4.12 ISSUES WITH LESS THAN SIGNIFICANT IMPACTS

The Initial Study and further environmental review through the EIR process evaluated the proposed project and determined that there were insignificant impacts to agricultural resources, population and housing, recreation, and wastewater. These issues are described in the following sections. This section is largely based on the Initial Study/Mitigated Negative Declaration prepared for the project (April 2012) which included the original analysis and conclusion that the project would result in less than significant impacts to these resource areas.

4.12.1 Agricultural Resources

4.12.1.1 Existing Conditions

Historic agricultural uses at the Dana Adobe included dry grain, raising cattle, and the production of hides and tallow. The project site does not currently support agricultural production and is not irrigated, though, at times, horses are grazed within the project site. No portion of the project site is in an agricultural preserve or under a Williamson Act contract. The soil types and characteristics of the project site are described in Section 4.5, Geology and Soils.

The 30-acre area of the project site is within the Recreation land use category, but onsite soils are classified as Prime Farmland if irrigated, Farmland of Statewide Importance, and Other Productive Soils by the County COSE's Table of Important Agricultural Soils of San Luis Obispo County. The 100-acre portion of the site is designated Agriculture, and its soils are classified as Prime Farmland if irrigated, Farmland of Statewide Importance, Other Productive Soils, and Highly Productive Rangeland Soils.

4.12.1.2 Regulatory Setting

<u>State Regulations and Policy</u>

California Land Conservation Act (Williamson Act)

As defined by the California Department of Conservation (CDC), 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, landowners receive lower property tax assessments based on agricultural or open space land uses, as opposed to the real estate value of the land. Local governments receive a subsidy for forgone property tax revenues from the state via the Open Space Subvention Act of 1971. However, as at the time this EIR was prepared, the State of California has at least temporarily suspended the subsidies to local government as a result of revenue shortfalls.

<u>Local Regulations and Policy</u>

Agriculture Element of the San Luis Obispo County General Plan (2010)

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 intent 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." Please refer to Chapter 3, Environmental Setting, for a discussion of Agricultural Element policies as they relate to this project.

San Luis Obispo County Right-to-Farm Ordinance

The San Luis Obispo County Right-to-Farm Ordinance (County Code Chapter 5.16) states that the use of real property for agricultural operations including agricultural processing is a high-priority and favored use. The ordinance states that: "it is the declared policy of this County to enhance and encourage agricultural operations, including agricultural processing within the County…[and] to provide to the residents of this County proper notification of the County's recognition and support through this ordinance of those persons' and/or entities' right to farm". The ordinance also states that: "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 nuisances 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.

4.12.1.3 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. Pursuant to the County's CEQA Initial Study Checklist, a substantial impact to agricultural resources would occur if the project would:

a. Convert prime agricultural land 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 or Williamson Act program.

4.12.1.4 Impact Assessment and Methodology

Impacts to agricultural resources were assessed by utilizing data and maps published by the U.S. Department of Agriculture, CDC, and County Agriculture Department, including soil information, farmland mapping, and historical and current agricultural uses at the project site. The project was analyzed for the potential conversion of Farmland, loss of productive agricultural soils, incompatible land uses, and inconsistencies with regulations and policies intended to preserve agricultural resources.

The analysis of agricultural constraints included a review of GIS maps, local and state literature and records, consultation with the County Agriculture Department and the County Department of Planning and Building, and field visits to the project area and the surrounding region. GIS data provided by the County were utilized to determine soil types and identify parcels within and adjacent to the project study area. These layers were joined with the project study area layer to quantify the acreage of affected soils and agricultural use areas.

Documents used for the literature review included the County of San Luis Obispo Annual Report, the County of San Luis Obispo General Plan Agriculture Element, and the South County

Inland Area Plan. Other documents included the NRCS Soils Data for San Luis Obispo County, CEQA Guidelines, California Farmland Conversion Report published by the CDC, and online resources, mapping, and data on the USDA website. Field visits were performed to assess existing land uses and potential constraints.

