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SCH # 2018061064

Beechwood Specific Plan, General Plan Amendment and Rezoning

City of El Paso de Robles
1000 Spring Street
Paso Robles, California 93446

187 Tank Farm Road Suite 230
San Luis Obispo CA, 93401
805.781.9800
Principle: LINDSAY CORICA ASLA
A. Introduction

1. Relationship of Final EIR to Draft EIR
The Final EIR is comprised of the Draft EIR (DEIR) for the Beechwood Specific Plan published March 2020 and this Response to Comments Volume. Pursuant to the CEQA Guidelines section 15088, the Lead Agency (City of Paso Robles) must evaluate comments on environmental issues received from persons who reviewed the Draft EIR and prepare a written response. This volume includes all the comment letters received with responses to these comments in Section B following. The Office of Planning and Research State Clearinghouse date for the close of the 45-day comment period was April 24, 2020.

Where the commenter’s position is at variance with the Lead Agency’s position set forth in the DEIR, consistent with CEQA, the responses to comments describe reasons why specific comments or suggestions were not accepted.

The CEQA Guidelines section 15088 states responses to comments may take the form of a revision to the draft EIR or may be a separate section in the Final EIR. The final EIR includes all the pages of the DEIR that have been changed in response to comments received and further information available.

Pursuant to the CEQA Guidelines section 15097, Appendix B of the FEIR contains the Mitigation Monitoring Plan for the CSWP.

2. Summary of changes to the Draft EIR

Additional clarifying text has been added to Air Quality Mitigation AG-2(a) measure to respond to public and neighbors about concerns of ongoing construction dust.

Beechwood received nineteen comment letters from the following entities:

<table>
<thead>
<tr>
<th>Letter No. and Commenter</th>
<th>Public Comments</th>
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<td>1. Lynn Crawford</td>
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<td>2. David Atchinson</td>
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<td>16. SLO County Air Pollution Control District</td>
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<td>17. Caltrans District 5</td>
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BEECHWOOD SPECIFIC PLAN FINAL EIR
The response to these comments, minor changes, clarifications and additions has been made to the DEIR as shown on the following pages. Deleted text has a strike through and added text is underlined.
B. Response to Comments

The following pages include the comment letters revived with each comment identified by a number, followed on the next page by responses to each numbered comment.
1. Response to Comments

This section includes responses to comments received during the circulation of the Draft Environmental Impact Report (Draft EIR) prepared for the Beechwood Specific Plan (project).

The Draft EIR was circulated for a 45-day public review period that began on March 11, 2020 and ended on April 24, 2020.

The City of Paso Robles received 19 comment letters on the Draft EIR. The commenters and the page number on which each commenter’s letter appear are listed in Table VII-1.

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<th>Letter No. and Commenter</th>
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<td>Public Comments</td>
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<td>1. Lynn Crawford</td>
<td>VII. 8-9</td>
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<td>2. David Atchinson</td>
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<td>3. Crossland</td>
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<td>17. Caltrans District 5</td>
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<td>18. California Highway Patrol</td>
<td>VII. 64-67</td>
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<tr>
<td>19. Paso Robles School District</td>
<td>VII. 68-80</td>
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The comment letters and responses follow. The comment letters have been numbered sequentially, and each separate issue raised by the commenter, if more than one, has been assigned a number. The responses to each comment identify first the number of the comment letter.
2. Master Responses

Master Response 1 – Water Supply

Multiple commenters expressed concerns regarding water availability in the region and state that there is not an adequate supply of water to serve the project. Specific topics raised by commenters include the potential to strain existing water resources, the potential for future droughts that could further limit available water resources, groundwater becoming an unreliable source of water supply, and the need to ensure availability of water for existing residents.

The project’s potential impacts to the City’s water supply are discussed in Section IV. K, Water Supply and Wastewater Capacity. The water supply discussion is based on the Water Supply Analysis (WSA) prepared for the project by Todd Groundwater in August 2019, which follows the Draft EIR in Appendix F. The WSA was prepared in accordance with the City’s Rules and Regulations for implementing projects subject to the California Environmental Quality Act (CEQA). The primary purpose of the WSA is to provide an independent evaluation of the Project’s water needs and impacts on City water supplies. It documents Specific Plan water demand and provides information to verify that the City has sufficient water supply to meet future water demands within the Project area and within the City’s water supply service area under normal and dry hydrologic conditions for the next 20 years. As discussed in Section IV. K.2, the City’s existing water-supply portfolio includes the Paso Robles Groundwater Basin, Salinas River water, and entitlements for up to 6,488 acre-feet per year (AFY) of Lake Nacimiento water. Table IV. K-1 shows water supply and demand projections through 2045 from the City’s Urban Water Management Plan (UWMP). Water demand projections in the 2015 UWMP were developed using representative water demand factors, anticipated future conservation, and City General Plan growth assumptions and build out conditions. As discussed in the WSA, development of the Specific Plan area with 911 dwelling units is consistent with the General Plan growth projections that were evaluated in the UWMP.

As shown in Table IV. K-1, sufficient water supply is available to serve the City under normal and drought conditions through the year 2045. In drought years, Lake Nacimiento water can be used to augment surface water and improve water supply reliability. In addition, Lake Nacimiento water can be routed into the Salinas River channel, which recharges the river wells and allows them to operate when native supplies are low. In 2014, the City completed a Recycled Water Master Plan update (AECOM, 2014) that identified potential recycled water customers, estimated recycled water quality and blending needs, identified recycled water distribution system possibilities, and developed preliminary cost options for future use of recycled water enhance the City’s resilience during drought conditions.

The Paso Robles Groundwater Basin is designated as “critically overdrafted” under the Sustainable Groundwater Management Act (SGMA), as discussed in the WSA in Appendix J. A Groundwater Sustainability Plan (GSP) for the Paso Robles Groundwater Basin was adopted by the City Council on December 17, 2019 in order to lead to the sustainable management of the Groundwater Basin by 2040. The City was an active party in the development of the GSP for the Groundwater Basin. SGMA regulation is intended to guide the Paso Robles Groundwater Basin water users, including vineyard operations, in the future sustainable management of groundwater resources to prevent chronic lowering of groundwater levels, reduction of groundwater storage, degraded water quality, land subsidence, and surface water depletions throughout the Groundwater Basin, which include
areas inside and outside of the City. Furthermore, the City has concluded that sufficient steps have been/are being taken to ensure a sufficient groundwater supply for existing and future residents through estimated water budget to ensure the future sustainable yield for the Paso Robles Groundwater Basin.

The 2015 UWMP integrates regional planning efforts as appropriate. The City, in preparing the 2015 UWMP, has an active role in regional groundwater basin monitoring, management, and planning in cooperation with San Luis Obispo County and other basin stakeholders.

The potential for the project to result in an impact associated with lack of available water supplies is discussed in Impact WS-1. Based on the analysis conducted in the WSA, the Draft EIR finds that the proposed Specific Plan at full buildout would result in a net increase in water use by 216 AFY (refer to Table IV.K-4, City of Paso Robles Single and Multiple Year Supply and Demand Projections). The potential commercial and non-residential uses (a net increase of 25 AFY) were not accounted for in the UWMP however, additional supply is also identified in the project cumulative impact discussion of the DEIR (page IV.K-12) the City has an additional 35 AFY of supply available from its water supply portfolio of Lake Nacimiento water, groundwater from the Paso Robles Groundwater Basin and water from the Salinas River. As discussed in Impact WS-1 and the WSA for the project, the water supply needed to serve the project’s residential potable water demand and a portion of its non-residential demand is included in the 2015 UWMP supply and demand projections.

Regarding the use of recycled water the Specific Plan area would connect to the City’s planned recycled water distribution system at the northwestern boundary of the Beechwood property within Airport Road. Recycled water would be used to irrigate the community parks, neighborhood open space, water quality basins, and the vineyards.

As a result, the Draft EIR concludes the City has sufficient water supply available to serve the Specific Plan area from existing entitlements and resources.
Master Response 2 – Transportation/Traffic

Multiple commenters expressed concerns regarding potential traffic and congestion impacts on local intersections, roadways, and freeway facilities. While commenters expressed concern regarding existing traffic and congestion issues in the City, the Draft EIR analysis and this response are limited only evaluating any potential new or exacerbated traffic impacts that could result from the proposed project. Generally, commenters voiced concern that new vehicle trips associated with the development of the Specific Plan area would worsen traffic conditions in the City. A number of comments addressed specific traffic impacts at the following roadways and associated facilities, and at certain freeway facilities:

- Charolais Road
- South River Road
- Meadowlark Road
- U.S. 101
- Creston Road
- Niblick Road

The project’s potential transportation impacts are discussed in Section IV.G, Transportation/Traffic. The analysis in this section is based on the Transportation Impact Analysis (TIA) prepared by Central Coast Transportation Consulting (CCTC) in May 2019, which follows the Draft EIR in Appendix G. The TIA evaluated the impacts of the project on 25 intersections, 12 roadway segments, and 21 freeway facilities under existing plus project conditions, near term plus project conditions, and cumulative plus project conditions. The study area facilities evaluated in the TIA were selected in consultation with City, County, and Caltrans staff. Tables IV.G-1 through IV.G-5 identify the transportation facilities evaluated in the TIA and Draft EIR and show the existing level of service at each evaluated intersection, roadway segment, and freeway segment.

As discussed in Impact TR-2 through Impact T-25, and Section IC.G-6, Cumulative Impacts, all project area intersections, roadway segments, and freeway facilities would operate at pre-project levels under existing + project, near term + project, and cumulative+ project conditions with the incorporation of mitigation measures, with the exception of the following facilities:

- **Intersections (refer to Impact TR-2, TR-8, TR-16):** State Route 46 East/Union Road, State Route 46 East/Airport Road, and State Route 46 East/Golden Hill Road.
- **Intersection Queues (refer to Impact TR-6, TR-13, TR-21):** 1st Street-Niblick Road/Spring Street and Niblick Road/South River Road.
- **Roadway Segments (refer to Impact TR-14, TR-24):** Niblick Road (east of Spring Street) and Creston Road (east of Ferro Lane)
The project would result in significant and unavoidable impacts at the above-mentioned transportation facilities. Level of Service impacts to the State Route 46 East/Union Road and State Route 46 East/Airport Road intersections would occur at the project-level, while impacts to and State Route 46 East/Golden Hill Road would occur under cumulative conditions. State Route 46 East/Union Road operates with unacceptable queues currently, without the addition of project-level traffic.

Queuing impacts to the 1st Street-Niblick Road/Spring Street and Niblick Road/South River Road intersections would occur at the project-level and under cumulative conditions. Operates with unacceptable queues currently, without the addition of project-level traffic.

Capacity impacts to the Niblick Road (east of Spring Street) roadway segment would occur both at the project level and under cumulative conditions, while impacts to the Creston Road (east of Ferro Lane) roadway segment would only occur under cumulative conditions.

Impacts to the U.S. 101 northbound (SR 46 West On Ramp), U.S. 101 northbound (SR 46 West Off Ramp), U.S. 101 northbound (North of SR 46 West), U.S. 101 northbound (Spring Street Off Ramp), U.S. 101 southbound (Spring Street On Ramp), U.S. 101 southbound (North of SR 46 West), U.S. 101 southbound (SR 46 West Off Ramp), and U.S. 101 southbound (SR 46 West On Ramp) freeway facilities would occur at the project level and under cumulative conditions. Several of these facilities operate at unacceptable levels of service currently, without the addition of project-level traffic. Although widening the mainline to a six-lane facility between Spring Street and Main Street would improve operations to LOS C or better for most segments, widening is difficult and is not included in the US 101 Transportation Concept Report or Regional Transportation Plan for this segment.

Potential mitigation to address project-level and cumulative impacts at freeway segments and intersections with State facilities would require Caltrans coordination and approval, which results in uncertainty regarding timing and implementation, making mitigation potentially infeasible. Under cumulative conditions, it is assumed that planned improvements to the State Route 46 East/Union Road and State Route 46 East/Airport Road intersections would be completed.

At 1st Street-Niblick Road/Spring Street and Niblick Road/South River Road, the project would result in project/cumulative-level impacts but feasible mitigation would not return queues to pre-project levels. The Niblick Corridor Study, currently being completed by the City, identifies infrastructural constraints, including the lack of availability of right-of-way width to accommodate additional lanes on the Niblick Road bridge and right-of-way constraints at Niblick Road/South River Road. Because of the lack of available right-of-way for additional lanes and left turn pockets, mitigation that could reduce capacity impacts is considered infeasible due to financial and logistical reasons. A wider intersection is not desirable for pedestrians. No feasible mitigation has been identified that would reduce the capacity impacts on the segment of Niblick Road east of Spring Street. Widening the bridge to a six-lane arterial would result in a capacity utilization below 70%, which would reduce vehicle delays, but would also support higher vehicle speeds and would conflict with the City’s multimodal goals and desire to maintain its small-town character. No feasible mitigation has been identified that would reduce the capacity impacts on the segment of Creston Road east of Ferro Lane. The projected capacity utilization of 92% on Creston Road does not justify widening. In 2018, the City Council approved a preferred alternative
for the Creston Road Corridor between South River Road and Niblick Road. The preferred alternative includes a three-lane cross section with two travel lanes and center turn lane from South River Road to Rolling Hills Road where the road transitions to a five-lane cross section with four travel lanes and a center turn lane. Also included are Class II bike lanes throughout the corridor and intersection enhancements.

Pursuant to the requirements of Section 15091 of the State CEQA Guidelines, for each significant and unavoidable impact of the project, City decision makers will be required to adopt written findings asserting that specific economic legal, social, technological, or other considerations render infeasible the mitigation measures or project alternatives identified in the Final EIR. Pursuant to the requirements of Section 15093 of the State CEQA Guidelines, City decision makers will be required to adopt a Statement of Overriding Considerations that describes the specific economic, social, technological, or other considerations that outweigh the significant and unavoidable transportation impacts from the project.

Additional specific transportation-related concerns raised by commenters included the following topics:

- Vehicle traffic adjacent to Virginia Peterson Elementary School along Meadowlark Road and Beechwood Drive;
- Congestion impacts at the three Salinas River bridge crossings used by motorists to connect between west and east Paso Robles;
- Concerns regarding traffic impacts to northbound U.S. 101 and Niblick Road between Spring Street and South River Road;
- Congestion impacts at Charolais Road and River Road;

Each of these environmental topics is addressed in the Draft EIR, as summarized in the following paragraphs.

**Virginia Peterson Elementary School**

Potential traffic impacts near Virginia Peterson Elementary School were analyzed at the intersection at Creston Road/Meadowlark Road and at Oriole Way/Meadowlark Road. In addition, circulation issues related to the School were evaluated in detail in the Site Access and On-Site Circulation section of the TIA, with recommendations summarized in Table 17 of the TIA. The TIA concluded that the addition of project trips would result in unacceptable intersection operations at Creston Road/Meadowlark Road under existing plus project, near term plus project, and cumulative plus project conditions. However, implementation of Mitigation Measure TR-3(b), which requires the installation of a traffic signal and restriping, would return the intersection operation to pre-project levels. Additionally, Mitigation Measure TR-23 would require the Applicant to update existing speed limit and crossing signage near the school, install a flashing yellow beacon, install ladder crosswalk striping at uncontrolled crossings, and make the stop-controlled crossing consistent. Beechwood Drive and the intersection at Beechwood Drive/Meadowlark Road was evaluated as a part of the Site Access and On-Site Circulation section of the TIA, which concludes that all project access points and the Meadowlark Road/Beechwood Drive intersections are forecast to operate acceptably under all scenarios. Therefore, with implementation of mitigation, the project would not result in a significant traffic impact adjacent to Virginia Peterson Elementary School.

**Salinas River Bridge Crossings**
Potential impacts of the project to congestion at the bridge crossings of the Salinas River were analyzed along applicable segments of Creston Road and Niblick Road and at the following intersections near the bridge crossings: 13th Street/Riverside Avenue, 13th Street/Paso Robles Street, North River Road/Creston Road, 1st Street-Niblick Road/Spring Street, and Niblick Road/South River Road. The TIA concluded the project would not cause LOS impacts at intersections near the three Salinas River crossings. However, the TIA and Draft EIR concluded that the project would result in queue impacts at the 13th Street/Riverside Avenue, 13th Street/Paso Robles Street, and Niblick Road/South River Road intersections under existing, near term, and cumulative conditions. In addition, the project would impact queues at 1st Street-Niblick Road/Spring Street under near term and cumulative conditions, and at North River Road/Creston Road under cumulative conditions.

Implementation of Mitigation Measures TR-4(a), TR-4(b), and TR-20 would reduce project impacts to queue lengths to pre-project conditions at 13th Street/Riverside Avenue, 13th Street/Paso Robles Street, and North River Road/Creston Road. Implementation of Mitigation Measure TR-6 and TR-13 would improve traffic conditions at 1st Street-Niblick Road/Spring Street and Niblick Road/South River Road, but would not return queues at these facilities to pre-project levels. Mitigation is not feasible because there is insufficient right-of-way to extend the left turn pockets. As a result, queuing impacts at 1st Street-Niblick Road/Spring Street and Niblick Road/South River Road would be significant and unavoidable. In addition, as discussed under Impact TR-14, TR-24 and in Section IV.G-6, Cumulative Impacts, no mitigation has been identified to reduce the capacity utilization on the Niblick Road roadway segment east of the bridge due to infrastructural constraints, including the lack of availability of width to accommodate additional lanes on the Niblick Road bridge and right-of-way constraints at Niblick Road/South River Road.

Northbound U.S. 101 and Niblick Road between Spring Street and South River Road

LOS at U.S. 101 northbound between Spring Street and SR 46 East does not exceed LOS C under existing conditions, as shown in Table IV.G-5. The U.S. 101 Spring Street off ramp operates at LOS D under existing conditions during the PM peak hour. Niblick Road between Spring Street and South River Road operates at a capacity utilization of 79 percent (equivalent to LOS D) under existing conditions, as shown in Table IV.G-3. Queue lengths at the Niblick Road/South River Road intersection exceed capacity in the northbound lane, southbound lane, and westbound lane under existing conditions during AM and PM peak hour, as shown in Table IV.G-2. As shown in Figures IV.G-3 through IV.G-5 in the Draft EIR and in Figure 6b in the TIA, fewer than 300 trips are estimated to be added to the Niblick Road bridge during the PM peak hour under existing and near term plus project conditions. With the implementation of the project, the Draft EIR concluded that the project would result in significant and unavoidable LOS impacts to the U.S. 101 northbound Spring Street off ramp and the Niblick Road segment between Spring Street and South River Road, and to queue lengths at the 1st Street-Niblick Road/Spring Street and Niblick Road/South River Road intersections. Impacts at the Spring Street off ramp were identified as significant and unavoidable due to the need for Caltrans coordination and approval, which results in uncertainty about the timing and implementation of mitigation. The Niblick Road Corridor Study, currently being completed by the City, identifies infrastructural constraints, including the lack of availability of width to accommodate additional lanes on the Niblick Road bridge and right-of-way constraints at Niblick Road/South River Road. Corridor improvements would not improve roadway capacity or queue length at 1st Street-Niblick Road/Spring Street and Niblick Road/South River Road to pre-project levels. Therefore, these impacts were identified as significant and unavoidable.
Charolais Road between Creston Road and South River Road

The Charolais Road roadway segment east of South River Road was is an arterial road that currently operates with LOS C and 36% capacity utilization. The South River Road/Charolais Road intersection currently operates at a Level of Service C during the AM and PM peak hours, which is considered acceptable. As discussed in Section IV.G-5, the vehicle trip distribution identifies the origins and destinations of new trips in the study area. Map IV.G-2 shows the roadway trip assignments.

The TIA and Draft EIR (Impact TR-3) identify that the addition of project traffic would worsen the Level of Service to F during the AM and PM peak hours, which is below the City’s Level of Service D threshold. Mitigation Measure TR-3(b) would require the applicant to construct a single-lane roundabout at the South River Road/Charolais Road intersection. A roundabout is consistent with the City’s Circulation Element and would increase the Level of Service to A during the AM and PM peak hours under cumulative plus project conditions.

The Creston Road/Charolais Road intersection was analyzed under Impact TR-8 and Section IV.G-6, Cumulative Impacts. Under near term and cumulative conditions, the project would cause this intersection to operate at an unacceptable level. Implementation of Mitigation Measure TR-8 would require the installation of an all-way stop and would reduce near term and cumulative impacts to pre-project conditions at the Creston Road/Charolais Road intersection.
I would like to express my concern about this large project. If you try to get to the freeway from this proposed project area now around 8 am, the back up at the stop sign at Charolais and River Road is deep as the city does not have enough bridges between east and west Paso. Any additional traffic will cripple the ability of those of us in the east to get to restaurants and shops in the west. Many of us moved here to get away from the long waits experienced at red lights in Los Angeles and other metro areas. We love what we have and hope you will consider leaving this beautiful area “population density” low.

Thank you for your consideration
Lynn Crawford
805 712-9389

Sent from my iPhone
Letter 1

**COMMENTER:** Lynn Crawford  
**DATE:** March 13, 2020  

The commenter expresses concern about traffic. Specifically, the commenter states that there is a queue at the Charolais Road and River Road intersection stop when travelling westbound in the morning. The commenter states that additional traffic will inhibit the ability of residents on the east side of the city from reaching destinations in the west side of the city.

The transportation impacts of the project, including impacts to the South River Road/Charolais Road intersection, are discussed in Master Response 2.

The commenter’s preference for low population density does not relate to environmental issues of the project but will be forwarded to City decision-makers for review and consideration.

No revisions to the EIR are warranted.
Letter 2

City of Paso Robles  
Community Development Department  

Beechwood Specific Plan

2020 DEIR Public Comment  
Received as email

From: David Atchison <sportspam@comcast.net>
Sent: Saturday, March 14, 2020 12:45 PM
To: Planning
Cc: Laura Atchison
Subject: Beechwood Specific Plan Concerns

Since we live in very close proximity to the proposed Beechwood development we have a number of serious environmental concerns. These are listed below.

Valley Fever: This is a major concern. The soil in the area has been undisturbed for many years and upsetting the soil with major excavation will stir up a great deal of dust. We feel that there is a large likelihood that the type of fungus spores that cause valley fever exist in this soil. With the anticipated week after week, month after month and even year after year excavation, this will release an incredible amount of dust to be spread around the community with the afternoon winds. This puts our whole community in Southeast Paso at risk for the disease. So they will no doubt say they will keep it watered down to reduce dust but we are not convinced they will do so on a consistent basis as we have observed with other construction projects in the area.

Water drainage: With the completion of streets and storm drains, where will all this water go? The creek that runs through our property flows at capacity in its current state from existing storm drains in surrounding neighborhoods. We hope that any drainage from the Beechwood Development will be re-directed somewhere else, otherwise we could be at flood risk. What's the plan here?

Water availability: The City states that we have plenty of water for full build-out to a 44K population. The question is; what if we experience another multi year drought as is common in California, especially in this area? Will a 4-5 year drought use up the reserves?

Traffic: With the combination of Olsen Chandler and Beechwood Developments, the traffic will be very congested at peak hours. With the addition of approximately 15,000 more people what will downtown look like in the evenings not to mention grocery stores on the weekends?

These are concerns shared by many of our neighbors. Thank you for your consideration in these matters and we hope that the Environmental Impact Report is taking a serious look at these.

Thank you,

David and Laura Atchison
2318 Ashwood Place
The commenter states a variety of concerns regarding valley fever, water drainage, water availability and traffic congestion.

The project’s potential to expose receptors to Coccidioides fungus, which can cause Valley Fever, is evaluated in Section IV.I, Air Quality and Greenhouse Gas Emissions. The project is required to implement Mitigation Measure AQ-2(g) Fugitive Dust Control Measures in addition to the Visible Emissions Monitoring MM AQ-2(a)(g) as part of the Construction Area Management Plan. Watering down areas of disturbance and utilizing dust suppressant during dry windy conditions would reduce construction-related air quality impacts and thus reduce potential exposure risk to the Coccidiodes fungus. Implementation of the dust suppression and Construction Area Management Plan would address the concerns of Valley Fever.

Section IV. K, Water Supply and Wastewater Capacity, evaluates the potential increase flows to the city sewer collection infrastructure. The City’s 2006 Sewer Collection System Master Plan analyzed the potential increased flows from all City new development and expansion areas on the east side of the City (City of Paso Robles 2006). In late 2018 the City commenced an update of this Plan. In the interim, the Project applicant has worked with the City to determine the infrastructure needed off-site to accommodate the Project’s wastewater flows using updated forecasts. Offsite improvements include adequate sizing of pump stations and replacing the sewer main along Beechwood Drive. With these adequately sized pipelines, no significant impacts to wastewater collection capacity will occur. This impact would be less than significant without the need for mitigation.

The commenter is concerned about where drainage and storm water will be routed. The project is required to comply with State and City Stormwater Requirements. This includes compliance with State Post Construction Stormwater Requirements Resolution R3-2013-0032, which addresses water quantity and quality. The project is required to design the subdivision to comply with Tiers 1 through IV of the State Order. In addition, the project is required to detain stormwater to match predevelopment discharges to Comply with the City’s Standard Details and Specification. Ultimately, stormwater will be treated and discharged in the same location and manner as occurs prior to development. Compliance with these requirements will mitigate any stormwater impacts to an insignificant level. The availability of water supply to serve the project is discussed in Topical Response 1.

The commenter states that they are concerned about traffic resulting from the project. Specifically, the commenter states that in combination with the Olsen-South Chandler Ranch development, traffic will be congested during the peak hours. The commenter questions what impact the additional population and traffic will have on the downtown and grocery stores.

The transportation impacts of the project, including cumulative impacts resulting from this project in conjunction with other planned projects, are discussed in Master Response 2.

The commenter’s concerns regarding occupancy levels of grocery stores and downtown do not relate to environmental issues of the project and are beyond the scope of this EIR but will be forwarded to City decision-makers for review and consideration.

No revisions to the EIR are warranted.
City of El Paso de Robles
Community Development Department

Beechwood Specific Plan
Project Comment

Date: 3/25/2020

Mailing Address: 1005 Little Quail Place

Email Address: mcreasland229@gmail.com

Please complete the contact information if you want to be notified of future meetings

Project Comments:

Please provide further information regarding the source of water currently available and able to support 911 residential units including 150 multi-family residential units. Over the last two years, our residential home owners have received multiple notices from the city water department threatening actions for failure to comply with water conservation measures. If the current water infrastructure has been unable to support our current housing foundation, how will the addition of 911 residential units have enough adequate water supply. The draft EIR does not fully explain annual water demands placed upon both surface and ground water resources in our area when coupled with NOAA climate change hydrology studies forecast in the coming decade.
The commenter states that they are concerned about availability of water supply to serve the project.

The availability of water supply to serve the project is discussed in Master Response 1. Potential effects of Climate Change and hydrology and sea level rise is discussed in the Environmental Setting section of the Air Quality and Greenhouse Gas section of the EIR, refer to page IV. I-7 and IV.I-8

Regarding the amount of residential units as part of the project Section V-1, Alternatives, evaluates the potential environmental effects of alternatives to the project, including two alternatives that include fewer residential units.
To: City of Paso Robles Planning

April 6, 2020

This letter is in regards to the Beechwood Specific Plan. We live on Falcon Drive close to Meadowlark Road. The large number of proposed housing and commercial development is of concern. At present time the traffic on Meadowlark is pretty heavy at times, noisy, and many people do not drive safely. They drive through the stop streets without looking and stopping. There are those who drive through at high speeds, disregarding the school children and the school area.

Creston Road is very dangerous at times. The same situations occur along that area of the proposed locality. For those of us who bike ride in the Creston Road area we often encounter cars, trucks, and motorcyclists driving in part on the bike lane at high speeds.

When the developments on Beechwood and Meadowlark were built, the contractor did very little to eliminate the dust in the area. Meanwhile we had to often times do what we could to deal with extreme dust in the construction phase.

I personally think as others I've spoken with agree, that this is an over development for the area.

Respectfully Submitted

[Signature]
The commenter states that they are concerned about the increased traffic and dust during construction.

The commenter states that the existing traffic on Meadowlark is heavy at times, is noisy, and that many people do not drive safe. The commenter states that many people drive through the stop signs. The commenter states that many people drive through the school area at high speeds. The commenter states that vehicles and motorcyclists drive at high speeds in the bike lane on Creston Road.

Section IV.H, *Noise*, discusses the impacts of the project on the noise levels in the area, including noise from additional traffic. Impact N-1 identifies that long-term traffic generated by the project would increase local traffic noise levels, but that the increase would be less than 3 dBA, which is the threshold for a significant increase. Therefore, noise from additional traffic would not be significant. No mitigation measures are necessary.

The Specific Plan area would be served by the City of Paso Robles Police Department as discussed in Section IV.M, *Public Services*, which would monitor for traffic violations including speeding, lane violations, and running through stops. However, the commenter’s concerns regarding speeding, lane violations, and vehicles running stop signs do not relate to environmental issues of the project and are beyond the scope of this EIR but will be forwarded to City decision-makers for review and consideration.

As described in Section IV.I, *Air Quality and Greenhouse Gas Emissions*, the project’s long-term operational and cumulative air quality impacts would be significant and unavoidable, even with implementation of required mitigation, including Mitigation Measure AQ-3, which requires land use emission reduction measures. The project’s potential construction air quality impacts and consistency with the San Luis Obispo Air Pollution Control Agency’s (SLOAPCD’s) 2001 Clean Air Plan would be reduced to a less than significant level with required mitigation. Mitigation for air quality impacts includes Mitigation Measure AQ-1, which requires alternative transportation and transportation demand management measures; Mitigation Measures AQ-2(a) through AQ-2(g), which require construction activity BMPs, and dust control measures; Mitigation Measure AQ-3, which requires land use emission reduction measures; Mitigation Measure AQ-4, which requires demolition emission control measures; and Mitigation Measure AQ-5, which requires Valley Fever suppression measures.

The commenter’s opposition to the project will be forwarded to City decision-makers for review and consideration.

No revisions to the EIR are warranted.
Good Afternoon. I live on Barley Grain Road, which connects Creston to So. River Road, via Spanish Camp. It is a county road, not within the city limits. My comment re the EIR for Beechwood is as follows: I would urge not allowing the development to exceed the original approx. 650 units the Annexation authorized. The EIR makes several assumptions/conclusions that are without factual basis, and clearly defy logic. It cites the main water source as Lake Nacimiento. What happens if it goes dry, as it almost did recently, and is subject to Monterrey Co. priority usage, since they own it.? How can the City of Paso Robles afford, in their current budget status, to pay for the necessary services needed for the increased population of this project, as well as others, (Olsen, River Oaks by the golf course)? It should be noted that in 2018, the City asked the voters to approve a sales tax increase, arguing that the city then needed more revenue to pay for the services for the population level at that time. How can the city now afford to pay for added populations, especially in light of our current "recession" economy situation? The police chief, Ty Lewis states publicly that he needs approx 24 new, additional officers to adequately make Paso safe, without new housing units. Will the city soon try again to get a tax increase. Taxes and fees in Paso Robles are already near the highest in the County, not including extremely high cost of living in the County. (highest gasoline costs in the US!!) The subject of traffic impact on roads near Beechwood would clearly be impacted more that what is reflected in the report. Charolais is already a bottleneck during rush hours. Our neighborhood is greatly concerned that Barley Grain, a residential, narrow road, will be also greatly impacted. I urge the Planning Dept of the City to take a reasoned, conservative evaluation of this project and adhere to the original intent regarding its size. That the City years ago set a goal of 44,000 population level, (an increase of 25%) does not mean the City at this time, under current drought/climate and economic conditions, has to allow it. Thank you for considering my remarks. John Fisher
The commenter states that they oppose the project. They are concerned about water availability, development fees, police services, tax increase and increased traffic.

The transportation impacts of the project, including significant and unavoidable impacts, are discussed in Master Response 2. The availability of water supply to serve the project is discussed in Master Response 1. Section V-1, Alternatives, evaluates the potential environmental effects of alternatives to the project, including two alternatives that include fewer residential units.

As described in Section IV.M, Public Services, the project would not trigger the need for the construction of new or updated public service facilities. Through formation of a Community Facilities District a CFD “Special Tax” would be collected. The CFD finances fire protection services, police protection services, and library services (Resolution 05-063). The City of Paso Robles has adopted the “Special Tax” to finance public services for new development within the CFD. The payment of the special tax is not necessary to reduce impacts to less than significant.

Regarding the commenter’s statements relating to the availability of housing for law enforcement officers, Section 15131 of the State CEQA Guidelines states “economic or social effects of a project shall not be treated as significant effects on the environment.” Comments that pertain to the potential financial or economic impacts of the project and do not reflect on the adequacy or content of the Draft EIR will be forwarded to City decision-makers for review and consideration. Furthermore, the city provision of special tax that will be applied to this project would contribute to facilities to house law enforcement.

Comments that pertain to the potential financial or economic impacts of the project, which do not relate to environmental issues of the project and do not reflect on the adequacy or content of the Draft EIR, will be forwarded to City decision-makers for review and consideration.

The commenter’s opposition to the project will be forwarded to City decision-makers for review and consideration.
City of Paso Robles,

I remain concerned about increased traffic, noise, air pollution, emergency services, the attractive nuisance of a park across the street from my neighborhood.

Without another access to highway 101, we are in a dangerous spot for an evacuation.

Please consider your existing citizens' daily life, safety.

Christa Beard

RECEIVED
APR 10 2020
BUILDING DIVISION
From: Christa Beard themrscbeard@gmail.com
Subject: housing developments S-E Paso Robles
Date: Feb 20, 2020 at 9:56:45 AM
To: council@prcity.com, planning@prcity.com

Hello city planners,

I'm a neighbor on Silver Oak Drive, very near three planned developments. Our family chose this neighborhood when we needed a larger house to accommodate our growing family for many reasons.

The most important reason was very limited traffic, a safety reason. We had four kids running around the neighborhood, riding bikes, drawing with sidewalk chalk, and we didn't want anyone hit by a car. Our three kids still at home are out every weekend, and they deserve a safe neighborhood in which to play.

We also enjoy the natural beauty of fields and oaks several times a day and on occasional nights. During the day, we watch the fields for livestock and wild animals, look for changes with weather and season. At night, we enjoy the stars, moon, planets and have watched many special celestial events because the night sky is so visible over the open space.

Clean air is also important to us and our growing children. When I'm out walking or running, I travel on Beechwood, Meadowlark, Airport, Scott, Creston, and the exhaust on Creston is noticeable and worse during harvest season when there are so many trucks running day and night.

The proposed housing and commercial development will impact our daily lives. The light pollution will stop us from seeing meteor showers, planets and objects in orbit from the end of our street.
Traffic from construction vehicles makes our streets dangerous for my kids while they are out playing. Exhaust from those trucks also creates a problem with air pollution. When the thousands of cars from new residents are on the road, those problems continue. There is a section of Creston that is south of the section to be updated and widened without a bike lane. We ride bikes to school when we can, and I'd like a bike lane before traffic increases.

Currently, traffic in our area can be heavy. Creston has only one lane in each direction, speeding and aggressive driving are an existing issue, and slow trucks and increased cars on the small road will only increase problems with risky driving. Charolais to River Road to Niblick and Creston to Golden Hills Road (through the 4-way stop at Union) are the only routes I imagine for this construction and new resident traffic, and these routes have problems with congestion, speed, aggressive driving, illegal passing, crashes into poles and walls. Increasing traffic without enforcement of speed and other laws, is irresponsible. Just this morning, a car speeding down Beechwood to Creston turned onto Creston, turned on Barley Grain, and this is a typical route for folks trying to get to 101 without dealing with all the traffic and waiting to get to the Niblick bridge and onramp there. That makes it clear we need an onramp for residents at the south end of town.

California has lost entire towns to wildfire and hundreds of homes in dense neighborhoods in cities to urban firestorms. Adding these homes increases the risk my family faces from fire. With this real and increased risk of fire, there is no evacuation plan I can see from the city. If everyone had to get out to escape a fast moving fire, Our family
and pets would likely burn to death in our minivan. Without another way to access 101, this development puts my family in danger if there was a need to evacuate. The current population trying to flee a fire would be problematic, but adding thousands more cars trying to get to 101 in an evacuation is impossible.

A sports park is proposed across the street from my neighborhood. If it acts like Sherwood soccer fields or Barney Schwartz, it will be a nuisance when it is in use for sports, and when it is not. During sports, lights, noise, traffic, parking, litter, will be problems. When it is a dark and vacant place, it will attract people that want to hide, homeless, drug users, mischief makers, and that trash is a dangerous, likely biohazard, problem. I do not want to attract criminals to my neighborhood.

Maintenance of any park, sports or playground, is a concern. We have seen how Larry Moore Park was neglected by the people put in charge of it. I am of course glad the city took over to make it useable and safe, but the current proposal sounds like Larry Moore part 2. The price of maintenance must be addressed before a park is built. Sherwood Park was lovely for a couple months then whet downhill fast, and the excuse provided from the city to me was that they had money to built it but not to maintain it.

Our current police force is not adequate to patrol school zones, as evidenced by flashers targeting kids walking to and from school, kids being hit while walking or biking to and from school. I've emailed the police about problems in the school zones I pass through taking kids to and from school, and they emailed the the same excuse about not
enough personal to patrol. I've required assistance with domestic abuse, and there were times that help never came. We cannot add thousands to our population without addressing the needs that currently exist.

Fire, ambulance and other disaster response also needs to be considered. There are new venues in some far out places catering to wine tourists and more seem to be popping up all the time. If there is an emergency, can we manage thousands more residents, all the hundreds of guests at music or wedding events safely? There simply has to be enough equipment and staff to respond to a mass shooting at a concert and manage typical city calls.

The schools closest to our neighborhood, that I see at different points during the day, seem to be past capacity. During drop off and pick up times, the traffic is heavy and dangerous for drivers and pedestrians. Other times during the school day, parking lots are full, streets are full, bike lanes have been turned into parking lanes because there are so many cars. I don't see how the current elementary, middle, high schools can manage even more students.

Virginia Peterson Elementary School is right on the corner where one development is proposed. Meadowlark is residential and a 25mph street; Beechwood is the same, even if there isn't a sign. The construction traffic has to take one of these roads to get to the development site. The pollution right across the street from where kids are playing at recess is a huge concern. Air pollution kills people; children are especially vulnerable, and there is a school for special needs kids on Beechwood. All those vehicles will also be disturbing
dirt, acres of dirt, and valley fever becomes a concern. It is in our county, cases are on the rise, and this project puts my kids, kids at that school and families in neighboring homes at risk. I need to know if the city or the developer is paying those doctor and hospital bills.

I question the need for these homes when there are so many existing homes on the market for months at a time. But, if they are built, I expect them to have rooftop solar systems to offset the increase electricity usage while we lose a power plant. I expect them to have greywater systems to water any landscaping. I expect the developer to pay for the roads damaged by their heavy construction vehicles.

Thank you for your time,

--
Christa Beard

wife to Chris, mom to Calliope, Cooper, Clio, Claire
Letter 6

COMMENTER: Christa Beard

DATE: April 10, 2020

The commenter states that they are concerned about the increased traffic noise, air pollution, light pollution, emergency services, wild fires and aesthetics.

The commenter states that they are concerned about increased traffic. Specifically, the commenter states that without another route to access Highway 101, evacuation would be difficult/dangerous. The commenter expresses concerns that traffic from construction would make the street dangerous for kids to play. The commenter states Creston Road currently experiences excessive speeds and aggressive driving and that project traffic will exacerbate the issue. The commenter states Charolais to River Road and Niblick and Creston to Golden Hills Road will be used for the project and that these routes currently experience issues with speeding, aggressive driving, illegal vehicle maneuvers, and accidents. The commenter states that enforcement of traffic laws is needed. The commenter states a preference for a Highway 101 on-ramp at the south end of the City. The commenter states that traffic is heavy during school pick-up and drop-off times. The commenter states a preference for the developer to rectify any damage to City streets due to construction vehicles.

The applicant states a preference for a bike lane on Creston Road south of the section to be widened.

The transportation impacts of the project, including Salinas River bridge crossings to access Highway 101 and impacts to Virginia Peterson Elementary School, are discussed in Master Response 2.

The Specific Plan area would be served by the City of Paso Robles Police Department as discussed in Section IV.M, Public Services, which would monitor for traffic violations including speeding, aggressive driving, and illegal vehicle maneuvers. However, the commenter’s concerns regarding existing speeding, aggressive driving, and illegal vehicle maneuvers do not relate to environmental issues of the project and are beyond the scope of this EIR but will be forwarded to City decision-makers for review and consideration.

The fees required for the project under the City’s TIF program include the costs anticipated to improve roadways to meet the expected traffic demand created by the project. The City will monitor construction activities and will require the project to repair any project related road damage, which is a standard encroachment permit requirement. In addition, the City’s Public Works Department includes a Street Maintenance Division, which is responsible for maintaining roads within the City limits. The City’s Capital Improvement Plan identifies necessary improvement projects for long-term road maintenance. Short-term road repairs occur, as needed, through public service requests. The commenter’s concerns regarding existing levels of road maintenance do not relate to environmental issues of the project and are beyond the scope of this EIR but will be forwarded to City staff for review and consideration.

BEECHWOOD SPECIFIC PLAN FINAL EIR
As described in Section IV.I, *Air Quality and Greenhouse Gas Emissions*, the project’s long-term operational and cumulative air quality impacts would be significant and unavoidable, even with implementation of required mitigation, including Mitigation Measure AQ-3, which requires land use emission reduction measures. The project’s potential construction air quality impacts and consistency with the San Luis Obispo Air Pollution Control Agency’s (SLOAPCD’s) 2001 Clean Air Plan would be reduced to a less than significant level with required mitigation. Mitigation for air quality impacts includes Mitigation Measure AQ-1, which requires alternative transportation and transportation demand management measures; Mitigation Measures AQ-2(a) through AQ-2(g), which require construction activity BMPs, and dust control measures; Mitigation Measure AQ-3, which requires land use emission reduction measures; Mitigation Measure AQ-4, which requires demolition emission control measures; and Mitigation Measure AQ-5, which requires Valley Fever suppression measures to reduce this potential impact to a less than significant level.

The project’s impacts to visual character are evaluated in Section IV.F, *Aesthetics*. Urban development of the Specific Plan area is anticipated in the Paso Robles General Plan, and the project is consistent with the long-term buildout vision in the General Plan. The density of new development proposed in the Specific Plan area would be comparable to existing development west and south of the Specific Plan area. The project’s potential impacts to visual resources, including light and glare, would be less than significant with required mitigation, which includes preparation of a Master Landscape Plan for the Specific Plan area that identifies landscape buffers between residential and non-residential development and open space areas/parks, plantings that screen outdoor parking areas and residential and non-residential structures, and shielded lighting (Mitigation Measure AES-2).

As described in Section IV.M, *Public Services*, the project would not trigger the need for the construction of new or updated public service facilities. Through formation of a Community Facilities District a CFD Special Tax would be collected. The CFD finances fire protection services, police protection services, and library services (Resolution 05-063). The City of Paso Robles has adopted the “Special Tax” to finance public services for new development within the CFD. The payment of the special tax is not necessary to reduce impacts to less than significant.

Section V, *Alternatives*, evaluates the potential environmental effects of alternatives to the project, including a reduced density alternative that would result in reduced air quality and greenhouse gas emissions impacts in comparison to the proposed project. The commenter’s statement that the scale of the project is too large does not relate to environmental issues of the project and is beyond the scope of this EIR but will be forwarded to City decision-makers for review and consideration.

No revisions to the EIR are warranted.
Letter 7

City of Paso Robles
Community Development Department

Beechwood Specific Plan

From: Casey Biggs <caseypbiggs@gmail.com>
Sent: Tuesday, April 21, 2020 8:41 AM
To: Planning
Subject: Beechwood EIR response

April 21, 2020

Re. Beechwood Specific Plan EIR:

While understanding the need for more housing we, as a community need to responsibly consider how to move forward.

After viewing the EIR Document it is painfully apparent that the project should be at a minimum reduced to half its intended size.

The numbers of Class 1 impacts alone are enough to red flag the project. The number of Class 2 impacts should raise the red flag even higher.

Over 900 hundred new dwellings will result in 2000 new vehicles which alone will impact the area in a dangerous way.

The report itself states that no mitigation has been identified to deal with a number of these problems. (Class 1)

Access of emergency vehicles (Class 1)

Long-term operational air pollutant emissions. (Class 1)

The Environmental Impact problems are too numerous to mention.

I strongly oppose the project as presented.

Respectfully,

Casey Biggs

1981 Barley Grain Road
The commenter states that they oppose the project. They are concerned about increased traffic, air pollution emissions, the number of Class 1 environmental impacts, access of emergency vehicles and desires lower density housing.

The transportation impacts of the project, including Class 1 immitigable impacts, are discussed in Master Response 2. A Class I impact is a significant and unavoidable impact that will have an adverse effect on the physical environment that cannot be avoided or reduced to a less than significant level even if reasonable mitigation measures are incorporated. In order for the City to approve the project, a Statement of Overriding Considerations will need to be adopted that identifies specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of the project that outweigh the unavoidable adverse environmental effect.

As described in Section IV.I, Air Quality and Greenhouse Gas Emissions, the project’s long-term operational and cumulative air quality impacts would be significant and unavoidable, even with implementation of required mitigation, including Mitigation Measure AQ-3, which requires land use emission reduction measures. The project’s potential construction air quality impacts and consistency with the San Luis Obispo Air Pollution Control Agency’s (SLOAPCD’s) 2001 Clean Air Plan would be reduced to a less than significant level with required mitigation. Mitigation for air quality impacts includes Mitigation Measure AQ-1, which requires alternative transportation and transportation demand management measures; Mitigation Measures AQ-2(a) through AQ-2(g), which require construction activity BMPs, and dust control measures; Mitigation Measure AQ-3, which requires land use emission reduction measures; Mitigation Measure AQ-4, which requires demolition emission control measures; and Mitigation Measure AQ-5, which requires Valley Fever suppression measures to reduce this potential impact to a less than significant level. The project would be consistent with the SLOAPCD’s 2001 Clean Air Plan with incorporation of alternative transportation and transportation demand management measures and land use emission reduction measures (Mitigation Measure AQ-1).

Also, as described in Section IV.I, Air Quality and Greenhouse Gas Emissions, potential impacts associated with project-generated GHG emissions would be reduced to a less than significant level with required mitigation, including GHG emission reduction measures required for all development in the Specific Plan Area (Mitigation Measure GHG-2).

Section V-1, Alternatives, evaluates the potential environmental effects of alternatives to the project, including two alternatives that include fewer residential units. The commenter’s opposition to the project will be forwarded to City decision-makers for review and consideration.

No revisions to the EIR are warranted.
From: Michelle Brown <tuckrox2@gmail.com>
Sent: Tuesday, April 21, 2020 5:38 PM
To: Planning <planning@prcity.com>
Subject: Beechwood housing project/EIR feedback

April 21, 2020

To: Planning Dept, City of Paso Robles

We are very concerned about the timing and impact of the proposed housing project on Creston Road. Our economy is in dire straits due to the Covid-19 crisis, and with so many people unemployed, and considering the project is supposed to be for low income residents, it seems very clear that with so many unemployed, these people will not be able to purchase the homes. Additionally, we are still in a drought here and so many new houses will take an abundance of water, and drive up the water rates for all residents.

A reading the EIR Document for the Beechwood Specific Plan, reveals that the project should be at a minimum reduced to half its intended size.

The number of Class 1 impacts alone are concerning. The number of Class 2 impacts are even more worrisome. Over 900 hundred houses, filled with families and each with an average of 2 vehicles, will not only add a huge impact and detriment to the local environment, it will also tax our overburdened resident services and emergency services. We feel that the project should be put on hold until the current crisis has subsided and a true picture of the local economic forecast can be understood. At the very, very least, the project should be severely scaled back.

Sincerely,
Brian and Michelle Brown
1520 Barley Grain Road
The commenter states that they are concerned with abundance of water, the number of Class 1 and Class 2 impacts, local environment, increased taxes, emergency services availability and the Covid-19 crisis.

The availability of water supply to serve the project is discussed in Master Response 1.

The commenter is concerned with the number of Class I impacts identified in the EIR.

The transportation impacts of the project, including Class I immitigable impacts, are discussed in Master Response 2. A Class I impact is a significant and unavoidable impact that will have an adverse effect on the physical environment that cannot be avoided or reduced to a less than significant level even if reasonable mitigation measures are incorporated. In order for the City to approve the project, a Statement of Overriding Considerations will need to be adopted that identifies specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of the project that outweigh the unavoidable adverse environmental effect.

Section V-1, Alternatives, evaluates the potential environmental effects of alternatives to the project, including two alternatives that include fewer residential units.

The commenter noted the current Covid-19 pandemic and uncertainty of current times are reasons for the project to be on hold, however, the comment does not relate to environmental issues of the project and is beyond the scope of this EIR. The commenter’s opposition to the project will be forwarded to City decision-makers for review and consideration.

No revisions to the EIR are warranted.
From: B B <bb@brigitbinns.com>
Sent: Wednesday, April 22, 2020 9:24 AM
To: Planning <planning@prcity.com>
Subject: Beechwood Specific Plan

To: Planning Dept, City of Paso Robles
While understanding the need for more housing in this community — especially, AFFORDABLE housing, we as a community need to responsibly consider how to move forward.
After viewing the EIR Document for the Beechwood Specific Plan, it is painfully apparent that the project should be at a minimum reduced to half its intended size. The Sherwood Ranch development seems far better planned, and far more appropriate for this community. I appreciate the developers attention to green space and distribution of different type/sizes of housing. Having said that, it seems crazy to be contemplating ANOTHER such a large development in the same time frame.
The number of Class 1 impacts alone are enough to red-flag the Beechwood project. The number of Class 2 impacts should raise the red flag even higher.
Over 900 hundred new dwellings will result in 2000 new vehicles which alone will impact the area in a dangerous way. The report itself states that no mitigation has been identified to deal with a number of these problems. (Class 1)
Access of emergency vehicles (Class 1)
Long-term operational air pollutant emissions. (Class 1)
The Environmental Impact problems are too numerous to mention.
The risk of lyme disease is always a concern when dirt and dust will be disturbed, for years on end. Especially in such close proximity to the school.
I strongly oppose the project as presented.
Respectfully,
Brigit Binns
1981 Barley Grain Road
The commenter states that they desire the project to reduce its density, the number of Class 1 and Class 2 impacts, increased traffic, local environment, emergency services availability and the risk of Lyme disease.

The availability of water supply to serve the project is discussed in Master Response 1.

The commenter is concerned with the number of Class I impacts identified in the EIR. The commenter states that the project will result in 2,000 new vehicles which will have negative impacts.

The transportation impacts of the project, including Class I impacts, are discussed in Master Response 2. A Class I impact is a significant and unavoidable impact that will have an adverse effect on the physical environment that cannot be avoided or reduced to a less than significant level even if reasonable mitigation measures are incorporated. In order for the City to approve the project, a Statement of Overriding Considerations will need to be adopted that identifies specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of the project that outweigh the unavoidable adverse environmental effect.

The TIA prepared for the project analyzes the number of new project trips that would be generated from the project, but not the number of new vehicles. Vehicles per household will vary. The TIA identifies that the project is expected to generate 10,484 new daily trips to locations outside of the project. As noted above, the traffic from the project will result in several Class I projects, for which mitigation is not available.

The Specific Plan area would be served by the City of Paso Robles Police Department as discussed in Section IV.M, Public Services, which would monitor for dangerous traffic situations including speeding, lane violations, and running through stops. However, the commenter’s concerns regarding dangers from new vehicles do not relate to environmental issues of the project and are beyond the scope of this EIR but will be forwarded to City decision-makers for review and consideration.

As described in Section IV.M, Public Services, the project would not trigger the need for the construction of new or updated public service facilities.

The commenter states the risk of Lyme disease, however, according to the CDC, there is no credible evidence that Lyme disease can be transmitted through air, food, water, or from the bites of mosquitoes, flies, fleas, or lice. Only infected ticks that carry the borrelia have that honor. The project’s potential to expose receptors to Coccidioides fungus, which can cause Valley Fever, is evaluated in Section IV.I, Air Quality and Greenhouse Gas Emissions. The project is required to implement Mitigation Measure AQ-2(g) Fugitive Dust Control Measures to reduce this potential impact to a less than significant level.
Section V-1, *Alternatives*, evaluates the potential environmental effects of alternatives to the project, including two alternatives that include fewer residential units. The commenter’s opposition to the project will be forwarded to City decision-makers for review and consideration.

No revisions to the EIR are warranted.
Letter 10

From: Mary Lou Splittorf <mlsplittorf@gmail.com>
Sent: Tuesday, April 21, 2020 1:37 PM
To: Planning <planning@prcity.com>
Subject: Beechwood Project

Planning Dept,

I live on Barley Grain Rd near the planned Beechwood project. I object to the increase in the number of homes projected from 650 to 900.

Traffic: Barley Grain is used as a short cut from Creston Road (cars from the north and east) to reach River Road and head south to 101. Traffic is already too fast through a residential area. Charlois Road cannot handle more traffic at the corner of Charlois and River Road. Traffic backs up now and would not be able to accommodate emergency vehicles during busy times with more cars.

I believe that the city does not have enough services or water to supply 900 more homes.

I do not approve of the project with the number of homes planned.

Mary Lou Splittorf
1980
The commenter states that they oppose the project. They are concerned about increased traffic, city services, water availability and desires lower density housing.

The availability of water supply to serve the project is discussed in Master Response 1.

The commenter notes that Barley Grain Road is used as route to reach River Road and Highway 101 from Creston Road. The commenter states that existing traffic speeds are excessive. The commenter states that the Charolais and River Road intersection experiences traffic congestion and would be unable to accommodate more traffic or emergency vehicles during busy periods.

The project’s potential transportation impacts, including impacts to Charolais Road between Creston Road and South River Road, are discussed in Master Response 2.

The TIA prepared for the project identifies that Barley Grain Road is currently operating at a Level of Service A. Barley Grain Road currently experiences 439 daily trips and is at 5% capacity utilization. Under cumulative conditions, which includes buildout of the project and all other planned projects, Barley Grain Road would continue to operate at a Level of Service A and at 7% capacity utilization.

The Specific Plan area would be served by the City of Paso Robles Police Department as discussed in Section IV.M, Public Services, which would monitor for traffic violations including speeding, lane violations, and running through stops. However, the commenter’s concerns regarding speeding, lane violations, and vehicles running stop signs do not relate to environmental issues of the project and are beyond the scope of this EIR but will be forwarded to City decision-makers for review and consideration.

As described in Section IV.M, Public Services, the project would not trigger the need for the construction of new or updated public service facilities. Through formation of a Community Facilities District a CFD Special Tax would be collected. The CFD finances fire protection services, police protection services, and library services (Resolution 05-063). The City of Paso Robles has adopted the “Special Tax” to finance public services for new development within the CFD. The payment of the special tax is not necessary to reduce impacts to less than significant.

Section V-1, Alternatives, evaluates the potential environmental effects of alternatives to the project, including two alternatives that include fewer residential units. The commenter’s opposition to the project will be forwarded to City decision-makers for review and consideration.

No revisions to the EIR are warranted.
Letter 11

From: Erin Miller <erinmiller.ea@gmail.com>
Sent: Thursday, April 23, 2020 9:21 PM
To: Planning <planning@pricity.com>
Subject: Beechwood Project

To Whom It May Concern,

With all due respect, it is completely irresponsible, reckless, and unsustainable to approve the Beechwood plan as it stands. The city of Paso Robles does not have the infrastructure, in any capacity, to support 900+ new homes. Paso Robles is already lacking jobs, roads, schools, water, police and fire to support the current residents.

Many people who live in Paso Robles commute to their jobs, as there are so few high-paying jobs here. The majority of available jobs in the city revolve around food service and wineries. With the current pandemic, we have proven that even with what used to be a thriving economy, Paso Robles is heavily dependent on tourism. We will be lucky to come out of this pandemic with half of the restaurants and wineries we used to have. Many restaurants and wineries will not survive this economic hardship due to the pandemic, others will have a long way to go to get back up-and-running. It is irresponsible to build 900+ new homes when we have so many people struggling as it is.

Even prior to the pandemic, we had so many people commuting to their jobs that traffic on Highway 101 Northbound was at a gridlock every weekday between Atascadero and Paso Robles in the late afternoons. With commuting aside, the traffic in town has been atrocious, especially the last few years. The Niblick Bridge and the 13th Street Bridge are always backed up in the mornings and late afternoons. With the increase in traffic on the bridges, many people have already switched to driving the back roads, and even that doesn’t seem to be easing the traffic in town. The additional 900+ homes in the Beechwood area will increase the traffic through my neighborhood, throughout the town, and the community, exponentially.

Even though the Beechwood plan has included an elementary school, our current high school, and school district, for that matter, cannot support an additional 900+ homes. Our schools are overcrowded as it is. As you’re likely aware, Bauer Speck just closed its doors, which will put a strain on the current elementary schools. I realize that the Beechwood project would add an elementary school, but our classrooms were already over capacity. We would need the elementary school in Beechwood just to get back to what we had with our current population. Our high school has been overcrowded since before my time, with funding and staffing issues only increasing. The school district has been unable to balance their budget for years and adding more students will not make that problem any better. It is irresponsible to add 900+ more homes and expect our high school to be able to accommodate the extra students, even if it is only a small percentage. The school district’s funding has been decreasing and they have been cutting beneficial programs for several years.

We have been in a water crisis for quite some time and it would be extremely irresponsible to add 900+ new homes to only add to the problem. There is simply no way adding 900+ homes could ever help the water situation that we are facing. For years, we have been forced to conserve water and let our lawns and landscaping die, while wineries get priority and are adding acres of vines, further depleting our water table at an alarming rate. The current residents need to be taken care of before we add 900+ homes.

With the infrastructure of Paso Robles and the surrounding community, it is completely irresponsible to allow 900+ homes to be built in the Beechwood project. It is shocking that this project was approved at all. At the very least, this project should be cut in half and a new bridge and freeway on-ramps should be added. Even still, it doesn’t address the water supply issue nor the school district issue. Building more homes does not make housing more affordable if there is no infrastructure to support them.

Respectfully,
Erin Miller
1480 Barley Grain Road

BEECHWOOD SPECIFIC PLAN FINAL EIR

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The commenter states that they oppose the project. They are concerned about increased traffic, city infrastructure, local jobs, over crowded schools, city services, water availability and desires lower density housing.

The availability of water supply to serve the project is discussed in Master Response 1.

The commenter states concern that Paso Robles is currently lacking streets to support existing residents. The commenter notes existing traffic on Highway 101 northbound between Atascadero and Paso Robles during afternoon hours. The commenter notes existing traffic on Niblick Bridge and 13th Street Bridge during the morning and afternoon hours. The commenter notes that many people use backroads to avoid traffic. The commenter states that the project will increase traffic in the City and her neighborhood of Barley Grain Road. The commenter states a preference for new Highway 101 on-ramps.

The project’s potential transportation impacts, including impacts to the Salinas River bridges, are discussed in Master Response 2.

The TI/A prepared for the project identifies that Barley Grain Road is currently operating at a Level of Service A. Barley Grain Road currently experiences 439 daily trips and is at 5% capacity utilization. Under cumulative conditions, which includes buildout of the project and all other planned projects, Barley Grain Road would continue to operate at a Level of Service A and at 7% capacity utilization.

The commenter states that an additional high school should be planned for to offset traffic concerns and better serve residents of the community. As described in Section IV.M, Public Services, the project would require payment of state-mandated impact mitigation fees, which provide funding for new and expanded school services. Payment of required state-mandated impact mitigation fees and inclusion of a school site overlay for an elementary school in the Specific Plan would ensure the project’s potential impacts to public schools would not be significant. The commenter’s recommendation that the project include a new high school does not relate to environmental issues of the project and is beyond the scope of this EIR but will be forwarded to City decision-makers for review and consideration.

As described in Section IV.M, Public Services, the project would not trigger the need for the construction of new or updated public service facilities. Through formation of a Community Facilities District a CFD “Special Tax” would be collected. The CFD finances fire protection services, police protection services, and library services (Resolution 05-063). The City of Paso Robles has adopted the “Special Tax” to finance public services for new development within the CFD. The payment of the special tax is not necessary to reduce impacts to less than significant.

As discussed in Section VI.A, Growth Inducement, growth projections for the City of Paso Robles completed by the San Luis Obispo Council of Governments (SLOCOG) indicate that
the City of Paso Robles will grow by approximately 6,299 new residents and 2,916 housing units by the year 2050. Therefore, population growth associated with the project would not exceed local and regional growth projections. The project would not result in the establishment of open space/vacant land in isolated areas that could induce growth at the City’s periphery or result in the removal of an impediment for growth within the City of Paso Robles, as adequate access and services are already available for the adjacent and surrounding areas in the City.

Section V-1, Alternatives, evaluates the potential environmental effects of alternatives to the project, including two alternatives that include fewer residential units. The commenter’s opposition to the project will be forwarded to City decision-makers for review and consideration.

No revisions to the EIR are warranted.
To Whom It May Concern:

We, the undersigned, are strongly opposed to the Beechwood project in its current proposed state for the following reasons:

One, the city does not have the infrastructure to support proposed development.

Additional traffic should be addressed and a plan implemented before additional cars are on the road.

The subject of traffic across the Salinas River needs to be addressed and implemented.

Police and fire services, especially with impacted traffic corridors has to be resolved.

How will our water supplies be affected?

We live on Barley Grain Road. We have already had to lower our well pump 100 feet as a result of Creston Road water demand. We have several neighbors who have experienced this as well.

The speed limit on Barley Grain is 55 mph. We are a rural neighborhood and already our road has become a corridor for the Templeton area and beyond. Our road was already dangerous with its curves, narrow parts and this high speed, and additional traffic even more so.

This development will have a profound impact on our quality of life.

Respectfully,

John and Cindy Poole
1688 Barley Grain Rd
Paso Robles, Ca.
The commenter states that they oppose the project. They are concerned about increased traffic, city infrastructure, water availability and emergency services.

The availability of water supply to serve the project is discussed in Master Response 1.

The commenter expresses a preference that a traffic plan be implemented before project traffic is allowed. The commenter states that traffic across the Salinas River needs to be addressed and implemented. The commenter notes that the speed limit on Barley Grain is 55 MPH. The commenter notes that Barley Grain is used for traffic beyond the rural neighborhood. The commenter notes that Barley Grain is dangerous due to alignment, width, and speed, and that the project traffic will increase the danger.

The project’s potential transportation impacts, including impacts to the Salinas River bridges, are discussed in Master Response 2.

In addition to payment of TIF fees, the project will be required to complete several improvements to several roadway intersections including Creston Road/Stoney Creek Road, Creston Road/Meadowlark Road, South River Road/Charolais Road, South River Road/Riverbank Lane, 13th Street/Riverside Avenue, 13th Street/Paso Robles Street, Niblick Road/South River Road, Creston Road/Charolais Road, and North River Road/Creston Road, in addition to improvements at Virginia Peterson Elementary School, and bike lane improvements on Meadowlark Road (Reference Mitigation Measure TR-3(b), TR-4(a), TR-4(b), TR-6, TR-20, TR-28, and TR-29.) Additionally, Mitigation Measure TR-1 requires that the applicant prepare a Traffic Control Plan to manage traffic during construction of the project. The Mitigation Monitoring Reporting Program included in the Final EIR identifies these mitigation measures, required timing for completion, and the compliance mechanism.

Barley Grain road is a 30’ wide, two lane road that includes asphalt dykes and shoulders. The Road was permitted and constructed with oversight of San Luis Obispo County. The TIA prepared for the project identifies that Barley Grain Road is currently operating at a Level of Service A. Barley Grain Road currently experiences 439 daily trips and is at 5% capacity utilization. Under cumulative conditions, which includes buildout of the project and all other planned projects, Barley Grain Road would continue to operate at a Level of Service A and at 7% capacity utilization.

The Specific Plan area would be served by the City of Paso Robles Police Department as discussed in Section IV.M, Public Services, which would monitor for dangerous traffic situations including speeding, lane violations, and running through stops. However, the commenter’s concerns regarding dangers from existing vehicles do not relate to environmental issues of the project and are beyond the scope of this EIR but will be forwarded to City decision-makers for review and consideration.
As described in Section IV.M, Public Services, the project would not trigger the need for the construction of new or updated public service facilities. Through formation of a Community Facilities District a CFD Special Tax would be collected. The CFD finances fire protection services, police protection services, and library services (Resolution 05-063). The City of Paso Robles has adopted the “Special Tax” to finance public services for new development within the CFD. The payment of the special tax is not necessary to reduce impacts to less than significant.

Regarding the concern for City infrastructure and maintenance, the City’s Public Works Department includes a Street Maintenance Division, which is responsible for maintaining roads within the City limits. The CIP identifies necessary improvement projects for long-term road maintenance. Short-term road repairs occur, as needed, through public service requests. The commenter’s concern regarding the implementation of road maintenance does not relate to environmental issues of the project and is beyond the scope of this EIR but will be forwarded to City staff for review and consideration.

No revisions to the EIR are warranted.
Dear Leaders and Mr. Martin,

Regarding the Beechwood EIR and both the Beechwood and Olsen Projects: the EIR seems to confirm what many of us citizens have been asking you to pay attention to. Our traffic studies show we have some terrible situations to begin with, and we all know we have some horrible roads. Adding thousands of houses won’t help and will be extremely costly to deal with. Who will pay for the improvements needed? How long will they take? Since there is no way to deny this, how can you allow so many houses to be built?

Who will be paying for the millions of dollars needed to add water improvements, sewer, fire and police services? We have asked about this repeatedly and still no answer. The city can’t keep up with costs as it is.

With the developers being allowed to proceed how they see fit, how long will these projects be drawn out? Dust, noise, garbage, ruined views will linger for many years it sounds like.

What about Valley Fever? My doctor is concerned as I am immunosuppressed and there is a very real possibility that spores will be kicked up in development. I’m not just a little concerned, but this is a very real issue. As a teacher, I had a student contract it last year and he was out of school for four months. How will the developers mitigate the risk for everyone surrounding all these projects? There is no risk if the soil is not disturbed, but a very real one if it is. Why did you not test the soil?

We are very skeptical of course, especially since you keep asking for input but keep pushing forward despite citizens’ concerns. We believe some of our leaders have too much of a personal interest in these developments/developers.

What these developers are proposing will forever change the quality of life for everyone who has grown up here, works here and raised our families here. At various meetings I have heard more than one of your say that past leaders were guilty of “kicking the can” down the road to the next leaders. This is a prime example of kicking very many cans down the road to current and future citizens of Paso Robles.

I hope the charrettes you offered actually meant something, as many people showed up and offered their opinions. I hope it hasn’t all been for show.

Bonita and Jerry Camacho
Letter 13

COMMENTER: Bonita and Jerry Camacho

DATE: April 23, 2020

The commenter states that they oppose the project. They are concerned about increased traffic, city infrastructure, valley fever and emergency services.

The commenter states concerns regarding existing road conditions. The commenter raises concerns about maintenance and improvement costs to local roads and timing of such improvements.

The project’s potential transportation impacts are discussed in Master Response 2 and Section IV.G, Transportation/Traffic.

The fees required for the project under the City’s TIF program include the costs anticipated to improve roadways to meet the expected traffic demand created by the project. In addition, the City’s Public Works Department includes a Street Maintenance Division, which is responsible for maintaining roads within the City limits. The City’s Capital Improvement Plan identifies necessary improvement projects for long-term road maintenance. Short-term road repairs occur, as needed, through public service requests. The commenter’s concerns regarding road maintenance do not relate to environmental issues of the project and are beyond the scope of this EIR but will be forwarded to City staff for review and consideration.

In additional to payment of TIF fees, the project will be required to complete several improvements to several roadway intersections including Creston Road/Stoney Creek Road, Creston Road/Meadowlark Road, South River Road/Charolais Road, South River Road/Riverbank Lane, 13th Street/Riverside Avenue, 13th Street/Paso Robles Street, Niblick Road/South River Road, Creston Road/Charolais Road, and North River Road/Creston Road, in addition to improvements at Virginia Peterson Elementary School, and bike lane improvements on Meadowlark Road (Reference Mitigation Measure TR-3(b), TR-4(a), TR-4(b), TR-6, TR-20, TR-28, and TR-29.)

