4.4 ISSUE AREAS WITH LESS THAN SIGNIFICANT IMPACTS

The Initial Study and further environmental review through the EIR process have evaluated the proposed project and determined that the project would result in less than significant impacts to the following resource areas: agricultural resources, biological resources, hazards and hazardous materials, noise, population and housing, public services and utilities, recreation, transportation/circulation, wastewater, water, and land use. These issues are briefly described in the following sections, limited mitigation is recommended, and an explanation as to why impacts were determined to be less than significant after mitigation (if any) for the given resource is provided.

4.4.1 Agricultural Resources

4.4.1.1 Existing Conditions

San Luis Obispo County was the 18th largest agriculture producing county in California in 2010 (down from 16th in 2009) (California Department of Food and Agriculture 2011). The leading commodities included wine grapes, strawberries, broccoli, cattle and calves, and vegetables. According to the County's 2011 Crop Report, overall crop values increased to $739,208,000 in 2011, representing a 3% increase compared to 2010. Strawberries produced in the county in 2011 constituted 24% of San Luis Obispo County's total agricultural value, at $179,012,000 (County Department of Agriculture 2012). Wine grape production declined due to freezing temperatures experienced in April 2011, which reduced countywide yields by 34% compared to 2010. The gross value of wine grapes was $129,738,000, down 25% from 2010. The animal industry experienced an increase in overall value, coming in at $71,479,000, including a cattle value of $66,825,000.

While adjacent to agricultural and grazing lands, the community of Cayucos is entirely non-agricultural, with no lands within the urban reserve line boundaries designated for agricultural use. There are no agricultural activities occurring on the proposed project site or in the vicinity. The closest parcel subject to a Williamson Act contract is located approximately 1.3 miles east/northeast of the project site. The project site is designated RSF and is one of the last undeveloped residential parcels located along Studio Drive. Onsite soils consist of Beaches and Cropley clay (2-9% slopes), a deep, moderately well drained, and gently to moderately sloping soil formed in alluvium weathered from sedimentary rocks (USDA Natural Resources Conservation Service [NRCS] 2011). While Cropley clay is considered an Important Agricultural Soil of San Luis Obispo County (Prime Farmland and Highly Productive Rangeland Soil) (County of San Luis Obispo 2010a), the site is located within a residential neighborhood adjacent to a public beach area, with limited opportunity for production agriculture.

4.4.1.2 Regulatory Setting

Several state laws and regional plans have been enacted to support agricultural production and conservation of agricultural resources and lands, including the California Land Conservation Act (Williamson Act) and County Agriculture Element. These regulations are not directly applicable to the proposed project because no agricultural lands or Williamson Act lands are present onsite or in the project vicinity and because the project location is not well suited/situated to support future agricultural activities.

4.4.1.3 Thresholds of Significance

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

- Convert prime agricultural land to non-agricultural use;
- Impair agricultural use of other property or result in conversion to other uses;
- Conflict with existing zoning or Williamson Act program.

4.4.1.4 Impact Assessment and Methodology

Impacts to agricultural resources were assessed by utilizing data and maps published by the USDA, NRCS, California Department of Conservation (DOC), and County Agriculture Department, including soil information, farmland mapping, and economic data. The project was analyzed for potential conversion of important farmland, loss of productive agricultural soils, incompatible land uses, and inconsistencies with regulations and policies intended to preserve agricultural resources.

4.4.1.5 Project-specific Impacts and Mitigation Measures

Convert Prime Agricultural Land to Non-Agricultural Use

The project is located in a non-agricultural area with no agricultural activities occurring at or adjacent to the project site. The project site is classified as Urban and Built-Up Land by the DOC, Division of Land Resource Protection's Farmland Monitoring and Mapping Program (DOC 2008). No important farmland would be converted to non-agricultural use; therefore, there would be no impact.

Impair Agricultural Use of Other Property or Result in Conversion to Other Uses

No agricultural uses occur in the immediate vicinity of the project site. Based on the location of the project, it would not impair agricultural use of other properties in the region or result in conversion to non-agricultural uses. Therefore, there would be no impact.

Conflict with Existing Zoning or Williamson Act Program

The project site is within the residential land use category, and is not under Williamson Act contract. No parcels in the project vicinity are within the agricultural land use category or are subject to a Williamson Act contracts. No significant impacts to agricultural resources would to occur.

4.4.1.6 Cumulative Impacts

The project is located within an urban area and would not affect agricultural resources in the vicinity. Therefore, it would not cumulatively contribute to any impacts on county agricultural resources.

4.4.2 Air Quality and Climate Change

4.4.2.1 Existing Conditions

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. Approximately 75% of the County population and a corresponding portion of the commercial and industrial facilities are located within the Coastal Plateau. Due to higher population density and closer spacing of urban areas, emissions of air pollutants per unit area are generally higher in this region than in other regions of the County. The project location is located within the Coastal Plateau.

The County's air quality is measured by multiple ambient air quality monitoring stations: four SLOAPCD-operated permanent stations, two state-operated permanent stations, two special stations, and one station operated by Tosco Oil Refinery for monitoring sulfur dioxide (SO_2) emissions. The significance of a given pollutant can be evaluated by comparing its atmospheric concentration to state and federal air quality standards, which are presented in Table 4.4-1, below. These standards represent allowable atmospheric contaminant concentrations at which the public health and welfare are protected, and include a factor of safety. In San Luis Obispo County, ozone and PM_{10} (respirable particulate matter) are the pollutants of main concern, since exceedances of state health-based standards for those pollutants are experienced here in most years. For this reason, the county has been designated as a non-attainment area for the state ozone and PM_{10} standards (SLOAPCD 2010). The county is in attainment for all other standards.

Table 4.4-1. Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards[1]	Federal Standards[2]	
		Concentration[3]	Primary[3,4]	Secondary[3,5]
Ozone (O_3)	1 Hour	0.09 ppm (180 µg/m³)	-----	Same as Primary Standard
	8 Hour	0.07 ppm (137 µg/m³)	0.075 ppm (147 µg/m³)	
Fine Particulate Matter ($PM_{2.5}$)	24 Hour	No California Standards	65 µg/m³	Same as Primary Standard
	Annual arithmetic mean	12 µg/m³	35 µg/m³	
Respirable Particulate Matter (PM_{10})	24 Hour	50 µg/m³	150 µg/m³	
	Annual arithmetic mean	20 µg/m³	-----	
Carbon Monoxide (CO)	8 Hour	9.0 ppm (10 mg/m³)	9 ppm (10 mg/m³)	-----
	1 Hour	20 ppm (23 mg/m³)	35 ppm (40 mg/m³)	
Nitrogen Dioxide (NO_2)	Annual arithmetic mean	0.030 ppm (57 µg/m³)	53 ppm (100 µg/m³) [6]	Same as Primary Standard
	1 Hour	0.18 ppm (339 µg/m³)	100 ppm (188 µg/m³) [6]	-----
Lead[8]	30 day average	1.5 µg/m³	-----	-----
	Calendar quarter	-----	1.5 µg/m³	Same as Primary Standard
	Rolling 3-Month Average[9]	-----	.15 µg/m³	
Sulfur Dioxide (SO_2)	24 Hour	0.04 ppm (105 µg/m³)	-----	-----
	3 Hour	-----	-----	0.5 ppm (1300 µg/m³) [7]
	1 Hour	0.25 ppm (655 µg/m³)	75 ppb (196 µg/m³) [7]	-----

Pollutant	Averaging Time	California Standards[1]	Federal Standards[2]	
		Concentration[3]	Primary[3,4]	Secondary[3,5]
Visibility Reducing Particles	8 Hour	Extinction coefficient of 0.23 per kilometer – visibility of 10 miles or more (0.07 – 30 miles or more for Lake Tahoe) due to particles when relative humidity is less than 70%.	No Federal Standards	
Sulfates	24 Hour	25 μg/m^3		
Hydrogen Sulfide	1 Hour	0.03 ppm (42 μg/m^3)		
Vinyl Chloride[8]	24 Hour	0.01 ppm (26 μg/m^3)		

Notes: for additional information on Notes, please refer to the website: http://www.arb.ca.gov/research/aaqs/aaqs2.pdf

Source: California Air Resources Board 2010.

Greenhouse Gas Emissions and Climate Change

Climate change refers to any significant change in measures of climate such as temperature, precipitation, or wind, lasting for decades or longer (EPA 2007). Climate change may result from:

- Natural factors, such as changes in the sun's intensity or slow changes in the Earth's orbit around the sun;
- Natural processes within the climate system (e.g., changes in ocean circulation); or,
- Human activities that change the atmosphere's composition (e.g., through burning fossil fuels) and the land surface (e.g., deforestation, reforestation, urbanization, desertification, etc.).

Human activities, such as fossil fuel combustion and land use changes release carbon dioxide (CO_2) and other compounds, cumulatively termed GHG emissions. GHGs are effective in trapping infra-red radiation which otherwise would have escaped the atmosphere, thereby warming the atmosphere, the oceans, and earth's surface (EPA 2007).

GHGs are any gas that absorbs infrared radiation in the atmosphere (EPA 2007). GHGs, as defined in Assembly Bill 32 (AB 32), include the following gases: CO_2, methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). A brief summary of each GHG is summarized below (EPA 2007).

A series of reports issued by the United Nations Intergovernmental Panel on Climate Change (UNIPCC) have synthesized recent scientific studies of climate change (UNIPCC 2007a, 2007b, 2000c). Key findings of these reports include the following:

- Global atmospheric concentrations of CO_2, CH_4, and N_2O have increased markedly as a result of human activities since 1750, and now are at about double pre-industrial levels. Global increases in CO_2 concentration are due primarily to fossil fuel use and land use change, and global increases in CH_4 and N_2O are due primarily to agriculture.
- Warming of the global climate due to GHGs is unequivocal, as evidenced by increases in air and water temperatures, widespread melting of snow and ice, and rising global average sea level. Most of the increase in global average temperatures since the mid-

20th century is very likely due to increases in GHGs from human activities. GHG emissions increased 70% between 1970 and 2004.

- Numerous long-term climate changes observed have included changes in arctic temperatures and ice, precipitation, ocean salinity, wind pattern, and the frequency of extreme weather events such as droughts, heavy precipitation, heat waves, and tropical cyclone intensity.

- Continued GHG emissions at current rates would cause further warming and climate change during the 21st century that would very likely be larger than that observed in the 20th century.

- Climate change is expected to have adverse impacts on water resources, ecosystems, food and forest products, coastal systems and low-lying areas, urban areas, and public health. These impacts will vary regionally, and may be very expensive for agriculture and human activities. In some areas sea level rise may completely inundate now inhabited areas (e.g., river deltas, Pacific Islands).

In California, the main sources of GHG emissions are from the transportation and energy sectors. According to the California Air Resources Board (CARB) draft GHG emission inventory for the year 2004, 39% of GHG emissions result from transportation and 25% of GHG emissions result from electricity generation. California produced 497 million metric tons of CO_2 equivalent ($MMtCO_2e$) in 2004 (CARB 2007). California produces about 2% of the world's GHG emissions, with about 0.55% of the population.

The potential effects of future climate change on California resources include:

- Air temperature: Increases of 3 to 10.4 degrees Fahrenheit (ºF) by the end of the century, depending on aggressiveness of GHG emissions mitigation.

- Sea level rise: 6 to 30 inches by the end of the century, depending on aggressiveness of GHG emissions mitigation.

- Water resources: Reduced Sierra snowpack, reduced water supplies, increased water demands, changed flood hydrology.

- Forests: Changed forest composition, geographic range, and forest health and productivity; increased destructive wild fires.

- Ecosystems: Changed habitats, increased threats to certain endangered species.

- Agriculture: Changed crop yields, increased irrigation demands, increased impacts from tropospheric ozone.

- Public health: Increased smog and commensurate respiratory illness and weather-related mortality (California Climate Change Portal [CCCP] 2007).

4.4.2.2 Regulatory Setting

Federal Policies and Regulations

Air quality protection at the national level is provided through the Federal Clean Air Act (Federal CAA) and subsequent Federal CAA Amendments. The current version was signed into law on November 15, 1990. These amendments represent the fifth major effort by the U.S. Congress to improve air quality. The 1990 Federal CAA standards are generally less stringent than the California Clean Air Act (California CAA). However, unlike the California law, the Federal CAA set statutory deadlines for attaining federal standards. The 1990 Federal CAA 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.

State Policies and Regulations

The California CAA was signed into law in September of 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 CAA standards; thus, emission controls to comply with the State law will generally be sufficient to comply with the Federal standards as well. The California CAA 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 has adopted the CAP for San Luis Obispo County, which undergoes subsequent updates as required.

The California Global Warming Solutions Act of 2006 (AB 32, Health and Safety Code §38500 et seq.) requires the 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). The following summarizes the process and schedule for implementing AB 32:

- June 30, 2007: CARB publishes a list of discrete early action GHG emission reduction measures that can be implemented prior to the measures and limits to be adopted to meet the 2020 limit.
- September 7, 2007: CARB released a list of additional early action measures and discrete early actions.
- January 1, 2008: CARB determines what the statewide GHG emissions level was in 1990 and approves a statewide GHG limit that is equivalent to that level.
- January 1, 2008: CARB adopts regulations requiring the reporting and verification of statewide GHG emissions.
- January 1, 2009: CARB adopts a scoping plan for achieving the maximum technologically feasible and cost-effective reductions in GHG emissions from sources or categories of sources of GHGs by 2020.
- January 1, 2010: CARB adopts and enforces regulations to implement the GHG emission reduction measures identified on the early action list in 2007.

- January 1, 2011: CARB adopts regulations to achieve the required reduction of GHG emissions to 1990 levels by 2020.

- January 1, 2012: GHG emission limits and emission reduction measures adopted by January 1, 2011, become enforceable.

SB 1368 (Public Utilities Code §8340 et seq.) is an AB 32 companion bill that was signed into law in 2006. It requires the California Public Utilities Commission (CPUC) to establish a GHG performance standard for base load generation from investor-owned utilities, and the California Energy Commission (CEC) to establish a similar standard for publicly-owned utilities. These standards may not exceed the GHG emission rate from a base load combined-cycle natural gas fired plant. The bill also requires all imported electricity provided to California to be generated from plants meeting CPUC and CEC standards.

