



Panorama Drive Subdivision Project

Initial Study

prepared by

City of Morro Bay

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Morro Bay, California 93442

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prepared with the assistance of

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Initial Study

1 Project Title

Panorama Drive Subdivision Project

2 Lead Agency Name and Address

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Morro Bay, California 93442
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3 Contact Person and Contact Information

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4 Project Sponsor's Name and Address

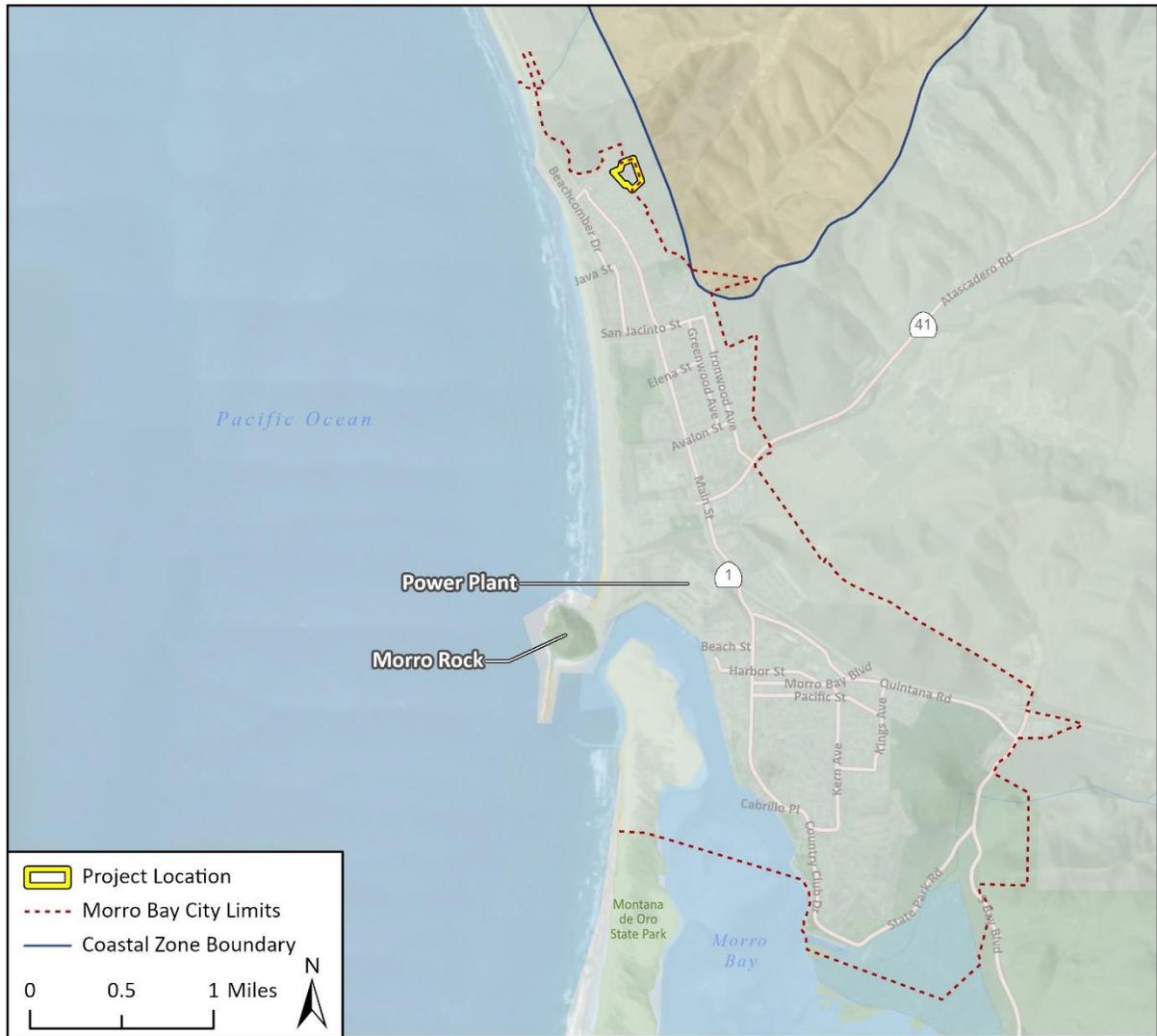
Morro 94, LLC
2141 Tuolumne Street, Suite J
Fresno, California 93721

5 Project Location

The 10.1-acre project site is located at 3300 Panorama Drive in the northeast corner of the City of Morro Bay, San Luis Obispo County, California. The site is identified as Assessor's Parcel Number 065-038-001. The project site is surrounded by single-family residential development to the northwest, west, and southwest. The City limits of Morro Bay follow the project site's eastern boundary, and the project site is surrounded by undeveloped open space to the northeast, east, and southeast. The project site is approximately 2,000 feet east of the Pacific Ocean and is within the Coastal Zone as established by the California Coastal Commission.

Figure 1 shows the regional location of the project site, and Figure 2 shows the location of the project site in its neighborhood context.

Figure 1 Regional Project Location

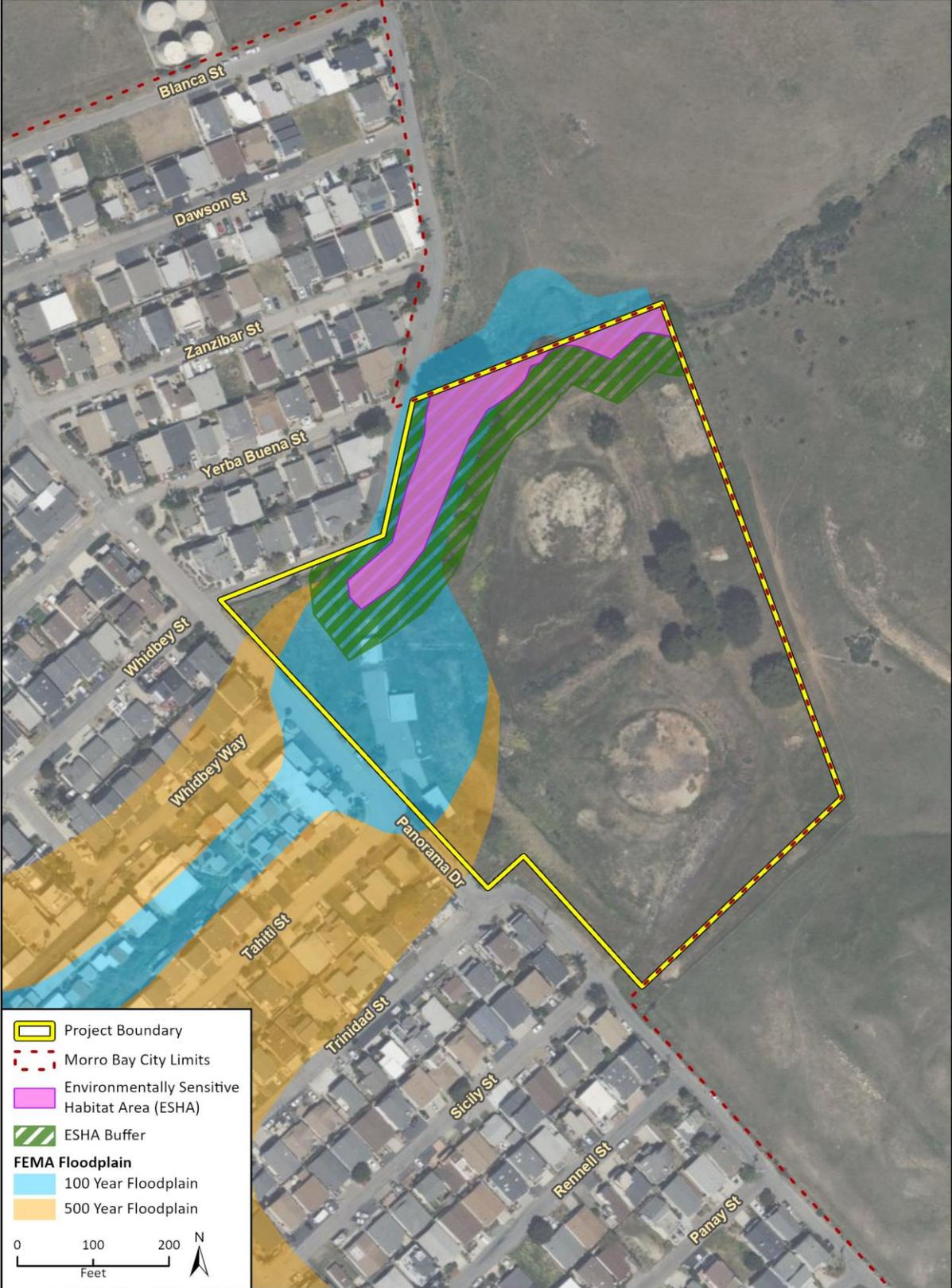


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22-12889 Panorama EP5
Fig 1 Regional Location



Figure 2 Project Location



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Additional data provided by U.S. Geological Survey National Hydrography Dataset, 2023; FEMA, 2023.

22-12889 Panorama EFS
Fig 2 Project Location_ESHA

6 General Plan Designation

The project site is designated in the Morro Bay General Plan/Local Coastal Plan (“Plan Morro Bay”) as Moderate-Density Residential.

7 Zoning

The project site is zoned by the City of Morro Bay as Residential Single-Unit (RS-A) with a permitted density of 4.1 units per acre to 7.0 units per acre. Pursuant to Section 17.18 of the Zoning Ordinance, the project is proposing to apply a Planned Development (PD) Overlay District to the property. The PD Overlay District is intended to allow the modification of or exemption from the development standards of the primary zone if such action would result in better design or other public benefit. Three requirements that are being proposed to allow flexibility are:

1. Building Height Calculations,
2. Front Elevation Second Story Stepback, and
3. Building Massing.

These deviations from the Residential Single-Unit (RS-A) Zoning Ordinance standards are discussed in detail in Section 14.XI, *Land Use and Planning*. The project site includes mapped Environmentally Sensitive Habitat Area (ESHA)¹ along the northern/western portion of the project boundary along the natural path of historic storm water drainage.

8 Project Background and Setting

Currently, most of the project site is vacant with scattered trees. An existing office building, electrical transformer building, and garage/shed, as well as associated sidewalks, driveways, and concrete are located on the southwestern 0.3 acre of the project site (3 percent of the 10.1-acre project site).

The project site contains a designated ESHA and partially overlaps with the California Coastal Commission’s Appeals Jurisdiction² along the existing drainage channel that runs north/south through the western portion of the site. The existing drainage channel contributes to 100-year and 500-year Federal Emergency Management Agency (FEMA) designated floodplains, from which the limits of surveyed ESHA and ESHA buffer are delineated. The topography of the site varies, with level portions of the site giving way to steep slopes up to 10-20 percent, and an elevation of 136 feet to 80 feet above sea level, generally sloping from east to west.

The project site was previously used by the Department of the Navy as a jet fuel storage and distribution facility. In early 2018, the City initiated an Initial Study-Mitigated Negative Declaration

¹ Section 30107.5 of the Coastal Act defines ESHA as areas in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem, and which could be easily disturbed, degraded, or enhanced by human activities and developments. The Coastal Act states that resource extraction, development, and sales or transfers should be limited or prohibited in ESHA in order to ensure that these areas remain intact (especially Sections 30240, 30233, 30263, and 30609.5). Plan Morro Bay maps ESHA in the City.

² The California Coastal Commission appeals jurisdiction includes areas within 100 feet of any wetland, estuary, or stream, among other conditions. Development in the coastal zone within the City of Morro Bay is typically regulated by the Local Coastal Program (LCP), which is certified by the California Coastal Commission. Because the City of Morro Bay has an LCP, the City typically issues coastal development permits within their jurisdiction. However, the California Coastal Commission can appeal projects within appeals jurisdiction although the City of Morro Bay maintains an LCP.

(IS-MND) pursuant to the California Environmental Quality Act (CEQA) for the demolition and removal of tanks, piping, pump equipment, tank foundations, and shotcrete from the project site. In June 2018, the City Planning Commission recommended conditional approval for the demolition and removal activities by adopting Planning Commission Resolution 15-18 which included findings for Coastal Development Permit CP0-500, Conditional Use Permit UP0-440, and adoption of the MND with conditions and mitigation measures.

Following approval in June 2018, demolition and removal of the fuel tanks and related equipment was completed. The following structures and infrastructure remain onsite: a 25-foot by 30-foot electrical transformer building, 28-foot by 30-foot concrete office building, and a 25-foot by 40-foot garage/shed; driveways, steps, walkways, asphalt, and concrete in the pump area; water supply and storm drain lines; and a portion of the 6-inch diameter fuel pipeline located adjacent to the designated ESHA, which was abandoned in place.

9 Description of Project

The Panorama Drive Subdivision Project (hereinafter referred to as “proposed project” or “project”) would involve demolition of the remaining onsite structures and the subdivision of the 10.1-acre project site to create 46 residential lots and one common lot. Residential lots would range in size from approximately 2,800 square feet to 6,690 square feet and would be developed with a total of 46 for-sale single family residences, 16 of which would contain ‘casitas’ or separate living facilities interior to the structure. Onsite vehicular access would be provided by two newly created internal roadways that would provide access to residential lots throughout the site. There would be two ingress/egress connections from the private roads on the project site to the public street, Panorama Drive. Portions of the project site would also be used for drainage, infrastructure, and open space. Figure 3 shows the proposed Vesting Tentative Map. Figure 4 shows the proposed Conceptual Site Plan.

Demolition

The project would require demolition of the existing onsite office building, electrical transformer building, and garage/shed, as well as associated sidewalks, driveways, and concrete. Additionally, the project would include relocation/removal of existing auxiliary poles along the southern site boundary, drainage structures throughout (including a storm drain running diagonally northwest/southeast to the existing storm rain inlet along Panorama Drive), fence line along the northern and eastern site boundary, and interior site retaining walls. Demolition of these structures and infrastructure would occur over approximately four weeks. Demolition debris would be hauled to and disposed of at Cold Canyon Landfill, or another landfill specified by the construction contractor.

Site Preparation and Construction

Site preparation is anticipated to be completed in one phase and take approximately to 12 months with vertical construction of the residences to follow. Construction of the residences would depend on sales and market conditions but is anticipated to take approximately two years after the completion of site preparation. Pursuant to Morro Bay Municipal Code Section 9.28.030, construction activities would be limited to 7:00 a.m. to 7:00 p.m. on weekdays and 8:00 a.m. to 7:00 p.m. on weekends.

The project would involve earthwork on approximately 7.2 acres of the 10.1-acre site, east of designated ESHA and FEMA designated 100-year and 500-year floodplain area. Figure 5 shows the Preliminary Grading Plan. Grading would primarily occur in the central portion of the project site surrounding the proposed residential lots, as this area of the project site is steeply sloped and is higher in elevation than the project site's frontage with Panorama Drive. The retention berms surrounding the previous fuel facility pads and the project site's frontage would be graded so that slopes between proposed lots 1 through 15 and lots 16 through 20 would not exceed 2:1 (vertical to horizontal, or 50 percent). Additionally, heavy grading would occur at the southern terminus of the proposed Private Road B to reduce slopes between the end of the road and the common lot along the southeastern boundary of the site. Overall, steep slopes within the project site would be graded so that the project site slopes are 12 percent at the steepest portion within the project, sloping upward from the project site's frontage with Panorama Drive.