As described in Section IV.M, Public Services, the project would not trigger the need for the construction of new or updated public service facilities. Through formation of a Community Facilities District a CFD Special Tax would be collected. The CFD finances fire protection services, police protection services, and library services (Resolution 05-063). The City of Paso Robles has adopted the “Special Tax” to finance public services for new development within the CFD. The payment of the special tax is not necessary to reduce impacts to less than significant.

As discussed in Section VI.A, Growth Inducement, growth projections for the City of Paso Robles completed by the San Luis Obispo Council of Governments (SLOCOG) indicate that the City of Paso Robles will grow by approximately 6,299 new residents and 2,916 housing units by the year 2050. Therefore, population growth associated with the project would not exceed local and regional growth projections. The project would not result in the establishment of open space/vacant land in isolated areas that could induce growth at the City’s periphery or result in the removal of an impediment for growth within the City of Paso Robles.
Robles, as adequate access and services are already available for the adjacent and surrounding areas in the City.

The project’s potential to expose receptors to Coccidioides fungus, which can cause Valley Fever, is evaluated in Section IV.I, *Air Quality and Greenhouse Gas Emissions*. The project is required to implement Mitigation Measure AQ-2(g) Fugitive Dust Control Measures to reduce this potential impact to a less than significant level.

Section V-1, *Alternatives*, evaluates the potential environmental effects of alternatives to the project, including two alternatives that include fewer residential units. The commenter’s opposition to the project will be forwarded to City decision-makers for review and consideration.
Hello,

I own my property at 1450 Barley Grain, and have for 10 years. I am against the Beechwood project, and ask how does the city expect to pay for the additional service needs to this goal of adding 25% to the current population (up to 44,000), if it cannot meet its current needs?

This is a real concern and should be answered by the City BEFORE the build-out. So often municipalities, gov'ts want the build-out first, to get the tax dollars, then have to scramble to do the roads, fire, water, police etc, this should not be the case. Barley again will be negatively affected by this project and should not bare the burden of excess traffic.

Sincerely,

Janis Pelletiere Denner
Pelletiere Estate Vineyard & Winery
Pelletiere.com
The commenter states that they oppose the project. The commenter states that Barley Grain Road will be negatively impacted by the project and should not be burdened by additional traffic.

The TIA prepared for the project identifies that Barley Grain Road is currently operating at a Level of Service A. Barley Grain Road currently experiences 439 daily trips and is at 5% capacity utilization. Under cumulative conditions, which includes buildout of the project and all other planned projects, Barley Grain Road would continue to operate at a Level of Service A and at 7% capacity utilization.

No revisions to the EIR are warranted.

As described in Section IV.M, Public Services, the project would not trigger the need for the construction of new or updated public service facilities. Through formation of a Community Facilities District a CFD Special Tax would be collected. The CFD finances fire protection services, police protection services, and library services (Resolution 05-063). The City of Paso Robles has adopted the “Special Tax” to finance public services for new development within the CFD. The payment of the special tax is not necessary to reduce impacts to less than significant.

Section V-1, Alternatives, evaluates the potential environmental effects of alternatives to the project, including two alternatives that include fewer residential units. The commenter’s opposition to the project will be forwarded to City decision-makers for review and consideration.
April 23, 2020

Darren Nash, City Planner
City of Paso Robles, Community Development Department
1000 Spring Street
Paso Robles, California 93446

Subject: Beechwood Specific Plan–Draft Environmental Impact Report (DEIR)

State Clearinghouse #2018061064

Dear Mr. Nash:

The San Luis Obispo Council of Governments (SLOCOG) appreciates the opportunity to review the Draft Environmental Impact Report (DEIR) for the Beechwood Specific Plan. The State of California and Federal Highways Administration designate SLOCOG as the Regional Transportation Planning Agency (RTPA) and the Metropolitan Planning Organization (MPO), respectively, for the region. While SLOCOG does not have permit or regulatory authority for land use proposals, SLOCOG is responsible for planning the long-term viability of the regional surface transportation system, and for programming funds to achieve the objectives of the adopted Regional Transportation Plan and Sustainable Communities Strategy.

SLOCOG staff review EIRs and Specific Plans to ensure positive outcomes in transportation choices, mobility, circulation, efficiency, safety and connectivity within and between our communities. SLOCOG’s 2019 RTP includes a forecasted development pattern and intermodal transportation investment portfolio that meet greenhouse gas (GHG) emission reduction targets specified by the California Air Resources Board. The 2019 RTP includes numerous principles, goals, and policies that were used to prepare the following comments; and is the blueprint for our region’s future transportation system. The 2019 RTP strives to accommodate growth while improving quality of life for the region’s residents.

The proposed 234.8-acre Beechwood Specific Plan includes the development of 911 residential units including at least 150 multi-family residential units, approximately 5.6-acres of commercial/mixed-use development, approximately 8-acre public park, and approximately 20-acres of open space. Airport Road is also proposed to be extended from Meadowlark Road to connect with Creston Road.

After reviewing the Beechwood Specific Plan DEIR, SLOCOG would like to see the following additions be considered to align more closely with the 2019 RTP action strategies. The modification addressing the following comments will contribute to the goal of fostering livable, healthy communities. SLOCOG respectfully submits the following transportation, land use, and housing comments.

TRANSPORTATION COMMENTS

SLOCOG concurs with the following Mitigation Measures from Class 1 impacts, these are:

- TR-2 Fair Share Funding for Caltrans Intersection (#3) Improvements
  - The applicant shall contribute their fair share amount through the City’s Transportation Impact Fee (TIF) program, for the ultimate improvements on SR 46E, consistent with the RTP, which consist of restricting left turns on SR 46E at Union Road.
- TR-6 Implementation of Improvements at Niblick Road/South River Road (#17)
- TR-8 Fair Share Funding for Intersection (#4) Improvements
- TR-13 Fair Share Funding for Intersection (#16) Improvements
• TR-16(a) Fair Share Funding for Caltrans Intersection (#2) Improvements
• TR-16(b) Fair Share Funding for Riverside Avenue/Pine Street/US 101 Southbound Ramps (#15) Improvements

SLOCOG concurs with the following Mitigation Measures from the Class 2 impacts, these are:

• TR-1 Traffic Control Plan
• TR-3(a) Fair Share Funding for Intersection (#6) Improvements
• TR-3(b) Implementation of Improvements for Intersections (#12, #13, #18, #20)
• TR-4(a) Implementation of Improvements at 13th Street/Riverside Avenue (#7)
• TR-4(b) Implementation of Improvements at 13th Street/Paso Robles Street (#8)
• TR-10 Implementation of Improvements at Creston Road/Charolais Road (#14)
• TR-11 Fair Share Funding for Intersection (#11) Improvements
• TR-20 Implementation of Improvements at North River Road/Creston Road (#9)
• TR-28 Implementation of Improvements at Virginia Peterson Elementary School
• TR-29 Implementation of Bike Lane Improvements
  o To mitigate impacts, Class II bike lanes shall be installed on Meadowlark Road.

VEHICLE MILES TRAVELED COMMENTS

AQ-1c and d
  □ A goal of the 2019 RTP is to provide reliable, integrated, and flexible travel choices across and between modes. SLOCOG supports making Mitigation Measure (AQ-1) c and d more inclusive of the entire Beechwood Specific Plan community. SLOCOG suggests restating the mitigation measures as follows:
    o “c. Develop an educational program with San Luis Obispo Regional Rideshare to provide occupants of nonresidential uses with alternative transportation and smart commute information (e.g., transportation board, electronic kiosk, new hire packets, web portal, newsletters, social media, etc.).”
    o “d. Working with SLO Regional Rideshare, incorporate a goal/policy into the Specific Plan to implement programs that reduce both residential and non-residential VMT within the Beechwood Development (e.g., incentives; SLO Regional Rideshare trip reduction program; bicycle share programs; shuttles/vanpools; on-site employee lockers, showers, housing; alternative employee schedules [e.g., 9/80s, 4/10s, telecommuting, satellite worksites, etc.]).”

SB 375
  □ As stated under the SLOCOG 2019 RTP section on page IV.1-50, “In 2018, CARB adopted more aggressive SB 375 targets as a means of supporting progress toward the 2017 Scoping Plan goals. For the SLOCOG region, CARB set passenger vehicle GHG reduction targets of an 8 percent decrease in per capita VMT by 2020 and an 8 percent decrease in per capita VMT by 2035.”
    o Under Impact GHG-2 in reviewing consistency with SLOCOG’s 2019 Regional Transportation Plan (RTP) and Sustainable Communities Strategy (SCS) the document makes an erroneous reference to SLOCOG’s SB 375 targets for the region. The document states that under SB 375 CARB set passenger vehicle GHG reduction targets of an 8 percent decrease in per capita VMT by 2020 and an 8 percent decrease in per capita VMT by 2035. SB 375 targets are in units of percent per capita reduction in GHG emissions relative to 2005, not VMT. This error is then used to reference VMT targets set by SLOCOG within the 2019 RTP and SCS. SLOCOG did not set VMT targets in the 2019 RTP and SCS. This error is also repeated in the Under Significance After Mitigation section (pg. IV.1-53) which states that SLOCOG’s 2019 RTP contains VMT targets for 2024 and 2035. Additionally, the document
references the previous SB 375 reduction targets for the SLOCOG region. The 8 percent reduction for years 2020 and 2035 were the initial targets set by CARB. CARB updated the SB 375 GHG reduction targets in 2018 to a 3 percent reduction for year 2020 and an 11 percent reduction for year 2035. The 2019 RTP and SCS incorporates the updated targets for the region. Evaluation of consistency with SLOCOG’s 2019 RTP, SCS, and SB 375 targets should reflect the updated targets.

GENERAL COMMENTS
- On page IV.G-16, it is stated that “the RTP is updated every 4.5 years, and starting with the 2014 RTP, SLOCOG has developed a Sustainable Communities Strategy (SCS) that identifies land use patterns expected to reduce vehicle miles traveled (SLOCOG 2015).” Please change 5 years to 4 years.
- On page IV.G-85, please correct SLOCOG’s name, “San Luis Obispo County Council of Governments.”
- On page IV.G-86, the 2014 Regional Transportation Plan/Sustainable Communities Strategy was referenced. Please correct to reference the 2019 RTP/SCS.
- Note 1 of Table IV.N-5 on page IV.N-7, “1. SLOCOG 2050 2040 Housing Unit Projections based on housing units.” Please correct the year to 2050.

HOUSING COMMENTS
Regional Housing Needs Assessment (RHNA)
- Page IV.L-9 states, “The most recent RHNA was prepared in 2013 as part of the Regional Housing Needs Plan (SLOCOG 2013). This document identified a City of Paso Robles housing unit allocation of 492 units by the following income levels: 123 units for Very Low Income; 77 units for Low Income; 87 units for Moderate Income; and 206 units for Above Moderate Income.” SLOCOG suggests updating the 2013 numbers to align with 2019 Regional Housing Needs Assessment (RHNA) - As of October 2019, the region is now working to fulfill the 2019 RHNA.

L-3 Balancing Jobs and Housing. Within cities and unincorporated communities, the gap between the availability of jobs and housing should be narrowed and should not be allowed to expand.
- 2001 CAP Control Measure L-3 Balancing Jobs and Housing - The L-3 Consistency response states “According to San Luis Obispo Council of Governments’ 2019 Regional Housing Needs Assessment Proposed Final Plan, Paso Robles has approximately 27% more jobs than housing units” (p.IV.I-27). While it is true that the adopted 2019 RHNA Plan identified a ratio 1.27:1 (p.17) jobs to homes in Paso Robles and that developing more homes will bring the ratio closer to 1, this does not equate to “supporting and promoting local and regional improvements related to increased transportation mobility and reductions in VMT.” The RHNA Plan and the 2019 RTP both promote and identify improved jobs/housing balances within each of the subregions by distributing more homes, of all income levels, into the “jobs-rich” subregion. The RTP goes a step further by including a future development pattern that distributes more jobs, along with necessary investments, into the “housing-rich” subregions (this includes the North County). This results in all subregions moving in the direction of a better jobs/housing ratio (2019 RHNA Plan, p.13). The RHNA Plan identifies that the North County Subregion has a Jobs/Housing ratio of 0.87; indicating the need for more job opportunities. Since rural areas and smaller communities are not expected to offer 1:1 job for each home, the subregion (and the region) benefits when the cities ratio is notably greater than 1:1. If imbalance in north county subregion continues at 0.87 or worsens, one result will be increased congestion on our highways. By 2035, the 2019 RTP (p.13-15) distributed nearly 6,000 new jobs in the North County subregion which leads to a small improvement of jobs to homes ratio at 0.89. SLOCOG encourages increasing jobs in Paso Robles and the North County.

Thank you again for the opportunity to provide input. We wish you and all parties involved continued success in moving the Project forward. It is hoped the City of Paso Robles will consider advancing the transportation choices.
available. There should be close coordination between RTA, SLOCOG, SLO Regional Rideshare, the City of Paso Robles and the developer to continue to refine improvements and identify solutions to any inevitable impacts.

Please do not hesitate to contact Sara Sanders for housing issues at (805) 781-8052 or ssanders@slocog.org or John DiNunzio for traffic/transportation issues at (805) 781-5764 or jdinunzio@slocog.org.

Sincerely,

Sara Sanders, Transportation Planner                                      John DiNunzio, Regional Transportation
San Luis Obispo Council of Governments                                    San Luis Obispo Council of Governments

CC: Jacqueline Mansoor, APCD
    Jenna Schudson, Caltrans
Letter 15

COMMENTER: SLOCOG

DATE: April 23, 2020

The commenter provided specific questions regarding transportation, VMT, housing and general. Below is the response to the various items, the topic is provided as related to the topic in the letter

Transportation Comments

- The commenter restates the project description and the role of SLOCOG in developing the 2019 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The commenter states that their letter describes site modifications that would contribute to achieving the objectives of the 2019 RTP/SCS.

- The commenter states that they concur with the Mitigation Measures for the Class I and Class II traffic impacts.

- The commenter’s concurrence with the traffic-related Mitigation Measures will be forwarded to City decision-makers for review and consideration.

Vehicle Miles Traveled Comments

- SLOCOG supports making Mitigation Measure (AQ-1) c and d more inclusive of the entire Beechwood Specific Plan community. AQ-1c and d comments were revised.
  
  c. Incorporate a goal/policy into the Specific Plan to Develop an educational program with San Luis Obispo Regional Rideshare to provide occupants of non-residential uses with alternative transportation and smart commute information (e.g., transportation board, electronic kiosk, new hire packets, web portal, newsletters, social media, etc.). (pg IV.I-30)

  d. Working with SLO Regional Rideshare, incorporate a goal/policy into the Specific Plan to implement programs that reduce both residential and non-residential VMT within the Beechwood Development. Incorporate a goal/policy into the Specific Plan to implement programs to reduce employee VMT at non-residential uses (e.g., incentives; SLO Regional Rideshare trip reduction program; bicycle share programs; shuttles/vanpools; on-site employee lockers, showers, housing; alternative employee schedules [e.g., 9/80s, 4/10s, telecommuting, satellite worksites, etc.]). (pg IV.I-30)

- The commenter states the evaluation of consistency with SLOCOG’s 2019 RTP, SCS, and SB 375 targets should reflect the updated targets. SB 375 comments were revised see below.

For the SLOCOG region, CARB set passenger vehicle GHG reduction targets of an 8% decrease in per capita VMT by 2020 and an 11% decrease in per capita VMT by 2035. Therefore it is assumed a decrease in GHG emission will be relative in the future. This equates to a reduction from 22.7 daily VMT per capita in 2005 to 20.7 daily VMT per capita for 2035 (SLOCOG 2019). Assuming a linear reduction in daily VMT per capita, the target reduction for 2024 (the project’s buildout year) would equate to a daily rate of approximately 21.4 VMT per capita. (Page IV.I-50)
• The comments related to consistency with Sustainable Communities Strategy (SCS) subsequently required revisions to pages IV. G-16. The reference to SCS and other minor typos have been revised as recommended.

General Comments

• On page IV.G-16 states that

Housing Comments

• SLOCOG suggests updating the 2013 numbers to align with 2019 Regional Housing Needs Assessment (RHNA). All comments were revised see below.

The State of California requires that each jurisdiction plan for its share of the housing for people of all housing income levels. The Regional Housing Needs Allocation (RHNA) is a process where each community is assigned a share of housing needs for an eight-year period. The City of Paso Robles participates in this process as part of the Council of Governments for the San Luis Obispo region. The most recent RHNA was prepared in 2019 as part of the Regional Housing Needs Plan (SLOCOG 2013). Section 5.1 of the Housing Element cites Regional Housing Needs Allocation requirements for the Beechwood area as 120 units at a minimum density of 20 du/ac for Low and Very Low Income groups and 550 units at a minimum density of 3 du/ac for Above Moderate income groups. The allocation for the Beechwood Plan Area cited in the Housing Element is based on the SLOCOG April 2013 RHNA Plan. The 2019 Regional Housing Needs Allocation Proposed Final Plan, released in August 2019, indicates an increase in housing needs for the region and the City of Paso Robles between 2019 and 2028. This document identified a City of Paso Robles housing unit allocation of 492 units by the following income levels: 123 units for Very Low Income, 77 units for Low Income, 87 units for Moderate Income, and 206 units for Above Moderate Income. (Page IV.1-9)

• SLOCOG encourages increased jobs in Paso Robles and North County therefore the potential for commercial/retail use is acceptable.
Via Email

April 24, 2020

Darren Nash
City of Paso Robles Community Development Department
1000 Spring St.
Paso Robles, CA 93446
dnash@prcity.com

SUBJECT: APCD Comments Regarding the Beechwood Specific Plan Project

Dear Mr. Nash:

Thank you for including the San Luis Obispo County Air Pollution Control District (APCD) in the environmental review process. We have completed our review of the proposed project located on the east side of Beechwood Drive, between Meadowlark Road and Creston Road in Paso Robles.

The proposed project includes:

- 911 dwelling units
- 8.1 acres of public park space
- 10.1 acres of green open space that includes trails, landscaped amenities and play areas
- 10.2 acres of conserved open space
- 47,000 square-feet of mixed-use commercial

The project would require approximately 470,000 cubic yards of cut and fill with up to 20,000 cubic yards of import, pending final adjustment for soil shrinkage and bulking.

The following comments are formatted into 2 sections — (1) Air Quality and (2) Greenhouse Gas (GHG) Emissions. Comments pertain to information stated in the DEIR. The lead agency may contact the APCD Planning Division for questions and comments at 805-781-5912.

(1) Air Quality

Impact AQ-1: The project does not incorporate all applicable land use strategies and transportation control measures contained in the APCD’s 2001 Clean Air Plan (CAP) and would therefore

[Contact information and additional text]
be inconsistent with the 2001 CAP. This impact would be less than significant with mitigation incorporated (Class II) (DEIR, page IV.I - 26).

The APCD would like to echo the comments in SLOCOG’s letter and state letter c and d under Air Quality mitigation measure 1 (AQ-1) on page IV.I-29 should be more inclusive of the entire Beechwood Specific Plan community. SLOCOG suggests restating the mitigation measures as follows:

c. Develop an educational program with San Luis Obispo Regional Rideshare to provide occupants of nonresidential uses with alternative transportation and smart commute information (e.g., transportation board, electronic kiosk, new hire packets, web portal, newsletters, social media, etc.).
d. Working with SLO Regional Rideshare, incorporate a goal/policy into the Specific Plan to implement programs that reduce both residential and non-residential VMT within the Beechwood Development (e.g., incentives; SLO Regional Rideshare trip reduction program; bicycle share programs; shuttles/vanpools; on-site employee lockers, showers, housing; alternative employee schedules [e.g., 9/80s, 4/10s, telecommuting, satellite worksites, etc.]).

Impact AQ-2: Construction of the project would generate temporary increases in criteria air pollutant emissions. Construction emissions would exceed the APCD’s construction thresholds. Impacts would be Class II, less than significant with mitigation incorporated (DEIR, page IV.I-30).

On page IV.I-31, the DEIR states:

modeling of construction emissions assumed that construction would occur continuously over a period of 21 months (inclusive of all ground disturbing and construction activities), which is a conservatively brief timeframe based on the size of the Plan Area and scale of proposed development in the Plan Area. Construction would likely occur discontinuously or over a longer duration (buildout is estimated to occur over 9 years), which would result in lower daily air pollutant emissions than shown in Table IV.I-7.

The DEIR explains construction of the project would likely occur over a nine-year period. The CalEEMod output files in Appendix E reflect this as winter and annual “typical phases” represent about a ninth of the total buildout of the project, excluding the “retail shopping center”. The APCD was not readily able to match the “typical phases” construction modeling results shown in DEIR Tables IV.I-7 & 8 with either of the unmitigated or mitigated CalEEMod modeling results found in PDF pages 461 to 718 in the DEIR file entitled Appendix - Volume I with corrected SP document. APCD recommends that a clarification of where the table values came from be added to the DEIR. Also, the APCD has the following concerns that may make it necessary to update the emission values in these tables:

If a “typical phase” will take 7 quarters to complete and there would be 9 phases over 9 years, then the phases would overlap and therefore reporting a “typical phase” emissions in the tables do not seem to represent a reasonable worst-case emissions scenario. Additionally, if the “retail shopping center” were to be built during one of the “typical phases,” the resulting emissions would represent a reasonable worst-case emissions scenario. Please clarify what is anticipated to be the reasonable worst-case scenario and update Tables IV.I-7 & 8 and mitigation measures if necessary.
On page I-32 in the DEIR, it states up to 20,000 cubic yards of import would be needed. However, on page IV-I-32, it states “the project’s dust emissions would not exceed the daily threshold or quarterly Tier 1 threshold primarily because no soil material transport would be required...”. Please clarify whether soil would or would not need to be imported and if needed please clarify whether the construction emission calculations accounted for the import of soil.

The APCD generally agrees that mitigation AQ-2(b) Standard Control Measures for Construction Equipment, AQ-2(c) Architectural Coating, AQ-2(e) Idling Restrictions, and AQ-2(g) Fugitive Dust Control Measures would be appropriate given the estimated construction emissions shown in the modeling for this project. However, please account for the reasonable worst-case construction phase emissions as described above to better assess whether AQ-2(a) Construction Activity Management Plan (CAMP), AQ-2(c) Best Available Control Technology for Construction, and AQ-2(f) Off-Site Mitigation are appropriate mitigation measures for this project. These mitigation measures are needed when construction phase emissions exceed thresholds as presented in the table below. Finally, since actual construction phase impacts may differ from the assumptions in the DEIR modeling estimates, the use of a CAMP could be appropriate to have the project to reassess the actual construction phase impacts and appropriate mitigation when the actual fleet and construction schedule is known.

<table>
<thead>
<tr>
<th>Standard Mitigation Measures for Construction Equipment</th>
<th>Use if project meets any of the following:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>• Exceeds ROG+NOx Daily threshold</td>
</tr>
<tr>
<td></td>
<td>• Last fewer than 90 days and</td>
</tr>
<tr>
<td></td>
<td>exceeds DPM Daily threshold</td>
</tr>
<tr>
<td></td>
<td>• Last more than 90 days and</td>
</tr>
<tr>
<td></td>
<td>exceeds ROG+NOx and/or DPM Tier 1</td>
</tr>
<tr>
<td></td>
<td>quarterly threshold(s)</td>
</tr>
<tr>
<td></td>
<td>• Last more than 90 days and</td>
</tr>
<tr>
<td></td>
<td>exceeds ROG+NOx and/or DPM Tier 2</td>
</tr>
<tr>
<td></td>
<td>threshold(s)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Best Available Control Technology (BACT) for Construction Equipment</th>
<th>Use if project would last more than 90 days and meets any of the following after Standard Mitigation Measures are applied:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>• Exceeds ROG+NOx and/or DPM Tier 1 quarterly threshold(s)</td>
</tr>
<tr>
<td></td>
<td>• Exceeds ROG +NOx and/or DPM Tier 2 threshold(s)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Construction Activity Management Plan (CAMP)</th>
<th>Use if project would last more than 90 days and meets the following after Standard Mitigation Measures and BACT Measures are applied:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>• Exceeds ROG+NOx and/or DPM Tier 2 threshold(s) and</td>
</tr>
<tr>
<td></td>
<td>• Exceeds Fugitive PM10 Tier 1 threshold (in some cases)³</td>
</tr>
</tbody>
</table>
Construction Phase Offsite Mitigation | Use if project would last more than 90 days and meet any of the following after Standard Mitigation and BACT Measures are applied:

- Exceeds ROG+NOx Tier 1 threshold (if feasible mitigations are not implemented, or no mitigation measures are feasible)
- Exceeds ROG+NOx Tier 2 threshold(s)
- DPM Tier 2 exceedances must be mitigated on-site

**Impact AQ-3:** Operation of the project would generate long-term operational air pollutant emissions that would exceed the APCD’s daily emission thresholds for ROG + NOx and Diesel Particulate Matter (DPM). Implementation of the APCD’s standard mitigation measures would reduce emissions to the extent feasible. However, impacts would remain Class 1, significant and unavoidable (DEIR, page IV.1-38).

The estimated daily and annual operational phase emission impacts for the project at buildout are presented in Tables IV.1-8 and 9. The daily emissions are anticipated to exceed the APCD’s daily threshold of 25 lbs of ROG + NOx per day by about 80 lbs. For impacts of this scale, Table 3-4 in the [AQG Air Quality Handbook](April 2012) calls for all feasible operational phase mitigation measures to be applied to the project. The APCD recommends that the DEIR document how Mitigation Measures AQ-1 Alternative Transportation and Transportation Demand Management Measures and AQ-3 Land Use Emission Reduction Measures represent all feasible measures for the project. If other feasible applicable measures are identified during this documentation, then they should be added to AQ-1 or AQ-3.

In Table IV.1-9, it states the DPM daily threshold would not exceed the APCD threshold. However, the note in the impact statement on page IV.1-38 states, “the project would generate long-term operational air pollutant emissions that would exceed SLOAPCD daily emissions thresholds for ROG + NOx and DPM.” Please correct this statement, and any other statements in impact AQ-3, to be consistent with Table IV.1-9.

**2 Greenhouse Gas Emissions**

The Green House Gas section of the DEIR (starting on Page IV.1-20) describes the evaluation methodology and significance thresholds. This section notes that AB 32 based APCD significance thresholds and the City’s Climate Action Plan were based on achieving 2020 GHG reduction targets and are not an appropriate method of evaluating the project’s GHG emissions or Climate Action Plan consistency because the project would be completed in year 2024. The DEIR used a process similar to the one identified in the 2016 Association of Environmental Professionals Final White Paper Beyond 2020 and Newhall to derive a "locally-appropriate 2030 project-specific threshold" of significance for operational phase impacts of GHG emissions. Table IV.1-4 in the DEIR summarizes...
the derivation where non-applicable land uses relative to the project were extracted from the statewide data used in the derivation. It is not clear to the APCD whether the concerns identified in the Golden Door Properties case discussed on Pages IV.I-21 are fully addressed by the DEIR threshold derivation as the threshold was derived from statewide data. Ultimately the City, as the lead agency, may make project specific GHG threshold determinations.

**Impact GHG-1:** Project construction and operation would generate temporary and long-term increases in GHG emissions. These emissions would not result in a potentially significant contribution to climate change. This impact would be Class III, less than significant (DEIR, page IV.I-47).

The APCD has the same concerns with the calculations in Table IV.I-13 & 14 as Table IV.I-7 & 8 stated above in Impact AQ-2. In Appendix E, a “typical phase” is equal to about a ninth of the total construction needed for buildout of the project, excluding the “retail shopping center” emissions. A “typical phase” would generate about 694.13 MT CO2e. If this amount represents one of nine years, then it seems the construction GHG emissions should be nine times this amount added to the GHG emissions generated from construction of the “retail shopping center”. Please explain how the total amount of annual GHG construction emissions of 694.13 MT CO2e as shown in Table IV.I-13 represents a reasonable worst-case and if it does not, then please correct the table and provide documentation as to how the reasonable worst-case emissions were determined.

The APCD is concerned with the potential underestimation of the GHG construction emissions since Table IV.I-14 shows the “Emissions per Service Person” threshold for buildout of this project meets but does not exceed the DEIR developed 3.3 MT CO2e per service person per year threshold.

**Impact GHG-2:** The project would be inconsistent with the City's Climate Action Plan and SLOCOG's 2019 Regional Transportation Plan (RTP) without mitigation. This impact would be Class II, less than significant with mitigation incorporated (DEIR, page IV.I-49).

On page IV.I-50 the DEIR states under both the “Paso Robles Climate Action Plan” and “Regional Transportation Plan” sections that the buildout year is 2024. In other sections of the DEIR, such as on page IV.I-53, states the buildout year is 2030. Further, the CalEEMod “Buildout” calculations in Appendix E states the operation year as 2030. Please clarify whether the buildout of the project is scheduled for 2024 or 2030.

Additionally, on page IV.I-50, the DEIR analyzes if the project is consistent with SLOCOG’s 2019 RTP and Sustainable Communities Strategy (SCS). The APCD would like to echo the concerns of SLOCOG and state the DEIR makes an erroneous reference to SLOCOG's SB 375 targets for the region. The DEIR states that under SB 375, the California Air Resources Board (CARB) set passenger vehicle GHG reduction targets of an 8 percent decrease in per capita vehicle miles traveled (VMT) by 2020 and an 8 percent decrease in per capita VMT by 2035. SB 375 targets are in units of percent per capita reduction in GHG emissions relative to 2005, not VMT. This error is then used to reference VMT targets set by SLOCOG within the 2019 RTP and SCS, SLOCOG did not set VMT targets in the 2019 RTP and SCS. This error is also repeated in the Under Significance After Mitigation section (pg. IV 1-53) which states that SLOCOG’s 2019 RTP contains VMT targets for 2024 and 2035. Additionally, the document references the previous SB 375 reduction targets for the SLOCOG region. The 8 percent reduction for years 2020 and 2035 were the initial targets set by CARB. CARB updated the SB 375
GHG reduction targets in 2018 to a 3 percent reduction for year 2020 and an 11 percent reduction for year 2035. The 2019 RTP and SCS incorporates the updated targets for the region. Evaluation of consistency with SLOCOG’s 2019 RTP, SCS, and SB 375 targets should reflect the updated targets.

Along with analyzing if the project conflicts with the City of Paso Robles Climate Action Plan and SLOCOG’s 2019 RTP, the project should also analyze if it is consistent with CARB 2017 Scoping Plan. In the CARB 2017 Scoping Plan-Identified VMT Reductions and Relationship to State Climate Goals document, it states a project that can show 15 percent VMT reduction from regional or city VMT averages is consistent with the transportation assumptions in the CARB 2017 Scoping Plan and thus consistent with the state’s 2030 and 2050 GHG reduction targets. Projects that cannot demonstrate a 15 percent VMT reduction may need to implement design changes or offsetting mitigation to reduce transportation impacts. The Governor’s Office of Planning and Research Technical Advisory on Evaluating Transportation Impacts in CEQA suggests mitigation measures and alternatives to reduce VMT (page 26-28) in conjunction with their recommendations to determine significance of transportation impacts. The suggested VMT mitigation may support GHG reduction as well as Section 21099 of the Public Resource Code which states that the criteria for determining the significance of transportation impacts “shall promote the reduction of greenhouse gas emissions”.

Again, thank you for the opportunity to comment on this proposal. If you have any questions or comments, feel free to contact me at (805) 781-5912.

Sincerely,

JACKIE MANSOOR
Air Quality Specialist
JNM/jjh

cc: Sara Sanders, San Luis Obispo Council of Governments
    Jenna Schudson, California Department of Transportation

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COMMENTER: SLO County Air Pollution Control District 6

DATE: April 24, 2020

Air Quality Comments:

- AQ-1 Response: The mitigation measure AQ-1 was revised to align with SLO Rideshare program.

Incorporate a goal/policy into the Specific Plan to Develop an educational program with San Luis Obispo Regional Rideshare to provide occupants of non-residential uses with alternative transportation and smart commute information (e.g., transportation board, electronic kiosk, new hire packets, web portal, newsletters, social media, etc.).

Working with SLO Regional Rideshare, incorporate a goal/policy into the Specific Plan to implement programs that reduce both residential and non-residential VMT within the Beechwood Development. Incorporate a goal/policy into the Specific Plan to implement programs to reduce employee VMT at non-residential uses (e.g., incentives; SLO Regional Rideshare trip reduction program; bicycle share programs; shuttles/vanpools; on-site employee lockers, showers, housing; alternative employee schedules [e.g., 9/80s, 4/10s, telecommuting, satellite worksites, etc.]). (page IV. I-30)

- AQ-2 Response: The commenter was concerned with the construction emissions modeling and values in CalEEMod (Appendix Volume 1) and the reporting of typical phase emissions for the 9 construction phases. To clarify the construction model, Mitigation Measure AQ-2(a) g and h has been updated to include a final report of the actual construction emission fleet as part of the Construction Area Management Plan. Through this mitigation measure reporting of actual fleet to the APCD will occur to ensure the BATC is applied.

The commenter found information that did not correlate related to the import/export soil. The EIR has been updated to reflect 20,000 cubic yard of import soil. Thus the statement in DEIR has been removed. In addition, the project's dust emissions would not exceed the daily threshold or quarterly Tier 1 threshold primarily because no soil material transport would be required and because grading activities would not be intensive due to a relatively long grading phase as compared to the size of the disturbance area. (pg IV. I-32).

- AQ-3 Response: The commenter requested for the FEIR to represent all feasible measures for the project, and identify if other measures are feasible. Through consultation with the APCD during June 2020, measures have been identified in the FEIR. The measure for Visible Emissions Monitoring has been included as well as the requirement for Construction Areas Management Plan (CAMP) to include reporting of visible dust and the final designation of proposed construction fleet at the time of construction. Comment has been addressed, please see AQ-2. Furthermore, as part of the Construction Area management Plan (CAMP development identified below) at the time the proposed construction schedule is known, the actual daily construction fleet air pollutant emissions will be re-evaluated to account for the reasonable worst-case construction phase and the requirement for ongoing reporting of off-road construction vehicles; this will ensure the Best Available Control Technology is applied to the actual fleet throughout Construction. (pg IV. I-32).

Greenhouse Gas (GHG) Emissions Comments:

- The commenter summarized the findings of the GHG section of the DIER. The APCD noted that a “locally appropriate 2030 project-specific threshold” was derived consistent with current guidance from the Association of Environmental Professionals. However
the *Golden Door Properties Case* referenced a threshold derived from statewide data. The APCD agrees that the City would make a project specific GHG threshold determination as the lead agency. And no changes to the EIR are warranted.

-No changes are warranted to the EIR regarding the comment in reference to the *Golden Door Properties Case*. The *Golden Door Properties Case* applies a threshold derived from statewide data to evaluate GHG impacts. The Beechwood EIR applies a “locally appropriate 2030 project-specific threshold” derived consistent with current guidance from the Association of Environmental Professionals. The APCD noted in the comment letter that they are in accordance with this methodology.

- **Impact GHG-1** identified concerns with potentially underestimating the GHG construction emissions. The “Emission Per Service Person” threshold for buildout is the methodology that has been historically applied by the City and upholds the finding that the project construction and operations contribution to climate change is a Class III, less than significant impact.

- **Impact GHG-2** the buildout projections have been revised to clarify that the buildout year is 2030. Impact GHG-2 is below:

> The City’s Climate Action Plan is a long-range plan to reduce GHG emissions from City government operations and community activities within Paso Robles. The Climate Action Plan is a qualified GHG reduction plan consistent with State CEQA Guidelines Section 15183.5 through year 2030. However, the proposed Specific Plan has a buildout year between 2024 and 2030 for purposes of this EIR year 2030 is used. (pg.IV.I-50)

> Implementation of Mitigation Measures AQ-1 and AQ-3 would reduce GHG emission relative to 2005 daily VMT per capita and ensure that the project would be consistent with SLOCOG’s 2019 RTP VMT targets for 2020 2024 and 2030 2035. (pg.IV.I-53)

- The references to VMT as related to SB 375 reduction targets has been revised for consistency with the ACPCD recommendation. The document has been updated to indicate that the reduction of GHG emissions relative to 2005 is the SB375 target (not VMT). Revised section copied below:

> Under SB 375, the development and implementation of SCSs, which link transportation, land use, housing, and climate policy at the regional level, are designed to reduce per capita mobile source GHG emissions through implementation of measures that would result in reductions in per capita VMT. In 2018, CARB adopted more aggressive SB 375 targets as a means of supporting progress toward the 2017 Scoping Plan goals. For the SLOCOG region, CARB set passenger vehicle GHG reduction targets of an 3% decrease in per capita VMT by 2020 and an 11% decrease in per capita VMT by 2035. Therefore it is assumed a decrease in GHG emission will be relative in the future. This equates to a reduction from 22.7 daily VMT per capita in 2005 to 20.7 daily VMT per capita for 2035 (SLOCOG 2019). Assuming a linear reduction in daily VMT per capita, the target reduction for 2024 (the project’s buildout year) would equate to a daily rate of approximately 21.4 VMT per capita. (pg.IV.I-50)

- APCD recommended including mitigation measures and alternatives to reduce VMT that may support GHG reduction as well as PRC Section 21099 guidance to “promote the reduction of greenhouse gas emissions.” The FEIR includes an explanation of the consistency with CARB 2017 Scoping Plan, which identifies VMT and Reduction and Relationship to State Climate Goals. No changes to the GHG section of the EIR are warranted.
April 24, 2020

Darren Nash, City Planner
City of Paso Robles
1000 Spring Street
Paso Robles, CA 93446

COMMENTS FOR THE DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) FOR THE
BEECHWOOD SPECIFIC PLAN PROJECT

Dear Mr. Nash:

The California Department of Transportation (Caltrans) appreciates the opportunity to review the DEIR for the Beechwood Specific Plan Project. This project includes a Specific Plan, General Plan Amendment, Rezone, Development Plan, several tentative tract maps, oak tree removal permit, the construction of 911 residential units, up to 47,000 sf of mixed-use commercial, and 28.4 acres of parks, open space and conservation lands on a 234.83-acre site. Caltrans offers the following comments at this time:

General Comments:

Caltrans supports local planning efforts that are consistent with State planning priorities intended to promote equity, strengthen the economy, protect the environment, and promote public health and safety. We accomplish this by working with local jurisdictions to achieve a shared vision of how the transportation system should and can accommodate inter-regional and local travel.

Projects that support smart growth principles which include improvements to pedestrian, bicycle, and transit infrastructure (or other key Transportation Demand Strategies) are supported by Caltrans and are consistent with our mission, vision, and goals.

As the City approves development projects, some of considerable size such as Olsen-Chandler Ranch (1200+ homes), and major infrastructure projects (State

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California’s economy and quality of life."

BEECHWOOD SPECIFIC PLAN FINAL EIR

69
Mr. Darren Nash  
April 24, 2020  
Page 2

Route (SR) 46 East/Union Road interchange, US101/ SR46 West roundabout improvements, Vine Street realignment) in the area, it is imperative that we continue to work together to help ensure a thriving community by appropriately analyzing impacts and working to reduce vehicle miles traveled (VMT) & greenhouse gas (GHG) emissions. For these and other projects, Caltrans is committed to working with the City to focus on plan consistency and mitigation for both project specific and cumulative impacts.

Specific Comments:

Caltrans concurs with the recommendation that the project make a fair share contribution through the City’s impact fee program for ultimate improvements on SR 46 East. That being said, there are additional details about the analysis and mitigations that we believe need further clarification.

The Beechwood Specific Plan DEIR does not specifically identify the project generated traffic impacts that will occur on U.S. Route 101/State Route 46 East and U.S. Route 101/State Route 46 West interchanges. While it is good that the project is contributing its fair share to the impact fee program, it is also important to identify and disclose the specific impacts at these two locations.

Not having this information could understate the need for potential traffic control and geometric improvements in the near term, resulting in unforeseen congestion, inconvenience, and additional expense to the City of Paso Robles.

Caltrans requests to be included in any future public noticing regarding this project to allow us to prepare for and participate in the public process.

We look forward to continued coordination with the City on this project. If you have any questions, or need further clarification on items discussed above, please contact me at (805) 549-3432 or Jenna.Schudson@dot.ca.gov.

Sincerely,

Jenna Schudson  
Development Review Coordinator  
District 5, LD-IGR South Branch

“Provide a safe, sustainable, integrated and efficient transportation system to enhance California’s economy and livability.”
COMMENTER: Jenna Schudson, Caltrans District 5

DATE: April 24, 2020

The commenter restates the project description and goals for working with the City of Paso Robles on development and infrastructure projects.

The commenter concurs with mitigation requiring fair share payment for improvements to SR 46 E. The commenter states concern that the EIR does not identify potential impacts to Highway 101/SR 46 East and Highway 101/SR 46 West.

The TIA analysis on which the Draft EIR is based includes all merge/diverge/weave segments at the U.S. 101/SR 46 East and U.S. 101/SR 46 West interchanges. The ramp terminal intersections were not included in the TIA analysis, as the project would add fewer than 40 peak hour trips to any of these intersections, which does not trigger the need for study based on the 2002 Caltrans TIS Guidelines. Caltrans did not request evaluation of these intersections in their review of the initial scope of work or MOA.

The commenter’s concurrence with the traffic-related Mitigation Measures will be forwarded to City decision-makers for review and consideration.

.
From: David Athey <DAthey@prcity.com>
Sent: Tuesday, April 7, 2020 1:29 PM
To: Brandi Cummings <Brandi.Cummings@swca.com>; Warren Frace <WFrace@prcity.com>; Darren Nash <DNash@prcity.com>
Subject: FW: 063 – BE. - SCH# 2018061064- Environmental Document Review - Due to Lead by 04/27/20

From: Coomer, Kevin@CHP <KCoomer@chp.ca.gov>
Sent: Tuesday, April 7, 2020 12:59 PM
To: state.clearinghouse@opr.ca.gov
Cc: CHP-701_AA_Desk <701_AA_Desk@chp.ca.gov>; Neumann, Tim@CHP <TNeumann@chp.ca.gov>; Enciso, Blanca@CHP <Blanca.Enciso@chp.ca.gov>; Klingenberg, Greg@CHP <GKlingenberg@chp.ca.gov>; David Athey <DAthey@prcity.com>
Subject: FW: 063 – BE. - SCH# 2018061064- Environmental Document Review - Due to Lead by 04/27/20

Good afternoon,

I have reviewed the attached environmental impact documentation and have corresponded with the City Engineer for the City of Paso Robles, Mr. David Athey. Although this project would definitely create an increase in traffic congestion in the area and local community, I have reviewed the complete Beechwood Draft Environmental Impact Report, and have determined the planned traffic engineering modification requirements contained in the project proposal would adequately mitigate these increased traffic concerns.

With that, I have determined there to be no impact to the Templeton Area's local operation and/or public safety by SCH 2018061064.
Please let me know if you have questions or concerns.

Thank you,
Kevin

Lieutenant Kevin Coomer, Commander
California Highway Patrol
Templeton Area
101 Duncan Road
Templeton, CA 93465
(805) 434-1822 – Office
(805) 835-1761 - Cell

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From: Enciso, Blanca@CHP
Sent: Wednesday, April 1, 2020 3:49 PM
To: Neumann, Tim@CHP <TNeumann@chp.ca.gov>
Cc: Coomer, Kevin@CHP <KCoomer@chp.ca.gov>; CHP-701_AA_Desk <701_AA_Desk@chp.ca.gov>; Klingenberg, Greg@CHP <GKlingenberg@chp.ca.gov>
Subject: 063 – 86 - - SCH# 2018061064-Environmental Document Review - Due to Lead by 04/27/20

Good afternoon,

Special Projects Section (SPS) recently received the referenced "Notice of Environmental Impact" document from the State Clearinghouse outlined in the following Website:

https://ceqanet.cpr.ca.gov/2018061064/2

Due to the project’s geographical proximity to the Stockton Area, please use the attached checklist to assess its potential impact to local Area/Section operations and public safety.

CC to Division FYI only

Please feel free to e-mail me if you have any questions.

Thank you!

Kind Regards,

Blanca Enciso
Special Projects Section-063
Transportation Planning Unit
California Highway Patrol
Office (916) 849-9365
Memorandum

Date: March 30, 2020
To: Templeton Area (740)
From: DEPARTMENT OF CALIFORNIA HIGHWAY PATROL
       Special Projects Section
Subject: ENVIRONMENTAL DOCUMENT REVIEW AND RESPONSE
         SCH# 2018061064

Special Projects Section (SPS) recently received the referenced “Notice of Completion”
environmental impact document from the State Clearinghouse (SCH).

Due to the project’s geographical proximity to the Templeton Area, please use the attached checklist
to assess its potential impact to local Area operations and public safety. If it is determined that
departmental input is advisable, your written comments referencing the above SCH number must be
email to state.clearinghouse@opr.ca.gov or mailed to the State Clearinghouse at 1400 Tenth
Street, Room 121, Sacramento, CA 95814. Your written comments must be received by SCH no
later than April 24, 2020. For reference, additional information can be found in General Order
41.2, Environmental Impact Documents.

For project tracking purposes, SPS must be notified of Templeton Area’s assessment of the project
(including negative reports). Please e-mail a copy of Area’s response to Associate Governmental
Program Analyst Blanca Enciso at blanca.enciso@chp.ca.gov. For questions or concerns, please
contact Ms. Enciso at (916) 843-3370.

R. A. HATFIELD, Lieutenant
Acting Commander

Attachments: Checklist
             Project File

cc: Coastal Division

Safety, Service, and Security
An Internationally Accredited Agency
COMMENTER: Kevin Coomer, Lieutenant Commander, California Highway Patrol

DATE: April 7, 2020

The commenter notes that the project would increase traffic in the area. The commenter notes that the planned traffic engineering modification requirements would adequately mitigate the increased traffic concerns. The commenter states that there will be no impact to the Templeton CHP operation or public safety.

The commenter’s remarks do not relate to environmental issues of the project and will be forwarded to City decision-makers for review and consideration.

No revisions to the EIR are warranted.
April 23, 2020

By Email: Planning@PRCity.com

City of Paso Robles City Hall
Attention: Planning
1000 Spring Street
Paso Robles, California 93446

Re: Comments to the Draft Environmental Impact Report for the Beechwood Specific Plan

To Whom It May Concern:

Our office represents the Paso Robles Joint Unified School District ("District"). Please accept this letter as the District’s comments to the Draft Environmental Impact Report ("Draft EIR") for the Beechwood Specific Plan ("Specific Plan" or "Project"). The Specific Plan includes up to 911 single family and multi-family residential units, an 8.1 acre public park, 10.1 acres of green open space, 10.2 acres of conserved open space, and 47,000 square feet of mixed-use commercial space, all to be located on a 234.83 acre site.

The Specific Plan does not include any space allocated for the construction of new public schools; however, Virginia Peterson Elementary School is located approximately 40 feet west of the Project at 2501 Beechwood Drive. Students residing within the Specific Plan would also be within the attendance boundaries of Daniel Lewis Middle School and Paso Robles High School.

A. Summary

As discussed in this letter, the District’s primary concern with the Draft EIR is that it does not accurately reflect the realities of school facilities funding, and in turn, fails to appropriately analyze and address some of the impacts that will result from development of the Specific Plan with regard to school facilities. A key point for consideration prior to finalizing the EIR should be that even when payment of Community Facilities District ("CFD") fees and State-mandated impact mitigation fees ("developer fees") are factored in the calculation, there will likely be insufficient funding for the school facilities and staffing needed to serve the additional students resulting from the Project.
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As an additional overall concern, there will be other impacts to students and staff resulting from the Specific Plan. These include, but are not limited to, traffic and transportation concerns, noise, hazardous materials, the need for adequate emergency evacuation routes, and other reasonably foreseeable impacts. The Draft EIR notes that these environmental conditions are likely to be “significant requiring mitigation” but deems the temporary short-term nature of these activities as having a “less than significant” impact on District schools. (Draft EIR, IV.M-12.) This analysis is short-sighted, especially in light of the proposed 10-year Project build out.

Further, the Draft EIR must consider the cumulative impact of the Beechwood Specific Plan together with the anticipated impacts of the Olsen-South Chandler Specific Plan, the North Chandler Specific Plan, and other forthcoming projects in the area, with regard to environmental concerns, including traffic, noise, and air quality.

As discussed in this letter, all of the potential impacts of the Project need to be further analyzed and addressed appropriately in the Draft EIR.

B. Areas of Concern

1. Potential Increases in Enrollment

The District understands that the Specific Plan includes up to 911 single family and multi-family residential units. As discussed below, such growth will generate approximately 560 additional students to be served by the District; however, the Draft EIR fails to consider the impacts of such growth on the District and the realities of school funding that would be needed to provide the facilities and staffing necessary to serve those students. (Draft EIR, IV.M-12.)

The District currently serves approximately 6,900 students and operates six elementary schools, two middle schools, one comprehensive high school, and one alternative high school. Based on the District’s projected enrollments for 2022, nine of its eleven schools are expected be at over ninety percent (90%) capacity, with six schools at or exceeding capacity.

The District’s student generation factors (“SGFs”) broken down by grade level, as set out in the District’s December 2018 Residential Development School Fee Justification Study, are as follows:

<table>
<thead>
<tr>
<th>School Level</th>
<th>Single Family Detached Units</th>
<th>Multi-family Attached Units</th>
</tr>
</thead>
<tbody>
<tr>
<td>Elementary School</td>
<td>0.1470</td>
<td>0.3226</td>
</tr>
<tr>
<td>Middle School</td>
<td>0.0819</td>
<td>0.1417</td>
</tr>
<tr>
<td>High School</td>
<td>0.1188</td>
<td>0.1549</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>0.3477</strong></td>
<td><strong>0.6192</strong></td>
</tr>
</tbody>
</table>

(Paso Robles Joint Unified School District Residential Development School Fee Justification Study, December, 2018, p. 11.)
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The Draft EIR calculates that using the District’s current student generation rate of 0.61 students per household, the Project “would contribute approximately 556 students to the District (911 dwelling units x 0.61 students/dwelling unit).” The Draft EIR notes that this figure is “generalized to aggregate all grade levels” to account for changes in the calculation over the 10-year phased Project build out. (Draft EIR, IV.M-12). As noted above, a majority of the District’s schools are expected to be at or over capacity by 2022. In 2018-2019, Virginia Peterson Elementary enrolled 453 students in grades K through 5. The school’s maximum capacity is 650 students—meaning that the District could experience a lack of space for all of the elementary students that would be generated by the Project. These capacity concerns should be more fully analyzed and addressed in the Draft EIR.

2. Insufficient School Funding

The Draft EIR acknowledges that development facilitated by the Specific Plan “would increase the demand for schools such that new facilities and staff would be required to provide additional student capacity.” (Draft EIR, Table II-2, Item PS-3.) However, the Draft EIR is incorrect in asserting that the payment of the City’s CFD Special Tax and developer fees would render the impact of the Project on public schools as “less than significant (Class III).” (Id.; IV.M-15.)

By way of background, developer fees are fees that may be levied or imposed in connection with or made conditions of any legislative or adjudicative act by a local agency involving planning, use, or development of real property. (Ed. Code § 17620.) “Level I” developer fees are levied against residential and commercial or industrial developments on a price per square foot basis. If a district is able to establish a sufficient “nexus” between the expected impacts of residential and commercial development and the district’s needs for facilities funding, then the district may charge up to $4.08 per sf of residential development, and up to $0.66 per sf of commercial development, which maximum amounts are increased every two years based on the statewide cost index for class B construction.1

The Draft EIR relies on the language of Senate Bill (“SB”) 50 which declares that the payment of the developer fees authorized by Education Code section 17620 constitutes “full and complete mitigation of the impacts of any legislative or adjudicative act on the provision of adequate school facilities.” (Gov. Code § 65995(h).) (Draft EIR, IV. L-14.) However, California courts have since acknowledged that developer fees do not constitute full and complete mitigation for school-related impacts other than school overcrowding. (Chawanseeke Unified Sch. Dist. v. City of Madera (2011) 196 Cal.App.4th 1016.)

From a practical standpoint, the amount of developer fees received by school districts typically falls far short of alleviating the impacts caused by development. The inadequacy of developer fees as a source of funding for school facilities has forced school districts to rely increasingly on other sources of funding, including local bond funds and State bond funds administered under

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1In January 2020, the State Allocation Board (SAB) increased the amount of “Level 1” developer fees that school districts are authorized to collect from $3.79 to $4.08 per square foot of residential development and from $0.61 to $0.66 per square foot of commercial development.
the State Facilities Program ("SFP"). However, these sources of funds are increasingly unreliable. The last State school facilities bond fund (Proposition 51) has been exhausted, and given the failure of Proposition 13—a new statewide facilities bond placed on the March 3 ballot—the District cannot reasonably expect to rely on State money to fund necessary school facilities. While the District will pursue State facilities funding in the event it becomes available, the amount of such funding in the foreseeable future is uncertain. Moreover, results of the March 3, 2020 election show that numerous local bond measures also failed to pass, which may signal a shift in voters’ willingness to take on additional tax burdens, even in support of education.

In the case of the Specific Plan, reliance on CFD and developer fees to fund school facilities is unrealistic, as those fees will likely cover only a portion of the costs for facilities, staff, and services required in order to serve students generated by the Project. The District is currently updating enrollment projections and is evaluating attendance boundaries to determine its future staffing needs, particularly in light of the significant numbers of students that are projected to result from development of this Project and the Olsen-South Chandler Specific Plan. The District’s conservative estimate of the costs to acquire property and construct a single new elementary school in 2018 dollars is $27,741,141. This estimate does not include interest costs associated with debt incurred to finance the construction of facilities. (Paso Robles Joint Unified School District Residential Development School Fee Justification Study, December, 2018, p. 14.)

The Draft EIR notes that the District will likely require construction of a new public school within 5 to 8 years. While that school may be located within the Olsen-South Chandler Specific Plan area, the District will still need to serve all of the students generated by that project as well as the Beechwood Specific Plan. (Draft EIR, IV.M-12.) Even assuming the District could adequately serve the influx of students resulting from this Project at its existing school sites, the developer fees and CFD fees generated by the Project would likely be insufficient to cover the cost of new relocatable classroom and restroom buildings and the expansion of other facilities, such as playing fields and parking spaces, necessary to serve the increased student population at those school sites. The CFD and developer fees from the Project would also not cover the costs associated with central administrative and support facilities, which are estimated to be $800 for each new student. (Paso Robles Joint Unified School District Residential Development School Fee Justification Study, December, 2018, p. 14.) Utilizing the Specific Plan’s estimate of 556 new students, these administrative costs and support facilities costs alone could mean an additional expense of $444,800. It must also be noted that developer and CFD fees would be collected incrementally during 10-year build out of the Project. Thus, the District will not have access to a “lump sum” amount of developer or CFD fees to fund needed new facilities.

In sum, the Draft EIR should be revised to appropriately consider the financial impacts and of the Project on public schools and to include mitigation measures that will render such impacts as Significant Impact that Can be Mitigated or Avoided (Class II) (Draft EIR, IV. I-7.).
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3. Noise Generated by Potential Construction

The Draft EIR states: “The Project would result in temporary noise in the BSP planning area vicinity during the construction phase. Construction would be permitted between the hours of 7:00 am and 7:00 pm and “noise levels could potentially exceed 80 dBA Leq, which would result in potentially significant temporary noise impact.” (Draft EIR, Table II-2, Impact N-3.) The Draft EIR classifies this impact as “significant but mitigable (Class II.) (Id.) The developers acknowledge that construction noise occurring within 400 feet of Virginia Peterson Elementary School “may interfere with instructional activities at the school.” (Id.; IV.H.17-H-19.)

The only mitigation measure included in the Draft EIR that would specifically address construction noise on school instruction would be two weeks prior written notice to the elementary school when construction activities are anticipated to occur within 400 feet of the school. (Table II-2, Mitigation (Measure(s) N-3(e)).) Beyond this, the Draft EIR does not analyze how the impact of construction noise—which could take place over a 10-year build out period—would be effectively mitigated to ensure that student instructional time is not disrupted. The Draft EIR also fails to address the effect of construction noise on instructional activities at Daniel Lewis Middle School or Paso Robles High School.

4. Transportation/Traffic/Parking

a. School Parking; Drop-Off and Pick-Up Zones

The Draft EIR notes that parking at Virginia Peterson Elementary School was identified as an “issue of concern” during Project initiation meetings. (Draft EIR, III-5.) Currently, there is on-site parking at the elementary school site for buses, visitors, and staff, while parents use a designated parking area and also park along Meadowlark Road and Beechwood Drive. (Draft EIR, IV.G-6.) The developers state they will construct back-in angled parking on the east side of Beechwood Drive adjacent to the school, but do not address the potential need for new parking on-site as a result of additional school staff needed to serve new students. (Draft EIR, IV.G-81.)

The current drop-off and pick-up spot for the elementary school is located on Meadowlark Road between Falcon Drive and Beechwood Drive. (Draft EIR, IV.G-81.) The Draft EIR notes that no traffic congestion or queuing was observed during “a typical morning drop-off and pick-up” and asserts that “[n]o modification to this drop-off area is needed and the project will not result in impacts to this drop-off area.” (Id.) It is unclear how the Project developers reached this conclusion, as it appears to be based on current, rather than projected school enrollment. The Draft EIR should analyze and address the potential impact on traffic congestion and drop-off and pick-up zones at the school sites resulting from new families and students residing in the Specific Plan area. The District also requires additional information from the developer regarding the impact that will result from unavoidable traffic congestion during school drop-off and pick-up times during the school day.
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As discussed above in Section B.1, CFD and developer fees are likely to be inadequate with regard to the construction or expansion of school facilities—including additional parking spaces and expanded drop-off and pick-up points—needed to serve the nearly 600 students that will be added to the District’s rolls as a result of the Project.

b. Emergency Access & Evacuation Routes

As discussed in the Draft EIR, the City of Paso Robles General Plan includes transportation planning policies applicable to all projects. Among other things, Policy CE-1A requires projects to “provide adequate access for emergency vehicles and evacuation.” (Draft EIR, IV.G-17.) The Draft EIR does not address the adequacy of emergency access and evacuation routes for the proposed school site(s). Instead, it asserts that a proposed Traffic Control Plan “would address construction-related emergency access and detour routes for vehicles, bicyclists, and pedestrians.” (Draft EIR, IV.G-30.) Without additional information regarding the impact of the Project on emergency access to and from its school sites, the District cannot be assured that emergency vehicles can quickly respond and that its schools can be safely and quickly evacuated in the event of an emergency.

c. Bicycle & Pedestrian Safety; Traffic Improvements at Virginia Peterson Elementary School

As shown in Table IV.G-9, the Project is expected to generate 10484 net new trips per weekday, including 753 AM peak-hour trips and 959 PM peak-hour trips. (Draft EIR, IV.G-23.) No information is provided as to how many trips to and from District schools are reflected in these calculations. There are currently no posted speed limits along Beechwood Drive and the road does not qualify as a 25 mph roadway pursuant to the California Vehicle Code. (Id.) The Draft EIR provides for Class I and II bikeways along Beechwood Drive and Meadowlark Road, and further proposes to restrip a portion of Meadowlark Road with 5-foot wide bike paths. (Draft EIR, IV.G-81, G-82.) This raises concerns as to the safety of bicyclists given the need to have safe turning lanes for ingress and egress to the school. The Draft EIR proposes a two-way stop-controlled intersection connection with the school driveway, but this plan does not appear to provide for turning lanes. (Id.)

New crosswalk striping at uncontrolled crossings and a flashing beacon/crosswalk at the school driveway are important pedestrian safety features; however, the Draft EIR does not adequately address the speed limit and increased traffic concerns for students walking to school along Beechwood Drive and crossing that street at other locations. Thus the Draft EIR does not meet the requirements of the City’s General Plan Policy CE-1A which also requires the developer to “[e]stablish safe pedestrian and bicycle paths for children and their parents to schools and other major destinations . . . .” Again, the District requires additional information before it can be assured that bicycles and pedestrians will be able to safely utilize the designated bikeways and crosswalks.
5. Hazardous Emissions

The Draft EIR notes that Virginia Peterson Elementary is located 40 feet west of the Project site, but states that “compliance with existing federal, state, and local regulations would ensure that hazardous materials impacts to schools would remain less than significant (Class III).” (Draft EIR, IV.J-14.) This broad assertion is not supported by any further data or information in the Draft EIR. Without specific information as to the specific hazardous materials that may be utilized in proximity to the school site(s) or transported along Meadowlark Road or Beechwood Drive, a determination that regulatory compliance will ensure that such impacts “remain less than significant (Class III)” is premature.

C. City Must Consider Cumulative Traffic and Related Impacts

Environmental impact reports must discuss cumulative impacts of a project when the project’s effects on the environment, viewed in conjunction with impacts of other past, present, or reasonably foreseeable future projects, is cumulatively considerable. (14 CCR 15130(a).) (See *San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 CA4th 713, 720, finding that piecemeal approval of several projects with related impacts could lead to severe environmental harm.) While a lead agency may incorporate information from previously prepared program EIRs into the agency’s analysis of a project’s cumulative impacts, the lead agency must address all cumulative impacts that were not previously addressed in the program EIR. (Pub. Res. Code § 21083.3(e); 14 Cal. Code Regs. § 14183(b)(3).)

The Project’s anticipated impacts on the District, as discussed in this letter, combined with the anticipated impacts of the Olsen-South Chandler Specific Plan (which would add up to 1,293 residential units), as well as the North Chandler Specific Plan and other forthcoming projects in the area, are cumulatively considerable with regard to environmental concerns, including traffic, noise, and air quality. Accordingly, the Draft EIR must consider the Beechwood Specific Plan in light of these cumulative impacts.

D. Conclusion and Requested Revisions and Amendments

In sum, the Draft EIR should be revised and amended to more accurately reflect the realities of school facilities funding and to more appropriately analyze and address some of the impacts that will result from development of the Specific Plan with regard to school facilities, including, but not limited to, traffic and transportation concerns, noise, hazardous materials, the need for adequate emergency evacuation routes, and other reasonably foreseeable impacts, which may result in the District being unable to serve the influx of students resulting from the Beechwood Specific Plan, the Olsen-South Chandler Specific Plan, and other significant development projects.

The District remains an active and cooperative partner and welcomes further discussions with the City of Paso Robles and the developers of the Specific Plan. We are hopeful for the opportunity to discuss our concerns and work together to ensure that quality school facilities can be provided.
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...and other concerns can be mitigated, for the families and staff residing and working within the Specific Plan area. Should you have any questions or would like to discuss these issues further, please feel free to contact the District office directly.

Sincerely,

LOZANO SMITH

Claudia Weaver

CW/cs

cc: Brad Pawlowski, Chief Business Official, Paso Robles Joint Unified School District (By Email: bpawlowski@pasoschools.org)
    Devon B. Lincoln, Attorney, Lozano Smith (By Email: dlincoln@lozanosmith.com)
COMMENTER: Devon B. Lincoln, Lozano Smith Attorneys at Law, and Claudia Weaver

DATE: April 23, 2020

The commenter submitted general and specific comments regarding increase enrollment, insufficient school funding, noise, traffic, emergency access, pedestrian safety, and hazardous emissions. The commenter restates the project description and state that they represent the Paso Robles Joint Unified School District.

All comments were addressed as summarized in response below; the numbering corresponds to the areas of concern raised in Section B of the letter.

A. Summary

The commenter states that the project EIR must consider cumulative impacts relative to traffic. The commenter states that the EIR must consider the Beechwood Specific Plan in addition to the Olsen-South Chandler Ranch and North Chandler Ranch projects for a cumulative impact discussion.

Cumulative impacts are discussed in the EIR under Section IV.G-6, Cumulative Impacts. The recently approved Olsen-South Chandler Ranch project, and the North Chandler Ranch project, which is considered in the City’s General Plan buildout, are included in the cumulative scenario. In addition, the Cumulative scenario includes enrollment growth projected at Virginia Peterson Elementary school in addition to other local schools. Cumulative forecasts were developed using the City’s Travel Demand Model, which estimates trips for all purposes, including school drop-off and pick-up.

B. Areas of Concern

1. Potential Increase in Enrollment

The commenter noted that the DEIR did not consider impact of growth and school funding. However, Impact PS-3 does indicate that a new school will be required within 5-8 years to meet projected City population increases. Although a new school is not a part of the project, the need for a new school is discussed in the Final EIR. This need for a new school does consider the cumulative impact of the known future projects within the City. Concerns regarding “the realities of school funding” are not considered to be an Environmental Impact, and will be forwarded to City decision-makers for review.

2. Insufficient School Funding

The commenter notes the CFD “Special Tax” and developer fees may not be sufficient to alleviate the impact caused by development. Comments that pertain to the potential financial or economic impacts of the project and do not reflect on the adequacy or content
of the Draft EIR will be forwarded to City decision-makers for review and consideration. The School District in conjunction with the City community Development Department and the CFD can enter into agreement for appropriate funds as needed to ensure school funding is sufficient.

3. Noise Generated by Potential Construction

In Section IV.H, Noise, the Draft EIR discloses that construction-related noise levels could reach approximately 65 dBA L\text{eq} at approximately 400 feet from the construction site. Actual noise levels would vary depending on the activities conducted and equipment used. The DEIR includes numerous mitigation measures that would reduce construction noise levels at the Virginia Peterson Elementary school, including requirements for the use of equipment mufflers/engine shrouds, limits on equipment idling when not in use, limits on the hours during which construction activities are allowed to occur, and locating equipment staging areas away from nearby sensitive receptors, such as the school. In addition, a public liaison must be appointed to specifically address any potential noise concerns that may occur during project construction. The public liaison would be responsible for implementing any addition noise-reduction measures to address individual concerns, such as the installation of temporary noise barriers. In addition, Virginia Peterson Elementary School would be notified in advance of start of construction. The notification would include the name and contact information of the designated public liaison to be contacted regarding construction-related concerns. As noted in the DEIR, the use of equipment mufflers/engine shrouds would reduce construction noise levels by approximately 10 dBA and the installation of temporary noise barriers, where required, would further reduce construction noise levels by an additional 5-10 dBA. [Clarify – does this reduce noise impacts to LTS?]

With regard to schools, a recommended interior noise standard of 45 dBA L\text{eq} is typically recommended to minimize potential for interference with interior classroom instructional activities. Assuming a minimum exterior-to-interior noise reduction of 20 dB for the existing school, exterior noise levels exceeding 65 dBA L\text{eq} could result in increases in interior noise levels exceeding the commonly recommended interior noise standard of 45 dBA L\text{eq}. In general and as noted in the DEIR, construction noise levels associated with development projects can reach levels of approximately 65 dBA at roughly 400 feet from the source center depending on the equipment used, activities being conducted and site conditions. As such, construction is not expected to result in significant interior noise levels

However, to address the comments noted above, a more detailed analysis of predicted construction noise levels at Virginia Peterson Elementary School has been conducted, refer to Appendix D Noise Impact Assessment. The analysis was conducted assuming that development were to occur within the quadrant located nearest Virginia Peterson Elementary School, adjacent to and east of Beechwood Drive. Off-road equipment identified for each of the major construction phases (e.g., site preparation, grading, building construction, paving, and architectural coating) were derived from the air quality analysis prepared for this project. In accordance with federal guidance for the evaluation of construction noise impacts, the analysis was conducted assuming that the two loudest pieces of equipment could be operating simultaneously over a one-hour period. Noise levels were predicted based on an average noise-attenuation rate of 6 dB
per doubling of distance from the source based on the estimated distance from the source center to the nearest classroom building façade. Typical exterior-to-interior noise reductions range from approximately 20-25 dBA. To be conservative, an exterior-to-interior noise reduction of 20 dBA was applied. Based on this analysis, predicted exterior average-hourly noise levels at the building façade of the nearest classroom during site preparation and grading activities would range from approximately 62 to 64 dBA Leq. During the building construction, paving, and architectural coating phases, predicted noise levels the nearest classroom building façade would range from approximately 58 to 63 dBA Leq. Assuming a minimum exterior-to-interior noise reduction of 20 dBA, predicted interior noise levels at the nearest classrooms would range from approximately 38 to 44 dBA Leq. Predicted interior noise levels at the nearest classroom at Virginia Peterson Elementary School would approach, but would not be anticipated to exceed, the commonly applied interior noise standard of 45 dBA Leq. However, as noted above, actual noise levels would vary depending on various factors including the equipment to be used and site conditions. Therefore, to be conservative, potential impacts to Virginia Peterson Elementary School were concluded to be potentially significant. As previously noted in the DEIR and restated above, implementation of the proposed mitigation measures, including the use of exhaust mufflers, engine shrouds, and idling limitations, would result in further reductions in predicted exterior and interior classroom noise levels of approximately 10 dB. Where determined necessary, the use of temporary noise barriers would result in additional reductions of 5-10 dBA. Noise levels associated with construction activities occurring within other areas of the project site, at further distance from the school, would be less than predicted. Daniel Lewis Middle School and Paso Robles High School are located in excess of a mile from the project site and would not be adversely impacted by construction noise occurring at the project site.

