



# Cottages at Avila Beach

## Project Description

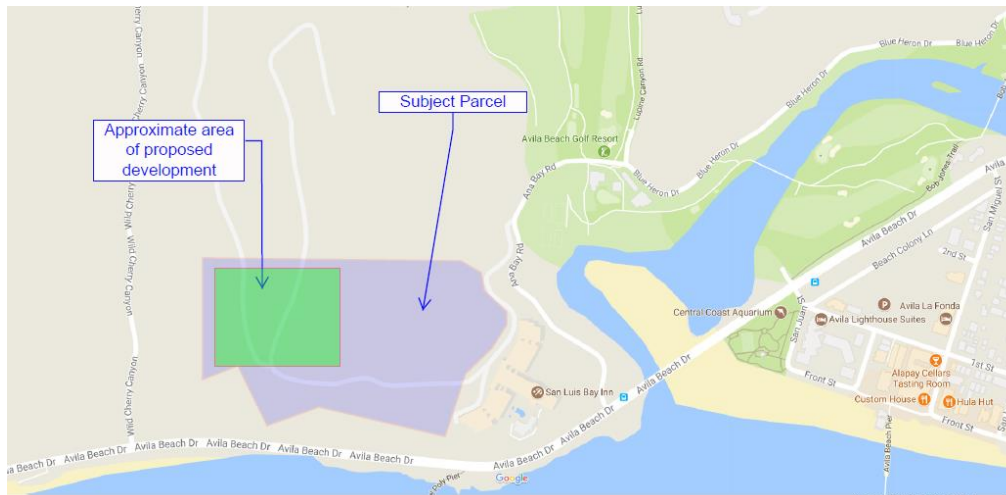
October 2018 Update

### 1.0 PROJECT REQUEST

SCM Avila Beach Partners, LLC (“the applicant”) is requesting County approval of its application for a Development Plan, Coastal Development Permit and San Luis Bay Estate Master Plan Amendment to develop a 50-room cottage style hotel in the Avila Beach area. The accompanying project description describes in detail the request and how its components will be incorporated into the surrounding environment.

### 2.0 SETTING AND OVERVIEW

The subject property is identified as APN 076-174-009 and located on 22.25 acres west of the San Luis Bay Inn and the community of Avila Beach, north of Avila Beach Drive:



The property generally slopes down to the southwest and southeast corners, and there is a knoll in the center-northern area of the property. The southern boundary of the property terminates in a bluff top. Vegetation is sparse, consisting primarily of grasslands with sparse shrubs and occasional trees, including a few oak trees.



Typical onsite vegetation. Marre house visible at upper left.



Typical onsite vegetation. Avila State Beach and Port of San Luis beyond.

San Luis Bay Estates Master Plan was approved by the County in 1981 and consisted of

multiple phases of residential development, a golf course, and the subject parcel. Development of the Plan has proceeded in phases. Many aspects have been approved and developed, and there have been previous amendments to the Master Plan as the phases have proceeded.

The subject parcel was identified as the site for 50 hotel cottages, as an adjunct to the San Luis Bay Inn, which would provide auxiliary hospitality services. Subsequent to the Master Plan approval, the Estates have been divided into multiple ownerships and the subject parcel is not affiliated with the San Luis Bay Inn. As a result, the project request includes a proposal to amend the San Luis Bay Estates Master Plan to provide hospitality (e.g. reception, restaurant, pool) services on the subject parcel.

### **Community Outreach**

The applicants embrace the community outreach philosophy and realize that a hotel on the subject parcel would be an important part of the Avila Beach area. As such, the applicants recognize and take seriously the potential benefits and impacts that the hotel may have on the surrounding communities.

Therefore, the proposed operations are mindful of its surrounding neighbors and they have been considered in the preparation of the Development Plan, as well as the siting of proposed structures and parking. The applicants will strive to keep its neighbors informed of all substantive changes to the plan via direct communication with affected neighbors, community members and neighborhood associations.

The applicants have engaged in meetings and consultations with the San Luis Bay Estates Master Homeowner's Association and San Miguelito Mutual Water Company board. They have also met with and shared plans and the results of cultural resource investigations with representatives of the Northern Chumash tribes.

Management and the design team have also presented its concepts to a variety of other stakeholders including Cal Fire, the Agricultural Commissioner's office, PG&E and community members. The resulting plans that have been submitted to the County for review reflect changes to the plans that incorporate the comments that were received during those meetings. Following application submittal, the team also engaged with the Avila Valley Advisory Council and presented the project at an AVAC meeting.

## **3.0 PROJECT DESCRIPTION**

### **Zoning and Other Designations**

The subject property is located within the San Luis Bay Coastal Planning Area, and within the urban reserve line of the Avila Community Plan. The property is zoned Recreation (REC) with a Visitor Serving (V) combining designation.

In addition, the following designations are indicated on various County maps as being potentially associated with the property or nearby areas:

- Archaeological Study Area (ASA)
- Geologic Study Area (GSA)
- Sensitive Resource Area (SRA)
- Streambeds and Riparian Vegetation (on Wild Cherry Canyon Creek to the east)
- Agricultural (parcels north and west)

The proposed Hotel use is a permitted use within the REC Zone with the discretionary approval of a Development Plan and Master Plan Amendment. A discussion of the Master Plan is provided further below.

### **Development Summary (Updated October 2018 to add entry kiosk)**

The development proposed for The Cottages at Avila Beach includes the following:

- Fifty (50) single-story cottages totaling 26,402 SF (Net, averaging ~528 SF each)
  - Clustered on the west portion of the property
  - Each cottage will have a porch and/or a deck totaling 11,115 SF
  - Developed in 6 different configurations ranging from 415 SF to 845 SF (net)
- 28,323 Net SF Lodge with the following amenities:
  - 5,331 SF Restaurant (~95 seats), Bar (~40 seats) and support facilities (Kitchen) that would be open to the public and guests of the hotel
  - 429 SF Pool Bar
  - 1,679 SF Spa (3 treatment rooms) open to guests and the public
  - 566 SF fitness center
  - 2,046 SF conference and banquet space
  - 1,032 SF Lobby/Reception
  - 299 SF Gift shop
  - 11,218 SF Partially Subterranean Parking and Valet area
  - Other Employee, Service, Mechanical and Restroom spaces
- 4,600 SF Pool Deck
- 337 SF Waste/recycling storage (impervious)
- 1,250 SF pool
- 24 SF Valet Stand at Main Lodge
- 106 SF Entry Kiosk on Entry Road

- 167 Parking spaces
  - 32 above ground spaces dispersed in pods near cottages
  - 8 in the main lodge within the motor-court
  - 127 below ground spaces using a valet stacking system
    - 43 spaces below Lodge using parking lift system
    - 84 spaces partially below ground in 10,209 SF West Parking structure using parking lift system
  
- Supporting infrastructure
  - Access roads per Cal Fire requirements
  - Fire hydrants and stand pipes
  - Water, sewer, dry utilities



Partial Site Plan for proposed development (cottages and lodge)

Total building development, including underground parking area, is estimated to be 65,291 SF (net, excluding cottage decks). Overall impervious footprint<sup>1</sup> of the lodge and

<sup>1</sup> Gross SF, including cottage decks but not including subterranean areas.

cottages will be 62,019 SF or 6.4% of the 22.25-acre site. After including the pool deck, pools, roads and other pathways, the total impervious area will be approximately 15% of the project site.

The development envelope for the project, including grading to support structures, is expected to be ~6.46 acres. The remaining acreage (excepting the access road and other areas as agreed with County staff) will be dedicated to open space per the requirements of the Master Plan. The applicant will work with the County as necessary regarding any requirements for easements within the open space.

**Proposed Structural Development (updated October 2018)**

The following table provides a summary of the proposed structural development, not including hardscape, roads and accessory structures such as the pool and solid waste storage.

**Table 3.2**

<b>Building Type/Name</b>	<b>Gross SF</b>	<b>Net SF</b>	<b>Above Ground (Net SF)</b>	<b>All or Partly Subterranean (Net SF)</b>
Lodge	29,838	28,323	8,909	19,414
Cottages (50)	30,114	26,402	26,402	0
Cottage Porches	11,115	0	0	0
West Parking	10,209	10,209	5,105	5,105
Entry Kiosk	106	69	69	0
Solid Waste Storage	337	288	288	0
<b>TOTAL</b>	<b>81,719</b>	<b>65,291</b>	<b>40,773</b>	<b>24,519</b>

Please see the accompanying statistics sheet on A0.0 from Appleton Partners for further information and cottage breakdown.

**Master Plan Amendment**

On August 27, 1981, the San Luis Obispo Planning Commission approved an EIR (ED 80-90) and Master Plan for the San Luis Bay Estates Development Plan. According to the EIR, the Master Plan encompassed 1,187 acres and included phased development of 823 dwelling units, in addition to an existing approved 162-unit mobile home park. This approval was preceded by and modified a 1967 CUP for development of 1,000 dwelling units, in addition to a hotel, golf course and other uses. The hotel, golf course and 162-unit mobile park were constructed prior to and then incorporated into the 1981 Master Plan.

