Cal Poly Water Reclamation Facility Project

EIR Addendum

State Clearinghouse No. 2022090231

Prepared for:

California Polytechnic State University, San Luis Obispo

November 2024

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TABLE OF CONTENTS

Section Page

Figures

Tables

LIST OF ABBREVIATIONS

AB	Assembly Bill
afy	acre-feet per year
Cal Poly	California Polytechnic State University at San Luis Obispo
CEQA	California Environmental Quality Act
CESA	California endangered species act
City	City of San Luis Obispo
County	County of San Luis Obispo
CRPR	California Rare Plant Ranks
CSU	California State University
EIR	Environmental Impact Report
ESA	Endangered Species Act
ITP	Incidental Take Permit
LF	linear feet
mgd	million gallons per day
NPPA	Native Plant Protection Act
PWWF	peak wet-weather flow
RWQCB	Regional Water Quality Control Board
SR 1	State Route 1
US 101	US Route 101
UV	ultraviolet
WDR	waste discharge requirements
WRF Project	Water Reclamation Facility Project

1 INTRODUCTION

This document constitutes an addendum to the Final Environmental Impact Report (EIR) for the California Polytechnic State University at San Luis Obispo (Cal Poly) Water Reclamation Facility Project (WRF Project) (State Clearinghouse #202209023), certified by the California State University (CSU) Board of Trustees in January 2024 (Cal Poly 2024). The project involves construction of an on-campus WRF and a recycled water storage and distribution system to produce and deliver disinfected tertiary recycled water that meets the requirements of California Code of Regulations Title 22 for unrestricted reuse, including safe application to agricultural crops, pastures, and athletic fields on campus.

This EIR Addendum has been prepared to address minor project changes to the WRF Project consisting primarily of a modified location for WRF facilities and realignment of a force main. This section of the EIR Addendum describes the purpose of the addendum, an overview of the WRF EIR, and an updated description of the project, including a discussion of changes to the project compared to what was evaluated in the certified WRF EIR.

1.1 PURPOSE OF AN EIR ADDENDUM

Once an EIR or other California Environmental Quality Act (CEQA) document has been prepared and certified for a project, no additional environmental review is necessary unless certain conditions are met, at which point subsequent review under CEQA may be necessary. Sections 15162-15164 of the CEQA Guidelines define the standards for determining the appropriate level of subsequent environmental review and Section 15164 addresses the specific circumstances requiring the preparation of an addendum to an EIR. If new significant impacts or a substantial increase in the severity of impacts would result, then preparation and circulation of a Subsequent or Supplemental EIR for additional public review is required. However, when it can be determined that neither the proposed changes to the project, changed circumstances, nor new information result in the identification of new significant impacts or the substantial increase in the severity of significant impacts identified in the certified EIR, an addendum to the EIR may be prepared. An addendum does not need to be circulated for public review, but it can be included in or attached to the certified EIR.

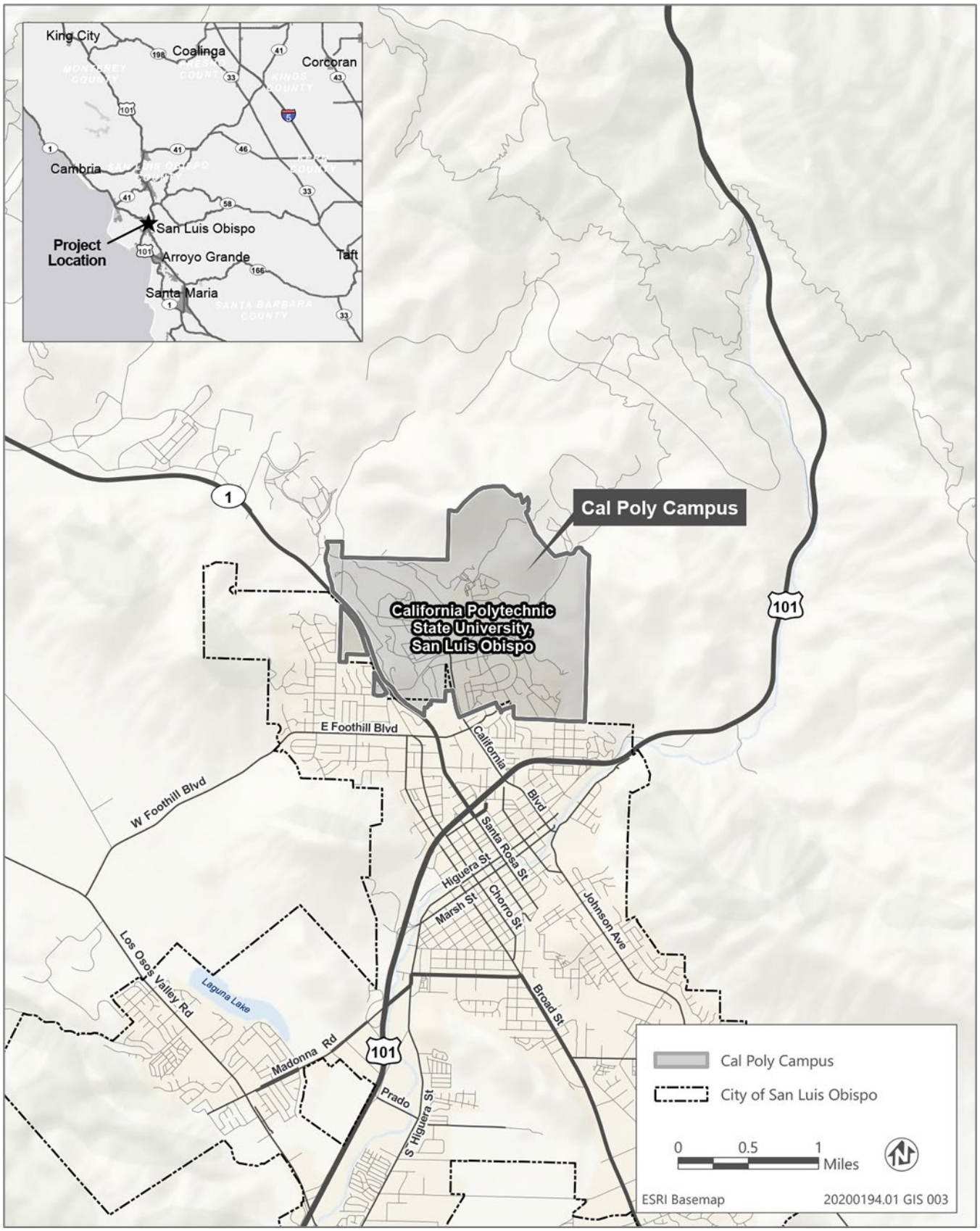
An addendum to the WRF EIR has been determined to be the appropriate environmental documentation for the modified project. The changes to the location of the WRF, realignment of the force main, removal of the upper lift station, and modifications to the swine unit and recycled water storage reservoir would not result in any new significant impacts or impacts of greater severity than contemplated in the WRF EIR. This Addendum to the WRF EIR was prepared pursuant to CEQA Guidelines Section 15164 to address minor project changes since certification of the WRF EIR.

1.2 PROJECT LOCATION

Located in the County of San Luis Obispo (County), the Cal Poly campus covers approximately 3,385 acres abutting the City of San Luis Obispo (City) to the south and west, and open space, ranchland, and public land to the north and east (Figure 1-1). The Cal Poly Campus Master Plan area comprises 1,339 acres of these lands, which consist of the 855-acre main campus and an additional 484 acres consisting of rangeland and steep terrain to the north, northeast, and northwest of the main campus (Figure 1-2) called the San Luis Ranches. Cal Poly also owns another 3,043 acres of noncontiguous rangelands in San Luis Obispo County called the Western Ranches.

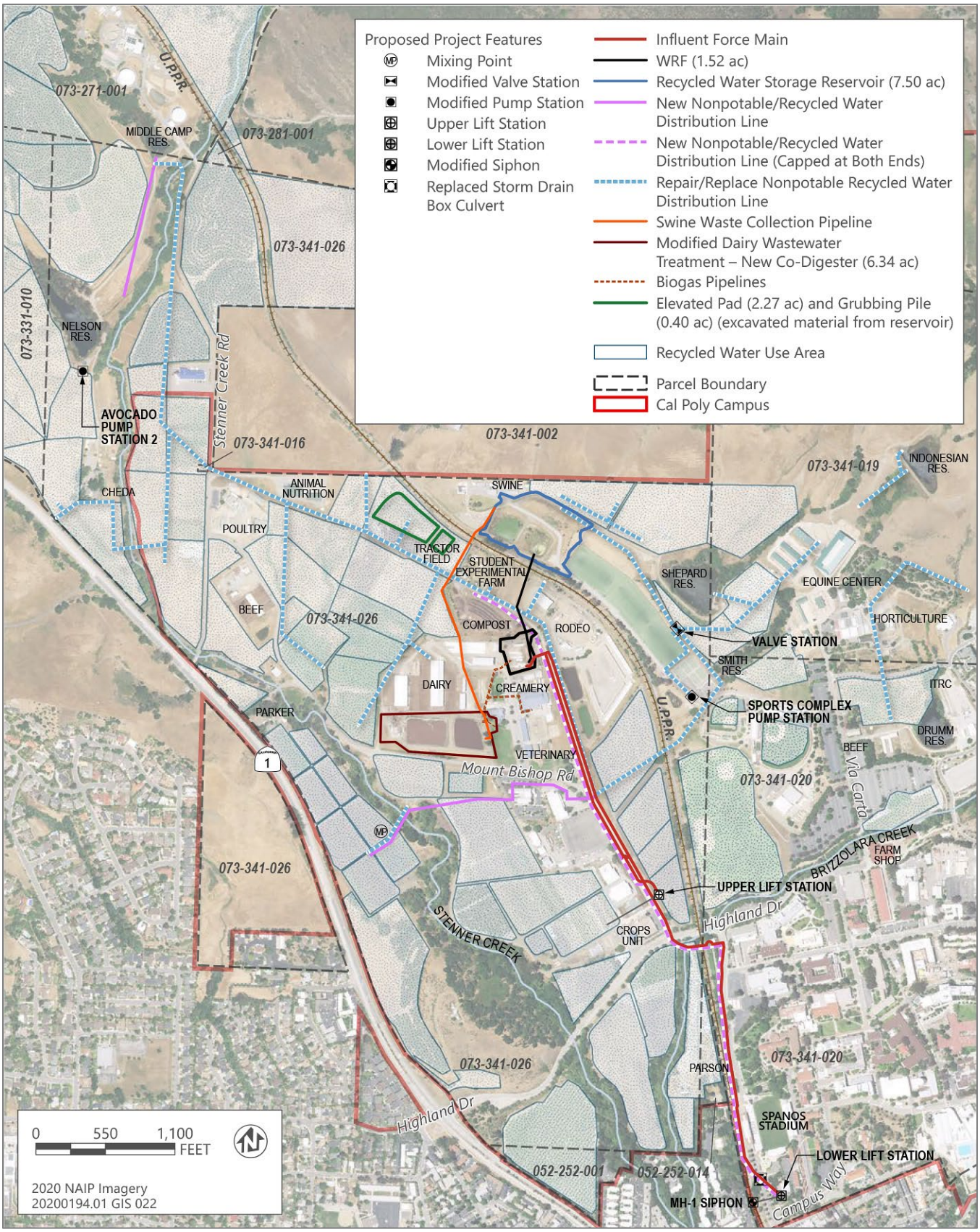
1.3 APPROVED WRF PROJECT AND CERTIFIED EIR