4.12.1.5 Project Specific Impacts and Mitigation Measures

The proposed project was reviewed by the County Agriculture Department (2012). The Agriculture Department noted that the project would have less than significant impacts to agricultural resources or operations. The Agriculture Department recommended conditions to maximize the availability of water for agricultural production, minimize runoff, and maximize groundwater recharge. The project does not include any turf areas, and drip-irrigated landscaping would be native and drought-tolerant. The project includes pervious surfaces for paths and overflow parking areas, and construction of a rain garden. In addition, the applicant is required to comply with Interim LID guidelines (refer to Section 4.5, Geology and Soils). Therefore, the project is consistent with the Agriculture Department's recommendations as proposed and in compliance with recommended mitigation measures.

Land Use Ordinance Amendment

The proposed LUO amendment would not result in a significant impact to water available for agricultural use, because the calculated water demand for the project would not exceed the amount that would be required if the site was developed for residential use, and the proposed water source would be the NCSD. The 100-acre area, and agricultural uses outside the NCSD service boundary, would continue to use onsite wells for water supply. Other proposed LUO changes are only applicable to the Recreation portion of the project site, and would not result in adverse impacts to surrounding agricultural uses. Therefore, potential impacts to agriculture would be *less than significant (Class III)*. No additional planning area standards are necessary.

Conditional Use Permit

Convert Prime Agricultural Land / Prime Farmland

The existing Dana Adobe and proposed uses would be located within the 30-acre area west of Nipomo Creek on Oceano Sand (0 to 9 and 9-30 percent slopes), and within areas designated as Farmland of Statewide Importance. Uses east of Nipomo Creek (within the 100-acre area), and within areas designated as Prime Farmland if irrigated and Farmland of Statewide Importance, would include rough-graded trails and the emergency access road extending to Thompson Avenue. Based on the location and nature of proposed uses, these agricultural resource impacts are considered *less than significant (Class III)* and no mitigation is necessary.

Impairment of Agricultural Uses or Result in Conversion

Implementation of the project would not convert prime agricultural land to non-agricultural uses. Master Plan development would occur within lands considered Farmland of Statewide Importance; however, these areas are not currently used for production agriculture. The 100 acres of land east of Nipomo Creek are not irrigated, and historically supported cattle grazing and dry farming. The development of trails and the creation of an emergency access road would not hinder grazing and other potential agricultural activities in the future. Within the 30-acre area, proposed uses include education about the historical and modern agricultural uses at the project site and the Nipomo Rancho, including the historic tallow vat, an equestrian arena, recreated barn, and interpretive gardens, orchard, and vineyard. Lands east of Nipomo Creek would support open space and agricultural uses, including crop production and livestock grazing

outside of County and Land Conservancy of San Luis Obispo County restoration areas. Based on the location and nature of proposed uses, these agricultural resource impacts are considered *less than significant (Class III)* and no mitigation is necessary.

Conflict with Existing Zoning or Williamson Act Program

The proposed uses are consistent with the land use category of applicable parcels, and would not result in any land use conflicts. Special events would be limited to the property west of Nipomo Creek, within the Recreation land use category. No portion of the project site is under a Williamson Act contract; however, parcels to the northwest, northeast, and southeast of the 100-acre area are under Williamson Act contract. These parcels are located approximately 300 feet southeast of the emergency access drive, and 300 feet northwest and 500 feet west of existing ranch roads (to be used as public trails). The Holloway Christmas Tree Farm is located approximately 0.2 mile to the northwest of the Dana Adobe, on South Oakglen Avenue. Implementation of the project would not include any uses directly adjacent to agricultural lands, and would not include any activities that would impair agricultural uses in the area. Based on the location and nature of proposed uses, these agricultural resource impacts are considered *less than significant (Class III)* and no mitigation is necessary.

4.12.1.6 Cumulative Impacts

A majority of the projects recently constructed, approved, or under consideration by the County are located within the Nipomo urban area, and would not result in significant impacts to agricultural resources. The Laetitia Agricultural Cluster Tentative Tract Map and CUP would result in the conversion of Farmland if approved as proposed. The proposed project would not result in significant impacts to agricultural resources, and would locate development within the smaller (30-acre) portion of the site while keeping the remainder (100 acres) in open space. Based on the design of the project, potential cumulative impacts to agricultural resources would be *less than significant (Class III)*.