By enacting 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 CEQA Guidelines addressing the analysis and mitigation of GHG emissions. Those 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 CEQA Guidelines §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 CEQA Guidelines §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 CEQA Guidelines §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 CEQA Guidelines §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 CEQA Guidelines, Appendix F.)

As part of the administrative rulemaking process, the Natural Resources Agency developed a Final Statement of Reasons explaining the legal and factual bases, intent, and purpose of the CEQA Guidelines amendments. Other rulemaking documents can be accessed on the Natural Resources Agency's rulemaking website (http://ceres.ca.gov/ceqa/guidelines/). The amendments to the CEQA Guidelines implementing SB 97 became effective on March 18, 2010 (State of California 2011).

Local Policies and Regulations

The 2001 San Luis Obispo County CAP is used by the SLOAPCD to address attainment of national and State fugitive dust (PM_{10}) and ozone standards for the entire county. The CAP is

a comprehensive planning document intended to provide guidance to the SLOAPCD and other local agencies, including the County of San Luis Obispo, 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.

Local efforts to quantify and reduce GHG emissions have primarily been undertaken by the SLOAPCD. Many of the programs currently implemented by SLOAPCD to reduce emissions and exposure to criteria and toxic air pollutants may also reduce GHG emissions. The following is a brief summary of these programs:

- Rules and Regulations: Numerous rules adopted by the County Board of Supervisors and implemented by SLOAPCD to address criteria pollutant emissions also have the side benefit of reducing GHGs. 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 CO_2 emissions from that activity. SLOAPCD Rule 426 regulates landfill emissions of methane.

- Clean Fuels: SLOAPCD is actively involved in and supports the efforts of the Central Coast Clean Cities Coalition (C5), a local nonprofit coalition which promotes the use of cleaner alternative fuel technologies. With over 40% of the GHG emissions coming from mobile sources, these efforts are an essential tool in reducing fossil fuel use and associated CO_2 emissions.

- Development Review: Through the CEQA review process, SLOAPCD 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.

- Grant Programs: Many emission reduction projects funded through the various grant programs administered by SLOAPCD result in replacement or retrofit of older, high emission engines with cleaner and more efficient engines that simultaneously reduce fuel use, thus reducing CO_2 emissions. Conversion of stationary and mobile diesel engines to natural gas or electric motors also serves to reduce CO_2 emissions.

- Transportation Choices Program: In partnership with San Luis Obispo Regional Rideshare, Ride-On, and SLOAPCD, the Transportation Choices Program (TCP) is a free program offered to businesses and organizations throughout San Luis Obispo County to reduce employee and student commute trips and promote the use of alternative transportation.

- Pollution Prevention: The Pollution Prevention Program promotes the use of, and publicly recognizes small businesses which successfully employ, pollution prevention

and emission reduction techniques as part of routine operating procedures. Many of the businesses so recognized have incorporated operational changes that reduce their emissions through efficiency improvements that also reduce fuel and product use and save energy.

- Public Outreach: SLOAPCD implements a number of outreach campaigns to promote a variety of clean air programs, including backyard burning reduction programs, clean car awareness, pollution prevention, energy efficiency, and transportation alternatives, all of which promote community consciousness and lifestyle choices that can help reduce our impacts on climate change."

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.

4.4.2.3 Thresholds of Significance

The significance of potential air quality 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 SLO APCD CEQA Air Quality Handbook. The specifics of these guidelines are defined below.

CEQA Guidelines and San Luis Obispo County Initial Study Checklist

The significance of potential impacts is based on thresholds identified within Appendix G of the 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:

- Violate any state or federal ambient air quality standard, or exceed air quality emission thresholds as established by County APCD.
- Expose any sensitive receptor to substantial air pollutant concentrations.
- Create or subject individuals to objectionable odors.
- Be inconsistent with the District's CAP.
- Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.
- Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs.

SLOAPCD 2012 CEQA Air Quality Handbook

According to the April 2012 CEQA Air Quality Handbook, project impacts may 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 proximity of sensitive receptors, such that an increased cancer risk affects the population.
- If the project has the potential to emit diesel particulate matter in an area of human exposure, even if overall emissions are low.
- Remodeling or demolition operations where asbestos-containing materials will be encountered.
- If naturally occurring asbestos has been identified in the project area.
- If project has the ability to emit hazardous or toxic air pollutants in proximity of sensitive receptors, such as schools, churches, hospitals, etc.

The CEQA Air Quality Handbook defines thresholds for long-term operational emissions and short-term construction-related emissions. Depending on the level of exceedance of a defined threshold, the APCD has established varying levels of mitigation. Tables 4.4-2 and 4.4-3 summarize the thresholds for long-term operational emissions and short-term construction-related emissions requiring mitigation.

GHG and Climate Change

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

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

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

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

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

Table 4.4-2. SLOAPCD Thresholds of Significance for Operational Emissions

Pollutant	Threshold[1]	
	Daily (pounds/day)	Annual (tons/year)
Ozone Precursors (ROG*+NOx**)[2]	25	25
Diesel Particulate Matter (DPM)[2]	1.25	n/a
Fugitive Particulate Matter (PM_{10}), Dust	25	25
CO	550	n/a
Greenhouse Gases (CO_2, CH_4)	Consistency with Qualified Greenhouse Gas Reduction Plan OR 1,150 MT CO_2e/year OR 4.9 CO_2e/SP/year (residents + employees)	

1. Daily and annual emission thresholds are based on the California Health & Safety Code Division 26, Part 3, Chapter 10, §40918, and the CARB Carl Moyer Guidelines for DPM.
2. CalEEMod – use winter operational emission data to compare to operational thresholds.

Source: SLOAPCD 2012 CEQA Air Quality Handbook.

Table 4.4-3. Thresholds of Significance for Construction Operations

Pollutant	Threshold[1]		
	Daily (pounds)	Quarterly Tier 1 (tons)	Quarterly Tier 2 (tons)
ROG+NOx (Combined)	137	2.5	6.3
Diesel Particulate Matter (DPM)	7	0.13	0.32
Fugitive Particulate Matter (PM_{10}), Dust[2]	n/a	2.5	n/a
Greenhouse Gases (CO_2, CH_4, N_2O, HFC, CFC, F_6S)	Amortized and Combined with Operational Emissions		

1. Daily and quarterly emission thresholds are based on the California Health & Safety Code and the CARB Carl Moyer Guidelines.
2. Any project with a grading area greater than 4.0 acres of worked area can exceed the 2.5-ton PM10 quarterly threshold.

Source: SLOAPCD 2012 CEQA Air Quality Handbook.

4.4.2.4 Impact Assessment and Methodology

The APCD 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 APCD emission thresholds;
- Consistency with the most recent Clean Air Plan;
- 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 determined through review of the SLOAPCD 2012 CEQA Air Quality Handbook and SLOAPCD CAP.

4.4.2.5 Project-specific Impacts and Mitigation Measures

<u>Violate Air Quality Standard or Exceed Emission Threshold</u>

As proposed, the project would result in the disturbance of approximately 3,000 square feet, including driveways, walkways, the residential structure coverage, and landscaping. This would result in the creation of construction dust, as well as short-term vehicle emissions. Long-term operational impacts would include an increase in vehicle emissions on surrounding roads. Based on the CEQA Air Quality Handbook, the project would result in less than 10 pounds per day of pollutants, which is below the threshold warranting mitigation. Therefore, potential impacts would be *less than significant* (Class III).

Expose any Sensitive Receptor to Substantial Air Pollutant Concentrations

The project is located in proximity to sensitive surrounding land uses, and homeowners in the vicinity of the proposed project have expressed concern related to the impacts construction activities would have on surrounding properties. Construction activities can generate fugitive dust, which could be a nuisance to residents and businesses in proximity to the project site. Dust complaints could result in a violation of the APCD's 402 Nuisance Rule. In addition, operation of construction equipment, including equipment idling, generates diesel particulate matter, which can have an adverse effect on sensitive receptors.

AQ Impact 1 **Construction of the proposed project would generate fugitive dust, which could become a nuisance to local residents and businesses in proximity to the construction site.**

AQ/mm-1 *Prior to initiation of construction, the project applicant shall implement the following dust control measures:*

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 would be required whenever wind speeds exceed 15 miles per hour. Reclaimed (non-potable) water should be used whenever possible;*

c. *All dirt stockpile areas should be sprayed daily as needed; and*

d. *All roadways, driveways, sidewalks, etc., to be paved should be completed as soon as possible, and building pads should be lain as soon as possible after grading unless seeding or soil binders are used.*

Residual Impact

Implementation of this measure would reduce impacts associated with short-term construction-related emissions to be *less than significant with mitigation* (Class II).

AQ Impact 2 **Use of construction equipment would generate diesel particulate matter, potentially resulting in an adverse effect to sensitive receptors within 1,000 feet of the project site.**

AQ/mm-2 *Prior to issuance of construction permits, the applicant shall include the following measures on applicable grading and building plans:*

Idling Restrictions near Sensitive Receptors for Both On and off-Road Equipment

a. *Staging and queuing areas shall not be located within 1,000 feet of sensitive receptors;*

b. *Diesel idling within 1,000 feet of sensitive receptors is not permitted;*

c. *Use of alternative fueled equipment is recommended whenever possible; and,*

d. *Signs that specify the no idling requirements must be posted and enforced at the construction site.*

Idling Restrictions for On-road Vehicles

a. *Section 2485 of Title 13, the California Code of Regulations limits diesel-fueled commercial motor vehicles that operate in the State of California with gross vehicular weight ratings of greater than 10,000 pounds and licensed for operation on highways. It applies to California and non-California based vehicles. In general, the regulation specifies that drivers of said vehicles:*

    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 100 feet of a restricted area, except as noted in Subsection (d) of the regulation.*

Signs must be posted in the designated queuing areas and job sites to remind drivers of the 5 minute idling limit. The specific requirements and exceptions in the regulation can be reviewed at the following web site: www.arb.ca.gov/msprog/truck-idling/2485.pdf.

Idling Restrictions for off-Road Equipment

a. *Off-road diesel equipment shall comply with the 5 minute idling restriction identified in Section 2449(d)(3) of the California Air Resources Board's In-Use off-Road Diesel regulation: www.arb.ca.gov/regact/2007/ordiesl07/frooal.pdf.*

b. *Signs shall be posted in the designated queuing areas and job sites to remind off-road equipment operators of the 5 minute idling limit.*

Residual Impact

Implementation of this measure would reduce impacts associated with short-term construction-related emissions to be *less than significant with mitigation* (Class II).

Create or Subject Individuals to Objectionable Odors

The project consists of a residence, which will not require the storage or use of any materials or equipment that would generate objectionable odors. Therefore, potential impacts would be *less than significant* (Class III).

Clean Air Plan Consistency

The project is consistent with the general level of development anticipated and projected in the CAP, including promotion of residential infill in proximity to essential services and alternative transportation services. Therefore, potential impacts would be *less than significant* (Class III).

Generate GHG Emissions

The proposed project would result in an increased use of vehicles and electricity, each of which generate small amounts of CO_2, N_2O, and HFCs. The APCD provided comments on the project that indicated through URBEMIS modeling that the project would result in approximately 84 pounds per day of CO_2 in the summer and 102 pounds per day in the winter (APCD Comment Letter dated December 23, 2008).

Based on *Table 1-1: Operational Screening Criteria for Project Air Quality Analysis* (SLOAPCD 2012), construction and operation of one single-family residence would not exceed 1,150 MT of CO_2e/year threshold. In addition, the project includes elements that will reduce GHG emissions, including compliance with current Title 24 Energy requirements (electricity reduction for cooling/heating), use of solar panels to reduce demand from GHG-emitting power plants, location within a garbage service area that is recycling over 50% of its wastes (electricity reduction), and requirement to recycle at least 50% of its construction wastes.

Because the project proposes only one single-family residence in an existing residential neighborhood, and is consistent with land use components necessary to meet the goals of AB32 and set forth in the Clean Air Plan, this increase in GHGs is not considered significant. Therefore, no significant adverse GHG impacts would occur as a result of the proposed project, and no mitigation measures are necessary (Class III).

Conflict with Applicable Plan, Policy, or Regulation

The proposed project is consistent with the APCD's CEQA Handbook and County's EnergyWise Plan because it consists of a residential development within an urban area, in proximity to recreational resources and opportunities for alternative transportation, such as walking and bicycling. As noted above, the project includes energy-efficiency measures, including incorporation of solar energy. Potential impacts would be *less than significant* (Class III).

4.4.2.6 Cumulative Impacts

The cumulative study area for air quality impacts is the South Central Coast Air Basin (SCCAB). The project would contribute criteria pollutants during project construction and long-term operational use, including ozone precursors and particulate matter. No major projects are proposed in the immediate vicinity of the project site; however, a number of large development projects are currently under review by the County, and cities within the county, including mixed-use, residential, commercial, and solar energy projects. These projects may be under construction simultaneously with the project and, in the long term, would be generating similar air emissions due to use of construction equipment, increased traffic trips, and energy use.

Depending on construction schedules and actual implementation of projects in the air basin, generation of fugitive dust and pollutant emissions during construction could result in short-term increases in air pollutants. Analysis conducted specifically for this project concluded that implementation of the proposed project would not significantly contribute to cumulative long-term operational air quality impacts because it would not exceed the daily ROG+NO_x threshold. GHG impacts, including those described above, all contribute cumulatively with those produced worldwide, to affect climate change. Compliance with identified air quality, energy efficiency, and water conservation mitigation measures would reduce the project's contribution to cumulative GHG emissions, and subsequent climate change. Cumulative effects would be *less than significant* (Class III).

4.4.3 Biological Resources

4.4.3.1 Existing Conditions

The project site consists of a residential lot located on the west side of Highway 1 and Studio Drive. In the Cayucos area, lands west of Highway 1 consist of disturbed coastal bluffs that support grasslands and sporadic occurrences of coastal bluff scrub. Sand dunes and the beach are located just below the bluffs. The bluffs, dunes, and beach have been disturbed by passive recreational use. The northeastern portion of the project site is dominated by ice plant (*Carpobrotus chilensis)* and some grasses. The southwestern portion of the project site consists of beach sands and sea rocket (*Cakile maritima*), an invasive weed. A mature Monterey cypress (*Cupressus macrocarpa*), long-leaf pine (*Pinus palustris*), and ornamental bush are located along the southern property line.

