RESOLUTION NO. PC 17-023

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF EL PASO DE ROBLES TO ADOPT A MITIGATED NEGATIVE DECLARATION AND MITIGATION MONITORING AND REPORTING PROGRAM FOR THE PASO ROBLES AIRPORT SOLAR PROJECT (PLANNED DEVELOPMENT 16-008, CONDITIONAL USE PERMIT 16-007) (3103 SATELLITE DRIVE) APN: 025-450-001

WHEREAS, an application for Planned Development (PD 16-008) and Conditional Use Permit (CUP 16-007), have been filed by SunEdison LLC for the Paso Robles Airport Solar Project for a 4-megawatt, ground-mounted photovoltaic solar plant, within the Paso Robles Municipal Airport property; and

WHEREAS, the project is consistent with the applicable policy and regulatory documents of the City, including the following:

- General Plan Public Facilities land use designation The project would provide development
 of a renewable energy utility site which is consistent with the Public Facility (PF) land use
 designation; and
- Zoning District of Airport with a Planned Development Overlay and an Airport Influence Overlay (AP/PD/AP) The project is a "conditionally permitted" use in the AP-PD district; and
- **Airport Master Plan** The 24.6-acre site is located within the Paso Robles Municipal Airport property and has been designated by the Airport Master Plan as future commercial/industrial lease sites; and
- Climate Action Plan The City of Paso Robles has adopted a Climate Action Plan (CAP) in order to reduce greenhouse gas (GHG) emissions resulting from City government operations and community activities within Paso Roble and prepare for the anticipated effects of climate change. According to the City's GHG emissions inventory, the City government operations represents approximately four percent of Paso Robles' total community-wide GHG emissions. The City is committed to reducing its GHG emissions by 15 percent below 2005 levels by 2020, consistent with Assembly Bill (AB) 32.

WHEREAS, pursuant to the Statutes and Guidelines of the California Environmental Quality Act (CEQA), Public Resources Code, Section 21000, et seq., and the City's Procedures for Implementing CEQA, an Initial Study and a Draft Mitigated Negative Declaration (MND) was prepared and circulated for a 20-day public review period beginning on March 29, 2017 through April 25, 2017. No public comments were received on the MND prior to the Planning Commission meeting. A copy of the Draft MND/Initial Study is included in Exhibit B (Attachment 8 of the project staff report) of this Resolution, and it is on file at the Paso Robles Community Development Department; and

WHEREAS, mitigation measures have been incorporated into the MND and will be imposed on the project through the City's adoption of a Mitigation Monitoring and Reporting Program (MMRP) in compliance with CEQA Guideline 15074(d). These mitigation measures are imposed on the project to address potential environmental effects from: biological resources and cultural resources. With the implementation of this mitigation, all potential environmental effects will be reduced to a less than significant level. These mitigation measures are provided in Exhibit A, "Mitigation Monitoring and Reporting Program" attached to this Resolution; and

WHEREAS, mitigation measures set forth in the MMRP are specific and enforceable. The MMRP adequately describes implementation procedures, monitoring responsibility, reporting actions, compliance schedule, and verification of compliance in order to ensure that the Project complies with the adopted mitigation measures; and

WHEREAS, the mitigation measures contained in the MMRP will also be imposed as enforceable conditions of approval; and

WHEREAS, the applicant has executed a Mitigation Agreement whereby the applicant has agreed to incorporate all of the mitigation measures listed in Exhibit B into the project. A copy of the executed Mitigation Agreement is on file in the Community Development Department; and

WHEREAS, public notice of the proposed Draft MND was posted as required by Section 21092 of the Public Resources Code; and

WHEREAS, a public hearing was conducted by the Planning Commission on April 25, 2017 to consider the Initial Study and the Draft MND prepared for the proposed project, and to accept public testimony on the Planned Development, Conditional Use Permit, and environmental determination. At the close of this public hearing, the Planning Commission adopted the MND approving the proposed project; and

WHEREAS, based on the information and analysis contained in the Initial Study prepared for this project and testimony received as a result of the public notice, the Planning Commission finds that there is no substantial evidence supporting a fair argument that there would be a significant impact on the environment with mitigation measures imposed on the project; and

WHEREAS, pursuant to CEQA the Planning Commission has independently reviewed the Initial Study, the Mitigated Negative Declaration, and all comments received regarding the Mitigated Negative Declaration, and based on the whole record before it finds that the Mitigated Negative Declaration was prepared in compliance with CEQA and the CEQA Guidelines, that there is no substantial evidence that the Project will have a significant effect on the environment with the incorporation of mitigation, and the Mitigated Negative Declaration reflects the independent judgment and analysis of the Planning Commission.

NOW, THEREFORE, BE IT RESOLVED, the Planning Commission of the City of El Paso de Robles, based on its independent judgment and analysis, has adopted the Mitigated Negative Declaration (Exhibit B) for the Paso Robles Airport Solar project and adopted a Mitigation Monitoring and Reporting Program (Exhibit A), and imposes each mitigation measure as a condition of approval, in accordance with the Statutes and Guidelines of the California Environmental Quality Act (CEQA) and the City's Procedures for Implementing CEQA.

PASSED AND ADOPTED THIS 25th day of April 2017, by the following roll call vote:

AYES: Commissioners Rollins, Davis, Agredano, Jorgensen, Barth, Brennan and Chairman Donaldson NOES:

ABSENT:

ABSTAIN:

JOIN DONALDSON, CHAIRPERSON

ATTEST:

WARREN FRACE, SECRETARY OF THE PLANNING COMMISSION

Exhibits:

- A. Exhibit A Mitigation Monitoring and Reporting Program
- B. Exhibit B Mitigated Negative Declaration

Exhibit A Mitigation Monitoring and Reporting Plan

Date: April 25, 2017

The following environmental mitigation measures were either incorporated into the approved plans or were incorporated into the conditions of approval. Each and every mitigation measure listed below has been found by the approving body indicated above to lessen the level of environmental impact of the project to a level of non-significance. A completed and signed checklist for each mitigation measure indicates that it has been completed.

Explanation of Headings:

Туре:	. Project, ongoing, cumulative
Monitoring Department or Agency:	. Department or Agency responsible for monitoring a particular mitigation measure
Shown on Plans:	. When a mitigation measure is shown on the plans, this column will be initialed and dated.
Verified Implementation:	. When a mitigation measure has been implemented, this column will be initialed and dated.
Remarks:	. Area for describing status of ongoing mitigation measure, or for other information.

Mitigation Measure PD 16-008, CUP 16-007 (Airport Solar Project)	Туре	Monitoring Department or Agency	Shown on Plans	Verified Implementation	Timing/Remarks
BR-1. An environmental awareness training shall be presented by a qualified biologist to all construction personnel prior to start of project activities. The environmental training shall include an overview of special-status species and sensitive resources with potential to occur on the project site, habitat requirements, and their protection status.	Project	CDD	Grading Plan	CDD	Prior to site disturbance, grading permit issued
 BR-2. The following general measures are recommended to minimize impacts during active construction: a) The use of heavy equipment and vehicles shall be limited to the proposed project limits and defined staging areas/access points. The boundaries of each 	On- going	CDD	Grading Plan	CDD	Prior to site disturbance, grading permit issued

	Mitigation Measure PD 16-008, CUP 16-007 (Airport Solar Project)	Туре	Monitoring Department or Agency	Shown on Plans	Verified Implementation	Timing/Remarks
	work area shall be clearly defined and marked with high visibility fencing. No work shall occur outside these limits.					
b)	Secondary containment such as drip pans shall be used to prevent leaks and spills of potential contaminants.					
c)	Washing of concrete, paint, or equipment, and refueling and maintenance of equipment shall occur only in designated areas. Sandbags and/or absorbent pads shall be available to prevent water and/or spilled fuel from leaving the site.					
d)	Construction equipment shall be inspected by the operator regularly to ensure that equipment is in good working order and no fuel or lubricant leaks are present.					
BR-3.		Project	CDD	Grading Plans	CDD	Prior to issuance of grading permit
by a qu (i.e., Ap species survey or perm	propriately-timed botanical survey(s) will be conducted ualified botanist during the typical blooming period pril - June) for the potentially occurring sensitive plant is listed in Section 3.2.1 of the Biological Report. The will be conducted in all areas proposed for temporary nanent construction activity, including temporary roads, staging yards, and laydown areas.					grading point
en avo	a primary goal, any sensitive plant species countered during the survey(s) shall be flagged for bidance and construction activities shall avoid the rked areas to the maximum extent feasible.					
	o special-status plants are observed, no further action equired.					
avo	ensitive plant individuals or communities cannot be bided during construction (i.e., if avoidance is deemed easible), a mitigation plan for impacts to special-status					

Mitigation Measure PD 16-008, CUP 16-007 (Airport Solar Project)	Туре	Monitoring Department or Agency	Shown on Plans	Verified Implementation	Timing/Remarks
plants shall be developed prior to the onset of construction and implemented during construction.					
At a minimum, the Plan shall:					
Discuss the proposed construction methods, construction schedule, and the implementation schedule of activities proposed as part of the Plan.					
Quantify the anticipated acreages of impact to special- status plant species.					
 Identify each special-status plant species observed on site, including a description of the mitigation activities proposed for each. As appropriate, the measures shall include: 					
 A detailed description of topsoil salvage procedures and long-term soil stockpile 					
storage methods;					
 Methods and timing of any proposed seed collection and storage; 					
 Locations and demarcation of full-time avoidance areas during construction; 					
 Locations and methods for restoration, replanting and/or reseeding (e.g., decompaction, recontouring, scarification, mulching, hand broadcasting, hydroseeding, etc.); and, 					
 Short- and/or long-term monitoring protocols and/or vegetative growth success criteria for restoration. 					
 Include a requirement for photographic documentation and a post-implementation report. 					
The Plan shall be submitted for approval to CDFW and the City prior to the onset of construction.					

Mitigation Measure PD 16-008, CUP 16-007 (Airport Solar Project)	Туре	Monitoring Department or Agency	Shown on Plans	Verified Implementation	Timing/Remarks
BR-4.	Project	CDD	Grading Plans &		Prior to issuance of
All temporarily disturbed areas (e.g., access routes, staging areas, and stockpile areas) will be located at a minimum of 50 feet from any water feature (i.e., the blue line drainage and upland swale). This distance should be maximized wherever feasible.			Building Plans		grading permit and Building Permit
BR-5.	Project	CDD	Building Plans		Prior to issuance of Building Permit
All exterior lighting will be placed or shielded to avoid lighting of open space areas and/or drainages. No permanent night lighting will be installed, except for security and maintenance needs of the constructed facility. Temporary construction lighting will be kept to the minimum amount necessary and shall be directed toward active work areas and away from open spaces and/or drainages.					
BR-6. A qualified biologist shall conduct a pre-activity survey immediately prior to the initiation of initial project activities to ensure special-status wildlife species are not present during the start of construction. In the event sensitive wildlife species are found, they shall be allowed to leave the area on their own volition, relocated (as permitted) to suitable habitat areas located outside the work area(s), or resources agencies will be contacted for further guidance. Pre-activity surveys will include a general assessment for all sensitive resources with potential to be impacted, but focusing on SJKF and associated potential den sites.	Project	CDD	Grading Plans & Building Plans		Prior to site disturbance/ issuance of grading permit
BR-7.	Project	CDD	Grading Plans	CDD	Prior to site disturbance/ issuance
If work is planned to occur between February 1 and September 15, a qualified biologist shall survey the area for nesting birds within one week prior to activity beginning on site. If nesting birds are located on or near the proposed project site, they					of grading permit

Mitigation Measure PD 16-008, CUP 16-007 (Airport Solar Project)	Туре	Monitoring Department or Agency	Shown on Plans	Verified Implementation	Timing/Remarks
shall be avoided until they have successfully fledged. A non- disturbance buffer of 50 feet will be placed around non-listed, passerine species, and a 250-foot buffer will be implemented for raptor species. All activity will remain outside of that buffer until a qualified biologist has determined that the young have fledged or that proposed construction activities would not cause adverse impacts to the nest, adults, eggs, or young. If special-status avian species are identified, no work will begin until an appropriate buffer is determined in consultation with the local CDFW biologist, and/or the USFWS.					
 BR-8. In accordance with the County Guide to SJKF Mitigation Procedures Under CEQA, the project owner shall adopt the Standard Kit Fox CEQA Mitigation Measures and shall be included on development plans. The following summarizes those that are applicable to this project: The applicant shall mitigate for the loss of kit fox habitat at a ratio of 2:1 or at a ratio as determined by the California Department of Fish and Wildlife, by one the following methods: 	Project	CDD CDFW		Notes shown on construction documents. Approval letter from CDFW.	Prior to issuing grading permit.
1. Establishing a conservation easement on-site or off-site in a suitable San Luis Obispo County location and provide a non-wasting endowment for management and monitoring of the property in perpetuity;					
2. Depositing funds into an approved in-lieu fee program; or					
3. Purchasing credits in an approved conservation bank in San Luis Obispo County.					
• A maximum 25 mph speed limit shall be required at the project site during construction activities.					
All construction activities shall cease at dusk and not start before dawn.					

Mitigation Measure PD 16-008, CUP 16-007 (Airport Solar Project)	Туре	Monitoring Department or Agency	Shown on Plans	Verified Implementation	Timing/Remarks
• A qualified biologist shall be on-site immediately prior to initiation of project activities to inspect for any large burrows (e.g., known and potential dens) and to ensure no wildlife are injured during project activities. If dens are encountered, they should be avoided as discussed below.					
• Exclusion zone boundaries shall be established around all known and potential kit fox dens.					
All excavations deeper than 2 feet shall be completely covered at the end of each working day.					
• All pipes, culverts, or similar structures shall be inspected for SJKF and other wildlife before burying, capping, or moving.					
• All exposed openings of pipes, culverts, or similar structures shall be capped or temporarily sealed prior to the end of each working day.					
All food-related trash shall be removed from the site at the end of each work day.					
 Project-related equipment shall be prohibited outside of designated work areas and access routes. 					
No firearms shall be allowed in the project area.					
Disturbance to burrows shall be avoided to the greatest extent feasible.					
 No rodenticides or herbicides should be applied in the project area. 					
 Permanent fences shall allow for SJKF passage through or underneath (i.e., an approximate 4-inch passage gap shall remain at ground level). 					
 CR-1. A trained and qualified archaeological monitor should perform cultural resources monitoring of any ground disturbing activities associated with the Project that have the potential to impact cultural resources (i.e. grading, trenching). Monitoring is not effective during activities where 	Project	CDD	Grading Plans & Building Plans	CDD	Prior to site disturbance/ issuance of grading permit

Mitigation Measure PD 16-008, CUP 16-007 (Airport Solar Project)	Туре	Monitoring Department or Agency	Shown on Plans	Verified Implementation	Timing/Remarks
soil matrix is not visually exposed (i.e. pile-driving for installation of solar pylons). The monitor will have the ability to redirect construction activities to ensure avoidance of significant impacts to cultural resources.					
• During the initial vegetation removal and grading up to five feet below current ground surface of the site, we recommend full time cultural resources monitoring. The project archaeologist, in coordination with the City of Paso Robles, may re-evaluate the necessity for monitoring after the initial five feet of excavations have been completed.					
 In the event that these resources are inadvertently discovered during ground-disturbing activities, work must be halted within 50 feet of the find until it can be evaluated by a qualified archaeologist. Construction activities could continue in other areas. If the discovery proves to be significant, additional work, such as data recovery excavation or fossil recovery, may be warranted and would be discussed in consultation with the appropriate regulatory agency(ies). 					
 Any potentially significant artifacts, sites or features observed shall be collected and recorded in conjunction with best management practices and professional standards. 					
 Any cultural items recovered during mitigation should be deposited in an accredited and permanent scientific institution for the benefit of current and future generations. 					
• A report documenting the results of the monitoring efforts, including any data recovery activities and the significance of any cultural resources will be prepared and submitted to the appropriate City and County personnel.					
 Procedures of conduct following the discovery of human remains on non-federal lands have been mandated by California Health and Safety Code §7050.5, PRC §5097.98 and the California Code of Regulations (CCR) §15064.5(e). According to the provisions in CEQA, should human remains be encountered, all work in the immediate vicinity of the 					

Mitigation Measure PD 16-008, CUP 16-007 (Airport Solar Project)	Туре	Monitoring Department or Agency	Shown on Plans	Verified Implementation	Timing/Remarks
burial must cease, and any necessary steps to insure the integrity of the immediate area must be taken. The Orange County Coroner will be immediately notified. The Coroner must then determine whether the remains are Native American. If the Coroner determines the remains are Native American, the Coroner has 24 hours to notify the NAHC, who will, in turn, notify the person they identify as the most likely descendent (MLD) of any human remains. Further actions will be determined, in part, by the desires of the MLD. The MLD has 48 hours to make recommendations regarding the disposition of the remains following notification from the NAHC of the discovery. If the MLD does not make recommendations within 48 hours, the owner shall, with appropriate dignity, reinter the remains in an area of the property secure from further disturbance. Alternatively, if the owner does not accept the MLD's recommendations, the owner or the descendent may request mediation by the NAHC.					
 CR-2. A trained and qualified paleontological monitor should perform paleontological monitoring of any ground disturbing activities associated with the Project that have the potential to impact paleontological resources (i.e. grading, trenching). Monitoring is not effective during activities where sediment is not visually exposed (i.e. pile-driving for installation of solar pylons). The monitor will have the ability to redirect construction activities to ensure avoidance of significant impacts to paleontological resources. 	Project	CDD	Grading Plans & Building Plans	CDD	Prior to site disturbance/ issuance of grading permit
• The project paleontologist may re-evaluate the necessity for paleontological monitoring after 50% or greater of the excavations have been completed.					
Any potentially significant fossils observed shall be collected and recorded in conjunction with best management practices and SVP professional standards.					

Mitigation Measure PD 16-008, CUP 16-007 (Airport Solar Project)	Туре	Monitoring Department or Agency	Shown on Plans	Verified Implementation	Timing/Remarks
Any fossils recovered during mitigation should be deposited in an accredited and permanent scientific institution for the benefit of current and future generations.					
 A report documenting the results of the monitoring, including any salvage activities and the significance of any fossils will be prepared and submitted to the appropriate City and County personnel. 					

(add additional measures as necessary)

Explanation of Headings:

ENV 17-002 CALIFORNIA ENVIRONMENTAL QUALITY ACT ENVIRONMENTAL INITIAL STUDY CHECKLIST FORM PASO ROBLES AIRPORT SOLAR PROJECT Public Review Period: April 5, 2017 – April 25, 2017

1.	PROJECT TITLE:	Paso Robles Airport Solar Project Planned Development 16-008, Conditional Use Permit 16-007
2.	LEAD AGENCY:	City of Paso Robles 1000 Spring Street Paso Robles, CA 93446
	Contact: Phone: Email:	Darcy Delgado (805) 237-3970 Ddelgado@prcity.com
3.	PROJECT LOCATION:	North of Satellite Drive / east of Airport Road; Approximately 2.25 miles north of State Route 46 East; APN: 025-450-001
4.	PROJECT PROPONENT:	SunEdison LLC
	Project Representative: Contact Person: Phone: Email:	EPD Solutions, Inc. Jeremy Krout (949) 794-1181 Jeremy@epdsolutions.com
5.	GENERAL PLAN DESIGNATION:	PF (Public Facilities)
6.	ZONING:	AP-PD (Airport, Planned Development Overlay)

7. **PROJECT DESCRIPTION:**

SunEdison LLC (applicant) proposes to construct and operate the Paso Robles Airport Solar facility (Project) on property owned by the City of Paso Robles, at the Paso Robles Municipal Airport. The project consists of a 4-megawatt (MW) ground-mounted solar photovoltaic (PV) power facility on a 24.6-acre site. Once completed, the facility will be unoccupied and will require minimal maintenance during operations. The site is located north of Satellite Drive and east of Airport Road, approximately 2.25 miles north of State Route 46 East. The site has a Public Facilities (PF) land use designation and is zoned Airport Planned Development (AP-PD).

The project requires a Conditional Use Permit (CUP) to operate a renewable energy generation facility. A Development Plan (PD) is also required since the project scope is

greater than 10,000 square feet in size.

8. ENVIRONMENTAL SETTING:

The 24.6-acre site is located within the Paso Robles Municipal Airport property and has been designated by the Airport Master Plan as future commercial/industrial lease sites. Established vineyards are located to the north and west of the site, with vineyards immediately to the north being located in Zones 1, 2, & 3 of the Airport Land Use Plan (ALUP), which include the Runway Protection Zone, Inner Approach/Departure Zone, and Turning/Sideline Zone. Also to the west of the site is the Estrella Adobe Church and Cemetery, located on Airport Road. Existing commercial and industrial uses are located approximately 300-feet to the south of the site, south of Satellite Drive. Land to the east is also within the Airport property and is vacant, bare land.

The project site is generally flat, bare land that has been regularly disked as part of farming activities over the last several decades, but has potential for annual grassland habitat. One U.S. Geological Survey (USGS) blue line stream occurs on the project parcel, a minimum of 50-feet west of the proposed placement of the solar facility. A mature oak tree is located immediately adjacent to the project area. However, preliminary construction drawings have been modified to avoid impacts to individual oak trees.

The project will include an all-weather access road from Satellite Drive and the site will be entirely enclosed within security fencing. The solar field will consist of fixed-tilt or tracking panels with a maximum height of 8-feet. The panels will be organized in north-south rows and connect to associated electrical equipment, such as inverters. The project will connect to the power grid via an existing aboveground power line south of the site.

9. OTHER AGENCIES WHOSE APPROVAL IS REQUIRED (AND PERMITS NEEDED): None.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation:

I find that the proposed project COULD NOT have a significant effect on the environment, and
a NEGATIVE DECLARATION will be prepared.

- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

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

anca) elgado

03/29/17

Signature:

Date

EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2. All answers must take account of the whole action involved. Answers should address off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3. "Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).
- 5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a. Earlier Analysis Used. Identify and state where they are available for review.
 - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8. The explanation of each issue should identify:
 - a. the significance criteria or threshold, if any, used to evaluate each question; and
 - b. the mitigation measure identified, if any, to reduce the impact to less than significance

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
I. 4	AESTHETICS: Would the project:				
a.	Have a substantial adverse effect on a scenic vista?				\boxtimes
b.	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?			\boxtimes	

Discussion (a-b): The project site is relatively flat and is located within a corridor of existing commercial/industrial development located within the Paso Robles Municipal Airport property. Once constructed, the most prominent visual feature of the project would be the solar panel arrays that would encompass most of the site. The maximum height of the panels would be approximately eight-feet above the ground. Additionally, the size, scale and layout of solar panel arrays and ancillary facilities would not create a significant view obstruction or be out of scale or character with surrounding existing commercial/industrial uses. There are no unique or unusual features on the site that could dominate views of the area. The vegetation on the site is sparse and is not unique to the immediate area and therefore is not a scenic resource, nor is it identified in the General Plan as a scenic resource or in a scenic view corridor.

The site is located in proximity to the Estella Adobe Church and Cemetery located on Airport Road which is a historic cultural resource. A Cultural Resources study was prepared for the site (Attachment 8) which evaluated the proposed project in the vicinity of this resource. The project will be setback a minimum of 150-feet from the church and cemetery site and is not anticipated to have any impact to the site. Additionally, the Cultural Resources section further discusses mitigation measures that will be incorporated into the project to protect any historic resources that may be found near the site. Aside from being near the church site, the project is not located near any other scenic resources such as trees, rocks and it is not located in proximity to a state scenic highway.

c. Substantially degrade the existing visual character or quality of the site and its surroundings?

Discussion (c): The height, bulk, pattern, scale and character of the project features would not conflict with the visual character of surrounding predominantly commercial/industrial uses within and around the Airport property. Although the project is located along the northernmost part of the City where the land transitions into more agricultural uses (i.e. vineyards), the project's location and proximity to the Airport would be an extension of the commercial/industrial uses. Furthermore, the height of the most prominent project features, the solar panel arrays, would be lower than existing structures in the area. Therefore, the project is not expected to substantially contrast with surrounding lands, thereby limiting the impact on views.

d.	Create a new source of substantial light or			
	glare which would adversely affect day or nighttime views in the area? (Sources: 1, 2, 10)		\boxtimes	

Discussion (d): The photovoltaic technology proposed uses non-reflective panels to convert solar energy into electricity. The panels have microscopically irregular surfaces and are designed to trap the rays of sunlight and absorb as much light as possible, further reducing reflection and glare. They reflect much less of the sun's energy than normal glass because the panels are not reflective. Therefore, the project would not be a substantial source of glare. There will be no lighting as part of the project, therefore nighttime views in the area will not be impacted.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact			
are Site	II. AGRICULTURE AND FOREST RESOURCES: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:							
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?							
	Discussion (a): The project site is zoned Airpoused in the past for dry crop production, it Farmland of Statewide Importance.							
b.	Conflict with existing zoning for agricultural use, or a Williamson Act contract?				\boxtimes			
	Discussion (b): The project would not conflict for agriculture and is not under a Williamson A		or agricultural use.	The Project Site	is not zoned			
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 5114(g))?							
	Discussion (c): The project area is currently timberland.	vacant land an	d has never been	designated as for	orest land or			
d.	Result in the loss of forest land or conversion of forest land to non-forest use?				\boxtimes			
	Discussion (d): See response to II.c.							
e.	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?							
	Discussion (e): The project area is disturbed va	acant land loca	ted on the City Air	port property.	Although the			

Discussion (e): The project area is disturbed vacant land located on the City Airport property. Although the project is located along the northernmost part of the City where the land transitions into more agricultural uses (i.e. vineyards), the project's location and proximity to the Airport would be an extension of the commercial/industrial uses; therefore, this project would not result in the loss or conversion of farmland, agricultural land under a Williamson Act contract, or forest land. Therefore, no impact is anticipated.

III. AIR QUALITY: Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
project:				
a. Conflict with or obstruct implementation of the applicable air quality plan? (Source: 11)			\boxtimes	

Discussion (a): The project is located in the San Luis Obispo Air Pollution Control District (SLOAPCD). According to the SLOAPCD's CEQA Air Quality Handbook (2012), a consistency analysis with the Clean Air Plan (CAP) is required for a program-level environmental review, and may be necessary for a larger project-level environmental review, depending on the project being considered. Project-Level environmental reviews which may require a consistency analysis with the CAP include: large residential developments and large commercial/industrial developments. For such projects, evaluation of consistency is based on a comparison of the proposed project with the land use and transportation control measures and strategies outlined in the CAP. If the project is consistent with these measures, the project is considered consistent with the CAP. Additionally, projects that exceed SLOAPCD's recommended significance thresholds would also be considered to potentially conflict with regional air quality planning efforts, including the control measures and strategies identified in the CAP. The proposed project is not considered a large development project that would have the potential to result in a substantial increase in population, or employment. In addition, the proposed project is also consistent with existing zoning and land use designations and would not result in the installation of any major stationary sources of emissions. Lastly, the project will not exceed SLOAPCD's recommended significance thresholds for construction and would not generate substantial operational emissions; therefore, the project would not conflict with or obstruct continued implementation of the CAP.

b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation? (Source: 11)

Discussion (b): The project would not exceed SLOAPCD's construction-related significance thresholds, and would not generate substantial operational emissions. Furthermore, the operational components of the project would not add residential or non-residential dwelling units or be growth-inducing. The construction emissions would be temporary, and less than the SLOAPCD's significance thresholds. The project would not diminish an existing air quality rule or future compliance requirement. As a result, the project would not violate any applicable federal or state air quality standards or contribute substantially to an existing or projected air quality violation.

 \square

c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)? (Source: 11)

 \square

 \boxtimes

Discussion (c): Construction-generated emissions are of temporary duration, lasting only as long as construction activities occur, but have the potential to represent a significant air quality impact. The construction of the proposed project would result in the temporary generation of emissions associated with site grading and motor vehicle exhaust associated with construction equipment and worker trips, as well as the movement of construction equipment on unpaved surfaces. Short-term construction emissions would result in increased emissions of ozone-precursor pollutants (i.e., ROG and NOX) and emissions of particulate matter (PM). Emissions of ozone-precursors would result from the operation of on- and off-road motorized vehicles and equipment. Emissions of airborne PM are largely dependent on the amount of ground disturbance associated with site preparation activities and can result in increased concentrations of PM that can adversely affect nearby sensitive land uses. The project proposes minimal grading activities, resulting in the project's construction-generated emissions not exceeding SLOAPCD's construction-related significance

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	
	thresholds. Post-construction, the project would exceed SLOAPCD's operational-related thresh SLOAPCD has recommended standard cond operational emissions associated with energy us significant. These will be incorporated into the p	olds. Althoug litions be inc se and motor v	h the project will r orporated into the ehicle use resulting	not exceed thes project to fu	e thresholds, rther reduce	
d.	Expose sensitive receptors to substantial pollutant concentrations? (Source: 11)			\boxtimes		
	Discussion (d): There are no hospitals, schools, proximal to the site, with the exception of a coup 700 feet to the west of the project site. The projec convert solar energy to electric energy without p controlled to a level that is less than significant a emissions would be short term. Considering the substantial pollutant concentrations.	ple of farm hore ect is a solar pl pollutant emiss as described in	uses located on Airp notovoltaic generation ions. During constru- Response III.a abo	port Road appro ng facility that v uction, emission ve, and construe	oximately would ns would be ction	
e.	Create objectionable odors affecting a substantial number of people? (Source: 11)				\boxtimes	
	Discussion (e): The project would not be a sour facility that would convert solar energy to electr				nerating	
IV.	IV. BIOLOGICAL RESOURCES: Would the project:					
a.	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game		\boxtimes			

or U.S. Fish and Wildlife Service?

Discussion (a): The Biological Report prepared by Terra Verde Environmental Consulting, LLC, dated January 2017 (Attachment 6) indicates that construction of the proposed solar photovoltaic generating facility could affect special status plants and wildlife species. The survey area included the proposed development (24.6-acre site), with an approximate 500-foot buffer, and field observations of the surrounding areas.

The survey included a comprehensive botanical and wildlife inventory, a preliminary jurisdictional analysis of aquatic resources identified on site, and an analysis of habitat, focusing on the potential for special-status species to occur. Although no special species status plant or wildlife species were observed, several could occur: Oval-leaved Snapdragon, Round-leaved Filaree, San Luis Obispo Owl's Clover, Lemmon's Jewelflower, Small-flowered Morning-glory, Santa Lucia dwarf rush, Valley Oak, San Joaquin Kit Fox (SJKF), Vernal pool fairy shrimp, Western spadefoot toad, Western pond turtle, and migratory nesting birds. Potential impacts are outlined in the Biological Study (See Attachment 6, and mitigation measures are recommended in Section 4).

As described in the Biological Study, a late fall botanical survey was completed within the proposed project area, which is outside the typical blooming period for regionally-occurring special-status species. Based on this evaluation and a review of the relevant literature, it was determined that seven (7) special-status plant species have low potential to occur unless their absence can be confirmed through appropriately timed surveys. No special-status plants were documented within the survey area during the site survey. It is unlikely

Potentially	Less Than	Less Than	No
Significant	Significant with	Significant	Impact
Impact	Mitigation	Impact	
	Incorporated		

for there to be special-status plant species on the site since the property has historically been used for oats and barley dry crop farming and has been regularly disked for several decades. However, spring botanical survey(s) are recommended prior to construction during the typical blooming period (i.e., April to June) and to develop and implement a mitigation plan to ensure special-status plants are not impacted, if present. (refer to section 4.2.2 of Biological Study, Attachment 6).

One mature oak tree is located immediately adjacent to the project area. However, preliminary construction drawings have been modified to avoid impacts to individual oak trees. If any impacts (e.g., trimming, removal, compaction within root zone, etc.) occur, mitigation in the form of on-site plantings or off-site protection of existing oak woodland may be required, in compliance with the City's Oak Tree Preservation Ordinance.

While surveying for presence of San Joaquin Kit Fox, the surveyors walked meandering transects to maximize the detectability of wildlife and the amount of visual ground coverage. Although San Joaquin Kit Fox was not detected in the survey area, the proposed project is within the 3 to 1 standard mitigation ratio area for San Joaquin kit fox in San Luis Obispo County. Total kit fox habitat disturbed by the project would be a maximum of 24.6-acres. A SJKF habitat evaluation form was prepared (dated 1-9-17) for the project that produced a score of 55; however, the form was evaluated by the California Department of Fish & Wildlife on 1-24-17, and was revised to produce a score of 76. This means that the mitigation ratio for the site is in the 3:1 mitigation ratio. Therefore, the mitigation requirement would result in 73.8-acres that would need to be mitigated. The applicant proposes to mitigate the 73.8-acres by purchasing credits in a CDFW approved conservation bank. The credits are \$2,500 per acre, which would result in the requirement to pay of \$184,500 to the conservation bank (refer to Section 4.2.3 of Biological Study, Attachment 6). Payment of mitigation fees is required prior to site disturbance.

Vernal pool fairy shrimp were not detected in the survey area. Immediately preceding the survey, 1.01" inches of rain had fallen at the Airport and, although saturated soils were present, no ponded water beyond the drainage channel was observed.

No impacts to western spadefoot toad or western pond turtle are expected. Low to moderately suitable habitat for both species is present within the blue line drainage approximately 50-feet west of the proposed project site. When water is present, the habitat quality increases and the potential for encounter also increases; however, this species is not expected to occur beyond the channel margins.

The project site is located within the foraging area of golden eagles, and the last documented nesting activities for golden eagle occurred within two (2) miles southwest of the project site. Direct impacts to golden eagles or other bird species are most likely to occur if construction activities take place during the typical avian nesting season, generally February 1 through September 15, and as early as January for golden eagles. Indirect impacts may occur due to habitat loss (e.g., removal of suitable nesting trees) or construction-related disturbances that may deter nesting or cause nests to fail. Preconstruction surveys are recommended prior to activities that affect trees and shrubs during the nesting season, March 15 to August 15 (refer to Section 4.2.3 of Biological Study, Attachment 6).

The Biological report has provided mitigation measures that when implemented will reduce the impacts of this project on biological resources to less than significant. See list of mitigation measures BR-1 - BR-8 in the Mitigation Monitoring and Reporting Table, Attachment 1.

b.	Have a substantial adverse effect on any		
	riparian habitat or other sensitive natural		\boxtimes
	community identified in local or regional	 _	_
	plans, policies, regulations or by the		

Potentially	Less Than	Less Than	No
Significant	Significant with	Significant	Impact
Impact	Mitigation	Impact	
	Incorporated		

California Department of Fish and Game or US Fish and Wildlife Service?

Discussion (b): The proposed project would primarily affect bare ground that has been regularly disked for several decades, but has potential for annual grassland habitats. These habitat types are not considered sensitive and do not require mitigation except where it affects special status species. Since no special-status species were identified on the site, and the site is substantially setback from the riparian habitat by a minimum of 50-feet, the project is determined to have a less than significant impact to habitats or other sensitive natural communities.

c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Discussion (c): The project would not affect the blue line drainage channel or abutting vegetation located approximately 50-feet west of the project site. Recommendations and minimization measures included in the Biological Study are provided to ensure unanticipated impacts do not occur to the drainage channel by project-related sediment and erosion.

d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Discussion (d): The biological study indicates that the habitat in the survey area is considered "bare ground" that although regularly disked, has potential for annual grassland habitats and is considered potential habitat for San Joaquin Kit Fox (SJKF). A SJKF habitat evaluation was prepared for the project plans, and based on the score of a 76 concludes that the mitigation ratio for the project should be 3:1. Mitigation and protection measures for SJKF are provided in mitigation monitoring and reporting plan (Attachment 1). Therefore, potential adverse effects of the project on SJKF migration corridors can be reduced to a less than significant with mitigation measures incorporated.

e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Discussion (e): One mature oak tree is located immediately adjacent to the project area. However, preliminary construction drawings have been modified to avoid impacts to individual oak trees. If any impacts (e.g., trimming, removal, compaction within root zone, etc.) occur, mitigation in the form of on-site plantings or off-site protection of existing oak woodland may be required, per any conditions in the City permit.

f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other

Potentially Less Than Less Than Significant Significant with Significant I Impact Mitigation Impact Incorporated

No Impact

approved local, regional, or state habitat conservation plan?

Discussion (f): There are no Habitat Conservation Plans or other related plans applicable in the City of Paso Robles.

V. CULTURAL RESOURCES: Would the project:

a. Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

Discussion (a): The project is located immediately adjacent to the Estrella Adobe Church and Cemetery, a California Historical Landmark, and a previously recorded prehistoric archaeological site on the eastern bank of the creek. No resources were observed during the course of survey of the project area. However, due to the proximity of these two resources, which are within 200 feet of the project area, the project area is considered to have a moderate to high sensitivity for the presence of prehistoric or historical archaeological deposits or features.

Although the project will have minimal grading activities, due to the proximity of the project site to the recorded historical and archaeological resources, the Cultural Resources report has provided mitigation measures that when implemented will reduce the impacts of this project on resources to less than significant. See list of mitigation measures CR-1 - CR-2 in the Mitigation Monitoring and Reporting Table, Attachment 1.

b.	Cause a substantial adverse change in the significance of an archaeological resource pursuant to \$15064.5?	\boxtimes	
	Discussion (b): See response to V.a.		
c.	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	\boxtimes	

Discussion (c): The project is located immediately adjacent to the Estrella Adobe Church and Cemetery, a California Historical Landmark, and a previously recorded prehistoric archaeological site on the eastern bank of the creek. No significant paleontological resources were identified within the project area during the record search or field survey. However, the records search results indicate that significant fossils have been found in similar and adjacent geologic formations in the area, and may be found at an unknown depth within the project boundaries.

Although the project will result in minimal grading activities, due to the proximity of the project site to the recorded cultural resources, the Cultural Resources report has provided mitigation measures that when implemented will reduce the impacts of this project on paleontological resources and/or geological features to less than significant. See list of mitigation measures CR-1 - CR-2 in the Mitigation Monitoring and Reporting Table, Attachment 1.

d. Disturb any human remains, including those

Potentially	Less Than	Less Than	No
Significant	Significant with	Significant	Impact
Impact	Mitigation	Impact	•
-	Incorporated	-	

Discussion (d): The project is located immediately adjacent to the Estrella Adobe Church and Cemetery, a California Historical Landmark, and a previously recorded prehistoric archaeological site on the eastern bank of the creek. No resources were observed during the course of survey of the project area. However, due to the proximity of these two resources, which are within 200 feet of the project area, it is considered to have a moderate to high sensitivity for the presence of prehistoric or historical archaeological deposits or features. There are several unmarked graves known to exist within the original boundaries of the cemetery associated with the church, and one known burial that lies outside of the boundary of the cemetery to the north (and outside of the project area). A creek passes between the cemetery and the project area, which likely served as a topographic boundary when the church was in use. During project construction, there is still the potential of encountering unmarked human burials within the project area, particularly within the northwestern portion of the project site.