The Master Plan also contemplated a 68-room expansion of the existing hotel, a golf course maintenance area, and fifty (50) “Hotel Cottage Units” on the subject parcel, as individual guest accommodations.

The plan included the following further description for the Hotel Cottage Unit parcel:

- Units to be attached or detached no higher than 35'
- Units may have efficiency kitchen units
- Units will be operated in conjunction with the (existing San Luis Bay Inn) hotel facilities
- Vehicular access will be through the existing hotel entrance
- Development within the cottage parcel will be limited to a maximum of four (4) acres with the balance committed to permanent open space.
- Development Standards will conform to all Land Use ordinance standards unless waivers are granted in the development plan approval (note: this application is the aforementioned "development plan approval" request)

Several phases of the Master plan have been completed. Many of these phases included Amendments to the Master Plan to reflect changes necessary to effectuate the development.

The applicants engaged LSA, Inc to prepare the accompanying Amendment and Policy Consistency Analysis (provided in the application) to the Master Plan that includes the following changes:

Development envelope limited to 7.0 acres (or as necessary). This change is necessary because in 1980 the hotel and the subject parcels had similar owners. And, at that time, it was projected that hospitality services (check in, meals, etc.) would be provided by the San Luis Bay Inn. However, the properties in the Master Plan are now separately held and hospitality services would be provided by the aforementioned lodge. In order to accommodate this, the applicant is requesting a larger development envelope to accommodate the cottages and lodge. It is perhaps worth noting that a previous draft of this Master Plan contemplated 6 acres in the development envelope.

Units will be operated as hotel rooms in conjunction with the onsite hotel facilities. As explained above, the subject parcel no longer has a relation to the existing San Luis Bay Inn and cannot use those facilities to provide services for the cottages. A new lodge is proposed that will provide guest services. The cottages will not have individual kitchens but will use the lodge for meals.

Primary access to the hotel will be through the existing easement through the San Luis Bay Inn. Alternative emergency egress will be via Ana Bay Road/Blue Heron Drive as discussed in more detail later.

### **Pre-Application**

A pre-application with the County of SLO was filed in late 2016 so that the applicant could obtain early feedback on the proposed project. Notes and recommendations were

provided by various department representatives (e.g. Public Works, Ag Commissioner, Cal Fire) and the current project was reviewed and revised in response to some of these comments.

### **Site Improvements and Utilities**

Apart from new buildings, the following site improvements are proposed as part of the project:

- **Driveway.** Widen and improve the existing 16-18' wide gravel access from Ana Bay road pursuant to County requirements. The applicant is proposing a 20-24' wide access road from Ana Bay to serve the subject property. The 24' width is specified in SLO County Public Works standards for driveway access to a commercial property. However, the road width has been reduced to 20' in certain locations to minimize cut and impacts to cultural resources. These changes were accepted by Cal Fire.
- **Circulation.** Additional roads for interior circulation and cottage access.
- **Utilities.** Extend utilities to the project site. An investigation is underway to reduce or eliminate trenching for utilities with cultural resource areas. The following represents the initial assessment which will be revised if feasible alternatives can be found.
  - Wet utilities (e.g. water, sewer) will be brought to the site under Ana Bay Road, where an existing water main terminates.
  - At the request of San Miguelito Mutual Water Company (SMMWC), the applicants agreed to construct a return water line that will be extended north of the property to connect to other service lines, forming a loop which will improve water quality for SMMWC customers.
  - Other utilities (e.g. power, gas) routes will be determined in coordination with service planners (e.g. PG&E)
  - Infrastructure will be provided for a reclaimed water line at such time as SMMWC can provide this service.
- **Signage.** Proposed locations for entry and directional signage are indicated on page A1.1. Specifics on signage design and lettering will be developed later.
- **Fire Suppression.** Construct fire hydrants, standpipes and sprinkler systems as required by Cal Fire. See the Master Fire Protection Plan in the accompanying plan set.
- **Water Conservation.** A grey water system will be developed to provide supplemental water for onsite landscaping. At such time as it becomes available, the hotel will also connect with SMWWC reclaimed water.

### **Grading (updated October 2018)**

Proposed grading for all phases of the project is expected to total approximately 20,300 cubic yards of cut and 18,000 cubic yards of fill. Approximately 2,300 cubic yards of export is expected, before accounting for shrinkage.



<b>ESTIMATED EARTHWORK - 9/27/18</b>				
<b>AREA</b>	<b>CUT</b>	<b>FILL</b>	<b>IMPORT</b>	<b>EXPORT</b>
ROADS (ONSITE)	5,000	3,500	0	1,500
ROAD (DRIVEWAY - OFFSITE)	450	2,000	0	-1,550
MAIN LODGE	8,400	3,000	0	5400
WEST PARKING	3,500	2,000	0	1500
COTTAGES	2,500	7,500	0	-5000
UTILITIES	450	0	0	450
<b>TOTAL</b>	<b>20,300</b>	<b>18,000</b>	<b>0</b>	<b>2,300</b>

It should be noted that much of the proposed grading is not the result of reshaping the property topography but is necessary to widen roads to meet fire code, provide underground parking, and to place the proposed cottages and pathways to the site in a way that meets code requirements (e.g. ADA). To the extent feasible, excess cut will be redistributed on-site in an attempt to reduce net export.

Maximum slopes reached 2:1 in some locations near the entry drive. Road profiles are provided within the civil drawings showing proposed slope percentages. Please see the civil plans for more detail.

### **Walls, Fences and Gates**

In order to minimize grading, retaining walls will be used in strategic areas within the development envelope and adjacent to the access road. Maximum retaining wall heights are expected to be 8' as further shown on the civil plans.

Because of adjacent agricultural grading land, a vernacular style of fencing that will not inhibit small animal migration is proposed along portions of the western and northern development envelope to discourage trespassing and harassment of cattle. Guard rails will be required along some portions of the access road where it abuts steeper slopes.

A split rail or similar vernacular style gate is proposed at the main entry to the property. It will be manned by staff in a small gatehouse who will direct guests, visitors and deliveries.

### **Open Space and Trails**

Section III.C.5 of the approved Master Development Plan states that the balance of the project area not used for development will be dedicated to permanent open space and given credit in project-wide open space calculations. As noted earlier, the applicants have proposed to amend the Master Plan to expand the development envelope to ~6.5 acres. The remaining acreage (except that required for access) would be thus be dedicated as permanent open space.

The applicant will work with County staff and any designated agency or non-profit to plan for management of the open space and to accommodate on-site trails that may be required in order to comply with County policies. However, it is our understanding from representatives of the Northern Chumash that public trails in the vicinity of sensitive archaeological resources would not be welcomed.

## **4.0 OPERATIONS**

Guests of The Cottages at Avila Beach will arrive via the main driveway and Ana Bay Road and will be directed to the main lodge for check-in. All vehicles will be valet-parked in one of the underground garages located on the property. In order to minimize parking impacts from the hotel on the neighboring community, the hotel will offer courtesy shuttle service to guests from the hotel to nearby commercial areas and local beaches.

The hotel will operate 50 single-key cottages and guests will be able to choose among five (5) different floor plans. On-site services will include access to a pool, fitness area and small spa.

### **Hotel Employees**

The hotel will be staffed with a variety of personnel to enhance the guest experience including: reception, entertainment, food service, retail, management, security, housekeeping and maintenance staff. As the hotel is a 24-hour operation, employees would work in 3-4 shifts, with some workers being part-time. Ample parking will be available for hotel employees.

### **Special Events (updated October 2018)**

Within the main lodge, a banquet and conference space will be available as a meeting and dining area for business and local non-profit organizations. Smaller events (30 or fewer persons) are anticipated to make up the vast majority of special events at the hotel and would have little or no impact on hotel operations or the surrounding community.

On occasion, a larger (31-100 persons) event may be held in the banquet space, but the restaurant will remain open to hotel guests and the public. The applicant proposes to limit these types of events as described in the chart below.

There will also be occasions where the entire hotel is booked for a special event (typically, a wedding) and the restaurant is closed to the public. In these cases, up to 200 visitors, including event staff and hotel guests, may attend. On-site valet parking has been specifically designed to handle the parking requirements for these larger events using the underground garages and small pockets of above ground parking that would otherwise not be used.

Except wedding ceremonies, events (and wedding receptions) would typically be held indoors, or within the pool area. In no case would exterior amplified sound be allowed after 10 PM or before 9 AM. Pool, spa and gym facilities will be available only to hotel guests.

The table below provides additional information on special events. In all cases, parking would be accommodated on-site.

Category	Size (guests)	Restaurant Open to Public?	Max # of events per year	Notes
Large	31-200	No	40	This describes an event where the hotel is entirely booked by event guests. Additional guests may attend that are not hotel guests and the upper threshold of 200 participants includes event staff. The public would be notified that the restaurant is closed due to a private event. These events would not be scheduled during identified special community events (e.g. Blues Festival). The applicants do not expect to provide shuttle service.
Medium	31-100	Yes	100-150	Events that use the banquet space but do not reserve the restaurant. Could be a smaller wedding, retirement party, community event, awards ceremony, etc. It is expected that these will be requested <u>at most</u> 2-3 times per week by community organizations or private groups where guests are not (or many are not) staying at the hotel. The listed maximum # of events is likely significantly more than would actually be held, but represents an upper maximum. During these events, the restaurant would remain open to the public. A TDM could be required for events that exceed 78 persons where the restaurant remain in use.
Small	30 or fewer	Yes	unlimited	Small events where the banquet space is used by persons other than hotel guests e.g. private dinner, smaller community events. The applicant would prefer not to have to maintain records on smaller events such as these that are unlikely to have significant traffic or noise impacts. Therefore, we are suggesting that the number of these types of events not be restricted.

