

CEQA ADDENDUM

Initial Study/Mitigated Negative Declaration

SCH No. 2016-061-050

Paso Commons Planned Development

Assessor Parcel Numbers: 025-425-016, 025-425-019, 025-425-020, 025-425-021, 025-425-022,
025-425-023, 025-425-024, 025-425-025, 025-425-026, 025-425-027, 025-425-028, and
025-425-029

Location: Wisteria Lane
Paso Robles, CA

Planned Development (PD21-13)
Tentative Lot Line Adjustment (PRAL21-0054)
Tree Removal Permit (OTR 21-24)

Applicant:

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I. INTRODUCTION

A. Determination

The City of Paso Robles is processing an application for Paso Commons Planned Development, a business park proposed on vacant land on Wisteria Lane in northern Paso Robles (“Project”). The City has previously approved development and land use plans and zoning changes for the Project area to permit this type of development in the proposed location.

This document constitutes an Addendum to the August 2016 Mitigated Negative Declaration (MND or 2016 MND) prepared for the Erskine-Justin General Plan Amendment (GPA 14-001, REZONE 14-001, VESTING TENTATIVE TRACT MAP 3069, OAK TREE REMOVAL 14-010). This Addendum evaluates whether the Project would result in any new or substantially more adverse significant effects or require any new or modified mitigation measures as compared to the 2016 MND.

As lead agency, and as part of the City’s due diligence, the City required an updated Traffic Impact Study and Air Quality and Greenhouse Gas Emissions Analysis to determine if the Project would result in any new or more severe significant effects not identified in the MND. Based on these studies, and a full analysis of the scope of the Project, and the previously adopted 2016 MND, none of the criteria specified in CEQA Guidelines section 15162 requiring a subsequent or supplemental environmental document to be prepared is triggered. In particular, there have been no: (1) substantial changes in the project that will require major revisions to the previous MND due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effect; (2) substantial changes with respect to the circumstances under which the Project is undertaken that will require major revisions to the previous MND due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effect; and (3) new information of substantial importance that was not known and could not have been known at the time the previous MND was adopted that shows: (a) the Project would have significant effects not discussed in the previous MND; (b) the Project would have more severe environmental effects; or (3) mitigation measures previously found to be infeasible or new mitigation measures now exist and would be feasible and would reduce significant effects. Therefore, an addendum is the appropriate document under CEQA to analyze the consistency of the Project with the type and intensity of development previously analyzed for the site in the MND as provided for in CEQA Guidelines section 15162 and 15164.

This Addendum incorporates the mitigation measures detailed in the MND. The incorporation of these measures ensures that previously adopted mitigation will be implemented for the Project and that no significant impacts will result from the Project and no new or increased significant impacts will result from the Project. No new or modified mitigation is available, and all impacts will be reduced to a less-than-significant level with the existing mitigation measures.

B. Background

The Project site involves development of a business park on 12 adjacent parcels:

- APN 025-425-016
- APN 025-425-019
- APN 025-425-020
- APN 025-425-021
- APN 025-425-022
- APN 025-425-023
- APN 025-425-024
- APN 025-425-025
- APN 025-425-026
- APN 025-425-027
- APN 025-425-028
- APN 025-425-029

On August 2, 2016, the City adopted a Mitigated Negative Declaration and rezoned five parcels (APNs 025-425-025, 025-425-026, 025-425-027, 025-425-028, and 025-425-029) to Planned Industrial and Commercial Light Industrial in conjunction with approval of a general plan amendment and Tentative Tract 3069. The subdivision was approved with specific conditions of approval and accompanying mitigation measures, which have been incorporated into the Addendum.

The remainder of the Project site and surrounding area has also been previously evaluated for development of a business park. Prior environmental documents providing information relevant to this Addendum are described below and incorporated herein by reference. These documents are available for review at the City offices.

- On January 13, 1998, the City adopted a Negative Declaration and approved Tentative Tract 2269 and Planned Development 97-013. (Resolution No. 98-001.) Tentative Tract 2269 subdivided an approximately 74-acre site into 21 industrial lots creating, as relevant here, APNs 025-425-016 and 025-425-019, for development of a business park. Planned Development 97-013 established design standards for the future business park.
- On April 25, 2006, the City adopted a Mitigated Negative Declaration and approved Tentative Tract 2778 to subdivide a 47-acre property into 20 lots for development of a business park. Nineteen acres of the 47-acre property were part of the previously approved business park (Tract 2269). (Resolution No. 06-027.) This action created APNs 025-425-020, 025-425-021, 025-425-022, 025-425-023, 025-425-025 025-425-029.

Each of these subdivisions was approved with specific conditions of approval and accompanying mitigation measures. Additionally, the Environmental Impact Report for the City's updated Circulation and Land Use Elements in 2003 fully evaluated the impacts of business park uses in Tentative Tract 2269 and is also incorporated herein by reference.

The Project applicant is now seeking the following entitlements to allow for construction of a commercial business park complex consistent with the 2016 MND, related CEQA documents, and the City's General Plan:

- Planned Development
- Tentative Lot Line Adjustment
- Tree Removal

C. Addendum Purpose

The purpose of this Addendum is to analyze the consistency of the Project with the type and intensity of uses previously analyzed for the site in the 2016 MND and related environmental documents. As documented in this Addendum, none of the conditions stated in CEQA Guidelines section 15162 have been met and therefore there is no need for a subsequent environmental impact report. This Addendum, together with the MND, and those previous environmental documents incorporated by reference, will be relied on by the City when considering approval of the Project.

This Addendum has been prepared to comply with CEQA Guidelines section 15164 and Public Resources Code sections 21083 and 21166.¹ The Addendum uses an environmental checklist to evaluate each environmental topic area within Appendix G of the CEQA Guidelines. This Addendum applies to the current action only; any future development proposals for remaining parcels in Tract 2269, Tract 2778, Tract 3069 that are not part of the proposed Project will be subject to their own consistency determinations and potential subsequent CEQA review.

D. CEQA Framework for Addendum

CEQA Guidelines sections 15162 and 15164 provide that an addendum to an adopted MND may be prepared when the conditions for subsequent or supplemental review are not present. (CEQA Guidelines, § 15164.)² Subsequent or supplemental review is only required when substantial changes to a project require major revisions of a previous environmental document due to new or increased substantial environmental impacts, or where new information of substantial importance has been uncovered that indicates the project would create new impacts or increase the severity of existing impacts. (CEQA Guidelines, §§ 15162, subd. (a), 15164, subd. (b).)

Subsequent environmental review is only necessary if one or more of the following has occurred:

- Substantial changes are proposed for the project that will require major revision of a previous Negative Declaration due to the involvement of new, significant environmental effects or a substantial increase in the severity of previously identified effects;

¹ / See *Save Our Heritage Organisation v. City of San Diego* (2018) 28 Cal.App.5th 656, 668.

² / When project changes “[do] not raise any new effects which the [MND] had not already reviewed and analyzed” then preparation of a subsequent environmental document is not warranted. (*River Valley Preservation Project v. Metropolitan Transit Development Bd.* (1995) 37 Cal.App.4th 154, 177; see also *Santa Teresa Citizen Action Group v. City of San Jose* (2003) 114 Cal.App.4th 689, 704.)

- Substantial changes with respect to the circumstances under which the project is undertaken, requiring major revision to a previous Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified ones;
- New information of substantial importance that was not known or could not have been known without the exercise of reasonable diligence at the time the previous Negative Declaration was adopted shows any of the following:
 - The project will have one or more significant effects not discussed in the previous Negative Declaration.
 - Significant effects previously examined will be substantially more severe than disclosed in the previous Negative Declaration.
 - Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt them.
 - Mitigation measures or alternatives that are considerably different from those analyzed in the previous document would substantially reduce one or more significant effects, but the project proponents decline to adopt the measures or alternative.