4.12.2 Population and Housing

4.12.2.1 Existing Conditions

The proposed project is located within the boundaries of San Luis Obispo County, and also extends partly into the community of Nipomo URL. The community of Nipomo is located within the South County Inland planning area, which has historically experienced significant growth compared to other planning areas and the county overall. The area which has experienced, and continues to experience, the highest growth rate in South County is Nipomo, which experienced tremendous growth from 1990 to 2008.

There are no major topographical features affecting the extent and density of development in South County; therefore, the major determining factor of urban development is the availability and feasibility of community services, including water supply, sewage disposal, and transportation improvements. The build-out potential for the Nipomo urban area is 24,032 people. Nipomo has been targeted in the South County Inland Area Plan as being developed as the economic, cultural, and residential center of the South County planning area. However, the dramatic growth in this area is placing strains on infrastructure, including water availability, roads, and schools. Due to the relative affordability of Nipomo, a large workforce population resides there and commutes to work in nearby communities.

In its efforts to provide for affordable housing, the county currently administers the Home Investment Partnerships (HOME) Program and the Community Development Block Grant

(CDBG) Program, which provides limited financing to projects relating to affordable housing throughout the county. The County's Inclusionary Housing Ordinance requires provision of new affordable housing in conjunction with both residential and nonresidential development and subdivisions.

4.12.2.2 Regulatory Setting

The California State Planning and Zoning Law requires that every city and county general plan must contain the following components or "elements:" Land Use, Conservation, Noise, Circulation, Open Space, Safety, and Housing. The County most recently adopted an updated Housing Element in August 2009 to cover the planning period from 2009 through 2014. The primary purpose of the Housing Element is to facilitate the provision of needed housing in the context of the Land Use Element and the County General Plan and related ordinances. Its secondary purpose is to meet the requirements of state law and achieve certification by the California Department of Housing and Community Development, which allows the County to qualify for certain funding programs offered by the state. Housing is the only element subject to approval by the state and the only element that must be updated on a specific timeline, generally every 5 years.

4.12.2.3 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. Pursuant to the County's CEQA Initial Study Checklist, a substantial impact to population and housing would occur if the project would:

a. Induce substantial population growth in an area, either or indirectly (e.g., through projects in an undeveloped area or extension of major infrastructure);

b. Displace existing housing or people, requiring construction of replacement housing elsewhere; or,

c. Create the need for substantial new housing in the area.

4.12.2.4 Impact Assessment and Methodology

This evaluation of population and housing impacts associated with the proposed project was based on current population projections and statistics and review of the County General Plan. The focus of the population and housing analysis is potential impacts resulting from implementation of the project.

4.12.2.5 Project Specific Impacts and Mitigation Measures

<u>Land Use Ordinance Amendment</u>

The proposed LUO amendments do not include language that would result in an adverse effect related to population and housing, and would result in the need for additional housing, or displace existing housing. The proposed amendment would not result in intensification of land use or remove a barrier to growth. The proposed amendment includes an update to language regarding the Southland Street interchange (§22.112.080.G.1). The language is clarified to delete the reference to this interchange project because it is no longer proposed by County Public Works and Caltrans, and replaces it with a requirement for emergency access. This change meets the intent of the original measure by providing emergency access to and from the

project site, and would not induce substantial growth in the area. No additional planning area standards are necessary.

Conditional Use Permit

Induce Substantial Growth

The proposed project would include the construction of an emergency access road to provide emergency egress from the site in the event that South Oakglen Avenue is impeded by hazardous conditions. This road would not be used as secondary or primary access for the project site, or surrounding uses, and would not induce growth in the area. Potential impacts would be *less than significant (Class III)*.

Displace Existing Housing

The proposed project would not result in the displacement of existing housing. No impact would occur.

