Acacia Commons Project proposal EIA

Cal Poly CRP Department

Francisco AlfaroZierten

03/19/21

Cal Poly CRP Department

Francisco AlfaroZierten

03/19/21

CRP 342 – Environmental Planning Methods

Professor Greve

Due to the constraints of a class project, we have not addressed all impact areas or prepared a mitigation monitoring program.

Table of Contents

Section	**Page**
Summary of Impacts and Mitigation Measures	**4**
Introduction	
Background	**8**
Purpose and Legal Authority	**9**
Contents	**10**
Environmental Impact Assessment and Mitigation Measures	
Aesthetics	**18**
Air Quality	**22**
Hydrology/ Water Quality	**28**
Noise	**33**
Recreation	**37**
Utilities	**40**
References	**44**

Summary of Impacts and Mitigation Measures:

AC Impact 1: One important view through the site is the West-facing view from Broad Street. This is an important public view because it is the main street that can access the site. The development would have a substantial adverse effect on the scenic vista viewable from Broad St. and would certainly affect the view in terms of viewshed blocking and light pollution. The main issue however is the creation of substantial light and glare due to the fact that the area has minimal development and would therefore exacerbate any light pollution. However, given the fact that most views from this sight are by car, I cannot say that it would be impactful to the public in a major way. Overall, the threat to this viewshed is not overly significant, and if mitigation measures were put in place, they would not have to be anything more than minor measures.	**AC Mitigation 1-1:** Limit the maximum building height to not exceed 20 feet above the average natural grade of the South Hills Open Space, in a similar fashion to what was recommended in the Southern California International Gateway Draft EIR. **AC Mitigation 1-2:** Plant large trees around the sight so that any views into the sight are mostly foliage and plants instead of a built environment.
AC Impact 2: A second important view onto the sight would be the view from the South Hills Open Space. This view is important because it provides a wide South-Southeast panoramic view that reaches towards the hills separating San Luis Obispo and Pismo. Development would have significant adverse effects on the scenic vista. It would also significantly degrade the existing visual quality of the site. Thirdly, the potential light pollution would have a significant impact on the view, however less so when compared to the view from Broad St., given that when looking at the site from the South Hills Open Space, the site is next to already developed areas. Given that the view from the South Hills Open Space is accessible solely to pedestrians, anyone that goes to the area to observe the view would have their situation affected in a significant way. Overall, the threat to this view is significant and would require some form of mitigation to be enacted.	**AC Mitigation 2-1:** Equip any security lighting installed on the property with motion detectors to prevent the illumination from remaining on in the retail sections during hours of non-operation, as seen in the Southern California International Gateway Draft EIR. **AC Mitigation 2-2:** Limited or no use of reflective coatings on the outside of the buildings in the site, as seen in the Southern California International Gateway Draft EIR. **AC Mitigation 2-3:** All exterior point-source lighting shall be directed downward and fully shielded from off-site views, as recommended in the Southern California International Gateway Draft EIR.

AQ Impact 1: According to the threshold for Ozone Precursors (ROG+NOx), the threshold that should not be surpassed in order to stay at attainment is 25 lbs. per day. However, according to the Winter Mitigated Operational table (Table 4), the total is 17.7034+18.4489 which is 36.1523 lbs. per day. Therefore, making it non-attainment and resulting in further mitigation measures needing to be put in place.	**AQ Mitigation 1-1:** Provide improved public transit amenities (e.g.: covered transit turnouts, direct pedestrian access, bicycle racks, covered bench, smart signage, route information displays, lighting, etc.), as specified in the *APCD 2012 CEQA Handbook*. This would be for any new transit stops on the site, should they be included in the development. **AQ Mitigation 1-2:** Provide and require the use of battery powered or electric landscape maintenance equipment, as specified in the *APCD 2012 CEQA Handbook*.
AQ Impact 2: For the Diesel Particulate Matter (DPM), the threshold that should not be surpassed is 1.25 lbs. per day. According to the Winter Mitigated Operational Table (Table 4), there is a PM2.5 total of 2.1011 lbs. per day. With this being above the 1.25 lb. per day threshold, mitigation measures need to be enacted.	**AQ Mitigation 2-1:** Enforce "No Idling" for vehicles on the property, as specified in the *APCD 2012 CEQA Handbook*. [MOU3] This would specifically apply to delivery trucks operating for any retail within the site. **AQ Mitigation 2-2:** Utilize alternative fuel vehicles during the operational phase of development, as specified in the *APCD 2012 CEQA Handbook*.
AQ Impact 3: For Fugitive Particulate Matter (PM10), the given threshold is 25 tons per year. The Annual Mitigated Operational table (Table 3) shows that the PM10 total is 1.1250 tons per year. Mitigation measures will still have to be implemented because pre-development, the PM10 amount is at non-attainment.	**AQ Mitigation 3-1:** Design and build high density, compact development within the site to encourage alternative transportation (walk, bike, bus, etc.), as specified in the *APCD 2012 CEQA Handbook*. This would specifically be applied to the office and retail spaces on the site. **AQ Mitigation 3-2:** Provide on-site bicycle parking: both short-term racks and long-term lockers, or a locked room with standard racks and access limited to bicyclists only, as specified in the *APCD 2012 CEQA Handbook*. This would be provided by both office and retail, and would be used by employees, residents, and customers.
HWQ Impact 1: When we then compare the area of catchment, we can see that there is an increase of 24.73% in each of the evaluated years when looking at the above data. All of these changes are above 5% and are therefore considered significant and will require mitigation measures to be put in place.	**HWQ Mitigation 1-1:** Implement the use of sandbags, straw bales, and temporary desilting basins during the project construction in order to prevent discharge of sediment-laden runoff into stormwater facilities, as specified in the DDM.

	HWQ Mitigation 1-2: Limit temporary storage of construction equipment to a minimum of 100 feet away from drainages on the project site in the operational phase, as specified in the DDM. **HWQ Mitigation 1-3:** Use vegetated buffer strips so as to reduce sediment and particulate forms of metals and nutrients from entering the drainage system, as specified in the DDM. This would specifically be placed around the project site to reduce articulates entering the drainage system on Broad street.
N Impact 1: Broad St obviously produces noise, however the levels of noise produced from the street are 70db, 65db, and 60db. Noise levels of 60db are not an issue, however the 65 and 70db noises may cause issues. If the site places parking next to Broad St, then commercial/retail and the residential areas are less likely to be affected by noise, meaning that mitigation should not be needed. Because of this, this impact is considered less than significant with mitigation incorporated.	**N1 Mitigation-1.1:** Arrange activity areas on the site of the noise-producing project features, like buildings containing uses that are not noise sensitive, shield neighboring noise sensitive uses (City of San Luis Obispo Noise Element 1996). **N1 Mitigation-1.2:** Provide distance between noise source and development, implement planted barriers (City of San Luis Obispo Noise Element 1996).
P&R Impact 1: Because the Acacia commons has sufficient access to the necessary parks and open spaces, mitigation is not initially necessary. However, because this project might cause several of the parks and open spaces to be over capacity, some mitigation, while not required, is recommended.	**P&R Mitigation 1-1:** Construct additional open space or parks on the development site, as specified in the Parks and Recreation element (S. (2001, April 3). City of San Luis Obispo General Plan - Chapter 7: Parks and Recreation). **P&R Mitigation 1-2:** Implement an in-lieu fee in order to help develop parks elsewhere in the city, as specified in the Parks and Recreation element (S. (2001, April 3). City of San Luis Obispo General Plan - Chapter 7: Parks and Recreation).
U&S Impact 1: Because the city of SLO did not account for this project in the general plan buildout, mitigation measures need to be implemented.	**U&S Mitigation 1-1:** Prohibit the Acacia Commons from removing water from the site via any gutter, ditch or in any other manner over the surface of the ground, so as to constitute water waste runoff, as specified in the 2015 Urban Water Management Plan

	(UWMP – P. (2016, May). 2015 Urban Water Management Plan). **U&S Mitigation 1-2:** Limit all residents in the Acacia Commons to the specified maximum usages of water, as specified in 2015 Urban Water Management Plan (UWMP - P. (2016, May). 2015 Urban Water Management Plan).

Due to the constraints of a class project, we have not addressed all impact areas or prepared a mitigation monitoring program.

Introduction Background:

The Acacia Commons community concept is to create a village that mixes retail, office, and residential uses in a sustainable, walkable, small-town form (see Table 1 & Figure 1). The project has 264 apartment units (approx. 1,000 sq. ft. each) arranged in 3-story buildings of 12 units, a 55,000 sq. ft. retail center on the street frontage, and a 25,000 sq. ft. office building behind the retail center. The conversion of this site from degraded rangeland to urban uses will provide the City of San Luis Obispo with needed housing and revenue generating uses.