Grading would require cut of approximately 13,800 cubic yards of soil and 57,125 cubic yards of fill soil. Based on an assumed soil shrinkage of 20 percent, an adjusted fill of 59,885 cubic yards of soil would be required. Therefore, approximately 46,085 cubic yards of soil would be imported for backfill on the site.

Residential Development

Individual residential lots would be developed with two-story single-family residences. Floor plans would vary between each lot, but each residence would have a two-car garage and a ground floor patio or upper floor balcony. Lots 1-8 and lots 31-46 would have driveways that could accommodate two cars. An additional 38 marked and 32 unmarked parking spaces would be evenly distributed throughout the site. There would be 17 public parking spaces proposed on Panorama Drive. Residences would be no more than 25 feet in height, measured from proposed grade. Site setbacks would vary depending on the lot, but in general, would include a 15-20' front yard setback, a rear yard setback of 5' to 10', an interior side yard setback of 5', and an exterior side yard setback of 10'.

Roadways and Sidewalks

The project site would be accessible via two private roadways. Private Road F would connect the project site to Panorama Drive across from its intersection with Tahiti Street, and would continue north, connecting to Private Road D. Private Road E would run north/south along the eastern portion of the site, between the residences and open space, and also connect to Panorama Drive near its intersection with Trinidad Street. Private Roads A, B, and D, would run east/west internally in the project site, connecting to Private Road C, which runs north/south along the western portion of the site. Total paved surfaces (excluding sidewalks) would occupy approximately 69,355 square feet (approximately 1.6 acres) of the project site.

Sidewalks would be constructed on the project site frontage along Panorama Drive, and along one side of each new private roadway. Private Road A would have a sidewalk on the southern side. Private Road B includes a sidewalk on the northern side. Private Road C would include sidewalk along the eastern side, Private Road D would include sidewalk along the northern side, and Private Road E would include sidewalk along the western side. Sidewalk and crossings join the pedestrian trail network at key locations connecting the neighborhood and the open space.

The project includes three internal paved pedestrian trails, east of the ESHA along Private road C and in the open space, south of the ESHA between the retention basin, and inside the Lot 47, containing open space.

Open Space and Landscaping

Approximately 2.4 acres of the project site would consist of landscaping. Open space and landscaped areas would be located primarily along the northwestern boundary of the project site near the existing drainage channel and the southeastern portion of the project site. The drainage channel and sensitive habitat areas would be separated from the residential lots by Private Road C and an open space area with landscaping and pedestrian trails.

Figure 3 Vesting Tentative Map



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22-12889-EP5
Fig X Project Site Plan

Figure 4 Conceptual Site Plan



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Project Site data provided by RRM Design Group, 2024.

22-12889-EP5
Fig X Project Site Plan

Figure 5 Preliminary Grading Plan



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Project Site data provided by RRM Design Group, 2024.

The landscaped area in the eastern portion of the project site would include public amenities along the proposed pedestrian trails, including picnic tables, a bench, and a fitness station. A natural play area would be located north of Lot 15 and east of Lot 16, and an additional flexible use/turf area with tables would be located between Lots 9-11 and Lots 18-20. Open space and pedestrian trails would be located in the northwestern portion of the project site along a 50-foot buffer from the existing drainage channel on site.

There are 83 existing trees on the site. The project would remove 35 of the existing trees (30 native Monterey cypress and five non-native Hollywood juniper), retain 48 of the existing trees, and plant 51 new trees. Trees to be removed are located outside of designated ESHA.

Stormwater Drainage/Utility Improvements

The project would add 173,983 square feet of impervious surfaces (approximately four acres), and would include construction of five retaining walls between 8-12 feet in height. Retaining walls would be generally located behind residences once construction is complete.

Stormwater within the project site would be directed towards a dry well bioretention basin located in the southwestern portion of the site designed to contain treatment and provide infiltration. Collected stormwater would percolate down to a 4-inch polyvinyl chloride (PVC) pipe, which would drain water toward the existing drainage channel on the northwestern boundary of the project site, accommodating a 95th percentile storm, consistent with City standards for retention.

The project would require connections to existing water, wastewater, electricity, and natural gas infrastructure. Project development would tie into existing water and sewer mains and natural gas and electric infrastructure within Panorama Drive that currently serve surrounding residential development.

10 Public Agencies Whose Approval is Required

The City of Morro Bay is the lead agency for this project. The project requires the following discretionary approvals from the City:

- Coastal Development Permit
- Planned Development Overlay District
- Local Coastal Program Amendment (due to Planned Development Overlay District)
- Vesting Tentative and Final Tract Map
- Building Permits

Other public agencies who may serve as responsible agencies or may have approval authority over the project include:

- California Coastal Commission (Local Coastal Program Amendment)
- California Department of Fish and Wildlife
- U.S. Fish and Wildlife Service
- U.S. Army Corps of Engineers
- Central Coast Regional Water Quality Control Board

11 Have California Native American Tribes Traditionally and Culturally Affiliated with the Project Area Requested Consultation Pursuant to Public Resources Code Section 21080.3.1?

On December 8, 2022, the City of Morro Bay sent letters to representatives of tribes who have requested Assembly Bill 52 consultation. Additional detail regarding responses and recommendations of tribal representatives is included in Section 14.XVIII, *Tribal Cultural Resources*.

12 Environmental Factors Potentially Affected

This project would potentially affect the environmental factors checked below, involving at least one impact that is “Potentially Significant” or “Less than Significant with Mitigation Incorporated” as indicated by the checklist on the following pages.

- | | | |
|--|---|--|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Air Quality |
| <input checked="" type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources | <input type="checkbox"/> Energy |
| <input checked="" type="checkbox"/> Geology and Soils | <input type="checkbox"/> Greenhouse Gas Emissions | <input checked="" type="checkbox"/> Hazards and Hazardous Materials |
| <input type="checkbox"/> Hydrology and Water Quality | <input type="checkbox"/> Land Use and Planning | <input type="checkbox"/> Mineral Resources |
| <input type="checkbox"/> Noise | <input type="checkbox"/> Population and Housing | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Recreation | <input type="checkbox"/> Transportation | <input checked="" type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Utilities and Service Systems | <input type="checkbox"/> Wildfire | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

13 Determination

Based on this initial evaluation:

- I find that the proposed project **COULD NOT** have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions to the project have been made by or agreed to by the project proponent. A **MITIGATED NEGATIVE DECLARATION** will be prepared.
- I find that the proposed project **MAY** have a significant effect on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required.
- I find that the proposed project **MAY** have a “potentially significant impact” or “less than significant with mitigation incorporated” impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An **ENVIRONMENTAL IMPACT REPORT** is required, but it must analyze only the effects that remain to be addressed.

- I find that although the proposed project could have a significant effect on the environment, because all potential significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature

Date

Printed Name

Title

14 Environmental Checklist

14.1 Aesthetics

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--	--------------------------------	--	------------------------------	-----------

Except as provided in Public Resources Code Section 21099, would the project:

a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Environmental Setting

The project site was previously used as a jet fuel storage and distribution facility. In 2018, demolition and removal of the fuel tanks and related equipment was completed. Currently, most of the project site is vacant with scattered trees, including a mixture of non-native annual grasses and weeds. The following structures and infrastructure remain onsite: a 25-foot by 30-foot electrical transformer building, 28-foot by 30-foot concrete office building, and a 25-foot by 40-foot garage/shed; driveways, steps, walkways, asphalt, and concrete in the pump area; water supply and storm drain lines; and a portion of the 6-inch diameter fuel pipeline located adjacent to the designated ESHA, which was abandoned in place. The project site is in an urbanized area and is zoned as Moderate Density Residential (RS-A).

Plan Morro Bay contains policies that protect the City’s visual resources. The waterfront and Embarcadero are designated as scenic view areas in the City’s Visual Resources and Scenic Highway

Element. Morro Rock, the sand spit, the harbor, and navigable waterways are all considered significant scenic resources. State Route 1 (SR 1), which is located approximately 0.2 mile west of the project site, is a Caltrans-designated Scenic Highway and All-American Road. Scenic vistas visible from SR 1 include the Pacific Ocean, Morro Rock, and the hillsides and ridgelines to the east of the City.

Impact Analysis

a. Would the project have a substantial adverse effect on a scenic vista?

While there are no officially designated scenic vistas in Morro Bay, several places within the city provide views of visual resources in Morro Bay including Morro Rock, the former Morro Bay Power Plant, downtown Morro Bay, and various coastal views of the beach, harbor, and salt marsh. According to the viewpoints map (Figure C-7) in Plan Morro Bay, the project site is not a scenic vista and does not function as part of a scenic view from any designated viewpoints or vistas in the City (City of Morro Bay 2021a).

Long range views of the Pacific Ocean are intermittently available from Panorama Drive, with visibility increasing as the elevation of the project site increases to the east. Long range views of the former Morro Bay Power Plant and Morro Rock are also available at the upper elevations of the project site along the eastern boundary. Because the project would be located along the City limits and no development is located east of the project site, the project would not obstruct views of identified scenic elements, such as Morro Rock, the Pacific Ocean, or the Morro Bay Power Plant, which are all located west of the site. The project would not have a substantial adverse effect on a scenic vista and this impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

b. Would the project substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

SR 1 is an officially designated State Scenic Highway located 0.2 mile south of the project site (California Department of Transportation [Caltrans] 2019). The eastern portion of the project site is intermittently but partially visible from SR 1 due to its elevation; however, most of the project site is not visible from SR 1 due to intervening residential development. The proposed residential development would be visually compatible with existing single-family residential neighborhoods to the north, west, and south of the project site.

The project would remove 35 of the existing 83 on-site trees (30 native Monterey cypress and five non-native Hollywood juniper). Several of the central clustered Monterey cypress trees are partially visible from SR 1. The project would retain 48 of the existing trees and plant 51 new trees. Trees to be removed are located outside of designated ESHA and are not designated scenic resources. There are no historic buildings located on the site (refer to Section 14.V, *Cultural Resources*, Checklist Item 5a). There are no rock outcroppings or other scenic resources on the project site. The project would not substantially damage scenic resources with the SR 1 State Scenic Highway viewshed and this impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

c. Would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings?

The project site does not provide publicly accessible viewpoints. The project site is located in a non-urbanized area adjacent to City limits and would introduce urbanized elements that would partially be visible from SR 1. Located on the hillside, the height and scale of the project would be terraced, reducing visual massing as the elevation increases. The proposed single-family residential project would be similar to surrounding existing single-family residences to the northwest and southwest. Therefore, the project would not substantially degrade the existing visual character or quality of public views of the site. This impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- d. *Would the project create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?*

The project site has minimal existing sources of light generation; a light pole located adjacent to the between the concrete office building and foot garage/shed and exterior lights at the entrances to the electrical transformer and office building. The project would include new lighting associated with the proposed new residential units, private roadways, and pedestrian trails, which would contribute to existing sources of light and glare in the surrounding residential area. However, the project would be required to comply with Morro Bay Municipal Code Title 17, Chapter 17.23.080, which outlines site design standards for lighting, illuminated signs, and glare in the city. This ordinance requires that lighting not be directed toward adjacent residential uses and streets, and that glare be screened from sensitive uses. Therefore, the project would not result in new sources of lighting or glare that would be inconsistent with adjacent uses and would not adversely affect day or nighttime views. This impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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14.11 Agriculture and Forestry Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)); timberland (as defined by Public Resources Code Section 4526); or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Environmental Setting

The California Department of Conservation (DOC) classifies the project site as Urban and Built-Up Land (DOC 2016a). The project site is not subject to a Williamson Act contract (DOC 2016b). The project site and surrounding parcels are zoned as Moderate Density Residential (RS-A) and are not zoned for farmland or agricultural uses.

Impact Analysis

- a. *Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?*

- b. *Would the project conflict with existing zoning for agricultural use or a Williamson Act contract?*
- c. *Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)); timberland (as defined by Public Resources Code Section 4526); or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?*
- d. *Would the project result in the loss of forest land or conversion of forest land to non-forest use?*
- e. *Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?*

The project site and surrounding parcels are zoned as Moderate Density Residential (RS-A) and are not zoned for farmland or agricultural uses. The DOC Farmland Mapping and Monitoring Program designates the site as Urban and Built-Up Land (DOC 2016a). Accordingly, the project would not be located on land designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) and would not convert Farmland to non-agricultural use. Furthermore, the project would not conflict with existing zoning for agricultural use or a Williamson Act contract.

The project site is within the City limits of Morro Bay, is immediately adjacent to a developed area, and does not contain timberland or forest land (California Department of Fish and Wildlife 2019). The project site is not zoned for timberland or forest uses. Accordingly, the project would not conflict with existing zoning for or cause rezoning of forestland or timberland, and would not result in the loss of forest land or conversion of forest land to non-forest use.

The project would not involve off-site changes and would not otherwise result in the conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use. There would be no impact to agriculture or forestry resources.

NO IMPACT

14.III Air Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Environmental Setting

The City of Morro Bay is located within the South Central Coast Air Basin (SCCAB) which includes all of San Luis Obispo, Santa Barbara, and Ventura counties. The regional climate is Mediterranean in character, with warm, dry summers and cooler, relatively damp winters. Along the coast, mild temperatures are the rule throughout the year due to the moderating influence of the Pacific Ocean. Maximum summer temperatures average about 70 degrees Fahrenheit near the coast, while inland valleys often exceed 90 degrees Fahrenheit. Minimum winter temperatures average from the low 30s along the coast to the low 20s inland.

Impact Analysis

a. *Would the project conflict with or obstruct implementation of the applicable air quality plan?*

The SCCAB is subject to the jurisdiction of the San Luis Obispo County Air Pollution Control District (SLOAPCD), which maintains the regional Clean Air Plan. According to SLOAPCD's *CEQA Air Quality Handbook* (2023), the consistency of residential projects with the Clean Air Plan is evaluated based upon if the project is consistent with the land use and transportation control measures and strategies within the Clean Air Plan (SLOAPCD 2023). In addition, the project's potential to result in growth is evaluated determine if it would exceed the San Luis Obispo Council of Governments' 2050 Regional Growth Forecast, which SLOAPCD utilizes within the Clean Air Plan to forecast projected emissions in the SCCAB.

The project would be consistent with Clean Air Plan measures related to improving access to alternative transportation and improving traffic flow (Clean Air Plan Measures T-3 and T-6) because, as described in Section 14.VIII, *Greenhouse Gas Emissions*, the proposed project would provide

bicycle parking, pedestrian linkages and interconnectivity, and traffic calming measures in accordance with Appendix C of the City’s Climate Action Plan (CAP). The project site is located within the City limits of Morro Bay and is therefore consistent with the Clean Air Plan’s land use strategies for planning compact communities (Clean Air Plan Measure L-1). A bus stop is located approximately 0.18-mile southwest of the project site; therefore, the project would provide access to transit in support of the Clean Air Plan’s circulation management policies (Clean Air Plan Measure L-4). Because the project would not conflict with applicable Clean Air Plan land use and transportation control measures and strategies, the proposed project would be considered consistent with the Clean Air Plan.