II. PROJECT DESCRIPTION

The Project is a business park proposed on vacant land on Wisteria Lane in northern Paso Robles within the Golden Hills/Wisteria Lane business community. The Project site is currently vacant and located adjacent to existing commercial development to the south. The 22.17-acre Project site consists of 12 parcels:

- | | |
|-------------------|-------------------|
| • APN 025-425-016 | • APN 025-425-024 |
| • APN 025-425-019 | • APN 025-425-025 |
| • APN 025-425-020 | • APN 025-425-026 |
| • APN 025-425-021 | • APN 025-425-027 |
| • APN 025-425-022 | • APN 025-425-028 |
| • APN 025-425-023 | • APN 025-425-029 |

The requested land use approvals and entitlements for the Project include: (1) a Planned Development; (2) tentative lot line adjustment map; and (3) authorization for removal of one tree.

The Project includes the following components:

BLDG. NO.	ZONE	PARCEL (ACRES)	USE	SQUARE FOOTAGE *±/USE	TOTAL SF
1	PM	2.75	Warehouse/Office	48,300/ 3,000	51,300
2	PM	2.54	Warehouse/Office	41,626/ 3,000	44,626
3	PM	5.85	Warehouse/Office	120,144/ 4,000	124,144
4	PM	5.50	Warehouse/Office	115,664/ 4,000	119,664
5	C3 PD	1.93	Warehouse/Office	27,400/ 3,000	30,400
6	C3 PD	2.03	Warehouse/Office	25,900/ 3,000	28,900
7	C3 PD	1.57	Warehouse\Office	18,300/ 3,000	21,300
TOTALS		22.17		397,334 / 23,000	420,334

Note: All buildings are one-story. Building 3 and 4 include office mezzanines areas. Parcel sizes reflect the requested Lot Line Adjustment.

Other components of the Project include construction of parking, integral loading docks, security fencing and gates, solid waste enclosures, new wet/dry utilities, stormwater facilities, and patios and landscaping. None of the proposed warehouse/office uses are cold storage uses.

Additionally, the Project will incorporate a number of actions designed to reduce greenhouse gas emissions consistent with the City’s Climate Action Plan as follows:

- LED fixtures will be used throughout the Project.
- All buildings will be “solar ready”
- EV ready parking spaces will be provided pursuant to the California Green Building Code
- Shaded exterior patio areas for employee and customer use will be provided
- Inclusion of internal pedestrian connectivity
- Inclusion of trash enclosures/waste receptacles for solid waste, recyclables, and organic waste

The Project involves construction of seven buildings located on separate legal parcels that each include the required parking area for that particular building. Each building development will consist of on-site improvements and installation of new ingress/egress. Shared access related to Building 3 and 4 and Buildings 5–7 will be constructed based upon the ultimate construction sequence.

The layout of the business park is designed with consideration for Wisteria Lane as the public street and primary access to the Project. Parking is located along the front and side of the buildings with loading areas and trash enclosures located at the interior or rear of the buildings. Buildings 3 and 5 include a gated area for secured loading and outdoor operational staging.

The sequence of construction of the buildings will be based on market demand and tenant considerations.

III. CONSISTENCY DETERMINATION

The entire Project site has been previously analyzed under CEQA for the development of a business park. As noted above, the previously approved Tracts 2269 and 2278 along with the rezone associated with Tract 3069 created the subject lots and current zoning. The environmental determinations for these tracts included environmental review in accordance with CEQA resulting in three MNDs that analyzed the development of portions of the Project site and addressed the anticipated development of these parcels as a business park.

The 1998 and 2006 MNDs adopted for Tract 2269 and Tract 2778, respectively, addressed potentially significant environmental impacts and established development standards for the anticipated development of planned industrial and business park uses like the Project. Additionally, the 2016 MND adopted was to rezone APNs 025-425-025, 025-425-026, 025-425-027, 025-425-028, 025-425-029 included approval of a Planned Development overlay. Mitigation measures for the 2016 MND addressed both the original subdivision project components as well as those applicable to future development on these parcels, including the Project.

The Project is to process a Development Plan (PD), lot merger and oak removal permit to establish the site planning and architectural components necessary to establish the seven new industrial/office buildings. The Project is consistent with applicable regulations including the City's zoning regulations, the existing tract approvals and associated environmental review, and the Paso Robles Municipal Airport Land Use Plan. Because development of business park uses on the parcels in the Project site have been fully evaluated through the 2016 MND and related CEQA documents, the Project would have no new significant effects and, with adoption of the conditions of approval and mitigation measures previously identified in conjunction with the 2016 MND any significant effects previously identified would be mitigated to a less-than-significant level.

IV. ENVIRONMENTAL ANALYSIS

A. Description of Environmental Checklist

The checklist includes the full range of environmental issues presented in the most recent version of Appendix G of the CEQA Guidelines. After adoption of the MND, CEQA Guidelines underwent a comprehensive update, effective December 28, 2018.³ Although not required,⁴ the

³ See Senate Bill 743 (2018).

⁴ See *Cleveland National Forest Foundation v. San Diego Assn. of Governments* (2017) 17 Cal.App.5th 413, 426 ["once an EIR is finally approved, a court generally cannot ... compel an agency to perform further environmental review if new regulations or guidelines for evaluating the project's impacts are adopted in the future"]; *Citizens Against Airport Pollution v. City of San Jose* (2014) 227 Cal.App.4th 788, 808 [CEQA Guidelines enacted after an EIR is certified are not "new information within the meaning of Public Resources Code section 21166, subdivision (c)" and therefore do not trigger preparation of subsequent environmental review nor require consideration in an addendum].

checklist categories in this Addendum follow the updated Appendix G of the CEQA Guidelines in order to provide the most updated information to decisionmakers.⁵ Pursuant to CEQA Guidelines section 15162, this checklist evaluates environmental topics in terms of any “changed condition” (i.e., changed circumstances, project changes, or new information of substantial importance) that may result in a different environmental impact significance conclusion than that reached in the MND. If the situations described in CEQA Guidelines section 15162 are not present, then no subsequent EIR or initial study/negative declaration is required, and an addendum is the appropriate CEQA document.

The column headings in the checklist have been modified from the Appendix G version to assess whether the conditions described in CEQA Guidelines section 15162 are present. The checklist offers the following: (1) identification of the earlier analyses and where they are available in prior document(s) for review; (2) discusses whether proposed deviations from the previously analyzed program would involve new or substantially more severe significant impacts; (3) discusses whether new circumstances surrounding the previously-analyzed program would involve new or substantially more severe significant impacts; (4) discusses any substantially important new information requiring new analysis; and (5) describes the mitigation measures that were incorporated from the prior document(s) and the extent to which they address any site specific conditions for the Project. (CEQA Guidelines, § 15162, subdivision (a).) Each column is described in more detail below. The issue-area checklists are followed by a discussion that explains the results and provides site-specific analysis as warranted.

1. Where Was Impact Analyzed in 2016 MND?

This column provides a cross-reference to the pages of the 2016 MND where information and analysis may be found relative to the environmental issue at hand.

2. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Pursuant to CEQA Guidelines section 15162, subdivision (a)(1), this column indicates whether proposed changes (if any) represented by the Project will result in new significant impacts not disclosed in the 2016 MND or that the Project will result in substantial increases in the severity of previously identified significant impact. A “yes” answer is only required if such new or worsened significant impact will require “major revisions of the previous EIR or negative declaration.” If a “yes” answer is given, additional mitigation measures or alternatives may be needed. Conversely, a “no” answer does not mean that there are no potential impacts relative to the environmental issues, but only that there is no change in the condition or status of the impact since it was analyzed and addressed with mitigation measures in the prior approved environmental documents.

⁵ See Public Resources Code sections 21002.1, subdivision (e), 210065; CEQA Guidelines, §§ 15002, subdivision (a)(1), 15003, subdivision (c).

3. Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?

Pursuant to CEQA Guidelines section 15162, subdivision (a)(2), this column indicates whether changed circumstances affecting the Project will result in new significant impacts not disclosed in the 2016 MND or will result in substantial increases in the severity of previously identified significant impacts. A “yes” answer is only required if such new or worsened significant impacts will require “major revisions of the previous EIR or negative declaration.” A “yes” answer is only required if such new or worsened significant impacts will require “major revisions of the previous EIR or negative declaration.” If a “yes” answer is given, additional mitigation measures or alternatives may be needed. Conversely, a “no” answer does not mean that there are no potential impacts relative to the environmental issue, but only that there is no change in the condition or status of the impact since it was analyzed and addressed with mitigation measures in the prior approved environmental documents.

4. Any New Information of Substantial Importance Requiring New Analysis or Verification?

Pursuant to CEQA Guidelines section 15162, subdivision (a)(3), this column indicates whether new information “of substantial importance” is available requiring an update to the analysis of the 2016 MND to verify that the environmental conclusions and mitigations remain valid. Any such information is only relevant if it “was not known and could not have been known with reasonable diligence at the time of the previous EIR.” To be relevant in this context, such new information must show one or more of the following:

- (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
- (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR or negative declaration;
- (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
- (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR or negative declaration would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measures or alternative.

This category of new information may apply to any new regulations enacted after certification of the prior EIR or adoption of the prior negative declaration, which might change the nature of analysis of impacts or the specifications of a mitigation measure. If the new information shows the existence of new significant effects or significant effects that are substantially more severe than were previously disclosed, then new mitigation measures should be considered. If the new information shows that previously rejected mitigation measures or alternatives are now feasible, such measures or alternatives should be considered anew. If the new information shows the existence of mitigation measures or alternatives that are (i)

considerably different from those included in the prior EIR or negative declaration, (ii) able to substantially reduce one or more significant effects, and (iii) unacceptable to the project proponents, then such mitigation measures or alternatives should also be considered.

5. What Prior Environmental Document's Mitigation Measures Address Impacts

Pursuant to Public Resources Code section 21083.3, this column indicates whether the 2016 MND and/or the findings adopted by the lead agency provides mitigation measures to address effects in the related impact category. In some cases, the mitigation measures have already been implemented. A "yes" response will be provided in either instance. If "n/a" is indicated, this environmental review concludes that the impact does not occur with this Project and therefore no mitigation is needed.

B. Checklist and Discussion

Environmental Issue Area	Where Was Impact Analyzed in the MND?	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance Requiring New Analysis or Verification?	What MND MMs Address Impacts?
1. AESTHETICS. Would the Project:	MND, p. 6				
a. Have a substantial adverse effect on a scenic vista?	MND, p. 6	No	No	No	None required
b. Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	MND, p. 6	No	No	No	None required
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	MND, p. 6	No	No	No	None required
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	MND, p. 6	No	No	No	None required
<p>Discussion: The MND concluded that the installation of new roads and infrastructure associated with development of a business park would not result in a substantial impact on scenic resources. It further noted that future development would be subject to the development plan (PD) process which will require the submittal of architectural, grading & drainage, and landscape plans. (MND, p. 6.) The PD process would ensure that each individual lot is developed in a manner that does not degrade existing visual character or quality. The MND further concluded that impacts as a result of light glare would be less than significant because light fixtures would be evaluated with future development to ensure that they comply with the City’s requirements for light shielding and would be downcast to not shed light on adjacent property. (MND, p. 6.) The pages indicated in the table above contain the relevant analysis.</p> <p>The Project site has been previously graded but is currently vacant. It is located adjacent to existing commercial development to the south. Development also exists across Wisteria Lane to the north. The Project does not involve any element that might result in a new significant or substantially more severe impacts to aesthetics. The Project is subject to the PD process as contemplated in the MND. The proposed building layout locates the dock yards away from public view and the dock yards are generally located on the south for small buildings and to the east/west for the larger buildings. Screen walls will be provided to match the building design in order to properly obscure the line of sight of the dock yard from public view. Approval of the PD requires the Planning Commission to make specific findings, including that the Project would not have an adverse effect on public views from nearby roadways and other public vantage points and that the design and intensity of the Project would not be a disharmonious or disruptive element of the neighborhood. Consistent with the MND, the PD process would ensure that the Project is developed in a manner that does not degrade existing visual character and quality. With respect to lighting, the Project must comply with Policy LU-2d, Action Item 5 (Light/Glare – New Development), which requires all new lights to be shielded and directed downward All exterior lighting shall meet or exceed the standards of the California Green Building Code for maximum allowable backlight, uplight, and glare ratings. Any impacts to aesthetics that may occur as a result of the Project would be within the scope of those discussed in the MND. Furthermore, There are no new circumstances or new information that might result in new significant or substantially more severe impacts to aesthetics as it relates to the Project.</p> <p>Conclusion: The Project would not have any new significant or substantially more severe impacts to aesthetic resources (CEQA Guidelines § 15162(a)).</p>					
2. AGRICULTURE AND FOREST RESOURCES. Would the project:	MND, pp. 7-8				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	MND, p. 7	No	No	No	None required
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	MND, p. 7	No	No	No	None required

Environmental Issue Area	Where Was Impact Analyzed in the MND?	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance Requiring New Analysis or Verification?	What MND MMs Address Impacts?
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	MND, p. 7	No	No	No	None required
d. Result in the loss of forest land or conversion of forest land to non-forest use?	MND, p. 7	No	No	No	None required
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	MND, p. 7	No	No	No	None required
<p>Discussion: The MND concluded that impacts to agriculture and forest resources would be less than significant. Development consistent with the General Plan Amendment and Rezone would not convert prime, unique, or farmland of Statewide importance to other uses. As the prior zoning allowed for non-agricultural uses, impacts related to a change in zoning to commercial and industrial would be less than significant. The 2016 MND further establishes that there are no forest resources within the City. The pages indicated in the table above contain the relevant analysis.</p> <p>The Project site has been previously graded but is currently vacant. It is zoned for Planned Industrial and Commercial Light Industrial uses. The Project does not involve any element that might result in a new significant or substantially more severe impacts to agriculture and forest resources. The Project is consistent with the existing land use and zoning designations. Any impacts to agriculture that may occur as a result of the Project would be within the scope of those discussed in the MND. This project consists of development of existing infill lots within an existing business park. There are no new circumstances or new information that might result in new significant or substantially more severe impacts to agriculture and forest resources as it relates to the Project.</p> <p>Conclusion: The Project would not have any new significant or substantially more severe impacts to agriculture and forest resources (CEQA Guidelines § 15162(a)).</p>					
3. AIR QUALITY. Would the project:	MND, pp. 8-9				
a. Conflict with or obstruct implementation of the applicable air quality plan?	MND, pp. 8-9	No	No	No	None required
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	MND, pp. 8-9	No	No	No	MM AQ-1
c. Expose sensitive receptors to substantial pollutant concentrations?	MND, pp. 8-9	No	No	No	None required
d. Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?	MND, pp. 8-9	No	No	No	None required
<p>Discussion: The MND includes MM AQ-1 which requires future development to be evaluated to determine if there will be potential future project-related air quality impacts with respect to a violation of any air quality standard. The pages indicated in the table above contain the relevant analysis.</p> <p>In accordance with MM AQ-1, an air quality analysis was completed for the Project. (Paso Robles Paso Commons CEQA Addendum Air Quality and Greenhouse Gas Emissions Technical Memorandum.) With respect to construction emissions, the analysis conservatively assumes that construction of all seven buildings and associated infrastructure would be constructed at the same time. Since each building is, however, a stand-alone project, the applicant does not anticipate typical project phasing. The sequence of construction of the buildings will be based on market demand and tenanting considerations.</p>					