4. Transportation/Traffic/Parking

a. School Parking; Drop-Off and Pick-Up Zones

The commenter expresses concern that the project will impact students and staff relative to traffic and transportation. The commenter explains the existing parking situation for Virginia Peterson Elementary School. The commenter expresses concern that the project does not provide for additional on-site parking at the school and only proposes offsite angled parking on Beechwood Drive. The commenter expresses concern that analysis of the drop-off/pick-up spot for Virginia Peterson Elementary School was based on current school enrollment rather than projected enrollment. The commenter states that the EIR should analyze the potential congestion drop-off/pick-up with projected enrollment resulting from the project. The commenter requests additional information from the Developer regarding impacts during drop-off and pick-up hours.

The project’s potential transportation impacts, including impacts related to Virginia Peterson Elementary School, are discussed in Master Response 2. These include an evaluation of the school drop-off/pick-up area. The new off-site parking area will add approximately 30 parking spaces. Circulation issues related to the Virginia Peterson Elementary School were evaluated in detail in the Site Access and On-Site Circulation section of the Traffic Impact Analysis (EIR Appendix Volume II), with recommendations summarized in Table 17 of the Traffic Impact Analysis.
The EIR Cumulative scenario includes the City’s General Plan buildout, which includes enrollment growth projected at Virginia Peterson Elementary school in addition to other local schools. Cumulative forecasts were developed using the City’s Travel Demand Model, which estimates trips for all purposes, including school drop-off and pick-up.

The commenter states that development impact fees and CFD fees would likely be inadequate to construct additional parking spaces and an expanded drop-off and pick-up zone.

The fees required for the project under the City’s TIF program include the costs anticipated to improve roadways and transportation facilities, including additional parking along Beechwood Drive, to meet the expected traffic demand created by the project.

b. Emergency Access & Evacuation Routes

The commenter states that the DEIR does not address the adequacy of emergency access and evacuation for the proposed school site(s) and that the PRJUSD cannot be assured that emergency vehicles can quickly respond and that the schools can be quickly evacuated.

The project does not propose additional school site(s). Regarding the concern for emergency access, described in Section IV.J, Hazards, during construction, road closures and realignment of the roads may result in increased congestion in the event of an emergency. However, due to the proximity of alternate routes within the vicinity of the project site, construction-related impacts would be less than significant. The project would not have a significant effect on emergency response or evacuation. In addition, the project would be required to comply with Paso Robles Fire Department specifications and the California Fire Code, which would ensure that the project does not interfere with emergency response or evacuation procedures.

c. Bicycle & Pedestrian Safety; Traffic Improvements at Virginia Peterson Elementary School

The commenter states that Table IV.G-9 does not identify how many trips generated by the project are to/from Virginia Peterson Elementary School. Analysis assumed one percent of traffic was destined to/from Virginia Peterson. Additional traffic was assumed to drop off on the way to a final destination.

Figure 5 of the Traffic Impact Analysis (EIR Appendix Volume II) identifies the project’s trip distribution throughout the City. While the Traffic Impact Analysis does not identify a specific number of trips to Virginia Peterson Elementary School, approximately 20% of the project’s trips would be distributed to areas east of Creston Road, including to Virginia Peterson Elementary School. Figure 6b and 7b of the Traffic Impact Analysis show the project’s traffic volumes at nearby intersections. Additionally, due to the proximity of the project to the school, and the pedestrian and bicycle facilities that would be constructed as part of the project, it is expected that many of the students attending Virginia Peterson Elementary School from the project area would walk or bike to and from school.
The commenter states that Beechwood Drive does not have a posted speed limit and that the road does not qualify for a 25 MPH limit.

The commenter is correct that Beechwood Drive does not qualify for a prima facie 25 MPH residential speed limit due to the limited number of driveways. School zone speed limits typically extend 500 feet from school property unless they are extended by ordinance up to 1,000 feet from school property. The roadways surrounding the school qualify as school zone subject to school zone speed limits. The current speed limit is 25 MPH when children are present at the school. Mitigation Measure TR-23 would require the Applicant to update existing speed limit and crossing signage near the school.

The commenter expresses concern that the new bikeways along Beechwood Drive and Meadowlark Road do not provide safe ingress and egress to the school. The commenter states that the EIR does not meet General Plan Policy CE-1A because the EIR does not address the speed limit along Beechwood Drive or concerns with students walking to school and crossing the street. The commenter requests more information to assess the safety of bicyclists and pedestrians.

The project’s potential transportation impacts, including impacts Virginia Peterson Elementary School, are discussed in Master Response 2. These include an evaluation of school access for bicycles and pedestrians. The roadways surrounding the school qualify as school zone subject to school zone speed limits. Mitigation Measure TR-23 would require the Applicant to update existing speed limit and crossing signage near the school, install a rectangular rapid flashing beacon, install ladder crosswalk striping at uncontrolled crossings, and make the stop-controlled crossing consistent. There are currently no marked bikeways adjacent to the school. Class II bike lanes are proposed on Meadowlark Road and Beechwood Drive, and a Class I bikeway will connect to the stop-controlled crossing at Meadowlark Road and a flashing beacon north of Ridge Road.

5. Hazardous Emissions

Regarding the concern for potentially hazardous materials impact Page IV.J-6 indicated that the US Department Of Transportation regulated hazardous materials in all interstate roads and ensures proper training to handlers of hazardous waste, including driver training. Furthermore page IV.J-7 describes the role of California Department of Toxic Substances Control (DTSC), which is the agency regulating hazardous waste in California. Because the proposed project is a residential project, the use of hazardous materials would not be anticipated beyond the short term-construction period. As noted in MM HAZ-1 safe handling of hazardous materials would reduce the potential for accidental release of hazardous materials. No operational impacts from hazardous materials to schools would occur because the project does not include industrial uses or uses that would result in a release of hazardous material, and the commercial mix-use component in the specific plan area is approximately 0.45 miles southeast from the elementary school.
C. Draft EIR Pages with Text Additions and Deletions

The following pages show the additions and deletions to the Draft IR based on comments received and additional information to reduce and avoid impacts.
Plan is to establish a master planned neighborhood that features parks, multi-use pathways, and a variety of housing types and that celebrates the City’s heritage through preserving and replanting oak trees native to El Paso de Robles (Pass of the Oaks)." The Project has been designed to meet the needs of City’s growing population by providing a mix of residential densities, diverse residential product types, and smaller scale commercial uses with an emphasis on open space trails, on- and off- street bicycle paths, and both active and passive recreation including development of an eight-acre community park.

The Project Objectives should align with and support the City’s General Plan goals and policies. The Project Objectives of the BSP are listed below, together with how they relate to the pertinent General Plan goals and policies.

**Objective 1: Help meet regional and local workforce housing needs by providing a mix of land uses and housing types for a range of income levels**

This Guiding Principle includes the following components:

- High quality housing at diverse price points
- Small and large lot single family residences
- Attached for rent and ownership units
- Clustering density in areas with limited constraints

The Project Applicants are proposing a greater number of dwelling units and more diversity in the type of dwelling units than contemplated in the existing General Plan. Therefore, concurrent with the Beechwood Specific Plan, a General Plan Amendment is proposed that would increase the overall number of dwelling units permitted within in the Specific Plan Area from 674 to 911.

A range of lot sizes are proposed that would provide a variety of housing options to accommodate a mix of housing needs and income levels. In addition, the project would provide a variety of multi-family attached units, at different densities and include both for-rent and ownership attached units.

Objective 1 relates to the following General Plan Land Use and Housing Goals, Policies, and Action Items:

- **Policy LU-1A Land Use Categories.** Provide an appropriate mix and diversity of land uses.

- **Policy H-1.1.** Provide an adequate number of housing sites to accommodate the City's share of regional housing needs and its special housing needs.

- **Policy H-1.2.** Promote and expand housing opportunities for all segments of the community, recognizing such factors as income, age, family size, and physical ability. Integrate such housing opportunities in each neighborhood or planning area so as to avoid concentrations of any type of housing in limited areas of the City.

- **Policy H-6.1.** Develop and redevelop neighborhoods and planning areas using compact urban forms that foster connectivity.
The proposed site design clusters higher density development in less sensitive areas while requiring custom lot grading and stepped foundations where necessary in sensitive areas to lessen grading on slopes over 10% and to avoid removing oak trees.

In areas where larger numbers of good or average quality native oak trees exist or where slope gradient exceeds 10%, the project proposes custom graded lots and lots with stepped footings to minimize impacts to trees and reduce landform alteration. These design measures reduce the numbers of good and average quality oak trees to be removed, with the majority of trees proposed to be removed being of poor quality. All impacts to trees and other biological resources will be mitigated in accordance with City guidelines through avoidance where feasible, habitat preservation and enhancement, and impact mitigation.

The Project proposes 18.2 acres of accessible parks and open space, along with 10.2 acres of conserved open space. Additional acreage is devoted to shallow-bottomed water quality basins which will be planted with native vegetation and bio-retention plantings and media.

The Project includes a trail and sidewalk network which connects neighborhoods with the Project’s natural features, open space areas, and community and pocket parks.

Objective #4 relates to the following General Plan Land Use and Conservation Goals and Policies:

- **Policy LU-2K Support Environmental Responsibility.** Manage the natural landscape to preserve the natural beauty and rural identity of the community, which enhances ecological functions and maintains environmental and public health.

- **Policy C-3A Oak Trees.** Preserve existing oak trees and oak woodlands. Promote the planting of new oak trees.

- **Policy PR-1A Park and Recreation Facilities.** Strive to achieve 7-acres per 1,000 population parkland standards.

- **Policy C-3B Sensitive Habitat.** Incorporate habitats into project design, as feasible, including: oak woodlands, native grasslands, wetlands, and riparian areas. As part of the environmental review of new development projects: Biological studies/surveys will be prepared when appropriate to assess habitat value, alternatives to habitat removal will be explored, and input will be sought from other public agencies with expertise in biological resources.
### Table 0-1. Development Intent by Land Use / Zoning District

<table>
<thead>
<tr>
<th>Land Use</th>
<th>Development Intent/Permitted Uses (Primary Uses)</th>
</tr>
</thead>
<tbody>
<tr>
<td>RSF</td>
<td>Provides for single-family dwellings of variable lot sizes ranging from a minimum lot size of 2,720 s.f., including custom graded pads and sloping lots that will utilize stepped foundations to avoid impacts to Oak trees and reduce graded slopes. Also allows for cottage courts and duplex units.</td>
</tr>
<tr>
<td>RMF 24 Du/Ac</td>
<td>Provides for high density multi-family development including condominiums and rental apartments up to 24 dwelling units per acre. Includes recreational centers and other usable private open spaces.</td>
</tr>
<tr>
<td>RMF 14 Du/Ac</td>
<td>Provides for medium density multi-family development of cottage courts, duplexes, triplexes, and townhomes including condominiums and rental units. Includes recreational centers and other usable private open spaces.</td>
</tr>
<tr>
<td>Commercial – Mixed Use</td>
<td>Provide a variety of commercial, retail and office professional uses including neighborhood serving commercial uses and boutique specialty commercial uses with tourist and light agriculture orientation, such as wine tasting and arts and crafts studios. Allows live-work units with a conditional use permit and dwelling units may not exceed that maximum number of units allowed for the Project.</td>
</tr>
<tr>
<td>Open Space – Conservation</td>
<td>Permanently set-aside oak woodlands, flood plains, storm drainage ways, steep slopes, aesthetic and visual open spaces and similar environmentally sensitive habitat areas. Trails, road and utility corridor extensions.</td>
</tr>
<tr>
<td>Community Park</td>
<td>Provides for a public park offering active recreation and sports activities. Multi-purpose athletic field, playgrounds, and passive recreation.</td>
</tr>
</tbody>
</table>

For the purposes of final zoning, lot development criteria would be developed as part of the Final Beechwood Specific Plan in the design guidelines and / or implementation section which would rely substantially on the base zones for allowable uses and then add design flexibility with building type, setbacks, heights, etc.

### Residential Development

The development objective for the neighborhoods is to create a mix of attached single-family homes and multi-family (up to 24 DU/Ac) buildings (townhomes, triplex, four-plex styles) along the perimeter of the single-family lot subdivisions. This is sometimes referred to as blended density design, but overall the project will be characterized by a mix of single family residential, medium density residential, and high-density residential zoning. However, the densities will vary throughout the project in order to offer new homes that appeal to a broad range of potential buyers with differing incomes. There is no subsidized housing component being proposed.

### Commercial Development

The General Plan Land Use Element indicates that neighborhood commercial should be permitted within the Beechwood Specific Plan Area. The Project includes approximately 5.6 acres of commercial land use along Creston Road, allowing a floor-area ratio of 0.2, which amounts to approximately 47,000 s.f. of commercial floor area. This use is primarily intended as mixed commercial use providing neighborhood serving uses such as convenience shopping needs, neighborhood-scale markets, banks, restaurants, and personal services, but also allowing for a broader variety of commercial uses to serve a larger area such as specialty retail, professional office, and less intensive tourist-related commercial such as wine tasting and arts and crafts studios. Uses within this zone are generally consistent with those of the CP district as identified in...
Creston Road, which runs along the southern boundary of the site, is an arterial that connects the city with the rural county areas to the east. The project will be conditioned to improve this major road in accordance with the findings of the traffic report and proposed mitigations from the EIR. Improvements along the north side of Creston Road would include additional right-of-way and pavement width to provide for adequate travel and turn lanes, a bike lane, and curb and gutter. Final design criteria and mitigations would be determined by the EIR.

The existing Creston Road right-of-way and improvements are located within the unincorporated County. As such, the final design of Creston Road shall be coordinated with and approved by the County and an encroachment permit obtained for all work within the County’s jurisdiction.

Beechwood Drive, which bounds the site along its western boundary, would be widened from Creston Road to Meadowlark Road along the project frontage, providing on-street parking and other improvements near the intersection with Meadowlark Road.

Meadowlark Road is a collector road located on the northern boundary of the site. The project would include speed reduction measures, and traffic calming, to reduce existing high vehicle speeds. Traffic calming may include traffic circles/mini-roundabouts, curb extensions, chicanes, medians, striping, or other measures. Reduction in overall the roadway width will also create additional right of way area (behind the new curb line along the project frontage), and is intended to be used for water quality and detached multi-use pathway purposes.

Airport Road is a collector road located perpendicular to and north of Meadowlark Road that intersects the Project area. Airport Road associated with the project, and would be extended through the site from Meadowlark Road to Creston Road. This new section of Airport Road will be designed to provide left-turn lanes into the new residential subdivisions and will also include bicycle lanes to ensure safe passage for cyclists as well as a multi-use pathway on the west side intended to provide safe and efficient pedestrian travel. A sidewalk on the east side of Airport Road adjacent to the planned commercial use area will also be constructed, providing enhanced pedestrian access from the residential areas of the Project to the commercial corner at Creston Road and Airport Road.

Ridge Road extends within the interior of the Project site, along the east/west ridge of the project. This residential street will extend from Airport Road on the east, to Beechwood Drive on the west. This road will generally meander around existing oak trees and be lined with a meandering multi-use pathway along the northside and stormwater quality features. The new neighborhoods on either side of this collector will access Ridge Road at or in between one of two traffic circles where speeds will be reduced and safety increased.

The internal, neighborhood streets, will be 10’ width narrow in width as well. The goal is to limit the vehicle speed within the blocks of new homes, provide a more intimate streetscape, and limit the amount of runoff that is generated by impervious surfaces.

**Streetscape Character**
The streetscape character is schematically illustrated in Figures I-2 and I-6. The illustrations depict the relationships of street elements such as sidewalks, trails, bikeways, medians, street trees, shrubs, and ground covers. The streetscape character is a vital element to the overall land use plan and is...
intended to bind the various neighborhoods and uses together with common elements noted above. The streetscape character includes common elements for the various
LANDFORM MODIFICATION/ SITE GRADING CONCEPT

The site’s rolling topography will require the project to be integrated into the natural landform. While the grading scheme and storm water management strategies will be based on working with the existing slopes, where cuts and do fills occur, the earth form is proposed to be contour-graded so that the slopes will appear rounded and natural in character. This technique of grading the slopes will give the site a softened and more natural appearance and provide a better backdrop for the revegetation effort that will further enhance the graded areas. Grading of approximately 470,000 cubic yards (C.Y.s) of cut and fill is proposed for the project with up to 20,000 c.y. of import required for the project, pending final adjustment for soil shrinkage and bulking. Areas of deeper cuts up to 18 feet and fills up to 19 feet are required, although these areas are in a few isolated locations within the project site. Retaining walls are proposed in select areas ranging between three feet and 10 feet to reduce grading into sensitive resources.

Grading would accommodate building pads and foundations for the proposed project lots. The majority of the lots will be graded to provide building pads that will accommodate concrete slab foundations. The new lots will generally step up or down from one another from one to three feet along the street frontage. Design of street gradient would be intended to slow runoff will minimize erosion and provide more opportunity to incorporate water quality treatment in the street design. In addition, two areas within the Project are proposed for custom graded lots and stepped foundations to reduce impacts to Oak trees and to further reduce the amount of grading and graded slope heights. Map IV-2 in Visual Resources section IV-F shows a graphic of proposed cut and fill on the site. Figures I-6 and I-7 show landform cross section of the proposed earthwork.

DRAINAGE AND STORMWATER QUALITY MANAGEMENT

The authority to oversee implementation of clean water policies, as established through the Federal Clean Water Act, has been delegated to the States, and administration of the program at the local level rests with the City of Paso Robles with oversight provided by the Regional Water Quality Control Board. Because of its importance from an environmental quality perspective, stormwater runoff conveyance, treatment and storage significantly influences the subdivision design process. The Beechwood Specific Plan will provide a stormwater design that will integrate Low Impact Development features with stormwater collection, treatment, and detention in order to protect the beneficial uses of downstream waterways. One specialized component of this integrated stormwater design will be application of measures implemented to protect and enhance the existing and new wetland features within the project. The Project will design all of the stormwater facilities in compliance with City and regulatory agency requirements. The benefit to the project from these facilities, aside from treating polluted stormwater, will be the added managed open space in the neighborhoods.

A wetland mitigation program is being proposed to expand the existing wetland along Creston Road at the intersection with Beechwood Drive. This low lying area has the ready-made qualities for expansion of wetland vegetation and for replacement of some of the existing wetlands that will be impacted during construction. While there are existing wetland areas along Meadowlark Road that will be expanded and enhanced, the Creston Road wetland enhancement will increase its size and function. The existing wetlands along Meadowlark Road will be expanded and enhanced. The additional wetland area will be created near the center of the site to mitigate for the re-alignment of approximately 1,000 feet of an existing drainage feature and associated
Public Utility Infrastructure

The required infrastructure to accommodate the long-term land development within the Specific Plan area are presented on various maps throughout this Project Description, and as indicated below. These plans were prepared in order to determine the general costs of development and the fiscal impacts to the City related to long-term maintenance.

Improvements associated with buildout of the Specific Plan area that are needed to address public services to the project include:

- Extension of wastewater collection lines and construction of a sewer lift station and force main to serve all or portions of Subareas I-2, I-3, J-1 and J-4.
- Extension of City water main lines and construction of a water pressure booster station to serve portions of Subareas I and J.
- Accommodation for future recycled water
- Installation of dry utilities (i.e., gas, electric, cable TV, telephone, fiber optic) throughout the Project area.
- Widening, extension and/or improvement of public roads including road segments and intersection(s) discussed under Circulation.
- Installation of storm water collection and conveyance systems throughout the Specific Plan area.

The required infrastructure improvements for water, proposed water conservation measures sewer, communication, electric power, and gas are described below. Refer to the discussion above under Circulation Plan and Street Sections for the proposed extension and improvements to the public road network.

Water Facilities

Domestic water supply for the project from City supplies including the Nacimiento Water Project. This water was secured several years ago with the specific goal of providing a reliable source of water for the City’s future growth.

The majority of existing water delivery infrastructure in the streets adjacent to the property is sized to provide the necessary flows for domestic service and fire protection demands. On a portion of Beechwood Drive, a 12” main upgrade is proposed. The City of Paso Robles’ Capital Improvement Plan shows that a transmission main is to be extended through the Beechwood property, and City staff will determine the ultimate size of this needed infrastructure. As part of the project development process, new water mains and hydrants will be provided throughout the project as the various phases are developed. See Map I-8 Water Master Plan for the proposed domestic water facilities required of the Project.
I. Purpose of the EIR and Project Summary

Reso A - Exhibit C1

ARCHITECTURAL STYLES

- Duplicate image of craftsman house eliminated

map source: RICK Engineering Company, January 2020
II. Executive Summary

- of insignificance. Section 15091(a)(1) of the State CEQA Guidelines requires that findings be made indicating that changes or alterations have been required in the Project to avoid or substantially lessen Class II impacts.

- Class III impacts are adverse, but not significant impacts.

- Class IV impacts are beneficial impacts resulting from implementing the Project.

1. Significant and Unavoidable Impacts (Class I)

The Project could have significant, unavoidable impacts on air quality and greenhouses gases and traffic due to conversion of open space to residential use and loss of prime agricultural soils converted to other uses. The recommended mitigation measures reduce impacts to the greatest feasible extent, but a statement of overriding considerations will be required for these impacts for the City to certify the EIR.

Other impacts are less than significant or potentially significant but can be mitigated to less than significant levels by implementing the mitigation measures presented on Table II-2 at the end of this section, and discussed in the EIR.

If approved, the Proposed Project could go forward notwithstanding the impacts identified in this EIR because the Proposed Project is consistent with the General Plan of the City of Paso Robles and implements the Proposed Project objectives detailed in EIR section I-Project Description.

B. IRREVERSIBLE ENVIRONMENTAL CHANGES

Section 15126(f) of the State CEQA Guidelines states that for the preparation of EIRs, a discussion of any significant irreversible environmental changes which would be involved in the proposed action should be provided. For this project these irreversible environmental changes include: uses of non-renewable resources during the construction and operation phases of the Project, the commitment of future generations to the proposed uses, and any irreversible damage that would occur from development of the Project site.

In the short term, most changes that would occur on the site would be directly related to construction activities. These are significant and irreversible changes.

In the long term, the following effects would occur throughout the life of the project:

- Permanent increased traffic, air pollutant emissions and noise.

- Permanent loss of area available to native plant communities and agriculture.

- Permanent change in the visual character of the site.

- Permanent allocation of municipal water supplies and wastewater facility capacity.

- Permanent conversion of agricultural land to urban use.
incorporation by reference. In addition to materials cited, other environmental compliance documents have been used in this EIR. This list is not exhaustive and additional reference documents may be discussed in the appropriate environmental analysis sections of the EIR:

- Final EIR for the Paso Robles General Plan Update
- Olsen South Chandler Specific Plan EIR
Mitigation Measures

Mitigation Measures AG-2(a) and AG-2(b) are required to avoid or minimize potential conversion of farmland to non-agricultural use as a result of conflicts between new residential uses and adjacent agricultural operations. In addition, Mitigation Measure AQ-2 in Section IV-I, Air Quality, would require implementation of standard SLOAPCD dust control measures that would apply to construction in the Specific Plan area, which would incrementally reduce potential impacts to the productivity of neighboring agricultural uses.

AG-2(a) Agricultural Conflict Avoidance Measures

The following language shall be added to the Specific Plan:

Agricultural buffer easements, berms, and/or vegetative screening shall be implemented on newly recorded lots in the Specific Plan area adjacent to active agricultural uses outside of the Specific Plan area. Agricultural buffer easements, berms, and/or vegetative screening shall provide a minimum of 50 feet between active agricultural land uses outside of the Specific Plan area and new habitable structures in the Specific Plan area. The requirement will be a condition of approval of discretionary development applications, consistent with the requirements of Action Item 10 under Policy OS-1A and Action Item 4 under Policy LU-2E in the City’s General Plan and will include City-approved measures to reduce availability of public access to agricultural cultivation areas adjacent to the project site (e.g., fencing, signs, etc.). Future residents shall be notified of agricultural buffers as part of purchase or lease agreements.

Plan Requirements and Timing. The final Specific Plan shall include the required language prior to approval.

Monitoring. The City shall review and approve the specific requirements for agricultural conflict avoidance measures prior to development plan approval for the project and shall ensure that agricultural conflict avoidance measures are implemented in compliance with General Plan Policy OS-1A and Policy LU-2E.

AG-2(b) Agricultural Fencing

The project applicant shall coordinate with the City to fund installation of fencing and signs along the southern and eastern boundaries of the Beechwood property at locations where active agricultural operations are adjacent to the Specific Plan area to minimize potential for increases in trespass and vandalism of adjacent agricultural areas. Applicant shall coordinate as needed if fencing is on established PG&E easement or public rights of way.

Plan Requirements and Timing. The applicant shall clearly identify measures such as fencing, signage, etc. within the development plan and tract map. The style of proposed fencing shall be approved by community development and city prior to installation.
species, and shade for cattle. The mature blue oaks provide habitat for nesting and foraging birds and cavities that could support roosting bats. Oak titmouse (*Baeolophus inornatus*) and western bluebirds (*Sialia mexicana*) were observed feeding fledglings in two of the trees within the Plan Area. Lawrence’s goldfinch (*Spinus lawrencei*), lark sparrow (*Chondestes grammacus*), and Nuttall’s woodpecker (*Picoides nuttallii*) were also observed in the blue oaks and surrounding grassland and could potentially nest onsite. One active red-tailed hawk (*Buteo jamaicensis*) nest was observed within the blue oaks.

**Vineyard**

Approximately 38.8 acres of the Plan Area, located adjacent to Creston Road in the southeastern portion of the Plan Area, are comprised of a vineyard. Non-native annuals and weedy ruderal forbs are present between alternating vine rows and along the margins of the vineyard, including filaree, introduced annual grasses, annual burclover (*Medicago polymorpha*), and scarlet pimpernel (*Anagallis arvensis*). A few scattered mature blue oaks are also present in the southern portion of the vineyard, surrounded by vine rows.

**Cropland**

Cropland comprises approximately 9.8 acres of the western-central portion of the Plan Area. Crop fields in the Plan Area are plowed regularly and planted with dry-farmed grain crops. Much of the current annual grassland habitat had been used as cropland as recently as 2014. In previous years, some portion of the Plan Area was planted with dry-farmed grain or hay crops. Review of aerial photos dating to 1994 indicated the Plan Area has been regularly farmed since 2007. The majority of cover consisted of non-native annual grasses such as rye grass (*Festuca perennis*), foxtail barley (*Hordeum murinum*), and bromes (*Bromus diandrus, B. hordeaceus, B. madritensis rubens*), as well as some common herbaceous weeds such as black mustard (*Brassica nigra*), yellow star thistle (*Centaurea solstitialis*), and field mustard (*Hirschfeldia incana*). Red maids (*Calandrinia ciliata*), filaree (*Erodium botrys, E. cicutarium*), fiddleneck (*Amsinckia brachycarpus, A. lycopsoides*), popcorn flower (*Plagiobothrys canescens*), California poppy, and vetch (*Vicia villosa*) were present in low abundance but regular distribution. A small ephemeral drainage is located north of the existent cropland field. This drainage supports wetland vegetation, including common toad rush (*Juncus bufonius*), but lacked wetland hydrology and soil, typically flowing only during and immediately following rain events. When surface water is present in this drainage, it is transported west to the Beechwood Drive drainage.

**Wetland and Non-Wetland Waters**

Five federal wetlands comprising approximately 2.33 acres, and two non-wetland drainage features comprising 1,194 linear feet, are present within the Plan Area (refer to Table IV-C2 and Figure IV-C1). A formal wetland delineation was completed by Althouse and Meade, Inc. in November 2017 and approved by the U.S. Army Corps of Engineers (USACE) in January 2018 (Althouse and Meade 2018). The wetland alteration permit is in process with the ACOE at the time of FEIR. The locations of the delineated jurisdictional wetlands are identified on Figure IV-C1. The following narratives, excerpted from the Wetland Delineation Report (Althouse and Meade 2018) describe each wetland feature as it is labeled on Figure IV-C1.
dominance of *Festuca perennis* (FAC) and *Rumex crispus* (FAC) after the rains and therefore the jurisdiction was widened to the extent of the vegetation and changed to a wetland.

**Wetland 5**

Wetland 5 – Located south of Meadowlark Road, this wetland ponded water in 2015, but only had evidence of hydric soil through the redox depression indicator. Upland species dominated the feature and there was no sign of hydrology. In 2017, facultative species *Hordeum marinum* (FAC) and *Festuca perennis* (FAC) dominated Wetland 5 with a presence of oxidized rhizospheres.

This wetland feature is offsite and adjacent to the project site.

**Drainage A**

Drainage A exhibits a clear Ordinary High Water Mark (OHWM) upstream and offsite. It is a manipulated continuation of the flow path from a drainage on the PG&E easement to the east of the Study Area. The water enters the Study Area from the eastern boundary, flows across a farmed swale, and enters Wetland 2. For Drainage A, an offsite representative area exhibited an OHWM width of approximately 3 feet. Drainage A is a non-wetland waters of the U.S.

**Drainage B**

This drainage has a clear bed and bank and occurs along the southern right-of-way of Meadowlark Road. Water from the hills east of the Study Area drain onsite through the northeast corner and along the northern boundary and exit through a caged culvert approximately 990 feet west along Meadowlark Road. The width and depth of Drainage B is fairly consistent throughout the entire length. The average OHWM width in this drainage was approximately 18 inches (1.5 feet). Drainage B is a non-wetland waters of the U.S.

<table>
<thead>
<tr>
<th>Table IV.0-2. Wetlands and Waters of the U.S. and State</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Feature</strong></td>
</tr>
<tr>
<td>-----------------------------------------------</td>
</tr>
<tr>
<td>Wetland 1</td>
</tr>
<tr>
<td>Wetland 2</td>
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<tr>
<td>Wetland 3</td>
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<tr>
<td>Wetland 4</td>
</tr>
<tr>
<td>Wetland 5 (Offsite)</td>
</tr>
<tr>
<td>Drainage A</td>
</tr>
<tr>
<td>Drainage B</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
</tr>
</tbody>
</table>

*Source: Althouse and Meade, Inc. 2018.*
Swainson’s Hawk

Potentially suitable nesting and foraging habitat is present in the Plan Area for Swainson’s hawk. Swainson’s hawks were not observed during the 2018 wildlife surveys; however, implementation of the Specific Plan has the potential to impact this species if nesting occurs within the Plan Area at the time of construction. Direct impacts to this species may occur due to removal or trimming of trees, shrubs, and other nesting substrates that may contain active nests. Impacts could occur during initial ground-disturbing activities as well as site preparation (e.g., clearing, grubbing, and fuel management). Indirect impacts to this species may occur from construction activities in the vicinity of an active nest resulting in distress to adults and disruption of nesting behavior leading to abandonment or nest failure. Considering the amount of potential nesting habitat that would be impacted in proportion to the available habitat within the Plan area, impacts from the proposed project to the local population would be potentially significant. Therefore, impacts to Swainson’s hawk within the Plan Area through direct or indirect impacts would be potentially significant, if present. Mitigation has been included that would avoid and/or minimize potential impacts to this species, if present.

San Joaquin Kit Fox

Direct impacts to SJKF could occur through mortality or injury during initial ground-disturbing activities. Although no known or potential dens currently are documented onsite, the species is highly mobile and indirect impacts could occur if the project would remove known or potential dens that may be constructed by the time of project implementation by removing shelter or refugia for escape from predators. The project will also permanently impact likely up to be approximately 118 acres of annual grassland habitat suitable for SJKF. Impacts to SJKF are potentially significant.

Species of Special Concern

Amphibians (Western Spadefoot Toad)

The wetland areas located within the Plan Area are potential breeding areas for western spadefoot toad. Suitable upland habitat for this species occurs in the immediate vicinity of these wetland areas within the Plan Area. Direct impacts to western spadefoot toad include mortality or injury of individuals during initial ground-disturbing activities, as well as permanent or temporary impacts to potentially suitable breeding and upland habitat. Because this species tends to return to the same breeding area year after year and exhibits highly localized movement patterns mainly in the vicinity of suitable breeding habitat, populations are at a high risk of local extirpation from the loss of breeding habitat in combination with injury or mortality of individuals in uplands. Therefore, impacts to the western spadefoot toad from implementation of the Specific Plan are potentially significant.

Reptiles (Northern California Legless Lizard)

The blue oak savanna habitat within the Plan Area provides suitable habitat for northern California legless lizard within the leaf litter under trees. Though the Plan Area has a mixture of soil complexes, some portions are sandy loam, making for a more friable substrate for legless lizards to inhabit. Although legless lizards were not detected during biological surveys conducted within the
Plan Area, their burrowing habit makes detection very difficult. The proposed project could potentially impact northern California legless lizards during tree removal and other ground-
**BIO-1(c) Western Spadefoot Toad Impact Avoidance and Minimization**

If western spadefoot toads are found, the developer shall implement the mitigation measures the Owner/Applicant shall ensure the following actions are implemented to avoid and minimize potential impacts to western spadefoot toad:

a  For work conducted during the western spadefoot toad migration and breeding season (November 1 to May 31), a qualified biologist will survey the active work areas (including access roads) in mornings following measurable precipitation events. Construction may commence once the biologist has confirmed that no western spadefoot toad (any life stage) are in the work area.

b  If adult western spadefoot toad is found within the construction footprint, it will be allowed to move out of harm’s way of its own volition, or a qualified biologist will relocate the individual to the nearest burrow that is outside of the construction impact area. If toads are likely to be present during a particular activity and timeframe, specifically following measurable precipitation it is required prior to each beginning work each day, a qualified biologist will inspect underneath equipment and stored pipes greater than 1.2 inches (3 centimeters) in diameter for western spadefoot toad. If any are found, they will be allowed to move out of the construction area under their own accord, or a qualified biologist will relocate the individual to the nearest burrow that is outside of the construction impact area.

c  Trenches and holes will be covered and inspected by the construction contractor daily for stranded animals. Trenches and holes deeper than one foot deep will contain escape ramps (maximum slope of 2:1) to allow trapped animals to escape uncovered holes or trenches. Holes and trenches will be inspected by the construction contractor prior to filling.

**Plan Requirements and Timing.** Surveys are required between November 1 and May 31 following measurable precipitation events. Components a and b of this measure shall be implemented throughout project construction.

**Monitoring.** The City shall review and approve documentation of compliance with the conditions outlined in the measure.
Table IV.0-4. Wetlands and Waters Impacts and Mitigation Areas Available (WMA)

<table>
<thead>
<tr>
<th>Feature</th>
<th>Existing Ac/Linear Ft</th>
<th>Permanent Impacts</th>
<th>Temporary Impacts</th>
<th>Remaining Wetland</th>
<th>WMA Available</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Linear ft</td>
<td>Acres</td>
<td>Linear ft</td>
<td>Acres</td>
<td>Acres</td>
</tr>
<tr>
<td>Wetland 1</td>
<td>0.26</td>
<td>--</td>
<td>0</td>
<td>--</td>
<td>0.02</td>
</tr>
<tr>
<td>Wetland 2</td>
<td>0.04</td>
<td>--</td>
<td>0.005</td>
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<td>--</td>
<td>0.23</td>
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</tr>
<tr>
<td>Wetland 5</td>
<td>0.07</td>
<td>--</td>
<td>--</td>
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<td>--</td>
</tr>
<tr>
<td>Drainage A</td>
<td>201</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>--</td>
</tr>
<tr>
<td>Drainage B</td>
<td>993</td>
<td>350</td>
<td>0.01</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>TOTAL</td>
<td>2.332-2.26 acres wetland</td>
<td>1,194 linear ft non-wetland waters</td>
<td>350</td>
<td>0.29</td>
<td>0</td>
</tr>
</tbody>
</table>

Note:
1. This total is representative of 525 square feet (350 x 1.5).
2. This total varies slightly due to rounding.
Source: Althouse and Meade, Inc. 2018.

Direct impacts would include construction activities and placement of project components within the drainage features and indirect impacts could include erosion, sedimentation, and accidental release of hazardous construction materials during construction activities. Based on the proposed development plan, buildout of the Specific Plan is conservatively estimated to result in approximately 0.35 acre of temporary impacts and approximately 0.29 acre of permanent impacts to federally protected wetlands, and 350 linear feet (0.01 acre) of temporary impacts to federally protected non-wetland waters (Drainage B). Therefore, impacts to potentially jurisdictional drainage and wetland features resulting from buildout of the Specific Plan would be potentially significant.

Mitigation Measures

**BIO-2(a) Agency Coordination**

Impacts to drainages and wetlands as a result of the project are anticipated to require permits from USACE, USFWS, RWQCB, and CDFW. The Owner/Applicant shall
comply with all federal and state permitting requirements. The Owner/Applicant shall obtain and produce for the City correspondence from applicable federal and state
D. DRAINAGE, HYDROLOGY, AND WATER QUALITY

1. Environmental Issue

This section describes drainage, hydrology and water quality in Paso Robles and San Luis Obispo County. This section also evaluates the drainage, hydrology and water quality impacts associated with implementation of the Beechwood Specific Plan (BSP).

2. Scoping Issues for Drainage, Hydrology, and Water Quality

During the 30-day public review period for the Notice of Preparation, written and oral comments were received from agencies and the public. Issues raised related to hydrology and water quality included: project site drainage; insufficient water infrastructure; flood control and runoff on Meadowlark Road; potential to create new flood zones; and protection of nearby water bodies.

3. Environmental and Regulatory Setting

ENVIRONMENTAL SETTING

The following discussion below of the environmental setting regarding hydrology and water quality at the project site is based on the City of Paso Robles General Plan and Local Hazard Mitigation Plan.

The Salinas River watershed covers approximately 4,600 square miles and crosses two counties. The Salinas River flows northward from San Luis Obispo County, through the Salinas Valley into Monterey County, and, finally, into Monterey Bay. The river’s flow is seasonal, featuring dry summer and early autumn months. Peak flows occur during the October to April rainy season and are largely controlled by the Santa Margarita Lake and Dam, located approximately 20 miles upstream from the City. Several significant tributaries flow into the Salinas River in the vicinity of Paso Robles; these include the Nacimiento River, Estrella River, and Huerhuero Creek. In addition, several perennial creeks flow through parts of the City to converge with the Salinas River, including Dry Creek, Mountain Spring Creek, Turtle Creek, Peachy Canyon Creek, and Unnamed Creek No. 1 & No. 6.

The primary sources of pollution to surface and groundwater resources include stormwater runoff from paved areas, which can contain hydrocarbons, sediments, pesticides, herbicides, toxic metals, and coliform bacteria. Seepage from sewage treatment lagoons can further contribute to degraded water quality in the form of elevated nitrate levels. Improperly placed septic tank leach fields can cause similar types of contamination. Illegal waste dumping can introduce contaminants such as gasoline, pesticides, herbicides and other harmful chemicals. Septic tanks are also a source of pollution to some wells in both alluvial and granitic rocks. Septic tanks discharging into alluvium have a high potential to pollute wells producing from the same deposit because of high permeability and low gradient. In the winter, the rains raise the water table in these areas, which can exacerbate possible contamination.
The Project area is located within the eastern part of the Templeton to Paso Robles Watershed, in the portion known as the Neals Springs Planning Watershed. The
5. Effects Found to be Less than Significant

WATER QUALITY STANDARDS AND REQUIREMENTS AND SITE DRAINAGE

Implementation of the Project would not violate water quality standards or waste discharge requirements because the Project has been designed to meet the requirements for water quality under the Federal Clean Water Act and the SWRCB’s Phase II Municipal Stormwater Program.

Buildout of the BSP would be subject to NPDES permit requirements for discharges associated with construction activities, including preparation and implementation of Stormwater Pollution Prevention Plans (SWPPPs) for construction.

The site’s rolling topography requires that the Project be gracefully integrated into the natural landform to control stormwater runoff over the long term. The majority of the lots will be graded to provide building pads that will accommodate concrete slab foundations. The new lots will generally step up or down from one another from one to three feet along the street frontage. The BSP will involve a fully integrated low impact development stormwater system of collection, stormwater treatment, and detention facilities that will address stormwater requirements. The Project area has been divided into 33 drainage management areas, each with one or more water quality and drainage control features (see Maps I-8A and I-8B). These features may include channel restoration, linear bioretention, residential bioretention, biofiltration/channel restoration swales, regional bioretention basins, bioretention bulb-outs, street bioretention planters, street bioretention, residential bioretention planters, and bioretention adjacent to a natural channel. One specialized component of this integrated system will be application of measures implemented to protect and enhance the existing and new wetland features within the Project site. Specifically, a wetland mitigation program is proposed to expand the existing wetland along Creston Road at its intersection with Beechwood Drive. This low-lying area has the ready-made qualities for expansion of wetland vegetation and for replacement of some of the existing wetlands that would be impacted during construction. An additional wetland area would also be created to mitigate for the realignment of approximately 1,000 feet of channel drainage and associated wetland within the Project site’s interior drainage as well (see proposed Drainage Plans in Map I-6).

The Project would design all of the elements of the system in compliance with City and SWRCB policies to ensure that the Project would not result in a net increase in runoff flowrate and to ensure that stormwater runoff will be treated as required. As a result, the Project’s impacts on water quality and drainage would be less than significant.

INUNDATION FROM FLOOD, TSUNAMI, OR SEICHE

The Project site is not located within a 100-year flood hazard area nor a dam inundation area (FEMA 2019). Two dams with extremely high inundation hazard ratings, San Antonio and Nacimiento Dams, are located to the northwest of Paso Robles; however, their respective inundation areas do not reach the Project site (DWR 2019). Therefore, rupture of these dams (i.e., in the event of an earthquake, seiche, or catastrophic failure during a rain event) would not result in inundation of the Project area. Therefore, impacts on safety as a result of a dam failure is considered low. Impacts would be less than significant.
Map IV.D-1 View B:
Creston Road and New Intersection at Airport Road Looking Northwest Northeast
REGULATORY SETTING

State

California Department of Transportation (Caltrans)

Caltrans maintains the state highway system, including US 101 and SR 46, which pass through Paso Robles.

Senate Bill 743

To further the state’s commitment to the goals of Senate Bill (SB) 375, Assembly Bill (AB) 32, and AB 1358, SB 743 adds Chapter 2.7, Modernization of Transportation Analysis for Transit-Oriented Infill Projects, to Division 13 (Section 21099) of the Public Resources Code. Key provisions of SB 743 include reforming California Environmental Quality Act (CEQA) analysis for aesthetics and parking for urban infill projects and replacing the measurement of automobile delay with vehicle miles traveled (VMT) as a metric that can be used for measuring environmental impacts. Under SB 743, the focus of the environmental impacts of transportation shift from driver delay to reduction of greenhouse gas (GHG) emissions, creation of multimodal networks, and promotion of a mix of land uses, and LOS standards become local policy thresholds as adopted among individual agencies.

Currently, official measures and significance thresholds are still being developed and have not yet been adopted by the City.

Local

County of San Luis Obispo General Plan

The County has established the acceptable LOS on roads serving areas of the unincorporated county as LOS D in urban areas and LOS C in rural areas.

San Luis Obispo County Council of Governments Regional Transportation Plan

The San Luis Obispo County Council of Governments (SLOCOG) is a joint powers authority with a goal of facilitating cooperative regional and sub-regional planning, coordination, and technical assistance on issues of mutual concern. SLOCOG is the County’s designated Regional Transportation Planning Agency and therefore responsible for all regional transportation planning and programming activities, including development of a Regional Transportation Plan (RTP) to guide transportation policy. The SLOCOG RTP is a long-range planning document for the region’s transportation system. The RTP analyzes the transportation needs of the region into the future and identifies project priorities in order to improve the transportation system. The RTP offers a mix of mobility options and commits to a more sustainable transportation system through investments in public transportation, active transportation, highways, streets, and roads, as well as system efficiency. The RTP is updated every 4-5 years, and starting with the 2014 RTP, SLOCOG has developed a Sustainable Communities Strategy (SCS) that identifies land use patterns expected to reduce vehicle miles traveled (SLOCOG 2015).
determine at what unit count prior to the 674th unit the signal is warranted. The signal shall be installed prior to the issuance of the 674th building permit. If the signal is installed by the Olsen-South Chandler Ranch Specific Plan, then the applicant shall pay its fair share of the signal installation.

a. Creston Road/Meadowlark Road (Intersection #13): The applicant shall install a traffic signal at Creston Road/Meadowlark Road. The applicant shall conduct an intersection operations analysis prior to the issuance of the 554th building permit and install the signal if warranted at that time. If not warranted at the 554th building permit, the operations analysis shall determine at what unit count prior to the 911th unit the signal is warranted. The signal and associated improvements shall be installed prior to the issuance of the 911th building permit. If the signal is installed by the Olsen-South Chandler Ranch Specific Plan, then the applicant shall pay its fair share of the signal installation.

b. South River Road/Charolais Road (Intersection #20): The applicant shall construct a single-lane roundabout at South River Road/Charolais Road. The applicant shall conduct an intersection operations analysis prior to the issuance of the 250th building permit and install the signal if warranted at that time. If not warranted at the 250th building permit, the operations analysis shall determine at what unit count prior to the 554th unit the signal is warranted. The single-lane roundabout shall be installed prior to the issuance of the 554th building permit.

c. South River Road/Riverbank Lane (#18): The applicant shall install two-way left turn lane striping, between Riverbank Lane and Serenade Lane, at South River Road and Riverbank Lane. The improvement shall be installed with the South River Road/Charolais Road (Intersection #20) improvements.

**Plan Requirements and Timing.** The applicant is required to construct improvements to Creston Road/Stoney Creek Road (Intersection #12) prior to the issuance of building permit for the 554th unit, unless the intersection operations analysis identifies a later unit count. Improvements shall be installed no later than issuance of the building permit for the 674th unit. The applicant is required to construct improvements to Creston Road/Meadowlark Road (Intersection #13) prior to the issuance of building permit for the 554th unit, unless the intersection operations analysis identifies a later unit count. Improvements shall be installed no later than issuance of the building permit for the 911th unit. The applicant is required to construct improvements to South River Road/Charolais Road (Intersection #20) prior to the issuance of building permit for the 250th unit, unless the intersection operations analysis identifies a later unit count. Improvements shall be installed no later than issuance of the building permit for the 554th unit.

**Monitoring.** The City shall ensure compliance with TIF payment for Golden Hill Road/Union Road (Intersection #6) prior to final of each building permit. The City shall ensure completion of improvements prior to issuance of building permits for the specified unit.

**Significance After Mitigation**

With the implementation of Mitigation Measure TR-3(a) and TR-3(b), all intersections operating at unacceptable LOS as a result of the project under existing conditions would operate
### Mitigation Measures

Implement Mitigation Measure TR-6 Implementation of Improvements at Niblick Road/South River Road (#17) and TR-11 Fair Share Funding for Intersection Improvements.

The following mitigation measures have been identified to implement improvements designed to improve LOS at impacted facilities to the maximum extent feasible:

**TR-13 Fair Share Funding for Intersection (#16) Improvements**

The project shall contribute its equitable share to fund the following transportation improvements. Costs above and beyond the project’s equitable share shall be addressed through such options as fee credits, reimbursement agreements, or development agreements, based on city requirements.

a. 1st Street-Niblick Road/Spring Street (#16): Prior to building permit final for each unit, the applicant shall contribute their fair-share amount through the City’s TIF program for the installation of an eastbound right turn lane at this intersection.

**Plan Requirements and Timing.** The fair-share contribution for required improvements shall be submitted on a per-unit basis prior to building permit final for each unit. If the applicant is required to construct improvements at Creston Road/Niblick Road (#11), the improvements shall be completed prior to the building permit final of the 500th unit.

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<table>
<thead>
<tr>
<th></th>
<th></th>
<th>AM</th>
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</thead>
<tbody>
<tr>
<td>16. 1st Street-Niblick Road/Spring Street</td>
<td>NBL</td>
<td>165</td>
<td>AM</td>
<td>#158</td>
</tr>
<tr>
<td></td>
<td></td>
<td>PM</td>
<td>#158</td>
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<td></td>
<td></td>
<td>PM</td>
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<td></td>
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<td>208</td>
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<td>PM</td>
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<td>#274</td>
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<td></td>
<td></td>
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<td>148</td>
<td>74</td>
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<tr>
<td></td>
<td>WBL</td>
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<tr>
<td></td>
<td></td>
<td>PM</td>
<td>153</td>
<td>#171</td>
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</table>

1 Queue length that would not be exceeded 95% of the time.
2 Deceleration length of 530 feet has been subtracted from the storage length per the HDM for 60-mile-per-hour design speed.

# indicates that 95th percentile volume exceeds capacity; queue may be longer.

Bold indicates queue length longer than storage length.
should be reviewed, coordinated, and optimized. With coordination and overlaps, queues would improve to no project levels. The City’s Circulation Element accepts that this location will reach capacity.

- 13th Street/Paso Robles Street (#8): the northbound and eastbound queue lengths would further exceed storage length during at least 1 peak hour with the addition of traffic from the project. Bridge widening at this location in not included in the City’s Circulation Element and any widening in this location is unlikely; signal timing should be reviewed, coordinated, and optimized. If parking is removed on the east side of Paso Robles Street north of 12th Street, the northbound right-turn lane could be extended. With coordination and overlaps, queues would improve to no project levels. The City’s Circulation Element accepts that this location will reach capacity.

- River Road/Creston Road (#9): the northbound and southbound left-turn queue lengths would further exceed storage during both AM and PM peak hours with the addition of traffic from the project. Bridge widening at this location in not included in the City’s Circulation Element; signal timing should be reviewed, coordinated, and optimized. In addition to coordinated signal timing, the intersection would benefit from restriping of the southbound lanes to a dedicated left-turn, through, and right-turn lane. With these modifications, queues could be accommodated in the existing bay taper. The City’s Circulation Element accepts that this location will reach capacity.

Mitigation Measures

The following mitigation measures have been identified to implement improvements designed to improve LOS at impacted facilities to pre-project levels, or where this performance standard is unable to be met, to improve LOS to the maximum extent feasible:

Implement Mitigation Measure TR-4(a) and TR-4(b).

**TR-20 Implementation of Improvements at North River Road/Creston Road (#9)**

The applicant shall implement signal timing optimization (e.g. adaptive signal timing improving the efficiency of the corridor operations) at North River Road/Creston Road. The applicant shall construct lane striping for a dedicated left-turn, through, and right-turn lane on the southbound intersection leg. This shall be done in conjunction with TR-4(a), TR-4(b) and TR-4(c). Improvements at this intersection are not eligible for TIF Program credits.

**Plan Requirements and Timing.** The required improvements shall be constructed prior to the issuance of the building permit for the first unit. This improvement shall be done in conjunction with TR-4(a) and TR-4(b).

**Monitoring.** The City shall ensure compliance prior to the issuance of the building permit for the first unit.
**Monitoring.** The City shall ensure compliance with improvement installation prior to final of building permit for the first unit.

**Significance After Mitigation**

Impacts will be reduced to less than significant.

**Bike Access**

There are currently no marked bikeways adjacent to the school. Class II bike lanes are proposed on Meadowlark Road. West of Beechwood Drive, Meadowlark Road is 44-feet in width measured from curb to curb. The project proposes to restripe the roadway with two 10-foot travel lanes, two 5-foot Class 2 bike lanes, and on-street parallel parking 7-feet in width on both sides of the street.

**IMPACT TR-29 MEADOWLARK ROAD IS NOT CONSISTENT WITH THE CIRCULATION ELEMENT DUE TO LACK OF CLASS II BIKE LANES. THIS IS A SIGNIFICANT BUT MITIGABLE IMPACT (CLASS II).**

**Mitigation Measures**

**TR-29 Implementation Of Bike Lane Improvements**

To mitigate impacts, Class II bike lanes shall be installed on Meadowlark Road from Beechwood Drive to Creston Road.

**Plan Requirements and Timing.** The improvements to Meadowlark Road west of Beechwood Drive shall be installed prior to final of building permit for the first unit of the development. Improvements to Meadowlark Road east of Beechwood Drive shall be installed prior to final of building permits for the first unit for each subarea in Phase 1.

**Monitoring.** The City shall ensure compliance with improvement installation prior to final of building permit for the first unit.

**Significance After Mitigation**

Impacts will be reduced to less than significant.

**Student Drop-off and Pick-up**

The current student drop-off and pick-up area at Virginia Peterson Elementary School is located on the south side of Meadowlark Road between Falcon Drive and Beechwood Drive. Students have direct access from the school and can wait at this location for parents. No modification to this drop-off area is needed and the project would not result in impacts to this drop-off area.
### References


<table>
<thead>
<tr>
<th>Abbreviation</th>
<th>Description</th>
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<tbody>
<tr>
<td>RRFB</td>
<td>Rectangular rapid flashing beacon</td>
</tr>
<tr>
<td>RTP</td>
<td>Regional Transportation Plan</td>
</tr>
<tr>
<td>SB</td>
<td>Southbound</td>
</tr>
<tr>
<td>SBL</td>
<td>Southbound left turn</td>
</tr>
<tr>
<td>SCS</td>
<td>Sustainable Communities Strategy</td>
</tr>
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<td>SLOAPCD</td>
<td>San Luis Obispo County Air Pollution Control District</td>
</tr>
<tr>
<td>SLOCOG</td>
<td>San Luis Obispo County Council of Governments</td>
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<td>SLORTA</td>
<td>San Luis Obispo Regional Transit Authority</td>
</tr>
<tr>
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<td>State Route</td>
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<td>Travel Demand Model</td>
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<td>U.S. Highway 101</td>
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<td>Vehicles per hour</td>
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<tr>
<td>W</td>
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<tr>
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<td>Westbound left turn</td>
</tr>
<tr>
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<td>Westbound through</td>
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## Table IV.D-1. SB 32 Locally Appropriate Project-Specific Thresholds

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<thead>
<tr>
<th>2001 CAP Control Measure</th>
<th>Project Consistency</th>
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<tr>
<td><strong>Land Use Planning Strategies</strong></td>
<td>Consistent with Mitigation Incorporated</td>
</tr>
<tr>
<td><strong>I-1 Planning Compact Communities.</strong></td>
<td>The project would be located within the city’s existing urban boundary and has been designed with a mix of land uses, including single- and multifamily residential, commercial, recreational, and public land uses. This mix of land uses would serve to reduce vehicle trips. The project would be located within the Urban Reserve Line of the city. Bicycle facilities in the area consist of a mix of Class I and Class II bikeways. The proposed Specific Plan identifies pedestrian and bicycle facilities, including multi-modal boulevards separated by landscaped medians and multi-modal paths that would connect throughout the Plan Area, providing pedestrians and bicyclists with off-street circulation options. These bicycle and pedestrian facilities would encourage the use of alternative transportation modes and nearby existing transit facilities. However, future transit stop locations have not yet been identified for all roadways/locations in the Plan Area. Mitigation Measures AQ-1(a–c) and (e–f) would address this issue by incorporating a goal/policy into the Specific Plan to expand Paso Express Routes A and B with new stops in the Plan Area, providing public transit amenities in the Plan Area to facilitate this expansion, reducing vehicle queuing and improving the pedestrian environment in non-residential parking lots, and providing additional on-site bicycle parking at non-residential uses beyond CALGreen standards. In addition, Mitigation Measures T-1(a–c), T-2(a–b), T-5, and T-7(a–b) require traffic control devices and other various improvements to reduce vehicle congestion and promote traffic calming, which would also serve to improve the public transportation system.</td>
</tr>
<tr>
<td><strong>L-2 Providing for Mixed Land Use.</strong></td>
<td>Consistent</td>
</tr>
<tr>
<td>Communities should allow a mixture of land uses that enables people to walk or bicycle to work or to purchase necessary household items or service, at locations convenient to their neighborhood.</td>
<td>The project has been designed with a mix of land uses, including single- and multi-family residential, commercial, recreational, and public land uses. This mix of land uses would serve to reduce vehicle trips by enabling people to walk or bicycle to work or to purchase necessary household items or services at convenient locations.</td>
</tr>
<tr>
<td><strong>L-3 Balancing Jobs and Housing.</strong></td>
<td>Consistent</td>
</tr>
<tr>
<td>Within cities and unincorporated communities, the gap between the availability of jobs and housing should be narrowed and should not be allowed to expand.</td>
<td>According to SLOCOG’s 2019 Regional Housing Needs Assessment Proposed Final Plan, identifies that the North County Subregion has a Jobs/Housing ratio of 0.87; indicating the need for more job opportunities. Paso Robles has approximately 27% more jobs than housing units. The project would add more housing units than jobs in Paso Robles and would therefore help narrow the gap between the availability of jobs and housing. As a result, the project would help to support and promote local and regional improvements related to increased transportation mobility and reductions in VMT (Appendix E).</td>
</tr>
</tbody>
</table>
c Incorporate a goal/policy into the Specific Plan to Develop an educational program with San Luis Obispo Regional Rideshare to provide occupants of non-residential uses with alternative transportation and smart commute information (e.g., transportation board, electronic kiosk, new hire packets, web portal, newsletters, social media, etc.).

d Working with SLO Regional Rideshare, incorporate a goal/policy into the Specific Plan to implement programs that reduce both residential and non-residential VMT within the Beechwood Development. Incorporate a goal/policy into the Specific Plan to implement programs to reduce employee VMT at non-residential uses (e.g., incentives; SLO Regional Rideshare trip reduction program; bicycle share programs; shuttles/vanpools; on-site employee lockers, showers, housing; alternative employee schedules [e.g., 9/80s, 4/10s, telecommuting, satellite worksites, etc.]).

e Implement circulation design elements in parking lots for non-residential uses to reduce vehicle queuing and improve the pedestrian environment.

f Exceed CALGreen standards for providing on-site bicycle parking at non-residential uses by 25%.

Plan Requirements and Timing. The project applicant shall incorporate Alternative Transportation and Transportation Demand Management Measures into the Specific Plan. Developers of projects in the Plan Area shall incorporate applicable transportation demand measures into project plans and submit documentation to the city that employers in non-residential components of the project have either implemented trip reduction measures or provided proof that applicable measures are infeasible.

Monitoring. The City shall verify that Alternative Transportation and Transportation Demand Management Measures have been incorporated into the Specific Plan and that applicable improvements are included in developments in the Plan Area prior to issuance of occupancy permits. The City shall verify that public transit amenities have been installed prior to the issuance of the first occupancy permit. The City shall verify that on-site circulation design elements in parking lots and required on-site bicycle parking have been installed prior to the issuance of occupancy permits for non-residential uses.

Significance After Mitigation

Implementation of Mitigation Measure AQ-1, T-1(a-c), T-2(a-b), T-5, and T-7(a-b) would require the incorporation of alternative transportation facilities, the promotion of alternative work schedules, the payment of fair share fees for public transit improvements, and the construction of circulation system improvements, all of which would address potential inconsistencies with the 2001 CAP transportation control measures and land use strategies. Therefore, impacts related to consistency with the 2001 CAP would be less than significant with mitigation incorporated (Class II).
construction equipment, while fugitive dust (PM$_{10}$) would be emitted by activities that disturb the soil, such as demolition, grading and excavation, road construction, and building construction. The project’s estimated maximum daily and quarterly emissions are shown in Table IV.I-7 and Table IV.I-8. Modeling of construction emissions assumed that construction would occur continuously over a period of 21 months (inclusive of all ground-disturbing and construction activities), which is a conservatively brief timeframe based on the size of the Plan Area and scale of proposed development in the Plan Area. Construction would likely occur discontinuously or over a longer duration (buildout is estimated to occur over 9 years), which would result in lower daily air pollutant emissions than shown in Table IV.I-7.

The emissions estimates in the Tables IV.1-7 and IV.1-8 below assume that during a 21-month period the following construction would occur as a “typical phase” for purposes of modeling emissions in CalEEMod.

- 5.6 acres of asphalt road
- 2.7 acres of City Park
- 11 Mid-Rise apartments & 25 Condo/Townhome
- 75 Single Family Homes

It is worth noting that this “typical phase” represents 9% of the total project.

### Table IV.I-7. Estimated Maximum Daily Construction Air Pollutant Emissions

<table>
<thead>
<tr>
<th>Construction Year</th>
<th>Maximum Daily Emissions (lbs/day)</th>
<th>ROG + NO$_x$</th>
<th>DPM$^2$</th>
</tr>
</thead>
<tbody>
<tr>
<td>Construction Year 2020</td>
<td>30.53</td>
<td>30.53</td>
<td>1.17</td>
</tr>
<tr>
<td>Construction Year 2021</td>
<td>148.98</td>
<td>148.98</td>
<td>1.77</td>
</tr>
<tr>
<td>SLOAPCD Daily Threshold</td>
<td></td>
<td>137</td>
<td>7</td>
</tr>
<tr>
<td>Threshold Exceeded?</td>
<td>Yes</td>
<td>No</td>
<td></td>
</tr>
</tbody>
</table>

Notes: All emissions modeling was completed using CalEEMod. Due to the size of the Plan Area and scale of potential development in the Plan Area, this analysis conservatively assumes that building construction, paving, and architectural coating could potentially occur simultaneously on any given day. Detailed modeling results are included in Appendix -Vol I demonstrating the mitigated and un-mitigated emissions. Because the actual construction phase schedule is unknown at this time, the emissions estimates (above) derived in CalEEMod excluded the retail shopping center from the daily emissions estimates.

1. Maximum daily emissions include on-site and off-site emissions.
2. DPM is equal to total exhaust PM$_{10}$ emissions.

Source: Appendix E

### Table IV.I-8. Estimated Maximum Quarterly Construction Air Pollutant Emissions

<table>
<thead>
<tr>
<th>Construction Year</th>
<th>Maximum Quarterly Emissions (tons/quarter)</th>
<th>ROG + NO$_x$</th>
<th>DPM$^2$</th>
<th>Dust$^4$</th>
</tr>
</thead>
<tbody>
<tr>
<td>Construction Year 2020</td>
<td>0.84</td>
<td>0.03</td>
<td>0.06</td>
<td></td>
</tr>
<tr>
<td>Construction Year 2021</td>
<td>0.83</td>
<td>0.02</td>
<td>0.04</td>
<td></td>
</tr>
<tr>
<td>SLOAPCD Quarterly Tier 1 Threshold</td>
<td>2.5</td>
<td>0.13</td>
<td>2.5</td>
<td></td>
</tr>
<tr>
<td>Threshold Exceeded?</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>SLOAPCD Quarterly Tier 2 Threshold</td>
<td>6.3</td>
<td>0.32</td>
<td>None</td>
<td></td>
</tr>
<tr>
<td>Threshold Exceeded?</td>
<td>No</td>
<td>No</td>
<td>N/A</td>
<td></td>
</tr>
</tbody>
</table>

1. Maximum daily emissions include on-site and off-site emissions.
2. DPM is equal to total exhaust PM$_{10}$ emissions.
4. Dust emissions include dry and wet PM$_{10}$.
As shown in Tables IV.1-7 and IV.1-8, the project’s combined ROG and NOX emissions would exceed SLOAPCD’s daily thresholds but not the quarterly Tier 1 or Tier 2 thresholds. The project’s DPM emissions would not exceed the daily threshold or quarterly Tier 1 or Tier 2 thresholds. In addition, the project’s dust emissions would not exceed the daily threshold or quarterly Tier 1 threshold primarily because no soil material transport would be required and because grading activities would not be intensive due to a relatively long grading phase as compared to the size of the disturbance area. Nonetheless, SLOAPCD requires any project with grading areas greater than 4 acres or that are within 1,000 feet of any sensitive receptor to implement standard fugitive dust mitigation measures. Therefore, impacts would be potentially significant, and implementation of Mitigation Measures AQ-2(a) through AQ-2(g) would be required.

Mitigation Measures

Mitigation Measures AQ-2(a) through AQ-2(f) are required to reduce construction emissions of ROG and NOX. Although the project’s fugitive dust emissions would not exceed the quarterly Tier 1 or Tier 2 thresholds, SLOAPCD requires any project with grading areas greater than 4 acres or that are within 1,000 feet of any sensitive receptor to implement standard fugitive dust mitigation measures. Therefore, Mitigation Measure AQ-2(g) is also required to minimize fugitive dust emissions.

Furthermore, as part of the Construction Area management Plan (CAMP development identified below) at the time the proposed construction schedule is known, the actual daily construction fleet air pollutant emissions will be re-evaluated to account for the reasonable worst-case construction phase and the requirement for ongoing reporting of off-road construction vehicles; this will ensure the Best Available Control Technology is applied to the actual fleet throughout Construction.

**AQ-2(a) Construction Activity Management Plan**

Prior to the start of construction activities within the Plan Area, the project applicant shall prepare a CAMP to reduce construction-generated emissions. At a minimum, the CAMP shall incorporate SLOAPCD-recommended measures for the control of construction-generated emissions and shall be submitted to the city for review and approval with the grading permit application. If implementation of SLOAPCD-recommended Standard and BACT measures cannot reduce emissions below applicable SLOAPCD emissions thresholds, off-site mitigation may be required in coordination with SLOAPCD. The emission control measures and potential off-site mitigation requirements contained in the CAMP shall apply to all construction activities facilitated by the proposed Specific Plan. The CAMP shall include the following elements:
a. A Dust Control Management Plan that encompasses all, but is not limited to, dust control measures;
b. Tabulation of on- and off-road construction equipment (age, horsepower and miles, and/or hours of operation);
c. A schedule that restricts construction truck trips to non-peak hours to reduce peak-hour emissions;
d. A limit on the length of the construction work-day period, if necessary;
e. A schedule that phases construction activities, if appropriate; and
f. Special provisions to address high heat and windy conditions.
g. The Applicant shall hire an independent 3rd party ARB certified Visible Emissions Monitor to monitor dust emissions from the project site. The Monitor shall be available to respond to complaints or reports of visible dust leaving the property during construction, on nights, weekends and holidays to ensure dust from the construction site is not leaving the construction site. The Monitor will maintain a log of visible emission observations, which includes images taken of dust being generated on the property and will make that log available to APCD inspectors on request. Contact information for the Visible Emissions Monitor shall be submitted to the APCD prior to the start of on-site grading.
h. Upon completion of CAMP item e (above) the Applicant shall report to the San Luis Obispo APCD the reasonable worst-case scenario construction phase emissions for the actual construction fleet. The report of actual construction fleet will also describe the application of BATC per MM AQ-2(C) below.

The project applicant shall retain a third-party air quality consultant to conduct periodic monitoring of implementation of the CAMP during construction activities in the Plan Area. The third-party consultant shall be approved by the City and shall submit quarterly reports to the City that evaluate implementation of the required elements of the CAMP.

Plan Requirements and Timing. The project applicant shall submit the CAMP to the City and SLOAPCD for review prior to the issuance of grading permits for the first project phase.

Monitoring. The City shall verify compliance with the CAMP through review of the third-party consultant evaluation reports.

AQ-2(b) Standard Control Measures for Construction Equipment.