Wildlife use of the upper portion of project site is expected to be low because it provides little vegetative diversity and cover for wildlife species. The sandy beach habitat is located within the southwestern portion of the site, and adjacent to the property boundary. Common and special-status shorebirds including long-billed curlew (*Numenius americanus*) and California brown pelican (*Pelecanus occidentalis californicu*s) frequently forage and roost on sandy beach habitats. Sandy beaches also provide habitat for the western snowy plover and numerous invertebrates.

Sensitive biological resources include Environmentally Sensitive Habitat Areas (ESHAs), special-status plants, and special-status wildlife. The California Coastal Act defines ESHAs as "any area in which plant or animal life or their habitats are either rare or especially valuable because of their nature or role in an ecosystem and which could be easily disturbed or degraded by human activities and developments." Under this definition, unique plant habitats, rare and endangered animal habitats, wetlands, coastal streams, rocky points, intertidal areas, and kelp beds are typically considered ESHAs.

The project site does not support any designated ESHAs. The closest ESHA is Old Creek, located approximately 600 feet northwest of the project site. The creek flows under Highway 1 and into the Pacific Ocean.

<u>Special-status Plant Species</u>

Based on the California Natural Diversity Database (CNDDB) records search and SWCA's knowledge of the area, nine special-status plant species are documented in the project area (Cayucos Quadrangle). Red sand verbena (*Abronia maritima*), Cambria morning-glory (*Calystegia subacaulis* ssp. *episcopalism*), San Luis Obispo owl's clover (*Castilleja densiflora* ssp. *obispoensis*), and California seablite (*Suaeda californica*) have known occurrences in the

area. The existing conditions onsite do not support habitat conditions for these species, and the site is covered with iceplant and sea rocket. Table B-1 in Appendix B provides SWCA's rationale for determining whether or not the project site provides suitable conditions for a particular species.

Special-status Animal Species

The CNDDB records search identified nine special-status wildlife species that have known occurrences in the reviewed quadrangle. The existing conditions in the project area provide suitable conditions for two of the listed wildlife species (refer to Table B-2 in Appendix B). Western snowy plover (*Charadrius alexandrinus nivosus*) (foraging habitat) and coast horned lizard (*Phrynosoma coronatum*) have known occurrences in the project area and warrant special considerations during project design and implementation. Impacts to these species and recommended mitigation measures are presented in this section.

4.4.3.2 Regulatory Setting

Federal Policies and Regulations

Section 404 of the Clean Water Act of 1977

Pursuant to Section 404 of the Clean Water Act (33 United States Code 1344), the USACE is responsible for the issuance of permits for the placement of dredged or fill material into "waters of the U.S." As defined by USACE at 33 CFR 328.3(a)(parts 1-6), the following summarizes waters of the U.S.:

> *"Those waters that are currently used, or 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; tributaries and impoundments to such waters; all interstate waters including interstate wetlands; and territorial seas."*

Waters of the U.S. are typically identified by the presence of an ordinary high water mark and connectivity to traditional navigable waters or other jurisdictional features. If a project would result in dredge or fill of USACE jurisdictional waters, the project would be subject to USACE review under Section 404 of the Clean Water Act.

Section 401 of the Clean Water Act of 1977

Section 401 of the Clean Water Act and its provisions ensure that federally permitted activities comply with the federal Clean Water Act and state water quality laws. Section 401 is implemented through a review process that is conducted by the RWQCB, and is triggered by the Section 404 permitting process. The 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 falls under the jurisdiction of the RWQCB. Proposed project activities that have the potential to result in impacts to water quality and quantity would require certification by the RWQCB.

Federal Endangered Species Act of 1973

The Federal Endangered Species Act (ESA) provides legislation to protect federally listed plant and animal species. Impacts to listed species resulting from the implementation of a project would require the responsible agency or individual to formally consult with the U.S.

Fish and Wildlife Service (USFWS) or NOAA National Marine Fisheries Service (NOAA Fisheries) to determine the extent of impact to a particular species. If USFWS or NOAA Fisheries determine that impacts to a species would likely occur, alternatives and measures to avoid or reduce impacts must be identified. USFWS and NOAA Fisheries also regulate activities conducted in federal critical habitat, which are geographic units designated as areas that support primary habitat constituent elements for listed species.

Migratory Bird Treaty Act of 1918

The Migratory Bird Treaty Act (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 1800's. 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. Several migratory bird species were present in the project corridor. If ground disturbing activities were implemented during the nesting bird season, pre-disturbance nesting bird surveys would need to be conducted to avoid impacts to migratory birds.

State Policies and Regulations

California Endangered Species Act

The California Endangered Species Act (CESA) ensures legal protection for plants listed as rare or endangered, and species of wildlife formally listed as endangered or threatened. The state law also lists California Special Concern species based on limited distribution, declining populations, diminishing habitat, or unusual scientific, recreational, or educational value. Under state law, the California Department of Fish and Wildlife (CDFW) is empowered to review projects for their potential to impact state-listed species and California Special Concern species, and their habitats.

Section 1602 of the Fish and Game Code

The CDFW is responsible for conserving, protecting, and managing California's fish, wildlife, and native plant resources. To meet this responsibility, the law requires any person, state or local government agency, or public utility proposing a project that may impact a river, stream, or lake to notify the CDFW before beginning the project. If the CDFW determines that the proposed project may adversely affect existing fish and wildlife resources, a Lake or Streambed Alteration Agreement is required. A Streambed Alteration Agreement lists the CDFW conditions of approval relative to the proposed project, and serves as an agreement between an applicant and the CDFW for a term of not more than five years for the performance of activities subject to this section. A Streambed Alteration Agreement from the CDFW would be required prior to any direct or indirect impact to streambeds, banks, channels or associated riparian resources.

Other Sections of the Fish and Game Code

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

California Coastal Act

The CCA was enacted in 1976 to provide long-term protection of California's coastal resources. The Act's coastal resources management policies are based on recommendations contained in the California Coastal Plan. One such policy includes:

> *"Protection, enhancement and restoration of environmentally sensitive habitats, including intertidal and nearshore waters, wetlands, bays and estuaries, riparian habitat, certain wood and grasslands, streams, lakes, and habitat for rare or endangered plants or animals."*

The California Coastal Commission must evaluate proposed impacts to wetlands. For wetland delineations in the Coastal Zone, the California Coastal Commission utilizes a single-parameter definition (in addition to the USACE three-parameter methodology). Delineations performed using the California Coastal Commission definition generally results in larger wetland areas than a corresponding USACE delineation of the same site. This is due to the difference in identifying criteria between methods.

4.4.3.3 Thresholds of Significance

The significance of potential biological impacts is based on County of San Luis Obispo thresholds, in accordance with Appendix G of the CEQA Guidelines. Biological impacts would be considered significant if the proposed project would:

- Result in a loss of unique or special status species or their habitats;
- Reduce the extent, diversity, or quality of native or other important vegetation;
- Impact wetland or riparian habitat;
- Introduce barriers to movement of resident or migratory fish or wildlife species, or factors, which could hinder the normal activities of wildlife.

4.4.3.4 Impact Assessment and Methodology

The 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. 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 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.

4.4.3.5 Project-specific Impacts and Mitigation Measures

<u>Unique or Special-Status Species or their Habitats</u>

The project site is located on beachfront property, immediately west of Studio Drive. The site is covered with common iceplant on the upper slope, and sea rocket (invasive weed) on the beach sands. The site does not include any features suitable for aquatic species. The sandy

beach area provides foraging habitat for a variety of birds, including western snowy plover (*Charadrius alexandrinus*), California black rail (*Laterallus jamaicensis coturniculus*), California brown pelican (*Pelecanus occidentalis*), and California least tern (*Sterna antillarum browni*). The mature cypress tree (to remain) and adjacent pine (to be removed) along the southern property boundary may provide tree nesting opportunities for birds. Due to the location of the project site and presence of suitable habitat in the area, precautionary measures are recommended to ensure impacts to snowy plover and other bird species are avoided.

The project site provides suitable habitat for coast horned lizard and other common reptiles. Grading activities could result in direct take of coast horned lizard and other reptiles if present. Direct take may include being struck by equipment, entrapped in stockpiled materials or trenches, or trampled or collected by construction personnel.

Old Creek provides habitat for a variety of special-status species noted above. The project is located approximately 600 feet from the creek, and would not directly affect the ESHA or special-status species within the creek. Inadvertent impacts to special-status species may occur including use of equipment and storage of materials outside the property boundary, and leaks, spills, and debris adversely affecting the beach areas surrounding the parcel. Degradation of habitat would have an adverse effect on special-status species, and other wildlife in the area.

BR Impact 1 **Construction of the project may have an adverse impact on special-status species and their habitats, including off-site use of equipment, storage of materials, and inadvertent transport of debris or discharge of oils, fuels, and other pollutants into the beach area.**

BR/mm-1 *Prior to issuance of construction permits, the applicant shall submit documentation verifying designation of a qualified environmental monitor for all measures requiring environmental mitigation to ensure compliance with Conditions of Approval and EIR mitigation measures. The monitor shall be responsible for: (1) ensuring that procedures for verifying compliance with environmental mitigations are followed; (2) lines of communication and reporting methods; (3) daily and weekly compliance reporting; (4) construction crew training regarding environmentally sensitive areas; (5) authority to stop work; and (6) action to be taken in the event of non-compliance. Monitoring shall be at a frequency and duration determined by the affected natural resource agencies (e.g., USACE, CDFW, RWQCB, California Coastal Commission, USFWS, and the County).*

BR/mm-2 *Prior to the initiation of construction, the environmental monitor shall conduct environmental awareness training for all construction personnel. The environmental awareness training shall include discussions of sensitive habitats and animal species in the immediate area. Topics of discussion shall include: general provisions and protections afforded by the Endangered Species Act; measures implemented to protect special-status species; review of the project boundaries and special conditions; the monitor's role in project activities; lines of communications; and procedures to be implemented in the event a special-status species is observed in the work area.*

BR/mm-3 *At the time of application for construction permits all grading plans shall clearly show the location of project delineation fencing, including protection fencing surrounding the Monterey cypress tree on the southern property boundary.*

BR/mm-4 *Prior to the initiation of construction, the applicant's contractors and the environmental monitor shall coordinate the placement of project delineation fencing throughout the work areas. The environmental monitor shall field fit the placement of the project delineation fencing to minimize impacts to sensitive resources. The project delineation fencing shall remain in place and functional throughout the duration of the project. During construction, no project related work activities shall occur outside of the delineated work area.*

BR/mm-5 *At the time of application for grading permits, all applicable plans shall clearly show stockpile and staging areas. Stockpiles and staging areas shall not be placed in areas that have potential to experience significant runoff during the rainy season. All project-related spills of hazardous materials within or adjacent to project sites shall be cleaned up immediately. Spill prevention and cleanup materials shall be on-site at all times during construction. The staging areas shall conform to standard BMPs applicable to attaining zero discharge of storm water runoff. At a minimum, all equipment and vehicles shall be checked and maintained on a daily basis to ensure proper operation and to avoid potential leaks or spills. Maintenance, cleaning, and refueling of equipment and vehicles shall not be permitted onsite, within adjacent beach areas, or on Studio Drive.*

BR/mm-6 *Prior to issuance of construction permits, the applicant shall submit a detailed sediment and erosion control plan for approval, which shall address both temporary and permanent measures to control erosion and reduce sedimentation. Erosion and soil protection shall be provided on all cut and fill slopes. Revegetation shall be facilitated by mulching, hydro-seeding or other methods, and shall be initiated as soon as possible after completion of grading, and prior to the onset of the rainy season (October 15). Permanent revegetation and landscaping shall emphasize native shrubs, and trees, to improve the probability of slope and soil stabilization without adverse impacts to slope stability due to irrigation infiltration and long-term root development. All plans shall show that sedimentation and erosion control measures are installed prior to any other ground disturbing work.*

Residual Impact

Due to the project's proximity to beach tidal areas and sensitive habitats, mitigation is recommended to contain disturbance to the project site. Compliance with these measures, and verification by an environmental monitor, will ensure these measures are enforced during construction. Upon completion of the project, no long-term impacts would occur. Potential short-term impacts would be *less than significant with mitigation* (Class II).

BR Impact 2 **Construction activities conducted during the nesting season (March through September) could directly or indirectly impact nesting western snowy plover and other bird and bat species.**

BR/mm-7 *Upon application for construction permits, the following measure shall be included on all applicable plans: The applicant shall avoid ground disturbing activities conducted during the snowy plover nesting season to the extent feasible. If work activities must occur during the nesting season the following measures shall be taken:*

a. *Prior to installation of the project delineation fencing and the commencement of site grading, a qualified biologist shall conduct a series of pre-construction nesting bird surveys for western snowy plover. Surveys shall be conducted every other day for two weeks prior to any project related disturbances.*

b. *Surveys for snowy plovers shall include walking through all potential nesting and foraging habitat within 300 feet of the site on each survey day. The survey area shall include all available snowy plover nesting habitat within 300 feet of anticipated project activities.*

c. *The number of snowy plover individuals observed and their activities (e.g. nesting, foraging, resting, etc.) shall be documented. All documented occurrences would be reported to USFWS and documented on the CNDDB.*

d. *If nesting activity is identified, all project activities within 300 feet of the nest shall be delayed until the nesting activity has ceased.*

e. *During construction, the environmental monitor shall conduct snowy plover surveys twice a week (preferably two to three days apart).*

BR/mm-8 *Upon application for construction permits, the following measure shall be included on all applicable plans: If commencement of construction begins between March and September, the environmental monitor shall conduct pre-construction nesting bird surveys. If nesting activity is identified, the following measures shall be implemented:*

a. *If active nest of common passerine or shorebird species' are observed in the work area or within 100 feet of the work area, construction activities shall be modified and or delayed as necessary to avoid direct take or indirect disturbance of the nests, eggs, or young.*

b. *If active nest sites of raptors or other special-status species are observed within the work area or 300 feet of the work area, the environmental monitor shall establish a suitable buffer around the nest site. Construction activities in the buffer zone shall be prohibited until the young have fledged the nest and achieved independence.*

c. *Active raptor or special-status species nests should be documented by a qualified biologist and a letter report should be submitted to the County, USFWS, and CDFW, documenting project compliance with the MBTA and applicable project mitigation measures.*

Residual Impact

Due to the project's proximity to beach tidal areas and areas used by snowy plover for nesting habitat, mitigation is recommended to ensure and verify avoidance of western snowy plover. Although unlikely, nesting birds may occupy vegetation along the southern property line. Implementation of pre-construction surveys will ensure avoidance. Compliance with these measures, and verification by an environmental monitor, will ensure these measures are enforced during construction. Upon completion of the project, no long-term impacts would occur. Potential short-term impacts would be *less than significant with mitigation* (Class II).