Table I-1: Acacia Commons--Proposed Uses

Proposed Uses			
Site area (ac.)	23.5		
USE	**Floor Area (sqft)**	**Units**	**Spaces**
Office	25,000		
Retail	55,000		
Total Non-Residential	80,000	264	
Residential: multi-family		264	
Total Residential			
Parking (non-garage)			
Non-residential			260
Residential: multi-family			264
Total Parking			524

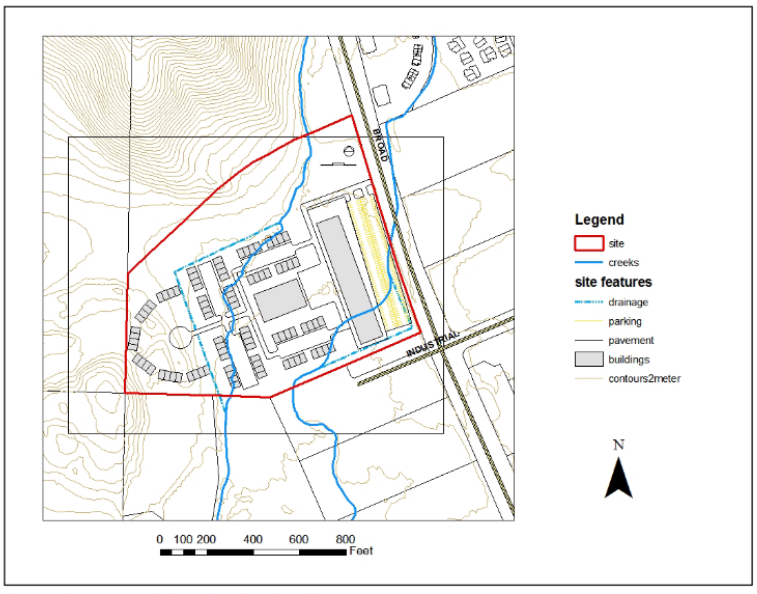


Figure 1: Proposed site plan for Acacia Commons.

Figure 1: Proposed site plan for Acacia Commons.

Site Description:

“The proposed project site is approximately 23.5-acreslocated on the west side of Broad Street (Highway 227) at the eastern edge of the City of San Luis Obispo in San Luis Obispo County, California (see Figures 2, 3, & 4). The project site is bordered by open space, agriculture, and rangelands to the north, south and west, and Broad Street commercial and residential land uses to the east. The site is located at the southeastern edge of the San Luis Obispo U.S.G.S. 7.5-minute quadrangle map in the southwestern corner of Section 1 (T. 31 S / R. 12E). Portions of Acacia and Orcutt creeks occur on the project site. Both onsite portions of these creeks are highly degraded from years of cattle grazing and other agricultural land use practices” (Greve, A. (2021, January). *Acacia Commons Development Plan* [PDF]. San Luis Obispo: Adrienne Greve.).

Purpose and Legal Authority:

“This EIR was prepared in accordance with the Guidelines for Implementation of the California Environmental Quality Act (CEQA), published by the Resources Agency of the State of California (Title 14, California Code of Regulations 15000 et. seq.), and the City of San Luis Obispo’s procedures for implementing CEQA. Per Section 21067 of CEQA and Sections 15367 and 15050 through 15053 of the State CEQA Guidelines, the City of San Luis Obispo is the Lead Agency under whose authority this document has been prepared. It is intended to provide information to public agencies, decision-makers, and the general public regarding the environmental impacts that would result from implementation of the proposed project. Under the provisions of CEQA, “the purpose of the environmental impact report is to identify the significant effects of a project on the environment, to identify alternatives to the project, and to indicate the manner in which significant effects can be mitigated or avoided” (Public Resources Code 21002.1[a]). The environmental review process was established to enable public agencies to evaluate a project in terms of its environmental consequences, to examine and implement methods of eliminating or reducing any potentially adverse impacts, and to consider alternatives to the project. While CEQA Section 15021(a) requires that major consideration be given to avoiding environmental damage, the Lead Agency and other responsible public agencies must balance adverse environmental effects against other public objectives, including social and economic goals, in determining whether and in what manner a project should be approved” (C. (2019, June). *ENVIRONMENTAL IMPACT REPORT FOR THE PREFUMO CREEK COMMONS PROJECT* [PDF]).

Contents Briefly explain organization of the document:

This document is organized into the following sections:

Outline:

Cover

Project title: Initial Study for the Hermosa Terrace Project; *list lead agency, primary consultant (you), and date*

Inside Cover Page

Repeats cover and includes additional details (class number/name, instructor, disclaimer)

Table of Contents

Summary of Impacts and Mitigation Measures

Create a table of impacts and mitigations (see Perfumo Creek Commons EIR as example)

Introduction

Background

Describe the project and setting; include maps.

Purpose and Legal Authority

Briefly explain CEQA purpose and process as it relates to this project.

Contents

Briefly explain organization of the document. Include a disclaimer at the end to state that due to the constraints of a class project we have not addressed all impact areas or prepared a mitigation monitoring program.

Environmental Impact Assessment and Mitigation Measures

The Initial Study template is used for this section.

References

Use APA citation format.

City of San Luis Obispo

INITIAL STUDY

ENVIRONMENTAL CHECKLIST FORM

For ER #2014-1

1. Project Title: Acacia Commons Project

2. Lead Agency Name and Address: Cal Poly CRP, San Luis Obispo, CA 93407

3. Contact Person and Phone Number: Francisco AlfaroZierten (206) 375-6533

4. Project Location: San Luis Obispo

5. Project Sponsor's Name and Address:
   Prestige Worldwide, Inc.
   Los Angeles, CA

6. Current Zoning Designation: Conservation/Open Space (C/OS)

7. Proposed Zoning Designation: Retail Commercial (C-R) & Medium-High Density

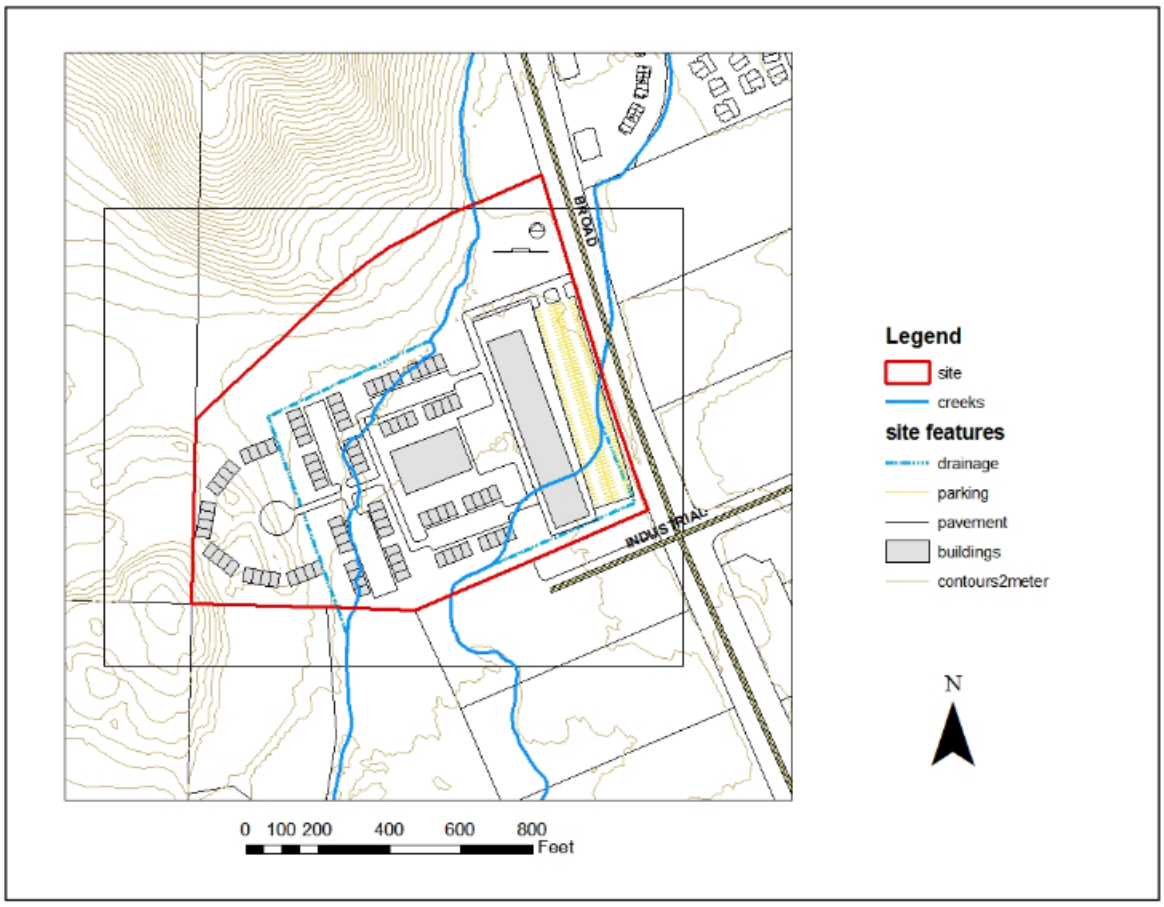


Figure 1: Proposed site plan for Acacia Commons.

Residential (R-4)

8. Description of the Project: A multi-building project of 160,000 sqft that will sit on a 23.5-acre lot. This project will include office, multi-family retail, and residential space, as well as non-garage parking.