## **Access**

### Primary Access

Guests, employees and deliveries will access the hotel via Ana Bay Road to a private drive. The road will be widened and improved as necessary to meet Cal Fire and SLO County Public Works standards. Because of the possibility of archaeological resources in this area, the applicant will work with the project archaeologist, engineer and County to minimize soil disturbance to the maximum extent feasible. The applicant is proposing to design portions of the access road to be 20' wide (rather than 24' as typically prescribed) in order to minimize impacts on sensitive resources. All soil disturbance in sensitive areas will be monitored by an archeologist and Native American observer.

### Secondary emergency ingress and egress

At the request of Cal Fire during the pre-application phase, the applicants have explored a secondary emergency egress which does not involve cross over the bridge on Avila Beach Drive. This route will provide an alternative means of escaping the project site during a fire or other serious emergency.

In such an emergency, guests and employees will exit the site via the main driveway and proceed north on Ana Bay Road through the golf course and onto Blue Heron Road. Blue Heron terminates near the Bob Jones Trail at a gate which leads to Coffeeberry Place. The gate will be opened for egress by hotel staff (there will be multiple methods available to open the gate in the event of serious emergency) allowing access to San Luis Bay Drive without crossing a bridge or going through downtown Avila Beach.

As a member of the Master Home Owners Association (HOA) for San Luis Bay Estates, the hotel has the access rights for emergency purposes to HOA roads including Blue Heron Road, Coffeeberry Place and Lupine Canyon Road. The applicant will work with Cal Fire and the HOA to improve the gate at Coffeeberry Place and adjust the width of Blue Heron Road as needed to provide satisfactory emergency egress.

### Wild Creek Cherry Canyon

An existing ~16' wide unpaved road links the property to Wild Creek Cherry Canyon. However, at this time there is no intention to use this route as a hotel access. If an access easement is obtained from PG&E, access to the beach could be provided via a pedestrian trail to Avila Beach drive, but would be separate from the road.



Hotel access plan

## 5.0 ENVIRONMENTAL CONSIDERATIONS

In considering the Development Plan, the design team recognized that key issue areas needed further study and retained professionals to assist them in assessing potential impacts. Where necessary, the applicants have implemented pro-active measures to reduce potential impacts to levels of insignificance. After reviewing the results of the various reports, which are cited below, it is not anticipated that there will be any adverse impacts (as defined by CEQA) as a result of the project request that cannot be effectively mitigated to a level below significance. Nevertheless, the applicants are requesting that the County prepare an Environmental Impact Report to study the project.

The following reports were prepared on behalf of the applicants and have been submitted with this application:

- **Biological Resources Assessment and Tree Survey (LSA) (Amended September 2018)**
- **Transportation Impact Study (Central Coast Transportation Consulting) (Amended September 2018)**
- Cultural Resource Study – SLO-056 and SLO-2440 (2015 Applied Earthworks)
- Phase II Archaeological Evaluation of SLO-2440 (2017 Applied Earthworks)
- Paleontological Resource Assessment (Applied Earthworks)
- Environmental Noise Study (45dB)
- Historic Resources Study (Preservation Planning Associates)
- Water and Sewer Use Analysis (Dudek)
- Storm Water Control Report (Flowers & Associates)

- **Preliminary Drainage Report (Flowers & Associates) (September 2018)**
- **Preliminary Stormwater Control Plan (Flowers – September 2018)**
- Coastal Bluff Evaluation – (GeoSolutions)
- Soils Engineering Report (GeoSolutions)
- Air Quality Impacts Analysis (LSA)
- Visual Simulations (Appleton Partners)
- Phase I Environmental Site Assessment (AEI Consultants)

Additionally, the material below was compiled by the applicants and has been supplied with the application (a detailed listing of the Attachments is included at the end of this document):

- Architectural Drawings (Appleton Partners)
- Concept Landscape Plans (Appleton Partners)
- Civil Drawings (Flowers & Associates)
- Site Statistics Summary (Appleton Partners) – provided on plans
- Request for Jurisdictional Determination to ACOE (LSA) shown in Bio Assessment
- Intent to Serve Letter from SMMWC
- Preliminary Title Report (First American Title)
- **Slope Exhibit**
- **Setback Mod Exhibit**
- **Road Easement Agreement**
- **Response letter from LSA regarding peer review**

A summary discussion of each environmental issue area follows.

#### **A. AGRICULTURAL RESOURCES**

The project site is located adjacent to periodically used grazing lands to the north and west. In order to minimize impacts to the adjacent lands and reduce the likelihood of harassment of cattle, the project will incorporate the following components:

- The olive trees shown on the concept landscape plans that are proposed to be scattered among the cottages will be of the fruitless variety. This will prevent inadvertent migration of the olives onto the agricultural land and reduce or eliminate the need for herbicide/pesticide to control volunteers.
- Fencing and appropriate signage will be placed along portions of the north and west property boundaries near the development envelope, to discourage trespassing into the agricultural areas.
- Upon arrival, guests will be provided information about the adjacent agricultural areas and advised not to trespass, nor harass cattle. Guests in units adjacent to the agricultural areas that wish to be relocated will be accommodated.

In addition, a proposed 100' fuel management buffer on the adjacent property will serve as a de facto agricultural buffer as cattle (if present) will be less likely to graze in these maintained areas.

## **B. AIR QUALITY**

An air quality impact analysis was performed by LSA, Inc. (see memo dated February 2018). The design team does not project any long-term impacts to air quality as a result of the proposed project.

As discussed in the traffic analysis, regional traffic is not expected to increase significantly as a result of the project request and thus no additional air quality impacts are expected as result of automobile traffic. The proposed project would be consistent with applicable land use and transportation control measures outlined in the Clean Air Plan (CAP) and would therefore be considered consistent with the CAP.

Short-term impacts from construction could occur as a result of earth movement. In order to mitigate this, the applicants propose to implement standard mitigation measures as recommended by the Air Pollution Control District (APCD) to control airborne particles. Construction emissions were estimated for the project using CalEEMod. Specific construction details are not yet known; therefore, default assumptions (e.g., construction duration and fleet activities) from CalEEMod were used. For purposes of this analysis, the construction schedule for all improvements was assumed to be approximately 13 months. The results were then compared to the SLO County APCD's established thresholds of significance for construction impacts

Under this scenario, unmitigated project emissions would not exceed the significance threshold for criteria pollutants. Therefore, construction of the project would result in less-than-significant impacts and would not violate any air quality standard or contribute substantially to an existing or projected air quality violation.

### Naturally Occurring Asbestos

A geologic evaluation for the proposed project was performed by GeoSolutions in October 2016. The evaluation determined that due to the depth of ultra-basic type rocks that occur near the property, there would be a low potential for the presence of naturally occurring asbestos.

Additionally, the project would not modify or disturb the base of the bluff or the underlying basaltic type rock. Therefore, it is anticipated that the project is subject to NOA requirements but would not be disturbing NOA and thus an exemption to APCD regulations would apply.

### Operational Emissions

Long-term air emission impacts are those associated with area sources and mobile sources involving any change related to the project, such as changes in the type of permanent use of the project site.

These long-term emissions are primarily mobile source emissions that would result from vehicle trips associated with the project. Area sources, such as natural gas heaters, landscape equipment, and use of consumer products, would also result in pollutant emissions during the operation of the project.

As shown in the report, the emissions associated with the operations of the project would be well below the significance thresholds set by the SLO County APCD. Therefore, impacts associated with project operation would be less than significant and the project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. Mitigation would not be required.

#### Cumulative Impacts

As shown in Tables 6 and 7 in the memorandum, implementation of the proposed project would generate less than significant construction and operational emissions. Therefore, the project would not make a cumulatively considerable contribution to regional air quality impacts.

#### Greenhouse Gas Emissions

According to the SLO County APCD, a project would have less-than-significant GHG emissions if it would meet one or more of the following criteria: be consistent with a qualified GHG reduction plan, result in operational-related GHG emissions of less than 1,150 metric tons of CO<sub>2</sub>e a year, or result in operational-related GHG emissions of less than 4.9 metric tons of CO<sub>2</sub>e per service population (residents plus employees).

The County does not have a qualified GHG reduction plan. Therefore, the determination of significance is based on the emission estimates. Based on the analysis results, the project would generate approximately 1,115 metric tons of CO<sub>2</sub>e which is below the SLO County APCD's numeric threshold of 1,150 metric tons CO<sub>2</sub>e. Therefore, the project would not have a significant effect on the environment related to GHG emissions.

#### Mitigations

The SLO County APCD has specified several emission reduction measures that would be applicable to the project. These emission reduction measures, which are identified in the air quality memorandum, when incorporated into construction



specifications, would meet the SLO County APCD's requirements for fugitive dust and asbestos control.