BR Impact 3 **The proposed project could result in direct take of coast horned lizard during project grading and construction.**

BR/mm-9 *Upon application for construction permits, the following measure shall be included on all applicable plans: Prior to site grading, the environmental monitor shall conduct a survey for coast horned lizard and other reptiles. The surveyor shall utilize hand search methods in areas of disturbance where coast horned-lizards are expected to be found (e.g., under shrubs, other vegetation, or debris). Any lizards located during this survey should be safely removed from the construction area and placed in suitable habitat.*

Residual Impact

Short-term impacts resulting from this project to coast horned lizard would be *less than significant with mitigation* (Class II).

Native or Other Important Vegetation

One cypress tree is located adjacent to the project site, which is considered an important native species along the California coastline. This tree would remain. One small pine tree would be removed; however, this species is not considered native or important vegetation in this location. No other native or important vegetation would be directly affected by the project. Mitigation is recommended to ensure protection of the cypress tree.

BR Impact 4 **Construction of the project may impact the root zone or result in inadvertent disturbance of a mature cypress tree.**

Implement BR/mm-3 and BR/mm-4.

Residual Impact

Short-term impacts resulting from this project to native or other important vegetation would be *less than significant with mitigation* (Class II).

Wetland or Riparian Habitat

No wetland or riparian habitat is present onsite. As noted above, Old Creek is located approximately 600 feet north of the site. Based on the location of the project, impacts to wetland or riparian habitat would not occur.

Barriers to Movement of Resident Species / Wildlife Activity

During construction of the project, noise would be generated during daytime hours, which may deter bird species from using nearby tidal areas for foraging. The project site is small and located in an area that experiences high levels of recreation activity along an extensive stretch

of coastline. The project site is not located within a migration corridor or immediately adjacent to an ESHA, riparian area, or estuary. Therefore, this effect is temporary and would have no significant short or long-term impacts on resident and migratory species.

4.4.3.6 Cumulative Impacts

No major projects are scheduled to be constructed during a similar timeframe as the project. The closest known project is the Morro Bay to Cayucos Connector, which would run along Studio Drive adjacent to the project site, within the paved area. The timing for construction of that project is currently undetermined. Based on the location and size of the project, and implementation of recommended mitigation measures, the project would not have any significant residual direct or indirect adverse impacts to sensitive biological resources, including special-status species, habitats, and wildlife. The site is not within a designated ESHA. The project would not significantly contribute to the loss of species or sensitive habitat. Therefore, potential cumulative impacts would be *less than significant* (Class III).

4.4.4 Hazards and Hazardous Materials

4.4.4.1 Existing Conditions

According to the San Luis Obispo County Safety Element Maps (Maps 7 and 8), the project site lies within the Medium Fire Hazard Zone and the 15-Minute Response Zone (County of San Luis Obispo 2000). The Cayucos Fire Station, Station 11, is located at 2250 Chaney Street, approximately 1 mile southeast of the project site. The project location is not within any airport review area and is not located within an area of known hazardous material contamination.

The Hazardous Waste and Substances Sites List (commonly referred to as the “Cortese List”) is a planning document that provides information about the location of hazardous materials release sites developed annually by the California EPA (CalEPA) Department of Toxic Substances Control (DTSC) and stored in the EnviroStor database. No properties within Cayucos are listed on the Cortese List. The only three properties in San Luis Obispo County listed are: (1) the Baywood Park Training Area, a former military firing range located in Montaña de Oro State Park and surrounding areas; (2) Camp San Luis Obispo, a former military firing range located approximately 7 miles east of Morro Bay along Highway 1; and (3) the Buena Vista and Klau mercury mines located approximately 12 miles northwest of the city of Paso Robles. Cleanup at all three sites is ongoing. The nearest site is the Baywood Park Training Area, located 9 miles south of the project site.

The SWRCB’s GeoTracker database provides a list of leaking underground storage tank sites and that list has identified the Mobil Estero Marine Terminal site at the intersection of Highway 1 and Studio Drive (located approximately 300 feet northeast of the project site) as a cleanup program site. Crude oil was detected in the soil during a pipeline decommissioning/ abandonment done by Chevron in 2003. Approximately 1 cubic yard of soil was treated, and the above ground tank and facility decommissioning was overseen by County Environmental Health. The cleanup status of the site is completed, and the case is closed.

No properties within the community of Cayucos are listed on the California EPA’s list of solid waste disposal sites with waste constituents above hazardous waste levels or list of parcels with active Cease and Desist Orders (CDOs) or Cleanup and Abatement Orders (CAOs) issued by the SWRCB.

Based on a review of County maps and documents, the following hazards were identified in the project vicinity.

Whale Rock Reservoir

The project site is within the Whale Rock Reservoir inundation area along with many other residences in the Cayucos area. At full capacity, Whale Rock Reservoir contains 40,600 acre-feet of water behind an earth-filled dam constructed in 1960 (County of San Luis Obispo 2008). In the event of a complete dam failure at Whale Rock, water is expected to flow in a southwesterly direction along Old Creek (approximately 1,000 feet in each direction of the centerline of the creek) down to the community of Cayucos at 13th Street and Ocean Avenue. At 13th Street and Ocean Avenue, the flooding area is expected to widen to include 3rd Street to the north and Willow Creek (Montecito Road) to the south until flood waters dissipate into the Pacific Ocean. Major impacts to life and property to approximately one-third of the community of Cayucos could occur. Approximately 1,500 residential, recreational, and small business occupants could be affected and major roads flooded may include portions of Highway 1. No special facilities would be affected by a dam failure (County of San Luis Obispo 2008).

The County has adopted the "Dam and Levee Failure Evacuation Plan" as part of its Emergency Operations Plan (revised July 2008) in the event of a facility failure. "The primary purpose of this plan is to establish and define emergency management procedures and organizational response for overall coordination of public protective public actions that may be needed in the event of [dam] failure." In the very unlikely event of a catastrophic failure at Whale Rock Reservoir, the County is equipped with a plan and resources designed to reduce loss of life and property to the greatest extent feasible.

Old Creek

Old Creek is located approximately 600 feet northwest of the project site and the Pacific Ocean lies immediately to the west. Per the County Department of Public Works and the County's flood maps, the project site is not located within a flood hazard area associated with either Old Creek or the Pacific Ocean. Project site elevations range from approximately 10 to 30 feet. Due to the construction of Whale Rock dam, the potential for damage from 100-year storm events are substantially reduced because of the dam's capacity to absorb substantial runoff before reaching the top of the dam. A drainage plan is required prior to the issuance of any construction permits for the project, which is subject to review and approval by the County Department of Public Works. All finished floor elevations are located above/outside the 100-year flood hazard elevation.

Diablo Canyon Nuclear Power Plant

The Diablo Canyon Nuclear Power Plant is located on the coast approximately 19 miles south of the proposed project site. The project site is located within the Diablo Canyon Emergency Planning zone, specifically within Protective Active Zone 9. The plant contains two operational power generating units, each of which is a pressurized water-type reactor having an electric power generating capacity in excess of 1,000 megawatts (County of San Luis Obispo 2006). As with any other industrial facility, an accident is always possible when a nuclear power plant is operated. The Diablo Canyon plant is designed to use slightly enriched uranium dioxide (UO_2) as a fuel. This fuel poses no major concern in its un-irradiated state as it has very low radioactivity. However, after being in the core during operation of the reactor, the fuel becomes highly radioactive from fission by-products. These highly radioactive by-products are the main

hazard in a nuclear plant accident. Spent fuel from the reactors is stored in spent fuel water pools under at least 20 feet of water, which provides adequate shielding from radiation for anyone near the pool.

The principal deterrent to a nuclear accident is prevention through correct design, construction and operation, including redundant safety systems, which assures that the integrity of the reactor and related systems are maintained (County of San Luis Obispo 2006). Protective systems are installed and are automatically activated to counteract the resulting effects when any part of the reactor system fails. The County has adopted the San Luis Obispo County/Cities Nuclear Power Plant Emergency Response Plan (revised October 2006), which is made up of three parts: (1) the Administrative Plan, which provides an overview of all three parts of the plan; (2) reference materials such as maps and charts; and (3) a compilation of 53 Standard Operating Procedures (SOPs) that provide emergency response guidelines for individual agencies, jurisdictions, or specific roles related to nuclear power plant emergency response. The SOPs are stand-alone response guides and Part 3 of the plan includes SOPs for the California Highway Patrol, County Fire Department, Caltrans, the Sheriff's Department, the County Emergency Services Director, procedures for emergency public information, and procedures for emergency worker monitoring, among others. This plan recognizes the need for emergency response for urban and non-urban development within the Diablo Canyon Emergency Planning Zone, and mitigates the potential for loss of life during a catastrophic event.

Tsunami Hazard Area

The project site is within the potential tsunami inundation area as identified on the County of San Luis Obispo Department of Planning and Building Interactive Geographic Information System (GIS) Mapping System. A tsunami is an ocean wave generated by vertical displacement of the sea floor during an earthquake, a large-scale submarine slope failure, or volcanic eruption. In deep ocean water, tsunamis may travel as fast as 600 miles per hour. Upon entering the shallower waters of the coastline, the velocity of the waves decreases but wave height increases. Tsunamis can crest to heights of 100 feet or more (County of San Luis Obispo 1999). Several small tsunami events have been recorded in San Luis Obispo County; however, previous studies have predicted a maximum tsunami wave run-up of approximately 9.5 feet above sea level for a 100-year event or 24.2 feet for a 500-year storm event. A tsunami during a storm surge could add an additional 14.5 feet of wave runup. Therefore, the County has decided to utilize an inundation of 50 feet above mean sea level for emergency planning purposes (County of San Luis Obispo 2005).

Coastal developments most vulnerable to tsunami hazards are those located near mouths of streams that drain into the Pacific Ocean, such as Cayucos Creek, Little Cayucos Creek, Old Creek, and Willow Creek in Cayucos (County of San Luis Obispo 2005). Based on the estimated worst case scenario of tsunami wave run-up of 50 feet, the tsunami hazard is greatest for that portion of the community below elevations of 50 feet above mean sea level; this includes the project site and a majority of the community of Cayucos.

The tsunami hazard for San Luis Obispo County is reported in the *County Safety Element* (1999) and the *Tsunami Emergency Response Plan* (October 2005). Tsunamis are not a common occurrence along the central coast, but there is always the possibility of one occurring. Most recently, numerous areas along the California coastline, including the coastal area of Morro Bay and Cayucos, experienced moderate to powerful tsunami waves resulting from the 9.0 earthquake that struck offshore Japan on March 11, 2011.

The Alaska Warning Center is responsible for issuing California tsunami warnings to the California State Warning Center, which in turn, notifies affected counties. As part of the County Emergency Operations Plan, the Tsunami Response Plan is in place to ensure preparedness for protection of life and property in the event of a tsunami. The primary purpose of the plan is to establish and define emergency management procedures, organizational response and coordination related to receipt of a tsunami advisory, warning, or the occurrence of an actual tsunami along the San Luis Obispo County coastline. The Tsunami Response Plan is reviewed at least annually and after every emergency incident in which the plan is used, which ensures that the plan remains as current as possible.

4.4.4.2 Regulatory Setting

Hazards and hazardous material management is subject to multiple laws, policies, and regulations at all levels of government. The agencies responsible for enforcing applicable laws and regulations develop and enforce standards for the handling and clean-up of specific materials determined to pose a risk to human health or the environment. The enforcing agency at the local level for the proposed project area is the County Public Health Department, Division of Environmental Health. Enforcement agencies at the State level include two branches of CalEPA, DTSC, and RWQCB.

Federal Regulation

The EPA is the Federal agency responsible for enforcement and implementation of Federal laws and regulations pertaining to hazardous materials. In addition, the EPA provides oversight and supervision for some site investigation/remediation projects. For disposal of certain hazardous wastes, the EPA has developed land disposal restrictions and treatment standards.

State Regulation

The project site is located within the jurisdiction of the Central Coast RWQCB. The RWQCB is authorized by the California Porter-Cologne Water Quality Act of 1969 (“the Porter-Cologne Act”), to implement water quality protection laws. When the quality of the groundwater or the surface waters of the State is threatened, the RWQCB has the authority to require investigations and remedial actions. In addition, the Central Coast RWQCB is the State regulatory agency that oversees the local Leaking Underground Fuel Tank (LUFT) program, which was established to regulate underground fuel tanks. Under the LUFT program, local implementing agencies are required to permit, inspect, and oversee monitoring programs to detect leakage of hazardous materials. The RWQCB has been involved with the regulation of the Marine Terminal Remediation activities.

In California, the DTSC, a branch of CalEPA, works in conjunction with, or in lieu of, the EPA to enforce and implement specific hazardous materials laws and regulations. California has enacted its own legislation pertaining to the management of hazardous materials. The Hazardous Waste Control Act created the state hazardous waste management program, which is similar to, but more stringent than, the federal Resource Conservation and Recovery Act program. The act is implemented by regulations contained in CCR Title 26, which describes required aspects for the proper management of hazardous waste. California has also developed an emergency response plan to coordinate emergency services provided by federal, state, and local agencies under the Emergency Services Act. Rapid response to incidents involving hazardous materials or hazardous waste is an important part of the plan, which is administered by the California Office of Emergency Services. The office coordinates

the responses of other agencies, including EPA, the California Highway Patrol, regional water quality control boards, air quality management districts, and county disaster response offices.