The approved project involves construction and operation of an on-campus WRF and recycled water storage and distribution system to treat a portion of the campus's wastewater and deliver recycled water to campus agricultural and athletic fields for irrigation.



Source: Adapted by Ascent in 2023.

Figure 1-1 Regional Location



Source: Adapted by Ascent in 2023.

Figure 1-2 Approved Project

The approved project was identified as a near-term project in the Campus Master Plan to meet the nonpotable water needs of the Cal Poly campus and free up an equivalent volume of the existing potable water supply from Whale Rock Reservoir to serve the projected potable water demand of the Cal Poly campus in the future (Cal Poly 2019). The previously approved project consists of the following components, which are summarized in more detail below.

- WRF collection system,
- WRF,
- recycled water storage and distribution system,
- dairy and swine unit waste process improvements, and
- utility improvements to support operation of proposed facilities.

Figure 1-2 depicts the previously approved project, which is described below.

1.3.1 Approved WRF Collection System

The approved project would include new collection system components to convey domestic wastewater generated on campus to the WRF. Specifically, the approved project included two new lift stations and force mains to collect and convey wastewater from campus collection points to the WRF (Figure 1-2).

1.3.2 Approved Water Reclamation Facility

The approved WRF was approved to treat up to 0.5 million gallons per day (mgd), peak wet-weather flow (PWWF) and produce an average of 380 acre-feet per year (afy) (339,242 gpd) of disinfected tertiary recycled water that meets the requirements specified in Title 22, Section 60301.230. Disinfected tertiary recycled water is suitable for the surface irrigation of food crops (including all edible root crops where the recycled water comes into contact with the edible portion of the crop), parks and playgrounds, schoolyards, and residential landscaping (Title 22, Section 60304[a]). The approved WRF is designed to include primary, secondary, and tertiary treatment and disinfection processes. The disinfection system was designed to use ultraviolet (UV) light radiation to provide inactivation or removal of pathogens.

The WRF design meets water reclamation requirements and waste discharge requirements (WDRs) established by the Central Coast Regional Water Quality Control Board (RWQCB) and incorporates the required reliability features specified in CCR Title 22 Sections 60341–60355 to ensure the safe production and distribution of recycled water for unrestricted reuse. All treatment processes are designed to be covered or housed in the WRF building include odor control technology.

1.3.3 Approved Recycled Water Storage and Distribution System

Recycled water produced by the WRF was approved for storage in a new recycled water storage reservoir with a capacity of approximately 120 acre-feet and distribution to campus agricultural and athletic fields through new and existing distribution pipelines. From the storage reservoir, the approved project included pumping of recycled water to the existing nonpotable water distribution system and conveyed to agricultural and athletic fields around campus (see Figure 1-2). Other approved improvements to the system include installing additional storage at an existing pump station (Avocado Pump Station 2) near Nelson Reservoir to boost line pressure to serve the fields north of the reservoir and upgrading or installing new valves to control recycled water delivery.

1.3.4 Approved Dairy and Swine Waste Process Improvements

The approved project included an anaerobic co-digester to process liquid wastewater from the dairy unit. The anaerobic process was approved to take place in a sealed, covered pond reactor. Microbes inside a sealed, covered pond break down the waste into biogas, liquid, and solid end-products. Collected biogas is then contained, and

stored in the sealed, covered pond, and then removed periodically and conditioned as a renewable fuel for use in gas heaters to support the co-digester operation and for power generation to support agricultural operations.

1.3.5 Approved Anaerobic Co-Digester and Cogeneration Facility

The approved project includes modification to the existing eastern dairy pond to convert it into an anaerobic (covered) co-digester to treat dairy. The co-digester effluent, or digestate was designed to go through a solids/liquid separation process following digestion, ultimately resulting in wastewater and dewatered solids. Under this design, the treated wastewater would be conveyed to the adjacent western dairy pond for storage and use. A flare was approved to burn any excess biogas not used for energy production.

1.3.6 Approved Campus Master Plan

The Campus Master Plan is a long-range planning document that focuses on 1,339 acres of the Cal Poly campus and provides development direction for each of the four distinct subareas of the main campus, described above. The plan addresses academic program demand, physical and environmental constraints and opportunities, and capital and operating budget requirements to support a future student enrollment of an approximate 25,000 headcount (22,500 net full-time-equivalent students [FTES]) (Cal Poly 2019). The WRF was included in the Master Plan and its location was modified as part of the WRF EIR. Figures 1-3a and 1-3b show the approved Campus Master Plan and illustrate the changes that would occur under the plan.

1.4 PROJECT OBJECTIVES

Consistent with, and in furtherance of, the Campus Master Plan, the objectives of the WRF Project are to:

- maximize use of Whale Rock Reservoir water supply allocation to meet potable water demand associated with Campus Master Plan buildout;
- provide reliable, scalable, high-quality recycled water to serve existing and planned on-campus agricultural irrigation and meet other nonpotable campus water demands;
- supply water in a manner that aligns with Cal Poly's climate action plan and promotes the use of recycled water in support of CSU's 2022 Sustainability Policy;
- maximize Cal Poly water supply resilience to drought conditions;
- provide additional wastewater treatment capacity to accommodate increased domestic wastewater generation associated with Campus Master Plan buildout;
- provide domestic wastewater treatment and recycled water storage facilities that minimize odor issues, minimize energy demand, and limit disturbance to natural lands;
- maximize cost-effectiveness of water supply, wastewater, and recycled water services required to serve Campus Master Plan buildout; and
- provide students with additional hands-on learning environments and opportunities.

1.5 MODIFIED PROJECT DESCRIPTION

Under the modified project, the WRF would be located on vacant lands northeast of the recycled water storage reservoir, rather than north of the creamery and west of the rodeo. With this modified design, swine waste would be collected in two manure storage tanks, rather than conveyed to the approved storage pond for treatment with dairy waste. In addition, based on further analyses, the upper lift station would be eliminated from the project because the lower lift station would be adequate to address project needs for conveyance. Figure 1-4 depicts the modified project.

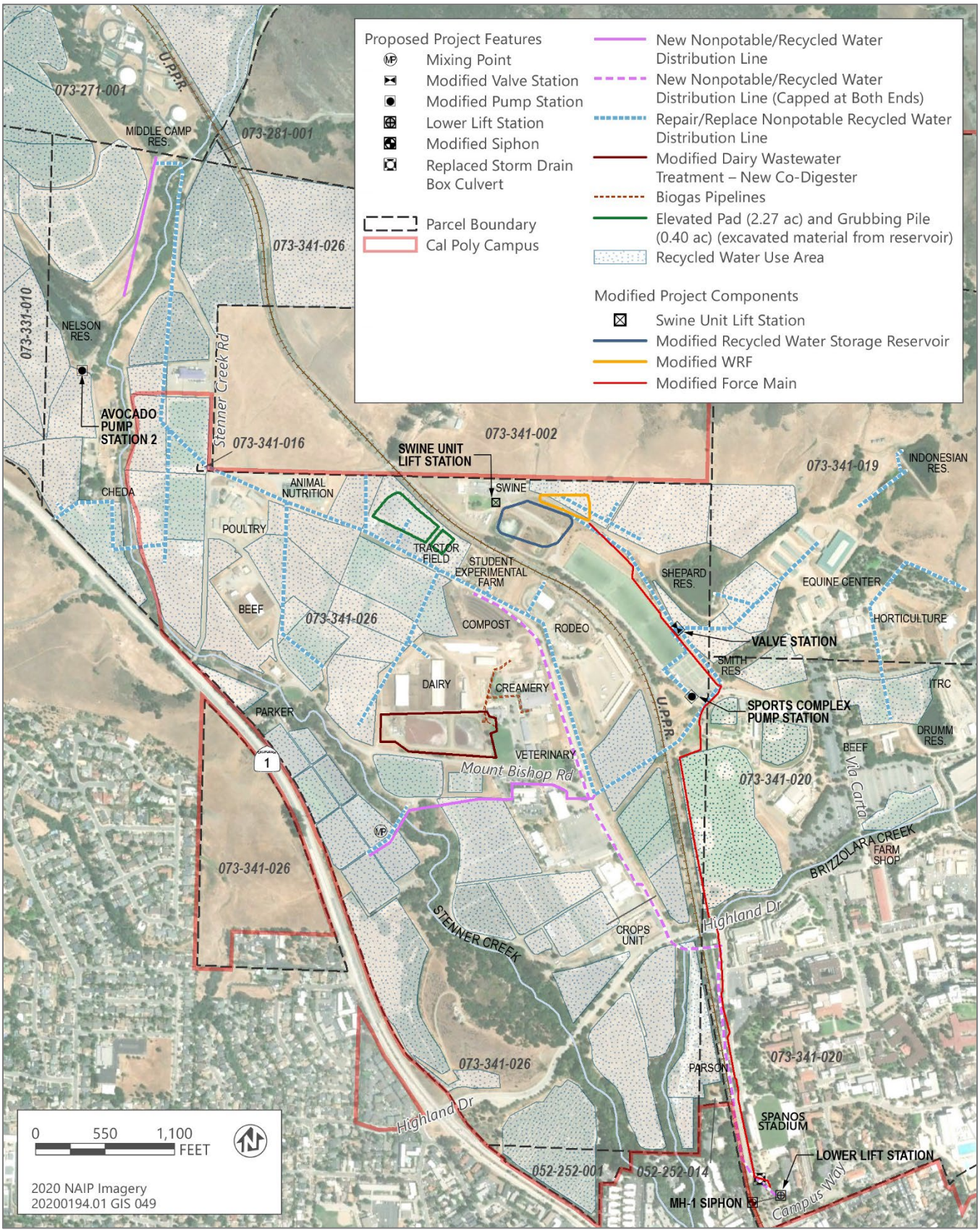
Project construction would require the same types of equipment and occur along a similar timeline under the modified project as under the approved project.