Although the project will result in minimal grading activities, due to the proximity of the project site to the recorded cultural resources, the Cultural Resources report has provided mitigation measures that when implemented will reduce the impacts of this project on cultural resources to less than significant. See list of mitigation measures CR-1 - CR-2 in the Mitigation Monitoring and Reporting Table, Attachment 1.

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VI. GEOLOGY AND SOILS: Would the project:

- a. Expose people or structures to 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. (Sources: 1, 2, & 3)

Discussion (a-i): The potential for and mitigation of impacts that may result from fault rupture in the project area are identified and addressed in the General Plan EIR, pg. 4.5-8. There are two known fault zones on either side of the Salinas River Valley. The Rinconada Fault system runs on the west side of the valley, and grazes the City on its western boundary. The San Andreas Fault is on the east side of the valley and is situated about 30 miles east of Paso Robles. The City of Paso Robles recognizes these geologic influences in the application of the California Building Code (CBC) to all new development within the City. However, since the project is limited to solar panels and ancillary electrical equipment and is an unoccupied facility, the likelihood of on-site ground rupture resulting in risk to people or structures is considered low. Nonetheless, the design of any structures on-site would incorporate measures to accommodate projected seismic loading, pursuant to existing CBC and local building regulations. There are no Alquist-Priolo Earthquake Fault Zones within City limits.

ii. Strong seismic ground shaking? (Sources: 1, 2, & 3)

 \boxtimes

 \boxtimes

Discussion (a-ii): Future structures within this project will be constructed to current CBC codes. The General Plan EIR identified impacts resulting from ground shaking as less than significant and provided mitigation measures that will be incorporated into the design of this project including adequate structural design and not constructing over active or potentially active faults. Therefore, impacts that may result

	from seismic ground shaking are consider	Potentially Significant Impact ed less than sign	Less Than Significant with Mitigation Incorporated hificant.	Less Than Significant Impact	No Impact
	iii. Seismic-related ground failure, including liquefaction? (Sources: 1, 2 & 3)			\boxtimes	
	Discussion (a.iii): Per the General Plan EI have a moderate potential for liquefaction conditions. To implement the EIR's miti standard condition to require submittal of analysis of liquefaction potential for all b recommendations of said reports into the of and ancillary electrical equipment and is a failure including liquefaction resulting in design of any structures on-site would i project.	a or other type of gation measure of soils and ge uilding permits design of the pr an unoccupied f risk to people of	of ground failure du s to reduce this pot otechnical reports, for new constructi oject. Since the pro acility, the likelihoor structures is cons	te to seismic ev ential impact, th which include on, and incorpo ject is limited to od of seismic-re idered low. Nor	ents and soil he City has a site-specific oration of the o solar panels elated ground hetheless, the
b.	Landslides?			\boxtimes	
	Discussion (b): Per the General Plan Safety I risk area for landslides. Therefore, potential in				nated a low-
c.	Result in substantial soil erosion or the loss of topsoil? (Sources: 1, 2, & 3)			\boxtimes	
	Discussion (c): Per the General Plan EIR the significant impacts are anticipated. A geote building permits that will evaluate the site spe study will determine the necessary grading t stability will not occur.	echnical/ soils cific soil stabili	analysis will be re ty and suitability of	equired prior to f the grading pro	issuance of posed. This
d.	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?				
	Discussion (d): See response to item VI.a.iii, a	lbove.			
e.	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?			\boxtimes	
	Discussion (e): See response to item VI.a.iii, a	lbove.			
f.	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?				\boxtimes

Potentially	Less Than	Less Than	No
Significant	Significant with	Significant	Impact
Impact	Mitigation	Impact	
	Incorporated		

Discussion (f): The project does not propose to use septic tanks or alternative wastewater disposal systems; therefore, no impacts would occur. No further analysis is warranted.

VII. GREENHOUSE GAS EMISSIONS: Would the project:						
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			\boxtimes			

Discussion (a): The project is a 4.0-megawatt solar photovoltaic (PV) generating facility that would convert solar energy into electric energy with the primary source of greenhouse gas emissions (GhG) being vehicle and equipment emissions for construction and maintenance activities. Once constructed, the electric energy produced by the project would reduce the dependency on fossil fuel-produced electric energy thereby providing a long-term GhG benefit. Considering that the project would operate as an unmanned facility and would require relatively minimal maintenance vehicle trips, and considering that limiting climate change is the focus of California's goals for implementing solar PV and other renewable energy technologies, project GhG emissions would be less than significant both individually and cumulatively.

b. Conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gasses?

warranted.

greenhouse gasses? Discussion (b): The City of Paso Robles Climate Action Plan (CAP) was adopted by the City Council in November, 2013. The CAP is a long-range plan to reduce greenhouse gas (GhG) emissions from City government operations and community activities within Paso Robles and prepare for the anticipated effects of climate change. The CAP will also help achieve multiple community goals such as lowering energy costs, reducing air pollution, supporting local economic development, and improving public health and quality of life (City of Paso Robles, 2013). Since the project consists of the installation of solar PV systems which will ultimately contribute to Paso Roble's achievement of its GhG emissions reduction target for government operations and community activities, the project would be consistent with the CAP. No further analysis is

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 \boxtimes

VIII. HAZARDS AND HAZARDOUS MATERIALS: Would the project:

a.	Create a significant hazard to the public or		
	the environment through the routine		\boxtimes
	transport, use, or disposal of hazardous		
	materials?		

Discussion (a): The proposed project is not expected to result in impacts from hazards and hazardous materials with respect to creating a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, nor is it expected to result in impacts from accidental release of materials into the environment. During construction, the proposed project would involve the transport of general construction materials as well as the materials necessary to construct the proposed PV arrays. Construction activities would involve the use of fuels and greases for the construction equipment, however, the use, storage, transport and disposal of these materials will be carried out in accordance with federal, state, and local laws, ordinances and regulations. Once installed, the solar panels would produce no waste during operation and would need to be cleaned approximately twice per year via water trucks with spray nozzles, with no chemical products being used.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?				
	Discussion (b): See response to VIII.a above.				
c.	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				
	Discussion (c): There are no existing or propose Youth Correctional Facility located approximat facility has been closed since 2008. Furthermore would convert solar energy into electric energy	ely 0.50 miles e, the project is	away from the project a solar photovoltation	ect site; howeve	r, the
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?				
	Discussion (d): The project site is not identified	l as a hazardou	s site per state Code	es.	
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?				
	Discussion (e): In accordance with the Airport property of the Paso Robles Municipal Airport Land Use Plan, but is subject to the Airport M designated by the Master Plan as future common Airport Master Plan. Additionally, the project is will be an unoccupied facility.	and is therefo aster Plan. The ercial/industria	re excluded from t e project site is loca l lease sites and is	he provisions o ated in an area t therefore consis	f the Airport hat has been tent with the
f.	For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?				
	Discussion (f): See response to VIII.e. above.				
g.	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	Discussion (g): The City does not have any add development would not interfere with emergen		cy response plans. A	As proposed, the	
h.	Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?				
	Discussion (h): The site is not located in an Robles Municipal Airport property and is also site. This project will not be impacted by wild	surrounded by			
IX	. HYDROLOGY AND WATER QUALITY: \	Would the proi	ect:		
a.	Violate any water quality standards or waste discharge requirements?			\boxtimes	
	Discussion (a): Water use during construct activities. The project will not result in releas considering these factors, the project will not he	sing water or v	waste water dischar	ge from the site	e. Therefore,
b.	Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., Would the production rate of pre-existing nearby wells drop to a level which would not support existing land uses or planned uses for which permits have been granted)? Would decreased rainfall infiltration or groundwater recharge reduce stream baseflow? (Source: 7)				
	Discussion (b): The project would not deplete as discussed in response IX.a above. Addition maintain similar drainage conditions as the ex- between them that will allow stormwater to im- be impacted by the project.	onally, the proxisting conditi	oject grading and d on. Once complete,	rainage plan is the solar pane	designed to ls have gaps
c.	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-			\boxtimes	

site? (Source: 10)

Discussion (c): The project grading and drainage plan is designed to maintain similar drainage conditions as the existing condition. Additionally, in compliance with State and local regulations, during construction erosion and/or stormwater control measures will be implemented during site disturbance; therefore the project is not expected to result in substantial erosion or siltation.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d.	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site? (Source: 10)				
	Discussion (d): Under existing conditions, there requires minimal grading, and the grading pla existing condition. Once complete, the solar p infiltrate the surface. Since the project will h patterns, there will not be substantially additional	n is designed anels have ga ave a negligi	to maintain simila ps between them the ble affect to the e	r drainage cond nat will allow st xisting terrain a	itions as the tormwater to and drainage
e.	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? (Source: 10)				
	Discussion (e): There are no drainage systems project grading and drainage plan is designed conditions. Once complete, the solar panels has the surface. Since the project will have a negligi- will not be substantially additional sources of ru	ed to maintai ve gaps betwe gible affect to	n similar drainage en them that will a	conditions as llow stormwater	the existing r to infiltrate
f.	Otherwise substantially degrade water quality?			\boxtimes	
	Discussion (f): The project's potential to degrad not have reasonably foreseeable potential to sub			K.a. above. The j	project does
g.	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?				\boxtimes
	Discussion (g): The project does not involve pla flood plain as currently mapped by Federal Eme				100-year
h.	Place within a 100-year flood hazard area structures which would impede or redirect flood flows?				\boxtimes
	Discussion (h): None of the site is within the 10 Emergency Management Agency (FEMA).	00-year flood p	plain as currently m	apped by Federa	ıl
i.	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?				
	Discussion (i): The project will have a negligib an unoccupied facility. Additionally, there are n			patterns, and the	site will be
j.	Inundation by mudflow?				\boxtimes

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	Discussion (j): In accordance with the Paso Rol near the project site. Therefore, the project cou				cated on or
k.	Conflict with any Best Management Practices found within the City's Storm Water Management Plan?				\boxtimes
	Discussion (k): The project will implement the Practices, and would therefore not conflict with			Plan - Best Man	agement
1.	Substantially decrease or degrade watershed storage of runoff, wetlands, riparian areas, aquatic habitat, or associated buffer zones?				\boxtimes
	Discussion (l): The project will incorporate al Additionally, the project would not affect the b the site since it will be setback a minimum of 5 project will not result in significant impacts to the	lue line draina 50-feet from th	ge channel or abutt e drainage and ripa	ing vegetation to	o the west of
X.]	LAND USE AND PLANNING: Would the pro	ject:			
a.	Physically divide an established community?				\boxtimes
	Discussion: The project would not physicall primarily by commercial/industrial and agricu Airport property.				
b.	Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?				
	Discussion: The site has a Public Facilities Development (AP-PD). The AP-PD zone requirenewable energy generation facility. A Devel greater than 10,000 square feet in size. With the with land use and zoning designations, and the Zoning Ordinance or other applicable regulation	ires a Conditic opment Plan (e approval of t herefore not b	(CU) (PD) is also require (PD) is also require the project, the solar	JP) to permit of ad since the pro facility would l	peration of a ject scope is be consistent
c.	Conflict with any applicable habitat conservation plan or natural community conservation plan?				\boxtimes
	Discussion: There are no habitat conservation p this area of the City. Therefore, there would be		community conserv	vation plans esta	blished in

XI. MINERAL RESOURCES: Would the project:

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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? (Source: 1)				
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? (Source: 1)				\boxtimes
	Discussion (a-b): There are no known mineral	resources at th	is project site.		
XI	I. NOISE: Would the project result in:				
a.	Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? (Source: 1)			\boxtimes	
	Discussion (a): Construction would generate activities. Most construction activity would oc the site preparation and PV assembly/installati to create the highest noise levels because of th would only occur during daytime hours. Ongo fans used to cool electrical equipment and to predominately commercial/industrial uses wh related to the noise levels in the vicinity will be	ccur within an on. In general, e operation of bing operations ransformers. A ich are not ser	approximately four- the grading phase heavy equipment. S would generate m Additionally, land un sitive to noise. Th	-month period e of project const Short-term const inimal noise, pr uses adjacent to	ncompassing ruction tends ruction noise imarily from the site are
b.	Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?			\boxtimes	
	Discussion (b): The levels of ground-born no low, and noise would only occur during daytin the project. Additionally, land uses adjacent to are not sensitive to groundborne vibration. A significant groundborne vibration or noise level	me hours of co o the site are p Aside from the	onstruction and wou predominately comr e Paso Robles Mur	ld cease upon c nercial/industria nicipal Airport,	ompletion of ll uses which
c.	A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?				
	Discussion (c): Construction noise impacts permanent increase of ambient noise. Operati daytime. These daytime noise levels would surrounding environment characteristics desc these factors, the project would not result in a s	on of the facil not be substa ribed in the re	ity would generate antial due to the l esponse to response	low noise leve ow-level noise e XII.a, above.	ls during the sources and Considering
d.	A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?			\boxtimes	

Potentially	Less Than	Less Than	No
Significant	Significant with	Significant	Impact
Impact	Mitigation	Impact	
	Incorporated		

Discussion (d): Construction would result in a temporary increase in ambient noise levels as described in response XII.a above. However, these activities would not be significant since the construction site is generally within the interior of the site and is surrounded by primarily commercial/industrial uses, including the airfield, which generates noise on a daily basis. Construction would only occur during daytime hours. The applicant would need to comply with noise standards in the zoning ordinance, and not create nuisance noise between 7:00 pm and 7:00 am.

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

expose people residing or working in the project area to excessive noise levels?
(Sources: 1, 4)

Discussion (e): The project site is located within the property of the Paso Robles Municipal Airport and is therefore excluded from the provisions of the Airport Land Use Plan, but is subject to the Airport Master Plan. The project site is located in an area that has been designated by the Master Plan as future commercial/industrial lease sites and is therefore consistent with the Airport Master Plan. Additionally, the project is not anticipated to result in excessive noise levels during construction or ongoing maintenance activities.

XIII. POPULATION AND HOUSING: Would the project:

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)? (Source: 1)				
	Discussion (a): The project is not expected to gene housing or commercial development, nor extension would be short term and are expected to be fille operations, the facility would typically be unmann needed basis and would typically require no more to is anticipated.	of roads or expa ed by the existin ed. Maintenance	nsion of infrastru g workforce with operations are e	cture. Construct hout relocation. xpected to be o	ion jobs During n an as-
b.	Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?				
	Discussion (b): The project would not displace any	housing. No hou	sing occurs on the	e project site.	
c.	Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?				\boxtimes

Discussion (c): The project would not displace people or housing. No housing occurs on the project site.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. PUBLIC SERVICES: 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 of the public services:					
a.	Fire protection? (Sources: 1,10)				\boxtimes
	Discussion (a): The project would be designed of Emergency Services (EMS) requirements for adherence to these requirements, the project por service levels. No new or modified government	or access, fire voices a low fire l	water supply, and v hazard and is not explanation of the second s	egetation manag	ement. With t capacity or
b.	Police protection? (Sources: 1,10)				\boxtimes
	Discussion (b): The project site is located in a public safety within the City limits. Construct demand on police services. Specifically, the p topped by one-foot of three-strand barbed wire result in an adverse impact on City of Paso Ro performance objectives, nor would the project the site. No new or modified government facility	ion and operati roject would b to control tres bles Police De result in the ne	on of the project we be enclosed with a spassing. As such, the partment response the red for new or modified	yould not genera six-foot-tall chai the project is not times, service ra- ified police facil	te a material in link fence t expected to tios, or other ities to serve
c.	Schools?				\boxtimes
	Discussion (c): As described in Response XIII growth. Therefore, no new demands on school			ed to generate po	opulation
d.	Parks?				\boxtimes
	Discussion (d): As described in Response XIII growth. Therefore, no new demands on park fa			ed to generate po	opulation
e.	Other public facilities? (Sources: 1,10)				\boxtimes
	Discussion (e): As described in Response XII growth, extend roads or other public infrastruc public facilities. It would not create new den demands for fire protection and protection serv	cture. The proj nands on publi	ect would not require facilities other the	ire new or physi	cally altered
XV	. RECREATION				
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?				\boxtimes

Discussion (a): As described in Response XIII.a, above, the project is not expected to generate population growth. Therefore, no increase is expected in the use of any park or recreational facility. Therefore, there would be no impact on park capacities, service levels or performance objective.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?				\boxtimes

Discussion (a-b): The project does not include recreational facilities. Furthermore, as described in Response XIII.a, above, the project is not expected to generate population growth. Therefore, it would not require the construction or expansion of any recreational facility.

XVI. TRANSPORTATION/TRAFFIC: Would the project:

a.	Conflict with an applicable plan, ordinance or policy establishing measures or				
	effectiveness for the performance of the				
	circulation system, taking into account all				
	modes of transportation including mass			\bowtie	
	transit and non-motorized travel and relevant	_	_	—	
	components of the circulation system,				
	including but not limited to intersections,				
	streets, highways and freeways, pedestrian				
	and bicycle paths, and mass transit?				

Discussion (a): Project-related vehicles typically would access the site by utilizing State Route 46 East, and construction fieldwork for the project would occur over an approximately four-month period during which the average number of construction workers is expected to be approximately 45 persons. Project construction worker and delivery traffic would incrementally add to existing traffic congestion on both State Route 46 East and Airport Road, but would be less than significant because of the relatively small number of trips generated and the short term of construction. Additionally, project operations would typically be unattended, with routine monitoring and maintenance on an as-needed basis. When needed, such site visits would typically require no more than one to two vehicle trips per day, which would add negligible traffic. Overall, the project would be developed in conformance with all applicable plans, policies, programs, and ordinances related to transportation and is expected to have a less than significant impact in regard to the circulation system.

b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Discussion (b): As described in Response XVI.a above, the proposed project would have minimal impact on traffic circulation during construction and operation. Minimal traffic would occur during project operation as a result of routine monitoring and maintenance. This long-term level of traffic from the project is less than significant and would not conflict with regional and local traffic management planning.

c.	Result in a change in air traffic patterns,		
	including either an increase in traffic levels		\boxtimes
	or a change in location that results in		
	substantial safety risks?		

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact		
	Discussion (c): This project will not require a change in air traffic patterns, result in an increase in air traffic levels, or change the location of the current air traffic patterns, therefore there would be no impacts to air traffic.						
d.	Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?						
	Discussion: The proposed access to the facility is a straight access road, which has been reviewed by the Emergency Services Department. The proposed construction equipment consists of one dozer, 2 loaders/backhoes, 2 graders, and various light-duty trucks. These types of vehicles are not uncommon to the area since the surrounding commercial/industrial uses are already frequented by large semi-trucks. Considering these factors, neither project construction nor operation would substantially increase hazards due to a design feature or incompatible use.						
e.	Result in inadequate emergency access?				\boxtimes		
	Discussion: The project will take access from Airport Road via an existing all-weather road on the airpor property. A new compacted all-weather roadway will connect to the solar facility. Within the facility, access roads will be a minimum of 25-feet wide and compacted for vehicle means of egress. The Emergency Services Department has reviewed the project and has determined access for this project is adequate Therefore, since this project has been designed to provide adequate access, there is no impact.						
f.	Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?						
	Discussion (a-f): There are no public transit, I project is not anticipated to have any impact o location, therefore there is no impact.						
XV	/II. UTILITIES AND SERVICE SYSTEMS:	Would the proj	ect:				
a.	Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?				\boxtimes		
	Discussion (a): The project would not dischapplicable to the project. Therefore, the project Regional Water Quality Control Board.						
b.	Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?						
	Discussion (b): During construction, water construction fire hydrant meter permit, with t						

Discussion (b): During construction, water would be provided through a nearby fire hydrant, under a construction fire hydrant meter permit, with the closest hydrant being located at Airport Way and Propeller Drive. Water needed for panel washing during the operating life of the facility would be obtained from a commercial water truck with spray nozzle, and would be performed approximately twice per year. No new water or wastewater facilities will need to be constructed or expanded for this project, therefore there are no

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	impacts.		-		
c.	Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?				
	Discussion (c): Existing drainage patterns would not be substantially altered by the project since the proposed grading is minimal. The final grading and drainage plan would be subject to approval by the City Engineering Department. Additionally, the City Engineer has determined that the project qualifies as exempt from Central Coast Water Board Post-Construction Stormwater Management Requirements. No new storm drainage facilities will need to be constructed or expanded for this project, therefore there are no impacts.				
d.	Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?			\boxtimes	
	Discussion (d): During construction, water would be provided through a nearby fire hydrant, under a construction fire hydrant meter permit, with the closest hydrant being located at Airport Way and Propeller Drive. Water needed for panel washing during the operating life of the facility would be obtained from a commercial water truck with spray nozzle, and would be performed approximately twice per year. Since the project's water needs are minimal for both construction and ongoing maintenance, the project's water use is considered less than significant.				
e.	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?				
	Discussion (e): See response to XVII.a. above.				
f.	Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?			\boxtimes	
	Discussion (f): The project is a solar photovoltaic generation facility that would convert solar energy into electric energy without substantial waste generation during operations. During construction, most debris would consist of recyclable materials such as wood pallets, plastic and paper packaging and scrap metal that can be taken to the nearby waste recycling center and all other non-recyclable construction debris being taken to the nearby landfill. The City landfill has adequate capacity to accommodate solid waste that will result during construction.				
g.	Comply with federal, state, and local statutes and regulations related to solid waste?				\boxtimes
	Discussion (g): The project will comply with al	ll federal, state	e, and local solid wa	ste regulations.	
XVIII. MANDATORY FINDINGS OF SIGNIFICANCE					
a.	Does the project have the potential to degrade the quality of the environment,			\boxtimes	

Potentially	Less Than	Less Than	No
Significant	Significant with	Significant	Impact
Impact	Mitigation	Impact	
	Incorporated		

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, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Discussion (a): As noted within this environmental document, and with the mitigation measures outlined in the document, the projects future development impacts related to habitat for wildlife species (e.g. San Joaquin Kit Fox) will be less than significant with mitigation incorporated. The project would not result in impacts to fish habitat or impacts to fish and wildlife populations. The site is vacant and shows evidence of being previously disturbed through regular disking practices for several years. Additionally, vegetative and underground cover is generally lacking on the site. Considering the disturbed nature of the site, impacts to fish, wildlife, or plant habitat are expected to be less than significant.

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

Discussion (b): The project site is located within the Paso Robles Municipal Airport property and is adjacent to vineyards to the north that are located in Zones 1,2, & 3 of the Airport Land Use Plan (ALUP). Since land within and surrounding the airport is restricted in development potential due to the compatibility with the Airport, there is not the potential for significant additional development in this area of the City. Considering these factors, the project's impacts on this environmental factor would be less than significant.

c.	Does the project have environmental effects			
	which will cause substantial adverse effects			\bowtie
	on human beings, either directly or	_	—	
	indirectly?			

Discussion (c): As noted within this environmental document, and with the mitigation measures outlined in the document, the project's potential to cause what may be considered substantial, adverse effects on human beings either directly or indirectly is less than significant. Therefore, the project will not cause substantial adverse effects on human beings, either directly or indirectly.

EARLIER ANALYSIS AND BACKGROUND MATERIALS.

Earlier analyses may be used where, pursuant to tiering, program EIR, or other CEQA process, one or more effects have been adequately analyzed in an earlier EIR or negative declaration. Section 15063 (c)(3)(D).

Earlier Documents Prepared and Utilized in this Analysis and Background / Explanatory Materials

Reference #	Document Title	Available for Review at:
1	City of Paso Robles General Plan	City of Paso Robles Community Development Department 1000 Spring Street Paso Robles, CA 93446
2	City of Paso Robles Zoning Code	Same as above
3	City of Paso Robles Environmental Impact Report for General Plan Update	Same as above
4	2007 Airport Land Use Plan	Same as above
5	City of Paso Robles Municipal Code	Same as above
6	City of Paso Robles Water Master Plan	Same as above
7	City of Paso Robles Urban Water Management Plan 2005	Same as above
8	City of Paso Robles Sewer Master Plan	Same as above
9	City of Paso Robles Housing Element	Same as above
10	City of Paso Robles Standard Conditions of Approval for New Development	Same as above
11	Uptown/Town Centre Specific Plan	Same as above
12	San Luis Obispo County Air Pollution Control District Guidelines for Impact Thresholds	APCD 3433 Roberto Court San Luis Obispo, CA 93401
13	San Luis Obispo County – Land Use Element	San Luis Obispo County Department of Planning County Government Center San Luis Obispo, CA 93408
14	USDA, Soils Conservation Service, Soil Survey of San Luis Obispo County, Paso Robles Area, 1983	Soil Conservation Offices Paso Robles, Ca 93446

Attachments:

- Mitigation Monitoring & Reporting Plan Vicinity Map 1. 2.
- 3.
- 4. 5.
- Project Description Project Site Plan Air Quality & GHG Assessment
- 6. Biological Report
- SJKF Habitat Evaluation, Revised by CDFW 1/24/2017 7.
- 8. Cultural and Paleontological Resources Survey



Mitigation Monitoring and Reporting Plan

Project File No./Name: Paso Robles Airport Solar Project Approving Resolution No.:____ by: X Planning Commission City Council

Date: April 25, 2017

The following environmental mitigation measures were either incorporated into the approved plans or were incorporated into the conditions of approval. Each and every mitigation measure listed below has been found by the approving body indicated above to lessen the level of environmental impact of the project to a level of non-significance. A completed and signed checklist for each mitigation measure indicates that it has been completed.

Explanation of Headings:

Туре:	. Project, ongoing, cumulative
Monitoring Department or Agency:	. Department or Agency responsible for monitoring a particular mitigation measure
Shown on Plans:	. When a mitigation measure is shown on the plans, this column will be initialed and dated.
Verified Implementation:	. When a mitigation measure has been implemented, this column will be initialed and dated.
Remarks:	. Area for describing status of ongoing mitigation measure, or for other information.

Mitigation Measure PD 16-008, CUP 16-007 (Airport Solar Project)	Туре	Monitoring Department or Agency	Shown on Plans	Verified Implementation	Timing/Remarks
BR-1. An environmental awareness training shall be presented by a qualified biologist to all construction personnel prior to start of project activities. The environmental training shall include an overview of special-status species and sensitive resources with potential to occur on the project site, habitat requirements, and their protection status.	Project	CDD	Grading Plan	CDD	Prior to site disturbance, grading permit issued
 BR-2. The following general measures are recommended to minimize impacts during active construction: a) The use of heavy equipment and vehicles shall be limited to the proposed project limits and defined staging areas/access points. The boundaries of each work area shall be clearly defined and marked with 	On- going	CDD	Grading Plan	CDD	Prior to site disturbance, grading permit issued

	1				Exhibit F
Mitigation Measure PD 16-008, CUP 16-007 (Airport Solar Project)	Туре	Monitoring Department or Agency	Shown on Plans	Verified Implementation	Timing/Remarks
high visibility fencing. No work shall occur outside these limits. b) Secondary containment such as drip pans shall be used to prevent leaks and spills of potential					
 contaminants. c) Washing of concrete, paint, or equipment, and refueling and maintenance of equipment shall occur only in designated areas. Sandbags and/or absorbent pads shall be available to prevent water and/or spilled fuel from leaving the site. 					
 d) Construction equipment shall be inspected by the operator regularly to ensure that equipment is in good working order and no fuel or lubricant leaks are present. 					
BR-3. An appropriately-timed botanical survey(s) will be conducted by a qualified botanist during the typical blooming period (i.e., April - June) for the potentially occurring sensitive plant species listed in Section 3.2.1 of the Biological Report. The survey will be conducted in all areas proposed for temporary or permanent construction activity, including temporary access roads, staging yards, and laydown areas.	Project	CDD	Grading Plans	CDD	Prior to issuance of grading permit
 As a primary goal, any sensitive plant species encountered during the survey(s) shall be flagged for avoidance and construction activities shall avoid the marked areas to the maximum extent feasible. 					
 If no special-status plants are observed, no further action is required. If sensitive plant individuals or communities cannot be avoided during construction (i.e., if avoidance is deemed infeasible), a mitigation plan for impacts to special-status plants shall be developed prior to the onset of 					

Mitigation Measure PD 16-008, CUP 16-007 (Airport Solar Project)	Туре	Monitoring Department or Agency	Shown on Plans	Verified Implementation	Timing/Remarks
construction and implemented during construction.					
At a minimum, the Plan shall:					
 Discuss the proposed construction methods, construction schedule, and the implementation schedule of activities proposed as part of the Plan. 					
 Quantify the anticipated acreages of impact to special- status plant species. 					
 Identify each special-status plant species observed on site, including a description of the mitigation activities proposed for each. As appropriate, the measures shall include: 					
 A detailed description of topsoil salvage procedures and long-term soil stockpile 					
storage methods;					
 Methods and timing of any proposed seed collection and storage; 					
 Locations and demarcation of full-time avoidance areas during construction; 					
 Locations and methods for restoration, replanting and/or reseeding (e.g., decompaction, recontouring, scarification, mulching, hand broadcasting, hydroseeding, etc.); and, 					
 Short- and/or long-term monitoring protocols and/or vegetative growth success criteria for restoration. 					
 Include a requirement for photographic documentation and a post-implementation report. 					
The Plan shall be submitted for approval to CDFW and the City prior to the onset of construction.					

				1	<u> </u>
Mitigation Measure PD 16-008, CUP 16-007 (Airport Solar Project)	Туре	Monitoring Department or Agency	Shown on Plans	Verified Implementation	Timing/Remarks
BR-4. All temporarily disturbed areas (e.g., access routes, staging areas, and stockpile areas) will be located at a minimum of 50 feet from any water feature (i.e., the blue line drainage and upland swale). This distance should be maximized wherever feasible.	Project	CDD	Grading Plans & Building Plans		Prior to issuance of grading permit and Building Permit
BR-5. All exterior lighting will be placed or shielded to avoid lighting of open space areas and/or drainages. No permanent night lighting will be installed, except for security and maintenance needs of the constructed facility. Temporary construction lighting will be kept to the minimum amount necessary and shall be directed toward active work areas and away from open spaces and/or drainages.	Project	CDD	Building Plans		Prior to issuance of Building Permit
BR-6. A qualified biologist shall conduct a pre-activity survey immediately prior to the initiation of initial project activities to ensure special-status wildlife species are not present during the start of construction. In the event sensitive wildlife species are found, they shall be allowed to leave the area on their own volition, relocated (as permitted) to suitable habitat areas located outside the work area(s), or resources agencies will be contacted for further guidance. Pre-activity surveys will include a general assessment for all sensitive resources with potential to be impacted, but focusing on SJKF and associated potential den sites.	Project	CDD	Grading Plans & Building Plans		Prior to site disturbance/ issuance of grading permit
BR-7. If work is planned to occur between February 1 and September 15, a qualified biologist shall survey the area for nesting birds within one week prior to activity beginning on site. If nesting birds are located on or near the proposed project site, they shall be avoided until they have successfully fledged. A non- disturbance buffer of 50 feet will be placed around non-listed,	Project	CDD	Grading Plans	CDD	Prior to site disturbance/ issuance of grading permit

					Exhibit I
Mitigation Measure PD 16-008, CUP 16-007 (Airport Solar Project)	Туре	Monitoring Department or Agency	Shown on Plans	Verified Implementation	Timing/Remarks
passerine species, and a 250-foot buffer will be implemented for raptor species. All activity will remain outside of that buffer until a qualified biologist has determined that the young have fledged or that proposed construction activities would not cause adverse impacts to the nest, adults, eggs, or young. If special-status avian species are identified, no work will begin until an appropriate buffer is determined in consultation with the local CDFW biologist, and/or the USFWS.					
 BR-8. In accordance with the County Guide to SJKF Mitigation Procedures Under CEQA, the project owner shall adopt the Standard Kit Fox CEQA Mitigation Measures and shall be included on development plans. The following summarizes those that are applicable to this project: The applicant shall mitigate for the loss of kit fox habitat at a ratio of 3:1 or at a ratio as determined by the California Department of Fish and Wildlife, by one the following methods: 1. Establishing a conservation easement on-site or off-site in a suitable San Luis Obispo County location and provide a non- wasting endowment for management and monitoring of the property in perpetuity; 	Project	CDD CDFW		Notes shown on construction documents. Approval letter from CDFW.	Prior to issuing grading permit.
 Depositing funds into an approved in-lieu fee program; or Purchasing credits in an approved conservation bank in San Luis Obispo County. A maximum 25 mph speed limit shall be required at the project site during construction activities. All construction activities shall cease at dusk and not start before dawn. A qualified biologist shall be on-site immediately prior to initiation of project activities to inspect for any large burrows 					

Mitigation Measure PD 16-008, CUP 16-007 (Airport Solar Project)	Туре	Monitoring Department or Agency	Shown on Plans	Verified Implementation	Timing/Remarks
(e.g., known and potential dens) and to ensure no wildlife are injured during project activities. If dens are encountered, they should be avoided as discussed below.					
• Exclusion zone boundaries shall be established around all known and potential kit fox dens.					
All excavations deeper than 2 feet shall be completely covered at the end of each working day.					
• All pipes, culverts, or similar structures shall be inspected for SJKF and other wildlife before burying, capping, or moving.					
• All exposed openings of pipes, culverts, or similar structures shall be capped or temporarily sealed prior to the end of each working day.					
• All food-related trash shall be removed from the site at the end of each work day.					
 Project-related equipment shall be prohibited outside of designated work areas and access routes. 					
No firearms shall be allowed in the project area.					
Disturbance to burrows shall be avoided to the greatest extent feasible.					
No rodenticides or herbicides should be applied in the project area.					
 Permanent fences shall allow for SJKF passage through or underneath (i.e., an approximate 4-inch passage gap shall remain at ground level). 					
 CR-1. A trained and qualified archaeological monitor should perform cultural resources monitoring of any ground disturbing activities associated with the Project that have the potential to impact cultural resources (i.e. grading, trenching). Monitoring is not effective during activities where soil matrix is not visually exposed (i.e. pile-driving for installation of solar pylons). The monitor will have the ability to 	Project	CDD	Grading Plans & Building Plans	CDD	Prior to site disturbance/ issuance of grading permit

Mitigation Measure PD 16-008, CUP 16-007 (Airport Solar Project)	Туре	Monitoring Department or Agency	Shown on Plans	Verified Implementation	Timing/Remarks
redirect construction activities to ensure avoidance of significant impacts to cultural resources.					
• During the initial vegetation removal and grading up to five feet below current ground surface of the site, we recommend full time cultural resources monitoring. The project archaeologist, in coordination with the City of Paso Robles, may re-evaluate the necessity for monitoring after the initial five feet of excavations have been completed.					
• In the event that these resources are inadvertently discovered during ground-disturbing activities, work must be halted within 50 feet of the find until it can be evaluated by a qualified archaeologist. Construction activities could continue in other areas. If the discovery proves to be significant, additional work, such as data recovery excavation or fossil recovery, may be warranted and would be discussed in consultation with the appropriate regulatory agency(ies).					
Any potentially significant artifacts, sites or features observed shall be collected and recorded in conjunction with best management practices and professional standards.					
 Any cultural items recovered during mitigation should be deposited in an accredited and permanent scientific institution for the benefit of current and future generations. 					
• A report documenting the results of the monitoring efforts, including any data recovery activities and the significance of any cultural resources will be prepared and submitted to the appropriate City and County personnel.					
 Procedures of conduct following the discovery of human remains on non-federal lands have been mandated by California Health and Safety Code §7050.5, PRC §5097.98 and the California Code of Regulations (CCR) §15064.5(e). According to the provisions in CEQA, should human remains be encountered, all work in the immediate vicinity of the burial must cease, and any necessary steps to insure the integrity of the immediate area must be taken. The Orange 					

Exhihit R **Mitigation Measure** Monitoring Verified PD 16-008, CUP 16-007 Department Shown on Plans Timing/Remarks Type Implementation (Airport Solar Project) or Agency County Coroner will be immediately notified. The Coroner must then determine whether the remains are Native American. If the Coroner determines the remains are Native American, the Coroner has 24 hours to notify the NAHC, who will, in turn, notify the person they identify as the most likely descendent (MLD) of any human remains. Further actions will be determined, in part, by the desires of the MLD. The MLD has 48 hours to make recommendations regarding the disposition of the remains following notification from the NAHC of the discovery. If the MLD does not make recommendations within 48 hours, the owner shall, with appropriate dignity, reinter the remains in an area of the property secure from further disturbance. Alternatively, if the owner does not accept the MLD's recommendations, the owner or the descendent may request mediation by the NAHC CR-2. CDD Grading Plans & CDD Project Prior to site A trained and gualified paleontological monitor should **Building Plans** disturbance/issuance • perform paleontological monitoring of any ground disturbing of grading permit activities associated with the Project that have the potential to impact paleontological resources (i.e. grading, trenching). Monitoring is not effective during activities where sediment is not visually exposed (i.e. pile-driving for installation of solar pylons). The monitor will have the ability to redirect construction activities to ensure avoidance of significant impacts to paleontological resources. The project paleontologist may re-evaluate the necessity for paleontological monitoring after 50% or greater of the excavations have been completed. Any potentially significant fossils observed shall be collected • and recorded in conjunction with best management practices and SVP professional standards. Any fossils recovered during mitigation should be deposited • in an accredited and permanent scientific institution for the benefit of current and future generations.

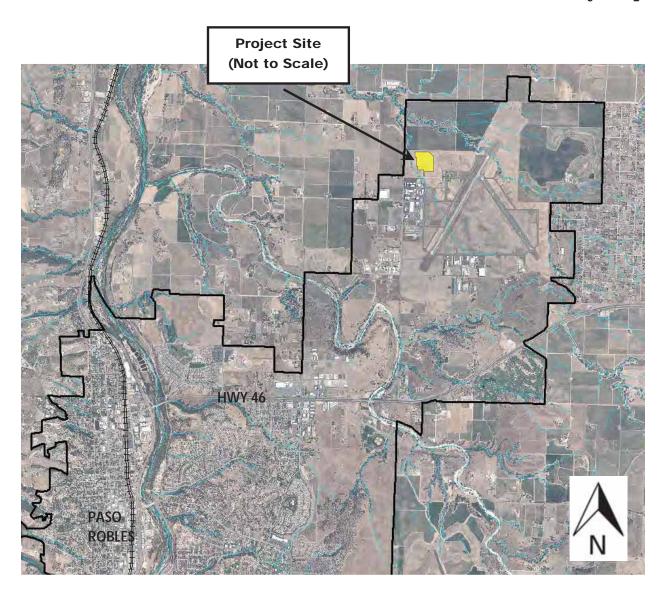
Mitigation Measure PD 16-008, CUP 16-007 (Airport Solar Project)	Туре	Monitoring Department or Agency	Shown on Plans	Verified Implementation	Timing/Remarks
• A report documenting the results of the monitoring, including any salvage activities and the significance of any fossils will be prepared and submitted to the appropriate City and County personnel.					