9. Surrounding Land Uses and Settings: The project is surrounded by open space to the North and West, with Service-Commercial and Manufacturing across Broad St to the East, and Public Facilities South of the site.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

--X--	Aesthetics		Greenhouse Gas Emissions		Population / Housing
	Agriculture Resources		Hazards & Hazardous Materials		Public Services
--X--	Air Quality	--X--	Hydrology / Water Quality	--X--	Recreation
	Biological Resources		Land Use / Planning		Transportation / Traffic
	Cultural Resources		Mineral Resources	--X--	Utilities / Service Systems
	Geology / Soils	--X--	Noise		Mandatory Findings of Significance

FISH AND GAME FEES

	The Department of Fish and Game has reviewed the CEQA document and written no effect determination request and has determined that the project will not have a potential effect on fish, wildlife, or habitat (see attached determination).
	The project has potential to impact fish and wildlife resources and shall be subject to the payment of Fish and Game fees pursuant to Section 711.4 of the California Fish and Game Code. This initial study has been circulated to the California Department of Fish and Game for review and comment.

STATE CLEARINGHOUSE

	This environmental document must be submitted to the State Clearinghouse for review by one or more State agencies (e.g. Cal Trans, California Department of Fish and Game, Department of Housing and Community Development). The public review period shall not be less than 30 days (CEQA Guidelines 15073(a)).

DETERMINATION (To be completed by the Lead Agency):

On the basis of 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 in 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.	X
I find that the proposed project MAY have a "potentially significant" impact(s) or "potentially significant unless mitigated" impact(s) 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 potentially significant effects (1) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (2) have been avoided or mitigated pursuant to that earlier EIR of NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.	

Francisco Alfaro Zierten 03/19/2021

Signature Date

Francisco AlfaroZierten For: Michael Codron, Community Development Director

Printed Name

EVALUATION OF ENVIRONMENTAL IMPACTS:

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant._"Potentially Significant Impact' is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4. “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section 19, "Earlier Analysis," as described in (5) below, may be cross-referenced).

5. Earlier analysis may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration (Section 15063 (c) (3) (D)). In this case, a brief discussion should identify the following:
a) Earlier Analysis Used. Identify and state where they are available for review.

   b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

   c) Mitigation Measures. For effects that are “Less than Significant with Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or

refined from the earlier document and the extent to which they addressed site-specific conditions for the project.

6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7. Supporting Information Sources: A source list should be attached, and other sources used, or individuals contacted should be cited in the discussion.

8. The explanation of each issue should identify:

   a) the significance criteria or threshold, if any, used to evaluate each question; and

   b) the mitigation measure identified, if any, to reduce the impact to less than significance

INITIAL STUDY

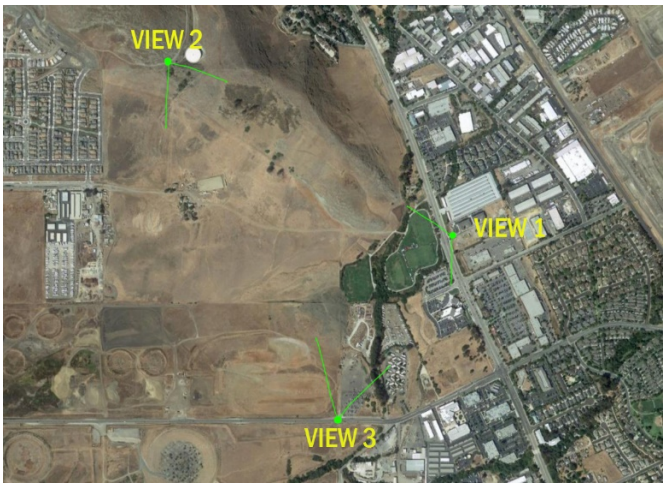
Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
1. AESTHETICS. Would the project:					
a) Substantially degrade the existing visual character or quality of the site and its surroundings?			--X--		
b) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?		--X--			

Introduction:

Aesthetic resources are an important aspect in development. This is because they can have important scenic and historical aspects that can contribute to the public's appreciation of the natural environment. Aesthetics are also important in the fact that they encompass the creation of light sources and glare. Specifically, light draws attention to textures, colors, and the general form of a space. Should the light and glare affect day or nighttime views in an area, it would result in washing out starlight, disrupt ecosystems, waste energy, and ultimately make the site unappealing.

Existing Conditions:

The site itself sits in an area that is relatively free from any forms of major development. This means that in and around the site, there is currently no significant light pollution. Another important thing of note is that the site is very close to the South Hills Open Space, which can be viewed from Broad St and Tank Farm Rd.



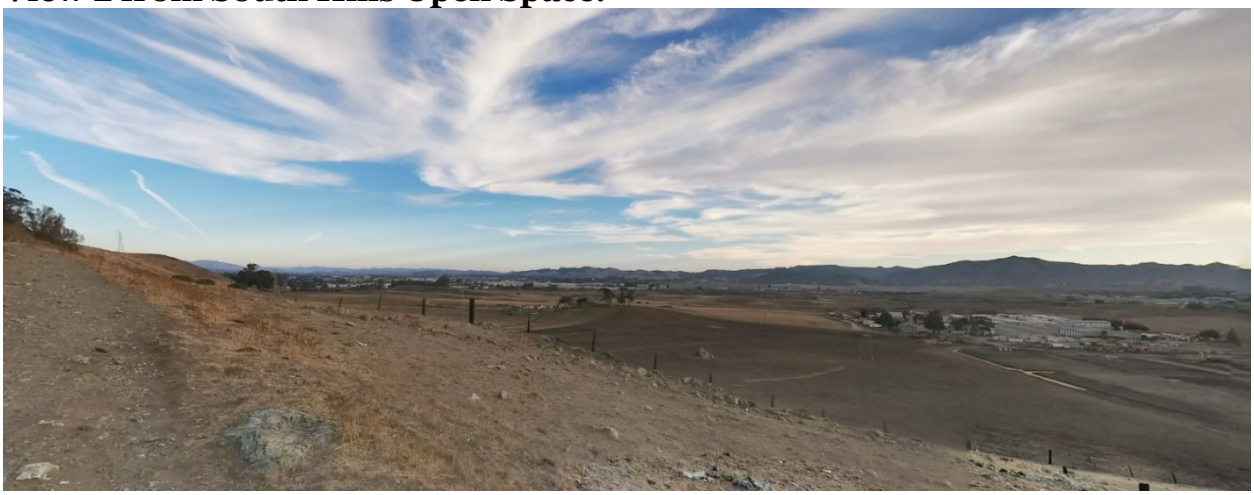
Impact Analysis:

The following views are shown through google maps and assess the potential impacts of the site development on the street views.

View 1 from Broad St.

AC Impact 1: One important view through the site is the West-facing view from Broad Street. This is an important public view because it is the main street that can access the site. The development would have a substantial adverse effect on the scenic vista viewable from Broad St. and would certainly affect the view in terms of viewshed blocking and light pollution. The main issue however is the creation of substantial light and glare due to the fact that the area has minimal development and would therefore exacerbate any light pollution. However, given the fact that most views from this sight are by car, I cannot say that it would be impactful to the public in a major way. Overall, the threat to this viewshed is not overly significant, and if mitigation measures were put in place, they would not have to be anything more than minor measures.

View 2 from South Hills Open Space.



AC Impact 2: A second important view onto the sight would be the view from the South Hills Open Space. This view is important because it provides a wide South-Southeast panoramic view that reaches towards the hills separating San Luis Obispo and Pismo. Development would have significant adverse effects on the scenic vista. It would also significantly degrade the existing visual quality of the site. Thirdly, the potential light pollution would have a significant impact on the view, however less so when compared to the view from Broad St., given that when looking at the site from the South Hills Open Space, the site is next to already developed areas. Given that the view from the South Hills Open Space is accessible solely to pedestrians, anyone that goes to the area to observe the view would have their situation affected in a significant way. Overall, the threat to this view is significant and would require some form of mitigation to be enacted.

View 3 from Tank Farm Road.

AC Impact 3: The third view onto the development site would be the North-facing view from Tank Farm Road. This is a significant view because not only does it encompass the South Hills area but is also a road that supports a heavy amount of consistent traffic. The site development would have a significant impact on this viewshed because by blocking the South Hills area, the impact it would have on the people travelling across Tank Farm Road would be incredibly noticeable and would most certainly affect a large number of individuals. Overall, the threat to this viewshed can easily be seen as significant and would require some form of mitigation.

Mitigation Measures:

The following mitigation measures should be put in place for visual characteristics of the site:
AC Mitigation 1-1: Limit the maximum building height to not exceed 20 feet above the average natural grade of the South Hills Open Space, in a similar fashion to what was recommended in the Southern California International Gateway Draft EIR.
AC Mitigation 1-2: Plant large trees around the sight so that any views into the sight are mostly foliage and plants instead of a built environment.

The following mitigation measures should be put in place for substantial light and glare:

AC Mitigation 2-1: Equip any security lighting installed on the property with motion detectors to prevent the illumination from remaining on in the retail sections during hours of non-operation, as seen in the Southern California International Gateway Draft EIR.