The following standard mitigation measures shall be included in the CAMP and implemented during construction activities in the Plan Area to reduce construction-generated NOx, ROG, and DPM:
a. Maintain all construction equipment in proper tune according to manufacturer’s specifications;
City of Paso Robles Climate Action Plan

The City’s Climate Action Plan is a long-range plan to reduce GHG emissions from City government operations and community activities within Paso Robles. The Climate Action Plan is a qualified GHG reduction plan consistent with State CEQA Guidelines Section 15183.5 through year 2030. However, the proposed Specific Plan has a buildout year between 2024 and 2030 for purposes of this EIR year 2030 is used. As described in Impact GHG-1, this analysis does rely on consistency with the City’s Climate Action Plan strategies to evaluate the significance of the project’s GHG emissions; however, the City’s Climate Action Plan includes a worksheet that identifies various “mandatory” as well as “voluntary” GHG reduction measures which continue to apply to new development in Paso Robles, including the proposed Plan Area. To be consistent with the CAP, the proposed Specific Plan would need to incorporate all “mandatory” actions as binding and enforceable components. If the project could not meet one or more of the “mandatory” actions, substitutions may be made provided equivalent reductions can be demonstrated (City of Paso Robles 2013). Based on a review of the City’s CAP, the proposed Specific Plan would not include all applicable mandatory measures, including measures requiring high-efficiency lighting (Measure E-5), pedestrian and bicycle network amenities (Measures TL-1 and TL-2), traffic calming improvements (Measure TL-2), access to public transit (Measure TL-3), CALGreen water efficiency standards (Measure W-1), construction waste diversion (Measure S-1), and drought-tolerant tree planting (Measure T-1). The proposed Specific Plan identifies pedestrian and bicycle facilities along some of the proposed on-site roadways, which would provide access to and promote the use of nearby existing bicycle and transit facilities. However, given the conceptual nature of the proposed project, detailed plans have not been developed for all roadways/locations. As a result, the project would be inconsistent with this measure. Therefore, the project would be inconsistent with the City’s CAP. As a result, this impact would be potentially significant.

SLOCOG 2019 RTP

SLOCOG’s 2019 RTP, which also includes the region’s SCS, provides land use and transportation strategies to reduce regional GHG emissions. A major part of achieving the GHG reduction goals of SB 32 are strategies to promote sustainable communities, which include features such as ZNE buildings, improved transportation choices that result in reduced per capita VMT, and the increased use of low-carbon fuels and more efficient vehicles. Under SB 375, the development and implementation of SCSs, which link transportation, land use, housing, and climate policy at the regional level, are designed to reduce per capita mobile source GHG emissions through implementation of measures that would result in reductions in per capita VMT. In 2018, CARB adopted more aggressive SB 375 targets as a means of supporting progress toward the 2017 Scoping Plan goals. For the SLOCOG region, CARB set passenger vehicle GHG reduction targets of an 3% decrease in per capita VMT by 2020 and an approximately 8% decrease in per capita VMT by 2035. Therefore it is assumed a decrease in GHG emission will be relative in the future. This equates to a reduction from 22.7 daily VMT per capita in 2005 to 20.7 daily VMT per capita for 2035 (SLOCOG 2019). Assuming a linear reduction in daily VMT per capita, the target reduction for 2024 (the project’s buildout year) would equate to a daily rate of approximately 21.4 VMT per capita.
**Significance After Mitigation**

Mitigation Measure GHG-1 includes all “mandatory” GHG-reduction measures identified in the city’s CAP. Proposed non-residential land uses would also be designed and built to promote the use of electrically-powered building mechanical equipment in support of future ZNE goals for nonresidential structures. Therefore, Mitigation Measure GHG-1 would ensure that the project would be consistent with the city’s CAP. Implementation of Mitigation Measures AQ-1 and AQ-3 would reduce GHG emission relative to 2005 daily VMT per capita and ensure that the project would be consistent with SLOCOG’s 2019 RTP VMT targets for 2020-2024 and 2030-2035.

For informational purposes, Table IV.I-15 summarizes GHG emissions reductions achieved by implementation of Mitigation Measure GHG-1 as well as the mobile source emissions reduction measures described in Mitigation Measure AQ-1. As discussed under Impact GHG-1, impacts related to GHG emissions would be less than significant without mitigation because the project’s GHG emissions would not exceed the thresholds for buildout year 2030. Nevertheless, as shown in Table IV.I-15, implementation of Mitigation Measures GHG-2 and AQ-1 would reduce project-related GHG emissions further below the level of significance.

**Table IV.D-2. 2030 Combined Annual GHG Emissions**

<table>
<thead>
<tr>
<th>Emission Source</th>
<th>Annual Emissions (MT CO(_2)e)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Construction</td>
<td>23.14</td>
</tr>
<tr>
<td>Rational</td>
<td></td>
</tr>
<tr>
<td>Area(^1)</td>
<td>20.74</td>
</tr>
<tr>
<td>Energy(^2)</td>
<td>1,440.65</td>
</tr>
<tr>
<td>Mobile(^3)</td>
<td>6,370.60</td>
</tr>
<tr>
<td>Solid Waste(^4)</td>
<td>478.05</td>
</tr>
<tr>
<td>Water(^5)</td>
<td>99.85</td>
</tr>
<tr>
<td>Emissions</td>
<td>8,433.03</td>
</tr>
<tr>
<td>Service Population</td>
<td>2,854</td>
</tr>
<tr>
<td>Emissions per Service Person</td>
<td>2.95</td>
</tr>
<tr>
<td>Threshold Exceeded?</td>
<td>3.3</td>
</tr>
</tbody>
</table>

Notes: All numbers may not sum exactly due to rounding.

\(^1\) The only area source of GHG emissions in CalEEMod is landscaping equipment associated with residential, non-residential, school, and recreational uses.

\(^2\) Includes adjustments to account for the California Renewable Portfolio Standards requirements and a 50% reduction in residential energy use due to the requirements of the 2019 Building Energy Efficiency Standards (CEC 2018)

\(^3\) Fleet mix for non-residential land uses based on default fleet mix contained in CalEEMod for San Luis Obispo County. Fleet mix for residential land uses based on the vehicle distribution for residential land uses obtained from the San Joaquin Valley Air Pollution Control District and applied to San Luis Obispo County default fleet mix per SLOAPCD recommendations. Trip-generation rates for residential land uses and elementary school derived from the City’s Travel Demand Forecasting Model (2009). Trip-generation rates for commercial uses and health club based on the trip generation rates derived from the traffic analysis. Includes emissions of CH\(_4\), N\(_2\)O, and CO\(_2\), expressed in CO\(_2\)e.

\(^4\) Based on an average annual waste diversion/recycling rate of 50% based on statewide averages.

\(^5\) Includes the use of low-flow water fixtures and water-efficient irrigation systems, per current building code requirements.

Source: Appendix E
Table IV.D-3. City of Paso Robles Single and Multiple Year Supply and Demand Projections

<table>
<thead>
<tr>
<th>Acre-feet/year</th>
<th>2020</th>
<th>2025</th>
<th>2030</th>
<th>2035</th>
<th>2040</th>
<th>Buildout (2045 or later)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>UWMP Supply and Demand Projections</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Demand totals</td>
<td>7.089</td>
<td>7.575</td>
<td>8.061</td>
<td>8.546</td>
<td>9.032</td>
<td>9.519</td>
</tr>
<tr>
<td>Difference</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td><strong>Supply and Demand Projections (including portion of Project not included in UWMP)</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Demand totals</td>
<td>7.090</td>
<td>7.590</td>
<td>8.096</td>
<td>8.581</td>
<td>9.067</td>
<td>9.554</td>
</tr>
<tr>
<td>Difference</td>
<td>1</td>
<td>15</td>
<td>35</td>
<td>35</td>
<td>35</td>
<td>35</td>
</tr>
</tbody>
</table>

The Project area currently relies on groundwater from private onsite wells for its water supply and uses an estimated 67 AFY. These wells will be either properly abandoned or taken over by the City for municipal use. Once completed, the Project will use an estimated 283 AFY of water resulting in a net increase of water use of 216 AFY.

Water supply needed to serve the Project’s residential water demand (248 AFY) is included in the 2015 UWMP and thus no significant impact would result from this demand. Water supply needed to serve the commercial water demand (about 10 AFY) and the non-residential irrigation water demand (about 25 AFY) are not included in the UWMP projections, but the City has the additional 35 AFY of supply available from its water supply portfolio of Nacimiento water, groundwater from the Paso Robles Groundwater Basin and water from the Salinas River, and no significant adverse impact on water supply is identified.

The connection points to existing wastewater facilities have been identified in the BSP. Existing lift station #11 shall serve the project during the evaluations of sewer lift stations # 11 will occur at the Tentative Tract Map stage.

Potential impacts to water distribution system infrastructure from development of the Specific Plan areas were evaluated in the City’s 2014 Water Maser Plan and subsequent analysis to determine new on-site and off-site water system improvements needed to serve the Project.
L. LAND USE/PLANNING

1. Environmental Issue

This section evaluates impacts related to land use and planning. Both land use compatibility issues and consistency with land use policies are discussed. The analysis of land use and planning impacts is based on existing land use patterns in the vicinity of the project site, and the applicable policies and standards in the City of Paso Robles General Plan and the San Luis Obispo Council of Governments (SLOCOG) 2019 Regional Transportation Plan.

2. Scoping Issues for Land Use/Planning

During the 30-day public review period for the Notice of Preparation (NOP), written and oral comments were received from agencies and the public. No issues were raised during the NOP process for this topic.

3. Environmental and Regulatory Setting

ENVIRONMENTAL SETTING

Regional Setting

The City of Paso Robles encompasses approximately 19.9 square miles in northern San Luis Obispo County. The city is located on the Salinas River, approximately 25 miles north of the City of San Luis Obispo and approximately 91 miles southeast of the City of Salinas. The unincorporated community of Templeton is located approximately 5 miles to the south, and the unincorporated community of San Miguel is located approximately 8 miles to the north.

Project Site Setting

The Beechwood Specific Plan (BSP) area is located within the city limits on the southeastern edge of the City of Paso Robles, on the urban/rural fringe with San Luis Obispo County. Urban development is generally located northwest and west of the BSP, and rural areas are located east, southwest, and south of the BSP. Map I-1 in Chapter 1, Project Description, shows the site in its local context.

The 234.83-acre Specific Plan area is located within the southeastern corner of the city. Approximately 23.78 acres of this area is a Pacific Gas & Electric (PG&E) utility corridor and would not be developed. In addition, there is a private farmhouse on 2.16 acres that is not part of the project. The remaining, approximately 208.89-acre area is the BSP development site. The southeastern, southwestern and eastern border of the BSP are located on the city limit boundary. Meadowlark Road, Beechwood Drive, and Creston Road are located along the northern, eastern, and southwestern boundary of the BSP area. Cattleman Way, which connects to Beechwood Drive, is the only public roadway into the BSP.
Annexation and Development History. The approximately 209-acre BSP site was annexed into the City of Paso Robles in October 2004. The City amended the General Plan and placed a Specific Plan Overlay on the BSP area (City of Paso Robles 2020). Policy LU-2G of the Paso
Class II bike lanes are intended to delineate the right-of-way assigned to bicyclists and motorists and to provide for more predictable movements by each.

**Regional Housing Needs Allocation**

The State of California requires that each jurisdiction plan for its share of the housing for people of all housing income levels. The Regional Housing Needs Allocation (RHNA) is a process where each community is assigned a share of housing needs for an eight-year period. The City of Paso Robles participates in this process as part of the Council of Governments for the San Luis Obispo region. The most recent RHNA was prepared in 2019 as part of the Regional Housing Needs Plan (SLOCOG 2013). Section 5.1 of the Housing Element cites Regional Housing Needs Allocation requirements for the Beechwood area as 120 units at a minimum density of 20 du/ac for Low and Very Low Income groups and 550 units at a minimum density of 3 du/ac for Above Moderate income groups. The allocation for the Beechwood Plan Area cited in the Housing Element is based on the SLOCOG April 2013 RHNA Plan. The 2019 Regional Housing Needs Allocation Proposed Final Plan, released in August 2019, indicates an increase in housing needs for the region and the City of Paso Robles between 2019 and 2028. This document identified a City of Paso Robles housing unit allocation of 492 units by the following income levels: 123 units for Very Low Income; 77 units for Low Income; 87 units for Moderate Income; and 206 units for Above Moderate Income.

**Standards of Significance**

The following criteria are based on Appendix G of the State CEQA Guidelines. An impact is considered significant if the project would result in one or more of the following conditions:

- Physically divide an established community; and/or

- Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Applicable policies from the San Luis Obispo County Air Pollution Control District (SLOAPCD) 2001 Clean Air Plan and the 2013 City of Paso Robles Climate Action Plan are discussed in Section IV.I, Air Quality and Greenhouse Gas Emissions.

**Project Impacts and Mitigation Measures**

**IMPACT LU-1** THE PROJECT WOULD FACILITATE DEVELOPMENT OF A LARGE, PRIMARILY UNDEVELOPED AREA IN THE CITY, AND WOULD EXTEND CIRCULATION ROUTES THROUGH THE SOUTHEASTERN PORTION OF THE CITY. THE PROJECT WOULD NOT DIVIDE AN ESTABLISHED COMMUNITY, AND THIS IMPACT WOULD BE LESS THAN SIGNIFICANT (CLASS III).

The physical division of an established community typically refers to the construction of a physical feature (such as a highway) or removal of a means of access (such as a local road or bridge) that
would restrict movement within a community or between a community and adjacent area. An example of this would be the construction of a highway through an established
<table>
<thead>
<tr>
<th>Policy S-1D</th>
<th>Structural Safety. Rely on the City’s planning and building permit review process to ensure that existing and proposed structures are adequately designed, and to reduce susceptibility to damage from fire, flooding, and geologic hazards.</th>
<th>Consistent. Development in the Specific Plan area would be required to comply with the California Fire Code, which provides uniform fire prevention, hazardous material, and building construction regulations. In addition, the project would be required to adhere to the 2016 CBC Chapter 7A Partial Requirements which require certain construction materials and methods to minimize wildfire exposure hazards. These include Class A fire rated roof assemblies, flame and ember intrusion resistant vents, and non-combustible building side materials. In addition, Mitigation Measure HWQ-4, requiring preparation of a Conditional Letter of Map Revision (CLOMR)/Letter of Map Revision (LOMR), is required to reduce impacts related to locating housing with a 100-year floodplain and increasing the potential for pollutant release upon inundation of flood hazard areas.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy S-1E</td>
<td>Hazardous Materials. The City shall comply with Government code requirements regarding the use, storage, and transportation of hazardous materials.</td>
<td>Consistent. The transport, storage, use, or disposal of hazardous materials for the project would be subject to federal, state, and local regulations pertaining to such issues.</td>
</tr>
<tr>
<td>Policy S-1G</td>
<td>Maintain the structural and operational integrity of essential public facilities during flooding by taking safe guards such as locating new facilities outside of flood zones or areas subject to localized flooding, and audit existing facilities in these areas to determine if building upgrades should be considered to reduce the potential for future flooding.</td>
<td>Consistent. The project would be required to include a CLOMR application requesting that the FEMA 100-year floodplain boundary be redefined, and that the FIRM revised by FEMA to be consistent with the post-development 100-year floodplain as mapped based on the hydrologic and hydraulic models consistent with the proposed site development, creek improvements and bridge, site and floodplain grading, and proposed detention facilities. In addition, Mitigation Measure HWQ-4, requiring preparation of CLOMR/LOMR, is required to reduce impacts related to locating housing with a 100-year floodplain and increasing the potential for pollutant release upon inundation of flood hazard areas. A Pacific Gas and Electric (PG&amp;E) transmission line utility easement crosses a portion of the Olsen Ranch property from the southwest to the northeast. The easement includes both 250 kilovolt (kV) and 500 kV circuit lattice tower lines. The project would revise the Safety Element setback guidelines for development near the existing high voltage (250 kV and 500 kV) power lines that cross the Specific Plan area (Policy SF-1).</td>
</tr>
</tbody>
</table>

As shown in Table IV.L.3, the project would be consistent with applicable city General Plan policies. The Specific Plan and related actions would facilitate development of the Specific Plan...
Cumulative Impacts

As has been described previously in this section, the proposed Project would result in development of the BSP area with residential, commercial, open space and park use; this area currently has residential and commercial land use designations within the General Plan and is anticipated to include development. Development of the proposed Project is generally consistent with the vision for development within this area of the City and would not cause unplanned growth beyond the City boundary. Conversion of the site to residential and commercial uses, in additional to other anticipated projects within the City, would result in significant and unavoidable cumulative impacts resulting from General Plan land use designations identified in the General Plan EIR for Transportation, Air Quality, Noise and Agricultural resources. Other impacts would be considered less than significant with mitigation, as identified in the individual topics in the EIR.

List of Abbreviated Terms

<table>
<thead>
<tr>
<th>Abbreviation</th>
<th>Term</th>
</tr>
</thead>
<tbody>
<tr>
<td>BSP</td>
<td>Beechwood Specific Plan</td>
</tr>
<tr>
<td>CAP</td>
<td>Climate Action Plan</td>
</tr>
<tr>
<td>CEQA</td>
<td>California Environmental Quality Act</td>
</tr>
<tr>
<td>CFD</td>
<td>Community Facilities District</td>
</tr>
<tr>
<td>CLOMR</td>
<td>Conditional Letter of Map Revision</td>
</tr>
<tr>
<td>FEMA</td>
<td>Federal Emergency Management Agency</td>
</tr>
<tr>
<td>GHG</td>
<td>Greenhouse Gas</td>
</tr>
<tr>
<td>HOA</td>
<td>Homeowner’s Association</td>
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<tr>
<td>LOMR</td>
<td>Letter of Map Revision</td>
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<td>LUCE</td>
<td>Land Use and Circulation Element</td>
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<td>Regional Transportation Plan</td>
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<td>SCS</td>
<td>Sustainable Communities Strategy</td>
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<td>SLOAPCD</td>
<td>San Luis Obispo County Air Pollution Control District</td>
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<td>SLOCOG</td>
<td>San Luis Obispo Council of Governments</td>
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References

city’s Fiscal Impact Report, which funds additional staff and facilities as needed. This would offset the increased demand for police services by providing funding for additional police officers to serve the area. The project would not result in a need for new or expanded police facilities; therefore, the effect of the project on the demand for police services would be less than significant.

**Mitigation Measures**

This impact would be less than significant without the need for mitigation.

**IMPACT PS-3 DEVELOPMENT FACILITATED BY THE SPECIFIC PLAN WOULD INCREASE THE DEMAND FOR SCHOOLS SUCH THAT NEW FACILITIES AND STAFF WOULD BE REQUIRED TO PROVIDE ADDITIONAL STUDENT CAPACITY. THROUGH THE REQUIRED PAYMENT OF STATE-MANDATED IMPACT MITIGATION FEES, POTENTIAL IMPACTS TO PUBLIC SCHOOLS WOULD BE LESS THAN SIGNIFICANT (CLASS III).**

Based on PRJUSD student generation rates of 0.61 students per household the project would contribute approximately 356-556 students to the District (911 dwelling units x 0.61 students/dwelling unit). The student generation factor is generalized to aggregate all grade levels because over the phased 10, or more, year buildout of the Specific Plan the ages and demographic mix could change making more precise predictions of grade level additions speculative. Under existing conditions, students would be located in the boundaries for Virginia Peterson Elementary School, Daniel Lewis Middle School, and Paso Robles High School.

Based on the District’s district-wide enrollment projects, a new school will be required within 5 to 8 years to meet projected City population increases. The likely location of that school from a population and operation standpoint has been identified by the District as in the southeast quadrant of the City such as within the Olsen Specific Plan property. Although environmental impacts arising from the construction of a new school are foreseeable, the specific nature and magnitude of the impacts is to a large degree speculative because no physical site has been identified.

However, in general, certain estimations can be made on impacts related to traffic, noise, air quality. Given the setting and baseline environmental conditions impacts arising from traffic, noise and air quality are likely to be significant requiring mitigation to reduce to less than significant levels. Short-term impacts related to construction noise, dust and traffic are foreseeable. Due to the temporary nature of these activities, impacts would likely be less than significant.

If the ultimate site for the school is within the Olsen Specific Plan area, it can be anticipated that many of the types of impacts that have been identified for the Beechwood Specific Plan would be similar at the school site because the Olsen and Beechwood properties share many characteristics.

Under the discussion of Cumulative Impacts, below, the types of impacts and probable significance levels that could arise from construction of a new school, as well as the potential new fire station and police station identified above, are discussed. These conclusions are based on
Project Impacts and Mitigation Measures

**IMPACT PH-1**  THE PROJECT WOULD NOT RESULT IN GROWTH IN THE PLANNING AREA THAT IS SUBSTANTIALLY GREATER THAN PROJECTED IN THE SLOCOG REGIONAL GROWTH FORECAST OR CITY’S GENERAL PLAN. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT (CLASS III).

The City of Paso Robles has a population of 31,559 (DOF 2018). The BSP project would result in development of a maximum number of 911 dwelling units with high-density, medium-density, and low-density residential units. Using the city’s average rate of 2.72 people per household, construction of the project would accommodate an estimated 2,478 residents (DOF 2018). The BSP planning area currently includes four existing rural residential units. An estimated 11 people currently reside in the Specific Plan area (4 dwelling units x 2.72 people/unit) and are accounted for in the city’s existing population. Two of the dwelling units would remain and be included in the 911 dwelling units and two would be removed, by the proposed project. As such, project implementation would result in a net increase of 2,467 new residents and 907 dwellings. Table IV.N-5 presents the 2018 and projected 2050 population and housing estimates for the city based on the SLOCOG 2050 Regional Growth Forecast for San Luis Obispo County.

**Table IV.0-1. Paso Robles Population and Housing Projections**

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</thead>
<tbody>
<tr>
<td>Population (# of residents)</td>
<td>31,559</td>
<td>11</td>
<td>2,478</td>
<td>2467</td>
<td>7.8%</td>
<td>37,858</td>
<td>6,299</td>
<td>20.0%</td>
</tr>
<tr>
<td>Housing (# of units; total/occupied)</td>
<td>11,426/10,833</td>
<td>4</td>
<td>911</td>
<td>907</td>
<td>7.9%</td>
<td>14,342†</td>
<td>2,916‡</td>
<td>25.5%</td>
</tr>
</tbody>
</table>

Notes:
1. SLOCOG 2050 Regional Housing Unit Projections based on housing units.
2. Change in housing units from 2018 to 2040.
Sources: * DOF 2018; † SLOCOG 2017

When added to the existing population within the city of approximately 31,559 (DOF 2018), buildout of the Specific Plan Area would increase the city’s total population to an estimated 34,026 residents, an increase of 7.8 percent. The population projections in the city’s General Plan Land Use Element account for development of the BSP planning area, and the potential impacts the population projections for Paso Robles have been addressed in the General Plan Update EIR. The General Plan development potential described in Policy LU-1A describes a maximum development potential of 16,818 residential dwelling units in the city. Further, the maximum buildout of the BSP planning area under the current General Plan land use designations is 674, as prescribed by Policy LU-G of the city’s General Plan. The BSP and associated general plan amendment to update the land use designations and Specific Plan Overlay would allow a maximum density of 911 dwelling units in the BSP planning area. Thus, the increase in the city’s population and residential dwelling units resulting from the project would be consistent with the
Part Two:
Findings of Fact and
Statement of Overriding
Consideration
SCH # 2018061064

Beechwood Specific
Plan, General Plan
Amendment and
Rezoning

City of El Paso de Robles
1000 Spring Street
Paso Robles, California 93446

Prepared by:

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San Luis Obispo CA
93401
805.781.9800
Principle: LINDSAY CORICA ASLA
SECTION 1. ENVIRONMENTAL DETERMINATION

The City Council of the City of Paso Robles considers and relies on the Final Environmental Impact Report (EIR; State Clearinghouse Number 2018061064) for the Beechwood Specific Plan in determining to carry out the project. The Final EIR consists of the Draft EIR, responses to comments on the Draft EIR, a list of persons and agencies commenting on the Draft EIR, a Mitigation Monitoring and Reporting Program, and technical appendices. The City Council has received, reviewed, considered, and relied on the information contained in the Final EIR, as well as information provided at hearings and submissions of testimony from official participating agencies, the public, and other agencies and organizations.

Section 15091 of the State CEQA Guidelines (14 California Code of Regulations [CCR]) and Section 21081 of the Public Resources Code require a lead agency to adopt findings for each significant environmental impact disclosed in an EIR. Specifically, for each significant impact, the lead agency must find that:

- Changes or alterations have been required in, or incorporated into, the project to avoid or substantially lessen the significant environmental effects identified in the Final EIR;
- Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by that agency; or
- Specific economic, social, legal, technological, or other considerations, including provision of employment opportunities for highly trained workers, make the mitigation measures or project alternatives identified in the Final EIR infeasible.

The California Code of Regulations, Title 14, Section 15091(b) requires that the City’s findings be supported by substantial evidence in the record. Accordingly, the Lead Agency’s record consists of the following, which are located at the City’s Community Development Department office, Paso Robles, California:

- Documentary and oral evidence, testimony and staff comments and responses received and reviewed by the Lead Agency during public review and the public hearings on the Beechwood Specific Plan Project.
- The City of Paso Robles Beechwood Specific Plan Project Final Environmental Impact Report (July 2020).

In addition to making a finding for each significant impact, if the lead agency approves a project without mitigating all of the significant impacts, it must prepare a statement of overriding considerations, in which it balances the benefits of the project against the unavoidable environmental risks. The statement of overriding considerations must explain the social, economic, or other reasons for approving the project despite its environmental impacts (14 CCR 15093, Pub. Res. Code 21081).

This document contains the findings and statement of overriding considerations for the approval of the Beechwood Specific Plan and reflects the City’s independent judgment (refer to Section 10). This document incorporates by reference the Final EIR. The EIR, Beechwood Specific Plan, and other portions of the administrative record are available for review at:

City of Paso Robles
Community Development Department
1000 Spring Street
Paso Robles, CA 93446
Contact: Darren Nash
(805) 237-3970
Having received, reviewed and considered the foregoing information, as well as any and all information in the record, the City Council of the City of Paso Robles hereby makes these Findings pursuant to, and in accordance with, Section 21081 of the Public Resources Code.
SECTION 2. PROJECT DESCRIPTION

A. PROJECT OBJECTIVES

Project Objectives constitute a statement of objectives sought by the proponents of the proposed project. The vision of the Beechwood Specific Plan is to establish a master planned neighborhood that features parks, multi-use pathways, and a variety of housing types and that celebrates the City’s heritage through preserving and replanting oak trees native to El Paso de Robles (Pass of the Oaks). The Project has been designed to meet the needs of City’s growing population by providing a mix of residential densities, diverse residential product types, and smaller scale commercial uses with an emphasis on open space trails, on- and off- street bicycle paths, and both active and passive recreation including development of an eight-acre community park. The Specific Plan is more detailed than the General Plan but less precise than subdivision maps or construction plans. The overall objective of the project is to adopt a specific plan for the Beechwood project site, pursuant to the City General Plan. The City’s objectives for the Beechwood Specific Plan include:

1. Help meet regional and local workforce housing needs by providing a mix of land uses and housing types for a range of income levels. This Objective includes the following components: High quality housing at diverse price points; small and large single family residences; attached for rent and ownership units; clustering density in areas with limited constraints.

2. Create healthy neighborhoods by providing recreational opportunities and safe walking and biking facilities connected with the rest of the City. This Objective includes the following components: Neighborhoods connected by multi-use trail system and bike lanes; amenitized green spaces provide areas for active and passive recreation; new community park offering new recreational facilities and new opportunities for youth and adult sports programs.

3. Provide a safe and interconnected circulation network for all modes and abilities. This Objective includes the following components: Connecting the Specific Plan area to the adjacent, larger capacity streets and design multiple points of access to these streets from onsite streets to minimize the concentration of vehicles at intersections; traffic calming measures provided to reduce vehicle speeds; bike lanes to help ensure safety of cyclists; detached multi-purpose pathway system provides safe separation between vehicles and pedestrians.

4. Protect native oak trees and riparian areas for future generations. This Objective includes the following components: Preserve the Project’s most sensitive resources in open space; create new natural habitat through creative use, placement, and integration of required stormwater features; careful site planning to minimize impacts to oak trees and to minimize landform alteration; stormwater capture provides new opportunities for groundwater recharge; implement low water use landscaping and water fixtures in compliance with the City’s water conservation ordinances.

5. Provide certainty that phasing, financing, and maintenance of Plan Area infrastructure and services proceed in a manner that serves the interests of the community. This Objective includes the following components: Supply all new development that occurs within the Specific Plan area with adequate volumes of potable water by a City operated and maintained system; connect all development with the Specific Plan area to a City operated and maintained wastewater system that has adequate capacity to handle the proposed flows; provide stormwater management strategies that provide opportunities for groundwater recharge; reduce runoff and improve water quality by incorporating innovative storm water management process; ensure existing utility purveyors have adequate infrastructure to accommodate the demand from the Specific Plan area, including solid waste, recycling, electrical, natural gas, cable, telephone, and telecommunications; provide new public services infrastructure that adequately serves the new
development as well as any required off-site improvements necessary to meet the demand generated by the buildout of the Project; ensure schools and emergency services are adequate to meet the demands of the Project.

6. Provide a master planned residential community that exhibits high-quality architecture and incorporates local sustainable landscaping.

B. PROPOSED PROJECT

The Beechwood Specific Plan is a master-planned community proposing a mix of land uses including detached single-family and attached multi-family residential, commercial mixed use, park, drainage and stormwater quality improvements, and open space uses. In order to provide a variety of both for-sale and rental housing types, a minimum of 100 dwelling units are planned at 20-Du/ac (High Density Residential), and a minimum of 50 units are planned at 8-du/ac (Medium Density Residential). The balance of the proposed density ranges from 3.3 Du/Ac to 15 Du/Ac. The maximum number of dwelling units allowed within the BSP is 911.

The Beechwood Specific Plan will designate approximately 7 percent, or about 28.4 acres, of the Specific Plan area for recreational and open space uses, including a 8.1-acre community park for residents of the City, landscape amenities, play areas, and a network of trails and multi-modal paths, consistent with Parks and Recreation Element Policy PR-1A.

The proposed street network within the Specific Plan area consists primarily of collector and local streets.

These project elements are further described in the EIR, specifically Section I, Project Summary. The Beechwood Specific Plan is included in the EIR as Appendix F.
SECTION 3. ENVIRONMENTAL IMPACT REPORT

A. BACKGROUND

The Final EIR was prepared in compliance with CEQA and State CEQA Guidelines. In accordance with Section 15121 of the State CEQA Guidelines, the purpose of this Final EIR is to serve as an informational document for the public and City of Paso Robles decision makers. Although the project is a specific plan and development plan, The Final EIR contains a project-level environmental review that fulfills the requirement of a project-level EIR. As defined in CEQA Guidelines Section 15161, a project-level EIR:

...examines the environmental impacts of a specific development project. This type of EIR should focus primarily on the changes in the environment that would result from the development project. The EIR shall examine all phases of the project including planning, construction, and operation.

Pursuant to CEQA Guidelines Section 15182, where a public agency has prepared an EIR on a specific plan after January 1, 1980, no EIR or negative declaration need be prepared for a residential project undertaken pursuant to and in conformity to that specific plan, as long as the residential project is within the scope of the EIR, no new environmental effects are anticipated to occur, and no new mitigation measures are required for the residential project.

The City distributed a Notice of Preparation (NOP) of the EIR for a 30-day agency and public scoping period starting on June 28, 2018 and ending on July 27, 2018. In addition, the City held an EIR Scoping Meeting on April 11, 2018 at Paso Robles City Hall. In accordance with Section 15087 of the State CEQA Guidelines, the Draft EIR was circulated for a 45-day public review period that began March 11, 2020 and concluded on April 24, 2020.

Responses to each written and verbal comment that the City received are included in the Responses to Comments section of the Final EIR. The Draft EIR and Responses to Comments collectively comprise the Final EIR for the project.

B. IMPACT ANALYSIS

Three categories of impacts are identified in the Environmental Impact Report:

Class I

Class I impacts are significant and unavoidable. To approve a project resulting in Class I impacts, the CEQA Guidelines require decision makers to make findings of overriding consideration that “specific legal, technological, economic, social, or other considerations make infeasible the mitigation measures or alternatives identified in the EIR.”

Class II

Class II impacts are significant but can be mitigated to a level of insignificance by measures identified in the Final EIR. When approving a project with Class II impacts, the decision makers must make findings that changes or alternatives to the project have been incorporated that reduce the impacts to a less than significant level.

Class III

Class III impacts are adverse but not significant.
SECTION 4. FINDINGS FOR LESS THAN SIGNIFICANT ENVIRONMENTAL EFFECTS OF THE PROJECT

The findings below are for Class III impacts. Class III impacts are adverse but not significant.

The City determined, based upon the threshold criteria for significance, the environmental analysis presented in the Final EIR, and the comments received by the public on the Draft EIR, no substantial evidence was submitted to or identified by the City which indicated that the project would have a significant impact on the following environmental areas:

A. AESTHETICS

1. Impact AES-1: The specific plan area is designated by the Paso Robles General Plan for specific plan implementation and associated residential development. The project would be required to comply with the City’s Oak Tree Preservation ordinance (Municipal Code Chapter 10.01), which requires permits describing specific trees to be removed, justifying their removal, and relocating or replacing trees in kind. The Specific Plan includes approximately 54 acres of public and private open space/recreational uses, accounting for approximately 23 percent of the Specific Plan area, which would somewhat preserve natural landscapes and open space viewsheds in these areas. The Beechwood Specific Plan area has been anticipated for urban development since 2004, including residential, business park, and commercials uses, since the preparation of the General Plan. Although urban development of the Specific Plan area would eliminate views of oak covered hillsides from public viewsheds in the Specific Plan area vicinity, the Specific Plan area is designated by the city for residential and commercial development. Furthermore, the Specific Plan has been designed to minimize impacts to oak woodlands and riparian corridors though sensitive street and lot design. Therefore, the project would not result in unanticipated changes to public views or adverse effects on scenic vistas in the area, nor would development of the specific plan area substantially damage scenic resources. This impact would be less than significant (Class III). (Draft EIR, p. IV.F-10 to IV.F-11.)

B. AIR QUALITY AND GREENHOUSE GAS EMISSIONS

1. Impact AQ-6: The project would not result in objectionable odors that would affect a substantial number of people. The project includes residential and non-residential development, mixed use development, a community park, and open space land uses. None of these uses are identified by SLOAPCD as uses that typically create objectionable odors. This impact would be less than significant (Class III). (Draft EIR, p. IV.I-47.)

2. Impact GHG-1: Project construction and operation would generate temporary and long-term increases in GHG emissions. Project construction would emit approximately 694.13 MT CO2e over the 21-month construction period, or approximately 23.14 MT CO2e per year when amortized over a 30-year period (the assumed minimum project lifetime). New development facilitated by the Specific Plan would generate long-term GHG emissions from new vehicle trips (mobile emissions), combustion of natural gas and use of electricity (energy emissions), solid waste disposal, water use, and consumer products, architectural coatings, and landscaping equipment (area emissions). Combined annual GHG emissions would be approximately 3.3 MT CO2e per service person per year buildout year 2030. The project has been designed with a mix of land uses, including single- and multi-family residential, commercial, and recreational land uses. The project’s low annual per-service person emissions, in comparison to similarly-sized projects that do not include a mix of land uses, result from the high service population associated with the mix of land uses included in the Specific Plan, as well as the use of locally-developed vehicle trip rates for residential land uses from the city’s Travel Demand Forecasting Model. The project’s annual per-service person emissions would not
exceed the locally-appropriate, project-specific thresholds of 3.3 MT CO2e per service person per year for year 2030. Therefore, these emissions would not result in a potentially significant contribution to climate change. This impact would be less than significant (Class III). (Draft EIR, p. IV.I-47 to IV.I-49.)

C. ENERGY

1. Impact E-1: Project construction and operation would require temporary and long-term consumption of energy resources. Energy use during construction activities would be temporary in nature, and construction equipment used would be typical of similar-sized construction projects in the region. Overall, construction activities would utilize fuel-efficient equipment consistent with state and federal regulations and would comply with state measures to reduce the inefficient, wasteful, or unnecessary consumption of energy. Construction contractors would not be anticipated to utilize fuel in a manner that is wasteful or unnecessary as a business practice to ensure cost efficiency. Moreover, the use of energy to construct new development in the Specific Plan area would not be unnecessary because a primary objective of the project is to meet existing housing demands. Energy demand from operation of development facilitated by the proposed Specific Plan would include fuel consumed by passenger vehicles; natural gas consumed for heating and cooking in residential and non-residential buildings; and electricity consumed by residential and nonresidential buildings including, but not limited to lighting, water conveyance, and air conditioning. The proposed Specific Plan has been designed with a mix of land uses, including single- and multi-family residential, commercial, recreational, and public land uses. The Specific Plan also includes pedestrian and bicycle paths, including multi-modal boulevards separated by landscaped medians and multi-modal paths that would connect throughout the Specific Plan area, providing pedestrians and bicyclists with off-street circulation options. Portions of the Specific Plan area are within 0.40 mile of bus stops for the San Luis Obispo County Regional Transit Authority Paso Express Routes A and B (Stoney Creek at Creston stop). The proposed bicycle and pedestrian facilities and availability of public transit as an alternative to single-occupancy vehicles would encourage the use of alternative transportation modes, which would reduce VMT and associated fuel consumption. In addition, vehicles driven by future residents, employees, visitors, and patrons of Specific Plan area developments would be subject to increasingly stringent federal and state fuel efficiency standards, minimizing the potential for the inefficient consumption of vehicle fuels. As a result, vehicle fuel consumption resulting from the project would not be wasteful, inefficient, or unnecessary. Construction of the proposed residential and non-residential buildings would comply with the 2019 California Building Energy Efficiency Standards for Residential and Non-residential Buildings and CALGreen (California Code of Regulations Title 24, Parts 6 and 11) or later versions, which are anticipated to be more stringent than the 2019 codes. The 2019 standards require the provision of electric vehicle supply equipment, water-efficient plumbing fixtures and fittings, recycling services, solar on low-rise residential development, solar-readiness on commercial development, and other energy-efficient measures that would reduce the potential for the inefficient use of energy. The 2019 Building Energy Efficiency Standards require installation of solar photovoltaic systems for single-family homes and multi-family buildings of three stories and less, which would supply much of the on-site electricity demand. The proposed Specific Plan includes several goals and guidelines to support outdoor water conservation, including the use of stormwater infiltration, drought-tolerant landscaping, and water-efficient irrigation systems, which would help minimize the occurrence of inefficient, wasteful, and unnecessary energy consumption for the treatment and supply of water. The project also includes guidelines to encourage planting deciduous trees next to buildings and along streets to reduce ambient temperature, reduce heat gain, and allow for cool, natural ventilation, which would reduce energy needed for cooling during the warm summer months. As a result, energy consumption resulting from the project’s built environment would not be wasteful, inefficient, or unnecessary, and this impact would be less than significant. This impact would be less than significant (Class III). (Draft EIR, p. IV.O-10 to IV.O-12.)
D. GEOLOGY AND SOILS

1. Impact GEO-1: No active faults that could result in rupture of the ground surface have been mapped across the BSP planning area. The closest known potentially active fault is the Rinconada Fault, located approximately 2.7 miles southwest of the project site. However, the project site may be subject to strong ground shaking, which could cause fill material to settle; destabilize slopes; and damage structures, property, utilities, road access, and people. Soil explorations conducted as part of the Geotechnical Report found the likelihood of liquefaction at the site very low due to the presence of hard sandy material at a depth of about 2 to 4 feet and the absence of groundwater to a depth of 15 feet below existing grade. The project would be required to comply with CBC seismic requirements to address potential seismic-related ground failure including lateral spread. Based on USGS data, the project is not located in an area of historical or current land subsidence (USGS 2019). Based on the City’s Safety Element Liquefaction Risk Map, the project site is located in an area with moderate potential for liquefaction risk. Therefore, impacts related to on- or off-site landslides, lateral spreading, subsidence, liquefaction or collapse would be less than significant. Compliance with local, state, and federal regulations would ensure impacts related to ground shaking remain Less than Significant (Class III). (Draft EIR, p. IV.A-14 to IV.A-15.)

2. Cumulative Geology and Soils Impacts: Planned, proposed, and approved projects in and around the city would expose additional people and property to seismic and geologic hazards that are present in the region. The magnitude of geologic hazards for individual projects would depend upon the location, type, and size of development and the specific hazards associated with individual sites. Specific geologic hazards associated with individual project sites would generally be limited to those sites without affecting other areas. Similarly, potential impacts to paleontological resources associated with each individual site would be limited to that site without affecting other areas and impacts to these resources would be mitigated on a case-by-case basis. Compliance with existing regulations, including CBC requirements, city-issued permit requirements, and Construction General Permit requirements, would minimize potential cumulative seismic and geologic impacts. Seismic and geologic hazards would be addressed on a case-by-case basis and would not result in cumulatively considerable impacts. Cumulative geologic hazard impacts would be less than significant, and the project’s contribution would not be cumulatively considerable. (Draft EIR, p. IV.A-19.)

E. HAZARDS AND HAZARDOUS MATERIALS

1. Impact HAZ-1: Construction and operation of the proposed residential and commercial uses could result in the accidental release of hazardous materials. The transport, use, handling, and disposal of hazardous materials during construction would be pursuant to local, state, and federal regulations to minimize risk and exposure. Operation of the proposed project would not require routine transport, use, or disposal of hazardous materials. The project would include residential and commercial uses. These uses typically do not use or store large quantities of hazardous materials. Any hazardous substances associated with the project would continue to be transported, stored, and used according to regulatory requirements and existing procedures for the handling of hazardous materials; therefore, impacts would be less than significant. In addition, the project site is not located near or adjacent to Highways 101 and 46 East and West, or the Union Pacific Railroad, which are listed as areas of main concern for transport of hazardous materials in the LHMP. Thus, compliance with applicable regulations related to the handling, transport, and storage of hazardous materials would minimize the risk of potential exposure to these substances, resulting in a less than significant impact (Class III). (Draft EIR, p. IV.J-13.)

2. Impact HAZ-2: Small quantities of hazardous materials may be used in conjunction with the proposed residential and commercial uses on site. These materials would typically be limited in type and quantity such that they would not create a hazard to the public or environment. The proposed
Commercial Mixed-Use district would prohibit service stations and certain manufacturing and production facilities and therefore no exposure of residential uses to gasoline and diesel fuel would occur. This impact would be less than significant (Class III). (Draft EIR, p. IV.J-14.)

3. **Impact HAZ-3:** The Virginia Peterson Elementary School is located approximately 40 feet west of the project site. Compliance with existing federal, state, and local regulations would ensure that hazardous materials impacts to schools would remain less than significant (Class III). In addition to being subject to federal, state, and local regulations for the transport of hazardous materials, the City requires the preparation of a Traffic Control Plan for any construction work that may impact traffic, pedestrian and bicycle facilities. Mitigation Measure TR-1, Traffic Control Plan would include detour routes for vehicles, bicyclists, and pedestrians, and would further reduce potential impacts related to transportation of hazardous materials in the vicinity of Virginia Peterson Elementary School. Under project operation, residential and non-residential uses may involve the routine use and storage of some materials that are considered hazardous. However, project operation does not include industrial uses or uses that would result in a release of hazardous materials. The Commercial Mixed-Use specific plan area is approximately 0.45 mile southeast of the school. Therefore, no operational impacts from hazardous materials to schools would occur. (Draft EIR, p. IV.J-14 to IV.J-15.)

4. **Impact HAZ-5:** Asbestos-Containing Material and Lead Based Paint (LBP) may be present in existing on-site structures. Demolition of these structures would be required to comply with applicable state and local policies and regulations for the control and remediation of hazardous materials to prevent human exposure. Therefore, this impact would be less than significant (Class III). (Draft EIR, p. IV.J-17.)

5. **Impact HAZ-6:** Development would not interfere with any emergency evacuation routes in the event of a disaster. Neither the City nor the County have adopted emergency response or evacuation plans. The project would include residential and commercial development and associated roadway improvements. During construction, road closures and realignment of the roads may result in increased congestion in the event of an emergency. However, due to the proximity of alternate routes within the vicinity of the project site, construction-related impacts would be less than significant. The project would not have a significant effect on emergency response or evacuation. In addition, the project would be required to comply with Paso Robles Fire Department specifications and the California Fire Code, which would ensure that the project does not interfere with emergency response or evacuation procedures. Therefore, impacts would be less than significant (Class III). (Draft EIR, p. IV.J-17.)

6. **Impact HAZ-7:** The project would be located within and adjacent to identified moderate to high fire hazard areas designated by CAL FIRE. There are no identified State Responsibility Areas or very high fire hazard severity zones within incorporated areas of Paso Robles (CAL FIRE 2007). According to City of Paso Robles LHMP, the majority of the project site is considered to have a high fire hazard (City of Paso Robles 2016). The Specific Plan area is identified on the City’s Fire Severity Zones Local & State Responsibility Areas map (General Plan Safety Element Figure S-8) as being within a moderate-to-high Fire Hazard Severity Zone in a Local Responsibility Area (LRA), and adjacent to a high Fire Hazard Severity Zone in a State Responsibility Area on the southern and eastern borders. New residential and commercial uses, associated infrastructure installation and maintenance, and additional human activity adjacent to this designated high fire hazard area would create additional sources and increased risk of fires in the Specific Plan area vicinity. The Paso Robles Fire Department’s average response time standard of 4 minutes for 90% of the calls is not currently being met and a new fire station facility is currently planned. Standard Fire Department requirements such as road naming requirements, address number standards, hydrant requirements, and review of Specific Plan area circulation would apply to the project and would reduce the risk to people and structures from wildland fires. The Specific Plan area would be completely developed with residential housing and infrastructure, thus significantly reducing the fire hazard risk.
Development in the Specific Plan area would be required to comply with the California Fire Code, which provides uniform fire prevention, hazardous material, and building construction regulations. Specifically, new development in the Specific Plan area would be required to adhere to applicable 2016 CBC Chapter 7A Partial Requirements, which requires certain construction materials and methods to minimize wildfire exposure hazards in High Hazard Severity Zones. These include Class A fire rated roof assemblies, flame and ember intrusion resistant vents, and non-combustible building side materials. In addition, new development in the Specific Plan area would be required to comply with the city’s Hazard Impact Mitigation Plan and Building Code requirements. Compliance with these existing regulations would ensure that impacts related to wildfires and wildland fire hazards remain less than significant. The project is at a wildland-urban interface. To help with prevention and damage from wildfire, the project, in consultation with CAL FIRE and the City Fire Department through the CEQA process, would provide fuel modification zones where appropriate, insure that emergency fire flow is available project-wide, pursue and maintain weed and brush abatement as directed by the fire department, plant fire resistance landscaping where appropriate and follow existing building codes for fire resistant construction. Thus, compliance with existing regulations pertaining to fire management would ensure potential impacts associated with wildland fire hazards would remain less than significant (Class III). (Draft EIR, p. IV.J-18 to IV.J-19.)

7. Cumulative Hazards and Hazardous Materials Impacts: Planned buildout of the city of Paso Robles under the General Plan, would cumulatively increase the potential for exposure of people to hazards and hazardous materials, including soil contamination, pesticides, LBP, asbestos, and upset risks along major transportation routes. The project would incrementally contribute to this cumulative effect. However, such risks of exposure are reduced through adherence to existing federal, state, and local regulations. USEPA and USDOT laws regulate the safe interstate transportation of hazardous materials and waste. In addition, cumulative development within the city, particularly on the urban boundary, would create additional sources and increased risk of wildland fires in medium and high fire hazard areas. However, as with the proposed project, future development would be required to comply with the California Fire Code and the 2016 CBC Chapter 7A Partial Requirements, as well as applicable city requirements.

Impacts associated with hazards and hazardous materials are generally site-specific. Accordingly, as required under applicable laws and regulations, potential impacts associated with cumulative developments would be addressed on a case-by-case basis and appropriate mitigation would be designed to mitigate impacts resulting from individual projects, depending upon the type and severity of hazards present. Enforcement of federal, state, and local laws and regulations would ensure that hazards to the public or environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment would remain less than significant. In addition, adherence to applicable General Plan policies and applicable state and federal regulatory requirements would reduce any cumulative hazards and hazardous materials impacts resulting from buildout of the city under the General Plan, including buildout of the Beechwood Specific Plan, to a less-than-significant level. Therefore, cumulative impacts related to hazards and hazardous materials would be less than significant. (Draft EIR, p. IV.J-19.)

F. HYDROLOGY AND WATER QUALITY

1. Water Quality Standards and Requirements and Site Drainage: Implementation of the project would not violate water quality standards or waste discharge requirements because the project has been designed to meet the requirements for water quality under the Federal Clean Water Act and the SWRCB’s Phase II Municipal Stormwater Program. Buildout of the BSP would be subject to NPDES permit requirements for discharges associated with construction...
activities, including preparation and implementation of stormwater pollution prevention plans (SWPPPs) for construction.

The site’s rolling topography requires that the project be integrated into the natural landform to control stormwater runoff over the long term. The majority of the lots will be graded to provide building pads that will accommodate concrete slab foundations. The new lots will generally step up or down from one another from one to three feet along the street frontage. The BSP will involve stormwater system of collection, stormwater treatment, and detention facilities that will address stormwater requirements. The project area has been divided into 33 drainage management areas, each with one or more water quality and drainage control features. These features may include channel restoration, linear bioretention, residential bioretention, regional bioretention basins, bioretention bulb-outs, street bioretention planters, street bioretention, residential bioretention planters, and bioretention adjacent to a natural channel. One specialized component of this integrated system will be application of measures implemented to protect and enhance the existing and new wetland features within the project site. Specifically, a wetland mitigation program is proposed to expand the existing wetland along creston road at its intersection with beechwood drive. This low-lying area has the ready-made qualities for expansion of wetland vegetation and for replacement of some of the existing wetlands that would be impacted during construction. An additional wetland area would also be created to mitigate for the re-alignment of approximately 1,000 feet of channel drainage and associated wetland within the project site’s interior drainage as well.

The project would design all of the elements of the system in compliance with city and SWRCB policies to ensure that the project would not result in a net increase in runoff flowrate and to ensure that stormwater runoff will be treated as required. As a result, the project’s impacts on water quality and drainage would be less than significant. (Draft EIR, p. IV.D-7, Final EIR, p. IV.D-7.)

2. **Inundation from Flood, Tsunami or Seiche:** The Project site is not located within a 100-year flood hazard area nor a dam inundation area (FEMA 2019). Two dams with extremely high inundation hazard ratings, San Antonio and Nacimiento Dams, are located to the northwest of Paso Robles; however, their respective inundation areas do not reach the Project site (DWR 2019). Therefore, rupture of these dams (i.e., in the event of an earthquake, seiche, or catastrophic failure during a rain event) would not result in inundation of the Project area. Therefore, impacts on safety as a result of a seiche on these water bodies. (Draft EIR, p. IV.D-7.)

**G. LAND USE/PLANNING**

1. **IMPACT LU-1: THE PROJECT WOULD FACILITATE DEVELOPMENT OF A LARGE, PRIMARILY UNDEVELOPED AREA IN THE CITY, AND WOULD EXTEND CIRCULATION ROUTES THROUGH THE SOUTHEASTERN PORTION OF THE CITY. ACCESS TO THE BSP AREA WOULD BE PROVIDED VIA TWO ROADWAY CONNECTIONS TO CRESTON ROAD, FOUR ROADWAY CONNECTIONS TO BEECHWOOD DRIVE, AND FIVE ROADWAY CONNECTIONS VIA MEADOWLARK**
ROAD. A PROPOSED TRAIL NETWORK WOULD BE INCORPORATED INTO THE DESIGN AND WOULD INCLUDE TRAILS AROUND MUCH OF THE PERIMETER OF THE DEVELOPMENT AS WELL SEVERAL TRAILS WITHIN THE PLAN AREA, TOTALING APPROXIMATELY 2.9 MILES. CLASS II BIKE PATHS WOULD BE INSTALLED ON CRESTON ROAD, MEADOWLARK ROAD, AND INTERNAL ROADWAYS WITHIN THE PLAN AREA. SIDEWALKS WOULD BE INSTALLED ON BOTH SIDES OF ALL NEW STREETS WITHIN THE DEVELOPMENT.

IMPLEMENTATION OF THE BSP WOULD NOT CREATE BARRIERS TO TRAVEL WITHIN OR AROUND THE PLAN AREA. WHILE THE PROJECT WOULD REMOVE AN EXISTING ROADWAY INTO THE PLAN AREA (CATTLEMAN WAY), SEVERAL NEW MEANS OF ACCESS, INCLUDING NEW ROADWAYS, TRAILS, AND SIDEWALKS, WOULD BE CONSTRUCTED. THE PROJECT WOULD NOT DIVIDE AN ESTABLISHED COMMUNITY, AND THIS IMPACT WOULD BE LESS THAN SIGNIFICANT (CLASS III). (DRAFT EIR, P. IV.L-9 TO IV.L-10.)

H. NOISE

1. Impact N-1: Long-term traffic generated by BSP planning area development would increase local traffic noise levels. Increases in near-term traffic noise levels along area roadways attributable to the project would range from approximately 0.2 to 2.8 dBA CNEL/Ldn. The highest increases in predicted near-term traffic noise levels would occur along roadways located nearest the project site, including nearby segments of Creston Road, Charolais Road, Meadowlark Road, and Beechwood Drive. However, the proposed project would not result in a significant increase (i.e., 3 dBA, or greater) in near-term traffic noise levels at noise-sensitive land uses located along area roadways. As a result, this impact would be less than significant. Increases in cumulative traffic noise levels along area roadways attributable to the project would range from approximately 0.3 to 2.9 dBA CNEL/Ldn. The highest increases in predicted future cumulative traffic noise levels would occur along nearby segments of Creston Road, Golden Hill Road, Barley Grain Road, and Beechwood Drive. The proposed Project would not result in a significant increase (i.e., 3 dBA, or greater) in future cumulative traffic noise levels along area roadways. As a result, this impact would be less than significant. The anticipated increase in local traffic noise under near-term and cumulative conditions would be less than significant (Class III). (Draft EIR, p. IV.H-13 to IV.H-15.)

2. Impact N-4: The project would result in groundborne vibration in the BSP planning area vicinity, primarily during the construction phase. Ground vibration generated by construction equipment would not exceed approximately 0.09 inches per second ppv at 25 feet. Predicted vibration levels at the nearest offsite structures, which are located in excess of 25 feet from the project site, would not exceed commonly recommended criteria for structural damage and human annoyance (i.e., 0.2 in/sec ppv). In addition, haul trucks traveling along project area roadways may result in perceptible increases in vibration levels. However, these vibration levels would be transient and instantaneous events, which would be typical of existing vibrations along the roadway network. Based on measurements conducted by Caltrans, on-road heavy-duty trucks would not generate substantial increases in groundborne vibration that would be expected to exceed commonly applied criteria for structural damage or annoyance (Caltrans 2013). As a result, this impact would be considered less than significant. This impact would be less than significant (Class III). (Draft EIR, p. IV.H-20 to IV.H-21.)

I. POPULATION/HOUSING

1. Impact PH-1: The project would not result in growth in the planning area that is substantially greater than projected in the SLOCOG regional growth forecast or City’s General Plan. When added to the existing population within the city of approximately 31,559 (DOF 2018), buildout of the Specific...
Plan Area would increase the city’s total population to an estimated 34,026 residents, an increase of 7.8 percent. The population projections in the city’s General Plan Land Use Element account for development of the BSP planning area, and the potential impacts the population projections for Paso Robles have been addressed in the General Plan Update EIR. The General Plan development potential described in Policy LU-1A describes a maximum development potential of 16,818 residential dwelling units in the city. Further, the maximum buildout of the BSP planning area under the current General Plan land use designations is 674, as prescribed by Policy LU-G of the city’s General Plan. The BSP and associated general plan amendment to update the land use designations and Specific Plan Overlay would allow a maximum density of 911 dwelling units in the BSP planning area. Thus, the increase in the city’s population and residential dwelling units resulting from the project would be consistent with the population projections expected under the General Plan. Furthermore, SLOCOG projects that the city will grow by approximately 6,299 new residents and 2,916 housing units by the year 2050. Although the project would result in the generation of new employees, these employees would likely come from the existing population in the city and would not contribute to new population growth. This impact would be less than significant (Class III). (Draft EIR, p. IV.N-6 to IV.N-7.)

2. Impact PH-2: Implementation of the project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. Implementation of the BSP would result in the displacement of four existing rural residential units. However, the addition of 911 residential units would replace any displaced residences. Impacts would be less than significant (Class III). (Draft EIR, p. IV.N-7 to IV.N-8.)

3. Cumulative Population and Housing Impacts: Implementation of the Specific Plan would displace two existing rural residential units on the project site and two existing rural residential units would remain. The addition of 909 residential units would replace any displaced residences. In addition, the installation of new infrastructure in the BSP planning area and the eastern portion of Paso Robles has the potential to facilitate development of rural lands outside of the city. Cumulative buildout in the City could result in up to 2,413 new dwelling units, which would add approximately 6,563 new residents to the City’s population. The General Plan development potential described in Policy LU-1A describes a maximum development potential of 16,818 residential dwelling units in the city. Growth facilitated by the Specific Plan (in addition to the cumulative development of housing within the city) would occur within the bounds of the city’s planning area and would be consistent with the General Plan projections for the city. Therefore, the project would not contribute to a significant cumulative impact related to displacement in the greater cumulative impact analysis area (San Luis Obispo County) and would not result in significant cumulative population growth impacts beyond the planning area and the incremental population impacts of the proposed BSP would not be cumulatively considerable. (Draft EIR, p. IV.N-8.)

J. PUBLIC SERVICES

1. Impact PS-1: The Specific Plan would increase the demand for fire protection services, such that new or expanded facilities would be needed to meet the City’s standard response time and level of service standard. New water systems for proposed development in the Specific Plan area are required by the city to be designed to provide adequate fire flows. The project would be also required to pay the CFD Special Tax at a rate determined by the city’s Fiscal Impact Report to offset its contribution to this impact by providing funding for additional firefighters, equipment, and a new fire station facility to serve the city. Therefore, impacts to public services related to fire flows would be less than significant. The proposed new fire station facility would be subject to city review, including CEQA environmental analysis for any discretionary approvals. Environmental analysis would identify mitigation measures required to avoid, minimize, or reduce any identified environmental effects. The types of impacts that could be identified include effects related to encountering hazardous materials,
cultural resources, or biological resources on the site during project construction. During operation of the fire station facility, potential environmental effects could include changing traffic pattern and intermittent noise from emergency sirens. While a project-level analysis of the planned fire station facility would be speculative at this time due to uncertainty regarding project timing, design, and final precise location, the types of impacts associated with such a facility would typically be less than significant or mitigated to a less than significant level. With the payment of the required CFD Special Tax and the requirement for project specific environmental review for the planned fire station facility, the project’s potential environmental impacts would be less than significant (Class III). (Draft EIR, p. IV.M-10 to IV.M-11.)

2. Impact PS-2: The Specific Plan would not impact police services such that new or expanded facilities would be required. Project development would be required to pay the CFD Special Tax at a rate determined by the city’s Fiscal Impact Report, which funds additional staff and facilities as needed. This would offset the increased demand for police services by providing funding for additional police officers to serve the area. Impacts to police protection services would be less then significant (Class III). (Draft EIR, p. IV.M-11 to IV.M-12.)

3. Impact PS-3: Development facilitated by the specific plan would increase the demand for schools such that new facilities and staff would be required to provide additional student capacity. Based on the District’s district-wide enrollment projects, a new school will be required within 5 to 8 years to meet projected City population increases. The likely location of that school from a population and operation standpoint has been identified by the District as in the southeast quadrant of the City such as within the Olsen Specific Plan property. Although environmental impacts arising from the construction of a new school are foreseeable, the specific nature and magnitude of the impacts is to a large degree speculative because no physical site has been identified. Through the required payment of state-mandated impact mitigation fees, potential impacts to public schools would be less than significant (Class III). (Draft EIR, P. IV.M-12.)

4. Impact PS-4: The Specific Plan would increase demand for parks. The proposed Project could introduce up to approximately 2,423 new residents in the planning area at buildout. Using the current 7-acre per 1,000 in population standard, the projected population would require about 17 acres of parkland. The Plan includes 8.1 acres (gross) of community park land in addition to 10.1 acres of recreational paths and trails associated with the open space in the planning area and along transportation corridors. Impacts to parks would be less than significant (Class III). (Draft EIR, p. IV.M-13.)

5. Impact PS-5: The Specific Plan would increase demand for library services. The existing facility is approximately 18,678 square feet, leaving a current surplus of 2,899 square feet. 1,239 square feet of library space would be needed to meet the needs of the additional population. Thus, the existing facility is considered to be adequate to serve the needs of either Specific Plan buildout scenario. Through the required payment of the CFD special Tax, potential impacts to library services and facilities would be less than significant (Class III). (Draft EIR, p. IV.M-13.)

6. Impact PS-6: Development of the Specific Plan would increase the amount of solid waste requiring disposal. The Paso Robles Landfill, which would serve the planning area, received a total of 35,274 tons in 2003, according to the SLO County IWMA. Buildout of the Specific Plan would generate an additional 1,521 to 1,978 TPY (an increase of 4.3 to 5.6%), bringing the City total to 36,795 to 37,252 TPY. Since the landfill is at 35% capacity and has room for the Specific Plan waste stream, impacts are considered less than significant (Class III). (Draft EIR, p. IV.M-13.)

7. Impact PS-7: Development accommodated by the Specific Plan would increase demand for power, gas, and communication systems. Increased demand and new development patterns may require upgrades in infrastructure. However, the City is does not anticipate major power supply sources, major gas facilities, or major communication utilities within the planning area that would be directly
impacted by either buildout scenarios under the Specific Plan. Although nearby, the PG&E high-voltage power lines would not be impacted by the proposed Project plan, since it retains the current parcel and easement and buffer for the power lines. Impacts are considered less than significant (Class III). (Draft EIR, p. IV.M-14.)

8. **Cumulative Public Services Impacts (Parks, Solid Waste, Utilities):**

   **Parks.** The proposed Project could introduce up to approximately 2,423 new residents in the planning area at buildout. Using the current 7-acre per 1,000 in population standard, the projected population would require about 17 acres of parkland. The Plan includes 8.1 (gross) of community park land, several recreation centers and usable private open space throughout the Specific Plan area, and 10.1 acres of recreational paths and trails associated with the open space in the planning area and along transportation corridors. Therefore, the plan provides adequate park acreage within the Specific Plan area. Development accommodated by the Specific Plan would place additional demand upon community park facilities that could result in adverse environmental effects at these parks, however the provision of a community park within the specific plan would reduce these effects to less than significant. (Class III) and impacts would not be cumulatively considerable.

   **Solid Waste.** Buildout of the Specific Plan program, in conjunction with other foreseeable development in the City, would increase the amount of solid waste requiring disposal. The General Plan EIR states that adequate landfill capacity exists to meet the needs of future growth. Development under the General Plan would generate an additional 17.1 tons per day, in addition to the current average 200 tons disposed per day. Development accommodated by the Specific Plan would contribute an additional 21 to 23 tons per day, for a total of approximately 221 to 223 tons per day. Existing permitted capacity is 250 tons per day. Thus, buildout of the Specific Plan, in addition to buildout of the General Plan, would still be under the permitted daily disposal rate. Also, considering the current used capacity of the landfill (35%), cumulative impacts are considered less than significant (Class III).

   **Utilities.** The General Plan EIR does not identify any major power, gas, or communications facilities that would be affected by future growth. Buildout of the Specific Plan, in conjunction with growth under the General Plan, would increase demand for such services. However, as no major power, gas, or communications facilities have been identified within the City that would be impacted by cumulative development. Cumulative impacts are considered less than significant (Class III). (Draft EIR, p. IV.M-15 to IV.M-16.)

**K. RECREATION**

1. **Impact REC-1:** The project would accommodate new residents in the City of Paso Robles who would use existing and planned parks and recreation facilities, including new recreation facilities constructed as part of the project. Provision of on-site parks and recreation facilities would meet the adopted City parkland standard for the Specific Plan planning area. The proposed 8.1 acres of community park and 9.6 acres of amenitized green space would provide approximately 7 acres of parkland per 1,000 residents, which meets the city’s adopted performance standard of 7 acres of parkland per 1,000 residents (Policy PR-1A of the Parks and Recreation Element). In addition, the project applicant would be required to pay city parkland development fees (Quimby Act fees) in accordance with the city’s Development Impact Fee program. Parkland development fees are intended to offset increased usage of existing recreational facilities attributed to the project buildout. Proposed development may be eligible for a fee credit at the city’s determination, based on parks provided as part of the proposed project. Therefore, the project would not increase the use of existing neighborhood and regional parks or other recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. Additionally, the project includes new on-site recreational facilities and the potential for adverse
physical effects. Provisions of on-site parks and recreation facilities would meet the adopted City parklands standard for the Specific Plan planning area and would therefore have a less than significant effect on the physical environment. Impacts to parks and recreational facilities would be less than significant (Class III). (Draft EIR, p. IV.P-7.)

2. **Cumulative Recreation Impacts:** The City of Paso Robles has a population of 31,559 (California Department of Finance 2018). Based on the city’s adopted parkland standard, approximately 221 acres of total parkland should be provided in the city. There is currently approximately 105 acres of parkland in the city. This results in approximately 3.3 acres of total parkland per 1,000 residents. Based on existing population and parks acreage conditions, the city is 114 acres of parkland short of meeting its adopted parkland standard (Policy PR-1A of the General Plan Parks and Recreation Element). The project would add 8.1 acres of community parkland in the city. The project would also increase the city’s population by an estimated 2,472 new residents, but overall the project would contribute to the city’s policy goal to achieve the adopted parkland standard on a city-wide basis. Individual projects in the city, including the Beechwood Specific Plan, would be required to pay city parkland development fees in accordance with the city’s Development Impact Fee program. The project would not contribute to cumulative adverse impacts to existing neighborhood and regional parks or other recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. Additionally, the proposed project's new on-site recreational facilities would meet the adopted City parkland standard for the Specific Plan planning area and the potential for adverse physical effects on the environment would be less than significant. (Draft EIR. P. IV.P-8.)

**L. TRANSPORTATION**

1. **Impact TR-5:** Under Existing Plus Project conditions, the project would result in queueing deficiencies at three City-controlled intersections. River Road/Creston Road (#9): the northbound left-turn queue length would further exceed storage length during at least 1 peak hour with the addition of traffic from either project. Additional storage is available in the striped median so queues would not impact other movements, so this impact is less than significant and does not require mitigation. However, the applicant shall coordinate signal timing with the improvements at 13thStreet/Paso Robles Street and 13thStreet/Riverside Avenue to shorten queue lengths at this intersection. Creston Road/Niblick Road (#11): the northbound left-turn queue length would exceed storage length during the AM peak hour due to the addition of traffic from the project. Additional storage is available in the two-way left-turn lane, so this impact is less than significant and does not require mitigation. 1stStreet-Niblick Road/Spring Street (#16): the southbound left-turn queue length would exceed storage length during the PM peak hour due to the addition of traffic from the project. However, additional storage is available in the bay taper, so this impact is less than significant and does not require mitigation. The Project’s Impacts would be Less than Significant (Class III). (Draft EIR, p. IV.G-43.)

2. **Impact TR-9:** SR 46E/Mill Road (#5) would operate at LOS D in the PM peak hour under Near Term conditions. The addition of project traffic increases side street delay by less than 0.3 seconds, and the project does not add traffic to the side street. This is an insignificant impact (Class III). (Draft EIR, p. IV.G-52.)

3. **Impact TR-12:** Under Near Term Plus Project conditions, the project would result in queueing deficiencies at River Road/Creston Road (#9). The northbound left-turn queue length would further exceed storage length during at least 1 peak hour with the addition of traffic from the project. Additional storage is available in the striped median. Coordination with the adjacent 13th Street intersections could also shorten the queue lengths. Additional storage is available in the striped
median so queues would not impact other movements, so this impact is less than significant and does not require mitigation. (Class III). (Draft EIR, p. IV.G-56.)

4. Impact TR-17: Under Cumulative Plus Project Conditions, The addition of project traffic would not further degrade SR 46E/Mill Road (#5) During the am and PM peak hours, or SR 46E/Airport Road (#5) during the AM peak hour. Therefore, no improvements are recommended for those intersections. This is an insignificant impact (Class III). (Draft EIR, p. IV.G-68.)

5. Impact TR-19: South River Road/Riverbank Lane (#18) Would operate at LOS D in the AM and PM peak hours under Cumulative conditions with the Addition of Project Traffic. While the intersection would not meet signal warrants, a two-way left turn lane is proposed for this location to accommodate two stage left turns. This is an insignificant impact with the incorporation of mitigation measure TR-3(b).4 (Class III). (Draft EIR, p. IV.G-69.)

6. Impact TR-22: Under Cumulative Conditions, Creston Road/Golden Hill Road (#10) would result in Queueing Deficiencies in the Eastbound left-turn lane. Traffic from the project would not degrade the intersection operations, so the project’s impacts would be less than significant (Class III). (Draft EIR, p. IV.G-73.)