Create the Need for Substantial New Housing

The project would create an educational and cultural learning facility, which would bring local and regional visitors to the area. However, the project is not expected to result in any permanent population growth in the area. The project includes development of emergency access, but would not result in any major extension of infrastructure. Therefore, the project will not result in a need for a significant amount of new housing, and potential impacts would be *less than significant (Class III)*.

4.12.2.6 Cumulative Impacts

The project would not create significant impacts on existing housing or population levels. The proposed uses are consistent with the County General Plan and land use designation. Therefore, no cumulatively significant impact would occur.

4.12.3 Recreation

4.12.3.1 Existing Conditions

The San Luis Obispo County Parks Division, and various other federal and state agencies, provide recreational facilities throughout the County. These recreational properties include urban or rural regional parks, neighborhood or community parks, special places, golf courses, and trails. Several recreational opportunities are provided in the community of Nipomo, including the 144-acre Nipomo Community Park, Mesa Meadows natural area, and Black Lake and Cypress Ridge Golf Courses.

The County's Parks and Recreation Element includes the Nipomo Creek Linear Park as a proposed County park in the South County Nipomo area. The Parks and Recreation Element directs the County to "Obtain acreage for a linear park in the vicinity of Nipomo Creek. The linear park should contain a Class I bicycle path/trail system as well as other recreational facilities. Once property has been obtained, prepare a master plan for the park to determine appropriate park facilities and future maintenance needs. Update the master plan periodically to reflect community recreation needs."

The Parks and Recreation Element map shows the proposed Nipomo Creek Linear Park extending from the US 101/Thompson Avenue interchange, through the project site on the

western side of Nipomo Creek, and reconnecting with Thompson Avenue to the south. While the linear park is proposed in the General Plan, the County is not currently pursuing or planning for its development. While the proposed project does not include a Class I bicycle path, a trail system is proposed throughout the project site, which could be incorporated into a master plan for the linear park in the event the County elects to pursue it.

4.12.3.2 Regulatory Setting

The Parks and Recreation Element of the County General Plan identifies the goals, objectives, policies, and programs related to the provision of parks, trails, beach access, golf courses, and natural areas countywide. The Parks and Recreation Element was updated and adopted on December 19, 2006. 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, including those resources that are outside of the County's management, and 3) facilitate the evaluation of park and recreation needs during the land use decision process. 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 assure an equitable distribution of parks throughout the county.

The National Recreation and Parks Association standards are used for determining recreational needs. The standards are designed to help planners adequately estimate the amount of recreational acreage that is needed for the population in a given area. The standards are expressed in terms of acres of parkland per 1,000 residents, and include approximately 1 to 2 acres of neighborhood parks, 5 to 8 acres of community parks, and 5 to 10 acres of regional parks for every 1,000 people.

In addition, many jurisdictions, including federal, state, county, and municipal governments, are involved in planning, developing, and operating public trails within San Luis Obispo County. Federal and state governments have adopted legislation to protect existing trails and to provide new trails and related facilities. The National Trails System Act of 1968 plans a nationwide system of interstate riding and hiking trails. At the state level, the Department of Parks and Recreation has prepared the California Recreational Trails System Plan. At the local level, the County has developed the County Trails Plan to ensure coordination with state and federal plans.

4.12.3.3 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. Pursuant to the County's CEQA Initial Study Checklist, a substantial impact to recreational resources would occur if the project would:

a. Increase the use or demand for parks or other recreation opportunities; or,
b. Affect the access to trails, parks or other recreation opportunities.

4.12.3.4 Impact Assessment and Methodology

The impacts of the proposed project were evaluated based on an assessment of the construction of various components of the Stories of the Rancho Era Master Plan, and the associated impacts on existing recreational facilities, in conjunction with the private facilities proposed by the applicant.

4.12.3.5 Project Specific Impacts and Mitigation Measures

Land Use Ordinance Amendment

The proposed LUO amendments would clarify language applicable to the Recreation land use category, specific to the project site (LUO §22.112.080.G). The proposed changes clarify the Master Plan and permit process for the site, and clarify development requirements to maintain the historical context of the Dana Adobe, which would result in a beneficial effect by preserving a historical and educational resource for the public. These amendments would not affect recreational resources on-site or in the community, because they would not generate additional demand for recreational opportunities or affect an existing recreational resource. No additional planning area standards are necessary.

