road and the visual screening line shown in Figure 4.1-9. The spray field, storage pond, and sludge drying bed location shall be relocated outside of the visual screening area. Construction of the force main pipeline shall be sited to avoid removal of mature trees and vegetation in the visual screening area.* *The redesigned disposal site shall be shown on all applicable project plans prior to construction.*
AES/mm-1.2	*Prior to approval of improvement plans, any proposed fencing and signage at the Gregg Ranch disposal site shall be clearly shown on project plans, including the proposed location and style of fencing and signs. Fencing type shall be the same as that currently utilized at the existing spray field and storage pond location (barbed wire with steel T-post and/or wooden supports) or another fencing type that is consistent with the rural setting (i.e., similar to fences and gates in areas surrounding Gregg Ranch). Signage shall be the minimum amount and size required for safety purposes.* *The redesigned disposal site shall be shown on all applicable project plans prior to construction.*
Residual Impacts	
With implementation of the above measures, this impact would be considered less than significant.	

4.1.5.2 Introduce a Use within a Scenic View Open to the Public

The proposed lift station and force main pipeline would be subsurface, and the proposed sludge drying beds at the existing WWTF would not introduce a new use at that location. These components are also located within the village reserve line (VRL) for Oak Shores, a private gated community. The existing spray field and storage pond location and existing WWTF are not open to the public. Therefore, potential impacts associated with these components would be less than significant.

The proposed project would introduce new uses at the proposed Gregg Ranch disposal site. Gregg Ranch is located within a scenic rural area open to the public and would be visible from Lynch Canyon Road, Interlake Road, and surrounding private parcels. Interlake Road is an officially designated state scenic highway; however, views of the site from Interlake Road would be almost entirely obscured by existing mature oak trees and vegetation along an existing drainage that runs between the proposed disposal area and the roadway. In areas where the disposal site can be seen from Interlake Road, views of the new components would be minimal due to the limited size and type of built structures, distance, and existing vegetation in the fore- and mid-ground. The project would not affect views within the Tierra Redonda Mountain SRA.

Views of the site from Lynch Canyon Road would be unobstructed and in close proximity, similar to views of the existing spray field and storage pond location from Oak Shores Drive (see Figures 4.1-5 and 4.1-6). Mitigation has been identified to reduce potential impacts associated with the introduction of a new use in this scenic rural setting, including preservation of mature trees and vegetation adjacent to Lynch Canyon Road and siting the proposed spray field, storage pond, and sludge drying bed to provide a larger setback and greater distance from Lynch Canyon Road. With implementation of these measures, potential impacts would be less than significant.

AES Impact 2
Proposed development would introduce new uses within a scenic rural agricultural area, resulting in a potentially significant, long-term impact *(Class II, less than significant with mitigation)*.
Mitigation Measures
Implement AES/mm-1.1 and AES/mm-1.2
Residual Impacts
With implementation of these measures, residual impacts would be less than significant.

4.1.5.3 Change the Visual Character of the Area

Project-related actions would be considered to have a significant impact on the visual character of the site if they altered the area in a way that significantly changed, detracted from, or degraded the visual quality of the site or was inconsistent with community policies regarding visual character. The proposed lift station and force main pipeline would be subsurface and would not affect long-term visual character. The proposed sludge drying bed location at the existing WWTF would be compatible and consistent with existing uses at the plant location and would not change the visual character of the WWTF. Therefore, potential impacts associated with these components would be less than significant.

The proposed Gregg Ranch disposal site would involve the removal of multiple mature oak trees and the introduction of new public utility uses and infrastructure in a rural agricultural area. The proposed disposal site would introduce uses that are similar to more intensive agricultural uses (e.g., earthen berms, fencing, ponds, pipelines, irrigation); however, the project vicinity is less developed and generally supports open space, grazing, and oak woodland habitat.

Mitigation has been identified to reduce visual impacts associated with the Gregg Ranch disposal site, including through the retention of existing mature vegetation to provide visual screening of the disposal site and siting proposed disposal facilities to provide an increased buffer and distance from Lynch Canyon Road. With implementation of these measures, views of the proposed Gregg Ranch disposal site would be screened from almost all public locations, except views from Lynch Canyon Road heading west toward the project site. The proposed spray field, storage pond, and sludge drying bed location would be seen from this location for approximately 10 seconds at distances ranging between approximately 1,000 to 100 feet as the viewer approaches the site. The visible components of the disposal site (i.e., sprinklers, ponds, and sludge drying beds) would be surrounded by earthen berms to ensure flows do not leave the site. The earthen berms would shield views of these components from Lynch Canyon Road, reducing visual effects. Additional mitigation has been identified to ensure the earthen berms are designed and constructed to maintain the existing rural visual character of the project site. With implementation of these measures, potential impacts would be less than significant.

AES Impact 3	
The proposed Gregg Ranch disposal site would change the visual character of the area resulting in a potentially significant, long-term impact *(Class II, less than significant with mitigation)*.	
Mitigation Measures	
AES/mm-3.1	*Prior to approval of improvement plans, any proposed earthen berms at the Gregg Ranch disposal site shall be clearly shown on project plans, including the proposed location, size, height, and design of each berm. Proposed berms shall be designed to match the natural landscape and shall not include angular (squared) edges or corners. The exterior slopes of proposed earthen berms shall be revegetated to match surrounding areas.* *The location and type of earthen berms shall be shown on all applicable project plans prior to construction.*
Implement AES/mm-1.1 and AES/mm-1.2	
Residual Impacts	
With implementation of these measures, residual impacts would be less than significant.	

4.1.5.4 Create Glare or Night Lighting

The project does not propose installation or addition of new lighting. Similar to the existing spray field and storage pond location, no lighting would be required at the proposed Gregg Ranch disposal site. No new lighting at the existing WWTF or existing spray field and storage pond location would be required to accommodate installation of the proposed lift station, force main pipeline, or sludge drying beds.

The development of new ponds and sprinklers would not create a substantial source of glare. Although these components are moderately reflective, they would not generate substantial sources of glare or focused light, particularly when screened and set back from public viewpoints as required by AES/mm-1.1 and AES/mm-1.2. Therefore, potential impacts would be less than significant.

4.1.5.5 Impact Unique Geological or Physical Features

The lift station, force main pipeline, and sludge drying beds at the existing WWTF would be located within existing wastewater treatment facilities and road shoulders and would not impact unique geological or physical features. The most prominent physical features at the proposed Gregg Ranch disposal site include the mature stands of oak trees and blue oak woodland adjacent to the existing drainage in the northern portion of the site. Although considered a sensitive scenic resource, the oak trees that are dominant in the surrounding area are not considered unique to the project site. In addition, mitigation has been identified that would require the project applicant to locate the proposed disposal facilities to protect mature oaks and vegetation adjacent to Lynch Canyon Road, which would preserve the most visibly prominent natural features of the site. The project would not impact the unique ecological habitats associated with the Tierra Redonda SRA. Therefore, potential impacts would be less than significant.

4.1.6 Cumulative Impacts

The cumulative section addresses how this project may contribute to a change in visual quality in relation to other existing and reasonable future development in the area (per State CEQA Guidelines Section 15130).

There are no known past, present, or reasonably foreseeable future projects in the immediate project vicinity; therefore, the cumulative development scenario generally assumes widely scattered rural residential development in the project vicinity. Future residential development in Oak Shores and surrounding areas in the county would expand rural residential uses in the project vicinity. Although the amount of rural residential uses would increase, this development would be consistent with existing visual character and use of the area and would not create substantially incompatible uses within the viewshed, create new uses within scenic views, or change the visual character of the area (which is currently widely scattered rural residential). Cumulative development in the project vicinity will incrementally reduce the amount of oak woodland; however, given the dominance of this habitat and the low demand for residential development in areas within the viewshed of Gregg Ranch, potential cumulative loss of oak trees and habitat would be less than significant.

The cumulative impacts of widely scattered rural residential development in the project area would not result in impacts to visual resources that, when considered with the effects of the proposed project, would result in potentially significant cumulative impacts. Therefore, potential cumulative impacts would be less than significant.

4.2 AGRICULTURAL RESOURCES

This section analyzes potential impacts to agricultural resources that would be caused by implementation of the proposed project. This includes the direct or indirect conversion of agricultural soils to non-agricultural uses, conflicts with Agricultural zoning or Williamson Act contracts, dust and other incompatible land use impacts, and potential impacts to other agricultural resources, including water supplies, farm support services, and infrastructure. Resources used in developing this section include U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) soils data, aerial photographs, and the San Luis Obispo County Department of Agriculture (SLOCDA) 2016 Annual Report.

4.2.1 Existing Conditions

4.2.1.1 Regional Agricultural Setting

In 2016, the total value of agricultural production in San Luis Obispo County was approximately $914 million. This equates to a 10% increase over 2015 values, despite ongoing and cumulative drought impacts.

In San Luis Obispo County, vegetable production occurs primarily in the coastal valleys, while irrigated field crops (mostly alfalfa and irrigated pasture) are predominate in the interior valleys. Expansion of vineyards over land previously used for dry farm grain production has been significant over the last 20 years. Vineyards occur mostly on gently rolling land east of Paso Robles, west of Templeton and Paso Robles, and in the Edna Valley. Avocados, lemons, and some other subtropical fruits are grown in the coastal foothills. Production of high value nursery stock and crop seed has also steadily increased, including propagation of fruit and nut trees and vegetable seedlings, as well as the production of cut flowers and ornamental trees and shrubs (SLOCDA 2017).

Grazing lands account for a large percentage of privately owned land in the county (County of San Luis Obispo 2010a). Grazing lands typically consist of rolling and steep hills with between 30 and 75 percent slopes. Cattle ranching is the predominant use on these lands. Property sizes generally range from 100 acres to thousands of acres, depending on the carrying capacity of the rangelands (County of San Luis Obispo 2010a).

4.2.1.1.1 FARMLAND CONVERSION

The California Department of Conservation (CDOC) utilizes the Farmland Mapping and Monitoring Program (FMMP) to track the conversion of farmland to other uses in the state. The 2012–2014 California Farmland Conversion Report reports that important farmland in California decreased by more than 16 square miles (10,706 acres) between 2012 and 2014. Farmland of Local Importance comprised 100% of the loss. The highest-quality agricultural soils, known as Prime Farmland, increased by 128 acres.

The CDOC also utilizes the FMMP to track conversion of farmland to other uses at the County level. The 2014 field report is the most recent update for San Luis Obispo County. The total conversion of lands, to non-agricultural uses or otherwise, within the county between 2012 and 2014 is shown in Table 4.2-1, below.

Table 4.2-1. San Luis Obispo County Farmland Conversion 2012–2014

Agricultural Land Use Category	Total Acreage Inventoried		2012–2014 Acreage Changes			
	2012	2014	Acres Lost	Acres Gained	Total Changed	Net Changed
Prime Farmland	40,862	40,990	879	1,007	1,886	128
Farmland of Statewide Importance	20,884	21,908	518	1542	2,060	1,024
Unique Farmland	39,982	43,225	629	3,872	4,501	3,243
Farmland of Local Importance	304,410	289,301	16,767	1,666	18,433	-15,101
IMPORTANT FARMLAND SUBTOTAL	*406,138*	*395,432*	*18,793*	*8,087*	*26,880*	*-10,706*
Grazing Land	1,183,072	1,189,777	2,552	9,257	11,809	6,705
AGRICULTURAL LAND SUBTOTAL	*1,589,210*	*1,585,209*	*21,345*	*17,344*	*38,689*	*-4,001*
Urban and Built-up Land	45,576	49,509	93	4,026	4,119	3,933
Other Land	244,034	244,104	492	562	1,054	70
Water Area	8,780	8,778	2	0	2	-2
TOTAL AREA INVENTORIED	**1,887,600**	**1,887,600**	**21,932**	**21,932**	**43,864**	**0**

Source: California Department of Conservation, Division of Land Resource Protection, California Farmland Conversion Report 2012–2014.

4.2.1.2 U.S. Department of Agriculture Natural Resources Conservation Service Soil Classifications

The NRCS assesses the potential agricultural productivity and limitations of different soils by utilizing both the land capability classification (LCC) system and the Important Farmland Inventory. The LCC system classifies soil units based on their capability to produce commonly cultivated crops and pasture plants without deteriorating over a long period of time. The system is subdivided into capability class and capability subclass. Capability classes range from I to VIII (1 to 8), with soils having the slightest limitations to agricultural use receiving the highest ratings (Class I).

The NRCS Important Farmland Inventory is an inventory of the prime and unique farmland of the nation, as well as an inventory of farmland of statewide and local importance developed in consultation with the appropriate state or local agency. Its purpose is to identify the extent and location of important rural lands needed to produce food, feed, fiber, forage and oilseed crops.

Based on the NRCS Important Farmland Inventory criteria, states prepare and maintain a current list of soil survey map units that meet the criteria for farmland. In California, this is done by the CDOC FMMP.

4.2.1.3 California Department of Conservation Classification

The CDOC Division of Land Resource Protection developed the FMMP in 1984 to analyze impacts to California's agricultural resources. Land designations include the following categories:

- **Prime Farmland (P):** Farmland with the best combination of physical and chemical features able to sustain long-term agricultural production. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields. Land must have been used for irrigated agricultural production at some time during the 4 years prior to the mapping date.

- **Farmland of Statewide Importance (S):** Farmland similar to Prime Farmland but with minor shortcomings, such as greater slopes or less ability to store soil moisture. Land must have been used for irrigated agricultural production at some time during the 4 years prior to the mapping date.
- **Unique Farmland (U):** Farmland of lesser quality soils used for the production of the state's leading agricultural crops. This land is usually irrigated, but may include non-irrigated orchards or vineyards as found in some climatic zones in California. Land must have been cropped at some time during the last 4 years prior to the mapping date.
- **Farmland of Local Importance (L):** Land of importance to the local agricultural economy as determined by each county's board of supervisors and a local advisory committee. In San Luis Obispo County, Farmland of Local Importance is defined as areas that meet all the characteristics of Prime Farmland or Farmland of Statewide Importance with the exception of irrigation. Additional farmlands of Local Importance include dryland field crops of wheat, barley, oats, and safflower.
- **Farmlands of Local Potential (LP):** San Luis Obispo County also developed an additional category of Farmlands of Local Importance to classify lands having the potential for farmland, which have Prime or Statewide characteristics but are not cultivated. These lands are considered Farmlands of Local Potential.
- **Grazing Land (G):** Land on which the existing vegetation is suited to the grazing of livestock.
- **Urban and Built-Up Land (D):** Land occupied by structures with a building density of at least one unit to 1.5 acres, or approximately six structures to a 10-acre parcel. This land is used for residential, industrial, commercial, construction, institutional, public administration, railroad and other transportation yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, water control structures, and other developed purposes.
- **Other Land (X):** Land not included in any other mapping category. Common examples include low-density rural developments; brush, timber, wetland, and riparian areas not suitable for livestock grazing; confined livestock, poultry, or aquaculture facilities; strip mines or borrow pits; and water bodies smaller than 40 acres. Vacant and nonagricultural land surrounded on all sides by urban development and great than 40 acres is mapped as Other Land.
- **Water (W):** Perennial water bodies with an extent of at least 40 acres.

FMMP designations are shown in Figure 4.2-1.

The Gregg Ranch disposal site includes Grazing Land and Farmland of Local Potential. The proposed pipeline would be placed within the existing rights-of-way of Lynch Canyon Road and Oak Shores Drive, which encompasses Grazing Land and Farmland of Local Potential. The existing WWTF site consists 100% of Urban and Built-up Land.

The Storie Index is a widely accepted method of rating soils for agricultural potential in California, which has been used for over 50 years. The Revised Storie Index is generated digitally from the NRCS National Soil Information System. Since 2005, the NRCS has published Storie Index ratings generated by the Revised Storie Index method (Table 4.2-2). Ratings are generated solely from soil characteristics, including a wide range of soil profile and landscape characteristics such as soil depth, surface texture, subsoil conditions, drainage, salinity, erosion, and topography.

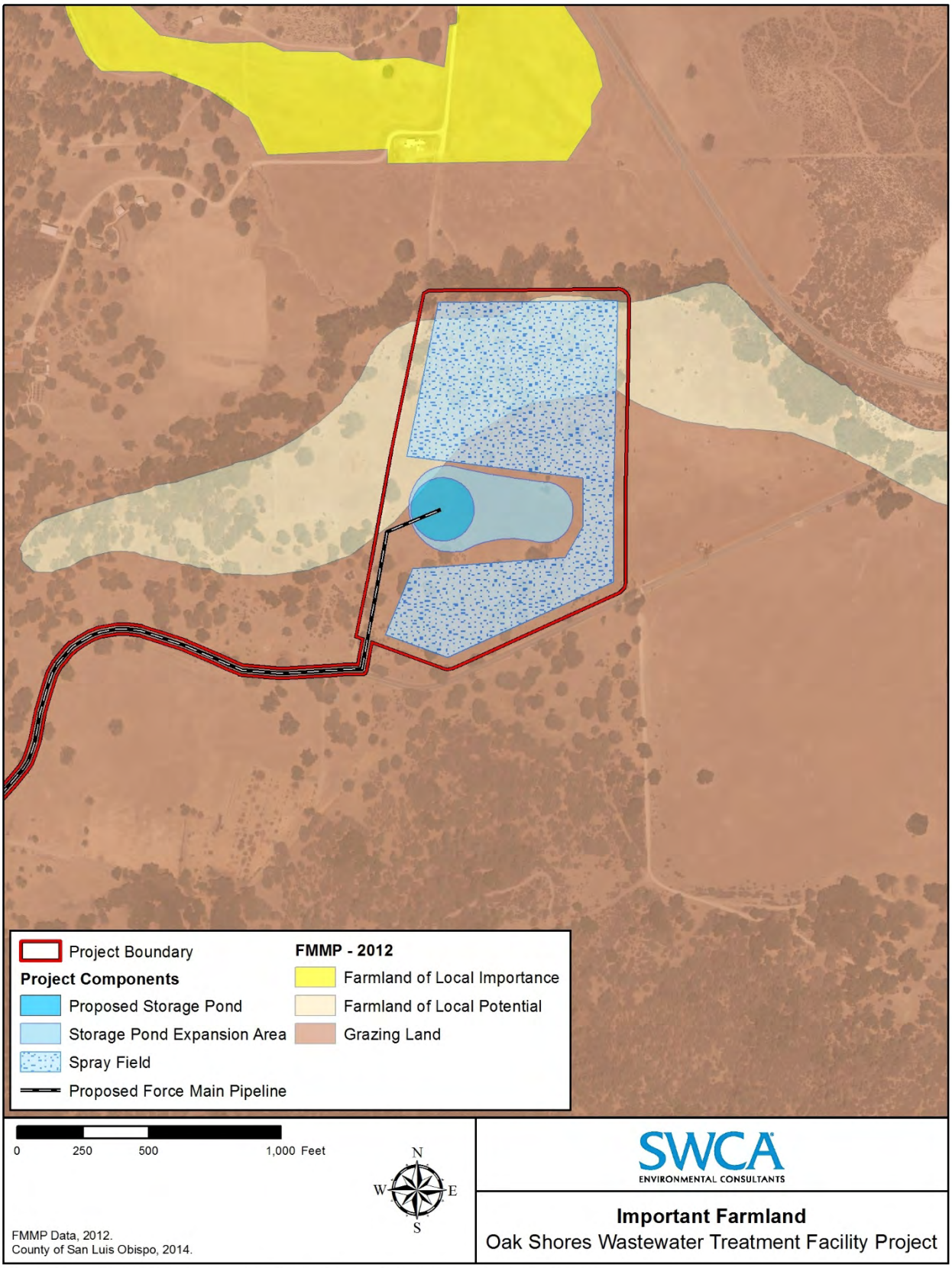


Figure 4.2-1. Gregg Ranch disposal site Farmland Mapping and Monitoring Program map.

Table 4.2-2.Revised Storie Index Ratings

Grade	Storie Index Rating	Definition
1	80 – 100	Excellent – very minor or no limitations that restrict use of general agricultural use
2	60 – 80	Good – suitable for most crops, but have minor limitations that narrow the choice of crops and may require some special management practices
3	40 – 60	Fair – suited to fewer crops or to special crops and require careful management
4	20 – 40	Poor – limited to a narrow range of crops and require special management for intensive agriculture
5	10 – 20	Very Poor – generally not suited to cultivated crops but can be used for pasture and range
6	Less than 10	Non-agricultural – not suited to agricultural use

Source: USDA Soil Conservation Service, Soil Survey of San Luis Obispo County, Coastal Part (1984)

4.2.1.4 Local Agricultural Setting

The majority of lands in the project vicinity are generally located along the western slopes of the Santa Lucia Mountains and is designated Agriculture (approximately 36,049 acres). However, the area in the vicinity of Lake Nacimiento is generally too dry and hilly for good productivity. The primary agricultural uses are grazing and dry farming. Most properties in the project vicinity are in large holdings except in the area east of Bee Rock Road where parcels of 40 acres are common. The amount of rainfall strongly influences yields of dry farm grain and hay and the growth of range grasses in different areas of the county. Most grain and hay is produced in areas of moderate rainfall such as the north-central part of the county. Open hillsides on the northerly Santa Lucia Range are best suited for grazing. A majority of the outlying portions of the Nacimiento sub-area are classified as Rural Lands and support limited grazing. These lands also serve as a watershed for Lake Nacimiento. Other Rural Lands in the Nacimiento subarea are less rugged, but poor soils and lack of water limit agricultural activities; parcels remain in large ownerships and have not experienced any substantial development. There are no Agriculture or Rural Lands land use designations in the Village of Oak Shores.

The proposed Gregg Ranch disposal site is currently undeveloped and zoned Agriculture. Gregg Ranch is designated Farmland of Local Importance and Grazing Land in the FMMP and is also subject to a Williamson Act contract (Figure 4.2-2). Lands surrounding the Gregg Ranch disposal site are classified as Agriculture and Rural Lands and are also subject to Williamson Act contracts.

The proposed Gregg Ranch disposal site is surrounded by dry farming lands and grazing lands. A ranch with active dry farming and grazing is located approximately 1,500 feet west of the Gregg Ranch disposal site. The area located directly northwest of Gregg Ranch is zoned Rural Lands and includes the Rancho Dos Amantes Farm and Bed and Breakfast as well as dry farm land.

The 2.0-mile-long force main pipeline would be installed along the northern portion of the County's Lynch Canyon Road right-of-way and the western portion of the Oak Shores Drive right-of-way. Both roads are bordered by lands within the Agricultural land use classification and under Williamson Act contract. The new sludge drying beds are proposed to be located at either the existing WWTF or at Gregg Ranch. The existing WWTP is located in an area designated Open Space and is surrounded by residential uses.

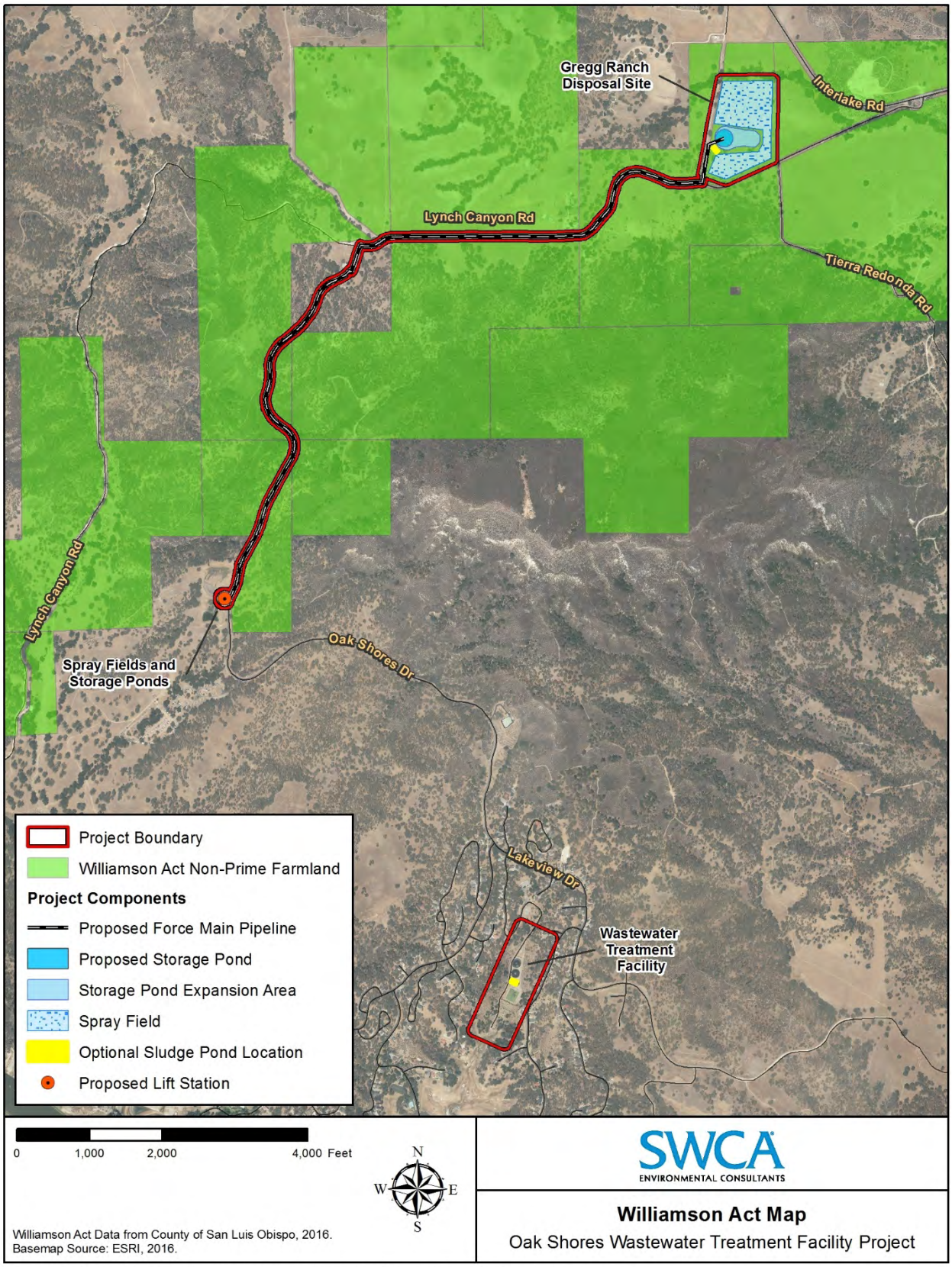


Figure 4.2-2. Parcels within the project vicinity under a Williamson Act contract.

4.2.1.5 Onsite Soils

Geology and topography are key factors in the formation of soils and the use of land for cropland or grazing. The usability of soils for crops depends on their depth, drainage, texture, and water-holding capacity. The best soils for crops normally occur on flat or gently sloping lowlands. Soil erosion is generally a problem on moderate to steep slopes. More than 50% of San Luis Obispo County has slopes exceeding 30%, which generally can be used only for grazing.

The various soils found on the project site are classified as Farmland of Statewide Importance, Prime Farmland if Irrigated, and Not Prime Farmland by the USDA NRCS. These soil types are described below. This information is summarized from the USDA Soil Conservation Service's Soil Survey of San Luis Obispo County, California (Coastal Part) (1984). Gregg Ranch soil types and their agricultural characteristics are summarized in Table 4.2-3.

Table 4.2-3. Gregg Ranch Soil Types and Classifications

Map Unit	Class		CA Revised Stories Index Grade	NRCS Farmland Classification
	Irrigated	Non-irrigated		
148. Hanford and Greenfield fine sandy loams, 2–9% slope	2e	4e	Grade 1 (Excellent)	Farmland of Statewide Importance
174. Mocho clay loam, 2–9% slope	2e	4e	Grade 1 (Excellent)	Prime if Irrigated
189. Rincon clay loam, 9–15% slope	3e	4e	Grade 2 (Good)	Not Prime
196. San Ysidro sandy loam, 2–9% slope	3s	4s	Grade 3 (Fair)	Not Prime

Sources: Soil Survey of San Luis Obispo County, California Coastal Part,(USDA Soil Conservation Service 1984); Web Soil Survey (USDA NRCS 2018).

4.2.2 Regulatory Setting

4.2.2.1 Federal Policies and Regulations

There are no applicable federal agricultural policies that pertain to the proposed project.

4.2.2.2 State Policies and Regulations

4.2.2.2.1 CALIFORNIA LAND CONSERVATION ACT (WILLIAMSON ACT)

As defined by Government Code 51200 et seq., the California Land Conservation Act of 1965 (Williamson Act) enables local governments to enter into contracts with private landowners for the purpose of restricting specific parcels of land to agricultural or related open space use. As an incentive for this voluntary program, landowners receive lower property tax assessments based on agricultural or open space land uses, as opposed to the to the unrestricted value of the land. Until recently, local governments have received a subvention to replace a portion of forgone property tax revenues from the state via the Open Space Subvention Act of 1971. However, due to recent state budget issues, subvention payments have declined or been eliminated in recent years. Based on the County Assessor's parcel database at the

end of 2015, San Luis Obispo County had over 785,000 acres in Land Conservation Contracts, which is 36% of the total acreage in the county.

The entire Gregg Ranch parcel (approximately 160 acres) is currently under a Williamson Act contract. As proposed, the proposed disposal site would impact approximately 25 acres of the 160-acre parcel that is under a Williamson Act contract. In addition, several adjacent parcels located immediately east, south, and west of this portion of the project site are also under Williamson Act contract. The proposed 2.0-mile-long pipeline would be installed along the existing Oak Shores Drive and Lynch Canyon Road rights-of-way. Several segments of the Oak Shores Drive and Lynch Canyon Road rights-of-way extend through lands that are under Williamson Act contracts (refer to Figure 4.2-2). The existing WWTF parcel is not under a Williamson Act contract. Uses allowed on land under a Williamson Act contract must meet the County LUO requirements, County Rules of Procedure to Implement the California Land Conservation Act of 1965, and the principles of compatibility outlined in the Land Conservation Act (California Government Code Section 51200 et seq.).

4.2.2.3 Local Policies and Regulations

4.2.2.3.1 COUNTY OF SAN LUIS OBISPO GENERAL PLAN

Agriculture Element

The Agriculture Element of the San Luis Obispo County General Plan (separated from the Open Space Element in May 2010) provides a background on agricultural resources within the county. Through the goals, policies, implementation programs, and measures provided within the document, the County's goal is to "identify those areas of the county with productive farms, ranches and soils, and establish goals, policies and implementation measures that will enable their long-term stability and productivity." Of the policies in the Agriculture Element, several are directly applicable to the proposed project. Please refer to Table 3 1, Consistency with Plans and Policies, in Chapter 3, Environmental Setting, for a discussion of these policies as they relate to this project.

Conservation and Open Space Element

The County has combined information from these various state and federal sources into a single definition of Important Agricultural Soils of San Luis Obispo County in its COSE of the General Plan (San Luis Obispo County 2010b). The COSE is based on the principles of smart growth, with the intent to preserve unique or valuable natural resources, to manage development within the sustainable capacity of the county's resources, and to reduce the county's contribution to global climate change. The COSE consists of a policy and program document and a technical appendix. The policy and program document includes a chapter that specifically addresses soils, which identifies resource management goals, policies, and strategies that preserve and protect soil resources from degradation or loss by wind and water erosion, preserve and protect watershed function and ecological health through soil conservation, and protect agricultural soils from conversion to urban and residential uses. Several policies of the COSE are directly applicable to the project. Please refer to Table 3 1, Consistency with Plans and Policies, for a discussion of these policies as they relate to this project.

4.2.2.3.2 SAN LUIS OBISPO COUNTY RIGHT-TO-FARM ORDINANCE

The San Luis Obispo County "Right-to-Farm" Ordinance states that the use of real property for agricultural operations is a high priority and favored use. Ordinance No. 2561, added Chapter 5.16 to Title 5 of the San Luis Obispo County Code relating to Agricultural Lands, Operations, and the Right to Farm. Paragraph "b" of Section 5.16.020 (Findings and Policy) states:

> *"Where non-agricultural land uses occur near agricultural areas, agricultural operations frequently become the subjects of nuisance complaints due to lack of information about such operations. As a result, agricultural operators may be forced to cease or curtail their operations. Such actions discourage investments in farm improvements to the detriment of agricultural uses and the viability of the County's agricultural industry as a whole."*

The right-to-farm ordinance advises purchasers of residential and other property types adjacent to existing agricultural operations of the inherent potential problems associated with the purchase of such property. Concerns may include the noise, odors, dust, chemicals, smoke, and hours of operation that may accompany agricultural operations.

4.2.3 Thresholds of Significance

Consistent with CEQA Guidelines Appendix G, the County states that a significant agriculture and forest resources impact would occur if the project would:

a. Convert prime agricultural land, per NRCS soil classification, to non-agricultural use;

b. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use;

c. Impair agricultural use of other property or result in conversion to other uses; or,

d. Conflict with existing zoning for agricultural use, or Williamson Act program.

4.2.4 Impact Assessment and Methodology

Impacts to agricultural resources were assessed utilizing data and maps published by the USDA, CDOC, and SLOCDA, including soil information, farmland mapping, and economic data. The project was analyzed for the potential conversion of Prime Farmland, loss of productive agricultural soils, incompatible land uses, and inconsistencies with regulations and policies intended to preserve agricultural resources.

The analysis of agricultural effects included a review of Geographic Information Systems (GIS) maps, state and local literature and records, and field visits to the project site and the surrounding region. A number of GIS layers provided by the County were utilized to determine soil types and identify parcels within and adjacent to the project study area that were part of agricultural preserves. These layers were joined with the project study area layer to determine precisely how much farmland might be impacted either permanently or temporarily by the components of the proposed project.

4.2.5 Project Specific Impacts and Mitigation Measures

4.2.5.1 Conversion of Prime Agricultural Land Per NRCS Soil Classification

Based on the NRCS Web Soil Survey, on-site soils' farmland classifications are provided in Table 4.2-3. Mocho clay loam and Rincon clay loam were identified as Prime Farmland (if irrigated) within the Gregg Ranch disposal site and along the force main pipeline, respectively. Mocho clay loam is located in the northeast corner of the Greg Ranch disposal site containing substantial numbers of mature oak trees and vegetation. Per mitigation measure BIO/mm-2.6, the proposed spray field would be reconfigured to avoid this area to mitigate for loss of oak woodland habitat (see BIO/mm-2.6 and Figure 4.4-7). Therefore,

prime soils would be located outside the pond expansion area and mitigated spray field footprint and no potential impacts to this soil unit would occur.

Rincon clay loam is mapped along the force main pipeline, less than 0.5 mile southwest of the Greg Ranch disposal area, on Lynch Canyon Road. This soil is within the road right-of-way and was previously disturbed during construction of the road. Pipeline installation in disturbed road shoulder areas would cause no impact. None of the soils located within the remaining project area are considered Prime Farmland. Therefore, potential impacts related to conversion of prime agricultural land per NRCS soil classification would be less than significant (Class III). No mitigation measures would be necessary.

4.2.5.2 Conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance

According to the CDOC FMMP, no portion of the project area contains Prime Farmland, Unique Farmland, or Farmland of Statewide Importance . Therefore, potential impacts related to conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance would be less than significant (Class III). No mitigation measures would be necessary.

4.2.5.3 Impairment of Agricultural Use of Other Property

The proposed lift station would be located subsurface and on the same site as existing spray field and storage ponds. The proposed force main pipeline would also be subsurface, and it would be located primarily within the existing disturbed, rights-of-way along Oak Shores Drive and Lynch Canyon Road. Proposed uses on the Gregg Ranch disposal site would not have the potential to impair agricultural practices on adjacent parcels because the proposed spray fields would be compatible with non-intensive adjacent agricultural areas, would not increase demand on agricultural water supplies or facilities, and would not indirectly affect other proximately agricultural support facilities. Potential impacts related to impairment of agricultural use of other property would be less than significant (Class III). No mitigation measures would be necessary.

4.2.5.4 Agricultural Zoning and Williamson Act Compliance

The Gregg Ranch disposal site is located on a parcel within the Agriculture Land Use Category and is currently under a Williamson Act contract (see Figure 4.2-2). Based on the County of San Luis Obispo Rules of Procedure to Implement the California Land Conservation Act of 1965, pipelines and public utility facilities are allowable uses within inland area parcels covered by a Williamson Act contract (County of San Luis Obispo 2015). Because the proposed pipeline and wastewater disposal site components would be allowable uses under the Williamson Act contract, no cancellation of the contract would be required prior to project development and operation.

The proposed disposal facilities would be centrally located within the 160-acre Gregg Ranch site and would not adversely affect adjacent agricultural uses or Williamson Act contracted parcels. The project would not substantially increase water demand or demands on other agricultural support facilities that could indirectly affect surrounding agricultural uses and Williamson Act lands. Proposed storage ponds would be high-density polyethylene (HDPE) lined, and the entire disposal site would be surrounded by an earthen berm to prevent offsite runoff; therefore, degradation of agricultural soils would not occur. Almost the entire length of the 2.0-mile-long force main pipeline would extend through Williamson Act contracted lands; however, pipelines are an allowable use under the Williamson Act contracts and the County's rules of procedure to implement the Williamson Act and pipeline installation in disturbed road shoulder areas would cause a negligible impact on Williamson Act contracted lands and adjacent

agricultural uses. Therefore, potential impacts associated with conflicts with agricultural zoning and Williamson Act contract would be less than significant (Class III).

4.2.6 Cumulative Impacts

There are no known past, present, or reasonably foreseeable future projects in the project vicinity; therefore, the cumulative development scenario includes widely scattered rural residential development in surrounding areas consistent with past and future projected growth patterns. Cumulative development in the project vicinity would slightly increase the density of residential uses within the rural agricultural area, and each project would have the potential to convert prime agricultural soils, indirectly affect agricultural resources and services, and/or conflict with agricultural zoning or Williamson Act contracts. The proposed project would not convert any prime agricultural soils and potential indirect impacts would be negligible and would not constitute a considerable contribution to a potentially significant cumulative impact. Cumulative residential development would be consistent with the general growth patterns anticipated for this area and potential impacts to agricultural resources would be limited due to the type and nature of cumulative development. Therefore, potential cumulative impacts to agricultural resources would be less than significant (Class III).

This page intentionally left blank.

4.3 AIR QUALITY AND GREENHOUSE GAS EMISSIONS

The following section describes the existing air quality setting in San Luis Obispo County and the potential short- and long-term air quality and greenhouse gas (GHG)-related impacts associated with development of the proposed project.