(add additional measures as necessary)

Explanation of Headings:

Туре:	Project, ongoing, cumulative
Monitoring Department or Agency:	Department or Agency responsible for monitoring a particular mitigation measure
Shown on Plans:	When a mitigation measure is shown on the plans, this column will be initialed and dated.
Verified Implementation:	When a mitigation measure has been implemented, this column will be initialed and dated.
Remarks:	Area for describing status of ongoing mitigation measure, or for other information.

Exhibit B Attachment 2 Vicinity Map



Paso Robles Airport Solar Project

Project Description

Project Summary

The Paso Robles Airport Solar project is a 4-MW (AC) solar photovoltaic power plant on 24.6 acres within the property of the Paso Robles Airport, in the city of Paso Robles.

Site and Surrounding Land Uses

The project site consists of vacant land maintained clear of significant vegetation. Agricultural land is present to the north; vacant lands owned by the airport are to the west and east; the airport is to the southeast, and an industrial area is to the south. Northwest of the site is the historic Estrella Adobe Church and cemetery.

The site's General Plan land use designation is PF (Public Facilities) and zoning is AP PD (Airport). Surrounding land use designations are PF to the east, west, and southeast; BP (Business Park) to the north and south; and AG (Agriculture) to the northwest. Surrounding zoning is AP PD, with the Estrella Adobe Church having a zoning of RA PD (Residential Agriculture).

Site Improvements

The solar field would include the following primary components:

- Fixed-tilt or tracking panels, maximum 8 feet in height, organized in north south rows approximately 20 feet apart (from center of each row)
- Associated electrical equipment, such as inverters (7.5 feet in height). The project would connect to the power grid at an existing aboveground powerline south of the site.
- Access roads and fencing. Primary access would be from an existing gravel road connecting Airport Road with the CALFIRE facility within the airport. Fencing would consist of 6-foot-tall chain link topped by 1 foot of three-strand barbed wire.

During construction, the project would require approximately 2,000 cubic yards of grading, with no import or export of soil anticipated. Given the size of the site and the mild terrain, this is considered very light grading. The site grounds will be hydro seeded within the solar row spacing and surrounding space. The interior access roadway will not be hydro seeded in order to maintain a clear path of travel. The solar site will not be sterilized and no chemicals will be used.

Access and Circulation

The site is accessed from Airport Road via an existing gravel road on the airport parcel. A new compacted all-weather roadway would connect to the site. Within the site, access roads (minimum 25 feet wide) compacted for vehicle means of egress would run through the center of the field.

Assessment of Glare

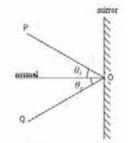
The project would not produce any significant amount of glare. A solar panel comprises numerous solar cells. A solar cell differs from a typical reflective surface in that it has a microscopically irregular surface designed to trap the rays of sunlight for the purposes of energy production. The intent of solar technology is to increase efficiency by absorbing as much light as possible (which further reduces reflection and glare). Solar panels are designed to perpendicular to incident solar radiation, thereby maximizing solar cell efficiency and potential energy output. During midday conditions, when the sun is high in the sky, the law of reflection indicates that the reflected ray would be at an equally low angle and reflected in a direction toward the light source or back into the atmosphere away from receptors on the ground (see graphic on

following page). When the sun is low on the horizon (near dawn or dusk), the sun's angle in the sky is low; however, reflected rays would still be directed away from ground-level receptors.

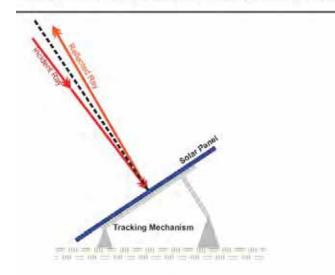
The panels would not be expected to cause visual discomfort or impairment of vision for airport users because the panels are designed to absorb as much sunlight as possible and therefore would have minimal reflectivity. The type of glare that could be expected in the most extreme conditions, when the sun is low in the sky, is a level of veiling reflection that may cause viewers to be less able to distinguish levels of contrast, but not cause a temporary loss of vision.

Solar fields have successfully and safely been implemented within and in the immediate vicinity of numerous airports, including Indianapolis International Airport (20 MW) and Denver International Airport (4 MW). SunEdison also constructed a similar facility (20 MW), within closer range of runways, at the Hemet-Ryan Airport in Riverside County. Such examples show the lack of conflict between solar fields and airport operations.

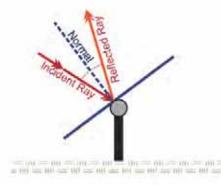
For the reasons described above, glare would not be a significant issue of concern from the proposed project.



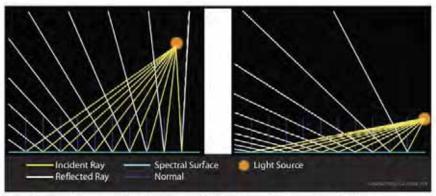
The Law of Reflection - which states that the direction of incoming light (the incident ray), and the direction of outgoing light reflected (the reflected ray) make the same angle with respect to the surface normal (perpendicular to the reflecting surface), thus the angle of incidence equals the angle of reflection; this is commonly stated as $\theta_i = \theta_i$.



Incident and reflected rays of light that would result from a optimally oriented solar panel on a variable tilt single axis tracking mechanism.



Incident and reflected rays of light that would result from the fixed tilt single axis tracker array.



This diagram illustrates how the angle of the reflected ray reacts to a light source moving to a lower horizontal azimuth. The conditions in the right illustration would increase the possibility of glare to a terrestrial-based viewer.

Solar Panels & Glare

Environmental Information Form

18. If the project involves a variance, conditional use, or rezoning application, state this on a separate sheet and indicate clearly why the application is required and your justification for it.

Response: A Conditional Use Permit (Minor) is required to permit development of a solar energy generation facility within the AP zone. Within the AP zone, Table 21.16.200 of the Municipal Code permits by right certain public utilities facilities (wells, pump stations, switching and relay boxes; pipelines and power transmission lines), while requiring a use permit for others (water tanks, electrical substations). The proposed solar field will contain elements such as inverters which may be considered similar to electrical substations, and which require a use permit.

- 35. On a separate sheet, indicate the following information about the project:
 - a. If commercial, state the type, gross square footage of sales area, number of shifts, estimated employment per shift, and provisions for loading facilities;
 - b. If industrial, state the type, hours of operation, number of shifts, estimated employment per shift, applicable shipping and delivery requirements, and provisions for loading facilities.

Response: The facility will operate automatically during daylight hours and will be unmanned, with maintenance and security staff being on-site largely on an as-needed basis. Such site visits would typically require no more than one to two vehicle trips per day. During operations, no regular shipping/delivery activities would occur.

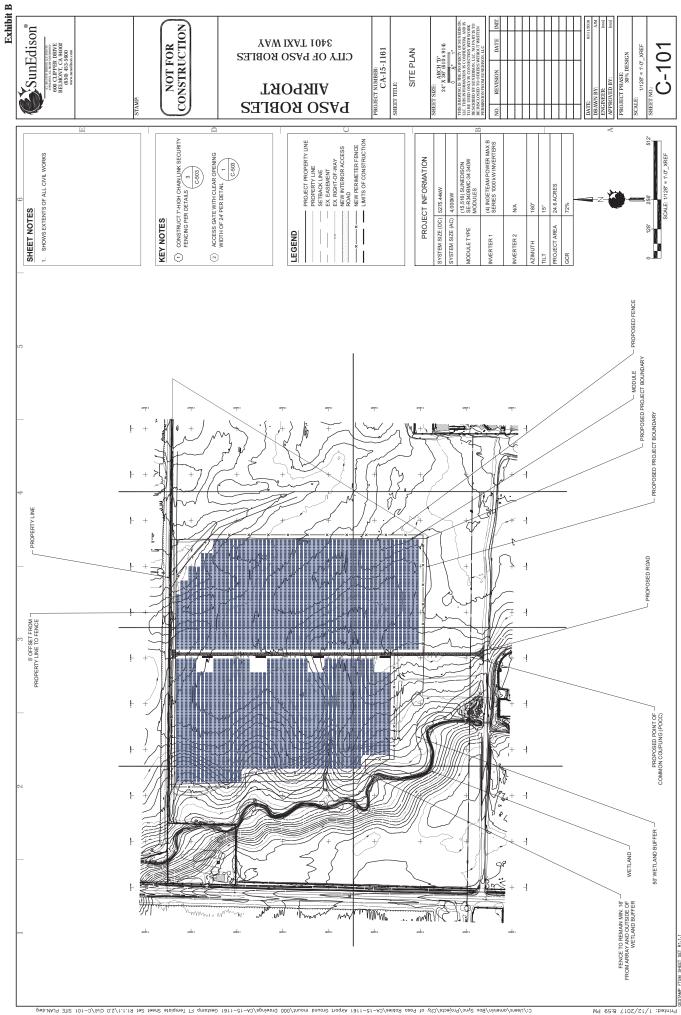
36. On a separate sheet, describe the following existing conditions of the site:

- a. Soil stability, vegetation, and animals on and around the site
- b. Topography (slope) of the site and any unusual landform features
- c. Structures on the site and their uses
- d. Cultural, historical, and scenic aspects of the site
- e. Surrounding land uses (residential, commercial, etc.) and their intensities (single family houses, apartments, shops, agricultural, etc.)
- f. Scale of surrounding development (height, frontage, setback, rear yard, etc.)
- g. Existing onsite or adjacent overhead utilities. Undergrounding of all overhead utilities may be required with project approval.

Response: The site is vacant, flat, and contains no significant vegetation or wildlife. There are no identified cultural, historical, or scenic aspects of the site. Surrounding land uses include the Paso Robles Airport to the southeast, industrial areas to the south, vacant lands owned by the airport to the east and west, and agricultural land to the north. Northwest of the site is the historic Estrella Adobe and church cemetery. Existing nearby overhead utilities include a powerline servicing the airport, which will be the point of connection of the solar field to the electrical grid.

37. Are there any existing oak trees on site? If so please show their location, trunk diameter size, and any which are proposed for removal. This information may be included on any of the submitted site plans if it can be clearly shown. If there are no oak trees located on the site, please state so on the plans.

Response: The project will avoid impacts to any oak trees on the site.



Paso Robles Airport Solar

Analysis by: Giroux & Associates

24.6 acres – Climate Zone 4

San Luis Obispo County Air Pollution Control District Electric Utility: Pacific Gas & Electric

CalEEMod land use is "user defined industrial" whereby all construction activities and equipment types require user input. Site size was input manually.

Per CalEEMod User Guide, the following road dust parameters were used to override the statewide defaults:

9.3 for Material Silt Content (%)	instead of 4.3 statewide default
0.1 for Material Moisture Content (%)	instead of 0.5 statewide default
32.4 for Mean Vehicle Speed (mph)	instead of 40 statewide default

Operational emissions were based on 2 round trips per week for maintenance. Because operational emissions are calculated as a daily input, 1 round trip per day as a max was modeled. Because vehicle mix is light-duty pickup truck, vehicle fleet mix was modified. All types of vehicles except light duty trucks were eliminated, operational trips are 100% light duty trucks. CalEEMod modified so that "Non Res" C-W Trip% = 100.

Mileage Assumptions:

- 65 miles travel from within SLOAPCD basin to get to Paso Robles (assuming panels come from the south)
- On-road truck mileage for solar panel delivery was assumed to begin upon entry to the SLO Air Basin with a 65-mile one-way trip length. Other construction related items such as sand and gravel and equipment delivery were assumed to require a 10-mile one-way trip length.

Phase Name and	Equipment
Duration	Lymphone
	1 Dozer
Site Dron and Creding	2 Loader/Backhoes
Site Prep and Grading (40 days)	2 Graders
(40 days)	10 person worker crew or 20 one way trips
	10 truck deliveries per day at 20 miles round trip
	3 Trenchers
	3 Welders
	2 Rough Terrain Forklifts
PV Installation	1 Generator Set
(80 days)	2 Loader/Backhoes
	35 person worker crew or 70 one way trips
	5 delivery trucks per day 20 miles round trip
	40 truck deliveries at 130 miles round trip (solar panels)

Construction Activity Equipment Fleet

CONSTRUCTION EMISSIONS THRESHOLDS

The SLOAPCD has developed specific daily and quarterly numeric construction thresholds. Daily thresholds are for projects that would be completed in less than one quarter (90 days). The SLOAPCD's quarterly construction thresholds are applicable to the proposed project because construction would last for more than one quarter. These include:

ROG and NOX Emissions

• Quarterly – Tier 1: For construction projects lasting more than one quarter, exceedance of the 2.5 tons per quarter threshold requires Standard Mitigation Measures and Best Available Control Technology (BACT) for construction equipment. If implementation of the Standard Mitigation and BACT measures cannot bring the project below the threshold, off-site mitigation may be necessary; and,

• Quarterly – Tier 2: For construction projects lasting more than one quarter, exceedance of the 6.3 tons per quarter threshold requires Standard Mitigation Measures, BACT, implementation of a Construction Activity Management Plan (CAMP), and off-site mitigation. Diesel Particulate Matter (DPM) Emissions

Diesel Particulate Matter (DPM) Emissions

• Quarterly – Tier 1: For construction projects lasting more than one quarter, exceedance of the 0.13 tons per quarter threshold requires Standard Mitigation Measures, BACT for construction equipment; and,

• Quarterly – Tier 2: For construction projects lasting more than one quarter, exceedance of the 0.32 ton per quarter threshold requires Standard Mitigation Measures, BACT, implementation of a CAMP, and off-site mitigation.

Fugitive Particulate Matter (PM10), Dust Emissions

• Quarterly: Exceedance of the 2.5 tons per quarter threshold requires Fugitive PM-10 Mitigation Measures and may require the implementation of a CAMP.

Construction Year	Maximum Pe	Maximum Per Year (tons/quarter)		
	ROG + NOX	DPM	Dust	
2017	2.29 tons/yr (1.26 tons/quarter)	0.11	1.84	
SLOAPCD Quarterly Tier 1 Thresholds (ton/quarter)	2.5	0.13	2.5	
SLOAPCD Quarterly Tier 2 Thresholds (ton/quarter)	6.3	0.32	2.5	

Project Construction Maximum Air Pollutant Emissions

DPM equal to exhaust PM-2.5 and dust equal to fugitive PM-10 from CalEEMod. Maximum emissions include on-site and off-site emissions.

THRESHOLDS OF SIGNIFICANCE FOR OPERATIONAL EMISSIONS IMPACTS

SLOAPCD Thresholds	Threshold	
Pollutant	Daily	Annual
Ozone Precursors (ROG + NOx)	25 lbs/day	25 tons/year
Diesel Particulate Matter (DPM)	1.25 lbs/day	-
Fugitive Particulate Matter (PM10)	25 lbs/day	25 tons/year
СО	550 lbs/day	-
Greenhouse Gases	-	1,150 MT CO2e/year

Project Daily Operational Impacts

(lbs/da)	y)
OC + NOX	DPM

Source	ROG + NOX	DPM	Dust	CO
Total	0.13	<0.1	<0.1	0.45
SLOAPCD Threshold	25	1.25	25	550

Project Annual Operational Impacts

(tons/year)					
SourceROG + NOXDustCO2e					
Total	<0.1	<0.1	1.15		
SLOAPCD Threshold	25	25	1,150		

GHG CONSTRUCTION EMISSIONS

229.3 MT Year (2017) CO₂(e)

NET GHG EMISSIONS DISPLACEMENT (OFF-SET)

4.0 MW rated plant with a 20% solar capacity factor, would annually produce 17,520 megawatthour (MW-HR) of electrical energy. The generation of 1 MW-HR of electricity in California produces an average of 0.331 MT of $CO_2(e)$. The off-set created by 17,520 MW-HR per year of solar generation would be 5,800 MT $CO_2(e)$. The corresponding operational GHG emissions would be approximately 13 metric tons of $CO_2(e)$. The net GHG benefit for this project would be more than 5,785 MT $CO_2(e)$ per year.

The displacement/off-set effect of solar power is enhanced by the fact that the displaced generation reduction would likely occur at fossil-fueled power plants that have higher GHG emission rates than 0.331 MT per MW-HR. The most highly efficient combined cycle gas-fired plant in California generates 0.35 MT per MW-HR. Coal-fired plants in the western United States may produce almost 1.0 MT of CO₂(e) per MW-HR. Therefore, gas turbine or coal-fired plants would produce from 6,000 to 18,000 MT without the proposed project.

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1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
User Defined Industrial	24.60	User Defined Unit	24.60	0.00	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	3.2	Precipitation Freq (Days)	44
Climate Zone	4			Operational Year	2019
Utility Company	Pacific Gas & Electric Co	mpany			
CO2 Intensity (Ib/MWhr)	641.35	CH4 Intensity (Ib/MWhr)	0.029	N2O Intensity (Ib/MWhr)	0.006

1.3 User Entered Comments & Non-Default Data

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Project Characteristics -

Land Use - site size

Construction Phase - 40 days grading, 80 days construction

Off-road Equipment -

Off-road Equipment - Construction: 1 gen set, 2 loaders/backhoes, 3 welders, 3 trenchers, 2 rough terrain forklifts

Off-road Equipment - Grading: 2 graders, 1 dozer, 2 loader/backhoes

Trips and VMT - 20 worker trips grading, 70 trips construction, 40 haul trips at 130 miles round trips (within air basin)

On-road Fugitive Dust - SLO Region Valies per CALEEMOD user guide .25 mile unpaved roads

Grading -

Vehicle Trips - 2 trips per week modeled as 1 per day max

Road Dust - reflects .25 miles unpaved road and CARBs 2.0 (Ib PMT/VMT) and 0.2 (Ib PM2.5/VMT)

Construction Off-road Equipment Mitigation -

Fleet Mix - Pickup trucks LDT2

Table Name	Column Name	Default Value	New Value
tblConstDustMitigation	WaterUnpavedRoadMoistureContent	0	0.1
tblConstDustMitigation	WaterUnpavedRoadVehicleSpeed	40	32.4
tblConstructionPhase	NumDays	370.00	80.00
tblConstructionPhase	NumDays	35.00	40.00
tblFleetMix	HHD	0.02	0.00
tblFleetMix	LDA	0.55	0.00
tblFleetMix	LDT1	0.03	0.00
tblFleetMix	LDT2	0.20	1.00
tblFleetMix	LHD1	0.03	0.00
tblFleetMix	LHD2	7.8720e-003	0.00
tblFleetMix	МСҮ	5.6300e-003	0.00
tblFleetMix	MDV	0.13	0.00

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tblFleetMix	МН	1.8520e-003	0.00
tblFleetMix	MHD	0.01	0.00
tblFleetMix	OBUS	2.4040e-003	0.00
tblFleetMix	SBUS	8.2500e-004	0.00
tblFleetMix	UBUS	1.3200e-003	0.00
tblLandUse	LotAcreage	0.00	24.60
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	3.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	0.00
tblOnRoadDust	HaulingPercentPave	100.00	99.80
tblOnRoadDust	HaulingPercentPave	100.00	99.80
tblOnRoadDust	MaterialMoistureContent	0.50	0.10
tblOnRoadDust	MaterialMoistureContent	0.50	0.10
tblOnRoadDust	MaterialSiltContent	8.50	9.30
tblOnRoadDust	MaterialSiltContent	8.50	9.30
tblOnRoadDust	MeanVehicleSpeed	40.00	32.40
tblOnRoadDust	MeanVehicleSpeed	40.00	32.40
tblOnRoadDust	VendorPercentPave	100.00	98.70
tblOnRoadDust	VendorPercentPave	100.00	98.70
tblOnRoadDust	WorkerPercentPave	100.00	98.00
tblOnRoadDust	WorkerPercentPave	100.00	98.00
tblProjectCharacteristics	OperationalYear	2018	2019
tblRoadDust	RoadPercentPave	100	98
l		•	

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tblTripsAndVMT	HaulingTripLength	20.00	130.00
tblTripsAndVMT	HaulingTripNumber	0.00	40.00
tblTripsAndVMT	VendorTripLength	5.00	20.00
tblTripsAndVMT	VendorTripLength	5.00	20.00
tblTripsAndVMT	VendorTripNumber	0.00	10.00
tblTripsAndVMT	VendorTripNumber	0.00	5.00
tblTripsAndVMT	WorkerTripNumber	13.00	20.00
tblTripsAndVMT	WorkerTripNumber	0.00	70.00
tblVehicleTrips	CW_TTP	0.00	100.00
tblVehicleTrips	WD_TR	0.00	2.00

2.0 Emissions Summary

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2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year					ton	s/yr							MT	/yr		
2017	0.2503	2.0368	1.4153	2.5400e- 003	1.8365	0.1182	1.9547	0.2445	0.1110	0.3555	0.0000	228.1641	228.1641	0.0463	0.0000	229.3209
Maximum	0.2503	2.0368	1.4153	2.5400e- 003	1.8365	0.1182	1.9547	0.2445	0.1110	0.3555	0.0000	228.1641	228.1641	0.0463	0.0000	229.3209

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year					ton	s/yr							MT	/yr		
2017	0.2503	2.0368	1.4153	2.5400e- 003	1.8365	0.1182	1.9547	0.2445	0.1110	0.3555	0.0000	228.1639	228.1639	0.0463	0.0000	229.3207
Maximum	0.2503	2.0368	1.4153	2.5400e- 003	1.8365	0.1182	1.9547	0.2445	0.1110	0.3555	0.0000	228.1639	228.1639	0.0463	0.0000	229.3207

	ROG	NOx	со	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

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Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	1-2-2017	4-1-2017	1.2618	1.2618
2	4-2-2017	7-1-2017	0.9926	0.9926
		Highest	1.2618	1.2618

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					ton	s/yr							МТ	/yr		
Area	4.0000e- 005	0.0000	4.2000e- 004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	8.1000e- 004	8.1000e- 004	0.0000	0.0000	8.6000e- 004
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0107	5.2600e- 003	0.0535	1.0000e- 005	0.0000	4.0000e- 005	4.0000e- 005	0.0000	4.0000e- 005	4.0000e- 005	0.0000	1.1450	1.1450	2.7000e- 004	0.0000	1.1517
Waste	F;		1			0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Water	F;		1			0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0108	5.2600e- 003	0.0539	1.0000e- 005	0.0000	4.0000e- 005	4.0000e- 005	0.0000	4.0000e- 005	4.0000e- 005	0.0000	1.1458	1.1458	2.7000e- 004	0.0000	1.1525

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2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO		igitive PM10	Exhaust PM10	PM10 Total	Fugit PM2		naust M2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category		-				ton	s/yr								М	T/yr		
	4.0000e- 005	0.0000	4.2000 004	e- 0.00	00		0.0000	0.0000		0.	0000	0.0000	0.0000	8.1000e- 004	8.1000e- 004	0.0000	0.0000	8.6000e- 004
Energy	0.0000	0.0000	0.000	0.00	00		0.0000	0.0000		0.1	0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0107	5.2600e- 003	0.053	5 1.000 00		.0000	4.0000e- 005	4.0000e- 005	0.00		000e- 005	4.0000e- 005	0.0000	1.1450	1.1450	2.7000e- 004	0.0000	1.1517
Waste	9,						0.0000	0.0000		0.1	0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Water	9,						0.0000	0.0000		0.1	0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0108	5.2600e- 003	0.053	9 1.000		.0000	4.0000e- 005	4.0000e- 005	0.00		000e-)05	4.0000e- 005	0.0000	1.1458	1.1458	2.7000e- 004	0.0000	1.1525
	ROG		NOx	со	SO2	Fugi PN			VI10 otal	Fugitive PM2.5		aust PM2 12.5 Tot		CO2 NBio	-CO2 Total	CO2 CI	H4 I	120 CO20
Percent Reduction	0.00		0.00	0.00	0.00	0.	00 0	.00 0	.00	0.00	0	.00 0.0	0 0.	00 0.	00 0.	00 0.	00 0	.00 0.00

3.0 Construction Detail

Construction Phase

Phase Numbe	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	ő	Grading	1/2/2017	2/24/2017	5	40	
2		Building Construction	2/25/2017	6/16/2017	5	80	

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Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 40

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Grading	Graders	2	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Rough Terrain Forklifts	2	6.00	100	0.40
Building Construction	Tractors/Loaders/Backhoes	2	7.00	97	0.37
Building Construction	Trenchers	3	6.00	78	0.50
Building Construction	Welders	3	8.00	46	0.45
Building Construction	Cranes	0	7.00	231	0.29
Grading	Excavators	0	8.00	158	0.38
Building Construction	Forklifts	0	8.00	89	0.20
Grading	Scrapers	0	8.00	367	0.48

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Grading	5	20.00	10.00	0.00	13.00	20.00	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	11	70.00	5.00	40.00	13.00	20.00	130.00	LD_Mix	HDT_Mix	HHDT

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3.1 Mitigation Measures Construction

Water Unpaved Roads

Reduce Vehicle Speed on Unpaved Roads

Clean Paved Roads

3.2 Grading - 2017

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					ton	s/yr							MT	7/yr		
Fugitive Dust					0.1417	0.0000	0.1417	0.0685	0.0000	0.0685	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0587	0.6879	0.2667	5.6000e- 004		0.0320	0.0320		0.0294	0.0294	0.0000	52.1269	52.1269	0.0160	0.0000	52.5262
Total	0.0587	0.6879	0.2667	5.6000e- 004	0.1417	0.0320	0.1736	0.0685	0.0294	0.0979	0.0000	52.1269	52.1269	0.0160	0.0000	52.5262

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3.2 Grading - 2017

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					ton	s/yr							MT	/yr		
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	3.3800e- 003	0.0644	0.0195	1.3000e- 004	0.0950	1.0200e- 003	0.0961	0.0102	9.7000e- 004	0.0111	0.0000	12.8640	12.8640	5.8000e- 004	0.0000	12.8784
Worker	2.4500e- 003	2.3800e- 003	0.0207	4.0000e- 005	0.1867	3.0000e- 005	0.1867	0.0193	3.0000e- 005	0.0193	0.0000	3.5206	3.5206	1.6000e- 004	0.0000	3.5246
Total	5.8300e- 003	0.0668	0.0403	1.7000e- 004	0.2817	1.0500e- 003	0.2828	0.0294	1.0000e- 003	0.0304	0.0000	16.3845	16.3845	7.4000e- 004	0.0000	16.4030

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					ton	s/yr							MT	'/yr		
Fugitive Dust					0.1417	0.0000	0.1417	0.0685	0.0000	0.0685	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0587	0.6879	0.2667	5.6000e- 004		0.0320	0.0320		0.0294	0.0294	0.0000	52.1268	52.1268	0.0160	0.0000	52.5261
Total	0.0587	0.6879	0.2667	5.6000e- 004	0.1417	0.0320	0.1736	0.0685	0.0294	0.0979	0.0000	52.1268	52.1268	0.0160	0.0000	52.5261

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3.2 Grading - 2017

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					ton	s/yr							MT	/yr		
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	3.3800e- 003	0.0644	0.0195	1.3000e- 004	0.0950	1.0200e- 003	0.0961	0.0102	9.7000e- 004	0.0111	0.0000	12.8640	12.8640	5.8000e- 004	0.0000	12.8784
Worker	2.4500e- 003	2.3800e- 003	0.0207	4.0000e- 005	0.1867	3.0000e- 005	0.1867	0.0193	3.0000e- 005	0.0193	0.0000	3.5206	3.5206	1.6000e- 004	0.0000	3.5246
Total	5.8300e- 003	0.0668	0.0403	1.7000e- 004	0.2817	1.0500e- 003	0.2828	0.0294	1.0000e- 003	0.0304	0.0000	16.3845	16.3845	7.4000e- 004	0.0000	16.4030

3.3 Building Construction - 2017

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					ton	s/yr							MT	'/yr		
Off-Road	0.1637	1.1586	0.9341	1.3000e- 003		0.0835	0.0835	- 	0.0790	0.0790	0.0000	112.7654	112.7654	0.0274	0.0000	113.4510
Total	0.1637	1.1586	0.9341	1.3000e- 003		0.0835	0.0835		0.0790	0.0790	0.0000	112.7654	112.7654	0.0274	0.0000	113.4510

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3.3 Building Construction - 2017

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					ton	s/yr							MT	/yr		
Hauling	1.5300e- 003	0.0423	9.5700e- 003	1.0000e- 004	0.0114	4.8000e- 004	0.0118	1.5200e- 003	4.6000e- 004	1.9800e- 003	0.0000	9.3793	9.3793	4.2000e- 004	0.0000	9.3899
Vendor	3.3800e- 003	0.0644	0.0195	1.3000e- 004	0.0950	1.0200e- 003	0.0961	0.0102	9.7000e- 004	0.0111	0.0000	12.8640	12.8640	5.8000e- 004	0.0000	12.8784
Worker	0.0171	0.0167	0.1451	2.7000e- 004	1.3067	2.0000e- 004	1.3069	0.1349	1.8000e- 004	0.1351	0.0000	24.6440	24.6440	1.1400e- 003	0.0000	24.6724
Total	0.0220	0.1234	0.1742	5.0000e- 004	1.4131	1.7000e- 003	1.4148	0.1466	1.6100e- 003	0.1482	0.0000	46.8872	46.8872	2.1400e- 003	0.0000	46.9407

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					ton	s/yr							MT	/yr		
Off-Road	0.1637	1.1586	0.9341	1.3000e- 003		0.0835	0.0835		0.0790	0.0790	0.0000	112.7653	112.7653	0.0274	0.0000	113.4509
Total	0.1637	1.1586	0.9341	1.3000e- 003		0.0835	0.0835		0.0790	0.0790	0.0000	112.7653	112.7653	0.0274	0.0000	113.4509

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3.3 Building Construction - 2017

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					ton	s/yr							MT	/yr		
Hauling	1.5300e- 003	0.0423	9.5700e- 003	1.0000e- 004	0.0114	4.8000e- 004	0.0118	1.5200e- 003	4.6000e- 004	1.9800e- 003	0.0000	9.3793	9.3793	4.2000e- 004	0.0000	9.3899
Vendor	3.3800e- 003	0.0644	0.0195	1.3000e- 004	0.0950	1.0200e- 003	0.0961	0.0102	9.7000e- 004	0.0111	0.0000	12.8640	12.8640	5.8000e- 004	0.0000	12.8784
Worker	0.0171	0.0167	0.1451	2.7000e- 004	1.3067	2.0000e- 004	1.3069	0.1349	1.8000e- 004	0.1351	0.0000	24.6440	24.6440	1.1400e- 003	0.0000	24.6724
Total	0.0220	0.1234	0.1742	5.0000e- 004	1.4131	1.7000e- 003	1.4148	0.1466	1.6100e- 003	0.1482	0.0000	46.8872	46.8872	2.1400e- 003	0.0000	46.9407

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

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	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					ton	s/yr							MT	7/yr		
Mitigated	0.0107	5.2600e- 003	0.0535	1.0000e- 005	0.0000	4.0000e- 005	4.0000e- 005	0.0000	4.0000e- 005	4.0000e- 005	0.0000	1.1450	1.1450	2.7000e- 004	0.0000	1.1517
Unmitigated	0.0107	5.2600e- 003	0.0535	1.0000e- 005	0.0000	4.0000e- 005	4.0000e- 005	0.0000	4.0000e- 005	4.0000e- 005	0.0000	1.1450	1.1450	2.7000e- 004	0.0000	1.1517

4.2 Trip Summary Information

	Ave	rage Daily Trip Ra	ate	Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
User Defined Industrial	49.20	0.00	0.00		
Total	49.20	0.00	0.00		

4.3 Trip Type Information

		Miles			Trip %			Trip Purpos	e %
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
User Defined Industrial	13.00	5.00	5.00	100.00	0.00	0.00	0	0	0

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
User Defined Industrial	0.000000	0.000000	1.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000

5.0 Energy Detail

Historical Energy Use: N

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5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					ton	s/yr							MT	'/yr		
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Electricity Unmitigated	1 1 1 1 1	 		,	, 	0.0000	0.0000	1	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
NaturalGas Mitigated	0.0000	0.0000	0.0000	0.0000	, 	0.0000	0.0000)	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
NaturalGas Unmitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	 ! ! !	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

5.2 Energy by Land Use - NaturalGas

<u>Unmitigated</u>

	NaturalGa s Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr					ton	s/yr							MT	'/yr		
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

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5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGa s Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr					ton	s/yr							MT	/yr		
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

5.3 Energy by Land Use - Electricity

<u>Unmitigated</u>

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr		MT	/yr	
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000

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5.3 Energy by Land Use - Electricity <u>Mitigated</u>

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr		МТ	/yr	
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					ton	s/yr							MT	/yr		
Mitigated	4.0000e- 005	0.0000	4.2000e- 004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	8.1000e- 004	8.1000e- 004	0.0000	0.0000	8.6000e- 004
- J	4.0000e- 005	0.0000	4.2000e- 004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	8.1000e- 004	8.1000e- 004	0.0000	0.0000	8.6000e- 004

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6.2 Area by SubCategory

<u>Unmitigated</u>

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory					ton	s/yr							MT	/yr		
Architectural Coating	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
	4.0000e- 005	0.0000	4.2000e- 004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	8.1000e- 004	8.1000e- 004	0.0000	0.0000	8.6000e- 004
Total	4.0000e- 005	0.0000	4.2000e- 004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	8.1000e- 004	8.1000e- 004	0.0000	0.0000	8.6000e- 004

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory					ton	s/yr							МТ	7/yr		
Architectural Coating	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.0000	, 	,			0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	4.0000e- 005	0.0000	4.2000e- 004	0.0000	, , , , ,	0.0000	0.0000	 	0.0000	0.0000	0.0000	8.1000e- 004	8.1000e- 004	0.0000	0.0000	8.6000e- 004
Total	4.0000e- 005	0.0000	4.2000e- 004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	8.1000e- 004	8.1000e- 004	0.0000	0.0000	8.6000e- 004

7.0 Water Detail

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7.1 Mitigation Measures Water

	Total CO2	CH4	N2O	CO2e
Category		МТ	ī/yr	
Mitigated		0.0000	0.0000	0.0000
Innigatou		0.0000	0.0000	0.0000

7.2 Water by Land Use

<u>Unmitigated</u>

	Indoor/Out door Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal		MT	/yr	
User Defined Industrial	0/0	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000

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7.2 Water by Land Use

Mitigated

	Indoor/Out door Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal		МТ	/yr	
User Defined Industrial	0/0	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000

8.0 Waste Detail

8.1 Mitigation Measures Waste

Category/Year

	Total CO2	CH4	N2O	CO2e
		МТ	/yr	
initigated	0.0000	0.0000	0.0000	0.0000
l	0.0000	0.0000	0.0000	0.0000

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8.2 Waste by Land Use

<u>Unmitigated</u>

	Waste Disposed	Total CO2	CH4	N2O	CO2e				
Land Use	tons	MT/yr							
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000				
Total		0.0000	0.0000	0.0000	0.0000				

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e				
Land Use	tons	MT/yr							
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000				
Total		0.0000	0.0000	0.0000	0.0000				

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

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10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
<u>Boilers</u>						
Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type	
Jser Defined Equipment						
Equipment Type	Number					

Paso Robles Solar - San Luis Obispo County, Winter

Paso Robles Solar

San Luis Obispo County, Winter

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
User Defined Industrial	24.60	User Defined Unit	24.60	0.00	0

1.2 Other Project Characteristics

Urbanization	Urban Wind Speed (m/s)		3.2	Precipitation Freq (Days)	44
Climate Zone	4			Operational Year	2019
Utility Company	Pacific Gas & Electric Co	mpany			
CO2 Intensity (Ib/MWhr)	641.35	CH4 Intensity (Ib/MWhr)	0.029	N2O Intensity (Ib/MWhr)	0.006

1.3 User Entered Comments & Non-Default Data

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Paso Robles Solar - San Luis Obispo County, Winter

Project Characteristics -

Land Use - site size

Construction Phase - 40 days grading, 80 days construction

Off-road Equipment -

Off-road Equipment - Construction: 1 gen set, 2 loaders/backhoes, 3 welders, 3 trenchers, 2 rough terrain forklifts

Off-road Equipment - Grading: 2 graders, 1 dozer, 2 loader/backhoes

Trips and VMT - 20 worker trips grading, 70 trips construction, 40 haul trips at 130 miles round trips (within air basin)

On-road Fugitive Dust - SLO Region Valies per CALEEMOD user guide .25 mile unpaved roads

Grading -

Vehicle Trips - 2 trips per week modeled as 1 per day max

Road Dust - reflects .25 miles unpaved road and CARBs 2.0 (Ib PMT/VMT) and 0.2 (Ib PM2.5/VMT)

Construction Off-road Equipment Mitigation -

Fleet Mix - Pickup trucks LDT2

Table Name	Column Name	Default Value	New Value
tblConstDustMitigation	WaterUnpavedRoadMoistureContent	0	0.1
tblConstDustMitigation	WaterUnpavedRoadVehicleSpeed	40	32.4
tblConstructionPhase	NumDays	370.00	80.00
tblConstructionPhase	NumDays	35.00	40.00
tblFleetMix	HHD	0.02	0.00
tblFleetMix	LDA	0.55	0.00
tblFleetMix	LDT1	0.03	0.00
tblFleetMix	LDT2	0.20	1.00
tblFleetMix	LHD1	0.03	0.00
tblFleetMix	LHD2	7.8720e-003	0.00
tblFleetMix	МСҮ	5.6300e-003	0.00
tblFleetMix	MDV	0.13	0.00

