

## 4.8 FLOODING and DRAINAGE

*Sediment transported from the site during the construction period has the potential to cause downstream water quality impacts. Implementation of Best Management Practices (BMPs) per the National Pollutant Discharge Elimination System (NPDES) requirements would minimize such effects. Grading during the construction phase of the proposed project may result in discharge of sediments or other pollutants into the surrounding drainage courses. These impacts are considered Class II, significant but mitigable. The northern section of the project site is located within the 100-year flood hazard area associated with the Huerhuero Creek. Due to the intensification of uses proposed on the project site, there is the potential for storm water transport of pollutants, bacteria, and sediment into downstream facilities. With implementation of the proposed drainage improvements, the Specific Plan would result in Class II, potentially significant, but mitigable, impacts related to post-project water quality.*

### 4.8.1 Setting

**a. Topography.** The 826.7-acre site is characterized by rolling terrain with a major north-south trending ridgeline in the central portion of the site. Steeper slopes are present along the flanks of the ridgeline. Canyons and drainages lead up from the lower points of the site, up to the ridgeline. The existing elevations within the central portion of the site range from a high of approximately 1,000 feet along the main ridgeline to 732 feet along the northeast corner of the project site, indicating a maximum relief of about 268 feet.

**b. Regional Drainage.** The Specific Plan Area is located within both the “Templeton to Paso Robles Watershed” and the “Lower Huerhuero Creek Watershed”. The southern 2/3 of the Specific Plan area is within the “Templeton to Paso Robles Watershed” which drains generally to the west through localized natural drainage swales and eventually to the Salinas River. The northern 1/3 of the Specific Plan area is located within the “Lower Huerhuero Creek Watershed” which drains into Huerhuero Creek, a seasonal tributary creek flowing into the Salinas River (refer to Figure 4.8-1).

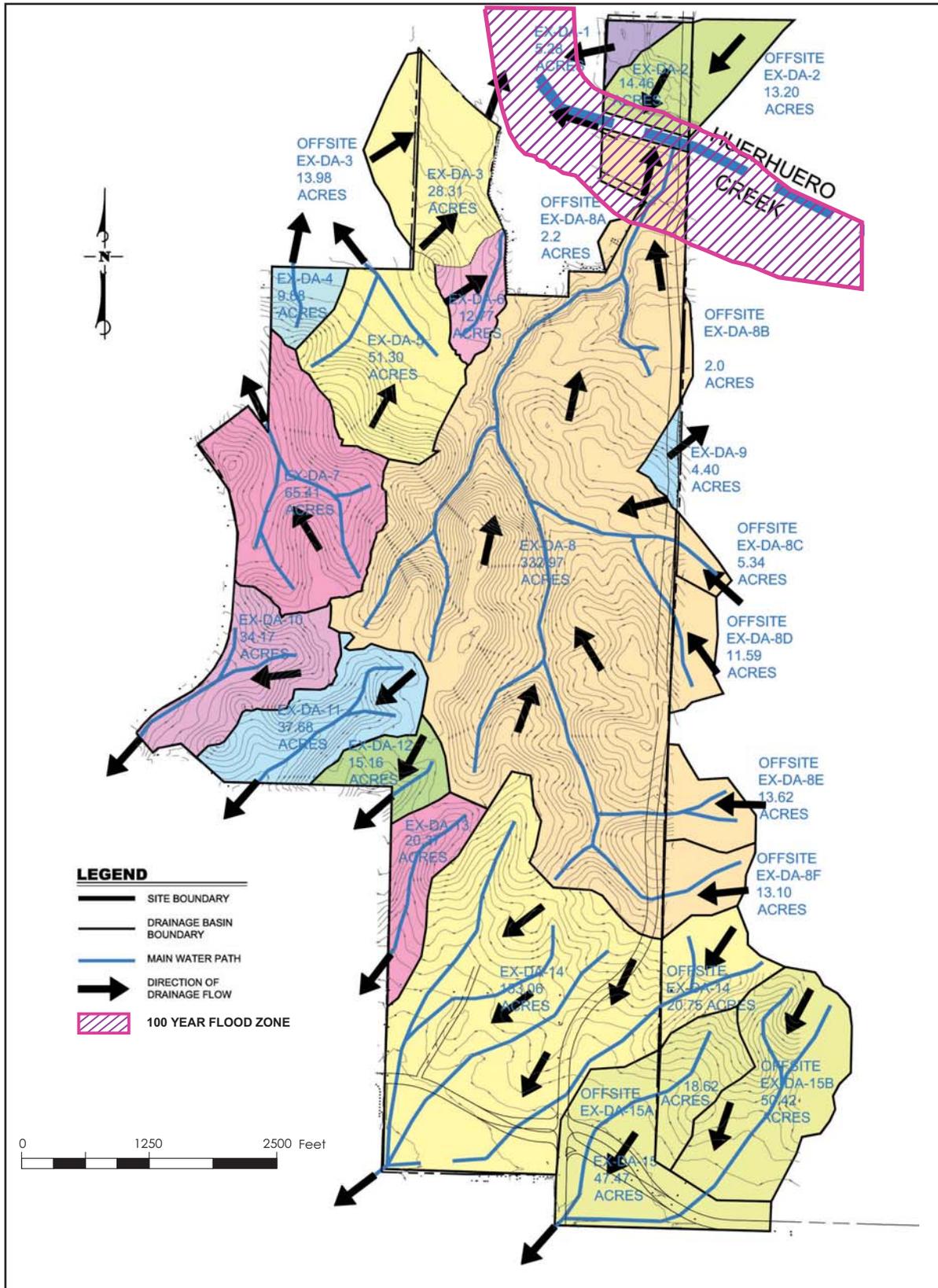
The Specific Plan area can be divided into approximately fifteen watershed subbasins within the two larger watersheds (refer to Figure 4.8-1). The largest watershed subbasin (labeled “EX-DA-8”) consists of 332.97 acres along the eastern boundary of the Specific Plan area. Other than sub-basin EX-DA-14 (153.06 acres), the remaining subbasins within the Specific Plan area are relatively smaller, ranging from 5.28 acres (along the northernmost Specific Plan area boundary) to 65.41 acres (along Golden Hill Road). These remaining watershed subbasins are located along the southern and western site boundaries.