AC Mitigation 2-2: Limited or no use of reflective coatings on the outside of the buildings in the site, as seen in the Southern California International Gateway Draft EIR.

AC Mitigation 2-3: All exterior point-source lighting shall be directed downward and fully shielded from off-site views, as recommended in the Southern California International Gateway Draft EIR.

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
3. AIR QUALITY - Would the project:					
c) Violate any air quality standard or contribute substantially to an existing or projected air quality violation, and 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?		--X--			

Air Quality -

Introduction:

Air Quality degradation is often a product of both constructions, and the aftereffects of construction (e.g., induced transportation, HVAC, and lighting). Poor air quality can easily cause things such as vision impairment due to smog, as well as respiratory issues due to particles in the air, as stated by the Spare the Air organization; an organization dedicated to informing central coast residents about the impacts of poor air quality. Air quality is typically regulated by the Air Pollution Control District (APCD). Further mitigation measures for California are generally described in the APCD 2012 CEQA Handbook. CEQA being an acronym for the California Environmental Quality Act.

Site Description (Before):

According to the California standards, the site is at non-attainment concerning Ozone (O3), and Respirable Particulate Matter (PM10). It is however at attainment in regard to all other pollutants. It is however important to note that under federal standards, Ozone (O3) is attained.
It is also important to note that the site pre-development is empty, and that the non-attainment is for SLO County as a whole, nut just the site.

Table 3.1 – San Luis Obispo County Attainment Status Criteria

Site Description (After):

Post development there potentially will be a sizable increase in emissions; however this is not guaranteed, merely a prediction. Should this prediction be true however, Traffic will be the main cause behind the emissions that the development will generate, given that both residential and commercial-retail will be built. There is also the issue that the buildings in question will generate air quality issues due to the necessary heating and cooling processes that they will have to use throughout the year.

Thresholds and Standards

The thresholds and standards are set and maintained by ACPD (year). These thresholds are set for the Criteria for Air Pollutants (Table 1).

Table 3.2 - San Luis Obispo County Attainment Status

San Luis Obispo County Attainment Status

Pollutant	Averaging Time	California Standards****		Federal Standards****	
		Concentration	Attainment Status	Concentration	Attainment Status
Ozone (O_3)	1 Hour	0.09 ppm (180 µg/m³)	Non-Attainment	–	Non-Attainment Eastern SLO County - Attainment Western SLO County***
	8 Hour	0.070 ppm (137 µg/m³)		0.070 ppm (137 µg/m³)******	
Respirable Particulate Matter (PM10)	24 Hour	50 µg/m³	Non-Attainment	150 µg/m³	Unclassified*/ Attainment
	Annual Arithmetic Mean	20 µg/m³		–	
Fine Particulate Matter (PM2.5)	24 Hour	No State Standard	Attainment	35 µg/m³	Unclassified*/ Attainment
	Annual Arithmetic Mean	12 µg/m³		12.0 µg/m³ ****	
Carbon Monoxide (CO)	8 Hour	9.0 ppm (10 mg/m³)	Attainment	9 ppm (10 mg/m³)	Unclassified*
	1 Hour	20 ppm (23 mg/m³)		35 ppm (40 mg/m³)	
Nitrogen Dioxide (NO_2)	Annual Arithmetic Mean	0.030 ppm (57 µg/m³)	Attainment	0.053 ppm (100 µg/m³)	Unclassified*
	1 Hour	0.18 ppm (330 µg/m³)		100 ppb (196 mg/m³)	
Sulfur Dioxide (SO_2)	Annual Arithmetic Mean	–	Attainment	0.030 ppm (80 µg/m³)	Unclassified*
	24 Hour	0.04 ppm (105 µg/m³)		0.14 ppm (365 µg/m³)	
	3 Hour	–		0.5 ppm (1300 µg/m³)**	
	1 Hour	0.25 ppm (655 µg/m³)		75 ppb (196 mg/m³)	
Lead*	30 Day Average	1.5 µg/m³	Attainment	–	No Attainment Information
	Calendar Quarter	–		1.5 µg/m³	
	Rolling 3-Month Average*	–		0.15 µg/m³	
Visibility Reducing Particles	8 Hour	Extinction coefficient of 0.23 per kilometer – visibility of ten miles or more (0.07-30 miles or more for Lake Tahoe) due to particles when relative humidity is less than 70 percent. Method: Beta Attenuation and Transmittance through Filter Tape.	Attainment	No Federal Standards	
Sulfates	24 Hour	25 µg/m³	Attainment		
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m³)	Attainment		
Vinyl Chloride*	24 Hour	0.01 ppm (26 µg/m³)	No Attainment Information		

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

*** San Luis Obispo County has been designated non-attainment east of the -120.4 deg Longitude line, in areas of SLO County that are south of latitude 35.45 degrees, and east of the -120.3 degree Longitude line, in areas of SLO County that are north of latitude 35.45 degrees. Map of non-attainment area is available upon request from the APCD. **** For more information on standards visit: http://ww.arb.ca.gov/research/aaqs/aaqs2.pdf

Attainment (EPA/Federal definition): Any area that meets the national primary or secondary ambient air quality standard for that pollutant. (CA definition): State standard was not exceeded during a three year period. ***** Federal PM2.5 Secondary Standard is 15µg/m³

Non-Attainment (EPA/Federal definition): Any area that does not meet, or contributes to an area that does not meet the national primary or secondary ambient air quality standard for that pollutant. (CA definition): State standard was exceeded at least once during a three year period. ******The 2008 NAAQS for 8hr ozone is 0.075 ppm. The 2015 NAAQS for 8hr ozone is 0.070 ppm. The attainment status shown in this table relates to the 2008 and 2015 NAAQS. SLO County has been designated non-attainment of the 2015 NAAQS. NAAQS is National Ambient Air Quality Standards H:\AUTRE\ACH\Attainment\Items Revised January 29, 2019

Table 3.3 - Table of Thresholds of Significance for Operational Emissions Impacts

Table 3-2: Thresholds of Significance for Operational Emissions Impacts

Pollutant	Threshold[1]	
	Daily	Annual
Ozone Precursors (ROG + NO_x)[2]	25 lbs/day	25 tons/year
Diesel Particulate Matter (DPM)[2]	1.25 lbs/day	
Fugitive Particulate Matter (PM_{10}), Dust	25 lbs/day	25 tons/year
CO	550 lbs/day	
Greenhouse Gases (CO_2, CH_4, N20, HFC, CFC, F6S)	Consistency with a Qualified Greenhouse Gas Reduction Plan OR 1,150 MT CO_2e/year OR 4.9 CO_2e/SP/year (residents + employees)	

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

Impact Assessment:

Impact Analysis

The California Emissions Estimator Model (CalEEMod) is what was used to analyze potential impacts. It is appropriate because it automatically calculates the impacts based on relevant threshold data and is endorsed by the regulating agency.

CalEEMod calculated the impact analysis based on specifications given as a user input. These specifications are based on the characteristics of the proposed project. This is appropriate because CalEEMod only uses verified sources of data to calculate the impact and notifies you on what factor is above threshold/ not at attainment, based on the aforementioned verified sources. Source?

The independent evaluation performed on CalEEMod is compared to the following thresholds of significance table for Operation Emissions table, as well as any other data repository that hold relevant information. Because of our access to the APCD 2012 CEQA Handbook, we were able to find the following information:

Table 3.4 - Table of Overall Operational

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	2.0687	0.0328	2.7332	1.2000e-004		0.0148	0.0148		0.0148	0.0148	0.0000	4.1102	4.1102	2.9600e-003	0.0000	4.1841
Energy	0.0185	0.1620	0.0953	1.0100e-003		0.0128	0.0128		0.0128	0.0128	0.0000	183.1692	183.1692	3.5100e-003	3.3600e-003	184.2576
Mobile	0.9562	2.7504	6.7272	0.0134	1.0833	0.0141	1.0974	0.2899	0.0132	0.3031	0.0000	1,231.3745	1,231.3745	0.0662	0.0000	1,233.0306
Waste						0.0000	0.0000		0.0000	0.0000	30.8859	0.0000	30.8859	1.8253	0.0000	76.5185
Water						0.0000	0.0000		0.0000	0.0000	8.4453	50.8858	59.3311	0.8697	0.0210	87.3194
Total	**3.0434**	**2.9452**	**9.5556**	**0.0146**	**1.0833**	**0.0417**	**1.1250**	**0.2899**	**0.0408**	**0.3307**	**39.3312**	**1,469.5397**	**1,508.8709**	**2.7677**	**0.0243**	**1,585.3103**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	11.75	37.23	41.13	61.61	68.50	38.45	67.92	68.50	37.82	66.46	37.31	67.65	67.24	36.86	39.40	66.47

Table 3.5 - Table of Winter Mitigated Operation

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	11.3689	0.1990	16.5646	7.5000e-004		0.0899	0.0899		0.0899	0.0899	0.0000	27.4587	27.4587	0.0198	0.0000	27.9529
Energy	0.1014	0.8875	0.5220	5.5300e-003		0.0701	0.0701		0.0701	0.0701		1,106.3530	1,106.3530	0.0212	0.0203	1,112.9276
Mobile	6.2331	17.3623	44.4624	0.0832	6.9557	0.0895	7.0452	1.8577	0.0835	1.9412		8,404.6271	8,404.6271	0.4757		8,416.5203
Total	**17.7034**	**18.4489**	**61.5490**	**0.0895**	**6.9557**	**0.2494**	**7.2051**	**1.8577**	**0.2434**	**2.1011**	**0.0000**	**9,538.4389**	**9,538.4389**	**0.5167**	**0.0203**	**9,557.4007**

AQ Impact 1: According to the threshold for Ozone Precursors (ROG+NOx), the threshold that should not be surpassed in order to stay at attainment is 25 lbs. per day. However, according to the Winter Mitigated Operational table (Table 4), the total is 17.7034+18.4489 which is 36.1523 lbs. per day. Therefore, making it non-attainment and resulting in further mitigation measures needing to be put in place.