GHG emissions were not an issue that was evaluated under CEQA when the 2008 Oak Shores WWTP EIR was prepared; there was no previous analysis of the project's potential impacts associated with GHG emissions in the 2008 EIR. Therefore, unlike the other sections in Chapter 4 of this SEIR, this section provides an analysis of potential air quality and GHG-related impacts as a result of the whole project, including components that were analyzed in 2008 and have not changed. This analysis includes potential impacts related to the following project components (refer also to Table 2-2, Project Components):

- **Existing treatment plant upgrade:** new headworks, upgrade aerated lagoon system, retrofit stabilizing ponds, convert aeration basins to sludge-holding and digestion ponds, construct new pump station;
- **Gregg Ranch disposal site:** new storage pond and spray field;
- **Lift station and force main pipeline:** new lift station at existing spray field and 2.0-mile-long force main pipeline to Gregg Ranch disposal site;
- **Sludge drying beds:** new sludge drying beds at the existing treatment plant and/or Gregg Ranch; and
- **Sewer collection system:** various sewer collection system improvement alternatives.

Emission rates were generated using standard emission factors and the California Emission Estimator Model (CalEEMod) modeling program, as applicable. CalEEMod data sheets and other emission calculations are included in the Air Quality and GHG Emissions appendix (Appendix B). This analysis provides a reasonable worst-case scenario of potential air and GHG emissions resulting from construction and operation of the project and recommends mitigation to reduce those impacts to a less-than-significant level where feasible.

4.3.1 Existing Conditions

4.3.1.1 Regional Setting

San Luis Obispo County is part of the South Central Coast Air Basin, which also includes Santa Barbara and Ventura Counties. The climate of the basin area is strongly influenced by its proximity to the Pacific Ocean. San Luis Obispo County constitutes a land area of approximately 3,316 square miles with varied vegetation, topography, and climate. From a geographical and meteorological standpoint, the county can be divided into three general regions: the Coastal Plateau, the Upper Salinas River Valley, and the East County Plain. Air quality in each of these regions is characteristically different, although the physical features that divide them provide only limited barriers to the transport of pollutants between regions. The proposed project is located within the Upper Salinas River Valley. Located in the northern one-third of the county, the Upper Salinas River Valley includes approximately 25% of the county's population. Historically, this region has experienced the highest ozone and particulate levels in the county. Transport of ozone precursors from the coastal plateau and from the San Joaquin Valley may contribute to this condition.

4.3.1.2 San Luis Obispo County Air Quality Monitoring

The county's air quality is measured by multiple ambient air quality monitoring stations, including one in Paso Robles, approximately 20 miles southeast of the project site (San Luis Obispo County Air Pollution Control District [SLOAPCD] 2017a). Air quality monitoring is rigorously controlled by federal and state quality assurance and control procedures to ensure data validity. Gaseous pollutant levels are measured continuously and averaged each hour, 24 hours a day. Particulate matter is monitored in two ways: PM_{10} (inhalable particulate matter 10 microns or less in size) and $PM_{2.5}$ (inhalable particulate matter 2.5 microns or less in size). Particulate pollutants are generally sampled by filter techniques for averaging periods of 3 to 24 hours. PM_{10} and $PM_{2.5}$ are sampled for 24 hours every sixth day on the same schedule nationwide.

4.3.1.3 San Luis Obispo County Existing Air Quality

The significance of a given pollutant can be evaluated by comparing its atmospheric concentration to federal and state air quality standards. These standards represent allowable atmospheric containment concentrations at which the public health and welfare are protected and include a factor of safety. In San Luis Obispo, ozone and fine particulate are the pollutants of main concern, since exceedances of state health-based standards for those pollutants are experienced in some areas of the county.

4.3.1.3.1 SAN LUIS OBISPO COUNTY ATTAINMENT STATUS

Table 4.3-1 summarizes the attainment status in San Luis Obispo County for the major criteria pollutants. The county is designated as a non-attainment area for the state ozone and PM_{10} standards.

Table 4.3-1. San Luis Obispo County Attainment Status

Pollutant	Averaging Time	California Standards****		Federal Standards****	
		Concentration	Attainment Status	Concentration	Attainment Status
Ozone (O_3)	1 Hour	0.09 ppm (180 µg/m^3)	Non-Attainment	–	Non-Attainment Eastern SLO County - Attainment Western SLO County***
	8 Hour	0.070 ppm (137 µg/m^3)		0.075 ppm (147 µg/m^3)	
Respirable Particulate Matter (PM10)	24 Hour	50 µg/m^3	Non-Attainment	150 µg/m^3	Unclassified*/ Attainment
	Annual Arithmetic Mean	20 µg/m^3		–	
Fine Particulate Matter (PM2.5)	24 Hour	No State Standard	Attainment	35 µg/m^3	Unclassified*/ Attainment
	Annual Arithmetic Mean	12 µg/m^3		15.0 µg/m^3	
Carbon Monoxide (CO)	8 Hour	9.0 ppm (10 mg/m^3)	Attainment	9 ppm (10 mg/m^3)	Unclassified*
	1 Hour	20 ppm (23 mg/m^3)		35 ppm (40 mg/m^3)	
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m^3)		–	
Nitrogen Dioxide (NO_2)	Annual Arithmetic Mean	0.030 (57 µg/m^3)	Attainment	0.053 ppm (100 µg/m^3)	Unclassified*
	1 Hour	0.18 ppm (330 µg/m^3)		–	
Sulfur Dioxide (SO_2)	Annual Arithmetic Mean	–	Attainment	0.030 ppm (80 µg/m^3)	Unclassified*
	24 Hour	0.04 ppm (105 µg/m^3)		0.14 ppm (365 µg/m^3)	
	3 Hour	–		0.5 ppm (1300 µg/m^3)**	
	1 Hour	0.25 ppm (655 µg/m^3)		–	
Lead*	30 Day Average	1.5 µg/m^3	Attainment	–	No Attainment Information
	Calendar Quarter	–		1.5 µg/m^3	
	Rolling 3-Month Average*	–		0.15 µg/m^3	
Visibility Reducing Particles	8 Hour	Extinction coefficient of 0.23 per kilometer – visibility of ten miles or more (0.07-30 miles or more for Lake Tahoe) due to particles when relative humidity is less than 70 percent. Method: Beta Attenuation and Transmittance through Filter Tape.	Attainment	No Federal Standards	
Sulfates	24 Hour	25 µg/m^3	Attainment		
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m^3)	Attainment		
Vinyl Chloride*	24 Hour	0.01 ppm (26 µg/m^3)	No Attainment Information		

*Unclassified (EPA/Federal definition): Any area that cannot be classified on the basis of available information as meeting or not meeting the national primary or secondary ambient air quality standard for that pollutant.

**Secondary Standard

*** San Luis Obispo County has been designated non-attainment east of the -120.4 degree Longitude line, in areas of SLO County that are south of latitude 35.45 degrees, and east of the 120.3 degree Longitude line, in areas that are north of latitude 35.45 degrees. Map of non-attainment area is available upon request from the APCD.

Attainment (EPA/Federal definition): Any area that meets the national primary or secondary ambient air quality standard for that pollutant. (CA definition): State standard was not exceeded during a three year period.

Non-Attainment (EPA/Federal definition): Any area that does not meet, or contributes to an area that does not meet the national primary or secondary ambient air quality standard for that pollutant. (CA definition): State standard was exceeded at least once during a three year period.

4.3.2 Regulatory Setting

4.3.2.1 Federal Policies and Regulations

Air quality protection at the national level is provided through the Clean Air Act (CAA), enacted in 1970 and significantly amended in 1990. These amendments represent the fifth major effort by the U.S. Congress to improve air quality. The federal CAA is generally less stringent than the California Clean Air Act (CCAA). However, unlike the California law, the CAA set statutory deadlines for attaining federal standards. The 1990 amendments added several new sections to the law, including requirements for the control of toxic air contaminants, reductions in pollutants responsible for acid deposition, development of a national strategy for stratospheric ozone and global climate protection, and requirements for a national permitting system for major pollution sources.

4.3.2.2 State Policies and Regulations

The CCAA was signed into law in September 1988. It requires all areas of the state to achieve and maintain the California ambient air quality standards by the earliest practicable date. These standards are generally more stringent than the federal standards; thus, emission controls to comply with the state law are typically more stringent than necessary for attainment of the federal standards. The CCAA requires that all APCDs adopt and enforce regulations to achieve and maintain the state ambient air quality standards for the area under its jurisdiction. Pursuant to the requirements of the law, the SLOAPCD adopted a Clean Air Plan (CAP) for its jurisdiction in 2001.

The California Global Warming Solutions Act of 2006 (Assembly Bill [AB 32], Health and Safety Code Section 38500 et seq.) requires the California Air Resources Board (CARB) to design and implement emission limits, regulations, and other measures. These will reduce, by 2020, statewide GHG emissions in a technologically feasible and cost-effective manner to 1990 levels (representing a 25% reduction).

By enacting Senate Bill [SB] 97 in 2007, California's lawmakers expressly recognized the need to analyze GHG emissions as a part of the CEQA process. SB 97 required the California Office of Planning and Research to develop, and the Natural Resources Agency to adopt, amendments to the State CEQA Guidelines addressing the analysis and mitigation of GHG emissions. Those State CEQA Guidelines amendments clarified several points, including the following:

- Lead agencies must analyze the GHG emissions of proposed projects and must reach a conclusion regarding the significance of those emissions. (See State CEQA Guidelines Section 15064.4.)
- When a project's GHG emissions may be significant, lead agencies must consider a range of potential mitigation measures to reduce those emissions. (See State CEQA Guidelines Section 15126.4(c).)
- Lead agencies must analyze potentially significant impacts associated with placing projects in hazardous locations, including locations potentially affected by climate change. (See State CEQA Guidelines Section 15126.2(a).)
- Lead agencies may significantly streamline the analysis of GHGs on a project level by using a programmatic GHG emissions reduction plan meeting certain criteria. (See State CEQA Guidelines Section 15183.5(b).)

CEQA mandates analysis of a proposed project's potential energy use (including transportation-related energy), sources of energy supply, and ways to reduce energy demand, including through the use of efficient transportation alternatives. (See State CEQA Guidelines, Appendix F.)

4.3.2.3 Local Policies and Regulations

The San Luis Obispo County 2001 CAP is a comprehensive planning document intended to provide guidance to the SLOAPCD and other local agencies on how to attain and maintain the state standards for ozone and PM_{10}. The CAP presents a detailed description of the sources and pollutants which impact the jurisdiction, future air quality impacts to be expected under current growth trends, and an appropriate control strategy for reducing ozone precursor emissions, thereby improving air quality.

For example, numerous rules adopted by the County Board of Supervisors and implemented by SLOAPCD to address criteria pollutant emissions. For instance, several SLOAPCD rules address conventional emissions from combustion sources such as boilers, heaters, and engines that often result in equipment modifications or replacement that improves the energy efficiency of those units and reduces fossil fuel use. Similarly, rules that regulate or prohibit open burning activities reduce carbon dioxide (CO_2) emissions from that activity. SLOAPCD Rule 426 regulates landfill emissions of methane. Through the CEQA review process, SLOAPCD also evaluates impacts from land use development projects and recommends measures to reduce emissions. Mitigation measures focus on reducing emissions from motor vehicles and improving energy efficiency, both of which directly reduce criteria pollutants and GHGs. Such strategies include incorporation of energy efficiency measures (increased insulation, high efficiency appliances and lighting, passive and active solar systems, etc.) that go beyond current building standards, and including Smart Growth principles into the project design to reduce vehicle trips and increase the viability of alternative transportation.

The County has prepared an EnergyWise Plan (Climate Action Plan) – Designing Energy and Climate Solutions for the Future. This plan identifies strategies to reduce the county's GHG emissions by 15% below the baseline year of 2006 by the year 2020. This goal is consistent with AB 32. The plan includes the following:

- Scientific and regulatory framework for addressing climate change and GHGs at the local level.
- Identifies sources of GHG emissions from sources within the unincorporated county and estimates how these emissions may change over time.
- Forecasts emissions to reflect the County's desired growth projections without regulatory or technical intervention to reduce GHG emissions and provides an emissions reduction target consistent with AB 32 and the County's General Plan.
- Provides energy use, transportation, land use, water use, and solid waste strategies to reduce San Luis Obispo County's GHG emissions and quantifies the potential emissions reductions that will be achieved by implementing each strategy.
- Identifies existing and proposed strategies to reduce emissions from County operations and facilities.
- Addresses adaptation to climate change – climate adaptation is an adjustment in natural or human systems in response to actual or expected climatic change and its effects.
- Presents an implementation program to assist with monitoring and prioritization of the reduction strategies through 2020.

4.3.3 Thresholds of Significance

The significance of potential air quality and GHG-related impacts is based on thresholds identified within Appendix G of the CEQA Guidelines, the San Luis Obispo County Initial Study Checklist, and standards

established within the SLOAPCD CEQA Air Quality Handbook (SLOAPCD 2012). These thresholds are discussed more specifically below.

4.3.3.1 County of San Luis Obispo Thresholds

The significance of potential impacts is based on thresholds identified within Appendix G of the State CEQA Guidelines and the County Initial Study Checklist, which provide the following thresholds for determining impact significance with respect to air quality and climate change. Impacts would be considered significant if the proposed project would:

a. Violate any federal or state ambient air quality standard, or exceed air quality emission thresholds as established by the SLOAPCD.

b. Expose any sensitive receptor to substantial air pollutant concentrations.

c. Create or subject individuals to objectionable odors.

d. Be inconsistent with the SLOAPCD's Clean Air Plan.

e. Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.

f. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

4.3.3.2 SLOAPCD CEQA Air Quality Thresholds

The SLOAPCD has developed the 2012 CEQA Air Quality Handbook (SLOAPCD 2012) to assist lead agencies, planning consultants, and project proponents in assessing the potential air quality impacts from residential, commercial, and industrial development. SLOAPCD has also released a clarification memorandum to simplify the process of evaluating and mitigating potential air quality impacts from new development in San Luis Obispo County (SLOAPCD 2017b). The CEQA Handbook defines the criteria used by the SLOAPCD to determine when an air quality analysis is necessary, the type of analysis that should be performed, the significance of the impacts predicted by the analysis, and the mitigation measures needed to reduce the overall air quality impacts. According to the CEQA Handbook, project impacts may also be considered significant if one or more of the following special conditions apply:

- If the project has the ability to emit hazardous or toxic air pollutants in the close proximity of sensitive receptors, such that an increased cancer risk affects the population;
- If the project has the potential to emit diesel particulate matter (DPM) in an area of human exposure, even if overall emissions are low;
- If the project proposes remodeling or demolition operations where asbestos-containing materials will be encountered;
- If naturally-occurring asbestos has been identified in the project area;
- If the project has the ability to emit hazardous or toxic air pollutants in the close proximity of sensitive receptors, such as schools, churches, hospitals, etc.; or
- If the project results in a nuisance odor problem to sensitive receptors.

4.3.3.2.1 THRESHOLDS FOR SHORT-TERM CONSTRUCTION EMISSIONS

Heavy equipment and earth-moving operations can generate construction dust and combustion emissions. These may have substantial temporary impacts on local air quality. Table 4.3-2 summarizes the level of construction-related emissions requiring mitigation.

Table 4.3-2. Thresholds of Significance for Construction Emissions

Pollutant	Threshold		
	Daily (lbs)	Quarterly Tier 1 (tons)	Quarterly Tier 2 (tons)
Reactive organic gases (ROG) and Nitrates of Oxygen (NO_x) combined	137	2.5	6.3
Diesel particulate matter (DPM)	7	0.13	0.32
Fugitive particulate matter (PM_{10}), dust	n/a	2.5	n/a
Greenhouse Gases (CO_2, methane [CH_4], nitrous oxide [N_2O], hydrofluorocarbon [HFC], chlorofluorocarbon [CFC], sulfur hexafluoride [SF_6])	Amortized and Combined with Operational Emissions (see below)		

Source: SLOAPCD 2012.

Mitigation of construction activities is required when the emission thresholds are equaled or exceeded by fugitive and/or combustion emissions as follows:

Reactive Organic Gases (ROG) and Nitrates of Oxygen (NO_x) Emissions

- **Daily:** For construction projects exceeding the 137 pounds per day (lbs/day) threshold requires Standard Mitigation Measures;
- **Quarterly – Tier 1:** For construction projects exceedance of the 2.5 tons per quarter threshold requires Standard Mitigation Measures and Best Available Control Technology (BACT) for construction equipment. Off-site mitigation may be required if feasible mitigation measures are not implemented, or if no mitigation measures are feasible for the project.
- **Quarterly – Tier 2:** For construction projects exceeding the 6.3 tons per quarter threshold, Standard Mitigation Measures, BACT, implementation of a Construction Activity Management Plan (CAMP) and off-site mitigation are required.

Diesel Particulate Matter Emissions

- **Daily:** For construction projects expected to be completed in less than one quarter, exceedance of the 7 lbs/day threshold requires Standard Mitigation Measures;
- **Quarterly – Tier 1:** For construction projects lasting more than one quarter, exceedance of the 0.13 ton per quarter threshold requires Standard Mitigation Measures, and BACT for construction equipment; and,
- **Quarterly – Tier 2:** For construction projects lasting more than one quarter, exceedance of the 0.32 ton per quarter threshold requires Standard Mitigation Measures, BACT, implementation of a CAMP, and off-site mitigation.

Fugitive Particulate Matter (PM_{10}), Dust Emissions

- **Quarterly:** Exceedance of the 2.5 tons per quarter threshold requires Fugitive PM_{10} Mitigation Measures and may require the implementation of a CAMP.

Greenhouse Gas Emissions

- GHGs from construction projects must be quantified and amortized over the life of the project. The amortized construction emissions must be added to the annual average operational emissions and then compared to the operational thresholds in Section 3.5.1, Significance Thresholds for Project-Level Operational Emissions. To amortize the emissions over the life of the project, calculate the total GHG emissions for the construction activities, divide it by the project life (i.e., 50 years for residential projects and 25 years for commercial projects), then add that number to the annual operational phase GHG emissions.

Special Conditions for Construction Activity

In addition to the construction air quality thresholds defined above, there are a number of special conditions, local regulations, or federal and state rules that apply to construction activities. These conditions must be addressed in proposed construction activity and are summarized below.

The proximity of sensitive individuals (receptors) to a construction site constitutes a special condition and may require a more comprehensive evaluation of toxic diesel PM impacts and, if deemed necessary by the SLOAPCD, more aggressive implementation of mitigation measures than described below in the diesel idling section. Areas where sensitive receptors are most likely to spend time include schools, parks and playgrounds, day care centers, nursing homes, hospitals, and residential dwelling unit(s). The types of construction projects that typically require a more comprehensive evaluation include large-scale, long-term projects that occur within 1,000 feet of a sensitive receptor location(s).

In addition, portable equipment and engines 50 horsepower or greater used during construction activities will require California statewide portable equipment registration (issued by CARB) or an APCD permit.

4.3.3.2.2 THRESHOLDS FOR LONG-TERM OPERATIONAL EMISSIONS

The threshold criteria established by the SLOAPCD to determine the significance and appropriate mitigation level for long-term operational emissions (i.e., vehicular and area source emissions) from a project are presented in Table 4.3-3. Emissions that equal or exceed the designated threshold levels are considered potentially significant and should be mitigated. As shown in the table, the level of analysis and mitigation recommended follows a tiered approach based on the overall amount of emissions generated by the project. For projects requiring air quality mitigation, the SLOAPCD has developed a list of both standard and discretionary mitigation strategies tailored to the type of project being proposed: residential, commercial, or industrial.

Table 4.3-3. Thresholds of Significance for Operational Emissions

Pollutant	Threshold	
	Daily (lbs)	Annual (tons/year)
Ozone Precursors (ROG+NOx)[1]	25	25
Diesel Particulate Matter (DPM)[1]	1.25	n/a
Fugitive Particulate Matter (PM_{10}), Dust	25	25
CO	550	n/a
Greenhouse gases	Consistency with a Qualified Greenhouse Gas Reduction Plan or 1,150 metric tons of CO_2 equivalent ($MTCO_2e$)/year or 4.9 CO_2e/Service Population (SP)/year (residents + employees)	

[1] CalEEMod – use winter operational emission data to compare to operational thresholds.

Source: SLOAPCD 2012.

Ozone Precursor Emissions

If the project's ozone precursor emissions are below the APCD's 25 lbs/day (combined ROG+NOx emissions) the project would not exceed the significant threshold identified by SLOAPCD and no ozone mitigation measures are necessary.

Projects that emit 25 lbs/day or more of ozone precursors (ROG+NOx combined) have the potential to cause significant air quality impacts, and should be submitted to the SLOAPCD for review. Onsite mitigation measures, following the guidelines in Section 3.7 of the CEQA Air Quality Handbook (Operational Emission Mitigation) (SLOAPCD 2012), are recommended to reduce air quality impacts to a level of insignificance.

If all feasible mitigation measures are incorporated into the project and emissions can be reduced to less than 25 lbs/day, the proposed project would not exceed the significance threshold identified by SLOAPCD (following implementation of mitigation measures).

If all feasible mitigation measures are incorporated into the project and emissions are still greater than 25 lbs/day, then additional mitigation measures, including offsite mitigation, may be required depending on the level and scope of air quality impacts identified in the EIR.

Diesel Particulate Matter Emissions

DPM is seldom emitted from individual projects in quantities, which lead to local or regional air quality attainment violations. DPM is, however, a toxic air contaminant and carcinogen, and exposure to DPM may lead to increased cancer risk and respiratory problems. Certain industrial and commercial projects may emit substantial quantities of DPM through the use of stationary and mobile onsite diesel-powered equipment as well diesel trucks and other vehicles that serve the project.

Projects that emit more than 1.25 lbs/day of DPM need to implement onsite BACT measures. If sensitive receptors are within 1,000 feet of the project site, a Health Risk Assessment may also be required.

Fugitive Particulate Matter (Dust) Emissions

Projects that emit more than 25 lbs/day or 25 tons per year of fugitive particulate matter are required to implement permanent dust control measures to mitigate the emissions below these thresholds or provide

suitable offsite mitigation approved by the SLOAPCD. Operational fugitive dust emissions from a proposed project are calculated using the CalEEMod model discussed in Section 3.6.1 of the CEQA Handbook. Typical sources of operational emissions included the following:

- **Paved roadways:** Vehicular traffic on paved roads that are used to accesses large residential, commercial, or industrial projects can generate significant dust emissions.
- **Off- and/or on-site unpaved roads or surfaces:** Even at low traffic volume, vehicular traffic on unpaved roads or surfaces that are used to accesses residential, commercial, or industrial operations or that accesses special events, etc., can generate significant dust emissions.
- **Industrial and/or commercial operations:** Certain industrial operations can generate significant dust emissions associated with vehicular access, commercial, or industrial activities.

Any of the above-referenced land uses or activities can result in dust emissions that exceed the SLOAPCD significance thresholds, cause violations of an air quality standard, or create a nuisance impact in violation of SLOAPCD Rule 402 *Nuisance*. In all cases where such impacts are predicted, appropriate fugitive dust mitigation measures shall be implemented.

Carbon Monoxide Emissions

Carbon monoxide (CO) is a colorless, odorless, tasteless gas emitted during combustion of carbon-based fuels. While few land use projects result in high emissions of CO, this pollutant is of particular concern when emitted into partially or completely enclosed spaces such as parking structures and garages. Projects that emit more than 550 lbs/day of CO and occur in a confined or semi-confined space (e.g., parking garage or enclosed indoor stadium) must be modeled to determine their significance. In confined or semi-confined spaces where vehicle activity occurs, CO modeling is required. If modeling shows the potential to violate the state CO air quality standard, mitigation or project redesign is required to reduce CO concentrations to a level below the health-based standard.

4.3.3.2.3 GUIDELINES FOR APPLYING ROG, NO_X, AND PM_{10} MITIGATION MEASURES

In general, projects that do not exceed the 25 lbs/day ROG+NOx threshold do not require mitigation. For projects that exceed this threshold, the SLOAPCD has developed a list of mitigation strategies for residential, commercial, and industrial projects. The project proponent may suggest alternate mitigation measures if the SLOAPCD-suggested measures are not feasible. The recommended standard air quality mitigation measures have been separated according to land use (i.e., residential, commercial and industrial), measure type (i.e., site design, energy efficiency and transportation) and pollutant reduced (i.e., ozone, particulate matter, DPM, and GHGs). Any residential, commercial, or industrial project generating 25 lbs/day or more of $ROG+NO_x$ or PM_{10} should select the applicable number of mitigation measure as outlined in the CEQA Air Quality Handbook to reduce the air quality impacts from the project below the significance thresholds.

4.3.4 Impact Assessment and Methodology

The SLOAPCD has established four separate categories of evaluation for determining the significance of air quality emissions. Full disclosure of the potential air pollutant and/or toxic air emissions from a project is needed for these evaluations, as required by CEQA. The evaluation categories include:

- Comparison of calculated project emissions to SLOAPCD emission thresholds;
- Consistency with the most recent CAP;

- Comparison of predicted ambient pollutant concentrations resulting from the project to federal and state health standards, where applicable; and
- The evaluation of special conditions that apply to certain projects.

Emission estimates for the proposed project have been quantified using CalEEMod software, and significance determinations are based on the SLOAPCD 2012 CEQA Air Quality Handbook and SLOAPCD CAP.

Short-term construction emissions were quantified using CalEEMod, version 2016.3.2, based on estimated construction schedules, vehicle use, and off-road equipment anticipated to be required during construction. Emissions were calculated for both daily and annual conditions. Refer to Appendix B for emissions modeling assumptions and results.

4.3.4.1 Emissions Modeling Methodology

Evaporative emissions associated with primary wastewater treatment processes were quantified using flow-based emission factors derived from the Tri-County Technical Advisory Committee (Tri-TAC) Guidance Document on Control Technology for VOC [Volatile Organic Compound] Air Emissions from POTWs [Publicly Owned Treatment Works] (AMBIENT Air Quality and Noise Consulting 2018). These emission factors were developed in a cooperative effort of POTWs and air regulatory agencies located in California. Emission factors contained in the Tri-TAC guidance document were derived from a combination of data generated by the Pooled Emissions Estimation Program (PEEP), the Joint Emissions Inventory Program (JEIP) submitted to the South Coast Air Quality Management District per Rule 1179, and toxics inventories from individual California POTWs. Refer to Appendix B for emissions modeling assumptions and results.

Long-term increases of toxic air contaminants were quantified based on emission factors derived from the Tri-TAC Guidance Document on Control Technology for VOC Air Emissions from POTWs for the primary WWTP processes proposed to be installed. Associated health risks and potential exposure to toxic air contaminants and were assessed based on a screening-level health risk assessment prepared for evaporative emissions of toxic air contaminants associated with the proposed improvements.

4.3.5 Project-Specific Impacts and Mitigation Measures

The proposed project would result in both short-term construction-related impacts and long-term operational impacts. Grading and construction activities would result in the creation of construction dust, as well as short-term construction vehicle emissions. Fugitive dust emissions would result from land clearing, ground excavation, cut and fill operations, and equipment traffic. Combustion emissions, such as NO_x and DPM, are most significant when using large diesel-fueled scrapers, loaders, dozers, haul trucks, compressors, generators, and other types of equipment. Operational impacts would include any emissions generated by operation and maintenance of the facilities, and potential odors from storage ponds, spray fields, and sludge drying beds. Construction-related and operational emissions are analyzed separately under each threshold below.

4.3.5.1 Violate Ambient Air Quality Standards, or Exceed SLOAPCD Air Quality Emission Thresholds

4.3.5.1.1 CONSTRUCTION-RELATED EMISSIONS

Assuming that all improvements were to be constructed on the same day, the proposed project would generate maximum daily emissions of approximately 74.2 lbs/day of ROG+NO_X and 3.6 lbs/day of exhaust PM_{10}. Daily emissions would not exceed SLOAPCD's significance thresholds of 137 lbs/day ROG+NO_X or 7 lbs/day of exhaust PM_{10} (Table 4.3-4). The proposed project would generate maximum annual construction emissions of approximately 1.7 tons/year of ROG+NO_X, 0.3 tons/year of fugitive PM_{10}, and 0.8 tons/year of exhaust PM_{10}. Quarterly emissions would be less and would not exceed SLOAPCD's significance thresholds of 2.5 tons/ quarter of ROG+NO_X, 2.5 tons/quarter of fugitive PM_{10}, or 0.13 tons/quarter of exhaust PM_{10} (Table 4.3-5).

4.3.5.1.2 OPERATION-RELATED EMISSIONS

The proposed project would generate maximum daily emissions of approximately 1.9 lbs/day of ROG+NO_X, 1.8 lbs/day of CO, and 0.1 lbs/day of exhaust PM_{10}. Daily emissions of fugitive PM_{10} would be negligible. Daily emissions would not exceed SLOAPCD's significance thresholds of 25 lbs/day ROG+NO_X, 550 lbs/day of CO, 25 lbs/day of fugitive PM_{10}, or 1.25 lbs/day of exhaust PM_{10} (Table 4.3-6). The proposed project would generate maximum annual emissions of less than 0.1 tons/year of ROG+NO_X. Annual emissions of fugitive PM_{10} would be negligible. Annual emissions would not exceed SLOAPCD's significance thresholds of 25 tons/year of ROG+NO_X or 25 tons/year of fugitive PM_{10} (Table 4.3-7).

Regarding GHG emissions, the proposed project would generate approximately 103 metric tons of carbon dioxide equivalent ($MTCO_2e$) per year. Operational emissions would not exceed SLOAPCD's recommended significance threshold of 10,000~~1,150~~ $MTCO_2e$/year (Table 4.3-8).

Therefore, the potential for the proposed project to violate or exceed established air quality thresholds is considered less than significant (Class III). No mitigation measures are necessary.

Table 4.3-4. Daily Construction Emissions

Construction Activities	Emissions (lbs/day)										
	ROG	NO_X	ROG+NO_X	CO	SO_2	PM_{10}			$PM_{2.5}$		
						FUG	EXH	TOT	FUG	EXH	TOT
Sludge Drying Beds											
On-Site	2.1	24.1	26.2	10.7	0.0	6.0	1.1	**7.1**	3.3	1.0	**4.3**
Off-Site	0.1	0.6	0.7	0.6	0.0	0.1	0.0	**0.1**	0.0	0.0	**0.0**
Total	*2.2*	*24.7*	*26.9*	*11.3*	*0.0*	*6.1*	*1.1*	***7.2***	*3.3*	*1.0*	***4.3***
Storage Pond And Spray Fields											
On-Site	2.1	24.1	26.2	10.7	0.0	6.6	1.1	**7.6**	3.4	1.0	**4.4**
Off-Site	0.1	0.1	0.2	0.5	0.0	0.1	0.0	**0.1**	0.0	0.0	**0.0**
Total	*2.2*	*24.2*	*26.4*	*11.2*	*0.0*	*6.7*	*1.1*	***7.7***	*3.4*	*1.0*	***4.4***
WWTP Upgrades											
On-Site	0.2	2.1	2.3	1.8	0.0	0.0	0.2	**0.2**	0.0	0.1	**0.1**
Off-Site	0.1	0.6	0.7	0.6	0.0	0.1	0.0	**0.1**	0.0	0.0	**0.0**
Total	*0.3*	*2.7*	*3.0*	*2.4*	*0.0*	*0.1*	*0.2*	***0.3***	*0.0*	*0.1*	***0.1***
Lift Station And Pipeline											
On-Site	0.8	7.6	8.4	5.7	0.0	0.0	0.6	**0.6**	0.0	0.5	**0.5**
Off-Site	0.1	0.8	0.9	0.6	0.0	0.1	0.0	**0.1**	0.0	0.0	**0.0**
Total	*0.9*	*8.4*	*9.3*	*6.3*	*0.0*	*0.1*	*0.6*	***0.7***	*0.0*	*0.5*	***0.5***
Sewage Collection System Improvements											
On-Site	0.8	7.6	8.4	5.7	0.0	0.0	0.6	**0.6**	0.0	0.5	**0.5**
Off-Site	0.1	0.1	0.2	0.5	0.0	0.1	0.0	**0.1**	0.0	0.0	**0.0**
Total	*0.9*	*7.7*	*8.6*	*6.2*	*0.0*	*0.1*	*0.6*	***0.7***	*0.0*	*0.5*	***0.5***
Max. Daily Emissions*	**6.5**	**67.0**	**74.2**	**37.4**	**0.1**	**13.1**	**3.6**	**16.6**	**6.9**	**3.1**	**10.0**
Significance Thresholds	**--**	**--**	**137**	**--**	**--**	**--**	**7**	**--**	**--**	**--**	**--**
Exceeds Thresholds?	**--**	**--**	**NO**	**--**	**--**	**--**	**NO**	**--**	**--**	**--**	**--**

Note: FUG = Fugitive, EXH = Exhaust, TOT = Total

*Conservatively assumes all construction activities occurring simultaneously.

Table 4.3-5. Annual Construction Emissions

Construction Period	Emissions (Tons/Year)										
	ROG	NO_X	$ROG+NO_X$	CO	SO_2	PM_{10}			$PM_{2.5}$		
						FUG	EXH	TOT	FUG	EXH	TOT
Total Annual Emissions	0.2	1.5	1.7	0.9	0.0	0.3	0.08	**0.4**	0.1	0.1	**0.2**
Avg. Quarterly Emissions	0.1	0.4	0.4	0.2	0.0	0.1	0.02	**0.1**	0.0	0.0	**0.1**
Quarterly Significance Thresholds	**--**	**--**	**2.5**	**--**	**--**	**2.5**	**0.13**	**--**	**--**	**--**	**--**
Exceeds Thresholds?	**--**	**--**	**NO**	**--**	**--**	**NO**	**NO**	**--**	**--**	**--**	**--**

Note: FUG = Fugitive, EXH = Exhaust, TOT = Total

Table 4.3-6. Daily Operational Emissions

Source	Emissions (Lbs/Day)										
	ROG	NO_X	$ROG+NO_X$	CO	SO_2	PM_{10}			$PM_{2.5}$		
						FUG	EXH	TOT	FUG	EXH	TOT
Evaporative Processes	1.3	0.0	0.0	0.0	0.0	0.0	0.0	**0.0**	0.0	0.0	**0.0**
Energy Use	0.0	0.0	0.0	0.0	0.0	0.0	0.0	**0.0**	0.0	0.0	**0.0**
Off-Road Equipment	0.3	1.5	1.8	1.7	0.0	0.0	0.1	**0.1**	0.0	0.1	**0.1**
Worker Commute	0.0	0.0	0.0	0.1	0.0	0.0	0.0	**0.0**	0.0	0.0	**0.0**
Haul Trucks	0.0	0.1	0.1	0.0	0.0	0.0	0.0	**0.0**	0.0	0.0	**0.0**
Total	**0.3**	**1.6**	**1.9**	**1.8**	**0.0**	**0.0**	**0.1**	**0.1**	**0.0**	**0.1**	**0.1**
Significance Thresholds	**--**	**--**	**25**	**550**	**--**	**25**	**1.25**	**--**	**--**	**--**	**--**
Exceeds Thresholds?	**--**	**--**	**NO**	**NO**	**--**	**NO**	**NO**	**--**	**--**	**--**	**--**

Note: FUG = Fugitive, EXH = Exhaust, TOT = Total

Table 4.3-7. Annual Operational Emissions

Source	Emissions (Tons/Year)										
	ROG	NO_X	ROG+NO_X	CO	SO_2	PM_{10}			$PM_{2.5}$		
						FUG	EXH	TOT	FUG	EXH	TOT
Evaporative Processes	0.23	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**	0.00	0.00	**0.00**
Energy Use	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**	0.00	0.00	**0.00**
Off-Road Equipment	0.00	0.02	0.02	0.02	0.00	0.00	0.00	**0.00**	0.00	0.00	**0.00**
Worker Commute	0.00	0.00	0.00	0.02	0.00	0.00	0.00	**0.00**	0.00	0.00	**0.00**
Haul Trucks	0.00	0.01	0.01	0.00	0.00	0.00	0.00	**0.00**	0.00	0.00	**0.00**
Total	**0.01**	**0.03**	**0.04**	**0.04**	**0.00**	**0.00**	**0.00**	**0.01**	**0.00**	**0.00**	**0.00**
Significance Thresholds	**--**	**--**	**25**	**--**	**--**	**25**	**--**	**--**	**--**	**--**	**--**
Exceeds Thresholds?	**--**	**--**	**NO**	**--**	**--**	**NO**	**--**	**--**	**--**	**--**	**--**

Note: FUG = Fugitive, EXH = Exhaust, TOT = Total

Table 4.3-8. Operational GHG Emissions

Source	$MTCO_2e$/Year
Evaporative Process Emissions	0.00
Energy Use	90.10
Off-road Equipment	1.90
Worker Commute	3.10
Haul Trucks	3.00
Amortized Const. Emissions	4.80
Total	**102.90**
Significance Threshold	**10,000~~1,150~~**
Exceeds Significance Threshold?	**NO**

4.3.5.2 Expose any Sensitive Receptor to Substantial Air Pollutant Concentrations

No portion of the proposed Gregg Ranch disposal site or existing spray field and storage pond location (where the proposed lift station would be located) is located within 1,000 feet of any sensitive receptors. The existing WWTF is surrounded by single-family residences at distances of approximately 500–700 feet away (including approximately 200 feet of vertical elevation differences between the two uses). The 2.0-mile-long force main pipeline extends within less than 200 feet of a large lot rural residential development along Lynch Canyon Road approximately 0.3 mile (1,800 feet) west of the Gregg Ranch disposal site.

Air emissions modeling concluded that the project would not generate substantial air pollutant concentrations during construction or operation that would substantially affect sensitive receptors. Based on the nature of improvements proposed at the existing WWTF (installation of sludge drying beds [if any]) and along Lynch Canyon Road (pipeline installation), potential impacts related to construction and operation of the project would be temporary and minimal. However, these activities would occur in close proximity to multiple sensitive receptors (less than 200 feet in some cases). Therefore, short-term impacts are considered potentially significant. Although sensitive receptors near Gregg Ranch are located more than 1,000 feet from the project area, grading and earthmoving activities associated with construction of these project components are more substantial; therefore, potential short-term impacts are considered potentially significant.

Implementation of standard dust ~~and erosion~~ control and diesel idling reduction measures would reduce potential impacts to sensitive receptors to less than significant. Therefore, the potential for the proposed project to result in the exposure of substantial air pollutant concentrations to sensitive receptors is considered less than significant with mitigation (Class II).