Local Regulation

The County Office of Emergency Services (OES) is an emergency management agency with responsibilities that include coordination of emergency and disaster preparedness planning, response, and recovery with and between local, state, and federal agencies. The OES is responsible for reviewing and implementing the Dam and Levee Failure Evacuation Plan, Cities Nuclear Power Plant Emergency Response Plan, and Tsunami Response Plan. The County OES is committed to serving the public before, during and after times of emergency and disaster by promoting effective coordination between agencies, and encouraging emergency preparedness of the public and organizations involved in emergency response. Pursuant to State law and local ordinance, the County's Environmental Health Services Division conducts inspections to ensure proper handling, storage, and disposal of hazardous materials and proper remediation of contaminated sites.

4.4.4.3 Thresholds of Significance

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

- Result in a risk of explosion or release of hazardous substances (e.g. oil, pesticides, chemicals, radiation) or exposure of people to hazardous substances.
- Interfere with an emergency response or evacuation plan.
- Expose people to safety risks associated with airport flight patterns.
- Increase fire hazard risk or expose people or structures to high fire hazard conditions.
- Create any other health hazard or potential hazard.

4.4.4.4 Impact Assessment and Methodology

The EIR impact analysis focuses on potential safety and health risks associated with the proposed project, particularly from surrounding land uses that could create considerable health and safety risks in a catastrophic event. Methodology for assessing the proposed project includes a review of existing resources, including the County Safety Element, County Emergency Operations Plan, Tsunami Response Plan, and Dam and Levee Failure Evacuation Plan, as well as review of the lists of known potential sources of hazardous contamination prepared by the California Environmental Protection Agency, Department of Toxic Substances Control. Significant impacts would result if the project would interfere with an emergency response or evacuation plan, or increase the likelihood that hazardous materials or conditions would be encountered or created during project implementation due to existing conditions such as leaking underground storage tanks, or the characteristics of the proposed project.

4.4.4.5 Project-specific Impacts and Mitigation Measures

Risk of Explosion, Release, or Exposure to Hazardous Substances

The project does not propose the use or storage of hazardous materials; therefore, the risk of explosion or release of hazardous substances is not likely. The project would not result in the routine transport, use, or disposal of hazardous materials and does not create the potential for the release of hazardous materials through upset and/or accident conditions. Therefore, no hazards associated with the handling of hazardous materials would result. The project site is not located within 0.25 mile of an existing or proposed school, and is not included on the Cortese List or any other list of hazardous materials sites and would not create associated risks to the public or environment.

Interfere with Emergency Response or Evacuation Plan

Although it places residential uses within an area covered by the Dam and Levee Failure Evacuation Plan, Cities Nuclear Power Plant Emergency Response Plan, and Tsunami Response Plan, the proposed use is suitable for the location and within the general level of development projected in the response plans. The proposed project would not inhibit emergency alert, evacuation or response actions and would not conflict with any regional evacuation plan, because it is located with an existing residential lot, on a paved roadway (Studio Drive).

Airport Flight Patterns

The project site is not located within any airport review area and would not expose people to safety risks associated with airport flight patterns.

High Fire Risk

The project is not located within a high fire hazard zone and does not present a significant fire safety risk.

Other Hazards

The project proposes a single-family residence in an existing neighborhood and would not create any health or other potential hazard.

The County Office of Emergency Services prepares for catastrophic (though highly unlikely) worst case scenario events that would include a 50 foot tsunami wave run-up. However, based on review by the County Geologist and the project consultant geologist, a 9.5 foot wave run-up is considered more appropriate for a 100-year tsunami event. The project has been designed and conditioned to avoid impacts from a 100-year tsunami event and potential impacts related to wave run-up and tsunami hazards for the proposed development will be taken into account through the foundation design and finished floor elevations of the proposed residence.

An in depth analysis of tsunami and/or wave run-up hazards associated with the proposed project is included in Section 4.3, Geology and Soils. Refer to that section for additional information. No other significant adverse impacts would occur as a result of the proposed project, and no mitigation measures are necessary.

4.4.4.6 Cumulative Impacts

Due to the type of project proposed, and lack of hazards or hazardous materials within or near the project site, construction and operation of the project would not contribute to environmental impacts related to hazards. Cumulative impacts would be *less than significant (Class III)*. No additional mitigation is required.

4.4.5 Noise

4.4.5.1 Existing Conditions

Noise, as used herein, is defined as unwanted sound. Noise is a complex physical phenomenon that varies with time, geographic location, proximity to the source, and duration of the noise event. The effects of noise are generally considered in two ways: 1) how a proposed project may increase existing noise levels and potentially affect surrounding land uses; and 2) how a proposed land use may be affected by noise from existing and surrounding land uses. Since instruments that detect small changes in atmospheric pressure that are perceived as sound cannot distinguish between that which is wanted (e.g., birds singing, waves on a beach, etc.) and that which is not (e.g., traffic or railroad noise), measurements of "noise" are more accurately described as measurements of sound pressure.

Noise sources and sound intensities can vary significantly from one area of the project site to another. Variables that affect how noise is perceived include vehicular and equipment volume and activities, proximity to the noise source, time of day, speed, roadway configuration, and the acoustical and topographical characteristics of the site. For example, Highway 1 traffic noise could be substantial at a given location if the noise measurement is taken during peak hour traffic at a short distance from the highway. Given the same conditions, the same noise measured at a distance of 1,000 feet away would be perceived as barely noticeable. Sound is measured in decibels (dB), and A-weighted decibels (dBA) are an expression of the relative loudness of sounds in air as perceived by the human ear. Generally, a 1 dBA increase in the noise level is the minimum perceptible change the human ear can detect. A 3 dBA change is readily noticeable by most people, and a 10 dBA change would be perceived as twice as loud or approximately a doubling of the noise level.

Motor vehicles are typically the primary noise source in California cities, but noise sources and intensities can vary significantly over fairly small areas. Certain land uses are considered more sensitive to ambient noise levels than others, due to the amount of noise exposure and the types of activities involved; noise sensitive land uses include residential uses. The effects of noise are considered in two ways: how a proposed project may increase existing noise levels and affect surrounding land uses, and how a proposed land use may be affected by noise from existing and surrounding land uses. The project is proposed in the vicinity of several noise sensitive uses, including residences along Studio Drive and Ocean Boulevard and the outdoor sports and recreation uses associated with adjacent State Park land and the beach.

4.4.5.2 Regulatory Setting

Noise is regulated predominantly at the state and local levels through regulations, policies, and local ordinances. The Federal Noise Control Act of 1972 recognized that noise control protects the health and welfare of the population; however, it gave responsibility for controlling noise sources to state and local governments. The federal law does provide standards for interstate commerce projects (i.e., airports), and the federal government also provides uniform procedures to evaluate highway noise and implement abatement measures through the

Federal Highway Administration (FHWA), 23 CFR 772. These standards are commonly adapted for state and local use based on prevailing local conditions or special requirements.

The California Government Code, in its State General Plan Guidelines, requires that local governments identify major noise sources and areas containing noise sensitive land uses. Noise must be quantified by preparing generalized noise exposure contours for current and projected conditions. Noise contours for San Luis Obispo County are located in the Noise Element of the County General Plan.

4.4.5.3 Thresholds of Significance

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

- Expose people to noise levels that exceed the County Noise Element thresholds.
- Generate increases in the ambient noise levels for adjoining areas.
- Expose people to severe noise or vibration.

4.4.5.4 Impact Assessment and Methodology

The EIR impact analysis focuses on potential impacts associated with vehicle noise on Highway 1. The prediction of noise levels and the subsequent estimation of impacts at the project site were conducted through a review of existing resources, including the County Noise Element, Land Use Ordinance, and Building Code. Significant impacts would result if the project would expose people to noise levels that exceed County Noise Element thresholds or expose people to severe noise or vibration.

4.4.5.5 Project-specific Impacts and Mitigation Measures

<u>Exposure to Noise</u>

The project proposes a noise sensitive use within the vicinity of Highway 1. Per the County Noise Element, 60 dBA is considered the maximum acceptable exterior noise exposure level for residential uses and 45 dBA is the maximum acceptable exposure level for interior uses. Uses within this range will not require mitigation. The eastern boundary of the project site is located approximately 160 feet from the centerline of Highway 1. The topography between the highway and the site consist of generally flat areas to Studio Drive, and then the property slopes down several feet (approximately 5 to 8 feet) from Studio Drive to the beach. According to the County Noise Element contour maps, the 65 dBA range extends from the centerline of the highway 209 feet west. Therefore the easternmost 50 feet of the project site are located within the 65 dBA range, and the remainder is located within the 60 dBA range.

The project has been designed to provide a noise buffer between Highway 1 and the proposed living space. The project proposes a driveway and parking garage on the eastern portion of the site, which are not considered outdoor uses subject to the 60 dBA limit. The living area is also proposed below the grade of the highway by approximately 8 to 10 feet. Because the topography of the subject lot is below the street elevation, the ground will buffer most of the noise from Highway 1, thereby allowing for a minimal impact from noise to the livable areas of the home. In addition, the project would conform to the latest edition of the Uniform Building Code (UBC); normal construction practices in the Code would provide a noise level reduction

of approximately 15 dBA (County of San Luis Obispo 1992), potentially bringing resultant noise levels within the interior 45 dBA threshold.

However, because a portion of the project site is located in an area that currently exceeds Noise Element thresholds, and normal construction practices and natural buffers may be insufficient to bring noise levels within acceptable ranges, some mitigation may be necessary. The County Noise Element recommends the following standardized mitigation measures for reducing interior noise levels in the 60-65 dBA range.

N Impact 1 **Construction of the proposed project would potentially expose people to transportation-related noise levels that exceed the County Noise Element thresholds.**

N/mm-1 *Upon application for building permits, the project applicant shall include in the project design the following standard mitigation measures for interior noise mitigation provided in the Noise Element for levels in the 60-65 dBA range:*

a. Air conditioning or a mechanical ventilation system;

b. Windows and sliding glass doors mounted in low air infiltration rate frames (0.5 cubic feet per minute or less, per American National Standards Institute [ANSI] specifications); and,

c. Solid core exterior doors with perimeter weather stripping and threshold seals.

Residual Impact

These standards, along with compliance to the UBC, would provide a noise reduction level of 20 dBA (County of San Luis Obispo 1992). Implementation of this measure would bring noise levels to acceptable ranges and reduce impacts to a *less than significant* level (Class II).

Generate Increases in the Ambient Noise Level

The project proposes construction of one single-family residence in an existing neighborhood. The project would result in the addition of some vehicle trips on local roads (approximately 9.6 per day), but the traffic noise associated with a single residence is not considered significant. Therefore, the project would not generate significant increases in the ambient noise levels for adjoining areas.

The project would also generate construction-related noise and vibration associated with construction and development of the structure. However, the project does not propose any significant sources of man-made vibration (i.e., sonic booms, blasting, pile driving, pavement breaking, and demolition). Per the County's Land Use Ordinance, §23.06.042d, construction noise between the hours of 7:00 a.m. and 9:00 p.m. on Mondays through Fridays, and 8:00 a.m. and 5:00 p.m. on Saturdays and Sundays, is exempt from control or mitigation. This type of noise is considered a short-term impact and *less than significant* (Class III). Therefore, the project is not expected to expose people to severe noise or vibration, or to result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity.

Severe Noise or Vibration

The proposed project is not located within any airport land use plan or two miles of a public or private airstrip, and would not expose people to excessive noise levels.

4.4.5.6 Cumulative Impacts

Construction activities are not considered cumulatively significant due to their short-term nature, and development of one single-family residence within an existing developed neighborhood would not contribute significantly to existing noise levels. Therefore, no cumulative noise impacts would occur.

4.4.6 Population and Housing

4.4.6.1 Existing Conditions

Cayucos is considered a “bedroom community”, since an estimated 85-90% of its workers commute to jobs in other communities. The growth rate of the Estero planning area was among the highest in the county until the 1980s. Since that time growth has slowed, largely because of building limitations due to concerns about water supply in Cayucos and sewage disposal in Los Osos (County of San Luis Obispo 2009). The population of Cayucos increased from 1,770 to 2,301 between 1970 and 1980, an increase of about 30%. By 1990, the population had increased to 2,960, an increase of about 29%, and has changed little since that time. 2000 U.S. Census data lists the population of Cayucos at 2,943 (County of San Luis Obispo 2009).

Cayucos has a larger proportion of senior citizens than the county as a whole (33.2% compared to 23% countywide). The community also has a generally higher educational level than residents in the county as a whole, with a high percentage of residents age 25 and over holding bachelor’s, master’s, and doctorate degrees. In Cayucos, there is an average of 2.09 persons per household (compared to a county average of 2.66). The housing vacancy rate is also very high in Cayucos, about 38%, compared to approximately 9% in the county as a whole. This is largely due to the high level of seasonal use of housing.

The population of Cayucos is expected to grow to 4,050 by the year 2015 and to 4,530 by the year 2020. Projected build-out of 4,765 is expected to occur in 2022 (County of San Luis Obispo 2009).

The San Luis Obispo Council of Governments (SLOCOG) adopted the Regional Housing Needs Plan for the period of August 31, 2009 to June 30, 2014, which designated 1,295 new housing units for the San Luis Obispo County region. The County of San Luis Obispo was able to identify adequate sites to accommodate the unincorporated County’s share of the regional housing need in the Housing Element (2009-2014). Housing needs were assessed in the Cayucos area, and the Housing Element found that no concerns were identified in relation to roads and sewer and that the water supply was adequate and the mutual water companies do not plan to add to their supply. However, the median home price in Cayucos in late 2008 was $750,000, and residential development is limited. In the Housing Element, the County recommends encouraging development of multi-family housing on the few sites available for new development.

4.4.6.2 Regulatory Setting

California's Housing Element Law (Government Code §65580 through 65589.8) recognized that the availability of housing was of vital statewide importance, and that early attainment of decent housing and a suitable living environment for every Californian is a high state priority. The law was enacted to ensure that counties and cities recognize their responsibilities in contributing to the attainment of state housing goals, to establish the requirement that all counties and cities adopt housing elements to help meet state goals, to recognize that each locality is best capable of determining what efforts it is required to take to contribute to attainment of state housing needs, and to encourage and facilitate cooperation between local governments to address regional housing needs.

The San Luis Obispo County General Plan serves as the County's guide for land use and development. The plan analyzes issues of importance to the community, sets forth policies for conservation and development, and outlines specific programs for implementing these policies. The Housing Element is one of seven mandated elements of the local General Plan. The purpose of the Housing Element is to identify the community's housing needs, state the community's goals and objectives with regard to housing production, rehabilitation and conservation to meet those needs, and define the policies and programs that the community will implement to achieve the stated goals and objectives.