### Summary

As identified above, the proposed project would be consistent with applicable land use and transportation control measures outlined in the CAP and would therefore be considered consistent with the CAP. In addition, based on the analysis presented above, construction and operation of the project would not result in the generation of criteria air pollutants that would exceed SLO County APCD thresholds. Implementation of the SLO County APCD's construction emission reduction measures would further reduce construction dust impacts.

The project would not make a cumulatively considerable contribution to regional air quality impacts. The project is not expected to expose future guests to significant TAC emissions or produce significant TAC emissions that would affect nearby sensitive receptors. The project would not result in objectionable odors affecting a substantial number of people. GHG emissions during construction and operation of the project are estimated to be lower than significance thresholds, and would not be cumulatively considerable.

Sustainability measures included in the project plans would not conflict with the County's EnergyWise Plan. Therefore, with implementation of the SLO County APCD's construction emission reduction measures, the project would result in less-than-significant air quality and GHG emissions and mitigation would not be required.

## **C. ARCHAEOLOGY**

The project site is associated with two (2) known archaeological study areas: SLO-056 and SLO-2440. As a result, the applicants engaged Applied Earthworks (AE) to provide further Phase I and Phase II analysis of the cultural resources in these areas and the possible impacts of development. Copies of these reports were supplied to representatives of the Northern Chumash in the summer of 2017.

### SLO-056

Located on the adjacent parcel to the east, SLO-056 is an important cultural resource. Following previous studies, the applicants engaged AE to study the onsite extent of SLO-056 and a report was prepared in January 2015. Due to the sensitivity of the onsite resources, AE recommended avoiding development in this area. After reviewing the report and recommendations, the applicants revised their project design to relocate an above-ground parking lot and storage building that was previously proposed in this location. As a result, the only remaining development proposed within the identified boundaries of SLO-056 would be:

- Fire Department required widening and improvement of the access road from the current ~16'-18' to approximately 24'
- Extension of utilities under the existing road, if needed<sup>2</sup>.
- Provisions for stormwater

The applicants have coordinated with Cal Fire to limit road widening improvements to the minimum necessary to meet life safety standards.

Regardless, the applicants will work with the County and Northern Chumash to select appropriate mitigations and will engage an archaeologist and Native American to monitor all earth disturbance within sensitive cultural areas.

### SLO-2440

Based on the above referenced Phase I investigations concluded in 2015 and, due to proposed development, AE recommended a Phase 2 investigation at CA-SLO-2440. The Phase 2 investigation at this smaller ridge top site was undertaken in October 2016 and included consultation with members of the YTT and the Northern Chumash Tribal Council. These investigations and consultation resulted in the determination that CA-SLO-2440 is eligible for listing on the CRHR under Criterion 1 due to its association with Chumash life on San Luis Obispo Bay during the Late Period.

A portion of the proposed development envelope and a few of the proposed cottages extend into the survey area for SLO-2440. The archaeology team have suggested possible mitigation measures that could be considered in order to reduce impacts below the level of significance. From the report:

*“Mitigation measures that could reduce Project effects on CA-SLO-2440 to a less than significant level could entail additional research (off site) to develop a more comprehensive picture of how the Late Period Avila Beach Chumash village complex operated as a social-cultural-network. This research might include any or all of the following:*

- 1. Preparing a comprehensive synthesis of previous archaeological investigations for sites along San Luis Obispo Bay that may be associated with the Chumash village complex;*
- 2. Employing current analytic methods to re-analyze artifacts and faunal remains that were recovered from CA-SLO-56 during previous excavations (e.g., Klar 1977, Conway 1998, Gibson 2012, Jones 2012) and now reside in museum collections, as well as artifacts and faunal remains recovered from other prehistoric sites along the shoreline of San Luis Obispo Bay;*

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<sup>2</sup> According to our records, a water main is currently under a portion of the driveway on the off-site driveway easement. The historic report by PHA concludes that the driveway is likely the site of an abandoned horse-drawn rail line. The applicant is actively investigating alternative routes for utilities to avoid cultural impacts.

3. *Scanning previous collections in 3D to develop a virtual assemblage that would be available to the Northern Chumash and researchers;*
4. *Developing educational/interpretive displays on Chumash use of the marine environment as well as the surrounding landscape, and providing artistic portrayals of village life. Placing displays along sidewalks in Avila Beach, at the pier, and in areas that receive significant public use, would raise public awareness of Chumash contributions to the history of the region. Such displays and exhibits should be developed in close consultation with the Northern Chumash, and could be presented in Chumash, English, and Spanish.*

*There are many creative ways to mitigate Project effects on CA-SLO-2440 to a less than significant level. Identification of appropriate mitigation measures must be developed in close consultation with representatives of the Northern Chumash, as this resource is directly linked to their ancestors.*

*The County may consider preparation of a Historic Properties Treatment Plan (HPTP), developed in close consultation with the Northern Chumash, as means to identify mitigation measures that will reduce Project effects on CA-SLO-2440 to a less than significant level.”*

As with SLO-056, the applicants will work with the County and Northern Chumash to select appropriate mitigations and will engage an archaeologist and native American to monitor all earth disturbance within sensitive cultural areas.

### **Paleontology**

In order to evaluate consistency with SLO County General Plan Policies (CR 4.5.1 and 4.5.2), Applied Earthworks was engaged to performed a paleontological resource assessment. The study consisted of a museum records search, a comprehensive literature and geologic map review, and a field reconnaissance survey.

AE found that the project overlies the Squire member of the Pismo Formation, a geologic unit known to contain significant vertebrate fossils. As such, Project related grading and trenching were determined to have the potential to adversely affect paleontological resources. The following management recommendations were identified to minimize impacts on fossil resources:

- Workers Environmental Awareness Training
- Monitoring of all ground disturbing activities by a qualified paleontologist.
- Curation of all fossils collected during ground disturbance with a final report and donation to a appropriate repository.

## D. BIOLOGY

### Biological Assessment (Revised September 2018)

A Biological Assessment was completed by LSA Associates Inc. in March 2018 and updated in September 2018 to respond to peer review and include potential impacts from stormwater and a contemplated pedestrian trail. The survey area is flanked by two jurisdictional waterways: the mouth of San Luis Obispo Creek to the east and the creek associated with Wild Cherry Canyon Creek to the west and included the 22.5-acre subject parcel as well as a 100' corridor along the proposed entry access and Wild Cherry Canyon Road, totaling 35.7 acres. Additional areas were included to assess impacts from fuel management, a proposed stormwater pipe, and a contemplated pedestrian trail. The total revised survey area totals ~44.5 acres.

**Table B: Vegetation Community Acreages Within the Overall Survey Area**

Vegetation Community	Acreage
Annual Brome Grassland	21.03
California Sagebrush Scrub	13.57
Coast Live Oak Woodland	7.23
Coast Live Oak Riparian Woodland	1.28
Developed Areas and Roads	0.49
Ornamental Landscape	0.71
Bare Ground / Bluff Slope	0.19
<b>Total</b>	<b>44.50</b>

LSA biologists conducted a total of seven (7) field surveys between January 28 and September 7, 2018. A wildlife survey was conducted on January 29, 2018. A tree inventory was conducted in May 2015 and 2018 and a jurisdictional delineation was conducted in August 2017. A follow up survey was conducted in September 2018 to map and assess oak trees within and adjacent to the development envelope. These survey efforts included focused botanical surveys, vegetation community mapping, a wildlife survey, and a habitat assessment for California red-legged frog (CRLF; *Rana draytonii*), a federally listed threatened species and California species of special concern.

Four distinct natural vegetation communities and three anthropogenic areas were documented within the overall survey area. The identification and characterizations of these vegetation communities generally follow the plant community descriptions in the MCV (2009). Natural vegetation communities identified include: Annual Brome Grassland, California Sagebrush Scrub, Coast Live Oak Woodland, and Coast Live Oak Riparian Woodland. Anthropogenic areas are those areas that have been converted from their natural habitat to one that is subject to human maintenance and disturbance; these areas included developed areas and roads, ornamental landscape, and bare ground.

By conducting vegetation removal or trimming and initial site grading outside the nesting bird season, the proposed project is not expected to have an adverse effect on special-status plants or animals. By implementing BMPs such as a silt fence along the disturbance limits, erosion and off-site sedimentation will be kept out of riparian areas. Additionally, the fence will act as a barrier for CRLF, minimizing the potential for CRLF to enter work areas during construction. With implementation of Mitigation Measures listed in the BA, the biologist concludes that the proposed project would result in no direct or indirect impacts to special-status plant or wildlife species and potential impacts to other biological and aquatic resources would be effectively minimized or avoided.

Measures identified in the Resource Assessment regarding revegetation, restoration, tree protection/replacement and nesting birds, CRLF protection, fencing and pre-construction surveys will be incorporated into the project.

#### Erosional Feature and Other Agencies

A formal jurisdictional delineation report prepared for the proposed project (LSA 2017) did not identify waters of the United States that meet ACOE jurisdictional status definitions within the study area. However, the ACOE reserves the right to make the final determination as to whether any jurisdictional features exist on a given property. As such, a jurisdictional determination request was submitted to the ACOE pursuant to Regulatory Guidance Letter 16-01 (ACOE 2016).