The current population of Morro Bay is 10,261 residents, and the City is forecasted to have a population of 12,261 by 2050 (San Luis Obispo County Council of Governments [SLOCOG] 2017). As described in Section 14.XIV, *Population and Housing*, the proposed project would result in a growth of approximately 92 residents, which would not exceed the San Luis Obispo Council of Governments’ 2050 Regional Growth Forecast which his utilized by SLOAPCD to forecast future emissions. Therefore, the proposed project would have a less than significant impact related to conflicts with an air quality plan.

LESS THAN SIGNIFICANT IMPACT

- b. *Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?*

SLOAPCD is required to monitor air pollutant levels to ensure National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) for criteria air pollutants are met. If these standards are met for a specific pollutant, the SCCAB is classified as being in “attainment.” If these standards are not met for a specific pollutant, the SCCAB is classified as being in “nonattainment” and SLOAPCD is required to develop strategies to attain unmet standards. According to SLOAPCD, the SCCAB is currently in nonattainment for the NAAQS 8-hour ozone³ and the CAAQS 8-hour ozone, 1-hour ozone, 24-hour particulate matter less than 10 microns in diameter (PM₁₀), and the annual PM₁₀ standards (SLOAPCD 2024).

SLOAPCD has established thresholds of significance to be used for short-term construction and long-term operation (SLOAPCD 2023). These thresholds, shown in Table 1, are used to determine if a project would emit a cumulatively considerable net increase of a criteria pollutant.

Table 1 SLOAPCD Criteria Air Pollutant Thresholds for Construction and Operation

Pollutant	Construction Threshold			Operational Threshold	
	Daily (lbs/day)	Quarterly Tier 1 (tons)	Quarterly Tier 2 (tons)	Daily (lbs/day)	Annual (tons/year)
ROG + NO _x (combined) ¹	137.00	2.50	6.30	25.00	25.00
Diesel Particulate Matter (DPM) ¹	7.00	0.13	0.32	1.25	–
Fugitive Particulate Matter (PM ₁₀), Dust	–	2.50	–	25.00	25.00
CO	–	–	–	550.00	–

ROG = reactive organic gas; NO_x = oxides of nitrogen; PM₁₀ = particulate matter less than 10 microns in diameter; CO = carbon monoxide; lbs = pounds

¹ SLOAPCD specifies that CalEEMod winter emission outputs should be compared to operational thresholds for these pollutants (2012). Source: SLOAPCD 2012

³ Non-attainment in eastern San Luis Obispo County/attainment in western San Luis Obispo County.

The California Emissions Estimator Model (CalEEMod) version 2022.1.1.22 was used to estimate the project’s potential air pollution emissions. CalEEMod uses project-specific information, including the project’s land uses, construction equipment parameters, and location, to model a project’s construction and operational emissions. Demolition and construction emissions modeled include emissions generated by onsite construction equipment, soil and other construction material haul trips, and vehicle trips associated with construction, including both worker and vendor trips. Operational emissions are based primarily on energy use for residences and vehicle trips. The analysis that follows reflects the proposed project as described in Section 9, *Description of Project*.

Demolition and Construction

Demolition and construction of the project would result in temporary increases in air pollutant emissions associated primarily associated with fugitive dust (PM₁₀) and exhaust emissions from heavy construction equipment and construction vehicles. Table 2 and Table 3 show estimates of maximum quarterly and daily construction emissions associated with the proposed development and compare the emissions with the applicable SLOAPCD significance thresholds.

Table 2 Quarterly Construction Emissions

Pollutant	Maximum Quarterly Emissions (tons)	Significance Threshold (tons)	Significant Impact?
Ozone Precursors (ROG + NO _x)	1.0	2.5	No
Fugitive Particulate Matter (PM ₁₀)	<0.1	2.5	No
DPM ²	<0.1	2.5	No

¹ Quarterly emissions were calculated by dividing maximum annual construction emissions by 4, since construction activities would extend for a duration exceeding 90 days, as recommended by SLOAPCD.

²The DPM estimations were derived from the “PM₁₀ Exhaust” output from CalEEMod as recommended by SLOAPCD. This estimation represents a conservative scenario because it includes other PM₁₀ exhaust other than DPM.

See Appendix A for CalEEMod worksheets.

Table 3 Maximum Daily Construction Emissions

Pollutant	Total Emissions	Significance Threshold	Significant Impact?
Ozone Precursors (ROG + NO _x)	78.3	137	No
Diesel Particulate Matter (DPM)	1.5	7	No
CO	40.3	550	No
SO _x	0.11	250	No
PM ₁₀	4.9	100	No
PM _{2.5}	2.8	100	No

¹ The DPM estimations were derived from the “PM₁₀ Exhaust” output from CalEEMod as recommended by SLOAPCD. This estimation represents a conservative scenario because it includes other PM₁₀ exhaust other than DPM.

See Appendix A for CalEEMod worksheets.

As shown in Table 2 and Table 3, construction of the proposed project would not generate emissions that would exceed SLOAPCD thresholds. Therefore, construction of the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for the region. This impact would be less than significant .

Operation

Operational emissions are generated by onsite and off-site stationary and area sources and by mobile sources. Examples of stationary sources include water heaters and appliances. Area source emissions include releases from combustion to heat buildings, architectural coatings, landscaping equipment exhaust, aerosol products, and similar activities at the project site. Mobile emissions include releases of emissions from vehicle trips from residences Table 4 and Table 5 summarize the daily and annual operational emissions that would result from the project and compare the emissions with the applicable SLOAPCD significance thresholds.

Table 4 Daily Operational Emissions

Pollutant	Total Emissions (lbs/day)	Significance Threshold (lbs/day)	Significant Impact?
Ozone Precursors (ROG + NO _x)	6.7	25	No
CO	12.6	550	No
Fugitive Particulate Matter (PM ₁₀)	1.9	25	No
Diesel Particulate Matter (DPM)	<0.1	1.25	No

¹ Daily and annual emission thresholds are based on SLOAPCD CEQA Guidelines

² The DPM estimations were derived from the “PM₁₀ Exhaust” output from CalEEMod as recommended by SLOAPCD. This estimation represents a conservative scenario because it includes other PM₁₀ exhaust other than DPM.

CalEEMod – summer operational emission data to compare to operational thresholds, see Appendix A for CalEEMod worksheets.

Table 5 Annual Operational Emissions

Pollutant	Total Emissions (tons/year)	Significance Threshold (tons/year)	Significant Impact?
Ozone Precursors (ROG + NO _x)	1.2	25	No
Diesel Particulate Matter (DPM)	<0.1	25	No

¹ Daily and annual emission thresholds are based on SLOAPCD CEQA Guidelines

² The DPM estimations were derived from the “PM₁₀ Exhaust” output from CalEEMod as recommended by SLOAPCD. This estimation represents a conservative scenario because it includes other PM₁₀ exhaust other than DPM.

CalEEMod – summer operational emission data to compare to operational thresholds, see Appendix A for CalEEMod worksheets.

As shown in Table 4 and Table 5, operation of the project would not generate emissions that would exceed adopted SLOAPCD emissions thresholds. Therefore, project operation would not result in a cumulatively considerable net increase of any criteria pollutant for the region. This impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

c. Would the project expose sensitive receptors to substantial pollutant concentrations?

Land uses such as schools, daycare centers, hospitals, or senior centers are sensitive to poor air quality conditions because infants, the elderly, and people with respiratory ailments are more susceptible to air quality-related health problems than the general public. Residential areas are also considered sensitive to air pollution because residents (including children and the elderly) tend to be at home for extended periods of time, resulting in sustained exposure to any pollutants present. Near the project site, potential sensitive receptors include residences located adjacent to the north, south, and west of the project site, as well as the future residents that would inhabit the proposed new residential units.

Air quality impacts to sensitive receptors would occur primarily through haul truck emissions as trucks travel along Panorama Drive and area residential roadways to reach the project site and fugitive dust generation during grading. The potential for project construction to expose sensitive receptors to substantial pollutant concentrations is discussed in the following subsections.

Criteria Pollutant and Fugitive Dust Emissions

As discussed under Checklist Item 3b, project construction would result in emissions of criteria pollutants, including fugitive dust, reactive organic compounds, and nitrogen oxides. As shown in Table 2 through Table 5 under Checklist Item 3b, the project would not generate air pollutant emissions that would exceed adopted SLOAPCD emissions thresholds during construction activities or project operation.

Carbon Monoxide Hotspots

Traffic-congested roadways and intersections have the potential to generate elevated localized carbon monoxide levels (i.e., carbon monoxide hotspots). In general, carbon monoxide hotspots occur in areas with poor circulation or areas with heavy traffic. The project would result in a minor increase in vehicle traffic along SR 1, Panorama Drive, and area residential roadways as a result of worker vehicle trips, delivery of heavy-duty equipment and materials, and haul trips during project construction. The project site is located in a residential area of Morro Bay, which is not adjacent to high-density commercial or residential buildings, and does not experience heavy traffic. Project-related traffic would not cause or contribute to potential temporary carbon monoxide hotspots. Therefore, the project would not expose sensitive receptors to substantial concentrations of carbon monoxide.

Toxic Air Contaminants

Toxic air contaminants (TACs) are a diverse group of air pollutants that may cause or contribute to an increase in deaths or serious illness, or that may pose a present or potential hazard to human health. TACs generally consist of four types: organic chemicals, such as benzene, dioxins, toluene, and perchloroethylene; inorganic chemicals such as chlorine and arsenic; fibers such as asbestos; and metals such as mercury, cadmium, chromium, and nickel. The primary TAC emitted by project implementation would be diesel particulate matter generated by heavy-duty equipment and diesel-fueled delivery and haul trucks during construction activities.

Construction activities would be temporary and transient (i.e., would move from location to location) and would not generate emissions in a fixed location for extended periods of time. Haul trucks that would travel along Panorama Drive and other local residential roadways would potentially expose single-family residences to temporary and incremental increases in diesel particulate matter. Construction would occur over approximately 25 months, with the site preparation and grading phases of the project that would be supported by haul truck trips lasting between approximately 9 and 12 months. Generation of DPM from construction projects typically occurs in a single area for a short period of time. The dose to which the receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the extent of exposure that person has to the substance. Dose is positively correlated with time, meaning a longer exposure period would result in a higher exposure level for the maximally exposed individual. The risks estimated for a Maximally Exposed Individual are higher if a fixed exposure occurs over a longer period of time. According to the California Office of Environmental Health Hazard Assessment, health risk assessments, which

determine the exposure of sensitive receptors to toxic emissions, should be based on a 30-year exposure period (Office of Environmental Health Hazard Assessment). Construction would represent approximately 3 percent of the exposure period typically utilized for health risk assessments, and therefore would not result in the type of long-term exposure that could generate substantial health impacts to residential receptors along Panorama Drive and other local residential roadways.

DPM exposure during the site preparation and grading phases of construction would be further reduced with implementation of a Construction Management Plan, which would be a City-required Condition of Approval for the project, requiring haul routes to be distributed among local roadways such that substantial TAC emissions do not concentrate on a particular residential street proximate to the project site. Construction activities would also be subject to California regulations limiting the idling of heavy-duty construction equipment to no more than five minutes. As described in Table 2 and Table 3, diesel particulate matter emissions generated during project construction would be well under SLOAPCD quarterly and daily significance thresholds. Compliance with existing regulations, and the temporary nature of construction, demolition, and haul truck emissions, would ensure sensitive receptors would not be exposed to substantial TAC concentrations. This impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- d. *Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?*

During construction activities, heavy equipment and vehicles would emit odors associated with vehicle and engine exhaust and during idling. Project construction would also generate transitory odors along haul truck routes. These odors would be intermittent and temporary and would cease upon completion. Once constructed and occupied, residential land uses do not typically produce substantial emissions with significant odor impacts, and the project does not involve development of any new land uses with potential to cause significant odor impacts. As such, the project would not result in objectionable odors affecting a substantial number of people.

NO IMPACT

14.IV Biological Resources

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

Impact Analysis

- a. *Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*
- b. *Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*
- c. *Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*
- d. *Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?*
- e. *Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*
- f. *Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?*

The project site is generally flat, located on the base of a southwest facing slope, with elevations ranging from approximately 79 to 145 feet (24 to 44 meters). The site is mostly vacant with scattered trees and contains mapped ESHA along the northerly portion of the project boundary along the natural path of historic storm water drainage. Three abandoned operations buildings, a control building, and an asphalt parking lot are present near the site entrance, adjacent to Panorama Drive. The property is highly disturbed and dominated by a mixture of non-native annual grasses and forbs. An unnamed drainage is present along the northwestern perimeter of the property and conveys flows from the upslope hillside into a culvert located north of the control building and paved parking lot, and ultimately into the Pacific Ocean.

Construction of the project has the potential to adversely affect biological resources and/or conflict with policies intended to protect biological resources on the project site. The unnamed storm water drainage and associated riparian vegetation are within the jurisdiction of the California Department of Fish and Wildlife (CDFW) and Regional Water Quality Control Board (RWQCB), while the bed, below the ordinary high water mark, is within the jurisdiction of the U.S. Army Corps of Engineers (USACE). In accordance with the City's Local Coastal Plan, those communities identified on site as coastal streams/riparian habitats and suitable habitat for rare and endangered species (i.e., the unnamed ephemeral drainage) are considered ESHA (City of Morro Bay 2021a). Any impacts to the drainage that fall under the jurisdiction of the CDFW, RWQCB, and/or USACE will require appropriate regulatory agency permits.

The applicant has prepared a draft Biological Resources Assessment and draft Arborist Report for the proposed project. The purpose of these evaluations is to identify sensitive biological resources that occur or have potential to occur within the proposed project site and surrounding areas, and to recommend avoidance and minimization measures to reduce any potential impacts to sensitive biological resources to the extent feasible. As necessary, this BRA may be used to support the

environmental review process and future project permitting. These evaluations are currently undergoing City review. Accordingly, potential environmental impacts to biological resources associated with Checklist Items 4a through 4f will be further studied in an EIR.

POTENTIALLY SIGNIFICANT IMPACT

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14.V Cultural Resources

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

Impact Analysis

- a. *Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?*
- b. *Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?*
- c. *Would the project disturb any human remains, including those interred outside of formal cemeteries?*

The project site is located on a hilltop with scattered trees and an unnamed creek running along the northern boundary of the site. The project vicinity includes expansive residential development to the west and undeveloped rolling hills to the north, south, and east. The site is approximately 100 feet above sea level. Soils in the project site vicinity area are mapped as Diablo and Cibo clay loams, which consists of residuum weathered from sandstone and/or shale (USDA 2016). The following structures and infrastructure remain onsite: a 25-foot by 30-foot electrical transformer building, 28-foot by 30-foot concrete office building, and a 25-foot by 40-foot garage/shed; driveways, steps, walkways, asphalt, and concrete in the pump area; water supply and storm drain lines; and a portion of the 6-inch diameter fuel pipeline, which was abandoned in place. Surficial soils onsite have been previously disturbed from previous use of the site.