Environmental Issue Area	Where Was Impact Analyzed in the MND?	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance Requiring New Analysis or Verification?	What MND MMs Address Impacts?
<p>Construction Emissions: In accordance with San Luis Obispo County Air Pollution Control District (SLOAPCD) Guidance, maximum daily and quarterly construction emissions were quantified CalEEMod version 2020.4 and compared to the applicable SLOAPCD construction thresholds of significance. Project construction emissions would be below applicable SLOAPCD significance thresholds and would therefore be less than significant. Construction equipment will meet all California emissions standards. The applicant has further committed to using Low-ROG (or VOC) content paint for building interiors and exteriors (50 g/L or less), which shall be a condition of approval for the Project.</p> <p>Operational Emissions: In accordance with San Luis Obispo County Air Pollution Control District (SLOAPCD) Guidance, maximum daily and quarterly construction emissions were quantified CalEEMod version 2020.4 and compared to the applicable SLOAPCD operational thresholds of significance. Project operational emissions would be below SLOAPCD significance thresholds with the exception of maximum daily ozone precursor emissions (ROG+NOx or PM₁₀). With respect to ozone precursor emissions, the Project would emit 29.33 lbs/day, which exceeds the SLOAPCD significance threshold of 25 lbs/day. This would be a significant impact if not mitigated. The <i>Clarification Memorandum for the SLOAPCD's 2012 CEQA Air Quality Handbook</i> (2017) provides that projects with the potential to generate at least 25 but less than 30 lbs/day of ozone precursor emissions, like the Project, should select and implement at least four measures from the SLOAPCD's Mitigation Measures (Table 3-5 of the <i>Clarification Memorandum for the SLOAPCD's 2012 CEQA Air Quality Handbook</i>). To reduce operational air quality impacts to a less-than-significant level, MM AQ-2 has been formulated consistent with recommended SLOAPCD's Mitigation Measures. With implementation of MM AQ-2, operational air quality impacts would be less than significant.</p> <p>MM AQ-2. The applicant will do the following:</p> <ul style="list-style-type: none"> • Ensure the Project exceeds Cal Green standards by 25% by providing on-site bicycle parking, short-term and long-term bicycle racks and lockers, or a locked room with standard racks and access to limited bicyclists only. • Work with SLO Regional Rideshare to educate occupants with alternative transportation and smart commute information (e.g., transportation board, electronic kiosk, new hire packets, web portal, newsletters, social media, etc.) • Implement programs to reduce employee vehicle miles traveled (e.g., incentives, SLO Regional Rideshare trip reduction program, vanpools, onsite employee housing, alternative schedules, such as 9-80s, 4-10s, telecommuting, satellite work sites, etc.) • Implement a “no idling” vehicle program which includes signage and enforcement. • Provide shade over 50 percent of parking spaces to reduce evaporative emissions from parked vehicles <p>Mitigation Measures:</p> <ul style="list-style-type: none"> • MM AQ-1 (completed) • MM AQ-2 <p>Conclusion: Air quality impacts associated with construction of the Project are less than significant. With the implementation of MM AQ-2, operational air emissions associated with the Project would also be less than significant. Accordingly, with the implementation of MM AQ-2, the Project would not have any new significant or substantially more severe impacts to air quality (CEQA Guidelines, § 15162(a)).</p>					
4. BIOLOGICAL RESOURCES. Would the project:	MND, pp. 9-12				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	MND, p. 9	No	No	No	MMs BR-1 through BR-27
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	MND, p. 10	No	No	No	MMs BR-1 through BR-10
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	MND, p. 11	No	No	No	None required

Environmental Issue Area	Where Was Impact Analyzed in the MND?	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance Requiring New Analysis or Verification?	What MND MMs Address Impacts?
d. Interfere substantially with the movement of any native resident or migratory fish and wildlife Species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	MND, p. 11	No	No	No	MMs BR-17 through BR-27
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.	MND, p. 11	No	No	No	MMs BR-1 through BR-10
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	MND, p. 11	No	No	No	None required
<p>Discussion: The MND concluded that implementation of the MMs BR-1 through BR-27 would reduce impacts to Silvery Legless Lizard, special-status birds, American Badger, bats, and the San Joaquin Kit Fox to less than significant. Impacts to oak trees would be protected under the City’s Oak Tree Preservation Ordinance and implementation of MMs BR-1 through BR-10. The pages indicated in the table above contain the relevant analysis. MMs BR-17 through MMs BR-27 designed to minimize impacts to San Joaquin Kit Fox to a less-than-significant level and adopted as part of the 2016 MMRP are consistent with MMs BR-1 through MMs BR-11 previously adopted as part of the approval of the 2006 MND.</p> <p>The Project site has been previously disturbed and graded but is currently vacant. Given the prior disturbance and surrounding development it is unlikely that high quality habitat for San Joaquin Kit Fox remains present on the Project site. Nevertheless, implementation of MMs BR-17 and MMs BR-27 will ensure any potential impacts to the San Joaquin Kit Fox are less than significant. Mitigation fees with respect to the San Joaquin Kit Fox (MM BR-17) do not apply to this Project as this impact has been previously mitigated by the developer of Tract 2778.</p> <p>The Project does not involve any element that might result in a new significant or substantially more severe impacts to biological resources. The Project involves ground disturbing work including construction of a seven buildings and associated infrastructure on vacant land. Any impacts to biological resources that may occur as a result of the Project would be within the scope of those discussed in the MND. Furthermore, the City is not aware of any new circumstances or new information that might result in new significant or substantially more severe impacts to biological resources in relation to the Project.</p> <p>Mitigation Measures: MMs BR-1 through BR-27</p> <p>Conclusion: With implementation of the above MMs, the Project would not have any new significant or substantially more severe impacts to biological resources (CEQA Guidelines § 15162(a)).</p>					
5. CULTURAL RESOURCES. Would the project:	MND, p. 12				
a. Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?	MND, p. 12	No	No	No	MMs CR-1 through CR-13
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	MND, p. 12	No	No	No	MMs CR-1 through CR-13
c. Disturb any human remains, including those interred outside the formal cemeteries?	MND, p. 12	No	No	No	MMs CR-1 through CR-13
<p>Discussion: The 2016 MND concludes potential impacts to identified archaeological and cultural resources from future development can be avoided through project design modification and implementation of mitigation measures provided in the Phase I Archaeological Survey. With implementation of MMs CR-1 through CR-13 impacts on cultural resources will be less than significant. The pages indicated in the table above contain the relevant analysis.</p> <p>The Project site has been previously disturbed, i.e., graded, but is currently vacant. While the Project site has been graded and public utility infrastructure has been installed the impacts to previously unidentified subsurface archaeological resources are potentially significant. With implementation of MMs CR-1 through CR-13 the Project will result in less-than-significant impacts on cultural resources.</p>					