Pursuant to USACE Regulatory Guidance Letter (RGL) 16-01 (USACE 2016), the results of the jurisdictional delineation were submitted in a request to the USACE for an Approved Jurisdictional Determination in September 2017. A field verification survey was conducted by Corps Regulatory Division (North Coast Branch) Project Manager Gerardo Hidalgo and LSA Biologist Bo Gould on January 29, 2018. The Corps issued an Approved Jurisdictional Determination for the project on February 7, 2018 (Attachment C of Appendix F). The USACE Approved Jurisdictional Determination for the project concludes that there are no waters of the United States within Clean Water Act (CWA) jurisdiction present on the project site.

The State Regional Water Quality Control Board (RWQCB) may assert authority over waters of the State pursuant to the Porter-Cologne Water Quality Control Act, which would require compliance with applicable waste discharge requirements.

Although CWA jurisdiction has been determined to be absent by the USACE, the Regional Water Quality Control Board may assert authority over waters of the State pursuant to the Porter- Cologne Water Quality Control Act, which would require compliance with applicable waste discharge requirements.

The project may also require a California Fish and Game Code Section 1602 Streambed Alteration Agreement from the CDFW, although the delineated erosion

features do not support riparian vegetation or resources typically associated with rivers or streams. The CDFW may choose not to assert jurisdiction due to the ecological similarities of the erosional features with their immediately surrounding upland habitat and lack of importance to fish and wildlife resources that are normally associated with streams. Regardless, the applicant will submit a Notification of Streambed Alteration to the CDFW to ascertain whether a Streambed Alteration Agreement is required for any slope stabilization work in this area.

San Luis Obispo Creek, a jurisdictional waterway, was determined to be outside the survey area, and the development limits of the proposed project. The ephemeral creek associated with Wild Cherry Canyon would also be considered a jurisdictional waterway. Although portions of the creek are located within the survey area, as with San Luis Obispo Creek, Wild Cherry Canyon is outside the development limits of the proposed project and would not be affected.

### **Tree Protection**

A tree inventory and assessment was prepared and submitted by LSA. The applicant proposes to implement the standard tree protection measures to protect trees from damage during construction. For example, during construction, trees that are not proposed for removal will be protected by temporary fencing designed to prevent equipment from operating within sensitive root areas, and compacting the soils. Any oak or other native trees that are significantly impacted as a result of the project will be mitigated with replacement trees as discussed in the Assessment. No loss of oak woodland is anticipated.

### **Open Space and Trails**

Pursuant to the Master Plan, any areas not specifically part of the development area or the access to the development area will be dedicated to permanent open space. The applicants will work with County of San Luis Obispo Planning and Parks staff to prepare the appropriate plans and documents for dedicating and managing the open space and to accommodate any trails that may be required pursuant to the Master Plan or other County document.

### **Bird Nesting**

The applicants will engage a qualified biologist to conduct bird nesting surveys prior to commencing proposed grading and development operations, pursuant to the recommendations of the biologist and/or any conditions imposed on the project and as identified in the Assessment.

## **E. TRAFFIC AND CIRCULATION**

### **Transportation/Traffic**

Central Coast Transportation Consulting (CCTC) was engaged to prepare a Transportation Impact Study. Ten intersections were evaluated during the weekday afternoon (4-6 PM) and summer Saturday midday (11 AM-1 PM) time period, and five roadway segments were evaluated using ADT thresholds for County operated facilities and during the PM peak hour for Caltrans facilities.

The following deficiencies and recommended improvements were noted under Existing Plus Project conditions:

- Avila Beach Drive/Ontario Road (#9): The addition of project traffic degrades conditions on the southbound approach, which operates at LOS D during the weekday PM peak hour and LOS E during the Saturday MD peak hour under Existing Plus Project conditions. This intersection meets the peak hour signal warrant. Signalization of this intersection would result in acceptable operations and is included in the County's Roadway Impact Fee program.
- Avila Beach Drive/US 101 SB Ramps/Shell Beach Road (#10): The addition of project traffic worsens delay on the side street approaches, with the worst approach continuing to operate at LOS D during the weekday PM peak hour and degrading to LOS F during the Saturday MD peak hour under Existing Plus Project conditions. This intersection meets the peak hour signal warrant. Caltrans approved a Project Study Report-Project Development Support document in May 2016 and the County is proceeding with the Project Approval and Environmental Document phase for interchange improvements at this location. The Intersection Control Evaluation for this intersection recommends a single lane roundabout, which would result in acceptable operations. These improvements are included in the County's Roadway Impact Fee program.

Cumulative conditions reflect buildout of land uses in the area and include roadway improvements funded in the County's Roadway Impact Fee program. No improvements are recommended to address Cumulative deficiencies.

### **Parking**

An ordinance-based analysis of the parking requirements was also prepared by Central Coast Transportation and found that the proposed parking is adequate:

Chapter 22.18 of the County’s Land Use Ordinance specifies parking requirements for the project. Table 9 summarizes the code-required parking.

<b>Table 9: Code Required Parking Summary<sup>1</sup></b>				
Use		Rate	Size	Spaces
Restaurant	Customer Spaces	1 space per 60 sf of customer area plus	4,499	75.0
	Employee Spaces	1 space per 360 sf of customer area plus	4,499	12.5
	Employee Spaces	1 space per 100 sf of kitchen (active food prep)	2,084	20.8
<i>Restaurant Subtotal</i>				<i>108.3</i>
Hotel		2 spaces, plus		2
		1 per unit, plus	50	50
		1 per 10 units		5
<i>Hotel Subtotal</i>				<i>57</i>
<b>Total Code-Required Spaces</b>				<b>166</b>
1. Source: County of SLO Parking Standards defined in Chapter 22.18 of the Land Use Ordinance.				

Table 9 shows 166 parking spaces required for the site. No reductions have been applied for shared parking on site. The proposed parking supply is adequate.

### **Internal Circulation**

In addition to their report, CCTC was also consulted on specifications for internal circulation to ensure vehicles, fire trucks, service and delivery vehicles would be able to efficiently navigate the property.

The following recommendations were provided to improve site access and on-site circulation:

- Improve the Project Driveway/Ana Bay Road intersection to provide acceptable sight distance by trimming vegetation that obstructs the sight distance.
- Develop a pedestrian path of travel to Avila Beach Drive.

The applicants will engage the owner(s) of the adjacent property to discuss implementing the vegetation trimming at the appropriate time.

Due to sensitive cultural resources in the area of the driveway, it is infeasible to provide a safe pedestrian path of travel down the driveway. As discussed previously, the hotel will provide courtesy transportation via electric shuttle to guests of the hotel. Two (2) shuttles will be made available to guests wishing to visit Avila, the beach or pier. Further, the applicant is exploring an easement on the PG&E property to the west that would allow for a pedestrian access to Avila Beach Drive and the public beach.



## **F. DESIGN**

The designs and architecture for the proposed Cottages at Avila Beach were prepared by Appleton Partners, Inc. In addition to creating an experience that will be enjoyable to future guests of the hotel and meets the vision of the applicants, the plans are a result of time spent studying numerous factors, some of the described in this project description and including site topography, soils, bluff setbacks, biological habitat, archaeology, fire safety, and more.

The results and conclusions of this research were then integrated with the design and functionality goals of the community, and further influenced by comments received at meetings with the remainder of the design team, and community stakeholders.

### **Neighborhood Compatibility**

The proposed lodge and cottages will not be visible from Avila Beach due to intervening topography. However, there will be glimpses of the lodge and other buildings from portions of Avila Beach drive and some areas of the State Beach.

One of Appleton's primary goals is to ensure that the design of the future additions and new structures is compatible with the land and its surroundings. In order to achieve this goal, the architects have utilized a variety of information such as the Historic Resources report prepared by Post Hazeltine, as well as their own analysis of surrounding topography, nearby buildings, coastal landscape architecture and the character of Avila Beach.

The design of the cottages and lodge are vernacular in type and the small scale and massing of the buildings and their position in the landscape will therefore not significantly impact the setting of the nearby Marre House (see Historic Resources).

### **Architecture and landscape**

The architecture for all buildings proposed draws from the tradition of vernacular rural California barns, with weathered wood siding and shake roofs.

A series of 50 small, single-story private guest Cottages ranging from 480 to 950 SF will be located on the west portion of the property. Fruitless olive trees are proposed to be planted between the Cottages to provide a combination of screening, as well as a sense of agricultural history, suggesting that part of the site may have once been an orchard.

At this early stage, the concept landscape plan divides the property into zones and prescribes a recommended palette for each zone. Additionally, a seed mix would be used to help mitigate loss to sage scrub.

Some fragrant drought-tolerant and low-water shrubs and ground cover will be used around and adjacent to the buildings, but the majority of the site will be California native planting (Live Oak, Coastal Sage Scrub, and Native Meadow Grasses) to tie in with existing trees and plants.

## **G. FIRE SAFETY**

The applicants have met several times with Cal Fire personnel to discuss fire safety on the project site. The areas of primary interest include emergency ingress and egress, fuel management, fire access, fire hydrants and standpipes.