AQ Impact 2: For the Diesel Particulate Matter (DPM), the threshold that should not be surpassed is 1.25 lbs. per day. According to the Winter Mitigated Operational Table (Table 4), there is a PM2.5 total of 2.1011 lbs. per day. With this being above the 1.25 lb. per day threshold, mitigation measures need to be enacted.

AQ Impact 3: For Fugitive Particulate Matter (PM10), the given threshold is 25 tons per year. The Annual Mitigated Operational table (Table 3) shows that the PM10 total is 1.1250 tons per year. Mitigation measures will still have to be implemented because pre-development, the PM10 amount is at non-attainment.

AQ Impact 4: For CO, the threshold is at 550 lbs. per day, which is approximately 100.375 tons per year. The actual tons per year is 9.5556, meaning that it is significantly lower than the threshold, and therefore requires no mitigation measures.

Mitigation Measures:

The following mitigation measures should be put in place for Ozone Precursors:
AQ Mitigation 1-1: Provide improved public transit amenities (e.g.: covered transit turnouts, direct pedestrian access, bicycle racks, covered bench, smart signage, route information displays, lighting, etc.), as specified in the *APCD 2012 CEQA Handbook*. This would be for any new transit stops on the site, should they be included in the development.
AQ Mitigation 1-2: Provide and require the use of battery powered or electric landscape maintenance equipment, as specified in the *APCD 2012 CEQA Handbook*.

The following mitigation measures should be put in place for DPM:

AQ Mitigation 2-1: Enforce "No Idling" for vehicles on the property, as specified in the *APCD 2012 CEQA Handbook*. This would specifically apply to delivery trucks operating for any retail within the site.
AQ Mitigation 2-2: Utilize alternative fuel vehicles during the operational phase of development, as specified in the *APCD 2012 CEQA Handbook*.

The following mitigation measures should be put in place for PM10.
AQ Mitigation 3-1: Design and build high density, compact development within the site to encourage alternative transportation (walk, bike, bus, etc.), as specified in the *APCD 2012 CEQA Handbook*. This would specifically be applied to the office and retail spaces on the site.
AQ Mitigation 3-2: Provide on-site bicycle parking: both short-term racks and long-term lockers, or a locked room with standard racks and access limited to bicyclists only, as specified in the *APCD 2012 CEQA Handbook*. This would be provided by both office and retail, and would be used by employees, residents, and customers.

Further Mitigation Measures can be found in the (APCD 2012 CEQA Handbook).

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
9. HYDROLOGY AND WATER QUALITY. Would the project:					
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on or off site, and Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?			X		

Hydrology -

Introduction:

Hydrology issues are a serious issue that must be addressed during the operational stage of development. Alterations in existing drainage patterns can easily result in flooding and water damage to property because of failing to take water into account during construction. The group responsible for regulating water would be the State Water Resources Control Board. The State Water Resources Control Board is a five-member board appointed by the governor that allocates water rights for California surface water and regulates state water quality.

Existing Conditions

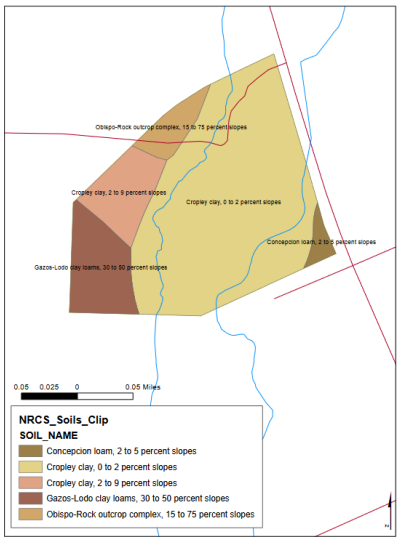


Figure 1. – On Site Soil Types

Figure 1 shows soils types present on the site. This helps us see the ground permeability in different areas of the site so as to gain a better understanding of potential water runoff that could occur on site.
We can also see in the figure below, the current rainfall data for the site. This is used to help determine the runoff on the site, so as to get baseline numbers for runoff.
The project site also has several types of soil within it. The site's soil consists of concepion loam, cropley clay, gazos-lodo clay loams, and Obispo-rock outcrop complex as shown in *Figure 1*.

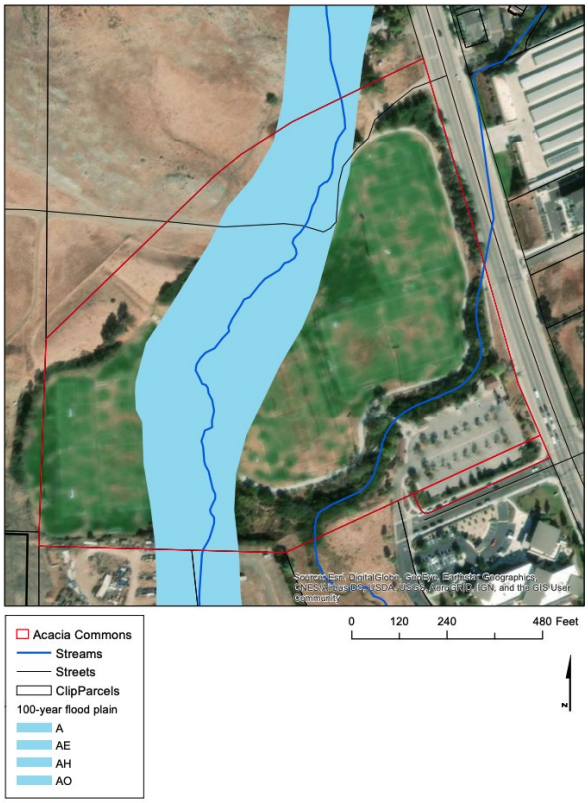


Figure 2: A map indicating floodplains on project site.

The development will be built upon the area of the site with less than 2 percent slope. There is also a floodplain on the site as shown in *Figure 2*, which part of the development will be built in/around.

Table 9.1 – Average Rainfall for Storms of Given Return Intervals at a Given Time of Concentration.

Rainfall - Intensity Data (mm/hr), Areas With 550 mm to 700 mm Annual Rainfall

Recurrence Interval (years)	Duration							
	10 min	15 min	30 min	1 hr	2 hrs	3 hrs	6 hrs	10 hrs
2	53	46	30	19	14	12	9.1	7.1
5	74	64	43	27	19	17	13	10
10	91	76	53	33	23	21	16	12
25	102	89	61	38	28	25	20	15
50	117	99	66	43	33	29	23	18
100	127	109	74	47	35	31	25	19

Thresholds

Runoff shall be managed to prevent any significant increase in downstream peak flows, including 2-year, 10-year, 50-year, and 100-year events. Significant generally means an increase of over 5 percent (San Luis Obispo County Flood Control District. 2003, February). Significant means an increase of over 5 percent in maximum or peak flow as stated by the San Luis Obispo Creek Drainage Design Manual, 2003. The California State Water Resources Control Board sets the thresholds of stormwater runoff.

Impact Analysis

Peak or max runoff rate = dimensionless runoff coefficient x rainfall (inches per hour) x area of catchment

The Rational Method model is the method used for calculating the stormwater runoff. (San Luis Obispo County Flood Control District. 2003, February) The Rational Method model is:

$$Q=C*i*A$$

Where:

Q= peak/maximum runoff rate

C= runoff coefficient

i= rainfall intensity for design storm (inches/hour)

A= drainage basin area (acres)

Table 9.2 - Runoff Coefficients

Runoff Coefficients

Type of Developments	Hydrologic Soil Group	Run-off Coefficients for Slopes		
		<2%	2-10%	>10%
Single-Family Residential Lots				
1,860 sq. m (20,000 sq. ft.)	D	0.40	0.45	0.55
	C	0.30	0.40	0.50
930 sq. m (10,000 sq. ft.)	D	0.40	0.50	0.60
"	C	0.35	0.40	0.50
560 sq. m (6,000 sq. ft.)	D	0.50	0.60	0.65
"	C	0.45	0.50	0.60
Apartments				
1,800 sq. ft. (167 sq. m)	C	0.60	0.70	0.80
"	D	0.50	0.60	0.70
Heavy Industrial	D	0.85	0.87	0.90
	C	0.80	0.85	0.87
Light Industrial	D	0.80	0.85	0.87
"	C	0.70	0.75	.80
Downtown Commercial	D	0.85	0.87	0.90
"	C	0.80	0.82	0.85
Neighborhood Commercial	D	0.65	0.75	0.80
	C	.50	0.60	0.70
Dense Vegetation	D	0.25	0.30	0.40
(oak woodland, brushland)	C	0.20	0.25	0.35
Moderate Vegetation	D	0.25	0.35	0.45
(grasslands w/scattered trees & brush)	C	0.25	0.30	0.35
Sparse Vegetation	D	0.40	0.45	0.50
(grasslands and pasture)	C	0.30	0.35	0.40
Agricultural	D	0.20	0.20	0.25
(cropland)	C	0.15	0.15	0.20
Impervious Surfaces		0.85	0.87	
(streets, parking lots, garages and roofs)		0.80	0.85	0.90
Unimproved Vacant Lands	D	0.15	0.20	0.30
(parks, cemeteries, golf courses, and lawns)	C	0.10	0.15	0.20

Notes:

These values are intended to be a minimum; higher values may be required by the City Engineer or County Public Works Director.