Paso Robles Solar - San Luis Obispo County, Winter

tblFleetMix	MH	1.8520e-003	0.00
tblFleetMix	MHD	0.01	0.00
tblFleetMix	OBUS	2.4040e-003	0.00
tblFleetMix	SBUS	8.2500e-004	0.00
tblFleetMix	UBUS	1.3200e-003	0.00
tblLandUse	LotAcreage	0.00	24.60
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	3.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	0.00
tblOnRoadDust	HaulingPercentPave	100.00	99.80
tblOnRoadDust	HaulingPercentPave	100.00	99.80
tblOnRoadDust	MaterialMoistureContent	0.50	0.10
tblOnRoadDust	MaterialMoistureContent	0.50	0.10
tblOnRoadDust	MaterialSiltContent	8.50	9.30
tblOnRoadDust	MaterialSiltContent	8.50	9.30
tblOnRoadDust	MeanVehicleSpeed	40.00	32.40
tblOnRoadDust	MeanVehicleSpeed	40.00	32.40
tblOnRoadDust	VendorPercentPave	100.00	98.70
tblOnRoadDust	VendorPercentPave	100.00	98.70
tblOnRoadDust	WorkerPercentPave	100.00	98.00
tblOnRoadDust	WorkerPercentPave	100.00	98.00
tblProjectCharacteristics	OperationalYear	2018	2019
tblRoadDust	RoadPercentPave	100	98

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tblTripsAndVMT	HaulingTripLength	20.00	130.00
tblTripsAndVMT	HaulingTripNumber	0.00	40.00
tblTripsAndVMT	VendorTripLength	5.00	20.00
tblTripsAndVMT	VendorTripLength	5.00	20.00
tblTripsAndVMT	VendorTripNumber	0.00	10.00
tblTripsAndVMT	VendorTripNumber	0.00	5.00
tblTripsAndVMT	WorkerTripNumber	13.00	20.00
tblTripsAndVMT	WorkerTripNumber	0.00	70.00
tblVehicleTrips	CW_TTP	0.00	100.00
tblVehicleTrips	WD_TR	0.00	2.00

2.0 Emissions Summary

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Paso Robles Solar - San Luis Obispo County, Winter

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	со	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/c	lay				
2017	4.6913	37.7048	27.7584	0.0450	40.0808	2.1287	42.2095	5.0863	2.0145	6.6079	0.0000	4,392.188 7	4,392.188 7	0.9215	0.0000	4,412.561 2
Maximum	4.6913	37.7048	27.7584	0.0450	40.0808	2.1287	42.2095	5.0863	2.0145	6.6079	0.0000	4,392.188 7	4,392.188 7	0.9215	0.0000	4,412.561 2

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/c	lay				
2017	4.6913	37.7048	27.7584	0.0450	40.0808	2.1287	42.2095	5.0863	2.0145	6.6079	0.0000	4,392.188 7	4,392.188 7	0.9215	0.0000	4,412.561 2
Maximum	4.6913	37.7048	27.7584	0.0450	40.0808	2.1287	42.2095	5.0863	2.0145	6.6079	0.0000	4,392.188 7	4,392.188 7	0.9215	0.0000	4,412.561 2

	ROG	NOx	со	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Paso Robles Solar - San Luis Obispo County, Winter

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					lb/	day							lb/c	lay		
Area	2.4000e- 004	2.0000e- 005	2.5400e- 003	0.0000		1.0000e- 005	1.0000e- 005		1.0000e- 005	1.0000e- 005		5.3800e- 003	5.3800e- 003	1.0000e- 005		5.7500e- 003
Energy	0.0000	0.0000	0.0000	0.0000	 	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0862	0.0423	0.4454	1.1000e- 004	0.0000	3.0000e- 004	3.0000e- 004	0.0000	2.8000e- 004	2.8000e- 004		9.7202	9.7202	2.4000e- 003		9.7803
Total	0.0864	0.0424	0.4480	1.1000e- 004	0.0000	3.1000e- 004	3.1000e- 004	0.0000	2.9000e- 004	2.9000e- 004		9.7256	9.7256	2.4100e- 003	0.0000	9.7861

Mitigated Operational

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					lb/	day						lb/d	lay			
Area	2.4000e- 004	2.0000e- 005	2.5400e- 003	0.0000		1.0000e- 005	1.0000e- 005		1.0000e- 005	1.0000e- 005		5.3800e- 003	5.3800e- 003	1.0000e- 005		5.7500e- 003
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0862	0.0423	0.4454	1.1000e- 004	0.0000	3.0000e- 004	3.0000e- 004	0.0000	2.8000e- 004	2.8000e- 004		9.7202	9.7202	2.4000e- 003		9.7803
Total	0.0864	0.0424	0.4480	1.1000e- 004	0.0000	3.1000e- 004	3.1000e- 004	0.0000	2.9000e- 004	2.9000e- 004		9.7256	9.7256	2.4100e- 003	0.0000	9.7861

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Paso Robles Solar - San Luis Obispo County, Winter

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Numb		Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Grading	Grading	1/2/2017	2/24/2017	5	40	
2	Building Construction	Building Construction	2/25/2017	6/16/2017	5	80	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 40

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Paso Robles Solar - San Luis Obispo County, Winter	

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Grading	Graders	2	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Rough Terrain Forklifts	2	6.00	100	0.40
Building Construction	Tractors/Loaders/Backhoes	2	7.00	97	0.37
Building Construction	Trenchers	3	6.00	78	0.50
Building Construction	Welders	3	8.00	46	0.45
Building Construction	Cranes	0	7.00	231	0.29
Grading	Excavators	0	8.00	158	0.38
Building Construction	Forklifts	0	8.00	89	0.20
Grading	Scrapers	0	8.00	367	0.48

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length		Vendor Vehicle Class	Hauling Vehicle Class
Grading	5	20.00	10.00	0.00	13.00	20.00	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	11	70.00	5.00	40.00	13.00	20.00	130.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Water Unpaved Roads

Reduce Vehicle Speed on Unpaved Roads

Clean Paved Roads

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Paso Robles Solar - San Luis Obispo County, Winter

3.2 Grading - 2017

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					lb/d	day							lb/c	lay		
Fugitive Dust					7.0826	0.0000	7.0826	3.4247	0.0000	3.4247			0.0000			0.0000
Off-Road	2.9360	34.3962	13.3333	0.0281		1.5994	1.5994		1.4714	1.4714		2,873.003 6	2,873.003 6	0.8803		2,895.010 7
Total	2.9360	34.3962	13.3333	0.0281	7.0826	1.5994	8.6820	3.4247	1.4714	4.8962		2,873.003 6	2,873.003 6	0.8803		2,895.010 7

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					lb/e	day							lb/d	day		
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.1717	3.1874	0.9991	6.6600e- 003	5.3821	0.0510	5.4332	0.5718	0.0488	0.6206		705.6169	705.6169	0.0322		706.4229
Worker	0.1356	0.1213	1.0473	1.9400e- 003	10.5924	1.4200e- 003	10.5938	1.0898	1.3200e- 003	1.0911		192.4768	192.4768	8.9700e- 003		192.7010
Total	0.3073	3.3086	2.0464	8.6000e- 003	15.9745	0.0525	16.0270	1.6616	0.0502	1.7117		898.0937	898.0937	0.0412		899.1239

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Paso Robles Solar - San Luis Obispo County, Winter

3.2 Grading - 2017

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					lb/e	day							lb/d	lay		
Fugitive Dust					7.0826	0.0000	7.0826	3.4247	0.0000	3.4247			0.0000			0.0000
Off-Road	2.9360	34.3962	13.3333	0.0281		1.5994	1.5994		1.4714	1.4714	0.0000	2,873.003 6	2,873.003 6	0.8803		2,895.010 7
Total	2.9360	34.3962	13.3333	0.0281	7.0826	1.5994	8.6820	3.4247	1.4714	4.8962	0.0000	2,873.003 6	2,873.003 6	0.8803		2,895.010 7

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category			-		lb/d	day							lb/d	day		
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.1717	3.1874	0.9991	6.6600e- 003	5.3821	0.0510	5.4332	0.5718	0.0488	0.6206		705.6169	705.6169	0.0322		706.4229
Worker	0.1356	0.1213	1.0473	1.9400e- 003	10.5924	1.4200e- 003	10.5938	1.0898	1.3200e- 003	1.0911		192.4768	192.4768	8.9700e- 003		192.7010
Total	0.3073	3.3086	2.0464	8.6000e- 003	15.9745	0.0525	16.0270	1.6616	0.0502	1.7117		898.0937	898.0937	0.0412		899.1239

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3.3 Building Construction - 2017

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category			-		lb/e	day		-					lb/c	lay		
Off-Road	4.0925	28.9661	23.3532	0.0324		2.0862	2.0862		1.9740	1.9740		3,107.565 5	3,107.565 5	0.7557		3,126.457 7
Total	4.0925	28.9661	23.3532	0.0324		2.0862	2.0862		1.9740	1.9740		3,107.565 5	3,107.565 5	0.7557		3,126.457 7

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category			-		lb/e	day							lb/c	lay		
Hauling	0.0384	1.0486	0.2403	2.4100e- 003	0.3165	0.0120	0.3284	0.0414	0.0114	0.0529		258.1460	258.1460	0.0117		258.4387
Vendor	0.0858	1.5937	0.4996	3.3300e- 003	2.6911	0.0255	2.7166	0.2859	0.0244	0.3103		352.8085	352.8085	0.0161		353.2115
Worker	0.4746	0.4244	3.6654	6.7900e- 003	37.0733	4.9800e- 003	37.0783	3.8142	4.6100e- 003	3.8188		673.6687	673.6687	0.0314		674.4533
Total	0.5988	3.0667	4.4052	0.0125	40.0808	0.0425	40.1233	4.1415	0.0405	4.1820		1,284.623 2	1,284.623 2	0.0592		1,286.103 5

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3.3 Building Construction - 2017

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					lb/e	day							lb/c	lay		
Off-Road	4.0925	28.9661	23.3532	0.0324		2.0862	2.0862		1.9740	1.9740	0.0000	3,107.565 5	3,107.565 5	0.7557		3,126.457 7
Total	4.0925	28.9661	23.3532	0.0324		2.0862	2.0862		1.9740	1.9740	0.0000	3,107.565 5	3,107.565 5	0.7557		3,126.457 7

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category			-		lb/	day						-	lb/c	lay		
Hauling	0.0384	1.0486	0.2403	2.4100e- 003	0.3165	0.0120	0.3284	0.0414	0.0114	0.0529		258.1460	258.1460	0.0117		258.4387
Vendor	0.0858	1.5937	0.4996	3.3300e- 003	2.6911	0.0255	2.7166	0.2859	0.0244	0.3103		352.8085	352.8085	0.0161		353.2115
Worker	0.4746	0.4244	3.6654	6.7900e- 003	37.0733	4.9800e- 003	37.0783	3.8142	4.6100e- 003	3.8188		673.6687	673.6687	0.0314		674.4533
Total	0.5988	3.0667	4.4052	0.0125	40.0808	0.0425	40.1233	4.1415	0.0405	4.1820		1,284.623 2	1,284.623 2	0.0592		1,286.103 5

4.0 Operational Detail - Mobile

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Paso Robles Solar - San Luis Obispo County, Winter

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					lb/	day							lb/d	lay		
Mitigated	0.0862	0.0423	0.4454	1.1000e- 004	0.0000	3.0000e- 004	3.0000e- 004	0.0000	2.8000e- 004	2.8000e- 004		9.7202	9.7202	2.4000e- 003		9.7803
Unmitigated	0.0862	0.0423	0.4454	1.1000e- 004	0.0000	3.0000e- 004	3.0000e- 004	0.0000	2.8000e- 004	2.8000e- 004		9.7202	9.7202	2.4000e- 003		9.7803

4.2 Trip Summary Information

	Ave	rage Daily Trip Ra	ate	Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
User Defined Industrial	49.20	0.00	0.00		
Total	49.20	0.00	0.00		

4.3 Trip Type Information

		Miles			Trip %			Trip Purpos	e %
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
User Defined Industrial	13.00	5.00	5.00	100.00	0.00	0.00	0	0	0

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
User Defined Industrial	0.000000	0.000000	1.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000

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Paso Robles Solar - San Luis Obispo County, Winter

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					lb/o	day							lb/c	lay		
NaturalGas Mitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
NaturalGas Unmitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

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5.2 Energy by Land Use - NaturalGas

<u>Unmitigated</u>

	NaturalGa s Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr					lb/o	day							lb/d	lay		
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

Mitigated

	NaturalGa s Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr					lb/d	day							lb/d	lay		
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

6.0 Area Detail

6.1 Mitigation Measures Area

Paso Robles Solar - San Luis Obispo County, Winter

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					lb/o	day							lb/d	lay		
Mitigated	2.4000e- 004	2.0000e- 005	2.5400e- 003	0.0000		1.0000e- 005	1.0000e- 005		1.0000e- 005	1.0000e- 005		5.3800e- 003	5.3800e- 003	1.0000e- 005		5.7500e- 003
Unmitigated	2.4000e- 004	2.0000e- 005	2.5400e- 003	0.0000		1.0000e- 005	1.0000e- 005	 	1.0000e- 005	1.0000e- 005		5.3800e- 003	5.3800e- 003	1.0000e- 005		5.7500e- 003

6.2 Area by SubCategory

<u>Unmitigated</u>

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day								lb/day							
Architectural Coating	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	0.0000		,		, 	0.0000	0.0000	 	0.0000	0.0000		· · · · · · · · · · · · · · · · · · ·	0.0000			0.0000
Landscaping	2.4000e- 004	2.0000e- 005	2.5400e- 003	0.0000	, , , , ,	1.0000e- 005	1.0000e- 005	 	1.0000e- 005	1.0000e- 005		5.3800e- 003	5.3800e- 003	1.0000e- 005		5.7500e- 003
Total	2.4000e- 004	2.0000e- 005	2.5400e- 003	0.0000		1.0000e- 005	1.0000e- 005		1.0000e- 005	1.0000e- 005		5.3800e- 003	5.3800e- 003	1.0000e- 005		5.7500e- 003

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Paso Robles Solar - San Luis Obispo County, Winter

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day								lb/day							
Architectural Coating	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	0.0000	,				0.0000	0.0000	 	0.0000	0.0000			0.0000	 	, ,	0.0000
Landscaping	2.4000e- 004	2.0000e- 005	2.5400e- 003	0.0000	 	1.0000e- 005	1.0000e- 005	 	1.0000e- 005	1.0000e- 005		5.3800e- 003	5.3800e- 003	1.0000e- 005		5.7500e- 003
Total	2.4000e- 004	2.0000e- 005	2.5400e- 003	0.0000		1.0000e- 005	1.0000e- 005		1.0000e- 005	1.0000e- 005		5.3800e- 003	5.3800e- 003	1.0000e- 005		5.7500e- 003

7.0 Water Detail

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
11 51		,	,			51

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

CalEEMod Version: CalEEMod.2016.3.1

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Paso Robles Solar - San Luis Obispo County, Winter

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type		
Boilers								
Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type			
User Defined Equipment								
Equipment Type	Number							
11.0 Vegetation								



BIOLOGICAL RESOURCES ASSESSMENT Paso Robles Municipal Airport Solar Project APN: 025-450-001 Airport Road, Paso Robles, California

Prepared for: EPD Solutions, Inc. 2030 Main Street, Suite 1200 Irvine, California 92614



Prepared by: Terra Verde Environmental Consulting, LLC 3765 South Higuera Street, Suite 102 San Luis Obispo, California 93401

January 2017



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EXECUTIVE SUMMARY

This Biological Resources Assessment was prepared by Terra Verde Environmental Consulting, LLC (Terra Verde) on behalf of EPD Solutions, Inc. for a proposed 24.6-acre solar project to be located near the Paso Robles Municipal Airport (Airport) in the City of Paso Robles, California (APN 025-450-001). The project involves constructing two blocks of single-axis tracking solar ground units, inverter pads, a perimeter fence, and interior access roads on an undeveloped portion of the Airport parcel. Construction is also anticipated to include installation and upgrades to existing electric distribution lines, installation of basic utilities (e.g., gas and water), and the development of permanent entry/egress points.

Terra Verde Principal Biologist Brian Dugas and staff conducted a field survey of the proposed project site and surrounding areas on October 28, 2016. The survey area included the proposed development, an approximate 500-foot buffer, and a scan of the surrounding areas. The survey included a comprehensive botanical and wildlife inventory, a preliminary jurisdictional analysis of aquatic resources identified on site, and an analysis of habitat, focusing on the potential for special-status species to occur.

The project site is largely unvegetated as a result of historic and ongoing discing. No specialspecies status plant or wildlife species were observed. Several mature valley oak (*Quercus lobata*) trees occur on site and are expected to be avoided. Seven additional special-status plants may occur but were not identified during the survey. A search of the CNDDB and other resource agency materials revealed that U.S. Fish and Wildlife Service (USFWS)-designated Critical Habitat for vernal pool fairy shrimp (VPFS; *Brachinecta lynchi*) is present; however, no Primary Constituent Elements for VPFS are present and this species is not expected to occur. Additionally, the project is situated within the County of San Luis Obispo-designated San Joaquin kit fox (*Vulpes macrotis mutica*; SJKF) 3:1 mitigation area. SJKF is not expected to occur on site due to lack of habitat and connectivity to known populations. Due to the presence of one blue line drainage that contained water during the survey, there is a low to moderate potential for western spadefoot toad (*Spea hammondii*) and western pond turtle (*Actinemys marmorata*) to occur. Impacts to the blue line drainage would fall under the jurisdiction of state and federal agencies; however, no impacts to this hydrological feature or a separate upland swale are proposed. Nesting birds may also occur on site, and one golden eagle nest has been documented within 2 miles (CNDDB, 2006).

As currently designed, the potential for impacts to biological resources is considered low. Species that may occur include western spadefoot toad, western pond turtle, and San Joaquin kit fox. Direct impacts could result from construction-related disturbances such as trampling or crushing from equipment and potential long-term impacts include the loss of habitat through permanent conversion of open land to developed areas. A series of mitigation measures have been recommended to reduce potential impacts to a less than significant level.



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Paso Robles Airport Solar Project Biological Resources Assessment City of Paso Robles, California



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Appendix A -

Figure 1: Project Vicinity Map

- Figure 2: Survey Area Map
- Figure 3: 2-mile CNDDB and Critical Habitat Map
- Figure 4: Soils Map
- Figure 5: Vegetation Community and Sensitive Resource Map
- Appendix B Project Site Plans
- Appendix C Botanical and Wildlife Species Observed

Appendix D – Regionally Occurring Special-Status Species

Appendix E – Representative Site Photographs



1.0 INTRODUCTION

This Biological Resources Assessment (BRA) was prepared by Terra Verde Environmental Consulting, LLC (Terra Verde) at the request of EPD Solutions, LLC (owner) for a proposed solar facility (project) to be located northwest of the Paso Robles Municipal Airport (Airport) in the City of Paso Robles (City), California (APN 025-450-001) (see Appendix A - Figure 1: Project Vicinity Map). Specifically, the owner is proposing to construct an approximately 24.6-acre facility (project area), arranged in two rectangular blocks of single-axis tracking solar ground units, inverter pads, a perimeter fence, and interior access roads. Additional project activities include installing and/or upgrading existing electric distribution lines, installing basic utilities (e.g., gas and water), and developing permanent entry/egress points.

Preliminary construction drawings have been developed (see Appendix B - Project Site Plans), which situate the facility approximately 450 feet east of Airport Road just south of Adobe Road, and north of the main Airport facilities. This area consists primarily of undeveloped lands surrounded by rural developments (e.g., Airport, Cal Fire outbuildings, etc.) and dense agriculture (i.e., vineyards). Highway 46 is located approximately 2 miles to the south and Highway 101 is approximately 4 miles to the west. The parcel falls within the Paso Robles Urban Reserve Line and the Airport Review Area; surrounding land uses consist of Rural and Suburban Residential and Agriculture zoning. This parcel is also located within the San Luis Obispo County- (County) designated San Joaquin kit fox (SJKF; *Vulpes macrotis mutica*) mitigation area.

1.1 Purpose of the Biological Resources Assessment

The purpose of this BRA is to identify sensitive environmental and biological resources that occur or have potential to occur within the proposed project area and the surrounding spaces. For this report, a sensitive resource is defined as one that is of management concern to the County and/or state and federal resource agencies. Recommended avoidance and minimization measures have been provided in section 4.2 which are intended to reduce any potential impacts to sensitive biological resources to the extent feasible. As necessary, this BRA may be utilized to support the environmental review process and future project permitting.

1.2 Existing Conditions

The project parcel is located within the Paso Robles USGS 7.5-minute topographic quadrangle, within City limits. It is situated at the eastern edge of the Santa Lucia Mountain Range within the Upper Salinas Watershed and the Upper Salinas River Valley, approximately 3 miles east of the Salinas River. One U.S. Geological Survey (USGS) blue line stream occurs on the project parcel, just west of the proposed placement of the solar facility (see Appendix B). Topography is mostly flat with shallow undulations and elevations ranging from approximately 775 feet (ft) to 800 ft above sea level. Vegetation is generally ruderal in nature, with large areas of bare ground, likely due to regular discing. A review of historic aerial imagery indicates that discing or



other vegetation management activities have been ongoing at this site since at least 1994 (Google Earth, 1994-2015). Several mature oak trees are present on the parcel, which are mostly concentrated along the unnamed drainage feature; two isolated individuals are present in upland areas. The existing primary access to the project area is a gravel road spurring from Airport Road, south of its intersection with Adobe Road. It is likely that this road presently serves as secondary access to the Cal Fire facility and Airport.

2.0 METHODOLOGY

Terra Verde Principal Biologist Brian Dugas, biologist Halden Petersen, and botanist Kristen Nelson surveyed the project area on the afternoon of October 28, 2016. During the 24 hours preceding the survey, a rain event totaling 1.01 inches of precipitation was recorded at the Airport (Lindsey 2016). The survey area included the limits of project disturbance (i.e., the solar facility and associated structures) and an approximate 500-foot buffer on all sides. Additionally, a visual scan occurred of areas beyond 500 feet (see Appendix A - Figure 2: Survey Area Map). Visibility was suitable to detect potentially occurring wildlife species.

The survey was pedestrian in nature and lasted approximately three hours. The surveyors walked meandering transects to maximize the detectability of plants and wildlife and the amount of visual ground coverage. All detected plant and wildlife species and their sign were documented (see Appendix C- Botanical and Wildlife Species Observed). Botanical species identifications and taxonomic nomenclature followed *The Jepson Manual: Vascular Plants of California*, 2nd edition (Baldwin et al. 2012). Vegetation communities were characterized, and a preliminary jurisdictional analysis was conducted to describe the blue line drainage and identify any other potential jurisdictional water features (i.e., drainages, wetlands, etc.) present on site.

Prior to conducting the field surveys, Terra Verde staff reviewed the following resources:

- Aerial photographs and site plans;
- U.S. Geological Survey Paso Robles 7.5-minute topographic quadrangle;
- Online Soil Survey of San Luis Obispo County, California; Natural Resources Conservation Service (NRCS 2016);
- Consortium of California Herbaria (CCH) online database of plant collections (CCH2016);
- A California Natural Diversity Database (CNDDB) list of state and federally listed specialstatus species with potential to occur within the Paso Robles 7.5-minute quadrangle and the surrounding eight quadrangles (Bradley, San Miguel, Ranchito Canyon, Adelaida, Estrella, York Mountain, Templeton, and Creston), (California Department of Fish and Wildlife [CDFW] 2016);
- A CNDDB map of state and federally listed special-status species that have been documented within a 2-mile radius of the project site (CDFW 2016) (see Appendix A Figure 3: 2-mile CNDDB and Critical Habitat Map);



- California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants for the Atascadero 7.5-minute quadrangle and the surrounding eight quadrangles (Creston, Lopez Mountain, Morro Bay North, Morro Bay South, San Luis Obispo, Templeton, and York Mountain), (CNPS 2016);
- United States Fish and Wildlife Service (USFWS) Critical Habitat Portal (USFWS 2016); and,
- USFWS National Wetland Inventory (NWI) (USFWS 2016).

A list of regionally-occurring special-status species reported in the scientific database queries was compiled (see Appendix D - Regionally Occurring Special-Status Species). The survey area was assessed for suitability of habitat to support each species and their habitat requirements were compared to the types and quality of those observed on site. The potential for many species to occur was eliminated due to lack of suitable habitat and elevation, lack of appropriate soils/substrate, and/or known distribution of the species. Special-status species determined to have potential to occur are discussed in-depth below and those determined to have no potential to occur are not discussed further.

2.1 Sufficiency of Biological Data

The field survey and desktop research are of sufficient detail and biological expertise to identify potentially occurring special-status wildlife species. However, the survey did not take place during the typical blooming period (i.e., March - June) for potentially occurring special-status plants. As such, predictions were made as to the potential for their occurrence, based on existing site conditions.

3.0 RESULTS

This section provides a summary and analysis of the results of the background research and field survey. The discussion includes soils, terrestrial and aquatic habitat types identified, direct and indirect observations of wildlife and plants, and a discussion of the potential for special-status species to occur. Any anticipated impacts to existing wildlife corridors and habitat connectivity are also considered.

3.1 Habitats and Resources Observed

Overall, the survey area displays very little variation in habitat. Three soil types and two natural vegetation communities were documented. Bare soils and sparse grasses dominate the project area, coinciding with the remainder of the Airport parcel which generally has limited vegetation. Those areas with extant grasses and shrubs have only sparse coverage and those areas also show obvious signs of land manipulation (e.g., tractor disc lines and the presence of agricultural plants such as common barley [*Hordeum vulgare*]). Although numerous plants and wildlife are able to persist in disturbed conditions, this site is exceedingly void of forage and



cover. It is expected that historic and current land management practices have greatly impacted the potential for sensitive environmental and biological resources to occur on site.

3.1.1 Soils

The NRCS online soil report revealed three soil units within the survey area: Arbuckle-Positas complex (unit 102), Arbuckle-San Ysidro complex (unit 106), and Cropley clay (unit 133) (see Appendix A - Figure 4: Soils Map). Present construction drawings position the project over two of the soils, unit 102 and unit 106.

Soil Unit 102: Arbuckle-Positas complex, 9-15 percent slopes

The parent material of this soil type is alluvium from mixed rock sources. The drainage class of this unit is well drained, and it is composed mostly of fine sandy and clay loams over gravelly, sandy clay loams. This soil type tends to occur on toeslopes and terraces below 1,500 feet.

Soil Unit 106: Arbuckle-San Ysidro complex, 2 to 9 percent slopes

This soil type is nearly identical to soil unit 102, but it generally occurs on shallower slopes.

Soil Unit 133: Cropley clay, 2 to 9 percent slopes

The parent material of this soil type is alluvium derived from calcareous shale. The drainage class of this unit is moderately well drained and it is composed mostly of clay over sandy clay loam. This soil type tends to occur on backslopes, alluvial fans, and terraces.

3.1.2 Vegetation Communities

Vegetation communities were classified using the second edition of *A Manual of California Vegetation* (MCV) classification system (Sawyer et al. 2009). A total of 42 vascular plant species were identified, of which 25 (57 percent) were non-native. The number and abundance of non-native taxa substantially exceeds that of native taxa, and many of the native species documented are disturbance tolerant (e.g., telegraph weed [*Heterotheca grandiflora*], vinegar weed [*Trichostema lanceolatum*], turkey-mullein [*Croton setiger*], Jimson weed [*Datura wrightii*], etc.), reflecting the high level of disturbance on site.

Of the 95.5 acres surveyed, approximately one half was denuded of vegetation. The remaining acreage supports one active vineyard and two natural vegetation communities: annual brome grassland and a small cattail marsh. The onsite drainage channel and associated vegetation is a very narrow corridor, ranging from approximately 3 to 15 feet wide, and supports patchy native vegetation (see appendix A - Figure 5: Vegetation Communities Map). These vegetation communities and land cover types are described in detail below.



Annual Brome Grassland (35.40 acres)

This community occurs in portions of the survey area that have not recently been disced, and overlaps a majority of the proposed project site and an isolated patch of vegetation south of the gravel access road, which is not proposed for development. This community is dominated by annual species which were mostly senesced at the time of the survey. However, ripgut grass (*Bromus diandrus*) appeared to be dominant in these areas, with other annual grasses occurring commonly, including slender wild oats (*Avena barbata*), red brome (*Bromus madritensis* subsp. *rubens*), and agricultural barley. Forbs documented in this community include sticky mouse-ear chickweed (*Cerastium glomeratum*), Russian thistle (*Salsola tragus*), and tarplant (*Deinandra* sp.). There is evidence of historic discing in the portion of this community that overlaps the project area (north of the gravel access road), but the current level of vegetative growth indicates that is has not been disced for at least one growing season.

This species composition was used in determining the community classification, which most closely corresponds with the *Bromus* (*diandrus*, *hordeaceus*) Semi Natural Herbaceous Stands, annual brome grasslands, in the MCV classification system. Typically, annual brome grasslands occur in foothills, waste places, rangelands, and openings in woodlands at elevations below 2,200 m. This community may provide habitat for nesting birds, small mammals, and other wildlife, but the density of growth in the survey area is very low and the potential for future anthropogenic disturbances to occur is high.

Cattail Marsh (0.05 acre)

This community occurs in an isolated patch at the southeast corner of the survey area. It is dominated by cattails (*Typha* sp.), with a mature arroyo willow (*Salix lasiolepis*) and a few black cottonwood (*Populus trichocarpa*) saplings providing limited canopy cover. The margins of this community are inundated by non-native, annual species including yellow star-thistle (*Centaurea solstitialis*), ripgut grass, and bindweed (*Convolvulus arvensis*). This community is outside the proposed project area, and is not expected to be impacted as a result of proposed project activities.

This species composition was used in determining the community classification, which most closely corresponds with the *Typha (angustifolia, domingensis, latifolia)* Herbaceous Alliance, cattail marshes, in the MCV classification system. This community may provide habitat for nesting birds, small mammals, and other wildlife including aquatic and semi-aquatic species.

Ruderal/Anthropogenic (56.41 acres)

Areas supporting minimal or weedy vegetation and are characterized by regular or ongoing disturbances were identified in large portions of the survey area. The margins of the disced fields and the undeveloped portions of the cemetery in the northwest corner of the survey area support an assemblage of weedy species such as ripgut grass, telegraph weed, vinegar



weed, turkey mullein, bindweed, and flax-leaved horseweed (*Erigeron bonariensis*). In addition, several ornamental pine trees (*Pinus* spp.) and a manmade structure are present. This species composition does not correspond to a natural vegetation community, but may provide marginally suitable habitat for wildlife foraging and cover.

Active Agriculture (1.94 acres)

A small portion of the survey area, north of the cemetery, is an active vineyard. This area is characterized by a high level of anthropogenic disturbance, and is not classified as a natural vegetation community or land cover. Further, this area does not fall within the proposed project footprint.

Ephemeral Drainage (2.08 acres)

As noted above, an ephemeral blue line drainage flows roughly northwest across the survey area. Flowing water, generally less than 4 inches deep, was noted within the channel at the time of the survey, which was likely due to runoff from a recent significant rain event. In most areas, the banks of the drainage are vegetated with weedy, annual species that match the composition of the annual brome grasslands documented in surrounding areas. However, several saplings and mature individuals of valley oak (*Quercus lobata*), several mature black cottonwood trees, and a patch of coyote brush (*Baccharis pilularis*) occur within and along the banks of the channel. The presence of these upland species within the channel bottom reflects its ephemeral nature. The sparse cover of native vegetation within the channel does not correspond to a natural vegetation community, but may provide suitable nesting and/or foraging habitat for wildlife.

3.1.3 Wildlife

Habitat for wildlife within and around the project area is generally homogeneous and highly modified from its natural state. Vegetative and underground cover are lacking, and it is expected that wildlife entering the survey area would be transient, using the area for foraging rather than regular occupancy. However, the due to the lack of quality forage (e.g., grasses, forbs, and small mammal prey, etc.), the habitat quality is considered poor for most species and wildlife use is expected to be minimal.

During the survey, all invertebrate and vertebrate species observed, including those detected by indirect sign (i.e., tracks, scat, skeletal remains, dens, burrows, or vocalizations) were documented. Wildlife observed included several avian species, coyote (*Canis latrans*), California ground squirrel (*Otospermophilus beecheyi*), grasshopper (order Orthoptera), and western fence lizard (*Sceloporus occidentalis*). Common wildlife such as black-tailed deer (*Odocoileus hemionus columbianus*), bobcat (*Lynx rufus*), Botta's pocket gopher (*Thomomys bottae*), and additional bird species can be expected to occur throughout the year and/or seasonally.



The unnamed drainage was flowing northwest through the site. Although the drainage is likely ephemeral, this feature provides a periodic water source for wildlife, including the possibility of aquatic breeding habitat for amphibians. Due to limited flows, fish are not likely to be present.

3.1.4 Hydrologic Features

As previously discussed, one drainage feature was identified within the survey area, west of the proposed development site. The feature is unnamed in the USGS topographic maps, but was maintaining low flows at the time of the survey and likely has connectivity downstream with the Salinas River and the Pacific Ocean.

A second feature was detected in aerial imagery of the site, east of the proposed development. The feature appears saturated and supporting denser vegetation compared to adjacent, upland vegetation when viewed in recent and historic aerial images. However, this feature exhibits only gentle topographical changes with no evidence of recent or sustained flow (e.g., no scour marks, ponding, ordinary high water marks, debris racking, or hydrophytic vegetation, etc.). It may have historically conveyed flow but, at present, this upland swale feature is heavily disturbed and regularly disced.

3.2 Sensitive Resources

The results of the desktop research of the area surrounding the proposed project site indicated that 1 sensitive natural community and 76 sensitive species, including 58 plant and 28 wildlife species, could occur. A review of the habitat requirements for each of these species in comparison with site conditions narrowed the list to 7 sensitive plants and 4 sensitive wildlife species. A discussion of the sensitive resources deemed to have potential to occur on site is included below.

3.2.1 Special-status Plant Species

A late fall botanical survey was completed within the proposed project area, which is outside the typical blooming period for regionally-occurring special-status species. Based on this evaluation and a review of the relevant literature, it was determined that 7 special-status plant species have low potential to occur unless their absence can be confirmed through appropriately timed surveys. Additionally, individual oak trees (*Quercus* spp.) and oak woodlands are considered a sensitive resource by the state of California and impacts must be included in the California Environmental Quality Act (CEQA) project review process. Several mature valley oaks are present within close proximity to the proposed development area and, as such, are discussed below (see Appendix E - Representative Site Photographs).

Oval-leaved Snapdragon (Antirrhinum ovatum), California Rare Plant Rank (CRPR) 4.2

Oval-leaved snapdragon is an annual herb that is endemic to California. Its known range is concentrated along the eastern edge of the Inner South Coast Ranges from central Monterey County to northern Santa Barbara County. This species typically occurs in heavy



clay soils in association with various vegetation communities including grassland, chaparral, and woodland. It has been documented at elevations ranging from 200 to 1,400 meters (m) and is known to tolerate some disturbance. The typical blooming period is from May to July (Jepson eFlora 2016). Documented threats to this species include grazing and vehicle traffic. This species is known to germinate in cyclic phases, with large populations appearing every 20 to 50 years (Jepson eFlora 2016). According to CNDDB records (2016), the nearest documented occurrence is approximately 1.3 miles northeast of the site. Although marginally suitable habitat for this species is present on site, the long history of substantial surface disturbance makes it unlikely for this species to occur. As such, this species is not expected to occur on site.

Round-leaved Filaree (California macrophylla), CRPR 1B.2

Round-leaved filaree is an annual herb that is known to occur from the northern end of the Sacramento Valley, south along the western edge of the Central Valley and South Coast Ranges and nearly to the California-Mexico border. This species typically occurs in association with grassland and scrub habitats on clay or occasionally serpentine soils at elevations below 1,200 m. The typical blooming period is from March to July (Jepson eFlora 2016). According to CNDDB (2016) records, the nearest documented occurrence of this species is approximately 1.3 miles northeast of the site. Although marginally suitable habitat for this species is present on site, the long history of substantial surface disturbance makes it unlikely for this species to occur. As such, this species is not expected to occur on site.

San Luis Obispo Owl's Clover (Castilleja densiflora subsp. obispoensis), CRPR 1B.2

San Luis Obispo owl's clover is an annual herb that is endemic to San Luis Obispo County. Specifically, it is known to occur mostly in coastal areas along the Outer South Coast Ranges from just south of Ragged Point to Avila Beach, with several populations occurring in the Irish Hills. This species typically occurs in coastal grasslands at elevations below 400 m, and may be somewhat tolerant of disturbance. The typical blooming period is from March to June (Jepson eFlora 2016). According to CNDDB (2016) records, the nearest documented occurrence of this species is approximately 1.3 miles southwest of the site. Although marginally suitable habitat for this species is present on site, the long history of substantial surface disturbance makes it unlikely for this species to occur. As such, this species is not expected to occur on site.

Lemmon's Jewelflower (Caulanthus lemmonii), CRPR 1B.2

Lemmon's jewelflower is an annual herb that is endemic to California. It is known to occur throughout the Inner and Outer South Coast Ranges and along the western foothills of the San Joaquin Valley, with unconfirmed populations extending east along the Transverse Ranges and into the northwest corner of the Mojave Desert. This species typically occurs in grassland, chaparral, and scrub communities at elevations ranging from 80 to 1,100 m. The typical blooming period is from March to May (Jepson eFlora 2016). According to CNDDB



(2016) records, the nearest documented occurrence of this species is approximately 1.7 miles southwest of the site. Although marginally suitable habitat for this species is present on site, the long history of substantial surface disturbance makes it unlikely for this species to occur. As such, this species is not expected to occur on site.

Small-flowered Morning-glory (Convolvulus simulans), CRPR 4.2

Small-flowered morning-glory is an annual herb that is native to California and Baja California. Known populations are concentrated along the southern coast of California between Los Angeles and Baja, with scattered populations occurring throughout the Inner and Outer South Coast Ranges and in the Sierra Nevada foothills. This species typically occurs on clay soils in grassland, coastal sage scrub, and chaparral communities at elevations ranging from 30 to 875 m. The typical blooming period is from April to June (Jepson eFlora 2016). According to CNDDB (2016) records, the nearest documented occurrence of this species is approximately 2.2 miles northeast of the site. Although marginally suitable habitat for this species is present on site, the long history of substantial surface disturbance makes it unlikely for this species to occur. As such, this species is not expected to occur on site.