A fire safety specialist has been engaged by the design team and a fire safety exhibit has been included in the project plans. These plans show the proposed entry drive. The applicants worked with Cal Fire to reduce the width of the access road where possible from the typical 24' wide access road to 20' in certain places, in order to reduce potential impacts on sensitive archaeological resources.

In order to provide the necessary fuel modification buffer, the applicants are working with the adjacent property owner to obtain a 100' fuel management easement that will allow the hotel to periodically maintain the buffer area to reduce fuels.

As stated earlier in this document, the applicants are a member of the San Luis Bay Estates and have the rights to access HOA roads in the case of an emergency. The applicants have met with Cal Fire to discuss the use of Blue Heron and other HOA roads to provide a secondary means of egress. An existing gate at Coffeeberry Place will be modified to allow it to be remotely opened in the event of emergency. Existing encroachments (e.g. potted flowers) on Blue Heron near the golf course clubhouse area will be removed and the road widened as necessary to meet Cal Fire requirements.

In an emergency where access across the bridge to Avila is compromised, guests and employees of the hotel will be directed to leave the property via Blue Heron Road to Coffeeberry Place to Lupine Canyon Road and San Luis Bay Drive as shown in the egress exhibit earlier in this document. Hotel staff will be able to remotely open the gate at Coffeeberry Place to allow egress. In the event of power loss, hotel staff will have a key and/or remote entry device that will allow them to open the gate.

The applicants will continue to work with Cal Fire on other items that may be necessary for fire safety including preparation of a disaster procedures manual.

## H. GEOLOGY

### Soils

GeoSolutions was engaged by the applicants to prepare an analysis of the suitability of the on-site soils for development. Their Soils Engineer Report (2016) included a Seismic Hazard Analysis, Analysis of Structural Design Parameters, Liquefaction Potential, and general foundation analysis.

The primary geotechnical concerns for the property were identified as follows:

- The presence of loose surface soils.
- The potential for differential settlement occurring between foundations supported on two soil materials having different settlement characteristics, such as soil and rock.
- The proximity to a steep and tall bluff face.

Foundation recommendations were supplied to address these, and the applicants will consult with GeoSolutions during the preparation of working drawings.

### Coastal Bluff Evaluation

Due to the proximity to coastal bluff and previous slide activity, a Geologic Coastal Bluff Evaluation was also prepared by GeoSolutions, in order to ensure that the proposed hotel facilities were adequately set back from the top of bluff.



2015 Photograph of the Site showing bluff

## Recent background

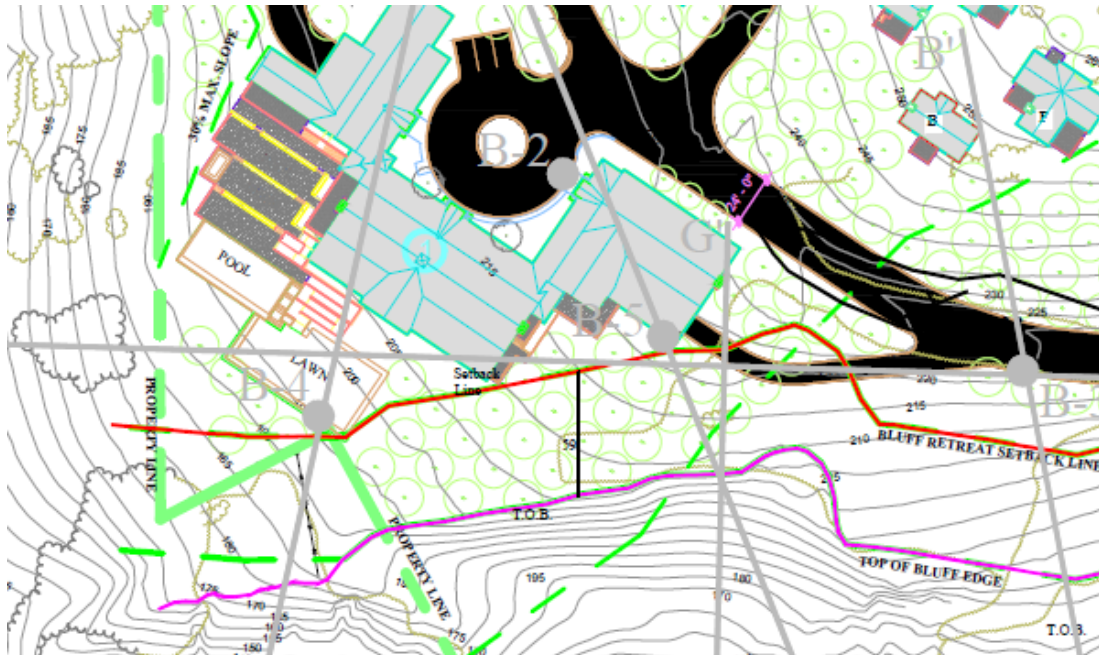
In 2011, removal and re-grading of the bluff was performed by the County of San Luis Obispo due to slope failures from intense storms in 2010. Kane GeoTech performed a visual assessment of the slope and made the following statement:

*“Approximately 1500-yds of material translated downslope in the two storm events ... and formed a debris fan at the base of the slope.”*

The Kane Geotech report also stated that *“A marginally stable mass estimated to be approximately 2600-yds remain near the top of the slope. The mass is over-steepened and unsupported and will likely fail in the near future.”*

Grading was performed by the County of San Luis Obispo, which included removal of the aforementioned marginally stable mass at the top of bluff and construction of a 1:1 buttress fill slope along the base of the slope.

## Bluff Retreat and Setbacks



Depiction of recommended bluff setback

A bluff retreat rate was determined during the previous Geologic Coastal Bluff Evaluation (GeoSolutions, May 30, 2008). While the top of bluff has been altered during removal of the unstable mass along the bluff performed by the County of San Luis Obispo in 2011, the remainder of the bluff top has not been altered since the original investigation. Therefore, the bluff retreat rate is anticipated to be the same as

determined in the referenced report. However, the top of bluff has been relocated due to the previous grading. The original bluff retreat analysis is described below.

The bluff within the study area is actively eroding and is expected to continue to retreat. A historic bluff retreat rate for the Site based upon a reliable aerial photograph evaluation was completed. The evaluation required site-specific research, with an established rate based upon the actual data interpretation by a Certified Engineering Geologist with experience and knowledge of coastal processes and local bluff conditions.

An aerial photogrammetric investigation was conducted to determine the long-term retreat rate of the bluff. A residence is apparent north of the subject property in a 1939 aerial image; aerial photography was determined to be the best option to determine bluff erosion through time.

Based on this analysis, GeoSolutions prepared recommendations for conservative bluff setbacks (including the potential for sea level rise) which have been incorporated into the project plans. All proposed development is located inward of the recommended 59' bluff setback in the vicinity of the proposed lodge.

## I. HISTORIC RESOURCES

In order to evaluate project impacts to significant or potentially significant historic resources located on or adjacent to the project site, the applicants engaged Post Hazeltine Associates (PHA) to prepare a Historic Resources Report. Their research identified two (2) possible historic resources: The nearby Marre Ranch House and evidence that the project site once supported the Right-Of-Way for a horse-drawn railway.



Photo from PHA historic report

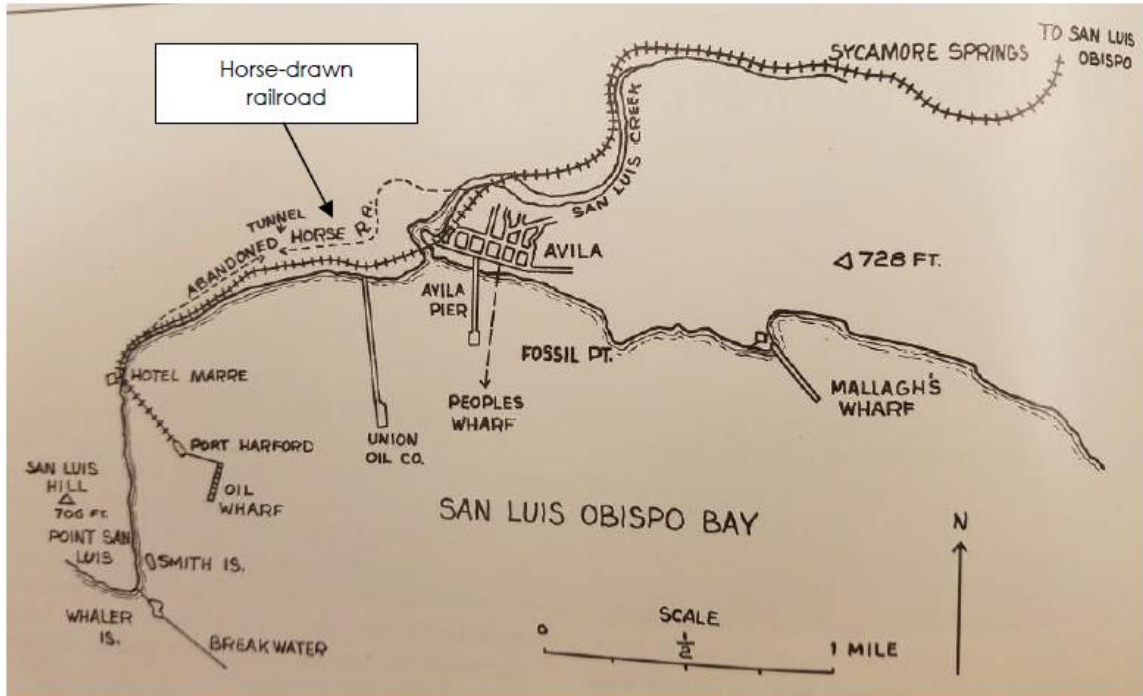
PHA conducted an evaluation of the railway and Marre House, based on criteria established by the National Register of Historic Places, California Register of Historic