The extensive grading and excavation proposed for onsite development would create the possibility for unintentionally impacting historic/archaeological resources beneath the surface during project construction. The applicant has prepared a Cultural Resources Inventory and Monitoring Plan for the proposed project. . The purpose of these evaluations is to identify sensitive archaeological or historical resources that occur or have potential to occur within the proposed project site and surrounding areas, and to recommended mitigation measures to avoid or minimize potential impacts to archaeological or historical resources. These evaluations are currently undergoing City

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review. Accordingly, potential impacts to cultural resources associated with Checklist Items 5a through 5c will be further studied in an EIR.

POTENTIALLY SIGNIFICANT IMPACT

14.VI Energy

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

Environmental Setting

California is one of the lowest per capita energy users in the United States, ranked 48th in the nation, due to its energy efficiency programs and mild climate (United States Energy Information Administration 2022). Electricity and natural gas are primarily consumed by the built environment for lighting, appliances, heating and cooling systems, fireplaces, and other uses such as industrial processes in addition to being consumed by alternative fuel vehicles. Most of California’s electricity is generated in-state; however, the state relies on out-of-state natural gas imports for nearly 90 percent of its supply (California Energy Commission [CEC] 2022a; CEC 2022b). In addition, approximately 33.6 percent of California’s electricity supply in 2021 came from renewable energy sources, such as wind, solar photovoltaic, geothermal, and biomass (CEC 2022a). In 2018, Senate Bill 100 accelerated the state’s Renewable Portfolio Standards Program, codified in the Public Utilities Act, by requiring electricity providers to increase procurement from eligible renewable energy and zero-carbon resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045. PG&E maintains the electricity distribution lines, natural gas lines, and substations that serve the project area, and electricity is provided by Central Coast Community Energy.

Petroleum fuels are primarily consumed by on-road and off-road equipment in addition to some industrial processes. Gasoline, which is used by light-duty cars, pickup trucks, and sport utility vehicles, is the most utilized transportation fuel in California with approximately 12.6 billion gallons sold in 2020 (CEC 2022d). Diesel, which is used primarily by heavy-duty trucks, delivery vehicles, buses, trains, ships, boats and barges, farm equipment, and heavy-duty construction and military vehicles, is the second most utilized fuel in California with 1.7 billion gallons sold in 2020 (CEC 2022c, CEC 2022d).

Energy consumption is directly related to environmental quality in that the consumption of nonrenewable energy resources release criteria air pollutant and greenhouse gas (GHG) emissions into the atmosphere. The environmental impacts of air pollutant and GHG emissions associated with the project’s energy consumption are discussed in detail in Section 14.III, Air Quality, and 14.VIII, *Greenhouse Gas Emissions*, respectively.

Impact Analysis

- a. *Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?*

Construction

During project construction, energy would be consumed in the form of petroleum-based fuels used to power off-road construction vehicles and equipment on the project site, construction worker travel to and from the project site, and vehicles used to deliver materials to the site. Energy use during construction would be temporary in nature, and construction equipment would be typical of similar-sized construction projects in the region. Construction contractors would be required to comply with the provisions of California Code of Regulations Title 13 Sections 2449 and 2485, which prohibit diesel-fueled commercial motor vehicles and off-road diesel vehicles from idling for more than five minutes and would minimize unnecessary fuel consumption. Construction equipment would be subject to the United States Environmental Protection Agency Construction Equipment Fuel Efficiency Standard, which would minimize inefficient, wasteful, or unnecessary fuel consumption. It is reasonable to assume that construction contractors would not utilize fuel in a manner that is wasteful or unnecessary to reduce construction costs. Additionally, the project would require minimal use of electricity during construction. Therefore, the project would not involve the inefficient, wasteful, and unnecessary use of energy during construction.

Operation

Operation of the project would contribute to regional energy demand by consuming electricity, natural gas, and gasoline and diesel fuels. Natural gas and electricity would be used for heating and cooling systems, lighting, appliances, and water and wastewater conveyance, among other purposes. Gasoline and diesel consumption would be associated with vehicle trips generated by residents. The project would be required to comply with all standards set in the latest iteration of the California Building Standards Code (California Code of Regulations Title 24), which would minimize the wasteful, inefficient, or unnecessary consumption of energy resources by the built environment during operation. California's CALGreen standards (California Code of Regulations Title 24, Part 11) require implementation of energy-efficient light fixtures and building materials into the design of new construction projects. Furthermore, the current Building Energy Efficiency Standards (California Code of Regulations Title 24, Part 6) require newly constructed buildings to meet energy performance standards set by the CEC. These standards are specifically crafted for new buildings to result in energy efficient performance so that the buildings do not result in wasteful, inefficient, or unnecessary consumption of energy. In addition, pursuant to CALGreen, all plumbing fixtures used for the project would be high-efficiency fixtures, which would minimize the potential the inefficient or wasteful consumption of energy related to water and wastewater. Therefore, project operation would not result in potentially significant environmental effects due to the wasteful, inefficient, or unnecessary consumption of energy. Overall, this impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

b. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

The City of Morro Bay CAP was adopted by the City Council in 2014. The CAP regulates city government operations, energy, solid waste, land use, transportation, and tree removal. The CAP includes policies and actions that reduce greenhouse gas emissions within Morro Bay. Of these policies and actions, CAP Measure TL-6 relates to energy efficiency in project design. CAP Measure TL-6 recognizes that energy-efficient designs or growth that facilitates mixed-use, higher density, and infill development near transit stops allows for more efficient use of existing infrastructure and improves city-wide efforts to reduce GHG emissions (City of Morro Bay 2014). CAP Measure O-1 requires the following actions to reduce GHG emissions from construction vehicles and equipment:

- Three percent of construction vehicles and equipment shall be electrically-powered or use alternative fuels such as compressed natural gas, and
- The contractor will limit idling of construction equipment to three minutes and will post signs to that effect.

Appendix C of the CAP contains a CAP Compliance Worksheet, which includes mandatory and voluntary emissions reduction measures used by the City to demonstrate project-level compliance with the CAP. Mandatory measures include provision of bicycle routes, pedestrian linkages and interconnectivity, and use of energy-efficient construction equipment techniques. The project's design incorporates the mandatory measures of the CAP that would potentially reduce energy use, such as implementation of a pedestrian network and implementation of shared-use roads for bicycles. Construction equipment would be required to limit idling in compliance with the provisions of California Code of Regulations Title 13 Sections 2449 and 2485. The project would also be required to comply with applicable CALGreen energy efficiency policies. Therefore, the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, and this impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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14.VII Geology and Soils

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
1. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The geology and soils analysis provided herein is based on a Soils Engineering Report prepared by GeoSolutions in June 2023 and an Engineering Geology Investigation Update prepared by GeoSolutions in August 2023. These reports are included as Appendix B-1 and B-2, respectively.

Environmental Setting

Morro Bay is located within the Coast Range Geomorphic Province, which extends along the coastline from central California to Oregon. This region is characterized by extensive folding, faulting, and fracturing of variable intensity. In general, the folds and faults of this province comprise the pronounced northwest trending ridge-valley system of the central and northern coast of California.

The site is located in the vicinity of the San Luis Range of the Coast Range Geomorphic Province of California. The Coast Ranges lie between the Pacific Ocean and the Sacramento-San Joaquin Valley and trend northwesterly along the California Coast for approximately 600 miles between Santa Maria and the Oregon border. Locally, the site is underlain primarily by fill, landslide deposits, Colluvial and Alluvial deposits, and Franciscan Complex units. The project site is not located within a liquefaction hazard zone. According to the Soils Engineering Report, soil materials at the site have medium to very high expansion potential and groundwater was encountered at 28 feet below ground surface (bgs).

Impact Analysis

- a.1. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?*
- a.2. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?*

The closest known active fault to the project site is an active portion of the Hosgri Fault Zone that is located approximately 8.0 miles southwest of the project site. The San Andreas Fault is the most likely active fault to produce ground shaking at the site although it is not expected to generate the highest ground accelerations due to the 39.5-mile distance between the project site and the fault (Appendix B-1). Although the project site is subject to ground shaking associated with active and/or potentially active faults in the region, project construction and operation would not involve components which require deep excavations, or boring of large areas that could create unstable seismic conditions or stresses in the Earth's crust. The project would be constructed in accordance with the California Building Code (CBC), which provides earthquake design requirements, including earthquake loading specifications for design and construction to resist effects of earthquake motions in accordance with the American Society of Civil Engineers Standard 7-05. CBC standards regulate procedures for soil preparation, including, but not limited to: excavation, grading and earthwork, fills and embankments, expansive soils, foundation investigations, liquefaction potential, and soil strength loss. The City Municipal Code formally adopts the CBC and requires additional seismic safety measures. Compliance with these requirements would reduce seismic ground shaking impacts to the maximum extent practicable with current engineering practices. Since the project would not exacerbate geologic hazards and would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault or strong seismic ground shaking, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- a.3. *Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?*
- a.4. *Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?*
- c. *Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?*
- d. *Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?*

The City Municipal Code requires geologic evaluation and soil investigation for new subdivision projects. Accordingly, GeoSolutions prepared a Soils Engineering Report in June 2023 and an Engineering Geology Investigation Update in August 2023, which are included as Appendix B-1 and B-2, respectively. The project would be required to incorporate the Soils Engineering Report and Engineering Geology Investigation recommendations into the project construction and design plans.

Portions of the project site are located within a mapped large landslide complex which extends to the south and is considered active. Recommendations in the Engineering Geology Investigation included locating buildings away from the deposits, no locating grading or roadways within the deposit locations, and maintaining 10 foot buffers from such areas for proposed structures. An additional mapped landslide is located east of the northern portion of the site within an existing gully; however, any reactivation of these deposits would mobilize material into an existing drainage gully away from the site, and there is low potential for this mapped landslide to affect the site (Appendix B-2). Additional soil hazards are present at the site, such as expansive surface soils and potential for differential settlements associated with expansive fill materials. These hazards would be minimized through site-specific design measures, including graded pads with all foundations excavated into engineered fill.

Compliance with CBC, City Municipal Code, and standard Conditions of Approval requiring implementation of geotechnical considerations in the project design, would ensure the project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving liquefaction or create substantial direct or indirect risks to life or property due to expansive soil hazards. As a result, the project would not exacerbate geologic hazards on the site, and this impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- b. *Would the project result in substantial soil erosion or the loss of topsoil?*

Construction of the project would result in ground disturbance activities, which could create the potential for soil erosion and loss of topsoil. The project would be subject to the National Pollutant Discharge Elimination System (NPDES) Construction General Permit, which requires the development of a Stormwater Control Plan (SWCP) or Storm Water Pollution Prevention Plan (SWPPP). The SWCP/SWPPP would include BMPs to control erosion and sediment release. Section 14.48.140 of the City Municipal Code requires compliance with the NPDES permit during construction activities. Typical BMPs include installation of silt fences, erosion control blankets, and anti-tracking pads at site exists to prevent off-site transport of soil materials. Compliance with City Municipal Code requirements, Implementation of a RWQCB SWCP/SWPPP, and adherence to City-

required erosion and minimization control measures and BMPs would minimize potential for soil erosion or loss of topsoil. Therefore, this impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- e. *Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?*

The project would connect to the City's sewer system. Therefore, no impact related to the use of septic tanks or alternative wastewater disposal systems would occur.

NO IMPACT

- f. *Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*

The project site is underlain by Franciscan rock complex. According to Plan Morro Bay, the Pismo Formation and Pleistocene-aged alluvial deposit geologic units in the vicinity of Morro Bay are known to contain paleontological resources (Morro Bay 2017). Additionally, quaternary older alluvium (Pleistocene-age), mapped in the City, is sensitive for paleontological resources in California. There are no mapped Pismo Formation geologic units within City limits, and fossil-bearing sediments in the Morro Bay area are predominantly located on State parks land and offshore. There are no known unique paleontological resources or unique geological features located within the project site.

Nonetheless, nearby rock formations in the City are considered sensitive and the potential for anticipated discovery of paleontological resources at the project site cannot be ruled out. If project construction activities were to damage a paleontologically sensitive resource, this is a potentially significant impact. Mitigation Measures GEO-1 and GEO-2 are required, ensuring a worker's awareness program is in place during construction and adequate procedures are followed in case of unanticipated discovery. With implementation of Mitigation Measures GEO-1 and GEO-2, this impact would be less than significant with mitigation incorporated.

Mitigation Measures

GEO-1 Paleontological Worker Environmental Awareness Program

The project applicant shall conduct a paleontological Worker Environmental Awareness Program (WEAP). Prior to the start of construction, a Qualified Professional Paleontologist (as defined by the Society for Vertebrate Paleontology Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources [SVP 2010]) or their designee shall conduct a paleontological WEAP training for construction personnel regarding the appearance of fossils and the procedures for notifying paleontological staff should fossils be discovered by construction staff.

GEO-2 Unanticipated Discovery of Paleontological Resources

In the event a fossil is discovered during soil disturbing activities, work within 50 feet of the find shall be temporarily halted or delayed until the discovery is examined by a Qualified Professional Paleontologist. The project proponent shall include a standard inadvertent discovery clause in the construction contract to inform contractor(s) of this requirement. If the find is determined to be significant, the project proponent shall retain a Qualified Professional Paleontologist to direct all

mitigation measures related to paleontological resources. The Qualified Professional Paleontologist shall design and carry out a data recovery plan consistent with the SVP (2010) standards.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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14.VIII Greenhouse Gas Emissions

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

Environmental Setting

Gases that trap heat in the atmosphere are known as GHGs. GHGs allow sunlight to enter the atmosphere but trap a portion of the outward-bound infrared radiation that warms the air. The process is similar to the effect greenhouses have in raising the internal temperature of the structure. Both natural processes and human activities emit GHGs. The accumulation of GHGs in the atmosphere regulates the Earth’s temperature, but emissions from human activities (such as fossil fuel-based electricity production and the use of motor vehicles) have elevated the concentration of GHGs in the atmosphere. The gases widely seen as the principal contributors to human-induced climate change include carbon dioxide (CO₂), methane (CH₄), nitrous oxides (N₂O), fluorinated gases such as hydrofluorocarbons (HFCs) and perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆). Water vapor is excluded from the list of GHGs because it is short-lived in the atmosphere, and natural processes, such as oceanic evaporation, largely determine its atmospheric concentrations.

Impact Analysis

- a. *Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?*

Calculations of CO₂, CH₄, and N₂O emissions are provided to identify the magnitude of potential project effects. Emissions of all GHGs are converted into their equivalent weight in CO₂ (CO₂e). GHG emissions for project construction and operation were calculated using CalEEMod version 2022.1.1.22 with assumptions described under Section 14.III, *Air Quality*. Construction emissions were amortized over the project’s estimated 30-year lifetime as construction emissions are confined to a relatively short period of time in relation to the overall life of the project.