Source: Cal Poly 2024.

Figure 1-3a Cal Poly Master Plan Map Legend

Source: Cal Poly 2024.

Figure 1-3b Cal Poly Master Plan Map



Source: Adapted by Ascent in 2023.

Figure 1-4 Modified Project

1.5.1 Modified WRF

Under the modified project, the WRF is proposed to occupy approximately 1.5 acres in the northeast corner of the Swine Unit on a site currently used for swine pens and agricultural pasture (see Figure 1-4), rather than the northeast corner of the Dairy Unit in an area used for feed, compost, and miscellaneous agricultural equipment storage. The College of Agriculture, Food, and Environmental Sciences manages the Swine Unit and would redesign the swine pens to make room for the WRF. Under the modified project, the WRF would be accommodated with a smaller footprint (approximately 1.1 acres) than required for the approved project (1.5 acres). The capacity and treatment processes would remain the same under the modified project as the approved project.

1.5.2 Modified Recycled Water Storage Reservoir

Under the modified project, the recycled water storage reservoir would have the same capacity as under the approved project (i.e., 120 acre-feet) and in the same location: north of the proposed WRF on land currently occupied by two swine wastewater ponds that serve the existing Swine Unit (see Figure 1-4). However, compared to the approved project, the modified recycled water storage reservoir would require less capacity, thus requiring a smaller quantity of excavated materials (25 feet compared to 50 feet deep under the approved project) and smaller overall footprint (approximately 3.3 acres compared to 1.5 under the approved project). Consistent with the design of the recycled water storage reservoir for the approved project, the reservoir under the modified project would be lined in accordance with State Water Resources Control Board requirements and would have earthen berms to a maximum height of 20 feet aboveground, including a minimum of 2 feet of freeboard.

1.5.3 Modified Swine Unit Facilities

Under the modified project, a co-digester would be constructed at the dairy unit to serve only dairy waste (i.e., not dairy and swine waste). Under the modified project, a lift station would be constructed to collect swine unit waste and deliver it to an underground influent equalization tank. Pipes, valves, and a pump would be constructed to connect the new waste containment structures to the existing Swine Unit facilities. Decommissioning of the existing Swine Unit wastewater storage ponds and construction of the recycled water storage reservoir would occur over a period of approximately 22 weeks.

1.5.4 Modified Force Main

Under the modified project, the force main, depicted in Figure 1-4, would be located primarily within roadways except for an approximately 1800-foot-long segment of the lower lift station force main from Highland Drive to Sports Complex Road. Along California Boulevard, the force main would continue to the intersection with Highland Drive, where the force main from the lower lift station would cross Highland Drive and would continue over the top of Brizzolara Creek culvert, and continues north along between the playfields and the UPRR to the Sports Complex Road. This alignment reduces the number of UPRR undercrossings from four in the approved project, to two under the modified project. Under the modified project, the undercrossings would be constructed at the following locations:

- new UPRR crossing north of Highland Drive to collect sewage north of Brizzolara Creek (type: gravity), and
- new UPRR crossing to accommodate the interconnecting pipeline between the WRF, the reservoir and the new recycled water distribution pipeline (type: pumped).

1.5.5 Summary of Project Modifications

As discussed above, the modified project involves changes to the layout of the previously approved WRF Project. Specifically:

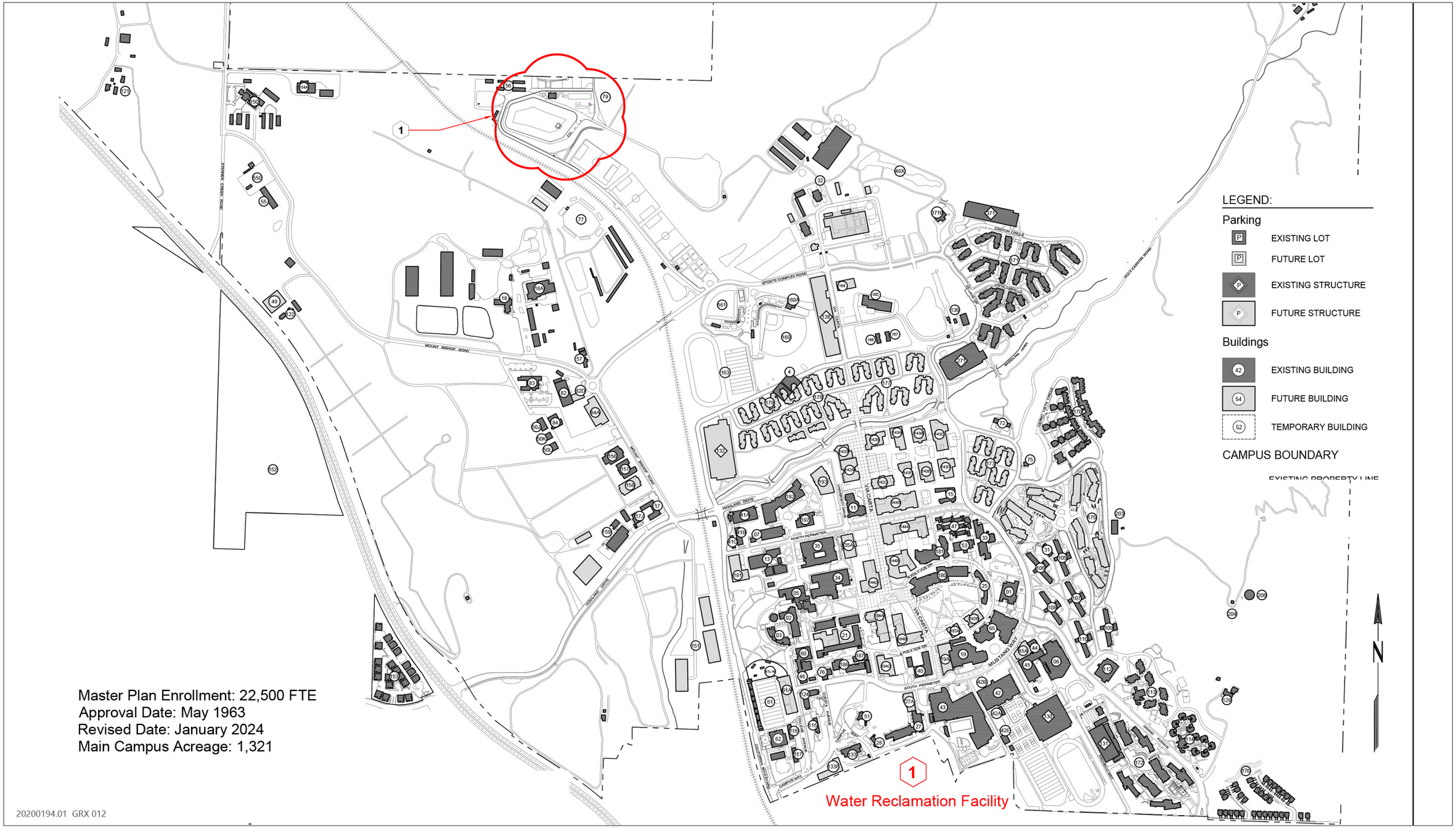
- Realigned force main;
- Elimination of the upper lift station;
- Installation of a swine unit lift station;
- Modified WRF location; and,
- Modifications to the recycled water storage reservoir.

1.6 PROJECT APPROVALS

Other project elements, as approved in the WRF EIR, would remain the same. Cal Poly SLO would be responsible for approval of the project modifications and amended Campus Master Plan approval (Figure 1-5a and 1-5b). All permits and other approvals would remain consistent with those discussed in the WRF EIR.

Source: Cal Poly 2024.

Figure 1-5a Cal Poly Master Plan Map Legend – Modified Project



Source: Cal Poly 2024.