**c. Site Drainage Pattern.** On-site drainages are intermittent streams which flow north and northeast draining into Huerhuero Creek, which is located in the northern section of the site. The rolling hills have slopes ranging from 10 to 30 percent and are drained primarily by sheet flow with some low-lying drainage courses. These rolling hillsides drain primarily by sheet flow into natural grass lined channels. A comparatively small amount of offsite drainage, primarily from the East, influences drainage on the site, and is conveyed through the site along with on-site runoff in existing drainage channels. Surface water runoff from watershed areas within the site generally flow northerly toward Union Road or southerly toward Linne Road and across land adjacent to Creston Road and Sherwood Road (see Figure 4.8-1).



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Existing Drainage  
 Within the Specific Plan Area

Figure 4.8-1  
 City of El Paso de Robles



**d. Existing Flood Hazards.** A small portion of the site is subject to potential flooding from Huerhuero Creek which traverses through the northern section of the site along Union Road. The National Flood Insurance Program's Flood Insurance Rate Map (FIRM) for the project area shows the northern portion of the site within the 100-year flood plain boundary adjacent to the Huerhuero Creek (refer to Figure 4.8-1). The 100-year flood, or "base flood", refers to the flood resulting from a storm event that has a probability of occurring once every 100 years, or a one percent chance of occurring in any given year. Areas mapped in the 100-year floodplain area subject to inundation during a 100-year storm event. The 100-year floodplain was used to designate Huerhuero Creek in the Flood Hazard overlay zone within the City's Land Use Element in the General Plan.

**e. Regulatory Setting.** Ultimate regulatory authority over the project lies with the City of Paso Robles. The City of Paso Robles General Plan provides a policy intended to address impacts associated with flooding and drainage hazards. The General Plan policy is as follows:

**POLICY S-1D: Structural Safety.** Rely on the City's planning and building permit review process to ensure that existing and proposed structures are adequately designed, and to reduce susceptibility to damage from fire, flooding, and geologic hazards.

Additionally, because the project would potentially alter portions of natural drainage channels, several agencies with jurisdiction in such areas would also be involved. These agencies would include the U.S. Army Corps of Engineers (Corps), the California Department of Fish and Game (CDFG), and the Regional Water Quality Control Board (RWQCB).