Conditional Use Permit

Increase Demand for Parks and Recreational Opportunities

The project would result in beneficial recreational impacts by protecting and enhancing an educational and historical resource open to the public. The project would also provide additional future recreational opportunities including hiking, wildlife viewing, picnicking, equestrian use, and enjoyment of open space. Therefore, potential impacts to recreational resources would be *beneficial (Class IV)*.

Affect Access to Trails, Parks, or Other Recreational Opportunities

Implementation of the project would improve access to trails and recreational opportunities onsite. The project would not impede future development of the Nipomo Creek Linear Park and associated Class I bicycle path. Therefore, potential impacts to recreational resources would be *beneficial (Class IV)*.

4.12.3.6 Cumulative Impacts

Implementation of the proposed project would result in a *beneficial (Class IV)* impact to recreational resources, because it would improve recreational opportunities within the community of Nipomo and the South County Area.

4.12.4 Wastewater

4.12.4.1 Existing Conditions

The project site is currently served by an on-site septic system. Development of the proposed visitor's center would include construction of a public restroom facility, on-site septic tank, sewer lift station, and leachfield.

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

- Sufficient land area (refer to County's LUO or Plumbing Code) – depending on water source, parcel size minimums will range from 1 to 2.5 acres;
- The soil's ability to percolate or "filter" effluent before reaching groundwater supplies (30 to 120 minutes per inch is ideal);

- The soil's depth (there needs to be adequate separation from bottom of leach line to bedrock [at least 10 feet] or high groundwater [5 to 50 feet depending on percolation rates]);
- The soil's slope on which the system is placed (surface areas too steep creates potential for daylighting of effluent);
- Potential for surface flooding (e.g., within 100-year flood hazard area);
- Distance from existing or proposed wells (between 100 and 250 feet depending on circumstances); and,
- Distance from creeks and water bodies (100-foot minimum).

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

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

The soil types for the project area were determined based on the NRCS Soil Survey map and are provided in Section 4.5, Geology and Soils. The main limitation of on-site soils for wastewater effluent is poor filtering characteristics due to the very permeable nature of the soil. Often, these soil types will require special engineering and larger separations between the leach lines and the groundwater basin to provide adequate filtering of the effluent.

The Basin Plan identifies the percolation rate should be between 30 and 120 minutes per inch. In this case, the *Percolation Testing Report* prepared for the project (GeoSolutions 2011a) identified percolation rates for the soil ranges from 1 to 10 minutes per inch (average 7 minutes per inch) for all leach line locations. Groundwater was not encountered in the 15 feet below ground surface exploratory boring.

4.12.4.2 Regulatory Setting

Regulations and guidelines on proper wastewater system design and criteria are found within the County's Plumbing Code (see Chapter 7 of the Building and Construction Ordinance [Title 19]), the RWQCB's "Water Quality Control Plan, Central Coast Basin" (hereafter referred to as the "Basin Plan"), and the California Plumbing Code. These regulations include specific requirements for both on-site and community wastewater systems. These regulations are applied to all new wastewater systems.

The Basin Plan includes various guidelines, criteria, and prohibitions for on-site wastewater treatment and disposal. On-site wastewater systems may be used to treat and dispose of wastewater, provided the daily flow rate is less than 2,500 gallons.

Standards for the quality of treated effluent are established by federal and state water quality laws. Effluent is required to be treated in accordance with the applicable standards set forth in CCR Title 22 (Environmental Health) as well as standards set by the SWRCB, which sets specific effluent discharge requirements for wastewater facilities in the county. Standards for quality of treated effluent are set to protect present and potential beneficial uses of surface and/or groundwater that receive the treated effluent, including recreation, agriculture, and wildlife. Use of treated effluent as recycled water is also regulated by CCR Title 22 (Chapter 3, Recycling Criteria).

The County Environmental Health Services and the Central Coast RWQCB are the local agencies responsible for effluent treatment standards and siting of wastewater treatment and disposal facilities. These agencies ensure that proposed projects conform to all applicable local standards, including the Basin Plan. Compliance with County regulations, such as the Building and Construction Ordinance sections relating to private sewage disposal systems, would also be required.