Figure 1-5b Cal Poly Master Plan Map – Modified Project

2 ENVIRONMENTAL ANALYSIS

As indicated in Section 1.1, "Introduction," an addendum to the WRF EIR has been determined to be the appropriate environmental documentation for the modified project. The WRF itself was contemplated as part of the Campus Master Plan and Master Plan EIR. This addendum to the WRF EIR was prepared pursuant to State CEQA Guidelines Section 15164 to address minor project changes and changed circumstances identified since the EIR was certified.

This chapter evaluates the environmental implications of the minor project changes and changed circumstances. As demonstrated in each resource topic discussion in Sections 2.1 through 2.5, this chapter concludes that the project changes and changed circumstances would not result in new significant impacts or substantial increases in the severity of impacts previously identified in the WRF EIR. Overall, the modified project is within the scope of the project covered by the WRF EIR. A subsequent or supplemental EIR is not required.

Each environmental resource area analyzed in the WRF EIR is discussed in further detail below.

2.1 AESTHETICS

Section 3.2, "Aesthetics," of the WRF EIR evaluated the impact of the approved project on aesthetics (pages 3.2-1 through 3.2-18 of the WRF EIR). The WRF EIR concluded that the approved project would have a less-than-significant impact on scenic vistas, visual character and quality of public views (Impact 3.3-1), and scenic resources within a state scenic highway (Impact 3.3-2). The WRF EIR concluded that the approved project would have a less-than-significant impact on lighting and glare with implementation of Mitigation Measures 3.2-3a and 3.2-3b (Impact 3.3-3).

2.1.1 Scenic Vistas and Visual Character and Quality of Public Views

Impact 3.2-1 in the WRF EIR evaluates the potential for the approved project to result in a substantial adverse effect on a scenic vista or substantially degrade the existing visual character or quality of public views of the site and its surroundings (pages 3.2-15 and 3.2-16 of the WRF EIR). The approved project site is located in the northwestern portion of the Cal Poly campus, which consists of open space containing grasslands and riparian vegetation, agricultural fields, and scattered industrial development. The approved project site is not located in areas of high viewer sensitivity. Construction activities would be visible for a temporary period and would generally be obscured by intervening topography, development, and vegetation. Once constructed, the approved project components would be minimally visible from other areas on campus and would be compatible with the visual character and quality of the existing uses, facilities, and infrastructure in the vicinity of the approved project site. The WRF EIR concluded that the approved project would have a less-than-significant impact related to substantial adverse effects on scenic vistas and degradation of existing visual character or quality of public views.

As described in Section 1.5.4, "Summary of Project Modifications," the modified project would result in the following changes to the approved project: realignment of the force main, elimination of the upper lift station, installation of a swine unit lift station, relocation of the WRF, and modifications to the recycled water storage reservoir. The modified project would not change the duration of construction or the types of equipment and activities proposed under the approved project. Once constructed, the force main would be located primarily within roadways and would not be noticeable within public viewsheds along the modified alignment.

The modified project would introduce a new permanent aboveground feature that was not previously proposed within this viewpoint under the approved project (i.e., relocated WRF). The relocated WRF would be introduced in an area currently occupied by swine pens and an agricultural pasture(see Viewpoint 2, depicted in the WRF EIR). Consistent with the approved project, these aboveground features would have similar height and massing and would be constructed of similar materials as existing agricultural structures and other buildings in the vicinity. Furthermore, although these aboveground features would be visible from Sports Complex Road, they would be obscured from other public viewpoints due to intervening topography, buildings and landscaping. As a result, the project components would be minimally visible from other areas on campus and compatible with the existing visual quality and character of the surrounding area.

Therefore, the modified project would not result in new or more severe impacts than were identified in the WRF EIR with regard to scenic vistas and visual character. No substantial change from the previous conclusions in the WRF EIR would occur.

2.1.2 Scenic Resources within a State Scenic Highway

Impact 3.2-2 in the WRF EIR evaluates the potential for the approved project to damage scenic resources within a state scenic highway (pages 3.2-16 and 3.2-17 the WRF EIR). The previously approved WRF location is approximately 0.5 mile east of State Route 1 (SR 1), the nearest designated state scenic highway, and 1.6 miles northwest of US Route 101 (US 101), the nearest eligible state scenic highway. The WRF EIR states that the varied topography and existing development and vegetation shield views of the approved WRF location from SR 1 and US 101. The impact on scenic resources within a scenic highway was found to be less than significant.

As described in Section 1.5.5, "Summary of Project Modifications," the modified project would involve the following changes to the approved project: realignment of the force main, elimination of the upper lift station, installation of a swine unit lift station, relocation of the WRF, and modifications to the recycled water storage reservoir. Although developed of the modified project would result in permanent aboveground features, the varied topography and existing development and vegetation between SR 1 and proposed aboveground project features (i.e., modified WRF and recycled water storage facility) would not be visible to motorists traveling along US 101, due to the topography of the area and existing development. Furthermore, these features would appear similar to existing uses and would be designed to preserve views of the surrounding area. For the reasons described above, construction and operation of the modified project would not damage scenic resources within a state scenic highway.

Therefore, the modified project would not result in new or more severe impacts than were identified in the WRF EIR with regard to scenic resources within a state scenic highway. No substantial change from the previous conclusions in the WRF EIR would occur.

2.1.3 Light and Glare

Impact 3.2-3 in the WRF EIR evaluates the potential for the approved project to create a new source of substantial light or glare that would adversely affect day or nighttime views (pages 3.2-17 and 3.2-18 of the WRF EIR). The approved project site is surrounded by rural and agricultural land uses that have limited sources of light and glare. All construction activities for the approved project would occur during the day and would not require additional temporary nighttime lighting. Once constructed, the approved project would introduce new buildings and facilities that would require permanent security lighting to support nighttime operation and maintenance activities. Some project components, including the proposed lift stations, are located in areas where nighttime lighting already exists. However, the proposed WRF, co-digester/cogeneration facility, and recycled water storage reservoir are located in areas with low levels of nighttime lighting; therefore, these project components would have potential to adversely affect nighttime views. The WRF EIR concluded that the approved project would have a less-than-significant impact on lighting and glare with implementation of Mitigation Measures 3.2-3a and 3.2-3b, which require the use of nonreflective surfaces and directional lighting with shielded and cut-off type light fixtures that minimize light spillage and skyglow.

As described in Section 1.5.5, "Summary of Project Modifications," the modified project would result in the following changes to the approved project: realignment of the force main, elimination of the upper lift station, relocation of the WRF, and modifications to the recycled water storage reservoir. Similar to the approved project, all construction activities for the modified project would occur during the day and would not require the use of temporary nighttime lighting. Realignment of the force main would have no effect on light and glare because the force main would be located underground and does not require lighting to support operation activities. Elimination of the upper lift station would eliminate the associated outdoor lighting, thereby reducing potential nearby light and glare effects. New permanent lighting would be installed to support nighttime operation and maintenance activities associated with the relocated WRF and modified recycled water storage reservoir; however, the lighting intensity would be consistent with that of the approved project. In addition, the modified WRF would be located further from public access points (i.e.,

from campus roadways) than the approved project; thus, lighting would be further shielded from view than the approved project. Further, these facilities would be located between the Swine Unit and Upper Sports Complex, where nighttime lighting already exists. While the modified project would reduce potential effects of light or glare, the potential sensitivity (including from on-campus locations) due to elimination of the upper lift station and relocation of the WRF, additional lighting at the project site would continue to result in significant impacts. Thus, adopted Mitigation Measures 3.2-3a and 3.2-3b would apply. Consistent with the findings of the WRF EIR, the modified project would result in a less-than-significant impact on light and glare with implementation of mitigation measures.

Therefore, the modified project would not result in new or more severe impacts than were identified in the WRF EIR with regard to light and glare. No substantial change from the previous conclusions in the WRF EIR would occur.

2.2 ARCHAEOLOGICAL, HISTORICAL, AND TRIBAL CULTURAL RESOURCES

Section 3.3, "Archaeological, Historical, and Tribal Cultural Resources," in the WRF EIR evaluated the potential impacts of the approved project on known and unknown cultural resources (page 3.3-1 through 3.3-25 of the WRF EIR). The WRF EIR concluded that the approved project would have a less-than-significant impact on historic resources (Impact 3.3-1) and disturbance of human remains (Impact 3.3-3). Mitigation Measures 3.3-2a, 3.3-2b, and 3.3-2c were adopted to reduce impacts on previously undocumented significant archaeological resources to a less-than-significant level (Impact 3.3-2) and Mitigation Measures 3.3-4a, 3.3-4b, 3.3-4c, and 3.3-4d were adopted to reduce impacts on tribal cultural resources to a less-than-significant level (Impact 3.3-4).

Due to the length of time since the records search was conducted for the WRF Project, a new records search was completed at the Central Coast Information Center at the Museum of Natural History, Santa Barbara on September 24, 2024. The records search did not identify any additional built environment or archaeological sites beyond those previously identified and analyzed in the WRF EIR. Because the modified project involves changes to the layout, an archeological survey was completed to address areas outside the previously approved project boundaries.

2.2.1 Historical Resources

As described in Impact 3.1-1 in the WRF EIR, background research revealed a segment of the Southern Pacific Railroad (P-40-041327) within the project site. The railroad has been recommended eligible for NRHP/CRHR as a contributing element of a proposed historic district consisting of the historic San Francisco to Los Angeles Route of the Southern Pacific Railroad and is therefore a resource under CEQA. Protective measures for this historical resource have been incorporated into the design of the project. Under the modified project, the force main would be aligned beneath the rail line at two locations, which reduces the number of under crossings compared to the approved project (i.e., four locations). Because undercrossing would be accomplished via jack and bore techniques, the historical significance of the railroad would not be affected, and impacts would remain less than significant under the modified project.

Therefore, the modified project would not result in new or more severe impacts than were identified in the WRF EIR with regard to historical resources. No substantial change from the previous conclusions in the WRF EIR would occur.