## 4.8.2 Impact Analysis

### a. Methodology and Significance Thresholds.

1. **Methodology.** The analysis was based on a field reconnaissance, literature review, and discussions with City staff. Drainage facilities must be designed to convey a 25-year frequency event with freeboard. In addition, drainage facilities must be designed such that a 100-year event will not result in flood damage to any proposed structure. Drainage facilities that meet these requirements will provide sufficient mitigation to result in less than significant impacts.

2. **Significance Thresholds.** A project pursuant to the Specific Plan would have a significant effect on the environment if it would cause substantial flooding, erosion or siltation. Flood hazard impacts related to the proposed project would be considered potentially significant if the development pursuant to the Specific Plan would result in buildings located within the FEMA 100-year flood plain or other locally-recognized inundation area, or that such buildings would be subject to flood inundation during the 100-year flow event.

Pursuant to the State CEQA Guidelines, drainage and flooding impacts would be considered significant if the project would:

- *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;*



- Place within a 100-year flood hazard area structures which would impede or redirect flood flows;
- Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam;
- Result in inundation by seiche tsunami or mudflow;
- 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;
- 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 flooding on- or off-site;
- 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;
- Violate any water quality standards or waste discharge requirements;
- Exceed the RWQCB's drinking water MCL of 45 mg/L, the ionized ammonium level at receiving waters exceeds 0.025 mg/L, or when the local regulatory agency determines that discharged nitrogen levels are causing detrimental or significant algal response. The RWQCB does not have MCLs for nitrite or phosphate; and/or
- Otherwise substantially degrade water quality.

#### **b. Project Impacts and Mitigation Measures.**

**Impact FD-1**     **During construction, disrupted soil may be subject to erosion, sedimentation, and pollutant discharges. This is considered a Class II, significant but mitigable impact.**

Construction Impacts. Construction pursuant to the Specific Plan, together with construction of any required storm drainage facilities, could result in the pollution of natural watercourses or underground aquifers. Erosion would be a primary contributor to pollution, from sediment discharge affecting downstream areas. Pollution could also occur from direct construction-related discharges. The types of pollutant discharges that could occur as a result of construction include accidental spillage of fuel and lubricants, and discharge of excess concrete. This is a potentially significant impact.

Regulations under the federal Clean Water Act require that a National Pollutant Discharge Elimination System (NPDES) storm water permit be obtained for projects that would disturb greater than one acre during construction. Development pursuant to the Specific Plan would be subject to this requirement. Acquisition of an NPDES permit is dependent on the preparation of a Storm Water Pollution Prevention Plan (SWPPP) that contains specific actions, termed Best Management Practices (BMPs), to control the discharge of pollutants, including sediment, into the local surface water drainages. In the State of California, Regional Water Quality Control Boards administer the NPDES permit process.

Long-Term Operational Impacts. Commercial and residential uses can generate runoff that could affect downstream water quality. Such developments would be expected to increase the quantities of pollutants potentially entering stream courses with runoff from parking lots and landscaping. Receiving waters would assimilate a limited quantity of each constituent, but beyond certain thresholds the measured amount of the constituent is considered a pollutant.



Major non-point source pollutants include: sediment, nutrients, trace metals, oxygen-demanding substances, bacteria, oil and grease. The most abundant heavy metals in urban stormwater are lead, zinc, and copper, which together account for 90% of the dissolved heavy metals. Heavy metals are generally vehicle related and influenced by traffic volumes.

Urban uses also add soluble compounds from food preparation, cleaning agents, excreta, and industrial processes, as well as irrigation of commercial and residential landscaping.

Subsequent to project implementation, discharge from non-point sources on the project site would be conveyed to stormwater facilities. Stormwater quality is affected by several factors, including: the length of time that has elapsed since the previous precipitation, the volume of precipitation, the types and amounts of urban land uses in the area, and the quantity of transported sediment. The first flush of the storm occurring after the dry-season period generally contains the highest quantities of urban pollutant loads. Proposed landscaped areas are a source of nutrient loading from fertilizers. However, the potential impacts from fertilizer application could be minimized through timing of the application to avoid rainy periods.