Environmental Issue Area	Where Was Impact Analyzed in the MND?	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance Requiring New Analysis or Verification?	What MND MMs Address Impacts?
<p>The Project does not involve any element that might result in a new significant or substantially more severe impacts to cultural resources. The Project involves ground disturbing work including construction of a seven buildings and associated infrastructure on vacant land. Any impacts to cultural resources that may occur as a result of the Project would be within the scope of those discussed in the MND. Furthermore, the City is not aware of any new circumstances or new information that might result in new significant or substantially more severe impacts to cultural resources in relation to the Project.</p> <p>Mitigation Measures: MMs CR-1 through CR-13</p> <p>Conclusion: With implementation of the above MMs, the Project would not have any new significant or substantially more severe impacts to cultural resources (CEQA Guidelines § 15162(a)).</p>					
6. ENERGY. Would the project:	Not addressed				
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	Not addressed	No	No	No	None required
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	Not addressed.	No	No	No	None required
<p>Discussion: As a part of the 2018 CEQA Guidelines update, the Appendix G checklist was revised to include Energy as a category of analysis. The MND did not address energy impacts. The 2006 MND, however, concluded that development of Tract 2278, which is part of the proposed Project site, with similar uses to those currently proposed, would result in no energy impacts. Resolution No. 06-029 approving Tract 2778 included Condition of Approval 12, further required implementation of identified energy efficiency measures as feasible.</p> <p>The Project is consistent with the Tract 2278 Condition of Approval 12. The Project will meet or exceed the California Building Energy Efficiency Standards contained in Title 24, part 6 of the California Code of Regulations and will comply with General Plan Policy C-7A which requires investigation and implementation of energy conservation measures as feasible. Construction activities at the Project site would be temporary and consist of site preparation, grading, construction of buildings, paving, and installation of landscaping. The construction sequencing will be designed to be efficient in order to avoid excess monetary costs. In other words, equipment and fuel are not typically used wastefully onsite because of the added expense associated with renting the equipment, as well as maintenance and fuel. Project construction would meet applicable state and federal energy policies or standards established for equipment and vehicle efficiency. Any energy impacts that may occur as a result of the Project would be within the scope of those discussed in the 2006 MND. Furthermore, the City is not aware of any new circumstances or new information that might result in new significant or substantially more severe energy impacts in relation to the Project.</p> <p>The Project does not involve any element that might result in a new significant or substantially more severe energy impacts. Any energy impacts that may occur as a result of the Project would be within the scope of those discussed in the 2006 MND. Furthermore, the City is not aware of any new circumstances or new information that might result in new significant or substantially more severe energy impacts in relation to the Project.</p> <p>Mitigation Measures: None required</p> <p>Conclusion: The Project would not have any new significant or substantially more severe impacts on energy resources (CEQA Guidelines § 15162(a)).</p>					
7. GEOLOGY AND SOILS. Would the project:	MND, pp. 13-15				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. ii. Strong seismic ground shaking? iii. Seismic-related ground failure, including liquefaction?	MND, pp. 13-14	No	No	No	None required

Environmental Issue Area	Where Was Impact Analyzed in the MND?	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance Requiring New Analysis or Verification?	What MND MMs Address Impacts?
iv. Landslides?					
b. Result in substantial soil erosion or the loss of topsoil?	MND, p. 14	No	No	No	None required
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	MND, p. 14	No	No	No	None required
d. Be located on expansive soil, as defined in Table 18- 1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	MND, p. 14	No	No	No	None required
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	MND, p. 14	No	No	No	None required
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	MND, p. 12	No	No	No	MMs CR-1 through CR-13
<p>Discussion: The MND concluded that impacts to geological and soils impacts would be less than significant. Impacts to paleontological resources and unique geologic features are analyzed in the cultural resources discussion in the MND, which concludes that with implementation of the MMs such impacts would be reduced to less-than-significant levels. The pages indicated in the table above contain the relevant analysis.</p> <p>The Project site has been previously disturbed, i.e., graded, but is currently vacant. While the Project site has been graded and public infrastructure has been installed the impacts to previously unidentified subsurface paleontological resources are potentially significant. With implementation of MMs CR-1 through CR-13 the Project will result in less-than-significant impacts on paleontological resources.</p> <p>The Project does not involve any element that might result in a new significant or substantially more severe geological or soils impacts. The Project involves ground disturbing work including construction of a seven buildings and associated infrastructure on vacant land. Any geological or soils impacts that may occur as a result of the Project would be within the scope of those discussed in the MND. Furthermore, the City is not aware of any new circumstances or new information that might result in new significant or substantially more severe impacts to geological and soils resources in relation to the Project.</p> <p>Mitigation Measures: MM CR-1 to CR-13</p> <p>Conclusion: With implementation of the above MMs, the Project would not have any new significant or substantially more severe impacts to geological and soil resources (CEQA Guidelines § 15162(a)).</p>					
8. GREENHOUSE GAS EMISSIONS.	MND, p. 15				
Would the project:					
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	MND, p. 15	No	No	No	None required
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	MND, p. 15	No	No	No	None required
<p>Discussion: The MND concluded that GHG emissions resulting from future development would need to be evaluated at the time such development is proposed and that mitigation be developed at that time, as necessary.</p> <p>Operational and construction GHG emissions associated with the Project were estimated using CalEEMod version 2020.4.0 as recommended by SLOCAPCD. With respect to construction emissions, the analysis conservatively assumes that construction of all seven</p>					

Environmental Issue Area	Where Was Impact Analyzed in the MND?	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance Requiring New Analysis or Verification?	What MND MMs Address Impacts?
<p>buildings and associated infrastructure would be constructed at the same time. Since each building is, however, a stand-alone project, the applicant does not anticipate typical project phasing. The sequence of construction of the buildings will be based on market demand and tenancing considerations.</p> <p>GHG emissions attributable to construction and operation of the Project would be below 2030 GHG efficiency significance threshold based on the State’s 2030 GHG reduction target mandated by Senate Bill 32 as set forth in CARB’s 2017 Scoping Plan Update. The Project would not conflict with the City’s Climate Action Plan based on the State’s 2020 GHG reduction target mandated by Assembly Bill 32. The Project will incorporate mandatory actions as identified in the City’s Climate Action Plan Consistency Worksheet, which shall be conditions of approval for the Project. Additionally, implementation of MM AQ-2 designed to reduce ozone precursor emissions would also serve to reduce GHG emissions. Therefore, the Project would not generate GHG emissions that would have a significant impact on the environment or conflict with applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions.</p> <p>Mitigation Measures: None.</p> <p>Conclusion: The Project would not have any new significant or substantially more severe impacts related to GHG emissions (CEQA Guidelines § 15162(a)).</p>					
9. HAZARDS AND HAZARDOUS MATERIALS. Would the project:	2016 MND, pp. 15-17				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	2016 MND, p. 15	No	No	No	None required
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	2016 MND, p. 16	No	No	No	None required
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one- quarter mile of an existing or proposed school?	MND, p. 16	No	No	No	None required
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	MND, p. 16	No	No	No	None required
e. For a project located within an airport land use plan or, where Such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	MND, p. 16	No	No	No	None required
f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working on the project area?	MND, p. 17	No	No	No	None required
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	MND, p. 17	No	No	No	None required