4.12.4.3 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. Pursuant to the County's CEQA Initial Study Checklist, a substantial impact to wastewater would occur if the project would:

a. Violate waste discharge requirements or Central Coast Basin Plan criteria for wastewater systems;

b. Change the quality of surface or ground water (e.g., nitrogen-loading, day-lighting); or

c. Adversely affect a community wastewater service provider.

4.12.4.4 Impact Assessment and Methodology

The wastewater impacts of the proposed project were evaluated based on an assessment of on-site soil conditions and the site's suitability for the proposed septic system and leachfield.

4.12.4.5 Project Specific Impacts and Mitigation Measures

<u>Land Use Ordinance Amendment</u>

The proposed LUO amendments do not include language that would result in an adverse effect related to wastewater. Any future development of wastewater treatment and disposal facilities requires compliance with the LUO and the Basin Plan and review by the County Planning and Building Department. No additional planning area standards are necessary.

<u>Conditional Use Permit</u>

Violate Waste Discharge Requirements or Basin Plan Criteria

The proposed project includes the construction of on-site septic systems, which require review by the County Planning and Building Department and consistency with the Central Coast Basin

Plan. Based on the results of the *Engineering Geology Report* (GeoSolutions 2011b) and *Percolation Testing Report* (GeoSolutions 2011a), percolation rates average about 7 minutes per inch, and groundwater was encountered at a depth of 30 feet bgs. The project includes construction of vertical gravel pits, which may be constructed to a depth of 25 feet below the surface. This option was proposed by the applicant in the event of significant cultural resource discovery as a means to avoid or minimize adverse effects. The vertical system was evaluated by GeoSolutions (*Review of Proposed Visitor Center Building*, 2012). While the standard horizontal system was noted as the preferred option, GeoSolutions also stated that vertical pits could be constructed. Depth of the vertical system would be limited by the depth to groundwater and the presence of underlying clay soils, in order to achieve an adequate separation consistent with County Code and the Basin Plan (at least 10 feet) to protect groundwater quality.

In the event further investigation by the applicant's engineer and the County Building Department determines that a vertical system would not meet local and state regulations including separation between the system and groundwater, standard or engineered horizontal systems may be constructed. Based on the analysis of archaeological resources, including an assessment of the overall area of disturbance within the subsurface layer of archaeological resources, potential impacts would be similar, and would require mitigation to reduce adverse effects to a less than significant level (refer to Section 4.4 Cultural Resources, CR Impact 1 and CR/mm-1 through CR/mm-6).

The proposed systems meet other criteria identified in the Basin Plan and Plumbing Code. The project site has sufficient land area per the County's LUO to support an on-site system. The site's slope is less than 20%, and the systems would be located outside of the 100-year flood zone and more than 100 feet from on-site creeks and water bodies. There would be adequate distance between the proposed leach lines and existing or proposed wells.

Based on the above discussion and information provided, the site appears to be able to support an on-site system that will meet County Plumbing Code/Basin Plan requirements. Due to the fast percolation rate and depth to groundwater, the system would need to be engineered to address these conditions. Prior to building permit issuance and/or final inspection of the wastewater system, the applicant is required to show the compliance with the County Plumbing Code/Central Coast Basin Plan, including any above-discussed information relating to potential constraints. Therefore, based on the project being able to comply with these regulations, potential impacts are considered *less than significant (Class III)*.

Change the Quality of Surface or Groundwater

Please refer to discussion above. Based on review by the applicant's engineer and compliance with existing regulations, potential impacts would be *less than significant (Class III)*.

Adversely Affect Community Wastewater Service Provider

The proposed project includes onsite treatment of wastewater and would not affect the community wastewater service provider (NCSD).

4.12.4.6 Cumulative Impacts

Implementation of the proposed project would not result in a cumulatively considerable impact related to on-site wastewater treatment and disposal, or to the NCSD's sewer system. Potential cumulative impacts would be *less than significant (Class III)*.

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