Development of the project site with residential and commercial uses would be expected to increase the quantities of pollutants with runoff from streets, lawns, and gardens. Other activities that may increase pollutants due to site development include: motor vehicle operations in the area, pesticide/herbicide/fertilizer uses, human littering, careless material storage and handling, and pavement disintegration.

The Specific Plan proposes to convey drainage via surface flow and closed conduit to detention basins. The detention basins would serve to filter the runoff by routing flows across grassy areas to remove silts and oils from paved streets and other urbanized portions of the site. Nevertheless, water discharged from the detention basins could contain substantial quantities of contaminants, which would be considered a potentially significant impact related to post-construction water quality.

Mitigation Measures. The following mitigation measures address potential impacts related to requirements associated with the discharge of pollutants during project construction.

- FD-1(a)**      **Notice of Intent.** Prior to beginning construction, any applicants pursuant to the Specific Plan shall file a Notice of Intent (NOI) for discharge from the proposed development site.
  
- FD-1(b)**      **Storm Water Pollution Prevention Plan (SWPPP).** Any applicant shall submit a SWPPP to the City prior to issuance of a building permit, in compliance with National Pollutant Discharge Elimination System (NPDES). The contractor is responsible for understanding the State General Permit procedures and instituting the SWPPP during construction. The SWPPP shall include but not be limited to the components listed in Section 4.9, *Biological Resources*, Mitigation Measure B-4(a). The SWPPP must be prepared in accordance with the guidelines adopted by the State Water Resources Control Board (SWRCB). The



SWPPP shall be submitted to the City along with grading/development plans for review and approval.

- FD-1(c) Notice of Completion of Construction.** Any project applicant shall file a notice of completion of construction of the development, identifying that pollution sources were controlled during the construction of the project and implementing a closure SWPPP for the site.

Storm water detention specifications are identified in Specific Plan Policies I-16 and I-17 as well as Mitigation Measure FD-2(a). Policy LU-18 calls for the minimization of erosion and runoff via an Erosion and Sediment Control Plan, the prohibition of non-storm water construction related discharges, BMPs, and other pollutant removal techniques.

Residual Impacts. Implementation of the above mitigation would reduce water quality impacts to less than significant levels.

- Impact FD-2 The project would introduce paved areas and thus has the potential to result in increased peak stormwater discharges and volumes of runoff. Impacts are considered Class II, significant but mitigable.**

Implementation of the Specific Plan as proposed would increase the area covered by impervious surfaces, resulting in potential increases in surface runoff and accelerated erosion. However, the Specific Plan proposes drainage through new on-site storm drains to new on-site detention basins (refer to Figure 2-8 in Section 2.0, Project Description).

Increased runoff could impact water quality down-gradient of the Specific Plan area and by increasing erosion/sedimentation and the quantity of flood water. Runoff from the developed portions of the Specific Plan area would be detained in on-site detention ponds. The implementation of detention ponds would allow the settlement of suspended particles and reduce stormwater runoff rates. However, improperly designed detention basins would result in potentially significant impacts related to peak stormwater discharges and volumes of runoff. As such, impacts related to increased peak stormwater discharges and volumes of runoff as a result of Specific Plan implementation would be significant but mitigable.

Mitigation Measures. The overall increase of storm water runoff volumes associated with future development has been addressed in the proposed Specific Plan. According to the Specific Plan, the following policies and guidelines would help mitigate impacts resulting from the introduction of paved and impervious surfaces.

- **Policy I-16. Drainage Facilities.** *All new development shall be required to provide drainage facilities in accordance with the provisions of the City Municipal Code and consistent with the Drainage Plan in Figure 3-16 (of the Specific Plan) and detention basin summary in Table 3-5 (of the Specific Plan). Drainage easements shall be established as necessary.*
- **Policy I-17. Drainage and Detention Basin Design.** *Detention to mitigate post-development increases in peak run-off will be required. Figure 3-16 and Table 3-5 [of the Specific Plan] show representative detention possibilities and representative basin capacities.*



*Detention basin locations may be cooperatively located by adjacent property owners in order to share a single basin, or each property may develop their own.*