Environmental Issue Area	Where Was Impact Analyzed in the MND?	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance Requiring New Analysis or Verification?	What MND MMs Address Impacts?
h. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	MND, p. 17	No	No	No	None require
<p>Discussion: The MND concludes that impacts related to hazards and hazardous materials would be less than significant. The project site is not located within one-quarter mile of a school and is not identified as a hazardous site per Government Code section 65962.5. Impacts related to hazards and hazardous materials will be evaluated on a project by project bases as each lot develops in the future. The MND considered compatibility with the Airport Land Use Plan (ALUP) for anticipated future development. The MND concluded that any future development would be required to comply with policies and guidelines in the ALUP. The pages indicated in the table above contain the relevant analysis of the potential impacts.</p> <p>Construction of the Project would involve the temporary transport, use, and disposal of potentially hazardous materials. These materials may include paints, adhesives, surface coatings, cleaning agents, fuels, and oils that are typically associated with any urban development project. These materials would be used temporarily during construction. All potentially hazardous materials associated with construction activities would be used and stored in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations, which further minimizes the potential risk associated with construction-related hazardous materials. From an operational perspective, the Project does not involve the routine use, transport, or disposal of hazardous materials.</p> <p>The Project is located in Airport Safety Zones 3, 4, and 5 industrial and office uses are permitted in these Safety zones.</p> <p>The Project is consistent with Conditions of Approval 7 through 17 associated with the approval of Tract 3069, as applicable. (See Reso. 16-105.) With respect to the limit on non-residential density in Safety Zone 4, no high-density users currently exist in the Project area and therefore the threshold level for non-residential density will not be exceeded. (See Condition of Approval 11.) The Project does not include uses listed as noise sensitive uses in the ALUP. (See Condition of Approval 13 and 14.)</p> <p>The Project does not involve any element that might result in a new significant or substantially more severe hazards or hazardous materials impacts. Any hazards or hazardous materials impacts that may occur as a result of the Project would be within the scope of those discussed in the MND. Furthermore, the City is not aware of any new circumstances or new information that might result in new significant or substantially more severe hazards or hazardous materials in relation to the Project.</p> <p>Mitigation Measures: None required</p> <p>Conclusion: The Project would not have any new significant or substantially more severe impacts related to hazards and hazardous materials (CEQA Guidelines § 15162(a)).</p>					
10. HYDROLOGY AND WATER QUALITY. Would the Project:	MND, pp. 17-21				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	MND, p. 17	No	No	No	None required
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	MND, p. 18	No	No	No	MMs HYD-1 and HYD-2
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	MND, p. 19	No	No	No	None required
i. would result in substantial erosion or siltation on- or off-site;	MND, p. 19	No	No	No	None required
ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	MND, p. 19	No	No	No	None required
iii. create or contribute runoff water which	MND, p. 19	No	No	No	None Required

Environmental Issue Area	Where Was Impact Analyzed in the MND?	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance Requiring New Analysis or Verification?	What MND MMs Address Impacts?
would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or					
iv. impede or redirect flood flows?	MND, p. 19	No	No	No	None Required
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	MND, p. 20	No	No	No	None required
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	N/A	N/A	N/A	N/A	None required

Discussion: The MND concluded that implementation of mitigation measures HYD-1 and HYD-2, which require the use of recycled water when available and meters on any wells, would reduce all hydrology and water quality impacts to less-than-significant levels. The pages indicated in the table above contain the relevant analysis.

The Project site has been previously disturbed, i.e., graded, but is currently vacant. Stormwater infrastructure has been previously installed consistent with the Conditions of Approval adopted with approval of Tract 3069 and Tract 2778 and any subsequent development approved for the parcels located in those subdivisions. The Project involves development of 12 parcels including construction of seven buildings for light industrial/commercial use. The Project is subject to Post-Construction Stormwater Management Requirements which are regulated by the Regional Water Quality Control Board. The Project is located within WMZ which is subject to Performance Requirements (PRs) 1 through 4 based on the acreage of impervious development. Below is a summary of how Project complies with these requirements.

PR #1 Site Design and Runoff Reduction – This requirement is met using underground stormwater detention.

PR #2 Water Quality Treatment and PR #3 Runoff Retention – Retention of the 95th percentile 24-hour storm meets the requirements of both PR #2 and PR #3. All runoff for each building is routed to underground detention basins where the 95th percentile 24-hour storm can be fully retained and infiltrated. The basin outlets are each held above the bottom of the basin to facilitate retention and infiltration. The underground detention basins are located beneath the parking area of each building.

PR #4 Peak Management – Post developed peak flows cannot exceed existing peak flow rates for the 2 through 10-year storm events. The underground detention basins for each building attenuate the proposed flows to an acceptable discharge rate. Underground detention basins from Buildings 1 through 4 will connect to storm drain piping in Wisteria that carries water out through the IQMS building parking lot outfall north of Wisteria Lane. Underground detention basins from Buildings 5 through 7 will connect to the storm drain piping that currently drains the open lots and connects to the detention basin located near the Justin Winery Wisteria 1 and 2 buildings, north of Wisteria Lane, and then to an outfall to the drainage north of the Justin winery buildings.

The Project will comply with previously adopted MMs HYD-1 and HYD-2.

The Project is consistent with the General Plan land use designation. Accordingly, development of the Project is included in the City’s Urban Water Management Plan (UWMP) (July 2021), which is based on General Plan growth assumptions and buildout conditions. While a Groundwater Sustainability Plan has been submitted to the Department of Water Resources, the UWMP establishes that the long-term water supply to meet projected demands does not reflect the total groundwater supply available to the City nor does it reflect any limits on the City’s groundwater rights. Pumping could increase or otherwise vary depending on factors that may influence the availability and use of other supplies, e.g., recycled water use. Use of groundwater to meet projected demand is anticipated to decrease between 2025 and 2045. (2020 UWMP.)

The Project does not involve any element that might result in a new significant or substantially more severe hydrology and water quality impacts. Any impacts to hydrology, groundwater, and water quality that might occur as a result of the Project are within the scope of those discussed in the 2016 MND and prior environmental documents. Furthermore, the City is not aware of any new circumstances or new information that might result in new significant or substantially more severe hydrology and water quality impacts in relation to the Project.

Mitigation Measures: HYD-1, HYD-2

Conclusion: With implementation of the above MMs, the Project would not have any new significant or substantially more severe impacts to hydrology and water quality (CEQA Guidelines § 15162(a)).

Environmental Issue Area	Where Was Impact Analyzed in the MND?	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance Requiring New Analysis or Verification?	What MND MMs Address Impacts?
11. LAND USE AND PLANNING. Would the project:	2016 MND, pp. 20-21				
a. Physically divide an established community?	2016 MND, p. 20	No	No	No	None required
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	2016 MND, p. 20	No	No	No	None required
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	2016 MND, p. 21	No	No	No	None required

Discussion: The 2016 MND concluded that the following land use and planning impacts were less than significant and no mitigation was required. The pages indicated in the table above contain the relevant analysis.

The Project is consistent with applicable land use regulations including the City's zoning regulations, the existing land use approvals and associated environmental review, and the ALUP. The Project is located in Airport Safety Zones 3, 4, and 5 industrial and office uses are permitted in these safety zones.

The Project is consistent with Conditions of Approval 7-through 17 associated with the approval of Tract 3069, as applicable. (See Reso. 16-105.) With respect to the limit on non-residential density in Safety Zone 4, no high-density users currently exist in the Project area and therefore the threshold level for non-residential density will not be exceeded. (See Condition of Approval 11.) The Project does not include uses listed as noise sensitive uses in the ALUP. (See Condition of Approval 13 and 14.)

The Project does not involve any element that might result in a new significant or substantially more severe land use impacts. Any impacts to land use and planning that might occur as a result of the Project would be within the scope of those discussed in the MND. Furthermore, the City is not aware of any new circumstances or new information that might result in new significant or substantially more severe impacts to land use and planning in relation to the Project.