The City’s CAP was developed to be consistent with State CEQA Guidelines Section 15183.5 and SLOAPCD’s *CEQA Air Quality Handbook* to mitigate emissions and climate change impacts and serves as a Qualified GHG Reduction Strategy for the City of Morro Bay. However, the City’s CAP only forecasts GHG emissions to 2020, consistent with Assembly Bill 32 (AB 32) which was, at the time of preparation of the City’s CAP (2014) the applicable regulation which set forth GHG emissions

reduction targets to the year 2020. The climate action measures within the City’s CAP were intended to reduce GHG emissions produced within the City in accordance with the 2020 targets established by AB 32. However, the City has not yet updated their CAP to be consistent with the GHG emissions reduction targets established by Senate Bill 32, AB 1279, and the California Air Resource Board, which together implement a goal to ultimately achieve carbon neutrality by 2045. Therefore, utilizing the City’s CAP for the purposes of this analysis is not appropriate. Instead, SLOAPCD’s 2023 GHG emission thresholds were used to evaluated to the level of significance for this project. SLOAPCD provides the following two options to assess a project’s GHG emissions and states either threshold type can be used to determine consistency toward a state GHG reduction target (SLOAPCD 2023):

- **Bright-Line Threshold.** The project would have a significant impact if it exceeds the 2027 “bright-line threshold” of 780 metric tons CO₂e/year; or,
- **Efficiency Threshold.** The project would have a significant impact if it exceeds the 2027 efficiency threshold of 3.6 metric tons of CO₂e/service population/year. The service population is defined as the number of residents plus employees for a given project

For the purposes of this analysis, SLOAPCD’s 2027 Bright-Line threshold of 780 metric tons CO₂e/year is used to analyze the proposed project’s potential to emit substantial GHG emissions. The bright-line threshold is utilized because SLOAPCD utilizes the bright-line thresholds to determine levels of significance for smaller, single land use development projects (SLOAPCD 2023). As stated by SLOAPCD, if emissions are at or below an applicable threshold for the operational year, the project is doing its fair share toward achieving the State’s GHG emissions reductions targets.

Construction of the project would generate temporary GHG emissions primarily as a result of construction equipment operating onsite as well as from vehicles transporting construction workers to and from the project site and heavy trucks transportation building materials and soil. As shown in Table 6, construction activity associated with the project would generate an estimated 926 metric tons of CO₂e. Amortized over a 30-year period, construction of the project would generate approximately 31 metric tons of CO₂e per year.

Table 6 Estimated Construction Emissions of Greenhouse Gases

	Annual Emissions (Carbon Dioxide Equivalent [CO ₂ e])
Total Estimated Construction Emissions	926 metric tons
Total Amortized over 30 Years	31 metric tons per year

See Appendix A for calculations and for GHG emission factor assumptions.

Long-term operational emissions include emissions from energy consumption and natural gas, waste generation, and water and wastewater conveyance. Table 7 shows the combined construction and operational GHG emissions associated with the project.

Table 7 Combined Annual Emissions of Greenhouse Gases

Emission Source	Annual Emissions
Construction	31 metric tons CO ₂ e
Operational	
Area	1 metric tons CO ₂ e
Energy	124 metric tons CO ₂ e
Solid Waste	6 metric tons CO ₂ e
Water	6 metric tons CO ₂ e
Mobile	344 metric tons CO ₂ e
Total	512 metric tons CO₂e
Threshold	780 metric tons CO ₂ e
Threshold Exceeded?	No

Sources: See Appendix A for calculations and for GHG emission factor assumptions.

As shown in Table 7, the combined annual emissions would total 512 metric tons per year of CO₂e. These emissions do not exceed the applicable SLOAPCD threshold of 780 metric tons per year of CO₂e. Therefore, the project would not generate GHG emissions that would result in adverse effects on the environment and this impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

b. Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

The Morro Bay CAP provides GHG emission reduction measures for City government operations, energy, solid waste, land use, transportation, and tree removal. As discussed in Section 14.VI, *Energy*, Appendix C of the CAP includes a CAP Compliance Worksheet, which provides mandatory and voluntary emissions reduction measures used by the City to demonstrate project-level compliance with the CAP. The project would comply with the mandatory measures from Appendix C of the CAP, including implementation of a pedestrian network and implementation of shared-use roads for bicycles. Construction equipment would be required to limit idling in compliance with the provisions of California Code of Regulations Title 13 Sections 2449 and 2485. As described in Section 14.III, *Air Quality*, the project would also comply with applicable CALGreen energy efficiency policies. Therefore, the project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions and this impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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14.IX Hazards and Hazardous Materials

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. For a project located in an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Environmental Setting

The City of Morro Bay's Multi-Hazard Emergency Response Plan and Local Hazard Mitigation Plan (LHMP) outline policies and concepts for responding to earthquakes, hazardous material releases, storm and flooding, wildland fire, nuclear emergencies, and tsunamis. The Emergency Response Plan was adopted in 2003 and was most recently revised in 2019 (City of Morro Bay 2019a and 2019b). The Emergency Response Plan identifies State Routes 1 and 41 as the major transportation arteries serving the City, which would serve as the primary transportation routes in the event of an evacuation. The Morro Bay Fire Department (MBFD) manages the City's Emergency Operations Center and is responsible for updating disaster plans and responding to emergencies within the city, including evacuations (City of Morro Bay 2021b).

The project site was previously used by the Department of the Navy as a jet fuel storage and distribution facility. Demolition and removal of the fuel tanks and related equipment has already been completed. The following structures and infrastructure remain on the project site:

- A 25' by 30' electrical transformer building, 28' by 30' concrete office building, and a 25' by 40' garage/shed;
- Driveways, steps, walkways, asphalt, and concrete in the pump area;
- Water supply and storm drain lines; and
- A portion of the 6-inch diameter fuel pipeline located adjacent to the ESH area, which was abandoned in place.

Impact Analysis

- a. *Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*
- b. *Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?*

Construction activities would involve the use of potentially hazardous materials, such as vehicle fuels and fluids, which could be released should a spill or leak occur. The transport, use, and storage of hazardous materials during construction of the project would be required to be conducted in accordance with all applicable State and federal laws, such as the Hazardous Material Transportation Act, Resource Conservation and Recovery Act, the California Hazardous Materials Management Act, and California Code of Regulations Title 22. If hazardous materials are required to be transported on State highways and routes, Caltrans regulates the safe transportation of hazardous materials on State highways and routes, as described in Title 49 of the Code of Federal Regulations. These regulatory safeguards minimize exposure of the public and environment to a potential release of hazardous materials during construction.

Residential land uses are typically not associated with the use, transportation, storage, or generation of significant quantities of hazardous materials. Operation of the project may result in an incremental release in the use of common household hazardous materials such as cleaning and degreasing solvents. Use of these materials would create minimal hazard to the public or environment. Existing programs within the city provide for the safe disposal of household hazardous waste. Project operation would not create a significant hazard through the routine transport, use, or

disposal of hazardous materials, or due to upset and accident conditions involving the release of hazardous materials and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- c. *Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?*

The nearest schools to the project site are Central Coast Montessori School, approximately 0.2-mile to the southwest, and Del Mar Elementary School, located approximately 0.5-mile to the south of the project site. As discussed above under Checklist Questions (a-b), the transport, use, and storage of hazardous materials during construction of the project would be conducted in accordance with all applicable State and federal laws. The project would not emit hazardous emissions or handle acutely hazardous materials, substances, or waste within 0.25-mile of an existing or proposed school.

LESS THAN SIGNIFICANT IMPACT

- d. *Would the project be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?*

In March 2022, Analytical Consulting Group (Analytical) prepared a Site Assessment Report and Request for Site Closure (Closure Report) for the former tank farm located onsite. The Closure Report briefly summarized the site's history as a Central Coast RWQCB cleanup site, previous site assessments, and the assessment that Analytical conducted. The objective of the Closure Report was to assess the current concentrations of previously detected impacts, assess areas not previously evaluated, and to conduct a human health risk assessment (HHRA) to evaluate whether the detected concentrations posed a health risk. Analytical's assessment consisted of collecting soil and rock samples from up to 50 ft bgs and analyzing them for total petroleum hydrocarbons (TPH), volatile organic compounds (VOCs), and/or Title 22 Metals.

Based on the analytical results and the HHRA, Analytical concluded that residual TPH and associated VOCs were below risk-based Department of Toxic Substances Control (DTSC) screening levels (SLs) for a residential site use. Arsenic, cobalt, lead, nickel, and mercury were above residential SLs, but the Closure Report states that except for lead, heavy metal concentrations are likely associated with the naturally occurring serpentinite rocks. Analytical further concluded that lead was detected at discrete concentrations that are elevated compared to background levels and the residential SLs, but the average concentration is below the residential SL. Overall, Analytical concluded that no excess health risk was posed by residual contamination.

Analytical did not recommend any further investigation, but suggested that a Soil Management Plan (SMP) be prepared to provide guidance for the proper management of any impacted soil that is encountered during redevelopment activities. The Closure Report further recommends that the SMP include a plan for removing the upper 6 to 12 inches of soil to address lead impacts, surficial soil testing of lead post-grading, and the placement of topsoil to protect against naturally occurring asbestos associated with the onsite serpentinite. Based on these findings and recommendations, Analytical requested that the site be closed. As of July 2024, the date of this Initial Study, the Central Coast RWQCB has not made a determination to close the site or not.

Although the site is currently under RWQCB oversight, the agency has not issued comments on the Closure Report or made a determination regarding closure of the case. Ultimately, it is the RWQCB's

role to assess whether the methodology, conclusions, and recommendations presented in the Closure Report are consistent with current regulatory standards. As a result, this impact remains potentially significant at the time of this report, and will be further studied in an EIR.

POTENTIALLY SIGNIFICANT IMPACT

- e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?*

The nearest airports to the project site are the Santa Margarita Ranch Airport, approximately 12 miles to the east, and San Luis Obispo County Regional Airport, approximately 17 miles to the southeast. Since the project site is not within an airport land use plan, or within two miles of a public or private airport, the project would not expose future residents or workers to aviation-related safety hazards or excessive noise. No impact would occur.

NO IMPACT

- f. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

Heavy truck deliveries and off-site hauling trips would be routed from State Route 1; construction activities and staging areas for the project would be limited to the project site and would not require roadway closures, detours, or other impacts to highways or arterial roadways. Emergency access to the project site would be maintained throughout the construction and operation. Therefore, project construction would not impair or physically interfere with an adopted emergency response plan or evacuation plan.

In the event of an emergency that could affect the health, safety, and property of the public during operation of the project, the policies and general approach of the Emergency Response Plan would apply. The Emergency Response Plan implements the City's LHMP, which is part of the County of San Luis Obispo's Multi-Jurisdictional LHMP. The policies and general approach to emergency situations delineated in the Plan follow a number of widely adopted emergency response standards and operations protocols, including the National Incident Management System, the State Emergency Management System, and the Incident Command System.

The project site's accessibility, location, regional emergency access and evacuation routes would be subject to the approval of the MBFD. The MBFD would be responsible for final review and approval of the applicant's building plans. Project site design, including property ingress and egress, would be required to provide safe, adequate, and usable site access to pedestrians and vehicles as required by Section 17.27.110 of the City's Municipal Code. Compliance with the provisions of the City's Emergency Response Plan and Municipal Code would ensure construction and operation of the project would not substantially impair an adopted emergency response or emergency evacuation plan. This impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- g. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?*

The project site is not located within a State Responsibility Area (SRA) or within a Fire Hazard Severity Zone (FHSZ) as designated by the California Department of Forestry and Fire Protection (CAL FIRE 2007). The nearest Very High FHSZ within an SRA and within a Local Responsibility Area is

located approximately four miles southeast of the project site, east of Morro Bay State Park. The areas immediately north, east, and southeast of the project site are designated as a Moderate FHSZ within a SRA. The project would adhere to the requirements of the California Fire Code to minimize fire risk. Therefore, the project would not expose people or structures to a significant loss, injury or death involving wildland fires.

LESS THAN SIGNIFICANT IMPACT

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14.X Hydrology and Water Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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Would the project:

a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
(i) Result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(iv) Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Environmental Setting

The federal Clean Water Act establishes the framework for regulating discharges to waters of the U.S. to protect their beneficial uses. In California, the State Water Resources Control Board (SWRCB) administers the NPDES permitting program and is responsible for developing NPDES permitting requirements. The Porter-Cologne Water Quality Act (Division 7 of the California Water Code) regulates water quality within California and establishes the authority of the SWRCB and the nine regional water boards. For storm water, development projects are required by the State Board to provide careful management and close monitoring of runoff during construction, including onsite erosion protection, sediment management and prevention of non-storm discharges. The Regional and State Boards issue NPDES permits to regulate specific discharges. The NPDES permit requires that development projects provide for ongoing treatment of storm water on the site, using low-impact design (LID), infiltration, or onsite reuse, to address project runoff using specific design criteria.

The majority of the City is within in the Morro Bay Watershed, which covers 46,598 acres in the central, coastal area of San Luis Obispo County. Waters in the Morro Bay Watershed drain into Chorro and Los Osos Creeks and eventually into Morro Bay. Common sources of water quality degradation in the City include urban land uses and natural sedimentation. BMPs are typically employed during construction to maintain water quality and must be consistent with anticipated pollutant loads and water quality objectives.

Impact Analysis

- a. *Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?*

Erosion and siltation during the construction and operation phases could pollute water quality through runoff. The project would add up to 3.7 acres of new impervious surface, which has the potential to increase stormwater runoff from the project site. Water quality standards and requirements for the project are maintained by the Central Coast RWQCB. The project would be required to comply with NPDES General Permit requirements. The NPDES program controls water pollution by regulating point sources that discharge pollutants into waters of the United States, including construction activity. The project would also be required to implement the City's Stormwater Management Guidance Manual, which requires LID strategies to be incorporated into the final project design and preparation of a SWCP. A SWCP was prepared for the site in 2023, which outlines drainage designs, applies performance requirements, and estimates post-development runoff from the site. As described in the SWCP, runoff from impervious areas would be directed to through onsite filtration and collected into an onsite bioretention area. With incorporation of the design requirements described in the SWCP, the project would not violate any water quality standards or waste discharge requirements.

LESS THAN SIGNIFICANT IMPACT

- b. *Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*
- e. *Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

Water would be provided to the project site by the City of Morro Bay, which receives a majority of its water from the State Water Project (SWP). A small portion of the City's water is supplemented by two local groundwater basins, Morro and Chorro Basins. The majority of the project's future water supply would largely be derived from the SWP and not groundwater. Therefore, the project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. According to the Sustainable Groundwater Management Act Basin Prioritization Dashboard, the project site is in an area defined as low priority for groundwater recharge (Department of Water Resources 2023).

According to the City's 2018 OneWater Morro Bay Plan and the City's 2020 Urban Water Management Plan (UWMP), as discussed in Section 14.XIX, *Utilities and Service Systems*, there are sufficient water sources to serve the City and anticipated development until 2050 or later. Future development would not place an excessive demand on the City's water supplies or conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Therefore, these impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- c.(i) *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site?*
- c.(ii) *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?*
- c.(iii) *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?*
- c.(iv) *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows?*

The topography of the site varies, with level portions of the site giving way to steep slopes up to 10-20 percent; however, the portion of site with proposed development is relatively flat. The project site is primarily undeveloped, with minor amounts of impervious surfaces. Therefore, the project would alter existing drainage patterns. The project would introduce 3.7 acres of impervious surfaces to the project site. As described in the SWCP, runoff from impervious areas would be directed to a biofiltration area to catch runoff, which would then be conveyed to one or more underground retention basins (Appendix C). The proposed basin(s) would retain the 95th percentile storm events

and detain runoff in larger storm events before conveying to an existing City stormwater drainage. The project would reduce the potential for stormwater flows to exceed existing infrastructure capacity by ensuring post-development stormwater runoff does not exceed pre-developed existing conditions.