7. Impact TR-23: Under Cumulative Plus Project Conditions, the project would result in queuing deficiencies at Creston Road/Niblick Road (#11). The left-turn queues could be accommodated in available two-way left-turn lane and bay taper storage. Therefore, the project’s impacts would be less than significant (Class III). (Draft EIR, p. IV.G-73.)

7. Impact TR-26: All project access points would operate acceptably under Cumulative Plus Project conditions with the proposed intersection control, including the intersection of Meadowlark Road/Beechwood Drive. Impacts are less than significant (Class III). (Draft EIR, p. IV.G-78 to IV.G-79.)

8. Impact TR-27: All project access points would operate acceptably under Cumulative Plus Project conditions with the proposed intersection control, including the intersection of Meadowlark Road/Beechwood Drive. Impacts are less than significant (Class III). (Draft EIR, p. IV.G-79 to IV.G-80.)

M. WATER SUPPLY AND WASTEWATER CAPACITY

1. Impact WS-1: Increased population resulting from implementation of the Specific Plan will increase demand on water supply infrastructure. The WSA for the Beechwood Specific Plan concludes the City has adequate potable supply to provide a reliable long-term water supply for the Project under normal and drought conditions. Water supply needed to serve the Project’s residential water demand (248 AFY) is included in the 2015 UWMP and thus no significant impact would result form this demand. Water supply needed to serve the commercial water demand (about 10 AFY) and the non-residential irrigation water demand (about 25 AFY) are not included in the UWMP projections, but the City has the additional 35 AFY of supply available from its water supply portfolio of Nacimiento water, groundwater from the Paso Robles Groundwater Basin and water from the Salinas River, and no significant adverse impact on water supply is identified. The connection points to existing wastewater facilities have been identified in the BSP. Existing lift station #11 shall serve the project during the evaluations of sewer lift stations #11 will occur at the Tentative Tract Map stage. Potential impacts to water distribution system infrastructure from development of the Specific Plan areas were evaluated in the City’s 2014 Water Maser Plan and subsequent analysis to determine new on-site and off-site water system improvements needed to serve the Project. This impact is not considered significant (Class III). (Draft EIR, p. IV.K-11 to IV.K-12, Final EIR, p. IV.K-12.)
2. **Impact WS-2**: Development of the Proposed Project will increase flows to the City Wastewater Plant at a level below permitted dry weather flows. Under the existing zoning of the Beechwood Specific Plan properties, the allowed 674 dwellings would result in a population of 1,792 with a wastewater flow of 0.18 mgd. This amount is already planned for in City wastewater projections and capacity planning (Thompson 2018b). The WWTF is currently operating at about 55% of the allowed dry weather flow. For this reason and because the WWTP is planned to accommodate the development the Beechwood Specific Plan area under existing land use density as well as the “floating” General Plan residential density of which a portion is being applied to the Proposed Project, the net increased in flow of 0.15 mgd from the Project would not exceed the permitted maximum flow and would be a less than significant impact (Class III). (Draft EIR p. IV.K-13.)

3. **Impact WS-3**: Development of the Proposed Project will increase flows to the City sewer collection infrastructure. With the required development of the proposed adequately sized conveyances the potential impact is considered less than significant (Class III). (Draft EIR, p. IV.K-13 to IV.K-14.)

4. **Impact WS-4**: Implementation of the Specific Plan, in conjunction with other foreseeable development in the city limits, would increase the volume and affect the makeup of wastewater requiring treatment. This increment of flow is planned for and within the capacity of the WWTP and would not require any physical upgrades to the facility. Cumulative (short term and build-out) impacts are considered less than significant (Class III). (Draft EIR, p. IV.K-14.)

5. **Impact WS-5**: Implementation of the Specific Plan, in conjunction with other foreseeable development in the current city limits, would increase flows through existing wastewater collection infrastructure. With the improvements outlined in the Integrated Plan being made prior to buildout of the City’s General Plan, cumulative impacts are considered less than significant (Class III). Also, individual projects accommodated by the Specific Plan would be subject to the planned source control/water softener ordinance, thereby alleviating the additional loading burden on the existing plant relative to the increase in wastewater volume. Cumulative impacts are considered less than significant (Class III). (Draft EIR, p. IV.K-14 to IV.K-15.)
SECTION 5. FINDINGS FOR SIGNIFICANT ENVIRONMENTAL EFFECTS OF THE PROJECT THAT HAVE BEEN MITIGATED TO A LESS THAN SIGNIFICANT LEVEL

Class II impacts are significant but can be mitigated to a level of insignificance by measures identified in the EIR. When approving a project with Class II impacts, the decision-makers must make findings that changes or alterations to the project have been incorporated that reduce the impacts to a less than significant level.

This section presents the project’s significant environmental impacts and feasible mitigation measures. Section 15091 of the State CEQA Guidelines (14 California Code of Regulations [CCR]) and Section 21081 of the Public Resources Code require a lead agency to make findings for each significant environmental impact disclosed in an EIR. Specifically, for each significant impact, the lead agency must make the following findings:

1. Changes or alterations have been required in, or incorporated into, the project to avoid or substantially lessen the significant environmental effects identified in the Final EIR;
2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by that agency; or
3. Specific economic, social, legal, technological, or other considerations, including provision of employment opportunities for highly trained workers, make the mitigation measures or project alternatives identified in the Final EIR infeasible.

Each of these findings must be supported by substantial evidence in the administrative record. The City determined and makes the finding, based upon the environmental analysis presented in the Final EIR and the comments received by the public on the Draft EIR, that the following impacts can be fully avoided or reduced to a less-than-significant level through the incorporation of feasible mitigation measures into the project, as identified in the Final EIR. For each of these identified impacts, changes or alterations have been required in, or incorporated into, the project to avoid or substantially lessen the significant environmental effects identified in the Final EIR.

A. AESTHETICS

1. Impact AES-2: Project grading would modify the existing visual form of the specific plan area in a manner that would permanently change topography, land use, and vegetation. The project would change the character of the specific plan area from semi-rural agricultural to urbanized. The project would convert approximately 234 acres of mostly undeveloped open space in the Specific Plan area to urban development, including residential and non-residential land uses, as well as recreational uses and associated infrastructure, including roadways. The Specific Plan includes design principles and architectural guidelines, which require development in the Plan area to incorporate styles typical of the historic architecture in Paso Robles. However, implementation of the project will permanently convert approximately 234 acres in the Specific Plan area from semi-rural agriculture and open space to residential development and urban infrastructure. This change in the visual character of the specific plan area would be significant but mitigable (Class II).

Mitigation: Compliance with Mitigation Measure AES-2 and Mitigation Measure AG-2(a) would minimize potential impacts to the Specific Plan area’s visual character, reducing this impact to a less than significant level (Class II). Mitigation Measure AG-2(a) discussed below requires that agricultural buffer easements, berms, and vegetative screening be implemented on properties in the
Specific Plan area within a minimum of 50 feet of adjacent active agricultural uses. The agricultural buffers and open space would offer a transition from semi-rural to urban visual character.

- **Mitigation Measure AES-2 Master Landscape Plans Requirements.** The Master Landscape Plan shall indicate specific best practices for landscaping in the Specific Plan area, including as landscape buffers between residential and non-residential development and open space areas/parks, plantings that screen outdoor parking areas and residential and non-residential structures, and shielded lighting. The Master Landscape Plan shall be developed in coordination with the requirements in Mitigation Measures BIO-5(a) and BIO-5(b) for the replacement and protection of oak trees in the Specific Plan area.

  a. Retaining/barrier walls and other vertical boundaries shall be in tones compatible with surrounding terrain using textured materials or construction methods, which create a textured effect. Walls shall be landscaped to provide screening from adjacent open space areas, visual corridors, and gateways (Creston Road), using drought-tolerant, low-maintenance, and native species where appropriate. Perimeter landscaping of retention/drainage basins shall consist of low maintenance trees and shrubs.

  b. Retaining/barrier walls shall be limited to 6 feet in height, measured from the top of grade in front of the wall to the top of the wall cap. Where retaining conditions require walls to be higher than 6 feet, the wall shall be separated into two or more walls with a minimum of 3 feet between each wall for screen planting.

  c. Landscaping using native oak trees, shrubs, and groundcover shall be preferred to perimeter fencing to the maximum extent feasible. Where required, perimeter fencing shall be decorative or designed to minimize interference with wildlife movement.

  d. All medians and strips designated for landscaping shall utilize drought-tolerant species to the maximum extent feasible, consisting of low maintenance trees, shrubs, and groundcover that do not obstruct views for motorists, bicyclists, and pedestrians.

  e. Natural turf shall only be permitted in areas of active use and must comply with the city’s Water Efficient Landscape Ordinance standards. Decorative natural turf is prohibited.

  f. The extent, height, and quantity of cut and fill shall be minimized to the extent feasible to preserve natural components of the existing landscape, including existing oak trees.

The City finds that Mitigation Measure AES-2 and Mitigation Measure AG-2(a) are feasible, are adopted, and will further reduce impacts to aesthetic character of the project site. Accordingly, the City finds that, pursuant to Public Resources Code section 21081(a)(1) and State CEQA Guidelines section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project that mitigate or avoid the potentially significant impacts of the proposed project to aesthetic character, as identified in the EIR. Therefore, impacts are considered less than significant. Mitigation measures will further reduce impacts to aesthetic character. (Draft EIR, p. IV.F-11 to IV.F-17.)

2. **Impact AES-3:** The project would introduce new sources of light and glare that would increase light levels in the Specific Plan area vicinity, with the possibility of adversely affecting daytime and nighttime views. The project would replace existing agricultural and rural lands with residential and commercial uses. Development of the project site would result in an increase in ambient nighttime lighting through the addition of residential and commercial uses and associated exterior lighting, parking lot and security/safety lighting, and fixtures associated with the proposed structural development. Proposed park area would also include lighting for fields and nighttime activities.
Overall, levels of light and glare generated by new buildings and urban activity in the Specific Plan area would be comparable to typical light levels in the adjacent, urban environment and would be visually consistent with the existing urban development within the City to the north and west of the Specific Plan Area. Compliance with General Plan Policy LU-2D, including development of a City-approved lighting plan, and identified mitigation measures would ensure that this impact would remain less than significant with mitigation (Class II).

Mitigation: Impacts associated with the creation of new sources of exterior lighting and glare would be less than significant with the incorporation of Mitigation Measure AES-3 and General Plan Policy LU-2D, Action Item 5.

- Mitigation Measure AES-3 Sports Field Lighting Evaluation. Prior to issuance of building permits for a multi-purpose athletic field, a lighting and glare engineering design evaluation shall be prepared and submitted to the City of Paso Robles Community Development Department for review and approval. The design evaluation shall include, at minimum, an illumination summary based on the grid, spacing, height, and luminaire type of any proposed field lighting, and an evaluation of the extent and location of any offsite light trespass or glare. Field lighting shall be designed such that no light trespass would occur beyond the athletic field boundary and that no point-source light would be visible from beyond the athletic field boundary.

If the lighting and glare engineering design evaluation is prepared by a prospective vendor or manufacturer of the lighting system to be used on the project, an independent evaluation of the manufacturer’s lighting data shall be conducted for the purpose of confirming that no light trespass would occur beyond the athletic field boundary and that no point-source light would be visible from beyond the athletic field boundary. The independent evaluation shall be prepared by a qualified engineer who is not a prospective vendor or manufacturer of the lighting system to be used on the Project and findings shall be documented in a Lighting Evaluation Report for review and approval by the City of Paso Robles Community Development Department. The Lighting Evaluation Report shall include the following at a minimum:

a. If offsite light trespass or point-source visibility is identified in the Lighting Evaluation Report, specific recommendations shall be identified to eliminate such trespass and/or visibility. Recommendations may include but not be limited to: repositioning lights, lowering heights, increasing sizes of cut-off shields, altering types of luminaires or wattage, or modifying operational procedures.

b. The City shall include the recommendations made by the Lighting Evaluation Report as conditions of approval for the multi-purpose athletic field. The results of the Lighting Evaluation Report shall be field verified to ensure light trespass has been adequately eliminated at offsite locations and no point-source lighting is visible from beyond the athletic field boundary.

The City finds that Mitigation Measure AES-3 is feasible, is adopted, and will further reduce impacts to light and glare. Accordingly, the City finds that, pursuant to Public Resources Code section 21081(a)(1) and State CEQA Guidelines section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project that mitigate or avoid the potentially significant impacts of the proposed project to light and glare, as identified in the EIR. Therefore, impacts are considered less than significant. Mitigation measures will further reduce impacts to light and glare. (Draft EIR, p. IV.F-17 to IV.F-19.)
3. **Cumulative Aesthetic Impacts:** The project, in combination with approved, pending, and proposed development in Paso Robles and nearby unincorporated portions of San Luis Obispo County, would gradually alter the visual makeup of the urban fringe of the city from rural, semi-rural, or suburban to a more suburban or urban condition. Cumulative development would be located on infill sites throughout the city, as well as large tracts of undeveloped open spaces along the city’s urban perimeter, such as the Olsen-South Chandler Ranch project in the vicinity of the project site. Under existing San Luis Obispo County land use designations, cumulative development outside the city limit east, north, and south of the Specific Plan area would be limited to agricultural and rural residential development under the existing County’s agricultural land use designations.

Urban development under the BSP is anticipated in the Paso Robles General Plan and would be at a comparable density to existing development west of the Specific Plan area. Consistent with long-term buildout under the General Plan, the project would be required to adhere to the design standards of the General Plan and would be subject to discretionary review by the Planning Commission and/or City Council. The project is located within the Paso Robles Urban Reserve Line identified in the County of San Luis Obispo North County Area Plan and would not conflict with the County General Plan Land Use and Circulation Element.

New development in the city near the Specific Plan area would generally be of a type and intensity similar to existing urban uses north and west of the Specific Plan area. However, cumulative development on the southeastern urban fringe of the city, including the proposed project, as well as the Olsen-South Chandler Ranch project and North Chandler Ranch Vineyard Proposal, will permanently transform the visual character of the community as increased urbanization moves the urban/rural boundary further east toward the city limit and Urban Reserve Line. This effect on the visual character of the eastern end of the city would be cumulatively significant. With implementation of Mitigation Measure AES-2, the proposed Specific Plan would not degrade the aesthetic character in the Specific Plan area vicinity and the project’s contribution to cumulative conversion of semi-rural land to urban land would be less than significant (Class II).

Required preparation of an overall lighting plan that demonstrates compliance with the requirements of General Plan Policy LU-2D would ensure that new development in the Specific Plan area would not substantially contribute to significant cumulative impacts related to the introduction of new sources of light and glare. Potential cumulative impacts from other projects in the vicinity would be evaluated on a case-by-case basis based on conditions and views associated with individual sites and the planned design of specific projects. Cumulative impacts associated with new sources of lighting and glare would be less than significant with identified mitigation (Class II).

The City finds that Mitigation Measures AES-2 and AES-3 are feasible, are adopted, and will further reduce cumulative aesthetic impacts. Accordingly, the City finds that, pursuant to Public Resources Code section 21081(a)(1) and State CEQA Guidelines section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project that mitigate or avoid the potentially significant cumulative aesthetic impacts of the proposed project, as identified in the EIR. Therefore, impacts are considered less than significant. Mitigation measures will further reduce cumulative impacts to aesthetics. (Draft EIR, p. IV.F-19.)

**B. AGRICULTURAL AND FORESTRY RESOURCES**

1. **Impact AG-1:** The project would convert unique farmland and farmland of statewide importance, as mapped by the FMMP, to non-agricultural uses. Approximately 26.56 acres of Farmland of Statewide Importance and 13.6 acres of Unique Farmland are mapped within the Specific Plan area, entirely within the existing 39-acre vineyard (40-acre parcel). No lands within the Specific Plan Area or the
City of Paso Robles are enrolled in a Williamson Act contract. The FMMP shows that between 2008 and 2016 (the most recent data year), the amount of Important Farmland in the County decreased by 13,349 acres, approximately 3.25%. The proposed project would result in direct significant impacts related to the loss of Important Farmland per FMMP designations. Impacts would be significant but mitigable (Class II).

a. **Mitigation**: Implementation of Mitigation Measure AG-1 would conserve 26.1 acres of agricultural land. The soils types within the PG&E utility corridor are the same as the soils types in the onsite vineyard where the Important Farmland is located. Agricultural uses are the only feasible uses for the utility corridor and changing the land use and zoning designation of the corridor would ensure the project remains consistent with the 2003 FEIR and 2004 LAFCO findings for annexation of the Beechwood property. The LAFCO findings state: “The 2003 General Plan Update includes policies that enable clustered development within a Specific Plan area and further provides for the transfer of development rights from one portion of the site to another in order to preserve farmland. Implementation of these policies would avoid the significant environmental effect on farmland as identified in the Final EIR.” By changing the land use and zoning designation of the utility corridor, the potential for future development rights in the corridor would be limited and would prevent future mass residential or commercial development. The Specific Plan area is identified as a residential growth area in the City’s General Plan and the change of land use and zoning designation of the utility corridor would ensure that the soils that comprise Important Farmland are protected from future development and are available for agricultural use. Therefore, with implementation of identified mitigation, Project impacts on loss of Important Farmland would be reduced to less than significant.

− **Mitigation Measure AG-1 Conservation of Agriculture Land.** The project applicant shall revise the Specific Plan to change the land use and zoning designations of the PG&E ownership and easement area corridor to Agriculture.

2. The City finds that Mitigation Measure AG-1 is feasible, is adopted, and will further reduce impacts to farmland. Accordingly, the City finds that, pursuant to Public Resources Code section 21081(a)(1) and State CEQA Guidelines section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project that mitigate or avoid the potentially significant impacts of the proposed project to farmland, as identified in the EIR. Therefore, impacts are considered less than significant. Mitigation measures will further reduce impacts to farmland. (Draft EIR, p. IV.B-14 to IV.B-15.) **Impact AG-2:** The project would include development of residential uses adjacent to existing agricultural uses, which may result in conflicts that would adversely affect the long-term viability of agricultural uses on adjacent properties, including land use conflicts that may lead to disincentives to farm and conversion of productive farmland to other use. Development of the Specific Plan area would occur in two phases, resulting in a construction period that would last for several years. Each phase of construction would require extensive earthwork, which would result in fugitive dust that could impact off-site crops and other agricultural activities. Compliance with standard SLOAPCD dust control measures and city policies to provide buffers between urban and agricultural uses would ensure that impacts from short-term conflicts with agricultural uses during project construction would remain less than significant.

Residential development adjacent to nearby agricultural operations has the potential to create conflicts with each other. Introducing people near existing agriculture can cause conflicts, such as vandalism of farm equipment and fencing, crop theft, and soil compactions from trespassers or equestrians. This can impact the economic viability of the agricultural land. Air quality issues generated from urban uses can also impact adjacent crops. The farmer may also have to respond to
complaints generated from residents located adjacent to their land, requiring them to modify farm operations, which could in turn result in economic impacts to the farmer. Indirect impacts to agriculture that may arise from an urban use may include increased regulations and liability insurance to protect the farmer. These indirect impacts can result in a greater expenditure of time and money which in turn can adversely impact the viability of agricultural operations. Some farmers sensitive to nearby public uses voluntarily limit their hours of operation and do not intensively use the portions of their property closest to urban uses, in effect establishing informal buffer zones on their own property. This has the effect of lowering the crop yield, and therefore the long-term economic viability, of the agricultural operation.

Residents living adjacent to agricultural operations commonly cite odor nuisance impacts, noise from farm equipment, dust, and pesticide spraying as typical sources of conflict. The increase in residents in the Specific Plan area would increase the potential for these conflicts to arise with neighboring agricultural properties. Development within the Specific Plan area would also be required to comply with the City’s right to farm ordinance, to reduce conflicts with nearby agricultural operations by notifying prospective purchasers of land in close proximity to agricultural operations of the inherent problems, including agriculture-related sounds, dust, odor, fertilizers, pesticides, smoke, and vibrations, associated with such purchases. Nevertheless, the increase in the number of people residing adjacent to agricultural operations would present potential conflicts due to odor nuisance, noise from farm equipment, dust, and pesticide spraying experienced at the proposed residential lots. These conflicts could result in discontinuance of agricultural operations at properties adjacent to the Specific Plan area. General Plan Action Item 10 under Policy OS-1A and Action Item 4 under Policy LU-2E require the City to implement strategies to establish agricultural buffer easements, berms and/or vegetative screening, on property proposed for urban development as a condition of approval of discretionary development applications to protect agricultural operations in and beyond the City limits. In compliance with City policies, the framework roadway and public utility corridor rights-of-way along the southern and eastern boundaries of the Beechwood property would serve as buffers between the proposed uses and surrounding properties which would reduce and/ or avoid noise, dust, light impacts, odors, chemical use, and pesticide drift to new residential uses on the project site.

Compliance with General Plan Action Item 10 under Policy OS-1A and Action Item 4 under Policy LU-2E would ensure that land use conflicts between new residential uses and existing agricultural land uses would be minimized. This impact would be less than significant with mitigation (Class II).

a. Mitigation: Mitigation Measures AG-2(a) and AG-2(b) would provide for buffers and fencing that would reduce public access from the Specific Plan area to the adjacent agricultural properties and would minimize exposure of new residents to odor nuisance, noise from farm equipment, dust, and pesticide spraying from the adjacent agricultural operations. With implementation of these measures, impacts associated with potential long-term conflicts with agricultural uses would be reduced to a less than significant level. Agricultural fencing would not interfere substantially with the movement of any resident or migratory fish or wildlife species or with established resident or migratory wildlife corridors within the Specific Plan Area due to the disturbed and developed nature of this area.

- **Mitigation Measure AG-2(a) Agriculture Conflict Avoidance Measures.** The following language shall be added to the Specific Plan:

  Agricultural buffer easements, berms, and/or vegetative screening shall be implemented on newly recorded lots in the Specific Plan area adjacent to active agricultural uses outside of the Specific Plan area. Agricultural buffer easements, berms, and/or vegetative screening shall provide a minimum of 50 feet between active agricultural land uses outside of the Specific Plan area and new habitable structures in the Specific Plan area. The requirement will be a condition of approval of discretionary development applications, consistent with
the requirements of Action Item 10 under Policy OS-1A and Action Item 4 under Policy LU-2E in the City’s General Plan and will include City-approved measures to reduce availability of public access to agricultural cultivation areas adjacent to the project site (e.g., fencing, signs, etc.). Future residents shall be notified of agricultural buffers as part of purchase or lease agreements.

- **Mitigation Measure AG-2(b) Agricultural Fencing.** The project applicant shall coordinate with the City to fund installation of fencing and signs along the southern and eastern boundaries of the Beechwood property at locations where active agricultural operations are adjacent to the Specific Plan area to minimize potential for increases in trespass and vandalism of adjacent agricultural areas. Applicant shall coordinate as needed if fencing is established on PG&E easement or public rights of way.

The City finds that Mitigation Measures AG-2(a) and AG-2(b) are feasible, are adopted, and will further reduce impacts regarding agricultural conflict. Accordingly, the City finds that, pursuant to Public Resources Code section 21081(a)(1) and State CEQA Guidelines section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project that mitigate or avoid the potentially significant impacts of the proposed project regarding agricultural conflict, as identified in the EIR. Therefore, impacts are considered less than significant. Mitigation measures will further reduce impacts to agricultural conflict. (Draft EIR, p. IV.B-15 to IV.B-18, Final EIR, p. IV.B-17.)

**Cumulative Agricultural Impacts:** Planned, proposed, and approved projects in and around the City would result in the cumulative conversion of agricultural land to non-agricultural uses. The conversion of agricultural land within the City would potentially result in cumulative incompatibilities with existing agriculturally designated land uses and decrease in FMMP-designated Important Farmland, including Unique Farmland and Farmland of Statewide Importance. The project would result in the conversion of Unique Farmland and Farmland of Statewide Importance, including 39 acres in productive agricultural use to non-agricultural use. Therefore, the project would contribute to the cumulative conversion of agricultural land from planned, proposed, and approved projects in and around the City to non-agricultural uses. The project would be required to implement Mitigation Measure AG-1 to permanently conserve Important Farmland in adjacent agricultural areas located in the City’s Purple Belt. Therefore, the project’s contribution to cumulative Important Farmland impacts would be less than cumulatively considerable and cumulative impacts would be less than significant.

In addition, adherence to applicable General Plan policies, including the Purple Belt Action Plan, and the City’s right to farm ordinance would ensure that the contribution of individual projects in the City, including the Beechwood Specific Plan, to the cumulative loss of agricultural land within or surrounding the City would remain less than significant. Development of the Specific Plan area could result in incompatibilities between new residences and adjacent agricultural uses resulting in the potential conversion of farmland to non-agricultural uses. The project would be required to implement Mitigation Measures AG-2(a) and AG-2(b) to avoid potential conflicts associated with development of the project site and adjacent agricultural operations and avoid conversion of farmland to non-agricultural use. Therefore, the project’s contribution to cumulative agricultural resource impacts would be less than significant.

The City finds that Mitigation Measures AG-1, AG-2(a) and AG-2(b) are feasible, are adopted, and will further reduce cumulative agricultural impacts. Accordingly, the City finds that, pursuant to Public Resources Code section 21081(a)(1) and State CEQA Guidelines section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project that mitigate or avoid
the potentially significant cumulative agricultural impacts, as identified in the EIR. Therefore, impacts are considered less than significant. Mitigation measures will further reduce cumulative impacts to agricultural resources. (Draft EIR, p. IV.B-18.)

C. AIR QUALITY AND GREENHOUSE GAS EMISSIONS

1. Impact AQ-1: The project does not incorporate all applicable land use strategies and transportation control measures contained in the SLOAPCD 2001 CAP and would therefore be inconsistent with the 2001 CAP. The proposed project would result in an increase of approximately 2,478 residents. Based on U.S. Census data, the city’s existing population is approximately 32,212 residents. Under the medium growth scenario evaluated in the SLOCOG 2050 Regional Growth Forecast for San Luis Obispo County, the city’s population is estimated to total 37,858 residents in 2050. As compared to existing conditions, this equates to an increase of approximately 5,103 residents by year 2050. The proposed project would result in near-term increases in population that would not exceed the city’s population increase projection for year 2050. The project’s percent increase in total VMT (0.4%) would not exceed the project’s contribution to population growth (6.7%). Therefore, the project would be consistent with the 2001 CAP assumptions for VMT. Although the proposed Specific Plan would include pedestrian and bicycle facilities, detailed information is not available for all roadways to ensure the Specific Plan would be consistent with Land Use Planning Strategy L-4 and TCMs T-2A and T-2B. Therefore, the project is considered potentially inconsistent with these strategies. In addition, the project does not include specific provisions for future employers on the site to encourage telecommuting (TCM T-8), and the majority of the Plan Area would not be located within walking distance (i.e., 0.25 mile) of existing public transit (T-2A and T-2B). Therefore, the project would be inconsistent with applicable policies in the 2001 CAP. This impact would be less than significant with mitigation incorporated (Class II).

Mitigation: Implementation of Mitigation Measure AQ-1, T-1(a–c), T-2(a–b), T-5, and T-7(a–b) would require the incorporation of alternative transportation facilities, the promotion of alternative work schedules, the payment of fair share fees for public transit improvements, and the construction of circulation system improvements, all of which would address potential inconsistencies with the 2001 CAP transportation control measures and land use strategies. Therefore, impacts related to consistency with the 2001 CAP would be less than significant with mitigation incorporated (Class II).

– Mitigation Measure AQ-1 Alternative Transportation and Transportation Demand Management Measures. Prior to issuance of grading permits, the applicant shall incorporate into the Specific Plan applicable VMT-reducing measures from the SLOAPCD CEQA Air Quality Handbook. Consistent with SLOAPCD guidance, VMT-reducing measures shall include, but would not be limited to:

- Incorporate a goal/policy into the Specific Plan to expand San Luis Obispo County Regional Transit Authority Paso Express Routes A and B with new stops in the Specific Plan area to ensure a majority of the Specific Plan area is within 1/4 mile of a transit stop.
- Provide public transit amenities (e.g., covered transit turnouts, direct pedestrian access, bicycle racks, covered bench, smart signage, route information displays, lighting, etc.) in the Specific Plan area to facilitate expansion of Paso Express Routes A and B prior to building permit issuance.
- Develop an educational program with San Luis Obispo Regional Rideshare to provide occupants with alternative transportation and smart commute information (e.g., transportation board, electronic kiosk, new hire packets, web portal, newsletters, social media, etc.).
• Working with SLO Regional Rideshare, incorporate a goal/policy into the Specific Plan to implement programs that reduce both residential and non-residential VMT within the Beechwood Development (e.g., incentives; SLO Regional Rideshare trip reduction program; bicycle share programs; shuttles/vanpools; on-site employee lockers, showers, housing; alternative employee schedules [e.g., 9–80s, 4–10s, telecommuting, satellite worksites, etc.]).

• Implement circulation design elements in parking lots for non-residential uses to reduce vehicle queuing and improve the pedestrian environment.

• Exceed CalGreen standards for providing on-site bicycle parking at non-residential uses by 25 percent.

The City finds that Mitigation Measure AQ-1 is feasible, is adopted, and will further reduce impacts to CAP consistency. Accordingly, the City finds that, pursuant to Public Resources Code section 21081(a)(1) and State CEQA Guidelines section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project that mitigate or avoid the potentially significant impacts of the proposed project related to CAP consistency, as identified in the EIR. Therefore, impacts are considered less than significant. Mitigation measures will further reduce impacts to CAP consistency. (Draft EIR, p. IV.I-26 to IV.I-30; Final EIR, p. VII-51.)

Mitigation: According to the SLOAPCD CEQA Air Quality Handbook, for projects with estimated construction emissions that are expected to exceed SLOAPCD thresholds of significance, implementation of a SLOAPCD-approved CAMP and off-site mitigation in addition to standard and BACT measures would reduce potential air quality impacts to a less-than-significant level. Mitigation Measures AQ-2(a) through AQ-2(f) would require implementation of standard and BACT measures to reduce construction-generated emissions of fugitive dust and ozone precursors and would require implementation of a SLOAPCD-approved CAMP and off-site mitigation, as needed. In addition, Mitigation Measure AQ-2(g) would require implementation of fugitive dust control measures consistent with SLOAPCD requirements for projects with grading areas of greater than 4.0 acres. As a result, implementation of Mitigation Measures AQ-2(a) through AQ-2(g) would reduce construction-related air quality impacts to a less-than-significant level.

- Mitigation Measure AQ-2(a) Construction Activity Management Plan. Prior to the start of construction activities within the Specific Plan area, the project applicant shall prepare a Construction Activity Management Plan (CAMP) to reduce construction-generated emissions. At a minimum, the CAMP shall incorporate SLOAPCD-recommended measures for the control of construction-generated emissions and shall be submitted to the city for review and approval with the grading permit application. If implementation of SLOAPCD-recommended Standard and Best Available Control Technology (BACT) measures cannot reduce emissions below applicable SLOAPCD emissions thresholds, off-site mitigation may be required in coordination with
SLOAPCD. The emission control measures and potential off-site mitigation requirements contained in the CAMP shall apply to all construction activities facilitated by the proposed Specific Plan. The CAMP shall include the following elements:

- A Dust Control Management Plan that encompasses all, but is not limited to, dust control measures;
- Tabulation of on and off-road construction equipment (age, horsepower and miles and/or hours of operation);
- A schedule that restricts construction truck trips to non-peak hours to reduce peak-hour emissions;
- A limit on the length of the construction work-day period, if necessary;
- A schedule that phases construction activities, if appropriate; and
- Special provisions to address high heat and windy conditions.

The Applicant shall hire an independent 3rd party ARB certified Visible Emissions Monitor to monitor dust emissions from the project site. The Monitor shall be available to respond to complaints or reports of visible dust leaving the property during construction, on nights, weekends and holidays to ensure dust from the construction site is not leaving the construction site. The Monitor will maintain a log of visible emission observations, which includes images taken of dust being generated on the property and will make that log available to APCD inspectors on request. Contact information for the Visible Emissions Monitor shall be submitted to the APCD prior to the start of on-site grading.

Upon completion of CAMP item e (above) the Applicant shall report to the San Luis Obispo APCD the reasonable worst-case scenario construction phase emissions for the actual construction fleet. The report of actual construction fleet will also describe the application of BATC per MM AQ-2(C) below.

The project applicant shall retain a third-party air quality consultant to conduct periodic monitoring of implementation of the CAMP during construction activities in the Specific Plan area. The third-party consultant shall be approved by the city and shall submit quarterly reports to the city that evaluate implementation of the required elements of the CAMP.

Mitigation Measure AQ-2(b) Standard Control Measures for Construction Equipment.

The following standard mitigation measures shall be included in the CAMP and implemented during construction activities in the Specific Plan area to reduce construction-generated NOx, ROG, and DPM:

- Maintain all construction equipment in proper tune according to manufacturer’s specifications;
- Fuel all off-road and portable diesel powered equipment with CARB-certified motor vehicle diesel fuel (non-taxed version suitable for use off-road);
- Use diesel construction equipment meeting CARB’s Tier 2 certified engines or cleaner off-road heavy-duty diesel engines, and comply with the state Off-Road Regulation;
- Use on-road heavy-duty trucks that meet the CARB’s 2007 or cleaner certification standard for on-road heavy-duty diesel engines, and comply with the state On-Road Regulation;
- Construction or trucking companies with fleets that do not have engines in their fleet that meet the engine standards identified in the above two measures (e.g., captive or NOx exempt area fleets) may be eligible by proving alternative compliance;
f. All on and off-road diesel equipment shall not idle for more than 5 minutes. Signs shall be posted in the designated queuing areas and on job sites to remind drivers and operators of the 5 minute idling limit;
g. Diesel idling within 1,000 feet of sensitive receptors shall not be permitted;
h. Staging and queuing areas shall not be located within 1,000 feet of sensitive receptors;
i. Electrically-powered equipment shall be used when feasible;
j. Substitute gasoline-powered in place of diesel-powered equipment, where feasible; and
k. Use alternatively-fueled construction equipment on-site where feasible, such as compressed natural gas (CNG), liquefied natural gas (LNG), propane, or biodiesel.

— Mitigation Measure AQ-2(c) Best Available Control Technology (BACT) for Construction. The following BACT for diesel-fueled construction equipment shall be included in the CAMP and implemented during construction activities in the Specific Plan area to reduce construction-generated ozone precursor emissions:

a. Incorporate the use of newer off-road equipment with Tier 3 and Tier 4 engines where feasible;
b. Repower older off-road equipment with Tier 3 and Tier 4 engines where feasible;
c. Utilize heavy-duty trucks meeting the standards of CARB’s Truck and Bus Regulation for on-road heavy-duty diesel engines, which requires nearly all trucks to have 2010 or newer model year engines; and
d. Install California Verified Diesel Emission Control Strategies. Examples include, but are not limited to, diesel particulate filter systems, Purifilter Engine Control Systems, diesel retrofit systems, and Sootfilter systems.

— Mitigation Measure AQ-2(d) Architectural Coating. Construction of new development in the Specific Plan area shall use low-VOC content paints not exceeding 50 grams per liter. To the extent locally available, prefinished building materials or materials that do not require the application of architectural coatings shall be utilized. This requirement shall be incorporated into the CAMP.

— Mitigation Measure AQ-2(e) Idling Restrictions. The following measures shall be included in the CAMP and implemented to reduce construction emissions from on- and off-road construction equipment (NOx, ROG, and DPM). These measures shall be shown on grading and building plans:

   i. Staging and queuing areas shall not be located within 1,000 feet of sensitive receptors;
   ii. Diesel idling within 1,000 feet of sensitive receptors shall not be permitted;
   iii. Alternatively-fueled equipment shall be utilized where feasible; and,
   iv. Signs that specify the no-idling requirements shall be posted and enforced at the construction site.

b. Idling Restrictions for On-road Vehicles. 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:
i. Shall not idle the vehicle’s primary diesel engine for greater than five minutes at any location, except as noted in subsection (d) of the regulation; and,

ii. Shall not operate a diesel-fueled auxiliary power system (APS) to power a heater, air conditioner, or any ancillary equipment on that vehicle during sleeping or resting in a sleeper berth for greater than five minutes at any location when within 100 feet of a restricted area, except as noted in subsection (d) of the regulation.

In addition, signs shall be posted in the designated queuing areas and job sites to remind drivers of the five-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.

c. **Idling Restrictions for Off-road Equipment.** Off-road diesel equipment shall comply with the five-minute idling restriction identified in Section 2449(d)(3) of CARB’s In-Use Off-Road Diesel regulation: www.arb.ca.gov/regact/2007/ordiesl07/frooal.pdf. Signs shall be posted in the designated queuing areas and job sites to remind off-road equipment operators of the five-minute idling limit.

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**Mitigation Measure AQ-2(f) Off-Site Mitigation.** Based on the estimated emissions identified in the CAMP, off-site mitigation approved by SLOAPCD shall be implemented to reduce construction-related emissions generated by stationary and mobile sources prior to the start of construction activities within the Specific Plan area. In accordance with SLOAPCD methodology, excess emissions shall be multiplied by the cost effectiveness of mitigation as defined in the state’s current Carl Moyer Incentive Program Guidelines to determine the annual off-site mitigation amount. The project applicant shall coordinate with SLOAPCD to implement off-site reduction measures or pay the off-site mitigation amount plus an administration fee (to be determined by SLOAPCD) to SLOAPCD to administer emission reduction projects. Off-site emissions reduction measures may include, but would not be limited to, developing a funding program to provide the following emissions-reducing improvements:

a. Buy and scrap older heavy-duty diesel vehicles or equipment;
b. Replace/repower transit buses;
c. Replace/repower heavy-duty diesel school vehicles (i.e., bus, passenger or maintenance vehicles);
d. Retrofit or repower heavy-duty construction equipment, or on-road vehicles;
e. Replace/repower marine diesel engines;
f. Repower or contribute to funding clean diesel locomotive main or auxiliary engines;
g. Purchase Verified Diesel Emission Control Strategies for local school buses, transit buses or construction fleets;
h. Install or contribute to funding alternative fueling infrastructure (i.e., fueling stations for CNG, LPG, conductive and inductive electric vehicle charging, etc.); and
i. Expand of existing transit services.

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**Mitigation Measure AQ-2(g) Fugitive Dust Measures.** The following measures shall be implemented to reduce construction-generated fugitive dust. These measures shall be included in the Construction Activity Management Plan (CAMP) shown on grading and building plans:

a. Reduce the amount of the disturbed area where possible.
b. Use water trucks, SLOAPCD-approved dust suppressants, or sprinkler systems in sufficient quantities to prevent airborne dust from leaving the site and from exceeding the SLOAPCD’s limit of 20 percent opacity for greater than 3 minutes in any 60-minute period. Increased watering frequency would be required whenever wind speeds exceed 15 mph and during summer months (i.e., June through September). Reclaimed (non-potable) water should be used whenever possible. Please note that since water use is a concern due to drought conditions, the contractor or builder shall consider the use of a SLOAPCD-approved dust suppressant where feasible to reduce the amount of water used for dust control.

c. All dirt stockpile areas shall be sprayed with water or a SLOAPCD-approved dust suppressant daily as needed.

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

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

f. All disturbed soil areas not subject to revegetation shall be stabilized using approved chemical soil binders, jute netting, or other methods approved in advance by the City of Paso Robles.

g. All roadways, driveways, sidewalks, etc. to be paved shall be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used.

h. Vehicle speed for all construction vehicles shall not exceed 15 mph on any unpaved surface at the construction site.

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

j. Wheel washers shall be installed at the construction site entrance/exit, tires or tracks of all trucks and equipment leaving the site shall be washed, or other SLOAPCD-approved track-out prevention devices sufficient to minimize the track-out of soil onto paved roadways shall be implemented.

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

l. The burning of vegetative material shall be prohibited.

m. The contractor or builder shall designate a person or persons to monitor the fugitive dust emissions and enhance the implementation of the measures as necessary to minimize dust complaints, reduce visible emissions below 20 percent opacity, and to prevent transport of dust off-site. Their duties shall include holidays and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the SLOAPCD Compliance Division and City of Paso Robles prior to the start of any grading, earthwork or demolition.

n. When applicable, portable equipment, 50 horsepower or greater, used during construction activities shall be registered with the statewide Portable Equipment Registration Program (issued by CARB) or be permitted by SLOAPCD. Such equipment may include power screens, conveyors, internal combustion engines, crushers, portable generators, tub grinders, trommel screens, and portable plants (e.g., aggregate plant, asphalt plant, concrete plant).
The City finds that Mitigation Measures AQ-2(a) through AQ-2(g) are feasible, are adopted, and will further reduce impacts regarding criteria pollutants. Accordingly, the City finds that, pursuant to Public Resources Code section 21081(a)(1) and State CEQA Guidelines section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project that mitigate or avoid the potentially significant impacts of the proposed project regarding criteria pollutants, as identified in the EIR. Therefore, impacts are considered less than significant. Mitigation measures will further reduce impacts regarding criteria pollutants. (Draft EIR, p. IV.I-30 to IV.I-38, Final EIR, p. IV.I-33 and VII-59.)

3. Impact AQ-4: The Specific Plan would not expose sensitive receptors to substantial concentrations of toxic air contaminants or naturally-occurring asbestos. As a conceptual plan, the project does not propose any stationary sources of TAC emissions or industrial land uses, which are typically major sources of TAC emissions. Nevertheless, proposed commercial uses may include minor stationary TAC sources such as emergency diesel generators. New stationary sources would be required to comply with SLOACPD Rule 219, which establishes TAC emissions standards for stationary sources that are protective of public health. As a result, new stationary sources facilitated by the proposed Specific Plan would not expose on-site or nearby sensitive receptors to substantial TAC emissions. According to the SLOAPCD NOA Map for San Luis Obispo County, the Plan Area is not located in an area that is known to contain NOA (SLOAPCD 2019). Therefore, project construction activities, including excavation and grading, would not expose sensitive receptors to substantial NOA concentrations, and impacts would be less than significant. However, project demolition activities would have the potential to expose sensitive receptors to substantial concentrations of asbestos, lead, and localized particulate matter. Impacts would be less than significant with mitigation incorporated (Class II).

Mitigation: Implementation of Mitigation Measures AQ-2(a) through AQ-2(g) and AQ-3 (discussed below) would substantially reduce fugitive dust emitted during project construction as well as any fugitive dust generated during project operation. Mitigation Measure AQ-4 would require compliance with applicable regulatory requirements pertaining to exposure to asbestos and lead-based paints. As a result, implementation of Mitigation Measures AQ-2(a) through AQ-2(g), AQ-3, and AQ-4 would reduce air quality impacts to sensitive receptors to a less-than-significant level.

- Mitigation Measure AQ-4 Demolition Emission Control Measures. The following mitigation measures shall be implemented to reduce the disturbance of ACM and lead-coated materials.

a. Demolition of on-site structures (i.e., residential units and associated outbuildings) shall comply with the procedures required by the National Emission Standards for Hazardous Air Emissions requirements (NESHAP, 40 CFR, Part 61, Subpart M) for the control of asbestos emissions during demolition activities. SLOAPCD is delegated authority by the U.S. EPA to implement the Federal Asbestos NESHAP. Prior to demolition of on-site structures, SLOAPCD shall be notified, per NESHAP requirements.

b. If during the demolition of existing structures (i.e., residential units and associated outbuildings), paint is separated from the construction materials (e.g., chemically or physically), the paint waste shall be evaluated independently from the building material by a qualified hazardous materials inspector to determine its proper management. All hazardous materials shall be handled and disposed of in accordance with local, state and federal regulations. According to the Department of Toxic Substances Control (DTSC), if the paint is not removed from the building material during demolition (and is not chipping or peeling), the material can be disposed of as non-hazardous construction debris. The landfill operator shall be contacted prior to disposal of building material debris to determine any specific requirements the landfill may have regarding the disposal of lead-based paint materials. The disposal of demolition debris shall comply
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with any such requirements. Approval of a lead work plan and permit may be required. Lead work plans, if required, shall be submitted to SLOAPCD ten days prior to the start of demolition.

The City finds that Mitigation Measures AQ-2(a) through AQ-2(g), AQ-3, and AQ-4 are feasible, are adopted, and will further reduce impacts to sensitive receptors. Accordingly, the City finds that, pursuant to Public Resources Code section 21081(a)(1) and State CEQA Guidelines section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project that mitigate or avoid the potentially significant impacts of the proposed project to sensitive receptors, as identified in the EIR. Therefore, impacts are considered less than significant. Mitigation measures will further reduce impacts regarding sensitive receptors. (Draft EIR, p. IV.I-42 to IV.I-45.)

4. Impact

AQ-5: Grading and other earthmoving activities during project construction would have the potential to expose sensitive receptors to Coccidioides fungus, which can cause Valley Fever. This impact would be less than significant with mitigation incorporated.

Mitigation: Implementation of Mitigation Measures AQ-2(a) through AQ-2(g) and AQ-3 would require fugitive dust control measures during project construction and operation, which would reduce potential exposure risk for the Coccidioides fungus. Mitigation Measure AQ-5 would require implementation of protective measures to reduce health hazards associated with the Coccidioides fungus. As a result, implementation of Mitigation Measures AQ-2(a) through AQ-2(g), AQ-3, and AQ-5 would reduce air quality impacts to sensitive receptors to a less than significant level.

− Mitigation Measure AQ-5 Valley Fever Suppression Measures. The project application and contractor(s) shall implement the following measures during construction activities to reduce impacts related to Valley Fever.

a. If peak daily wind speeds exceed 15 mph or peak daily temperatures exceed 95 degrees Fahrenheit for three consecutive days, additional dust suppression measures (such as additional water or the application of additional soil stabilizer) shall be implemented prior to and immediately following ground disturbing activities. The additional dust suppression shall continue until winds are 10 mph or lower and outdoor air temperatures are below a peak daily temperature of 90 degrees for at least two consecutive days. The additional dust suppression measures shall be incorporated into the Construction Activity Management Plan (see Mitigation Measure AQ-2[a]).

b. Heavy construction equipment traveling on un-stabilized roads within the Specific Plan area shall be preceded by a water truck to dampen roadways and reduce dust from transportation along such roads. This measure shall be incorporated into the Construction Activity Management Plan (see Mitigation Measure AQ-2[a]).

c. The project developer(s) shall notify the San Luis Obispo County Public Health Department and the city not more than 60 nor less than 30 days before construction activities commence to allow the San Luis Obispo County Public Health Department opportunity to provide educational outreach to community members and medical providers, as well as enhanced disease surveillance in the area both during and after construction activities involving grading.

d. Prior to any project grading activity, the project construction contractor(s) shall prepare and implement a worker training program that describes potential health hazards associated with Valley Fever, common symptoms, proper safety procedures to minimize health hazards, and notification procedures if suspected work-related symptoms are identified during construction, including the fact that certain ethnic groups and immune-compromised persons are at greater risk of becoming ill with Valley Fever. The objective of the training shall be to ensure the workers are aware of the danger associated with
Valley Fever. The worker training program shall be included in the standard in-person training for project workers and shall identify safety measures to be implemented by construction contractors during construction. Prior to initiating any grading, the project applicant shall provide the city and the San Luis Obispo County Public Health Department with copies of all educational training material for review and approval. No later than 30 days after any new employee or employees begin work, the project applicant shall submit evidence to the city that each employee has acknowledged receipt of the training (e.g., sign-in sheets with a statement verifying receipt and understanding of the training).

e. The applicant shall work with a medical professional, in consultation with the San Luis Obispo County Public Health Department, to develop an educational handout for on-site workers and surrounding residents within three miles of the project site that includes the following information on Valley Fever:
   - Potential sources/causes
   - Common symptoms
   - Options or remedies available should someone be experiencing these symptoms
   - The location of available testing for infection

Prior to construction permit issuance, this handout shall have been created by the applicant and reviewed by the city. No less than 30 days prior to any surface disturbance (e.g., grading, filling, trenching) work commencing, this handout shall be mailed to all existing residences within three miles of the Specific Plan area.

The City finds that Mitigation Measures AQ-2(a) through AQ-2(g), AQ-3 and AQ-5 are feasible, are adopted, and will further reduce impacts to sensitive receptors regarding Valley Fever. Accordingly, the City finds that, pursuant to Public Resources Code section 21081(a)(1) and State CEQA Guidelines section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project that mitigate or avoid the potentially significant impacts of the proposed project to sensitive receptors regarding Valley Fever, as identified in the EIR. Therefore, impacts are considered less than significant. Mitigation measures will further reduce impacts to sensitive receptors. (Draft EIR, p. IV.I-45 to IV.I-47.)

5. Impact GHG-2: The project would not be consistent with the City’s CAP and the SLOCOG 2019 RTP without mitigation. This impact would be less than significant with mitigation incorporated (Class II).

Mitigation: Implementation of Mitigation Measures AQ-1, AQ-3 and GHG-2 would reduce daily VMT per capita and ensure that the project would be consistent with the mandatory” GHG-reduction measures in the City’s CAP. Mitigation Measure GHG-2 includes all “mandatory” GHG-reduction measures identified in the city’s CAP. Proposed non-residential land uses would also be designed and built to promote the use of electrically-powered building mechanical equipment in support of future ZNE goals for nonresidential structures. Therefore, Mitigation Measure GHG-2 would ensure that the project would be consistent with the city’s CAP. Implementation of Mitigation Measures AQ-1 and AQ-3 would reduce GHG emission relative to 2005 and ensure that the project would be consistent with SLOCOG’s 2019 RTP VMT targets for 2020 and 2030. For informational purposes, Table IV.I-15 of the Draft EIR summarizes GHG emissions reductions achieved by implementation of Mitigation Measure GHG-1 as well as the mobile source emissions reduction measures described in Mitigation Measure AQ-1. Impacts related to GHG emissions would be less than significant without mitigation
because the project’s GHG emissions would not exceed the thresholds for buildout year 2030. Nevertheless, as shown in Table IV.I-15, implementation of Mitigation Measures GHG-2 and AQ-1 would reduce project-related GHG emissions further below the level of significance.

— **Mitigation Measure GHG-2 Greenhouse Gas Reduction Measures.** The applicant shall incorporate into the Beechwood Specific Plan GHG emission reduction measures that are consistent with the “mandatory” measures identified in the Paso Robles Climate Action Plan (CAP). To the extent possible, “voluntary” measures identified in the city’s CAP should also be incorporated. Consistent with the city’s CAP, GHG reduction measures shall include, but would not be limited to:

a. All tract improvement plans, public improvement plans and on-site improvement plans shall utilize LED high-efficiency lights for parking lots, streets, trails, and other public areas. (CAP Measure E-5)

b. Building permit plans for all commercial buildings shall include only LED high-efficiency lights in parking areas and other exterior spaces. (CAP Measure E-5)

c. Building permit plans for all commercial and multi-family development shall include on-site bicycle parking beyond that required by the California Green Building Standards Code (e.g., lockers or a locked room with standard racks and access limited to bicyclists only). (CAP Measure TL-1)

d. All tentative subdivision maps and improvement plans within the Specific Plan area shall provide direct pedestrian and bicycle access from all cul-de-sacs and dead end streets that serve five or more properties to either a street or a dedicated multi-use path through the use of access easements, public dedications or similar means. Paths shall be improved or funded by the applicant before final subdivision maps may be recorded. (CAP Measure TL-2)

e. The Specific Plan transportation network shall be designed to minimize barriers to pedestrian access and interconnectivity. (CAP Measure TL-2)

f. The Specific Plan transportation network shall incorporate traffic calming improvements as appropriate (e.g., marked crosswalks, count-down signal timers, curb extensions, speed tables, raised crosswalks, median islands, minicircles, tight corner radii, etc.). (CAP Measure TL-2)

g. Prior to the approval of any/all tentative subdivision maps, the applicant shall consult with the SLORTA or successor agency to determine needed alterations to local bus routes. Before the recordation of the related final subdivision map(s), the applicant shall construct or fund infrastructure needed to provide safe and convenient access to public transit within and contiguous to the Plan Area (CAP Measure TL-3).

h. Any tentative subdivision map that results in the permanent closure of a road to automobile traffic shall include a pedestrian and bicycle connection through the road closure. Before the recordation of the related final subdivision map, the connection shall be improved or funded by the applicant. (CAP Measure TL-3)

i. The Specific Plan shall be designed accommodate future public transit bus stop pull outs as recommended by the SLORTA. (CAP Measure TL-3)

j. Specific Plan area development shall comply with CALGreen Tier 1 or Tier 2 standards for water efficiency and conservation. (CAP Measure W-1)

k. Subdivision improvement plans shall include infrastructure to accommodate recycled water when it becomes available. (CAP Measure W-1).
1. The Specific Plan Areas shall utilize recycled water to the maximum extent feasible when recycled water becomes available. (CAP Measure W-1)

m. Construction activity in the Specific Plan area shall divert a minimum of 65 percent of non-hazardous construction or demolition debris. (CAP Measure S-1)

n. Street trees shall be planted on all public and private streets to provide significant street shading at maturity. Street trees shall be planted at a spacing equal to the expected width of the tree at maturity (i.e., if a tree species grows to 30 feet in width, it shall be planted at an average spacing of 30 feet on center). (CAP Measure T-1)

o. The city shall encourage the use of electrically powered appliances (e.g., water heaters, clothes dryers, cooking appliances, pool heating systems). Where gas appliances are installed, electrical services shall be provided to accommodate future retrofit to electrical appliances.

The City finds that Mitigation Measures AQ-1, AQ-3, and GHG-2 are feasible, are adopted, and will further reduce impacts regarding CAP consistency. Accordingly, the City finds that, pursuant to Public Resources Code section 21081(a)(1) and State CEQA Guidelines section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project that mitigate or avoid the potentially significant impacts of the proposed project regarding CAP consistency, as identified in the EIR. Therefore, impacts are considered less than significant. Mitigation measures will further reduce impacts regarding CAP consistency. (Draft EIR, p. IV.I-49 to IV.I-52, Final EIR, p. VII-60.)

6. Cumulative Greenhouse Gas Impacts: Growth within Paso Robles would result in increased GHG emissions from vehicle trips, energy consumption, and other sources. Analyses of GHGs are cumulative in nature because project-level GHG emissions contribute to the cumulative impact of the accumulation of GHGs in the atmosphere. Projects falling below the impact thresholds discussed above would have a less than significant impact, both individually and cumulatively. As indicated in Impact GHG-1, GHG emissions associated with the project would be less than significant, and as discussed in Impact GHG-2, the project would not conflict with applicable plans, policies, and regulations adopted for the purpose of reducing GHG emissions with implementation of Mitigation Measure GHG-2. Therefore, the project’s contribution to significant cumulative impacts related to GHG emissions is not cumulatively considerable with implementation of required mitigation (Class II).

The City finds that Mitigation Measure GHG-2 is feasible, is adopted, and will further reduce cumulative GHG impacts. Accordingly, the City finds that, pursuant to Public Resources Code section 21081(a)(1) and State CEQA Guidelines section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project that mitigate or avoid the potentially significant impacts of the proposed project regarding cumulative GHG impacts, as identified in the EIR. Therefore, impacts are considered less than significant. Mitigation measures will further reduce cumulative GHG impacts. (Draft EIR, p. IV.I-54.)

D. BIOLOGICAL RESOURCES

1. Impact BIO-1: Several special status plants occur in the vicinity. However, based on known restrictions in range and/or known extirpation, most of these species are unlikely to occur in the Specific Plan area. In addition, no state or federally listed, proposed, candidate or other special status plant species were observed within the Specific Plan area during the botanical inventories conducted for the project. The surveys were seasonally timed to correspond with the blooming periods for the sensitive plant species that have potential to occur on site. Therefore, impacts to special status plant species from the proposed project would be less than significant. The project would result in impacts to special status wildlife species including Lewis’ woodpecker, loggerhead shrike, Northern...
California legless lizard, ferruginous hawk, San Joaquin kit fox, Western spadefoot toad, American badger, pallid bat, Townsend’s big-eared bat, Swainson’s hawk, and vernal pool fairy shrimp, if present. Ground disturbing activities could result in injury or mortality of individuals of the species and remove suitable habitat. This impact would be less than significant with mitigation (Class II).

a. **Mitigation:** Mitigation Measures BIO-1(a) through BIO-1(g) would be required to reduce impacts to special status animal species.

   — **Mitigation Measure BIO-1(a) San Joaquin Kit Fox Compensatory Mitigation.** Compensatory mitigation for the removal of SJKF habitat shall be provided at a ratio of not less than 3:1 (area mitigated: area impacted) consistent with the County of San Luis Obispo standard mitigation ratio for SJKF at the project location (San Luis Obispo County, 2007) and evaluation conducted by Althouse and Meade, Inc. (Appendix B), unless a lower ratio is approved by CDFW, in which case that ratio shall apply. Compensatory mitigation shall be accomplished through one of the three following methods:

   a. The Owner/Applicant shall establish an on-site and/or offsite conservation easement of suitable size to offset impacts to SJKF habitat at a ratio of not less than 3:1 (area mitigated: area impacted) or an alternative ratio if approved by CDFW and shall be located in the SJKF corridor area (e.g., within the San Luis Obispo County SJKF habitat area northwest of Highway 58). Mitigation areas shall contain equal or greater SJKF habitat value than those impacted. Compensatory mitigation areas shall have a restrictive covenant prohibiting future development/disturbance and shall be managed in perpetuity to encourage persistence and enhancement of SJKF. Compensatory mitigation lands cannot be located on land that is currently held publicly for resource protection. The compensatory mitigation areas shall be managed by a conservation lands management entity or other qualified easement holder. The Owner/Applicant shall provide fees sufficient to cover administrative costs incurred in the creation of the conservation easement (appraisal, documenting baseline conditions, etc.) and funds in the form of a non-wasting endowment to cover the cost of monitoring and enforcing the terms of the conservation easement in perpetuity. Lands to be conserved as well as determination of a qualified easement holder will be subject to the review and approval of the USFWS, CDFW, and City.

   b. If acceptable by the USFWS, CDFW, and City, funds shall be deposited into an approved in-lieu fee program, which would provide for the protection in perpetuity of suitable habitat in the SJKF corridor area within San Luis Obispo County which can be completed by providing funds to The Nature Conservancy pursuant to the San Luis Obispo County SJKF Voluntary Fee-Based Compensatory Mitigation Program (Program). The fee would be determined based on the current (at time of grading permit application) cost-per-unit, per acre of mitigation.

   c. The Owner/Applicant shall purchase credits at a USFWS and CDFW-approved conservation bank, specifically the Palo Prieto Conservation Bank. The total fee would be determined based on the current (at time of grading permit application) cost-per-credit, per acre of mitigation.

   — **Mitigation Measure BIO-1(b) San Joaquin Kit Fox Impact Avoidance and Minimization.** The Owner/Applicant shall ensure the following actions are implemented to avoid and minimize potential impacts to SJKF:

   a. Prior to issuance of grading and/or construction permits, the Owner/Applicant shall provide evidence that they have retained a qualified biologist acceptable to the city. The qualified biologist shall perform the following monitoring activities:
i. Prior to issuance of grading and/or construction permits and within 30 days prior to initiation of site disturbance and/or construction, a qualified biologist shall conduct a preactivity (i.e., pre-construction) survey for known or potential kit fox dens and submit a letter to the city reporting the date the survey was conducted, the survey protocol, survey results, and what measures were necessary (and completed), as applicable, to address any kit fox activity within the project limits.

ii. The qualified biologist shall conduct weekly site visits during site-disturbance activities (i.e., grading, trenching, diskng, excavation, stock piling of dirt or gravel, etc.) that proceed longer than 14 days. Site disturbance activities lasting up to 14 days do not require weekly monitoring by the biologist unless observations of kit fox or their dens are made on-site or the qualified biologist recommends monitoring for some other reason. When weekly monitoring is required, the biologist shall submit weekly monitoring reports to the city.

iii. Prior to or during project activities, if any observations are made of SJKF, or any known or potential SJKF dens are discovered within the project limits, work shall stop and the qualified biologist shall re-assess the probability of incidental take (e.g., harm or death) to SJKF. At the time a den is discovered, the biologist shall contact USFWS and the CDFW for guidance on possible additional SJKF protection measures to implement and whether or not a Federal and/or state incidental take permit is needed. If a potential den is encountered during construction, work shall stop until such time the USFWS/CDFW determines it is appropriate to resume work.

If incidental take of SJKF during project activities is determined to be possible by the qualified biologist before project activities commence, the Owner/Applicant must consult with the USFWS and CDFW. Work shall not commence until the Owner/Applicant has obtained all necessary permits and approvals and shall implement measures as required by these permits and approvals. In addition, the qualified biologist shall implement the following measures:

i. Within 30 days prior to initiation of site disturbance and/or construction, fenced exclusion zones shall be established around all known and potential SJKF dens as defined in the Standardized Recommendations for Protection of the San Joaquin Kit Fox Prior to or During Ground Disturbance (USFWS 2011). Exclusion zone fencing shall consist of either large flagged stakes connected by rope or cord, or survey laths or wooden stakes prominently flagged with survey ribbon. Each exclusion zone shall be roughly circular in configuration with a radius of the following distance measured outward from the den or burrow entrances:

- Potential kit fox den: 50 feet
- Known or active kit fox den: 100 feet
- Kit fox pupping den: 150 feet

ii. All foot and vehicle traffic, as well as all construction activities, including storage of supplies and equipment, shall remain outside of exclusion zones. Exclusion zones shall be maintained until all project-related disturbances have been terminated, and then shall be removed.

iii. If SJKF or known or potential SJKF dens are found onsite, daily monitoring by a qualified biologist shall be required during ground disturbing activities.

b. If incidental take of SJKF during project activities is determined to be possible by the qualified biologist before project activities commence, the Owner/Applicant must consult with the USFWS and CDFW. Work shall not commence until the Owner/Applicant has obtained all necessary permits and approvals and shall implement measures as required by these permits and approvals. In addition, the qualified biologist shall implement the following measures:

i. Within 30 days prior to initiation of site disturbance and/or construction, fenced exclusion zones shall be established around all known and potential SJKF dens as defined in the Standardized Recommendations for Protection of the San Joaquin Kit Fox Prior to or During Ground Disturbance (USFWS 2011). Exclusion zone fencing shall consist of either large flagged stakes connected by rope or cord, or survey laths or wooden stakes prominently flagged with survey ribbon. Each exclusion zone shall be roughly circular in configuration with a radius of the following distance measured outward from the den or burrow entrances:

- Potential kit fox den: 50 feet
- Known or active kit fox den: 100 feet
- Kit fox pupping den: 150 feet

ii. All foot and vehicle traffic, as well as all construction activities, including storage of supplies and equipment, shall remain outside of exclusion zones. Exclusion zones shall be maintained until all project-related disturbances have been terminated, and then shall be removed.

iii. If SJKF or known or potential SJKF dens are found onsite, daily monitoring by a qualified biologist shall be required during ground disturbing activities.
mortality of the San Joaquin kit fox”. Speed limit signs shall be installed in the Specific Plan area within 30 days prior to initiation of site disturbance and/or construction.

d. Prior to issuance of grading and/or construction permit and within 30 days prior to initiation of site disturbance and/or construction, all personnel associated with the project shall attend a worker education training program, conducted by a qualified biologist, to avoid or reduce impacts on sensitive biological resources including SJKF. At a minimum, as the program relates to SJKF, the training shall include the SJKF life history, all mitigation measures specified by the city, USFWS and CDFW (if applicable), as well as any related biological report(s) prepared for the project. The Owner/Applicant shall notify the city shortly prior to this meeting. A SJKF fact sheet shall also be developed prior to the training program, and distributed at the training program to all contractors, employers and other personnel involved with the construction of the project.

e. During the site disturbance and/or construction phase, grading and construction activities after dusk shall be prohibited unless coordinated through the city, during which additional SJKF mitigation measures may be required.

— Mitigation Measure BIO-1(c) Western Spadefoot Toad Impact Avoidance and Minimization. The Owner/Applicant shall ensure the following actions are implemented to avoid and minimize potential impacts to western spadefoot toad:

a. For work conducted during the western spadefoot toad migration and breeding season (November 1 to May 31), a qualified biologist will survey the active work areas (including access roads) in mornings following measurable precipitation events. Construction may commence once the biologist has confirmed that no western spadefoot toad (any life stage) are in the work area.

b. If adult western spadefoot toad is found within the construction footprint, it will be allowed to move out of harm’s way of its own volition, or a qualified biologist will relocate the individual to the nearest burrow that is outside of the construction impact area. If toads are likely to be present during a particular activity and timeframe, specifically following measurable precipitation it is required prior to each beginning work day, a qualified biologist will inspect underneath equipment and stored pipes greater than 1.2 inches (3 cm) in diameter for western spadefoot toad. If any are found, they will be allowed to move out of the construction area under their own accord, or a qualified biologist will relocate the individual to the nearest burrow that is outside of the construction impact area.

c. Trenches and holes will be covered and inspected by the construction contractor daily for stranded animals. Trenches and holes deeper than one foot deep will contain escape ramps (maximum slope of 2:1) to allow trapped animals to escape uncovered holes or trenches. Holes and trenches will be inspected by the construction contractor prior to filling.

— Mitigation Measure BIO-1(d) Pallid Bat and Townsend’s Big-Eared Bat Impact Avoidance and Minimization. The Owner/Applicant shall ensure the following actions are implemented to avoid and minimize potential impacts to special status bat species:

a. Upon project approval and prior to construction (including tree removal and demolition of structures), a qualified biologist shall conduct a survey of all trees and structures in the Specific Plan area to determine if roosting bats are present during the non-breeding season (November through March). The biologist shall also have access to all interior attics, as needed. If a colony of bats is found roosting in any tree or structure, further surveys shall be conducted sufficient to determine the species present and the type of roost (day, night, maternity, etc.). If the bats are not part of an active maternity colony,
passive exclusion measures may be implemented with approval from CDFW. Exclusions shall occur outside the breeding season (typically May through August) and winter hibernation (typically December through February).

b. If bats are roosting in tree cavities or structures in the Specific Plan area during the daytime but are not part of an active maternity colony, then exclusion measures must include one-way valves that allow bats to get out but are designed so that the bats may not re-enter the structure.

c. If a bat colony is excluded, appropriate alternate bat habitat shall be installed in or adjacent to the Specific Plan area. For each occupied roost removed, one bat box shall be installed in similar habitat and should have similar cavity or crevices properties to those which are removed, including access, ventilation, dimensions, height above ground, and thermal conditions. The location and design of the bat box(es) shall be subject to approval by the city in coordination with a qualified biologist. Active maternal bat colonies may not be disturbed during the pupping season (April through July).

- **Mitigation Measure BIO-1(e) Northern California Legless Lizard Impact Avoidance and Minimization.** A preconstruction survey for legless lizards shall be conducted around the base of oak trees in proposed work areas immediately prior to ground-disturbing activities or tree removal. The preconstruction survey shall be conducted by a qualified biologist familiar with legless lizard ecology and survey methods, and with approval from the CDFW to relocate legless lizards out of harm’s way. The scope of the survey shall be determined by a qualified biologist and shall be sufficient to determine presence or absence in the project areas. If the focused survey results are negative, a letter report shall be submitted to the City, and no further action shall be required. If legless lizards are found to be present in the proposed work areas the following steps shall be taken:

  a. Legless lizards shall be captured by hand by the project biologist and relocated to an appropriate location well outside the project areas.

  b. Construction monitoring shall be required for all new ground-disturbing activities located within legless lizard habitat (under tree canopies with leaf litter or thatch). Biologists shall capture and relocate legless lizards as specified above.

  c. A letter report shall be submitted to the City and CDFW within 30 days of legless lizard relocation, or as directed by CDFW.

- **Mitigation Measure BIO-1(f) Nesting Birds Impact Avoidance and Minimization.** If initial ground disturbing activities and vegetation removal occurs during the typical avian nesting period, between March 15 and August 15, nesting bird surveys shall be conducted by a qualified biologist within one week prior to initial ground disturbance activities or removal of vegetation. Surveys shall continue to be conducted within the timeframes specified above until all vegetation removal activities are completed. If surveys do not locate nesting birds, construction activities may be conducted. If nesting birds are located, no construction activities shall occur within 100 feet of nests of passerine species and 300 feet of nests of raptor species until chicks are fledged. A pre-construction survey report shall be submitted to the city immediately upon completion of the survey. The report shall detail appropriate fencing or flagging of the buffer zone and make recommendations on additional monitoring requirements. A map of the Specific Plan area and nest locations shall be included with the report. The biologist conducting the nesting survey shall have the authority to reduce or increase the recommended buffer depending upon site conditions.
— **Mitigation Measure BIO-1(g) Worker Environmental Awareness Program Training.**

Prior to the initiation of construction activities (including staging and mobilization), the Owner/Applicant shall ensure all personnel associated with project construction attend a Worker Environmental Awareness Program (WEAP) training.