Mitigation Measures: None required

Conclusion: The Project would not have any new significant or substantially more severe impacts to land use and planning (CEQA Guidelines § 15162(a)).

12. MINERAL RESOURCES. Would the Project:	MND, p. 22				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	MND, p. 22	No	No	No	None required
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	MND, p. 22	No	No	No	None required

Discussion: The 2016 MND establishes that there are no known mineral resources in the Project area. The pages indicated in the table above contain the relevant analysis.

The Project site has been previously disturbed, i.e., graded, but is currently vacant. The Project does not involve any element that might result in a new significant or substantially more severe impacts to mineral resources. Any impacts to mineral resources that might occur as a result of the Project would be within the scope of those discussed in the 2016 MND. Furthermore, the City is not aware of any new circumstances or new information that might result in new significant or substantially more severe impacts to mineral resources in relation to the Project.

Mitigation Measures: None required

Conclusion: The Project would not have any new significant or substantially more severe impacts to mineral resources (CEQA Guidelines § 15162(a)).

Environmental Issue Area	Where Was Impact Analyzed in the MND?	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance Requiring New Analysis or Verification?	What MND MMs Address Impacts?
13. NOISE. Would the project result in:	MND, pp. 22-24				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	MND, p. 22	No	No	No	None required
b. Generation of excessive groundborne vibration or groundborne noise levels?	MND, pp. 23-24	No	No	No	None required
c. For a project located within the vicinity of a private airstrip or an airport land use plan or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	MND, p. 22	No	No	No	None required
<p>Discussion: The MND concluded that that noise impacts would be less than significant. The pages indicated in the table above contain the relevant analysis. With respect to projects located within an ALUP, future development would be required to comply with policies and guidelines designed to reduce safety hazards for people working in the project area.</p> <p>Construction activities are exempt from the City’s noise ordinance because the Project site is located beyond 1,000 feet of noise-sensitive land uses. (See Municipal Code, § 21.60.100(6). Construction activities will take place during daytime hours, which are defined as 7 a.m. and 7 p.m. excluding Sundays and federal holidays. Construction of the Project involves a technique referred to as tilt-up or tilt-slab construction, which minimizes the use of heavy construction equipment that may cause construction vibration. Accordingly, construction of the Project would not result in the generation of excessive groundborne vibration or groundborne noise levels.</p> <p>The Project is located in Airport Safety Zones 3, 4, and 5. The Project is consistent with the ALUP. Buildings 1, 2 and 3 are located outside of the mapped noise contours. Buildings 4-7 are located within the 55 dB noise contour. The proposed warehouse uses are not considered noise sensitive uses; offices are considered a moderately noise sensitive use. Typical construction noise level reduction methods will sufficiently attenuate and mitigate any potential impact to interior noise levels within the office areas.</p> <p>The Project does not involve any element that might result in a new significant or substantially more severe noise impacts. Any noise impacts that might occur as a result of the Project would be within the scope of those discussed in the MND. Furthermore, the City is not aware of any new circumstances or new information that might result in new significant or substantially more severe noise impacts in relation to the Project.</p> <p>Mitigation Measures: None required</p> <p>Conclusion: The Project would not have any new significant or substantially more severe impacts to noise (CEQA Guidelines § 15162(a)).</p>					
14. POPULATION AND HOUSING. Would the Project:	MND, p. 24				
a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	MND, p. 24	No	No	No	None required
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	MND, p. 24	No	No	No	None required
<p>Discussion: The MND concluded that all population and housing impacts are less than significant and do not require mitigation. The pages indicated in the table above contain the relevant analysis.</p>					

Environmental Issue Area	Where Was Impact Analyzed in the MND?	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance Requiring New Analysis or Verification?	What MND MMs Address Impacts?
<p>The Project site is currently vacant. As there are no existing residential units, the Project will not displace any people or housing. The Project will allow for development consistent with the General Plan land use designation and existing zoning. While future tenants of the Project have not yet been identified, it is anticipated that any jobs created by future tenants can be absorbed by the local and regional employment market, and therefore will not create the demand for new housing or population growth to displace housing or people. Additionally, the sequence of construction of the buildings will be based on market demand (including the job market) and tenanting considerations.</p> <p>The Project is consistent with the type of development contemplated in the MND. There are no residential units on the Project site. The Project does not involve any element that might result in a new significant or substantially more severe population and housing impacts. Any population and housing impacts that might occur as a result of the Project would be within the scope of those discussed in the MND. Furthermore, the City is not aware of any new circumstances or new information that might result in new significant or substantially more severe population and housing impacts in relation to the Project.</p> <p>Mitigation Measures: None required</p> <p>Conclusion: The Project would not have any new significant or substantially more severe impacts to population and housing (CEQA Guidelines § 15162(a)).</p>					
15. PUBLIC SERVICES.	MND, p. 25				
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any the public services:	MND, p. 25	No	No	No	None required
Fire protection?	MND, p. 25	No	No	No	None required
Police protection?	MND, p. 25	No	No	No	None required
Schools?	MND, p. 25	No	No	No	None required
Parks?	MND, p. 25	No	No	No	None required
Other public facilities?	Same as (a) above	No	No	No	None required
<p>Discussion: The MND concluded that public services impacts would all be less than significant. The pages indicated in the table above contain the relevant analysis.</p> <p>The Project consists of development of a business park. It does not include new neighborhoods or a significantly large-scale development that would result in significant demand for additional new services. Any potential impacts will be mitigated through payment of development impact fees as indicated in the MND.</p> <p>The Project does not involve any element that might result in a new significant or substantially more severe impacts to public services. Any public services impacts that might occur as a result of the Project would be within the scope of those discussed in the MND. Furthermore, the City is not aware of any new circumstances or new information that might result in new significant or substantially more public services impacts in relation to the Project.</p> <p>Mitigation Measures: None required</p> <p>Conclusion: The Project would not have any new significant or substantially more severe impacts to public services (CEQA Guidelines § 15162(a)). All required impact fees supporting public services will be paid at the appropriate time in the construction process, if not already paid for the subject parcels.</p>					

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16. RECREATION.	MND, p. 25				
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	MND, p. 25	No	No	No	None required
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?	MND, p. 25	No	No	No	None required
<p>Discussion: The MND concluded that all recreation impacts are less than significant and, thus, no mitigation was necessary. The pages indicated in the table above contain the relevant analysis.</p> <p>The Project consists of development of a business park and will not encourage new housing demands and use of recreational facilities.</p> <p>The Project does not involve any element that might result in a new significant or substantially more severe impacts to recreation. Any impacts to recreation that might occur as a result of the Project are within the scope of those discussed in the MND. Furthermore, the City is not aware of any new circumstances or new information that might result in new significant or substantially more severe impacts to recreation in relation to the Project.</p> <p>Mitigation Measure: None required</p> <p>Conclusion: The Project would not have any new significant or substantially more severe impacts to recreation (CEQA Guidelines § 15162(a)).</p>					
17. TRANSPORTATION. Would the project:	MND, pp. 26				
a. Conflict with a program plan, ordinance or policy establishing addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities	MND, pp. 26-28	No	No	No	MM T-1 through T-5
b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	MND, pp. 26-28	No	No	No	MM T-1 through T-5
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)??	MND, pp. 28	No	No	No	None required.
d. Result in inadequate emergency access?	MND, p. 28.	No	No	No	None required
<p>Discussion: The MND used automobile delay or level of service (LOS) as the primary metric to evaluate the project’s CEQA transportation impacts, consistent with industry standards at the time. Since that time, legislation (Senate Bill (SB) 743, signed into law in 2013) and regulatory updates (CEQA Guidelines section 15064.3, added in December 2018) direct agencies to utilize vehicle miles traveled (VMT) for assessing potential traffic impacts. Although lead agencies may choose to conduct additional traffic analysis using VMT for subsequent CEQA review of documents prepared prior to 2018 when the CEQA Guidelines were updated, they are not required to do so (see CEQA Guidelines §§ 15064.3(c), 15007(b), 15008(b); see also Governor’s Office of Planning and Research SB 743 Frequently Asked Questions, “What about draft documents that still use LOS? Do they need to be redone with VMT analysis?” https://opr.ca.gov/ceqa/updates/sb-743/faq.html#draft-docs.) The MND concluded that all transportation impacts could be reduced to less than significant with mitigation.</p> <p>Notwithstanding that the City is not required to analyze VMT for previously reviewed projects for which LOS was used as the traffic impact metric, the City has prepared an updated traffic study for this Project, which concludes that the Project would not exceed the City’s adopted thresholds and therefore the Project would have a less-than-significant impact to VMT. (See Paso Commons Transportation Impact Study, Central Coast Consulting, May 2022.)</p>					