Hydrologic Soil Group

C = Sandy Loam, Gravel, Loam
D = Clay, Adobe, Shallow Soil and/or Rockland. Refer to USDA San Luis Obispo Area Soil Survey for hydrologic soil groups.

Using the provided equations and data, we can see the data that results from the site, both pre-development and post-development:

Pre-Development												
40%												
acres	23.5											
Soil Group D			Qpre									
2	46	1.8110246	17.02363124									
10	64	2.5196864	23.68505216									
50	99	3.8976399	36.63781506									
100	109	4.2913409	40.33860446									
Post Development												
Multi-housing: 8 acres			Parking and streets: 2 acres			Commercial: 2.5			Vacant Land: 11 acres			
8			2			2.5			11			
2	1.8110246	7.2440984	2	1.8110246	3.07874182	2	1.8110246	2.94291498	2	1.8110246	7.96850824	
10	2.5196864	10.0787456	10	2.5196864	4.28346688	10	2.5196864	4.0944904	10	2.5196864	11.0866202	
50	3.8976399	15.5905596	50	3.8976399	6.62598783	50	3.8976399	6.33366484	50	3.8976399	17.1496156	
100	4.2913409	17.1653636	100	4.2913409	7.29527953	100	4.2913409	6.97342896	100	4.2913409	18.8819	
Qpost-Qpre/Qpre												
	Qpost	Qpost-Qpre	(Qpost-Qpre)/Qpre									
2	21.2342634	4.2106322	24.73%									
10	29.543323	5.85827088	24.73%									
50	45.6998278	9.06201277	24.73%									
100	50.3159721	9.97736759	24.73%									

HWQ Impact 1: When we then compare the area of catchment, we can see that there is an increase of 24.73% in each of the evaluated years when looking at the above data. All of these changes are above 5% and are therefore considered significant and will require mitigation measures to be put in place.

Mitigation

In order to mitigate the excessive amount of runoff, the following mitigation measures can be enacted in accordance with the Drainage Design Manual (DDM):

HWQ Mitigation 1-1: Implement the use of sandbags, straw bales, and temporary desilting basins during the project construction in order to prevent discharge of sediment-laden runoff into stormwater facilities, as specified in the DDM.
HWQ Mitigation 1-2: Limit temporary storage of construction equipment to a minimum of 100 feet away from drainages on the project site in the operational phase, as specified in the DDM.
HWQ Mitigation 1-3: Use vegetated buffer strips so as to reduce sediment and particulate forms of metals and nutrients from entering the drainage system, as specified in the DDM. This would specifically be placed around the project site to reduce articulates entering the drainage system on Broad street.

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact

ER #			Incorporated		

12. NOISE. Would the project result in:					
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?		--X--			

Introduction:

Noise is an important aspect that needs to be considered during an operational phase, as well as post development of a site. Noise in excess is a very undesirable characteristics seeing as how people generally do not like to live in or near noisy areas. Excessive noise can cause several issues such as stress, annoyance, high blood pressure, speech interference, hearing loss, sleep disruption, lack of productivity, and can ultimately impact quality of life in a negative way.

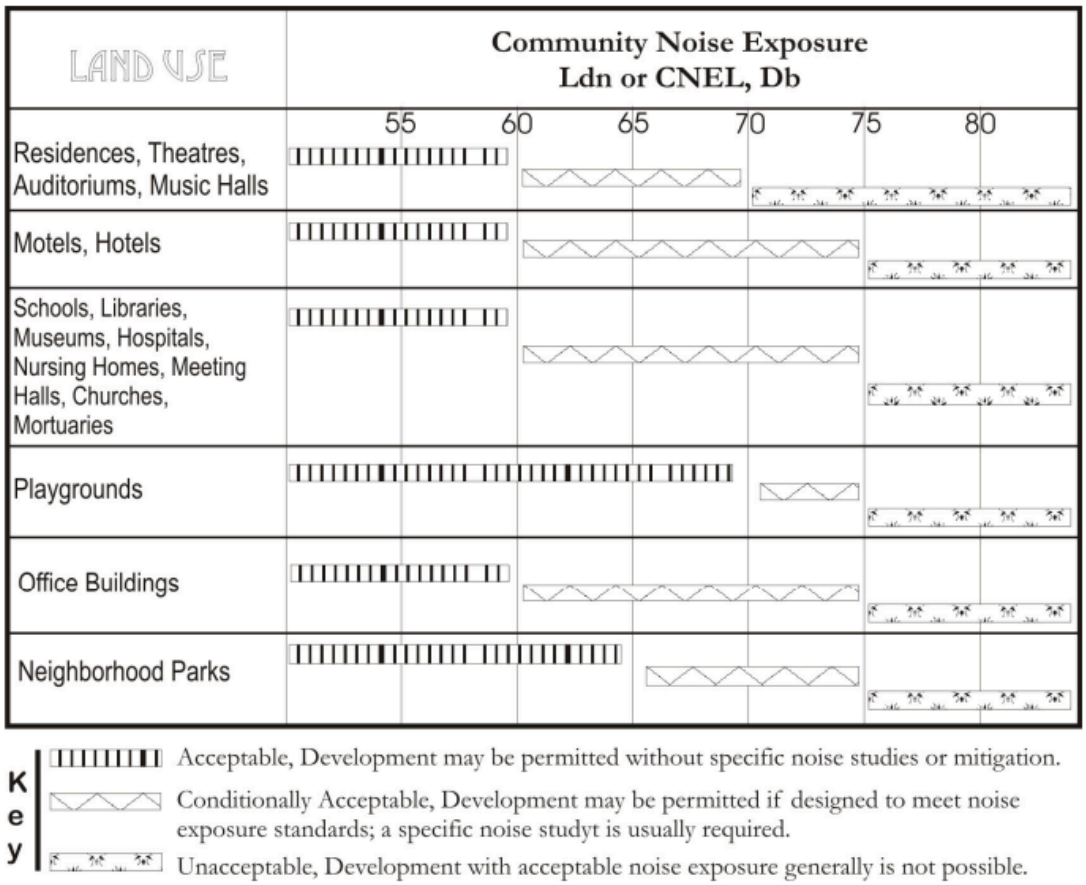
Existing Conditions:

The site is located near two sources of noise that need to be considered. The first is Broad St, a busy street that transitions to the 227 State highway. Broad St also is the main avenue into San Luis Obispo for people entering from Southeast of the site. The second source of noise is the San Luis Obispo County Regional Airport. The airport is just South of the site and has the potential to be a large source of noise due to the constant plane travel into San Luis Obispo. These noise levels will be assessed based on the three uses that will be present post construction. These uses being residential, retail, and office.

Significant level (threshold of significance/ EIA standards):

The thresholds and standards for noise levels can be seen in *Table 12.1* and are set by the city of SLO in the Noise Element.

Table 12.1 – Indicates the acceptable and unacceptable noise levels based on land use.



Impact Analysis:

To determine if noise from Broad St and the San Luis Obispo Country Regional Airport is above the given thresholds, figures 3 and 4 are used to assess any potential noise impact.

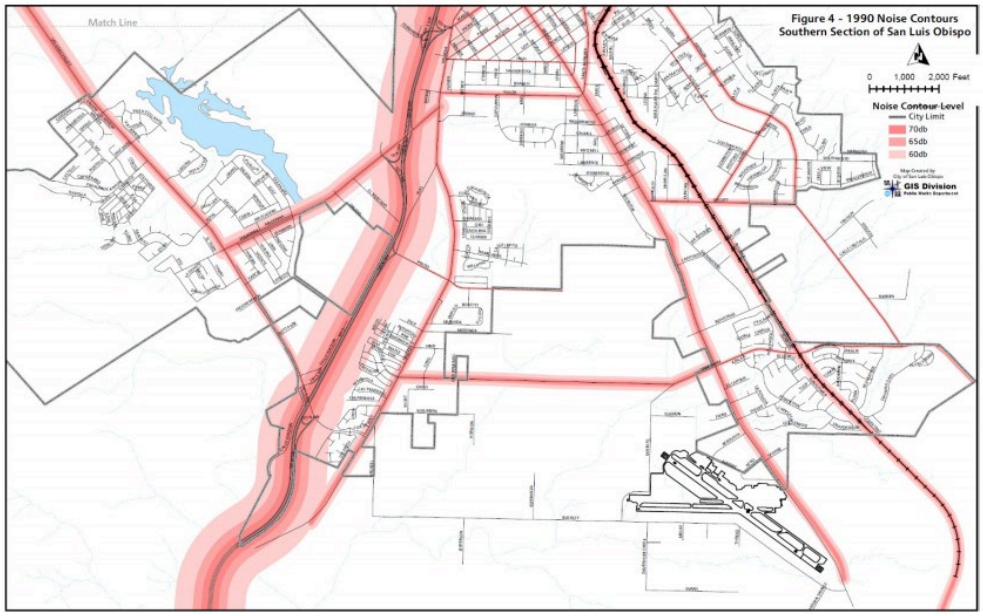


Figure 3: Map that indicates noise generated from streets.