The training shall be conducted by a qualified biologist, to aid workers in recognizing special status resources that may occur in the project area. The specifics of this program shall include identification of the sensitive species and habitats, a description of the regulatory status and general ecological characteristics of sensitive resources, and review of the limits of construction and avoidance measures required to reduce impacts to biological resources within the work area. A fact sheet conveying this information shall also be prepared for distribution to all contractors, their employers, and other personnel involved with construction of the project. All employees shall sign a form provided by the trainer documenting they have attended the WEAP and understand the information presented to them.

The City finds that Mitigation Measures BIO-1(a) through BIO-1(g) are feasible, are adopted, and will further reduce impacts to sensitive species. Accordingly, the City finds that, pursuant to Public Resources Code section 21081(a)(1) and State CEQA Guidelines section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project that mitigate or avoid the potentially significant impacts of the proposed project to sensitive species, as identified in the EIR. Therefore, impacts are considered less than significant. Mitigation measures will further reduce impacts to sensitive species. (Draft EIR, p. IV.C-18 to IV.C-27, Final EIR, p. IV.C-24.)

2. **Impact BIO-2:** The project would result in direct and indirect impacts to sensitive natural communities, including potentially jurisdictional drainage features and wetlands. Direct impacts would include construction activities and placement of project components within the drainage features and indirect impacts could include erosion, sedimentation, and accidental release of hazardous construction materials during construction activities. Based on the proposed development plan, buildout of the Specific Plan is conservatively estimated to result in approximately 0.35 acre of temporary impacts and approximately 0.29 acre of permanent impacts to federally protected wetlands, and 350 linear feet (0.01 acre) of temporary impacts to federally protected non-wetland waters (Drainage B). This impact would be less than significant with mitigation (Class II).

Mitigation: Implementation of BIO-2(a) through BIO-2(c) mitigation measures would reduce impacts to wetlands, jurisdictional other waters, and sensitive natural communities to a less-than-significant level (Class II).

— **Mitigation Measure BIO-2(a) Agency Coordination.** Impacts to drainages and wetlands as a result of the project are anticipated to require permits from USACE, USFWS, RWQCB, and CDFW. The Owner/Applicant shall comply with all federal and state permitting requirements. The Owner/Applicant shall obtain and produce for the city correspondence from applicable federal and state agencies regarding compliance of the proposed development with federal and state laws.

— **Mitigation Measure BIO-2(b) Wetland Drainage Mitigation.** Impacts to federal wetland areas and drainages (as defined by CWA Section 404) shall be mitigated at a minimum ratio of 2:1 for permanent impacts (acres of habitat restored to acres permanently impacted) and 1:1 for temporary impacts (acres of habitat restored to acres temporarily impacted). A habitat mitigation and monitoring program (HMMP) shall be developed by a qualified biologist. The mitigation shall be implemented for no less than five years after construction or until the local jurisdiction and/or the permitting authority (e.g., USACE) has determined that restoration has been successful.
Mitigation Measure BIO-2(c) Jurisdictional Areas Best Management Practices During Construction. The following best management practices shall be required for grading and construction within jurisdictional areas or wetlands where impacts are authorized. In addition, the measures shall be required at locations where construction occurs within 100 feet from jurisdictional areas or wetlands.

a. Access routes, staging, and construction areas shall be limited to the minimum area necessary to achieve the project goal and minimize impacts to other waters (federal and state) including locating access routes and ancillary construction areas outside of jurisdictional areas.

b. To control erosion and sediment runoff during and after project implementation, appropriate erosion control materials shall be deployed and maintained to minimize adverse effects on jurisdictional areas in the vicinity of the project.

c. Project activities within the jurisdictional areas should occur during the dry season (typically between May 1 and September 30) in any given year, or as otherwise directed by the regulatory agencies. Deviations from this work window can be made with permission from the relevant regulatory agencies.

d. During construction, no litter or construction debris shall be placed within jurisdictional areas. All such debris and waste shall be picked up daily and properly disposed of at an appropriate site.

e. All project-generated debris, building materials, and rubbish shall be removed from jurisdictional areas and from areas where such materials could be washed into them.

f. Raw cement, concrete or washings thereof, asphalt, paint or other coating material, oil or other petroleum products, or any other substances which could be hazardous to aquatic species resulting from project-related activities, shall be prevented from contaminating the soil and/or entering jurisdictional areas.

g. All refueling, maintenance, and staging of equipment and vehicles shall occur at least 100 feet from bodies of water and in a location where a potential spill would not drain directly toward aquatic habitat (e.g., on a slope that drains away from the water source). Prior to the onset of work activities, a plan must be in place for prompt and effective response to any accidental spills. All workers shall be informed of the importance of preventing spills and of the appropriate measures to take should an accidental spill occur.

The City finds that Mitigation Measures BIO-2(a) through BIO-2(c) are feasible, are adopted, and will further reduce impacts to sensitive natural communities. Accordingly, the City finds that, pursuant to Public Resources Code section 21081(a)(1) and State CEQA Guidelines section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project that mitigate or avoid the potentially significant impacts of the proposed project to sensitive natural communities, as identified in the EIR. Therefore, impacts are considered less than significant. Mitigation measures will further reduce impacts to sensitive natural communities. (Draft EIR, p. IV.C-27 to IV.C-30.)

3. Impact BIO-3: The project would impact Federally and state-protected wetlands through direct removal, filling, or hydrological interruption. Direct impacts would include construction activities and placement of project components within the drainage features and indirect impacts could include erosion, sedimentation, and accidental release of hazardous construction materials during construction activities. Based on the proposed development plan, buildout of the Specific Plan is conservatively estimated to result in approximately 0.35 acre of temporary impacts and approximately 0.29 acre of permanent impacts to federally protected wetlands, and 350 linear feet (0.01 acre) of temporary impacts to federally protected non-wetland waters (Drainage B). This impact would be less than significant with mitigation (Class II).
Mitigation: Implement Mitigation Measures BIO-2(a) through BIO-2(c). Implementation of the above mitigation measures would reduce impacts to jurisdictional areas to a less-than-significant level (Class II).

The City finds that Mitigation Measures BIO-2(a) through BIO-2(c) are feasible, are adopted, and will further reduce impacts to wetlands. Accordingly, the City finds that, pursuant to Public Resources Code section 21081(a)(1) and State CEQA Guidelines section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project that mitigate or avoid the potentially significant impacts of the proposed project to wetlands, as identified in the EIR. Therefore, impacts are considered less than significant. Mitigation measures will further reduce impacts to wetlands. (Draft EIR, p. IV.C-30.)

4. Impact BIO-4: The project would interfere with the movement of wildlife species through the development of currently undeveloped land. This impact would be less than significant with mitigation (Class II).

Mitigation: Implement Mitigation Measures BIO-1(a) through BIO-1(g). Implementation of the above mitigation measures would reduce impacts to jurisdictional areas to a less-than-significant level (Class II).

The City finds that Mitigation Measures BIO-1(a) through BIO-1(g) are feasible, are adopted, and will further reduce impacts to wildlife movement. Accordingly, the City finds that, pursuant to Public Resources Code section 21081(a)(1) and State CEQA Guidelines section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project that mitigate or avoid the potentially significant impacts of the proposed project to wildlife movement, as identified in the EIR. Therefore, impacts are considered less than significant. Mitigation measures will further reduce impacts to wildlife movement. (Draft EIR, p. IV.C-31.)

5. Impact BIO-5: Development of the Specific Plan area would result in the removal of oak trees protected under the City of Paso Robles Oak Tree Protection Ordinance if they are greater than 6 inches in diameter at 4.5 feet above ground level. This impact would be less than significant with mitigation (Class II).

a. Mitigation: Mitigation Measures BIO-5(a) and BIO-5(b) would be required to reduce impacts to protected trees to less than significant.

   Mitigation Measure BIO-5(a) Oak Tree Compensatory Mitigation. The Owner/Applicant shall ensure the following actions are implemented to compensate for impacts to protected oak trees:

   a. Impacted oaks shall be mitigated for by planting one 24-inch boxed tree with at least a 1.5-inch diameter for impacts less than 50% of the critical root zone (CRZ; area of root space that is within a circle circumscribed around the trunk of a tree using a radius of one foot per inch diameter at breast height) as defined by the City Oak Tree Protection Ordinance. Two 24-inch boxed trees shall be planted for trees with impacts of 50% or greater of the tree. The mitigation trees shall be planted within the Specific Plan area and incorporated into the landscape plan. If boxed trees are not available, or are not sourced from California’s central coast region, smaller caliper trees may be planted at a ratio of 5:1 for each tree removed. Additional trees may be planted from acorns collected on site, protected from below and above-ground browse damage, and counted as mitigation trees if they reach a height of 3 feet by Year 7 and exhibit high vigor.

   b. Oak trees removed by the project shall be replaced in accordance with the Paso Robles Oak Tree Protection Ordinance. Replacement oaks for removed trees must be equivalent to 25% of the diameter of the removed tree(s). For example, the replacement requirement for removal of two trees of 15 inches DBH (30 total diameter inches), would be 7.5
inches (30 inches removed x 0.25 replacement factor). This requirement could be satisfied by planting five 1.5-inch trees, or three 2.5-inch trees, or any other combination totaling 7.5 inches. A minimum of two 24-inch box, 1.5-inch trees shall be required for each oak tree removed.

Replacement trees shall be seasonally maintained (browse protection, weed reduction and irrigation, as needed) and monitored annually for at least 7 years by a city-approved arborist. The arborist shall prepare an annual report detailing the condition of each replacement tree and any maintenance activities conducted. Any trees that are dead or in decline during the 7 year monitoring will be replaced and monitored for an additional 7 years after the replacement is planted.

— Mitigation Measure BIO-5(b) Oak Tree Protection. The Owner/Applicant shall ensure the following actions are implemented to avoid and minimize potential impacts to protected oak trees:

a. Tree canopies and trunks within 50 feet of proposed disturbance zones shall be mapped and numbered by a city-approved arborist or biologist and a licensed land surveyor. Data for each tree shall include date, species, number of stems, diameter at breast height (DBH) of each stem, CRZ diameter, canopy diameter, tree height, health, habitat notes, and nests observed.

b. An oak tree protection plan shall be prepared and approved by the city that outlines the specific tree protection measures that will apply to each protected oak tree in the Specific Plan area.

c. Impacts to the oak canopy or CRZ shall be avoided where practicable. Impacts include pruning, any ground disturbance within the dripline or CRZ of the tree (whichever distance is greater), and trunk damage.

d. Protective fencing shall be installed at the edge of the critical root zone or line of encroachment for each tree or group of trees that will not be removed. The fence shall be installed before any construction or earth moving begins. The proposed fencing shall be shown on the grading plan. It must be a minimum of 4' high chain link, snow or safety fence staked (with t-posts 8 feet on center). The Owner/Applicant shall be responsible for maintaining an erect fence throughout the construction period. The arborist(s), upon notification, will inspect the fence placement once it is erected. After this time, fencing shall not be moved without arborist inspection/approval. If the orange plastic fencing is used, a minimum of four zip ties shall be used on each stake to secure the fence. Weatherproof signs shall be permanently posted on the fences every 50 feet, with the following information: “Tree Protection Zone: No personnel, equipment, materials, or vehicles allowed.”

e. Oil, gasoline, chemicals and other construction materials or equipment which might be harmful to oak trees shall not be stored within the CRZ of the tree.

f. Slopes and drains shall be installed according to the city specifications so as to avoid harm to the oak trees due to excess watering. All impacts within the CRZ (e.g., grading, trenching, pruning, utility placement) shall be supervised by a certified arborist approved by the city or the arborist’s designated biologist.

g. Damage to any tree during construction shall be immediately treated, as appropriate, by an arborist approved by the city to prevent disease or pest infestation. Damage will be reported to the city during each month of construction. The property owner shall be responsible for correcting any damage to oak trees on the property in a manner specified by an arborist approved by the city at the Owner/Applicant's expense.
h. No paint thinner, paint, plaster or other liquid or solid excess or waste construction materials or waste water shall be dumped on the ground or into any grate between the outer edge of the CRZ and the base of the oak trees, or uphill from any oak tree where such substance might reach the roots through a leaching process.

i. Wires, signs and other similar items shall not be attached to the oak trees.

j. All root pruning shall be completed with sharpened hand pruners. Pruned roots shall be immediately covered with soil or moist fabric.

k. Oak tree impacts, record of treatment, and protection methods shall be included in a monthly report to the city during active construction periods.

The City finds that Mitigation Measures BIO-5(a) and BIO-5(b) are feasible, are adopted, and will further reduce impacts to protected trees. Accordingly, the City finds that, pursuant to Public Resources Code section 21081(a)(1) and State CEQA Guidelines section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project that mitigate or avoid the potentially significant impacts of the proposed project to protected trees, as identified in the EIR. Therefore, impacts are considered less than significant. Mitigation measures will further reduce impacts to protected trees. (Draft EIR, p. IV.C-31 to IV.C-34.)

6. Impact BIO-6: The project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. This impact would be less than significant with mitigation (Class II).

Mitigation: Implement Mitigation Measures BIO-5(a) and BIO-5(b). Implementation of Mitigation Measures BIO-5(a) and BIO-5(b) would reduce impacts associated with conflicts with the City’s adopted Oak Tree Ordinance to a less-than-significant level (Class II).

The City finds that Mitigation Measures BIO-5(a) and BIO-5(b) are feasible, are adopted, and will further reduce impacts regarding compliance with the City’s Oak Tree Ordinance. Accordingly, the City finds that, pursuant to Public Resources Code section 21081(a)(1) and State CEQA Guidelines section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project that mitigate or avoid the potentially significant impacts of the proposed project regarding compliance with the City’s Oak Tree Ordinance, as identified in the EIR. Therefore, impacts are considered less than significant. Mitigation measures will further reduce impacts regarding compliance with the City’s Oak Tree Ordinance. (Draft EIR, p. IV.C-34.)

7. Cumulative Biological Resource Impacts: Past, present, and reasonably foreseeable projects in and around the city would incrementally contribute to the trend of conversion of the city from undeveloped to developed uses, with resultant loss of open space and habitat, loss of City-protected oak trees, and citywide increases in impervious surfaces and pollutant loading in the Salinas River watershed, night light, noise, and traffic associated with such development. These changes would both directly and indirectly affect sensitive habitats and wildlife species. Open space and habitat support native wildlife species, many of which cannot survive in, or do not adapt to, the noise and disturbance associated with residential and urban developments. Species that tolerate developed, landscaped, and disturbed sites include aggressive, non-native species that further displace native plants and wildlife, or may prey upon native species. The project, both directly and indirectly, would contribute to the gradual reduction of native habitats (including sensitive habitats), loss of native plant species diversity and populations, and reduction in and potential loss of native wildlife diversity and populations.

Cumulative impacts to biological resources are addressed on a project-by-project basis through site-specific investigations and surveys as well as the development of the assessment of potential impacts and implementation of appropriate mitigation. As with the project, other cumulative development within the city that would result in potential impacts to biological resources would be subject to
applicable General Plan goals and policies and would be required to incorporate project-specific mitigation measures to implement these policies. Cumulative development outside of the city limits that would result in potential impacts to biological resources would be subject to applicable County of San Luis Obispo goals and policies and would be required to incorporate project-specific mitigation measures to implement these policies.

Implementation of the mitigation measures would reduce project-level impacts to biological resources to a less-than-significant level. In particular, Mitigation Measures BIO-1(a), BIO-2(b), and BIO-5(a) require compensatory mitigation for impacts to loss of suitable habitat for the federally and state-listed SJKF, wetland areas and drainages, and protected oak trees, respectively. These mitigation measures require mitigation to occur in appropriate locations specific to the resources being mitigated; for example, Mitigation Measure BIO-1(a) requires mitigation areas for SJKF be located in the SJKF corridor areas such as the San Luis Obispo County SJKF habitat area northwest of Highway 58. Compensatory mitigation for federally and state-listed species would provide replacement habitat three times greater than the area impacted for each species and the mitigation options would benefit species regionally and locally, fully offsetting the contribution of the Specific Plan to potential cumulative impacts. Therefore, with the implementation of required mitigation measures, the project’s contribution to cumulative impacts on sensitive species, habitats, and oak trees would not be cumulatively considerable and cumulative impacts would be less than significant with mitigation (Class II).

The City finds that Mitigation Measures BIO-1(a) through BIO-1(g), BIO2(a) through BIO-2(c), and BIO-5(a) and BIO-5(b) are feasible, are adopted, and will further reduce cumulative impacts to biological resources. Accordingly, the City finds that, pursuant to Public Resources Code section 21081(a)(1) and State CEQA Guidelines section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project that mitigate or avoid the potentially significant cumulative impacts of the proposed project to biological resources, as identified in the EIR. Therefore, impacts are considered less than significant. Mitigation measures will further reduce cumulative impacts to biological resources. (Draft EIR, p. IV.C-34 to IV.C-35.)

**E. CULTURAL RESOURCES AND TRIBAL CULTURAL RESOURCES**

1. **Impact CR-1:** Grading and construction activities have the potential to impact previously undiscovered subsurface archaeological, tribal cultural or historical resources, including unidentified human remains. Disturbance resulting from construction related, or earth-disturbing activities could destroy or damage unknown tribal and/or cultural resources. Impacts to these resources would be potentially significant. Mitigation measures would need to be implemented along with monitoring by a qualified archaeologist and Native American representatives if Native American resources are uncovered.

   **Mitigation:** No CRHR eligible properties have been identified within or adjacent to the Project area. However due to the potential for discovery of unknown archaeological resources, mitigation includes contingency measures in the event of discovery and monitoring. Based on implementation of mitigation measures and compliance with existing regulations, potential impacts would be less than significant with mitigation. (Class II). A cultural resource monitoring plan (CRMP) will be developed by the principal investigator in consultation with the Native American Tribes that identifies the locations and activities that require monitoring. The principal investigator shall inspect initial subsurface construction disturbance at locations that may harbor subsurface resources that were not identified on the site surface. The monitor(s) shall be on-site during initial earthmoving activities, including grading, trenching, vegetation removal, or other excavation activities as specified by the CRMP.
Mitigation Measure CUL-1 Cultural Resources Monitoring Plan and Qualified Principle Investigator/Native American Monitor. A qualified principal investigator, defined as an archaeologist who meets the Secretary of the Interior’s Standards for professional archaeology (hereafter qualified archaeologist), and a Native American monitor shall be retained to carry out all mitigation measures related to archaeological resources.

A cultural resource monitoring plan (CRMP) will be developed by the principal investigator in consultation with the Native American Tribes that identifies the locations and activities that require monitoring. The principal investigator shall inspect initial subsurface construction disturbance at locations that may harbor subsurface resources that were not identified on the site surface. The monitor(s) shall be on-site during initial earthmoving activities, including grading, trenching, vegetation removal, or other excavation activities as specified by the CRMP. The City finds that Mitigation Measure CUL-1 is feasible, is adopted, and will further reduce impacts to cultural and tribal cultural resources. Accordingly, the City finds that, pursuant to Public Resources Code section 21081(a)(1) and State CEQA Guidelines section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project that mitigate or avoid the potentially significant impacts of the proposed project to cultural and tribal cultural resources, as identified in the EIR. Therefore, impacts are considered less than significant. Mitigation measures will further reduce impacts to cultural and tribal cultural resources. (Draft EIR, p. IV.E-10 to IV.E-11.)

2. Cumulative Cultural and Tribal Cultural Resource Impacts: Cumulative development could contribute to the loss of historical resources, archeological resources, and tribal cultural resources. This project would not directly contribute to the loss of any known historical resources. Potential impacts stemming from cumulative development in the vicinity of the BSP should be evaluated on a site-specific basis, and be subject to all applicable federal, state, and local laws as determined by the CRMP. As no CRHR eligible properties or archaeological sites have been identified within the Project area, along with mitigation measures to mitigate impacts to unknown subsurface resources, the proposed Project would not result in a cumulatively considerable significant impact to cultural resources.

The City finds that Mitigation Measure CUL-1 is feasible, is adopted, and will further reduce cumulative impacts to cultural and tribal cultural resources. Accordingly, the City finds that, pursuant to Public Resources Code section 21081(a)(1) and State CEQA Guidelines section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project that mitigate or avoid the potentially significant cumulative impacts of the proposed project to cultural and tribal cultural resources, as identified in the EIR. Therefore, impacts are considered less than significant. Mitigation measures will further reduce cumulative impacts to cultural and tribal cultural resources. (Draft EIR, p. IV.E-11.)

F. ENERGY

1. Impact E-2: The project would not be consistent with the City’s Climate Action Plan energy efficiency measures. The city’s CAP and General Plan contain measures intended to increase energy efficiency and expand the use of renewable energy. The project would incorporate features to reduce energy consumption as required by the 2019 Building Energy Efficiency Standards and CALGreen. Therefore, the project would be consistent with Goal C-7 and Policy C-2B of the General Plan. However, the proposed Specific Plan does not include all applicable “mandatory” measures, including Measures E-5, TL-1, TL-2, TL-3, W-1, and T-1, which focus on energy-efficient lighting, bicycle parking and amenities, pedestrian access and safety, public transit, and water efficiency. Therefore, the project would be inconsistent with the city’s CAP, resulting in a conflict with a local
plan related to energy efficiency. This impact would be less than significant with mitigation incorporated.

Mitigation: Mitigation Measure GHG-2, discussed above, would require the project to incorporate all “mandatory” measures in the City’s CAP. Would require the project to incorporate all “mandatory” measures in the city’s CAP as well as additional measures to promote zero net energy (ZNE) buildings, including the prohibition of natural-gas-fired appliances for proposed residential development. Proposed non-residential land uses would also be designed and built to promote the use of electrically-powered building mechanical equipment in support of future ZNE goals for non-residential structures. Therefore, Mitigation Measure GHG-2 would ensure that the project would be consistent with the city’s CAP, and impacts would be less than significant.

The City finds that Mitigation Measure GHG-2 is feasible, is adopted, and will further reduce impacts regarding conflicts with a state or local plan for renewable energy or energy efficiency. Accordingly, the City finds that, pursuant to Public Resources Code section 21081(a)(1) and State CEQA Guidelines section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project that mitigate or avoid the potentially significant impacts of the proposed project regarding energy efficiency, as identified in the EIR. Therefore, impacts are considered less than significant. Mitigation measures will further reduce impacts regarding energy efficiency. (Draft EIR, p. IV.O-12 to IV.O-13.)

2. Cumulative Energy Impacts: The geographic scope for energy consumption is San Luis Obispo County. This geographic scope is appropriate because the smallest scale at which energy consumption information is readily available is the county level. Cumulative development in San Luis Obispo County would increase demand for energy resources. However, new iterations of the California Building Energy Efficiency Standards and CALGreen would require increasingly more efficient appliances and building materials that reduce energy consumption in new development. In addition, vehicle fuel efficiency is anticipated to continue improving through implementation of the existing Pavley regulations under AB 1493, and implementation of the San Luis Obispo Council of Governments 2019 Regional Transportation Plan would reduce per capita VMT in San Luis Obispo County. Cumulative development in San Luis Obispo County will also be required to be consistent with applicable provisions of the SLOCOG Regional Transportation Plan/Sustainable Communities Strategy and with the San Luis Obispo County EnergyWise Plan, which implements the county’s greenhouse gas emissions reduction goals established in the County General Plan Conservation and Open Space Element.

Specific Plan area development would be constructed in accordance with the California Building Energy Efficiency Standards and CALGreen and would include energy-saving features that would reduce the potential for wasteful, inefficient, and unnecessary consumption of energy resources. The project and its associated objectives are also designed to address statewide cumulative planning efforts directed at reducing the wasteful consumption of vehicle fuels. The legislature has adopted findings that “the lack of housing, including emergency shelters, is a critical problem that threatens the economic, environmental, and social quality of life in California… (3) Among the consequences of those actions are…. reduced mobility, urban sprawl, excessive commuting, and air quality deterioration” (Gov. Code Section 65589.5[a]). The Legislature also recently adopted findings that “California has a housing supply and affordability crisis of historic proportions. The consequences of failing to effectively and aggressively confront this crisis are hurting millions of Californians, robbing future generations of the chance to call California home, stifling economic opportunities for workers and businesses, worsening poverty and homelessness, and undermining the state’s environmental and climate objectives” (Gov. Code Section 65589.5[a][2][A][AB 3194 (2018)]. The Specific Plan would provide additional housing in Paso Robles, which would reduce urban sprawl and excessive commuting, thereby minimizing the potential for the project to contribute to the statewide cumulative energy impact related to the wasteful consumption of vehicle fuels. However, the project would be
inconsistent with the city’s CAP, which was adopted to reduce the cumulative impact of energy consumption in Paso Robles, and implementation of Mitigation Measure GHG-2 would be required. Therefore, with incorporation of mitigation, the project would not have a cumulatively considerable contribution to a significant cumulative impact related to the wasteful, inefficient, and unnecessary consumption of energy resources (Class II).

The City finds that Mitigation Measure GHG-2 is feasible, is adopted, and will further reduce cumulative energy impacts. Accordingly, the City finds that, pursuant to Public Resources Code section 21081(a)(1) and State CEQA Guidelines section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project that mitigate or avoid the potentially significant cumulative energy impacts of the proposed project, as identified in the EIR. Therefore, impacts are considered less than significant. Mitigation measures will further reduce cumulative energy impacts. (Draft EIR, p. IV.O-13 to IV.O-14.)

G. GEOLOGY AND SOILS

1. Impact GEO-2: Portions of the project site contain soils that are highly erodible. On-site development may increase soil erosion on the project site during and after construction. Excavation and grading would expose of ground surfaces throughout the project site and could result in erosion of soils and sedimentation. During grading and soil storage, there is the potential for soil migration offsite via wind entrainment and/or water erosion. Projects that disturb one or more acres of soil, or projects that are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the Construction General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit Order 2009-0009-DWQ). Construction activity subject to this permit includes clearing, grading and disturbances to the ground such as stockpiling, or excavation. The Construction General Permit requires preparation of a Stormwater Pollution Prevention Plan (SWPPP), which includes a menu of erosion and sediment control BMPs to be selected and implemented based on the phase of construction and the weather conditions to effectively control erosion and sediment using the Best Available Technology Economically Achievable and Best Conventional Pollutant Control Technology (BAT/BCT). Erosion control BMPs are designed to prevent erosion, whereas sediment controls are designed to trap sediment once it has been mobilized. BMPs that may be implemented during construction through the city-issued grading permit and/or SWPPP include the use of geotextiles and mats, temporary drains and swales, silt fences and sediments traps. Erosion control practices may include the use of drainage controls such as down drains, detention ponds, filter berms, or infiltration pits; removal of any sediment tracked offsite within the same day that it is tracked; containment of polluted runoff onsite; use of plastic covering to minimize erosion from exposed areas; and restrictions on the washing of construction equipment. Compliance with the SWPPP and associated BMPs would reduce potential erosion induced siltation of creeks and other drainages. This impact would be significant but mitigable (Class II).

Mitigation: Mitigation Measure GEO-2 would be required to reduce soil erosion on the project site. Implementation of Mitigation Measure GEO-2 and applicable erosion control BMPs in the city-issued grading permit and SWPPP would reduce impacts associated with the short-term exposure of graded soils and potential for soil erosion and sedimentation into drainages resulting from buildout of the project to a less than significant level.

— Mitigation Measure GEO-2 Moisture Conditioning and Fill Impaction. The recommendations of the Geotechnical Report, including those pertaining to grading and soils compaction operations shall be incorporated into the project plans and specifications.

The City finds that Mitigation Measure GEO-2 is feasible, is adopted, and will further reduce impacts regarding soil erosion. Accordingly, the City finds that, pursuant to Public Resources Code section
21081(a)(1) and State CEQA Guidelines section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project that mitigate or avoid the potentially significant impacts of the proposed project regarding soil erosion, as identified in the EIR. Therefore, impacts are considered less than significant. Mitigation measures will further reduce impacts regarding soil erosion. (Draft EIR, p. IV.A-15 to IV.A-16.)

2. Impact GEO-3: Expansive soils are present in the Specific Plan area. Development on expansive soils could damage slabs and foundations. This impact would be significant but mitigable.

   **Mitigation:** Mitigation Measures GEO-2 and GEO-3 would be required to reduce impacts of expansive soils on the project:

   - **Mitigation Measure GEO-3 Geotechnical Report Measures.** The recommendations of the Geotechnical Report, including those pertaining to earthwork and grading and intended to reduce impacts from expansive soils, shall be incorporated into the project plans and specifications.

   The City finds that Mitigation Measures GEO-2 and GEO-3 are feasible, are adopted, and will further reduce impacts regarding expansive soils. Accordingly, the City finds that, pursuant to Public Resources Code section 21081(a)(1) and State CEQA Guidelines section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project that mitigate or avoid the potentially significant impacts of the proposed project regarding expansive soils, as identified in the EIR. Therefore, impacts are considered less than significant. Mitigation measures will further reduce impacts regarding soil erosion. (Draft EIR, p. IV.A-16 to IV.A-17.)

3. Impact GEO-4: Paleontological resources may be present in geologic units with high paleontological potential that underlay the BSP planning area. Ground-disturbing activities could damage resources that may be present below the surface. This impact would be significant but mitigable (Class II).

   **Mitigation:** Mitigation Measure GEO-4(a) and 4(b) would be required to reduce potential impacts to paleontological resources:

   - **Mitigation Measure GEO-4(a) Worker Paleontological Resources Awareness Session.** A qualified city-approved paleontologist selected by the Owner/Applicant who meets the standards of the Society of Vertebrate Paleontology (SVP) shall develop a worker awareness program to educate all workers regarding the protection of any paleontological resources that may be discovered during project development, as well as appropriate procedures to enact should paleontological resources be discovered. The qualified paleontologist shall develop appropriate training materials including a summary of geologic units present at the development site, potential paleontological resources that may be encountered during development, and worker attendance sheets to record workers’ completions of the awareness session. The worker awareness session for paleontological resources shall occur prior to project development, and as new employees are added to the project site workforce. The qualified consultant shall provide awareness session sign-in sheets documenting employee attendance to the city for review as requested.

   - **Mitigation Measure GEO-4(b) Paleontological Monitoring and Handling of Resources Inadvertently Discovered During Grading.** If unrecorded paleontological resources are uncovered during ground disturbance or construction activities, the Owner/Applicant, under the direction of the qualified consultant identified in Mitigation Measure GEO-3(a) shall:

     a. A Project Paleontologist (meeting SVP standards) will prepare a Paleontological Resources Monitoring and Mitigation Plan (PRMMP). This plan will address specific
monitoring and mitigation and comply with the recommendations of the SVP, and shall include:

i. Temporarily halt construction or excavation activities within 50 feet of the find and redirect activity to other work areas;

ii. Immediately notify the city regarding the resource and redirected grading activity; and

iii. Obtain the services of a professional paleontologist who shall assess the significance of the find and provide recommendations as necessary for its proper disposition for review and approval by the City of Paso Robles. All significance assessment and mitigation of impacts to the paleontological resource and verification shall be reviewed by the City of Paso Robles prior to resuming grading in the area of the find. Mitigation may involve preservation in place or documentation and excavation of the resource.

The City finds that Mitigation Measures GEO-4(a) and GEO-4(b) are feasible, are adopted, and will further reduce impacts to paleontological resources. Accordingly, the City finds that, pursuant to Public Resources Code section 21081(a)(1) and State CEQA Guidelines section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project that mitigate or avoid the potentially significant impacts of the proposed project on paleontological resources, as identified in the EIR. Therefore, impacts are considered less than significant. Mitigation measures will further reduce impacts to paleontological resources. (Draft EIR, p. IV.A-17 to IV.A-18.)

H. HAZARDS AND HAZARDOUS MATERIALS

1. Impact HAZ-4: Residual pesticides and agricultural chemicals in soil due to historical use of pesticides and other agricultural chemicals onsite could create a hazard to construction workers during the construction phase of the project. Ground disturbing activities during construction could expose construction workers and neighboring residents to residual agricultural chemicals in on-site soil via direct contact or inhalation of dust particles. Improper handling and disposal of contaminated soils could result in a health risk to people which would be potentially significant unless mitigation is incorporated. Impacts would be significant but mitigable (Class II).

   a. Mitigation: Mitigation Measure HAZ-4 is required to reduce potential for exposure to agricultural chemicals to a less than significant level.

      – Mitigation Measure HAZ-4 Soil Sampling and Remediation. Prior to issuance of any grading permits or site disturbance/tract improvements, a contaminated soil assessment shall be completed in the portions of land to be graded for development. Soil samples shall be collected under the supervision of a professional geologist or environmental professional to determine the presence or absence of contaminated soil in these areas. The sampling density shall be in accordance with guidance from the County of San Luis Obispo Environmental Health Services Division, so as to define the volume of soil that may require remediation. Laboratory analysis of soil samples shall be analyzed for the presence of organochlorine pesticides, in accordance with EPA Test Method SW8081A, and heavy metals in accordance with EPA Test Methods 6010B and 7471A. If soil sampling indicates the presence of pesticides or heavy metals exceeding applicable environmental screening levels, the soil assessment shall identify the volume of contaminated soil to be excavated.

      If concentrations of contaminants exceed EPA action levels and therefore warrant remediation, the applicant shall prepare a Contaminated Soils Assessment and
Remediation Plan. The plan shall identify the contaminant, the volume of contaminated soil, treatment or remediation methods, and regulatory permits required to complete the remediation. Remediation activities shall require implementation of all applicable project construction requirements, including other construction-related mitigation measures identified in this EIR. All necessary reports, regulations and permits shall be followed to achieve cleanup of the site. The contaminated materials shall be remediated under the supervision of an environmental consultant licensed to oversee such remediation and under the direction of the lead oversight agency. The remediation program shall also be approved by a regulatory oversight agency, such as the County of San Luis Obispo Environmental Health Services Division, the RWQCB, or DTSC. All proper waste handling and disposal procedures shall be followed. Upon completion of the remediation, the environmental consultant shall prepare a report summarizing the project, the remediation approach implemented, and the analytical results after completion of the remediation, including all waste disposal or treatment manifests.

The City finds that Mitigation Measure HAZ-4 is feasible, is adopted, and will further reduce impacts regarding exposure to agricultural chemicals. Accordingly, the City finds that, pursuant to Public Resources Code section 21081(a)(1) and State CEQA Guidelines section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project that mitigate or avoid the potentially significant impacts of the proposed project regarding exposure to agricultural chemicals, as identified in the EIR. Therefore, impacts are considered less than significant. Mitigation measures will further reduce impacts regarding exposure to agricultural chemicals. (Draft EIR, p. IV.J-15 to IV.J-16.)

I. LAND USE AND PLANNING

1. Impact LU-2: The project would be consistent with applicable City policies and standards, and the land use strategy in SLOCOG’s 2019 Regional Transportation Plan. The project would be consistent with applicable city General Plan policies. The Specific Plan and related actions would facilitate development of the Specific Plan area consistent with the city’s General Plan. The project site is located within an existing community and is consistent with the General Plan land use designations for the site. The Specific Plan area borders residential uses on the west and north and would extend urban development in this area to the eastern boundary of the city. As a result, the project would allow for efficient development that minimizes increases in VMT and associated motor vehicle GHG emissions. The project would also provide bikeways, pedestrian, and transit connections throughout the Specific Plan area, which contributes to a reduction in the amount of vehicle travel and associated GHG emissions and provides for project consistency with the regional land use strategy in SLOCOG’s 2019 RTP. With implementation of the mitigation measures included throughout the EIR and referenced in the statements of consistency/conflict in Table IV.L-3 of the Draft EIR, the project would be consistent with the goals and policies in the city’s General Plan and the land use strategy in the 2019 RTP. This impact would be less than significant with mitigation (Class II).

   Mitigation: This impact would not require additional mitigation measures beyond applicable measures included in other section of the EIR, including those referenced in the statements of consistency/conflict in Table IV.L-3 of the Draft EIR.

   Implementation of the mitigation measures referenced in the statements of consistency/conflict in Table IV.L-3 of the Draft EIR and in these Findings would reduce the project’s potential impacts resulting from potential inconsistencies with the applicable land use plans, policies, or regulations to a less than significant level.
J. NOISE

1. Impact N-2: Future development in the Specific Plan area may include stationary sources of noise that could result in noise levels that would exceed the City’s applicable noise standards at existing noise-sensitive land uses. Noise associated with proposed residential dwellings would expose other nearby residences (both existing and new residential units within the Specific Plan area) to increases in ambient noise levels. Noise typically associated with residential development includes lawn and garden equipment, voices, air conditioning equipment, and amplified music. This impact would be significant but mitigable (Class II).

**Mitigation:** Mitigation Measure N-2 would ensure planned residential, commercial, and school uses in the Specific Plan area comply with the city’s noise exposure standards for stationary noise sources at existing noise-sensitive land uses. In accordance with Mitigation Measure N-2, acoustical assessments would be required for new development in the BSP planning area where commercial land uses would be located within 825 feet of existing noise-sensitive receptors. Noise reduction measures, such as the incorporation of setbacks, sound barriers, berms, hourly limitations, and/or equipment enclosures, would be required to demonstrate compliance with the city’s maximum allowable noise exposure standards for stationary noise sources. With implementation of the required mitigation, this impact would be less than significant.

**Mitigation Measure N-2 Acoustical Assessments for Stationary Noise Sources.** The BSP shall include a policy or development standard that requires applicants for new development in the BSP Planning area to provide an acoustical assessment prepared by a qualified professional where new commercial land uses are within 825 feet of existing noise-sensitive land uses. The acoustical assessments shall evaluate potential noise impacts attributable to proposed Project, as well as, the compatibility of proposed land uses in comparison to applicable City noise standards for stationary noise sources. Where the acoustical analysis determines that stationary-source noise levels would exceed applicable city noise standards, noise reduction measures shall be incorporated sufficient to reduce operational noise levels below applicable noise standards. Such measures may include but are not limited to, the incorporation of setbacks, sound barriers, berms, hourly limitations, or equipment enclosures.

The City finds that Mitigation Measure N-2 is feasible, is adopted, and will further reduce impacts regarding permanent increase in ambient noise levels. Accordingly, the City finds that, pursuant to Public Resources Code section 21081(a)(1) and State CEQA Guidelines section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project that mitigate or avoid the potentially significant impacts of the proposed project regarding exposure to noise, as identified in the EIR. Therefore, impacts are considered less than significant. Mitigation measures will further reduce impacts regarding exposure to noise. (Draft EIR, p. IV.H-15 to IV.H-17.)

2. Impact N-3: The project would result in temporary noise in the Specific Plan area vicinity during the construction phase. Construction noise levels could potentially exceed 80 dBA Leq, which would result in a potentially significant temporary noise impact. This impact would be significant but mitigable.

**Mitigation:** Mitigation Measure N-3 requires implementation of Best Management Practices (BMPs) for construction activities to reduce the temporary noise increases associated with project construction. With the implementation of Mitigation Measure N-3, construction activities would be limited to the less noise-sensitive daytime hours. The proper maintenance of construction equipment and use of manufacturer recommended mufflers and engine shrouds would reduce equipment noise levels by approximately 10 dB. The installation of temporary noise barriers,
where required, would decrease noise levels by approximately 5 to 10 dB. With the implementation of Mitigation Measure N-3 this impact would be less than significant.

— Mitigation Measure N-3 Construction Equipment Noise Best Management Practices.

For all construction activities in the Specific Plan area, noise attenuation techniques shall be employed to ensure that noise levels are minimized. Such techniques shall include:

a. Unless otherwise provided for in a validly issued permit or approval, noise-generating construction activities shall be limited to the hours of 7:00 AM and 7:00 PM. Noise-generating construction activities shall not occur on Sundays or federal holidays.

b. Construction equipment shall be properly maintained and equipped with noise reduction intake and exhaust mufflers and engine shrouds, in accordance with manufacturers’ recommendations. Equipment-engine shrouds shall be closed during equipment operation.

c. Equipment shall be turned off when not in use for an excess of five minutes, except for equipment that requires idling to maintain performance.

d. A public liaison shall be appointed for project construction and shall be responsible for addressing public concerns about construction activities, including excessive noise. The liaison shall work directly with the construction contractor to ensure implementation of the appropriate noise reduction measures to address public concerns. Signage shall be posted at the site perimeter identifying the public liaison’s contact information.

e. Virginia Peterson Elementary School shall be provided written notification a minimum of two weeks prior to beginning construction when construction activities are anticipated to occur within 400 feet of the school. The notification shall identify the anticipated location, dates and hours of construction; as well as, the contact information for the public liaison.

f. Where necessary, temporary noise barriers shall be installed.

g. Staging and queuing areas shall be located at the furthest distance possible from nearby noise sensitive land uses identified in the project area at the time of construction.

The City finds that Mitigation Measure N-3 is feasible, is adopted, and will further reduce impacts regarding temporary construction noise. Accordingly, the City finds that, pursuant to Public Resources Code section 21081(a)(1) and State CEQA Guidelines section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project that mitigate or avoid the potentially significant impacts of the proposed project regarding temporary construction noise, as identified in the EIR. Therefore, impacts are considered less than significant. Mitigation measures will further reduce impacts regarding exposure to temporary construction noise. (Draft EIR, p. IV.H-17 to IV.H-20.)

3. Cumulative Noise Impacts: Planned, proposed, and approved projects in and around the city would expose additional people and property to noise and groundborne vibration. Noise impacts from individual projects would depend upon the location, type, and size of development and the proposed uses, and would be primarily addressed through compliance with the city’s land use compatibility requirements and enforcement of the city’s maximum noise exposure standards for stationary noise sources. Cumulatively, increasing traffic noise is the primary noise concern associated with continued long term development in Paso Robles. The project’s contribution to cumulative traffic noise in the BSP planning area vicinity has been determined to be less than significant. Therefore, the project’s overall contribution to long-term cumulative noise impacts would not be cumulatively considerable. Construction and operation of other projects in the vicinity of the BSP planning area may generate
noise levels in excess of existing measured noise levels and may affect sensitive receptors in the BSP planning area vicinity. The nearest residences are located adjacent to and both west and north of the BSP planning area. However, construction and operational noise is localized and generally does not contribute to cumulative noise impacts. Implementation of Mitigation Measure N-3 would reduce construction noise associated with buildout of the project and would ensure that the project’s contribution to cumulative noise impacts in the vicinity would not be cumulatively considerable.

The City finds that Mitigation Measure N-3 is feasible, is adopted, and will further reduce cumulative noise impacts. Accordingly, the City finds that, pursuant to Public Resources Code section 21081(a)(1) and State CEQA Guidelines section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project that mitigate or avoid the potentially significant cumulative noise impacts of the proposed project, as identified in the EIR. Therefore, impacts are considered less than significant. Mitigation measures will further reduce cumulative noise impacts. (Draft EIR, p. IV.H-21.)

K. TRANSPORTATION

1. Impact TR-1: Construction-related traffic would not result in a significant increase in transportation hazards in the area with the implementation of a Traffic Control Plan (Class II). The City requires the preparation of a Traffic Control Plan for any construction work that may impact traffic or pedestrian and bicycle facilities or result in the closure of an alley or public roadway. Prior to construction, Traffic Control Plans would be reviewed and approved by the City’s Emergency Services Department and City Engineer, which would address construction-related emergency access and detour routes for vehicles, bicyclists, and pedestrians. Preparation and implementation of Traffic Control Plans for construction in the Specific Plan area would ensure hazards related to construction traffic and equipment would be less than significant.

   Mitigation: Mitigation Measure TR-1 would reduce impacts during construction, including impacts to Niblick Road during the AM and PM peak hours, to less than significant.

   Mitigation Measure T-1 Traffic Control Plan. The project applicant shall prepare a Traffic Control Plan for review and approval by the City Emergency Services Department and City Engineer. The Traffic Control Plan shall include provisions to prohibit construction traffic during the AM and PM peak hours on Niblick Road.

The City finds that Mitigation Measure TR-1 is feasible, is adopted, and will further reduce impacts related to transportation hazards. Accordingly, the City finds that, pursuant to Public Resources Code section 21081(a)(1) and State CEQA Guidelines section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project that mitigate or avoid the potentially significant impacts of the proposed project related to transportation hazards, as identified in the EIR. Therefore, impacts are considered less than significant. Mitigation measures will further reduce impacts related to transportation hazards. (Draft EIR, p. IV.G-30.)

2. Impact TR-3: Under Existing Plus Project conditions, the project would result in an unacceptable LOS at five City stop-controlled intersections. The project’s impacts would be significant but mitigable (Class II).

   Mitigation: With the implementation of Mitigation Measure TR-3(a) and TR-3(b), all intersections operating at unacceptable LOS as a result of the project under existing conditions would operate at pre-project conditions or better. Implementation of mitigation measures that require off-site improvements would generally not result in significant residual impacts, as off-site improvements would occur within existing roadway rights-of-way, or within urbanized
paved/landscaped areas immediately adjacent to existing roadway rights-of-way. Off-site transportation system improvements would not involve construction of any new residential units or commercial structures. During construction of transportation system improvements potential issue areas that may be temporarily affected would include air quality, cultural resources, hazards and hazardous materials, water quality, noise and transportation. Construction-related environmental impacts would be mitigated through compliance with City and Caltrans permitting and construction monitoring requirements and standard San Luis Obispo County Air Pollution Control District (SLOAPCD) dust and diesel emission control measures. Potential long-term impacts of transportation system improvements would include potential land use impacts associated with acquisition of additional right-of-way, demolition of existing structures, or displacement of residences.

- **Mitigation Measure T-3(a) Fair Share Funding for Intersection (#6) Improvements.**
  The project shall contribute its equitable share to fund the following transportation improvements:
  a. Golden Hill Road/Union Road (Intersection #6): Prior to building permit final for each unit, the applicant shall contribute their fair-share amount through the City’s TIF program for the installation of a single-lane roundabout at Golden Hill Road/Union Road.

- **Mitigation Measure TR-3(b) Implementation of Improvements for Intersections (#12, #13, #18, #20)**
  The project shall construct the following improvements to mitigate impacts to these intersections:
  a. Creston Road/Stoney Creek Road (Intersection #12): The applicant shall install a traffic signal at Creston Road/Stoney Creek Road. The applicant shall conduct an intersection operations analysis prior to the issuance of the 554th building permit and install the signal if warranted at that time. If not warranted at the 554th building permit, the operations analysis shall determine at what unit count prior to the 674th unit the signal is warranted. The signal shall be installed prior to the issuance of the 674th building permit. If the signal is installed by the Olsen-South Chandler Ranch Specific Plan, then the applicant shall pay its fair share of the signal installation.
  b. Creston Road/Meadowlark Road (Intersection #13): The applicant shall install a traffic signal at Creston Road/Meadowlark Road. The applicant shall conduct an intersection operations analysis prior to the issuance of the 554th building permit and install the signal if warranted at that time. If not warranted at the 554th building permit, the operations analysis shall determine at what unit count prior to the 911th unit the signal is warranted. The signal and associated improvements shall be installed prior to the issuance of the 911th building permit. If the signal is installed by the Olsen-South Chandler Ranch Specific Plan, then the applicant shall pay its fair share of the signal installation.
  c. South River Road/Charolais Road (Intersection #20): The applicant shall construct a single-lane roundabout at South River Road/Charolais Road. The applicant shall conduct an intersection operations analysis prior to the issuance of the 250th building permit and install the signal if warranted at that time. If not warranted at the 250th building permit, the operations analysis shall determine at what unit count prior to the 554th unit the signal is warranted. The single-lane roundabout shall be installed prior to the issuance of the 554th building permit.
d. South River Road/Riverbank Lane (#18): The applicant shall install two way left turn lane striping, between Riverbank Lane and Serenade Lane, at South River Road and Riverbank Lane. The improvement shall be installed with the South River Road/Charolais Road (Intersection #20) improvements.

The City finds that Mitigation Measures TR-3(a) and TR-3(b) are feasible, are adopted, and will further reduce impacts related to transportation and traffic. Accordingly, the City finds that, pursuant to Public Resources Code section 21081(a)(1) and State CEQA Guidelines section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project that mitigate or avoid the potentially significant impacts of the proposed project related to transportation and traffic, as identified in the EIR. Therefore, impacts are considered less than significant. Mitigation measures will further reduce impacts related to transportation and traffic. (Draft EIR, p. IV.G-38 to IV.G-41, Final EIR, p. IV.G-40.)

3. Impact TR-4: Under Existing Plus Project conditions, the project would result in queueing deficiencies at three City-controlled intersections. The Project’s Impacts would be significant but mitigable (Class II).

Mitigation: Implement Mitigation Measure TR-3(a) Fair Share Funding for Intersection (#6) Improvements. With implementation of Mitigation Measures TR-3(a), TR-4(a), and TR-4(b), unacceptable intersection queues resulting from project-added vehicle trips under Existing Plus Project conditions at Golden Hill Road/Union Road (#6), 13th Street/Riverside Avenue (#7), and 13th Street/Paso Robles Street (#8) would operate at pre-project conditions or better. Implementation of mitigation measures that require off-site improvements would generally not result in significant residual impacts, as off-site improvements would occur within existing roadway rights-of-way or within urbanized paved/landscaped areas immediately adjacent to existing roadway rights-of-way. Off-site transportation system improvements would not involve construction of any new residential units or commercial structures. During construction of transportation system improvements, potential issue areas that may be temporarily affected would include air quality, cultural resources, hazards and hazardous materials, water quality, noise, and transportation. Construction-related environmental impacts would be mitigated through compliance with City and Caltrans permitting and construction monitoring requirements and standard SLOAPCD dust and diesel emission control measures. Potential long-term impacts of transportation system improvements would include potential land use impacts associated with acquisition of additional right-of-way, demolition of existing structures, or displacement of residences.

- Mitigation Measure TR-4(a) Implementation of Improvements at 13th Street/Riverside Avenue (#7). The applicant shall implement signal timing optimization (e.g., adaptive signal timing improving the efficiency of the corridor operations) at 13th Street/Riverside Avenue. The applicant shall provide westbound right-turn and northbound right-turn overlap phases. The applicant shall coordinate signal timing with the 13th Street/Riverside Avenue and River Road/Creston Road intersections to shorten queues to the extent possible at all three intersections. Improvements at this intersection are not eligible for TIF Program credits.

- TR-4(b) Implementation of Improvements at 13th Street/Paso Robles Street (#8). The applicant shall implement signal timing optimization (e.g., adaptive signal timing improving the efficiency of the corridor operations) at 13th Street/Paso Robles Street.
The applicant shall evaluate and construct the extension of the northbound right-turn lane. The applicant shall coordinate signal timing with the 13th Street/Riverside Avenue and River Road/Creston Road intersections to shorten queues to the extent possible at all three intersections. Improvements at this intersection are not eligible for TIF Program credits.

The City finds that Mitigation Measures TR-3(a), TR-4(a) and TR-4(b) are feasible, are adopted, and will further reduce impacts related to transportation and traffic. Accordingly, the City finds that, pursuant to Public Resources Code section 21081(a)(1) and State CEQA Guidelines section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project that mitigate or avoid the potentially significant impacts of the proposed project related to transportation and traffic, as identified in the EIR. Therefore, impacts are considered less than significant. Mitigation measures will further reduce impacts related to transportation and traffic. (Draft EIR, p. IV.G-41 to IV.G-42.)

4. Impact TR-10: Under Near Term Plus Project Conditions, the project would result in an unacceptable LOS at Five City-controlled intersections. The project’s impacts would be significant but mitigable (Class II).

Mitigation: With the implementation of Mitigation Measures TR-3(b) and TR-10, all intersections operating at unacceptable LOS as a result of the project under near-term conditions would operate at pre-project conditions or better. Implementation of mitigation measures that require off-site improvements would generally not result in significant residual impacts, as off-site improvements would occur within existing roadway rights-of-way, or within urbanized paved/landscaped areas immediately adjacent to existing roadway rights-of-way. Off-site transportation system improvements would not involve construction of any new residential units or commercial structures. During construction of transportation system improvements, potential issue areas that may be temporarily affected would include air quality, cultural resources, hazards and hazardous materials, water quality, noise, and transportation. Construction-related environmental impacts would be mitigated through compliance with City and Caltrans permitting and construction monitoring requirements and standard SLOAPCD dust and diesel emission control measures. Potential long-term impacts of transportation system improvements would include potential land use impacts associated with acquisition of additional right-of-way, demolition of existing structures, or displacement of residences.

- Mitigation Measure T-10. Implementation of Improvements at Creston Road/Charolais Road (#14). The applicant shall evaluate and install an all-way stop control at Creston Road/Charolais Road.

The City finds that Mitigation Measures TR-3(b) and TR-10 are feasible, are adopted, and will further reduce impacts related to transportation and traffic. Accordingly, the City finds that, pursuant to Public Resources Code section 21081(a)(1) and State CEQA Guidelines section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project that mitigate or avoid the potentially significant impacts of the proposed project related to transportation and traffic, as identified in the EIR. Therefore, impacts are considered less than significant. Mitigation measures will further reduce impacts related to transportation and traffic. (Draft EIR, p. IV.G-53 to IV.G-54.)
5. Impact TR-11. Under Near Term Plus Project conditions, the project would result in queuing deficiencies at Three City-controlled intersections. The project’s impacts would be significant but mitigable (Class II).

Mitigation: Mitigation Measure TR-11. Implement Mitigation Measure TR-4(a) Implementation of Improvements at 13th Street/Riverside Avenue (#7) and TR-4(b) Implementation of Improvements at 13th Street/Paso Robles Street (#8). With the implementation of Mitigation Measures TR-4(a), TR-4(b), and TR-11, unacceptable intersection queues resulting from project-added vehicle trips under Near Term Plus Project conditions at 13th Street/Riverside Avenue (#7), 13th Street/Paso Robles Street (#8), and Creston Road/Niblick Road (#11) would operate at pre-project conditions or better.

- Mitigation Measure T-10. Fair Share Funding for Intersection (#11) Improvements.
  The project shall contribute its equitable share to fund the following transportation improvements. Costs above and beyond the project’s equitable share shall be addressed through such options as fee credits, reimbursement agreements, or development agreements, based on city requirements.
  a. Creston Road/Niblick Road (#11): Prior to building permit final for each unit, the applicant shall contribute their fair-share amount through the City’s TIF program for the installation of a second southbound left-turn, southbound right-turn, and eastbound right-turn lanes. If the Olsen-South Chandler Ranch Specific Plan has not started construction of the improvements prior to the building permit final of the 500th Beechwood unit, the applicant shall construct these improvements.

The City finds that Mitigation Measures TR-4(a), TR-4(b) and TR-11 are feasible, are adopted, and will further reduce impacts related to transportation and traffic. Accordingly, the City finds that, pursuant to Public Resources Code section 21081(a)(1) and State CEQA Guidelines section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project that mitigate or avoid the potentially significant impacts of the proposed project related to transportation and traffic, as identified in the EIR. Therefore, impacts are considered less than significant. Mitigation measures will further reduce impacts related to transportation and traffic. (Draft EIR, p. IV.G-54 to IV.G-55.)

6. Impact TR-18: Under Cumulative Plus Project Condition, the project would result in an unacceptable LOS at Four City-Controlled intersections. The Project’s impacts would be Significant but Mitigable (Class II).

Mitigation: Implement Mitigation Measures TR-3(a).1, TR-3(b).1, TR-3(b).2, and TR-10. With the implementation of Mitigation Measures TR-3(a).1, TR-3(b).1, TR-3(b).2, and TR-10, all intersections operating at unacceptable LOS as a result of the project under cumulative conditions would operate at pre-project conditions or better. Implementation of mitigation measures that require off-site improvements would generally not result in significant residual impacts, as off-site improvements would occur within existing roadway rights-of-way, or within urbanized paved/landscaped areas immediately adjacent to existing roadway rights-of-way. Off-site transportation system improvements would not involve construction of any new residential units or commercial structures. During construction of transportation system improvements, potential issue areas that may be temporarily affected would include air quality, cultural resources, hazards and hazardous materials, water quality, noise, and transportation. Construction-related environmental impacts would be mitigated through compliance with City and Caltrans permitting and construction monitoring requirements and standard SLOAPCD dust and diesel emission control measures. Potential long-term impacts of transportation
system improvements would include potential land use impacts associated with acquisition of additional right-of-way, demolition of existing structures, or displacement of residences.

The City finds that Mitigation Measures TR-3(a).1, TR-3(b).1, TR-3(b).2 and TR-10 are feasible, are adopted, and will further reduce impacts related to transportation and traffic. Accordingly, the City finds that, pursuant to Public Resources Code section 21081(a)(1) and State CEQA Guidelines section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project that mitigate or avoid the potentially significant impacts of the proposed project related to transportation and traffic, as identified in the EIR. Therefore, impacts are considered less than significant. Mitigation measures will further reduce impacts related to transportation and traffic. (Draft EIR, p. IV.G-68 to IV.G-69.)

7. Impact TR-20: Under Cumulative Plus Project Conditions, The project would result in Queueing Deficiencies at Three City-Controlled intersections. Project impacts would be less than significant with mitigation (Class II).

Mitigation: Mitigation Measure TR-20 Implement Mitigation Measure TR-4(a) and TR-4(b). With the implementation of Mitigation Measure TR-4(a), TR-4(b), and TR-20, queueing deficiencies at all intersections as a result of the project under cumulative conditions would operate at pre-project conditions or better.

- Mitigation Measure T-20. Implementation of Improvements at North River Road/Creston Road (#9). The applicant shall implement signal timing optimization (e.g. adaptive signal timing improving the efficiency of the corridor operations) at North River Road/Creston Road. The applicant shall construct lane striping for a dedicated left-turn, through, and right-turn lane on the southbound intersection leg. This shall be done in conjunction with TR-4(a), and TR-4(b). Improvements at this intersection are not eligible for TIF Program credits.

The City finds that Mitigation Measures TR-4(a), TR-4(b) and TR-20 are feasible, are adopted, and will further reduce impacts related to transportation and traffic. Accordingly, the City finds that, pursuant to Public Resources Code section 21081(a)(1) and State CEQA Guidelines section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project that mitigate or avoid the potentially significant impacts of the proposed project related to transportation and traffic, as identified in the EIR. Therefore, impacts are considered less than significant. Mitigation measures will further reduce impacts related to transportation and traffic. (Draft EIR, p. IV.G-69 to IV.G-70, Final EIR, p. IV.G-72.)

8. Impact TR-28: Existing crossing signage at the school is not consistent with the current California Manual on Uniform Traffic Control Devices. Impacts would be less than significant with mitigation (Class II).

- Mitigation Measure T-28. Implementation of Improvements at Virginia Elementary School. To mitigate safety impacts to pedestrians, the applicant shall update existing school speed limit and crossing signage per the CAMUTCD and include a yellow beacon that flashes during school hours. The applicant shall install ladder crosswalk striping at uncontrolled crossings and use consistent crosswalk striping at stop-controlled crossings. The applicant shall also install an RRFB at the school crosswalk.
The City finds that Mitigation Measure TR-28 is feasible, is adopted, and will further reduce impacts related to transportation and traffic. Accordingly, the City finds that, pursuant to Public Resources Code section 21081(a)(1) and State CEQA Guidelines section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project that mitigate or avoid the potentially significant impacts of the proposed project related to transportation and traffic, as identified in the EIR. Therefore, impacts are considered less than significant. Mitigation measures will further reduce impacts related to transportation and traffic. (Draft EIR, p. IV.G-80 to IV.G-81.)

9. Impact TR-29: Meadowlark Road is not consistent with the Circulation Element due to lack of Class II bike lanes. There are currently no marked bikeways adjacent to the school. Class II bike lanes are proposed on Meadowlark Road. West of Beechwood Drive, Meadowlark Road is 44-feet in width measured from curb to curb. The project proposes to restripe the roadway with two 10-foot travel lanes, two 5-foot Class 2 bike lanes, and on-street parallel parking 7-feet in width on both sides of the street. This is a significant but mitigable impact (Class II).

− Mitigation Measure T-29. Implementation of Bike Lane Improvements. To mitigate impacts, Class II bike lanes shall be installed on Meadowlark Road from Beechwood Drive to Creston Road.

The City finds that Mitigation Measure TR-29 is feasible, is adopted, and will further reduce impacts related to transportation and traffic. Accordingly, the City finds that, pursuant to Public Resources Code section 21081(a)(1) and State CEQA Guidelines section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project that mitigate or avoid the potentially significant impacts of the proposed project related to transportation and traffic, as identified in the EIR. Therefore, impacts are considered less than significant. Mitigation measures will further reduce impacts related to transportation and traffic. (Draft EIR, p. IV.G-81, Final EIR, p. IV.G-81.)
SECTION 6. SIGNIFICANT UNAVOIDABLE ENVIRONMENTAL EFFECTS OF THE PROJECT FOR WHICH SUFFICIENT MITIGATION IS NOT AVAILABLE

Class I impacts are significant and unavoidable. To approve a project resulting in Class I impacts, the CEQA Guidelines require decision makers to make findings of overriding consideration that "... specific legal, technological, economic, social, or other considerations make infeasible the mitigation measures or alternatives identified in the EIR...".

This section presents the project’s significant environmental impacts and feasible mitigation measures. Section 15091 of the State CEQA Guidelines (14 California Code of Regulations [CCR]) and Section 21081 of the Public Resources Code require a lead agency to make findings for each significant environmental impact disclosed in an EIR. Specifically, for each significant impact, the lead agency must find that:

1. Changes or alterations have been required in, or incorporated into, the project to avoid or substantially lessen the significant environmental effects identified in the Final EIR;
2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by that agency; or
3. Specific economic, social, legal, technological, or other considerations, including provision of employment opportunities for highly trained workers, make the mitigation measures or project alternatives identified in the Final EIR infeasible.

Each of these findings must be supported by substantial evidence in the administrative record. This section identifies impacts that can be reduced, but not to a less-than-significant level, through the incorporation of feasible mitigation measures into the project, and which therefore, remain significant and unavoidable, as identified in the Final EIR. The impacts identified in this section are considered in the same sequence in which they appear in the EIR. Where adoption of feasible mitigation measures is not effective in avoiding an impact or reducing it to a less-than-significant level, the feasibility of adopting alternatives to the project is considered in Section 7 of this document.

A. AIR QUALITY

1. Impact AQ-3: Operation of the project would result in ongoing air pollutant emissions associated with vehicle trips, natural gas use, and area sources, such as landscaping, consumption of consumer products, and off-gassing from architectural coatings. Specifically, operation of the project would generate long-term operational air pollutant emissions that would exceed SLOAPCD daily emissions thresholds for ROG + NOX, DPM, and PM10. Implementation of SLOAPCD’s standard mitigation measures would reduce emissions to the extent feasible. However, impacts would remain significant and unavoidable. In their amicus briefs on the Friant Ranch case, South Coast Air Management District (SCAQMD) and San Joaquin Valley Air Pollution Control District (SJVAPCD) staff state that it is not feasible with existing modeling techniques to precisely correlate a project’s impacts related to ROG, NOX, and particulate matter emissions to quantifiable health impacts, unless the emissions are sufficiently high to use a regional modeling program, which is not the case for the proposed project (Brief for SCAQMD 2018; Brief for SJVAPCD 2018). Further, the SCAQMD and SJVAPCD amicus briefs note that ozone formation is not linearly related to emissions. Therefore, ozone impacts vary depending on the location of the emissions, the location of other precursor emissions, meteorology, and seasonal impacts, and because ozone is formed later and downwind from the actual emission. In addition, the SJVAPCD amicus brief states that although emissions of particulate matter can have a localized impact, the tonnage emitted does not always equate to the local...
particulate matter concentration because local particulate matter concentrations are affected by several factors, including wind transport, meteorology, and complex chemical factors. In addition, secondary particulate matter is formed via a complex process such that the tonnage of PM-forming precursor emissions in a given area does not necessarily result in an equivalent concentration of secondary particulate matter in that same area. Therefore, a general description of the adverse health impacts resulting from the pollutants at issue is the full extent of information that can be provided at this time. The increase in ozone and PM10 concentrations in San Luis Obispo County as a result of project operation would contribute to adverse health impacts that are already occurring due to the region’s nonattainment status for these pollutants. As discussed in the section Air Pollutants of Primary Concern, the health impacts of ozone include respiratory and eye irritation and possible changes in lung functions, and the health impacts of PM10 include increased respiratory symptoms, aggravated asthma, development of chronic bronchitis, nonfatal heart attacks, and premature death in people with heart or lung disease.

Mitigation: Implementation of Mitigation Measure AQ-1 would require incorporation of VMT reduction measures into the proposed Specific Plan, which would reduce mobile source emissions. In addition, implementation of Mitigation Measure AQ-3 would be required.

— Mitigation Measure AQ-3. Land Use Emission Reduction Measures. Prior to issuance of grading permits, the applicants for development projects in the Specific Plan area shall define and incorporate into the Olsen/South Chandler Ranch Specific Plan standard emission reduction measures from the SLOAPCD CEQA Air Quality Handbook to reduce ROG, NOX, DPM, and PM10 emissions below SLOAPCD threshold levels. Consistent with SLOAPCD guidance, land use emission reduction measures shall include, but would not be limited to:


b. Provide shade over 50 percent of parking spaces in parking areas for multi-family land uses and within Planning Area 16 (see Figure 2-5 in Section 2, Project Description) to reduce evaporative emissions from parked vehicles. Shade may be provided by trees, overhangs, shading structures, or other means, as appropriate.

c. Reduce fugitive dust from roads and parking areas with the use of paving or other materials.

d. Implement driveway design standards (e.g., speed bumps, curved driveway) for self-enforcement of reduced speed limits on unpaved driveways.

e. Use a SLOAPCD-approved suppressant on private unpaved roads leading to the site, unpaved driveways and parking areas applied at a rate and frequency that ensures compliance with SLOAPCD Rule 401 (Visible Emissions) and ensures off-site nuisance impacts do not occur.

f. Encourage non-residential land uses to provide a childcare facility on-site.

g. Meet or exceed applicable building standards at the time of development for building energy efficiency with a goal of achieving zero net energy (ZNE) buildings.

h. Meet or exceed applicable building standards at the time of development for utilizing recycled content materials.

i. Meet or exceed applicable building standards at the time of development for reducing cement use in the concrete mix as allowed by local ordinance and conditions.

j. Meet or exceed applicable building at the time of development standards for the use of greywater, rainwater or recycled water.
k. Meet or exceed applicable building standards at the time of development for using shading, trees, plants, cool roofs, etc. to reduce the "heat island" effect.

l. All built-in appliances shall comply with California Title 20, Appliance Efficiency Regulation.

m. Utilize on-site renewable energy systems (e.g., solar, wind, geothermal, biomass, and/or biogas) sufficient to meet or exceed applicable building standards at the time of development with a goal of achieving ZNE buildings.

n. Design roof trusses to handle dead weight loads of standard solar-heated water and photovoltaic panels.

**Finding:** The City finds that specific economic, social, legal, technological, or other considerations make the mitigation measures or project alternatives identified in the Final EIR infeasible. Mitigation Measure AQ-1 and AQ-3 would reduce operational impacts to regional air quality for DPM. However, the project would still exceed SLOAPCD’s daily significance thresholds for ROG + NOX and PM10. No further feasible mitigation measures are available. Therefore, the proposed Specific Plan would result in a long-term increase in criteria pollutants for which the SCCAB is in nonattainment, and long-term operational impacts would be significant and unavoidable. (Draft EIR, p. IV.I-38 to IV.I-42.) A statement of overriding considerations for this impact is made in Section 10.

2. **Cumulative Air Quality Impacts:** A project that exceeds applicable SLOAPCD significance thresholds or is found to be inconsistent with the 2001 CAP would result in a cumulatively considerable contribution a cumulative air quality impact. The project would exceed SLOAPCD daily operational thresholds even with the incorporation of mitigation. Therefore, cumulative impacts on air quality would be significant and unavoidable.