Gypsum-loving Larkspur (Delphinium gypsophilum), CRPR 3.2

Gypsum-loving larkspur is perennial herb that is endemic to California. Its known range is concentrated along the western and southern edges of the San Joaquin Valley, and extends west into the Inner and Outer South Coast Ranges from southern Monterey County to northern Santa Barbara County. This species typically occurs in open grassland and oak woodland habitat at elevations ranging from 90 to 1,200 m. The typical blooming period is from February to June (Jepson eFlora 2016). According to CNDDB (2016) records, the nearest documented occurrence of this species is approximately 4.8 miles southwest of the site. Although marginally suitable habitat for this species is present on site, the long history of substantial surface disturbance makes it unlikely for this species to occur. As such, this species is not expected to occur on site.

Santa Lucia dwarf rush (Juncus luciensis), CRPR 1B.2

Santa Lucia dwarf rush is an annual herb that is known from several populations along the central and southern coast, as well as areas in the northeast portion of the state from Lake Tahoe to the Modoc Plateau. This species typically occurs in a variety of seasonally and perennially wet habitats, including seeps, meadows, vernal pools, along streams, and in roadside ditches. It is known to occur at elevations ranging from 300 to 1,900 m. The typical blooming period for this species may span from April through August (Jepson eFlora 2016). Threats to this species may include development and grazing. According to CNDDB (2016), the nearest documented occurrence of this species is approximately 6.3 miles south of the survey area. Although marginally suitable habitat features are present on site (i.e., ephemeral drainage, cattail marsh), these areas are highly degraded. Further, no impacts to





these areas are proposed as part of the project. As such, no impacts to this species are expected to occur.

Valley Oak (*Quercus lobata*), Protection under CEQA

Impacts to or removal of any mature oak species (i.e., greater the 6 inches) are regulated by the City of Paso Robles, Ordinance No. 835 N.S. Several mature valley oak trees are present within the blue line drainage and others are present in the remainder of the survey area. One mature individual is located immediately adjacent to the project area. However, preliminary construction drawings have been modified to avoid impacts to individual oak trees. If any impacts (e.g., trimming, removal, compaction within root zone, etc.) occur, mitigation in the form of on-site plantings or off-site protection of existing oak woodland may be required, per any conditions in the City permit.

3.2.2 Special-status Wildlife Species

A list and description of the sensitive wildlife species with potential to occur, their habitats, conservation status, and their likelihood for occurrence within the survey area is provided below.

Sensitive Mammal Species

San Joaquin kit fox (*Vulpes macrotis mutica*), State Status – Endangered, Federal Status – Endangered

This species is the smallest member of the canine family of North America. The SJKF typically occurs in grasslands and scrublands with low-growth vegetation in arid climates and areas of low precipitation levels (generally less than 10 inches per year). The SJKF is nocturnal, but individuals may be seen during the day. They dig burrows or occupy abandoned burrows from other species and utilize the underground refugia year-round for cover and reproduction.

Habitat for this species within the survey area is extremely limited. Ongoing discing operations have had a significant negative effect on the availability and persistence of underground cover and prey species (e.g., kangaroo rats and California ground squirrels) and the site has poor connectivity to other occupied SJKF habitats (i.e., core populations). In accordance with the USFWS Standardized Recommendations for Protection of the Endangered SJKF (2011), one potential den was observed along the cemetery fence line bordering the project parcel. This burrow is likely being utilized by California ground squirrels, but due to its size and depth, it may provide a suitable refugium for SJKF if they are present.

There are no known extant populations of SJKF in the region, and at present, SJKF are not expected to occur within the survey area. As such, they are not likely to be directly impacted by the proposed project. If habitat conditions improve with adjustments to land management, the potential for the species to occur may increase accordingly. As discussed



below in Section 3.2.3, the project area falls within the County-designated SJKF mitigation area.

Sensitive Invertebrate Species

Vernal pool fairy shrimp (VPFS; *Brachinecta lynchi*), Federal Status – Threatened VPFS typically occupy vernal pools, which are defined as shallow depressions in relatively flat grassland areas lined with impervious clay pan bottoms that hold rain water for a period of weeks to months. This species will exist in a dormant life phase until triggered by adequate moisture and heat to complete a short-lived life cycle. Breeding generally occurs between December and May. VPFS are known to occur throughout the Central Valley from Shasta to Tulare County and along the Coast Range region from Solano to San Luis Obispo and Santa Barbara County.

Critical Habitat – The USFWS designated Critical Habitat for this species in 2002 and the area encompasses the entire survey area, much of eastern Paso Robles, as well as a number of fragmented geographic areas in the region. The species was also documented in the CNDDB search, approximately 2 miles southeast of the survey area. As described by the USFWS in 2002, Primary Constituent Elements (PCE) are essential physical and biological characteristics of habitat required to support VPFS, and they include the presence of (1) inundated depressions that hold water for sufficient lengths of time, and (2) the correct topography and hydrology to maintain vernal pool complexes. These elements were not observed on site.

Immediately preceding the survey, 1.01" inches of rain had fallen at the Airport and, although saturated soils were present, no ponded water beyond the drainage channel was observed. Historically, this area may have supported vernal pools and/or VPFS. However, the high level of ongoing disturbance at project parcel has either eliminated the VPFS PCEs from the site, or they do not occur. No suitable habitat was observed within the survey area and this species is not expected to be present.

Sensitive Amphibian Species

Western spadefoot toad (Spea hammondii), State Status - Species of Special Concern (SSC) Western spadefoot toad generally inhabits lowlands, sandy washes, and river flood plains but also may be found in woodlands, grasslands, and chaparral where soils are sandy and loose. This species will occupy small mammal burrows where it may remain buried until the rainy season when it emerges to breed in ephemeral or seasonal pools. Threats to this species include loss, degradation, and fragmentation of breeding and upland habitats.

Low to moderately suitable habitat for this species is present within the blue line drainage west of the proposed project site and perhaps within the cattail marsh to its south. Underground refugia is present in these areas (i.e., where discing has not occurred) and no dispersal barriers exist in the main drainage to prevent this species from migrating between



downstream areas that may hold water for longer periods of time. This species is not expected to occur beyond the channel margins.

Sensitive Reptile Species

Western pond turtle (Actinemys marmorata), State Status - SSC

Western pond turtles are commonly found in a variety of freshwater aquatic habitats including ponds, lakes, rivers, streams, and marshes. Preferentially, this species utilizes deeper pools with abundant vegetation and muddy bottoms where it can burrow in the mud to hibernate during winter months or aestivate during summer droughts. Pond turtles are omnivorous, utilizing food sources such as aquatic plants, invertebrates, frog eggs, crayfish, and occasionally fish. Historically, this turtle was distributed along the entire west coast from British Columbia to Baja California, but has become extirpated in much of its southern range as well as highly fragmented north of California (Californiaherps.com 2016).

Although this species was not observed on site, nor was it recorded in the CNDDB within 2 miles, there is low to marginally suitable habitat present within and along the blue line drainage corridor. When water is present, the habitat quality increases and the potential for encounter also increases.

Migratory Nesting Birds and Sensitive Avian Species Migratory Nesting Birds

All avian species, with exceptions of introduced species, are protected by state and federal legislature, most notably the Migratory Bird Treaty Act (MBTA) and the CDFW Fish and Game code. Collectively, these and other international regulations make it unlawful to collect, sell, pursue, hunt, or kill native migratory birds, their eggs, nests, or any parts thereof. The laws were adopted to eliminate the commercial market for migratory bird feathers and parts, especially those of larger raptors and other birds of prey.

Avian species can be expected to occur within the survey area during all seasons and throughout construction of the proposed project. The potential for encounter and to disrupt these species is highest during their nesting season (generally February 1 through September 15) when nests are likely to be active, and eggs and young are present. Large oak trees present the highest quality habitat for nesting at the site. Raptors are particularly drawn to large trees and structures, and they are generally less tolerant of disturbances than other species.

Golden eagle (*Aquila chrysaetos*), a Fully Protected species, was documented nesting in 2006 within 2 miles of the project area (CNDDB). The large oak trees within and around the survey area provide suitable nesting habitat and due to the high site and regional fidelity of eagles, there is potential for this species to occur. Large buffer areas (e.g., 0.50-mile) are typically required by resource agencies for construction around fully protected species.





3.2.3 Sensitive Habitats

Federal and State Waters and Wetlands

The unnamed blue line drainage was identified as jurisdictional waters of the U.S. and State due to the presence of a well-defined bed/bank, water ponding and flow during the survey, and a significant nexus to navigable waters of the U.S. (i.e., the Salinas River). Any impacts proposed within the channel of this drainage would require appropriate permits and mitigation, per U.S. Army Corps of Engineers (Corps), Regional Water Quality Control Board (RWQCB), and CDFW requirements. No impacts to this feature or the cattail marsh (likely jurisdictional as well) have been proposed. The upland swale located east of the proposed development is likely not a jurisdictional hydrological feature but has been avoided through project design.

County-designated SJKF Mitigation Area

CDFW and the USFWS have worked with the County to ensure that impacts to SJKF and its habitat are mitigated to an insignificant level before project permits are issued. As such, zones of pre-determined compensation ratios have been established in northern San Luis Obispo County to guide the permitting process for project applicants and influence construction crew awareness. Per the County's SJKF Standard Mitigation Ratio Areas map, the project area is located within the 3 to 1 mitigation ratio area.

USFWS-designated Critical Habitats

The entire survey area, including the approximately 24.6-acre proposed development area, falls within Critical Habitat for VPFS. However, as previously discussed, the two PCEs described by the USFWS are absent from the survey area. As such, consultation and subsequent permitting for construction within Critical Habitat is not required.

No other Critical Habitat occurs within the survey area.

3.3 Habitat Connectivity

Maintaining connectivity between areas of suitable habitat is critical for dispersal, migration, foraging, and genetic health of plant and wildlife species. The project site is located in a semirural area of Paso Robles, near the City limit, with low- to moderate-density residential and high density agricultural parcels nearby (i.e., within 1 mile). The project site is situated within a pocket of land (approximately 1,500 to 2000 acres) that has remained undeveloped, likely due to its proximity to the Airport and the associated land ownership. Existing barriers to migration to and from the site, particularly for wildlife, are influenced by the high density of agriculture in the region. This typically correlates a high frequency of land manipulation, a number of wildlife exclusion fences, and pest management activities. As a result, natural habitat features are currently highly fragmented on all sides of the project site. Corridors for unimpeded movement are generally limited to small drainages and creek beds such as Huerhuero Creek, the Estrella River, and the Salinas River.





The proposed solar project is not expected to substantially increase the level of fragmentation in the region nor is it expected to create a barrier to terrestrial migration. If the recommended mitigation measures provided below are adopted, the new fence lines would allow for passage of small mammals, particularly SJKF, through the site. Large animals would be expected to travel around the facility. No passage barriers in the ephemeral drainage are proposed.

4.0 IMPACT ASSESSMENT AND MITIGATION

4.1 Summary of Potential Impacts

The proposed project has a limited potential to directly and/or indirectly impact sensitive plant communities and/or special-status wildlife species. Direct impacts could result from injury or death via construction-related disturbances such as trampling or crushing from equipment or other construction activities such as grading, vegetation trimming or removal, and excavation. Indirect impacts could result from construction noise, harassment, dust emissions, or other disruption during construction activities, including long-term modifications to habitat such as the permanent conversion from open land to man-made structures.

The total area of disturbance is estimated to be 24.6 acres.

4.1.1 Impacts to Special-status Plants

Special-status Plants

No special-status plants were documented within the survey area during the site survey. However, due to inconclusive results of the off-season botanical survey, impacts may occur to those species discussed in section 3.2.1 if they are present. Direct impacts may occur if the seed bank or mature individuals are impacted during project implementation. The avoidance and minimization measures recommended below propose to conduct a spring botanical survey (i.e., timed to coincide with the typical blooming period for potentially occurring species) and to develop and implement a mitigation plan for impacts to special-status plants, if present.

Oak Trees

Several mature oak trees are located within 100 feet of the proposed development. It is expected that all oak trees will ultimately be avoided during construction; however, if plans are adjusted, there is potential for trimming, impacts to critical root zones and/or removal to occur. Per the Paso Robles City Oak Tree Preservation Ordinance (City of Paso Robles, 2016), the project owner would be required to consult with the City for potential oak tree impacts. This will require the implementation of oak tree protection measures during construction (i.e., protective fencing) as well as mitigation for impacts to any oak trees which will require oak tree replacement planting coinciding with the level of impact. No further oak tree mitigation is proposed beyond the established City ordinance.



4.1.2 Impacts to Special-status Wildlife

Reptiles and Amphibians

No impacts to western spadefoot toad or western pond turtle are expected. Although each of these species may travel into upland areas periodically, the onsite drainage provides only marginally suitable habitat for these species, and if present, they would most likely only occur within the channel feature and immediate surrounding areas (i.e., stream banks and adjacent areas containing intact vegetation). Construction plans do not propose any construction closer than 50 feet of the drainage channel.

Sensitive and Nesting Birds

Direct impacts to golden eagles or other bird species are most likely to occur if construction activities take place during the typical avian nesting season, generally February 1 through September 15, and as early as January for golden eagles. Indirect impacts may occur due to habitat loss (e.g., removal of suitable nesting trees) or construction-related disturbances that may deter nesting or cause nests to fail.

4.1.3 Impacts to Sensitive Communities and Habitats

Natural Vegetation Communities

The proposed project has been designed to avoid the cattail marsh located at the southeast corner of the survey area. As such, no impacts to this natural community will occur. The majority of the proposed development will occur in the annual brome grassland and impacts associated with construction will include both temporary and permanent disturbances to this community. However, no sensitive natural communities are present with the proposed project footprint and therefore no impacts will occur.

Hydrological Resources

No direct impacts will occur within the blue line drainage channel or abutting vegetation (i.e., vegetation within 50 feet). In accordance with the State Water Resources Control Board Construction General Permit and existing City ordinances, the owner will be required to implement appropriate measures (e.g., the development of a Stormwater Pollution Prevention Plan, implementation of setbacks, and/or installation of fiber rolls, silt fencing, and other best management practices) that address potential indirect and secondary water quality impacts to the drainage. As such, no further mitigation has been recommended for impacts associated with the onsite hydrological resources.

If project plans are altered, resulting in impacts to the blue line drainage or upland swale, the owner would be responsible for obtaining all necessary agency permits (e.g., CDFW, Corps, and RWQCB) with likely jurisdiction over those project areas.





County-designated SJKF Mitigation Area

Approximately 24.6 acres of land is proposed to be impacted within the County-designated 3 to 1 mitigation ratio area. For projects under 40 acres in size, project proponents have the option of accepting the County mitigation ratio or contesting the ratio with the completion of a SJKF habitat evaluation. Following acceptance of the original or a new ratio, the project owner must contribute to the preservation of habitat through a conservation easement agreement, compensation to a pre-determined mitigation bank (presently Palo Prieto Conservation Bank), or payment of an in-lieu fee to the San Francisco office of The Nature Conservancy.

4.2 Recommended Mitigation Measures

The following avoidance and minimization measures are recommended to reduce the anticipated impacts to the extent feasible.

4.2.1 General Mitigation Measures

Mitigation Measure 1: Environmental Awareness Training

An environmental awareness training shall be presented by a qualified biologist to all construction personnel prior to start of project activities. The environmental training shall include an overview of special-status species and sensitive resources with potential to occur on the project site, habitat requirements, and their protection status.

Mitigation Measure 2: Operations and Site Maintenance

The following general measures are recommended to minimize impacts during active construction:

- The use of heavy equipment and vehicles shall be limited to the proposed project limits and defined staging areas/access points. The boundaries of each work area shall be clearly defined and marked with high visibility fencing. No work shall occur outside these limits.
- Secondary containment such as drip pans shall be used to prevent leaks and spills of potential contaminants.
- Washing of concrete, paint, or equipment, and refueling and maintenance of equipment shall occur only in designated areas. Sandbags and/or absorbent pads shall be available to prevent water and/or spilled fuel from leaving the site.
- Construction equipment shall be inspected by the operator regularly to ensure that equipment is in good working order and no fuel or lubricant leaks are present.

4.2.2 Mitigation for Impacts to Special-status Plants

Mitigation Measure 3: Special-status Plants

An appropriately-timed botanical survey(s) will be conducted by a qualified botanist during the typical blooming period (i.e., April - June) for the potentially occurring sensitive plant species listed in Section 3.2.1. The survey will be conducted in all areas proposed for temporary or permanent construction activity, including temporary access roads, staging yards, and laydown areas.



- As a primary goal, any sensitive plant species encountered during the survey(s) shall be flagged for avoidance and construction activities shall avoid the marked areas to the maximum extent feasible.
- If no special-status plants are observed, no further action is required.
- If sensitive plant individuals or communities cannot be avoided during construction (i.e., if avoidance is deemed infeasible), a mitigation plan for impacts to special-status plants shall be developed prior to the onset of construction and implemented during construction.

At a minimum, the Plan shall:

- Discuss the proposed construction methods, construction schedule, and the implementation schedule of activities proposed as part of the Plan.
- Quantify the anticipated acreages of impact to special-status plant species.
- Identify each special-status plant species observed on site, including a description of the mitigation activities proposed for each. As appropriate, the measures shall include:
 - A detailed description of topsoil salvage procedures and long-term soil stockpile storage methods;
 - Methods and timing of any proposed seed collection and storage;
 - o Locations and demarcation of full-time avoidance areas during construction;
 - Locations and methods for restoration, replanting and/or reseeding (e.g., decompaction, recontouring, scarification, mulching, hand broadcasting, hydroseeding, etc.); and,
 - Short- and/or long-term monitoring protocols and/or vegetative growth success criteria for restoration.
- Include a requirement for photographic documentation and a post-implementation report.

The Plan shall be submitted for approval to CDFW and the City prior to the onset of construction.

4.2.3 Mitigation for Impacts to Special-status Wildlife

Mitigation Measure 4: Aquatic Habitat

All temporarily disturbed areas (e.g., access routes, staging areas, and stockpile areas) will be located at a minimum of 50 feet from any water feature (i.e., the blue line drainage and upland swale). This distance should be maximized wherever feasible.

Mitigation Measure 5: Lighting

All exterior lighting will be placed or shielded to avoid lighting of open space areas and/or drainages. No permanent night lighting will be installed, except for security and maintenance needs of the constructed facility. Temporary construction lighting will be kept to the minimum



amount necessary and shall be directed toward active work areas and away from open spaces and/or drainages.

Mitigation Measure 6: Pre-construction Survey for All Sensitive Wildlife

A qualified biologist shall conduct a pre-activity survey immediately prior to the initiation of initial project activities to ensure special-status wildlife species are not present during the start of construction. In the event sensitive wildlife species are found, they shall be allowed to leave the area on their own volition, relocated (as permitted) to suitable habitat areas located outside the work area(s), or resources agencies will be contacted for further guidance. Pre-activity surveys will include a general assessment for all sensitive resources with potential to be impacted, but focusing on SJKF and associated potential den sites.

Mitigation Measure 7: Pre-construction Survey for Nesting Birds

If work is planned to occur between February 1 and September 15, a qualified biologist shall survey the area for nesting birds within one week prior to activity beginning on site. If nesting birds are located on or near the proposed project site, they shall be avoided until they have successfully fledged. A non-disturbance buffer of 50 feet will be placed around non-listed, passerine species, and a 250-foot buffer will be implemented for raptor species. All activity will remain outside of that buffer until a qualified biologist has determined that the young have fledged or that proposed construction activities would not cause adverse impacts to the nest, adults, eggs, or young. If special-status avian species are identified, no work will begin until an appropriate buffer is determined in consultation with the local CDFW biologist, and/or the USFWS.

Mitigation Measure 8: County Standard Mitigation of Impacts to SJKF Habitat

In accordance with the County Guide to SJKF Mitigation Procedures Under CEQA, the project owner shall adopt the Standard Kit Fox CEQA Mitigation Measures and shall be included on development plans. The following summarizes those that are applicable to this project:

- The applicant shall mitigate for the loss of kit fox habitat either by:
 - 1. Establishing a conservation easement on-site or off-site in a suitable San Luis Obispo County location and provide a non-wasting endowment for management and monitoring of the property in perpetuity;
 - 2. Depositing funds into an approved in-lieu fee program; or
 - 3. Purchasing credits in an approved conservation bank in San Luis Obispo County.
- A maximum 25 mph speed limit shall be required at the project site during construction activities.
- All construction activities shall cease at dusk and not start before dawn.
- A qualified biologist shall be on-site immediately prior to initiation of project activities to inspect for any large burrows (e.g., known and potential dens) and to ensure no wildlife



are injured during project activities. If dens are encountered, they should be avoided as discussed below.

- Exclusion zone boundaries shall be established around all known and potential kit fox dens.
- All excavations deeper than 2 feet shall be completely covered at the end of each working day.
- All pipes, culverts, or similar structures shall be inspected for SJKF and other wildlife before burying, capping, or moving.
- All exposed openings of pipes, culverts, or similar structures shall be capped or temporarily sealed prior to the end of each working day.
- All food-related trash shall be removed from the site at the end of each work day.
- Project-related equipment shall be prohibited outside of designated work areas and access routes.
- No firearms shall be allowed in the project area.
- Disturbance to burrows shall be avoided to the greatest extent feasible.
- No rodenticides or herbicides should be applied in the project area.
- Permanent fences shall allow for SJKF passage through or underneath (i.e., an approximate 4-inch passage gap shall remain at ground level).

5.0 CONCLUSION

No special-status species were observed during the field survey; however, there is a low potential for special-status plants and wildlife to occur within the project area based upon the presence of marginally suitable habitat. Wildlife species that have the potential to occur include: western spadefoot toad, western pond turtle, and San Joaquin kit fox. No special-status plants were observed; however, there is potential for up to 7 CRPR-ranked species to be present. The project has been designed to avoid impacts to the blue line drainage, the upland swale feature, and all mature oak trees are expected to be avoided. Implementation of the recommended mitigation measures will avoid and/or minimize impacts to potentially occurring sensitive resources to a less than significant level.



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APPENDIX A - MAPS

Figure 1 – Project Vicinity Map

Figure 2 – Survey Area Map

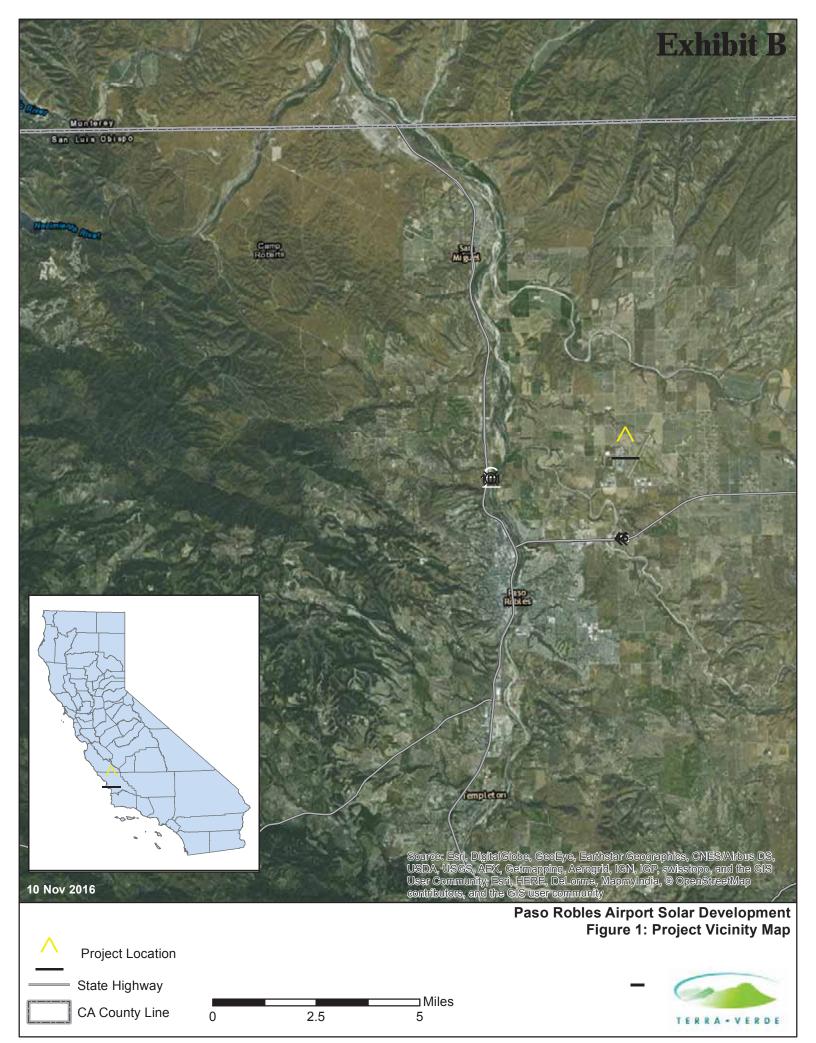
Figure 3 – 5-mile CNDDB and Critical Habitat Map

Figure 4 – Soils Map

Figure 5 – Vegetation Communities Map



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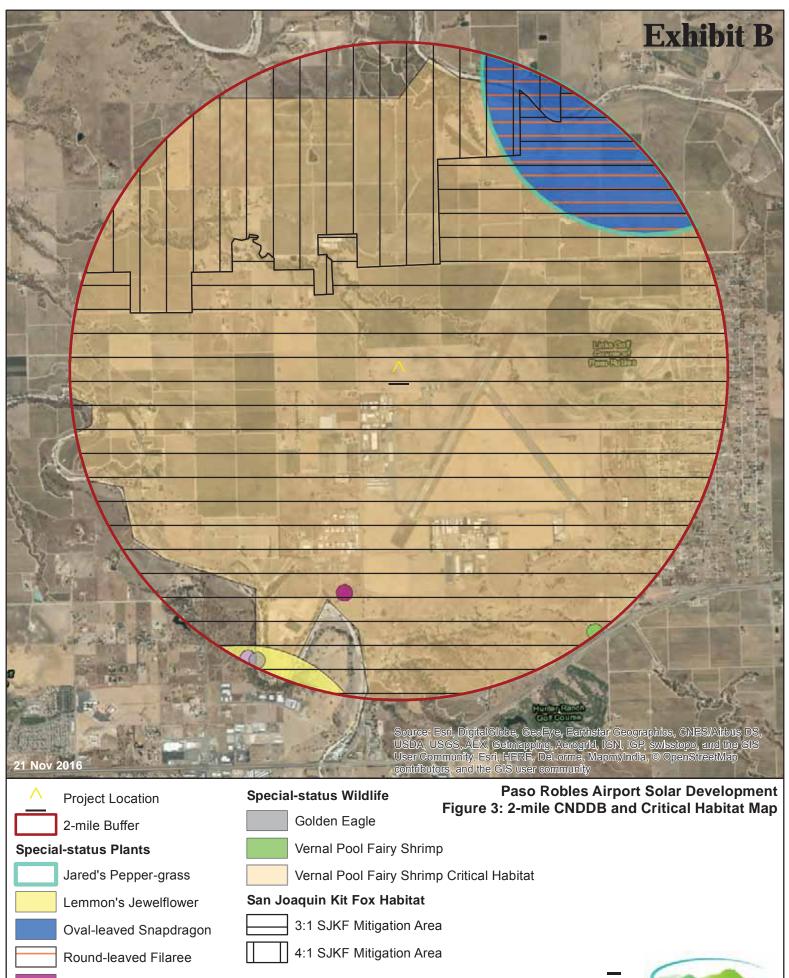


Approximate Survey Boundary Blue Line Stream (SLO County)

- Upland Swale (Terra Verde)

Paso Robles Airport Solar Development Figure 2: Survey Area Map





San Luis Obispo Owl's-clover

Shining Navarretia

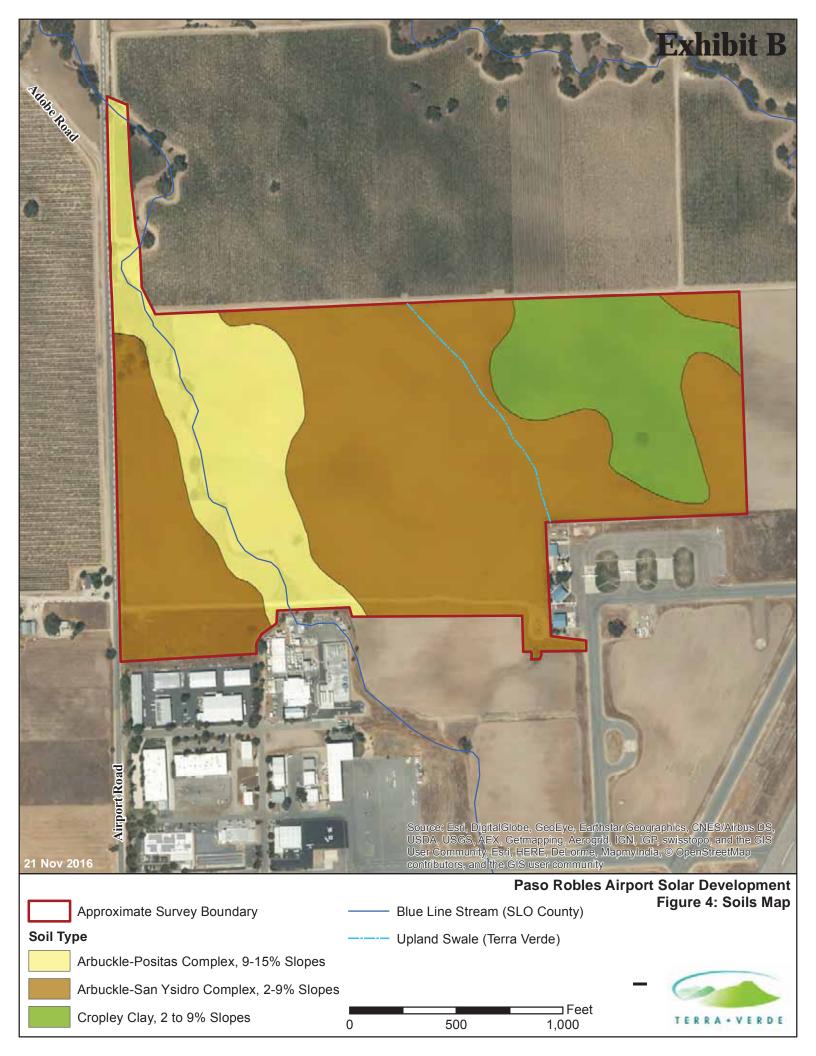
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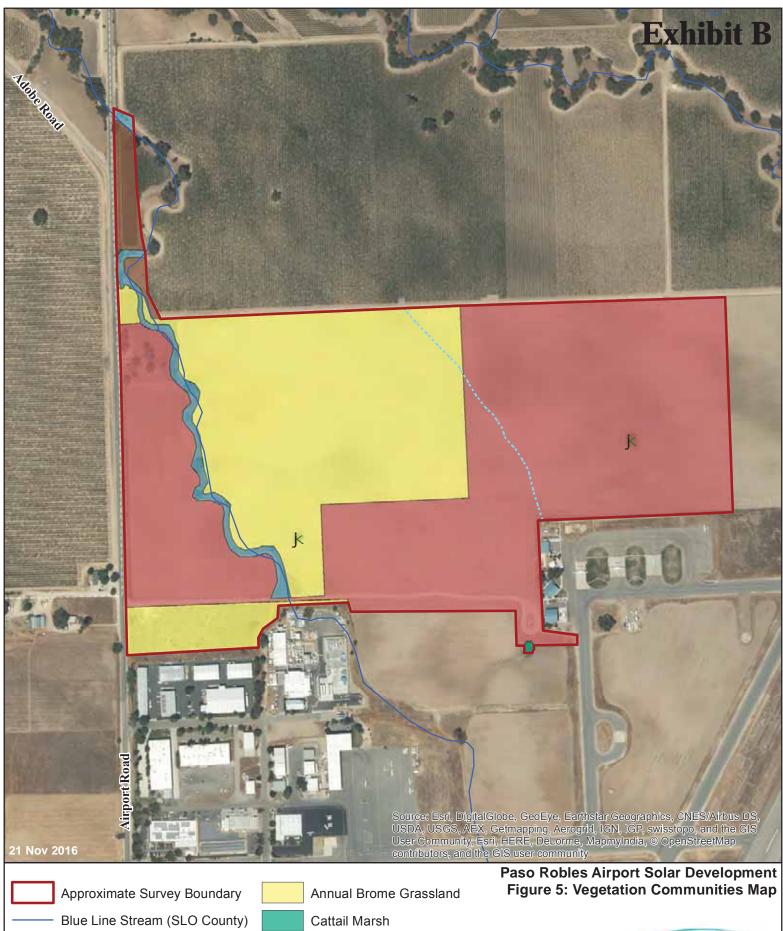
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⊐Miles

TERRA - VERDE

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Upland Swale (Terra Verde)

Community/Land Cover

Active Agriculture





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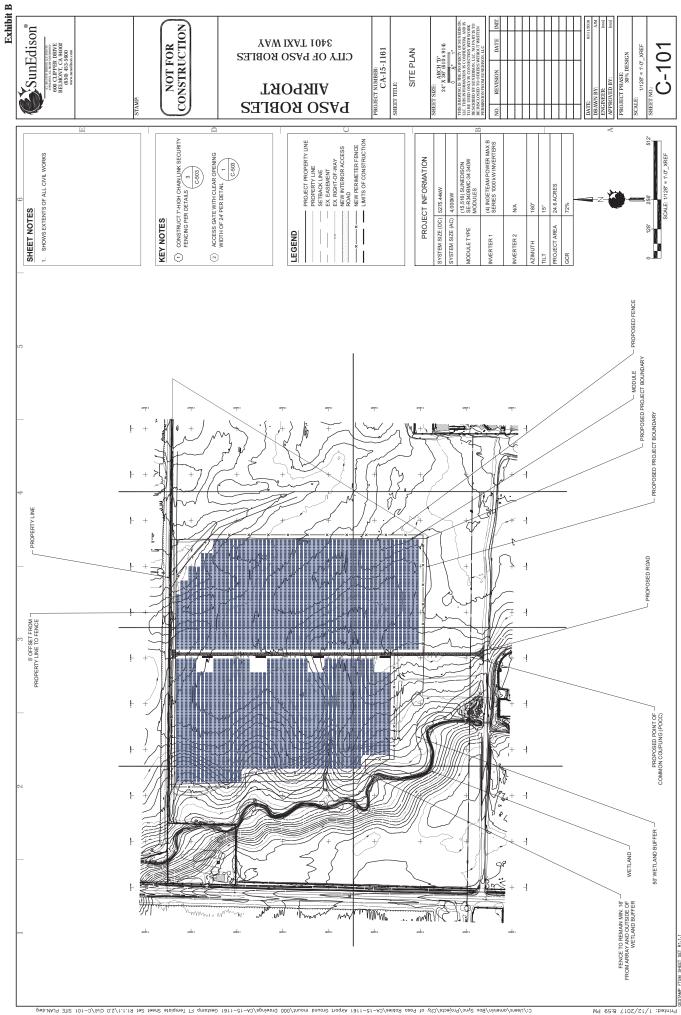
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APPENDIX B – Project Site Plans



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Appendix C – Botanical and Wildlife Species Observed



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Paso Robles Airport Solar Development Botanical Species Observed October 28, 2016

*Indicates non-native species		
Scientific Name	Common Name	
Amaranthaceae	Amaranth Family	
Amaranthus albus*	Tumbleweed	
Apiaceae	Carrot Family	
Foeniculum vulgare*	Fennel	
Apocynaceae	Dogbane Family	
Nerium oleander*	Common oleander	
Asteraceae	Sunflower Family	
Baccharis pilularis	Coyote bush	
Baccharis salicifolia subsp. salicifolia	Mule fat	
Carduus pycnocephalus subsp. pycnocephalus*	Italian thistle	
Centaurea solstitialis*	Yellow star-thistle	
Centromadia sp.	Spikeweed	
Cirsium vulgare*	Bull thistle	
<i>Deinandra</i> sp.	Tarplant	
Erigeron bonariensis*	Flax-leaved horseweed	
Heterotheca grandiflora	Telegraph weed	
Lactuca serriola*	Prickly lettuce	
Stephanomeria sp.	Wire lettuce	
Boraginaceae	Borage Family	
Heliotropium curassavicum var. oculatum	Alkali heliotrope	
Hirschfeldia incana*	Mediterranean hoary mustard	
Caryophyllaceae	Pink Family	
Cerastium glomeratum*	Sticky mouse-ear chickweed	
Chenopodiaceae	Goosefoot Family	
Salsola tragus*	Russian thistle	
Convolvulaceae	Morning-glory Family	
Convolvulus arvensis*	Bindweed	
Euphorbiaceae	Spurge Family	
Croton setiger	Turkey-mullein	
Fabaceae	Pea Family	
Acmispon sp.	Deervetch	
Vicia villosa*	Hairy vetch	
Fagaceae	Oak Family	
Quercus douglasii	Blue oak	
Quercus lobata	Valley oak	

*Indicates non-native species



	Geranium Family
Erodium cicutarium*	Redstem filaree
Lamiaceae	Mint Family
Trichostema lanceolatum	Vinegar weed
Malvaceae	Mallow Family
Malva parviflora*	Cheeseweed
Onagraceae	Evening-primrose Family
Epilobium brachycarpum	Annual fireweed
Pinaceae	Pine Family
Pinus sp. (ornamental)*	Pine
Pinus sabiniana	Foothill pine
Plantaginaceae	Plantain Family
Plantago lanceolata*	English plantain
Poaceae	Grass Family
Avena barbata*	Slender wild oat
Bromus diandrus*	Ripgut grass
Bromus madritensis subsp. rubens*	Red brome
Festuca myuros*	Rattail sixweeks grass
Festuca perennis*	Rye grass
Hordeum vulgare*	Barley
Polygonaceae	Buckwheat Family
Polygonum aviculare*	Knotweed
Rumex crispus*	Curly dock
Salicaceae	Willow Family
Populus trichocarpa	Black cottonwood
Salix lasiolepis	Arroyo willow
Solanaceae	Nightshade Family
Datura wrightii	Jimson weed



Paso Robles Airport Solar Development Wildlife Species Observed October 28, 2016

*Indicates non-native species	
Scientific Name	Common Name
Invertebrate Species	
Order Coleoptera	Ladybird
Order Coleoptera	Stinkbug
Order Hymenoptera	Black ant
Order Odonata	Dragon fly
Order Orthoptera	Grasshopper
Avian Species	
Aphelocoma californica	California scrub-jay
Callipepla californica	California quail
Carduelis psaltria	Lesser goldfinch
Carpodacus mexicanus	House finch
Cathartes aura	Turkey vulture
Chondestes grammacus	Lark sparrow
Circus cyaneus	Northern harrier
Falco mexicanus	Prairie falcon
Falco spaverius	American kestrel
Lanius Iudovicianus	Loggerhead shrike
Mimus polyglottos	Northern mockingbird
Sayornis saya	Say's phoebe
Streptopelia decaocto	Eurasian collared dove
Sturnus vulgaris	European starling
Toxostoma redivivum	California thrasher
Mammal Species	
Canis latrans	Coyote
Otospermophilus beecheyi	California ground squirrel
Reptiles and Amphibians	
Sceloporus occidentalis	Western fence lizard



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APPENDIX D -Regionally Occurring Special-Status Species



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Regionally occurring special-status species list for the Paso Robles and surrounding 7.5-minute quadrangles: Adelaida, Bradley, Creston, Estrella, Ranchito Canyon, San Miguel, Templeton, and York Mountain (CNDDB 2016; CNPS 2016; CCH 2016).