The CPUC regulates intrastate and local natural gas and electrical distribution facilities and services, natural gas procurement, water utilities, pipelines, and production and gathering. Regulations related to natural gas services at the local level include the CBC, California Health and Safety Code, and California Fire Code.

4.4.6.3 Thresholds of Significance

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

- Induce substantial growth in an area either directly or indirectly (e.g., through projects in an undeveloped area or extension of major infrastructure).
- Displace existing housing or people, requiring construction of replacement housing elsewhere.
- Create the need for substantial new housing in the area.
- Use substantial amounts of fuel or energy.

4.4.6.4 Impact Assessment and Methodology

The prediction of population levels and housing and the subsequent estimation of impacts at the project site were conducted through a review of existing resources, including the County Housing Element and Estero Area Plan. Significant impacts would result if the project would induce substantial growth in the area, displace existing housing or create the need for substantial new housing in the area.

4.4.6.5 Project-specific Impacts and Mitigation Measures

Growth Inducement

The project proposes one single-family residence on one of the few remaining undeveloped lots in an existing developed neighborhood, and would therefore, not induce substantial growth in the area.

Displace Housing or People

No existing housing would be displaced as a result of the proposed project and the construction of replacement housing would not be required elsewhere.

Create Need for New Housing

The construction needs of the project would be temporary and likely filled by the local workforce; therefore, no need for substantial new housing in the area would result.

Use of Fuel or Energy

The project would contain a photovoltaic system to support the electricity for the entire house, including 1,400 square feet of solar panels located on the south-facing slopes of the roof. Light tubes would be installed to allow outside light to filter through to the basement. Therefore, the project would not use substantial amounts of fuel or energy. No significant adverse impacts to population or housing would occur as a result of the proposed project, and no mitigation measures are necessary.

4.4.6.6 Cumulative Impacts

The project proposes one single-family residence within a developed residential area and would not create significant impacts on existing housing or population levels. The proposed residential use is consistent with the County's Housing Element and land use designation. Therefore, no cumulatively significant impact would occur.

4.4.7 Public Services and Utilities

4.4.7.1 Existing Conditions

Emergency Protection

The project area is served by the San Luis Obispo County Sheriff's Department and Cayucos Fire Protection District. The Cayucos Fire Station, Station 11, is located at 2250 Chaney Street, approximately one mile southeast of the project site. The Cayucos Fire Station is staffed 24 hours a day with a minimum of one fire captain and one firefighter. During peak fire season, the station is staffed by a crew of four. Response times within the Cayucos Fire Protection District are generally two to three minutes. The closest Sheriff's station, the Coast Station, is located in the community of Los Osos, approximately 12 miles south of the project site. The Coast Station patrols from Avila Beach to San Simeon and from the Pacific Ocean to the Los Padres mountain range. The Sheriff's Office has identified a ratio of one deputy per 750 residents as providing an adequate level of service. For San Luis Obispo County, the ratio in 2002 was roughly one deputy for 1,000 residents (County of San Luis Obispo 2009).

Ambulance services in the Cayucos area are provided by contract with a privately-owned company, San Luis Ambulance, which has stations in Morro Bay and San Luis Obispo to service this planning area. There is no hospital in the Estero planning area. The closest

medical facilities are the privately-owned French Medical Center and Sierra Vista Regional Medical Center, in San Luis Obispo.

Schools

The project is located in the Cayucos Elementary School District and the Coast Unified School District. Cayucos School currently has 14 teachers that serve 208 students in kindergarten through eighth grade (Cayucos Elementary School District 2010). Permanent capacity of the Cayucos Elementary School District is 240 students. While the Estero Area Plan shows over-capacity conditions existing at Cayucos School between 1993 and 2002, the 2010 information provided in the School Accountability Report Card shows the school operating at approximately 87% capacity.

San Luis Coastal Unified School District (SLCUSD) has 15 pre-kindergarten through 12th grade schools with 425 teachers, 320 support staff and 36 management staff serving nearly 7,200 students. Coast Union High School and Leffingwell Continuation High School, both in Cambria, serve the entire North Coast area, including Cayucos. The 2002 high school enrollment was 375 students, including 28 at Leffingwell. Approximately 34% of the high school enrollment is from Cayucos. Enrollment for the 1993 to 2001 period was approximately 65-74% of capacity.

More than two-thirds of the high school classrooms are portable classrooms, many in need of replacement. In 1998, voters within the Coast Union High School attendance area approved a bond measure for construction of 12 new classrooms that will replace many of the older portables.

Roads

The project site will be accessed by Studio Drive and Highway 1. Travel in the area is characterized by high seasonal peaks, as the entire coastal region is a major attraction for tourists during the summer months. Because the City of San Luis Obispo continues to serve as the major employment center, travel demands are heavily concentrated along Highway 1 between Cambria and San Luis Obispo. All major streets in Cayucos, including Studio Drive, are operating at acceptable levels of service (County of San Luis Obispo 2009).

Solid Waste

The project site would be served by Mission Country Disposal. The Cayucos Sanitary District has entered into an exclusive franchise agreement with Mission Country Disposal for collection and disposal of solid waste, as well as the collection, processing and marketing of recyclable materials. The waste is disposed of at the Cold Canyon landfill south of San Luis Obispo. The projected service life of Cold Canyon extends to about 2012. However, the County has undertaken the environmental review process for an expansion of the landfill. The Chicago Grade landfill, east of Templeton, is an alternative disposal site that is expected to reach capacity by about 2024.

Parks

The San Luis Obispo County Parks and Recreation Element (2006) identifies several neighborhood and community parks and special places (natural areas, coastal accessways, historic sites) in Cayucos, including Hardie Park (4 acres), Paul Andrew Park (1 acre), Cayucos Beach (14 acres), and the proposed Norma Rose Park (1.5 acres, undeveloped). The project site lies directly adjacent to State Parks' property associated with the beach and a

parking area providing public vertical access to the beach. The project proposes to provide lateral access across the project parcel to the adjacent beach areas.

The Estero Area Plan estimates that existing facilities are meeting only about 50% of the estimated current need for neighborhood and community park acreage. According to the National Recreation and Park Association recommended guidelines, a community the size of Cayucos needs about 18 acres of neighborhood and community parks. However, while the beach is not a considered a “neighborhood” park, it provides a wealth of recreational opportunities to Cayucos residents not available to most communities. Total recreational acreage in Cayucos, taking into account Cayucos Beach and the proposed Norma Rose Park, exceeds 20 acres.

Water

Water supplies in the Estero planning area consist of surface and sub-surface flow in several coastal streams, the groundwater basins associated with those streams, and Whale Rock Reservoir. Total estimated water supplies currently available to water users within the Estero planning area include about 600 acre-feet per year (afy) from Whale Rock Reservoir, 1,313 afy from the State Water Project in the city of Morro Bay, and 645 afy from the Morro Bay desalination plant.

Whale Rock Reservoir has a storage capacity of 50,000 acre-feet. This capacity is reserved for use by the city of San Luis Obispo, the California Men’s Colony, Cal Poly University, and Cayucos, which has an allocation of 600 afy. Cayucos water customers receive the Whale Rock water through three separate water service districts (County Service Area [CSA] 10, Paso Robles Beach Water Association, and Morro Rock Mutual Water Company), that have collaborated to form the Cayucos Area Water Organization. Water is piped from the reservoir to a water treatment plant and then to the distribution systems of the three purveyors. The project site is within CSA 10, which is allocated 190 afy of the Whale Rock Reservoir supplies.

Over the last 10 years, total water production in the community has remained fairly constant at roughly 400 afy. Water conservation programs have kept Cayucos within its allocation without the need for rationing. To provide sufficient water for the future buildout population, CSA 10A and the Morro Rock View Mutual Water Company are interested in obtaining supplemental water through the Lake Nacimiento Water Project. The total amount of supplemental water being requested is 160 afy (this amount includes supplemental water requested by the Lewis C. Pollard Family Trust for an area on the west end of Cayucos). The actual amount of water needed for buildout will vary depending upon factors such as actual water usage, exact number of vacant parcels, and occupancy rates.

In Cayucos, projected water supply (including 160 afy in connection with the Lake Nacimiento Water Project) would be sufficient to accommodate projected demand at buildout, assuming an increasing percentage of residential occupancy over time (County of San Luis Obispo 2009). Implementation of water conservation measures may also significantly reduce water demand.

Wastewater

Wastewater generated in Cayucos and the City of Morro Bay is collected in a conventional underground community sewer system of laterals and sewer mains for transport to the City of Morro Bay sewage treatment plant. Current plant capacity is 2.06 million gallons per day (mgd; average dry weather flow). In 2006, average dry weather flows were approximately 1.209 mgd

from Morro Bay and 0.283 mgd from Cayucos, for a total of 1.492 mgd (County of San Luis Obispo 2009). Thus, the treatment plant was operating at roughly 72% capacity.

If it is assumed that the amount of wastewater flow has a fairly constant relationship to water demand, future flow can be estimated using estimates of water demand. Using this methodology, Cayucos's average dry weather wastewater flow at buildout would range from about 0.318 mgd to 0.401 mgd, and Morro Bay's projected flows at buildout would be approximately 1.42 mgd, for a total projected flow of 1.738 to 1.821 mgd. Therefore, the treatment plant's existing 2.06 mgd capacity is sufficient to handle the combined projected flows from Morro Bay and Cayucos at buildout. Cayucos would be well within its entitlement to the treatment capacity provided for in a Joint Powers Agreement with the Cayucos Sanitary District, but at buildout, Morro Bay could be close to its entitlement. An upgrade to the treatment plant is planned to be completed by 2015 (County of San Luis Obispo 2009).

4.4.7.2 Regulatory Setting

The County-adopted Public Facilities Fee Ordinance (Title 18 of the County Code) provides for the collection of a fair share amount fee from new development to help mitigate for cumulative impacts on public facilities. The funds collected help fund capital improvement projects, including libraries, fire services, general government, parks and recreation, and sheriff's patrol.

The California Department of Water Resources (CDWR) manages California's water resources. The regulations overseen by CDWR regarding water service availability include the Urban Water Management Planning Act and Senate Bills 221 and 610. Solid waste disposal in California is regulated at the state level by CCR Title 14, Division 7, Chapter 3 (Minimum Standards for Solid Waste Handling and Disposal) and in PRC §40100 et. seq. The California Integrated Waste Management Act (PRC §40000 et seq.) requires municipalities to divert 25% of their solid waste from landfills to recycling facilities by 1995 and 50% of their solid waste by 2000. Government Code §51178 specifies that the Director of California Department of Forestry and Fire Protection shall identify areas in the state as very high fire hazard severity zones based on consistent statewide criteria and based on the severity of fire hazard that is expected to prevail in those areas.

4.4.7.3 Thresholds of Significance

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

- Have an effect upon, or result in the need for new or altered public services in any of the following areas:
    - Fire protection
    - Police protection
    - Schools
    - Roads
    - Solid waste
    - Parks
    - Water
    - Wastewater
    - Other public facilities.

4.4.7.4 Impact Assessment and Methodology

The analysis of public services and utilities and the subsequent estimation of impacts at the project site were conducted through a review of existing resources, including the Estero Area Plan and County General Plan Safety Element. Significant impacts would result if the project would have a significant effect on, or result in the need for new or altered police, fire, school, road, solid waste, park, water, or wastewater facilities.

4.4.7.5 Project-specific Impacts and Mitigation Measures

Effect or Result in the Need for New/Altered Public Services

The proposed project would potentially result in additional demand on public services, including emergency protection, schools, roads, solid waste disposal, parks, water supply and wastewater treatment systems. However, development is limited to one single-family residence and it is not likely that any public service or utility would be significantly impacted by the slight increase in service demand. The project applicant would pay all applicable school and public facility fees.

The proposed project is not located within a high fire severity zone, and response times are generally two to three minutes. Although the Cayucos Fire Protection District and County Sheriff's Office are considered understaffed for the populations they serve, the addition of a single residence within an existing neighborhood would not have a significant effect upon fire or police protection, and no new or altered emergency services would be required. Area schools, roads and parks are operating at acceptable levels of service, and the project will be served by private solid waste disposal, water, and wastewater systems, all of which have sufficient capacity to accommodate the proposed residential use. Therefore, no significant impact on these services would result from the project.

All stormwater would be handled onsite, either collected and used as gray water for toilet flushing and landscaping or directed westward onto the beach. Therefore, no new stormwater drainage facilities or expansion of existing facilities would be required. County landfills have sufficient permitted capacity to accommodate the small increase in solid waste resulting from the proposed project. Applicable water service providers and wastewater treatment facilities are capable of supporting the proposed development and no new entitlements, new facilities or expansion of existing facilities would be required. The project would comply with all statutes and regulations related to solid waste. The project would not adversely affect a community water service provider or community wastewater service provider.

Wastewater

The project would connect to the existing sewer system managed by the Cayucos Sanitary District, and would not require an onsite system subject to the Central Coast Basin Plan. The Cayucos Sanitary District is currently operating at acceptable levels and can accommodate the proposed project (one residence).

No significant adverse impacts would occur as a result of the proposed project, and no mitigation measures are necessary.

4.4.7.6 Cumulative Impacts

As with any new residential development, the project will have a cumulative effect on police and fire protection, as well as add demand on public schools, roads, waste disposal, and water

and wastewater systems. However, the project's cumulative impacts are within the general assumptions of allowed use for the subject property. Adequate public facility and school fee programs have been adopted to address these impacts. Impacts to the area schools, roads, and service systems will be mitigated through the payment of appropriate fees prior to issuance of a building permit for the proposed project.

4.4.8 Recreation

4.4.8.1 Existing Conditions

There are roughly 23 parks, three golf courses, and eight "special places" operated by County Parks. Urban Regional Parks account for 644 acres, Rural Regional Parks for 11,398 acres, and mini, neighborhood, and community parks for 214 acres (County of San Luis Obispo 2006). The Cayucos area is served by approximately 20.5 acres of total park lands, including Hardie Park (4 acres), Paul Andrew Park (1 acre), Cayucos Beach (14 acres), and the proposed Norma Rose Park (1.5 acres, undeveloped). In addition, parks are also provided by state and federal agencies. These parks tend to be passive in nature, and provide important areas for nature appreciation and coastal access. Morro Bay Golf Course, Dairy Creek Golf Course, and El Chorro Regional Park are all located entirely or partially within the Estero planning area.