The project would not alter the existing drainage pattern of the site in a manner which would result in substantial erosion or siltation, flooding, additional sources of polluted runoff, or impede or redirect flood flows. As a result, this impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

d. In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

The lower portion and west side of the site is located within the 100-year or 500-year flood zone based on FEMA flood zone maps. As indicated in the Engineering Geology Investigation Update prepared by GeoSolutions (Appendix B-2), design recommendations include build out of proposed structures above the minimum flood elevation.

Tsunamis and seiches are two types of water waves that are generated by earthquake events. Tsunamis are broad-wavelength ocean waves and seiches are standing waves within confined bodies of water, typically reservoirs. According to the Soils Engineering Report, due to the distance from the Pacific Ocean, and site elevation over 80 feet, the potential for a tsunami to affect the site is low (Appendix B-1). Potential flood risk associated with a seismic event (seiche) is considered low due to the absence of a body of water upslope of the project site. As a result, this impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

14.XI Land Use and Planning

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

Environmental Setting

Currently, most of the project site is vacant, with scattered trees and a mixture of non-native annual grasses and weeds. Following the 2018 demolition and removal of the former fuel tanks and related equipment in 2018, an electrical transformer building, concrete office building, and a garage/shed remain onsite. The project site is located in a developed area and surrounded by residential uses to the north, west, and south. The project site is designated as Medium-Density Residential and is zoned by the City of Morro Bay as Single Family Residential with a Planned Development Overlay District (R-1/PD) with a permitted density of 4.1 units per acre to 7.0 units per acre. The project site includes mapped ESHA along the northerly portion of the project boundary along the natural path of historic storm water drainage. The project site is also located in the City’s Coastal Zone.

Impact Analysis

a. *Would the project physically divide an established community?*

The project site does not currently contain housing, roadways, or other features used to connect the existing community in the project area. The vacant and former structures and infrastructure remaining onsite would be demolished and removed (electrical transformer building, concrete office building, garage/shed) as well as the existing driveways, steps, walkways, asphalt, and concrete in the pump area. Therefore, implementation of the project would not physically divide an established community. There would be no impact.

NO IMPACT

b. *Would the project 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?*

The project would develop residential uses in an area of the City planned and zoned for residential use. The project would be consistent with the City’s Local Coastal Plan Policy Section 30250.a, which requires new residential development to be located contiguous, or in close proximity to, existing developed areas with adequate public services where it would not have adverse significant effects

Panorama Drive Subdivision Project

on coastal resources. The project is consistent with City's Local Coastal Plan Policy Section 30250.a as it includes new residential development located on a contiguous parcel adjacent to residential development to the north, west, and south, and as discussed in Section 14.XV, Public Services, the project site would be adequately served by public service providers.

The proposed residential use of the site is consistent with Chapter 14 of the Municipal Code, which includes minimum regulations for construction, fire prevention, and use and occupancy of buildings and structures. As discussed in Section 14.VII, *Geology and Soils*, the project would be constructed in accordance with CBC regulations, City Municipal Code, and recommendations included in the project specific geotechnical and soils investigations. As discussed in Sections 14.XV, Public Services, and Section 14.XX, *Wildfire*, the project would be adequately served by fire protection services and built in accordance with California Fire Code regulations, and would not exacerbate fire related hazards. The project would not result in 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 and there would be no impact.

NO IMPACT

14.XII Mineral Resources

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

Environmental Setting

The project site and surrounding properties are located in a developed area of the City. The project site is not known to contain significant aggregate deposits, and the state geologist has not designated any areas in Morro Bay that have mineral resources of statewide or regional significance (DOC 1988, City of Morro Bay 2021a).

Impact Analysis

- a. *Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?*
- b. *Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?*

There are no known mineral resources on the project site or its vicinity and the project does not propose mineral extraction (DOC 1988, City of Morro Bay 2021a). The project would result in no impacts on the availability or recovery of mineral resources.

NO IMPACT

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14.XIII Noise

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

Environmental Setting

Noise and Sensitive Receptors

Noise exposure goals for various types of land uses reflect the varying noise sensitivities associated with those uses. The Plan Morro Bay Noise Element identifies noise-sensitive land uses as residences, schools, hospitals and nursing homes, churches, hotels, playgrounds and parks, offices, and meeting and gathering spaces such as auditoriums, music halls, theaters, and libraries (City of Morro Bay 2021a). The nearest sensitive noise receptors to the project site include residential development immediately north, west, and south of the project site. As shown in Figure NOI-2 of Plan Morro Bay, Chapter 3F - Noise, the primary source of noise in the northern portion of Morro Bay is traffic noise from SR 1 to the west. Based on the existing noise contours shown in Plan Morro Bay, the project site has an existing noise level of approximately 60 decibels on the A-weighted scale (dBA) in terms of Community Noise Equivalent Level (CNEL).⁴

The City's standard for "acceptable" noise exposure is 60 dB for most land uses (City of Morro Bay 2021a). For residential land uses, this threshold is intended to ensure that interior spaces would not be exposed to noise levels that would impact residents.

⁴ dBA is a measurement of noise in decibels using the A-weighted sound pressure level. The A-weighting scale is an adjustment to the actual sound pressure levels to be consistent with that of human hearing response. CNEL is a weighted average of noise level over time, typically 24 hours.

The noise descriptors used for this study are the equivalent noise level (L_{eq}), and CNEL. L_{eq} is one of the most frequently used noise metrics; it considers both duration and sound power level. The L_{eq} is defined as the single steady-state A-weighted sound level equal to the average sound energy over a time period. When no time period is specified, a 1-hour period is assumed. The L_{max} is the highest noise level within the sampling period, and the L_{min} is the lowest noise level within the measuring period. Normal conversational levels are in the 60 to 65 dBA L_{eq} range; ambient noise levels greater than 65 dBA L_{eq} can interrupt conversations (Federal Transit Administration 2018).

Vibration

Groundborne vibration consists of oscillatory waves that move from a source through the ground to adjacent buildings or structures. The primary concern from vibration is that it may cause structural damage. Typically, ground-borne vibration generated by manmade activities attenuates rapidly as distance from the source of the vibration increases. For the purposes of this analysis, vibration amplitudes are expressed in peak particle velocity (PPV) and described in inches per second (in/sec). PPV is often used as it corresponds to the stresses experienced by buildings.

Vibration sensitive receptors are similar to noise sensitive receptors, including residences and institutional uses such as schools, churches, and hospitals. However, vibration sensitive receptors also include buildings where vibrations may interfere with vibration-sensitive equipment. Vibration sensitive receptors near the site include single-family residences adjacent to the project site to the north, west, and south.

City of Morro Bay Municipal Code

Section 17.28.120 of the Morro Bay Municipal Code establishes noise requirements for the City. In general, the Municipal Code prohibits any business operation with sustained or intermittent noise levels exceeding 70 dBA CNEL within 150 feet of residential uses, hospitals, and other noise-sensitive uses unless noise levels are mitigated in compliance with the Municipal Code. The City reviews new public and private development proposals to determine conformance with the policies of the Noise Element, and requires an acoustical analysis early in the review process so that noise mitigation may be included in project design.

Section 9.28.030 of the Morro Bay Municipal Code regulates noise from construction and building repair activities. This section prohibits “erection (including excavating), demolition, alteration or repair of any building or general land grading and contour activity using equipment in such a manner as to be plainly audible at a distance of fifty feet from the building” between 7:00 p.m. and 7:00 a.m. on weekdays, and between 7:00 p.m. and 8:00 a.m. on weekends.

Impact Analysis

- a. *Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

Construction Noise

Construction of the project would result in a temporary increase in ambient noise levels from onsite ground-disturbing activities, the use of construction equipment on the project site, and construction vehicles, including soil hauling trucks, traveling on area roadways. The City has not adopted daytime and nighttime construction noise limits; however, the Federal Transit Administration provides

reasonable criteria for assessing construction noise impacts based on the potential for adverse community reaction in their *Transit and Noise Vibration Impact Assessment Manual* (FTA 2018). The construction noise limits used in this analysis represent what would be reasonably considered a substantial noise level increase as compared to ambient noise levels. These noise limits are tailored to specific land uses; for example, the noise limits for residential land uses are lower than those for commercial land uses, because ambient noise levels in residential areas are typically lower than ambient noise levels in commercial areas. For affected residential uses, the daytime noise threshold is 80 dBA L_{eq}^5 for an 8-hour period. As a result, an increase in ambient noise levels that exceeds these limits would also be considered a substantial increase above ambient noise levels.

Construction noise was estimated using the Federal Highway Administration (FHWA) Roadway Construction Noise Model (RCNM) (FHWA 2006). RCNM predicts construction related equipment noise levels for a variety of construction and demolition operations based on empirical data and the application of acoustical propagation formulas. Using RCNM, construction noise levels were estimated at noise sensitive receivers near the project site. RCNM provides reference noise levels for standard construction equipment, with an attenuation of 6 dBA per doubling of distance for stationary equipment.

Construction activity on the project site would result in temporary noise in the project vicinity, including nearby sensitive receivers. Project construction would involve demolition, site preparation, grading, utility installation, residence construction, and architectural coating. Construction noise would typically be higher during the heavier periods of initial construction, such as site preparation and grading, and would be lower during the later construction phases. Typical construction projects have long-term noise averages which are lower than louder short-term noise events due to equipment moving from one point to another on the site, work breaks, and idle time. Because construction equipment move around a construction site during the workday, noise levels are calculated from the center of the project site to receptors. The nearest sensitive receptors to the project site are residences approximately 300 feet west and 300 feet southwest from the center of the site.

Table 8 summarizes the estimated maximum construction noise levels for each construction phase at a distance of 300 feet from the center of the project site. Complete RCNM modeling worksheets are included in Appendix D.

⁵ Leq refers to the equivalent continuous sound level, which is the constant noise level that would result in the same total sound energy being produced over a given period.

Table 8 Maximum Estimated On-Site Construction Noise Levels

Construction Phase	Maximum Estimated Noise Level (dBA, Lmax)	Maximum Estimated Noise Level (dBA, Leq) ²	Significance Threshold (dBA Leq)	Threshold Exceeded?
Demolition	69.4	70.5	80	No
Site Preparation	69.4	73.4	80	No
Grading	69.4	72.5	80	No
Utility Installati	69.4	70.7	80	No
Residence Construction	74.4	73.2	80	No
Architectural Coating	64.4	60.5	80	No

1 Lmax refers to the highest sound level measured during a single noise event in which the sound level changes with time (e.g., a vehicle passing by).

2 Leq refers to the equivalent continuous sound level, which is the constant noise level that would result in the same total sound energy being produced over a given period.

Source: Appendix D

As shown in Table 8, estimated on-site construction noise levels would not exceed the FTA daytime noise threshold of 80 dBA Leq during any construction phase.

As described in Section 14.XVII, *Transportation*, during grading activities 33 round trips per day would be required to haul soil to the project site. Haul truck noise during grading activities would be temporary, lasting approximately 43 days. The City would require the applicant to implement a Construction Management Plan as a Condition of Approval, which would minimize excessive haul truck noise. The City would require the Construction Management Plan to specify haul routes during grading activities. The Construction Management Plan would require haul routes to be distributed among local roadways, minimizing the duration of increased traffic from haul trucks on any individual local residential street. The Construction Management Plan would also specify coordination for material hauling and deliveries to reduce the potential of trucks traveling within the neighborhood simultaneously to unload at the project site for protracted periods of time, which would also reduce the amount of noise from haul trucks during grading. Haul trucks would be subject to California Code of Regulations Title 13 Section 2485, which prohibit diesel-fueled commercial motor vehicles from idling for more than five minutes, which would minimize unnecessary haul truck noise on the project site. Therefore, construction equipment would not result in a substantial increase above ambient noise levels, and construction noise impacts would be less than significant.

Operational Noise

The project would generate operational noise that would be typical of residential uses, including noise from new vehicle traffic on area roadways and solid waste collection and recycling operations. Noises produced by the project would be similar in character to the existing noise environment associated with surrounding residential uses. Therefore, this discussion focuses on roadway noise that would be generated by the project.

ROADWAY NOISE

The project would generate new vehicle trips with the potential to increase traffic noise levels on nearby roadways. According to CalEEMod modeling (Appendix A), the project would result in approximately 429 daily trips to and from the project site.

Decibels are measured on a logarithmic scale that quantifies sound intensity in a manner similar to the Richter scale used for earthquake magnitudes. A doubling of the energy of a noise source, such as a doubling of traffic volume, would increase the noise level by 3 dB (FTA 2018). The average healthy ear can barely perceive an increase of up to 3 dBA, whereas a change of 5 dBA is readily perceptible (FTA 2018). Based on this information, off-site traffic noise impacts would be significant if project-related traffic would result in a doubling of area traffic volumes. The project site is approximately 0.2-mile northeast of the SR 1 and Yerba Buena Street intersection, which has an average daily traffic count of 31,200 vehicles and generates substantial traffic noise compared to the proposed project’s 429 daily trips (Caltrans 2023). Yerba Buena Street serves as a connection to SR 1 which allows residential traffic surrounding the project site to enter and exit SR 1. Main Street runs parallel and adjacent to SR 1 and provides another option for residential traffic to travel in and out of project area. Similar to existing residential traffic, the proposed project’s residential traffic would be distributed throughout multiple residential streets in the neighborhood rather than centered on a single road, prior to connecting with Yerba Buena Street and SR 1, and therefore would not concentrate substantial traffic noise on a specific residential road. The additional trips generated by the project would not be reasonably anticipated to double the traffic volumes on any individual roadway because there are approximately 265 residential buildings on neighboring roads (i.e., Panorama Drive, Tahiti Street, Whidbey Way, Whidbey Street, Yerba Buena Street, Zanzibar Street, Tide Avenue, etc.) to the project site, as well as several other residences outside of the immediate vicinity of the project site which would utilize the same roads as residents of the proposed project. The proposed project’s 46 units would not double the number of residential units in the area. Therefore, the proposed project’s residential traffic would have a less than significant impact related to operational roadway noise.

Overall, construction or operation of the project would not result in a substantial temporary or permanent increases in ambient noise levels that would exceed standards established by the FTA or City. This impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

b. Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

High levels of groundborne vibration may cause damage to nearby building or structures; at lower levels, groundborne vibration may cause minor cosmetic damage (i.e., non-structural damage) such as cracks. These vibration levels are nearly exclusively associated with high impact activities such as blasting, pile-driving, vibratory compaction, demolition, drilling, or excavation. The American Association of State Highway and Transportation Officials (AASHTO) has determined vibration levels with potential to damage nearby buildings and structures; these levels are identified in Table 9.