Mitigation: Mitigation Measure AQ-1, AQ-2(a)-AQ-2(g), and AQ-3 would reduce this cumulative impact to the maximum extent feasible. No other feasible mitigation is available that would reduce operational emissions to less than significant.

**Finding:** The City finds that specific economic, social, legal, technological, or other considerations make the mitigation measures or project alternatives identified in the Final EIR infeasible. Mitigation Measures AQ-1, AQ-2(a) through AQ-2(g), and AQ-3 are feasible and have been adopted. However, no additional feasible mitigation is available for cumulative air quality impacts, which would remain significant and unavoidable. (Draft EIR, p. IV.I-54.) A statement of overriding considerations for this impact is made in Section 10.

**B. TRANSPORTATION**

1. **Impact TR-2:** Under Existing Plus Project conditions, the project would result in an unacceptable LOS at one Caltrans-controlled intersection. Caltrans coordination would be required for improvements to SR 46 intersection at Union Road. Therefore, the project’s impacts on the circulation system would be significant and unavoidable (Class I).

   - **Mitigation Measure T-2. Fair Share Funding for Caltrans Intersection (#3) Improvements.** Prior to building permit final for each unit, the applicant shall contribute their fair-share amount through the City’s Transportation Impact Fee (TIF) program, for the ultimate improvements on SR 46E, consistent with the RTP, which consist of restricting left turns on SR 46E at Union Road.

   **Finding:** The City finds that specific economic, social, legal, technological, or other considerations make the mitigation measures or project alternatives identified in the Final EIR infeasible. Development of mitigation measures and improvements for SR 46E/Union...
Road (#3) would require Caltrans coordination and approval. Thus, such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by that agency. Because of the uncertainty of timing and implementation of mitigation measures at this intersection, impacts to SR 46E/Union Road (#3) would remain significant and unavoidable (Class I). (Draft EIR, p. IV.G-31 to IV.G-38.) A statement of overriding considerations for this impact is made in Section 10.

2. **Impact TR-6:** Under Existing Plus Project conditions, the project would result in queueing deficiencies at One City-controlled intersection. Implementation of mitigation measures that require off-site improvements would generally not result in significant residual impacts, as off-site improvements would occur within existing roadway rights-of-way or within urbanized paved/landscaped areas immediately adjacent to existing roadway rights-of-way. Off-site transportation system improvements would not involve construction of any new residential units or commercial structures. During construction of transportation system improvements, potential issue areas that may be temporarily affected would include air quality, cultural resources, hazards and hazardous materials, water quality, noise, and transportation. Construction-related environmental impacts would be mitigated through compliance with City and Caltrans permitting and construction monitoring requirements and standard SLOAPCD dust and diesel emission control measures. Potential long-term impacts of transportation system improvements would include potential land use impacts associated with acquisition of additional right-of-way, demolition of existing structures, or displacement of residences. Feasible mitigation is not available for the intersection to reduce queues to acceptable levels. Therefore, the project’s impact on vehicular queues would be significant and unavoidable (Class I).

   - *Mitigation Measure T-6. Implementation of Improvements at Niblick Road/South River Road (#17).* The applicant shall implement signal timing optimization (e.g., adaptive signal timing improving the efficiency of the corridor operations) at Niblick Road/South River Road. The applicant shall install a dedicated southbound right-turn lane and signal overlap phase. If not installed by others, the applicant shall implement right-turn overlap phases to improve intersection operations. The improvements shall be constructed prior to the final of the building permit for the first unit.

Finding: The City finds that specific economic, social, legal, technological, or other considerations make the mitigation measures or project alternatives identified in the Final EIR infeasible. The required corridor improvements at Niblick Road/South River Road (#17) would not return queues at these facilities to pre-project levels. The Niblick Corridor Study is currently being completed by the City and identifies infrastructural constraints at 1st Street-Niblick Road/Spring Street (#16) and Niblick Road/South River Road (#17), including the lack of availability of width to accommodate additional lanes on the Niblick Road bridge and right-of-way constraints at Niblick Road/South River Road (#17). As a result, queuing impacts at Niblick Road/South River Road (#17) would be significant and unavoidable. (Draft EIR, p. IV.G-43 to IV.G-46.) A statement of overriding considerations for this impact is made in Section 10.

3. **Impact TR-7:** Under Existing Plus Project conditions, the project would increase density at five Caltrans freeway segments operating at unacceptable LOS. Caltrans coordination would be required for improvements to these freeway segments. Therefore, the project’s impacts on the circulation system would be significant and unavoidable (Class I).

   **Mitigation:** No mitigation has been identified that would reduce the capacity impact on US 101.
Finding: The City finds that specific economic, social, legal, technological, or other considerations make the mitigation measures or project alternatives identified in the Final EIR infeasible. Development of mitigation measures and improvements to freeway facilities would require Caltrans coordination and approval. Thus, such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by that agency. Because of the uncertainty of timing and implementation of mitigation measures at these intersections, impacts to US 101 would be remain significant and unavoidable. (Draft EIR, p. IV.G-47 to IV.G-48.) A statement of overriding considerations for this impact is made in Section 10.

4. Impact TR-8: Under Near Term Plus Project conditions, the project would result in an unacceptable LOS at two Caltrans-controlled intersections. Caltrans coordination would be required for improvements to SR 46 intersections at Union Road and Airport Road. Since the City cannot ensure Caltrans cooperation, the project’s impacts on the circulation system would be significant and unavoidable (Class I).

   Mitigation: Implement Mitigation Measure TR-2 Fair Share Funding for Caltrans Intersection (#3) Improvements.

   **TR-8 Fair Share Funding for Intersection (#4) Improvements.** The applicant shall make a fair-share contribution through the City’s TIF program for ultimate improvements on SR 46E, consistent with the RTP, which consists of restricting left turns on SR 46E at Union Road and Airport Road.

Finding: The City finds that specific economic, social, legal, technological, or other considerations make the mitigation measures or project alternatives identified in the Final EIR infeasible. Development of mitigation measures and improvements for SR 46E/Union Road (#3) and SR 46E/Airport Road (#4) would require Caltrans coordination and approval. Thus, such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by that agency. Because of the uncertainty of timing and implementation of mitigation measures at these intersections, impacts to SR 46E/Union Road (#3) and SR 46E/Airport Road (#4) would remain significant and unavoidable. (Draft EIR, p. IV.G-49 to IV.G-52.) A statement of overriding considerations for this impact is made in Section 10.

5. Impact TR-13: Under Near Term Plus Project conditions, the project would result in queueing deficiencies at two City-controlled intersections. Feasible mitigation is not available at these intersections to reduce queues to acceptable levels. Therefore, the project’s impact on vehicular queues would be significant and unavoidable (Class I).

   Mitigation: Implement Mitigation Measure TR-6 Implementation of Improvements at Niblick Road/South River Road (#17) and TR-11 Fair Share Funding for Intersection Improvements. Implementation of mitigation measures that require off-site improvements would generally not result in significant residual impacts, as off-site improvements would occur within existing roadway rights-of-way, or within urbanized paved/landscaped areas immediately adjacent to existing roadway rights-of-way. Off-site transportation system improvements would not involve construction of any new residential units or commercial structures. During construction of transportation system improvements, potential issue areas that may be temporarily affected would include air quality, cultural resources, hazards and hazardous materials, water quality, noise, and transportation. Construction-related environmental impacts would be mitigated through compliance with City and Caltrans permitting and construction monitoring requirements and standard SLOAPCD dust and diesel emission...
control measures. Potential long-term impacts of transportation system improvements would include potential land use impacts associated with acquisition of additional right-of-way, demolition of existing structures, or displacement of residences.

- **TR-13 Fair Share Funding for Intersection (#16) Improvements.** The project shall contribute its equitable share to fund the following transportation improvements. Costs above and beyond the project’s equitable share shall be addressed through such options as fee credits, reimbursement agreements, or development agreements, based on city requirements.

  a. Creston Road/Niblick Road (#11): Prior to building permit final for each unit, the applicant shall contribute their fair-share amount through the City’s TIF program for the installation of a second southbound left-turn, southbound right-turn, and eastbound right-turn lanes. If the Olsen-South Chandler Ranch Specific Plan has not started construction of the improvements prior to the building permit final of the 500th Beechwood unit, the applicant shall construct these improvements. Should the applicant be required to construct the improvements, the project will be eligible to receive TIF credits for the improvements in accordance with City policy.

  b. 1st Street-Niblick Road/Spring Street (#16): Prior to building permit final for each unit, the applicant shall contribute their fair-share amount through the City’s TIF program for the installation of an eastbound right turn lane at this intersection.

**Finding:** The City finds that specific economic, social, legal, technological, or other considerations make the mitigation measures or project alternatives identified in the Final EIR infeasible. The required corridor improvements at 1st Street-Niblick Road/Spring Street (#16) and Niblick Road/South River Road (#17) would not return queues at these facilities to pre-project levels. The Niblick Corridor Study is currently being completed by the City and identifies infrastructural constraints at 1st Street-Niblick Road/Spring Street (#16) and Niblick Road/South River Road (#17), including the lack of availability of width to accommodate additional lanes on the Niblick Road bridge and right-of-way constraints at Niblick Road/South River Road (#17). As a result, queuing impacts at 1st Street-Niblick Road/Spring Street (#16) and Niblick Road/South River Road (#17) would be significant and unavoidable. (Draft EIR, p. IV.G-56 to IV.G-59, Final EIR, p. IV.G-60.) A statement of overriding considerations for this impact is made in Section 10.

6. **Impact TR-14:** Under Near Term Plus Project conditions, Niblick Road east of Spring Street would operate at 99% capacity. Project impacts to this roadway segment would be significant and unavoidable (Class I).

  **Mitigation:** No mitigation has been identified that would reduce the capacity impact on the segment of Niblick Road east of Spring Street.

**Finding:** The City finds that specific economic, social, legal, technological, or other considerations make the mitigation measures or project alternatives identified in the Final EIR infeasible. Niblick Road east of Spring Street operates at 92% capacity under Near Term conditions. With the addition of traffic from the project, the capacity utilization would increase but remain below 100%. The projected capacity utilization of 99% on Niblick Road does not justify the widening of this roadway. Widening the bridge to a six-lane arterial would result in a capacity utilization below 70%, which would reduce vehicle delays, but would also support higher vehicle speeds and would conflict with the City’s multimodal goals and desire to maintain its small-town character. Because no mitigation has been identified, this impact would be significant and unavoidable. (Draft EIR, p. IV.G-60.) A statement of overriding considerations for this impact is made in Section 10.
7. **Impact TR-15:** Under Near Term Plus Project conditions, the project would increase density at seven Caltrans freeway segments operating at unacceptable LOS. Caltrans coordination would be required for improvements to these freeway segments. Therefore, the project’s impacts on the circulation system would be significant and unavoidable (Class I).

**Mitigation:** No mitigation has been identified that would reduce the capacity impact on the US 101 freeway segments. Widening US 101 to a six-lane facility between Spring Street in Paso Robles and Main Street in Templeton would improve mainline and ramp operations to LOS C or better for all segments except the US 101 northbound Spring Street off-ramp with or without the proposed project under Near Term conditions. An additional lane at the US 101 northbound Spring Street off-ramp is needed under Near Term conditions for acceptable operations. However, widening to a six-lane facility has not been identified in SLOCOG or Caltrans studies. The US 101 Corridor Mobility Study identified LOS D-E for the northbound segments and LOS D for the southbound off-ramp diverge under 2035 conditions; however, no improvements were identified.

**Finding:** The City finds that specific economic, social, legal, technological, or other considerations make the mitigation measures or project alternatives identified in the Final EIR infeasible. Development of mitigation measures and improvements to freeway facilities would require Caltrans coordination and approval. Thus, such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by that agency. Because of the uncertainty of timing and implementation of mitigation measures at these intersections, impacts to US 101 would remain significant and unavoidable. (Draft EIR, p. IV.G-60 to IV.G-63.) A statement of overriding considerations for this impact is made in Section 10.

8. **Impact TR-16:** Under Cumulative Plus Project Conditions, the project would result in an unacceptable LOS at two Caltrans-controlled intersections. Caltrans coordination would be required for improvements to SR 46E/Golden Hill Road intersection. Therefore, the project’s impacts on the circulation system would be significant and unavoidable (Class I).

   **TR-16(a) Fair Share Funding for Caltrans Intersection (#2) Improvements**
   The applicant shall make a fair-share contribution through the City’s TIF program for ultimate improvements on SR 46E, consistent with the RTP, which consists of restricting access at the intersection to right-in, right-out.

   **Plan Requirements and Timing.** The fair-share contribution for required improvements shall be submitted on a per-unit basis prior to building permit final for each unit.

   **Monitoring.** The City shall ensure compliance with TIF payment prior to final of each building permit.

   **TR-16(b) Fair Share Funding for Riverside Avenue/Pine Street/US 101 Southbound Ramps (#15) Improvements**
   The applicant shall make a fair-share contribution through the City’s TIF program for installation of an all-way stop control at Riverside Avenue/Pine Street at the US 101 southbound ramps.

   **Finding:** The City finds that specific economic, social, legal, technological, or other considerations make the mitigation measures or project alternatives identified in the Final EIR infeasible. Installation of an all-way stop control at Riverside Avenue/Pine Street at the US 101 southbound ramps would allow the intersection to operate at LOS C or better. Development of mitigation measures and improvements for SR 46E/Union Road (#3) would require Caltrans coordination and
approval. Thus, such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by that agency. Because of the uncertainty of timing and implementation of mitigation measures at these intersections, impacts to SR 46E/Union Road (#3) would remain significant and unavoidable. (Draft EIR, p. IV.G-64 to IV.G-68.) A statement of overriding considerations for this impact is made in Section 10.

9. Impact TR-21: Under Cumulative Plus Project Conditions, the project would result in Queueing Deficiencies at Two City-Controlled intersections. Feasible mitigation is not available at these intersections to reduce queues to acceptable levels. Therefore, the project’s impact on vehicular queues would be significant and unavoidable (Class I).

Mitigation: Implement Mitigation Measure TR-6 and TR-13.

Finding: The City finds that specific economic, social, legal, technological, or other considerations make the mitigation measures or project alternatives identified in the Final EIR infeasible. The required corridor improvements at 1st Street-Niblick Road/Spring Street (#16) and Niblick Road/South River Road (#17) would not return queues at these facilities to pre-project levels. The Niblick Corridor Study is currently being completed by the City and identifies infrastructural constraints at 1st Street-Niblick Road/Spring Street (#16) and Niblick Road/South River Road (#17), including the lack of availability of width to accommodate additional lanes on the Niblick Road bridge and right-of-way constraints at Niblick Road/South River Road (#17). As a result, queuing impacts at 1st Street-Niblick Road/Spring Street (#16) and Niblick Road/South River Road (#17) would be significant and unavoidable. (Draft EIR, p. IV.G-71 to IV.G-73.) A statement of overriding considerations for this impact is made in Section 10.

10. Impact TR-24: Under Cumulative Plus Project Conditions, two City-controlled roadway segments would operate above 90% capacity, but less than 100%. Niblick Road east of Spring Street: operates at 93% capacity under Cumulative conditions. With the addition of traffic from the project, the capacity utilization would increase but remain below 100%. The projected capacity utilization of 99% on Niblick Road does not justify the widening of this roadway. Widening the bridge to a six-lane arterial would result in a capacity utilization below 70%, which would reduce vehicle delays, but would also support higher vehicle speeds and would conflict with the City’s multimodal goals and desire to maintain its small-town character. Creston Road (east of Ferro Lane): would operate at 89% capacity under Cumulative conditions. With the addition of traffic from either project, the capacity utilization would increase above 90% but remain below 100%. The project capacity utilization of 92% does not justify widening per the City’s multimodal goals. Corridor improvements including a center left-turn lane and bike lanes have been adopted by the City. Project impacts to this road segment would be significant and unavoidable (Class I).

Mitigation: No mitigation has been identified that would reduce the capacity impact on these two roadway segments.

Finding: The City finds that specific economic, social, legal, technological, or other considerations make the mitigation measures or project alternatives identified in the Final EIR infeasible. Because no mitigation has been identified this impact would be significant and unavoidable. (Draft EIR, p. IV.G-74.) A statement of overriding considerations for this impact is made in Section 10.

11. Impact TR-25: Under Cumulative Plus Project Conditions, the project would increase density at eight Caltrans freeway segments operating at unacceptable LOS. Widening US 101 to a six-lane facility between Spring Street in Paso Robles and Main Street in Templeton would improve mainline and ramp operations to LOS C or better for all segments except the US 101 northbound Spring Street off-ramp with or without the proposed project under Cumulative conditions. An additional lane at the US 101 northbound Spring
Street off-ramp is needed under Near Term and Cumulative conditions for acceptable operations. However, widening to a six-lane facility has not been identified in SLOCOG or Caltrans studies. The US 101 Corridor Mobility Study identified LOS D-E for the northbound segments and LOS D for the southbound off-ramp diverge under 2035 conditions; however, no improvements were identified. The US 101 Transportation Concept Report for this segment found that in the year 2035 demand is projected to exceed capacity in both the northbound and southbound directions between the urbanized area of Atascadero and south of the Paso Robles urban boundary. The report identifies the following improvement options:

- Interchange improvements
- Parallel route development
- Ramp and auxiliary lane improvements
- Enhanced transit and rail service
- Transportation Demand Management (TDM)
- Transportation System Management (TSM)

The SLOCOG RTP identifies a future SR 46 Urban Multi-Modal Corridor Study for this area. Caltrans coordination would be required for improvements to these freeway segments. Therefore, the project’s impacts on the circulation system would be significant and unavoidable (Class I).

Mitigation: No mitigation has been identified that would reduce the capacity impact on the US 101 freeway segments.

Finding: The City finds that specific economic, social, legal, technological, or other considerations make the mitigation measures or project alternatives identified in the Final EIR infeasible. Development of mitigation measures and improvements to freeway facilities would require Caltrans coordination and approval. Thus, such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by that agency. Because of the uncertainty of timing and implementation of mitigation measures at these intersections, impacts to US 101 would be remain significant and unavoidable. (Draft EIR, p. IV.G-74 to IV.G-75.) A statement of overriding considerations for this impact is made in Section 10.
SECTION 7. FINDINGS REGARDING SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

State CEQA Guidelines §15126.2(d) requires a discussion of any significant irreversible environmental changes that would be caused by the proposed project should it be implemented. Such significant irreversible environmental changes may include the following:

- Use of non-renewable resources during the initial and continued phases of the project that would be irreversible because a large commitment of such resources makes removal or non-use unlikely;
- Primary impacts and, particularly secondary impacts (such as highway improvement that provides access to a previously inaccessible area) that generally commit future generations to similar uses; or
- Irreversible damage which may result from environmental accidents associated with the project.

Urban development in the Specific Plan area would result in the permanent conversion of open, agricultural lands to residential and non-residential uses. Development facilitated by the project would also require building materials and energy, some of which are non-renewable resources. Consumption of these resources would occur with any development in the region and are not unique to the project. The addition of new residential units or commercial use would irreversibly increase local demand for non-renewable energy resources such as petroleum and natural gas. Increasingly efficient building fixtures and automobile engines, as well as implementation of policies included in the Beechwood Specific Plan are expected to offset the demand to some degree. It is not anticipated that growth facilitated by the project would significantly affect local or regional energy supplies. Section IV.O Energy, includes a full analysis of potential impacts related to energy resources by construction and operation of the proposed project.

Growth accommodated under the project would require an irreversible commitment of law enforcement, fire protection, water supply, wastewater treatment, and solid waste disposal services. These topics are discussed in Section IV.M, Public Services, and Section IV.K, Water Supply and Wastewater Capacity of the Draft EIR. Vehicle trips associated with the proposed project would incrementally contribute local traffic and noise levels and regional air pollutant emissions. These topics are discussed in Section IV.I, Air Quality and Greenhouse Gas Emissions, Section IV.H, Noise, and Section IV.G, Transportation/Traffic of the Draft EIR. Impacts related to air quality and transportation/traffic were determined to be significant and unavoidable.
SECTION 8. FINDINGS REGARDING GROWTH-INDUCING IMPACTS

Section 15126.2(e) of the State CEQA Guidelines requires that EIRs discuss the potential for projects to induce population or economic growth, either directly or indirectly. CEQA also requires a discussion of ways in which a project may remove obstacles to growth. Generally speaking, a project may be considered growth inducing if it results in one or more of the five conditions identified below:

1. *Induces population growth;*
2. *Induces economic expansion;*
3. *Establishes a precedent setting action (e.g., an innovation, a radical change in zoning or general plan designation);*
4. *Results in development or encroachment in an isolated or adjacent area of open space (i.e., being distinct from “infill” development); or*
5. *Removes an impediment to growth (e.g., the establishment of an essential public service or the provision of new access to an area).*

The evaluation below is based on buildout of the project which includes: a proposed Specific Plan; General Plan amendment; Rezone; oak tree removal permit; Development Agreement; and formation of a Community Facilities District for the 234.83-acre project site.

The project has been designed with a mixture of residential, open space/recreational uses, and mixed-use commercial, consistent with the development parameters for the Plan area described in the city’s General Plan Land Use Element. Amendments to the Land Use Element are described in Section IV.L.

The proposed project would result in up to 911 residential units ranging from single-family to multi-family and a Neighborhood Commercial Overlay District that would support up to 47,000 square feet of non-residential use. Development of the project would add an estimated 2,467 residents to the city (911 new single family and multi-family dwelling units x 2.72 people/unit - 4 existing units x 2.72 people/unit). When added to the city’s existing population of 31,559, the city’s total population with the project would be 34,026 persons. Table IV.N.5 of the Draft EIR includes the Paso Robles Population and Housing Projections through 2050. The Specific Plan is subject to the requirements of Policy LU-G of the city’s Land Use Element, which describes the development potential of the General Plan, and is intended to provide an appropriate mix and diversity of land uses in Paso Robles. The General Plan development potential described in Policy LU-1A describes a maximum development potential of 16,818 residential dwelling units in the city. The maximum buildout of the Beechwood Specific Plan area under the current General Plan land use designations is 674 as prescribed by Policy LU-1A of the city’s General Plan. As described in Section I, Project Description and Impact PH-1 of the Draft EIR, the project includes a General Plan Amendment and Specific Plan Overlay that would allocate an additional 237 residential units to the Beechwood Specific Plan Area. (911 proposed – 674 prescribed per LU-G). When added to the existing population within the city the proposed project would result in population growth that is consistent with the city’s General Plan.

SLOCOG projects that the city will grow by approximately 6,299 new residents and 2,916 housing units by the year 2050. Therefore, population growth that may result from the project would not conflict with local growth management policy or result in exceedance of local and regional growth projections. Potential environmental impacts specific to increasing population are discussed in Section IV.N Population/Housing. Potential secondary environmental impacts associated with this population growth are analyzed throughout Section IV.N of this EIR.

The proposed project includes residential development and non-residential development. Allowable non-residential uses in the Commercial-Mixed Use designation may include neighborhood retail, food and beverage sales, and other allowable uses described in Table 21.16.200 of the city’s Zoning Code for the Commercial-Mixed Use zone. As such, the proposed project would contribute to economic growth by
providing additional space for business within the city. Additionally, residential development may indirectly contribute to local economic growth as a result of the additional population increasing demand on the local economy for general goods. Increased demand for economic services would be accommodated by existing businesses in the Paso Robles area and could result in growth for certain types of economic activity related to residential development (such as food service and other retail uses). The physical effects of any new commercial development that occurs in the region would depend upon the size, type, and location of such development. Any environmental impacts relating to new commercial development that would serve the project would be addressed as part of separate environmental review of specific development projects. Therefore, the project would not result in impacts related to substantial economic growth.

The proposed project would require discretionary approvals from the city including the Specific Plan, General Plan amendment, Re-Zone, oak tree removal permit, Development Agreement, and Community Facilities District. The Specific Plan, as a long-term land use plan, is intended to reduce the potential for uncontrolled growth from specific development proposals and associated environmental impacts of such growth. Since the project would be required to be consistent with the development parameters and what is envisioned for the Specific Plan area in the city’s General Plan, it would not set a precedent that would have new growth-inducing impacts in the area. Any growth inducement from the proposed actions would occur within what is planned for the site in the city’s General Plan.

Development of open space is considered growth-inducing when it occurs outside urban boundaries or in isolated locations instead of infill areas. Development of the site would occur in an area of the city bordered to the north/west by existing development and would consist primarily of new residential uses. As shown in the Land Use Plan, approximately 7 percent, or about 28.4 acres, of the project area is preserved for recreational and open space uses. The recreational, open space, and trail uses would increase the city’s supply of dedicated parkland, would be dispersed throughout the proposed uses within the Specific Plan area. Therefore, the project would not result in the establishment of open space/vacant land in isolated areas that could induce growth at the city’s periphery.

The project would not result in the removal of an impediment for growth within the City of Paso Robles, as adequate access and services are already available for the adjacent and surrounding areas in the city. The north/western project boundary is contiguous to residential land uses, while the remainder of the site borders agricultural uses with four (4) scattered single-family residences. The project would reduce the potential for uncontrolled piecemeal growth in the region and reduce the pressure for urban sprawl beyond the existing urban limits. In addition, by focusing development within already designated areas, it is anticipated that implementation of the project would reduce growth pressure in undeveloped areas at the periphery of the city and in the adjacent San Luis Obispo County. This would be expected to reduce the potential for impacts relating to such issues as biological resources, regional traffic, and air quality as compared to development on lands beyond urban boundaries.

Wastewater, potable and recycled water, and stormwater collection would be provided to the Specific Plan area through the extension of the existing city infrastructure. Access to the Specific Plan area would be primarily from existing roadways adjacent to the project site. However, the project would also extend Sherwood Road through the Specific Plan area to Airport Road. Including Beechwood Drive in creation of Ridge Road, and creation of Oriole Way to enhance pedestrian connection.

Roadway improvements included in and anticipated by the project, the Meadowlark Drive extension, and the extension of Airport Drive, are anticipated in the 2019 General Plan Circulation Element.

Extending existing city infrastructure to undeveloped areas outside of the Paso Robles city limit would remove a potential obstacle to development in these areas. Lands to the east and south of the Specific Plan area outside of the city limit are currently designated for agricultural use by the County of San Luis Obispo General Plan, and are available for such use, or currently in agricultural use with the support of existing infrastructure, including public and private roadways, and private wells. The city does not
provide water service to properties beyond the city limits. The Paso Robles Purple Belt Action Plan, adopted by the city in September 2009, is intended to create a basis for an eventual physical boundary for urban growth and development outside the current city boundary. The Specific Plan area is bounded by areas identified as a high priority in the Purple Belt Action Plan. These areas limit the potential for urban development that would require extension of city infrastructure. For these reasons the project would not result in the removal of an impediment to growth under the existing land uses anticipated outside of the city limit.

No additional utility infrastructure or facilities beyond those necessary to accommodate anticipated buildout of Paso Robles consistent with the adopted General Plan would be implemented through this proposed project. Therefore, future development outside of the city limit would still be required to construct any infrastructure required to support such development, and the County of San Luis Obispo as the lead agency would be required to review the potential environmental effects of any such development consistent with the requirements of CEQA. Urban development of County of San Luis Obispo land east of the Specific Plan area would result in potential environmental effects similar to the proposed project, depending on the type and level of construction. Residential development would have the potential to result in significant impacts in such areas as traffic, air quality, noise, biological and cultural resources, and land use compatibility relating to the direct interface with agricultural uses.

Overall, the project would not induce new development outside of the Paso Robles city limit, or otherwise remove any existing impediment to growth.
SECTION 9. FINDINGS FOR ALTERNATIVES TO THE PROJECT

A. INTRODUCTION

As identified in Section 6 of this document, the project will result in the following significant and unavoidable environmental impacts:

- **Impact AQ-3**: Operational air pollutant emissions in excess of SLOAPCDs daily emissions thresholds, including cumulative air quality impact
  - A project that exceeds applicable SLOAPCD significance thresholds or is found to be inconsistent with the 2001 CAP would result in a cumulatively considerable contribution to a cumulative air quality impact. The project would exceed SLOAPCD daily operational thresholds even with the incorporation of mitigation. Therefore, cumulative impacts on air quality would be significant and unavoidable.

- **Impact TR-2**: Unacceptable level of service at one Caltrans controlled intersection under Existing conditions

- **Impact TR-6**: Queuing deficiencies at one City-controlled intersection under Existing conditions

- **Impact TR-7**: Unacceptable level of service at five Caltrans freeway segments under Existing conditions

- **Impact TR-8**: Unacceptable level of service at two Caltrans controlled intersection under Near Term conditions

- **Impact TR-13**: Queuing deficiencies at two City-controlled intersection under Near Term conditions

- **Impact TR-14**: Unacceptable capacity at one City roadway segment under Near Term conditions

- **Impact TR-15**: Unacceptable level of service at seven Caltrans freeway segments under Near Term conditions

- **Impact TR-16**: Unacceptable level of service at two Caltrans controlled intersection under Cumulative conditions

- **Impact TR-21**: Queuing deficiencies at two City-controlled intersection under Cumulative conditions

- **Impact TR-24**: Unacceptable capacity at two City roadway segments under Cumulative conditions

- **Impact TR-25**: Unacceptable level of service at eight Caltrans freeway segments under Cumulative conditions

Because the project will result in significant and unavoidable environmental impacts as identified above, the City must consider the feasibility of any environmentally superior alternatives to the project, as proposed. The City must evaluate whether one or more of these alternatives could substantially lessen or avoid the unavoidable significant environmental effects.

Specifically, where significant impacts are identified, section 15126.6 of the State CEQA Guidelines requires EIRs to consider and discuss alternatives to the proposed actions. Subsection (a) states:

(a) An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those
alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.

Subsection 15126.6(b) states the purpose of the alternatives analysis:

(b) Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.

In subsection 15126.6(c), the State CEQA Guidelines describe the selection process for a range of reasonable alternatives:

(c) The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the Project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency’s determination. Additional information explaining the choice of alternatives may be included in the administrative record. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.

The range of alternatives required is governed by a “rule of reason” that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed Project. Alternatives are limited to ones that would avoid or substantially lessen any of the significant effects of the Project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the Project.

As such, the environmental superiority and feasibility of each alternative to the project is considered in this section. The project objectives are set forth in Section 2.A above. Specifically, this Section 9 evaluates the effectiveness of these alternatives in reducing the significant and unavoidable impacts of the project.

B. ALTERNATIVES CONSIDERED BUT REJECTED FROM DETAILED ANALYSIS

As required by section 15126.6(c) of the CEQA guidelines, the selection of alternatives for this EIR included a screening process to determine a reasonable range of alternatives, which could reduce significant effects but also feasibly meet project objectives. Alternatives that do not clearly provide any environmental advantages compared to the project, do not meet basic project objectives, or do not achieve overall lead agency policy goals, have been eliminated from further consideration. The factors that may be considered when addressing the feasibility of alternatives include site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site.

The following alternatives were considered but eliminated from further analysis by the City of Paso Robles due to one or more of these factors:

- Alternative Sites
THE PROCESS OF IDENTIFYING LAND USES IN EXPANSION AREAS WAS DRIVEN TO A LARGE EXTENT BY THE NEED TO ADEQUATELY PLAN FOR ENOUGH HOUSING FOR THE FUTURE AND TO MEET STATE MANDATED HOUSING REQUIREMENTS. THEREFORE, ALL POTENTIAL ALTERNATIVE SITES FOR THIS GROWTH WERE CONSIDERED AT THAT TIME, INCLUDING THE BEECHWOOD SITE AS AN EXPANSION AREA TO BE ANNEXED INTO THE CITY. FOR THESE REASONS, THERE ARE NO OTHER FEASIBLE ALTERNATIVE SITES AVAILABLE FOR CONSIDERATION TO ACCOMPLISH THE GENERAL PLAN OBJECTIVES FOR HOUSING AND LAND USE. AS A RESULT OF THESE CONSIDERATIONS, THIS ALTERNATIVE WAS CONSIDERED AND REJECTED, CONSISTENT WITH CEQA GUIDELINES SECTION 15126.6(C). C. DESCRIPTION OF THE ALTERNATIVES

The Final EIR for the project evaluates the following three alternatives to the project: (1) a no project alternative; (2) an Existing Zoning and General Plan density alternative; and (3) a reduced density and vehicle trip reducing alternative.

**Alternative 1: No Project.** Consistent with the CEQA Guidelines (§15126.6(e)), the “no project” alternative reflects the existing conditions. The project site would not change and there would be no site grading. For purposes of the FEIR the “No Project” assumed the existing conditions on the project site would not change, however, it is worth making note that the development of Beechwood site under the existing zoning and land use density in the General Plan will likely occur under the existing land use regulation, as described in Alternative 2.

**Alternative 2: Existing Zoning and General Plan Density.** This alternative assumes that the Specific Plan area is developed consistent with the existing General Plan Land Use Element density allocations. Therefore, this alternative would result in a maximum of 674 residential units in the Specific Plan area alongside approximately 10 acres (47,000 sf) of neighborhood commercial uses, and about 40 acres of open space. Similar to the proposed project, the existing Beechwood Specific Plan overlay would remain under this alternative and includes development of a proposed Specific Plan to determine the actual distribution of land uses and parcel sizes. However, under Alternative 2, no General Plan or Zoning Code and Map Amendments would be required.

Similar to the proposed project, the Specific Plan under this Existing Zoning and General Plan Density Alternative would identify architectural design guidelines so that neighborhoods are designed with differentiated aesthetics, but with theme elements in common throughout the various neighborhoods. Alternative 2 would include a slightly modified circulation plan based on distribution of land uses and parcel sizes, with streetscape character requirements, and bicycle and pedestrian pathways. Grading and earthwork necessary for development would be similar to the proposed project, however fewer individual residential building pads would be required as there would be less residential development planned under this alternative. Similar to the proposed project, new public utility infrastructure improvements would be constructed throughout the Specific Plan area; the demand for water, wastewater, recycled water, dry utilities, and stormwater conveyance would be less that the proposed project’s demand.

**Alternative 3: Reduced Density Project, Vehicle Trip Reducing.** This alternative assumes that the number residential units would be decreased to reduce the severity of the project’s potential transportation (and associated air quality) impacts. To evaluate a project that would reduce transportation impacts, 250 new residential units was identified as the appropriate reduced density alternative.
Alternative 3 would result in a maximum of 250 residential units in the Specific Plan Area and about 15-acres of open space. No commercial development would be assumed. Similar to the proposed project, the existing Beechwood Specific Plan overlay would remain under this alternative and includes development of a proposed Specific Plan to determine the actual distribution of land uses and parcel sizes. Under Alternative 3, the Specific Plan Area would need to be down-zoned through a General Plan and Zoning Code amendment to reflect the lower limit of allocated development, but would otherwise be well within anticipated growth projections in the City’s General Plan.

Similar to the proposed project, the Specific Plan under this Reduced Density Alternative would identify architectural design guidelines so that neighborhoods are designed with differentiated aesthetics, but with theme elements in common throughout the various neighborhoods. Alternative 3 would include a slightly modified circulation plan based on distribution of land uses and parcel sizes, with streetscape character requirements, and bicycle and pedestrian pathways. The type of grading and earthwork necessary for development would be similar to the proposed project, however fewer individual residential building pads would be required as there would be substantially less residential development planned under this alternative (approximately 75% less). Similar to the proposed project, new public utility infrastructure improvements would be constructed throughout the Specific Plan area; the demand for water, wastewater, recycled water, dry utilities, and stormwater conveyance would be less that the proposed project’s demand.

D. EFFECTIVENESS OF ALTERNATIVES IN AVOIDING SIGNIFICANT PROJECT IMPACTS

This section evaluates the effectiveness of the alternatives in reducing the significant and unavoidable impacts of the project.

1. Significant and Unavoidable Air Quality Impacts

The project would result in significant and unavoidable project-level and cumulative impacts related to long-term, operational emissions of criteria pollutants.

Under Alternative 1 (No Project), Under the No Project Alternative, the existing conditions at the project site would not change; the existing buildings and uses would be retained in their current condition and the Project would not be approved. None of the significant and unavoidable Air Quality impacts associated with the proposed project would occur.

Under Alternative 2 (General Plan Density) would result in approximately 35 percent fewer residential units than the proposed project. Therefore, operational air pollutant emissions from area, energy, and mobile sources associated with residential land uses would incrementally decrease in comparison to the proposed project.

Alternative 2 differs from the Project primarily by being consistent with the existing Zoning designations and General Plan Land Use Element density allocations resulting in (674 vs. 911 units), and about 15 fewer open space acres (40 acres vs. 54.5 acres). This alternative includes the same amount of neighborhood commercial space (47,000 sf) to be constructed on 10 acres.

Because the land use mix would be similar to that of the proposed project, operational emissions would still likely exceed SLOAPCD thresholds for ROG + NOX and fugitive PM_{10} due to the size and intensity of development under this alternative. The analysis of operational air pollutant emissions qualitatively evaluated the difference in estimated emissions based on the reduction in residential density resulting in proportionately reduced operational air pollutant emissions (approximately 35% less). Mitigation is not available to reduce operational air pollutant emissions to below SLOACPD thresholds. As such, the
Existing Zoning and General Plan Density Alternative would not avoid the significant and unavoidable air quality impact identified in this EIR for the project as proposed.

Alternative 3 (Reduced Density, Vehicle Trip Reducing) would result in a maximum of 250 residential units in the Specific Plan area, alongside similar non-residential amenities and infrastructure to the project. This alternative would result in approximately 75 percent fewer residential units than the proposed project. Therefore, operational air pollutant emissions from area, energy, and mobile sources associated with residential land uses would decrease by approximately 75 percent in comparison to the proposed project while operational emissions from non-residential land uses would remain the same.

This alternative would result in similar but reduced impacts to air quality. Construction emissions under Alternative 3 would not exceed SLOAPCD daily and quarterly thresholds for ROG + NOX, fugitive dust, and DPM and would avoid the need for Mitigation Measures AQ-2(a) through AQ-2(f). Operational emissions would exceed ROG + NOX thresholds and require mitigation, but emissions of fugitive PM10 and DPM would not exceed the daily thresholds.

Mitigation Measures AQ-1 and AQ-3 would reduce ROG + NOX emissions from under Alternative 3 by approximately 9.5 percent to 30.0 pounds per day, which would still exceed the SLOAPCD threshold of 25 pounds per day. Therefore, this alternative would result in reduced impacts to air quality as compared to the project but would not avoid the significant and unavoidable air quality impact.

2. Significant and Unavoidable Transportation Impacts. The project would result in project-level and cumulative transportation impacts associated with impacts to project area intersections, queue lengths, freeway operations, and roadway segments.

Under Alternative 1 (No Project), The intersection and roadway segments currently operating at unacceptable levels under existing conditions would continue under the No Project Alternative. None of the mitigation measures identified for the project for other topics would be required.

Alternative 2: The Specific Plan area would be develop consistent with the existing Zoning and General Plan Land Use Element density allocations resulting in approximately 22 percent fewer net new vehicle trips and LOS when compared to the proposed project. As summarized in this alternative would generate fewer daily, AM peak hour, and PM peak hour net new trips when compared to the proposed project (8,539 vs 10,484 net trips). Vehicle trips generated by this alternative would exceed LOS thresholds and queues at area intersections and freeway segments at most of the intersections identified as impacted under the proposed project. The alternative would lesson impacts at two intersections:

- At Creston Road and Meadowlark significant existing plus project impacts would be avoided
- At Creston Road and Charolais Road significant near term plus project and cumulative LOS impacts at the intersection would be avoided.
Because the number of significant and unavoidable impacts to transportation under this alternative would be similar in comparison to the project, this alternative would result in similar, but slightly less impacts to the transportation network in comparison to the project.

Alternative 3 would result in 661 fewer residential units and includes no neighborhood commercial space development, approximately 75 percent fewer net new vehicle trips and LOS impacts are estimated when compared to the Project. Vehicle trips generated by this alternative would reduce impacts at all City-controlled intersections, and would avoid the following identified significant traffic/transportation impacts of the proposed project:

- Existing Conditions plus project impacts at Creston Road/Stoney Creek Road
- Existing Conditions plus project impacts at Creston Road/Meadowlark Road
- Existing Conditions plus project impacts at South River Road/Charolais Road
- Near Term plus project impacts at Creston Road/Stoney Creek Road
- Near Term plus project impacts at Creston Road/Meadowlark Road
- Near Term plus project impacts at Creston Road/Charolais Road
- Cumulative impacts at Creston Road/Meadowlark Road
- Cumulative impacts at Creston Road/Charolais Road

Despite the avoided/minimized impacts on these intersections, this alternative would not avoid all significant and unavoidable transportation impacts identified for the proposed project. Potential impacts would be reduced, but remain significant and unavoidable.

E. FEASIBILITY OF PROJECT ALTERNATIVES

Alternative 1: No Project

a. Environmental Effects: None of the mitigation measures identified for the project for other topics would be required. Development and growth would continue in the vicinity of the project site as reasonably foreseeable future projects are approved, constructed, and occupied. These projects could contribute to cumulative impacts in the vicinity, but under the No Project Alternative, land use activity on the project site would not contribute to these cumulative impacts beyond existing levels.

b. Ability to Achieve Project Objectives: This Alternative would fail to meet all basic project objectives. Alternative 1 would be inconsistent with the City’s Housing Element and would fail to provide a range of housing types and affordable options, including rental and workforce housing. Therefore, Alternative 1 would fail to meet several of the major project objectives including:

   a. Meet regional and local workforce housing needs by providing a mix of land uses and housing types for a range of income levels;

   b. Create healthy neighborhoods by providing recreational opportunities and safe walking and biking facilities connected with the rest of the City;

   c. Provide a safe and interconnected circulation network for all modes and abilities;

   d. Provide certainty that phasing, financing, and maintenance of Plan Area infrastructure, and services proceed in a manner that serves the interest of the community;
e. Provide for a variety of commercial uses to service the Specific Plan community and adjacent neighborhoods and allow for specialty light commercial uses to support area-wide needs.

c. Feasibility: Development under this Alternative would be located within City limits and would not exceed the existing General Plan land use density. This Alternative would provide a less intense development than the proposed project, would require less infrastructure, and would place less strain on existing services.

d. Finding: This Alternative would avoid the Class I impacts of the project and would not increase environmental impact associated with air quality emissions, odors, and energy consumption. The City rejects Alternative 1 on the following grounds, each of which provides sufficient justification for rejection of this alternative: (1) the alternative fails to meet all basic project objectives.

Alternative 2: Existing Zoning and General Plan Density.

a. Environmental Effects: Alternative 2 would eliminate 237 proposed residential units compared to the project. As a result, traffic and associated impacts to the transportation system, air quality, greenhouse gas emissions, and energy consumption under Alternative 2 would be correspondingly reduced. However, this reduction does not avoid any of the Class I impacts associated with the project and would result in similar environmental impacts and required mitigation in comparison to the project.

b. Ability to Achieve Project Objectives: Alternative 2 would fail to provide certainty that phasing, financing, and maintenance of the Plan Area infrastructure, and services proceed in a manner that serves the interest of the community. The alternative would meet the objectives of regional and local workforce housing needs and creation of healthy neighborhoods.

c. Feasibility: This alternative is legally, technologically, and socially feasible pursuant to CEQA Guidelines section 15126.6(f)(1). This Alternative would be located on the same project site as the Project and would be consistent with the current General Plan land use and density requirements. This Alternative would provide 237 less residential units than the proposed project. This Alternative would provide a less intense development than the proposed project, would require less infrastructure, and would place less strain on existing services. Development under this Alternative would consist of single-family housing, neighborhood commercial, an elementary school, and associated open space and infrastructure, which would be typical of similar developments.

d. Finding: Due to the similar development nature of Alternative 2 in comparison to the project, this Alternative would not avoid any of the Class I impacts of the project and would result in similar environmental impacts and mitigation requirements to the project. While this Alternative would satisfy most of the basic project objectives, it would provide fewer residential units, resulting in a reduced level of benefit towards housing objectives due to the reduction in residential units. Therefore, it would not achieve key project objectives to the extent that the project would. The City rejects Alternative 2 on the following grounds, each of which provides sufficient justification for rejection of this alternative: (1) the alternative fails to fully satisfy project objectives; and (2) the alternative would not eliminate the significant unavoidable impacts of the project.

Alternative 3 (Reduced Density Project, Vehicle Trip Reducing).
a. **Environmental Effects:** Alternative 3 would eliminate 75 percent of the proposed residential units and all neighborhood commercial development. The severity of significant unavoidable operational air quality emissions and transportation impacts resulting from this Alternative would be reduced in comparison to the project. This alternative would require similar mitigation to the Project for Air Quality and Transportation.

b. **Ability to Achieve Project Objectives:** Alternative 3 would be inconsistent with the City’s Housing Element and would fail to provide a range of housing types and affordable options, including rental and workforce housing. Therefore, Alternative 3 would fail to meet several of the major project objectives including:

1. Provide residential units to help meet the needs of the City of Paso Robles and address the current state-wide housing shortage;
2. Provide a wide range of housing opportunities for the city that are anticipated by city planning decisions and guidelines.

c. **Feasibility:** Development under this Alternative would be located within City limits and would not exceed the existing General Plan land use density. This Alternative would provide a less intense development than the proposed project, would require less infrastructure, and would place less strain on existing services. Development under this Alternative would consist of single-family housing, and associated open space and infrastructure. However, Senate Bill 330 would prevent the City from reducing the number of housing units allowed on-site. Therefore, it is infeasible to assume a project would provide less housing than would be allowed under current land use regulations.

d. **Finding:** This Alternative would result in significant and unavoidable impacts to air quality during the operational phase and transportation operations. In addition, Senate Bill 330 would prevent the City from reducing the number of housing units allowed on-site. Therefore, it is infeasible to assume a project would provide less housing than would be allowed under current land use regulations. The City rejects this alternative on the following grounds, each of which provides sufficient justification for rejection of this alternative: (1) the alternative fails to meet several basic project objectives and would be inconsistent with the City’s Housing Element goals and policies; (2) the alternative would not eliminate the significant unavoidable impacts of the project; and (3) the alternative is infeasible.

### F. ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Section 15126.6(e)(2) of the State CEQA Guidelines indicates that an analysis of alternatives to a proposed Project shall identify an environmentally superior alternative among the alternatives evaluated in an EIR. Based on the alternatives analysis contained within the Draft EIR, the Reduced Density Project, Vehicle Trip Reducing Alternative (Alternative 3) is identified as the Environmentally Superior Alternative.

Based on the comparison shown in Table V-3, the No Project Alternative is considered the overall environmentally superior alternative because the impacts associated with implementation of the Proposed Project would not occur under the No Project Alternative. However, the No Project Alternative would not meet any of the project objectives.
Therefore, the Reduced Density Project Alternative (Alternative 3) would result in the next fewest adverse environmental effects in comparison to the proposed project and is the environmentally superior alternative in accordance with the CEQA Guidelines Section 15126.6. Alternative 3 would result in a maximum of 250 residential units in the Specific Plan area, 661 fewer residential units than the proposed project and would contain no commercial development. This substantial reduction in new residential units would result in substantially reduced impacts to air quality and would reduce less than significant impacts to aesthetics, biological resources, hydrology and water quality, noise, population and housing, public services, recreation and utilities and service systems. Alternative 3 would also fail to meet several of the basic project objectives include meeting regional and local workforce housing needs by providing a mix of land uses and housing types for a range of income levels, and providing new variety of commercial uses to service the Specific Plan community and adjacent neighborhoods and allow for specialty light commercial uses to support area-wide needs. The reduction of 661 residential units in comparison to the proposed project would also fail to provide the proposed amount of housing and would not meet the General Plan Land Use Element density allocations in the Specific Plan area. The reduced residential density would likely provide large lot rural estate development which may be unaffordable to local workforce and would eliminate the higher density rental and workforce housing identified as a community need in the Housing Element.

The Reduced Density Alternative (Alternative 3) would meet many of the basic project objectives. However, this alternative would not provide a substantially environmentally superior project. As shown in Alternative 3 would have similar environmental effects in comparison to the proposed project for most of the issues areas evaluated in this EIR, while providing substantially fewer new residential units and similar non-residential amenities and infrastructural improvements to the project.
SECTION 10. STATEMENT OF OVERRIDING CONSIDERATIONS

A. INTRODUCTION

The Final EIR for the project identifies the following significant and unavoidable impacts of the project:

1. The operation of the project would generate long-term operational air pollutant emissions which would exceed SLOAPCD daily emission thresholds of ROG and NOx, DPM, and PM_{10}.
2. The project would exceed applicable SLOAPCD significance thresholds and would result in a cumulatively considerable contribution to a cumulative air quality impact.
3. Under Existing conditions the project would result in an unacceptable level of service at eleven project area intersections. Mitigation would not reduce impacts at six of the intersections; improvements to State Route 46 intersections would require Caltrans coordination and would be significant and unavoidable. The project would result in an unacceptable level of service at fourteen project area intersection under Near-Term Plus Project conditions. Mitigation would not reduce impacts at nine of the intersections; improvements to State Route 46 intersections would require Caltrans coordination and would be significant and unavoidable.
4. Under Near-Term Plus Project conditions Niblick Road (east of Spring Street) would operate at an unacceptable capacity. The project would exceed available storage capacity at eight intersections. Feasible mitigation is not available to reduce the capacity impact of Niblick Road, east of Spring Street.
5. The project would cause one freeway segment to operate at an unacceptable LOS and contribute to existing unacceptable delays at five freeway segments under Existing Plus Project conditions and would cause two freeway segments to operate at an unacceptable LOS and contribute to existing unacceptable delays at seven freeway segments under Near Term Plus Project conditions. Because of the lack of feasible available mitigation to address this impact and because of uncertainty associated with timing and implementation of mitigation, identified impacts to freeway segments would be significant and unavoidable.
6. Under Cumulative Plus Project conditions, the project would cause area intersections to operate at unacceptable LOS, exceed queue length and roadway segment capacities, cause freeways segments to operate at unacceptable LOS. Feasible mitigation is not available to reduce cumulative impacts to the transportation network to less than significant.

For projects which would result in significant environmental impacts that cannot be avoided, CEQA requires that the lead agency balance the benefits of these projects against the unavoidable environmental risks in determining whether to approve the projects. If the benefits of these projects outweigh the unavoidable impacts, those impacts may be considered acceptable (CEQA Guidelines Section 15093[a]). CEQA requires that, before adopting such projects, the public agency adopt a Statement of Overriding Considerations setting forth the reasons why the agency finds that the benefits of the project outweigh the significant environmental effects caused by the project. This statement is provided below.

B. REQUIRED FINDINGS

1. Environmental Determination. The City Council hereby certifies that the Final EIR adequately identifies the project’s potentially significant impacts, alternatives to the project, and recommended mitigation measures.

2. Final EIR Findings. Based upon all the evidence, the City Council makes the following findings in certifying the Final EIR.
a. The Final EIR has been completed in compliance with CEQA and was considered by the City prior to any approvals of the project.

b. The Final EIR reflects the independent judgment of the City.

c. For each significant effect identified in the Final EIR the approved mitigation measures contained in the Final EIR will avoid or substantially lessen the identified adverse environmental impacts of the project to a level where they are not significant and have been incorporated into the project.

d. The significant effects identified in the Air Quality section of the EIR related to long-term operational emissions of ROG and NOX and in the Transportation section of the EIR related to impacts to intersection LOS, storage capacity at intersections, roadway segment capacity, and freeway segments LOS will not be fully mitigated to a degree where they are not significant with the incorporation of all of the identified mitigation measures contained in the Final EIR. However, the City Council finds that the adverse environmental effects are acceptable and makes a statement of overriding considerations for those significant and unavoidable environmental impacts.

3. **Statement of Overriding Considerations.** The City Council has identified the following overriding economic, social, and other public benefits of the project, which are additional reasons that the significant and unavoidable impacts identified in the Final EIR can be found acceptable, and hereby adopts them as a statement of overriding considerations:

a. The Beechwood Specific Plan will develop new residential neighborhoods that fulfill a portion of the City’s housing needs, consistent with Housing Element Policy H-1.1.

b. The Beechwood Specific Plan provides for a variety of housing types and costs to meet the needs of renters and buyers with a variety of income-levels, including single-family, townhomes, and multi-family options, consistent with Housing Element Policy H-1.2.

c. The Beechwood Specific Plan will designate approximately 7 percent, or about 28.4 acres, of the Specific Plan area for recreational and open space uses, including a 8.1-acre community park for residents of the City, semi-public and private recreational amenities, and a network of trails and multi-modal paths, consistent with Parks and Recreation Element Policy PR-1A.

d. The project will include on-site restoration of riparian habitat at two times the habitat impacts and would preserve 100 oak trees and plant a minimum of two 24-inch box, 1.5-inch oaks trees on-site for each oak tree removed, consistent with Land Use Element Policy LU-2K and Conservation Element Policy C-3A.

e. The Beechwood Specific Plan includes pedestrian and bicycle paths and multi-modal boulevards separated by landscaped medians throughout the Specific Plan area, providing pedestrians and bicyclists with off-street circulation options that connect open space and recreational areas with housing and commercial areas, consistent with Conservation Element Policy C-2B, Housing Element Policy H-6.1, and Circulation Element Policies CE-1B and CE-1F.

f. The project would create new construction-related and permanent jobs in the project area. Planned commercial development and upkeep of the Specific Plan area would provide jobs in close proximity to housing.

g. As required by the City General Plan, Beechwood Specific Plan contains policies and standards that will facilitate appropriate development of land, protection of open space, and provision of adequate public facilities consistent with the City’s General Plan.
4. *The Mitigation Monitoring Program, attached as Exhibit A, has been reviewed by the City Council in conjunction with its review of the Final EIR, and shall be carried out by the responsible parties by the identified deadlines.*

Accordingly, the City finds that the project’s adverse, unavoidable environmental impacts are outweighed by these considerable benefits.

Dated: _________________, 2020

Steven W. Martin  
Mayor, City of Paso Robles
Part Three:  
Mitigation Monitoring and Reporting Program

SCH # 2018061064

Beechwood Specific Plan, General Plan Amendment and Rezoning

City of El Paso de Robles
1000 Spring Street
Paso Robles, California 93446

Prepared by:

187 Tank Farm Road Suite 230
San Luis Obispo CA
93401
805.781.9800
Principle: LINDSAY CORICA ASLA
# Mitigation Monitoring and Reporting Plan

State Clearinghouse No. and Name: SCH#2019011065, Beechwood Specific Plan

Applying Resolution No.: _____________ by: □ Planning Commission □ City Council Date: _____________

The following environmental mitigation measures were either incorporated into the approved plans or were incorporated into the conditions of approval. Each and every mitigation measure listed below has been found by the approving body indicated above to lessen the level of environmental impact of the project to a level of non-significance. A completed and signed checklist for each mitigation measure indicates that it has been completed.

<table>
<thead>
<tr>
<th>Mitigation Measure</th>
<th>Type</th>
<th>Monitoring Department or Agency</th>
<th>Shown on Plans</th>
<th>Timing/Remarks</th>
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<tbody>
<tr>
<td>AES-2 Master Landscape Plan Requirements</td>
<td>Project</td>
<td>CDD</td>
<td>These requirements shall be implemented with the approval of landscape and irrigation plans that are submitted in conjunction with improvement plans for each development area, public improvement plans, on-site improvement plans, and plot plans.</td>
<td>City staff shall verify the submittal of landscape plans with any permits listed and review all landscape plans for consistency with Project development plans as applicable. Prior to all building permit finals, City staff shall inspect all landscape installations.</td>
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</table>

1. Retaining/barrier walls and other vertical boundaries shall be in tones compatible with surrounding terrain using textured materials or construction methods, which create a textured effect. Walls shall be landscaped to provide screening from adjacent open space areas, visual corridors, and gateways (Linne Road), using drought-tolerant, low-maintenance, and native species where appropriate. Perimeter landscaping of retention/drainage basins shall consist of low maintenance trees and shrubs.

2. Retaining/barrier walls shall be limited to 5 feet in height, measured from the top of grade in front of the wall to the top of the wall cap. Where retaining conditions require walls to be higher than 5 feet, the wall shall be separated into two or
### Mitigation Measure

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<td>more walls with a minimum of 3 feet between each wall for screen planting.</td>
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<td>3. Landscaping using native oak trees, shrubs, and groundcover shall be preferred to perimeter fencing</td>
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<td>to the maximum extent feasible. Where required, perimeter fencing shall be decorative or designed</td>
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<td>to minimize interference with wildlife movement.</td>
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<td>4. All medians and strips designated for landscaping shall utilize drought-tolerant species to the</td>
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<td>maximum extent feasible, consisting of low maintenance trees, shrubs, and groundcover that do not</td>
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<td>obstruct views for motorists, bicyclists, and pedestrians.</td>
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<td>5. Natural turf shall only be permitted in areas of active use and must comply with the city’s Water</td>
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<td>Efficient Landscape Ordinance standards. Decorative natural turf is prohibited. The extent, height,</td>
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<td>and quantity of cut and fill shall be minimized to the extent feasible to preserve natural components</td>
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<td>of the existing landscape, including existing oak trees.</td>
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#### AES-3 Sports Field Lighting Evaluation

Prior to issuance of building permits for a multi-purpose athletic field, a lighting and glare engineering design evaluation shall be prepared and submitted to the City of Paso Robles Community Development Department for review and approval. The design evaluation shall include, at minimum, an illumination summary based on the grid, spacing, height, and luminaire type of any proposed field lighting, and an evaluation of the extent and location of any offsite light trespass or glare. Field lighting shall be designed such that no light trespass would occur beyond the athletic field boundary and that no point-source light would be visible from beyond the athletic field boundary.

If the lighting and glare engineering design evaluation is prepared by a prospective vendor or manufacturer of the lighting system to be used on the project, an independent evaluation of the manufacturer’s lighting data shall be conducted for the purpose of confirming that no light trespass would occur beyond the athletic field boundary and that no point-source light would be visible from beyond the athletic field boundary.

These requirements shall be implemented with the approval of landscape and irrigation plans that are submitted in conjunction with improvement plans for each development area, public improvement plans, on-site improvement plans, and plot plans.

City staff shall verify the submittal of landscape plans with any permits listed above and review all landscape plans for consistency with Project development plans as applicable. Prior to all building permit finals, City staff shall inspect all landscape installations.
### Beechwood – Specific Plan Mitigation Monitoring and Reporting Program

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<tr>
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<tr>
<td>boundary. The independent evaluation shall be prepared by a qualified engineer who is not a prospective vendor or manufacturer of the lighting system to be used on the Project and findings shall be documented in a Lighting Evaluation Report for review and approval by the City of Paso Robles Community Development Department. The Lighting Evaluation Report shall include the following at a minimum:</td>
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<tr>
<td>a. If offsite light trespass or point-source visibility is identified in the Lighting Evaluation Report, specific recommendations shall be identified to eliminate such trespass and/or visibility. Recommendations may include but not be limited to: repositioning lights, lowering heights, increasing sizes of cut-off shields, altering types of luminaires or wattage, or modifying operational procedures.</td>
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<tr>
<td>b. The City shall include the recommendations made by the Lighting Evaluation Report as conditions of approval for the multi-purpose athletic field. The results of the Lighting Evaluation Report shall be field verified to ensure light trespass has been adequately eliminated at offsite locations and no point-source lighting is visible from beyond the athletic field boundary.</td>
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**AG-1 Conservation of Agricultural Land**

The project applicant shall revise the Specific Plan to change the land use and zoning designations of the PG&E ownership and easement area corridor to Agriculture.

**AG-2(a) Agricultural Conflict Avoidance Measures**

The following language shall be added to the Specific Plan:

AGricultural buffer easements, berms, and/or vegetative screening shall be implemented on newly recorded lots in the Specific Plan area adjacent to active agricultural uses outside of the Specific Plan area. Agricultural buffer easements, berms, and/or

The applicant shall clearly identify language in the Specific Plan.

Prior to development plan approval the City Community Development Department shall verify with General Plan Policy OS-1A and Policy LU-2E.
## Beechwood – Specific Plan Mitigation Monitoring and Reporting Program

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<tr>
<td>Vegetative screening shall provide a minimum of 50 feet between active agricultural land uses outside of the Specific Plan area and new habitable structures in the Specific Plan area. The requirement will be a condition of approval of discretionary development applications, consistent with the requirements of Action Item 10 under Policy OS-1A and Action Item 4 under Policy LU-2E in the City’s General Plan and will include City-approved measures to reduce availability of public access to agricultural cultivation areas adjacent to the project site (e.g., fencing, signs, etc.). Future residents shall be notified of agricultural buffers as part of purchase or lease agreements.</td>
<td>Project</td>
<td>CDD</td>
<td>The applicant shall clearly identify measures such as fencing, signage, etc. within the development plan and tract map.</td>
<td>The City shall review the development plan and VTTM to ensure that design includes installation of fencing and signs as required under Mitigation Measure AG-2(b). During construction the City shall also conduct field inspections at appropriate phases of project construction to confirm installation of appropriate fencing.</td>
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<tr>
<td>AG-2(b) Agricultural Fencing</td>
<td>Project</td>
<td>CDD</td>
<td>The project applicant shall coordinate with the City to fund installation of fencing and signs along the southern and eastern boundaries of the Beechwood property at locations where active agricultural operations are adjacent to the Specific Plan area to minimize potential for increases in trespass and vandalism of adjacent agricultural areas.</td>
<td>The project applicant shall incorporate Alternative Transportation and Transportation Demand Management Measures into the Specific Plan. Developers of projects in the Specific Plan area shall incorporate applicable transportation demand measures into project plans and submit documentation to the city.</td>
</tr>
<tr>
<td>AQ-1 Alternative Transportation and Transportation Demand Management Measures</td>
<td>Project</td>
<td>CDD</td>
<td>Prior to issuance of grading permits, the applicant shall incorporate into the Specific Plan applicable VMT-reducing measures from the SLOAPCD CEQA Air Quality Handbook. Consistent with SLOAPCD guidance, VMT-reducing measures shall include, but would not be limited to:</td>
<td>The project applicant shall incorporate Alternative Transportation and Transportation Demand Management Measures into the Specific Plan. Developers of projects in the Specific Plan area shall incorporate applicable transportation demand measures into project plans and submit documentation to the city.</td>
</tr>
<tr>
<td>Incorporate a goal/policy into the Specific Plan to expand San Luis Obispo County Regional Transit Authority (SLORTA) Paso Express Routes A and B with new stops in the Plan Area to ensure a majority of the Plan Area is within 0.25 mile of a transit stop.</td>
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### Beechwood –Specific Plan Mitigation Monitoring and Reporting Program

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<tr>
<td>b. Provide public transit amenities (e.g., covered transit turnouts, direct pedestrian access, bicycle racks, covered bench, smart signage, route information displays, lighting, etc.) in the Plan Area to facilitate expansion of Paso Express Routes A and B prior to building permit issuance.</td>
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<td>that employers in non-residential components of the project have either implemented trip reduction measures or provided proof that applicable measures are infeasible.</td>
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<td>c. Incorporate a goal/policy into the Specific Plan to develop an educational program with San Luis Obispo Regional Rideshare to provide occupants of uses with alternative transportation and smart commute information (e.g., transportation board, electronic kiosk, new hire packets, web portal, newsletters, social media, etc.).</td>
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<td>d. Implement circulation design elements in parking lots for non-residential uses to reduce vehicle queuing and improve the pedestrian environment.</td>
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<td>e. Exceed CALGreen standards for providing on-site bicycle parking at non-residential uses by 25%.</td>
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### AQ-2(a) Construction Activity Management Plan

Prior to the start of construction activities within the Plan Area, the project applicant shall prepare a CAMP to reduce construction-generated emissions. At a minimum, the CAMP shall incorporate SLOAPCD-recommended measures for the control of construction-generated emissions and shall be submitted to the city for review and approval with the grading permit application. If implementation of SLOAPCD-recommended Standard and BACT measures cannot reduce emissions below applicable SLOAPCD emissions thresholds, off-site mitigation may be required in coordination with SLOAPCD. The emission control measures and potential off-site mitigation requirements contained in the CAMP shall apply to all construction activities facilitated by the proposed Specific Plan. The CAMP shall include the following elements:

* a. A Dust Control Management Plan that encompasses all, but is not limited to, dust control measures;*
## Beechwood –Specific Plan Mitigation Monitoring and Reporting Program

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<tr>
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<td>b. Tabulation of on- and off-road construction equipment (age, horsepower and miles, and/or hours of operation);</td>
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<td>c. A schedule that restricts construction truck trips to non-peak hours to reduce peak-hour emissions;</td>
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<td>d. A limit on the length of the construction work-day period, if necessary;</td>
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<td>e. A schedule that phases construction activities, if appropriate; and</td>
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<td>f. Special provisions to address high heat and windy conditions.</td>
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<td>g. The Applicant shall hire an independent 3rd party ARB certified Visible Emissions Monitor to monitor dust emissions from the project site. The Monitor shall be available to respond to complaints or reports of visible dust leaving the property during construction, on nights, weekends and holidays to ensure dust from the construction site is not leaving the construction site. The Monitor will maintain a log of visible emission observations, which includes images taken of dust being generated on the property and will make that log available to APCD inspectors on request. Contact information for the Visible Emissions Monitor shall be submitted to the APCD prior to the start of on-site grading.</td>
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<td>h. Upon completion of CAMP item e (above) the Applicant shall report to the San Luis Obispo APCD the reasonable worst-case scenario construction phase emissions for the actual construction fleet. The report of actual construction fleet will also describe the application of BATC per MM AQ-2(C) below.</td>
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### AQ-2(b) Standard Control Measures for Construction Equipment.