Resources and CEQA. Based on the results of their analysis, each of these resources were found eligible for listing (see table below excerpted from their report)

<b>Table 1 Eligibility of Surveyed Resources</b>					
<b>Address</b>	<b>Building, Structure or Feature and Date</b>	<b>Type</b>	<b>Eligible for listing on the California Register</b>	<b>Eligible for listing on the National Register</b>	<b>Notes</b>
<b>Project Parcel</b>			Criteria 1, 2 and 3	Criteria A and B	
<b>APN 076-171-009</b>					
	Right-of-Way for the horse-drawn railway		Yes	Yes	
	Rural/agricultural Landscape		No	No	
<b>Adjacent Parcels</b>					
<b>APN 076-174-022 &amp; 076-174-026</b>	Marre House parcel and its surroundings				
	Marre Ranch House	Spanish Colonial Revival	Yes, 3D	Yes	
	Rural/agricultural Landscape	Vernacular landscape	No	No	

In consideration of these resources, the project has or will include the following:

1. Implement the proposed vernacular design for the lodge and cottages, and coordinate with the project historian to ensure that scale and massing of the development does not unduly impact the setting of the Marre House.
2. Engage the project historian and archaeologist to more clearly delineate the likely route of the horse-drawn railroad and minimize impacts on any remnants of the railroad.
3. Design the access driveway to maintain a semi-rural setting through appropriate paving and curbing types appropriate to the rural setting.
4. Photo-document the subject site, particularly the likely route of the horse-drawn railroad and include in a written report to be donated to a suitable repository.
5. Request permission to photo document the Marre House and setting and prepare a written report prepared by a county-approved historian. Donate the subsequent materials to the SLO County Historical Society or similar suitable repository.
6. Commemorate the history of Marre Ranch with a display (prepared by a county-approved architectural historian) highlighting the Marre Ranch and horse-drawn rail by John Harford.



Map of abandoned horse-drawn railroad.

## J. LIGHTING

Exterior lighting will be used as sparingly as possible, while still providing security and safety for the guests of the hotel. In general, proposed lighting will be hooded and directed downwards. Site lighting along pathways shall be low-level and directed downwards.

The applicant proposes to implement the “Dark Sky and LZ-1” lighting standards with respect to all external lighting installed on or near the bluff edge and adjacent to the area subject to the Open Space Easement.

## K. NOISE

45dB Acoustics was engaged to review the regulatory noise requirements of the San Luis Obispo County General Plan Noise Element for the proposed project.

The existing and future transportation noise impact and the potential noise impacts of on-site operations were acoustically modeled and documented according to three scenarios:

1. Project site with no future development
2. Project site with the built project.
3. Project site with the built project in the year 2037

Noise modeling of the site was based on sound level measurements and average daily traffic volumes on Avila Beach Drive and interior roads. Existing sound level near residential uses in the development are in the range of daytime Leq = 35 dBA to 45 dBA.

The proposed project was found to meet applicable state and local noise restrictions and regulations.

Because of the distance of the site from nearby receptors and because construction noise levels would be less than 75 dBA Leq (8 hours) at all occupied residential / hotel properties, there would be less than significant impact from Project construction. However, to minimize disturbances from construction activity, the following measures will be considered and adopted where deemed feasible:

- Build the structures closest to residential sensitive receptors first. This will then act as a noise barrier for subsequent construction further away.
- Select equipment capable of performing the necessary tasks with the lowest sound level and the lowest acoustic line-of-sight height possible.
- Implement alternatives to the standard backup alarms as feasible. These alternatives include strobe lights or products such as the Brigade Electronics, Inc. Broadband Sound system, which is equally effective while generating a lower noise level.
- Use specially-quieted equipment, such as quieted and enclosed air compressors and properly-working manufacturer-recommended mufflers on all engines.
- Construct enclosures around noise-producing stationary sources such as generators used for night lighting.
- Perform construction vehicle maintenance off site or between 7:00 a.m. and 7:00p.m.
- Place the laydown area as far as possible from the closest noise sensitive receptors.
- Limit the delivery of material (with the exception of concrete) to the hours between 7:00a.m. and 7:00 p.m.

## **L. WATER AND WASTEWATER**

In 1993, the Cottage parcel executed an Agreement with SMMWC to reserve 14-AFY of State Water Project water for future development of the parcel. The applicants have been paying a pro-rata share for the costs of 14 AFY of non-delivered State Water Project (SWP) water.

In preparation for the application to San Luis Obispo County, the applicants engaged Dudek & Associates to work with San Miguelito Mutual Water Company (SMMWC) and provide them with the information necessary to determine that the project could be adequately served.

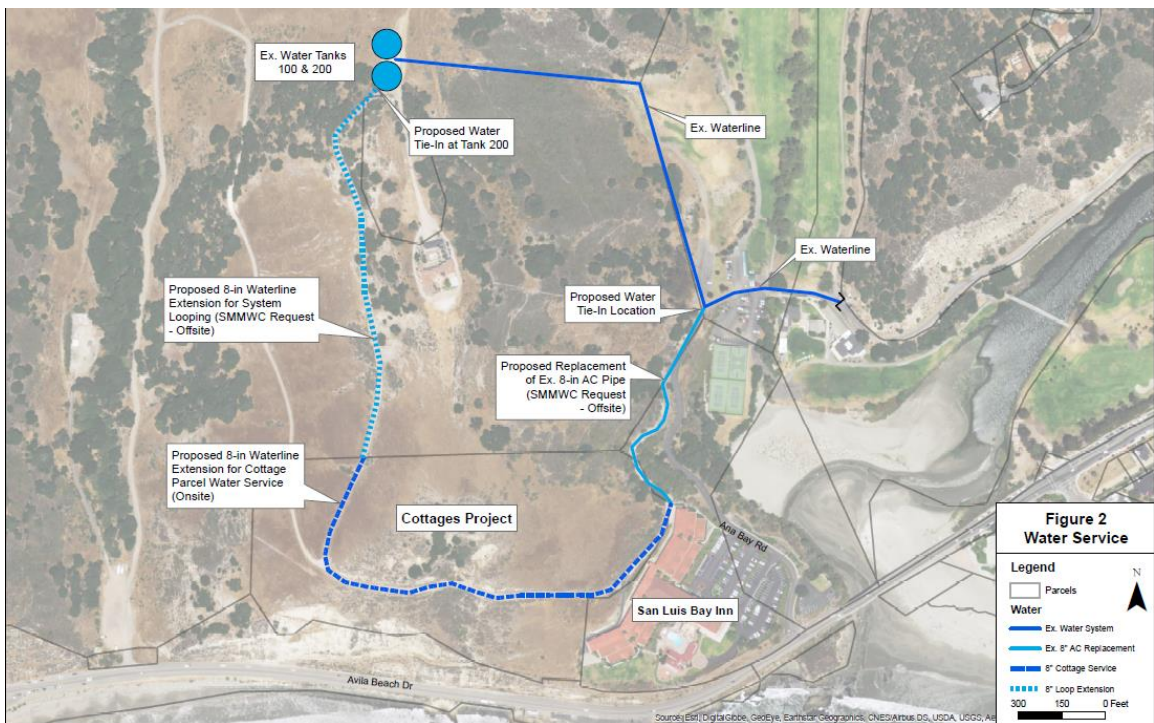


Dudek subsequently prepared a Water Consumption Analysis which projected that the project would use approximately 11.3 Acre-Feet per Year (AFY) of water, when using a grey-water system that would provide ~2.6 AFY of irrigation water. Dudek then prepared a technical memorandum and exhibits which provides specifics on connections to SMMWC water, sewer and (future) reclaimed water lines.

### Potable Water Quality

Due to the projected low water use at the site, a looped system was proposed by SMMWC and will be incorporated into the project. The loop will tie in near a parking lot for the nearby golf course, and replace an existing 8” pipe that runs from that location to the property boundary along Ana Bay Road.

From there, the line will continue on the proposed driveway and then head north offsite along an existing access road, connecting to existing line near water tanks located north of the Marre House (see inset).



Proposed water line loop

The applicant is working with SMMWC to see if there are any alternatives to placing the water line within Marre road.

### Sewer Service

The Cottage Parcel would convey sewage flows east and north through the existing access road via an 8- inch PVC line to the existing SMMWC collection system in Ana Bay Road. The Cottage Parcel sewer line would tie-in to an existing 8-inch sewer line just upstream of Pump Station Number 2.