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<p>The Project does not involve any element that might result in new significant or substantially more severe impacts to transportation. The updated traffic study did not identify any LOS impacts resulting from the project, consistent with the MND. As applicable, traffic impact fees will be paid at the time of occupancy for all buildings associated with the Project in accordance with MM T-3. Furthermore, the City is not aware of any new circumstances or new information that might result in new significant or substantially more severe impacts to transportation in relation to the Project.</p> <p>Mitigation Measures: MMs T-1 through T-5</p> <p>Conclusion: With implementation of the above MMs, the Project would not have any new significant or substantially more severe impacts to transportation (CEQA Guidelines § 15162(a)).</p>					
18. TRIBAL CULTURAL RESOURCES. Would the project:	MND, Phase I Archaeological Study MND, pp. 12-13				
a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: <ul style="list-style-type: none"> i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. 	MND, Phase I Archaeological Study MND, pp. 12-13	No	No	No	MMs CR-8 through CR-13
<p>Discussion: As a part of the 2018 CEQA Guidelines update, the Appendix G checklist was revised to include Tribal Cultural Resources as a category of analysis. At the time the MND was prepared and certified, tribal cultural resources was addressed under Cultural Resources in the EIR. This analysis has been taken from that section and presented here to accommodate the revised checklist.</p> <p>The Phase I Archaeological Survey prepared for the 2016 MND indicated that the Sacred Lands File did not indicate the presence of Native American cultural resources. No response was received from contact letters submitted to the Northern Chumash Tribe, Santa Ynez Band of Mission Indians, or the Northern Chumash Tribal Council. If potential cultural resources are encountered during project activities, implementation of mitigation measures CR-8 through CR-13 would reduce potential impacts to a less-than-significant level.</p> <p>The City notified NCTC Northern Chumash Tribal Council of the Project on March 30, 2022. No request for consultation has been received.</p> <p>The Project does not involve any element that might result in a new significant or substantially more severe impact to tribal cultural resources. Any unanticipated impacts to tribal cultural resources that might occur as a result of the Project would be within the scope of those discussed in the MND. Furthermore, the City is not aware of any new circumstances or new information that might result in new significant or substantially more severe impacts to tribal cultural resources in relation to the Project.</p> <p>Mitigation Measures: MMs CR-8 through CR-13</p> <p>Conclusion: With implementation of the above MMs, the Project would not have any new significant or substantially more severe impacts to tribal cultural resources (CEQA Guidelines § 15162(a)).</p>					

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19. UTILITIES AND SERVICE SYSTEMS. Would the Project:	MND, pp. 29-30				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	MND, p. 29	No	No	No	None required
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	MND, p. 30	No	No	No	None required
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	MND, p. 29	No	No	No	None required
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	MND, p. 30	No	No	No	None required
e. Comply with federal, state, and local statutes and regulations related to solid waste?	MND, p. 30	No	No	No	None required
<p>Discussion: The MND concluded that impacts to utilities and service systems would be less than significant, and no mitigation would be required. The pages indicated in the table above contain the relevant analysis.</p> <p>The Project utilities have been designed to accommodate utility services to each parcel and individual building. The Project includes new sewer, water, storm drain, electrical, and communication connections to Wisteria Lane. The Project includes underground installation of utilities; existing utilities are also underground. Certain utilities have been previously installed consistent with the Conditions of Approval adopted with approval of Tract 3069 and Tract 2778 and any subsequent development approved for the parcels located in those subdivisions.</p> <p>The Project does not involve any element that might result in a new significant or substantially more severe impacts to utilities and service systems. Since the Project would be constructed on existing lots where existing utility and services have been provided to the vacant lots, any impacts to utilities and service systems would be within the scope of those discussed in the MND. Furthermore, the City is not aware of any new circumstances or new information that might result in new significant or substantially more severe impacts to utilities and service systems in relation to the Project.</p> <p>Mitigation Measures: None required.</p> <p>Conclusion: The Project would not have any new significant or substantially more severe impacts to utilities and service systems (CEQA Guidelines § 15162(a)).</p>					

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20. WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:	MND, p. 17				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	MND, p. 17	No	No	No	None required
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	Not addressed	No	No	No	None required
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	Not addressed	No	No	No	None required
<p>Discussion: As a part of the 2018 CEQA Guidelines update, the Appendix G checklist was revised to include Wildfire as a category of analysis. At the time the MND was prepared and certified, wildfire was addressed under Hazards and Hazardous Materials in the EIR. This analysis has been taken from that section and presented here to accommodate the revised checklist.</p> <p>The MND concluded that subdivision of the property and general plan amendment would not expose people or structures to significant risk of loss, injury or death involving wildland fires because no development was proposed at that time. Additionally, at that time the City did not have an adopted emergency response plan and therefore the MND concluded that future development would not interfere with emergency response. The pages indicated in the table above contain the relevant analysis.</p> <p>Based on discussions with the local fire department, the City is located in a Local Responsibility Area and within the City limits there are no declared hazard areas. Accordingly, the Project is not located within a high fire hazard zone. The Project does not involve any element that might result in a new significant or substantially more severe wildfire impacts. Any impacts related to wildfire would be within the scope of those discussed in the MND. Furthermore, the City is not aware of any new circumstances or new information that might result in new significant or substantially more severe wildfire impacts in relation to the Project.</p> <p>Mitigation Measures: None required</p> <p>Conclusion: The Project would not have any new significant or substantially more severe wildfire impacts (CEQA Guidelines § 15162(a)).</p>					
21. MANDATORY FINDINGS OF SIGNIFICANCE.	MND, pp. 30-31				
a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of an endangered, rare or threatened species, or eliminate important examples of the major periods of California history or prehistory?	MND, pp. 30-31	No	No	No	MMs BR-1 through BR-27

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b. Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when view in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	MND, p. 31	No	No	No	None required
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	MND, p. 31	No	No	No	None required
<p>Discussion: The MND concludes that future development impacts related to habitat for wildlife species will be less than significant with mitigation.</p> <p>The Project does not involve any element that might result in a new significant or substantially more severe cumulative impacts. Any contribution to cumulative impacts would be within the scope of those discussed in the MND. Furthermore, the City is not aware of any new circumstances or new information that might result in new significant or substantially more severe cumulative impacts in relation to the Project. Mitigation fees with respect to the San Joaquin Kit Fox (MM BR-17) do not apply to this Project as this impact has been previously mitigated by the developer of Tract 2778.</p> <p>Mitigation Measures: MMs BR-1 through BR-27</p>					