AQ Impact 1	
Proposed development could expose sensitive receptors to substantial air pollutant concentrations (*Class II, less than significant with mitigation*).	
Mitigation Measures	
AQ/mm-1.1	*All surfaces and materials shall be managed to ensure that fugitive dust emissions are adequately controlled to below the 20% opacity limit, identified in the SLOAPCD's Rule 401, Visible Emissions, and to ensure that dust is not emitted offsite. This applies to surfaces that will be graded, that are currently being graded, or that have been graded, and to all materials, whether filled, excavated, transported, or stockpiled. The following fugitive dust control measures shall be implemented:* *a. Reduce the amount of the disturbed area where possible;* *b. Use water trucks or sprinkler systems in sufficient quantities to prevent airborne dust from leaving the site. Increased watering frequency shall be required whenever wind speeds exceed 15 miles per hour. Reclaimed (non-potable) water shall be used whenever possible;* *c. Since water use is a concern due to drought conditions, the contractor shall have the option to implement the use of a SLOAPCD-approved dust suppressant(s) as a potential alternative to reduce the amount of water used for fugitive dust control. For a list of dust suppressants, see Section 4.3 of the CEQA Air Quality Handbook, available at: http://slocleanair.org/business/landusecega.php.*

AQ Impact 1	
	d. All dirt stockpile areas shall be sprayed daily as needed; and *e. All roadways, driveways, sidewalks, etc. to be paved shall be completed as soon as possible, and building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.*
AQ/mm-1.2	*The applicant shall implement the following mitigation measures to minimize nuisance impacts and to significantly reduce fugitive dust emissions:* *a. Permanent dust control measures identified in the approved project plans shall be implemented as soon as possible following completion of any soil disturbing activities;* *b. Exposed ground areas that are planned to be reworked at dates greater than one month after initial grading shall be sown with a fast germinating native grass seed and watered until vegetation is established;* *c. All disturbed soil areas not subject to revegetation shall be stabilized using approved chemical soil binders, jute netting, or other methods approved in advance by the SLOAPCD;* *d. Vehicle speed for all construction vehicles shall not exceed 15 miles per hour on any unpaved surface at the construction site;* *e. All trucks hauling dirt, sand, soil, or other loose materials are to be covered or shall maintain at least two feet of freeboard (minimum vertical distance between top of load and top of trailer) in accordance with California Vehicle Code Section 23114;* *f. Install wheel washers where vehicles enter and exit unpaved roads onto streets, or wash off trucks and equipment leaving the site; and* *g. Sweep streets at the end of each day if visible soil material is carried onto adjacent paved roads. Water sweepers with reclaimed water shall be used where feasible.*
AQ/mm-1.3	*For areas within 1,000 feet of residences, the following additional measures shall apply to the greatest extent feasible:* *1. California Diesel Idling Regulations* *a. On-road diesel vehicles shall comply with Section 2485 of Title 13 of the California Code of Regulations. This regulation limits idling from diesel-fueled commercial motor vehicles with gross vehicular weight ratings of more than 10,000 pounds and licensed for operation on highways. It applies to California and non-California based vehicles. In general, the regulation specifies that drivers of said vehicles:* *i. Shall not idle the vehicles primary diesel engine for greater than 5 minutes at any location, except as noted in Subsection (d) of the regulation; and* *ii. Shall not operate a diesel-fueled auxiliary power system (APS) to power a heater, air conditioner, or any ancillary equipment on that vehicle during sleeping or resting in a sleeper berth for greater than 5 minutes at any location when within 1,000 feet of a restricted area, except as noted in Subsection (d) of the regulation.* *b. Off-road diesel equipment shall comply with the 5-minute idling restriction identified in Section 2449(d)(2) of the CARB's In-Use Off-Road Diesel regulation.* *c. Signs must be posted in the designated queuing areas and job sites to remind drivers and operators of the state's 5-minute idling limit.* *d. The specific requirements and exceptions in the regulations can be reviewed at the following websites: www.arb.ca.gov/msprog/truck-idling/factsheet.pdf and www.arb.ca.gov/regact/2007/ordiesl07/frooal.pdf.*

AQ Impact 1	
	2. Diesel Idling Restrictions Near Sensitive Receptors. In addition to the state required diesel idling requirements, the project applicant shall comply with these more restrictive requirements to minimize impacts to nearby sensitive receptors: *a. Staging and queuing areas shall not be located within 1,000 feet of sensitive receptors to the greatest extent feasible;* *b. Diesel idling within 1,000 feet of sensitive receptors shall not be permitted to the greatest extent feasible;* *c. Use of alternative fueled equipment is recommended; and* *d. Signs that specify the no idling areas must be posted and enforced at the site.* *3. Truck Routing. Proposed truck routes should be evaluated and selected to ensure routing patterns have the least impact to residential dwellings and other sensitive receptors, such as schools, parks, day care centers, nursing homes, and hospitals.*
AQ/mm-1.4	*Prior to construction, the applicant shall obtain California statewide portable equipment registrations or a SLOAPCD permit for any portable construction equipment or engine with 50 horsepower or greater to be used for project construction.*
AQ/mm-1.5	*Demolition/Asbestos. Demolition activities can have potential negative air quality impacts, including issues surrounding proper handling, abatement, and disposal of asbestos containing material (ACM). Asbestos containing materials could be encountered during the demolition or remodeling of existing structures or the disturbance, demolition, or relocation of above or below ground utility pipes/pipelines (e.g., transite pipes or insulation on pipes). If this project will include any of these activities, then it may be subject to various regulatory jurisdictions, including the requirements stipulated in the National Emission Standard for Hazardous Air Pollutants (40 CFR 61, Subpart M – asbestos NESHAP). These requirements include but are not limited to: 1) written notification, within at least 10 business days of activities commencing, to the APCD, 2) asbestos survey conducted by a Certified Asbestos Consultant, and 3) applicable removal and disposal requirements of identified ACM. Please contact the APCD Engineering & Compliance Division at (805) 781-5912 or go to http://slocleanair.org/rules-regulations/asbestos.php for further information. To obtain a Notification of Demolition and Renovation form go to the "Other Forms" section of http://slocleanair.org/library/download-forms.php.*
Residual Impacts	
Upon implementation of the above measures, this impact would be considered less than significant.	

4.3.5.3 Creation of Objectionable Odors

The construction phase of the proposed project is not anticipated to generate any objectionable odors beyond those typically associated with construction activities, which would be short term and limited in nature. Therefore, potential construction-related impacts associated with objectionable odors would be less than significant. During project operation, the proposed lift station and force main pipeline would be subsurface and are not expected to result in the creation of objectionable odors. Therefore, potential odor-related impacts associated with these project components would be less than significant.

The disposal facilities at Gregg Ranch and the proposed sludge drying beds (at Gregg Ranch or the existing WWTF) would have the potential to create objectionable odors during project operation. Odor impacts with the potential to affect residential areas and other sensitive receptors warrant particular attention according to the SLOAPCD's CEQA Handbook. SLOAPCD's nuisance impact guidance states that the project screening distance for wastewater treatment plants to sensitive receptors is 1 mile (SLOAPCD 2012). These potential impacts are considered in detail below.

The proposed spray field, storage ponds, and sludge drying beds would be directly exposed to air and heat, resulting in a potential for increased odor generation onsite. A total of seven residential dwellings and one bed and breakfast are located within 1 mile of the Gregg Ranch disposal site, which could be exposed to an increase in odors associated with the project. The existing WWTF is predominantly surrounded by lakeside residential development within the community of Oak Shores. A total of approximately 650–700 single-family residences are located within 1 mile of the existing WWTF. The potential increase in odor exposure at these sensitive receptor locations is considered potentially significant.

The existing WWTF includes wastewater treatment facilities that currently contribute to the odor baseline and expectations of surrounding residences and the community, including two existing aerated treatment ponds and storage ponds located onsite. There are no existing sludge drying beds at the wastewater plant, as the current treatment process does not require continual removal of sludge from the treatment ponds. Agricultural uses, such as cattle grazing, contribute to the existing odor baseline at Gregg Ranch.

According to the SLOAPCD, there have been no recorded odor complaints regarding the Oak Shores WWTF within the last 5 years (Dean Carlson, SLOAPCD, pers. comm. 2017). The SLOAPCD also had no record of odor complaints at the time of preparation of the 2008 Oak Shores EIR.

The County proposes to implement odor control measures at the proposed wastewater treatment facilities. Per the 2008 Oak Shores WWTP EIR, these measures would include:

> *"screening equipment with enclosed conveyance components and washing/dewatering functions at the headworks. Disposal bags would be directly attached to the discharge chute on the headworks screen. The spiral brush would clear the screen area to prevent build-up of screenings and a spray wash system would be used to periodically rinse the screen area. Odors generated by the sludge lagoons would be minimized by the use of brush-type surface aerators to maintain an aerated cap above the anoxic surface. One five-horsepower brush aerator would be used for each pond."*

As a part of the WWTF upgrade, the County would upgrade existing facilities to support a Biolac treatment system, which would improve wastewater treatment capabilities at the existing WWTF and include improved nitrate reduction techniques. This new treatment process would result in the production of improved effluent quality and contribute to an overall reduction in the potential for odor generation from the project site, existing WWTF, and existing storage ponds and spray fields.

Based on the odor control measures and improved treatment systems that would be facilitated by the project, the disposal facilities at Gregg Ranch are not expected to generate substantial odors. The improved effluent quality, including nitrate reduction processes, would reduce the potential for odor generation. In addition, mitigation has been identified that would require the County to design the spray field to minimize the potential for offsite drift, e.g., by prohibiting the use of tall sprinklers and misters that would lead to an increased likelihood of odors drifting offsite. Mitigation has also been identified that would require the County to submit an Odor Control Plan for review and approval by SLOAPCD. Upon project approval, the SLOAPCD would respond to any odor complaints received on a case-by-case basis, taking enforcement action as necessary. Upon implementation of the proposed odor reduction strategies, technological improvements in the treatment process and WWTF capabilities, and the recommended mitigation measures, potential odor-related impacts associated with the disposal facilities at Gregg Ranch (spray field and storage ponds) would be considered less than significant with mitigation (Class II).

The project includes two optional locations for the proposed sludge drying beds: at the new Gregg Ranch disposal facilities or within the existing Oak Shores WWTF. Unlike the treated effluent that would be disposed of at the spray field and storage ponds at Gregg Ranch, the sludge drying beds would include

solids that must be regularly screened out of the treatment process. The sludge drying beds would not be in use year-round. Sludge withdrawal from the new treatment system will increase over time as flow to the WWTF increases. It is anticipated that in the first 5 years of operation, sludge would need to be withdrawn from the solids holding pond one to two times per year (one to two truck trips). As flow to the system increases, sludge withdrawal would increase up to a proposed maximum of six times (six truck trips) per year. One truck trip is estimated to include approximately 4,000 gallons of wet sludge. Sludge would be trucked to the drying beds and air-dried during the summer months. Drying is expected to take a couple weeks, weather permitting. Dried sludge would then be scraped from the drying beds and hauled to landfill with similar frequency as the wet sludge that would be trucked to the drying beds.

The sludge drying beds are expected to have the greatest potential for odor generation associated with the proposed project. Although there are a larger number of sensitive receptors within 1 mile of the existing WWTF site, the WWTF is an existing use that contributes to existing odors and community expectations. The change in elevation from the WWTF and surrounding residences (approximately 200 feet) would also allow the WWTF to be managed in a way that prevents offsite odors, e.g., through installation of air filtration systems and enclosures (if necessary). At this location, the proposed sludge drying beds would also be subject to routine monitoring by existing WWTF staff members, while there would be no staff onsite at Gregg Ranch to regularly monitor potential odor emissions. For these reasons, the existing WWTF alternative location for the sludge drying beds is considered to be environmentally preferred from an odor perspective. Mitigation has been identified that would require the proposed sludge drying beds be located at the existing WWTF and be designed to manage potential odor generation. Upon implementation of these measures and previously discussed odor reduction strategies to be employed by the County, this impact would be less than significant with mitigation (Class II).

AQ Impact 2	
The proposed project could generate and expose people to objectionable odors (*Class II, less than significant with mitigation*).	
Mitigation Measures	
AQ/mm-2.1	*Prior to issuance of construction permits, the County shall submit an Odor Control Plan to the SLOAPCD for review and approval. This plan shall identify and describe potential odor sources~~.~~ describe sludge handling procedures, and include odor control strategies, including implementation of the nitrate reduction treatment process and staff maintenance check and monitoring schedules. The plan shall identify the contact information for an appropriate person at the County and SLOAPCD who shall be responsible for receiving and managing odor complaints. The plan shall identify options for reducing odor in the event of a complaint.*
AQ/mm-2.2	*Prior to approval of the improvements plans, the applicant shall show the proposed sludge drying beds at the existing Oak Shores WWTF on Ridge Rider Road and not at the Gregg Ranch Disposal Site. The sludge drying beds shall be lined and shall include a drainage system that allows for the collection of leachate for further treatment, if necessary.* *The selected sludge drying bed location shall be shown on all applicable project plans prior to construction.*
AQ/mm-2.3	*Prior to approval of the improvement plans, the applicant shall design the effluent discharge system to minimize the potential for offsite drift. The use of sprinklers or misters that exceed the height of the surrounding berm and that would allow for effluent to drift offsite shall be prohibited.*

AQ Impact 2
Residual Impacts
Upon implementation of the above measures, this impact would be considered less than significant.

4.3.5.4 Consistency with the District's Clean Air Plan

The proposed project is consistent with the general level of development anticipated and projected in the CAP. Based on the CAP, the Nacimiento Planning Area is projected to experience one of the highest percent increases in population in the County. The proposed project is supported by the CAP Land Use Management Strategy to plan compact communities, as it will extend infrastructure needs for a growing community. Therefore, potential impacts would be less than significant (Class III).

4.3.5.5 Generate Greenhouse Gas Emissions that Significantly Impact the Environment

In California, the main sources of GHGs are from the transportation and energy sectors. GHGs remain in the atmosphere for periods ranging from decades to centuries; the main GHGs emitted by human activities include CO_2, methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorochemicals (PFCs), and sulfur hexafluoride (SF_6).

A warming trend of approximately 1.0 to 1.7 degrees Fahrenheit occurred during the twentieth century. It is generally agreed that human activity has been increasing the concentration of GHGs in the atmosphere, mostly CO_2 from the combustion of coal, oil and gas. The effect of each GHG on climate change is measured as a combination of the volume or mass of its emissions, and the potential of a gas or aerosol to trap heat in the atmosphere (global warming potential), and is expressed as a function of how much warming would be caused by the same mass of CO_2. The potential effects on future climate change on California resources include increases of air temperature, sea level rise, reduced water resources and changed flood hydrology, changed forest composition and productivity, increased wild fires, changed habitats and ecosystems, changed crop yields and increased irrigation demands, and increased smog and public health issues.

The proposed project would generate approximately 103 $MTCO_2e$/year. 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. The proposed project's operational emissions would not exceed SLOAPCD's recommended significance threshold of 1,150 $MTCO_2e$/year. Therefore, the proposed project's potential to generate GHGs that significantly impact the environment is considered less than significant (Class III).

4.3.5.6 Conflict with a Greenhouse Gas-Reducing Plan or Policy

According to the County EnergyWise Plan, County water and wastewater facility emissions are anticipated to significantly increase in the coming years as a result of expansion or additional development of these facilities. The proposed project would not conflict with the County EnergyWise Plan GHG reduction targets or strategies. The proposed project's impact regarding potential conflict with existing greenhouse gas-reducing plans or policies is considered less than significant (Class III).

4.3.6 Cumulative Impacts

Implementation of the proposed WWTF upgrade and improvement project would not significantly contribute to air quality emissions or impacts generated by existing or future development. There are few to no existing related projects that are expected to contribute to potential cumulative impacts of the project. The proposed cumulative development scenario includes widely scattered rural residential development in the project vicinity. Based on the limited nature of these developments, and the low project-level contribution to potential air quality and GHG-related impacts, the project would result in a considerable contribution to potential cumulative air quality and GHG impacts. Potential cumulative impacts would be less than significant (Class III).

4.4 BIOLOGICAL RESOURCES

This section of the EIR identifies and evaluates potential impacts to biological resources resulting from implementation of the project. The existing setting discussion is based on the 2008 EIR prepared for the CSA 7A WWTP Upgrade Project and is supplemented with information from the U.S. Fish and Wildlife (USFWS) Information for Planning and Conservation (IPaC) database, California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDB), and California Native Plant Society (CNPS) database (Appendix C). Project-specific information is based on biological and botanical surveys and mapping conducted on March 31 and May 28, 2016, and January 27, 2018. Some of the information in this section has been developed with reference to the 2008 Oak Shores WWTP EIR; however, the focus of this SEIR is limited to the new or modified project components that were not previously analyzed in the 2008 Oak Shores WWTP EIR. The optional sludge drying bed location at the existing WWTF is within a dirt lot within the fenced facility. There are no sensitive biological resources at this location; therefore, this section focuses on the proposed lift station and force main pipeline and the proposed disposal facilities at Gregg Ranch.

4.4.1 Existing Conditions

The project site is located within and adjacent to the Oak Shores Village Area on the north shore of the Nacimiento Reservoir. Surrounding land uses include the Nacimiento Reservoir to the south and undeveloped open space, grazing lands, and rural lands to the north, east, and west. The existing WWTF is located on a 25.42-acre parcel within Oak Shores Village and is accessed from Oak Shores Drive and Lynch Canyon Road. The existing wet season storage ponds and spray fields are located on the west side of Oak Shores Drive, approximately 1.5 miles northwest of the WWTF. The existing WWTF disposal system also includes percolation basins located approximately 2,000 feet southwest of the storage ponds and spray fields, approximately 250 feet east of Kavanaugh Creek (the Kavanaugh percolation basins). The spray fields, wet season storage ponds, and Kavanaugh percolation basins are located on three adjacent parcels consisting of 7.9, 86.7, and 73 acres in size. The project site consists of approximately 56.88 acres.

4.4.1.1 Soils, Topography and Elevation

According to the Soil Survey for San Luis Obispo County and the U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) Web Soil Survey, soils in the project area consist of: Bad land soils; Dibble clay loam, 9 to 15 percent slopes; Dibble clay loam, 15 to 30 percent slopes; Dibble clay loam, 30 to 50 percent slopes; Shimmon loam, 15 to 30 percent slopes; Shimmon loam, 30 to 50 percent slopes; Arbuckle-San Ysidro complex, 2 to 9 percent slopes; Rincon clay loam, 2 to 9 percent slopes, Major Land Resource Area (MLRA) 14; and Rincon clay loam, 9 to 15 percent slopes, MLRA 14 (NRCS 2018). The topography of the project area is rolling to steep slopes, ranging in elevation from approximately 1,030 to 1,400 feet (314 to 427 meters) above mean sea level.

4.4.1.2 Natural Communities

The project site includes the Gregg Ranch site, the 2.0-mile-long force main pipeline alignment and associated lift station, and a 50-foot buffer around all project components. The total project site encompasses approximately 56.88 acres. The dominant natural communities within the project site were characterized using A Manual of California Vegetation (MCV; Sawyer et al. 2009). The natural community classification was cross referenced with the CNDDB to determine which natural communities are recognized as sensitive by the CDFW. The vegetation communities observed within the project site

include: blue oak woodland, California sagebrush scrub, bigberry manzanita chaparral, purple needlegrass grassland, nonnative grassland, ruderal (disturbed) habitat, and developed areas. One sensitive natural community, purple needlegrass grassland (California Natural Community Code Section 41.150.04), is present within the project site. Natural communities present within the project site are mapped on Figures 4.4-1 and 4.4-2 and are discussed in detail below.

4.4.1.2.1 BLUE OAK WOODLAND

Blue oak woodland, also referred to as the *Quercus douglasii* Woodland Alliance under the MCV classification, is endemic to California and is typically found in valley bottoms, foothills, and rocky outcrops in shallow soils low in fertility, moderately to excessively drained with extensive rock fragments, at elevations ranging from 30 to 1,900 meters. Blue oak (*Quercus douglasii*) is dominant or co-dominant in the tree canopy with associated species such as California buckeye (*Aesculus californica*), California juniper (*Juniperus californica*), California foothill pine (*Pinus sabiniana*), Coast live oak (*Quercus agrifolia*), valley oak (*Quercus lobata*), and interior live oak (*Quercus wislizeni*). The canopy within this community may range from intermittent to continuous (or savanna-like) and may be one or two tiered. The shrub layer is typically sparse to intermittent and the herbaceous layer is typically sparse or grassy with seasonal forbs.

Blue oak woodland is present at varying densities throughout the project area, ranging from dense blue oak woodland to open blue oak savanna co-mingled with California sagebrush scrub and nonnative grassland in the understory. Blue oak is the dominant species in this community within the project site. Approximately 18.84 acres of blue oak woodland habitat is present within the project site.

4.4.1.2.2 CALIFORNIA SAGEBRUSH SCRUB

California sagebrush scrub, also referred to as the *Artemisia californica* Shrubland Alliance under the MCV classification, is typically found on slopes that are usually steep and rarely flooded and along low-gradient deposits along streams on soils that are alluvial or colluvial derived and shallow, at elevations ranging from 0 to 1,200 meters. California sagebrush (*Artemisia californica*) is dominant or co-dominant in the shrub canopy with associated species such as chamise (*Adenostoma fasciculatum*), coyote brush (*Baccharis pilularis*), sticky monkey-flower (*Mimulus aurantiacus*), brittlebush (*Encelia* spp.), California buckwheat (*Eriogonum fasciculatum*), common deerweed (*Acmispon glaber* var. *glaber*), sage (*Salvia spp.*), black elderberry (*Sambucus nigra*), and poison oak (*Toxicodendron diversilobum*). Emergent trees or tall shrubs may be present at low cover.

California sagebrush scrub is scattered amongst the blue oak woodland community and is dominated by California sagebrush and coyote brush with nonnative grassland in the understory. Approximately 3.93 acres of California sagebrush scrub habitat is present within the project site.

4.4.1.2.3 BIGBERRY MANZANITA CHAPARRAL

Bigberry manzanita chaparral, also referred to as the *Arctostaphylos glauca* Shrubland Alliance under the MCV classification, is typically found on outcrops, ridges, middle or upper slopes, and alluvial fans on shallow to deep, coarse-textured, possibly mafic- or ultramafic-derived soils at elevations ranging from 450 to 1,700 meters. Bigberry manzanita (*Artostaphylos glauca*) is dominant or co-dominant in the shrub canopy with associated species such as chamise (*Adenostoma fasciculatum*), other manzanita species (*Arctostaphylos* spp.), California sagebrush (*Artemisia californica*), ceanothus (*Ceanothus* spp.), toyon (*Heteromeles arbutifolia*), oak species (*Quercus* spp.), and black sage (*Salvia mellifera*).

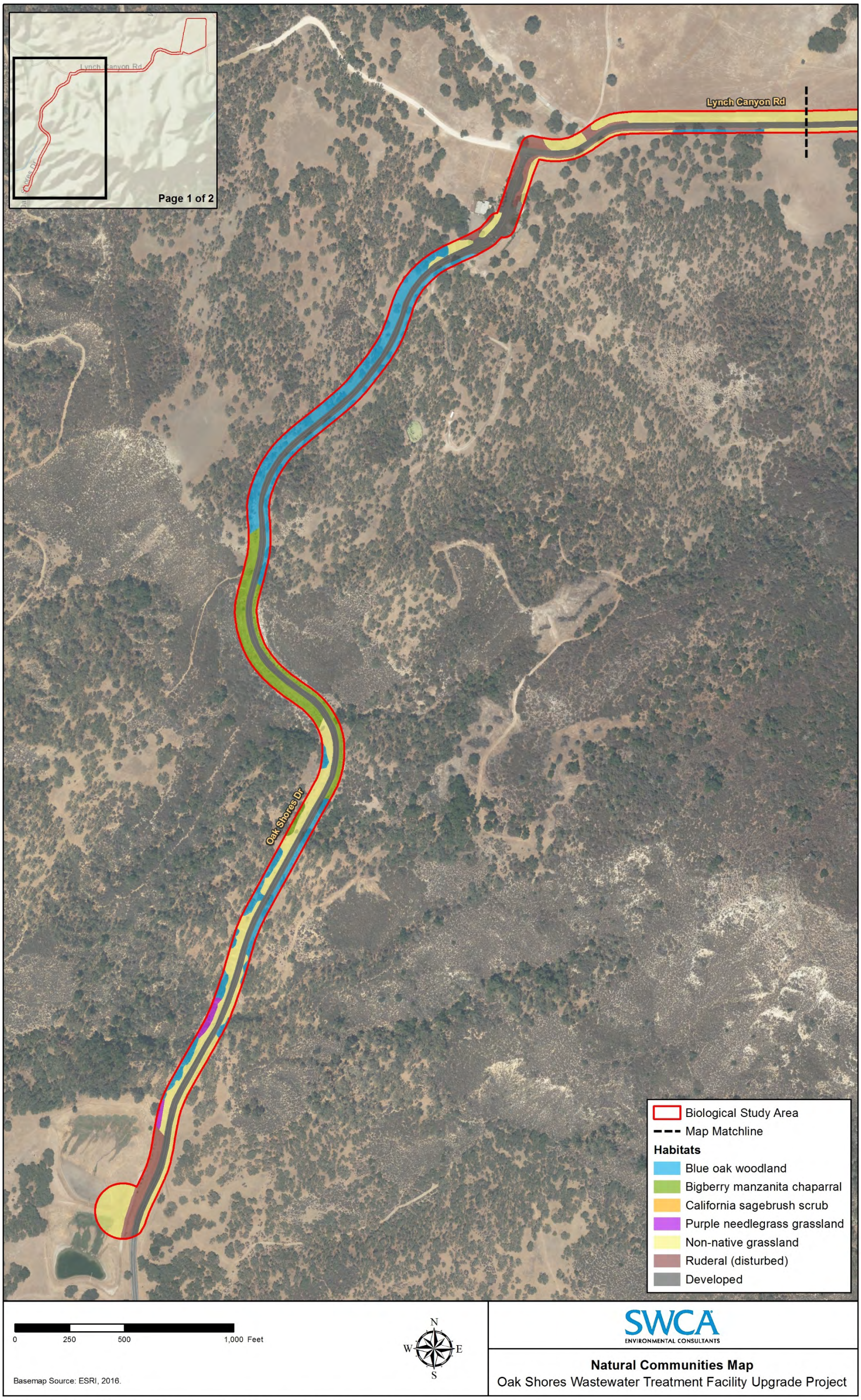


Figure 4.4-1. Natural communities map (sheet 1 of 2).

This page intentionally left lank.

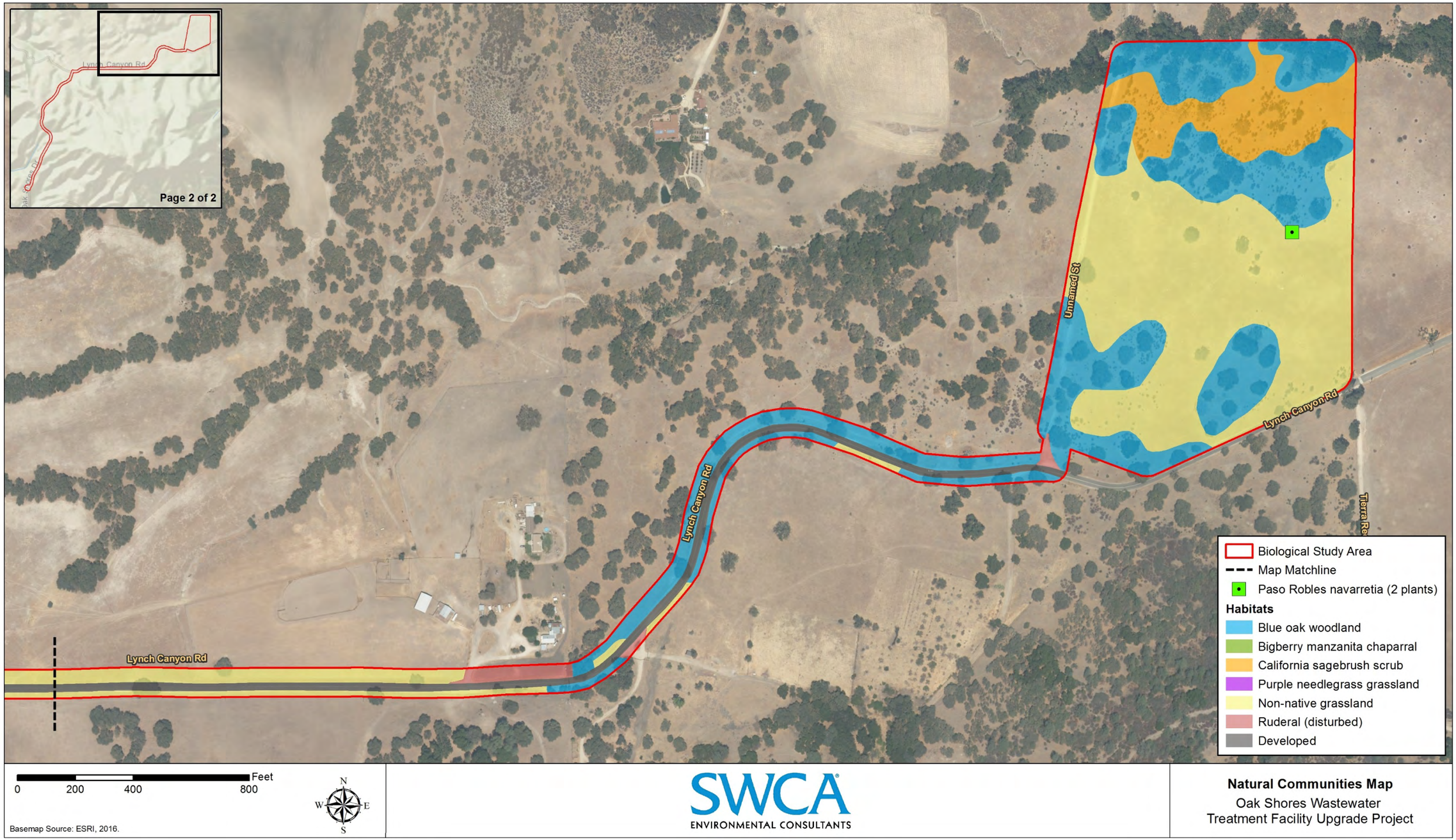


Figure 4.4-2. Natural communities map (sheet 2 of 2).

This page intentionally left blank.

4.4.1.2.4 PURPLE NEEDLEGRASS GRASSLAND

Purple needlegrass grassland, also referred to as the *Stipa pulchra* Herbaceous alliance under the MCV classification, is typically found in valley and foothill areas on all topographic locations on deep inland soils with high clay content or shallow and rocky soils near the coast at elevations ranging from 0 to 1,300 meters. Purple needlegrass (*Stipa pulchra*) is dominant or characteristically present in the herbaceous layer with other perennial grasses and herbs including milk vetch (*Astragalus* spp.), slender wild oak (*Avena barbata*), common wild oat (*Avena fatua*), soft brome (*Bromus hordeaceus*), red brome (*Bromus madritensis* ssp. *rubens*), Godetia (*Clarkia* spp.), doveweed (*Eremocarpus setiger*), popcorn flower (*Cryptantha* spp.), filaree (*Erodium* spp.), other needlegrass species (*Stipa cernua, Stipa lepida*), sanicle (*Sanicula* spp.), blue-eyed grass (*Sisyrinchium bellum*), and clover (*Trifolium* spp). Trees and shrubs may also be present at low cover, including oak trees (*Quercus* spp.) and shrubs such as California sagebrush (*Artemisia californica*), California buckwheat (*Eriogonum fasciculatum*), and sawtooth goldenbush (*Hazardia squarrosa*). Purple needlegrass grassland is considered a CNDDB Natural Community of Concern (California Natural Community Code *41.150.04).

Within the project site, there are a few small patches of purple needlegrass grassland, including one patch consisting of approximately 300 plants, located in the southwestern portion of the project site, on the northwest side of Oak Shores Drive. Communities of purple needlegrass within the project site are dominated by purple needlegrass as well as grass species consistent with the nonnative grassland habitat. Approximately 0.20 acre of purple needlegrass grassland is present within the project site.

4.4.1.2.5 NONNATIVE GRASSLAND

Nonnative grassland is present throughout the project site with varying dominance of nonnative species. Generally, the nonnative grassland habitat within the project site is consistent with wild oats grasslands, also referred to as the *Avena* (*barbata, fatua*) Herbaceous Semi-Natural Alliance under the MCV classification, and red brome or Mediterranean grass grasslands, also referred to as the *Bromus madritensis* ssp. *rubens – Schismus* (*arabicus, barbatus*) Herbaceous Semi-Natural Alliance under the MCV classification. Wild oats grassland is typically found in waste places, rangelands, and openings in woodlands at elevations that range from 10 to 1,200 meters. Wild oat (*Avena barbata* and/or *A. fatua*) is dominant or co-dominant in the herbaceous layer. Emergent trees and shrubs may also be present at low cover. Red brome or Mediterranean grass grasslands are found in all topographic settings and soil textures at elevations ranging from 0 to 2,200 meters. Red brome is dominant or co-dominant with other nonnatives in the herbaceous layer. Emergent shrubs may also be present at low cover.

Nonnative grassland is present throughout the project site along road shoulders, in disturbed areas, and forms the herbaceous layer in the understory of the blue oak woodland, California sagebrush scrub, and bigberry manzanita chaparral habitats. Dominant species within the nonnative grassland habitat include: slender wild oat (*Avena barbata*), red brome, annual fescue (F*estuca myuros*), hare barley (*Hordeum murinum* ssp. *leporinum*), along with various forbs abundant at different times such as American bird's-foot trefoil (*Acmispon americanus*), Chilean bird's-foot trefoil (*Acmispon wrangelianus*), fiddleneck (*Amsinckia* spp.), threeray tarweed (*Deinandra lobbii*), filaree (*Erodium* spp.), lupine (*Lupinus* spp.), burclover (*Medicago polymorpha*), and popcornflower (*Plagiobothrys* spp.). Approximately 22.71 acres of nonnative grassland are present within the project site.

4.4.1.2.6 RUDERAL (DISTURBED)

Ruderal (disturbed) habitat occurs in areas that are regularly disturbed by human activities. Since this is not a native habitat, it is not classified by the MCV. Nonnative species such as those described above for nonnative grassland are the dominant species observed within this habitat type.

Within the project site, ruderal habitat has been altered by past land use practices, development, and ground disturbance and is generally found along road shoulders and unpaved roadways. Vegetative cover is generally low due to disturbance and there is a high percentage of bare soil.

Within the project site, ruderal habitat has been altered by past land use practices, development, and ground disturbance and is generally found along road shoulders and unpaved roadways. Vegetative cover is generally low due to disturbance and there is a high percentage of bare soil.

4.4.1.2.7 DEVELOPED

Developed areas within the project site are not natural habitats and are therefore not classified by the MCV. Developed features within the project site generally include Oak Shores Drive and Lynch Canyon Road, as well as existing residential and agricultural structures. Approximately 7.50 acres of developed space is present within the project site.

4.4.2 Special-Status Species

A discussion of special-status species that have been documented within a 10-mile radius of the project site is provided below.

4.4.2.1 Special-Status Plant Species

For the purposes of this section, special-status plant species are defined as the following:

- Plants listed or proposed for listing as threatened or endangered under the Federal Endangered Species Act (FESA) (50 Code of Federal Regulations [CFR] Section 17.12 for listed plants and various notices in the Federal Register for proposed species).
- Plants that are candidates for possible future listing as threatened or endangered under the FESA.
- Plants that meet the definitions of rare or endangered species under CEQA (State CEQA Guidelines Section 15380).
- Plants considered by the CNPS to be "rare, threatened, or endangered" in California (Ranks 1B and 2 in CNPS 2018).
- Plants listed by CNPS as plants about which we need more information and plants of limited distribution (Ranks 3 and 4 in CNPS 2018).
- Plants listed or proposed for listing by the State of California as threatened or endangered under the California Endangered Species Act (CESA) (14 California Code of Regulations [CCR] Section 670.5).
- Plants listed under the California Native Plant Protection Act (California Fish and Game Code Section 1900 et seq.).
- Plants considered sensitive by other Federal agencies (i.e., United States Forest Service, Bureau of Land Management), state and local agencies, or jurisdictions.

Based on the literature review for this project, a total of 73 special-status plant species have been documented within a 10-mile radius of the project site (Appendix C). Because the plant list presented in Appendix C is considered regional, SWCA evaluated the listed species to identify which special-status plant species have the potential to occur within the project site. This analysis compared the known habitat requirements of those 73 species to the existing conditions, elevation, and soils within the project site. It was determined that 60 special-status plant species have potential to occur within the project site based on

suitable habitat conditions (Appendix C). Botanical surveys were conducted in 2 consecutive years during the appropriate blooming period for all special-status plants with potential to occur in the project site. Only one special-status plant, Paso Robles navarretia, was observed during botanical surveys conducted within the project area during the appropriate blooming period. Paso Robles navarretia is listed as a CNPS Rank 4.3 species. Plants with a California Rare Plant Rank of 4 are of limited distribution or infrequent throughout a broader area in California. Threat CNPS Rank 4 is applied to plants of limited distribution; however, plants that are only listed as Rank 4 are not considered to be rare, threatened, or endangered in California. Additionally, the CNPS Threat Rank 0.3 (i.e., Rank 4.3) is applied to plants that are not very threatened in California (less than 20% of occurrences threatened/low degree and immediacy of threat or no current threats known).

Additionally, one sensitive natural community, purple needlegrass grassland, was observed within the project site. Species lists and a list of plant species observed within the project site during surveys is included in Appendix C.

4.4.2.2 Special-Status Animal Species

For the purposes of this section, special-status animal species are defined as the following:

- Animals listed or proposed for listing as threatened or endangered under the FESA (50 CFR Section 17.11 for listed animals and various notices in the Federal Register for proposed species).
- Animals that are candidates for possible future listing as threatened or endangered under the FESA.
- Animals that meet the definitions of rare or endangered species under CEQA (State CEQA Guidelines Section 15380).
- Animals listed or proposed for listing by the State of California as threatened and endangered under the CESA (14 CCR Section 670.5).
- Animal species of special concern to CDFW.
- Animal species that are fully protected in California (California Fish and Game Code, Section 3511 [birds], Section 4700 [mammals], and Section 5050 [reptiles and amphibians]).

Based on a CNDDB query and a review of existing literature, a total of 33 special-status animal species have been documented within a 10-mile radius of the project site (Appendix C). In addition, the "other nesting birds" category was included based on the numerous species of nesting birds protected by the federal Migratory Bird Treaty Act (MBTA) and California Fish and Game Code that have the potential to nest within the project site. Because this list of species is considered regional, an analysis of the range and habitat preferences of those animal species was conducted to identify which sensitive wildlife species have the potential to occur within the project site. SWCA determined that the following nine special-status animal species have potential to occur within or near the project site: San Joaquin whipsnake (*Masticophis flagellum ruddocki*), coast horned lizard (*Phrynosoma blainvillii*), golden eagle (*Aquila chrysaetos*), California horned lark (*Eremophila alpestris actia*), bald eagle (*Haliaeetus leucocephalus*), pallid bat (*Antrozous pallidus*), hoary bat (*Lasiurus cinereus*), Monterey dusky-footed woodrat (*Neotoma macrotis luciana*), American badger (*Taxidea taxus*), and other nesting birds.