	VEGETATION COMMUNITIES	MUNITIES	
Community Name	Description	Observed on Site?	Comments
Valley Oak Woodland	Open, grassy-understoried savanna rather than a closed-canopy woodland. Quercus lobata is usually the only tree present, and most stands have an open canopy. Usually occurs on deep, well-drained alluvial soils, usually in valley bottoms.	No	Several valley oaks were documented on site, but they are primarily concentrated along the degraded blue line drainage on site. These individuals, and the surrounding understory habitats do not constitute valley oak woodland habitat.



			PLANTS		
Scientific/Common Name	Listing Status ¹	Blooming Period ²	Habitat Type ²	Observed on Site?	Comments
Abies bracteata Bristlecone fir	CRPR 1B.3	N/A	Steep, rocky, fire-resistant slopes; generally in canyon-live- oak phase of mixed-evergreen forest. Elevation: 210 - 1,600 m.	0 N	No suitable habitat on site; not observed during appropriately timed surveys.
Amsinckia douglasiana Douglas' fiddleneck	CRPR 4.2	March - June	Unstable, shaly, sedimentary slopes. Elevation: 100 – 1,600 m.	N	No suitable habitat on site; not detected during late fall surveys.
Agrostis hooveri Hoover's bent grass	CRPR 1B.2	April - August	Dry sandy soils, open chaparral, oak woodland. Elevation: < 600 m.	N	No suitable habitat on site; not detected during late fall surveys.
Antirrhinum ovatum Oval-leaved snapdragon	CRPR 4.2	VluL - Vluly	Heavy, adobe-clay soils on gentle, open slopes, and disturbed areas. Elevation: 200 - 1,400 m.	No	Suitable habitat present on site; not detected during late fall surveys.
Arctostaphylos hooveri Hoover's manzanita	CRPR 4.3	February - April	Rocky slopes, upland chaparral, open ponderosa-pine forest near coast. Elevation: 450 - 1,100 m.	No	No suitable habitat on site; not observed during appropriately timed surveys.
Arctostaphylos obispoensis Bishop manzanita	CRPR 4.3	February - March	Rocky, generally serpentine soils, chaparral, open closed- cone forest near coast. Elevation: 60-0 950 m.	No	No suitable habitat on site; not observed during appropriately timed surveys.
Aristocapsa insignis Indian Valley spineflower	CRPR 1B.2	May - June	Sand, typically in association with foothill woodlands. Elevation: 300 - 600 m.	No	No suitable habitat on site; not detected during late fall surveys.



		4	PLANTS		
Scientific/Common Name	Listing Status ¹	Blooming Period ²	Habitat Type ²	Observed on Site?	Comments
Astragalus macrodon Salinas milk-vetch	CRPR 4.3	April - June	Eroded pale shales or sandstone, serpentine alluvium. Elevation: 200 - 1,550 m.	N	No suitable habitat on site; not detected during late fall surveys.
California macrophylla Round-leaved filaree	CRPR 1B.2	March - July	Open sites, grassland, scrub on vertic clay and occasionally serpentine. Elevation: < 1,200 m.	N	Suitable habitat present on site; not detected during late fall surveys.
Calochortus simulans La Panza mariposa lily	CRPR 1B.3	May - July	Sand (often granitic), grassland, and yellow pine forest. Elevation: < 1,100 m.	N	No suitable habitat on site; not detected during late fall surveys.
Calycadenia villosa Dwarf calycadenia	CRPR 1B.1	May- September	Dry, rocky hills, ridges, grassland, openings in foothill woodland. Elevation: 250 - 850 m.	0 N	Typical habitat not present on site; not detected during late fall surveys.
Calyptridium parryi var. hesseae Santa Cruz Mountains pussypaws	CRPR 1B.1	April - July	Sandy soils in chaparral, oak woodland, conifer forest. Elevation: 600 - 1,050 m.	N	No suitable habitat on site; not detected during late fall surveys.
Camissoniopsis hardhamiae Hardham's evening primrose	CRPR 1B.2	March - May	Sandy soil, limestone; disturbed or burned areas in oak woodland. Elevation: 60 - 600 m.	No	No suitable habitat on site; not detected during late fall surveys.
Castilleja densiflora subsp. obispoensis Obispo Indian paintbrush	CRPR 1B.2	March - June	Coastal grassland. Elevation: < 400 m.	No	Suitable habitat present on site; not detected during late fall surveys.



			PLANTS		
Scientific/Common Name	Listing Status ¹	Blooming Period ²	Habitat Type ²	Observed on Site?	Comments
Caulanthus lemmonii Lemmon's jewelflower	CRPR 1B.2	March - May	Valley and foothill grassland, chaparral, scrub. Elevation: 80 - 1,100 m.	No	Suitable habitat present on site; not detected during late fall surveys.
Ceanothus cuneatus var. fascicularis Lompoc ceanothus	CRPR 4.2	February - May	Sandy substrates in coastal chaparral. Elevation: < 275 m.	NO	No suitable habitat on site; not observed during appropriately timed surveys.
Chlorogalum purpureum var. purpureum Santa Lucia purple amole	Fed: Threatened CRPR 1B.1	May - June	Open woodland. Elevation: ± 300 m.	No	No suitable habitat on site; not detected during late fall surveys.
Chorizanthe douglasii Douglas's spineflower	CRPR 4.3	April - July	Sand or gravel. Elevation: 200 - 1,600 m.	No	No suitable habitat on site; not detected during late fall surveys.
Chorizanthe palmeri Palmer's spineflower	CRPR 4.2	May - August	Serpentine soil. Elevation: 60 - 700 m.	No	No suitable habitat on site; not detected during late fall surveys.
Chorizanthe rectispina Straight-awned spineflower	CRBR 1B.3	May - July	Sand or gravel. Elevation: 200 - 600 m.	No	No suitable habitat on site; not detected during late fall surveys.
Clinopodium mimuloides Monkey-flower savory	CRPR 4.2	June - October	Moist places, stream banks, chaparral, woodland. Elevation: 400 - 1,800 m.	No	No suitable habitat on site; not observed during appropriately timed surveys.



			PLANTS		
Scientific/Common Name	Listing Status ¹	Blooming Period ²	Habitat Type ²	Observed on Site?	Comments
Convolvulus simulans Small-flowered morning- glory	CRPR 4.2	April - June	Clay substrates, occasionally serpentine, annual grassland, coastal-sage scrub, chaparral. Elevation: 30 - 875 m.	NO	Suitable habitat present on site; not detected during late fall surveys.
Delphinium gypsophilum Gypsum-loving larkspur	CRPR 3.2	February - June	Slopes in grassland, open oak woodland. Elevation: 90 - 1,200 m.	NO	Suitable habitat present on site; not detected during late fall surveys.
Delphinium parryi subsp. blochmaniae Dune larkspur	CRPR 1B.2	April - May	Coastal chaparral, coastal dunes, sand. Elevation: < 200 m.	No	No suitable habitat on site; not detected during late fall surveys.
Delphinium umbraculorum Umbrella larkspur	CRPR 1B.3	April - June	Moist oak forest. Elevation: 400 - 1,600 m.	No	No suitable habitat on site; not detected during late fall surveys.
Entosthodon kochii Koch's cord moss	CRPR 1B.3	Year - round	Cismontane woodland, riverbanks on newly exposed soil. Elevation: 180 - 1,000 m.	No	No suitable habitat on site; not detected during late fall surveys.
Eriastrum luteum Yellow-flowered eriastrum	CRPR 1B.2	May - June	Drying slopes, sandy or gravelly soil, typically in association with chaparral or woodland. Elevation: < 1,000 m.	NO	No suitable habitat on site; not detected during late fall surveys.
Eriogonum elegans Elegant wild buckwheat	CRPR 4.3	May - November	Sand or gravel. Elevation 200 - 1,200 m.	No	No suitable habitat on site; not observed during appropriately timed surveys.



		Ŀ	PLANTS		
Scientific/Common Name	Listing Status ¹	Blooming Period ²	Habitat Type ²	Observed on Site?	Comments
Eriophyllum jepsonii Jepson's woolly sunflower	CRPR 4.3	April - June	Dry oak woodland. Elevation: 200 - 1,000 m.	N	No suitable habitat on site; not detected during late fall surveys.
Eschscholzia hypecoides San Benito poppy	CRPR 4.3	March - June	Grassy areas in woodland, chaparral. Elevation: 200 - 1,600 m.	N	No suitable habitat on site; not detected during late fall surveys.
Hesperevax caulescens Hogwallow starfish	CRPR 4.2	March - June	Drying shrink-swell clay of vernal pools, flats, and steep slopes; sometimes on serpentine. Elevation: < 500 m.	No	No suitable habitat on site; not detected during late fall surveys.
Horkelia cuneata var. puberula Mesa horkelia	CRPR 1B.1	March - July	Dry, sandy, coastal chaparral. Elevation: 70 - 870 m.	No	No suitable habitat on site; not detected during late fall surveys.
Horkelia cuneata var. sericea Kellogg's horkelia	CRPR 1B.1	April - August	Old dunes, coastal sand hills. Elevation: < 200 m.	No	No suitable habitat on site; not detected during late fall surveys.
Juncus luciensis Santa Lucia dwarf rush	CRPR 1B.2	April - August	Wet, sandy soils of seeps, meadows, vernal pools, streams, roadsides. Elevation: 300 - 1,900 m.	No	Suitable habitat present on site; not detected during late fall surveys.
Lepidium jaredii Jared's pepper grass	CRPR 1B.2	March - April	Alkali bottoms, slopes, washes, dry hillsides, in vertic clay, acidic, gypsiferous soil. Elevation: 500 - 700 m.	No	No suitable habitat on site; not detected during late fall surveys.



		-	PLANTS		
Scientific/Common Name	Listing Status ¹	Blooming Period ²	Habitat Type ²	Observed on Site?	Comments
Lessingia tenuis Spring lessingia	CRPR 4.3	ylul - yaM	Openings in chaparral, woodland. Elevation: 50 - 2,200 m.	N	No suitable habitat on site; not detected during late fall surveys.
Malacothamnus davidsonii Davidson's bush-mallow	CRPR 1B.2	ylul - yaM	Slopes, washes. Elevation: 500 - 700 m.	N	No suitable habitat on site; not detected during late fall surveys.
Malacothamnus jonesii Jones' bush-mallow	CPR 4.3		Open chaparral in foothill woodland. Elevation: 250 - 830 m.	N	No suitable habitat on site; not detected during late fall surveys.
Malacothrix saxatilis var. arachnoidea Carmel Valley malacothrix	CRPR 1B.2	May - October	Rocky, open banks, shale outcrops, cliff faces, coastal scrub, chaparral. Elevation: 25 - 900 m.	N	No suitable habitat on site; not detected during late fall surveys.
Meconella oregana Oregon meconella	CRPR 1B.1	March - May	Shaded canyons. Elevation: < 1,000 m.	N	No suitable habitat on site; not detected during late fall surveys.
Monolopia gracilens Woodland woollythreads	CRPR 1B.2	March - July	Serpentine grassland, open chaparral, oak woodland. Elevation: 100 - 1,200 m.	N	No suitable habitat on site; not detected during late fall surveys.
Navarretia fossalis Spreading navarretia	Fed: Threatened CRPR 1B.1	April - June	Vernal pools, ditches. Elevation: 30 - 1,300 m.	N	No suitable habitat on site; not detected during late fall surveys.



			PLANTS		
Scientific/Common Name	Listing Status ¹	Blooming Period ²	Habitat Type ²	Observed on Site?	Comments
Navarretia nigelliformis subsp. radians Shining navarretia	CRPR 1B.2	VluL - VaN	Vernal pools, clay depressions. Elevation: 150 - 1,000 m.	N	No suitable habitat on site; not detected during late fall surveys.
Navarretia prostrata Prostrate vernal pool navarretia	CRPR 1B.1	April - July	Alkaline floodplains, vernal pools. Elevation: < 700 m.	N	No suitable habitat on site; not detected during late fall surveys.
Nemacladus secundiflorus var. secundiflorus Large-flowered nemacladus	CRPR 4.3	April - May	Dry, gravelly slopes. Elevation: 200 - 2,000 m.	N	No suitable habitat on site; not detected during late fall surveys.
Plagiobothrys uncinatus Hooked popcornflower	CRPR 1B.2	April - May	Chaparral, canyon sides, and rocky outcrops;	N	No suitable habitat on site; not detected during late fall surveys.
Senecio astephanus San Gabriel ragwort	CRPR 4.3	April - June	Steep, rocky slopes in chaparral/ coastal sage scrub and oak woodland. Elevation: 400 - 1,500 m.	N	No suitable habitat on site; not detected during late fall surveys.
Stebbinsoseris decipiens Santa Cruz microseris	CRPR 1B.2	April - May	Open, sandy, shaly, or serpentine sites, coastal. Elevation: 10 - 500 m.	No	No suitable habitat on site; not detected during late fall surveys.
¹ Listing status obtained from CNPS Rare and Endangered Plant Inventory (CNPS 2016)	VPS Rare and Endangered	Plant Inventory (CN	JPS 2016).		

usuing status optained from CNPS Rare and Endangered Plant Inventory (CNPS 2016). ²Blooming period and habitat type obtained from Jepson eFlora (2016) and occasionally supplemented with information provided by CNPS (Jepson eFlora 2016, CNPS 2016).



			WILDLIFE		
Scientific/Common Name	Listing Status	Nesting/ Breeding Period	Habitat Type	Observed on Site?	Comments
Agelaius tricolor	State: CSC	February -	Needs nest sites near open, fresh	No	No suitable nesting habitat on
Tricolored blackbird		August	water, protected habitat (such as cattails or tall rushes), and		site; not observed during surveys.
			suitable feeding areas (pastures, rice fields, grassland, etc.).		
Anniella pulchra pulchra	State: CSC	March -	Sandy or loose loamy soils under	No	No suitable habitat on site.
California legless lizard		November	coastal scrub or oak trees. Soil moisture essential.		
Antrozous pallidus	State: CSC	October -	Deserts, grasslands, shrublands,	No	No suitable habitat on site;
Pallid bat		February	woodlands and forests. Most		may forage through project
			common in open, dry habitats		area.
			with rocky areas for roosting. May		
			roost in old buildings and bridges.		
Aquila chrysaetos	State: Fully Protected	January -	Open country in prairies, tundra,	No	Suitable habitat on site; not
Golden eagle		August	open coniferous forest, and		observed during surveys.
			barren areas, especially in hilly or		
			mountainous regions. Nests in		
			large, prominent trees in		
			woodland areas and on cliff		
			ledges.		



			WILDLIFE		
Scientific/Common Name	Listing Status	Nesting/ Breeding Period	Habitat Type	Observed on Site?	Comments
Ardea herodias Great blue heron	State: Sensitive	March - August	Saltwater and freshwater marshes, sloughs, riverbanks, ponds and lakes. May also forage in grasslands and agricultural fields. Nests high in trees or other raised locations.	No	No suitable nesting or foraging habitat on site; not observed during surveys.
Athene cunicularia Burrowing owl	State: CSC	March - July	Open, dry grasslands, often short grasses. Rely on ground burrowing animals for terrestrial habitat.	No	No suitable habitat on site; not observed during surveys.
Bombus crotchii Crotch bumble bee	Special Animal	Unknown	Inhabits open grassland and scrub habitats; nesting occurs underground. Feeds on Asclepias, Chaenactis, Lupinus, Medicago, Phacelia, and Salvia.	No	Typical habitat not present on site; not observed during surveys.
Branchinecta Iynchi Vernal pool fairy shrimp	Fed: Threatened	Rainy season	Vernal pools and depressions in grasslands.	No	No suitable habitat on site; not observed during surveys. Critical habitat present, but no Primary Constituent Elements observed.
Buteo regalis Ferruginous hawk	State: Watch List	February - August	Variety of nesting locations including rock outcrops, trees, and ground.	No	No suitable habitat on site; not observed during surveys.



			WILDLIFE		
Scientific/Common Name	Listing Status	Nesting/ Breeding Period	Habitat Type	Observed on Site?	Comments
Corynorhinus townsendii	State: CSC	November -	Mines, tunnels, buildings, human	No	No suitable habitat on site;
Townsend's big-eared bat		May	made structures. May use		not observed during surveys.
			different day and night roosts.		May forage through project
			Prefers mesic habitats. Extremely		area.
			sensitive to human disturbance.		
Actinemys marmorata	State: CSC	April -	Riparian areas such as ponds,	No	Marginally suitable habitat,
Western pond turtle		August	lakes, rivers, streams, creeks,		present only seasonally,
			marshes, and irrigation ditches		within the ephemeral
			with either a rocky or muddy		drainage.
			bottom. Prefers shallow pools		
			with logs or rocks for basking.		
			Can enter brackish or even		
			seawater.		
Eremophila alpestris actia	State: Watch List	March -	Open fields, short grass areas,	No	Suitable foraging habitat
California horned lark		August	fields, rangelands.		present, unlikely to nest on site
Falco columbarius	State: Watch List	April - July	Open country habitats including	No	No suitable nesting habitat on
Merlin			grasslands, seashores, sand dures,		site; not observed during
			marshlands, and steppes.		surveys.
Falco mexicanus	State: Watch List	February -	Primarily inhabits dry grasslands,	No	No suitable nesting habitat on
Prairie falcon		April	woodlands, savannahs, cultivated		site; however, observed
			fields, lake shores, and		during surveys.
			rangelands. Nests on cliffs,		
			canyons, and rock outcrops.		



			WILDLIFE		
Scientific/Common Name	Listing Status	Nesting/ Breeding Period	Habitat Type	Observed on Site?	Comments
Haliaeetus leucocephalus Bald eagle	State: Endangered Fully Protected	January - September	Forests adjacent to large bodies of water. Tolerant of human activity and are commonly spotted around dumps and fish processing plants.	No	Only limited suitability nesting habitat on site with no nearby aquatic resources.
Lasiurus cinereus Hoary bat	Special Animal	ylul - yaM	Have been found at both edge habits and heavily forested areas. Also have been observed in city parks.	No	No suitable habitat on site.
Neotoma macrotis luciana Monterey dusky-footed woodrat	State: CSC	February – November	Dense chaparral; hardwood, conifer, and mixed forests; and riparian woodlands. In most instances nests are constructed in inaccessible areas, such as thorny thickets, poison oak patches, or nettles.	No	No suitable habitat within the project area.
Perognathus inornatus Salinas pocket mouse	State: CSC	March - July	Grassland and desert scrub in Salinas Valley with friable soils.	ON	No suitable habitat on site.
Phrynosoma blainvillii Coast horned lizard	State: CSC	May - September	Frequents a wide variety of habitats, most common in lowlands along sandy washes with scattered low bushes.	No	Typical habitat not present on site; not observed during surveys.



			WILDLIFE		
Scientific/Common Name	Listing Status	Nesting/ Breeding Period	Habitat Type	Observed on Site?	Comments
Polyphylla nubila Atascadero June beetle	Special Animal	Early Summer - June	Known only from sand dunes in Atascadero and San Luis Obispo.	No	No suitable habitat on site; not observed during surveys.
Rana draytonii California red-legged frog	Fed: Threatened State: CSC	January - March	Lowlands and foothills in or near sources of deep water with dense, shrubby or emergent riparian vegetation.	No	Aquatic habitat is unlikely to support this species; not observed on site.
Setophaga petechia Yellow warbler	State: CSC (Nesting)	May - June	Breeds in wet, deciduous thickets, especially in willows; also in shrubby areas and old fields.	No	No suitable habitat on site.
Spea hammondii Western spadefoot toad	State: CSC	January - August	Seasonal/vernal pools in grassland, coastal scrub, chaparral, woodland habitat, and open areas with sandy or gravelly soils.	No	Marginally suitable habitat is present within the aquatic drainage; not observed on site.
Taricha torosa Coast range newt	State: CSC	December - May	Slow moving streams, ponds, and lakes with surrounding evergreen/ oak forests along coast.	No	No suitable habitat on site; not observed during surveys.
Taxidea taxus American badger	State: CSC	February - May	Needs friable soils in open ground with abundant food source such as California ground squirrels.	No	No suitable habitat on site; not observed during surveys.
Trimerotropis occulens Lompoc grasshopper	Special Animal	Unknown	Coastal lagoons, estuaries and salt marshes from Sonoma County south to San Diego County; able to withstand a wide range of salinity.	No	No suitable habitat on site; not observed during surveys.



WILDLIFE	Observed Comments on Site?	No Typical habitat not present on site; not observed during surveys.	No No suitable habitat on site; not observed during surveys. Within County mitigation area.
	Habitat Type	Dense, Iow, shrubby vegetation; riparian areas, brushy fields, second-growth forest or woodland, scrub oak, coastal chaparral, and mesquite brushlands; often near water in arid regions. Nests suspended from low branches of small trees or shrubs.	Open, annual grasslands with loose sandy soil.
	Nesting/ Breeding Period	March - September	December - July
	Listing Status	Fed: Endangered State: Endangered	Fed: Endangered State: Threatened
	Scientific/Common Name	Vireo bellii pusillus Least Bell's vireo	Vulpes macrotis mutica San Joaquin kit fox





APPENDIX E -Representative Site Photographs



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Photo 1. View east of gravel access road and proposed project area (October 28, 2016).



Photo 2. Active channel of the blue line drainage, view southeast (October 28, 2016).





Photo 3. Lone valley oak tree within the project area, view west from drainage channel (October 28, 2016).



Photo 4. Representative image of sparse vegetative growth within the survey area (October 28, 2016).





Photo 5. Potential SJKF den located in cemetery plot (October 28, 2016).



Photo 6. Pool located drownstream along blue line drainage at Airport Road (October 28, 2016).

Kit Fox Habitat Evaluation Form

(quidelines)

Cover Sheet

Project Name Paso Robles Airport Solar Project

Date January 19, 2017

Project

Location* Approximately 450 feet east of Airport Road and Adobe Road intersection, Paso Robles, California

*Include project vicinity map and project boundary on copy of U.S.G.S. 7.5 minute map (size may be reduced)

U.S.G.S. Quad Map Name

Paso Robles

Lat/Long or UTM coordinates (if available)

35 40 45.88" N, -120 28 13.63" W

Project Description: Solar facility development

Project Size <u>24.6</u> Acres Amount of Kit Fox Habitat Affected <u>24.6</u> Acres

Quantity of WHR Habitat Types Impacted (i.e. - 2 acres annual grassland, 3 acres blue oak woodland)

WHR type *Annual brome grassland	Approx. 24 _Acres
WHR type	Acres
WHR type	Acres
WHR type	Acres
Comments: *Remaining acreage (i.e., non-ve	getated areas) is ruderal/anthropogenic land.

Project area has been routinely disced/managed, including annual grassland areas, since at least 1994 (Google Earth).

Form Completed By: Terra Verde Environmental Consulting, LLC

Rev 3/02 G:envdiv/forms/kit fox habitat

San Joaquin Kit Fox Habitat Evaluation form

Is the project area within 10 miles of a recorded San Joaquin kit fox observation or within contiguous suitable habitat as defined in question 2 (A-E)

Yes - Continue with evaluation form No - Evaluation form/surveys are not necessary

1. Importance of the project area relative to Recovery Plan for Upland Species of the San Joaquin Valley, California (Williams et al., 1998)

A. Project would block or degrade an existing corridor linking core populations or isolate a subpopulation (20)

B. Project is within core population (15)

C. Project area is identified within satellite populations (12)

D. Project area is within a corridor linking satellite populations (10)

E. Project area is not within any of the previously described areas but is within known kit fox range (5)

2. Habitat characteristics of project area.

Annual grassland or saltbush scrub present >50% of site (15)

B. Grassland or saltbush scrub present but comprises<50% of project area (10)

C. Oak savannah present on >50% of site (8)

Fallow ag fields or grain/alfalfa crops (7)

E. Orchards/vineyards (5)

F. Intensively maintained row crops or suitable vegetation absent (0) WHR Habitat Type above states 24 acres of annual brome grassland. Page 5 of Bio Assessment references annual grassland that hasn't been disked recently.

3. Isolation of project area.

> A Project area surrounded by contiguous kit fox habitat as described in Question 2a-e (15)

B. Project area adjacent to at least 40 acres of contiguous habitat or part of an existing corridor (10)

C. Project area adjacent to <40 acres of habitat but linked by existing corridor (i.e., river, canal, aqueduct) (7)

• Project area surrounded by ag but less than 200 yards from habitat (5)

Vineyards and managed grassland are all considered kit fox habitat as provided in Question 2a-e above.



E. Project area completely isolated by row crops or development and is greater than 200 yards from potential habitat (0)

4. Potential for increased mortality as a result of project implementation. Mortality may come from direct (e.g., - construction related) or indirect (e.g., - vehicle strikes due to increases in post development traffic) sources.

A. Increased mortality likely (10) B. Unknown mortality effects (5) C. No long term effect on mortality (0)

- 5. Amount of potential kit fox habitat affected.
 - A. >320 acres (10)
 - B. 160 319 acres (7)
 - C. 80 159 acres (5)
 - D. 40 79 acres (3)
 - E.) < 40 acres (1)
- 6. Results of project implementation.
 - A. Project site will be permanently converted and will no longer support foxes (10)
 - Project area will be temporarily impacted but will require periodic disturbance for ongoing maintenance (7)
 - C. Project area will be temporarily impacted and no maintenance necessary (5)
 - D. Project will result in changes to agricultural crops (2)
 - E. No habitat impacts (0)
- 7. Project Shape

A) Large Block (10)

- B. Linear with > 40 foot right-of-way (5)
- C. Linear with < 40 foot right-of-way (3)
- 8. Have San Joaquin kit foxes been observed within 3 miles of the project area within the last 10 years?

Yes (10) No (0)

Scoring

- 1. Recovery importance 20
- 2. Habitat condition ^{× 15}

Revised 03-02

3.	Isolation	\$ 15
4.	Mortality	5
5.	Quantity of habitat impacted	1
6.	Project results	× 10
7.	Project shape	10
8.	Recent observations	0

TOTAL

55 76

Revised 03/02-lpd

Revised by CDFW Brandon Sanderson 1/24/2017



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alliplic

Halden Petersen Biologist

MATERIAL CULTURE CONSULTING

archaeology | paleontology | sustainability

CULTURAL AND PALEONTOLOGICAL ASSESSMENT: PASO ROBLES AIRPORT SOLAR PROJECT CITY OF PASO ROBLES, SAN LUIS OBISPO COUNTY, CALIFORNIA

Prepared on Behalf of: EPD Solutions, Inc. 2030 Main Street, Suite 1200 Irvine, CA 92614

Prepared for:

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Prepared By:

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> Material Culture Consulting 342 Cucamonga Avenue Claremont, California 91711 626-205-8279

December 7, 2016 Revised January 20, 2017

Material Culture Consulting Project Number: EPD2016010 Type of Study: Paleontological and Archaeological Resources Assessment Paleontological Localities within Area of Potential Impact: None Archaeological Sites within Area of Potential Impact: None Project Location: USGS 7.5' Topographic Quadrangle Paso Robles, Township 26 South, Range 12 East, Section 12, Mount Diablo Meridian Project Area: 26 acres Date of Field Survey: November 15, 2016 Key Words: Paleontology, Archaeology, CEQA, Paso Robles, San Luis Obispo County, Negative Survey, High Paleontological Sensitivity

MANAGEMENT SUMMARY

The following report describes the results of an archaeological and paleontological assessment conducted by Material Culture Consulting for the Paso Robles Airport Solar Project, City of Paso Robles, San Luis Obispo County, California. Material Culture Consulting conducted the present study in compliance with the California Environmental Quality Act (CEQA) and City of Paso Robles environmental guidelines, in order to assess the potential for significant impacts to cultural and paleontological resources as a result of the project. The investigation of the subject property included cultural and paleontological records searches, background research, and a pedestrian field survey of the 24.6-acre project area.

The records searches did not identify any previously known cultural resources or fossil localities within the project area. The paleontological formation present within the project area is identified as Quaternary alluvium (Pleistocene), transitioning to the highly sensitive Paso Robles Formation (Miocene through Pleistocene), both of which are well documented as containing significant fossil remains in the region. The project area is located adjacent to the Estrella Adobe Church (California Historical Landmark #542), and a previously recorded prehistoric archaeological site that was not relocated during the course of survey (P-40-000491). The boundary of these two resources are within 200 feet of the project area. There are several unmarked graves known to exist within the original boundaries of the cemetery associated with the church, and one known burial that lies outside of the boundary of the cemetery to the north (and outside of the project area). A creek passes between the cemetery and the project area, which likely served as a topographic boundary when the church was in use. However, there is still the potential of encountering unmarked human burials within the project area, particularly within the northwestern portion of the project site.

The pedestrian survey of the project area was conducted by Tria Belcourt, M.A., RPA, a cross trained archaeologist and paleontologist, on November 15, 2016. During the course of fieldwork, ground visibility was highly variable throughout the project area, ranging from excellent (95-100%) to very poor (0-5%). Portions of the property have been significantly disturbed through use as a tilled and plowed grain field in the recent past, however other portions of the property do not appear to have disturbed in the modern era. No cultural or paleontological resources were identified during the survey.

Based on the records searches, background research, and survey results, the project area is considered highly sensitive for paleontological resources, and moderately to highly sensitive for cultural resources. We recommend creating a cultural and paleontological monitoring plan, in order to ensure that no impacts to potentially significant resources occur. Cultural and paleontological monitoring are recommended during ground disturbing activities associated with the project, and will focus on project activities that reveal previously unexposed soil matrix and sediment (i.e. grading, trenching). Monitoring is not effective during activities where matrix is not visually exposed (i.e. pile-driving for installation of solar pylons).

A copy of this report will be permanently filed with the CCIC at University of California, Santa Barbara. All notes, photographs, correspondence and other materials related to this project are located at Material Culture Consulting, located in Claremont, California.

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INTRODUCTION

PURPOSE OF STUDY

Material Culture Consulting was retained to conduct a cultural and paleontological resources assessment of the 24.6acre Paso Robles Airport Solar Project. The purpose of this study is to identify any significant impacts that could occur as a result of the project implementation. Our team conducted cultural and paleontological record searches, archival research, a Native American Sacred Lands file search, coordination and information gathering with Native American tribes and individuals, and pedestrian field survey to identify visible cultural and paleontological resources within the Project Area.

This assessment was conducted pursuant to all applicable State and City regulations regarding cultural and paleontological resources, as well as guidelines established by the Society of Vertebrate Paleontology (SVP, 1995, 2010). According to these regulations and guidelines, if development of a project impacts significant cultural or paleontological resources, a plan must be developed to mitigate those impacts. This assessment documents the potential for encountering cultural and paleontological resources during development of this project, and makes recommendations on how to mitigate impacts to those resources.

PROJECT DESCRIPTION

The proposed Project is to construct a solar array within the 24.6-acre Project Area, located directly north of the Paso Robles Municipal Airport, at 5099 Propeller Drive, Paso Robles, California (Figures 1-3). Approximately 80% of the Project Area has been previously disturbed and recently tilled and plowed for wheat agriculture. Specifically, this project is located in Section 12 of the USGS 7.5-minute Paso Robles, California topographic map, Township 26 South, Range 12 East (Mt. Diablo Meridian).

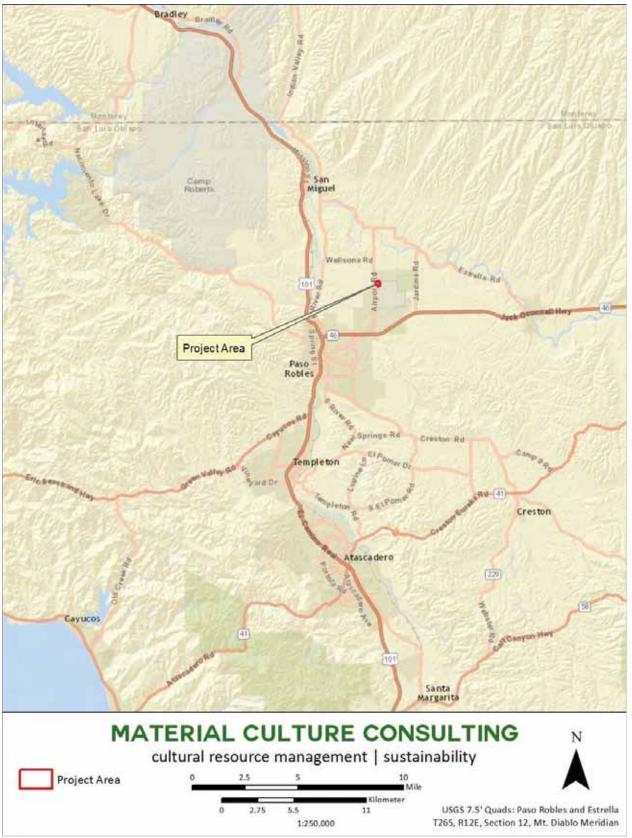
PROJECT PERSONNEL

Jennifer Kelly, M.S., a Qualified Professional Paleontologist, served as the Principal Investigator for the study. Ms. Kelly conducted the paleontological resource literature and map reviews, oversaw the field study, and prepared this report. Ms. Kelly has a M.Sc. in Geology from California State University, Long Beach. Ms. Kelly has over ten years of experience in paleontology and compliance in California (See Appendix A).

Tria Belcourt, M.A., Registered Professional Archaeologist and owner of Material Culture Consulting, served as the Project Manager for the study. Ms. Belcourt coordinated the records search, conducted the pedestrian survey, created the maps for the report and performed editorial review of this report. Ms. Belcourt has a M.A. in Anthropology from the University of Florida, a B.A. in Anthropology from the University of California at Los Angeles and is a cross-trained paleontologist, with over twelve years of experience in California archaeology and seven years of experience in California paleontology (See Appendix A).

Paso Robles Airport Solar – City **Exchibit B** Cultural and Paleontological Resources Assessment **B**

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Paso Robles Airport Solar – City **Example 1** Cultural and Paleontological Resource **Example 1**

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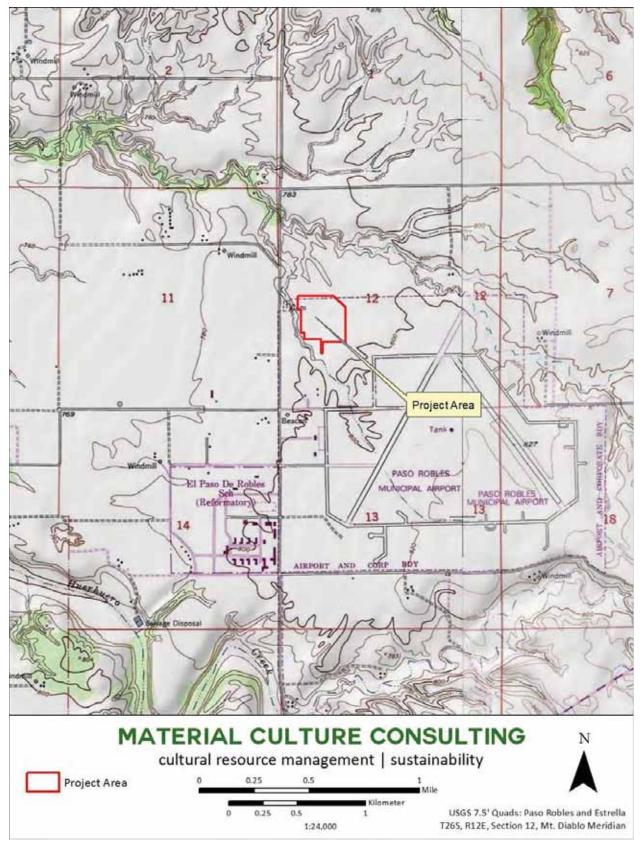


Figure 2. Project Area (depicted on Paso Robles and Estrella USGS 7.5 Minute Quadrangle)

Paso Robles Airport Solar – City **Exchibit B** Cultural and Paleontological Resource **Constitution**

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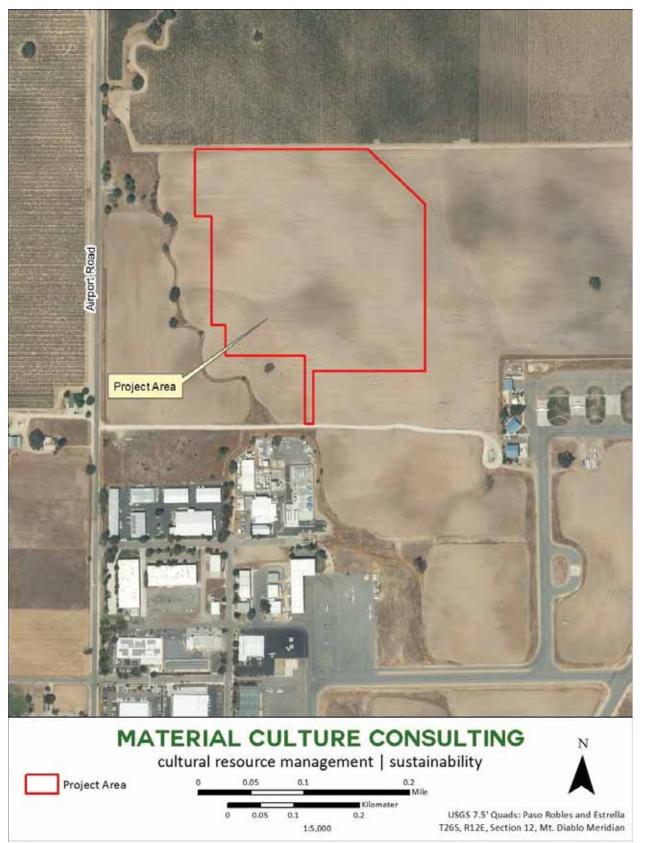


Figure 3. Paso Robles Solar Project Area (as depicted on aerial photograph)



REGULATORY ENVIRONMENT

Existing federal, state, and local regulations require the identification of archaeological and paleontological resources during the planning stage of new projects; include application review for projects that would potentially involve land disturbance; provide a project-level standard condition of approval that addresses unanticipated archaeological and/or paleontological discoveries; and provide requirements to develop specific mitigation measures if resources are encountered during any development activity. This project is subject to both state and local regulations, including CEQA and the City of Paso Robles General Plan Conservation Element.