The project site lies directly adjacent to State Parks' property associated with the beach and a parking area providing public vertical access to the beach. Therefore, coastal access is provided adjacent to the project site; the project proposes to provide lateral access across the project parcel to the adjacent beach areas. The County Trails Plan does not show that the California Coastal Trail is within the vicinity of the proposed project.

The County is also in the process of planning a new dedicated bikeway and pedestrian connector path from Cloisters Park in northern Morro Bay to the future site of the Norma Rose Park in Cayucos. This path would extend along Studio Drive and one northern terminus would be located at the coastal access point and parking lot just north of the proposed project site. According to the County's Bikeway Plan, Studio Drive is an existing Class III bikeway, although it is not currently signed as such. The connector path project would formalize the parking north of the proposed project site by adding striping and would include a signage plan for identifying the bikeway.

The Estero Area Plan estimates that existing facilities are meeting only about 50% of the estimated current need for neighborhood and community park acreage in Cayucos. In particular, Cayucos needs more opportunities for "active" recreation, such as ballparks, children's play equipment, recreational programs, etc. Application of 1983 National Recreation and Park Association Standards refers to a national standard of 5 to 8 acres of community parkland per 1,000 residents. However, the San Luis Obispo County 2006 Public Facilities Fee Financing Plan indicates that the County is providing less than 2 acres of neighborhood and community parkland per 1,000 residents. The County Parks and Recreation Element identifies a reasonable goal for the near future to achieve a minimum of 3 acres of such parkland per 1,000 residents in each of the County's unincorporated communities. Currently, there are approximately 1.7 acres of parkland per 1,000 residents in Cayucos (this number increases to 2.2 acres if the proposed Norma Rose Park is included). These calculations increase to over 6.9 acres per 1,000 residents (or 4.3 acres per 1,000 residents at buildout population) if Cayucos Beach is included, which, although not a typical "community" park, provides substantial recreational opportunities in immediate proximity for residents of Cayucos. In addition, the Estero Area Plan includes a policy to explore ways to finance expansion of the

Veteran's Memorial Building for multiple purposes, such as recreation, public assembly, and the arts.

4.4.8.2 Regulatory Setting

In San Luis Obispo County, standard development fees include Public Facility Fees. These fees are assessed on new residential development. Quimby fees are collected when new residential lots are created through a subdivision, and can only be used to expand, acquire, rehabilitate, or develop community-serving parks. Public Facility Fees are collected upon construction of a new residential unit, and these fees can only be used to expand, acquire, or develop community-serving parks.

4.4.8.3 Thresholds of Significance

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

- Increase the use or demand for parks or other recreation opportunities.
- Affect the access to trails, parks or other recreational opportunities.

4.4.8.4 Impact Assessment and Methodology

The analysis of recreational resources and the subsequent estimation of impacts at the project site were conducted through a review of existing resources, including the County General Plan Parks and Recreation Element, County Bikeways Plan, and County Trails Plan. Significant impacts would result if the project would affect onsite or nearby recreational resources, or increase the use or demand for parks and recreation opportunities.

4.4.8.5 Project-specific Impacts and Mitigation Measures

<u>Increase Use of Recreational Resources</u>

The project proposes the development of one single-family residence in an existing developed residential area, and would not create a significant increase in the use or demand of recreational areas or facilities. The project applicant will pay all applicable public facility fees to address increased demand on area recreational facilities. Therefore, potential impacts would be *less than significant* (Class III).

<u>Affect Access to Recreation</u>

Beach access is provided directly adjacent to the project site, and lateral access would be provided on the sandy portion of the lot. Access to trails, parks or other recreational opportunities would not be impacted by the proposed development. The future Morro Bay to Cayucos connector bike path would be located along Studio Drive, and development of the project would not affect this project, because it is limited to the existing residential parcel boundaries. The project does not include any components for the development of recreational facilities that may have an adverse physical effect on the environment. No significant adverse impacts would occur as a result of the proposed project, and no mitigation measures are necessary.

4.4.8.6 Cumulative Impacts

As with any new residential development, the project has the potential to result in a cumulative effect on recreational resources, by adding demand on public parks, trails, and recreational areas. However, the project's cumulative impacts are within the general assumptions of allowed use for the subject property. Adequate public facility fee programs have been adopted to address these impacts. Impacts to the area recreational resources and facilities will be mitigated through the payment of appropriate fees prior to issuance of a building permit for the proposed project. The future Morro Bay to Cayucos connector bike path is proposed to run along Studio Drive directly adjacent to the project site, which will create a *beneficial impact* (Class IV) on recreational resources by providing additional pedestrian and biking trails in the project vicinity and connecting other recreational opportunities in the city of Morro Bay and community of Cayucos.

4.4.9 Transportation and Circulation

4.4.9.1 Existing Conditions

The project site is served by the un-signalized intersection at Studio Drive and Highway 1. Therefore, the circulation system relevant to the proposed project consists of Highway 1 and Studio Drive in Cayucos. Highway 1 is a principle arterial street within the jurisdiction of Caltrans. It has been officially designated as a State Scenic Highway by the California Scenic Highway Mapping System, the only road so designated in the County (Caltrans 2011). Studio Drive is a collector street under the County's jurisdiction. Road classifications are generally defined as follows in the County Transportation Element:

- Principal Arterial Streets: interstate thoroughfares connecting major population centers; carry high traffic volumes of long trip lengths.
- Arterial Streets: continuation of intercommunity links within urban areas providing high level of service.
- Collector Streets: channel traffic from local streets to arterials; penetrate identifiable neighborhoods.
- Local Streets: directly serve residential uses and businesses; channel traffic to collector and arterial streets; handle only limited traffic.

Based on an analysis of roadway capacities, the Estero Area Plan Circulation Element indicated that all major streets in Cayucos currently operate at acceptable levels of service. The Estero Area Plan Circulation Element identifies deficiencies along Highway 1 related to limited passing opportunities along the two-lane portion of the highway just north of Cayucos. This section is required by statute to remain as a two-lane, scenic route. Other identified deficiencies were based on public opinion and related to narrow streets and a lack of parking on busy holidays and weekends. However, no improvements are recommended for Highway 1 or any collector streets in Cayucos in the Estero Area Plan Circulation Element.

Highway 1 received recognition as one of the nation's premiere roadways in 2003 when it was designated as an "All-American Road" by the FHWA's National Scenic Byway's Program. The designation, received by only 27 roads, is the highest scenic highway designation in the country (SLOCOG 2010). The Circulation Element estimates a marginal level of service along Highway 1 in the future; however, no serious capacity deficiencies are predicted.

The County Bikeways Plan states that, as of 2001, the County Bikeways Ordinance includes 82 miles of Class I and Class II bikeways, and the County also has 33.9 miles of Class III bikeways installed. The current bicycle network in the vicinity of the project site includes a mix of Class II and Class III bikeways. Several Cayucos roads have been designated as bikeways in the San Luis Obispo County Bikeways Plan (2010), including portions of Studio Drive (Class III). Highway 1 is designated as a "suggested route". The Morro Bay to Cayucos connector bike path proposes additional Class I, II, and III bikeways along this area.

4.4.9.2 Regulatory Setting

Transportation system requirements for unincorporated areas of the County are subject to the policies and plans of the County Department of Public Works. They outline policies and standards regarding use of public roads in the Circulation Element of the County's General Plan. The policies and standards provide guidance in defining whether proposed projects are consistent with established roadway capacity levels and intersection levels of service (LOS), and where transportation improvement projects are needed to address new development.

The applicable County regulations and standards for future development can be found in the County Circulation Element of the General Plan, SLOCOG Regional Transportation Plan, Local Coastal Plan (Estero Area Plan), and CZLUO.

4.4.9.3 Thresholds of Significance

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

- Increase vehicle trips to local or areawide circulation system.
- Reduce existing "Levels of Service" on public roadways.
- Create unsafe conditions on public roadways (e.g., limited access, design features, sight distance, slow vehicles).
- Fail to provide for adequate emergency access.
- Result in inadequate parking capacity.
- Result in inadequate internal traffic circulation.
- Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., pedestrian access, bus turnouts, bicycle racks, etc.).
- Result in a change in air traffic patterns that may result in substantial safety risks.

4.4.9.4 Impact Assessment and Methodology

The impact assessment is based on existing traffic, circulation and parking data, and anticipated increased use of transportation facilities as a result of the proposed project. Existing levels of service were qualified based on applicable county and regional plans and reports, and a significant increase in area traffic is not anticipated as a result of the proposed project. Neighborhood, pedestrian and bicycle-related impacts were assessed by identifying neighborhood areas and facilities currently affected by visitor use and determining the need for additional facilities or services.

4.4.9.5 Project-specific Impacts and Mitigation Measures

Increase Vehicle Trips / Level of Service

The project proposes one single-family residence within an existing residential area with all roads operating at acceptable levels. While the project would add trips to the local circulation system (approximately 9.6 per day), all roads in the area are operating at acceptable levels and are capable of accommodating the small increase in trips. A referral was sent to the County Department of Public Works requesting their review of the project. They had no comments related to traffic concerns associated with the proposed project other than that an encroachment permit would be required for the new driveway. Therefore, no significant increase to local or areawide circulation systems is anticipated, and potential impacts would be *less than significant* (Class III).

Unsafe Conditions

The project includes a private driveway, which would connect to Studio Drive. Based on review by the County Department of Public Works, a standard Encroachment Permit will be required. The project does not include any features that would result in unsafe traffic conditions; therefore, potential impacts would be *less than significant* (Class III).

Emergency Access

The project consists of a single-family residence on an existing lot. The site is accessible to emergency services by Studio Drive, which connects to Highway 1, and occupants have clear access out of the area. Potential impacts related to emergency access would be *less than significant* (Class III).

Parking Capacity

Sufficient parking for the proposed residential development is proposed at the project site, including a private driveway, carport, and garage. Therefore, potential impacts related to parking capacity would *be less than significant* (Class III).

Internal Traffic Circulation

The project is a single-family residence; therefore this threshold does not apply and no impact would occur.

Alternative Transportation Policies, Plans, and Programs

Transportation and circulation policies relevant to the proposed project exist in local and state documents. These documents generally encourage the development of alternative transportation as a means to reduce traffic congestion and increase safety, among other things. The policy documents reviewed as part of this EIR section include the County's Estero Area Plan and Bikeways Plan. The proposed project is *consistent* with these plans because it consists of a single-family residence located within an existing residential neighborhood, with access to pedestrian and bicycle paths.

Air Traffic Patterns

The project is not located within two miles of a public or private airport or airstrip, and is not located at an elevation that would affect air traffic patterns. Modern solar panel technology incorporates anti-glare coatings that absorb, rather than reflect, sunlight. Therefore, the project would not affect air traffic, and potential impacts would be *less than significant* (Class III).

4.4.9.6 Cumulative Impacts

Population and tourism in the areas surrounding the proposed project are expected to slowly and steadily increase in the future, resulting in a corresponding steady increase in traffic, parking demands, and safety conflicts in the Cayucos area. The proposed project would contribute to cumulative traffic volumes in the area; however, because it is not resulting in an increase in residential density, the increase would be minor, and at a level anticipated in by the Estero Area Circulation Element. Therefore, potential cumulative impacts would be *less than significant* (Class III).

4.4.10 Water

4.4.10.1 Existing Conditions

Water Supply

Cayucos obtains its water from Whale Rock Reservoir located east of Highway 1 and the community. Cayucos is served by three small water purveyors: the Morro Rock Mutual Water Company (MRMWC), the Paso Robles Beach Water Association (PRBWA), and CSA 10A. The three water purveyors rely on an approximately 600-acre-foot entitlement from Whale Rock reservoir. The project site is served by CSA 10A, which receives an additional 25 acre-feet of water from the Lake Nacimiento Water Project. Total water use in Cayucos ranged from 403-431afy between the year 2000 to 2010 (County of San Luis Obispo 2011). Out of this, CSA 10A used 122 to 134 afy during this timeframe. Based on the County's Resource Management System *Annual Summary Report* for 2009-2010, there is an identified level of severity for water supply, indicating that the available supply is able to meet the demand.

Water Quality

The project site is located on the west side of Studio Drive, immediately east of the Pacific Ocean. Old Creek is located approximately 600 feet to the northwest.

4.4.10.2 Regulatory Setting

Federal Policies and Regulations

The Clean Water Act controls the discharge of toxic material into surface water bodies. Under this act, states are required to identify water segments impaired by pollutants and develop control strategy/management plans to reduce pollution and meet certain water quality standards.

Regulatory protection for water resources throughout the United States is under the jurisdiction of the USACE. Section 404 of the Clean Water Act prohibits the discharge of dredged or fill material into "waters of the U.S." without formal consent from the USACE. Waters of the U.S. include marine waters, tidal areas, stream channels, and associated wetlands. Wetlands include freshwater marshes, vernal pools, freshwater seeps, and riparian areas. Under Section 404, activities in waters of the U.S. may be subject to either an individual permit or a general permit, or may be exempt from regulatory requirements. Some activities have been given blanket authorization under the provisions of a general permit through the Nationwide Permit system. Individual Permits require the applicant to prepare and submit an alternatives analysis of the project.

Section 401 of the Clean Water Act and its provisions ensure that federally permitted activities comply with the federal Clean Water Act and state water quality laws. Section 401 is

implemented through a review process conducted by the RWQCB, and is usually triggered by the Section 404 permitting process. Specifically, the RWQCB certifies via Section 401 that the proposed project complies with applicable effluent limitations, water quality standards, and other conditions of California law. If the RWQCB denies certification, the lead federal agency must deny the federal permit application.

State Policies and Regulations

The establishment and enforcement of water quality standards for the discharge into and maintenance of water throughout California is managed by the SWRCB and its RWQCBs. The SWRCB enforces the federal Clean Water Act on behalf of the EPA. Most of the quantitative objectives are based on the CCR, Title 22 – State Drinking Water Standards. Other considerations include the Porter-Cologne Water Quality Control Act, and the RWQCB's Non-degradation Policy. San Luis Obispo County lies entirely within Region 3, the Central Coast RWQCB. The RWQCB is the primary State agency ensuring that the quality of potable water supplies is protected from harmful effects by man.