Although these species may have the potential to occur within or adjacent to the project site based on presence of suitable foraging, roosting, or nesting habitat, only a single coast horned lizard was observed within the project site during the field surveys conducted by SWCA. However, the potential for these species to occur within the project site cannot be ruled out due to the mobile nature of these species. Foraging bird species without nesting and/or wintering habitat in the project site have been excluded from

further impact analysis due to their highly transitory nature, the likelihood that they would avoid foraging in work areas during construction, and the unlikelihood for direct impacts or take of birds during their foraging activities.

4.4.2.3 Wildlife Corridors and Migration

The California Essential Habitat Connectivity Project was queried for Essential Habitat Connectivity, which are the best available data describing important areas for maintaining connectivity between large blocks of land for wildlife corridor purposes (CDFW 2010). These important areas are referred to as Essential Connectivity Areas. Essential Connectivity Areas are only intended to be a broad-scale representation of areas that provide essential connectivity. The project site is located within an Essential Connectivity Area that appears to connect the Nacimiento reservoir with San Antonio Lake, Harris Creek, and several other creeks. For the purposes of this analysis, it is reasonable to assume that the undeveloped land and intermittent drainages within the project site may be used by wildlife as movement corridors on a smaller scale.

4.4.3 Regulatory Overview

4.4.3.1 Federal Policies and Regulations

4.4.3.1.1 FEDERAL ENDANGERED SPECIES ACT OF 1973

The FESA provides legislation to protect federally listed plant and animal species. If there is no federal nexus (e.g., federal funding, federal permitting, or other federal authorization), impacts to federally listed species must be mitigated via FESA Section 10 with a Habitat Conservation Plan. No FESA-listed species were observed during surveys of the project site and no FESA-listed species are anticipated to be affected by the proposed project.

4.4.3.1.2 MIGRATORY BIRD TREATY ACT OF 1918

The MBTA protects all migratory birds, including their eggs, nests, and feathers. The MBTA was originally drafted to put an end to the commercial trade in bird feathers, popular in the latter part of the 1800s. The MBTA is enforced by the USFWS, and potential impacts to species protected under the MBTA are evaluated by the USFWS in consultation with other federal agencies. No nesting migratory birds or vacant nests were observed during surveys of the project site. However, the project site supports suitable nesting habitat and the proposed project must comply with the MBTA.

4.4.3.1.3 BALD AND GOLDEN EAGLE PROTECTION ACT OF 1940

The Bald and Golden Eagle Protection Act, enacted in 1940, prohibits anyone, without a permit issued by the Secretary of the Interior, from "taking" bald eagles, including their parts, nests, or eggs. The act provides criminal penalties for persons who "take, possess, sell, purchase, barter, offer to sell, purchase or barter, transport, export or import, at any time or any manner, any bald eagle ... [or any golden eagle], alive or dead, or any part, nest, or egg thereof." The act defines "take" as "pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, molest or disturb." The Bald and Golden Eagle Protection Act is enforced by the USFWS, and potential impacts to bald and golden eagles are evaluated by the USFWS in consultation with other federal agencies. No nesting bald or golden eagles or vacant nests were observed during surveys of the project area; however, the project site supports suitable nesting and foraging habitat for golden and bald eagles.

4.4.3.1.4 SECTION 404 OF THE CLEAN WATER ACT OF 1977

The U.S. Army Corps of Engineers (USACE) regulates discharges of dredged or fill material into waters of the United States. These waters include wetland and non-wetland water bodies that meet specific criteria. USACE jurisdiction regulates almost all work in, over, and under waters listed as "navigable waters of the U.S." that results in a discharge of dredged or fill material within USACE regulatory jurisdiction, pursuant to Section 404 of the Clean Water Act (CWA). Under Section 404, USACE regulates traditional navigable waters, wetlands adjacent to traditional navigable waters, relatively permanent non-navigable tributaries that have a continuous flow at least seasonally (typically 3 months), and wetlands that directly abut relatively permanent tributaries. USACE will determine jurisdiction over waters that are non-navigable tributaries, that are not relatively permanent and wetlands adjacent to non-navigable tributaries, and that are not relatively permanent only after making a significant nexus finding. Waters of the United States are defined in 33 CFR 328.3 as:

> *(1) All waters which are currently used, were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide;*
>
> *(2) All interstate waters, including interstate wetlands;*
>
> *(3) The territorial seas;*
>
> *(4) All impoundments of waters otherwise identified as waters of the United States under this section;*
>
> *(5) All tributaries, as defined in paragraph (c)(3) of this section, of waters identified in paragraphs (a)(1) through (3) of this section;*
>
> *(6) All waters adjacent to a water identified in paragraphs (a)(1) through (5) of this section, including wetlands, ponds, lakes, oxbows, impoundments, and similar waters.*

USACE jurisdiction over non-tidal waters of the United States extends laterally to the ordinary high water mark (OHWM) or beyond the OHWM to the limit of any adjacent wetlands, if present (33 CFR 328.4). The OHWM is defined in 33 CFR 328.3 as:

> *". . . that line on the shore established by the fluctuations of water and indicated by physical characteristics such as a clear, natural line impressed on the bank, shelving, changes in the character of soil, destruction of terrestrial vegetation, the presence of litter and debris, or other appropriate means that consider the characteristics of the surrounding areas."*

The project site supports several drainages considered potentially jurisdictional non-wetland waters of the United States that may be impacted; therefore, a Section 404 permit may be required.

4.4.3.1.5 SECTION 401 OF THE CLEAN WATER ACT OF 1977

Section 401 of the CWA and its provisions ensure that federally permitted activities comply with the CWA and state water quality laws. Section 401 is implemented through a review process that is conducted by the Regional Water Quality Control Board (RWQCB) and is triggered by the Section 404 permitting process (see above). RWQCB certifies via the Section 401 process that a proposed project complies with applicable effluent limitations, water quality standards, and other conditions of California law. Evaluating the effects of the proposed project on both water quality and quantity (runoff) falls under the jurisdiction of RWQCB. The project site supports several drainages considered potentially

jurisdictional non-wetland waters of the United States that may be impacted; therefore, a Section 401 permit may be required.

4.4.3.2 State Policies and Regulations

4.4.3.2.1 CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) OF 1970 (PUBLIC RESOURCES CODE SECTIONS 21000–21177; GUIDELINES AT SECTION 15000 ET SEQ.)

The State CEQA Guidelines stipulate that a plant or animal that is not listed but can be shown to meet criteria for listing under the CESA (see below) shall be given the same consideration as a listed species.

4.4.3.2.2 CALIFORNIA ENDANGERED SPECIES ACT OF 1984 (CALIFORNIA FISH AND GAME CODE SECTION 2050 ET SEQ.)

The CESA ensures legal protection for plants listed as rare or endangered, and wildlife species formally listed as endangered or threatened, and also maintains a list of California Species of Special Concern (SSC). SSC status is assigned to species that have limited distribution, declining populations, diminishing habitat, or unusual scientific, recreational, or educational value. Under state law, the CDFW is empowered to review projects for their potential to impact special-status species and their habitats. Under CESA, CDFW reserves the right to request the replacement of lost habitat that is considered important to the continued existence to CESA-protected species.

4.4.3.2.3 CALIFORNIA FISH AND GAME CODE

California Fish and Game Code Section 3511 includes provisions to protect Fully Protected species, such as: (1) prohibiting take or possession "at any time" of the species listed in the statute, with few exceptions; (2) stating that "no provision of this code or any other law shall be construed to authorize the issuance of permits or licenses to "take" the species; and (3) stating that no previously issued permits or licenses for take of the species "shall have any force or effect" for authorizing take or possession. CDFW is unable to authorize incidental take of "fully protected" species when activities are proposed in areas inhabited by those species. Sections 3503 and 3503.5 of the Fish and Game Code state that it is unlawful to take, possess, or destroy the nest or eggs of any bird, with occasional exceptions. In addition, Section 3513 states that it is unlawful to take or possess any migratory bird as designated in the MBTA or any part of such migratory birds except as provided by rules and regulations under provisions of the MBTA. No nesting migratory birds or vacant nests were observed during surveys of the project site. However, the project site supports suitable nesting habitat for migratory birds as well as Fully Protected Species (i.e., golden eagle and bald eagle [*Haliaeetus leucocephalus*]; therefore, the proposed project must comply with the California Fish and Game Code.

CDFW also manages the California Native Plant Protection Act of 1977 (Fish and Game Code Section 1900, et seq.), which was enacted to identify, designate, and protect rare plants. In accordance with CDFW guidelines, CNPS 1B list plants are considered "rare" under the CESA and are evaluated in CEQA documents.

Fully Protected species may not be taken or possessed without a permit from the Fish and Game Commission and/or CDFW. Information on these species can be found within Section 3511 (birds), Section 4700 (mammals), Section 5050 (reptiles and amphibians), and Section 5515 (fish) of the Fish and Game Code.

4.4.3.2.4 CALIFORNIA FISH AND GAME CODE SECTIONS 1600–1602

Pursuant to Division 2, Chapter 6, Sections 1600–1602 of the California Fish and Game Code, CDFW regulates all diversions, obstructions, or changes to the natural flow or bed, channel, or bank of any river, stream, or lake, which supports fish or wildlife. CDFW defines a "stream" (including creeks and rivers) as "a body of water that flows at least periodically or intermittently through a bed or channel having banks and supports fish or other aquatic life. This includes watercourses having surface or subsurface flow that supports or has supported riparian vegetation." CDFW's definition of "lake" includes "natural lakes or man-made reservoirs." CDFW jurisdiction within altered or artificial waterways is based upon the value of those waterways to fish and wildlife.

If CDFW determines that a project may adversely affect existing fish and wildlife resources, a Lake or Streambed Alteration Agreement (LSAA) is required. An LSAA lists the CDFW conditions of approval relative to the proposed project, and serves as an agreement between an applicant and CDFW for a term of not more than 5 years for the performance of activities subject to this section. Several intermittent drainages considered jurisdictional by CDFW and subject to Section 1602 LSAA notification extend through the project site and through proposed project impact areas; therefore, it is expected that an LSAA would be required for the project.

4.4.3.2.5 STATE WATER RESOURCES AND REGIONAL WATER QUALITY CONTROL BOARDS

The State Water Resources Control Board (SWRCB) and nine RWQCBs regulate discharges of fill and dredged material in California, under Section 401 of the CWA and the State Porter-Cologne Water Quality Control Act, through the State Water Quality Certification Program. State Water Quality Certification is necessary for all projects that require a USACE permit, or fall under other federal jurisdiction, and have the potential to impact waters of the State. Waters of the State are defined by the Porter-Cologne Act as:

> *"any surface water or groundwater, including saline waters, within the boundaries of the state."*

In order for a Section 404 permit to be valid, Section 401 of the CWA requires a Water Quality Certification or waiver to be obtained. The Water Quality Certification (or waiver) determines that the permitted activities will not violate water quality standards individually or cumulatively over the term of the action. Water quality certification must be consistent with the requirements of the CWA, CEQA, CESA, and Porter-Cologne Act.

The SWRCB defines a wetland area as:

> *"an area is wetland if, under normal circumstances, (1) the area has continuous or 129 recurrent saturation of the upper substrate caused by groundwater, or shallow surface 130 water, or both; (2) the duration of such saturation is sufficient to cause anaerobic 131 conditions in the upper substrate; and (3) the area either lacks vegetation or the 132 vegetation is dominated by hydrophytes."*

The SWRCB generally adheres to the same delineation protocol set forth by the USACE; however, it allows for adjustments to the procedures in the 1987 Corps of Engineers Wetlands Delineation Manual and Supplements, as appropriate, to allow for the delineation of non-vegetated wetlands, as defined under the SWRCB wetland definition. As discussed in Sections 4.1.4 and 4.2.2.1, several potentially jurisdictional USACE and CDFW intermittent drainages extend through the project site and through the

proposed project impact areas; therefore, it is expected that a Section 401 permit would be required for the project.

4.4.3.3 Local Policies and Regulations

4.4.3.3.1 COUNTY OF SAN LUIS OBISPO GENERAL PLAN

Conservation and Open Space Element

The intent of the goals, policies, and implementation strategies in the COSE is to identify and protect biological resources that are a critical component of the county's environmental, social, and economic well-being. Biological resources include major ecosystems; threatened, rare, and endangered species and their habitats; native trees and vegetation; creeks and riparian areas; wetlands; fisheries; and marine resources. Individual species, habitat areas, ecosystems and migration patterns must be considered together in order to sustain biological resources.

4.4.4 Thresholds of Significance

According to the State CEQA Guidelines, the project would have a significant impact if it would:

a. Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS.

b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations, or by the CDFW or USFWS.

c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.

d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

e. Conflict with any local policies or ordinances protecting biological resources, such as a tree protection policy or ordinance, or conflict with any regional plans or policies to protect sensitive species, or regulations of the CDFW or USFWS.

f. Conflict with the provisions of an adopted Habitat Conservation Plan (HCP) or Natural Community Conservation Plan (NCCP).

4.4.5 Impact Assessment and Methodology

4.4.5.1 Literature Review

Prior to conducting field surveys, SWCA conducted a literature review to gain insight on what species have known occurrences in the project vicinity. The review was initiated with a query of the most recent version of the CDFW CNDDB to identify reported occurrences of sensitive resources within the Tierra Redonda Mountain U.S. Geological Survey (USGS) 7.5-minute quadrangle and the surrounding eight quadrangles: Williams Hill, Hames Valley, Wunpost, Bryson, Bradley, Pebblestone Shut-in, Lime Mountain, and Adelaida.

In addition to the CNDDB query, the CNPS Electronic Inventory of Rare and Endangered Plants of California and the USFWS IPaC database were reviewed to provide additional information on rare species with documented occurrences in the area. Existing environmental documents and various reports prepared by SWCA were also reviewed for background information and recent findings information. Copies of the species lists generated during the literature review are included in Appendix C.

4.4.5.2 Field Survey

Following the literature review, SWCA Senior Biologist Geoff Hoetker conducted field surveys on March 31 and May 28, 2016, and January 27, 2018. The project site for the proposed project includes the Gregg Ranch, the 2.0-mile-long force main pipeline alignment and associated lift station, and a 50-foot buffer around all project components. The total project site encompasses approximately 56.88 acres.

The purpose of the field surveys was to: (1) characterize the existing conditions within the project area; and (2) identify those biological resources that could be impacted by future development. During the survey, SWCA inventoried botanical resources within the project site using dichotomous keys as necessary (SWCA 2016). Wildlife species were documented based on visual observation, auditory cues (i.e., calls and songs), and indirect signs (e.g., tracks, scat, skeletal remains, burrows, etc.). A list of species observed is included in Appendix C.

4.4.5.3 Impact Assessment

This impact assessment focused on identifying potential project-related impacts associated with implementation of the project, and was based on details presented within the project description. Identified impacts represent a reasonable worst-case scenario based on the provided project plans. Potential impacts were expected to occur where proposed construction or development activities would result in temporary or permanent modification of sensitive communities or habitats occupied by special-status species. Impacts to biological resources within the study area were evaluated by determining the sensitivity, significance, or rarity of each resource that would be adversely affected by the proposed project, and thresholds of significance were applied to determine if the impact constituted a significant impact. The significance threshold may be different for each habitat or species and is based on the resource's rarity or sensitivity and the level of impact that would result from the proposed project. Where potential project-related impacts to sensitive resources were identified, measures for avoiding or minimizing adverse effects to these resources were recommended.

4.4.6 Project-Specific Impacts and Mitigation Measures

4.4.6.1 Substantial Adverse Effect on Special-Status Plant and Animal Species

4.4.6.1.1 SPECIAL-STATUS PLANTS

Vegetation communities observed within the project site include: blue oak woodland, California sagebrush scrub, bigberry manzanita chaparral, purple needlegrass grassland, nonnative grassland, ruderal (disturbed), and developed (see Figures 4.4-1 and 4.4-2). Estimated temporary and permanent impacts to natural communities associated with the proposed project are shown on Figures 4.4-3 and 4.4-4 and detailed in Table 4.4-1 below. Permanent impacts associated with the proposed project include the areas within the project site that will be permanently altered by the proposed project components, including the new permanent disposal site consisting of a storage pond and spray fields at Gregg Ranch, the at-grade manhole access component of the lift station, and new sludge drying beds. The remainder of the project site that would not be permanently impacted by the new project components was considered to have the

potential to be temporarily impacted by construction activities to capture the worst-case scenario impacts associated with the proposed project. Actual temporary impacts associated with the project may be less than the extent identified in Table 4.4-1 and Figures 4.4-3 and 4.4-4.

Table 4.4-1. Natural Communities Impacts within the Project Area

Habitat Type	Total Area in Project Area (acres)	Impacts (acres)*	
		Temporary	Permanent
Blue oak woodland	18.84	9.98	8.86
California sagebrush scrub	3.93	0.38	3.55
Bigberry manzanita chaparral	1.81	1.81	0.00
Purple needlegrass grassland	0.20	0.20	0.00
Nonnative grassland	22.71	9.04	13.69
Ruderal (disturbed)	1.88	1.74	0.13
Developed	7.50	7.50	0.01
TOTAL	**56.87**	**30.65**	**26.24**

*Impact acreages are estimated to capture worst-case scenario impacts associated with the project; actual project impacts may vary.

A total of 73 special-status plant species have been documented in a 10-mile radius of the project site (Appendix C). Based on habitat conditions observed within the project area, it was determined that 60 special-status plant species have potential to occur within the project site based on suitable habitat; however, only one special-status plant, Paso Robles navarretia, was observed during botanical surveys conducted within the project area during the appropriate blooming period. Because Paso Robles navarretia is a CNPS Rank 4.3 species, and because only two plants were observed within the project area, implementation of the proposed project would not substantially affect the population or result in significant impacts to special-status plant species.

4.4.6.1.2 SPECIAL-STATUS ANIMALS

SWCA determined that the following special-status animal species have potential to occur within, or directly adjacent to the project area: San Joaquin whipsnake, coast horned lizard, bald eagle, golden eagle, other nesting birds, Monterey dusky-footed woodrat, American badger, and roosting bats. Although the species listed above may have the potential to occur within or adjacent to the project site based on presence of suitable foraging, roosting, or nesting habitat, only a single coast horned lizard was observed within the project site during the field surveys conducted by SWCA. However, the potential for these species to occur cannot be ruled out due to the transitory nature of these wildlife species.

Implementation of the proposed project has the potential to result in direct and indirect impacts to sensitive wildlife species, if present within the project site at the time of construction. Direct impacts may include injury or mortality resulting from the use and movement of construction equipment and materials and the movement of construction workers within the project site. Potential indirect impacts associated with the proposed project may include the modification or disturbance of suitable habitat, indirect forms of disturbance such as the generation of noise, vibration, and dust. A discussion of potential project-specific impacts has been provided below for each species identified as having the potential to occur within the project site.

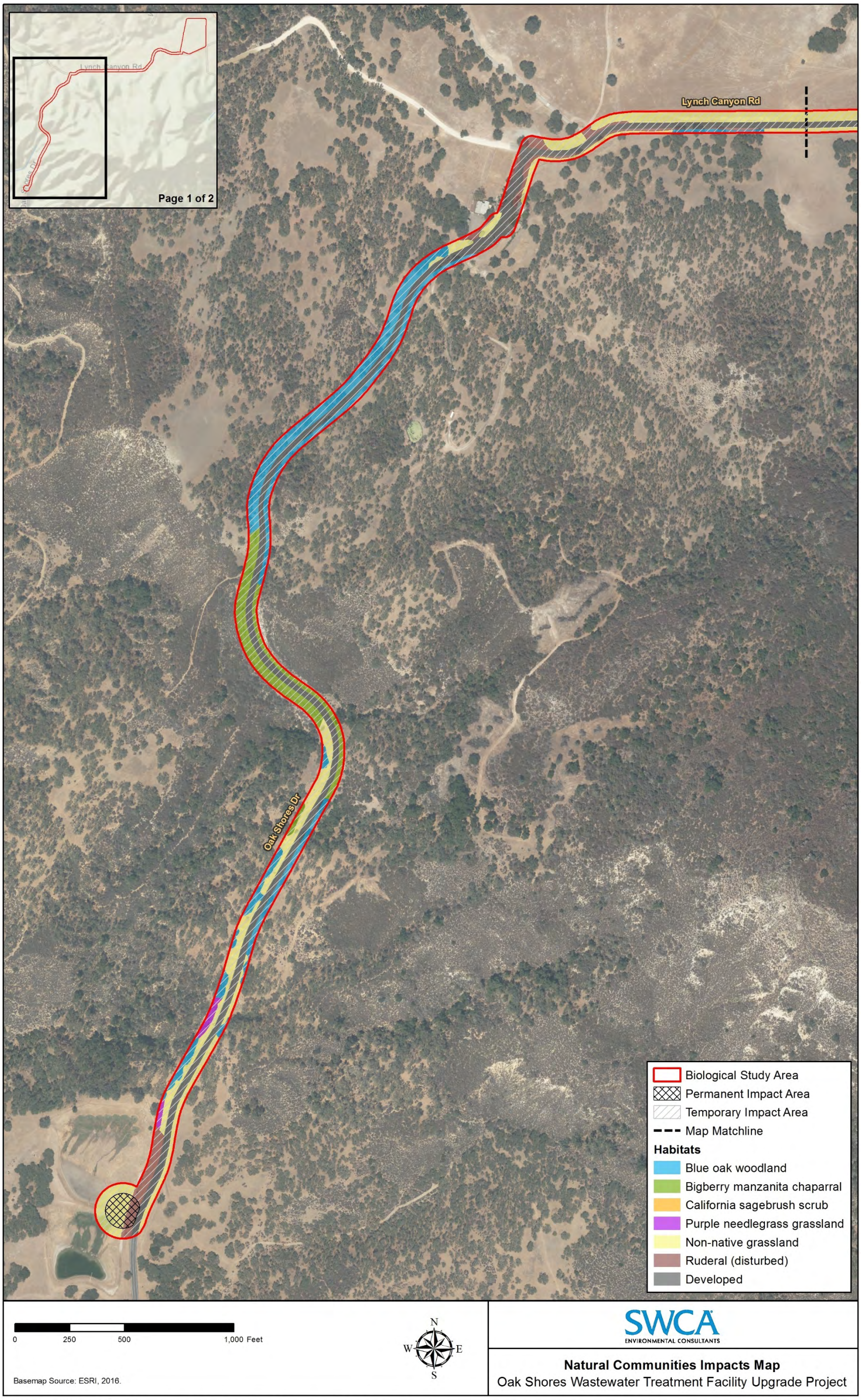


Figure 4.4-3. Natural communities impact map (sheet 1 of 2).

This page intentionally left blank.

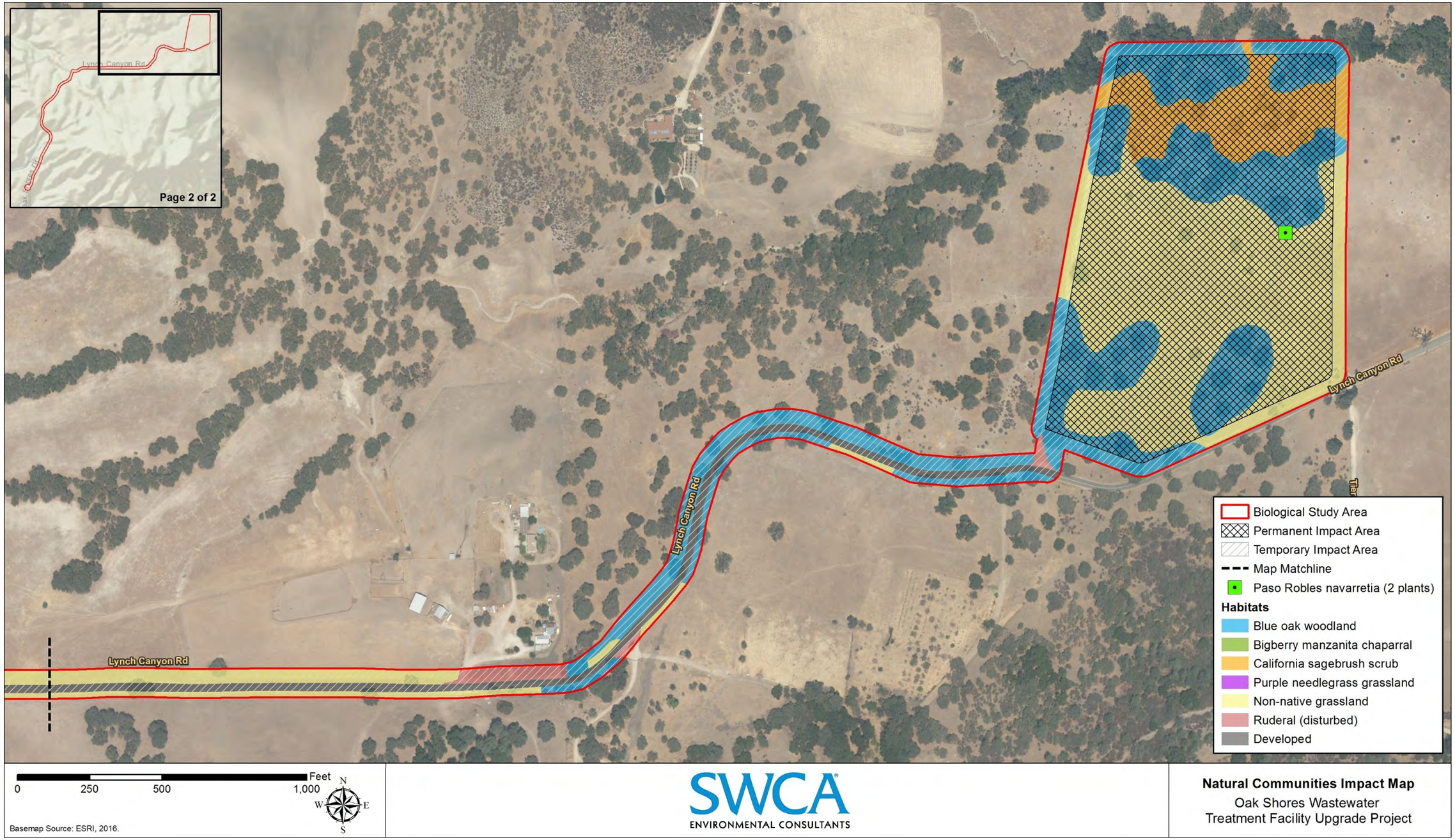


Figure 4.4-4. Natural communities impact map (sheet 2 of 2).

This page intentionally left blank.

San Joaquin Whipsnake

San Joaquin whipsnake is recognized by CDFW as an SSC. Whipsnakes are common to uncommon species found in arid regions below 6,000 feet in California (California Herps.com 2018). The known range of this California endemic species extends from 8 miles west of the community of Arbuckle in Colusa County in the Sacramento Valley, southward to the Grapevine in the Kern County portion of the San Joaquin Valley, and westward into the inner South Coast Ranges. They occur in open, dry, vegetative associations with little or no tree cover. In the western San Joaquin Valley, the San Joaquin whipsnake occurs in valley grassland and saltbush scrub associations and is known to climb bushes such as *Atriplex* for viewing prey and potential predators. They use mammal burrows for refuge and possibly for oviposition sites. Whipsnakes occur in open terrain and are most abundant in grass, desert scrub, chaparral, and pasture habitats. Whipsnakes seek cover in rodent burrows, bushes, trees, and rock piles. They hibernate in soil or sand approximately 1 foot below the surface, sometimes at the bases of plants (CaliforniaHerps 2018). Their diet consists of rodents, lizards and eggs, snakes (including rattlesnakes), birds and eggs, young turtles, insects, and carrion (CaliforniaHerps 2018).

Whipsnakes actively search for prey, with their heads elevated. They poke their heads in burrows, or climb trees, using both vision and olfaction to detect prey, which is consumed alive and whole (CaliforniaHerps 2018). San Joaquin whipsnakes mate in April and May, they lay their eggs in June and July, and the first young appear in late August or early September. Their clutch size ranges from four to 16 eggs with a mean of eight to 10 (CaliforniaHerps 2018).

The project site supports suitable grassland habitat for this species. The nearest documented CNDDB occurrence of this species is located approximately 9.65 miles east of the project site (CNDDB Occ. 86). This species was not observed within the project site but is considered to have the potential to occur.

Potential project impacts to San Joaquin whipsnake include direct impacts (injury or mortality) associated with the use and movement of construction equipment, construction materials and debris, vegetation and/or tree removal, and worker foot traffic. Indirect impacts of construction activities, including destruction or modification of habitat and generation of noise, vibration, and dust may cause temporary disturbance to these species, if present, and may cause them to leave burrows and migrate to adjacent work areas. The indirect effects of erosion and sedimentation could also impact San Joaquin whipsnake through destruction of burrows. Recommended mitigation measures have been included to avoid and/or reduce impacts to San Joaquin whipsnake.

Coast Horned Lizard

Coast horned lizard is recognized by CDFW as an SSC. This flat-bodied lizard has a wide oval-shaped body, scattered enlarged pointed scales on the upper body and tail, and a large crown of horns or spines on the head (CaliforniaHerps 2018). Coast horned lizards were historically distributed along the Pacific coast extending from the border of Baja California west of the deserts and the Sierra Nevada, north to the Bay Area, and inland as far north as Shasta Reservoir, and south into Baja California. This historical range has been severely fragmented due to land alteration and loss of habitat. Coast horned lizards inhabit open areas of sandy soil and low vegetation in a variety of habitat types including valleys, foothills, semiarid mountains, grasslands, coniferous forests, woodlands, and chaparral with open areas and patches of loose soil. They are frequently found in lowlands along sandy washes with scattered shrubs and long dirt roads. Coast horned lizards are generally active aboveground when weather conditions are appropriate (i.e., when they are not exposed to extreme heat or cold temperatures). They primarily prey upon ants but also consume other small insects, such as spiders, beetles, termites, flies, honeybees, moth larvae, and grasshoppers.

The project site supports suitable scrub and grassland habitat for this species. The nearest documented occurrence of this species is located approximately 10 miles northeast of the project site (CNDDB Occ. 686). A single individual of the species was observed within the scrub habitat within the project site along Oak Shores Drive and is therefore considered to be present.

Potential project impacts to coast horned lizard include direct impacts (injury or mortality) associated with the use and movement of construction equipment, construction materials and debris, vegetation and/or tree removal, and worker foot traffic. Indirect impacts of construction activities, including destruction or modification of habitat and generation of noise, vibration, and dust may cause temporary disturbance to these species, if present, and may cause them to leave burrows and migrate to adjacent work areas. The indirect effects of erosion and sedimentation could also impact coast horned lizard through destruction of burrows. Recommended mitigation measures have been included to avoid and/or reduce impacts to coast horned lizard.

Bald Eagle and Golden Eagle

The bald eagle was listed as federally and state endangered in 1971 and then proposed for delisting in 1999. Currently, the species is state listed as endangered, is protected by the Federal Bald and Golden Eagle Protection Act, and is considered a State Fully Protected species; no take authorization can be granted. The bald eagle is a large, dark brown raptor that weighs about 8 to 14 pounds and has a wingspan of 6.5 to 8 feet. Adults have a white head and tail. They are rare or uncommon to locally fairly common winter visitor from October to late March and early April. The breeding range is mainly in mountainous habitats of northern California and the Central Coast Range near reservoirs, lakes and rivers. Nests are built in the upper canopy of large trees, usually conifers. In most of California, the breeding season lasts from about January through July or August. Bald eagles winter throughout the state in areas that have medium to large bodies of water where their main food source is from fish.

The golden eagle is protected by the Federal Bald and Golden Eagle Protection Act and is considered a State Fully Protected species; no take authorization can be granted. The golden eagle is one of the largest birds in North America, is dark brown with a golden sheen on the back of the head and neck. Gold eagles typically favor partially or completely open country, particularly around mountains, hills, and cliffs. They use a variety of habitats ranging from arctic to desert, including tundra, shrublands, grasslands, coniferous forests, farmland, and areas along rivers and streams. Golden eagles prey mainly on small to medium-sized mammals, including hares, rabbits, ground squirrels, prairie dogs, and marmots.

The project site supports suitable nesting habitat within the blue oak woodland habitat and suitable foraging habitat within the nonnative grassland, ruder, chaparral, and scrub habitats for bald eagles and golden eagles. No bald eagles or golden eagles or signs of active or abandoned nests were observed during surveys of the project area; however, these species are considered to have the potential to occur. The nearest documented occurrence of bald eagle is a record from 1997, located near the project site, approximately 0.6 mile east of the intersection of Oak Shores Drive and Lynch Canyon Road (CNDDB Occ. 216). The nearest documented occurrence of golden eagle is located approximately 8.5 miles southwest of the project site (CNDDB Occ. 140).

Potential impacts to bald and golden eagles include direct impacts (injury or mortality) associated with the use and movement of construction equipment, construction materials and debris, and vegetation and/or tree removal within the project site, if these species are nesting within proposed impact areas. Indirect impacts of construction activities, including destruction or modification of habitat and generation of noise, vibration, and dust may cause temporary disturbance to these species, if present. Recommended mitigation measures have been included to avoid impacts to bald and golden eagles.

Class Aves: Other Migratory Bird Species (Nesting)

Ferruginous hawk (*Buteo regalis*), California horned lark, and other nesting birds protected under the MBTA have the potential to occur within the project site. Various bird species may have the potential to only occasionally forage, but not nest, within the project site and are not considered further.

The project site supports suitable wintering habitat for ferruginous hawk and marginal nesting habitat for California horned lark. Suitable nesting habitat for various other migratory birds occurs within the project site. None of these species, nor any active or abandoned nests were observed during surveys of the project site.

The nearest documented occurrence of ferruginous hawk is located approximately 12.38 miles east of the project site (CNDDB Occ. 75). The nearest documented occurrence of California horned lark is located approximately 13.75 miles northeast of the project site (CNDDB Occ. 59). The project site is located within historical occurrences of prairie falcon (CNDDB Occs. 182 and 274) but this species is not expected to nest in the project site due to a lack of cliff nesting habitat.

Potential impacts to ferruginous hawk, California horned lark, and other MBTA-protected birds include direct impacts (injury or mortality) associated with the use and movement of construction equipment, construction materials and debris, and vegetation and/or tree removal within the project site, if these species are nesting within proposed impact areas. Indirect impacts of construction activities, including destruction or modification of habitat and generation of noise, vibration, and dust may cause temporary disturbance to these species, if present. Recommended mitigation measures have been included to avoid and/or reduce impacts to migratory birds.

Roosting Bats

Roosting bats are protected under CEQA; CDFW is responsible for administering CEQA relative to roosting bats. Large blue oak trees within and adjacent to the project site have the potential to support bat species, including pallid bat, hoary bat, and Townsend's big-eared bat (*Corynorhinus townsendii*).

The project site supports suitable roosting habitat for pallid bat and hoary bat within scrub and woodland habitats. No evidence of roosting bats was observed during surveys of the project area; however, they are considered to have the potential to occur.

The nearest recorded occurrences for these species are 12 miles east of the project site for pallid bat (CNDDB Occ. 213), 3.25 miles west for Townsend's big-eared bat (CNDDB Occ. 344), and 10 miles east of the project site for hoary bat (CNDDB Occ. 111).

Potential impacts to bat species include direct impacts (injury or mortality) associated with the use and movement of construction equipment, construction materials and debris, and vegetation and/or tree removal within the project site, if these species are roosting within proposed impact areas. Indirect impacts of construction activities, including destruction or modification of habitat and generation of noise, vibration, and dust may cause temporary disturbance to these species, if present. Recommended mitigation measures have been included to avoid and/or reduce impacts to roosting bats.

Monterey Dusky-Footed Woodrat

The Monterey dusky-footed woodrat is considered an SSC by the CDFW. This subspecies occurs in coastal central California and prefers habitats that exhibit a moderate vegetative canopy, with a brushy understory. Dusky-footed woodrats primarily breed in the spring; however, breeding activities may continue throughout the year during favorable conditions. This species can have multiple litters during the

year. Nests (middens) are typically built of sticks and leaves at the base of, or within, a tree or shrub, or at the base of a hill. Middens may measure up to eight feet in height and diameter. This nocturnal species forages on the ground and primarily feeds on woody plants, but also eats fungi, flowers, grasses, and acorns.

The project site supports suitable scrub and woodland habitat for Monterey dusky-footed woodrat. The nearest documented occurrence of this species is located approximately 11.25 miles southeast of the project site (CNDDB Occ. 6). No Monterey dusky-footed woodrats, woodrat middens, nests, or other sign were observed during surveys of the project site but is considered to have the potential to occur.

Potential project impacts to Monterey dusky-footed woodrat include direct impacts (injury or mortality) associated with the use and movement of construction equipment, construction materials and debris, and vegetation and/or tree removal within the project site, if this species is present within proposed impact areas. Indirect impacts of construction activities, including destruction or modification of habitat/woodrat nests and generation of noise, vibration, and dust may cause temporary disturbance to these species, if present. Recommended mitigation measures have been included to avoid and/or reduce impacts to Monterey dusky-footed woodrat.

American Badger

American badger is recognized by CDFW as an SSC. The American badger is a broad, robust mammal with a flattened body, tick neck, and short, stout legs. The fur is grayish and grizzled with black, and a badge-like black marking on the face accentuated by white fur that extends from the face rearward. The ears are rather short, its snout appears slightly upturned, and the legs are short and stout, black-colored, and well suited for digging. The foreclaws are long and curved and its hind claws are shovel-like. Badgers always adopt a low profile, seeming to hug the ground. American badgers typically inhabit open areas with enough soil to dig in, but can be found from high alpine country to low valleys. They may also frequent brushlands with little groundcover. They seem especially common in large grass and sagebrush meadows and valleys. They feed primarily on small rodents such as ground squirrels, pocket gophers, kangaroo rats, prairie dogs, and mice, most of which they capture by digging into the burrows of these small mammals. Distribution ranges from the Great Lakes states west to Pacific Coast, and from Canadian Prairie Provinces south to the Mexican Plateau (SWCA 2016).

The project site supports marginal shrub, grassland, and woodland habitat for American badger. The nearest documented occurrence of this species is located approximately 8.75 miles southeast of the project site (CNDDB Occ. 375). This species was not observed during surveys of the project site but is considered to have the potential to occur.

Potential project impacts to American badger include direct impacts (injury or mortality) associated with the use and movement of construction equipment, construction materials and debris, and vegetation and/or tree removal within the project site, if this species is present within proposed impact areas. Indirect impacts of construction activities, including destruction or modification of habitat/burrows and generation of noise, vibration, and dust may cause temporary disturbance to these species which may cause them to leave burrows and migrate to adjacent work areas. The indirect effects of erosion and sedimentation could also impact American badger through destruction of burrows. Recommended mitigation measures have been included to avoid and/or reduce impacts to American badger.

In conclusion, implementation of the proposed project has the potential to result in adverse impacts to special-status animal species; however, implementation of mitigation measures provided below would reduce potential impacts to be less than significant.