*Detention basins shall be designed in accordance with applicable City standards and current City Practice as directed by the City Engineer. The design must consider the volume of water that the basin is expected to store as well as operation and maintenance of the basins. The detention basins are to have a filtering device on the inflow side to prevent the flow of contaminants and sediments into the basins. Basins shall be designed to meet the following standards:*

- a. Volume: Detention basins shall be sized to provide capacity for a 100-year storm event (minimum) and to meet the outflow requirements listed below.*
- b. Outflow Device: All detention basins are to be designed to be free draining. Terminal basins (i.e., pumped basins) are not allowed. Outlet pipes shall be oversized (18-inch minimum) with an orifice restriction to limit outflow to  $Q_{10}$  pre-development flows or as determined by the City. Orifice restriction plates shall be removable for emergency situations. A removable trash rack shall be provided at the outlet. Current City drainage water quality policy requires that detention basins must be designed to capture summertime (dry season) irrigation run-off and other nuisance water and preclude discharge of this water into natural drainage courses.*
- c. Slopes: Maximum side slopes shall be four horizontal to one vertical on interior slopes and two horizontal to one vertical on exterior slopes. A soils engineering and geotechnical report shall be required for all fill levee sections. The report shall address remedial grading, benching, and slope stability of the level sections.*
- d. Emergency Overflow: An emergency overflow spillway shall be sized for the peak 100-year storm runoff. The spillway shall be engineered and shall be reinforced concrete. The spillway should be designed with a minimum of one foot of freeboard above the 100-year spill water surface elevation.*
- ~~*e. Low Flow Drainage: The bottom of the basin shall have a minimum gradient of 2% draining to the outlet, or a low flow reinforced concrete swale shall be provided with a minimum gradient of 0.5% draining to the basin outlet.*~~
- e. Access Ramp: A maintenance access ramp shall be provided down into the basin in a manner and dimensions acceptable to City staff.*
- f. Locating and Landscaping. The City shall require review and approval of any proposed basin landscape plan. Landscaping shall be selected to minimize maintenance, while minimizing impact to native and sensitive species that could be harmed by invasive plant species. To the extent possible, such facilities shall be placed to avoid removing oak trees, and should not be designed to serve as informal parks. No trees or shrubs shall be planted within 15 feet of the basin outlet. Basins should be located to minimize regulatory compliance issues and where soils are suitable for such facilities or soil must be imported to replace the unsuitable soils. Floating objects such as railroad ties and landscape bark are not permissible.*
- g. Maintenance: Prior to final development approval, the applicant shall either be deeded to the City in fee, or the developer shall enter into a maintenance agreement with the City to assure perpetual maintenance of the basin and related on-site private drainage improvements and to allow the City emergency access. Fences are required if the maximum water depth attainable exceeds 4 feet and the side slopes are steeper than 4 to 1.*
- h. Mosquito Abatement: The City shall require review and approval of detention basins for public safety and mosquito abatement.*



*Developers may request to be able to make up any lost density from using developable land for detention basins through clustering dwelling units.*

*Any applicants under the Specific Plan shall provide an engineered hydrologic analysis and drainage plan for the project, prepared by a qualified engineer, which evaluates the added runoff that would result from site development, in relation to the existing drainage system. The hydrologic analysis shall specify design standards for drainage facilities that would adequately convey storm water runoff under 100-year flood conditions in accordance with City standards. The stormwater conveyance devices shall be sized to accommodate the expected flows, up to a Q25 event with freeboard, and also designed to withstand a Q100 event without damage to any proposed structure.*

*Any future structures planned within the designated 100-year flood zone shall include plans that indicate the construction of floor levels at a minimum of one foot above base flood elevations.*

- ***Policy I-18. Storm Drainage Construction Responsibility.*** *The Specific Plan provides a framework for addressing storm drainage detention requirements. Property owners may reach agreements and propose common facilities to provide equivalent functions. Any changes to the framework presented in the Specific Plan shall be subject to approval of the City Engineer.*

In addition, the following grading techniques would be used in subareas 1 and 2, where the Specific Plan's highest elevations, most varied topography, and greatest number of oak trees are found:

- ***Grading in Subarea 1.*** *Grading shall be consistent with Grading Category A, as described in Specific Plan Policy LU-13. Grading for each lot shall be considered and designed separately from contiguous lots to preserve the topography and aesthetics of the hillside. Grading schemes that would grade contiguous lots together, disrupt natural grades at the property lines, or create flat building pads on slopes greater than 10% shall be avoided. Pad grading will be allowed where the natural terrain within the identified building envelope is less than 10%. Where the natural terrain is greater than 10%, an area of no more than 1,000 sf can be graded for a garage. The remainder of any structure will be constructed to conform to the natural terrain.*

*Driveway widths may be reduced to 12' where necessary to reduce impacts to oak trees as a result of grading or other construction activities. Alternate paving materials will be considered within the CRZ's of native oak trees to further reduce the development impact. In the event that grading or construction activities are necessary within the CRZ of an oak tree, a certified arborist shall be consulted to review the design and provide appropriate mitigation measures for any potential impacts. Cut and fill slopes shall be minimized in an effort to preserve the natural landscape of the area. Where grading is necessary, limit slopes to 3:1 or flatter. Use of slopes steeper than 3:1 shall be allowed only to preserve oak trees. All slopes shall be re-vegetated with native or naturalizing plan material.*

- ***Grading in Subarea 2.*** *For Subarea 2A grading shall be consistent with Grading Category B, as described in Specific Plan Policy LU-13. Grading for each lot shall be considered and*



*designed separately from contiguous lots to preserve the topography and aesthetics of the hillside. Grading schemes that would grade contiguous lots together, disrupt natural grades at the property lines, or create flat building pads on slopes greater than 10% shall be avoided except where feathering of road fills results in a better transition to natural grades. As a part of the tentative map process, it should be demonstrated that all lots provide adequate building space. No oak tree removals will be permitted as a part of the tentative map, grading permit or building permit processes, unless it is consistent with the current Oak Tree Ordinance (i.e. oak trees that are diseased, deceased or pose a hazard too great to mitigate).*

Mass grading techniques used in subareas 3, 6, 7, 8, 9, 10, 11, 12, 13, 14, 16, 17 would alter the terrain, most substantially in the subareas with most varied terrain (3, 6, 7, 8, 9, and 10). Similarly, pad grading techniques used for non-residential development in subareas 4, 5, 14, 15, 18, and 19 would result in similar impacts. Within these areas, lot runoff would be directed to internal streets, along curb and gutters to storm drains and to an appropriate downstream detention basin. A system of storm water detention basins will be integrated into future site development plans to control and mitigate increased post-development peak runoff (refer to Figure 2-8 of Section 2.0, *Project Description*). All proposed storm drain facilities will be consistent with the proposed land uses, and will be based on City standards.

Development within the Specific Plan area would also result in landform alteration, which will, to some degree change existing drainage patterns. Development will produce new impermeable surfaces, increasing peak storm event runoff from these developed areas. The increases in peak runoff will be mitigated with detention basins designed in accordance with City Standards and other current engineering practice. These detention basins will provide for post-development flows to equal pre-development flows for the 10-year storm.

Detention Basin discharges shall be designed to imitate the pre-development flow patterns to avoid additional erosion or other downstream damage.

An estimate of the approximate storage requirements and possible locations of the required detention basins are shown in Table 4.8-1 and Figure 2-8 (Section 2.0, *Project Description*). These estimated storage volumes and basin configuration/locations will be refined during development design. For the purposes of this specific plan, these volumes were calculated using the guidelines in the City of Paso Robles Engineering Division "Standard Details and Specifications." An assumed reasonable storm duration was used to calculate storage volumes. With detention, the post-development runoff from the site (based on a ten year storm) will equal the runoff after development.

Detention basins shall be located, where possible, outside existing natural drainage channels and low-lying areas to avoid the creation of de facto wetlands. Open drainage ditches and channels, outfalls and culverts, shall be designed, landscaped and protected in accordance with City Standards.