CALIFORNIA ENVIRONMENTAL QUALITY ACT

CEQA declares that it is state policy to "take all action necessary to provide the people of this state with...historic environmental qualities." It further states that public or private projects financed or approved by the state are subject to environmental review by the state. All such projects, unless entitled to an exemption, may proceed only after this requirement has been satisfied. CEQA requires detailed studies that analyze the environmental effects of a proposed project. In the event that a project is determined to have a potential significant environmental effect, the act requires that alternative plans and mitigation measures be considered. CEQA includes historic and archaeological resources as integral features of the environment. If paleontological resources are identified as being within a proposed Project Area, the sponsoring agency must take those resources into consideration when evaluating Project impacts. The level of consideration may vary with the importance of the resource.

CEQA requires a lead agency to determine whether a Project may have a significant effect on historical resources. A historical resource is a resource listed in, or determined to be eligible for listing in, the California Register of Historical Resources (CRHR) (Section 21084.1), a resource included in a local register of historical resources (Section 15064.5(a)(2)), or any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant (Section 15064.5 (a)(3)). Public Resources Code (PRC) Section 5024.1, Section 15064.5 of the Guidelines, and Sections 21083.2 and 21084.1 of the Statutes of CEQA were used as the basic guidelines for the cultural resources study. PRC Section 5024.1 directs evaluation of historical resources to determine their eligibility for listing on the CRHR. The purpose of the register is to maintain listings of the state's historical resources and to indicate which properties are to be protected from substantial adverse change.

The criteria for listing resources on the CRHR were expressly developed to be in accordance with previously established criteria developed for listing on the NRHP, enumerated above, and require similar protection to what NHPA Section 106 mandates for historic properties. According to Public Resources Code (PRC) Section 5024.1(c)(1-4), a resource is considered historically significant if it meets at least one of the following criteria:

- 1. Associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States;
- 2. Associated with the lives of persons important to local, California or national history;
- 3. Embodies the distinctive characteristics of a type, period, region or method of construction or represents the work of a master or possesses high artistic values; or
- 4. Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California or the nation.

In addition to having significance, resources must have integrity for the period of significance. The period of significance is the date or span of time within which significant events transpired, or significant individuals made their important contributions. Integrity is the authenticity of a historical resource's physical identity as evidenced by the survival of characteristics or historic fabric that existed during the resource's period of significance.

Alterations to a resource or changes in its use over time may have historical, cultural, or architectural significance. Simply, resources must retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance. A resource that has lost its historic character or appearance may still have sufficient integrity for the California Register, if, under Criterion 4, it maintains the potential to yield significant scientific or historical information or specific data. Note that California Historical Landmarks with numbers 770 or higher are automatically included in the CRHR.

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Under CEQA, if an archeological site is not a significant "historical resource" but meets the definition of a "unique archaeological resource" as defined in PRC Section 21083.2, then it should be treated in accordance with the provisions of that section. A unique archaeological resource is defined in PRC Section 21083.2(g) as follows:

An archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- 1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
- 2. Has a special and particular quality such as being the oldest of its type or the best available example of its type.
- 3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Resources that neither meet any of these criteria for listing on the NRHP or CRHR nor qualify as a "unique archaeological resource" under CEQA PRC Section 21083.2 are viewed as not significant. Under CEQA, "A non-unique archaeological resource need be given no further consideration, other than the simple recording of its existence by the lead agency if it so elects" [PRC Section 21083.2(h)].

Impacts to historical resources that alter the characteristics that qualify the historical resource for listing on the CRHR are considered to be a significant effect (under CEQA). The impacts to a historical resource are considered significant, if the Project activities physically destroy or damage all or part of a resource, change the character of the use of the resource or physical feature within the setting of the resource which contribute to its significance, or introduce visual, atmospheric, or audible elements that diminish the integrity of significant features of the resource. If it can be demonstrated that a Project will cause damage to a unique archaeological resource, the lead agency may require reasonable efforts to be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. To the extent that they cannot be left undisturbed, mitigation measures are required (Section 21083.2 (a), (b), and (c)).

CALIFORNIA HISTORICAL LANDMARKS AND POINTS OF HISTORICAL INTEREST

Historical landmarks are sites, buildings, features, or events that are of statewide significance and have anthropological, cultural, military, political, architectural, economic, scientific or technical, religious, experimental, or other value. In order to be considered a California Historical Landmark, the landmark must meet at least one of the following criteria:

- 1. Associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States;
- 2. Associated with the lives of persons important to local, California, or national history;
- 3. Embodies the distinctive characteristics of a type, period, region, or method of construction; represents the work of a master; or possesses high artistic values;



4. Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

If a site is primarily of local or countywide interest, it may meet the criteria for the California Point of Historical Interest Program. Points of Historical Interest are sites, buildings, features, or events that are of local (city or county) significance and have anthropological, cultural, military, political, architectural, economic, scientific or technical, religious, experimental, or other value.

To be eligible for designation as a Point of Historical Interest, a resource must meet at least one of the following criteria:

- 1. The first, last, only, or most significant of its type in the local geographic region (city or county);
- 2. Associated with an individual or group having a profound influence on the history of the local area;
- 3. A prototype of, or an outstanding example of, a period, style, architectural movement or construction; or
- 4. One of the more notable works or the best surviving work in the local region of a pioneer architect, designer, or master builder.

Points of Historical Interest designated after December 1997 and recommended by the State Historical Resources Commission are also listed in the California Register. No historical resource may be designated as both a Landmark and a Point of Interest. If a Point of Interest is subsequently granted status as a Landmark, the Point of Interest designation will be retired.

PALEONTOLOGY

The State of California Public Resources Code (Chapter 1.7), Sections 5097.5 and 30244, includes additional state level requirements for the assessment and management of paleontological resources. These statutes require reasonable mitigation of adverse impacts to paleontological resources resulting from development on state lands, define the removal of paleontological "sites" or "features" from state lands as a misdemeanor, and prohibit the removal of any paleontological "site" or "feature" from State land without permission of the jurisdictional agency. These protections apply only to State of California land, and thus apply only to portions of the project, if any, which occur on State land.

As defined by Murphey and Daitch (2007): "Paleontology is a multidisciplinary science that combines elements of geology, biology, chemistry, and physics in an effort to understand the history of life on earth. Paleontological resources, or fossils, are the remains, imprints, or traces of once-living organisms preserved in rocks and sediments. These include mineralized, partially mineralized, or unmineralized bones and teeth, soft tissues, shells, wood, leaf impressions, footprints, burrows, and microscopic remains. Paleontological resources include not only fossils themselves, but also the associated rocks or organic matter and the physical characteristics of the fossils' associated sedimentary matrix.

The fossil record is the only evidence that life on earth has existed for more than 3.6 billion years. Fossils are considered non-renewable resources because the organisms they represent no longer exist. Thus, once destroyed, a fossil can never be replaced. Fossils are important scientific and educational resources because they are used to:

- 1. Study the phylogenetic relationships amongst extinct organisms, as well as their relationships to modern groups;
- 2. Elucidate the taphonomic, behavioral, temporal, and diagenetic pathways responsible for fossil preservation, including the biases inherent in the fossil record;
- 3. Reconstruct ancient environments, climate change, and paleoecological relationships;



- 4. Provide a measure of relative geologic dating that forms the basis for biochronology and biostratigraphy, and which is an independent and corroborating line of evidence for isotopic dating;
- 5. Study the geographic distribution of organisms and tectonic movements of land masses and ocean basins through time;
- 6. Study patterns and processes of evolution, extinction, and speciation; and
- 7. Identify past and potential future human-caused effects to global environments and climates."

Fossil resources vary widely in their relative abundance and distribution and not all are regarded as significant. Vertebrate fossils, whether preserved remains or track ways, are classed as significant by most state and federal agencies and professional groups (and are specifically protected under the California Public Resources Code). In some cases, fossils of plants or invertebrate animals are also considered significant and can provide important information about ancient local environments. According to BLM IM 2009-011 a "Significant Paleontological Resource" is defined as: Any paleontological resource that is considered to be of scientific interest, including most vertebrate fossil remains and traces, and certain rare or unusual invertebrate and plant fossils.

Assessment of significance is also subject to the California Environmental Quality Act (CEQA) criterion that the resource constitutes a "unique paleontological resource or site." A significant paleontological resource is considered to be of scientific interest if it is a rare or previously unknown species, it is of high quality and well-preserved, it preserves a previously unknown anatomical or other characteristic, provides new information about the history of life on earth, or has an identified educational or recreational value. Paleontological resources that may be considered not to have scientific significance include those that lack provenience or context, lack physical integrity due to decay or natural erosion, or that are overly redundant or are otherwise not useful for research. Vertebrate fossil remains and traces include bone, scales, scutes, skin impressions, burrows, tracks, tail drag marks, vertebrate coprolites (feces), gastroliths (stomach stones), or other physical evidence of past vertebrate life or activities (BLM, 2008).

The full significance of fossil specimens or fossil assemblages cannot be accurately predicted before they are collected, and in many cases, before they are prepared in the laboratory and compared with previously collected material. Pre-construction assessment of significance associated with an area or formation must be made based on previous finds, characteristics of the sediments, and other methods that can be used to determine paleoenvironmental conditions. A separate issue is the potential of a given geographic area or geologic unit to preserve fossils. Information that can contribute to assessment of this potential includes:

- 1. The existence of known fossil localities or documented absence of fossils nearby and in the same geologic unit (e.g. "Formation" or one of its subunits);
- 2. Observation of fossils within the project vicinity;
- 3. The nature of sedimentary deposits in the area of interest, compared with those of similar deposits known elsewhere (size of particles, clasts and sedimentary structures conducive or non-conducive to fossil inclusion) that may favor or disfavor inclusion of fossils; and
- 4. Sedimentology details, and known geologic history, of the sedimentary unit of interest in terms of the environments in which the sediments were deposited, and assessment of the favorability of those environments for the probable preservation of fossils.

As so defined, significant paleontological resources are determined to be fossils or assemblages of fossils that are unique, unusual, rare, uncommon, or diagnostically important. Significant fossils can include remains of large to very small aquatic and terrestrial vertebrates or remains of plants and animals previously not represented in certain portions of the stratigraphy. Assemblages of fossils that might aid stratigraphic correlation, particularly



those offering data for the interpretation of tectonic events, geomorphologic evolution, and paleoclimatology are also critically important (Scott and Springer 2003; Scott et al. 2004).

CITY OF PASO ROBLES GENERAL PLAN

The City of Paso Roble's General Plan contains language pertaining to cultural resources in the Conservation Element (City of Paso Robles 2003). The City of Paso Robles General Plan does not specifically mention paleontological resources. Within the Conservation Element, Goal C-6 strives to preserve/protect important historic and archeological resources. Policy C-6A encourages the preservation and restoration of historic buildings in the downtown and the Vine Street neighborhood of the city, which does not apply to this project area. Policy C-6B strives to preserve/protect "unique archaeological resources" as defined by the California Environmental Quality Act (CEQA). By implementation of Action Item 1 (the only action item under this heading), the city will meet this policy and goal for the Paso Robles Airport Solar Project:

• Action Item 1. Require the preparation of archaeological studies and/or preliminary evaluation reports for new developments that are subject to CEQA and the site could potentially contain a "unique archaeological resource." Incorporate mitigation measures identified by such studies into the development..



BACKGROUND

ENVIRONMENTAL SETTING

The vegetation in this part of Paso Robles is primarily oak savanna and grassland interspersed with chaparral. On the project parcel, feral oats (Avena sp.), barley (Hordeum sp.), other annual grasses and invasive species such as yellow star thistle (Cirsium solstitialis), bull thistle (Cirsium vulgare) and bur-clover (Medicago sp.) have taken over following the abandonment of agriculture. Oaks (Quercus spp.), were observed during the survey, along with jimson weed (Datura stramonium), blue curl (Trichostema lanatum), bush morning glory (Convolvulus cneorum), and turkey mullein (Croton setigerus). Animal species commonly occurring in the area (but not seen) include blacktail deer (Odocoileus hemionus), coyote (Canis latrans), ground squirrel (Spermophilus beecheyi), western gray squirrel (Sciurus griseus), pocket gopher (Thomomys sp.), California scrub jay (Aphelocoma coerulescens), red-tailed hawk (Buteo jamaicensis), turkey vulture (Cathartes aura), acorn woodpecker (Melanerpes formicuvorus) Several crows (Corvus brachyrhynchos), Western meadowlark (Sturnella neglecta), and valley quail (Lophortyx californicus) were observed during survey.

PALEONTOLOGY

The Paso Robles and Estrella quadrangles lie within the Coast Ranges geomorphic province (Norris and Webb, 1976). The Coast Ranges stretch from the Oregon Border to approximately the Santa Ynez River, and are divided into two subprovinces- the ranges north of San Francisco Bay, and the ranges to the south of the bay. In the Project area, the Diablo Ranges to the north and east and the Santa Lucia Range to the south and west create the wide, open, and fertile valleys that characterize this important grape growing region. Gravels were deposited in this area starting in the late Miocene during mountain-building processes, which lie unconformably across older sediments. In this area, those deposits are called the Paso Robles Formation. The Project area is mapped entirely as Quaternary older alluvium deposits by T.W. Dibblee in 1971 (Figure 4). As discussed in the records search, in this area it is unclear which unit has produced fossils. Near the Project, fossils of mammoth, horse, fish, tortoise, and lizard have been found in either the older alluvium or the Paso Robles Formation (LACM, Appendix B).

Quaternary older alluvium (Qoa) is a Pleistocene aged (1 million to 10,000 years ago) deposit. These units consist of river and stream derived sediments. The sediments are comprised of unsorted clay to pebble-sized clasts that are oxidized to a reddish hue, poorly indurated, and may contain reworked material from metamorphic and igneous geologic units nearby (Dibblee 2004). This unit has the potential to produce significant paleontological resources, including remains of mammoth, mastodon, camel, horse, and other Pleistocene fossils (Jefferson 1991). This unit has a high sensitivity as defined by SVP standards.

Paso Robles Formation (QTp) is a Miocene-Pleistocene aged unit (dating to as early as 2.8 million years ago) consisting of poorly consolidated coarse sand and gravels, formed by deposition in floodplains and small lakes during uplift, forming extensive low-relief surfaces that almost cover the Coast Ranges in some areas (Norris and Webb, 1976; Dibblee 1971, 2004). This unit has a high sensitivity as defined by SVP standards.

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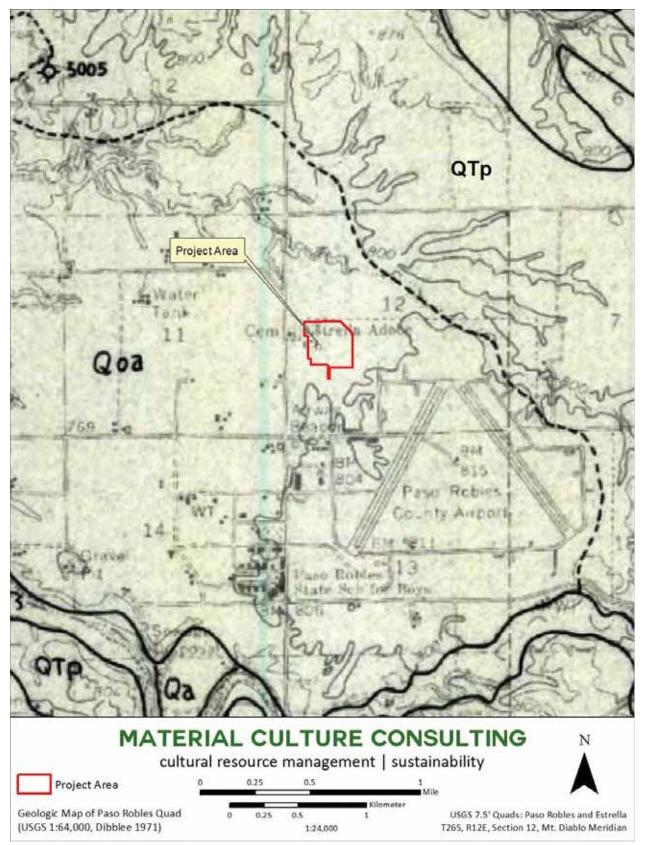


Figure 4. Geologic Map of Project Vicinity (from Dibblee 1971)



PREHISTORIC SETTING

Most researchers agree that the earliest occupation for the Paso Robles area dates to the early Holocene (11,000 to 8,000 years ago). Archaeological evidence indicates that San Luis Obispo County was occupied as early as 9,000 years ago, as indicated by dates from excavations at Diablo Canyon (Greenwood 1972), Edna Valley (Fitzgerald 2000) and Paso Robles (Stevens et al. 2004). Because of the small amount of archaeological work that has occurred in the interior south coast ranges, a definitive cultural historical sequence has not yet been constructed for this region. Olsen and Payen (1969) constructed a cultural chronology for the eastern portion of the region based on materials from San Luis, Little Panoche, and Los Banos Reservoirs. The dating of individual cultural units was later revised by Mikkelsen and Hildebrandt (1990) based on the Olivella bead typology developed by Bennyhoff and Hughes (1987). The following discussion on culture history incorporates these changes and extends the Millingstone period back to 10,000 years before present (B.P.). Important cultural changes are discussed within the framework of four time periods based on Central Valley (e.g. Bennyhoff and Hughes 1987) and Central Coast (Jones 1993) sequences: Paleoindian Period (2,600 – 1,000 BP – 8,500 BP), Millingstone Period (8,500 – 5,500 BP), Early Period (5,500 – 2,600 BP), Middle Period (2,600 – 1,000 BP), Middle/Late Transition Period (1,000 - 750 BP), and Late Period (750 - historic contact). The characteristics of each of these periods are manifested primarily in changes in the material culture and elaboration of the social structure.

Evidence for Millingstone period occupations in this region is sparse, amounting to materials recovered from two widely-separated sites. The first of these sites is the Grayson site (MER-94) in the San Luis Reservoir area (Olsen and Payen 1969). In the deepest levels of this multi-component deposit was a suite of artifacts including millingstones, handstones, small shaped mortars and pestles, simple flaked stone tools, perforated stone pendants, and beads made of whole Olivella shells. The second site with a possible Millingstone period occupation in the interior south coast ranges is the Salinas River Crossing Site (SLO-1756) reported by Fitzgerald (1997). Although the association between artifacts and dates at this site is not straightforward, it also yielded an artifact assemblage similar to Millingstone Horizon sites in southern California and produced a date of 7,000 B.P. Other important Millingstone period sites are found nearer the coast in the Edna Valley south of San Luis Obispo (Fitzgerald 2000), and at Diablo Canyon (Greenwood 1972).

Along the coast and in interior areas, the Early period is marked by the appearance of mortars and pestles and contracting-stemmed projectile points (Olsen and Payen 1969; Jones 1993). Other artifacts found with Early period occupations are also found in Millingstone period sites including Olivella class L beads, large side-notched projectile points, and milling slabs and hand stones. Greater numbers of sites are known from the Early period, possibly signaling a population increase.

The Middle period is well represented at sites along the central coast and increasingly in interior regions as well. The types of artifacts found in Middle period occupations are similar to those from the Early period although a larger number of bone implements and bead types are known (Olsen and Payen 1969; Jones and Waugh 1995). Projectile points tend to be contracting-stemmed types with large side-notched and square-stemmed points apparently no longer used. Excavations at Fort Hunter Liggett have shown that Middle period occupations in that area resemble those found along the coast (Jones and Haney 1997).

Late period assemblages from the interior south coast ranges are distinguished by a suite of new bead types, small side-notched and triangular arrow points, and hopper mortars as well as many artifact types found in earlier periods (Olsen and Payen 1969). At Fort Hunter Liggett, Late period occupations also included small arrow points, new bead types, as well as bedrock mortars and unshaped pestles (Jones 2000; Haney et al. 2002). On the whole, the Late period assemblages from a wide area of the central coast and interior regions appear superficially similar, but this was probably a time of continued cultural differentiation due to higher population densities.



There is clearly still a great deal to learn about the prehistory of the interior south coast ranges, but comparisons between findings in coastal areas and the relatively smaller amount of work conducted locally show that a similar set of cultural changes probably occurred in both areas. What is not well understood at this point is how people living in the interior interacted with those living along the coast. Also, it is not known how the development of complex societies further south in the Santa Barbara Channel area may have affected groups living to the north. The presence of marine shell beads in interior areas and obsidian obtained from the desert east in coastal areas is testimony to the wide-ranging trade and social networks that existed from an early date. Future work may yet uncover archaeological evidence necessary to understand these and other important issues that have only recently begun to be explored in this region.

ETHNOGRAPHY

At the time of European contact, the surrounding region was probably occupied by the Salinan people, although some confusion still exists among experts as to the dividing line between the Chumash and the Salinan in this area. The Salinan were bordered by the Esselen and Costanoan to the north and the Chumash to the south (Kroeber 1925). Unfortunately, very little of substance is known about Salinan culture because of the early influence of the missions and the remoteness of their territory, meaning their traditional lifeways were altered early on and few people outside of the mission system were present to record what remained after secularization (Mason 1912). The Salinan, like nearly all of California's original inhabitants, practiced a hunting and gathering economy. Major plant foods included acorns and a variety of small seeds while major animal foods included a diverse assortment of terrestrial mammals, marine and freshwater fish, shellfish, birds, as well as reptiles and insects. It is unclear to what extent people living inland ventured to the coast and vice versa, but it is likely that people were mobile enough to take advantage of plant and animal foods when and where they occurred. If this were the case, then diets probably varied from season to season, and from year to year, depending on what was available at any one time.

Records of the mission fathers suggest there were two, or possibly three different Salinan groups occupying different core territories and speaking slightly different versions of the same language (Mason 1912). The most well documented division was between northern and southern peoples, the Antoniño and Migueliño respectively. The third Playano (or "beach people") division is mentioned in mission registers, but has not been substantiated by linguistic or other evidence. Individuals recorded as Playano speakers may have in fact been northern Chumash. Given the rugged nature of the southern Big Sur coast, it is possible that contiguous groups (e.g. Chumash, Esselen) shared the coastal area with the Salinan on a seasonal basis, although possibly not always amicably (Mason 1912).

HISTORICAL SETTING

European contact in the San Luis Obispo County region may have begun as early as 1587 with the visit of Pedro de Unamuno to Morro Bay, although some scholars have questioned this based on the ambiguity of Unamano's descriptions (Mathes 1968). A visit in 1595 by Sebastian Rodriguez Cermeño is better documented (Jones et al. 1994:11). The earliest well-documented descriptions come from accounts by members of Gaspar de Portola's land expedition, which passed through the region in 1769 (Squibb 1984). No large villages, such as those seen along the Santa Barbara channel, were reported by early travelers in the San Luis Obispo region. Permanent Spanish settlement of the region began with the founding of Mission San Antonia de Padua (near King City) in 1771 and San Luis Obispo de Tolosa (in San Luis Obispo) in 1772. Twenty-five years later, Mission San Miguel Archangel was founded in the heart of southern Salinan territory. The mission properties were extensive and included an outlying rancho station near present day Paso Robles. As elsewhere, induction into the missions had a devastating effect on the local inhabitants, requiring them to live and work at the mission and abandon their former lifeways. Under the guidance of the mission fathers, the natives were instructed in farming methods, including the production of wheat, beans and various kinds of fruit. The earliest farming was intended to foster independence; thus making the import of supplies up from Mexico unnecessary.

The inauguration of Spanish colonization brought about major and devastating changes in the aboriginal society, due primarily to the introduction of European diseases. The consequent high mortality rate, and the pressure of overwhelming social change, decimated the population. By 1805, most native villages had been abandoned, and the populace had either fled or moved into the mission system (Gibson 1983). The natives who had survived the Spanish colonization period, went on to build and staff the ranchos of the Mexican and American periods which followed. By the beginning of the 20 Century, the Chumash and Salinan had been integrated into American society (Gibson 1983 and 1991).

In 1822, Mexico attained independence of Spain and California became a Mexican territory. The Secularization Act, passed by the Mexican congress in 1833, provided for the immediate break-up of the missions and the transfer of mission lands to settlers and Indians. Work toward this end began in 1834 under Governor Figueroa. Grants were made to individuals by the governor on the recommendation of the local alcalde of the Mission. During the years from 1840 to 1846, a series of land grants were made from the lands of Mission San Miguel by the governors of Mexican California.

The project area was a portion of the Rancho 17,774+ acre Rancho Santa Ysabel, granted on May 12, 1844 by Mexican Governor Manuel Micheltorena to Francisco Arce (Ohles 1997: 104-110). In 1848 at the end of the Mexican war, California was ceded to the United States, and admitted to the Union is 1850. All grants were then subject to validation under United States laws. Based on the quality of the soil and general accessibility, a Board of Equalization in San Luis Obispo considered the parcel to be a Third Class Mexican Land Grant Ranchero. The United States Land Commission issued a patent on the parcel on May 21, 1866.

In 1878, a San Miguel Mission administrator, Don Innocenti Garcia, related to one Thomas Savage that Arce had sold the land to Don Francisco Rico (Temple 1974); however, no other record of this transaction has been located (Ohles 1997:110). Ownership had passed to W. V. Huntington by 1886. The West Coast Land Company was incorporated on March 27, 1886. Their immediate objective was to purchase and develop 64,000 acres of land for resale. The land was comprised of the ranchos Santa Ysabel, El Paso de Robles, Eureka, and the unsold portion of Huer Huero. The purchase was based upon the expectation that the Southern Pacific Railroad would build a coastal line between San Francisco and Los Angeles through San Luis Obispo County (Nicholson 1980).

The 26,000 acre rancho El Paso de Los Robles, granted May 12, 1844 to Pedro Navarez by Mexican Governor Manuel Micheltorena was located on the western side of the Salinas River. A patent was obtained July 20, 1866 by Petronillo Rios, but prior to the patent, the parcel was sold in two separate transactions, first to Daniel and James Blackburn on September 21, 1858. The second portion was sold July 9, 1861 to Lazarus Godchaux. They immediately began making improvements to the hot sulphur springs which had been used by local inhabitants for generations. By the 1870s, the Paso Robles Hot Springs was a well-known destination for people seeking the famous curative powers of the springs. With the coming of the Southern Pacific Railroad in 1886, a town plan for Paso Robles, on the western side of the Salinas River, was commissioned and was completed by 1887. Throughout the later part of the nineteenth and most of the twentieth century, the economy of the Paso Robles region was largely agricultural. Cattle ranches, dairies, almond and other fruit orchards, and large tracts devoted to dry land grain production comprised the rural landscape.



Estrella

Estrella was the name given to a Mexican Land Grant held by Mission San Miguel in 1844. Fed by the Salinas and Estrella Rivers, it remained wide open and unsettled until the 1870s when farmers began to homestead on the government owned lands. They raised sheep and cattle, and grew barley and wheat. In 1880, forty families supported a school, church, butcher shop, grocery, candy store, two blacksmiths, and a mercantile in Estrella town, surveyed by Joseph Moody. The town nearly vanished after a prolonged drought in the 1880s and 1890s and when the railroad between San Miguel and the San Joaquin Valley never materialized. The first post office in Estrella was established on July 8, 1886, across the street from the Fortney General Store. The first postmaster was Wilbur J. Sherman, and would later be operated by Mr. and Mrs. Simpson (Figure 5).



Figure 5. Estrella Post Office (Paso Robles Historical Society)

Children who lived in the Estrella area attended the Pleasant Valley School, which was ¼ mile north of the townsite (Figure 6). Founded in 1884, the schoolhouse itself was not constructed until 1908. It is known as the longest running one-room schoolhouse in the county. A new structure was constructed in 1994 to serve grades kindergarten through eighth grade. Pleasant Valley Community Foundation maintains the historic schoolhouse today.



Figure 6. Pleasant Valley School (Paso Robles Historical Society)

The project area is located directly adjacent to the Estrella Adobe Church. By 1877, a few Methodist families were meeting at the schoolhouse pastored by circuit-riding preachers of the 300-mile Cambria Circuit. Led by John Fortney who settled there in 1862, Francis Stovall, John Marden, William Guffey, Joseph Moody and Dwight Reynolds began making bricks and hauling lumber from San Luis Obispo. Built free of debt, the church building was dedicated in 1882 and completed in 1885. Estrella Adobe Church was the first Protestant church in the North San Luis Obispo County, seating 100 people. When the Methodists moved from Estrella to Paso Robles, a group of Mennonites held services at the adobe from 1898 to 1903. After that, the building was left to deteriorate (Figure 7).



Figure 7. Estrella Adobe Church, prior to restoration (Paso Robles Historical Society)





Figure 8. Present-day Estrella Adobe (November 15, 2016)

The cemetery associated with the church holds 43 known and marked graves, as well as many unmarked graves. Many of the graves are those of children lost in the devastating diphtheria epidemic of 1884-1885. A list of 20 individuals buried in unmarked graves was located at the historical archives of the Paso Robles Historical Society, although it is noted that some individuals (at least three) were initially buried at Estrella cemetery and were later moved to Paso Robles Cemetery due to poor road conditions, presumably at the time of death. At least three burials are noted as being located outside of the cemetery to the northwest.

With the onset of World War II, Paso Robles became home to a Marine Corps Air Station. An article in the Paso Robles Press on August 27, 1942, announced the plan to build what would be known as the Naval Auxiliary Air Station, Paso Robles, just six miles northeast of the City. Doudell Construction Company, San Jose, broke ground on September 3, 1942 with the arrival of 2000 construction workers. Two new 4700' runways, along with 43 buildings that included housing, administration, and storage facilities were completed by April 8, 1943. On that day, the Navy handed over control of the Air Station to the Army Air Forces, deciding that stations in the San Joaquin Valley were more favorable. The Air Station became the Estrella Army Air Field, and would be used for night flight training. By December 1943, over 1500 military personnel were stationed both at Estrella, and at Sherwood Field, the Navy's auxiliary airfield southeast of Paso Robles (Figure 9). On October 15, 1944, the airfield was deactivated, and in August 1947 the 966.8 acres was transferred to the County of San Luis Obispo, with the stipulation that it be used as a public airport. An additional 90 acres was transferred to the State of California in August 1948, with buildings on that parcel to be used for a boys' school. In 1973, the County sold the property to the City of Paso Robles for \$1, and the air base officially became the Paso Robles Municipal Airport.



Figure 9. Estrella Airfield Mechanics (Paso Robles Historical Society)

Agriculture has continued to be the mainstay of the region up to the present, with increasing emphasis on viticulture and wine-making. The proliferation of wineries in the last 25 years has led to tourism once again becoming a major component of the local economy.

METHODS

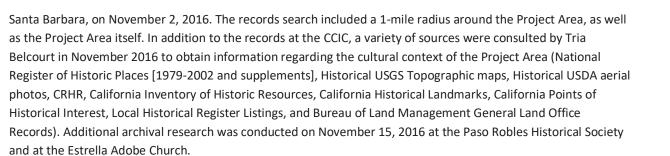
PALEONTOLOGICAL RESOURCES LITERATURE REVIEW

The paleontological literature review included an examination of geologic maps of the project area and a review of relevant geological and paleontological literature. The literature review is the initial step in determining the potential for significant project impacts to paleontological resources. This effort identifies which geologic units are present within the project area, and any fossils that have been recovered from those geologic units in the region. As geologic units may extend over large geographic areas and contain similar lithologies and fossils, the literature review includes areas well beyond the project area. The results of this literature review include an overview of the geology of the project areas and a discussion of the paleontological sensitivity (or potential) of the geologic units within the project area.

The purpose of a locality search is to establish the status and extent of previously recorded paleontological resources within and adjacent to the study area for a given project. In November 2016, a locality search was conducted through the Natural History Museum of Los Angeles, California. This search identified any vertebrate localities in the LACM's records that exist near the project area in the same or similar deposits.

CULTURAL RESOURCES LITERATURE REVIEW

An initial search for archaeological and historical records was completed by staff of the Central Coast Information Center (CCIC) of the California Historical Resources Inventory System (CHRIS), located at University of California,



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NATIVE AMERICAN OUTREACH AND BACKGROUND RESEARCH

A sacred lands record search was requested by Material Culture Consulting from the Native American Heritage Commission (NAHC) on November 1, 2016. The Commission responded on November 9, 2016, requesting that two Native American tribes be contacted for further information regarding the general Project vicinity. Material Culture Consulting subsequently sent letters to the two Native American contacts on November 10, 2016, requesting any information related to cultural resources or heritage sites within or adjacent to the Project Area. Additional attempts at contact by email and phone call were made on November 17 and November 24, 2016. Material Culture Consulting did not conduct formal consultation as per AB52 or SB18 with the Native American representatives.

FIELD SURVEY

The cultural resources survey stage is important in a project's environmental assessment phase to verify the exact location of each identified cultural resource, the condition or integrity of the resource, and the proximity of the resource to areas of cultural resources sensitivity. The purpose of a paleontological field survey is to note the sediments in the project area, relocate any known paleontological localities, and identify any unrecorded paleontological resources exposed on the surface of a project area. In this way, impacts to existing, unrecorded cultural or paleontological material may be mitigated prior to the beginning of ground-disturbing activities and portions of the project area that are more likely to contain these resources may be identified.

On November 15, 2016, Material Culture Consulting Owner and Principal, Tria Belcourt, M.A., a cross-trained archaeologist and paleontologist, conducted a pedestrian survey of the project area. Special attention was paid to any graded areas and to rodent burrows that offered a better view of the underlying sediment and potential unearthed cultural or paleontological resources. All undeveloped ground surface areas within the ground disturbance portion of the Project Area were examined for fossils and artifacts (e.g., flaked stone tools, tool-making debris, stone milling tools or fire-affected rock), soil discoloration that might indicate the presence of a cultural midden, soil depressions and features indicative of the former presence of structures or buildings (e.g., postholes, foundations), or historic-era debris (e.g., metal, glass, ceramics). Existing ground disturbances (e.g., cutbanks, ditches, animal burrows, etc.) were visually inspected. Representative photographs were taken of the entire project area and a photographic log was maintained.

RESULTS

PALEONTOLOGICAL LITERATURE REVIEW

The record search results from the LACM (McLeod 2016, Appendix B) do not indicate any fossils have been found directly within the Project area, nor within 1 mile of the Project, however, the museum does have record of



localities nearby from sedimentary deposits similar to those that occur in the proposed project area, either at the surface or at depth.

Surface deposits in the entire proposed project area consist of older Quaternary alluvial fan deposits, derived from the slightly more elevated terrain to the east and south, primarily via the drainage that forms the western border. These sedimentary deposits typically do not contain significant vertebrate fossils in the very uppermost layers, but at relatively shallow depth they may well contain significant vertebrate fossils. The closest fossil vertebrate locality from these deposits is LACM 5791, west-southwest of the proposed project area on the east side of the Salinas River south of Huerhuero Creek, that produced fossil specimens of mammoth, *Mammuthus*, as well as horse, *Equus occidentalis*, and bison, *Bison antiquus*, published in the scientific literature by G.T. Jefferson *et al.* (1992. Pleistocene terrestrial vertebrates from near Point San Luis, and other localities in San Luis Obispo County, California. Bulletin of the Southern California Academy of Sciences, 91(1:26-38.).

At depth, there may be older deposits of the Pleistocene Paso Robles Formation, and it is sometimes unclear whether vertebrate fossil localities in the vicinity are from the older Quaternary Alluvium or from the Paso Robles Formation. The museum's closest vertebrate fossil locality that might be from either deposit is LACM 4964, southeast of the proposed project area east of Paso Robles in a tributary of Dry Canyon Creek, that produced fossil specimens of stickleback, Gasterosteus, tortoise, Geochelone, and horse, Equidae. To the northwest of the proposed project area, along the Salinas River about one mile south of San Miguel, our locality LACM 5939 produced fossil specimens of horse, Equus. South-southwest of the proposed project area, on the western side of the Salinas River just north of the intersection of Highway 101 and State Road 46, our vertebrate fossil locality 6215 produced fossil specimens of lizard, Lacertilia, and mammoth, Mammuthus, from ten feet below the surface.

CULTURAL RESOURCES RECORDS SEARCH

The records search indicates seven cultural resources investigations have been completed previously within a 1mile radius of the Project Area (Table 1), one of which consists of an Environmental Impact Report (EIR) (SL-1643). The EIR includes a cultural resources records search of the Project Area, however, pedestrian survey was not conducted as part of that project's efforts. The results of the CHRIS records search further indicates while there are no previously recorded cultural resources within the project area, the Estrella Adobe Church and Cemetery, California Historical Landmark #542 and one archaeological site (P-40-000491) are located directly adjacent to the western boundary of the project area. The site record for P-40-000491 notes a temporary campsite directly east of the church, and west of the creek. The campsite is described by Van Worlhof (1969) as being comprised of "shell fragments, mainly of Pismo or Washington clam, a few spalls of chert, and thermal fractured stones". Results from other sources consulted are presented in Table 2. The records search letter response from CCIC is provided as Appendix B.

Author	Report	Title	Year	Proximity to
	No.			Project Area
Hoover, R.	SL-00484	Cultural Resources Evaluation, El Paso de Robles School	1985	Within 1 mile
Engineering-	SL-01643	Draft Hazardous Waste Management Plan, Environmental Impact	1988	Within
Science, Inc.		Report		Project Area
Parker, B.	SL-02838	3100 Improvements , Los Robles Camp, Dozer Storage Building	1995	Within 1 mile
Parker, Ben	SL-04016	CDF Project Review Report For Archaeological and Historical	2000	Within 1 mile
		Resources, Alamo CMP		

Table 1. Cultural Resource Investigations within 1-Mile of the Project Area

Author	Report	Title	Year	Proximity to
	No.			Project Area
Martin,	SL-04026	Cultural Resources Study for the Proposed California Department of	2000	Within 1 mile
Thomas		Forestry and Fire Protection Air Attack Base Facility Replacement,		
		Paso Robles, San Luis Obispo		
		County		
Singer, Clay	SL-06002	Cultural Resources Survey and Impact Assessment for a +/-230 acre	2007	Within 1 mile
		Property at 5151 Jardine Road in the City of Paso Robles, San Luis		
		Obispo County, California [APN 025-441-041/044/045].		
Conway,	SL-06170	An Archaeological Surface Survey at the Paso Robles Airport, San	2008	Within 1 mile
Thor		Luis Obispo County, California		

OTHER SOURCES

In addition to the records at the CCIC, a variety of sources were consulted by Tria Belcourt in November 2016 to obtain information regarding the cultural context of the Project Area (Table 2).