BIO Impact 1	
Implementation of the proposed project could have a substantial adverse effect, either directly or through habitat modification, on special-status animal species (*Class II, less than significant with mitigation*).	
Mitigation Measures	
BIO/mm-1.1	*Prior to initiation of any site preparation/construction activities, the County shall implement the following:* *a. A County-approved biologist shall conduct a preconstruction survey of the project area no more than 30 days and no less than 14 days prior to the commencement of ground disturbance in previously undisturbed areas of the project site. If any evidence of occupation of that portion of the project site by listed or other special-status plant or animal species is observed, a buffer shall be established by the qualified biologist that results in sufficient avoidance to comply with applicable regulations. If sufficient avoidance cannot be established, the County shall coordinate with the USFWS and/or the CDFW for further guidance to avoid/minimize potential impacts. Copies of the preconstruction survey and results, as well as all permits and evidence of compliance with applicable regulations, shall be submitted to the County.* *b. A County-approved biologist shall conduct an education and training session for all construction personnel. At a minimum, the training will include a description of the natural history of the species with the potential to be affected by the proposed project and their habitats. Training will include the general measures that are being implemented to conserve these species as they relate to the proposed project, the penalties for non-compliance, and the boundaries of the work area within which the project must be accomplished. To ensure that employees and contractors understand their roles and responsibilities, training may have to be conducted in languages other than English.* *c. Because of the potential for impacts to coast horned lizard (observed in scrub habitat within the project site in 2016) and nesting birds, a County-approved biologist shall monitor the removal of trees that could support nesting birds and construction within chaparral/scrub habitats that could support coast horned lizard. Coast horned lizards observed in work areas during monitoring shall be captured and relocated to suitable habitat outside of work areas to avoid injury or mortality. Any proposal for capture and relocation of coast horned lizards shall be coordinated with CDFW prior to construction to ensure these efforts are in compliance with the State of California Fish and Game Code.*
BIO/mm-1.2	*Prior to and during any site preparation and/or construction activities associated with the proposed project, the County shall ensure the following general protective measures are implemented:* *a. Should a special-status species or avian species protected under the MBTA, or their dens/burrows/nests, be discovered within the project boundary, the following shall occur:* *i. All work within 100 feet of the discovery shall cease immediately.* *ii. The Resident Engineer or their onsite designee shall be immediately notified.* *iii. A qualified biologist shall determine if notification and/or consultation with regulatory agencies is required, and how to proceed with the project and avoid take.* *b. Project employees will be directed to exercise caution when commuting within the project area. A 15-mile-per-hour speed limit will be enforced on unpaved roads.* *c. Project employees will be provided with written guidance governing vehicle use, speed limits on unpaved roads, fire prevention, and other hazards.* *d. A litter control program shall be instituted at the project site. All workers shall ensure*

BIO Impact 1	
	their food scraps, paper wrappers, food containers, cans, bottles, and other trash from the project area are deposited in covered or closed trash containers. The trash containers shall be removed from the project area at the end of each working day. *e. No canine or feline pets or firearms (except for federal, state, or local law enforcement officers and security personnel) shall be permitted on construction sites to avoid harassment, killing, or injuring of listed species.* *f. All construction activities shall be confined within the project construction area, as identified on the final construction plans. At no time shall equipment or personnel be allowed to adversely affect areas outside the project site.* *g. All excavated, steep-walled holes or trenches more than 2 feet deep shall be covered at the close of each working day by plywood or similar materials. If the trenches cannot be closed, one or more escape ramps constructed of earthen-fill or wooden planks shall be installed no greater than 200 feet apart. Before such holes or trenches are filled, they shall be thoroughly inspected for trapped special-status species which were identified during the project's education session.* *h. All pipes and culverts shall be searched for species identified during the project's education session prior to being moved or sealed. Should any special-status species be discovered within a pipe or culvert, that section of pipe or culvert shall not be moved or sealed. Any special-status species found in a pipe or culvert shall be allowed to vacate unimpeded.* *i. Tightly woven fiber netting or similar material shall be used for erosion control or other purposes at the project site to ensure that special-status species do not get trapped. This limitation will be communicated to the contractor through use of Special Provisions included in the bid solicitation package.* *j. Use of rodenticides and herbicides at the project site shall be prohibited to prevent primary or secondary poisoning of special-status species and depletion of prey populations on which they depend.*
BIO/mm-1.3	*To protect special-status avian species and those species protected by the MBTA and California Fish and Game Code Section 3503, including bald and golden eagles, which are known to exist in the project vicinity and may start nesting earlier than other species, vegetation clearing and earth disturbance should be avoided from January 1 to September 1. If avoiding construction during this season is not feasible, a qualified biologist shall survey the area within 1 week prior to activity beginning onsite. If nesting birds are located on or near the proposed project site, they shall be avoided until they have successfully fledged. A buffer zone of 50 feet will be placed around all nonsensitive, passerine bird species, and a 250-foot buffer will be implemented for raptor species, and all activity will remain outside of that buffer until the qualified biologist, has determined that the young have fledged. Buffer reductions and/or work within non-disturbance buffer areas can be completed only with approval from relevant resource agencies. If nesting bald or golden eagles are detected during surveys, applicable resource agencies will be consulted for guidance.*
BIO/mm-1.4	*Prior to and during any site preparation and/or construction activities associated with the proposed project, the County shall ensure the following protective measures are implemented to avoid impacts to roosting bats:* *a. Prior to commencement of tree removal associated with construction, the County will schedule tree removal to occur outside of the typical bat maternity roosting and pupping season if possible to avoid potential impacts to bats. The typical bat maternal roosting season is defined as occurring from February 1 to August 31; therefore, tree removal activities should be scheduled to occur from September 1 to February 14, if possible.* *b. Prior to commencement of tree removal associated with construction, if tree removal must occur during the typical bat maternity roosting season (February 1 to September 1), tree-removal activities will not be allowed unless a County-approved, qualified biologist has surveyed the impact area within 14 days prior to*

BIO Impact 1	
	commencement of proposed construction activities and determined that no roosting bats will be adversely impacted. Roosting bat surveys will only be considered valid for 14 consecutive days before they will need to be repeated. At such time, if any evidence of bat roosting is found, the biologist will determine if any construction activities can occur during roosting and to what extent. The results of the surveys will be submitted to the County Environmental Coordinator and the CDFW, possibly with recommendations for variable buffer zones, as needed, around individual roosting sites. Based on the results of the surveys, the County shall implement the following: *i. If no bat roosting activities are detected within the proposed work area, tree-removal and noise-producing construction activities may proceed and no further mitigation is required.* *ii. If bat roosting activity is confirmed during preconstruction roost surveys or at any time during the monitoring of construction activities, at a minimum, work activities will be avoided within 100 feet of active roosts until bats have left the roosts. No trees with active bat roosts may be removed until they have left the roosts or have been excluded from roosts.* *c. Prior to commencement of tree removal associated with construction, if bats would be removed from roosts, the County will prepare a Bat Exclusion Plan to exclude the species from trees scheduled for removal. To reduce impacts to roosting bats, this plan will discuss methods of eliminating bat access to the identified roosting habitat prior to construction so that bats are not able to return to and occupy the roost. The appropriate timing for exclusion implementation will be determined based upon the species identified as occurring within the project site. Roost areas will be surveyed by a qualified biologist prior to implementing exclusion methods to ensure that no bats become trapped. Exclusion methods may include, but are not limited to, wire mesh, spray foam, or fabric placement. This plan will be submitted to the CDFW for regulatory approval.* *d. Following construction, if the County-approved biologist determined that roosting bats used any removed trees at any time for roosting prior to removal, features to enhance bat habitat will be incorporated into the project. Appropriate habitat enhancement features could include the installation of bat boxes on remaining trees to enhance bat night, day and nursery roosting habitat. The design and style of the bat boxes will be appropriate to the species identified utilizing the trees that were removed.*
BIO/mm-1.5	*Prior to and during any site preparation and/or construction activities associated with the proposed project, the County shall ensure the following protective measure is implemented to avoid impacts to Monterey dusky-footed woodrat:* *a. Prior to commencement of tree removal associated with construction, a County-approved, qualified biologist will survey trees scheduled for removal for woodrat nests. Based on the results of the surveys, the County shall implement the following:* *i. If no woodrat nests are observed then grading and ground disturbance activities may proceed and no further mitigation is required.* *ii. If woodrat nests are observed within the project area, the results of the surveys will be submitted to the CDFW, with recommendations for variable buffer zones, as needed, around individual nests and/or relocation of nests and woodrats, if approved by the CDFW.*
BIO/mm-1.6	*Prior to and during any site preparation and/or construction activities associated with the proposed project, the County shall ensure the following protective measure is implemented to avoid impacts to American badger:* *a. Prior to commencement of grading and other ground disturbance activities, a County-approved, qualified biologist will survey the footprint of construction areas*

BIO Impact 1
for active badger dens. Based on the results of the surveys, the County shall implement the following: *i. If no active badger dens are observed, grading and ground disturbance activities may proceed and no further mitigation is required.* *ii. If presence of active badger dens is confirmed during preconstruction surveys or at any time during the monitoring of construction activities, work activities will be avoided within 100 feet of active badger dens. Alternatively, the County Public Works Department may coordinate with the CDFW to determine if badger exclusion or relocation measures are appropriate.*
Residual Impacts
Residual impacts would be less than significant.

4.4.6.2 Substantial Adverse Effect on Riparian Habitat, Jurisdictional Features, or Other Sensitive Natural Community

4.4.6.2.1 WATERS, WETLAND, AND RIPARIAN HABITAT

Several unnamed intermittent drainages extend through the project site (Figure 4.4-5). The drainages present within the western portion of the project site along Oak Shores Drive (see Figure 4.4-5: Drainages 1–4) have hydrologic connectivity with the Pacific Ocean via Kavanaugh Creek, the Nacimiento Reservoir, the Nacimiento River, and the Salinas River, which drains to the Pacific Ocean. The drainage in the northeast portion of the project site (see Figure 4.4-5: Drainage 5) also has hydrologic connectivity to the Salinas River and Pacific Ocean via Harris Creek, San Antonio Lake, and the San Antonio River.

No evidence of surface water flow or riparian vegetation was observed within the drainages during surveys of the project area; it is expected that these drainages only support flow immediately following rain events. Therefore, based on the presence of bed and bank features, as well as OHWM, and hydrologic connectivity to the Pacific Ocean, the drainages within the project site are considered potentially jurisdictional under the USACE, CDFW, and SWRCB. Wetland habitat is not present within the project area.

Implementation of the proposed project has the potential to result in permanent and temporary impacts to these potentially jurisdictional features through the installation of proposed project components as well as disturbance associated with construction activities. Direct impacts would include construction activities and placement of project components within the drainage features and indirect impacts could include erosion, sedimentation, and accidental release of hazardous construction materials during construction activities. Operation of the spray field also has the potential to result in indirect impacts to these drainage features resulting from site disturbance and the discharge of water. However, the nearest drainage feature is located approximately 400 feet from the proposed spray field (as mitigated; see Figure 4.4-5). This distance and the proposed berms surrounding the spray field would ensure treated wastewater would not enter jurisdictional features and habitat associated with the drainage would not be directly or indirectly affected.

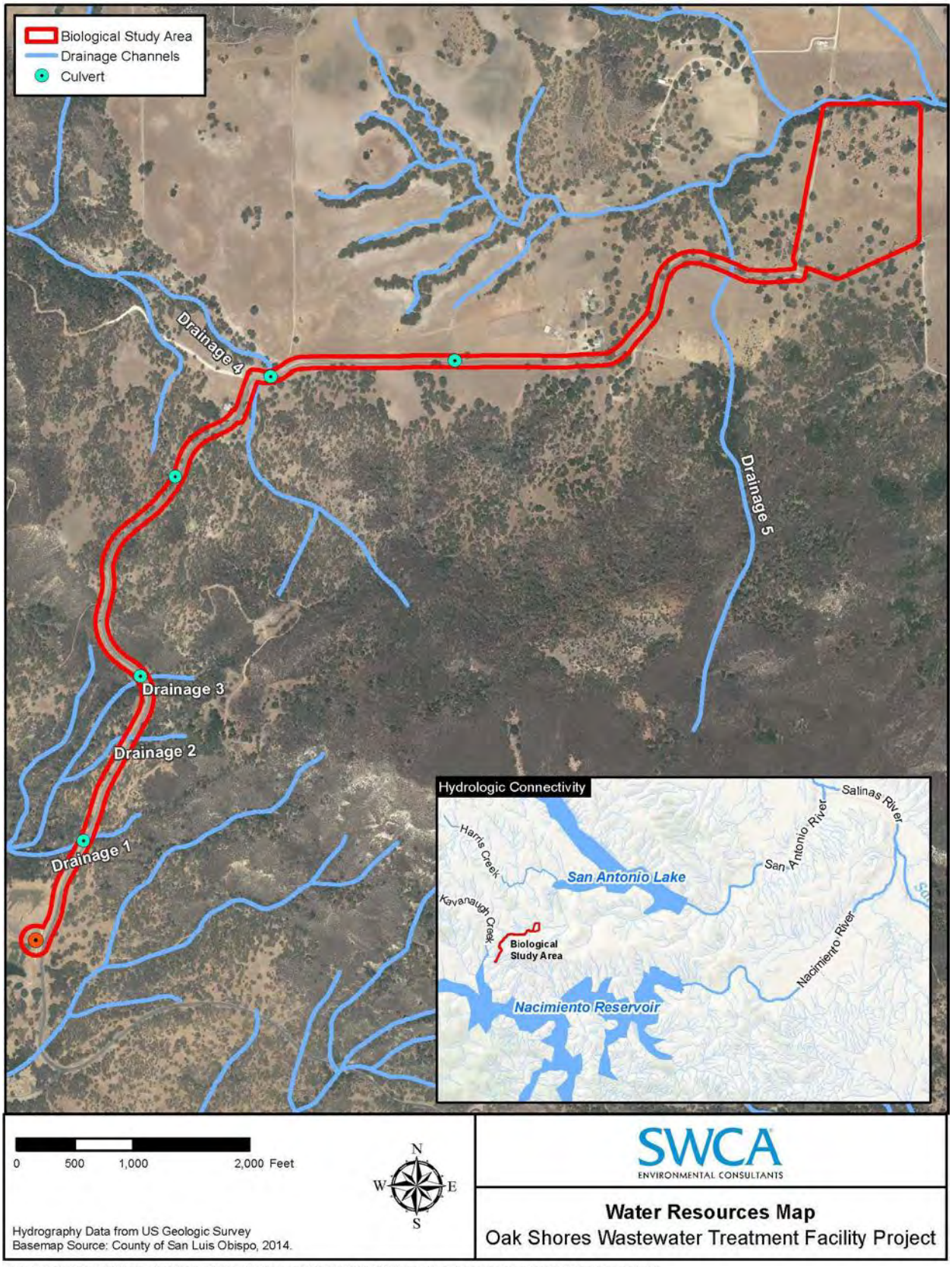


Figure 4.4-5. Water resources map.

Estimated permanent and temporary impact acreages to each of these features are identified in Table 4.4-2 below.

Table 4.4-2. Estimated Impacts to Potentially Jurisdictional Features within the Project Area

Potentially Jurisdictional Feature	Total Area in the Project Area	Impacts*	
		Temporary	Permanent
Drainage 1	0.02 ac (803.25 sf)	0.02 ac (756.57 sf)	0.00 ac (46.59 sf)
Drainage 2	0.01 ac (546.68 sf)	0.01 ac (512.71 sf)	0.00 ac (34.01 sf)
Drainage 3	0.01 ac (507.47 sf)	0.01 ac (477.47 sf)	0.00 ac (30.11 sf)
Drainage 4	0.01 ac (652.09 sf)	0.01 ac (621.87 sf)	0.00 ac (30.30 sf)
Drainage 5	0.01 ac (506.43 sf)	0.01 ac (475.58 sf)	0.00 ac (30.85 sf)
TOTAL	**0.07 ac (3,016.07 sf)**	**0.07 ac (2,844.21 sf)**	**0.00 ac (171.86 sf)**

Note: ac = acre; sf = square feet

*Impact acreages are estimated to capture worst-case scenario impacts associated with the project; actual project impacts may vary.

BIO Impact 2	
Implementation of the proposed project could have a substantial adverse effect on riparian habitat, jurisdictional features, or other sensitive natural community identified in local or regional plans, policies, or regulations or by the CDFW or USFWS *(Class II, less than significant with mitigation).*	
Mitigation Measures	
BIO/mm-2.1	*The limits of grading shall be shown on final improvement/construction plans prior to site disturbance. All new construction, site disturbance, and vegetation removal shall be located within the delineated construction boundaries. The storage of equipment and materials, and temporary stockpiling of soil shall be located within designated areas only, and outside of oak woodland habitat and drainages. Construction/improvement plans shall include grading and drainage, as well as erosion and sedimentation control plans.*
BIO/mm-2.2	*Prior to and during any site preparation and/or construction activities associated with the proposed project, the County shall ensure compliance with the following measures to avoid and/or minimize project impacts to potentially jurisdictional waters:* *a. Prior to disturbance within jurisdictional areas, the County shall obtain a Section 404 Permit from the USACE, a Section 401 Water Quality Certification from the RWQCB, and a Section 1602 Streambed Alteration Agreement from the CDFW for project-related impacts that will occur in areas under the jurisdiction of these regulatory agencies.* *b. Prior to initiation of any site preparation and/or construction activities, a Storm Water Pollution Prevention Plan for the project will be prepared. Provisions of this plan shall be implemented during and after construction, as necessary, to avoid and minimize erosion and stormwater pollution in and near the work area.* *c. Prior to any ground-disturbing activities, the County shall ensure jurisdictional waters are delineated with flagging or exclusionary fencing and construction activities will minimize impacts to jurisdictional waters. Since impacts to jurisdictional waters are anticipated to be temporary, these areas will be restored at a 1:1 ratio to approximate their pre-construction condition.* *d. During construction, erosion control measures shall be implemented. Silt fencing, fiber rolls, and barriers shall be installed as needed between the project site and jurisdictional waters to be avoided. At a minimum, erosion controls shall be maintained*

BIO Impact 2	
	by the contractor on a daily basis throughout the construction period. *e. During construction, the cleaning and refueling of equipment and vehicles shall occur only within designated staging areas and at least 100 feet from jurisdictional waters.* *f. Stream contours shall be restored as close as possible to their original condition.*
BIO/mm-2.3	*Prior to initiation of any site preparation and/or construction activities, the County shall ensure all known communities of purple needlegrass grassland located within the project site are delineated with flagging or exclusionary fencing to identify these areas as environmentally sensitive areas (ESAs). If possible, construction activities will avoid all ground disturbing activities within the delineated ESAs to avoid any impacts to this community. If construction activities cannot be avoided within these ESAs, areas with purple needlegrass temporarily impacted as a result of construction will be replanted/restored with purple needlegrass at a 1:1 ratio (anticipated to be 0.2-acre total). To guarantee the success of the purple needlegrass restoration, the County will monitor until replanted purple needlegrass is successfully established (i.e., has been restored to existing conditions). Additional monitoring will be necessary if initially-required vegetation is not considered successfully established.*
BIO/mm-2.4	*In addition to implementation of mitigation measure AES/mm-1.1, prior to, during, and following implementation of construction activities, the County shall implement the following measures to avoid and/or minimize project impacts to oak trees:* *a. Prior to issuance of permits, the applicant shall redesign the footprint of the permanent project components, including the spray fields, storage and sludge ponds, and pipelines to retain existing mature oaks and vegetation to the maximum extent feasible (see Figure 4.4-6).* *b. The redesigned disposal site shall be shown on all improvement/construction plans and shall be submitted to the County of San Luis Obispo Department of Planning and Building for approval prior to construction.* *c. Upon development of final construction plans and prior to site disturbance, construction plans will clearly delineate all trees within 50 feet of the proposed project limits, and will show which trees are to be removed or impacted, and which trees are to remain unharmed. Tree removal shall only be allowed immediately prior to the construction of proposed project components. Trees to remain, either permanently or temporarily during the construction of proposed upgrades, shall be protected to prevent unnecessary tree removal.* *d. Upon development of final construction plans and prior to site disturbance, the County will organize all mitigation measures applicable to oak trees and oak woodland habitat requirements into a single Oak Tree Mitigation Plan to ensure coordination of all oak tree related measures. A copy of this plan will be included in the project's special provisions. In addition to other adopted mitigation measures, this plan will incorporate the following measures:* *i. All oak trees identified to remain, either permanently or temporarily during improvements, will not be removed. Removal activities will be conducted in a manner to minimize effects to surrounding oak woodland to remain.* *ii. Removed trees will be replaced in-kind at a 4:1 ratio and trees impacted but not removed will be mitigated in-kind at a 2:1 ratio. Replanting will be completed as soon as it is feasible (e.g. irrigation water is available and grading activities are complete in proposed replanting areas). Replant areas will be located either in native topsoil or areas where native topsoil has been reapplied. If located in areas where native topsoil has been reapplied, topsoil will be carefully removed and stockpiled for spreading over graded areas to be replanted. The layer of reapplied topsoil shall be a minimum of 6 to 12 inches deep.* *iii. Seed stock will be collected on-site or in the immediately surrounding area.* *iv. Location of newly planted trees and/or vegetation/seeds should adhere to the*

BIO Impact 2

following, whenever possible: on the north side of and at the canopy/dripline edge of existing mature native trees; on north-facing slopes; within drainage swales (except when riparian habitat present); where topsoil is present; and away from continuously wet areas (e.g. lawns, leach lines).

v. Newly planted trees will be maintained until successfully established. This will include protection (e.g. tree shelters, exclusionary fencing) from animals (e.g., deer, rodents), regular weeding (minimum of once during early Fall and once during early Spring) of at least a 3-foot radius surrounding the tree/plant and adequate watering (e.g., drip-irrigation system). Watering should be controlled so only enough is used to initially establish the tree/plant, gradually reducing to zero water over a 3-year period. If possible, planting during the warmest, driest months (June through September) will be avoided. In addition, standard planting procedures (e.g., planting tablets, initial deep watering) will be used.

vi. Following planting of replacement oak trees, to guarantee the success of the new trees, the County will monitor the new trees' survivability and vigor until the trees are successfully established and prepare monitoring reports on an annual basis for a minimum of 7 years. The first monitoring report shall be submitted to the County Environmental Coordinator 1 year after the completion of replacement planting and thereafter on an annual basis until the monitor, in consultation with the County, has determined that the initially-required vegetation is successfully established. Additional monitoring will be necessary if initially-required vegetation is not considered successfully established. Success criteria for revegetation is 80% survivability within 5 years upon initial planting efforts.

vii. The County will maintain compliance with the following measures related to weed removal around newly planted vegetation: 1) no herbicides will be used; and 2) either installation of a securely staked "weed mat" (covering at least a 3-foot radius from center of plant), or hand-removal of weeds (covering at least a three-foot radius from center of plant) will be completed for each new plant (hand-removal weeding will be maintained on a regular basis [at least once in late spring (April) and once in early winter (December)] until plant is 3 feet tall or for 7 years, whichever occurs first. Use of weed-free mulch (at least 3 inches deep) with regular replenishment may be substituted for the weed mat.

e. Prior to initiation of construction activities, all trees to remain onsite that are within 50 feet of construction or grading activities will be marked for protection (e.g., with flagging) and their root zone fenced. The outer edge of the tree root zone is 1.5 times the distance from the trunk to the drip line of the tree. Grading, utility trenching, compaction of soil, or placement of fill will be avoided within these fenced areas. If grading in the root zone cannot be avoided, retaining walls may be constructed to minimize cut and fill impacts. Care will be taken to avoid surface roots within the top 18 inches of soil. If any roots must be removed or exposed, they will be cleanly cut and not left exposed above the ground surface.

f. Prior to initiation of construction activities, the County will ensure that a qualified biologist verify that oak tree protection measures and purple needlegrass grassland protection measures (as described in BIO/mm-2.4) are correctly implemented.

g. All oak trees identified to remain will not be removed. Unless previously approved by the County, the following activities are not allowed within the root zone of existing or newly planted oak trees: year-round irrigation (no summer watering, unless "establishing" new tree or native compatible plant(s) for up to 3 years); grading (includes cutting and filling of material); compaction (e.g., regular use of vehicles); placement of impermeable surfaces (e.g., pavement); disturbance of soil that impacts roots (e.g., tilling).

h. If trimming is necessary, the County will retain a County-approved, certified arborist, or apply accepted arborist's techniques, when removing limbs. Unless a hazardous or unsafe situation exists, trimming will be done only during the winter for deciduous

BIO Impact 2
species. Smaller trees (smaller than 5 inches in diameter at 4 feet above the ground) within the project area are considered to be of high importance and, when possible, will be given similar consideration as larger trees.
Residual Impacts
Residual impacts would be less than significant.

4.4.6.3 Interfere 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

As discussed previously, according to the existing California Essential Habitat Connectivity Project data, the project site is located within an ECA that provides connectivity between the Salinas Natural Landscape Blocks. ECAs are only intended to be a broad scale representation of areas that provide essential connectivity. It is expected that additional linkages will be identified as new data becomes available for various species.

For the purposes of this analysis, it is reasonable to assume that the undeveloped portions of the project site may allow movement by wildlife, such as migratory birds, on a smaller scale. The project site does not support aquatic habitat suitable for the presence of resident of migratory fish species. The proposed project is not expected to have significant impacts on the movement of resident or migratory fish or wildlife species.

Implementation of Measures BIO/mm-1.1 through BIO/mm-1.6 would be sufficient to avoid and/or minimize potential project impacts to the movement of wildlife within the project site.

BIO Impact 3
Implementation of the proposed project could 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 *(Class II, less than significant with mitigation)*.
Mitigation Measures
Implement mitigation measures BIO/mm-1.1 through BIO/mm-1.6.
Residual Impacts
Residual impacts would be less than significant.

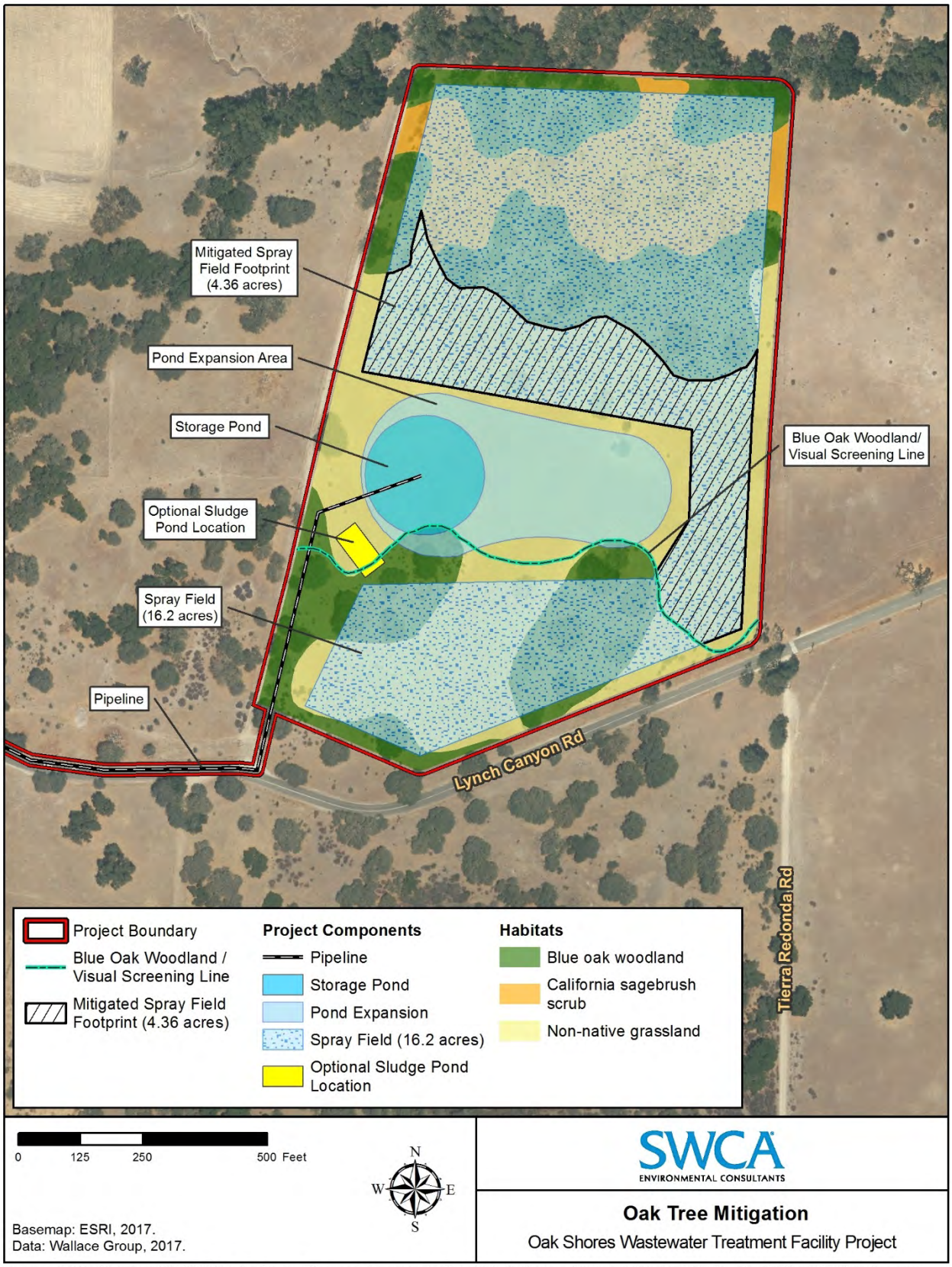


Figure 4.4-6. Oak tree mitigation map.

4.4.6.4 Conflict with Local Policies or Ordinances Protecting Biological Resources

Implementation of the proposed project has the potential to conflict with local policies in the COSE of the County's General Plan that are intended to protect native habitat, sensitive species, woodlands, and riparian habitat. Implementation of mitigation measures BIO/mm-1.1 through BIO/mm-2.4 would reduce the potential for the project to conflict with local policies and ordinances.

BIO Impact 4
Implementation of the proposed project could conflict with local policies or ordinances protecting biological resources *(Class II, less than significant with mitigation)*.
Mitigation Measures
Implement mitigation measures BIO/mm-1.1 through BIO/mm-2.4.
Residual Impacts
Residual impacts would be less than significant.

4.4.6.5 Conflict with the Provisions of an Adopted Habitat Conservation Plan, Natural Community Conservation Plan, or Other Approved Local, Regional, or State Habitat Conservation Plan

The project site is not located within an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other habitat conservation plan. Therefore, no impacts would occur.

4.4.7 Cumulative Impacts

Implementation of the proposed project has the potential to result in adverse impacts to special-status animals, sensitive natural communities, including purple needlegrass grassland and blue oak woodland, and potentially jurisdictional intermittent drainages. The proposed project could contribute to cumulative impacts to these resources when combined with impacts associated with other planned and proposed projects in the County. As discussed above, mitigation measures have been included to avoid and/or reduce potential adverse impacts to biological resources associated with the proposed project. Therefore, implementation of mitigation measures BIO/mm-1.1 through BIO/mm-2.4 would reduce the project's potential cumulative impacts to be less than significant.

BIO Impact 5
Implementation of the proposed project could contribute to cumulative impacts to biological resources *(Class II, less than significant with mitigation)*.
Mitigation Measures
Implement mitigation measures BIO/mm-1.1 through BIO/mm-2.4.
Residual Impacts
Residual impacts would be less than significant.

4.5 CULTURAL RESOURCES

This section analyzes potential impacts to cultural resources that would be caused by implementation of the proposed project. This includes impacts to prehistoric archaeological sites, historic-era structures and buildings, and the potential for newly discovered archaeological resources, which could potentially be impacted by construction of the WWTF upgrades. Information sources used in preparation of this section include literature and data review from various public records, background research and a pedestrian survey conducted by SWCA (2017), an Extended Phase 1 study conducted by Albion Environmental Inc. (2016), and a field visit conducted by SWCA staff on August 10, 2017. Due to the sensitive nature of archaeological resources, which can be damaged or destroyed through uncontrolled public disclosure of information, specific resource locations are not disclosed in the SEIR. The SWCA and Albion cultural resource reports, however, are on file with the County Public Works Department and are available for review by qualified persons.

4.5.1 Existing Conditions

4.5.1.1 Regional Pre-History

California prehistory is divided into three broad temporal periods that reflect similar cultural characteristics throughout the state: Paleoindian Period (circa [ca.] 9000–6000 B.C.), Archaic Period (6000 B.C.–A.D. 500), and Emergent Period (A.D. 500–Historic Contact) (SWCA 2017). The Archaic is further divided into Lower (6000–3000 B.C.), Middle (3000–1000 B.C.), and Upper (1000 B.C.–A.D. 500) Periods. These divisions are generally governed by climatic and environmental variables, such as the drying of pluvial lakes at the transition from the Paleoindian to the Lower Archaic period.

4.5.1.2 Paleontological Sensitivity

Using information from the USGS National Geological Map Database and the Nacimiento Water Project Final EIR, underlying geologic formations of the project site were identified and evaluated for paleontological sensitivity (Table 4.5-1). Paleontological sensitivity is assigned based on fossil data collected from the geologic unit. Paleontological sensitivity ratings are described as follows (Panorama Environmental, Inc. 2017):

- **High Sensitivity.** Indicates fossils are currently observed on site, localities are recorded within the study area, and/or the unit has a history of producing numerous significant fossil remains.
- **Moderate Sensitivity.** Fossils within the unit are generally not unique, or are so poorly preserved as to have only moderate scientific significance.
- **Low Sensitivity.** Indicates significant fossils are not likely to be found because of a random fossil distribution pattern, extreme youth of rock unit, and/or the method of rock formation, such as alteration by heat and pressure.
- **Zero Sensitivity.** Origin of the geologic unit renders it not conductive to the existence of organisms and/or preservation of fossils, such as high-grade metamorphic rocks, intrusive igneous rocks, most volcanic rocks, and artificial fill materials.

Table 4.5-1. Paleontological Sensitivity of Geologic Formations for the Project Area

Geologic Formation[1]	Project Component(s) located Within the Formation	Sensitivity of formation[2]
Surficial Sediments – Alluvial sand and gravel, young[3]	Gregg Ranch Disposal Site	Low
Vaqueros Formation	Lift station and force main pipeline	Low
Red Beds – Berry Formation, Oligocene	Lift station, force main pipeline, and existing WWTF	Low

[1] Source: Diblee Geological Foundation. 2006. Geologic Map of the Tierra Redonda Mountain Quadrangle. [2] Source: San Luis Obispo County. 2003. Nacimiento Water Project Environmental Impact Report.

[3] The alluvial sediments were classified as young as they were deposited during the Holocene epoch, and old alluvial deposits are typically deposited late in the Pleistocene epoch.

4.5.1.3 Ethnographic Overview

The project area was historically occupied by the Salinan, with the northernmost subdivision of the Chumash, the Obispeño (after Mission San Luis Obispo de Tolosa), bordering to the south (Albion Environmental, Inc. 2016). However, the precise location of the boundary between the Chumashan-speaking Obispeño Chumash and their northern neighbors, the Hokan-speaking Playanos Salinan, is currently the subject of debate (SWCA 2017). Jones and Waugh state that "those boundaries may well have fluctuated through time in response to possible shifts in economic strategies and population movement" (SWCA 2017).

4.5.1.4 Site-Specific Archaeological Setting

The original project site for the proposed Oak Shores WWTF storage ponds and spray fields were located on the portions of Gregg Ranch both north and south of Lynch Canyon Road. SWCA conducted a field survey on the original project site and identified a previously undocumented cultural resource site (CA-SLO-2820/H). Based on the results of SWCA's pedestrian survey, the County required an Extended Phase I study to determine the extent of the cultural resource site, and to determine if impacts to the resource would result from the project. Artifacts were found both above and below the surface within the study area during the Extended Phase I study. Based on the results of the initial and subsequent field surveys, the County relocated the project footprint. The proposed project described in this SEIR is the relocated facility, which, based on the surface and subsurface exploration conducted, avoids the known cultural resources.

4.5.1.5 Historic Setting: Lynch Ranch

Survey work identified features associated with the 160-acre historic Lynch Ranch (including a remnant orchard and vineyard) within the boundaries of the Gregg Ranch component of the project. Although the historic extent of the ranch (see Figure 4.5-1) overlaps with proposed project area, no extant features are present within or adjacent to proposed disturbance areas.

Figure 4.5-1. Government survey of Township 25 South, Range 9 East, MDM, mapped in 1869. The dotted outline of the 160-acre Lynch ranch is shown. Note also the location of one of Lynch's sheep camps, in the SE ¼ of Section 11.

The ranch property now identified as 2685 Lynch Canyon Road (Assessor's Parcel Number [APN] 913-002-110) is historically associated with the family of James Lynch (1826–1909) and Alice Mary Kennedy Lynch (1833–1911), who lived there for 50 years—from 1860 until her death in 1911. James was born May 2, 1826, in Pennsylvania and came to California in 1847 as part of the volunteer forces recruited by Colonel Stevenson in New York in 1846 to serve in California during the Mexican-American War. As part of Captain Lippitt's Company F of the U.S. Army First Regiment of New York Volunteers, Lynch first became acquainted with San Luis Obispo County. He remained in California after the end of the war, spent some time mining for gold, and later became a businessman in Stockton before relocating to San Francisco in July 1853 to work in the Customs House. By 1856, he and his brother-in-law were operating a wood and coal yard in San Francisco (Lynch 1935).

Alice Mary Kennedy was born January 17, 1833, in County Meath, Ireland. She and her older sister were educated in a convent school (where they learned French and fine needlework). Both sisters and their brother emigrated to New York City in 1849, where the young women found work as embroiderers. Alice and other family members voyaged to San Francisco, via Cape Horn, arriving in April 1853. Alice was hired to teach at the North Beach School. She and James Lynch were married in San Francisco on November 27, 1856 and went on to have a family of six children (Figure 4.5-2).

Figure 4.5-2. Alice and James Lynch, with their eldest child, James K. Lynch, 1858.

According to his wife's diary, in January 1859, James Lynch (who had been raised in the country and apprenticed as a carpenter) decided to sell his interest in James Lynch & Company to her brother, and sell their San Francisco house, as well (Lynch 1857–1865). Disillusioned with city life, James began traveling farther south, seeking a place to relocate his family and start a sheep ranch. He chose the Tierra Redonda area in northern San Luis Obispo County. Lynch's daughter, Alice Clare Lynch, wrote in her 1935 memoir:

> *"He saw where he would build his house, close to the mountain which was to be a shelter from the storms of winter, but facing a beautiful vista of wooded valley with range after range of hills to the north. A number of low hills which formed part of the boundary of the valley were rounded in shape, and on account of these the Spanish residents of the country had given the name Tierra Redonda or literally "round land" to the valley and to the mountain, which rose abruptly above the surrounding territory, 2051 feet above sea level, and was visible for many miles."*

Alice Clare Lynch also noted that, as a child, she "listened with great interest to tales of the Indian Rancheria which once occupied the spot where Father built his house. . . ." At the time of James Lynch's arrival in the Tierra Redonda Valley, his chosen homesite was already occupied by William Smith, who had begun a log cabin; Lynch reportedly bought out Smith's claim for $200. Not far away were the charred ruins of another cabin and the grave of its former owner, a reclusive physician, Henry J. Freund, who had been murdered there (Lynch 1935). No other settlers were within several miles.