**Table 4.8-1. Detention Basin Summary**

Detention Basin No.	Contributory Drainage Area Developed/(Total Acres)	Maximum Allowable Discharge ( $Q_{10\text{-predev}}$ ) (cfs)	Calculated Basin Storage (Acre-ft)
2	9.3 (14.4)	7.2	0.17
3B	20.0 (28.3)	19.4	0.31
4	7.4 (9.9)	7.1	0.06
5	33.3 (51.3)	29.0	0.51
6	9.7 (12.8)	9.5	0.26
7	48.6 (65.4)	48.8	0.56
8A	45.1 (83.6)	45.0	1.04
8B	170.9 (379.8)	161.4	5.30
8C	16.3 (34.2)	14.6	0.89
10	25.4 (34.2)	25.4	0.24
11	28.0 (37.7)	26.2	0.48
12	11.1 (15.2)	11.1	0.14
13	17.0 (20.4)	16.9	0.16
14A	36.7 (80.4)	34.6	1.53
14B	7.9 (26.3)	7.8	0.67
14C	29.8 (44.1)	26.2	0.76
14D	20.6 (28.7)	20.6	0.21
15A	16.9 (26.6)	16.9	0.19
15B	34.1 (64.5)	34.1	0.50
15C	4.1(12.4)	4.0	0.29

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3B	28.3	20.0	0.31
4	9.9	7.4	0.06
5	51.3	33.3	0.51
6	12.8	9.7	0.26
7	65.4	48.6	0.56
8A	83.6	45.1	1.04
8B	379.8	170.9	5.30
8C	34.2	16.3	0.89
10	34.2	25.4	0.24
11	37.7	28.0	0.48
12	15.2	11.1	0.14
13	20.4	17.0	0.16
14A	80.4	36.7	1.53
14B	26.3	7.9	0.67
14C	44.1	29.8	0.76
14D	28.7	20.6	0.21
15A	26.6	16.9	0.19
15B	64.5	34.1	0.50
15C	12.4	4.1	0.29

In addition to the proposed Specific Plan policies and guidelines listed above, the following mitigation measures are required of individual developers within the Specific Plan area to mitigate impacts from increased stormwater discharges to a less than significant level.



**FD-2(a) Drainage Facilities.** All runoff water from paved impervious areas (e.g., parking lots, streets, etc.) shall be conveyed by impervious conduits via energy dissipaters to existing drainage channels. In addition, drainage shall be consistent with approved drainage plans that include the following:

- a. Locations of all proposed pipelines;
- b. Pipe diameters;
- c. Locations where the pipe(s) would surface in nearby drainage features; and
- d. Amount of water that would flow from each pipeline.

**Plan Requirements and Timing:** A drainage plan which incorporates the above and includes a maintenance and inspection program to ensure proper functioning shall be submitted by individual project applicants prior to occupancy/operation clearance to the Community Development and Public Works Department for review and approval.

**Monitoring:** Prior to site grading for all individual structures, plans will be reviewed by the Planning Department for consistency with the City's grading requirements, proposed mitigation measures, and the Uniform Building Code (UBC) pertaining to cut and fill.

**Residual Impacts.** With implementation of the properly designed storm drains and detention basins within flood control easements, in accordance with City standards, Specific Plan policies, and standard City practice, flooding impacts would be less than significant. Additionally, development of the proposed facilities would reduce peak discharge associated with a 100-year storm event. Following implementation of these measures, the project would result in less than significant impacts related to peak stormwater discharges and volumes of runoff.

**Impact FD-3 Portions of Subareas 18 and 19 of the proposed Specific Plan are located within a 100-Year flood hazard area associated with Huerhuero Creek. Impacts related to flood hazard exposure to potential commercial uses in this area are considered Class II, significant but mitigable.**

Portions of the Specific Plan area adjacent to Huerhuero Creek are within the 100-year flood zone as identified by FEMA (refer to Figure 4.8-1. The portion of the proposed Specific Plan area within the 100-year flood zone is completely contained north of Union Road, within subareas 18 and 19. These areas are proposed for commercial land uses and would not include residential development. Development would increase the impermeable surface of the proposed Specific Plan area compared to current conditions.

Future commercial development in subareas 18 and 19 would add impervious surfaces such as commercial structures, parking lots, walkways, and other paved areas to the site. These surfaces would increase the amount of runoff following storm events. However, due to existing, moderately clayey (relatively impervious) soil conditions and agricultural land use, the conversion of existing land use to the proposed development alone would have minimal



impacts on downstream flood water surface elevations and peak flow rates. Impacts would be considered potentially significant unless mitigated.