The following standard mitigation measures shall be included in the CAMP and implemented during construction activities in the Plan Area to reduce construction-generated NOx, ROG, and DPM:

<table>
<thead>
<tr>
<th>Project</th>
<th>CDD</th>
<th>Construction equipment emission control measures shall be included on grading and building plans, as applicable. The project applicant shall submit proof of implementation</th>
<th>Prior to building permit issuance, the city shall verify that SLOAPCD approved measures related to construction equipment are shown on the project plans. During construction, compliance with the CAMP will be reviewed periodically during</th>
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### Beechwood –Specific Plan Mitigation Monitoring and Reporting Program

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<tr>
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<th>Type</th>
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<td>a.</td>
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<td>of SLOAPCD-approved measures.</td>
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<td>b.</td>
<td></td>
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<td>construction activities.</td>
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<td>c.</td>
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**AQ-2(c) Best Available Control Technology for Construction**

The following BACT for diesel-fueled construction equipment shall be included in the CAMP and implemented during construction activities in the Plan Area to reduce construction-generated ozone precursor:

- **Project**
- **CDD**
- **BACT measures shall be included in the CAMP and printed on grading and building plans, as applicable. The project**
- **The city shall verify compliance with CAMP requirements periodically during construction activities.**
<table>
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<tr>
<th>Mitigation Measure</th>
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<tr>
<td>emissions:</td>
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<td>applicant shall submit proof of implementation of SLOAPCD-approved measures before final inspection of grading.</td>
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<tr>
<td>a. Incorporate the use of newer off-road equipment with Tier 3 and Tier 4 engines where feasible;</td>
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<td>b. Repower older off-road equipment with Tier 3 and Tier 4 engines where feasible;</td>
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<tr>
<td>c. Utilize heavy-duty trucks meeting the standards of CARB’s Truck and Bus Regulation for on-road heavy-duty diesel engines, which requires nearly all trucks to have 2010 or newer model year engines; and</td>
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<tr>
<td>d. Install California Verified Diesel Emission Control Strategies. Examples include, but are not limited to, diesel particulate filter systems, Purifilter Engine Control Systems, diesel retrofit systems, and Sootfilter systems.</td>
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<tr>
<td>AQ-2(d) Architectural Coating</td>
<td>Project</td>
<td>CDD</td>
<td>Architectural coating measures shall be included in the project CAMP and printed on building plans, as applicable. The project applicant shall submit proof of implementation of SLOAPCD-approved measures before final inspection of grading.</td>
<td>The city shall verify compliance with CAMP requirements periodically during construction activities.</td>
</tr>
<tr>
<td>Construction of new development in the Plan Area shall use low VOC content paints not exceeding 50 grams per liter. To the extent locally available, prefinished building materials or materials that do not require the application of architectural coatings shall be utilized. This requirement shall be incorporated into the CAMP.</td>
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<tr>
<td>AQ-2(e) Idling Restrictions</td>
<td>Project</td>
<td>CDD</td>
<td>Idling restrictions shall be included on grading and building plans, as applicable. The project applicant shall submit proof of implementation of SLOAPCD-approved measures before final inspection of grading.</td>
<td>The city shall verify compliance with CAMP requirements periodically during construction activities.</td>
</tr>
<tr>
<td>The following measures shall be included in the CAMP and implemented to reduce construction emissions from on- and off-road construction equipment (NOx, ROG, and DPM). These measures shall be shown on grading and building plans:</td>
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<tr>
<td>a. Idling Restrictions Near Sensitive Receptors for Both On- and Off-Road Equipment.</td>
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<tr>
<td>i. Staging and queuing areas shall not be located within 1,000</td>
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### Mitigation Measure

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<th>Mitigation Measure</th>
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<td>feet of sensitive receptors;</td>
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<tr>
<td>ii. Diesel idling within 1,000 feet of sensitive receptors shall not be permitted;</td>
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<td>iii. Alternatively fueled equipment shall be utilized where feasible; and</td>
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<td>iv. Signs that specify the no-idling requirements shall be posted and enforced at the construction site.</td>
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<tr>
<td>b. <strong>Idling Restrictions for On-Road Vehicles.</strong> California Code of Regulations Title 13, Section 2485 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:</td>
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<tr>
<td>i. Shall not idle the vehicle’s primary diesel engine for greater than five minutes at any location, except as noted in subsection (d) of the regulation; and</td>
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<tr>
<td>ii. Shall not operate a diesel-fueled auxiliary power system (APS) to power a heater, air conditioner, or any ancillary equipment on that vehicle during sleeping or resting in a sleeper berth for greater than 5 minutes at any location when within 100 feet of a restricted area, except as noted in subsection (d) of the regulation. In addition, signs shall be posted in the designated queuing areas and job sites to remind drivers of the 5-minute idling limit. The specific requirements and exceptions in the regulation can be reviewed at the following website: <a href="http://www.arb.ca.gov/msprog/truck-idling/2485.pdf">www.arb.ca.gov/msprog/truck-idling/2485.pdf</a>.</td>
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<tr>
<td>c. <strong>Idling Restrictions for Off-Road Equipment.</strong> Off-road diesel equipment shall comply with the 5-minute idling restriction</td>
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**Beechwood – Specific Plan Mitigation Monitoring and Reporting Program**

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<tbody>
<tr>
<td>identified in Section 2449(d)(3) of CARB’s In-Use Off-Road Diesel regulation (<a href="http://www.arb.ca.gov/regact/2007/ordiesl07/froool.pdf">www.arb.ca.gov/regact/2007/ordiesl07/froool.pdf</a>). Signs shall be posted in the designated queuing areas and job sites to remind off-road equipment operators of the five-minute idling limit.</td>
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</table>

**AQ-2(f) Off-Site Mitigation**

Based on the estimated emissions identified in the CAMP, off-site mitigation approved by SLOAPCD shall be implemented to reduce construction-related emissions generated by stationary and mobile sources prior to the start of construction activities within the Plan Area. In accordance with SLOAPCD methodology, excess emissions shall be multiplied by the cost effectiveness of mitigation as defined in the state’s current Carl Moyer Incentive Program Guidelines to determine the annual off-site mitigation amount. The project applicant shall coordinate with SLOACPD to implement off-site reduction measures or pay the off-site mitigation amount plus an administration fee (to be determined by SLOAPCD) to SLOACPD to administer emission reduction projects. Off-site emissions reduction measures may include, but would not be limited to, developing a funding program to provide the following emissions-reducing improvements:

- a. Buy and scrap older heavy-duty diesel vehicles or equipment;
- b. Replace/repower transit buses;
- c. Replace/repower heavy-duty diesel school vehicles (i.e., bus, passenger, or maintenance vehicles);
- d. Retrofit or repower heavy-duty construction equipment or on-road vehicles;
- e. Replace/repower marine diesel engines;
- f. Repower or contribute to funding clean diesel locomotive main or auxiliary engines;

Construction emission reduction measures shall be included on grading and building plans, as applicable. As necessary, the project applicant shall submit proof of implementation of SLOAPCD-approved off-site mitigation measures before final inspection of grading.

The city shall verify compliance with CAMP requirements periodically during construction activities.
Beechwood – Specific Plan Mitigation Monitoring and Reporting Program

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<tr>
<td>g. Purchase Verified Diesel Emission Control Strategies for local school buses,</td>
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<tr>
<td>transit buses or construction fleets;</td>
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<tr>
<td>h. Install or contribute to funding alternative fueling infrastructure (i.e.,</td>
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<td>fueling stations for CNG, LPG, conductive and inductive electric vehicle charging,</td>
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<td>etc.); and</td>
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<tr>
<td>i. Expand existing transit services.</td>
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</table>

AQ-2(g) Fugitive Dust Control Measures
The following measures shall be implemented to reduce construction-generated fugitive dust. These measures shall be included in the CAMP shown on grading and building plans.

a. Reduce the amount of the disturbed area where possible.
b. Use water trucks, SLOAPCD-approved dust suppressants, or sprinkler systems in sufficient quantities to prevent airborne dust from leaving the site and from exceeding the SLOAPCD’s limit of 20% opacity for greater than 3 minutes in any 60-minute period. The 20% opacity limit is a measure of the visibility of dust emissions and typically corresponds to the level at which dust emissions become clearly visible to the average human eye. Increased watering frequency would be required whenever wind speeds exceed 15 miles per hour and during summer months (i.e., June through September). Reclaimed (non-potable) water should be used whenever possible. Please note that since water use is a concern due to drought conditions, the contractor or builder shall consider the use of a SLOAPCD-approved dust suppressant where feasible to reduce the amount of water used for dust control.
c. All dirt stockpile areas shall be sprayed with water or a SLOAPCD-approved dust suppressant daily as needed.

Project CDD Fugitive dust control measures shall be included on grading plans, as applicable. The project applicant shall submit proof of implementation of SLOAPCD-approved measures before final inspection of grading.
The city shall verify compliance with CAMP requirements periodically during construction activities.
<table>
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<tr>
<td>d. Permanent dust control measures identified in the approved project revegetation and landscape plans shall be implemented as soon as possible following completion of any soil disturbing activities;</td>
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<td>e. Exposed ground areas that are planned to be reworked at dates greater than one month after initial grading shall be sown with a fast-germinating, native erosion control seed mix and watered until vegetation is established.</td>
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<td>f. All disturbed soil areas not subject to revegetation shall be stabilized using approved chemical soil binders, jute netting, or other methods approved in advance by the City.</td>
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<td>g. All roadways, driveways, sidewalks, etc. to be paved shall be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used.</td>
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<tr>
<td>h. Vehicle speed for all construction vehicles shall not exceed 15 miles per hour on any unpaved surface at the construction site.</td>
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<tr>
<td>i. All trucks hauling dirt, sand, soil, or other loose materials shall be covered or shall maintain at least 2 feet of freeboard (minimum vertical distance between top of load and top of trailer) in accordance with California Vehicle Code Section 23114.</td>
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<td>j. Wheel washers shall be installed at the construction site entrance/exit, tires or tracks of all trucks and equipment leaving the site shall be washed, or other SLOAPCD-approved track-out prevention devices sufficient to minimize the track-out of soil onto paved roadways shall be implemented.</td>
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<td>k. Streets shall be swept at the end of each day if visible soil material is carried onto adjacent paved roads. Water sweepers with reclaimed water shall be used where</td>
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### Beechwood –Specific Plan Mitigation Monitoring and Reporting Program

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<td>feasible.</td>
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<td>l. The burning of vegetative material shall be prohibited.</td>
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<td>m. The contractor or builder shall designate a person or persons to monitor m. the</td>
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<td>fugitive dust emissions and enhance the implementation of the measures as</td>
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<td>necessary to minimize dust complaints, reduce visible emissions below 20% opacity,</td>
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<td>and to prevent transport of dust off-site. Their duties shall include holidays</td>
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<td>and weekend periods when work may not be in progress. The name and telephone</td>
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<td>number of such persons shall be provided to the SLOAPCD Compliance Division and</td>
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<td>the City prior to the start of any grading, earthwork or demolition.</td>
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<td>n. When applicable, portable equipment, 50 horsepower or greater, used during</td>
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<td>construction activities shall be registered with the statewide Portable Equipment</td>
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<td>Registration Program (issued by CARB) or be permitted by SLOAPCD. Such equipment</td>
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<td>may include power screens, conveyors, internal combustion engines, crushers,</td>
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<td>portable generators, tub grinders, trammel screens, and portable plants (e.g.,</td>
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<td>aggregate plant, asphalt plant, concrete plant).</td>
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**AQ-3 Land Use Emission Reduction Measures**

Prior to issuance of grading permits, the applicants for development projects in the Specific Plan area shall define and incorporate into the Olsen/South Chandler Ranch Specific Plan standard emission reduction measures from the SLOAPCD CEQA Air Quality Handbook to reduce ROG, NOX, DPM, and PM10 emissions below SLOAPCD threshold levels. Consistent with SLOAPCD guidance, land use emission reduction measures shall include, but would not be limited to:

- Install electric fireplace in place of U.S. EPA certified Tier 2 residential wood-burning appliances.
- Provide shade over 50 percent of parking spaces in parking areas for multi-family land uses and within Planning Area 16

The City shall verify that the Land Use Emission Reduction Measures are included on site and building plans prior to issuance of building permits.

The project applicant or applicants for individual developments within the Plan Area shall submit proof that the Land Use Emission Reduction Measures have been implemented to the maximum extent feasible, or proof that implementation of one or more measures is infeasible.
Beechwood – Specific Plan Mitigation Monitoring and Reporting Program

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<tr>
<td>(see Figure 2-5 in Section 2, Project Description) to reduce evaporative emissions from parked vehicles. Shade may be provided by trees, overhangs, shading structures, or other means, as appropriate.</td>
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<tr>
<td>Reduce fugitive dust from roads and parking areas with the use of paving or other materials.</td>
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<td>Implement driveway design standards (e.g., speed bumps, curved driveway) for self-enforcement of reduced speed limits on unpaved driveways.</td>
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<tr>
<td>Use a SLOAPCD-approved suppressant on private unpaved roads leading to the site, unpaved driveways and parking areas applied at a rate and frequency that ensures compliance with SLOAPCD Rule 401 (Visible Emissions) and ensures off-site nuisance impacts do not occur.</td>
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<td>Encourage non-residential land uses to provide a childcare facility on-site.</td>
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<td>Meet or exceed applicable building standards at the time of development for building energy efficiency with a goal of achieving zero net energy (ZNE) buildings.</td>
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<td>Meet or exceed applicable building standards at the time of development for utilizing recycled content materials.</td>
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<tr>
<td>Meet or exceed applicable building standards at the time of development for reducing cement use in the concrete mix as allowed by local ordinance and conditions.</td>
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<tr>
<td>Meet or exceed applicable building standards for the use of greywater, rainwater or recycled water.</td>
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<td>Meet or exceed applicable building standards at the time of development for using shading, trees, plants, cool roofs, etc. to reduce the “heat island” effect.</td>
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<td>All built-in appliances shall comply with California Title 20, Appliance Efficiency Regulation.</td>
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<tr>
<td>Utilize on-site renewable energy systems (e.g., solar, wind, geothermal, biomass, and/or biogas) sufficient to meet or exceed applicable building standards at the time of development with a goal of achieving ZNE buildings.</td>
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<td>Design roof trusses to handle dead weight loads of</td>
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### Beechwood –Specific Plan Mitigation Monitoring and Reporting Program

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<td>standard solar-heated water and photovoltaic panels.</td>
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<tr>
<td><strong>AQ-4 Demolition Emission Control Measures</strong></td>
<td>Project</td>
<td>CDD; SLOAPCD</td>
<td>The project applicant or developers of individual projects in the Specific Plan area shall submit proof that SLOAPCD has been notified prior to demolition activities, as necessary, and that paint waste has been evaluated by a qualified hazardous materials inspector and handled according to their recommendations.</td>
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<tr>
<td>The following mitigation measures shall be implemented to reduce the disturbance of ACM and lead-coated materials.</td>
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<td>Prior to issuance of demolition permit(s) the city shall verify proper notification to SLOAPCD of asbestos work.</td>
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<tr>
<td>a. Demolition of on-site structures (i.e., residential units and associated outbuildings) shall comply with the procedures required by the NESHAP requirements (40 CFR 61, Subpart M) for the control of asbestos emissions during demolition activities. SLOAPCD is delegated authority by the USEPA to implement the Federal Asbestos NESHAP. Prior to demolition of on-site structures, SLOAPCD shall be notified, per NESHAP requirements.</td>
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<tr>
<td>b. If, during the demolition of existing structures (i.e., residential units and associated outbuildings), paint is separated from the construction materials (e.g., chemically or physically), the paint waste shall be evaluated independently from the building material by a qualified hazardous materials inspector to determine its proper management. All hazardous materials shall be handled and disposed of in accordance with local, state and federal regulations. According to the Department of Toxic Substances Control (DTSC), if the paint is not removed from the building material during demolition (and is not chipping or peeling), the material can be disposed of as non-hazardous construction debris. The landfill operator shall be contacted prior to disposal of building material debris to determine any specific requirements the landfill may have regarding the disposal of lead-based paint materials. The disposal of demolition debris shall comply with any such requirements. Approval of a lead work plan and permit may be required. Lead work plans, if required, shall be submitted to the SLOAPCD 10 days prior to the start of demolition.</td>
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<tr>
<td><strong>AQ-5 Valley Fever Suppression Measures</strong></td>
<td>Project</td>
<td>CDD; County Public Health</td>
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<td>Prior to initiating any grading, the project</td>
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<tr>
<td>The project applicant and contractor(s) shall implement the following measures during construction activities to reduce impacts related to Valley Fever.</td>
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<tr>
<td>a. If peak daily wind speeds exceed 15 miles per hour or peak daily temperatures exceed 95°F for 3 consecutive days, additional dust suppression measures (such as additional water or the application of additional soil stabilizer) shall be implemented prior to and immediately following ground-disturbing activities. The additional dust suppression shall continue until winds are 10 miles per hour or lower and outdoor air temperatures are below a peak daily temperature of 90°F for at least 2 consecutive days.</td>
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<tr>
<td>b. Heavy construction equipment traveling on un-stabilized roads within the Plan Area shall be preceded by a water truck to dampen roadways and reduce dust from transportation along such roads.</td>
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<tr>
<td>c. The project developer(s) shall notify the City and the County Public Health Department not more than 60 nor less than 30 days before construction activities commence to allow the Public Health Department opportunity to provide educational outreach to community members and medical providers, as well as enhanced disease surveillance in the area both during and after construction activities involving grading.</td>
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<td>d. Prior to any project grading activity, the project construction contractor(s) shall prepare and implement a worker training program that describes potential health hazards associated with Valley Fever, common symptoms, proper safety procedures to minimize health hazards, and notification procedures if suspected work-related symptoms are identified during construction, including the fact that certain ethnic groups and immune-compromised persons are at greater risk of becoming ill with Valley Fever. The objective of the training shall be to ensure the workers are aware of the danger associated with Valley Fever. The worker training program applicant shall provide the City and the County Public Health Department with copies of all educational training material for review and approval.</td>
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<td>Prior to initiating any grading the City shall verify that Developers of individual projects in the Plan Area submit proof that the County Public Health Department has been notified prior to commencement of construction activities, a worker training program has been conducted, and the educational handout has been mailed to existing residences within 3 miles of the Plan Area.</td>
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</table>
### Beechwood –Specific Plan Mitigation Monitoring and Reporting Program

| Mitigation Measure                                                                                                                                                                                                 | Timing/Remarks                                                                                       |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| shall be included in the standard in-person training for project workers and shall identify safety measures to be implemented by construction contractors during construction. Prior to initiating any grading, the project applicant shall provide the City and the County Public Health Department with copies of all educational training material for review and approval. No later than 30 days after any new employee or employees begin work, the project applicant shall submit evidence to the city that each employee has acknowledged receipt of the training (e.g., sign-in sheets with a statement verifying receipt and understanding of the training). |                                                                                                       |
| e. The applicant shall work with a medical professional, in consultation with the County Public Health Department, to develop an educational handout for on-site workers and surrounding residents within 3 miles of the project site that includes the following information on Valley Fever:                                                                                      | Prior to construction permit issuance, this handout shall have been created by the applicant and reviewed by the City. No less than 30 days prior to any surface disturbance (e.g., grading, filling, trenching) work commencing, this handout shall be mailed to all existing residences within 3 miles of the Plan Area. |
| i. Potential sources/causes                                                                                                                                                                                        |                                                                                                       |
| ii. Common symptoms                                                                                                                                                                                                 |                                                                                                       |
| iii. Options or remedies available should someone be experiencing these symptoms                                                                                                                                 |                                                                                                       |
| iv. The location of available testing for infection                                                                                                                                                                |                                                                                                       |

### BIO-1(a) San Joaquin Kit Fox Impact Compensatory Mitigation
Compensatory mitigation for the removal of SJKF habitat shall be provided at a ratio of not less than 3:1 (area mitigated: area impacted) consistent with the County of San Luis Obispo standard mitigation ratio for SJKF at the project location (San Luis Obispo County, 2007) and evaluation conducted by Althouse and Meade (Appendix D). Compensatory mitigation shall be accomplished through one of the

<table>
<thead>
<tr>
<th>Project</th>
<th>Qualified Biologist; CDD; CDFW; USFWS</th>
<th>The Owner/Applicant shall calculate the total acreages required to meet all compensatory mitigation obligations and submit these totals to the City, CDFW, and USFWS.</th>
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<td>Prior to issuance of grading permits, the Owner/Applicant shall provide documentation to the city that one or a combination of the above mitigation alternatives has been implemented and that compensatory mitigation obligations have been met. For options 1 and 3, the</td>
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three following methods:

a. The Owner/Applicant shall establish an on-site and/or offsite conservation easement of suitable size to offset impacts to SJKF habitat at a ratio of not less than 3:1 (area mitigated: area impacted) and shall be located in the SJKF corridor area (e.g., within the San Luis Obispo County SJKF habitat area northwest of Highway 58). Mitigation areas shall contain equal or greater SJKF habitat value than those impacted. Compensatory mitigation areas shall have a restrictive covenant prohibiting future development/disturbance and shall be managed in perpetuity to encourage persistence and enhancement of SJKF. Compensatory mitigation lands cannot be located on land that is currently held publicly for resource protection. The compensatory mitigation areas shall be managed by a conservation lands management entity or other qualified easement holder. The Owner/Applicant shall provide fees sufficient to cover administrative costs incurred in the creation of the conservation easement (appraisal, documenting baseline conditions, etc.) and funds in the form of a non-wasting endowment to cover the cost of monitoring and enforcing the terms of the conservation easement in perpetuity. Lands to be conserved as well as determination of a qualified easement holder will be subject to the review and approval of CDFW, USFWS, and the City.

b. If acceptable by the City, CDFW, and USFWS, funds shall be deposited into an approved in-lieu fee program, which would provide for the protection in perpetuity of suitable habitat in the SJKF corridor area within San Luis Obispo County which can be completed by providing funds to The Nature Conservancy (TNC) pursuant to the San Luis Obispo County SJKF Voluntary Fee-Based Compensatory Mitigation Program (Program). The fee would be determined based on the current (at time of grading permit application) cost-per-unit, per acre of mitigation.

c. The Owner/Applicant shall purchase credits at a USFWS and CDFW-approved conservation bank, specifically the Palo Prieto Conservation Bank. The total fee would be determined based...
**Beechwood – Specific Plan Mitigation Monitoring and Reporting Program**

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<tr>
<th>Mitigation Measure</th>
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<td>on the current (at time of grading permit application) cost-per-credit, per acre of mitigation.</td>
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<tr>
<td><strong>BIO-1(b) San Joaquin Kit Fox Impact Avoidance and Minimization</strong></td>
<td>Project</td>
<td>Qualified Biologist; CDD</td>
<td>The city shall review and approve documentation of compliance with the conditions outlined in the measure.</td>
<td>The components of this measure shall be implemented prior to issuance of grading permits and/or initiation of site disturbance/construction.</td>
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<tr>
<td><strong>The Owner/Applicant shall ensure the following actions are implemented to avoid and minimize potential impacts to San Joaquin Kit Fox:</strong></td>
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<tr>
<td>a. Prior to issuance of grading and/or construction permits, the Owner/Applicant shall provide evidence that they have retained a qualified biologist acceptable to the city. The qualified biologist shall perform the following monitoring activities:</td>
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<tr>
<td>i. Prior to issuance of grading and/or construction permits and within 30 days prior to initiation of site disturbance and/or construction, a qualified biologist shall conduct a pre-activity (i.e., pre-construction) survey for known or potential kit fox dens and submit a letter to the city reporting the date the survey was conducted, the survey protocol, survey results, and what measures were necessary (and completed), as applicable, to address any kit fox activity within the project limits.</td>
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<tr>
<td>ii. The qualified biologist shall conduct weekly site visits during site-disturbance activities (i.e., grading, trenching, diskng, excavation, stock piling of dirt or gravel, etc.) that proceed longer than 14 days. Site disturbance activities lasting up to 14 days do not require weekly monitoring by the biologist unless observations of kit fox or their dens are made on-site or the qualified biologist recommends monitoring for some other reason. When weekly monitoring is required, the biologist shall submit weekly monitoring reports to the city.</td>
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<tr>
<td>iii. Prior to or during project activities, if any observations are made of SJKF, or any known or potential SJKF dens are discovered within the project limits work shall stop and the qualified biologist shall re-assess the probability of incidental take (e.g., harm or death) to SJKF. At the time a den is discovered, the biologist shall contact USFWS and</td>
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the CDFW for guidance on possible additional SJKF protection measures to implement and whether or not a Federal and/or state incidental take permit is needed. If a potential den is encountered during construction, work shall stop until such time the USFWS/CDFW determines it is appropriate to resume work.

b. If incidental take of SJKF during project activities is determined to be possible by the qualified biologist before project activities commence, the Owner/Applicant must consult with the USFWS and CDFW. Work shall not commence until the Owner/Applicant has obtained all necessary permits and approvals and shall implement measures as required by these permits and approvals. In addition, the qualified biologist shall implement the following measures:

i. Within 30 days prior to initiation of site disturbance and/or construction, fenced exclusion zones shall be established around all known and potential SJKF dens as defined in the Standardized Recommendations for Protection of the San Joaquin Kit Fox Prior to or During Ground Disturbance (USFWS 1999). Exclusion zone fencing shall consist of either large flagged stakes connected by rope or cord, or survey laths or wooden stakes prominently flagged with survey ribbon. Each exclusion zone shall be roughly circular in configuration with a radius of the following distance measured outward from the den or burrow entrances:
   • Potential kit fox den: 50 feet
   • Known or active kit fox den: 100 feet
   • Kit fox pupping den: 150 feet

ii. All foot and vehicle traffic, as well as all construction activities, including storage of supplies and equipment, shall remain outside of exclusion zones. Exclusion zones shall be maintained until all project-related disturbances have been terminated, and then shall be removed.

iii. If SJKF or known or potential SJKF dens are found on site, daily monitoring by a qualified biologist shall be required during ground disturbing activities.
### Beechwood –Specific Plan Mitigation Monitoring and Reporting Program

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<tr>
<td>c. Prior to issuance of grading and/or construction permits, the Owner/Applicant shall clearly delineate the following as a note on the project plans: “Speed signs of 25 mph (or lower) shall be posted for all construction traffic to minimize the probability of road mortality of the San Joaquin kit fox”. Speed limit signs shall be installed in the Specific Plan area within 30 days prior to initiation of site disturbance and/or construction.</td>
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<tr>
<td>d. Prior to issuance of grading and/or construction permit and within 30 days prior to initiation of site disturbance and/or construction, all personnel associated with the project shall attend a worker education training program, conducted by a qualified biologist, to avoid or reduce impacts on sensitive biological resources including SJKF. At a minimum, as the program relates to SJKF, the training shall include the SJKF life history, all mitigation measures specified by the city, USFWS and CDFW (if applicable), as well as any related biological report(s) prepared for the project. The Owner/Applicant shall notify the city shortly prior to this meeting. A SJKF fact sheet shall also be developed prior to the training program, and distributed at the training program to all contractors, employers and other personnel involved with the construction of the project.</td>
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During the site disturbance and/or construction phase, grading and construction activities after dusk shall be prohibited unless coordinated through the city, during which additional SJKF mitigation measures may be required.

### BIO-1(c) Western Spadefoot Impact Avoidance and Minimization
The Owner/Applicant shall ensure the following actions are implemented to avoid and minimize potential impacts to western spadefoot:

a. For work conducted during the western spadefoot migration and breeding season (November 1 to May 31), a qualified biologist will survey the active work areas (including access roads) in mornings following measurable precipitation events. Construction may commence once the biologist has confirmed that no western spadefoot (any life stage) are in the work area.

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<tr>
<td>Project</td>
<td>Qualified Biologist; CDD</td>
<td>The city shall review and approve documentation of compliance with the conditions outlined in the measure.</td>
<td></td>
<td>During construction, if wet weather conditions occur between November 1 and May 31 a qualified biologist is required to survey active work areas for western spadefoot (any life stage). During construction and ongoing throughout project construction, components a through c of this measure shall be implemented.</td>
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Beechwood – Specific Plan Mitigation Monitoring and Reporting Program

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<td>b.</td>
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<td>Qualified Biologist; CDD</td>
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<td>c.</td>
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**BIO-1(d) Pallid Bat and Townsend’s Big-Eared Bat Impact Avoidance and Minimization**

The Owner/Applicant shall ensure the following actions are implemented to avoid and minimize potential impacts to special status bat species:

- a. Upon project approval and prior to construction (including tree removal and demolition of structures), a qualified biologist shall conduct a survey of all trees and structures in the Specific Plan area to determine if roosting bats are present during the non-breeding season (November through March). The biologist shall also have access to all interior attics, as needed. If a colony of bats is found roosting in any tree or structure, further surveys shall be conducted sufficient to determine the species present and the type of roost (day, night, maternity, etc.). If the bats are not part of an active maternity colony, passive exclusion measures may be implemented with approval from CDFW. Exclusions shall occur outside the breeding season (typically May through August) and winter hibernation (typically December through February).

- b. If bats are roosting in tree cavities or structures in the Specific

The city shall review and approve the survey results and provide confirmation of compliance with the conditions outlined in the measure. The city shall review and approve the Owner/Applicant’s methodology and rationale for excluding bats prior to implementation of the exclusion.

Surveys and exclusion must be completed prior to issuance of grading or demolition permits. The survey results and exclusion methodology and results must be submitted to the city within one week of the survey. The Owner/Applicant shall consult with a qualified biologist to determine if a bat proposed for exclusion is breeding (if conducted during the typical breeding season) or hibernating (if conducted during the typical winter hibernation season) and provide the rationale to the city for approval prior to implementing the exclusion.
### Beechwood – Specific Plan Mitigation Monitoring and Reporting Program

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<tr>
<td>Plan area during the daytime but are not part of an active maternity colony, then exclusion measures must include one-way valves that allow bats to get out but are designed so that the bats may not re-enter the structure. If a bat colony is excluded, appropriate alternate bat habitat shall be installed in or adjacent to the Specific Plan area. For each occupied roost removed, one bat box shall be installed in similar habitat and should have similar cavity or crevices properties to those which are removed, including access, ventilation, dimensions, height above ground, and thermal conditions. The location and design of the bat box(es) shall be subject to approval by the city in coordination with a qualified biologist. Active maternal bat colonies may not be disturbed during the pupping season (April through July).</td>
<td>Project</td>
<td>Qualified Biologist; CDD</td>
<td>The City shall review and approve the survey results and provide confirmation of compliance with the conditions outlined in the measure. The City shall review and approve the Owner/Applicant’s methodology prior to implementation of the relocation.</td>
<td>Prior to construction, qualified biologist shall biologist determine presence or absence of legless lizard in the project areas. Survey results and relocation methodology must be submitted to the City within 1 week of the survey. The city shall review and approve the survey results and provide confirmation of compliance with the conditions outlined in the measure. The city shall ensure the avoidance buffers are established and maintained as needed.</td>
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</tbody>
</table>
| BIO-1(e) Northern California Legless Lizard Impact Avoidance and Minimization | A preconstruction survey for legless lizards shall be conducted around the base of oak trees in proposed work areas immediately prior to ground-disturbing activities or tree removal. The preconstruction survey shall be conducted by a qualified biologist familiar with legless lizard ecology and survey methods, and with approval from the CDFW to relocate legless lizards out of harm’s way. The scope of the survey shall be determined by a qualified biologist and shall be sufficient to determine presence or absence in the project areas. If the focused survey results are negative, a letter report shall be submitted to the City, and no further action shall be required. If legless lizards are found to be present in the proposed work areas the following steps shall be taken: 
  a. Legless lizards shall be captured by hand by the project biologist and relocated to an appropriate location well outside the project areas. 
  b. Construction monitoring shall be required for all new ground-disturbing activities located within legless lizard habitat (under tree canopies with leaf litter or thatch). Biologists shall capture and relocate legless lizards as specified above. | Project | Qualified Biologist; CDD | The City shall review and approve the survey results and provide confirmation of compliance with the conditions outlined in the measure. The City shall review and approve the Owner/Applicant’s methodology prior to implementation of the relocation. | Prior to construction, qualified biologist shall biologist determine presence or absence of legless lizard in the project areas. Survey results and relocation methodology must be submitted to the City within 1 week of the survey. The city shall review and approve the survey results and provide confirmation of compliance with the conditions outlined in the measure. The city shall ensure the avoidance buffers are established and maintained as needed. |
### Beechwood – Specific Plan Mitigation Monitoring and Reporting Program

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<tr>
<td><strong>c.</strong> A letter report shall be submitted to the City and CDFW within 30 days of legless lizard relocation, or as directed by CDFW.</td>
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<tr>
<td><strong>BIO-1(f) Nesting Birds Impact Avoidance and Minimization</strong></td>
<td>Project</td>
<td>Applicant retain Qualified Biologist to perform survey; CDD</td>
<td></td>
<td>Within one week of ground disturbance or vegetation removal activities, if work occurs between March 15 and August 15, nesting bird surveys shall be conducted. The survey shall be submitted to the city within one week of conducting the survey. The Owner/Applicant shall establish avoidance buffers prior to commencement of construction activities, as required.</td>
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<tr>
<td>If initial ground-disturbing activities and vegetation removal occur during the typical avian nesting period, between March 15 and August 15, nesting bird surveys shall be conducted by a qualified biologist within 1 week prior to initial ground-disturbing activities or removal of vegetation. Surveys shall continue to be conducted within the timeframes specified above until all vegetation removal activities are completed. If surveys do not locate nesting birds, construction activities may be conducted. If nesting birds are located, no construction activities shall occur within 100 feet of nests of passerine species and 300 feet of nests of raptor species until chicks are fledged. A preconstruction survey report shall be submitted to the City immediately upon completion of the survey. The report shall detail appropriate fencing or flagging of the buffer zone and make recommendations on additional monitoring requirements. A map of the Specific Plan area and nest locations shall be included with the report. The biologist conducting the nesting survey shall have the authority to reduce or increase the recommended buffer depending upon site conditions.</td>
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<tr>
<td><strong>BIO-1(g) Worker Environmental Awareness Program Training</strong></td>
<td>Project</td>
<td>Qualified Biologist; CDD</td>
<td>The training shall occur prior to construction activities.</td>
<td>Prior to construction activities, the Owner/Applicant shall conduct the worker awareness training. The signed form of all attendees shall be provided to the city within one week of the training. The city shall verify that the worker awareness program conforms to the required conditions.</td>
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### Beechwood – Specific Plan Mitigation Monitoring and Reporting Program

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<tr>
<td>BIO-2(a) Agency Coordination</td>
<td>Project</td>
<td>Qualified Biologist; CDD</td>
<td>The City shall ensure that grading permits conform to the conditions of any permits issued by state and federal agencies.</td>
<td>The applicant shall submit copies of correspondence and/or permits (as applicable) with applicable agencies to the City prior to issuance of grading permits.</td>
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<tr>
<td>BIO-2(b) Wetland and Drainage Mitigation</td>
<td>Project</td>
<td>Qualified Biologist; CDD</td>
<td>?</td>
<td>The HMMP shall be submitted to and approved by the City prior to issuance of grading permits. The Owner/Applicant shall contract with a qualified biologist to prepare and submit annual monitoring reports to the City. The City shall review the monitoring reports and determine whether the restoration has successfully mitigated for impacts to wetlands, drainages, and associated riparian habitat at the required ratio.</td>
</tr>
<tr>
<td>BIO-2(c) Jurisdictional Areas Best Management Practices During Construction</td>
<td>Project</td>
<td>Qualified Biologist; CDD</td>
<td>Existing wetlands, Access routes, staging, and construction areas shall be shown on proposed project plans.</td>
<td>These measures shall be implemented during grading and construction and shall be included on all land use, grading, and building plans. The Owner/Applicant shall retain a qualified biologist to assist with the preparation of plans, monitor compliance with the above measures, and provide to monthly monitoring reports to</td>
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### Beechwood –Specific Plan Mitigation Monitoring and Reporting Program

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<td>a. Access routes, staging, and construction areas shall be limited to the minimum area necessary to achieve the project goal and minimize impacts to other waters (federal and state) including locating access routes and ancillary construction areas outside of jurisdictional areas.</td>
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<td>the City to document compliance.</td>
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<tr>
<td>b. To control erosion and sediment runoff during and after project implementation, appropriate erosion control materials shall be deployed and maintained to minimize adverse effects on jurisdictional areas in the vicinity of the project.</td>
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<td>c. Project activities within the jurisdictional areas should occur during the dry season (typically between May 1 and September 30) in any given year, or as otherwise directed by the regulatory agencies. Deviations from this work window can be made with permission from the relevant regulatory agencies.</td>
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<td>d. During construction, no litter or construction debris shall be placed within jurisdictional areas. All such debris and waste shall be picked up daily and properly disposed of at an appropriate site.</td>
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<td>e. All project-generated debris, building materials, and rubbish shall be removed from jurisdictional areas and from areas where such materials could be washed into them.</td>
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<tr>
<td>f. Raw cement, concrete or washings thereof, asphalt, paint or other coating material, oil or other petroleum products, or any other substances that could be hazardous to aquatic species resulting from project-related activities shall be prevented from contaminating the soil and/or entering jurisdictional areas.</td>
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<td>g. All refueling, maintenance, and staging of equipment and vehicles shall occur at least 100 feet from bodies of water and in a location where a potential spill would not drain directly toward aquatic habitat (e.g., on a slope that drains away from the water source). Prior to the onset of work activities, a plan</td>
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<tr>
<td>BIO-5(a) Oak Tree Compensatory Mitigation</td>
<td>Project</td>
<td>Qualified Biologist; CDD</td>
<td>Mitigation replacement trees shall be shown on plans.</td>
<td>During construction, the replacement trees shall be installed during the construction phase in which they are impacted or removed. The Owner/Applicant shall submit the annual reports to the City by December 31 of each year of monitoring. The City shall review and approve the annual monitoring reports from the Arborist.</td>
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**BIO-5(a) Oak Tree Compensatory Mitigation**

The Owner/Applicant shall ensure the following actions are implemented to compensate for impacts to protected oak trees:

- **a.** Impacted oaks shall be mitigated for by planting one 24-inch boxed tree with at least a 1.5-inch diameter for impacts less than 50% of the critical root zone (CRZ; area of root space that is within a circle circumscribed around the trunk of a tree using a radius of 1 foot per inch diameter at breast height [DBH]) as defined by the City of Paso Robles Oak Tree Protection Ordinance. Two 24-inch boxed trees shall be planted for trees with impacts of 50% or greater of the tree. The mitigation trees shall be planted within the Specific Plan Area and incorporated into the landscape plan. If boxed trees are not available, or are not sourced from California’s central coast region, smaller caliper trees may be planted at a ratio of 5:1 for each tree removed. Additional trees may be planted from acorns collected onsite, protected from below and above-ground browse damage, and counted as mitigation trees if they reach a height of 3 feet by Year 7 and exhibit high vigor.

- **b.** Oak trees removed by the project shall be replaced in accordance with the City of Paso Robles Oak Tree Protection Ordinance. Replacement oaks for removed trees must be equivalent to 25% of the diameter of the removed tree(s). For example, the replacement requirement for removal of two trees of 15 inches DBH (30 total diameter inches), would be 7.5 inches (30 inches removed × 0.25 replacement factor). This requirement could be satisfied by planting five 1.5-inch trees, or three 2.5-inch trees, or any other combination totaling 7.5 inches. A minimum of two 24-inch box, 1.5-inch trees shall be planted for each tree removed.
### BIO-5(b) Oak Tree Protection

The Owner/Applicant shall ensure the following actions are implemented to avoid and minimize potential impacts to protected oak trees:

a. Tree canopies and trunks within 50 feet of proposed disturbance zones shall be mapped and numbered by a City-approved arborist or biologist and a licensed land surveyor. Data for each tree shall include date, species, number of stems, DBH of each stem, CRZ diameter, canopy diameter, tree height, health, habitat notes, and nests observed.

b. An oak tree protection plan shall be prepared and approved by the City that outlines the specific tree protection measures that will apply to each protected oak tree in the Specific Plan Area.

c. Impacts to the oak canopy or CRZ shall be avoided where practicable. Impacts include pruning, any ground disturbance within the dripline or CRZ of the tree (whichever distance is greater), and trunk damage.

d. Protective fencing shall be installed at the edge of the CRZ or line of encroachment for each tree or group of trees that will not be removed. The fence shall be installed before any construction or earth moving begins. The proposed fencing shall be shown on the grading plan. It must be a minimum of

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<td>Required for each oak tree removed.</td>
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<td>c. Replacement trees shall be seasonally maintained (browse protection, weed reduction and irrigation, as needed) and monitored annually for at least 7 years by a City-approved arborist. The arborist shall prepare an annual report detailing the condition of each replacement tree and any maintenance activities conducted. Any trees that are dead or in decline during the 7-year monitoring will be replaced and monitored for an additional 7 years after the replacement is planted.</td>
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The Owner/Applicant shall retain a City-approved arborist or biologist to monitor compliance with the Oak Tree Protection measures.

Prior to issuance of grading permit the City shall review project plans to ensure tree protection measures are included on the plans.

During construction phases the selected contractor is responsible for maintaining the protective fencing, signage and clearance within the CRZ.

Signage placed at 50ft intervals along protective fencing shall read: "Tree Protection Zone: No personnel, equipment, materials, or vehicles allowed."
### Beechwood – Specific Plan Mitigation Monitoring and Reporting Program

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<td>4-foot-high chain link, snow, or safety fence staked (with t-posts 8 feet on center). The Owner/Applicant shall be responsible for maintaining an erect fence throughout the construction period. The arborist(s), upon notification, will inspect the fence placement once it is erected. After this time, fencing shall not be moved without arborist inspection/approval. If the orange plastic fencing is used, a minimum of four zip ties shall be used on each stake to secure the fence. Weatherproof signs shall be permanently posted on the fences every 50 feet, with the following information: “Tree Protection Zone: No personnel, equipment, materials, or vehicles allowed.”</td>
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<td>e. Oil, gasoline, chemicals, and other construction materials or equipment that might be harmful to oak trees shall not be stored within the CRZ of the tree.</td>
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<td>f. Slopes and drains shall be installed according to City specifications so as to avoid harm to the oak trees due to excess watering. All impacts within the CRZ (e.g., grading, trenching, pruning, utility placement) shall be supervised by a certified arborist approved by the City or the arborist’s designated biologist.</td>
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<td>g. Damage to any tree during construction shall be immediately treated, as appropriate, by an arborist approved by the City to prevent disease or pest infestation. Damage will be reported to the City during each month of construction. The property owner shall be responsible for correcting any damage to oak trees on the property in a manner specified by an arborist approved by the City at the Owner/Applicant’s expense.</td>
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<tr>
<td>h. No paint thinner, paint, plaster, or other liquid or solid excess or waste construction materials or wastewater shall be dumped on the ground or into any grate between the outer edge of the CRZ and the base of the oak trees, or uphill from any oak tree where such substance might reach the roots.</td>
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**Beechwood –Specific Plan Mitigation Monitoring and Reporting Program**

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<td>through a leaching process.</td>
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<tr>
<td>i. Wires, signs, and other similar items shall not be attached to the oak trees.</td>
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<td>j. All root pruning shall be completed with sharpened hand pruners. Pruned roots shall be immediately covered with soil or moist fabric.</td>
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<td>k. Oak tree impacts, record of treatment, and protection methods shall be included in a monthly report to the City during active construction periods.</td>
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**CUL-1(c)  Unanticipated Discovery of Archeological Resources**

If, during the course of ground-disturbing activities in the Project area, unidentified human remains are unearthed, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission (NAHC).

| Project Qualified Archeologist; CDD | Project Qualified Archeologist; CDD | The requirements for unanticipated discovery of archeological resources shall be included on any Project related Grading Plans and/or demolition specifications. | Building Permit Review/ Construction Permit Authorization. |

**CR-1(a)  Unanticipated Discovery of Archeological Resources**

In the event archaeological resources are unearthed during project construction, all earth disturbing work within the vicinity of the find must be temporarily suspended or redirected until a qualified archaeologist has evaluated the nature and significance of the find. After the find has been appropriately mitigated, work in the area may resume. A Native American representative should monitor any mitigation work associated with prehistoric cultural material. Upon completion of mitigation activities, the Project archaeologist will determine if full time or spot-checking monitoring is required. The archaeologist shall submit a mitigation/monitoring report documenting the finds, mitigation work and monitoring (if applicable) to the City to confirm that this mitigation measure has been met.

| Project Qualified Archeologist; CDD | Project Qualified Archeologist; CDD | The requirements shall be included on any Project related Grading Plans and/or demolition specifications. | Building Permit Review/ Construction Permit Authorization. |

**E-2. Mitigation Measure GHG-1 described in Section IV.I, Air Quality and Greenhouse Gas Emissions, would require the project to incorporate all “mandatory” measures in the City’s CAP.**

| Project CDD /APCD | Project CDD /APCD | See AQ mitigation measures for the mandatory measures that shall be applied to the project. | |

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## Beechwood –Specific Plan Mitigation Monitoring and Reporting Program

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<tr>
<td>GEO-2 Moisture Conditioning &amp; Fill Compaction</td>
<td>Project</td>
<td>Qualified Geotechnical Engineer; CDD</td>
<td>Geotechnical Engineering report shall be included in project specifications.</td>
<td>Prior to issuance of building permit the City shall verify Geotechnical Specifications are a part of project plans. During construction the Geotechnical Engineer shall perform observation and testing as necessary to ensure that grading operations conform the recommendations of the Geotechnical Report to the satisfaction of the City Engineer.</td>
</tr>
<tr>
<td>GEO-3 Geotechnical Report Measures</td>
<td>Project</td>
<td>Qualified Geotechnical Engineer; CDD</td>
<td>Geotechnical Engineering report shall be included in project specifications.</td>
<td>Prior to issuance of Building Permits, City Engineer shall review the Geotechnical Report</td>
</tr>
<tr>
<td>GEO-4(a) Worker Paleontological Resource Awareness Session</td>
<td>Project</td>
<td>Qualified Geotechnical Engineer; CDD</td>
<td>The Applicant shall demonstrate that the worker awareness program conforms to the required conditions to the satisfaction of the City.</td>
<td>The Applicant shall provide City compliance monitoring staff with the name and contact information for the qualified paleontologist prior to grading/building permit issuance and pre-construction meeting. Prior to issuance of grading permit, the worker awareness program shall be reviewed and approved by the City.</td>
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<td>project development, and as new employees are added to the project site workforce. The qualified paleontologist shall provide awareness session sign-in sheets documenting employee attendance to the city for review as requested.</td>
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<tr>
<td><strong>GEO-4(b) Paleontological Monitoring and Handling of Resources Inadvertently Discovered During Grading</strong></td>
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<td>If unrecorded paleontological resources are uncovered during ground disturbance or construction activities, the Applicant, under the direction of the qualified consultant identified in Mitigation Measure GEO-3(a) shall:</td>
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<td>a. A Project Paleontologist (meeting SVP standards) will prepare a Paleontological Resources Monitoring and Mitigation Plan (PRMMP). This plan will address specifics of monitoring and mitigation and comply with the recommendations of the SVP, and shall include:</td>
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<td>i. Temporarily halt construction or excavation activities within 50 feet of the find and redirect activity to other work areas;</td>
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<td>ii. Immediately notify the city regarding the resource and redirected grading activity; and</td>
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<td>iii. Obtain the services of a professional paleontologist who shall assess the significance of the find and provide recommendations as necessary for its proper disposition for review and approval by the City of Paso Robles. All significance assessment and mitigation of impacts to the paleontological resource and verification shall be reviewed by the City of Paso Robles prior to resuming grading in the area of the find. Mitigation may involve preservation in place or documentation and excavation of the resource</td>
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<tr>
<td><strong>GHG-2 Greenhouse Gas Emission Reduction Measures</strong></td>
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<td>The project applicant shall retain a third-party greenhouse gas consultant to...</td>
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<tr>
<td>The applicant shall incorporate into the Beechwood Specific Plan GHG emission reduction measures that are consistent with the “mandatory” measures identified in the Paso Robles Climate Action Plan. To the extent possible, “voluntary” measures identified in the City’s Climate Action Plan should also be incorporated. Consistent with the City’s Climate Action Plan, GHG reduction measures shall include, but would not be limited to:</td>
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<td>incorporate Greenhouse Gas Emission Reduction Measures as policies into the Final Specific Plan. Developers of projects in the Plan Area shall incorporate applicable measures into project plans and submit documentation to the city that measures have been implemented or provide proof to the city that equivalent reductions have been achieved through other city-approved emissions reduction practices.</td>
<td>provide a statement to the city that verifies that Greenhouse Gas Reduction Measures have been incorporated into the Specific Plan and that applicable improvements are included in developments in the Plan Area once prior to issuance of building permits and again prior to issuance of occupancy permits. The city shall verify that transportation network improvements have been installed prior to the issuance of occupancy permits.</td>
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<tr>
<td>a. All tract improvement plans, public improvement plans and on-site improvement plans shall utilize LED high-efficiency lights for parking lots, streets, trails, and other public areas. (Climate Action Plan Measure E-5)</td>
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<tr>
<td>b. Building permit plans for all commercial buildings shall include only LED high-efficiency lights in parking areas and other exterior spaces. (Climate Action Plan Measure E-5)</td>
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<tr>
<td>c. Building permit plans for all commercial and multi-family development shall include on-site bicycle parking beyond that required by the California Green Building Standards Code (e.g., lockers or a locked room with standard racks and access limited to bicyclists only). (Climate Action Plan Measure TL-1)</td>
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<tr>
<td>d. All tentative subdivision maps and improvement plans within the Plan Area shall provide direct pedestrian and bicycle access from all cul-de-sacs and dead end streets that serve five or more properties to either a street or a dedicated multi-use path through the use of access easements, public dedications or similar means. Paths shall be improved or funded by the applicant before final subdivision maps may be recorded. (Climate Action Plan Measure TL-2)</td>
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<td>e. The Specific Plan transportation network shall be designed to minimize barriers to pedestrian access and interconnectivity. (Climate Action Plan Measure TL-2)</td>
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<td>f. The Specific Plan transportation network shall incorporate traffic calming improvements as appropriate (e.g., marked crosswalks, count-down signal timers, curb extensions, speed</td>
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<tr>
<td>tables, raised crosswalks, median islands, minicircles, tight corner radii, etc.). (Climate Action Plan Measure TL-2)</td>
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<td>g. Prior to the approval of any/all tentative subdivision maps, the applicant shall consult with the SLORTA or successor agency to determine needed alterations to local bus routes. Before the recordation of the related final subdivision map(s), the applicant shall construct or fund infrastructure needed to provide safe and convenient access to public transit within and contiguous to the Plan Area (Climate Action Plan Measure TL-3).</td>
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<tr>
<td>h. Any tentative subdivision map that results in the permanent closure of a road to automobile traffic shall include a pedestrian and bicycle connection through the road closure. Before the recordation of the related final subdivision map, the connection shall be improved or funded by the applicant. (Climate Action Plan Measure TL-3)</td>
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<tr>
<td>i. The Specific Plan shall be designed accommodate future public transit bus stop pull outs as recommended by the SLORTA. (Climate Action Plan Measure TL-3)</td>
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<td>j. Plan Area development shall comply with CALGreen Tier 1 or Tier 2 standards for water efficiency and conservation. (Climate Action Plan Measure W-1)</td>
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<td>k. Subdivision improvement plans shall include infrastructure to accommodate recycled water when it becomes available. (Climate Action Plan Measure W-1).</td>
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<td>l. The Plan Areas shall utilize recycled water to the maximum extent feasible when recycled water becomes available. (Climate Action Plan Measure W-1).</td>
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<td>m. Construction activity in the Plan Area shall divert a minimum of 65% of nonhazardous construction or demolition debris. (Climate Action Plan Measure S-1)</td>
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<td>n. Street trees shall be planted on all public and private streets to provide significant street shading at maturity. Street trees shall</td>
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<td>be planted at a spacing equal to the expected width of the tree at maturity (i.e., if a tree species grows to 30 feet in width, it shall be planted at an average spacing of 30 feet on center). (Climate Action Plan Measure T-1)</td>
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<tr>
<td>o. The City shall encourage the use of electrically powered appliances (e.g., water heaters, clothes dryers, cooking appliances, pool heating systems). Where gas appliances are installed, electrical services shall be provided to accommodate future retrofit to electrical appliances.</td>
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<tr>
<td><strong>HAZ-4 Soil Sampling and Remediation</strong></td>
<td>Project</td>
<td>CDD</td>
<td>As applicable, the city shall ensure implementation of a remediation program according to the measures included therein and as approved by a regulatory oversight agency.</td>
<td>Prior to issuance of any grading permits or site disturbance/tract improvements, a contaminated soil assessment shall be completed in the portions of land to be graded for development. The Contaminated Soils Assessment and Remediation Plan, if necessary, shall be submitted and approved by the city and applicable regulatory oversight agency prior to the issuance of project grading permits or site disturbance/tract improvements, whichever comes first.</td>
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Prior to issuance of any grading permits or site disturbance/tract improvements, a contaminated soil assessment shall be completed in the portions of land to be graded for development. Soil samples shall be collected under the supervision of a professional geologist or environmental professional to determine the presence or absence of contaminated soil in these areas. The sampling density shall be in accordance with guidance from the County of San Luis Obispo Environmental Health Services Division, so as to define the volume of soil that may require remediation. Laboratory analysis of soil samples shall be analyzed for the presence of organochlorine pesticides, in accordance with EPA Test Method SW8081A, and heavy metals in accordance with EPA Test Methods 6010B and 7471A. If soil sampling indicates the presence of pesticides or heavy metals exceeding applicable environmental screening levels, the soil assessment shall identify the volume of contaminated soil to be excavated. If concentrations of contaminants exceed EPA action levels and therefore warrant remediation, the applicant shall prepare a Contaminated Soils Assessment and Remediation Plan. The plan shall identify the contaminant, the volume of contaminated soil, treatment or remediation methods, and regulatory permits required to complete the remediation. Remediation activities shall require implementation of all applicable project construction requirements, including other.
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<tr>
<td>Construction-related mitigation measures identified in this EIR. All necessary reports, regulations and permits shall be followed to achieve cleanup of the site. The contaminated materials shall be remediated under the supervision of an environmental consultant licensed to oversee such remediation and under the direction of the lead oversight agency. The remediation program shall also be approved by a regulatory oversight agency, such as the County of San Luis Obispo Environmental Health Services Division, the RWQCB, or DTSC. All proper waste handling and disposal procedures shall be followed. Upon completion of the remediation, the environmental consultant shall prepare a report summarizing the project, the remediation approach implemented, and the analytical results after completion of the remediation, including all waste disposal or treatment manifests.</td>
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<tr>
<td><strong>N-2 Acoustical Assessments for Stationary Noise Sources</strong></td>
<td>Project</td>
<td>CDD</td>
<td>The city shall confirm that construction noise reduction measures are incorporated in plans prior to approval of grading/building permit issuance.</td>
<td>At time of Permitting, the Applicants shall submit required Acoustical Assessment to the city. Identified noise reduction measures shall be incorporated into project site plans prior to the issuance of grading and building permits.</td>
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<tr>
<td>The BSP shall include a policy or development standard that requires applicants for new development in the BSP planning area to provide an acoustical assessment prepared by a qualified professional where new commercial land uses are within 825 feet of existing noise-sensitive land uses. The acoustical assessments shall evaluate potential noise impacts attributable to the proposed Project, as well as, the compatibility of proposed land uses in comparison to applicable City noise standards for stationary noise sources. Where the acoustical analysis determines that stationary-source noise levels would exceed applicable City noise standards, noise-reduction measures shall be incorporated sufficient to reduce operational noise levels to below applicable noise standards. Such measure may include, but are not limited to, the incorporation of setbacks, sound barriers, berms, hourly limitations, or equipment enclosures.</td>
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<tr>
<td><strong>N-3 Construction Equipment Noise Best Management Practices</strong></td>
<td>Project</td>
<td>CDD</td>
<td>Construction plans shall note construction hours, truck routes, and construction Best</td>
<td>Prior to approval of grading/building permit issuance the city shall confirm that construction noise reduction measures are incorporated in plans.</td>
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<td>For all construction activities in the BSP planning area, noise attenuation techniques shall be employed to ensure that noise levels are minimized.</td>
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<td>Such techniques shall include:</td>
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<td>a. Unless otherwise provided for in a validly issued permit or approval, noise-generating construction activities shall be limited to the hours of 7:00 AM and 7:00 PM. Noise-generating construction activities shall not occur on Sundays or federal holidays.</td>
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<td>Management Practices (BMPs) and shall be submitted to the city for approval prior to grading and building permit issuance for each project phase. BMPs shall be identified and described for submittal to the city for review prior to building or grading permit issuance. BMPs shall be adhered to for the duration of the project. The schedule and neighboring property owner notification mailing list shall be submitted 10 days prior to initiation of any earth movement.</td>
<td>The city shall ensure compliance throughout all construction phases. Building inspectors and permit compliance staff shall periodically inspect the site for compliance with activity schedules and respond to complaints.</td>
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<td>b. Construction equipment shall be properly maintained and equipped with noise reduction intake and exhaust mufflers and engine shrouds, in accordance with manufacturers’ recommendations. Equipment-engine shrouds shall be closed during equipment operation.</td>
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<td>c. Equipment shall be turned off when not in use for an excess of five minutes, except for equipment that requires idling to maintain performance.</td>
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<td>d. A public liaison shall be appointed for project construction and shall be responsible for addressing public concerns about construction activities, including excessive noise. The liaison shall work directly with the construction contractor to ensure implementation of the appropriate noise reduction measures to address public concerns. Signage shall be posted at the site perimeter identifying the public liaison’s contact information.</td>
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<td>e. Virginia Peterson Elementary School shall be provided written notification a minimum of two weeks prior to beginning construction when construction activities are anticipated to occur within 400 feet of the school. The notification shall identify of the anticipated location, dates and hours of construction; as well as, the contact information for the public liaison.</td>
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<td>f. Where necessary, temporary noise barriers shall be installed.</td>
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<td>g. Staging and queuing areas shall be located at the furthest distance possible from nearby noise-sensitive land use identified in the project area at the time of construction.</td>
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<td><strong>TR-1 Traffic Control Plan</strong>&lt;br&gt;The project applicant shall prepare a Traffic Control Plan for review and approval by the City Emergency Services Department and City Engineer. The Traffic Control Plan shall include provisions to prohibit construction traffic during the AM and PM peak hours on Niblick Road.</td>
<td>Project</td>
<td>CDD</td>
<td>Shown on Plans</td>
<td>The applicant shall submit the Traffic Control Plan to the City, and the City shall approve the Traffic Control Plan prior to initial ground-disturbing or other construction activities.</td>
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<tr>
<td><strong>TR-2 Fair Share Funding for Caltrans Intersection (#3) Improvements</strong>&lt;br&gt;Prior to building permit final for each unit, the applicant shall contribute their fair-share amount through the City’s Transportation Impact Fee (TIF) program, for the ultimate improvements on SR 46E, consistent with the RTP, which consist of restricting left turns on SR 46E at Union Road.</td>
<td>Project</td>
<td>CDD</td>
<td>Per unit basis.</td>
<td>The fair-share contribution for required improvements shall be submitted on a per-unit basis prior to occupancy for each unit.</td>
</tr>
<tr>
<td><strong>TR-3(a) Fair Share Funding for Intersection (#6) Improvements</strong>&lt;br&gt;The project shall contribute its equitable share to fund the following transportation improvements:&lt;br&gt;<strong>a.</strong> Golden Hill Road/Union Road (Intersection #6): Prior to building permit final for each unit, the applicant shall contribute their fair-share amount through the City’s TIF program for the installation of a single-lane roundabout at Golden Hill Road/Union Road.</td>
<td>Project</td>
<td>CDD</td>
<td>Per unit basis.</td>
<td>The City shall ensure compliance with transportation impact fee payment prior to occupancy for each unit.</td>
</tr>
<tr>
<td><strong>TR-3(b) Implementation of Improvements for Intersections (#12, #13, #18, #20)</strong>&lt;br&gt;The project shall construct the following improvements to mitigate impacts to these intersections:&lt;br&gt;<strong>a.</strong> Creston Road/Stoney Creek Road (Intersection #12): The applicant shall install a traffic signal at Creston Road/Stoney Creek Road. The applicant shall conduct an intersection operations analysis prior to the issuance of the 554th building permit and install the signal if warranted at that time. If not warranted at the 554th building permit, the operations analysis</td>
<td>Project</td>
<td>CDD</td>
<td>The City shall ensure completion of improvements prior to issuance of building permits for the specified unit.</td>
<td>The applicant is required to construct improvements to Creston Road/Stoney Creek Road (Intersection #12) prior to the issuance of building permit for the 554th unit unless the intersection operations analysis identifies a later unit count. Improvements shall be installed no later than issuance of the building permit for the 674th unit. The applicant is required to construct improvements to Creston Road/Meadowlark Road (Intersection #13) prior to the issuance of building permit for</td>
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<td>shall determine at what unit count prior to the 674th unit the signal is warranted. The signal shall be installed prior to the issuance of the 674th building permit. If the signal is installed by the Olsen-South Chandler Ranch Specific Plan, then the applicant shall pay its fair share of the signal installation.</td>
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<td>the 554th unit unless the intersection operations analysis identifies a later unit count. Improvements shall be installed no later than issuance of the building permit for the 911th unit. The applicant is required to construct improvements to South River Road/Charolais Road (Intersection #20) prior to the issuance of building permit for the 250th unit unless the intersection operations analysis identifies a later unit count. Improvements shall be installed no later than issuance of the building permit for the 554th unit.</td>
</tr>
<tr>
<td>b. Creston Road/Meadowlark Road (Intersection #13): The applicant shall install a traffic signal at Creston Road/Meadowlark Road. The applicant shall conduct an intersection operations analysis prior to the issuance of the 554th building permit and install the signal if warranted at that time. If not warranted at the 554th building permit, the operations analysis shall determine at what unit count prior to the 911th unit the signal is warranted. The signal and associated improvements shall be installed prior to the issuance of the 911th building permit. If the signal is installed by the Olsen-South Chandler Ranch Specific Plan, then the applicant shall pay its fair share of the signal installation.</td>
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<tr>
<td>c. South River Road/Charolais Road (Intersection #20): The applicant shall construct a single-lane roundabout at South River Road/Charolais Road. The applicant shall conduct an intersection operations analysis prior to the issuance of the 250th building permit and install the signal if warranted at that time. If not warranted at the 250th building permit, the operations analysis shall determine at what unit count prior to the 554th unit the signal is warranted. The single-lane roundabout shall be installed prior to the issuance of the 554th building permit.</td>
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<tr>
<td>d. South River Road/Riverbank Lane (#18): The applicant shall install two-way left turn lane striping, between Riverbank Lane and Serenade Lane, at South River Road and Riverbank Lane. The improvement shall be installed with the South River Road/Charolais Road (Intersection #20) improvements.</td>
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</table>
## Beechwood – Specific Plan Mitigation Monitoring and Reporting Program

<table>
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<tr>
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<tbody>
<tr>
<td>TR-4(a) Implementation of Improvements at 13th Street/Riverside Avenue (#7)</td>
<td>Project</td>
<td>CDD</td>
<td>The City shall ensure compliance prior to issuance of the building permit for the first unit.</td>
<td>The required improvements shall be constructed prior to issuance of the first building permit. If the Olsen-South Chandler Ranch Specific Plan constructs these improvements, the applicant shall contribute their fair-share amount for these improvements based on their proportional share of the improvements under Existing Conditions Plus Project.</td>
</tr>
<tr>
<td>TR-4(b) Implementation of Improvements at 13th Street/Paso Robles Street (#8)</td>
<td>Project</td>
<td>CDD</td>
<td>The City shall ensure compliance prior to issuance of the building permit for the first unit.</td>
<td>The required improvements shall be constructed prior to issuance of the first building permit. If the Olsen-South Chandler Ranch Specific Plan constructs these improvements, the applicant shall contribute their fair-share amount for these improvements based on their proportional share of the improvements under Existing Conditions Plus Project.</td>
</tr>
<tr>
<td>TR-6 Implementation of Improvements at Niblick Road/South River Road (#17)</td>
<td>Project</td>
<td>CDD</td>
<td>Prior to occupancy of the first building unit.</td>
<td>The required improvements shall be constructed prior to occupancy of the first unit. If required to implement right-turn overlap phases, this improvement shall be constructed prior to occupancy of the first unit. If the Olsen-South Chandler Ranch Specific Plan constructs these improvements, the applicant shall contribute their fair-share amount for these improvements based on their proportional share of the improvements under Existing Conditions Plus Project.</td>
</tr>
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## Beechwood – Specific Plan Mitigation Monitoring and Reporting Program

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<tbody>
<tr>
<td><strong>TR-8 Fair Share Funding for Intersection (#4) Improvements</strong></td>
<td>Project</td>
<td>CDD</td>
<td>The City shall ensure compliance with TIF payment prior to final of each building permit.</td>
<td>The fair-share contribution for required improvements shall be submitted on a per-unit basis prior to building permit final for each unit.</td>
</tr>
<tr>
<td>The applicant shall make a fair-share contribution through the City’s TIF program for ultimate improvements on SR 46E, consistent with the RTP, which consists of restricting left turns on SR 46E at Union Road and Airport Road. Implement Mitigation Measure TR-2 Fair Share Funding for Caltrans Intersection (#3) Improvements.</td>
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<tr>
<td><strong>TR-10 Implementation of Improvements at Creston Road/Charolais Road (#14)</strong></td>
<td>Project</td>
<td>CDD</td>
<td>The required improvements shall be constructed prior to issuance of the 911th building permit. If the Olsen-South Chandler Ranch Specific Plan constructs these improvements prior to the 911th Beechwood unit, the applicant shall contribute their fair-share amount for these improvements prior to issuance of the building permit for the 911th unit.</td>
<td>The City shall ensure compliance prior to issuance of the 911th building permit.</td>
</tr>
<tr>
<td>The applicant shall evaluate and install an all-way stop control at Creston Road/Charolais Road. Implement Mitigation Measure TR-3(b) Implementation of Improvements for Intersections (#12, #13, #18, #20).</td>
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<tr>
<td><strong>TR-11 Fair Share Funding for Intersection (#11) Improvements</strong></td>
<td>Project</td>
<td>CDD</td>
<td>The fair-share contribution for required improvements shall be submitted on a per-unit basis prior to building permit final for each unit.</td>
<td>The City shall ensure compliance with TIF payment prior to final of each building permit.</td>
</tr>
<tr>
<td>The project shall contribute its equitable share to fund the following transportation improvements. Costs above and beyond the project’s equitable share shall be addressed through such options as fee credits, reimbursement agreements, or development agreements, based on city</td>
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## Beechwood – Specific Plan Mitigation Monitoring and Reporting Program

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<tr>
<td>requirements.</td>
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<tr>
<td>a. Creston Road/Niblick Road (#11): Prior to building permit final for each unit,</td>
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<td></td>
<td>If the applicant is required to construct improvements at Creston Road/Niblick Road (#11), the improvements shall be completed prior to the building permit final of the 500th Beechwood unit, the applicant shall construct these improvements.</td>
<td>final of the 500th unit.</td>
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<tr>
<td>the applicant shall contribute their fair-share amount through the City’s TIF</td>
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<td>program for the installation of a second southbound left-turn, southbound right-</td>
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<tr>
<td>turn, and eastbound right-turn lanes. If the Olsen-South Chandler Ranch Specific</td>
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<td>Plan has not started construction of the improvements prior to the building</td>
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<tr>
<td>permit final of the 500th Beechwood unit, the applicant shall construct these</td>
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<td>improvements.</td>
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<tr>
<td>TR-13 Fair Share Funding for Intersection (#16) Improvements</td>
<td>Project</td>
<td>CDD</td>
<td>The fair-share contribution for required improvements shall be submitted on a per-unit basis prior to building permit final for each unit.</td>
<td>The City shall ensure compliance with TIF payment prior to final of each building permit.</td>
</tr>
<tr>
<td>The project shall contribute its equitable share to fund the following transportation improvements. Costs above and beyond the project’s equitable share shall be addressed through such options as fee credits, reimbursement agreements, or development agreements, based on city requirements.</td>
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</tr>
<tr>
<td>a. 1st Street-Niblick Road/Spring Street (#16): Prior to building permit final for each unit, the applicant shall contribute their fair-share amount through the City’s TIF program for the installation of an eastbound right turn lane at this intersection.</td>
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<tr>
<td>Implement Mitigation Measure TR-6 Implementation of Improvements at Niblick Road/</td>
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<tr>
<td>South River Road (#17).</td>
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</tr>
<tr>
<td>TR-16(a) Fair Share Funding for Caltrans Intersection (#2) Improvements</td>
<td>Project</td>
<td>CDD</td>
<td>The fair-share contribution for required improvements shall be submitted on a per-unit basis prior to building permit final for each unit.</td>
<td>The City shall ensure compliance with TIF payment prior to final of each building permit.</td>
</tr>
<tr>
<td>The applicant shall make a fair-share contribution through the City’s TIF program for ultimate improvements on SR 46E, consistent with the RTP, which consists of restricting access at the intersection to right-in, right-out.</td>
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</tr>
<tr>
<td>TR-16(b) Fair Share Funding for Riverside Avenue/Pine Street/US 101 Southbound</td>
<td>Project</td>
<td>CDD</td>
<td>The fair-share contribution for required improvements shall be submitted on a per-unit basis prior to building permit final for each unit.</td>
<td>The City shall ensure compliance with TIF payment prior to final of each building permit.</td>
</tr>
<tr>
<td>Ramps (#15) Improvements</td>
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<tbody>
<tr>
<td>The applicant shall make a fair-share contribution through the City’s TIF program for installation of an all-way stop control at Riverside Avenue/Pine Street at the US 101 southbound ramps.</td>
<td></td>
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<td>basis prior to building permit final for each unit.</td>
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</tr>
<tr>
<td><strong>TR-20 Implementation of Improvements at North River Road/Creston Road (#9)</strong></td>
<td>Project</td>
<td>CDD</td>
<td>The required improvements shall be constructed prior to the issuance of the building permit for the first unit. This improvement shall be done in conjunction with TR-4(a), TR-4(b), and TR-4(c). Improvements at this intersection are not eligible for TIF Program credits. Implement Mitigation Measure TR-4(a) and TR-4(b).</td>
<td>The City shall ensure compliance prior to the issuance of the building permit for the first unit.</td>
</tr>
<tr>
<td>To mitigate impacts, Class II bike lanes shall be installed on Meadowlark Road from Beechwood Drive to Creston Road</td>
<td></td>
<td></td>
<td>The requirements include:</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Project</td>
<td>CDD</td>
<td>The City shall ensure compliance with improvement installation prior to final of building permit for the first unit.</td>
<td>The improvements to Meadowlark Road west of Beechwood Drive shall be installed prior to final of building permit for the first unit of the development. Improvements to Meadowlark Road east of Beechwood Drive shall be installed prior to final of building permits for the first unit for each subarea in Phase 1.</td>
</tr>
</tbody>
</table>