Alice traveled to the ranch for the first time in late September, arriving on October 2, 1859; the young family moved into their ranch home in June 1860. Alice's diary concludes on New Year's Day 1865, but four volumes of ranch account books (with entries for household and personal expenses) continued to cover the 35-year span between 1874 and 1910, the year after James Lynch's death (Lynch and Lynch 1874–1910). These remarkable documentary records of ranch activities at Tierra Redonda—including descriptions of events from a pioneer woman's perspective—were extended beyond their lifetimes by subsequent generations. These later accounts include the memoirs of their son, James Kennedy Lynch (dictated to his own grandson in 1996); the memoirs of their daughter Alice Clare Lynch (1869–1948), and the memoirs of Nora M. Lynch, Alice and James's great-grand-daughter, of her time at Tierra Redonda in the 1930s.

Although additional acreage was acquired over the years, the Lynch family's Tierra Redonda ranch originally embraced 160 acres in Township 25 South, Range 9 East, Mount Diablo Meridian, with more

than a dozen sheep camps established at various locations in the surrounding government lands. The home ranch (the subject parcel) was in the 40-acre SW ¼ of the SW ¼ of Section 2, which also included an abundant spring (see Figure 4.5-1). James Lynch received the patent to his 160 acres in February 1871.

As indicated in his daughter's 1935 memoir, James Lynch began building a larger house for the family in 1864, later adding a barn and various other structures needed for the sheep ranch operations. Combined with the 1869 government survey map and photographs, the abundant first-hand accounts of the Tierra Redonda ranch provide exceptional, detailed documentation for understanding not only the present built-environment (including fence lines, a remnant orchard and vineyard, non-native shade trees, and other introduced vegetation such as Opuntia and Ailanthus) but also provide context for identified archaeological resources the area.

4.5.2 Regulatory Setting

This regulatory framework section identifies the federal, state, and local laws, statutes, guidelines, and regulations that govern the identification and treatment of cultural resources as well as the analysis of potential impacts to cultural (archaeological) resources.

4.5.2.1 Federal Policies and Regulations

Section 106 of the NHPA (16 United States Code 470f) requires federal agencies to take into account the effects of their undertakings on any district, site, building, structure, or object that is included in or eligible for inclusion in the National Register of Historic Places (NRHP) and to afford the Advisory Council on Historic Preservation (ACHP) a reasonable opportunity to comment on such undertakings (36 CFR 800.1). Under Section 106, the significance of any adversely affected cultural resource is assessed and mitigation measures are proposed to reduce any impacts to an acceptable level. Significant cultural resources are those resources that are listed on, or are eligible for listing on the NRHP per the criteria listed at 36 CFR 60.4 (ACHP 2015) below.

The quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling and association and that:

(a) Are associated with events that have made a significant contribution to the broad patterns of our history; or

(b) Are associated with the lives of persons significant in our past; or

(c) Embody the distinctive characteristics of a type, period, or method of installation, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or

(d) Have yielded, or may be likely to yield, information important in prehistory or history.

Cultural resources are considered during federal undertakings chiefly under Section 106 of the National Historic Preservation Act of 1966 (NHPA; as amended) through one of its implementing regulations, 36 CFR 800 (Protection of Historic Properties), as well as the National Environmental Policy Act (NEPA). Properties of traditional religious and cultural importance to Native Americans are considered under Section 101(d)(6)(A) of NHPA. Other pertinent federal laws include the Archaeological Data Preservation Act of 1974, the American Indian Religious Freedom Act (AIRFA) of 1978, the Archaeological Resources Protection Act (ARPA) of 1979, and the Native American Graves Protection and Repatriation Act (NAGPRA) of 1990, among others.

4.5.2.2 State Policies and Regulations

CEQA (PRC Section 21000 et seq.) requires consideration of a project's impacts on significant historical and archaeological resources. Significant impacts on such resources are to be avoided or mitigated to less than significant levels.

The State of California has formulated laws for the protection and preservation of historic and archaeological resources. Generally, a Cultural resource shall be considered to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (CRHR) (PRC Section 5024.1, 14 CCR 4852) including the following:

- Is associated with events that have made a significant contribution to the broad patterns of California's history and Cultural heritage;
- Is associated with the lives of persons important in our past;
- Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
- Has yielded, or may be likely to yield, information important in prehistory or history.

The fact that a resource is not listed in, or determined to be eligible for listing in the CRHR, not included in a local register of historical resources (pursuant to PRC Section 5020.1(k)), or identified in an historical resources survey (meeting the criteria in PRC Section 5024.1(g)) does not preclude a lead agency from determining that the resource may be an historical resource as defined in PRC Sections 5020.1(j) or 5024.1.

If the project may cause damage to a significant archaeological resource, the project may have a significant effect on the environment. Section 15064.5 of CEQA pertains to the determination of the significance of impacts to archaeological and historic resources, and provides guidelines for administering to archaeological resources that may be adversely affected by project development in Section 151226.4. Achieving CEQA compliance with regard to treatment of impacts to significant Cultural resources requires that a mitigation plan be developed for the resource(s). Preservation in place is the preferred manner of mitigating impacts to archaeological resources.

4.5.2.2.1 ASSEMBLY BILL 52

AB 52 formalizes the lead agency–tribal consultation process, requiring the lead agency to initiate consultation with California Native American groups that are traditionally and culturally affiliated with the project, including tribes that may not be federally recognized. As the lead agency, the County is required to begin consultation prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report.

Section 4 of AB 52 adds PRC Sections 21074(a) and (b), which address tribal cultural resources and cultural landscapes. Section 21074(a) defines tribal cultural resources as one of the following:

> *(1) Sites, features, places, 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.*
>
> *(B) Included in a local register of historical resources as defined in subdivision (k) of 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 Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.*

Section 1 (a)(9) of AB 52 establishes that "a substantial adverse change to a tribal cultural resource has a significant effect on the environment." Effects on tribal cultural resources should be considered under CEQA. Section 6 of AB 52 adds Section 21080.3.2 the PRC, which states that parties may propose mitigation measures "capable of avoiding or substantially lessening potential significant impacts to a tribal cultural resource or alternatives that would avoid significant impacts to a tribal cultural resource." Further, if a California Native American tribe requests consultation regarding project alternatives, mitigation measures, or significant effects to tribal cultural resources, the consultation shall include those topics (PRC Section 21080.3.2[a]). The environmental document and the mitigation monitoring and reporting program (where applicable) shall include any mitigation measures that are adopted (PRC Section 21082.3 [a]).

4.5.2.3 Local Policies and Regulations

The County has a vital interest in preserving its many older buildings, and prehistoric and historic sites, which not only represent the heritage of San Luis Obispo County, but also help define the character of the region today. The County of San Luis Obispo LUO (Title 22) dictates the following regarding archaeological resources:

In the event archaeological resources are unearthed or discovered during any construction activities, the following standards apply:

- Construction activities shall cease, and the County Environmental Coordinator shall be notified so that the extent and location of discovered materials may be recorded by a qualified archaeologist, and disposition of artifacts may be accomplished in accordance with state and federal law.
- In the event archaeological resources are found to include human remains, or in any other case when human remains are discovered during construction, the County Coroner is to be notified in addition to the Environmental Coordinator so proper disposition may be accomplished. If the remains are determined to be Native American, then the County Coroner must notify the Native American Heritage Commission within 24 hours.

4.5.3 Thresholds of Significance

CEQA directs lead agencies to protect and preserve resources with Cultural, historic, scientific, or educational value. In accordance with Section 15064.5 (Determining the Significance of Impacts to Archaeological and Historic Resources) and Appendix G of the State CEQA Guidelines, the County identified the following questions to determine a project's impact on cultural resources.

Would the project:

a. Disturb archaeological resources;

b. Disturb historical resources;

c. Disturb paleontological resources; or

d. Cause a substantial adverse change to a Tribal Cultural Resource?

4.5.4 Impact Assessment and Methodology

CEQA applies to historic and archaeological sites. When a project will impact an archaeological site, the lead agency must first determine whether the site is an historical resource. A substantial adverse change in the significance of a historical resource would occur if the project results in the physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of the historical resources would be materially impaired. The significance of an historical resource is materially impaired when a project:

- Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the CRHR; or
- Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to PRC §5020.1(k) or its identification in an historical resources survey meeting the requirements of PRC §5024.1(g), unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or Culturally significant; or
- Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the CRHR as determined by a lead agency for the purposes of CEQA.

4.5.5 Native American Consultation

SWCA contacted the California Native American Heritage Commission (NAHC) by letter requesting a review of the Sacred Lands File. The NAHC responded indicating that the search of the Sacred Lands File did not indicate the presence of Native American cultural resources in the project area or a 0.5-mile radius. The NAHC provided a list of nine Native American contacts that may have additional information about the project area.

The County Public Works Department maintains their own list of 10 Native American contacts developed during the initial implementation of AB 52. Each Native American representative was contacted regarding this project. The County received correspondence from four representatives, with two requesting additional project updates, when available. Copies of the two cultural resources surveys were provided to both respondents requesting additional information.

4.5.6 Project-Specific Impacts and Mitigation Measures

Project-specific impacts include direct and indirect impacts. Direct impacts result from land modification directly and immediately caused by the construction, landscaping, operation, or maintenance of a facility. Indirect impacts also occur as a result of a specific project, but do not result from intentional ground disturbance. Common indirect impacts include erosion, vibration, unauthorized artifact collecting, and vandalism. As currently planned, the proposed project entails ground disturbance construction activities during the construction phase. The remainder of this section discusses the potential impacts to cultural resources from the construction and operation of the proposed project.

4.5.6.1 Archaeological Resources

No archaeological resources have been identified within the project area's disturbance footprint and no impacts to known resources will occur as a result of project implementation. As previously discussed, the project area has been relocated to avoid any potential impacts to known archaeological sites. However,

there is the potential for the existence of buried archaeological materials within a project area. The inadvertent disturbance of unknown archaeological resources would be a *potentially significant* impact. The following mitigation measures are provided to avoid and/or reduce impacts to unknown archaeological resources.

CR Impact 1	
Implementation of the proposed project may result in the displacement and destruction of unknown, subsurface, archaeological resources *(Class II, less than significant with mitigation)*.	
Mitigation Measures	
CR/mm-1.1	*Prior to construction activities, the applicant shall have a County-qualified archaeologist conduct a cultural resource awareness training for all construction personnel including the following:* *a. Review the types of archaeological artifacts that may be uncovered;* *b. Provide examples of common archaeological artifacts to examine;* *c. Review what makes an archaeological resource significant to archaeologists and local native Americans;* *d. Describe procedures for notifying involved or interested parties in case of a new discovery;* *e. Describe reporting requirements and responsibilities of construction personnel;* *f. Review procedures that shall be used to record, evaluate, and mitigate new discoveries; and* *g. Describe procedures that would be followed in the case of discovery of disturbed as well as intact human burials and burial-associated artifacts.*
CR/mm-1.2	*Prior to project implementation, the Applicant shall prepare an Archaeological Monitoring Plan (AMP). The AMP shall include (but not be limited to) the following:* *a. A list of personnel involved in the monitoring activities;* *b. Description of Native American involvement;* *c. Description of how the monitoring shall occur;* *d. Description of frequency of monitoring (e.g., full time, part time, spot checking);* *e. Description of what resources are expected to be encountered;* *f. Description of circumstances that would result in the halting of work at the project site;* *g. Description of procedures for halting work on the site and notification procedures;* *h. Description of monitoring reporting procedures; and,* *i. Provide specific, detailed protocols for what to do in the event of the discovery of human remains.*
CR/mm-1.3	*An archaeological and Native American monitor shall be present during project related ground disturbing activities that have the potential to encounter previously unidentified archaeological resources, as outlined in the AMP prepared to satisfy CR/mm-1.2. Archaeological monitoring may cease at any time if the County-qualified archaeologist, in coordination with project's Environmental Coordinator, determine that project activities do not have the potential to encounter and/or disturb unknown resources.*

CR Impact 1	
CR/mm-1.4	*In the event that unknown archaeological resources are inadvertently encountered during the project, all ground disturbing activities shall cease, and the County Environmental Coordinator shall be notified so that the extent and location of discovered materials may be recorded by a qualified archaeologist, and disposition of artifacts may be accomplished in accordance with state and federal law.*
Residual Impacts	
Residual impacts would be less than significant.	

4.5.6.1.1 HUMAN REMAINS

The discovery of human remains is a possibility during construction activities. California Health and Safety Code Section 7050.5 addresses this issue and states that, in the event of inadvertent discovery of human remains, no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98. The County Coroner shall be notified of the find immediately. If the human remains are determined to be prehistoric, the coroner will notify the Native American Heritage Commission, which will determine and notify a most likely descendant (MLD). The MLD shall complete the inspection of the site within 48 hours of notification, and may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials. The inadvertent disturbance of human remains during earth disturbing or grading activities would be a *potentially significant* impact.

CR Impact 2	
Implementation of the proposed project may result in the disturbance or destruction of unknown, subsurface human remains (*Class II, less than significant with mitigation*).	
Mitigation Measures	
CR/mm-2.1	*If human remains are exposed during construction, the Applicant shall notify the County Environmental Coordinator immediately and comply with State Health and Safety Code Section 7050.5, which states that no further disturbance shall occur until the County Coroner has been notified and can make the necessary findings as to origin and disposition of the remains pursuant to PRC Section 5097.98. Construction shall halt in the area of the discovery of human remains, the area shall be protected, and consultation and treatment shall occur as prescribed by law.*
Residual Impacts	
Residual impacts would be less than significant.	

4.5.6.2 Historic Resources

A significant impact to historical resources could occur if there was potential for the proposed project to involve the physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired. No historic resources or structures are located within the project site; therefore, no impact would occur. As previously discussed, all extant resources related to the historic Lynch Ranch have been avoided due to relocation of

the project area. As such, no mitigation measures are necessary to reduce or avoid potential impacts on historic resources.

4.5.6.1 Paleontological Resources

Implementation of the project would require substantial grading, primarily within previously undisturbed areas. Due to the low sensitivity of the underlying geologic formations, there is a low potential for significant paleontological discovery. In addition, proposed trenching and grading depths are unlikely to disturb significant amounts of bedrock, if any, which reduces the possibility of discovery of paleontological resources. However, discovery and disturbance of paleontological resources during grading and construction activities is still a possibility, which could result in a potentially significant impact. Standard inadvertent discovery measures have been identified to reduce this impact to less than significant

CR Impact 3	
Proposed grading and excavation activities have the potential to uncover and disturb previously unknown paleontological resources, which would result in a potentially significant impact (*Class II, less than significant with mitigation*).	
Mitigation Measures	
CR/mm-3.1	*If any paleontological resources are encountered during ground-disturbing activities, activities in the immediate area of the find shall be halted and the discovery assessed. A qualified paleontologist shall be retained to evaluate the discovery and recommend appropriate treatment options pursuant to guidelines developed by the Society of Vertebrate Paleontology. A paleontological resource impact mitigation program for treatment of the resources shall be developed and implemented if paleontological resources are encountered.*
Residual Impacts	
Residual impacts would be less than significant.	

4.5.6.2 Tribal Cultural Resources

No Tribal Cultural Resources were identified within the project area as a result of background research and fieldwork conducted for the project. Archaeological site CA-SLO-2820/H has not yet been determined eligible for listing in the CRHR or identified as Tribal Cultural Resource. Regardless, as the project has been modified to avoid this site, no mitigation specific to Tribal Cultural Resources is warranted at this time. With the implementation of recommended mitigation measures for potential impacts to archaeological resources, any unknown discovered tribal cultural resources or human remains will stop construction and be treated in accordance with federal, state, and county laws. With implementation of identified mitigation measures, potential impacts to tribal cultural resources would be less than significant with mitigation.

CR Impact 4
Proposed grading and excavation activities have the potential to uncover and disturb previously unknown tribal cultural resources, which would result in a potentially significant impact (*Class II, less than significant with mitigation*).
Mitigation Measures
Implement CR/mm-1.1 through CR/mm-2.1.
Residual Impacts
Residual impacts would be less than significant.

4.5.7 Cumulative Impacts

Based on the information above, the proposed project would have less than significant impacts to cultural resources. No historic or prehistoric resources were identified in the project area during records searches or field surveys of the project area. As mitigated, this project would not result in significant impacts individually, and would not make a considerable contribution to potential cumulative impacts to cultural resources. Therefore, cumulative impacts to cultural resources would be less than significant with mitigation.

CR Impact 5
Implementation of the proposed project could contribute to cumulative impacts to cultural resources (*Class II, less than significant with mitigation*).
Mitigation Measures
Implement CR/mm-1.1 through CR/mm-2.1.
Residual Impacts
Residual impacts would be less than significant.

4.6 LAND USE AND PLANNING

This section of the SEIR addresses potential impacts resulting from implementation of the proposed project on existing land uses and future land use planning and compatibility. County Public Works Department projects are exempt from Title 22, the County Inland LUO; however, Title 22 requirements were used in this section as guidance in analysis of potential land use compatibility, evaluation of impacts, and development of mitigation measures.

4.6.1 Existing Conditions

4.6.1.1 Existing Land Uses and Designations

The proposed project is within the Nacimiento Sub Area of the North County Planning Area. The proposed project consists of three main components—the Gregg Ranch disposal site, the lift station and 2.0-mile-long force main pipeline, and the proposed sludge ponds at the existing WWTF or Gregg Ranch. A portion of the project would be located within the Oak Shores VRL, including the existing WWTF, the proposed lift station at the existing spray field and storage pond location, and an approximately 0.1 mile of the force main pipeline route along Oak Shores Drive. The remainder of the project site would be located outside the Oak Shores VRL, including the Gregg Ranch disposal area and portions of the force main pipeline along Oak Shores Drive and Lynch Canyon Road. Land use designations in the proposed project site include Residential Single Family, Commercial Retail, and Agriculture (Figure 4.6-1). Surrounding areas are also within the Open Space and Rural Lands land use designations. Portions of the project site are located within the Geological Study and Sensitive Resource combining designation (see Figure 4.1-1).

4.6.1.1.1 GREGG RANCH DISPOSAL SITE

The proposed Gregg Ranch disposal site is undeveloped with scattered oak trees and more dense mature vegetation adjacent to an existing drainage near its northern boundary. A dirt road on the disposal area's western border connects to Wendy Way, just north of the riparian woodland area, though currently it is not feasible to cross the drainage via vehicle at this location. The Gregg Ranch site is within the Agriculture land use designation and is considered Farmland of Local Potential and Grazing Land by the CDOC FMMP. The site is also under a Williamson Act contract. There are no combining designations that apply to this portion of the project site.

Land uses adjacent to the Gregg Ranch disposal site include Rural Lands to the north and Agriculture to the east, south, and west. Within 0.25 mile of the site, surrounding land use designations also include Recreation to the north and Rural Lands to the west. Existing land uses on surrounding parcels consist primarily of undeveloped grazing and/or open space land and widely scattered rural single-family residences located on parcels west and northwest of the proposed disposal site. There is a small communications facility approximately 0.1 mile north of the proposed spray field and a surface mining operation approximately 0.3 mile east of the proposed spray field, just east of Interlake Road. The 40-acre Ranchos Dos Amantes Ranch and Bed and Breakfast is located approximately 500 feet west of Gregg Ranch. Interlake Drive approximately 0.15 mile east of Gregg Ranch is considered a state scenic highway route. Based on a review available records and aerial photos, approximately six groundwater wells have been drilled and/or are in operation within 0.5 mile of the proposed spray field. These wells may support domestic and/or agricultural uses. The records indicate that groundwater levels, at the time the wells were drilled, ranged from approximately 60 feet to more than 100 feet below the ground surface.

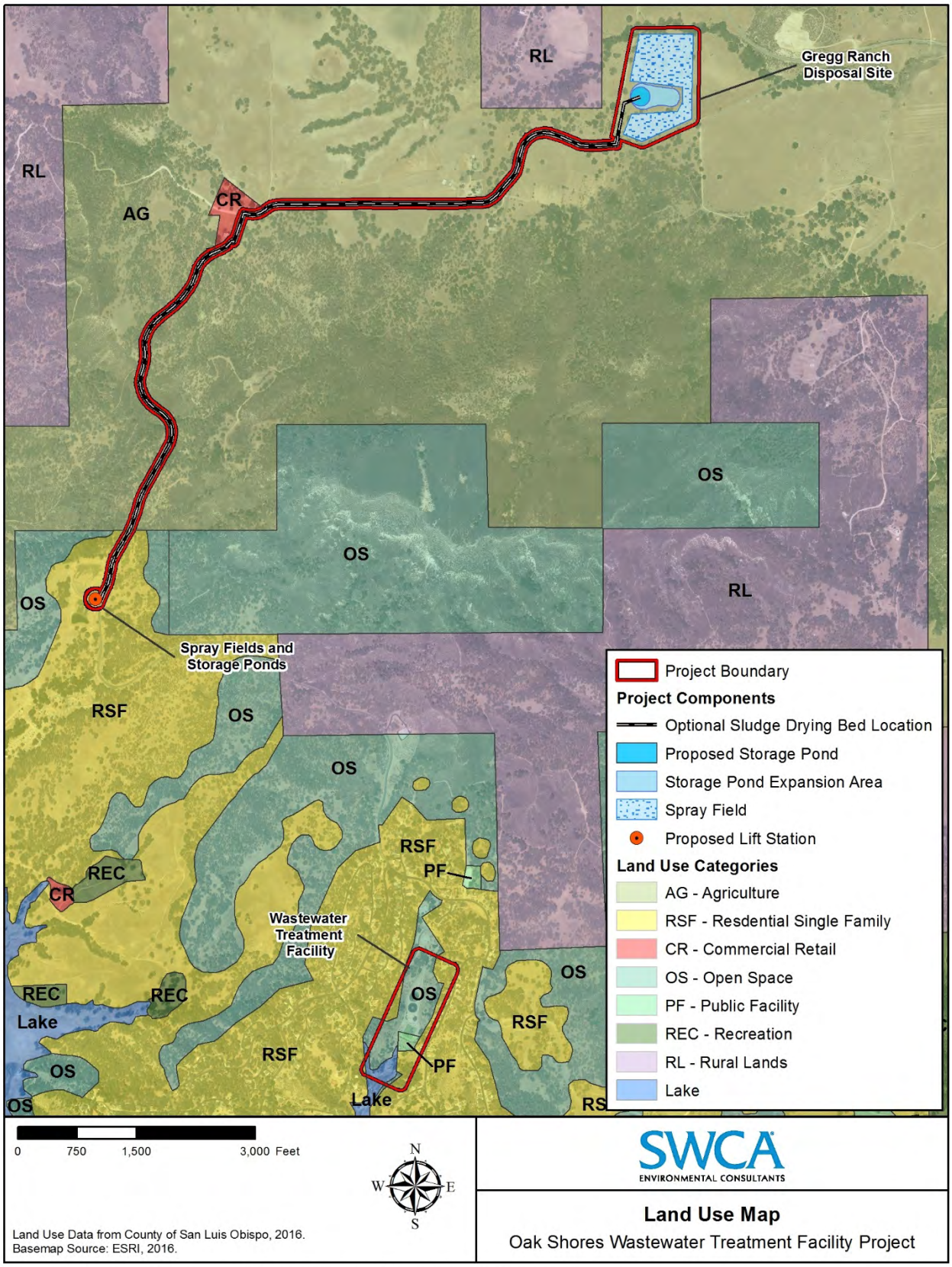


Figure 4.6-1. Land use designations.

4.6.1.1.2 LIFT STATION AND 2.0-MILE-LONG FORCE MAIN PIPELINE

The proposed lift station would be located adjacent to the existing spray field and storage pond location just west of Oak Shores Drive within the Oak Shores Village reserve area, approximately 1.5 miles northwest of the existing WWTF and 2.0 miles southeast of Gregg Ranch. The land use designation for this site is Residential Single Family. This portion of the site is also within the Geological Study and Sensitive Resource Area combining designations. Land use designations surrounding the site include Agriculture, Open Space, and Rural Lands. Surrounding land uses include cattle grazing and a private campground to the south and undeveloped hilly woodlands and grasslands to the east, north, and west.

The proposed 2.0-mile-long force main pipeline would be installed along the western edge of the County's Oak Shores Drive right-of-way and the northern edge of the County's Lynch Canyon Road right-of-way, between the existing spray field and storage pond location and the proposed Gregg Ranch disposal site. The pipeline would traverse the following land uses within and adjacent to the Oak Shores VRL: Residential Single Family, Open Space, Commercial Retail, and Agriculture. A portion of the proposed pipeline that would be located adjacent to the existing spray field and storage pond location within the Oak Shores VRL is within the Geological Study and Sensitive Resource combining designations. A portion of the proposed pipeline that would be located along Oak Shores Drive outside of the Oak Shores VRL is within the Sensitive Resource combining designation. There are no combining designations that apply to the portion of the proposed pipeline that would traverse Lynch Canyon Road.

Surrounding lands uses within the Oak Shores VRL include Residential Single Family and Open Space. Surrounding land uses outside of the Oak Shores VRL include Agriculture and Rural Lands. Oak Shores Drive and Lynch Canyon Road are generally surrounded by lands that are undeveloped and designated Agriculture, with the exception of the Oak Shores Village Entrance (designated Commercial Retail). A majority of the surrounding parcels are subject to existing Williamson Act contracts.

4.6.1.1.3 SLUDGE DRYING BEDS

New sludge drying beds are proposed to be located either within the existing WWTF or adjacent to the new storage ponds and spray fields at Gregg Ranch (refer to previous discussion on Gregg Ranch). The existing WWTF is located 1.5 miles southeast of the existing spray field and storage pond location within the Open Space and Public Facilities land use categories and the Geologic Study Area combining designation. The WWTF is located on slightly sloping terrain located at the bottom of steep hillsides. Vegetation surrounding the facility consists of thick oak woodland and scrub vegetation.

As shown in Table 4.6-1, land use designations directly surrounding the existing wastewater treatment facility include Residential Single Family to the north, east, and west, and Open Space to the north and south. Existing uses of the surrounding lands consists primarily of single-family residences on surrounding ridgelines and Lake Nacimiento to the south.

Table 4.6-1. Surrounding Land Uses within 0.25 Miles of Proposed Facilities

Site	Surrounding Area	Land Use Category	Existing Uses
Gregg Ranch Site	North	Rural Lands, Recreation	Undeveloped, grazing land
	South	Agriculture	Undeveloped, oak woodland
	East	Agriculture	Undeveloped, grazing, Interlake Road
	West	Agriculture, Rural Lands	Undeveloped, Ranchos Dos Amantes Ranch, agricultural facility

Site	Surrounding Area	Land Use Category	Existing Uses
2.0-Mile Force Main Pipeline	North, South, East, and West	Agriculture, Rural Lands, Commercial Retail, Open Space, Residential Single Family	Dry farming, grazing land, single-family residences
Lift Station Site	North	Residential Single Family, Open Space, Agriculture	Undeveloped oak woodland
	South	Residential Single Family	Undeveloped oak woodland
	East	Residential Single Family, Open Space	Undeveloped oak woodland, grassland
	West	Open Space, Agriculture	Oak Shores Drive, undeveloped oak woodland
Existing Wastewater Treatment Facility Site	North	Open Space, Residential Single Family	Single-family residences
	South	Open Space	Lake Nacimiento
	East	Residential Single Family	Single-family residences
	West	Residential Single Family	Single-family residences

Source: County of San Luis Obispo 2018.

4.6.2 Regulatory Setting

4.6.2.1 Federal Policies and Regulations

There are no federal policies that specifically regulate the project's proposed land uses.

4.6.2.2 State Policies and Regulations

Aside from CEQA, there are no state policies that specifically regulate the project's proposed land uses.

4.6.2.3 Local Policies and Regulations

The proposed project was analyzed for consistency with County plans and policies set forth in the County LUO (though not applicable to the proposed project) and General Plan. Consistency with applicable plans and policies is also discussed, in Chapter 3, Environmental Setting.

4.6.2.3.1 COUNTY OF SAN LUIS OBISPO INLAND FRAMEWORK FOR PLANNING

The first part of the County Land Use and Circulation Elements (LUCE) is the Framework for Planning. The Inland Framework contains policies and procedures that apply to the unincorporated area outside the coastal zone and defines how the Land Use Element is used together with the LUO and other adopted plans. The Inland Framework also explains the criteria used in applying land use categories and combining designations to the land, and the operation of the Resource Management System. Combining designations are special map categories that identify areas of unique resources or potential hazards that necessitate more careful project review.

4.6.2.3.2 COUNTY OF SAN LUIS OBISPO NORTH COUNTY AREA PLAN

The project lies within the unincorporated area of San Luis Obispo County, and outside of the California Coastal Zone, in the area of the North County (Inland) Area Plan. The plan acts as a guide for the

cohesive and comprehensive development of the North County (Inland) Area, and seeks to guide future development that will balance the social, economic, environmental and governmental resources and activities affecting the quality of life within the area. This plan includes planning area standards for the rural and urban portions of the North County Planning Area, including the agricultural and rural lands of Nacimiento. This plan describes population, housing, and economic trends for the North County planning area and establishes policies and programs for land use, circulation, public facilities, services, and resources for the rural portions of the planning area.

4.6.2.3.3 COUNTY OF SAN LUIS OBISPO NACIMIENTO AREA PLANNING STANDARDS

The Nacimiento Area Plan acts as a guide for the cohesive and comprehensive development of the Nacimiento Area, and seeks to preserve the character of the communities and rural areas that currently exist in the area. This plan includes planning area standards for the County of San Luis Obispo Nacimiento Planning Area, which includes Oak Shores Village.

4.6.2.3.4 COUNTY OF SAN LUIS OBISPO GENERAL PLAN

Conservation and Open Space Element

The COSE consists of a policy and program document and a technical appendix. The COSE policy and program document includes separate chapters to address air quality, biological resources, cultural resources, energy, mineral resources, open space, visual resources, and water resources. The technical appendix includes the County's first baseline GHG emissions inventory. The COSE is based on the principles of smart growth, with the intent to preserve unique or valuable natural resources, to manage development within the sustainable capacity of the county's resources, and to reduce the county's contribution to global climate change.

Noise Element

The Noise Element (adopted May 5, 1992) provides a policy framework for addressing potential noise impacts in the planning process, and minimizing future noise conflicts. The Noise Element identifies transportation-related, stationary, and potential operational noise generators in the county, provides a list of noise-sensitive land uses, and identifies acceptable and unacceptable thresholds of noise exposure based on land use. The document also provides mitigation measures that should be applied to projects when noise attenuation is required to meet identified thresholds.

Safety Element

The two primary principles of the Safety Element are emergency preparedness and managed development to reduce risk. The Safety Element identifies potential emergency situations and natural disasters within the county, and includes goals and policies for response during an emergency or natural disaster and the avoidance of unnecessary risk.

Oak Shores Village Plan

The Oak Shores Village Plan is part of the LUCE of the County of San Luis Obispo General Plan. This plan describes County land use and transportation programs for a 20-year time frame in the Oak Shores Village area, including regulations also adopted in the LUO and Land Use Element.

4.6.3 Thresholds of Significance

The significance of impacts on land use was determined by the County consistent with criteria listed in Appendix G of the CEQA Guidelines. For the purpose of this SEIR, a project will have a significant effect on the environment if it would:

a. Be potentially inconsistent with land use, policy/regulation (e.g., general plan [county land use element and ordinance], local coastal plan, specific plan, Clean Air Plan, etc.) adopted to avoid or mitigate for environmental effects;

b. Be potentially inconsistent with any habitat or community conservation plan;

c. Be potentially inconsistent with adopted agency environmental plans or policies with jurisdiction over the project; or,

d. Be potentially incompatible with surrounding land uses.

4.6.4 Impact Assessment and Methodology

The analysis and evaluation of land use impacts was conducted qualitatively based on existing land use policies and the existing land use setting. The potential impacts resulting from implementation of the proposed project were analyzed against the ordinance standards and General Plan policies whose purpose it is to remedy the impacts. Chapter 3, Environmental Setting, of this SEIR describes the applicable land use plans and policies and provides an analysis of the consistency of the proposed actions with these plans and policies.

4.6.5 Project Specific Impacts and Mitigation Measures

4.6.5.1 Consistent with Plans and Policies

Section 15125(d) of the State CEQA Guidelines requires an analysis of the project's potential to "conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect." While CEQA requires a discussion of consistency with public plans, inconsistency does not necessarily lead to a significant impact. Inconsistency with public plans creates significant impacts under CEQA only when an adverse physical effect on the environment would result from the inconsistency.

Although County Public Works projects are exempt from Title 22, it should be noted that public facilities are an allowable use within the County Agriculture land use designation. Based upon an initial review of consistency, the proposed project would not substantially conflict with applicable land use policies that were adopted for the purpose of avoiding or mitigating environmental effects. The proposed uses are allowed within the project site's existing land use designations and would generally be consistent with the General Plan (see Table 3-1, Consistency with Plans and Policies, in Chapter 3). Therefore, the project would not result in inconsistencies that could lead to other project-related actions or changes that could result in adverse physical effects on the environment. Although construction of the proposed Gregg Ranch disposal site, lift station and 2.0-mile-long force main pipeline, and new sludge drying beds could affect surrounding land uses, any disruptions would be temporary and limited to the project's construction phase.

Potential impacts related to consistency with applicable plans and polices would be less than significant. No mitigation measures are required.

4.6.5.2 Consistent with any Habitat or Community Conservation Plan

There are no Habitat or Community Conservation Plans within the immediate vicinity of the project site. Therefore, no impacts would occur.

4.6.5.3 Consistent with Adopted Agency Environmental Plans or Policies

The County Public Works Department will be responsible for ensuring compliance with the mitigation measures certified in the Final SEIR. In addition, the County is required to obtain RWQCB approval of the Revised Report of Waste Discharge (ROWD), which will supersede the previous Waste Discharge Requirements (WDR) Order No. 01-130 for the treatment facility. Implementation of identified mitigation measures and preparation of a new WDR will ensure compliance with RWQCB requirements and local planning policies and standards. There are no other adopted agency environmental plans applicable to the proposed project. Therefore, potential impacts related to consistency with adopted agency environmental plans or policies would be less than significant.

4.6.5.4 Compatible with Surrounding Land uses

The proposed lift station and pipeline would be subsurface and their uses would be considered compatible with their surrounding environment. The proposed sludge drying beds at the existing Oak Shores WWTF location would be considered compatible with its surrounding land uses as public utility facilities are present onsite.

A comprehensive site feasibility analysis was conducted in preparation of the 2008 Oak Shores WWTP EIR that identified several alternative sites for the proposed wastewater treatment facility upgrades. The "Smith Alternative" identified an alternative site located just west of Tierra Redonda Mountain within the Tierra Redonda SRA just north of the Oak Shores Village Reserve Line (Morro Group Inc. 2008). The "Northwest Area Alternative" identified an alternative site west of the Smith site. The "Smith Alternative" was eventually dismissed due to the determination that the site did not hold sufficient potential as an effluent disposal site due to hydrologic and soil conditions on site. The "Northwest Area Alternative" was eventually dismissed because it was determined not to be a viable location for the spray fields and due to the rugged conditions of the property (Morro Group Inc. 2008).

The proposed Gregg Ranch disposal site would introduce new uses within this portion of the project area. The proposed storage pond, spray field, and sludge drying beds (if constructed at this location) would be potentially incompatible with the surrounding largely undeveloped, rural, agricultural setting. Mitigation measures have been recommended in Section 4.1 Aesthetics, Section 4.3 Air Quality, and Section 4.4 Biological Resources that would modify the proposed disposal site to further buffer disposal facilities from adjacent uses and improve its compatibility with its surrounding environment. Therefore, potential impacts associated with incompatible land uses would be less than significant with mitigation (Class II).

In addition to potential nuisance issues described above, the proposed spray field could be considered incompatible with adjacent land uses if groundwater quality was significantly affected. As described in the 2008 SEIR, the WWTF improvements would produce a higher quality effluent, which would reduce nitrate levels to approximately 7 milligrams per liter (mg/l). Drinking water standards allow for up to 45 mg/l. Further, based on the revised spray field configuration, parcel boundaries, review of available well records, and review of aerial photos, the closest groundwater wells appear to be located a minimum of 1,200 feet away from the proposed spray field. Based on available well records, groundwater is a

minimum of 60 feet below grade, and in some areas is more than 100 feet below the ground surface. The Draft Wastewater System Capacity Study Addendum No. 2 prepared for the project concluded that no water would be discharged via deep percolation; all proposed discharges would be taken up by the annual evapotranspiration rate (Wallace Group 2018; Appendix D). These conditions, along with the limited (or no) quantity of effluent that may percolate deeply, make it unlikely that effluent would impact groundwater quality. It is likely that the RWQCB will require groundwater monitoring at wells both up and downgradient from the spray field when they issue a ROWD; nevertheless, the installation of groundwater monitoring wells has been included as a mitigation measure below.

LU Impact 1	
The proposed Gregg Ranch disposal site would be potentially incompatible with surrounding adjacent land uses, resulting in a potentially significant, long-term impact *(Class II, less than significant with mitigation)*.	
Mitigation Measures	
Implement mitigation measures AES/mm-1.1, AES/mm-1.2, AES/mm-3.1.	
Implement mitigation measures AQ/mm-2.1 through AQ/mm-2.3.	
Implement mitigation measures BIO/mm-2.5.	
LU/mm-1	*During the ROWD process the County shall coordinate with the RWQCB to locate, construct and monitor groundwater monitoring wells at the Gregg Ranch, if determined to be necessary by the RWQCB. The wells shall be placed and monitored in such a manner as to provide verification that applicable Central Coast Basin Plan criteria have been met throughout the life of the project. Well monitoring requirements implemented at project start-up, and subsequently, will be at the discretion of the RWQCB.*
Residual Impacts	
With implementation of these measures, residual impacts would be less than significant.	

4.6.6 Cumulative Impacts

Project-related land use impacts would be avoided or minimized to less than significant through implementation of the mitigation measures described in this SEIR. Cumulative development in the project area (widely scattered rural residential development consistent with past and projected growth rates) would be compatible uses, similar to and consistent with existing rural residential uses in areas surrounding the project. Therefore, there are no past, present, or reasonably foreseeable future projects that would potentially contribute to cumulative land use impacts. The project's proposed uses would be consistent with the land use designation and policies applicable to the project site. The project would comply with all applicable policies and regulations related planning and environmental resources. Therefore, potential cumulative land use impacts would be less than significant (Class III).