2.2.2 Archeological Resources

Impact 3.3-2 in the WRF EIR addresses potential effects on archaeological resources based on record search and a pedestrian survey of the project site. While no unique archaeological resources are located within the project site, the WRF EIR indicated that project-related ground-disturbing activities could result in discovery of or damage to as-yet-undiscovered archaeological resources as defined in State CEQA Guidelines Section 15064.5. With implementation of Mitigation Measures 3.3-2a through 3.3-2c, which require site-specific surveys, documentation, and protection of archaeological resources (where possible), archaeological impacts would be reduced to a less-than-significant level.

The results of the records search and pedestrian survey did not reveal the presence of archeological resources in the WRF project area that could be affected by implementation of the modified project. However, the potential to disturb previously undiscovered archeological resources remains a potentially significant impact under the modified project. Thus, Mitigation Measures 3.3-2a, 3.3-2b, and 3.3-2c of the WRF EIR would continue to apply to the modified project. These mitigation measures would reduce impacts on archaeological resources to a less-than-significant level by requiring pre-construction surveys, training of construction personnel, as well as protection, identification, and assessment of any uncovered archaeological material.

Therefore, the modified project would not result in new or more severe impacts than were identified in the WRF EIR with regard to archeological resources. No substantial change from the previous conclusions in the WRF EIR would occur.

2.2.3 Human Remains

As discussed under Impact 3.3-3 in the WRF EIR, no human remains are known to occur within the boundaries of the project site. Nevertheless, the potential for the project to disturb human remains, including those interred outside of formal cemeteries, during construction of the WRF project cannot be precluded. As noted in the WRF EIR, any discovery and subsequent treatment would be performed in compliance with California Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097, which prescribe procedures to avoid or minimize the disturbance of discovered human remains and to appropriately treat any remains.

Because the modified project would include areas of disturbance outside of the approved project footprint, a records search was conducted, and a pedestrian survey was performed to ensure that the modified project components were assessed. The results of the records search and pedestrian survey did not reveal the presence of human remains in the WRF project area. However, ground-disturbing construction activities could uncover previously unknown human remains. Through compliance with Public Resources Code and Health and Safety Code requirements, impacts on human remains associated with the modified project would continue to be less than significant.

Therefore, the modified project would not result in new or more severe impacts than were identified in the WRF EIR with regard to disturbance of human remains. No substantial change from the previous conclusions in the WRF EIR would occur.

2.2.4 Tribal Cultural Resources

Regarding potential impacts to tribal cultural resources, no tribal cultural resources meeting the regulatory criteria (Public Resources code Section 5024.1(c)) were identified in the footprint of the approved project, as indicated in Impact 3.3-4 in the WRF EIR. However, because the consulting tribes have expressed that the area is sensitive for tribal cultural resources and because portions of the project are located in the zone of archaeological sensitivity, ground-disturbing activities during project construction could uncover and damage or destroy previously unknown tribal cultural resources.

Implementation of adopted Mitigation Measures 3.3-4a, 3.3-4b, 3.3-4c, and 3.3-4d would reduce potential impacts related to tribal cultural resources to a less than significant level by requiring a cultural resources awareness training program, the performance of professionally accepted and legally compliant procedures for the discovery and protection of previously undocumented archaeological resources and, in the case of a discovery, preservation in place and/or culturally appropriate treatment as directed by a tribal representative if significant artifacts are recovered.

The modified project expands the area of disturbance compared to the approved project. Although the consultation process pursuant to AB 52 has been completed, it should also be noted that the Salinan Tribe of Monterey and San Luis Obispo Counties, the Northern Chumash Tribal Council, and yak titᵛu titᵛu yak tiłhini (ytt) (a Northern Chumash tribe) have historically coordinated and continue to coordinate with Cal Poly regarding on-campus development and potential impacts to tribal cultural resources. Cal Poly will continue to coordinate with both tribes in accordance with CEQA requirements to avoid damaging tribal cultural resources. If Cal Poly determines that a subsequent project may cause a substantial adverse change to a tribal cultural resource, and measures are not otherwise identified in the consultation process, new provisions in the PRC describe measures that, if determined by the lead agency to be

feasible, could be implemented to reduce potential effects of campus-related development on tribal cultural resources. Although no tribal cultural resources were identified through Assembly Bill (AB) 52 compliance for the WRF EIR, compliance with PRC Section 21080.3.2 and Section 21084.3 (a) and Cal Poly's continuing notification of the aforementioned tribes of all projects would provide an opportunity to avoid or minimize the disturbance of any newly discovered tribal cultural resources, and to appropriately treat any yet unknown remains that could be discovered.

Therefore, the modified project would not result in new or more severe impacts than were identified in the WRF EIR with regard to tribal cultural resources. No substantial change from the previous conclusions in the WRF EIR would occur.

2.3 BIOLOGICAL RESOURCES

Section 3.4, "Biological Resources," in the WRF EIR evaluated the common and sensitive resources that could be affected by implementation of the approved project (page 3.4-1 through 3.4-42). The WRF EIR identified that impacts to wildlife movement were less than significant and no mitigation was required to address this impact (Impact 3.5-5). The WRF EIR identified significant or potentially significant impacts related to special-status plants (Impact 3.4-1), special-status wildlife (Impact 3.4-2), sensitive natural communities and riparian habitat (Impact 3.4-4), and wetlands and other waters (Impact 3.4-5). Mitigation measures were adopted to reduce impacts to special-status plants, special-status wildlife, sensitive natural communities and riparian habitat to a less-than-significant level.

The analysis of impacts to special-status plants and special-status wildlife updates and refines the analysis of the WRF EIR, using California Natural Diversity Database and California Native Plant Society Rare Plant Inventory record searches of the Morro Bay North, Morro Bay South, Port San Luis, Atascadero, San Luis Obispo, Lopez Mountain, Arroyo Grande Northeast, Pismo Beach, and Santa Margarita U.S. Geological Survey 7.5-minute quadrangles conducted in September of 2024 (CNDDB 2024; CNPS 2024).

2.3.1 Special-Status Plants

As discussed under Impact 3.4-1 in the WRF EIR, the approved project involves conversion of undeveloped suitable habitats for several special-status plants, which may result in a significant effect. Implementation of adopted Mitigation Measures 3.4-1a through 3.4-1i would ensure that impacts on special-status plants would be avoided, minimized, and compensated for such that impacts on special-status plants would be reduced to a less than significant level.

Based on the updates to the databases that occurred following the certification of the WRF EIR (CNDDB 2024; CNPS 2024), three additional special-status plants were evaluated for the potential to occur within the modified WRF project site (Table 1.4-1) that were not previously evaluated in the WRF EIR. As shown in Figure 2-1, the modified project site contains the same vegetation and habitat types described in Section 3.4.2 of the WRF EIR, and the potential for these three species to occur was evaluated based on those landcover types.

Table 1.4-1 Additional Special-Status Plant Species Known to Occur in the Vicinity of the Project site and Their Potential for Occurrence in the Project site

Species	Listing Status[1] Federal	Listing Status[1] State	CRPR	Habitat	Potential for Occurrence[2]
Hutchinson's larkspur *Delphinium hutchinsoniae*	—	—	1B.2	Broadleafed upland forest, chaparral, coastal prairie, coastal scrub. On semi-shaded, slightly moist slopes, usually west facing, 50–1,760 feet in elevation. Blooms March–June. Perennial.	May Occur: The non-native annual grassland within the project site may provide habitat for this species.
Blushing layia *Layia erubescens*	—	—	1B.2	Coastal dunes, coastal scrub Coastal dunes, coastal scrub. Prefers loose, fine sand of stabilized dunes and sandhills, 35–810 feet in elevation. Blooms March–June. Annual.	Not Expected to Occur: Sand dunes and coastal scrub on sandy soils, which provide habitat for this species are not present within the project site.

Species	Listing Status[1] Federal	Listing Status[1] State	CRPR	Habitat	Potential for Occurrence[2]
Jones' bush-mallow *Malacothamnus jonesii*	—	—	1B.2	Chaparral, cismontane woodland, 525–2,710 feet in elevation. Blooms April–October. Perennial.	Not Expected to Occur: The chaparral and woodland habitat that is required for this species is not present within the project site.

Notes: CRPR = California Rare Plant Rank; CEQA = California Environmental Quality Act; ESA = Endangered Species Act; NPPA = Native Plant Protection Act

1 Legal Status Definitions

California Rare Plant Ranks (CRPR):

1B Plant species considered rare or endangered in California and elsewhere (protected under CEQA, but not legally protected under ESA or CESA).