The applicants are in discussions with SMMWC to pursue an alternative route for sewer that would not require it to be located within the defined archaeologically sensitive areas.

### **Recycled Water Service**

The SMMWC would prefer the Cottage Parcel project to use recycled water, rather than grey water, for the irrigation of onsite landscaping. However, the existing wastewater treatment plant does not currently produce recycled water and, as such, there is no existing transmission main in place. The applicants have committed to SMMWC that, when production and distribution of recycled water appears feasible, they will contribute an appropriate amount of money to that effort, reflecting their impact on the system.

After review the Water Analysis and accompanying technical memorandum, SMMWC issued an Intent to Serve in August 2017.

### **Storm Water Quality**

The project will include sustainable water quality control methods such as bio-swales, and, where possible, porous surfaces which help promote bio-remediation.

Standards from the Regional Water Quality Control Board (RWQCB) require that projects that exceed one (1) acre of exposed earth submit a Storm Water Pollution Prevention Plan (SWPPP). Therefore, a SWPPP will be prepared and kept on-site during grading operations with the goal of minimizing impacts to water quality due to soil erosion and run-off during storm events.

Per the requirements of the RWQCB, a Notice of Intent (NOI) will be filed with the state in conjunction with the application for a grading permit from the County.

A Preliminary Storm Water Control Plan (SWCP) has been prepared by Flowers & Associates with the intention of meeting current requirements for storm water flows. The new requirements stress breaking up storm flows into discrete drainage management areas (DMAs) of a similar type (e.g. porous, non-porous, roof, parking lot) and attempting to bring the water from these DMA's in contact with earth as soon as possible, rather than collecting flows into a drainage pipe. Please see the accompanying SWCP for details on proposed BMPs and information on storm water flows.

## **Impervious**

Total impervious surfaces at the site including building footprints, pool deck, roads, cart and pedestrian paths and the access road is expected to be 145,569 SF which comprises approximately 15% of the project site. Above ground parking spaces are proposed to use permeable pavers.

## **SEPTEMBER 2018 UPDATE**

A Storm Water Control Plan (SWCP) and Drainage study are included with the resubmittal in response to comments from County Public Works and reflect revisions discussed in a meeting with the County.

## **6.0 FINDINGS AND CONCLUSIONS**

The applicants have carefully considered the proposed Development Plan and are proud to present the accompanying application. Significant efforts have been made to ensure that the project will mitigate significant impacts to the on-site and surrounding resources and the community of Avila Beach, while still providing a first-rate experience for guests and visitors of the hotel.

Professional analysis and reports from a variety of consultants were utilized in the design of the plan with respect to architecture, archaeology, paleontology, biology, geology, soils, traffic and circulation, parking, noise, historical resources, soils and storm water drainage.

The proposed hotel is consistent with the intent of the Plan in providing 50 cottage units. From most populated areas, the development will be screened by existing topography. Where views of the development are available, the size, bulk and scale are compatible with the property and, where there are views of structures, they will be framed and accented by proposed landscaping.

The project will utilize progressive construction techniques and BMPs to minimize runoff and erosion and to protect water quality. Monitoring will be in effect during earth movement to protect historic, cultural and paleontological resources.

As the application proceeds forward, the applicant looks forward to productive further engagement with residents of Avila Beach and consultation with representatives of the Northern Chumash.

After analysis of County policies, it is clear to the applicants that the proposed Development Plan can be considered consistent with the goals, policies and intent of the County's General Plan and LCP.

### **Required Findings**

**(i) The proposed project or use is consistent with the Local Coastal Program and the Land Use Element of the General Plan;**

The applicants are firmly convinced that the application meets the goals, policies, and intent of the San Luis Bay Area Plan. Please see the accompany Policy Consistency Analysis.

**(ii) The proposed project or use satisfies all applicable provisions of this title; and**

The proposed development is consistent with the existing zoning and with the stated intent for the parcel within the existing Master Plan for the San Luis Bay Estates. Any substantial impacts have been or will be been mitigated through the project design and/or conditions of approval via recommendations from licensed professionals.

**(iii) The establishment and subsequent operation or conduct of the use will not, because of the circumstances and conditions applied in the particular case, be detrimental to the health, safety or welfare of the general public or persons residing or working in the neighborhood of the use, or be detrimental or injurious to property or improvements in the vicinity of the use; and**

Operation of a hotel is consistent with the intent of the General Plan and Local Coastal Plan for this property and its zoning designation. Traffic impacts from the project have been assumed in the analysis of future traffic buildout. The use will be visitor serving which is consistent with the goals and intent of the Coastal Act. The proposed project has been designed to minimize negative impacts on the surrounding community while providing guests and residents with another opportunity to enjoy the California Coast.

**(iv) The proposed project or use will not be inconsistent with the character of the immediate neighborhood or contrary to its orderly development; and**

The hotel will consist primarily of single-story small bungalows that will meander up the hillsides. Views of these cottages will be screened in many places by existing topography and, where visible, filtered through the proposed landscaping (e.g. an olive grove). The main lodge is also of a modest scale for a resort hotel and its vernacular design will be compatible with the surrounding topography and will not detract from the Marre house. Hotel cottages were considered and approved for this parcel under the Master Plan for the San Luis Bay Estates Master Plan.

**(v) The proposed use or project will not generate a volume of traffic beyond the safe capacity of all roads providing access to the project, either existing or to be improved with the project.**

As hotel cottages have been contemplated in this location for decades, traffic for the cottages has been factored into most estimates of future congestion. Further, the

applicant has supplied a traffic circulation analysis which recommends certain mitigations to ensure that the project will not have a significant impact on surrounding traffic volume and capacity.

**(vi) The proposed use or land division (if located between the first public road and the sea or the shoreline of any body of water), is in conformity with the public access and recreation policies of Chapter 3 of the California Coastal Act.**

This project lies north of Avila Beach road and the Pacific Ocean. Nevertheless, the applicant has studied the Local Coastal Plan with respect to the proposed project and has shown it can be found consistent with the LCP and, by extension, the Coastal Act.

**(vii) Any additional findings required by planning area standards (Part II of the Land Use Element), combining designation (Chapter 23.07), or special use (Chapter 23.08).**

This will be provided later.

### **Policy Consistency**

Please see the accompanying Amendment and Policy Consistency Analysis which follows this project description.

## **Cottages at Avila Beach Development Plan and Master Plan Amendment**

### List of Attachments and Reports:

- Attachment A: Project Plans (Architectural, Landscaping, Civil)
- Attachment B: Historical Resources Report
- Attachment C: Transportation Impact Study
- Attachment D: Environmental Noise Study
- Attachment E: Biological Resource Assessment/Tree Inventory
- Attachment F: Utilities Technical Memorandum
- Attachment G: Soils Engineering Report
- Attachment H: Phase I Environmental Site Assessment
- Attachment I: Water Use Analysis
- Attachment J: 2015 Cultural Resource Study
- Attachment K: 2017 Phase II Archaeological Evaluation
- Attachment L: Paleontological Resource Report
- Attachment M: Title Report dated October 2017
- Attachment N: Intent to Serve from SMMWC dated September 2017
- Attachment O: Preliminary Storm Water Control Plan
- Attachment P: Jurisdictional Determination from ACOE

- Attachment Q: Visual Simulations
- Attachment R: Air Quality Impact Analysis - Greenhouse Gas Analysis
- Attachment S: Geologic Coastal Bluff Evaluation Update October 2016
- Attachment T: Design Booklet from Appleton Partners

### **October 2018 Revisions**

The following revisions to the project have been made, subsequent to the March 2018 submittal.

- An entry kiosk (69 SF net) is proposed along the entry road. It has been located westerly of the boundary of SLO-056. The purpose is to direct visitors, deliveries and persons inadvertently looking for the golf course to their correct destinations.
- A solid waste storage area (288 SF net) was added to an area west of the main lodge.
- It has been clarified that a portion of the project stormwater would be carried west from the project site and connect to an existing stormwater pipe that flows under Avila Beach Road (see plans).
- A previously proposed bridge on the entry road (meant to straighten the road) is no longer proposed. The statistics for grading have been updated to reflect these and other refinements and changes.
- Minor changes to the plans to respond to questions in the SLO County Planning Hold letter.

The following reports have or will be prepared or updated:

- The Transportation Impact Study has been updated to respond to the questions raised by PW staff and to clarify the proposed use of the property for “special events” and other issues. The special events description in the project description has also been updated (see “Special Events” on page 10).
- Storm Water Control Plan and Drainage reports have been updated in response to Public Works review and comments.
- An amendment to the biological assessment has been prepared based upon potential impacts from bringing stormwater westerly towards Wild Cherry Canyon creek.
- An archaeological study is underway to study potential impacts to SLO-056 as a result of widening the road to meet County and CalFire standards and to provide utilities to the project site. CalFire has agreed to accept reductions in width that allows the project to minimize cut.

In addition to the above, the applicant is investigating the following:

- Alternative routes for utilities that would avoid archaeological areas where feasible. The applicant is engaging with San Miguelito Mutual Water Company and a utility service planner.
- A pedestrian trail to Avila Beach Drive and the beach that would utilize an easement across the neighboring property to the west. This trail would be dependent on approval from the adjacent property owner (PG&E).