Mitigation Measures. The Specific Plan includes provisions for onsite detention basins, and standards associated with flood control, as articulated in Impact FD-2. In addition to these and other City standards and practices, the following mitigation measures are required to reduce project impacts related to exposure to flood hazards.

**FD-3(a) Conditional Letter of Map Revision (CLOMR).** Without obtaining a Conditional Letter of Map Revision (CLOMR) from the Federal Emergency Management Agency (FEMA), development within the portions of subareas 18 and 19 within the 100-year flood plain would not be guaranteed to comply with the National Floodplain Insurance Program (NFIP) requirement that a parcel of land or proposed structure that is to be elevated by fill would not be inundated by the base flood. Prior to approval of grading permits, the applicant shall obtain a CLOMR from FEMA.

The CLOMR request shall include detailed flood hazard analyses prepared by a qualified professional engineer, consistent with FEMA requirements. The applicant shall comply with all conditions and requirements of the CLOMR.

**Plan Requirements and Timing:** Applicants within subareas 18 and 19 shall submit a copy of the CLOMR prior to issuance of grading permits for the portions of those areas within the 100-year flood plain.

**Monitoring:** Community Development Department and Public Works Department shall review the CLOMR documentation prior to approval of improvement plans for tract grading.

**FD-3(b) Prohibition of Floodwater Displacement.** Prior to issuance of grading permits, applicants within subareas 18 and 19 shall submit plans to the Community Development Department and Public Works Department that identify an overland escape route for runoff to ensure that the placement of fill on the project site to raise the proposed building pads out of the floodplain will not divert runoff onto adjacent properties.

**Plan Requirements and Timing:** Applicants within subareas 18 and 19 shall submit plans prior to issuance of grading permits. **Monitoring:** Community Development Department and Public Works Department shall review the plans prior to approval of improvement plans for tract grading.

Residual Impacts. Implementation of the above mitigation, in conjunction with City standards and practices, would reduce flooding impacts associated with future development in subareas 18 and 19 to less than significant levels.



**Impact FD-4 Under the proposed Specific Plan, much of the site would include urban development which would replace agricultural uses. This would change runoff characteristics within existing drainage areas from untreated agricultural runoff to treated urban runoff. This is considered a Class IV *beneficial* impact.**

Currently, there are no regulations regarding onsite runoff associated with animal waste from grazing activities. Agricultural use on the site could involve the application of pesticides and other chemicals. Storm runoff from the site recharges groundwater and also discharges into Huerhuero Creek and eventually into the Salinas River. The construction of the commercial and residential Specific Plan components would include detention basins and storm water pollution prevention methods described in the Specific Plan and Impacts FD-1 and FD-2. This change from untreated agricultural runoff to treated urban runoff would increase the quality of runoff that discharges into groundwater and Huerhuero Creek relative to existing conditions that include ongoing agricultural operations.

Mitigation Measures. No mitigation measures are required for this beneficial impact.

Residual Impacts. Impacts from the proposed project development are potentially beneficial to water quality in the Templeton to Paso Robles Watershed and the Lower Huerhuero Creek Watershed.

**c. Cumulative Impacts.** Cumulative development under the General Plan would alter landforms in the City and would expose new residents and property to hazards from erosion and sedimentation that exist in the area. Development under the Specific Plan would contribute to these cumulative impacts. However, grading and associated erosion issues would be addressed on a case-by-case basis to mitigate impacts resulting from individual projects.

Cumulative development would increase overall activity levels in the area, with potential increases in sedimentation and concentration of contaminants such as oil, grease, and solvents in surface runoff that are discharged to local waterways, including Huerhuero Creek, and local groundwater. However, all development on sites of over one acre would be subject to NPDES permit requirements pertaining to construction activity while all development in the City would be subject to various City requirements pertaining to controlling erosion and preserving water quality. These standard requirements would be expected to reduce cumulative impacts to water quality to a less than significant level.

All development would have the potential to result in an increase in impervious surface area, thereby increasing peak storm runoff in the area. The proposed project may incrementally contribute to this increase. However, the installation of properly designed retention/siltation basins would reduce peak storm flows. Moreover, all development proposals would be required to upgrade stormwater infrastructure as needed. Thus, with implementation of required improvements, cumulative impacts pertaining to flooding and drainage are anticipated to be less than significant.