CRPR Threat Ranks:

0.2 Moderately threatened in California (20-80% occurrences threatened; moderate degree and immediacy of threat)

2 Potential for Occurrence Definitions

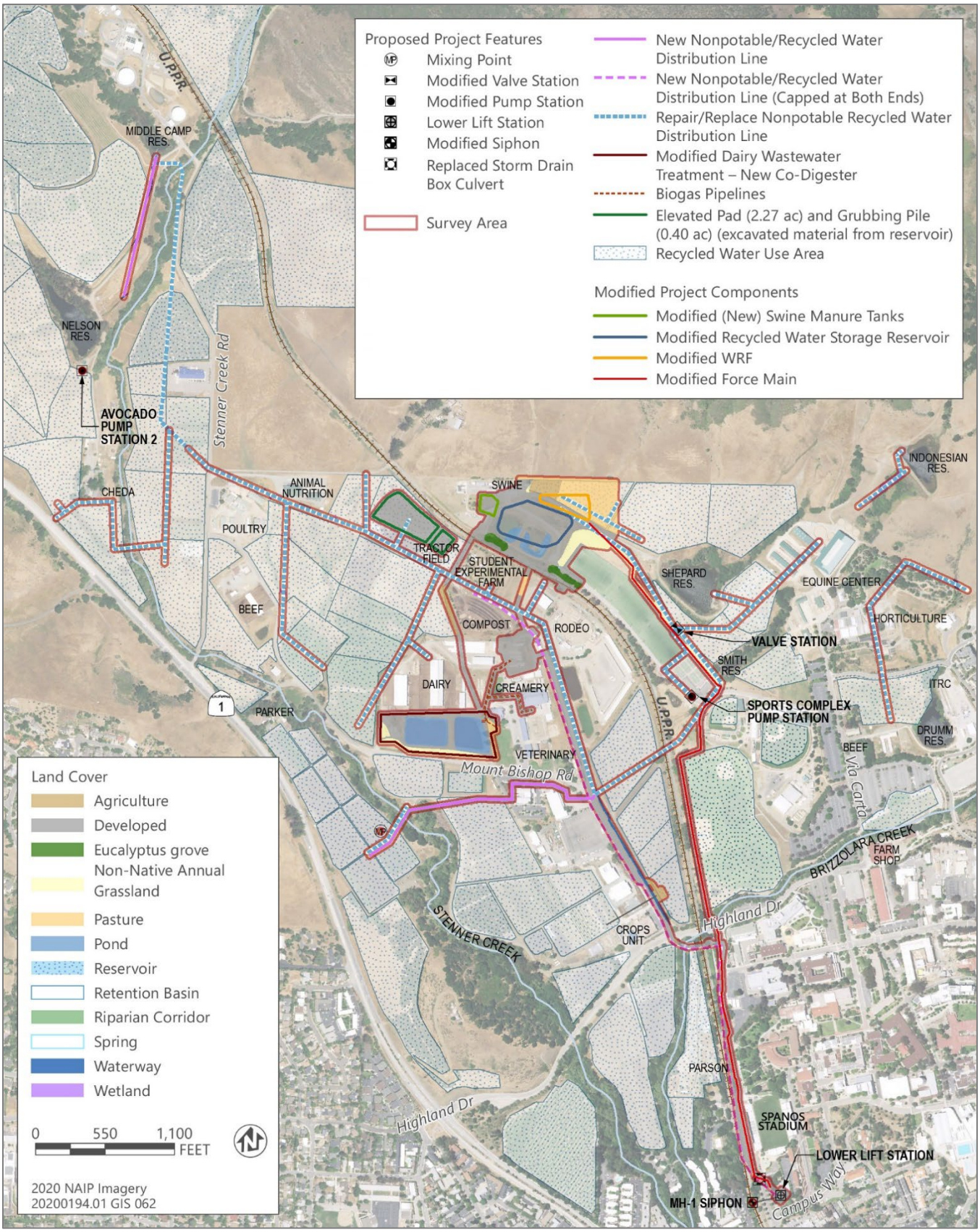
Not expected to occur: Species is unlikely to be present because of poor habitat quality, lack of suitable habitat features, or restricted current distribution of the species.

May occur: Suitable habitat is available and there have been nearby recorded occurrences of the species.

Sources: CNDDB 2024; CNPS 2024.

The modified location of the force main would occur within annual grassland habitat that may be suitable for Hutchinson's larkspur (*Delphinium hutchinsoniae*) and other special-status plant species; however, the modified location of the WRF would occur within existing development and a swine unit pasture that would not be suitable for Hutchinson's larkspur or other special-status plant species. In addition, Hutchinson's larkspur may occur within the portions of the modified project where recycled water would be applied to areas that currently do not receive irrigation, as discussed in Impact 3.4-1 in the WRF EIR.

Impacts related to construction of the modified project and the application of recycled water to areas that do not currently receive irrigation (as discussed in Impact 3.4-1 in the WRF EIR), could result in significant impacts to special-status plants. The modified project would use similar construction methods and occur in the same habitat types as disclosed in the WRF EIR; therefore, the impacts of the modified project on special-status plants would be similar in scope and intensity as those disclosed in the WRF EIR for the approved project. The impact from the modified WRF Project on Hutchinson's larkspur, and the special-status plant species previously identified in the WRF EIR would be reduced by implementation of adopted Mitigation Measures 3.4-1a through 3.4-1i in the WRF Project EIR. Adopted Mitigation Measures 3.4-1a through 3.4-1d require floristic surveys prior to construction and ongoing maintenance activities with potential for ground disturbance and prior to the initial application of recycled water to areas that currently do not receive irrigation to determine if special-status plants are present in suitable habitat for the species within the project site; avoidance of special-status plants outside of the permanent footprint of the project; consultation with CDFW and USFWS (depending on species status) for any special-status plant that cannot be avoided; mitigation for the loss of special-status plants with a performance standard that achieves no net loss of plants and occupied habitat; creation of a long-term management plan to manage the preserve or compensatory populations; and environmental monitoring to ensure all requirements of environmental mitigation are being met. Implementation of adopted Mitigation Measures 3.4.1e through 3.4-1h requires that the project does not plant invasive plant species on campus; requires the use of certified weed free construction materials; and requires monitoring and treatment of invasive plant infestations within construction areas to prevent spread. Implementation of adopted Mitigation Measure 3.4-1i would reduce fugitive dust limiting the amount of disturbed area, using water to suppress dust, reducing vehicle speed, and planting groundcover vegetation or using chemical soil binders on bare ground that will not be developed within a month. With the application of these adopted Mitigation Measures from the WRF EIR, impacts of the modified WRF Project on Hutchinson's larkspur and the special-status plant species previously identified in the WRF Project EIR would be reduced a to less-than-significant level.



Source: Adapted by Ascent in 2023.

Figure 2-1 Land Cover (Modified Project)

Therefore, the modified project would not result in new or more severe impacts than were identified in the WRF EIR with regard to special-status plants. No substantial change from the previous conclusions in the WRF EIR would occur.

2.3.2 Special-Status Wildlife

As discussed under Impact 3.4-2 in the WRF EIR, the construction of the approved project would occur in suitable habitat and has the potential to result in loss of individuals and substantial adverse effects on several other special-status wildlife species, such as monarch butterfly, South-Central California Coast steelhead, California red-legged frog, western pond turtle, Coast Range newt, coast horned lizard, tricolored blackbird, grasshopper sparrow, burrowing owl, white-tailed kite, least Bell's vireo, loggerhead shrike, purple martin, pallid bat, Townsend's big-eared bat, western mastiff bat, American badger, Monterey dusky-footed woodrat, and ringtail. Implementation of adopted Mitigation Measures 3.4-2a though 3.5-2cc would reduce potentially significant impacts to a less-than-significant level by requiring surveys, avoidance measures, and monitoring requirements.

Based on the revised and updated record searches (CNDDB 2024; CNPS 2024), and because the modified project site contains the same vegetation and habitats described in Section 3.4.2 of the WRF EIR, there are no additional special-status wildlife with the potential to occur within the modified WRF project site beyond those analyzed in the WRF EIR for the approved project. However, changed circumstances have occurred with regard to the status of the western pond turtle and burrowing owl since certification of the WRF EIR, as described below.

Western pond turtle (*Actinemys marmorata*) was identified in the WRF EIR as being known to occur within the project site, and the impacts from the project on western pond turtle were analyzed in the WRF EIR. The taxonomy of the species has changed since completion of the WRF EIR, and the project site is now considered to be within the range of the southwestern pond turtle (*Actinemys pallida*). The status of the species has also changed since the WRF EIR was completed, and the southwestern pond turtle is now proposed for listing as threatened under the federal endangered species act (USFWS 2023). Also, an additional occurrence of the species has been documented on campus and outside of the modified project area (iNaturalist 2023).

Burrowing owl (*Athene cunicularia*) was identified in the WRF EIR as having the potential to occur within the project site, and the impacts from the project burrowing owl were analyzed in the WRF EIR. The modified location of the WRF occurs within existing development and a swine unit pasture and is not likely to affect habitat for burrowing owl; however, the modified force main occurs within grassland that could support burrowing owls.

As shown in Figure 2-1, the modified project site contains the same vegetation and habitat types described in Section 3.4.2 of the WRF EIR, the modified project would use similar construction methods and timing; therefore, the impacts to special-status wildlife from the modified project would not be substantially different that those disclosed in Impact 3.4.2 of the WRF EIR. The impact from the modified project on special-status wildlife species identified in the WRF EIR, would be reduced to less than significant by application of adopted Mitigation Measures 3.4-2a through 3.4-2DD in the WRF EIR, which would include species specific surveys, monitoring and avoidance measures that would avoid or minimize impacts to special-status wildlife.

While the taxonomy and listing status of the southwestern pond turtle has changed since certification of the WRF EIR, no changes to the mitigation measure are necessary to reduce impacts to a less-than-significant level for the modified project. However, the status of burrowing owl has changed since the WRF EIR was completed, and the species is now a candidate for listing under the California endangered species act (CESA), which affords legal protection against take of the species, and requires revisions to Mitigation Measure 3.4-2u: Conduct Special-Status Bird and Other Bird Nest Avoidance (Campus Master Plan EIR Mitigation Measure 3.5-2u).

Revisions to Mitigation Measure 3.4-2u consist of the following:

- within the text of bullet a), the word, "…special status…" has been removed and replaced with, "…tricolored blackbird, grasshopper sparrow, white-tailed kite, least Bell's vireo, loggerhead shrike, and purple martin, …"; and,

- within the text of bullet b.ii), reference to the "CDFW Staff Report on Burrowing Owl Mitigation (CDFW 2012)," has been removed and replaced with bullet c), which provide detailed mitigation to reduce impacts to burrowing owl as defined as a candidate for listing under CESA.

With these changes incorporated, Mitigation Measure 3.4-2u is hereby revised as follows.