The California Department of Health Services (DHS) is responsible for overseeing the quality of water once it is in storage and distribution systems. DHS oversees the self-monitoring and reporting program implemented by all water purveyors, performs inspections, and assists with financing water system improvements for the purpose of providing safer and more reliable service.

Section 10910 of the California Water Code (CWC) requires the County to identify the agency or entity responsible for providing water service to the area and to request that the agency determine whether the project was included within the current Urban Water Management Plan maintained by that water agency.

Section 13260(a) of the CWC requires that any person discharging waste or proposing to discharge waste within any region, other than to a community sewer system, that could affect the quality of the waters of the State, file a Waste Discharge Report (WDR). All WDRs must implement the applicable water quality control plan (Basin Plan) for the Region affected by the discharge. Therefore, WDRs require the project to comply with all applicable Basin Plan provisions, including any prohibitions and water quality objectives, governing the discharge. The siting, design, construction, operation, maintenance, and monitoring of all small domestic systems must comply with all of the applicable provisions of the RWQCB's Basin Plan. The project shall not discharge waste in excess of the maximum design and disposal capacity of the small domestic system. The discharger must comply with any more stringent standards in the Basin Plan. In the event of a conflict between the provisions of RWQCB Order No. 97-10-DWQ and the Basin Plan, the more stringent provision prevails.

The Porter-Cologne Water Quality Control Act provides the authority and method for the State of California to implement its water management program. The act establishes waste discharge requirements for both point and non-point source discharges affecting surface water and groundwater.

CDFW is responsible for conserving, protecting, and managing California's fish, wildlife, and native plant resources. California law requires any person, agency, or public utility proposing a project that may impact a river, stream, or lake to notify the CDFW before beginning the project. If the CDFW determines that the project may adversely affect existing fish and wildlife resources, a Lake or Streambed Alteration Agreement is required. This Agreement lists the

CDFW conditions of approval for the proposed project, and serves as an agreement between applicants and the CDFW.

SBx7-7 (SB 7) was enacted in November 2009, requiring all water suppliers to increase water use efficiency (CDWR 2011). The bill also requires, among other things, that the CDWR, in consultation with other state agencies, develop a single standardized water use reporting form, which would be used by both urban and agricultural water agencies. The legislation sets an overall goal of reducing per capita urban water use by 20% by December 31, 2020. The state shall make incremental progress towards this goal by reducing per capita water use by at least 10% by December 31, 2015.

- Each urban retail water supplier shall develop water use targets and an interim water use target by July 1, 2011.
- An urban retail water supplier shall include in its water management plan due July 2011 the baseline daily per capita water use, water use target, interim water use target, and compliance daily per capita water use. CDWR, through a public process and in consultation with the California Urban Water Conservation Council, shall develop technical methodologies and criteria for the consistent implementation of this part
- CDWR shall adopt regulations for implementation of the provisions relating to process water.
- A Commercial, Institutional, Industrial (CII) task force is to be established that will develop and implement urban best management practices for statewide water savings.
- Effective 2016, urban retail water suppliers who do not meet the water conservation requirements established by this bill are not eligible for state water grants or loans.

Local Policies and Regulations

Chapter 5 of the County CZLUO (Title 23 of the County Code) contains site development standards for the county, including drainage, grading, erosion, and sedimentation control. Section 23.05.020 states that the County's standards for grading and excavation are intended to minimize hazards to life and property, protect against erosion and the sedimentation of water courses, and to protect the safety, use, and stability of public rights of way and drainage channels.

Erosion and sedimentation control to protect damaging effects on-site and on adjoining properties is discussed in §23.05.036 of the CZLUO. A sedimentation and erosion control plan would be required for future developments, and shall include temporary and final measures including:

- Slope surface stabilization including temporary mulching or other stabilization measures to protect exposed areas of high erosion potential during construction and interceptors and diversions at the top of slopes to redirect runoff;
- Erosion and sedimentation control devices such as absorbing structures or devices to reduce the velocity of runoff;
- Final erosion control measures including mechanical or vegetative measures.

Section 23.05.040 of the CZLUO states that standards for the control of drainage and drainage facilities are designed to minimize harmful effects of stormwater runoff and resulting inundation and erosion on proposed projects, and to protect neighboring and downstream properties from drainage problems resulting from new development.

4.4.10.3 Thresholds of Significance

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

- Violate any water quality standards.
- Discharge into surface waters or otherwise alter surface water quality (e.g., turbidity, temperature, dissolved oxygen, etc.).
- Change the quality of surface or groundwater (e.g., saltwater intrusion, nitrogen-loading, daylighting, etc.).
- Change the quantity or movement of available surface or groundwater.
- Adversely affect community water service provider.

4.4.10.4 Impact Assessment and Methodology

Significant water supply and infrastructure impacts would occur if the demands placed on the area from this development exceeded the available water supply. Regarding water quality, an impact would occur if the proposed project results in the discharge of pollutants into surface waters, including the Pacific Ocean. Impacts to the movement of water may occur if the project would affect stormwater runoff, including existing County drainage infrastructure, resulting in flooding, erosion, and sedimentation. Potential impacts are assessed based on site topography, the proposed layout and elevations of potential project components, the erodibility of soils, existing drainage patterns, and the regulatory framework applicable to the project.

4.4.10.5 Project-specific Impacts and Mitigation Measures

<u>Violate Water Quality Standards / Discharge into Surface Waters</u>

The Clean Water Act has established a regulatory system for the management of storm water discharges from construction, industrial and municipal sources. The SWRCB has adopted a NPDES Storm Water General Permit, which requires the implementation of a SWPPP for discharges regulated under the SWRCB program. Currently, construction sites of 1 acre and greater may need to prepare and implement a SWPPP that focuses on controlling storm water runoff. The RWQCB, the local extension of the SWRCB, currently monitors these SWPPPs. Based on review by the RWQCB, the applicant will be required to obtain a stormwater construction permit due to the project's proximity to surface waters (Pacific Ocean).

Proposed grading activities would disturb soil and sand, and potentially result in off-site sedimentation. Standard erosion and sedimentation control measures would be required, including staking or flagging the development footprint; use of fiber rolls and silt fencing to retain soil and sand on-site; covering soil stockpiles; and restoration and revegetation of

disturbed soils. Implementation of these measures would ensure avoidance of adverse effects to water quality.

The project includes removal of the existing County storm drain, and construction of a new storm water management system, including an inlet with a filter and outlet with energy dissipaters. Stormwater would continue to flow onto the beach area to the northwest. Discharge of sediment, hydrocarbons, and other pollutants from the roadway into stormwater and drainage infrastructure (which eventually discharge into surface waters) would affect water quality. Implementation of BMPs and Low Impact Design (LID) techniques consistent with CZLUO §23.05.050.e(1) (Water Runoff, Best Management Practices – Residential development) would avoid or minimize the project's contribution to water quality issues affecting the Pacific Ocean. Additional mitigation is included under the Biological Resources analysis, including BR/mm-5 (stockpile and staging areas, management of hazardous materials, and implementation of BMPs) and BR/mm-6 (erosion and sedimentation control). In addition, an environmental monitor would be present to verify and document compliance with mitigation measures related to the protection of biological resources, including aquatic habitat and surface waters (BR/mm-1).

The project includes a preliminary drainage plan, which has been reviewed and approved by the County Department of Public Works. In the long-term, the project would not result in any significant impacts to water quality, because the proposed stormwater system includes energy dissipaters that would allow stormwater to continue flowing onto the beach in a non-erosive manner.

WAT Impact 1 **The project would include construction activities that would require ground disturbance and use of heavy equipment, which may result in the discharge of sediment and other pollutants, potentially affecting surface water quality.**

WAT/mm-1 *Upon application for construction permits, the applicant shall submit grading and construction plans showing BMPs, and shall implement BMPs during grading and construction activities. BMPs shall include, but not be limited to, the following:*

a. Erosion control barriers shall be applied, such as silt fences, hay bales, drain inlet protection, and gravel bags;

b. Disturbed areas shall be stabilized with vegetation or hard surface treatments upon completion of construction in any specific area.

c. All inactive disturbed soil areas are required to be stabilized with both sediment and temporary erosion control prior to the onset of the rainy season (October 15 to April 15).

WAT/mm-2 *Prior to issuance of grading and construction permits, the applicant shall submit a copy of the RWQCB-issued stormwater construction permit. The permit shall be on-site during all major grading and construction activities.*

Implement BR/mm-1, BR/mm-5, and BR/mm-6.

Residual Impact

Vegetation removal and ground disturbance prior to or during a rain event creates the potential for erosion and down-gradient sedimentation. Proper planning and implementation of BMPs reduces the potential for off-site transport of sediments and other pollutants that may affect water quality, either directly or indirectly. Based on implementation of mitigation measures, potential construction-related impacts to water quality would be *less than significant with mitigation* (Class II), and no significant long-term impacts would occur.

Change the Quality of Groundwater

The project site is not located in an area where development would affect the quality of groundwater resources; therefore, no impact would occur.

Change the Quantity or Movement of Surface or Groundwater

The project would not create a demand of water exceeding the capacity of the water service provider, and would not require a significant level of additional groundwater pumping by the provider to serve the project. Therefore, the project would not change the quantity or movement of groundwater.

As noted above, the project includes improvements to the existing stormwater drain onsite. The project has been reviewed by the County Department of Public Works, and the proposed plan has been approved at a preliminary level by County staff. Stormwater currently flows into a County drain, and onto the beach via the stormwater system or surface flow. The proposed system would direct water through the project site and onto the beach. Energy dissipaters are included to slow down storm water flow and minimize the potential for erosion at the outlet. Based on the proposed plan, and compliance with existing regulations identified in the County CZLUO, potential impacts would be *less than significant* (Class III).

Adversely Affect Community Water Service Provider

Long-term use of a single-family residence is expected to require approximately 0.270 afy, or 4,375.8 gallons/month (City of Santa Barbara 1989; County of San Luis Obispo 2011). As noted above, the project would be served by CSA 10A, which has adequate water supply to serve the project. A preliminary will-serve letter was issued for the project in 2006. Therefore, potential impacts would be *less than significant* (Class III).

4.4.10.6 Cumulative Impacts

Water demand for the proposed use represents a small percentage of total water demand in the Cayucos area, and the boundaries of CSA 10A (approximately 0.6%). As previously discussed, CSA 10A has available water to serve this project, in addition to others within the service area. Therefore, potential cumulative impacts would be *less than significant* (Class III).

4.4.11 Land Use

4.4.11.1 Existing Conditions

The proposed project is located within the community of Cayucos in the unincorporated area of San Luis Obispo County. The project site consists of one approximately 0.34-acre parcel in the RSF land use category and the Estero planning area. All of portions of the project site are within the Coastal Zone, County GSA – Landslide Risk, County Tsunami Inundation Area, and

County Supervisorial District 2. The GSA is applied to areas within the urban or village reserve lines subject to “moderately high to high” landslide risk or liquefaction potential.

A beach access point and public parking area for approximately 30 vehicles is located approximately 300 feet north of the project site. Other adjacent County land use categories and uses are listed in Table 4.4-4, below.

Table 4.4-4. Surrounding Land Use Categories/Uses

Direction	Land Use Category	Existing Land Use
North	Recreation	Undeveloped State Park land associated with Cayucos Beach
South	Residential Single Family	Large single-family beachfront residences on small lots along Studio Drive
East	Unclassified	Highway 1 right-of-way under Caltrans’s jurisdiction
	Residential Multi Family	Single-family and multi-family residences on small lots along Ocean Blvd.
West	Recreation	Undeveloped State Park land associated with Cayucos Beach

Source: San Luis Obispo County Department of Planning and Building, Interactive GIS Mapping System

4.4.11.2 Regulatory Setting

The proposed project is located in the California Coastal Zone and County of San Luis Obispo jurisdictions. Development of the project would require compliance with the CCA and Local Coastal Plan, County CZLUO and Combining Designation Standards, Estero Area Plan, County of San Luis Obispo General Plan, Central Coast Basin Plan, and San Luis Obispo County CAP. These plans, as well as relevant policies and guidelines applicable to the proposed project, are discussed in Chapter 3, Environmental Setting.

4.4.11.3 Thresholds of Significance

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

- 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.
- Be potentially inconsistent with any habitat or community conservation plan.
- Be potentially inconsistent with adopted agency environmental plans or policies with jurisdiction over the project.
- Be potentially inconsistent with surrounding land uses.
- Physically divide an established community.

4.4.11.4 Impact Assessment and Methodology

The impact assessment in the Land Use section is conducted qualitatively. The potential impacts resulting from implementation of the proposed project were analyzed against the proposed policies whose purpose it is to avoid or minimize those impacts, using the thresholds listed above.

4.4.11.5 Project-specific Impacts and Mitigation Measures

Plan Consistency

The proposed project was reviewed for consistency with policy and regulatory documents relating to the environment and appropriate land use. Referrals were made to outside agencies to review for policy consistencies (i.e., Cayucos Fire Department, SLOAPCD, Central Coast RWQCB, etc.). The project was found to be generally consistent with relevant plans and policies, including the Cayucos Small Scale Neighborhood design standards of the Estero Area Plan (refer to Chapter 3, Environmental Setting).

Habitat, Community Conservation, and Environmental Plans

The project is not proposed within or adjacent to a Habitat Conservation Plan area or inconsistent with any adopted agency environmental plans with jurisdiction over the project.

Consistency with Surrounding Land Uses

The project proposes residential uses within an existing neighborhood. As discussed further in Section 4.1, Aesthetic Resources, the design of the project is modern and includes a cantilevered deck. This type of design is not uncommon in Cayucos beachfront residential areas, which consists of a mix of styles, ranging from modern to classic beach bungalow. The long-term use of the site is consistent with the residential neighborhood.

Divide Established Community

The proposed development would not divide an established community, because it is located within an existing residential lot.

No significant adverse impacts would occur as a result of the proposed project, and no mitigation measures are necessary.

4.4.11.6 Cumulative Impacts

The project proposes one single-family residential use within an existing developed neighborhood and is consistent with surrounding land uses. The project is consistent with the general level of development anticipated for this parcel and within the Studio Drive neighborhood. The project would not contribute to any land use effects and no cumulative impacts would occur.