CHAPTER 5. OTHER CEQA CONSIDERATIONS

5.1 GROWTH-INDUCING IMPACTS

California Environmental Quality Act (CEQA) Guidelines Section 15126.2(d) requires that Environmental Impact Reports (EIRs) provide a discussion of the growth-inducing impacts of the proposed project. Growth-inducing impacts could be caused by projects that foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Growth-inducing impacts can also be caused by removing obstacles to population growth such as an expansion of a wastewater treatment plant. Growth-inducing impacts can result from population increases that require the construction of new community services facilities.

In general terms, a project may induce spatial, economic, or population growth in a geographic area if it meets any of these four criteria:

- Removal of an impediment to growth (e.g., establishment of an essential public service or the provisions of new access to an area);
- Economic expansion or growth (e.g., changes in revenue base, employment expansion);
- Establishment of a precedent-setting action (e.g., an innovation, a change in zoning or general plan amendment approval); or
- Development or encroachment in an isolated area or one adjacent to open space (being different from an "infill" type of project).

Should a project meet any one of the above listed criteria, it can be considered growth inducing. The impacts of the proposed project are evaluated below with regard to these four criteria.

5.1.1 Removal of an Impediment to Growth

The proposed upgrades to the wastewater treatment facility (WWTF), effluent and sludge disposal system, and sewage collection system would result in the establishment of an essential public service to an area previously constrained for growth. The proposed project would increase the WWTF capacity to serve an additional 285 residential units (1,197 total units) and allow for development of Phases II–VI of Oak Shores II/Tract 2162. Under this criterion, the proposed project is considered growth inducing. However, plans for this development area have already been approved by the County of San Luis Obispo (County) and this project is primarily intended to meet the needs of the approved development. Therefore, this project is not initiating community growth, but expanding its service capacity to serve an approved, planned development area that has been found to be consistent with the Nacimiento Area Land Use Plan of the County of San Luis Obispo General Plan.

5.1.1.1 Oak Shores II Development Background

In 1984, the County approved a tentative tract map for Oak Shores II (Tract 1291), and an EIR was certified for this project. At that time, the EIR and the County Board of Supervisors concluded that the project was consistent with the Land Use Element of the General Plan and the adopted Phasing Plan for Oak Shores. The project was located in the east neighborhood of the Oak Shores Village area. The Oak Shores II development envisioned 368 units. However, the original tentative tract map expired, and Oak Shores II was resubmitted in 1995 as Tract 2162, requesting a reapproval of the tract map that was approved in 1984. After producing and certifying a Supplemental EIR, the County approved Tract 2162 in 1996. The Supplemental EIR evaluated new information and changed circumstances with regard to the

Oak Shores II/Tract 2162 project. The Supplemental EIR found that the development of Tract 2162 would be inherently growth inducing because it extended streets (and utilities) and secondary emergency access to undeveloped parcels in the east neighborhood. However, the growth-inducing effect was considered consistent with the orderly development of the community pursuant to the General Plan.

The 1996 approved tentative map for Oak Shores II proposed 368 new residential parcels and several open space areas in six phases. Phase I, consisting of 60 residential parcels, has received final map approval and been issued "will-serve" letters for each parcel. Phases II–VI consist of 285 residential parcels, reflecting an overall decrease of 23 parcels from the tentative map. Oak Shores traditionally is a vacation destination, and homes have an estimated future full-time 30% occupancy rate (Wallace Group 2015; Appendix D). The actual current daily occupancy rate is 27%; the average daily occupancy rate for future planning is conservatively assumed to be 40%. Assuming 2.3 persons per dwelling unit and 100% occupancy during peak times, Phases II–VI of Oak Shores II/Tract 2162 would generate a population increase of 656 persons.

In 2006, the County placed a moratorium on new annexations to the existing wastewater service area due to a lack of capacity in the system. The proposed project increases the capacity of the system to allow for development of Phases II–VI of Oak Shores II/Tract 2162 based on the above population estimates. The project level of growth that would be facilitated by the project is consistent with previous proposed development projects in Oak Shores and the growth-inducing effects of that development as discussed in previous EIRs for Oak Shores II/Tract2162. The project also provides the possible future location of an expanded 40-acre-foot storage pond that would facilitate complete future buildout of Oak Shores. However, this expansion would not be developed upon approval of the project and would require additional review and CEQA evaluation when proposed in the future to accommodate growth beyond that which is currently planned and/or anticipated.

Therefore, potential growth-inducing effects related to the removal of impediments to growth would be less than significant (Class III).

5.1.2 Economic Growth

Economic growth is evaluated to the extent that it would relate directly or indirectly to a physical impact on the environment. Employment due to construction would be limited to mostly short-term temporary labor, and the area contains sufficient work force to provide the labor needed for this project. Therefore, no significant growth in hotel services or workforce labor would occur.

The proposed Oak Shores II development population (maximum of 656 people) that would be accommodated by the wastewater treatment facility upgrade would be adequately accommodated by existing commercial and social facilities already located in Oak Shores, as evaluated in the Oak Shores II EIR and Supplemental EIR. The projected population would not be sufficient to support an increase in businesses in the area but would assist in making them more profitable.

In the long term, the project would permanently employ very few individuals for facility management and maintenance. Therefore, the project would not generate economic growth and no resulting physical impacts would occur that have not been addressed in the Supplemental EIR. Potential impacts related to economic growth would be less than significant (Class III).

5.1.3 Precedent-Setting Action

The proposed project would serve a development that is consistent with the Nacimiento Area Plan and does not include any precedent-setting actions that would directly induce growth (i.e., changes in land use

designation). The project would, however, allow the construction of public utility facilities to service the community of Oak Shores outside of the Oak Shores Village Reserve Line (VRL) due to a lack of appropriate sites within the VRL, a requested approval that has no previous precedence in the county. Approval of this project could set a precedent for future similar approvals for the construction of necessary public facilities outside of urban or village reserve lines to facilitate growth within the reserve line that might not otherwise have been accommodated.

Wastewater disposal is rural in nature and, like solid waste disposal, requires certain conditions to support an adequate location. Available locations to provide these types of public utilities are not always present (or preferred) within urban/village reserve lines and are often better situated in more rural areas. This project has not identified potentially significant and unavoidable impacts related to inconsistent land uses and would not set a precedent for constructing incompatible public facilities in rural areas to facilitate growth in an unincorporated community or village. The circumstances that require placement of these facilities outside of the VRL are fairly unique and are not likely to create a precedence that would be relevant for the large majority of development projects.

Therefore, potential growth-inducing impacts related to precedent-setting actions would be less than significant (Class III).

5.1.4 Development of Open Space

Development of open space is considered growth inducing when it encroaches upon urban-rural interfaces or in isolated localities. Implementation of the proposed project would not result in development or encroachment in an isolated area. The Gregg Ranch project site is undeveloped, designated as Agriculture, and located in a rural community, and the proposed project would introduce structural components to this site. However, the proposed project is rural in nature and generally consistent and compatible with surrounding uses, and the proposed disposal facilities would be buffered from adjacent uses. The site location is also consistent with the County of San Luis Obispo General Plan Land Use Element, which states that community sewage and wastewater facilities should avoid being located in heavily populated areas. Therefore, potential impacts would be less than significant (Class III).

5.2 ENERGY CONSERVATION

In order to assure that energy implications are considered in project decisions, CEQA requires that EIRs include a discussion of the potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful and unnecessary consumption of energy (see Public Resources Code (PRC) Section 21100(b)(3)). According to Appendix F of the State CEQA Guidelines, the goal of conserving energy implies the wise and efficient use of energy including:

1) Decreasing overall per capita energy consumption;
2) Decreasing reliance on natural gas and oil; and
3) Increasing reliance on renewable energy sources.

The proposed project would result in a minor increase in energy demand, including transport of water and wastewater, use of fuels for construction vehicles and operational trips to and from the project, and electricity and natural gas use. The proposed improvements to the Oak Shores WWTF will include an upgraded headworks facility, a new biological treatment system, a new effluent pumping station, and a new disposal pumping station.

Based on the County's County Service Area 7 Energy Report, energy usage associated with the Oak Shores WWTF has been slowly decreasing since 2011, as new and more efficient processes and equipment are utilized. Overall energy use of the proposed WWTF improvements as currently proposed would not be substantially different from those discussed in the 2008 Oak Shores EIR. Due to the limited nature of the project, energy-related impacts would be minor and would not result in the need for additional energy resources. Therefore, potential impacts would be less than significant (Class III).

5.3 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

Section 15126.2(c) of the State CEQA Guidelines states that use of nonrenewable resources during the initial and continued phases of a proposed project may be irreversible if a large commitment of these resources makes their removal, indirect removal, or use thereafter unlikely. This section of the EIR evaluates whether the project would result in the irretrievable commitment of resources or would cause irreversible changes in the environment.

Implementation of the project would not require the substantial use of nonrenewable resources during initial construction or operational phases. Construction-related and operational activities would be limited in nature and would require minimal long-term maintenance or commitment of resources.

The proposed project would result in some habitat conversion to structural uses. Construction of the spray field, storage pond, and optional location of the sludge drying beds at the Gregg Ranch disposal site would result in the conversion of mature oak trees and would result in an aesthetic change, which may be visible to the public. However, design standards and mitigation measures are recommended to preserve oak woodland habitat and increase visual compatibility with the surrounding visual character of the area. Other project components such as the 2.0-mile-long force main pipeline and lift station will be subsurface and therefore already have minimal habitat and aesthetic impacts. The alternative location of the sludge drying beds in the existing WWTF would be consistent with the visual setting and would have no impact on sensitive habitats, and impacts relating to odor would be reduced to less than significant with recommended mitigation measures. Therefore, the proposed project would not result in any significant irreversible environmental changes and potential impacts would be less than significant (Class III).

CHAPTER 6. MITIGATION MONITORING AND REPORTING PROGRAM

6.1 STATUTORY REQUIREMENT

When a Lead Agency makes findings on significant environmental effects identified in an Environmental Impact Report (EIR), the agency must also adopt a "reporting or monitoring program for the changes to the project which it has adopted or made a condition of approval in order to mitigate or avoid significant effects on the environment" (Public Resources Code Section 21081.6(a) and State California Environmental Quality Act (CEQA) Guidelines Sections 15091(d) and 15097). The Mitigation Monitoring and Reporting Program (MMRP) is implemented to ensure that the mitigation measures and project revisions identified in the EIR are implemented. Therefore, the MMRP must include all changes in the proposed project either adopted by the project proponent or made conditions of approval by the Lead or Responsible Agency.

6.2 ADMINISTRATION OF THE MITIGATION MONITORING AND REPORTING PROGRAM

The County of San Luis Obispo (County) is the Lead Agency responsible for the adoption of the MMRP. As the project applicant, the County Public Works Department is also responsible for implementation of the MMRP, in coordination with other government agencies. According to State CEQA Guidelines Section 15097(a), a public agency may delegate reporting or monitoring responsibilities to another public agency or to a private entity that accepts the delegation. However, until mitigation measures have been completed, the Lead Agency remains responsible for ensuring that the implementation of the measure occurs in accordance with the program.

6.3 MITIGATION MEASURES AND MONITORING PROGRAM

Table 6-1 is structured to enable quick reference to mitigation measures and the associated monitoring program based on the environmental resource. The numbering of mitigation measures correlates with numbering of measures found in the Environmental Impact Analysis chapter of this Supplemental EIR (SEIR) (refer to Chapter 4).

Table 6-1. Mitigation Monitoring and Reporting Program

Mitigation Measure	Requirements of Measure	Compliance Method	Verification Timing	Responsible Party
Aesthetics				
AES/mm-1.1	Prior to approval of improvement plans, the applicant shall redesign the footprint of the proposed Gregg Ranch disposal site to retain mature oaks and vegetation between Lynch Canyon Road and the visual screening line shown in Figure 4.1-9. The spray field, storage pond, and sludge drying bed location shall be relocated outside of the visual screening area. Construction of the force main pipeline shall be sited to avoid removal of mature trees and vegetation in the visual screening area. The redesigned disposal site shall be shown on all applicable project plans prior to construction.	Review of revised project plans prior to approval of improvement plans; regular site inspections throughout construction	Prior to approval of improvement plans and throughout construction	County Department of Public Works
AES/mm-1.2	Prior to approval of improvement plans, any proposed fencing and signage at the Gregg Ranch disposal site shall be clearly shown on project plans, including the proposed location and style of fencing and signs. Fencing type shall be the same as that currently utilized at the existing spray field and storage pond location (barbed wire with steel T-post and/or wooden supports) or another fencing type that is consistent with the rural setting (i.e., similar to fences and gates in areas surrounding Gregg Ranch). Signage shall be the minimum amount and size required for safety purposes. The redesigned disposal site shall be shown on all applicable project plans prior to construction.	Review of revised project plans prior to approval of improvement plans; regular site inspections throughout construction	Prior to approval of improvement plans and throughout construction	County Department of Public Works
AES/mm-3.1	Prior to approval of improvement plans, any proposed earthen berms at the Gregg Ranch disposal site shall be clearly shown on project plans, including the proposed location, size, height, and design of each berm. Proposed berms shall be designed to match the natural landscape and shall not include angular (squared) edges or corners. The exterior slopes of proposed earthen berms shall be revegetated to match surrounding areas. The location and type of earthen berms shall be shown on all applicable project plans prior to construction.	Review of revised project plans prior to approval of improvement plans; regular site inspections throughout construction	Prior to approval of improvement plans and throughout construction	County Department of Public Works
Air Quality				
AQ/mm-1.1	All surfaces and materials shall be managed to ensure that fugitive dust emissions are adequately controlled to below the 20% opacity limit, identified in the SLOAPCD's Rule 401, Visible Emissions, and to ensure that dust is not emitted offsite. This applies to surfaces that will be graded, that are currently being graded, or that have been graded, and to all materials, whether filled, excavated, transported, or stockpiled. The following fugitive dust control measures shall be implemented: a. Reduce the amount of the disturbed area where possible; b. Use water trucks or sprinkler systems in sufficient quantities to prevent airborne dust from leaving the site. Increased watering frequency shall be	Implement dust control measures, verify onsite through regular site inspections throughout construction	Prior to approval of improvement plans and throughout construction	County Department of Public Works

Mitigation Measure	Requirements of Measure	Compliance Method	Verification Timing	Responsible Party
	required whenever wind speeds exceed 15 miles per hour. Reclaimed (non-potable) water shall be used whenever possible; c. Since water use is a concern due to drought conditions, the contractor shall have the option to implement the use of a SLOAPCD-approved dust suppressant(s) as a potential alternative to reduce the amount of water used for fugitive dust control. For a list of dust suppressants, see Section 4.3 of the CEQA Air Quality Handbook, available at: http://slocleanair.org/business/landusecega.php. ~~c.~~d. All dirt stockpile areas shall be sprayed daily as needed; and ~~d.~~e. All roadways, driveways, sidewalks, etc. to be paved shall be completed as soon as possible, and building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.			
AQ/mm-1.2	The applicant shall implement the following mitigation measures to minimize nuisance impacts and to significantly reduce fugitive dust emissions: a. Permanent dust control measures identified in the approved project plans shall be implemented as soon as possible following completion of any soil disturbing activities; b. Exposed ground areas that are planned to be reworked at dates greater than one month after initial grading shall be sown with a fast germinating native grass seed and watered until vegetation is established; c. All disturbed soil areas not subject to revegetation shall be stabilized using approved chemical soil binders, jute netting, or other methods approved in advance by the SLOAPCD; d. Vehicle speed for all construction vehicles shall not exceed 15 miles per hour on any unpaved surface at the construction site; e. All trucks hauling dirt, sand, soil, or other loose materials are to be covered or shall maintain at least two feet of freeboard (minimum vertical distance between top of load and top of trailer) in accordance with California Vehicle Code Section 23114; f. Install wheel washers where vehicles enter and exit unpaved roads onto streets, or wash off trucks and equipment leaving the site; and g. Sweep streets at the end of each day if visible soil material is carried onto adjacent paved roads. Water sweepers with reclaimed water shall be used where feasible.	Implement dust control measures, verify onsite through regular site inspections throughout construction	Prior to approval of improvement plans and throughout construction	County Department of Public Works
AQ/mm-1.3	For areas within 1,000 feet of residences, the following additional measures shall apply to the greatest extent feasible: 1. California Diesel Idling Regulations a. On-road diesel vehicles shall comply with Section 2485 of Title 13 of the California Code of Regulations. This regulation limits idling from diesel-fueled commercial motor vehicles with gross vehicular weight ratings of more than 10,000 pounds and licensed for operation on	Implement diesel idling restriction measures and identify truck routes; verify onsite through regular site inspections throughout construction	Prior to approval of improvement plans and throughout construction	County Department of Public Works

Mitigation Measure	Requirements of Measure	Compliance Method	Verification Timing	Responsible Party
	highways. It applies to California and non-California based vehicles. In general, the regulation specifies that drivers of said vehicles: i. Shall not idle the vehicles primary diesel engine for greater than 5 minutes at any location, except as noted in Subsection (d) of the regulation; and ii. Shall not operate a diesel-fueled auxiliary power system (APS) to power a heater, air conditioner, or any ancillary equipment on that vehicle during sleeping or resting in a sleeper berth for greater than 5 minutes at any location when within 1,000 feet of a restricted area, except as noted in Subsection (d) of the regulation. b. Off-road diesel equipment shall comply with the 5-minute idling restriction identified in Section 2449(d)(2) of the CARB's In-Use Off-Road Diesel regulation. c. Signs must be posted in the designated queuing areas and job sites to remind drivers and operators of the state's 5-minute idling limit. d. The specific requirements and exceptions in the regulations can be reviewed at the following websites: www.arb.ca.gov/msprog/truck-idling/factsheet.pdf and www.arb.ca.gov/regact/2007/ordiesl07/frooal.pdf. 2. Diesel Idling Restrictions Near Sensitive Receptors. In addition to the state required diesel idling requirements, the project applicant shall comply with these more restrictive requirements to minimize impacts to nearby sensitive receptors: a. Staging and queuing areas shall not be located within 1,000 feet of sensitive receptors to the greatest extent feasible; b. Diesel idling within 1,000 feet of sensitive receptors shall not be permitted to the greatest extent feasible; c. Use of alternative fueled equipment is recommended; and d. Signs that specify the no idling areas must be posted and enforced at the site. 3. Truck Routing. Proposed truck routes should be evaluated and selected to ensure routing patters have the least impact to residential dwellings and other sensitive receptors, such as schools, parks, day care centers, nursing homes, and hospitals.			
AQ/mm-1.4	Prior to construction, the applicant shall obtain California statewide portable equipment registrations or a SLOAPCD permit for any portable construction equipment or engine with 50 horsepower or greater to be used for project construction.	Review copies of permits	Prior to construction	County Department of Public Works

Mitigation Measure	Requirements of Measure	Compliance Method	Verification Timing	Responsible Party
AQ/mm-1.5	Demolition/Asbestos. Demolition activities can have potential negative air quality impacts, including issues surrounding proper handling, abatement, and disposal of asbestos containing material (ACM). Asbestos containing materials could be encountered during the demolition or remodeling of existing structures or the disturbance, demolition, or relocation of above or below ground utility pipes/pipelines (e.g., transite pipes or insulation on pipes). If this project will include any of these activities, then it may be subject to various regulatory jurisdictions, including the requirements stipulated in the National Emission Standard for Hazardous Air Pollutants (40 CFR 61, Subpart M – asbestos NESHAP). These requirements include but are not limited to: 1) written notification, within at least 10 business days of activities commencing, to the SLOAPCD, 2) asbestos survey conducted by a Certified Asbestos Consultant, and 3) applicable removal and disposal requirements of identified ACM. Please contact the SLOAPCD Engineering & Compliance Division at (805) 781-5912 or go to http://slocleanair.org/rules-regulations/asbestos.php for further information. To obtain a Notification of Demolition and Renovation form go to the "Other Forms" section of http://slocleanair.org/library/download-forms.php.	Verify any need for demolition; if necessary, review proof of compliance with asbestos NESHAP	Prior to approval of improvement plans	County Department of Public Works
AQ/mm-2.1	Prior to issuance of construction permits, the County shall submit an Odor Control Plan to the SLOAPCD for review and approval. This plan shall identify and describe potential odor sources, describe sludge handling procedures, and include odor control strategies, including implementation of the nitrate reduction treatment process and staff maintenance check and monitoring schedules. The plan shall identify the contact information for an appropriate person at the County and SLOAPCD who shall be responsible for receiving and managing odor complaints. The plan shall identify options for reducing odor in the event of a complaint.	Submit Odor Control Plan to APCD, provide approved plan prior to final inspection	Prior to approval of improvement plans, prior to final inspection	County Department of Public Works, SLOAPCD
AQ/mm-2.2	Prior to approval of the improvements plans, the applicant shall show the proposed sludge drying beds at the existing Oak Shores WWTF on Ridge Rider Road and not at the Gregg Ranch Disposal Site. The sludge drying beds shall be lined and shall include a drainage system that allows for the collection of leachate for further treatment, if necessary. The selected sludge drying bed location shall be shown on all applicable project plans prior to construction.	Review of revised project plans prior to approval of improvement plans; regular site inspections throughout construction	Prior to approval of improvement plans and throughout construction	County Department of Public Works
AQ/mm-2.3	Prior to approval of the improvement plans, the applicant shall design the effluent discharge system to minimize the potential for offsite drift. The use of sprinklers or misters that exceed the height of the surrounding berm and that would allow for effluent to drift offsite shall be prohibited.	Review of revised project plans prior to approval of improvement plans; regular site inspections throughout construction	Prior to approval of improvement plans and throughout construction	County Department of Public Works

Mitigation Measure	Requirements of Measure	Compliance Method	Verification Timing	Responsible Party
Biological Resources				
BIO/mm-1.1	Prior to initiation of any site preparation/construction activities, the County shall implement the following: a. A County-approved biologist shall conduct a preconstruction survey of the project area no more than 30 days and no less than 14 days prior to the commencement of ground disturbance in previously undisturbed areas of the project site. If any evidence of occupation of that portion of the project site by listed or other special-status plant or animal species is observed, a buffer shall be established by the qualified biologist that results in sufficient avoidance to comply with applicable regulations. If sufficient avoidance cannot be established, the County shall coordinate with the USFWS and/or the CDFW for further guidance to avoid/minimize potential impacts. Copies of the preconstruction survey and results, as well as all permits and evidence of compliance with applicable regulations, shall be submitted to the County. b. A County-approved biologist shall conduct an education and training session for all construction personnel. At a minimum, the training will include a description of the natural history of the species with the potential to be affected by the proposed project and their habitats. Training will include the general measures that are being implemented to conserve these species as they relate to the proposed project, the penalties for non-compliance, and the boundaries of the work area within which the project must be accomplished. To ensure that employees and contractors understand their roles and responsibilities, training may have to be conducted in languages other than English. c. Because of the potential for impacts to coast horned lizard (observed in scrub habitat within the project site in 2016) and nesting birds, a County-approved biologist shall monitor the removal of trees that could support nesting birds and construction within chaparral/scrub habitats that could support coast horned lizard. Coast horned lizards observed in work areas during monitoring shall be captured and relocated to suitable habitat outside of work areas to avoid injury or mortality. Any proposal for capture and relocation of coast horned lizards shall be coordinated with CDFW prior to construction to ensure these efforts are in compliance with the State of California Fish and Game Code.	Retain biological monitor, review training sign-in-sheets and weekly monitoring reports, verify compliance through regular site inspections throughout construction	Within 30 days and no less than 14 days prior to onset of ground disturbance activities, during construction	County Department of Public Works
BIO/mm-1.2	Prior to and during any site preparation and/or construction activities associated with the proposed project, the County shall ensure the following general protective measures are implemented: a. Should a special-status species or avian species protected under the MBTA, or their dens/burrows/nests, be discovered within the project boundary, the following shall occur: i. All work within 100 feet of the discovery shall cease immediately. ii. The Resident Engineer or their onsite designee shall be	Retain biological monitor, review training sign-in-sheets and weekly monitoring reports, verify compliance through regular site inspections throughout	Prior to and during any site preparation and/or construction activities	County Department of Public Works

Mitigation Measure	Requirements of Measure	Compliance Method	Verification Timing	Responsible Party
	immediately notified. iii. A qualified biologist shall determine if notification and/or consultation with regulatory agencies is required, and how to proceed with the project and avoid take. b. Project employees will be directed to exercise caution when commuting within the project area. A 15-mile-per-hour speed limit will be enforced on unpaved roads. c. Project employees will be provided with written guidance governing vehicle use, speed limits on unpaved roads, fire prevention, and other hazards. d. A litter control program shall be instituted at the project site. All workers shall ensure their food scraps, paper wrappers, food containers, cans, bottles, and other trash from the project area are deposited in covered or closed trash containers. The trash containers shall be removed from the project area at the end of each working day. e. No canine or feline pets or firearms (except for federal, state, or local law enforcement officers and security personnel) shall be permitted on construction sites to avoid harassment, killing, or injuring of listed species. f. All construction activities shall be confined within the project construction area, as identified on the final construction plans. At no time shall equipment or personnel be allowed to adversely affect areas outside the project site. g. All excavated, steep-walled holes or trenches more than 2 feet deep shall be covered at the close of each working day by plywood or similar materials. If the trenches cannot be closed, one or more escape ramps constructed of earthen-fill or wooden planks shall be installed no greater than 200 feet apart. Before such holes or trenches are filled, they shall be thoroughly inspected for trapped special-status species which were identified during the project's education session. h. All pipes and culverts shall be searched for species identified during the project's education session prior to being moved or sealed. Should any special-status species be discovered within a pipe or culvert, that section of pipe or culvert shall not be moved or sealed. Any special-status species found in a pipe or culvert shall be allowed to vacate unimpeded. i. Tightly woven fiber netting or similar material shall be used for erosion control or other purposes at the project site to ensure that special-status species do not get trapped. This limitation will be communicated to the contractor through use of Special Provisions included in the bid solicitation package. j. Use of rodenticides and herbicides at the project site shall be prohibited to prevent primary or secondary poisoning of special-status species and depletion of prey populations on which they depend.	construction		

Mitigation Measure	Requirements of Measure	Compliance Method	Verification Timing	Responsible Party
BIO/mm-1.3	To protect special-status avian species and those species protected by the MBTA and California Fish and Game Code Section 3503, including bald and golden eagles, which are known to exist in the project vicinity and may start nesting earlier than other species, vegetation clearing and earth disturbance should be avoided from January 1 to September 1. If avoiding construction during this season is not feasible, a qualified biologist shall survey the area within 1 week prior to activity beginning onsite. If nesting birds are located on or near the proposed project site, they shall be avoided until they have successfully fledged. A buffer zone of 50 feet will be placed around all nonsensitive, passerine bird species, and a 250-foot buffer will be implemented for raptor species, and all activity will remain outside of that buffer until the qualified biologist, has determined that the young have fledged. Buffer reductions and/or work within non-disturbance buffer areas can be completed only with approval from relevant resource agencies. If nesting bald or golden eagles are detected during surveys, applicable resource agencies will be consulted for guidance.	Retain biological monitor, review training sign-in-sheets and weekly monitoring reports, verify compliance through regular site inspections throughout construction	Prior to and during any site preparation and/or construction activities	County Department of Public Works
BIO/mm-1.4	Prior to and during any site preparation and/or construction activities associated with the proposed project, the County shall ensure the following protective measures are implemented to avoid impacts to roosting bats: a. Prior to commencement of tree removal associated with construction, the County will schedule tree removal to occur outside of the typical bat maternity roosting and pupping season if possible to avoid potential impacts to bats. The typical bat maternal roosting season is defined as occurring from February 1 to August 31; therefore, tree removal activities should be scheduled to occur from September 1 to February 14, if possible. b. Prior to commencement of tree removal associated with construction, if tree removal must occur during the typical bat maternity roosting season (February 1 to September 1), tree-removal activities will not be allowed unless a County-approved, qualified biologist has surveyed the impact area within 14 days prior to commencement of proposed construction activities and determined that no roosting bats will be adversely impacted. Roosting bat surveys will only be considered valid for 14 consecutive days before they will need to be repeated. At such time, if any evidence of bat roosting is found, the biologist will determine if any construction activities can occur during roosting and to what extent. The results of the surveys will be submitted to the County Environmental Coordinator and the CDFW, possibly with recommendations for variable buffer zones, as needed, around individual roosting sites. Based on the results of the surveys, the County shall implement the following: i. If no bat roosting activities are detected within the proposed work area, tree-removal and noise-producing construction activities may proceed and no further mitigation is required. ii. If bat roosting activity is confirmed during preconstruction roost surveys or at any time during the monitoring of construction activities, at a minimum, work activities will be avoided within 100 feet of active roosts until bats have left the roosts. No trees with active bat roosts may be removed until they have left the roosts	Retain biological monitor, review training sign-in-sheets and weekly monitoring reports, verify compliance through regular site inspections throughout construction	Prior to and during any site preparation and/or construction activities	County Department of Public Works

Mitigation Measure	Requirements of Measure	Compliance Method	Verification Timing	Responsible Party
	or have been excluded from roosts. c. Prior to commencement of tree removal associated with construction, if bats would be removed from roosts, the County will prepare a Bat Exclusion Plan to exclude the species from trees scheduled for removal. To reduce impacts to roosting bats, this plan will discuss methods of eliminating bat access to the identified roosting habitat prior to construction so that bats are not able to return to and occupy the roost. The appropriate timing for exclusion implementation will be determined based upon the species identified as occurring within the project site. Roost areas will be surveyed by a qualified biologist prior to implementing exclusion methods to ensure that no bats become trapped. Exclusion methods may include, but are not limited to, wire mesh, spray foam, or fabric placement. This plan will be submitted to the CDFW for regulatory approval. d. Following construction, if the County-approved biologist determined that roosting bats used any removed trees at any time for roosting prior to removal, features to enhance bat habitat will be incorporated into the project. Appropriate habitat enhancement features could include the installation of bat boxes on remaining trees to enhance bat night, day and nursery roosting habitat. The design and style of the bat boxes will be appropriate to the species identified utilizing the trees that were removed.			
BIO/mm-1.5	Prior to and during any site preparation and/or construction activities associated with the proposed project, the County shall ensure the following protective measure is implemented to avoid impacts to Monterey dusky-footed woodrat: a. Prior to commencement of tree removal associated with construction, a County-approved, qualified biologist will survey trees scheduled for removal for woodrat nests. Based on the results of the surveys, the County shall implement the following: i. If no woodrat nests are observed then grading and ground disturbance activities may proceed and no further mitigation is required. ii. If woodrat nests are observed within the project area, the results of the surveys will be submitted to the CDFW, with recommendations for variable buffer zones, as needed, around individual nests and/or relocation of nests and woodrats, if approved by the CDFW.	Retain biological monitor, review training sign-in-sheets and weekly monitoring reports, verify compliance through regular site inspections throughout construction	Prior to and during any site preparation and/or construction activities	County Department of Public Works, CDFW
BIO/mm-1.6	Prior to and during any site preparation and/or construction activities associated with the proposed project, the County shall ensure the following protective measure is implemented to avoid impacts to American badger: a. Prior to commencement of grading and other ground disturbance activities, a County-approved, qualified biologist will survey the footprint of construction areas for active badger dens. Based on the results of the surveys, the County shall implement the following: i. If no active badger dens are observed, grading and ground	Retain biological monitor, review training sign-in-sheets and weekly monitoring reports, verify compliance through regular site inspections throughout	Prior to and during any site preparation and/or construction activities	County Department of Public Works, CDFW

Mitigation Measure	Requirements of Measure	Compliance Method	Verification Timing	Responsible Party
	disturbance activities may proceed and no further mitigation is required. ii. If presence of active badger dens is confirmed during preconstruction surveys or at any time during the monitoring of construction activities, work activities will be avoided within 100 feet of active badger dens. Alternatively, the County Public Works Department may coordinate with the CDFW to determine if badger exclusion or relocation measures are appropriate.	construction		
BIO/mm-2.1	The limits of grading shall be shown on final improvement/construction plans prior to site disturbance. All new construction, site disturbance, and vegetation removal shall be located within the delineated construction boundaries. The storage of equipment and materials, and temporary stockpiling of soil shall be located within designated areas only, and outside of oak woodland habitat and drainages. Construction/improvement plans shall include grading and drainage, as well as erosion and sedimentation control plans.	Review of revised project plans prior to approval of improvement plans; regular site inspections throughout construction	Upon development of final improvement plans, prior to site disturbance and throughout construction	County Department of Public Works
BIO/mm-2.2	Prior to and during any site preparation and/or construction activities associated with the proposed project, the County shall ensure compliance with the following measures to avoid and/or minimize project impacts to potentially jurisdictional waters: a. Prior to disturbance within jurisdictional areas, the County shall obtain a Section 404 Permit from the USACE, a Section 401 Water Quality Certification from the RWQCB, and a Section 1602 Streambed Alteration Agreement from the CDFW for project-related impacts that will occur in areas under the jurisdiction of these regulatory agencies. b. Prior to initiation of any site preparation and/or construction activities, a Storm Water Pollution Prevention Plan for the project will be prepared. Provisions of this plan shall be implemented during and after construction, as necessary, to avoid and minimize erosion and stormwater pollution in and near the work area. c. Prior to any ground-disturbing activities, the County shall ensure jurisdictional waters are delineated with flagging or exclusionary fencing and construction activities will minimize impacts to jurisdictional waters. Since impacts to jurisdictional waters are anticipated to be temporary, these areas will be restored at a 1:1 ratio to approximate their pre-construction condition. d. During construction, erosion control measures shall be implemented. Silt fencing, fiber rolls, and barriers shall be installed as needed between the project site and jurisdictional waters to be avoided. At a minimum, erosion controls shall be maintained by the contractor on a daily basis throughout the construction period. e. During construction, the cleaning and refueling of equipment and vehicles shall occur only within designated staging areas and at least 100 feet from jurisdictional waters.	Obtain resource agency authorizations, or exemptions (as applicable) to demonstrate compliance, verify jurisdictional water measures onsite through regular site inspections throughout construction	Prior to approval of improvement plans and throughout construction	County Department of Public Works

Mitigation Measure	Requirements of Measure	Compliance Method	Verification Timing	Responsible Party
	f. Stream contours shall be restored as close as possible to their original condition.			
BIO/mm-2.3	Prior to initiation of any site preparation and/or construction activities, the County shall ensure all known communities of purple needlegrass grassland located within the project site are delineated with flagging or exclusionary fencing to identify these areas as environmentally sensitive areas (ESAs). If possible, construction activities will avoid all ground disturbing activities within the delineated ESAs to avoid any impacts to this community. If construction activities cannot be avoided within these ESAs, areas with purple needlegrass temporarily impacted as a result of construction will be replanted/restored with purple needlegrass at a 1:1 ratio (anticipated to be 0.2-acre total). To guarantee the success of the purple needlegrass restoration, the County will monitor until replanted purple needlegrass is successfully established (i.e., has been restored to existing conditions). Additional monitoring will be necessary if initially-required vegetation is not considered successfully established.	Retain biological monitor, verify onsite through regular site inspections throughout construction	Prior to initiation of any site preparation and throughout construction	County Department of Public Works
BIO/mm-2.4	In addition to implementation of mitigation measure AES/mm-1.1, prior to, during, and following implementation of construction activities, the County shall implement the following measures to avoid and/or minimize project impacts to oak trees: a. Prior to issuance of permits, the applicant shall redesign the footprint of the permanent project components, including the spray fields, storage and sludge ponds, and pipelines to retain existing mature oaks and vegetation to the maximum extent feasible (see Figure 4.4-6). b. The redesigned disposal site shall be shown on all improvement/construction plans and shall be submitted to the County of San Luis Obispo Department of Planning and Building for approval prior to construction. c. Upon development of final construction plans and prior to site disturbance, construction plans will clearly delineate all trees within 50 feet of the proposed project limits, and will show which trees are to be removed or impacted, and which trees are to remain unharmed. Tree removal shall only be allowed immediately prior to the construction of proposed project components. Trees to remain, either permanently or temporarily during the construction of proposed upgrades, shall be protected to prevent unnecessary tree removal. d. Upon development of final construction plans and prior to site disturbance, the County will organize all mitigation measures applicable to oak trees and oak woodland habitat requirements into a single Oak Tree Mitigation Plan to ensure coordination of all oak tree related measures. A copy of this plan will be included in the project's special provisions. In addition to other adopted mitigation measures, this plan will incorporate the following measures: i. All oak trees identified to remain, either permanently or temporarily during improvements, will not be removed. Removal activities will be conducted in a manner to minimize effects to	Review of revised project plans prior to approval of improvement plans; regular site inspections throughout construction	Prior to approval of improvement plans and throughout construction	County Department of Public Works

Mitigation Measure	Requirements of Measure	Compliance Method	Verification Timing	Responsible Party
	surrounding oak woodland to remain. ii. Removed trees will be replaced in-kind at a 4:1 ratio and trees impacted but not removed will be mitigated in-kind at a 2:1 ratio. Replanting will be completed as soon as it is feasible (e.g. irrigation water is available and grading activities are complete in proposed replanting areas). Replant areas will be located either in native topsoil or areas where native topsoil has been reapplied. If located in areas where native topsoil has been reapplied, topsoil will be carefully removed and stockpiled for spreading over graded areas to be replanted. The layer of reapplied topsoil shall be a minimum of 6 to 12 inches deep. iii. Seed stock will be collected on-site or in the immediately surrounding area. iv. Location of newly planted trees and/or vegetation/seeds should adhere to the following, whenever possible: on the north side of and at the canopy/dripline edge of existing mature native trees; on north-facing slopes; within drainage swales (except when riparian habitat present); where topsoil is present; and away from continuously wet areas (e.g. lawns, leach lines). v. Newly planted trees will be maintained until successfully established. This will include protection (e.g. tree shelters, exclusionary fencing) from animals (e.g., deer, rodents), regular weeding (minimum of once during early Fall and once during early Spring) of at least a 3-foot radius surrounding the tree/plant and adequate watering (e.g., drip-irrigation system). Watering should be controlled so only enough is used to initially establish the tree/plant, gradually reducing to zero water over a 3-year period. If possible, planting during the warmest, driest months (June through September) will be avoided. In addition, standard planting procedures (e.g., planting tablets, initial deep watering) will be used. vi. Following planting of replacement oak trees, to guarantee the success of the new trees, the County will monitor the new trees' survivability and vigor until the trees are successfully established and prepare monitoring reports on an annual basis for a minimum of 7 years. The first monitoring report shall be submitted to the County Environmental Coordinator 1 year after the completion of replacement planting and thereafter on an annual basis until the monitor, in consultation with the County, has determined that the initially-required vegetation is successfully established. Additional monitoring will be necessary if initially-required vegetation is not considered successfully established. Success criteria for revegetation is 80% survivability within 5 years upon initial planting efforts.			