Mitigation Measure 3.4-2u: Conduct Special-Status Bird and Other Bird Nest Avoidance (*Campus Master Plan EIR Mitigation Measure 3.5-2u*)

The following measures shall be implemented to avoid or minimize loss of active special-status bird nests including tricolored blackbird, grasshopper sparrow, burrowing owl, white-tailed kite, least Bell's vireo, loggerhead shrike, and purple martin:

a) To minimize the potential for loss of tricolored blackbird, grasshopper sparrow, white-tailed kite, least Bell's vireo, loggerhead shrike, purple martin, or other bird nests, vegetation removal activities within potentially suitable nesting habitat shall commence during the nonbreeding season (September 16–January 31), where feasible.

b) If project construction activities, including ground-disturbing activities, vegetation trimming, or tree removal are scheduled to occur between February 1 and September 15, the following measures shall be implemented:

   i) For construction activities on or within 500 feet of agricultural land, pasture, nonnative annual grassland, eucalyptus grove, or riparian habitat as shown in Figure 3.5-1, "Land Cover," of the Campus Master Plan EIR (Cal Poly 2020) and ornamental/landscaping trees in developed habitat, Cal Poly shall retain a qualified biologist to conduct habitat assessment surveys for common nesting birds and raptors, tricolored blackbird, grasshopper sparrow, burrowing owl, white-tailed kite, least Bell's vireo, loggerhead shrike, and purple martin. If no suitable habitat is present within 500 feet of construction activities, no further action is required.

   ii) Where suitable habitat is present, surveys shall be conducted by biologists adhering to guidance offered in Least Bell's Vireo Survey Guidelines (USFWS 2001) and/or current industry standards. Cal Poly shall initiate consultation with USFWS and/or CDFW as required and shall mitigate for the loss of breeding and foraging habitat as determined by consultation.

   iii) Two weeks prior to construction, a preconstruction nesting bird survey shall be conducted within suitable habitat identified in Mitigation Measure 3.4-2u(b)(i). If nests are detected, a qualified biologist shall establish no-disturbance buffers around nests. Buffers shall be of sufficient width that breeding is not likely to be disrupted or adversely affected by construction. No-disturbance buffers around active nests shall be a minimum of 0.25 mile wide for white-tailed kite, 500 feet wide for other raptors, and 250 feet wide for other special-status birds, unless a qualified biologist determines based on site-specific conditions that a larger or smaller buffer would be sufficient to avoid impacts on nesting birds. Factors to be considered in determining buffer size shall include the presence of existing buffers provided by vegetation, topography, or existing buildings/structures; nest height; locations of foraging territory; and baseline levels of noise and human activity. Buffers shall be maintained until a qualified biologist has determined that young have fledged and are no longer reliant upon the nest or parental care for survival. Monitoring of the nest by a qualified biologist during and after construction activities shall be required if the activity has potential to adversely affect the nest.

   iv) For tricolored blackbird, the qualified biologist shall conduct preconstruction surveys within tules, cattails, Himalayan blackberry, and riparian scrub habitat areas. The surveys shall be conducted no more than 14 days before construction commences. If no active nests or tricolored blackbird colonies are found during focused surveys, no further action under this measure shall be required. If active nests are located during the preconstruction surveys, the biologist shall notify CDFW. If necessary, modifications to the project design to avoid removal of occupied habitat while still achieving project objectives shall be evaluated and implemented to the extent feasible. If avoidance is not feasible or conflicts with project objectives, construction shall be prohibited within a minimum of 100 feet of the outer edge of the nesting colony, unless a qualified biologist determines based on site-specific conditions that a larger or smaller buffer would be sufficient, to avoid disturbance until the nest colony is no longer active.

c) Where proposed activities are implemented in habitat suitable for burrowing owls, a qualified biologist shall conduct surveys for burrowing owls in areas of habitat suitable for the species on and within 1,640 feet (500 meters) of the proposed activities. Inaccessible areas (e.g., adjacent private property) will not be surveyed directly, but the biologist may use binoculars or a spotting scope to survey these areas. A minimum of four surveys shall be conducted to determine whether burrowing owls occupy the site. Surveys shall be conducted according to Appendix D of the 2012 Staff Report on Burrowing Owl Mitigation prepared by the California Department of Fish and Game (now CDFW) (CDFW 2012), or any subsequent updated guidance. If feasible, at least one survey should be conducted between February 15 and April 15 and the remaining surveys should be conducted between April 15 and July 15, at least three weeks apart. Because burrowing owls may recolonize a site after only a few days, one of the surveys, or an additional survey, shall be conducted no less than 14 days before initiating ground disturbance activities to verify that take of burrowing owl would not occur.

   (1) If no burrowing owls are found, the qualified biologist shall submit a report documenting the survey methods and results to Cal Poly, and no further mitigation shall be required.

   (2) If a burrow occupied by a burrowing owl is found during the surveys, the project applicant shall establish and maintain a buffer around the occupied burrow and any identified satellite burrows (i.e., non-nesting burrows that burrowing owls use to escape predators or move young into after hatching) to prevent take of the burrowing owls.

   (3) During the non-breeding season (September 1 through January 31), the minimum buffer distance shall be 164 feet (50 m). During the breeding season (February 1 through August 31), the minimum buffer distance shall be increased to 1,640 feet (500 m).

   (4) The buffer may be adjusted if, in consultation with CDFW, a qualified biologist determines that an alternative buffer shall not result in take of burrowing owl adults, young, or eggs because of particular site features (e.g., topography, natural line-of-sight barriers), level of project disturbance, or other considerations. If the buffer is reduced, a qualified biologist shall monitor the behavior of the burrowing owls during all project activities within 1,640 feet of the burrow. If the owls are disturbed or agitated (e.g., vocalizations, bill snaps, fluffing feathers to increase body size appearance, drooping wings and rotating them forward, crouching and weaving back and forth) by the project activities, the biologist shall have the authority to halt the activities and re-establish a buffer consistent with the first bullet until the agitated behavior ceases and normal behavior resumes.

   (5) The buffer shall remain in place around the occupied burrow and associated satellite burrows until a qualified biologist has determined through noninvasive methods that the burrows are no longer occupied by burrowing owl. A previously occupied burrow will be considered unoccupied if surveys demonstrate that no owls have used the burrow for seven consecutive days.

   (6) Locations of burrowing owls detected during surveys shall be reported to the CNDDB.

   (7) If implementation of a buffer to prevent take of burrowing owl is not feasible, Cal Poly shall consult with CDFW and obtain an Incidental Take Permit (ITP) prior to commencing project related ground-disturbing activities. The impacts of taking burrowing owl shall be minimized and fully mitigated.

   (8) Cal Poly shall compensate for the loss of burrowing owl by establishing permanent protection and perpetual management on land that provides burrowing owl habitat. Habitat management lands for burrowing owl may be established by conservation easement or fee title or credits may be purchased from a CDFW-approved conservation or mitigation bank. The compensatory mitigation shall satisfy permit conditions and all other permit conditions shall be implemented.

Implementation of the revised Mitigation Measure 3.4-2u, would not result in new significant impacts, because it increases protections for burrowing owl including specific requirements for potential mitigation, and would not result in new ground disturbing activities.

Implementation of the revised Mitigation Measure 3.4-2u requires nesting season avoidance, survey for nests and burrowing owl burrows, no-disturbance buffers around nests and burrows, and requires compensation for loss of burrowing owl burrows when avoidance is not feasible. These actions reduce the potentially significant impacts on special-status and common nesting birds and raptors to a less than significant level. Therefore, with the application of the adopted Mitigation Measures from the WRF EIR and the revised Mitigation Measure 3.4-2u, the modified project would not result in new or more severe impacts on special-status and common nesting birds and raptors than were identified in the analysis provided in the WRF EIR, and does not alter the conclusions of the WRF EIR.

2.3.3 Sensitive Natural Communities and Riparian Habitat

As identified in Impact 3.4-3 in the WRF EIR, the approved project components would occur within riparian habitat and may occur within sensitive natural communities. In addition, operation of the WRF may result in altered patterns of irrigation where sensitive natural communities have been observed. The construction and operation of these components may result in removal of sensitive natural community and riparian vegetation. Implementation of adopted Mitigation Measures 3.4-3a through 3.4-3i, would avoid, minimize, and compensate for adverse effects such that impacts on sensitive natural communities and riparian habitat would be reduced to a less-than-significant level.

As depicted above in Figure 2-1, there would not be new landcover types in addition to those disclosed for the approved project in Section 3.4.2 of the WRF EIR. The modified location of the WRF and force main would not occur within sensitive natural communities or riparian habitats. The crossing of Brizzolara Creek by the modified force main would be at a different location than that identified in the WRF EIR, but as discussed in the WRF EIR, the crossing would occur underground, above the existing underground box culvert, and would avoid riparian impacts. Because the modified project would be constructed using similar methods in the same habitat types as the WRF EIR, the impacts from the modified project on sensitive natural communities and riparian habitat would not be more severe than those identified in the WRF EIR. Furthermore, the impacts to sensitive natural communities and riparian habitats that result from the modified project would be subject to Mitigation Measures 3.4-3a through 3.4-3i from the WRF EIR, which would reduce impacts from the modified project to less than significant.

Therefore, the modified project would not result in new or more severe impacts than were identified in the WRF EIR with regard to sensitive natural communities and riparian habitat. No substantial change from the previous conclusions in the WRF EIR would occur.

2.3.4 State or Federally Protected Wetlands and Other Waters

As discussed under Impact 3.4-4 of the WRF EIR, construction of the approved project includes repair of existing distribution lines and construction of project components that may result in loss of functions and values of jurisdictional waters. Implementation of Mitigation Measure 3.4-4 would avoid, minimize, and compensate for adverse effects such that impacts on state or federally protected wetlands or other waters would be reduced to a less-than-significant level.