Table 9 AASHTO Maximum Vibration Levels for Preventing Damage

Type of Situation	Limiting Velocity (in/sec)
Historic sites or other critical locations	0.1
Residential buildings, plastered walls	0.2–0.3
Residential buildings in good repair with gypsum board walls	0.4–0.5
Engineered structures, without plaster	1.0–1.5

Source: Caltrans 2020

Operation of the proposed project would not include sources of vibration; therefore, the project's potential to generate excessive groundborne vibration is evaluated based on project construction. Construction activities would be limited to 7:00 a.m. to 7:00 p.m. on weekdays and 8:00 a.m. to 7:00 p.m. on weekends and therefore would not result in nighttime vibration. Neither blasting nor pile driving would be required for construction of the project. Therefore, the greatest vibratory source during construction would be an excavator. Construction vibration estimates are based on vibration levels reported by Caltrans and the FTA (Caltrans 2020; FTA 2018) for a large dozer, which is used as a proxy for an excavator due to the similarity in the equipment. An excavator may be used as close as 100 feet away from existing residences along Panorama Drive. A large dozer would create approximately 0.089 in./sec. PPV at 25 feet (Caltrans 2020). This would equal a vibration level of 0.02 in./sec. PPV at a distance of 100 feet (Caltrans 2020; FTA 2018). This would be lower than the structural damage impact threshold to residential structures of 0.4 in/sec PPV. Therefore, temporary vibration impacts associated with an excavator (and other potential equipment) would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- c. *For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?*

The project site is not located within an airport land use plan, or within two miles of a public or private airport. The closest airport is the San Luis Obispo County Regional Airport, which is approximately 17 miles southeast of the project site. The project site is not within the identified noise contours of any airport (San Luis Obispo County 2021). Therefore, the project would result in no impact related to exposure of future residents to aircraft noise.

NO IMPACT

14.XIV Population and Housing

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

Environmental Setting

The project site is vacant and surrounded by residential development to the north, west, and south. As of January 2024, Morro Bay had a population of 10,261 and contained 6,580 housing units, with an average of 1.99 persons per household (California Department of Finance 2024). The SLOCOG Regional Growth Forecast 2010-2050 presents forecasts of population and employment between 2010 and 2050 for the County of San Luis Obispo, including the City of Morro Bay. SLOCOG forecasts that the city would have a population of 12,261 residents and 7,433 housing units by 2050 (SLOCOG 2017).

Impact Analysis

- a. *Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?*
- b. *Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?*

The project would involve construction of 46 single family residences. Using the existing average number of persons per household in the city, and conservatively assuming that all future project residents would relocate to Morro Bay from outside the city, the project could lead to a population increase of approximately 92 people (DOF 2024).⁶ Based on a 2024 population of 10,261 persons, a 92 resident increase would result in a total population of 10,353 persons, a 0.9 percent increase, which would not exceed the regional forecast. The project site does not contain existing residences and would not result in the displacement of housing units or people. The project would not induce substantial unplanned population growth or displace existing people or housing, and impacts would be less than significant.

⁶ 46 residences multiplied by an average of 1.99 persons per residence is approximately 92 people.

LESS THAN SIGNIFICANT IMPACT

14.XV Public Services

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

Environmental Setting

Fire and Police Services

The MBFD maintains two stations at 715 Harbor Street (fully staffed) and 460 Bonita Street (not staffed) (MBFD 2022a). The average response time for the Department north of SR 41 is approximately five minutes. The MBFD operates and manages two fire engines, one quint, one rescue truck, one command vehicle, two utility vehicles, and a mass casualty vehicle. The MBFD also operates an engine provided the California State Office of Emergency Services (MBFD 2022b). The MBFD maintains a goal of responding to 90 percent of calls within five minutes (MBFD 2004). The Morro Bay Police Department provide police protective services, via the station located at 850 Morro Bay Boulevard.

Public Schools

The City is served by the San Luis Coastal Unified School District (SLCUSD). Two SLCUSD schools are located in Morro Bay: Morro Bay High School, located at 235 Atascadero Road; and Del Mar Elementary, located at 501 Sequoia Street. In the 2023-2024 school year, Morro Bay High School had 773 students and Del Mar Elementary had 266 students (California Department of Education 2024a; 2024b).

Parks

The City manages numerous parks including Morro Rock Beach, Monte Young Park, Del Mar Park, Anchor Street Park, Keiser Park, Morro Bay City Park, Centennial Park, Coleman Park, Bayshore Bluffs, Tideland Park, North Point, and Cloisters Park. In addition, Morro Bay is home to Morro Strand State Beach and Morro Bay State Park, which are managed by the California Department of Parks and Recreation, and a state marine recreational management area. Together, these recreational resources total over 5,000 acres of recreation and open space area, including 10 miles of ocean and bay front shoreline (City of Morro Bay 2017). Approximately 95 percent of City's shoreline has public lateral access, which provides active recreational opportunities for residents.

Libraries

The City is served by the Morro Bay Library branch of the County of San Luis Obispo Public Libraries system. The Morro Bay Library is approximately 7,000 square feet and offers reading and book discussion programs, a book sales area, and an enclosed patio in addition to the materials in its circulation system (County of San Luis Obispo Public Libraries 2022).

Impact Analysis

a.1. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, or the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

The70ublic70t would introduce 46 new residential units that would be served by the MBFD. The project site is surrounded by existing development that is served by existing City fire protection services. As discussed in Section 14.XIV, Population and Housing, the project would result in a 0.9 percent increase to the City's population, which would be within regional growth forecasts. Anticipated growth from the residential project would not substantially increase demand for fire services or result in any change to fire response or performance objectives. Future construction and operation of residences on site would be required to comply with applicable building and fire codes, including the California Building Code and the California Fire Code adopted pursuant to Section 14.01.020 of Morro Bay Municipal Code. No new construction or physical alterations of fire protection facilities would be required. Additionally, the project applicant would be required to pay community development fees, which would provide funding to offset potential increases in the use of fire facilities. This impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

a.2. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, or the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

The70ublic70t site is surrounded by existing development that is served by existing police protection services. As discussed in Section 14.XIV, *Population and Housing*, the project would result in a nominal 0.9 percent increase to the City's population, within regional growth forecasts. Anticipated growth from the residential project would not substantially increase demand for police

enforcement services from the Morro Bay Police Department. No new construction or physical alterations of police protection facilities would be required. Additionally, the project applicant would be required to pay community development fees, which would provide funding to offset potential increases in the use of police protection facilities. This impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

a.3. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered schools, or the need for new or physically altered schools, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?

Based on California Department of Education enrollment data, total enrollment at Morro Bay High School and Del Mar Elementary Schools was 1,039 students in 2023-2024. SLCUSD uses student generation rates to estimate the number of new students generated by new housing development. For single family detached residences, the SLCUSD Facility Master Plan uses a student generation rate of 0.338 per residence (SLCUSD 2022); therefore, the proposed 46 new single-family residences would generate approximately 16 students, which represents a 1.4 percent increase in the student population of SLCUSD schools in Morro Bay.⁷ The 2023-2024 enrollments of Del Mar Elementary and Morro Bay High School have decreased by approximately by 16 percent and 10 percent, respectively, since the 2020-2021 school year (California Department of Education 2024a; 2024b). SLCUSD schools are currently operating below capacity and are anticipated to operate below capacity through the year 2029 (SLCUSD 2022). The potential 1.4 percent increase in students would not cause either school to exceed capacity.

The project applicant would be required to pay school impact fees to SLCUSD. Pursuant to Section 65995(3)(h) of the California Government Code (Senate Bill 50, chaptered August 27, 1998), school impact fees are “deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization.” Therefore, the project would not require new or expanded school facilities and would not result in new physical impacts associated with school facility expansion or new school facility construction. This impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

a.4. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered parks, or the need for new or physically altered parks, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?

a.5. Would the project result in substantial adverse physical impacts associated with the provision of other new or physically altered public facilities, or the need for other new or physically altered public facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

⁷ 46 residences multiplied by 0.338 students per residence is approximately 16 students. The percent increase from 1,164 from to 1,180 is 1.37 percent.

Panorama Drive Subdivision Project

As described in Section 14.XIV, *Population and Housing*, the project has the potential to result in approximately 92 new residents to the City, which would incrementally increase the use of nearby City parks, libraries, and other public facilities. The potential increase in population is within the SLOCOG population projections and would not be expected to result in a substantial increase in the use of parks, libraries, and other facilities. According to Plan Morro Bay, the City owns and operates approximately 33 acres of accessible open space and parkland, providing an existing park service ratio of 3.1 acres per 1,000 residents (based on the 2016 baseline year population of 10,714 persons established in Plan Morro Bay). The addition of 92 new residents would not substantially alter the existing service ratio of 3.1 acres per 1,000 residents. The project would include approximately 2.9 acres of open space with a paved pedestrian trail system that would serve project site residents and the public. The project would not substantially increase the use of public facilities, libraries, or parks such that new facilities would be required. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

14.XVI Recreation

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

Environmental Setting

The City of Morro Bay manages 33 acres of park space. Additionally, Morro Bay is home to Morro Strand State Beach and Morro Bay State Park, which are managed by the California Department of Parks and Recreation, as well as a state marine recreational management area. Together, these recreational resources total over 5,000 acres of recreation and open space area. In addition to parks, Morro Bay maintains numerous City-owned recreational facilities, including basketball courts, tennis courts, and baseball fields (City of Morro Bay 2017).

Impact Analysis

- a. *Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?*
- b. *Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?*

As described in Section 14.XIV, *Population and Housing*, the project would add up to 98 residents to the City, which would incrementally increase use of nearby recreational facilities. The project would include approximately 2.8 acres of onsite open space that would offset some use of nearby recreational facilities. According to Plan Morro Bay, the City owns and operates approximately 33 acres of accessible open space and parkland, providing an existing park service ratio of 3.1 acres per 1,000 residents (based on the 2016 baseline year population of 10,714 persons established in Plan Morro Bay). The addition of 92 new residents would not substantially alter the existing service ratio of 3.1 acres per 1,000 residents; however, the additional population generated by the project would not substantially increase the use of recreational facilities such that substantial physical deterioration of facilities would occur or be accelerated. The project, including the proposed 2.9 acres of open space and paved pedestrian trails, is analyzed throughout this Initial Study (with potential impacts to Biological Resources, Cultural Resources, Hazards and Hazardous Materials, and

Panorama Drive Subdivision Project

Tribal Cultural Resources anticipated to be further studied in an EIR). However, no adverse physical effects would be associated with construction of the open space and pedestrian trail system. Therefore, these impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

14.XVII Transportation

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

The transportation analysis provided herein is based on a Transportation Impact Study (TIS) completed by Central Coast Transportation Consulting for the project in August 2023. The TIS is included as Appendix E.

Environmental Setting

Panorama Drive is a two-lane residential road off-street parking. There are no existing or proposed bikeways on Panorama Drive. Currently, there is one driveway on Panorama Drive across from Tahiti Street, which provides access to the project site.

Impact Analysis

- a. *Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?*

Construction

Construction of the project would generate traffic for deliveries of equipment and materials to the project site and vehicle trips to transport construction workers. For the purposes of this analysis, it is assumed construction worker vehicles and construction equipment would access the project site via Yerba Buena Street and Panorama Drive. Construction worker trips were estimated based on default values provided by CalEEMod (see Appendix A). The project would generate a maximum of 25 construction worker trips per day and would require approximately 33 round trips per day during grading activities to import soil to the project site. Construction of the project would not involve any vehicle or equipment staging on Yerba Buena Street, Panorama Drive, or other surrounding

roadways. Temporary lane closures on Panorama Drive may be required during construction of the project site access road; however, impacts to the road would be short-term. Construction worker and hauling traffic may result in increased traffic in the vicinity of the project site but, these impacts would be short-term and temporary and limited to the construction period. Furthermore, as a Condition of Approval of the proposed project, the City would require the construction contractor to implement a Construction Management Plan, which would specify routes for haul trucks during grading activities. The required Construction Management Plan would ensure haul routes are distributed among local roadways, such that the duration of increased traffic from haul trucks on any individual residential street is minimized. With implementation of the required Construction Management Plan, construction transportation impacts would be less than significant.

Operation

VEHICULAR ACCESS

Project access would be provided via two driveways on Panorama Drive, one located at the existing driveway and the other near the intersection of Panorama Drive and Trinidad Street in the southern portion of the project site. Each driveway would provide both entrance and exit lanes for site accessibility. The project would involve construction of a sidewalk on the project site frontage along Panorama Drive, which would not redirect or otherwise affect vehicular access on Panorama Drive. The proposed driveways would be situated on the site in manner that would support vehicle flow on the project site and in the neighborhood vicinity. Operation of the project would not generate traffic that would conflict with applicable programs, plans, ordinances, or policies addressing the circulation system. Impacts would be less than significant.

BICYCLE ACCESS

There are no existing bicycle lanes in the immediate vicinity of the project site. The closest roadway with bicycle lanes is Main Street, approximately 0.2 mile south of the project site. Because construction activities are expected to be staged within the project site, neither project construction nor the completed project are expected to affect bicycle lanes on Main Street. Impacts to bicycle access would be less than significant.

PEDESTRIAN ACCESS

There is currently not a sidewalk along the project site's frontage with Panorama Drive, and there are no sidewalks on the residential roadways immediately surrounding the project site. The project includes sidewalks along Panorama Drive and along the proposed roadways within the project site. The project would also include construction of a paved pedestrian trail through the open space located in the southeastern portion of the project site connecting residences at the end of Private Road B to the project site's frontage along Panorama Drive (refer to Figure 3) which would provide pedestrian access throughout the project site. Therefore, the project would have a less than significant impact related to conflicts with the pedestrian system.

CIRCULATION ELEMENT CONSISTENCY

Plan Morro Bay outlines transportation goals and policies, and the primary goal of the Plan Morro Bay Circulation Element is "to create a regionally connected system that facilitates safe and convenient travel for all community members, regardless of travel mode, age, or physical ability" (City of Morro Bay 2021a). The project would align with this goal by enhancing the pedestrian

environment along Panorama Drive through the provision of sidewalks along the project site. Furthermore, as discussed above, construction and operation of the project would not involve changes to the local roadway, pedestrian, bicycle, or public transportation environment that could impede circulation or conflict with Plan Morro Bay. Therefore, impacts would be less than significant.

- b. *Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?*

CEQA Guidelines Section 15064.3 establishes thresholds for Vehicle Miles Traveled (VMT), a metric used to calculate the total annual miles of vehicle travel in a defined area. The City of Morro Bay has not yet adopted a standard of significance for evaluating VMT; therefore, guidance provided by the Governor's Office of Planning and Research's (OPR) in the publication *Transportation Impacts (SB 743) CEQA Guidelines Update and Technical Advisory (2018)* is used in this analysis. According to OPR's guidance, a project would have a less than significant impact if project-generated VMT does not exceed a level of 15 percent below existing regional VMT per capita.

The SLOCOG Regional Travel Demand Model was used to estimate project-generated VMT (Appendix E). The existing regional average for the project area is 13.4 residential VMT per capita; therefore, the corresponding significance threshold is 11.39 VMT per capita, 15 percent less than 13.4 VMT per capita (Appendix E).