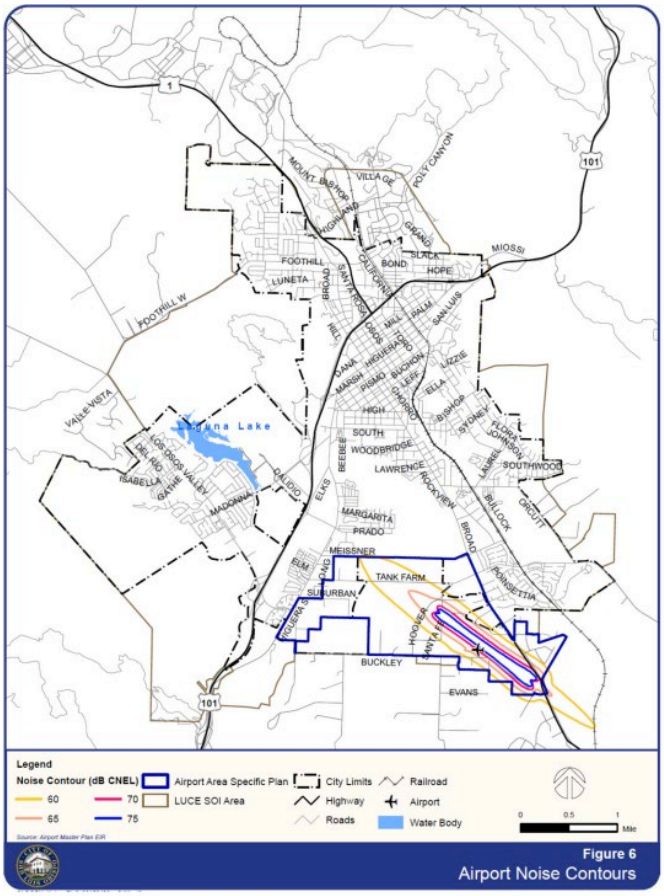


Figure 4: Map that indicates areas that are affected by the noise produced by the Airport.

Residential and office land use areas are given an acceptable noise threshold of 60 decibels. Retail land uses are not listed in the San Luis Obispo Noise element, so they will be held to the same standard as the other uses that will be put on the site.

N Impact 1: Broad St obviously produces noise, however the levels of noise produced from the street are 70db, 65db, and 60db. Noise levels of 60db are not an issue, however the 65 and 70db noises may cause issues. If the site places parking next to Broad St, then commercial/retail and the residential areas are less likely to be affected by noise, meaning that mitigation should not be needed. Because of this, this impact is considered *less than significant with mitigation incorporated*.

N Impact 2: Since the Acacia Commons project site is outside the areas which are affected by the noise produced by the San Luis Obispo County Airport, this can be considered to have no impact.

Mitigation Measures:

N1 Mitigation-1.1: Arrange activity areas on the site of the noise-producing project features, like buildings containing uses that are not noise sensitive, shield neighboring noise sensitive uses (City of San Luis Obispo Noise Element 1996).

N1 Mitigation-1.2: Provide distance between noise source and development, implement planted barriers (City of San Luis Obispo Noise Element 1996).

Issues, Discussion and Supporting Information Sources ER #	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

15. RECREATION.					
a) Would the project increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?			--X--		
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?					--X--

Introduction:

Open space and recreational facilities are an important aspect of cities. This is because they provide areas for citizens to maintain their health, while also functioning as gathering spaces for communities. Additionally, parks help support infrastructure such as schools and can protect environmental assets such as groundwater and native flora and fauna. They have even been proven to increase land values in their proximity. It is important to note that any new development that increases city population will increase use of recreational facilities, and therefore planners should strive to provide park access to everyone while also ensuring existing open spaces are not overused or overburdened.

Existing Conditions:

The following figure indicates the existing parks and recreational facilities near the sight.

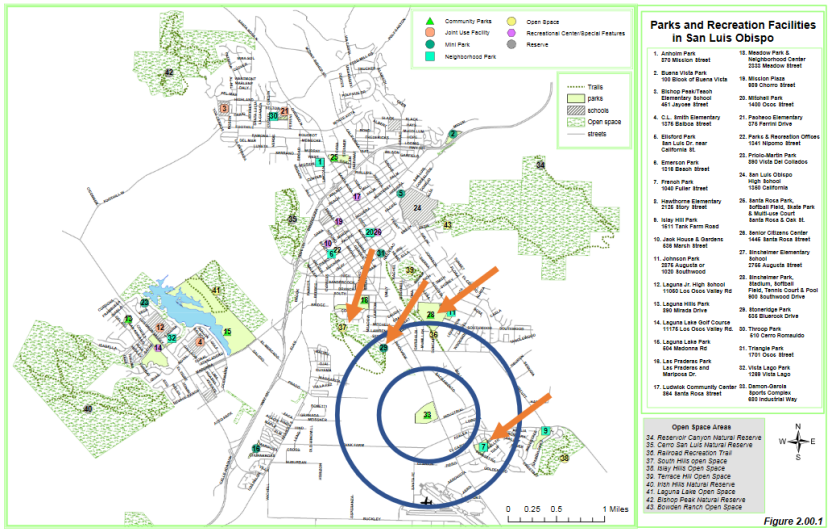


Figure 5 – Parks and Recreational Facilities in SLO.

Significant level (threshold of significance/ EIA standards):

Number of potential residents: 528

This requires a total of 5.28 acres, where 2.64 acres are required to be neighborhood parks.

Policies:

- Policy 3.13.1. The City shall develop and maintain a park system at the rate of 10 acres of parkland per 1,000 residents. Five acres shall be dedicated as a neighborhood park. The remaining five acres required under the 10 acres per 1000 residents in the residential annexation policy may be located anywhere within the City's park system as deemed appropriate.

- Policy 3.14.4. New significant residential developments and annexations shall provide sufficient athletic fields to meet the demands of the youth who will reside in the development.

- Policy 3.15.3. All residential annexation areas shall provide developed neighborhood parks at the rate of 5 acres per 1000 residents.

All the above policies are found in the General Plan - Parks and Recreation Element.

Impact Analysis:

The city does provide the appropriate amount of park acreage for the Acacia Commons Project:
The following parks are within a mile radius of the site.
Park 7 - French Park (10 acres)

Park 28 - Sinsheimer Park (23.5 acres)
Park 29 - Stoneridge Park (0.5 acres)
Park 37 - South Hills Open Space (60 acres)

P&R Impact 1: Because the Acacia commons has sufficient access to the necessary parks and open spaces, mitigation is not initially necessary. However, because this project might cause several of the parks and open spaces to be over capacity, some mitigation, while not required, is recommended.

Mitigation Measures:

P&R Mitigation 1-1: Construct additional open space or parks on the development site, as specified in the Parks and Recreation element (S. (2001, April 3). City of San Luis Obispo General Plan - Chapter 7: Parks and Recreation).
P&R Mitigation 1-2: Implement an in-lieu fee in order to help develop parks elsewhere in the city, as specified in the Parks and Recreation element (S. (2001, April 3). City of San Luis Obispo General Plan - Chapter 7: Parks and Recreation).

Issues, Discussion and Supporting Information Sources ER #	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

17. UTILITIES AND SERVICE SYSTEMS. Would the project:					
a) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new and expanded entitlements needed?		--X--			
b) 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?				--X--	

Introduction:

Existing Conditions:

The following tables show the existing water availability and storage capacity for SLO:

Table 17.1 – Water availability for the city of SLO separated by water resource.

Table 1. City Water Resource Availability

Water Resource	2016 Annual Availability	
Salinas Reservoir (Santa Margarita Lake) and Whale Rock Reservoir	6,940 AF	Safe Annual Yield
Nacimiento Reservoir	5,482 AF	Contractual Limit
Recycled Water	187 AF	2015 Annual Usage
Siltation to 2060	(500 AF)	Policy A 4.2.2
TOTAL	**12,109 AF**	

Note: *The quantity of recycled water included as part of the City's available water resources identified above, is the actual prior year's recycled water usage (2015), per Policy A 7.2.2.*

Source: *City of San Luis Obispo Utilities Department, 2016.*

Table 17.2 – Reservoir storage capacity allotment based on agency.