Table 2. Additional Sources Consulted for the Project

Source	Results
National Register of Historic Places (1979-2002 & supplements)	Negative
Historical United States Geological Survey topographic maps (USGS 2012)	Negative, no development in project vicinity
Historical United States Department of Agriculture aerial photos	Negative; adjacent properties were agricultural fields
California Register of Historical Resources (1992-2010)	Negative
California Inventory of Historic Resources (1976-2010)	Negative
California Historical Landmarks (1995 & supplements to 2010)	Negative
California Points of Historical Interest (1992 to 2010)	Negative
Local Historical Register Listings	Negative
Bureau of Land Management General Land Office Records	Negative

NATIVE AMERICAN OUTREACH AND BACKGROUND RESEARCH

As of January 19, 2017, no group or individual has responded to our requests for information. Material Culture Consulting did not conduct consultation with the Native American representatives as per SB18 or AB52. All written NAHC and Native American correspondence materials are provided as Appendix D.

Name/Affiliation	Date and Method of 1 st	Date and Method of 2 nd	Results/Comments	
	Contact Attempt	Contact Attempt		
Patti Dunton, Tribal	November 14, 2016 -	November 21 and 28, 2016 –	No response as of	
Administrator Salinan	Mailed letter to	Left phone message at	January 19, 2017	
Tribe of Monterey, San	address provided by	number provided by NAHC.		
Luis Obispo Counties	NAHC			
Karen White,	November 14, 2016 -	November 21 and 28, 2016 –	No response as of	
Chairperson, Xolon-	Mailed letter to	Left phone message at	January 19, 2017	
Salinan Tribe	address provided by	number provided by NAHC		
	NAHC			

Table 3. Native American Contact Log

FIELD SURVEY

Tria Belcourt, M.A., RPA, cross-trained archaeologist and paleontologist, conducted the survey of the proposed Project Area on November 15, 2016. Ground visibility varied throughout the Project Area ranging from 95-100% in areas of cleared vegetation, to less than 5% where vegetation was extremely dense (see Figure 10). The entire parcel is somewhat disturbed, due to use of the parcel for agriculture in the past (Figures 11-14). A seasonal wash/creek traverses the landscape to the northwest of the project area, which is also visible in aerial photos (Figure 3). No cultural or paleontological materials were identified or collected during the survey. The area comprising the archaeological site (P-40-000491), while originally recorded outside the project area (Figure 10), was investigated. This resource was not relocated. The visual observation of the exposed surficial sediments is consistent with the Paso Robles Formation, coarse sands and some gravels, with areas of well-indurated, grey to light brown sands.

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Figure 10. Cultural Resources Results – Approximate Location of P-40-000491 and Surface Visibility





Figure 11. Project Area Overview towards South



Figure 12. Project Overview view towards Southeast





Figure 13. Sediments within Project Area. Gravels and Coarse Sands Consistent with the Paso Robles Formation.



Figure 14. View towards East showing agricultural plowing.



Figure 15. View West towards Estrella Adobe and Cemetery, demonstrating proximity to Project Area.



CONCLUSIONS AND RECOMMENDATIONS

CULTURAL RESOURCES

The Project Area is considered to have a moderate to high sensitivity for the presence of prehistoric or historical archaeological deposits or features. Although no resources were observed during the course of survey of the Project Area, the close proximity of the Estrella Adobe church and cemetery, and the previously recorded archaeological site on the eastern bank of the creek, and immediately west of the project area boundaries, indicate that the area was utilized by Native Americans and early European settlers and homesteaders. In order to mitigate potential adverse impacts to nonrenewable cultural resources, as required by State and City regulations, we recommend the following procedures:

- A trained and qualified archaeological monitor should perform cultural resources monitoring of any ground disturbing activities associated with the Project that have the potential to impact cultural resources (i.e. grading, trenching). Monitoring is not effective during activities where soil matrix is not visually exposed (i.e. pile-driving for installation of solar pylons). The monitor will have the ability to redirect construction activities to ensure avoidance of significant impacts to cultural resources.
- During the initial vegetation removal and grading up to five feet below current ground surface of the site, we recommend full time cultural resources monitoring. The project archaeologist, in coordination with the City of Paso Robles, may re-evaluate the necessity for monitoring after the initial five feet of excavations have been completed.
- In the event that these resources are inadvertently discovered during ground-disturbing activities, work
 must be halted within 50 feet of the find until it can be evaluated by a qualified archaeologist.
 Construction activities could continue in other areas. If the discovery proves to be significant, additional
 work, such as data recovery excavation or fossil recovery, may be warranted and would be discussed in
 consultation with the appropriate regulatory agency(ies).
- Any potentially significant artifacts, sites or features observed shall be collected and recorded in conjunction with best management practices and professional standards.
- Any cultural items recovered during mitigation should be deposited in an accredited and permanent scientific institution for the benefit of current and future generations.
- A report documenting the results of the monitoring efforts, including any data recovery activities and the significance of any cultural resources will be prepared and submitted to the appropriate City and County personnel.
- Procedures of conduct following the discovery of human remains on non-federal lands have been mandated by California Health and Safety Code §7050.5, PRC §5097.98 and the California Code of Regulations (CCR) §15064.5(e). According to the provisions in CEQA, should human remains be encountered, all work in the immediate vicinity of the burial must cease, and any necessary steps to insure the integrity of the immediate area must be taken. The Orange County Coroner will be immediately notified. The Coroner must then determine whether the remains are Native American. If the Coroner determines the remains are Native American, the Coroner has 24 hours to notify the NAHC, who will, in turn, notify the person they identify as the most likely descendent (MLD) of any human remains. Further actions will be determined, in part, by the desires of the MLD. The MLD has 48 hours to make recommendations regarding the disposition of the remains following notification from the NAHC of the discovery. If the MLD does not make recommendations within 48 hours, the owner shall, with appropriate dignity, reinter the remains in an area of the property secure from further disturbance. Alternatively, if the owner does not accept the MLD's recommendations, the owner or the descendent may request mediation by the NAHC.



PALEONTOLOGICAL RESOURCES

No significant paleontological resources were identified within the project area during the locality search or field survey. However, the records search results indicate that significant fossils have been found in similar and adjacent geologic formations in the area, and may be found at an unknown depth within the project boundaries. In order to mitigate potential adverse impacts to nonrenewable paleontological resources, as required by State and County regulations, we recommend the following procedures:

- A trained and qualified paleontological monitor should perform paleontological monitoring of any ground disturbing activities associated with the Project that have the potential to impact paleontological resources (i.e. grading, trenching). Monitoring is not effective during activities where sediment is not visually exposed (i.e. pile-driving for installation of solar pylons). The monitor will have the ability to redirect construction activities to ensure avoidance of significant impacts to paleontological resources.
- The project paleontologist may re-evaluate the necessity for paleontological monitoring after 50% or greater of the excavations have been completed.
- Any potentially significant fossils observed shall be collected and recorded in conjunction with best management practices and SVP professional standards.
- Any fossils recovered during mitigation should be deposited in an accredited and permanent scientific institution for the benefit of current and future generations.
- A report documenting the results of the monitoring, including any salvage activities and the significance of any fossils will be prepared and submitted to the appropriate City and County personnel.

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Appendix A

Qualifications

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Tria Belcourt, M.A., RPA Owner and Principal

Tria is a qualified environmental project manager and Registered Professional Archaeologist, with twelve years of professional experience in the consulting industry. She is a recognized NEPA and CEQA regulatory expert and is highly regarded as an excellent writer of legally defensible technical documents, plans and reports. She is listed on statewide and regional BLM CRUPs and has held multiple ARPA permits in various regions for work on federal lands such as National Parks, National Forests, and National Monuments. Regional experience includes California, Nevada, the Great Basin, and the Southeastern United States. Sector experience includes: in-depth expertise with California publicly regulated utilities, renewable energy generators, transportation (rail, road and air), and private development.

Education:

- 2014 Graduate Certificate in Environmental Management of Military Lands, Colorado State University
- 2010 Professional Certification in CEQA/NEPA, ICF International Corporation
- 2009 M.A. in Anthropology, University of Florida Gainesville, Florida Professional Certification in GIS
- 2006 B.A. in Anthropology, Magna Cum Laude, University of California, Los Angeles, California

Utility Sector Experience

Southern California Edison (SCE) Projects and Programs

Tehachapi Renewable Transmission Project, Segments 1-3 and Segments 6-11, Kern, Los Angeles and Orange County, CA; 2009 - Present. Tria provided service to this project over seven years in multiple roles – archaeological/paleontological field monitor, project coordinator, in-house consultant at SCE, and principal investigator. She provided regulatory oversight and project management regarding cultural and paleontological resource management for all segments of TRTP. Developed and implemented internal cultural and paleontological resource management programs based on the mitigation measures in the Final Environmental Impact Report/Environmental Impact Statement (FEIR/EIS) for TRTP, and for the existing Special Use Permits and Record of Decision for TRTP, issued by the Angeles National Forest (ANF). Oversaw preparation of the Historic Properties Treatment Plans, fieldwork and technical report preparation for two large-scale Phase III Data Recovery excavations on Angeles National Forest, and provided final review of all paleontological monitoring reports. Coordinated with ANF archaeologists on discovery and management of previously unknown cultural resources identified during construction. Provided environmental analyses and clearance documentation on over 100 project modifications during construction without delay to project. Maintained the cultural resources geodatabase TRTP and coordinated regularly with the project GIS team.

Eldorado Ivanpah Transmission Project – In-house Consultant for Archaeology; San Bernardino County, California and Clark County, Nevada; 2010-2012. Belcourt provided regulatory oversight and project management regarding cultural and paleontological resource management. She developed environmental compliance training to inform and guide construction activities and major capital project teams. She also developed and implemented internal cultural resource management programs based on the mitigation measures in the FEIR/EIS. Tria coordinated with BLM archaeologists on discovery and management of previously unknown cultural resources discovered during construction. She provided environmental analyses and clearance



documentation on over 20 project modifications during construction without delay to project. Developed the cultural resources geodatabase for EITP and coordinated regularly with the project GIS team.

Coolwater Lugo Transmission Project — Environmental Project Manager; San Bernardino County, California; 2014 – Present. Belcourt provided oversight of all project management on CWLTP: tracking and reporting efforts of subconsultants (Pacific Legacy, Paleo Solutions and Urbana Preservation and Planning), maintaining project schedule and timely submittal of project deliverables to agency reviewers. Serves as communication facilitator between SCE and BLM/CPUC agency reviewers.

On-Call and Emergency Projects – Archaeological Principal Investigator and Project Manager; throughout California, 2013 – Present. Belcourt provides oversight of all task orders and project management of on-call task orders involving cultural resource desktop reviews, records searches and field reviews for deteriorated poles, system upgrades, initial studies to support capital projects, and monitoring support to replace facilities due to natural disasters. This high-volume program includes preparing and submitting budgets, managing support staff and overseeing work, tracking and reporting efforts, maintaining project schedules, and preparing technical reports and GIS datasets for submittal to prime contractor (SWCA).

Silver State South Substation, Southern California Edison, Clark County, NV; 2010-2012. Provided regulatory oversight and project management regarding cultural and paleontological resource management during project licensing and scoping. Identified potential impacts to cultural and paleontological resources, developing appropriate mitigation measures in preparation for and projecting alternative conclusions. Lead In-house Consultant Archaeologist at Southern California Edison. 2012-2013

Small Capital Projects – Archaeological Principal Investigator and Program Manager; throughout California, 2014 – Present. Belcourt provides oversight of all task orders and project management of task orders involving cultural resources for this contract with ICF. This includes preparing and submitting budgets, managing support staff and overseeing work, tracking and reporting efforts, maintaining project schedule, and preparing technical reports and GIS datasets for submittal to prime contractor. Task orders – Kelly Cutover (Extends throughout the city of Daggett and surrounding area), Colton Substation (located in Colton), Utah 12kV (Located at Joshua Tree National Park).

Pacific Gas and Electric Company Programs (PG&E)

NERC Alert Program – Archaeological Principal Investigator; throughout California; 2015 – Present. Belcourt provides oversight of all task orders and project management of on-call task orders involving cultural resource desktop reviews, records searches and field reviews for the PG&E NERC Alert program – PG&E's program for addressing GO 95 discrepancies. Tasks include tracking and reporting efforts, maintaining project schedule, and timely submittal of data to prime contractor (Arcadis).

In-Line Inspections and Pigging Program – Archaeological Principal Investigator and Program Manager, throughout California, 2016-Present. Belcourt provides oversight of all task orders and project management of on-call task orders involving cultural resource desktop reviews, records searches and field reviews for the PG&E NERC Alert program: tracking and reporting efforts, maintaining project schedule, and timely submittal of data to prime contractor (Parsons).

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Jennifer Kelly, M.S. Paleontological Project Manager and Field Director

Jennifer has experience in all aspects of paleontology. She has extensive experience with monitoring, salvage, fieldwork, project management, and report writing, as well as volunteer experience from the La Brea Tar Pits/Page Museum and the Cooper Center of Orange County (Paleontology department) and field experience as a Staff Geologist for Leighton Geotechnical. Her expertise is Geology, and she has her M.S. in Geological Sciences, emphasis in Geochemistry. Jennifer has taught lab courses in paleontology and general geology, and also assisted with field mapping classes. Jennifer is HAZWOPER 40-hour certified and a registered Orange County paleontologist. She has co-authored more than 60 paleontological compliance documents, including PRMPs, EIR, EIS, PEA, final monitoring reports, survey reports, and other compliance documents, in compliance with NEPA, CEQA, Caltrans and city and county laws, ordinances, regulations, and statutes.

Education:

- 2012 M.S. Geology, California State University, Long Beach
- 2005 B.S., Geology (preliminary work for entry to M.S. Geology Program), California State University, Long Beach
- 2004 B.A., Theater Arts, California State University, Long Beach

Professional Experience

Tehachapi Renewable Transmission Project (TRTP) — **Southern California Edison (LSA), Kern County, Los Angeles County, San Bernardino County, California, Assistant PM/Research Specialist**, Ms. Kelly has conducted and led surveys along this project's right of way. She additionally has been in charge of scheduling monitoring crews during grading in areas of paleontological sensitivity, managing and reviewing log sheets, and tracking data that is incorporated to final reports. Ms. Kelly played a valuable role with scheduling for the project's needs. She has monitored, surveyed, and reported on all paleontological facets of this project as the Lead Paleontological Monitor for segment 3B and 4-11. She has co-authored more than 10 of the compliance reports for this project. She has also performed monitoring on every segment of this Project.

OC Access Road Grading, Southern California Edison, Orange and Riverside County, California, Assistant PM/Research Specialist., Ms. Kelly assisted in documentation for the cultural resources portion, which include information regarding the location and condition of archaeological and paleontological sites recorded at or near the access roads, and recommends impact avoidance measures for future years in implementing the Protocol for 73 known archaeological sitesThis required extensive coordination with Orange County Fire Authority grading department, SCE's O&M (operations and maintenance), and Orange County Parks. Trimble units were used for the documentation before and after grading of access roads. Communication played a key role when strategizing which locations were being graded where and when. The company came in under budget because of Jennifer's efficiency and ability to coordinate and schedule.

SDG&E Laguna Niguel Reliability Project, Laguna Niguel, Orange County, California, Assistant PM/Research Specialist Jennifer performed initial research for this Project, and co-authored the final report on the monitoring efforts for this project in the Capistrano Formation.

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SDG&E Camp Pendleton Project, Counties of San Diego and Orange. On-Call Paleontological Services (2009-2012), Assistant PM/Research Specialist, Ms. Kelly was a key facet in report production and research which enabled her firm to perform all survey and monitoring work required on Camp Pendleton for CEQA/NEPA check list assessments requested from SDG&E. Ms. Kelly was cleared from the Department of Defense in order to conduct work on the base. Site assessments and monitoring include all work related to: future location of power poles and towers, water control features, trenching and subsurface excavations, access roads, grading impacts to develop substations and other facilities, work pads, staging yards, and gas pipelines.

Holy Sepulchre Cemetery Expansion Project, Diocese of Orange, Santa Ana, Orange County, California, Assistant PM/Research Specialist Jennifer assisted with scheduling monitoring for this project, and was the coauthor for the final report, as well as performing all project-related research. The project consisted of grading and leveling several new areas for expansion of the Holy Sepulchre Cemetery, including portions that lie in paleontologically sensitive rock formations and had the potential to produce fossils.

UC Irvine Alumni Center Project, Irvine, Orange County, California, Assistant PM/Research Specialist She performed all monitoring scheduling and coordination duties, as well as research and writing for the final report and the initial monitoring guidelines. This project was a high-visibility construction project for a new alumni center on the grounds of UC Irvine, in a paleontologically sensitive area.

Peters Canyon County Park Restrooms Project, Orange County, California, Assistant PM/Research Specialist Ms. Kelly performed all paleontological monitoring scheduling and coordination duties, as well as research and writing for the final paleontological resources letter report. This project involved the leveling of a pad and significant trenching through paleontologically sensitive soils in order to install a new restroom at the northern end of this park.

El Casco System-Transmission Line — Southern California Edison, Riverside County, California, Paleontological Field Technician, Ms. Kelly performed monitoring, salvaged small and large fossils, Screen washed and sorted fossils. Ms. Kelly aided in the processing of microfossils collected from bulk sampling of fossil bearing sediment, and documenting stratigraphic locations of fossil bearing units. This project was incompliance with both CEQA and the CPUC.

Paleontological Mitigation Plans (PMP) for Caltrans Cherry/Citrus Ave I-10 interchange Project — PCR/Caltrans, San Bernardino, California, Assistant PM/Research Specialist Jennifer Kelly conducted all aspects of surveying, and literature searches for both projects.

UHS Temecula Medical Center— Turner Construction, Temecula, Riverside County, California, Assistant PM/Research Specialist. She was in charge of day to day scheduling and occasional monitoring as well as writing the final report.

Ocotillo Wind Express Project — **ASPEN, Imperial County, California, Assistant PM/Research Specialist**, Ms. Kelly was responsible for managing and collecting all field forms and data that was electronically mailed daily, and incorporating these forms in the final DEIR/EIS Report. She conducted all technical research and compiled both geological and compliance documentation into the final report that was then incorporated into the EIR/EIS.

Manzana Wind Express Project, Kern County, California, Assistant PM/Research Specialist Ms. Kelly assisted in writing the Paleontological Mitigation Monitoring Resource Plan, which allowed her to develop a key role in presenting environmental training programs to construction workers and other environmental compliance monitors. She co-authored the final paleontological monitoring report. The Manzana Wind Energy Project site was found to have the potential for scientifically significant paleontological resources that could be impacted by construction-related ground disturbance. Project construction consisted of the installation of 107 to 300 wind

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energy turbines, aligned along approximately 26 rows, on the 6,275-acre proposed site. She co-authored the final paleontological mitigation report in compliance with CEQA and Kern County guidelines.

Pacific Wind Express Project, Kern County, California, Assistant PM/Research Specialist Ms. Kelly assisted in writing the Paleontological Mitigation Monitoring Resource Plan, which allowed her to develop a key role in presenting environmental training programs to construction workers and other environmental compliance monitors. She co-authored the final paleontological mitigation report.

Cadiz Ground Water Project, ESA, San Bernardino County, California, Assistant PM/Research Specialist, Ms. Kelly conducted all research and data collection for the Cadiz Groundwater Conservation and Storage Project, located in eastern San Bernardino County, California in order for Paleo Solutions personnel to complete a DEIR section on paleontological resources. The project included the pipeline corridor but not the Well Field Area and Spreading Basins. Based on the results of the analysis, mitigation measures were developed and are designed to reduce potential adverse impacts to paleontological resources as a result of proposed Project construction to a less than significant level. Only one Project alternative was analyzed for impacts on paleontological resources). The paleontological analysis for the Cadiz Project is a requirement of the California Environmental Quality Act (CEQA).

South of Kramer, Southern California Edison (SCE), Hesperia to Barstow, San Bernardino, County, California, Assistant PM/Research Specialist Ms. Kelly assisted in overseeing portions of project management and compliance surveying, which includes surveying from Hesperia to Barstow, CA. All portions of the Proposed Project are located within San Bernardino County, California. The investigation is for a Proponent's Environmental Assessment (PEA). This project is still active and survey results are being finalized. Ms. Kelly coauthored the final survey report for this Project. A BLM Permit was authorized for the survey.

Pacific Gas and Electric (PG&E), Jefferson to Stanford No. 2 60 kV Feasibility Project, San Mateo County, California, Assistant PM/Research Specialist Jennifer assisted with the preparation of the paleontological resources review and paleontological inventory report (PIR) and Proponent's Environmental Assessment (PEA) for this project. Several potential routes were assessed for this project, and the feasibility and paleontological potential was determined for this project. The report and PIR were prepared according to CEQA guidelines.

Pacific Gas and Electric (PG&E), Line 300A/MP 147.7 and 180.8 Projects, San Bernardino County, California, Assistant PM/Research Specialist Ms. Kelly assisted in the preparation of mitigation recommendations and a paleontological inventory report for this ongoing project, as well as assisting with and scheduling planned surveys on BLM and United States Marine Corps lands.

Pacific Gas and Electric (PG&E), Line 107/131 Projects, Alameda County, California, Assistant PM/Research **Specialist** Jennifer assisted with the preparation of mitigation recommendations and a paleontological inventory report for this ongoing project, as well as managing planned surveys of proposed pipeline locations.

Southern California Edison (SCE) Valley South Subtransmission Line Project, Riverside County, California, Assistant PM/Research Specialist Ms. Kelly assisted with scheduling and oversight for coordination of all surveying, preparation of compliance and environmental documentation for this project, including three proposed alternatives, and co-wrote the final PEA and survey reports, utilizing CEQA and Riverside County paleontological guidelines.

Southern California Edison (SCE) San Joaquin Cross Valley Loop Project, Tulare County, California, Assistant PM/Research Specialist Ms. Kelly assisted with the coordination of all surveying, preparation of compliance and

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environmental documentation for this project, and co-authored the final Paleontological Monitoring Plan for this project in Tulare County utilizing CEQA requirements.

Southern California Edison (SCE) Devore Substation Project, San Bernardino County, California, Assistant PM/Research Specialist Ms. Kelly assisted with preparation of compliance and environmental documentation including a paleontological inventory and geologic map research for this project utilizing CEQA and Riverside County paleontological guidelines.

Southern California Edison (SCE) Horsetown Substation Project, Riverside County, California, Assistant PM/Research Specialist Ms. Kelly assisted with preparation of compliance and environmental documentation including a paleontological inventory and geologic map research for this project utilizing CEQA and Riverside County paleontological guidelines.

Grid Reliability and Maintenance, Southern California Edison, Seawolf, Argonaut, Thresher and Argonaut 12 kV Distribution Lines, City of Temecula, Riverside County, California, Assistant PM/Research Specialist Ms. Kelly assisted with preparation of compliance and environmental documentation including co-authoring the final paleontological report for this project in Riverside County. This report was prepared under CEQA and Riverside County guidelines.

SDG&E Wind Interconnection Project (WIP), San Diego County, California, Assistant PM/Research Specialist Jennifer co-authored the paleontological mitigation portion of the Environmental Impact Report (EIR) for this project, utilizing both San Diego County and CEQA guidelines for paleontological resources.

West of Devers Transmission Line Project— Southern California Edison, Riverside County, California, Assistant PM/Research Specialist Jennifer has assisted with all project management and paleontological related services. This includes proper BLM authorization and permitting to conduct surveying and a research design for field reconnaissance related to PEA, EIS/EIR documentation for the proposed transmission line. She assisted with managing documentation with laws relating to paleontological resources, among which are CEQA and NEPA compliance.

LADWP-Scattergood Project, County of Los Angeles. On-Call Paleontological Services (2012-2015), Assistant PM/Research Specialist Ms. Kelly assisted with all project aspects associated to paleontology. She co-authored a paleontological mitigation monitoring plan and assisted in scheduling the monitoring the Scattergood Olympic Line 1 Project, completed the final mitigation document for trench exploration, and has performed extensive monitoring for this ongoing project.

Other Experience:

Leighton Geotechnical (2006):

Staff Geologist- Performed initial geotechnical assessments via trenching and logging in Hemet, California.

California State University Long Beach (2005-2008):

Teaching Assistant- Taught general geology and paleontology labs, including designing daily lectures, tests and quizzes to ensure competent knowledge of geological and paleontological concepts.

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Appendix B

Paleontological Resources

Records Search Results

Natural History Museum of Los Angeles County 900 Exposition Boulevard Los Angeles, CA 90007

tel 213.763.DINO www.nhm.org

Vertebrate Paleontology Section Telephone: (213) 763-3325

e-mail: smcleod@nhm.org

21 November 2016

Material Culture Consulting 342 Cucamonga Avenue Claremont, CA 91711

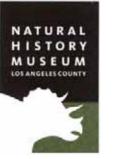
Attn: Tria Belcourt, Owner and Principal Archaeologist

re: Paleontological resources for the proposed Paso Robles vicinity Project, in the City of Paso Robles, San Luis Obispo County, project area

Dear Tria:

I have conducted a thorough check of our paleontology collection records for the locality and specimen data for the proposed Paso Robles vicinity Project, in the City of Paso Robles, San Luis Obispo County, project area as outlined on the portion of the Paso Robles USGS topographic quadrangle map that you sent to me via e-mail on 1 November 2016. We do not have any vertebrate fossil localities that lie directly within the proposed project area boundaries, but we do have localities nearby from sedimentary deposits similar to those that occur in the proposed project area, either at the surface or at depth.

Surface deposits in the entire proposed project area consist of older Quaternary alluvial fan deposits, derived from the slightly more elevated terrain to the east and south, primarily via the drainage that forms the western border. These sedimentary deposits typically do not contain significant vertebrate fossils in the very uppermost layers, but at relatively shallow depth they may well contain significant vertebrate fossils. Our closest fossil vertebrate locality from these deposits is LACM 5791, west-southwest of the proposed project area on the east side of the Salinas River south of Huerhuero Creek, that produced fossil specimens of mammoth, *Mammuthus*, as well as horse, *Equus occidentalis*, and bison, *Bison antiquus*, published in the scientific literature by G.T. Jefferson *et al.* (1992. Pleistocene terrestrial vertebrates from near Point San Luis, and other localities in San Luis Obispo County, California. Bulletin of the Southern California Academy of Sciences, 91(1):26-38.).



At depth there may be older deposits of the Pleistocene Paso Robles Formation, and it is sometimes unclear whether vertebrate fossil localities in the vicinity are from the older Quaternary Alluvium or from the Paso Robles Formation. Our closest vertebrate fossil locality that might be from either deposit is LACM 4964, southeast of the proposed project area east of Paso Robles in a tributary of Dry Canyon Creek, that produced fossil specimens of stickleback, *Gasterosteus*, tortoise, *Geochelone*, and horse, Equidae. To the northwest of the proposed project area, along the Salinas River about one mile south of San Miguel, our locality LACM 5939 produced fossil specimens of horse, *Equus*. South-southwest of the proposed project area, on the western side of the Salinas River just north of the intersection of Highway 101 and State Road 46, our vertebrate fossil locality 6215 produced fossil specimens of lizard, Lacertilia, and mammoth, *Mammuthus*, from ten feet below the surface.

Very shallow excavations in the older Quaternary Alluvium exposed throughout the proposed project area probably will not uncover significant vertebrate fossil remains. Deeper excavations in the proposed project area that extend down into older Quaternary deposits or deposits of the Paso Robles Formation, however, may well encounter significant vertebrate fossils. Any substantial excavations in the proposed project area, therefore, should be monitored closely to quickly and professionally recover any fossil remains discovered while not impeding development. Also, sediment samples should be collected and processed to determine the small fossil potential in the proposed project area. Any fossils recovered during mitigation should be deposited in an accredited and permanent scientific institution for the benefit of current and future generations.

This records search covers only the vertebrate paleontology records of the Natural History Museum of Los Angeles County. It is not intended to be a thorough paleontological survey of the proposed project area covering other institutional records, a literature survey, or any potential on-site survey.

Sincerely,

Summel A. Mi Lood

Samuel A. McLeod, Ph.D. Vertebrate Paleontology

enclosure: invoice

Appendix C

Cultural Resources

Records Search Results

California Archaeological Inventory



SAN LUIS OBISPO AND SANTA BARBARA COUNTIES

Central Coast Information Center

Department of Anthropology University of California, Santa Barbara Santa Barbara, CA 93106-3210 (805) 893-2474 FAX (805) 893-8707 centralcoastinfo@gmail.com

11/2/2016

Tria Belcourt Material Culture Consulting 342 Cucamonga Avenue Claremont, CA 91711

Re: Paso Robles Airport Solar

The Central Coast Information Center received your record search request for the project area referenced above, located on the Paso Robles and Estrella USGS 7.5' quad(s). The following reflects the results of the records search for the project area and a 1-mile radius:

As indicated on the data request form, the locations of reports and resources are provided in the following format: E custom GIS maps is shapefiles in hand-drawn maps

Resources within project area:	None.
Resources within 1-mile radius:	P-40-000491
Reports within project area:	SL-1643
Reports within 1-mile radius:	6 (see enclosed bibliography)

Resource Database Printout (list):	🗆 enclosed 🔳 not requested 🗆 nothing listed
Resource Database Printout (details):	\blacksquare enclosed \Box not requested \Box nothing listed
Resource Digital Database Records:	enclosed Intervention not in the image is a second seco
Report Database Printout (list):	enclosed
Report Database Printout (details):	□ enclosed ■ not requested □ nothing listed
Report Digital Database Records:	enclosed Interview not requested in the nothing listed
Resource Record Copies:	enclosed
Report Copies:	\Box enclosed \Box not requested \blacksquare nothing listed $*$
OHP Historic Properties Directory:	\Box enclosed \Box not requested \blacksquare nothing listed
Archaeological Determinations of Eligibility:	\Box enclosed \Box not requested \blacksquare nothing listed
CA Inventory of Historic Resources (1976):	\Box enclosed \Box not requested \Box nothing listed

* SL-1643 lies within the Project Area, but is an EIR and was not included in the results as per client request. It was however included on the Report Database List Printout.

Caltrans Bridge Survey:	\square enclosed	\Box not requested	\Box nothing listed
Ethnographic Information:	\Box enclosed	□ not requested	□ nothing listed
Historical Literature:	\Box enclosed	□ not requested	□ nothing listed
Historical Maps:	\Box enclosed	□ not requested	□ nothing listed
Local Inventories:	\Box enclosed	□ not requested	□ nothing listed
GLO and/or Rancho Plat Maps:	\Box enclosed	□ not requested	□ nothing listed
Shipwreck Inventory:	\Box enclosed	□ not requested	□ nothing listed
Soil Survey Maps:	□ enclosed	□ not requested	□ nothing listed

Please forward a copy of any resulting reports from this project to the office as soon as possible. Due to the sensitive nature of archaeological site location data, we ask that you do not include resource location maps and resource location descriptions in your report if the report is for public distribution. If you have any questions regarding the results presented herein, please contact the office at the phone number listed above.

The provision of California Historical Resources Information System (CHRIS) data via this records search response does not in any way constitute public disclosure of records otherwise exempt from disclosure under the California Public Records Act or any other law, including, but not limited to, records related to archeological site information maintained by or on behalf of, or in the possession of, the State of California, Department of Parks and Recreation, State Historic Preservation Officer, Office of Historic Preservation, or the State Historical Resources Commission.

Due to processing delays and other factors, not all of the historical resource reports and resource records that have been submitted to the Office of Historic Preservation are available via this records search. Additional information may be available through the federal, state, and local agencies that produced or paid for historical resource management work in the search area. Additionally, Native American tribes have historical resource information not in the CHRIS Inventory, and you should contact the California Native American Heritage Commission for information on local/regional tribal contacts.

Should you require any additional information for the above referenced project, reference the record search number listed above when making inquiries. Requests made after initial invoicing will result in the preparation of a separate invoice.

Thank you for using the CHRIS.

Sincerely,

Erin Bornemann, M.A. Assistant Coordinator

Appendix C

NAHC and Native American Correspondence

Edmund G. Brown, Jr., Gover

NATIVE AMERICAN HERITAGE COMMISSION

1550 Harbor Blvd., Suite 100 West Sacramento, CA 95691 (916) 373-3710 (916) 373-5471 FAX

November 9, 2016

Tria Belcourt Material Culture Consulting, Inc.

Sent by E-mail: tria@materialcultureconsulting.com

RE: Proposed Paso Robles Airport Solar Project, City of Paso Robles; Paso Robles and Estrella USGS Quadrangles, San Luis Obispo County, California

Dear Ms. Belcourt:

Attached is a consultation list of tribes with traditional lands or cultural places located within the boundaries of the above referenced counties. Please note that the intent of the reference codes below is to avoid or mitigate impacts to tribal cultural resources, as defined, for California Environmental Quality Act (CEQA) projects under AB-52.

As of July 1, 2015, Public Resources Code Sections 21080.3.1 and 21080.3.2 **require public agencies** to consult with California Native American tribes identified by the Native American Heritage Commission (NAHC) for the purpose mitigating impacts to tribal cultural resources:

Within 14 days of determining that an application for a project is complete or a decision by a public agency to undertake a project, the lead agency shall provide formal notification to the designated contact of, or a tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, which shall be accomplished by means of at least one written notification that includes a brief description of the proposed project and its location, the lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation pursuant to this section. (Public Resources Code Section 21080.3.1(d))

The law does not preclude agencies from initiating consultation with the tribes that are culturally and traditionally affiliated with their jurisdictions. The NAHC believes that in fact that this is the best practice to ensure that tribes are consulted commensurate with the intent of the law.

In accordance with Public Resources Code Section 21080.3.1(d), formal notification must include a brief description of the proposed project and its location, the lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation. The NAHC believes that agencies should also include with their notification letters information regarding any cultural resources assessment that has been completed on the APE, such as:

- 1. The results of any record search that may have been conducted at an Information Center of the California Historical Resources Information System (CHRIS), including, but not limited to:
 - A listing of any and all known cultural resources have already been recorded on or adjacent to the APE;
 - Copies of any and all cultural resource records and study reports that may have been provided by the Information Center as part of the records search response;
 - If the probability is low, moderate, or high that cultural resources are located in the APE.
 - Whether the records search indicates a low, moderate or high probability that unrecorded cultural resources are located in the potential APE; and
 - If a survey is recommended by the Information Center to determine whether previously unrecorded cultural resources are present.

- 2. The results of any archaeological inventory survey that was conducted, including:
 - Any report that may contain site forms, site significance, and suggested mitigation measurers.

All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for pubic disclosure in accordance with Government Code Section 6254.10.

- The results of any Sacred Lands File (SFL) check conducted through Native American Heritage Commission. <u>A search of the SFL was completed for the project with negative results.</u>
- 4. Any ethnographic studies conducted for any area including all or part of the potential APE; and
- 5. Any geotechnical reports regarding all or part of the potential APE.

Lead agencies should be aware that records maintained by the NAHC and CHRIS is not exhaustive, and a negative response to these searches does not preclude the existence of a cultural place. A tribe may be the only source of information regarding the existence of a tribal cultural resource.

This information will aid tribes in determining whether to request formal consultation. In the case that they do, having the information beforehand well help to facilitate the consultation process.

If you receive notification of change of addresses and phone numbers from tribes, please notify me. With your assistance we are able to assure that our consultation list contains current information.

If you have any questions, please contact me at my email address: gayle.totton@nahc.ca.gov.

Sincerely,

Gayle Totton, M.A., PhD. Associate Governmental Program Analyst

Native American Heritage Commission Native American Contact List San Luis Obispo County 11/9/2016

Salinan Tribe of Monterey, San

Luis Oblspo Counties Patti Dunton, Tribal Administrator 7070 Morro Road, Suite A Salinan Atascadero, CA, 93422 Phone: (805) 464 - 2650 Fax: (805) 460-9204 salinantribe@aol.com

Xolon-Sallnan Tribe

Karen White, Chairperson PO Box 7045 Spreckels, CA, 93962 Phone: 831-238-1488 blukat41@yahoo.com

Salinan

This list is current only as of the date of this document. Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resource Section 5097.96 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources assessment for the proposed Paso Robles Airport Solar Project, San Luis Obispo County.

PROJ-007636

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November 14, 2016

EXAMPLE

RE: City of Paso Robles Municipal Airport - Solar PV Project, City of Paso Robles, San Obispo County, California

Greetings,

The City of Paso Robles is proposing construction of a new solar array at the Paso Robles Municipal Airport, located in San Luis Obispo County, California (see attached map). Material Culture Consulting is conducting the cultural resources review of the project to support preparation of the environmental documents. As part of our review, we would like to request your input on potential cultural resources within the project area.

Our firm contacted the Native American Heritage Commission (NAHC) on November 1, 2016 to request review of the Sacred Lands File and for a list of tribes with traditional lands and/or cultural places within the area. The NAHC responded on November 10, 2016, stating that the Sacred Lands File review resulted in negative results, and provided your contact information as part of the list. We understand that negative results do not preclude the existence of cultural resources, and that a tribe may be the only source of information regarding the existence of a tribal cultural resource, which is why we are contacting you.

Project Location and Description

The proposed project is located on approximately 30-acres of land within the confines of the Paso Robles Municipal Airport, and directly north of the airport itself. The project area is directly east of Airport Drive (see attached map). The area of potential impact (API) will encompass the entire 30-acre project area, located within Section 12 of Township 26 South and Range 12 East (Mount Diablo Meridian).

Please respond at your earliest convenience if you wish to share any knowledge of cultural resources within or adjacent to the API. Any information, concerns, or recommendations regarding cultural resources within the API can be shared with me via telephone, email, or via standard mail. The City of Paso Robles will be the Lead Agency for the project, and can be reached directly for formal consultation requests. Thank you very much for your assistance.

Kindest regards,

C Partie

Tria Belcourt, M.A., RPA Owner and Principal Archaeologist 626-205-8279 tria@materialcultureconsulting.com