The project site is located within a larger Traffic Analysis Zone (TAZ) defined by the SLOCOG Regional Travel Demand Model. The TAZ includes the area generally bounded by SR 1, Zanzibar Street, Panorama Drive, and Island Street. Residential land uses within this TAZ generate 10.91 VMT per capita and the project would be expected to generate a similar VMT per capita (Appendix E). The 10.91 VMT per capita is below the significance threshold of 11.39 VMT per capita. Therefore, project impacts to VMT would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- c. *Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?*
- d. *Would the project result in inadequate emergency access?*

Vehicular and pedestrian access to the project site would be provided via two driveways from Panorama Drive. Both driveways would be full access and controlled with stop signs facing egress traffic. The project does not include any new public roadways or other public infrastructure. Therefore, the project would not result in roadway hazards on or in the vicinity of the site. Project site design, including property ingress and egress, would be required to provide safe, adequate, and usable site access to pedestrians and vehicles as required by Morro Bay Municipal Code Section 17.27.110. The project would not substantially increase hazards due to geometric design features or incompatible use and would not result in inadequate emergency access. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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14.XVIII Tribal Cultural Resources

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

Impact Analysis

- a. *Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074 that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?*
- b. *Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074 that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1?*

Many important cultural resources, such as tribal cultural resources, do not leave an archaeological footprint or have physically identifiable manifestations. Therefore, it is vital to evaluate possibility of

these important resources and their locations through consultation with local tribal members. Speaking to tribal members is often the only way to obtain information about these important resources. Due to the historic and archaeological nature of the area the project site and vicinity encompasses, the potential for important cultural resources to exist is required to be considered through the consultation process outlined by AB 52.

The City of Morro Bay sent AB 52 consultation letters to local tribes in the region on December 8, 2022. Response letters were received from the Northern Chumash Tribal Council, the yak tityu tityu yak tihini Northern Chumash Tribe, Santa Ynez Band of Chumash Indians, the Xolon Salinan Tribe, The City is currently undergoing consultation efforts in accordance with AB 52. Accordingly, potential impacts to tribal cultural resources associated with Checklist Items 18a and 18b will be further studied in an EIR.

POTENTIALLY SIGNIFICANT IMPACT

14.XIX Utilities and Service Systems

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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Would the project:

a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Environmental Setting

Water

The Morro Bay Public Works Water Division provides water service for the City and would provide water service to the project. The City receives the majority of its water supply from the State Water Project (SWP), which is purchased by San Luis Obispo County, and from local groundwater. Two local groundwater basins, Morro Basin and Chorro Basin, provide the majority of groundwater for the City. The City operates seven drinking water wells in the Morro Groundwater Basin, four of which are active, and eight wells in the Chorro Groundwater Basin, with only one being active due

to high nitrate levels. Additionally, a desalination plant supplements the City’s water supply in drought conditions (City of Morro Bay 2021b).

The City’s 2020 UWMP provides water supply and demand estimates for the next 25 years based on existing land uses. Table 10 summarizes projected water supply and demand across normal, single dry, and multiple dry years through 2045, in terms of acre-feet per year (AFY).

Table 10 City of Morro Bay Projected Water Supply and Demand

	Year				
	2025	2030	2035	2040	2045
Normal Year					
Supply Totals	3,151	3,151	3,151	3,151	3,151
Demand Totals	1,333	1,366	1,400	1,445	1,445
Difference	1,818	1,785	1,751	1,706	1,706
Single Dry Year					
Supply Totals	1,702	1,702	1,702	1,702	1,702
Demand Totals	1,333	1,366	1,400	1,445	1,445
Difference	369	336	302	257	257
Multiple Dry Years					
First Year					
Supply Totals	3,151	3,151	3,151	3,151	3,151
Demand Totals	1,333	1,366	1,400	1,445	1,445
Difference	1,818	1,785	1,751	1,706	1,706
Second Year					
Supply Totals	2,967	2,967	2,967	2,967	2,967
Demand Totals	1,333	1,366	1,400	1,445	1,445
Difference	1,634	1,601	1,567	1,522	1,522
Third Year					
Supply Totals	1,702	1,702	1,702	1,702	1,702
Demand Totals	1,333	1,366	1,400	1,445	1,445
Difference	369	336	302	257	257

Notes: water volumes shown in AFY

Source: City of Morro Bay 2021b

Stormwater/Wastewater

The project site is currently vacant and there are no stormwater/wastewater drainage systems onsite. Wastewater in the City is currently treated at the Morro Bay – Cayucos Wastewater Treatment Plant (WWTP), which is owned and operated through a Joint Powers Agreement by the City of Morro Bay and the Cayucos Sanitary District. Between 2013 and 2017, the WWTP had a 5-year average flow of 0.94 million gallons per day (mgd) (City of Morro Bay 2017). However, the WWTP is nearing capacity, and after plans to expand the WWTP became infeasible, the City planned to construct a new Water Reclamation Facility (WRF). The WRF is designed to have a capacity of 1 mgd and would receive, store, and treat the full influent wastewater flows from the City in

accordance with the effluent requirements of the NPDES permit program (City of Morro Bay 2020). The WRF construction and conveyance facilities are complete and all components are expected to be completed by early 2025 (Morro Bay 2023).

Electricity, Natural Gas, and Telecommunications

PG&E maintains the electricity distribution lines, natural gas lines, and substations that serve the project area, and electricity is provided by Central Coast Community Energy (3CE). Telecommunication and internet service providers are available in the area, such as Cox Communications.

Solid Waste

Chapter 8.16 – Solid Waste Management of the City’s Municipal Code outlines solid waste collection services and requirements in the City. Solid waste collected in Morro Bay is disposed of at the Cold Canyon Landfill, which has a permitted throughput of 1,650 tons per day, a permitted capacity of approximately 24 million cubic yards, and an anticipated 20 years of remaining life (CalRecycle 2019). The City contracts with Morro Bay Garbage, which serves the San Luis Obispo County Integrated Waste Management Authority jurisdictional area (City of Morro Bay 2017).

Impact Analysis

- a. *Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?*
- b. *Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?*
- c. *Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?*

Water

The City’s 2020 UWMP provides water supply and demand estimates for the next 25 years based on existing land uses and Table 10 summarizes projected water supply and demand across normal, single dry, and multiple dry years through 2045. The City’s water supply is projected to remain relatively constant from 2025 to 2045 in each scenario, and the City is expected to have an available water supply in excess of projected demands through 2045 (City of Morro Bay 2021b).

The proposed residential development is consistent with the land use designation and zoning for the project site. As a result, the anticipated growth associated with development of the site is accounted for in the UWMP. Therefore, existing water entitlements and resources would be sufficient to serve the project, and the project would not result in the need for new water entitlements or resources. The project would not require new or expanded water facilities, and would have sufficient water supplies available in normal, dry, and multiple dry years. Impacts would be less than significant.

Stormwater/Wastewater

The project would implement Tier 4 Stormwater Control Measures to ensure that all post-development stormwater runoff generated from new impervious surfaces is directed and retained in the on-site bioretention basin, ensuring post-development flows do not exceed pre-development conditions (Appendix C). The project would connect to the City's existing sewer network and would be served by the City's planned wastewater conveyance and treatment infrastructure. The project would result in an increase in wastewater demand, which would be served by the WRF. Assuming wastewater is 80 percent of operational indoor water use, the project would generate an estimated 1.1 million gallons of wastewater per year, equivalent to approximately 3,047 gallons per day (Appendix A). This volume of wastewater would represent approximately 0.3 percent of the WRF's planned capacity of 1 mgd. Therefore, the project would not result in the need for new or expanded stormwater or wastewater facilities. Impacts would be less than significant.

Electricity, Natural Gas, and Telecommunications

The project site is located in an area currently served by electricity and natural gas infrastructure. Project development would tie into existing natural gas and electric infrastructure within Panorama Drive that currently serve surrounding residential development. Telecommunications are generally available in the project area and facility upgrades would not be necessary. The energy demand generated by the project would represent a negligible increase in demand currently served by PG&E and 3CE. Therefore, new or expanded electricity and natural gas facilities would not be required beyond those included in the project, and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- d. *Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?*
- e. *Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?*

Construction of the project would generate solid waste, including construction debris. However, construction would not generate waste that would exceed the landfill capacity or substantially affect the anticipated closure date of the landfill.

California Department of Recycling states the most recent disposal rate per resident is approximately 6.7 pounds per person per day (CalRecycle 2019). As described in Section 14.XIV, *Population and Housing*, the project is anticipated to add up to 92 new residents to the City, which would result in a projected increase of 616 pounds of waste per day, or less than 0.1 percent of Cold Canyon landfill's daily permitted throughput of 1,650 tons (3,300,000 pounds) per day. Long-term disposal needs associated with the project would not exceed the capacity of local facilities. In addition, the project would be required to comply with applicable federal, state, and local regulations regarding solid waste and waste diversion.

LESS THAN SIGNIFICANT IMPACT

14.XX Wildfire

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

Environmental Setting

The project site is not located within a SRA or within a Fire Hazard Severity Zone (FHSZ) as designated by the California Department of Forestry and Fire Protection (CAL FIRE 2007). The nearest Very High FHSZ within an SRA and within a Local Responsibility Area is located approximately four miles southeast of the project site, east of Morro Bay State Park. The areas immediately north, east, and southeast of the project site are designated as a Moderate FHSZ within a SRA.

Impact Analysis

- a. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?*

The project site is adjacent to a SRA designated as a Moderate FHSZ. The City of Morro Bay Annex of San Luis Obispo County's Multi-Jurisdictional Hazard Mitigation Plan identifies wildfire hazards in Morro Bay as high, and identifies SR 1 as a major emergency evacuation route in the City (San Luis Obispo County 2019). Additionally, the City of Morro Bay's Multi-Hazard Emergency Response Plan outlines policies and concepts for responding to wildfire, in addition to other hazards, and describes the MBFD's role in organizing emergency response and evacuation activities (City of Morro Bay 2008). The project site is located 0.2 mile north of SR 1, the nearest major evacuation route. Residential development would not interfere with access to SR 1 and would not substantially impair the MBFD's ability to implement adopted emergency response plans or evacuation plans. This impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- b. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?*

The undeveloped areas immediately north, east, and southeast of the project site are designated as a Moderate FHSZ within a SRA. According to guidance provided by CAL FIRE, sloping land increases susceptibility to wildfire because fire typically burns faster up steep slopes (CAL FIRE 2000). The project site and surrounding undeveloped areas are sloped, with the areas sloping upward to the northeast and southeast. In the event of a wildfire, fire would burn faster upslope away from the project site (to the east) and existing development. Additionally, the predominant prevailing wind direction in Morro Bay is from west to east, away from the project site and existing development (WeatherSpark 2022).

The project would involve the use of construction equipment, which may produce sparks that could ignite vegetation. Project construction would be required to comply with regulations related to construction equipment and fire suppressants, including but not limited to California Public Resources Code Section 4442, which requires spark arrestors on potentially-spark inducing equipment.

The project would not exacerbate existing wildfire risk and would not substantially increase the risk of exposing project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- c. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?*

The project would involve the construction of new roadways and utility connections on the project site. However, no extensions would occur beyond the project site into Moderate FHSZs or SRAs. The project would not result in the installation of associated infrastructure that would not exacerbate fire risk or result in temporary or ongoing impacts to the environment, and the project would have no impact.

NO IMPACT

- d. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?*

According to landslide inventory maps prepared by the DOC, the project site partially overlaps a landslide zone along its southern boundary (DOC 2019). The project would not include grading or earthmoving activities within the landslide zone. The southern area of the project site would include open space and pedestrian trails, which would require minimal ground disturbance, and would not contain habitable structures. As discussed in Section 14.VII, Geology and Soils, the project would be conditioned to implement geotechnical recommendations included in the site-specific soils engineering and investigations which would minimize potential landslide and other soil stability hazards, such as subsidence or expansivity. As discussed in Section 14.X, *Hydrology and Water Quality*, the project would not substantially alter drainage patterns in the site in a way that would result in significant impacts related to flooding and runoff. The project would not exacerbate existing risk of runoff, post-fire slope instability, or drainage changes, and this impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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14.XXI Mandatory Findings of Significance

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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Does the project:

- | | | | | |
|---|---|---|---|---|
| a. Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? | ■ | □ | □ | □ |
| b. Have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)? | ■ | □ | □ | □ |
| c. Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? | ■ | □ | □ | □ |

a. *Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?*

As discussed in Section 14.IV, Biological Resources, Section 14.V, Cultural Resources, and Section 14.XVIII, *Tribal Cultural Resources*, construction of the project has the potential to significantly impact biological resources, cultural resources, and tribal cultural resources. These issues will be further studied in an EIR.

POTENTIALLY SIGNIFICANT IMPACT

- b. *Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?*

Cumulatively considerable impacts could occur if the construction or operation of other projects coincide with the project, such that similar impacts of multiple projects combine to expose a resource to greater levels of impacts than what would occur with the project alone. The project would have no impact on agriculture and forestry resources, riparian or wetland habitat, energy, land use and planning, mineral resources, airport hazards, displacement, or wildfire. Thus, the project would not contribute to cumulative impacts to these resource topics. In addition, certain resource areas (e.g., geology and soils, hazards and hazardous materials) are by their nature specific to a project location such that impacts at one location do not add to impacts at other locations, and therefore would not result in cumulative impacts.

Cumulative development in the City would comply with the City’s Municipal Code and Plan Morro Bay policies which would minimize cumulative impacts to aesthetics and land use. Similarly, cumulative development would comply with the NPDES Construction General Permit and City stormwater control requirements, which would minimize cumulative impacts to hydrology and water quality. While cumulative development could result in substantial population increases which could result in increased cumulative demand for public services and recreation, the project would not result in population growth which would exceed regional population forecasts or necessitate additional public service or recreational facilities. Therefore, the project’s contribution to cumulative impacts to population, public services, and recreation would not be cumulatively considerable. Cumulative development could result in a greater number of vehicle trips compared to existing conditions and an increase in VMT. As discussed in Section 14.XVII, *Transportation*, the project would not generate a net increase in VMT; therefore, the project’s contribution to transportation and circulation impacts would not be cumulatively considerable.

Cumulative development would result in increased water demand, increased wastewater generation, and increased solid waste generation. The City’s UWMP anticipates being able to accommodate the project’s anticipated water demand; similarly, existing facilities would be able to accommodate the project’s anticipated wastewater and solid waste generation. Therefore, the project would not considerably contribute to cumulative water demand, wastewater generation, or solid waste generation.

Criteria air pollutant and GHG emissions are cumulative in nature, as incremental contributions of GHG emissions from individual projects contribute to the cumulative total GHG emission in the atmosphere. The project would not exceed SLOAPCD emission thresholds, ensuring the project would not have a considerable contribution to cumulative impacts related to GHG emissions. The project would not have a cumulatively considerable contribution to cumulative construction air quality or noise impacts.

As discussed in this Initial Study in Sections 14.IV, *Biological Resources*, and Section 14.V, *Cultural Resources*, the proposed project has potentially significant impacts related to biological resources and cultural resources. The potential cumulative biological and cultural impacts will be studied in an EIR.

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- c. *Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?*

In general, impacts to human beings are associated with air quality, geologic hazards, contamination/hazards and hazardous materials, noise, and wildfire. As discussed in Section 14.III, Air Quality, Section 14.VII, Geology and Soils, Section 14.XIII, Noise, and Section 14.XX, Wildfire, impacts related to these issue areas would be less than significant. As discussed in Section 14.IX, *Hazards and Hazardous Materials*, the project's potential to expose construction workers or future residents to existing contaminated soils onsite will be studied further in an EIR to determine whether the project would result, either directly or indirectly, in adverse hazards on human beings.

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