Table 4. Reservoir Storage Capacity

Agency	% Entitlement	Original Storage Capacity (AF)	Revised Storage Capacity (AF)	Difference (AF)	Revised Total Available Water * (AF)
City of San Luis Obispo	55.05	22,384	**21,451**	933	**20,350**
Cal Poly	33.71	13,707	**13,136**	571	**12,462**
CMC	11.24	4,570	**4,380**	191	**4,155**
Total	100 %	40,662 AF	**38,967 AF**	1,695 AF	**36,967 AF**

Source: *Whale Rock Reservoir Bathymetric Survey and Volumetric Study*, 2013.
*Total Available Water is agency share of reservoir storage capacity minus agency proportional share of minimum pool requirements.

Table 17.3 – 2019 SLO water supply by source

2019 City Water Supply by Source
(in acre feet)

Nacimiento Reservoir	Whale Rock Reservoir [2]	Recycled Water	Salinas Reservoir	Groundwater [3]	Total City Water Demand
3,406	350	201	805	0	4,762
71.5%	7.4%	4.2%	16.9%	0%	100%

Notes:
1. Values are rounded.
2. Water delivered to Cal Poly State University is excluded from the City's water demand.
3. Groundwater was not used for potable purposes during Water Year 2019.

Thresholds and Standards:

CEQA Appendix G asks if there is enough water to serve the project. If there is not, mitigation is required.

Impact Analysis:

Estimated Drinking Water Demand for the site:

Units 264 Multi-Family Residential

264*0.21 = 55.44 AFY

55,000 sqft of Retail
55*.11 = 6.05 AFY

11 acres of Open Space

11*2.64 = 29.04 AFY

25000 sqft of Office

25*.032 = .8 AFY

Total Water Demand: 91.33 AFY

Wastewater: 63.931 AFY. 70% of the water used ends up as wastewater.

This demand does exceed the capacity because the Acacia Commons project is a general plan amendment and therefore was not accounted for during the general plan buildout.

Because we have supply beyond development build out estimates, the water reclamation facility will not require upgrades due to the construction of the Acacia Commons. The city will however have to utilize secondary water supplies which can cause future issues in drought years or other unforeseen incidents. This information was found in the 2015 Urban Water Management Plan. This can also be seen in the below table that indicates SLO's water supply and demand.

Table 17.4 - Supply and Demand

TABLE 29: Single Dry Year Supply and Demand Comparison

	2020	2025	2030	2035
Supply totals	12,622	12,672	12,722	12,772
Demand totals	6,599	6,975	7,369	7,779
Difference	6,023	5,697	5,353	4,993

NOTES
1. Units are in acre-feet per year.
2. Department of Water Resources, Table 7-3.
3. Demand totals are projected using 117 gpcd.

Source: City of San Luis Obispo Utilities Department

U&S Impact 1: Because the city of SLO did not account for this project in the general plan buildout, mitigation measures need to be implemented.

U&S Impact 2: Because the water reclamation facility in SLO does not need to be upgraded based on the construction of the Acacia Commons, no mitigation is directly necessary for the project, even though it will cause the city to have to use secondary water supplies.

Mitigation Measures:

U&S Mitigation 1-1: Prohibit the Acacia Commons from removing water from the site via any gutter, ditch or in any other manner over the surface of the ground, so as to constitute water waste runoff, as specified in the 2015 Urban Water Management Plan (UWMP – P. (2016, May). 2015 Urban Water Management Plan).

U&S Mitigation 1-2: Limit all residents in the Acacia Commons to the specified maximum usages of water, as specified in 2015 Urban Water Management Plan (UWMP - P. (2016, May). 2015 Urban Water Management Plan).

References & Citations:

Greve, A. (2021, January). *Acacia Commons Development Plan* [PDF]. San Luis Obispo: Adrienne Greve.

APCD 2012 CEQA Handbook -
C. (2012, April). CEQA Air Quality Handbook. Retrieved February 23, 2021, from https://canvas.calpoly.edu/courses/42990/modules/items/1102624

APPENDIX B Aesthetics Visual Resource Methodology [PDF]. (2021, March 4). Canvas.

CalEEMod. (2021, February). Acacia Commons: San Luis Obispo County, Annual.

CalEEMod. (2021, February). Acacia Commons: San Luis Obispo County, Winter.

Corbitt A. Robert (1999) Standard Handbook of Environmental Engineering. Retrieved from https://www.academia.edu/965764/Standard_handbook_of_environmental_engineering

C. (2019, June). *ENVIRONMENTAL IMPACT REPORT FOR THE PREFUMO CREEK COMMONS PROJECT* [PDF].

General Plan Parks and Recreation Element -
S. (2001, April 3). City of San Luis Obispo General Plan - Chapter 7: Parks and Recreation. Retrieved March 2, 2021, from https://www.slocity.org/home/showpublisheddocument?id=6647

San Luis Obispo County Air Pollution Control District. (2012, April). CEQA air quality handbook: A guide for assessing the air quality impacts for projects subject to CEQA review. Retrieved from https://storage.googleapis.com/slocleanair-org/images/cms/upload/files/CEQA_Handbook_2012_v2%20%28Updated%20Map2019%29_LinkedwithMemo.pdf

San Luis Obispo County Air Pollution Control District. (2019, January). San Luis Obispo County Attainment Status. Retrieved from https://storage.googleapis.com/slocleanair-org/images/cms/upload/files/AttainmentStatus29January2019.pdf

San Luis Obispo County Flood Control District. (2003, February). Waterway Management Plan Volume 3, Drainage Design Manual. Retrieved from https://www.slocity.org/Home/ShowDocument?id=4400

SLO CEQA Factors. (n.d.). Retrieved February 25, 2021, from https://canvas.calpoly.edu/courses/42990/files/2728960?module_item_id=976983

Spare the Air organization –

S. (n.d.). Spare the air every day. Retrieved March 14, 2021, from https://www.sparetheair.org/about/what-is-spare-the-air

Southern California International Gateway Draft EIR –
Southern California International Gateway Draft EIR, (2011, September) Aesthetics Visual Resource Methodology Retrieved March 17, 2021, from Assessing Impacts on Aesthetics-Visual Resources.pdf

SLO Drainage Design Manual -
S. (2014, February 23). S. (2014, February 23). City of San Luis Obispo Water Management Plan - Volume 3. Retrieved February 24, 2021, from https://www.slocity.org/Home/ShowDocument?id=4400

UWMP - P. (2016, May). 2015 Urban Water Management Plan. Retrieved February 25, 2021, from http://www.slocity.org/home/showdocument?id=10753

Figure 1 -
Acacia Commons Soils Slope. (n.d.). Retrieved February 24, 2021, from https://canvas.calpoly.edu/courses/42990/files/3288603?module_item_id=1099284

Figure 2 -
Acacia Commons Flood Plain. (n.d.). Retrieved February 24, 2021, from https://canvas.calpoly.edu/courses/42990/files/3288603?module_item_id=1048780

Figure 5 –
Greve, A. (2021, March 2). *Recreation_Parks* [PDF]. Canvas.

Table 3.1 -
S. (n.d.). APCD Attainment Table. Retrieved February 16, 2021, from https://canvas.calpoly.edu/courses/42990/modules/items/1102627

Table 3.2 -
C. (2012, April). Ambient Air Quality Standards (State and Federal) . Retrieved February 23, 2021, from https://canvas.calpoly.edu/courses/42990/modules/items/1102624

Table 3.3 -
CalEEMod_OutputAnnual.pdf [PDF]. (Accessed 2021, February 23).

Table 3.4 -
CalEEMod_OutputWinter.pdf [PDF]. (Accessed 2021, February 23).

Table 3.5 -

S. (2014, February 23). City of San Luis Obispo Water Management Plan - Volume 3. Retrieved February 24, 2021, from https://canvas.calpoly.edu/courses/42990/files/2728979?module_item_id=976941

Table 9.1 -

S. (2014, February 23). City of San Luis Obispo Water Management Plan - Volume 3. Retrieved February 24, 2021, from file:///C:/Users/PALFA_~1/AppData/Local/Temp/WMPDrainageDesignManual.pdf

Table 9.2 -

D. (2003, February). *SLO Drainage Design Manual* [PDF]. San Luis Obispo.

Table 17.1 –

City Water Resource Availability. (2014, December 9). City of San Luis Obispo General Plan - Chapter 8: Water and Wastewater. Retrieved February 23, 2021, from https://www.slocity.org/home/showdocument?id=6649

Table 17.2 –

Reservoir Storage Capacity. (2014, December 9). City of San Luis Obispo General Plan - Chapter 8: Water and Wastewater. Retrieved February 23, 2021, from https://www.slocity.org/home/showdocument?id=6649

Table 17.3 –

2019 City Water Supply by Source. (2014, December 9). City of San Luis Obispo General Plan - Chapter 8: Water and Wastewater. Retrieved February 23, 2021, from https://www.slocity.org/home/showdocument?id=25195

Table 17.4 -

S. (n.d.). Single Dry Year Supply and Demand Comparison. Retrieved February 25, 2021, from http://www.slocity.org/home/showdocument?id=10753