Mitigation Measure	Requirements of Measure	Compliance Method	Verification Timing	Responsible Party
	vii. The County will maintain compliance with the following measures related to weed removal around newly planted vegetation: 1) no herbicides will be used; and 2) either installation of a securely staked "weed mat" (covering at least a 3-foot radius from center of plant), or hand-removal of weeds (covering at least a three-foot radius from center of plant) will be completed for each new plant (hand-removal weeding will be maintained on a regular basis [at least once in late spring (April) and once in early winter (December)] until plant is 3 feet tall or for 7 years, whichever occurs first. Use of weed-free mulch (at least 3 inches deep) with regular replenishment may be substituted for the weed mat. e. Prior to initiation of construction activities, all trees to remain onsite that are within 50 feet of construction or grading activities will be marked for protection (e.g., with flagging) and their root zone fenced. The outer edge of the tree root zone is 1.5 times the distance from the trunk to the drip line of the tree. Grading, utility trenching, compaction of soil, or placement of fill will be avoided within these fenced areas. If grading in the root zone cannot be avoided, retaining walls may be constructed to minimize cut and fill impacts. Care will be taken to avoid surface roots within the top 18 inches of soil. If any roots must be removed or exposed, they will be cleanly cut and not left exposed above the ground surface. f. Prior to initiation of construction activities, the County will ensure that a qualified biologist verify that oak tree protection measures and purple needlegrass grassland protection measures (as described in BIO/mm-2.4) are correctly implemented. g. All oak trees identified to remain will not be removed. Unless previously approved by the County, the following activities are not allowed within the root zone of existing or newly planted oak trees: year-round irrigation (no summer watering, unless "establishing" new tree or native compatible plant(s) for up to 3 years); grading (includes cutting and filling of material); compaction (e.g., regular use of vehicles); placement of impermeable surfaces (e.g., pavement); disturbance of soil that impacts roots (e.g., tilling). h. If trimming is necessary, the County will retain a County-approved, certified arborist, or apply accepted arborist's techniques, when removing limbs. Unless a hazardous or unsafe situation exists, trimming will be done only during the winter for deciduous species. Smaller trees (smaller than 5 inches in diameter at 4 feet above the ground) within the project area are considered to be of high importance and, when possible, will be given similar consideration as larger trees.			

Mitigation Measure	Requirements of Measure	Compliance Method	Verification Timing	Responsible Party
Cultural Resources				
CR/mm-1.1	Prior to construction activities, the applicant shall have a County-qualified archaeologist conduct a cultural resource awareness training for all construction personnel including the following: a. Review the types of archaeological artifacts that may be uncovered; b. Provide examples of common archaeological artifacts to examine; c. Review what makes an archaeological resource significant to archaeologists and local native Americans; d. Describe procedures for notifying involved or interested parties in case of a new discovery; e. Describe reporting requirements and responsibilities of construction personnel; f. Review procedures that shall be used to record, evaluate, and mitigate new discoveries; and g. Describe procedures that would be followed in the case of discovery of disturbed as well as intact human burials and burial-associated artifacts.	Retain archeologist, review training sign-in sheets and weekly monitoring reports, regular site inspections throughout construction	Prior to construction activities and throughout construction	County Department of Public Works
CR/mm-1.2	Prior to project implementation, the Applicant shall prepare an Archaeological Monitoring Plan (AMP). The AMP shall include (but not be limited to) the following: a. A list of personnel involved in the monitoring activities; b. Description of Native American involvement; c. Description of how the monitoring shall occur; d. Description of frequency of monitoring (e.g., full time, part time, spot checking); e. Description of what resources are expected to be encountered; f. Description of circumstances that would result in the halting of work at the project site; g. Description of procedures for halting work on the site and notification procedures; h. Description of monitoring reporting procedures; and, i. Provide specific, detailed protocols for what to do in the event of the discovery of human remains.	Review and approve plan	Prior to approval of improvement plans	County Department of Public Works
CR/mm-1.3	An archaeological and Native American monitor shall be present during project related ground disturbing activities that have the potential to encounter previously unidentified archaeological resources, as outlined in the AMP prepared to satisfy CR/mm-1.2. Archaeological monitoring may cease at any time if the County-qualified archaeologist, in coordination with project's Environmental Coordinator, determine that project activities do not have the potential to encounter and/or disturb unknown resources.	Retain archaeological and Native American monitor, review weekly monitoring reports, and document compliance through regular site inspections	Throughout construction (as determined necessary by archaeological monitor)	County Department of Public Works

Mitigation Measure	Requirements of Measure	Compliance Method	Verification Timing	Responsible Party
		throughout construction		
CR/mm-1.4	In the event that unknown archaeological resources are inadvertently encountered during the project, all ground disturbing activities shall cease, and the County Environmental Coordinator shall be notified so that the extent and location of discovered materials may be recorded by a qualified archaeologist, and disposition of artifacts may be accomplished in accordance with state and federal law.	Review weekly monitoring reports, and document compliance through regular site inspections throughout construction	Throughout construction	County Department of Public Works
CR/mm-2.1	If human remains are exposed during construction, the Applicant shall notify the County Environmental Coordinator immediately and comply with State Health and Safety Code Section 7050.5, which states that no further disturbance shall occur until the County Coroner has been notified and can make the necessary findings as to origin and disposition of the remains pursuant to PRC Section 5097.98. Construction shall halt in the area of the discovery of human remains, the area shall be protected, and consultation and treatment shall occur as prescribed by law.	Review weekly monitoring reports, and document compliance through regular site inspections throughout construction	Throughout construction	County Department of Public Works
CR/mm-3.1	If any paleontological resources are encountered during ground-disturbing activities, activities in the immediate area of the find shall be halted and the discovery assessed. A qualified paleontologist shall be retained to evaluate the discovery and recommend appropriate treatment options pursuant to guidelines developed by the Society of Vertebrate Paleontology. A paleontological resource impact mitigation program for treatment of the resources shall be developed and implemented if paleontological resources are encountered.	Review weekly monitoring reports, and document compliance through regular site inspections throughout construction	Throughout construction	County Department of Public Works
LU/mm-1	During the ROWD process the County shall coordinate with the RWQCB to locate, construct and monitor groundwater monitoring wells at the Gregg Ranch, if determined to be necessary by the RWQCB. The wells shall be placed and monitored in such a manner as to provide verification that applicable Central Coast Basin Plan criteria have been met throughout the life of the project. Well monitoring requirements implemented at project start-up, and subsequently, will be at the discretion of the RWQCB.	Coordinate with RWQCB, construct and monitor groundwater as necessary	During the ROWD process and throughout project operation	County Department of Public Works

This page intentionally left blank.

CHAPTER 7. REFERENCES AND REPORT PREPARATION

7.1 REFERENCES

County of San Luis Obispo. 2015. *County of San Luis Obispo General Plan, Land Use and Circulation Elements, Framework for Planning (Inland)*. County of San Luis Obispo Planning and Building Department. Revised April 2015.

———. 2017. *County of San Luis Obispo Land Use Ordinance Title 22 of the County Code*. County of San Luis Obispo Planning and Building Department. August 2017.

Morro Group, Inc. 2008. *Final Environmental Impact Report for the County Service Area 7 (Oak Shores) Wastewater Treatment Plant Upgrade Project*. SWCA Environmental Consultants, formerly Morro Group, Inc. May 2008.

SWCA Environmental Consultants. 2008. *Final Environmental Impact Report for the County Service Area 7 (Oak Shores) Wastewater Treatment Plant Upgrade Project*. May 2008.

Wallace Group. 2015. *Wastewater System Capacity Study Addendum No. 2 for San Luis Obispo County Service Area 7-A (Oak Shores)*. January 2015.

———.2018. *Wastewater System Capacity Study Addendum No. 2 for San Luis Obispo County Service Area 7-A (Oak Shores)*. March 2018.

7.1.1 Aesthetics

California Department of Transportation (Caltrans). 2008. *Scenic Highway Guidelines*. October 2008.

County of San Luis Obispo. 2010. *County of San Luis Obispo General Plan, Conservation and Open Space Element*. County of San Luis Obispo Planning and Building Department. May 2010.

———. 2014. *County of San Luis Obispo, Land Use and Circulation Elements (Part II), The Area Plans*. County of San Luis Obispo Planning and Building Department. February 2014.

7.1.2 Agricultural Resources

California Department of Conservation (CDOC). 2014. *Table A-31 San Luis Obispo County 2012–2014 Land Use Conversion.* California Department of Conservation, Farmland Mapping and Monitoring Program. September 2017.

———.2016. *County of San Luis Obispo Farmland Conversion 2014 Field Report*. California Department of Conservation, Farmland Mapping and Monitoring Program. Additional data collected in 2016.

County of San Luis Obispo. 2010a. *County of San Luis Obispo General Plan, Agriculture Element*. County of San Luis Obispo Planning and Building Department. Revised May 2010.

———. 2010b. *County of San Luis Obispo General Plan, Conservation and Open Space Element*. County of San Luis Obispo Planning and Building Department. Revised May 2010.

———. 2015. *Rules of Procedure to Implement the California Land Conservation Act of 1965*. Adopted by the San Luis Obispo County Board of Supervisors June 26, 1972; Revised March 24, 2015.

———. 2017. *2016 Annual Crop Report*. County of San Luis Obispo Department of Agriculture/Weights and Measures. 2017.

U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS). 1984. Soil Survey of San Luis Obispo County, California Coastal Part. 1984.

———. 2018. Web Soil Survey. Available at: https://websoilsurvey.sc.egov.usda.gov/App/HomePage.htm. Accessed August 2017.

7.1.3 Air Quality

AMBIENT Air Quality and Noise Consulting. 2018. *Oak Shores WWTP Air Quality & Emissions Modeling Report*. January 28, 2018.

Carlson, Dean. 2017. Email from Dean Carlson, San Luis Obispo County Air Pollution Control District, to Kurt Legleiter, AMBIENT Air Quality and Noise Consulting, regarding history of odor complaints from the existing Oak Shores WWTF. December 4, 2017.

County of San Luis Obispo. 2011. *County of San Luis Obispo EnergyWise Plan*. November 2011.

San Luis Obispo County Air Pollution Control District (SLOAPCD). 2001. *Clean Air Plan*. December 2001.

———. 2012. *CEQA Air Quality Handbook*. April 2012.

———. 2017a. *Annual Air Quality Report 2016*. November 2017.

———. 2017b. Clarification Memorandum for the San Luis Obispo County Air Pollution Control District's 2012 CEQA Air Quality Handbook. November 2017.

7.1.4 Biological Resources

California Department of Fish and Wildlife (CDFW). 2017. Bald Eagle Breeding Survey Instructions and Nesting Territory Survey Form. September 2017.

Californiaherps.com. 2018. San Joaquin Coachwhip – *Coluber flagellum ruddocki*. Available at http://www.californiaherps.com/snakes/pages/c.f.ruddocki.html. Accessed January 2018.

———. 2018. Blainville's Horned Lizard – *Phrynosoma blainvillii*. Available at http://www.californiaherps.com/lizards/pages/p.blainvillii.html. Accessed January 2018.

California Native Plant Society (CNPS). 2018. Inventory of Rare and Endangered Plants of California (online edition, v8-03 0 0.39). California Native Plant Society, Rare Plant Program. Available at http://www.rareplants.cnps.org. Accessed January 2018.

County of San Luis Obispo. 2010. *County of San Luis Obispo General Plan, Conservation and Open Space Element*. County of San Luis Obispo Planning and Building Department. August 2017.

Garcia and Associates, Pacific Gas and Electric Company. 2004. *Protocol for Evaluating Bald Eagle Habitat and Populations in California*. September 2017.

Sawyer, J., Keeler-Wolf, T., and Evens, J. 2009. *A Manual of California Vegetation*. September 2017.

SWCA Environmental Consultants (SWCA). 2016. *Oak Shores Wastewater Treatment Facility Upgrade Project Biological Resources Assessment*. September 2017.

U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS). 2018. Web Soil Survey. Available at: https://websoilsurvey.sc.egov.usda.gov/App/HomePage.htm. August 2017.

U.S. Fish and Wildlife Service (USFWS). 2010. *Interim Golden Eagle Inventory and Monitoring Protocols; and Other Recommendations*. September 2017.

7.1.5 Cultural Resources

Advisory Council on Historic Preservation (ACHP). 2015. National Register Evaluation Criteria. Available at http://www.achp.gov/nrcriteria.html. Accessed September 2017.

Albion Environmental, Inc. 2016. *Cultural Resource Assessment Services for the Oak Shores Waste Water Facility Project*. December 2016.

County of San Luis Obispo. 2003. *Nacimiento Water Project Environmental Impact Report*. December 2003.

Diblee Geological Foundation. 2006. Geologic Map of the Tierra Redonda Mountain Quadrangle. 2006.

Lynch, Alice Clare. 1935. *The Kennedy Clan and Tierra Redonda*. San Francisco: Marnell & Company.

Lynch, Alice Kennedy. 1857–1865. Photostatic copy of diary covering July 19, 1857, to January 1, 1865, written in French. Also, a typescript of the diary, translated to English by Alice's son, Francis William Lynch, on September 7, 1930, both housed at the Society of California Pioneers, San Francisco.

Lynch, James, and Alice M. Kennedy Lynch. 1874–1910. *Account books of Tierra Redonda Ranch: San Luis Obispo Co., Calif., 1874-1910,* (Four manuscript volumes). Records of sheep ranch, household, and personal accounts, housed in The Bancroft Library, University of California, Berkeley.

Lynch, James Kennedy. 1996. Description of growing up on the sheep ranch at Tierra Redonda, transcribed by his grandson, Ranson VanBrunt Lynch..

Lynch, Nora M. 2009. *Nora M. Lynch Papers, 1878-2009*. Collection of intergenerational family papers associated with the Lynch family, including the author's own experiences at Tierra Redonda in the 1930s, housed in The Bancroft Library, University of California, Berkeley.

Panorama Environmental, Inc. 2017. *Fulton-Fitch Mountain Reconductoring Project Initial Study/Mitigated Negative Declaration, Chapter 3.12 Paleontological Resources*. July 2017.

SWCA Environmental Consultants. 2017. *Oak Shores Wastewater Treatment Plant Upgrade Project Phase I Archeological Survey*. July 2017.

7.1.6 Land Use and Planning

County of San Luis Obispo. 2010a. *County of San Luis Obispo General Plan, Agriculture Element*. County of San Luis Obispo Planning and Building Department. Revised May 2010.

———. 2010b. *County of San Luis Obispo General Plan, Conservation and Open Space Element*. County of San Luis Obispo Planning and Building Department. Revised May 2010.

———. 2014. *County of San Luis Obispo, Land Use and Circulation Elements (Part II), The Area Plans*. County of San Luis Obispo Planning and Building Department. August 2017.

———. 2015. *County of San Luis Obispo General Plan, Land Use and Circulation Elements, Framework for Planning (Inland)*. County of San Luis Obispo Planning and Building Department. Revised April 2015.

———. 2017. *County of San Luis Obispo Land Use Ordinance Title 22 of the County Code*. County of San Luis Obispo Planning and Building Department. August 2017.

———. 2018. Land Use View, San Luis Obispo County Interactive GIS Mapping Tool. County of San Luis Obispo Planning and Building Department. Available at: https://gis.slocounty.ca.gov/Html5Viewer/Index.html?configBase=/Geocortex/Essentials/REST/sites/PL_LUView/viewers/PL_GeoView/virtualdirectory/Resources/Config/Default. Accessed on multiple dates May 2017 through March 2018.

Morro Group, Inc. 2008. *Final Environmental Impact Report for the County Service Area 7 (Oak Shores) Wastewater Treatment Plant Upgrade Project*. SWCA Environmental Consultants, formerly Morro Group, Inc. May 2008.

Wallace Group. 2018. *Wastewater System Capacity Study Addendum No. 2 for San Luis Obispo County Service Area 7-A (Oak Shores)*. March 2018.

7.2 ENVIRONMENTAL IMPACT REPORT PREPARERS

This Supplemental Environmental Impact Report (SEIR) has been prepared by SWCA Environmental Consultants (SWCA), in association with the County of San Luis Obispo. Project Manager for the SEIR was Emily Creel, J.D., and Project Director was Bill Henry, AICP. The following is a list of individuals responsible for preparation of the SEIR.

Table 7-1. EIR Preparers and Responsibilities

Responsibilities	EIR Preparer
Introduction, Project Description, Environmental Setting, Aesthetics, Mitigation Monitoring and Reporting Plan	Emily Creel, SWCA
Executive Summary, Environmental Setting, Aesthetics, Air Quality, Agricultural Resources, Land Use and Planning, Other CEQA Considerations	Cassidy Williams, SWCA Kurt Legleiter, AMBIENT Air Quality and Noise Consulting (air quality technical report)
Biological Resources	Jacqueline McCrory, SWCA Geoff Hoetker, SWCA Barrett Holland, SWCA
Cultural Resources	Leroy Laurie, SWCA Paula Carr, SWCA
Document Graphics	Kevin Howen, SWCA
Technical Editing, Document Compilation	Jaimie Jones, SWCA

This page intentionally left blank.

CHAPTER 8. RESPONSE TO COMMENTS

The Response to Comments chapter of the SEIR includes all comment letters received during public circulation of the County Service Area 7 (Oak Shores) Wastewater Treatment Plant Upgrade Project Supplemental EIR. These comment letters were received from entities including state and local agencies and non-agency organizations. The County did not receive any comments from the general public during the advertised public comment period. In accordance with State CEQA Guidelines Section 15132(d), this Final SEIR presents the County's response to comments submitted during the Draft EIR review and consultation process.

The comment letters are in chronological order with the responses following the individual letters. Comment letters are reproduced in total, and numerical annotation has been added as appropriate to delineate and reference the responses to those comments.

8.1 AGENCY COMMENT LETTERS AND RESPONSES

The following agencies have submitted comments on the Draft EIR.

Respondent	Code	Contact Information	Page
State of California Governor's Office of Planning and Research *Letter dated: July 3, 2018*	SCH	1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044 *Contact: Scott Morgan, Director, State Clearinghouse*	8-2
County of San Luis Obispo Public Works Department *Letter dated: June 13, 2018*	SLOPW	County Government Center, Room 206 San Luis Obispo, CA 93408 *Contact: Glenn Marshall, Development Services Division Manager*	8-5
San Luis Obispo County Air Pollution Control District *Letter dated: June 26, 2018*	SLOAPCD	3433 Roberto Court San Luis Obispo, CA 93401 *Contact: Melissa Guise, Air Quality Specialist*	8-7

STATE OF CALIFORNIA
GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH

EDMUND G. BROWN JR.
GOVERNOR

KEN ALEX
DIRECTOR

RECEIVED
JUL - 6 2018
COUNTY OF SAN LUIS OBISPO
DEPARTMENT OF PUBLIC WORKS

July 3, 2018

Keith Miller
San Luis Obispo County
976 Osos St, Room 206
San Luis Obispo, CA 93408

Subject: County Service Area 7 (Oak Shores) Wastewater Treatment Facility Upgrade Project
SCH#: 2017111024

Dear Keith Miller:

The State Clearinghouse submitted the above named Supplemental EIR to selected state agencies for review. The review period closed on July 2, 2018, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. **SCH-1**

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
1-916-322-2318 FAX 1-916-558-3184 www.opr.ca.gov

Document Details Report
State Clearinghouse Data Base

SCH#	**2017111024**
Project Title	County Service Area 7 (Oak Shores) Wastewater Treatment Facility Upgrade Project
Lead Agency	San Luis Obispo County
Type	**SIR** Supplemental EIR
Description	The County of San Luis Obispo Department of Public Works is proposing upgrades and improvements to the County Service Area No. 7A Wastewater Treatment Facility in the community of Oak Shores. The proposed improvements would include upgrades to the effluent disposal system (new lift station, force main pipeline, 10-acre storage pond, 15-acre spray field, and sludge drying beds) located within and surrounding the Oak Shores community. The proposed project would provide total wastewater service capacity for 1,197 parcels, including 583 currently served parcels, 329 parcels with existing commitments, and new commitments for an additional 285 parcels.

Lead Agency Contact

Name	Keith Miller		
Agency	San Luis Obispo County		
Phone	805-781-5714	***Fax***	
email			
Address	976 Osos St, Room 206		
City	San Luis Obispo	***State*** CA	***Zip*** 93408

Project Location

County	San Luis Obispo				
City					
Region					
Lat / Long	35° 45' 11.8" N / 120° 59' 5.5" W				
Cross Streets	Ridge Rider Rd, Oak Shores Dr, Lynch Canyon Rd, Interlake Rd				
Parcel No.	mult				
Township	25S	***Range*** 9E	***Section*** 15	***Base***	MDBM

Proximity to:

Highways	
Airports	
Railways	
Waterways	Nacimiento Reservoir, unnamed drainages
Schools	
Land Use	ag, public utilities, OS, residential singel fam

Project Issues	Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Vegetation; Wetland/Riparian; Growth Inducing; Landuse; Cumulative Effects
Reviewing Agencies	Resources Agency; Department of Conservation; Department of Fish and Wildlife, Region 4; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 5; Office of Emergency Services, California; Native American Heritage Commission; Department of Toxic Substances Control; Regional Water Quality Control Board, Region 3; State Water Resources Control Board, Division of Water Quality

Date Received 05/18/2018 ***Start of Review*** 05/18/2018 ***End of Review*** 07/02/2018

SCH-1 (cont'd)

8.1.1 Response to Letter from State Clearinghouse

Comment No.	Response
SCH-1	Letter acknowledging compliance with the State Clearinghouse review requirements for the Draft SEIR. The State Clearinghouse did not receive any comments from selected state agencies and no changes to the EIR are necessary.

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

REFERRAL

June 13, 2018

County of San Luis Obispo Public Works Department
c/o Keith Miller, Environmental Resource Specialist
979 Osos Street, Room 207
San Luis Obispo, CA 93408

Subject: Comments on the County Service Area 7 (Oak Shores) Wastewater Treatment Facility Upgrade Project Draft Supplemental Environmental Impact Report (DEIR)

Thank you for the opportunity to review the subject report. It has been reviewed for potential impacts associated with traffic, drainage, flood hazard, and stormwater quality by the County of San Luis Obispo – Department of Public Works – Development Services Division. The following summarizes our comments:

1. Project work proposed along Lynch Canyon Road must be constructed in accordance with County Public Improvement Standards. An encroachment permit issued by the Department of Public Works will be required prior to construction with the right-of-way. **SLOPW-1**
2. Improvements to the existing Oak Shores wastewater treatment facility are required by the conditions of approval for tentative tract 2162 prior to recordation of the final tract map for phases 2 through 6. If the improvements are not completed, or if the improvement plans not approved and bonded, the tentative map for tract 2162 phases 2-6 will expire. **SLOPW-2**

We have no further comments on the subject project. Please contact Glenn Marshall at 781-1596 if the Development Services Division may be of further assistance.

G:\Development_DEVSERV Projects\TM\Tract 2162 Oak Shores Lake Nacimiento Bu House LLC\Supplemental EIR\2018 DEIR Comments.docx

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

8.1.2 Response to Letter from County of San Luis Obispo Public Works Department

Comment No.	Response
SLOPW-1	All project work proposed along Lynch Canyon Road will be consistent with County Public Improvement Standards. Table 2-3 in Chapter 2, Project Description, of the SEIR has been revised to include this requirement and identify the need for an encroachment permit issued by the County Public Works Department in the list of agency permit requirements.
SLOPW-2	The required conditions of approval for Tract 2162 are noted and a reference has been added Section 2.1, Project Background, of the SEIR.

SLO COUNTY apcd | Air Pollution Control District
San Luis Obispo County

June 26, 2018

Mr. Keith Miller
SLO County Department of Public Works
County Government Center, Room 206
San Luis Obispo CA 93408

SUBJECT: APCD Comments Regarding the Oak Shore Waste Water Treatment Facility SEIR (201R11D598)

Dear Mr. Miller,

Thank you for including the San Luis Obispo County Air Pollution Control District (APCD) in the environmental review process. We have completed our review of the proposed project located at Oak Shores Village Area in Paso Robles. The proposed project is located within and adjacent to the Oak Shores Village Area, north of the Nacimiento Reservoir in the community of Oak Shores. The proposed improvements would be made within the existing Oak Shores wastewater treatment facility off Ridge Rider Road, at the location of the existing spray field and storage ponds adjacent to Oak Shores Drive, and at a new proposed disposal location called Gregg Ranch, located north of Lynch Canyon Road, approximately 0.25 miles west of Interlake Road. The proposed improvements would include upgrades to the wastewater treatment plant, sewage collection system, and effluent disposal system in and surrounding Oak Shores. Similar upgrades were previously proposed and analyzed in the FEIR for the County Service Area 7 (Oak Shores) Wastewater Treatment Plant Upgrades Project (Morro Group, Inc 2008). Changes to the design and location of the proposed effluent and sludge disposal system were subsequently proposed and the new and /or revised WWTF upgrades are being further analyzed in the SEIR.

The following are APCD comments that are pertinent to this project.

GENERAL COMMENTS
As a commenting agency in the California Environmental Quality Act (CEQA) review process for a project, the APCD assesses air pollution impacts from both the construction and operational phases of a project, with separate significant thresholds for each. **Please address the action items contained in this letter that are highlighted by bold and underlined text**.

Page 4.3-8
Page 4.3-8 indicated that portable equipment and engines 50 horse power or greater used during construction activities will require California statewide portable equipment registration or an APCD permit. **As indicated later in this letter, SLOAPCD recommends this requirement be added as a mitigation measure to the project**.

SLOAPCD-1

t 805.781.5912 f 805.781.1002 w slocleanair.org 3433 Roberto Court, San Luis Obispo, CA 93401

Environmental Impact Report for Oak Shore Waste Water Treatment Facility SEIR
June 26, 2018
Page 2 of 4

Page 4.3-11
On page 4.3-11 and in Appendix B, page 4, there is a brief description of the screening health risk assessment (HRA) which was completed for the project, however specific details for modeling were not provided. **Please provide documentation on the screening HRA including modeling assumptions, inputs and outputs.**

Likewise, for the CalEEMod analysis please provide the modeling runs in addition to the summary tables that were included in Appendix B.

SLOAPCD-2

Page 4.3-12
The SEIR indicates that the GHG would be less than the SLPOAPCD's threshold of 1,150 MTCO2e/yr. It should be noted that for a source like the waste water treatment plant, the SLOAPCD's GHG threshold of 10,000 MTCO2e/yr (see SLOAPCD CEQA Air Quality Handbook, page 3-6) should be used instead of 1,150 MTCO2e/yr.

SLOAPCD-3

Page 4.3-16
For mitigation measure AQmm1.1 b SLOAPCD recommend adding the following language for drought conditions.

Since water use is a concern due to drought conditions, the contractor or builder shall implement the use of an APCD-approved dust suppressant(s) to reduce the amount of water used for fugitive dust control. For a list of suppressants, see Section 4.3 of the CEQA Air Quality Handbook that can be accessed at the following website: slocleanair.org/business/landuseceqa.php.

SLOAPCD-4

Page 4.3-16
Impact to sensitive receptors is discussed in Section 4.3.5.2 of the SEIR. **SLOAPCD staff recommend in addition to the mitigation measures outlined in AQ/mm1.1 and AQ/mm1.2 the following measures be included for idling in areas where construction activities will be within 1,000 feet of residences as indicated on page 4.3-16.**

1. California Diesel Idling Regulations
   a. ***On-road diesel vehicles*** shall comply with Section 2485 of Title 13 of the California Code of Regulations. This regulation limits idling from diesel-fueled commercial motor vehicles with gross vehicular weight ratings of more than 10,000 pounds and licensed for operation on highways. It applies to California and non-California based vehicles. In general, the regulation specifies that drivers of said vehicles:
      1. Shall not idle the vehicle's primary diesel engine for greater than 5-minutes at any location, except as noted in Subsection (d) of the regulation; and,
      2. Shall not operate a diesel-fueled auxiliary power system (APS) to power a heater, air conditioner, or any ancillary equipment on that vehicle during sleeping or resting in a sleeper berth for greater than 5.0 minutes at any location when within 1,000 feet of a restricted area, except as noted in Subsection (d) of the regulation.

   b. ***Off-road diesel equipment*** shall comply with the 5-minute idling restriction identified in Section 2449(d)(2) of the California Air Resources Board's In-Use Off-Road Diesel regulation.

   c. Signs must be posted in the designated queuing areas and job sites to remind drivers and operators of the state's 5-minute idling limit.

SLOAPCD-5

Environmental Impact Report for Oak Shore Waste Water Treatment Facility SEIR
June 26, 2018
Page 3 of 4

d. The specific requirements and exceptions in the regulations can be reviewed at the following web sites: www.arb.ca.gov/msprog/truck-idling/factsheet.pdf and www.arb.ca.gov/regact/2007/ordiesl07/frooal.pdf.

AND

2. Diesel Idling Restrictions Near Sensitive Receptors
In addition to the state required diesel idling requirements, the project applicant shall comply with these more restrictive requirements to minimize impacts to nearby sensitive receptors:
   a. Staging and queuing areas shall not be located within 1,000 feet of sensitive receptors;
   b. Diesel idling within 1,000 feet of sensitive receptors shall not be permitted;
   c. Use of alternative fueled equipment is recommended; and
   d. Signs that specify the no idling areas must be posted and enforced at the site.

Truck Routing
Proposed truck routes should be evaluated and selected to ensure routing patterns have the least impact to residential dwellings and other sensitive receptors, such as schools, parks, day care centers, nursing homes, and hospitals. If the project has significant truck trips where hauling/truck trips are routine activity and operate in close proximity to sensitive receptors, toxic risk needs to be evaluated.

SLOAPCD-5 (cont'd)

In addition to the measures outline in the SEIR, SLOPACD recommends the following mitigation measures be included for the project.

Demolition/Asbestos
Demolition activities can have potential negative air quality impacts, including issues surrounding proper handling, abatement, and disposal of asbestos containing material (ACM). Asbestos containing materials could be encountered during the demolition or remodeling of existing structures or the disturbance, demolition, or relocation of above or below ground utility pipes/pipelines (e.g., transite pipes or insulation on pipes). **If this project will include any of these activities, then it may be subject to various regulatory jurisdictions, including the requirements stipulated in the National Emission Standard for Hazardous Air Pollutants (40CFR61, Subpart M - asbestos NESHAP).** These requirements include but are not limited to: 1) written notification, within at least 10 business days of activities commencing, to the APCD, 2) asbestos survey conducted by a Certified Asbestos Consultant, and, 3) applicable removal and disposal requirements of identified ACM. Please contact the APCD Engineering & Compliance Division at (805) 781-5912 or go to slocleanair.org/rules-regulations/asbestos.php for further information. To obtain a Notification of Demolition and Renovation form go to the "Other Forms" section of slocleanair.org/library/download-forms.php.

SLOAPCD-6

Developmental Burning
Effective February 25, 2000, **the APCD prohibited developmental burning of vegetative material within San Luis Obispo County.** If you have any questions regarding these requirements, contact the APCD Engineering & Compliance Division at (805) 781-5912.

Construction Permit Requirements
Based on the information provided, we are unsure of the types of equipment that may be present during the project's construction phase. Portable equipment, 50 horsepower (hp) or greater, used during construction activities may require California statewide portable equipment registration (issued by the California Air Resources Board) or an APCD permit.

The following list is provided as a guide to equipment and operations that may have permitting requirements but should not be viewed as exclusive. For a more detailed listing, refer to the Technical Appendices, page 4-4, in the APCD's 2012 CEQA Handbook.

- Power screens, conveyors, diesel engines, and/or crushers;
- Portable generators and equipment with engines that are 50 hp or greater;
- Electrical generation plants or the use of standby generator;
- Internal combustion engines;
- Rock and pavement crushing;
- Unconfined abrasive blasting operations;
- Tub grinders;
- Trommel screens; and,
- Portable plants (e.g. aggregate plant, asphalt batch plant, concrete batch plant, etc).

To minimize potential delays, prior to the start of the project, please contact the APCD Engineering & Compliance Division at (805) 781-5912 for specific information regarding permitting requirements.

SLOAPCD-6 (cont'd)

Odor Control Plan
Page 4.3-19
Mitigation Measure AQ/mm-2.1 discusses the requirement for an Odor Control Plan for the proposed facility modifications. Sludge drying beds can be a significant source of odors at a wastewater treatment plant and SLOAPCD recommends the Odor Control Plan includes a section on sludge handling procedures. Odors from sewage treatment plants are not allowed to create public nuisance under California law. If not addressed in the design phase, sludge drying and handling modifications after construction can add significant costs for the operator.

SLOAPCD-7

Operational Permit Requirements
The project applicant will be required to apply for a permit to make the proposed plant modifications. **To minimize potential delays, prior to the start of the project, please contact the APCD Engineering Division at (805) 781-5912 for specific information regarding permitting requirements.**

SLOAPCD-8

Again, thank you for the opportunity to comment on this proposal. If you have any questions or comments, feel free to contact me at (805) 781-4667.

Sincerely,

Melissa Guise
Air Quality Specialist

MAG/arr

cc: Tim Fuhs, Engineering & Compliance Division, APCD
Dora Drexler, Engineering & Compliance Supervisor, APCD

h:\plan\ceqa\project_review\4000\4000\4050-2\4050-2.docx

8.1.3 Response to Letter from San Luis Obispo County Air Pollution Control District

Comment No.	Response
SLOAPCD-1	Table 2-3 in Chapter 2, Project Description, of the SEIR has been revised to identify permit requirements from the CARB or SLOAPCD for equipment or engines 50 horsepower or greater in the list of agency permit requirements. Although already required by law, the requirement has also been added as a mitigation measure (AQ/mm-1.4).
SLOAPCD-2	Appendix B, Air Quality and Greenhouse Gas Emissions Background Information, of the SEIR has been revised to include detailed emissions modeling results for the Health Risk Assessment and CalEEMod model runs.
SLOAPCD-3	Section 4.3.5.1.2, Operation-Related Emissions, and Table 4.3-8 in Section 4.3, Air Quality and Greenhouse Gas Emissions, of the SEIR have been revised to compare project CO_2 emissions to the 10,000 $MTCO_2e$/year threshold.
SLOAPCD-4	Mitigation Measure AQ/mm-1.1 of the SEIR has been revised to include language including the use of an SLOAPCD-approved dust suppressant as a potential alternative to reduce the amount of water used for fugitive dust control during drought conditions.
SLOAPCD-5	Mitigation Measure AQ/mm-1.3 of the SEIR has been revised to reference existing requirements and implement mitigation measures for diesel idling within 1,000 feet of sensitive receptors to the greatest extent feasible.
SLOAPCD-6	The proposed project does not propose demolition of any structures or substantial work within paved areas. However, some utility placement in pavement and relocation of existing utility lines may be required. Therefore, Mitigation Measure AQ/mm-1.4 has been added to reference these requirements. The project does not propose any developmental burning. Construction permit requirements have been addressed in the SEIR (refer to response SLOAPCD-1 above).
SLOAPCD-7	Mitigation Measure AQ/mm-2.1 has been revised to require evaluation of sludge-handling procedures in the Odor Control Plan. The potential for sludge drying beds to be a substantial source of odor is noted and analyzed in Section 4.3.5.3, Creation of Objectionable Odors, in Section 4.3, Air Quality and Greenhouse Gas Emissions, of the SEIR and would be mitigated to less than significant through implementation of identified mitigation measures.
SLOAPCD-8	Table 2-3 in Chapter 2, Project Description, of the SEIR has been revised to identify the need for an operational permit from SLOAPCD for proposed plant modifications in the list of agency permit requirements.

This page intentionally left blank.

8.2 NON-AGENCY ORGANIZATION COMMENT LETTERS AND RESPONSES

The following non-agency organizations have submitted comments on the Draft EIR.

Respondent	Code	Contact Information	Page
Oak Shores Community Association *Letter dated: June 8, 2018*	OSCA	2727 Turkey Cove Road Bradley, CA 93426 *Contact: Steve Gasperson, General Manager*	8-13

Keith L. Miller

From: Steve Gasperson <sgasperson@oakshores.us>
Sent: Friday, June 8, 2018 2:23 PM
To: Keith L. Miller
Subject: RE: Notice of Availability Draft EIR for the County Service Area 7 (Oak Shores) Wastewater Treatment Facility Upgrade Project

Keith,

Just an FYI. Oak Shores Community Association has a total of 851 lots in which 639 are built on. Your report is showing I believe 583. Not sure its that important but wanted to up-date you. **OSCA-1**

Steve Gasperson
General Manager
Oak Shores Community Association
sgasperson@oakshores.us
Office # 805-472-2233
Fax # 805-472-2234
Cell # 916-806-4029
www.oakshores.us

To follow the Association on Facebook go to;
http://facebook.com/ TheOfficialOakShoresCommunityAssociation

From: Keith L. Miller <klmiller@co.slo.ca.us>
Sent: Monday, May 21, 2018 10:00 AM
To: Steve Gasperson <sgasperson@oakshores.us>
Cc: Jeremy Ghent <jghent@co.slo.ca.us>; Matthew Tallone <mtallone@co.slo.ca.us>
Subject: Notice of Availability Draft EIR for the County Service Area 7 (Oak Shores) Wastewater Treatment Facility Upgrade Project

Hi Steve,
This email is notification that the Draft Supplemental Environmental Impact Report (SEIR) for the County Service Area 7 (Oak Shores) Wastewater Treatment Facility Upgrade Project is now available for review. The Draft SEIR can be read and/or downloaded here:
https://www.slocounty.ca.gov/pw/oak-shores-wwtf-eir

Hardcopies and CDs are available if you would prefer. ***Please distribute this notification to the association.***

The Draft SEIR and its technical studies are available for the California Environmental Quality Act (CEQA) required 45-day public review and comment period from **May 18 through July 3, 2018**. Written comments on the Draft SEIR and technical studies must be received no later than 5:00 p.m. on July 3, 2018. Submit written comments to:

County of San Luis Obispo Department of Public Works
Keith Miller, Environmental Resource Specialist

1

976 Osos Street, #207 San Luis Obispo, CA 93408
Email: klmiller@co.slo.ca.us

If you have any questions about the Draft SEIR or the CEQA process, please do not hesitate to call or email me. Thank you.

Keith Miller
Environmental Resource Specialist
Public Works, County of San Luis Obispo
Tel: (805) 781- 5714 | *An APWA Accredited Agency*
Website | Twitter | Map

2

8.2.1 Response to Letter from Oak Shores Community Association

Comment No.	Response
OSCA-1	Section 2.1, Project Background, of Chapter 2, Project Description, of the SEIR has been revised to reflect the most recent information regarding developed parcels within Oak Shores.