The modified project may also occur within state or federally protected wetlands and other waters. The impact on state or federally protected wetlands and other waters was discussed in Impact 3.4.4 of the WRF EIR. The modified WRF location may result in an increase of fill within the same seasonal drainages where fill would have occurred under the approved project; however, no new drainages would be affected by the modified project that were not previously analyzed. The modified project would be constructed using similar methods and the impacts on state or federally protected wetlands and other waters. Furthermore, the impacts to state or federally protected wetlands and other waters that result from the modified project would be subject to Mitigation Measures 3.4-4a from the WRF EIR, which would reduce impacts from the modified project to less than significant.

Therefore, the modified project would not result in new or more severe impacts than were identified in the WRF EIR with regard to state or federally protected wetlands and other waters. No substantial change from the previous conclusions in the WRF EIR would occur.

2.3.5 Wildlife Movement and the Use of Native Wildlife Nursery Sites

As discussed under Impact 3.4-5 in the WRF EIR, the approve project would not affect native wildlife nursery sites and would not involve construction or operation of project features that would impede wildlife movement or result in permanent removal of vegetation within riparian corridors or cause direct impacts on creeks. These impacts would be less than significant.

The modified project involves realignment of the force main, relocation of the WRF, and adjustments to the recycle water storage reservoir. As discussed above and shown in Figure 2-1, the modified project site would occur within the same landcover types as the approved project as detailed in Section 3.4.2 of the WRF EIR. Similar construction methods would also be used to construct the modified project, such as crossing Brizzolara Creek above the existing box culvert to avoid riparian impacts. Because the modified project would be constructed using similar methods in the same habitat types as the WRF EIR, the impacts from the modified project on wildlife movement and use of native wildlife nursery sites would not be more severe than those identified in the WRF EIR and would remain less than significant.

Therefore, the modified project would not result in new or more severe impacts than were identified in the WRF EIR with regard to wildlife movement and the use of native wildlife nursery sites. No substantial change from the previous conclusions in the WRF EIR would occur.

2.4 HYDROLOGY AND WATER QUALITY

Section 3.5, "Hydrology and Water Quality," of the WRF EIR evaluated the impact of the approved project on hydrology and water quality (pages 3.5-1 through 3.5-23 of the WRF EIR).

The WRF EIR indicated that the approved project would have a less-than-significant impact on water quality and would not violate water quality standards and WDRs during operation (Impact 3.5-1). Mitigation measures were adopted to reduce impacts on the alteration of drainage patterns and the release of pollutants due to project inundation (Impact 3.5-2) and embankment overtopping and berm failure (Impact 3.5-3) to a less-than-significant level.

2.4.1 Violate Water Quality Standards and Waste Discharge Requirements During Operation

As discussed in Impact 3.5-1 of the WRF EIR, the approved project would result in new impervious surfaces, which could increase the rate of surface water runoff from the project site. Compliance with the NPDES General Permit for WDRs for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems (2013 General Permit), CCR Title 22 requirements for recycled water, and other WDRs applicable to campus would result in less-than-significant impacts on water quality standards and WDRs during operation of the approved project.

As described in Section 1.5.5, "Summary of Project Modifications," the modified project would result in the following changes to the approved project: realignment of the force main, elimination of the upper lift station, installation of a swine unit lift station, relocation of the WRF, and modifications to the recycled water storage reservoir. Because the modified project would reduce the area of impervious surfaces by eliminating the upper lift station and reducing the area needed to support the WRF (from 1.5 acres under the approved project to 1.1 acres under the modified project), there would be less potential to increase surface water runoff associated with new impervious surface. This reduced area of impervious surfaces under the modified project, compared to the approved project, would consequently decrease the potential for erosion and the associated contaminated storm water that could affect surface water and groundwater quality. In addition, the modified project would continue to comply with the same requirements as under the approved project, including, the Construction General Permit, the 2013 General Permit, SWPPPs, CCR Title 22 requirements, and inclusion of LID techniques into project design (e.g., pervious surfaces, bioretention swales, wet wells, would control storm water flow and prevent contamination of surface water resources). Compliance with these regulatory and design requirements would ensure that impacts related to water quality standards during project operations would be less than significant.

Therefore, the modified project would not result in new or more severe impacts than were identified in the WRF EIR with regard to violation of water quality standards and WDRs or degradation of water or groundwater quality. No substantial change from the previous conclusions in the WRF EIR would occur.

2.4.2 Alteration of Drainage Patterns

Impact 3.5-2 in the WRF EIR evaluates the potential for the approved project to substantially alter the existing drainage pattern of the site or area such that substantial erosion, siltation, flooding, polluted runoff, or an exceedance of the capacity of storm drainage systems would occur. As identified in the WRF EIR, activities associated with the approved project would have the potential to substantially alter existing drainage patterns and require storm drainage modifications to prevent substantial runoff from the site during operation. However, implementation of adopted Mitigation Measure 3.5-2a and 3.5-2b requires the preparation of a drainage plan and supportive hydrologic analysis to maintain similar drainage patterns and flow rates, as well as post-development storm water best management practices and LID technologies to ensure that post-development runoff does not exceed storm drain capacity or result in erosion, siltation, or flooding. These mitigation measures would reduce impacts to a less-than-significant level.

As described in Section 1.5.5, "Summary of Project Modifications," the modified project would result in the following changes to the approved project: realignment of the force main, elimination of the upper lift station, installation of a swine unit lift station, relocation of the WRF, and modifications to the recycled water storage reservoir. The force main pipeline between the lower lift station and the WRF would be roughly 700 linear feet (LF) longer under the modified project (6,000 LF) compared to the approved project (5,300 LF); however, the 4,800-square foot upper lift station and the 2,400 LF of force main pipeline from the upper lift station to the WRF would no longer be necessary under the modified project. In addition, the WRF would occupy a smaller area under the modified project (1.1 acres) compared to the approved project (1.5 acres). The swine unit lift station would result in approximately 30 square feet of ground disturbance for the wet well and the associated pipelines would result in 1,400 LF of ground disturbance. Overall, compared to the approved project, the modified project is anticipated to result in a smaller area of ground disturbance during construction activities and a smaller increase in impervious surfaces from existing conditions. Similar to the approved project, the modified project would be subject to the requirements of the NPDES Construction General Permit and 2013 General Permit to address construction and post-construction runoff or polluted runoff. Further, implementation of Mitigation Measures 3.5-2a and 3.5-2b would continue to apply to the modified project to address changes in drainage patterns from the modifications to the recycled water storage reservoir. With implementation of these mitigation measures, impacts would remain less-than-significant under the modified project.

Therefore, the modified project would not result in new or more severe impacts than were identified in the WRF EIR with regard to alteration of drainage patterns. No substantial change from the previous conclusions in the WRF EIR would occur.

2.4.3 Release of Pollutants from Project Inundation

As discussed Impact 3.5-3 in the WRF EIR, the recycled water storage reservoir under the approved project would have the potential to result in flooding if the earthen berms were to fail. If inundation of these areas were to occur, the risk of release of pollutants including nutrients, bacteria, hazardous materials, chemicals, or other pollutants was determined to be a potentially significant impact. However, implementation of adopted Mitigation Measure 3.5-3 would minimize the potential for embankment overtopping and berm failure and ensure that impacts associated with the release of pollutants due to project inundation would be reduced to less than significant.

The modified project involves a smaller footprint and depth of excavation to support the recycled water storage reservoir. Regardless, the reservoir does not meet the requirements to be regulated under the authority of the State Division of Dam Safety, and thus, there are no standards for which it must comply. For this reason, the earthen berm may fail and cause subsequent flooding of areas within the campus. However, adopted Mitigation Measure 3.5-3 would apply to the modified project and would minimize the potential for embankment overtopping and berm failure and ensure that impacts associated with the release of pollutants due to project inundation would be reduced to less than significant.

Therefore, the modified project would not result in new or more severe impacts than were identified in the WRF EIR with regard to berm failure. No substantial change from the previous conclusions in the WRF EIR would occur.

2.5 UTILITIES AND SERVICE SYSTEMS

Section 3.6, "Utilities and Service Systems," of the WRF EIR evaluated the impact of the approved project on utilities and service systems (pages 3.6-1 through 3.6-17 of the WRF EIR).

The WRF EIR concluded that the approved project would have a less-than-significant impact from the construction of new or expanded utility infrastructure (Impact 3.6-2) and the generation of solid waste (3.6-3). The WRF EIR also indicated potentially significant impacts due to accidental disruption of utility services to the campus and portions of the City; however, implementation of adopted Mitigation Measure Mitigation Measure 3.6-1 would require the location and identification of existing utility infrastructure before construction begins, which would minimize the potential for disruption of services and reduce this impact to less than significant.

2.5.1 Disrupt or Require Relocation of Existing Utility Infrastructure

As discussed in Impact 3.6-1 of the WRF EIR, the approved project involves construction of infrastructure (e.g., nonpotable water pipelines, two new lift stations, new influent force mains) that would be buried within existing roadways or previously disturbed areas where other underground utility infrastructure is present. The WRF EIR concluded that the approved project would have a less-than-significant impact on existing utility infrastructure with implementation of Mitigation Measure 3.6-1, which requires locating and avoiding underground utilities and preparing and implementing a response plan if accidental disruption occurs.

Similar to the approved project, existing utilities may be encountered during construction of the modified project resulting in the accidental disruption of services. Elimination of the upper lift station would eliminate the potential for utility conflicts at this location; however, potential utility conflicts may occur within the modified force main alignment. In addition, the force main alignment under the modified project, similarly to the approved project, includes roadways and other disturbed areas that may contain existing underground utilities. Implementation of adopted Mitigation Measure 3.6-1 would continue to apply to the modified project to avoid and minimize potential damage to utilities that could result in the disruption of services.

Therefore, the modified project would not result in new or more severe impacts than were identified in the WRF EIR with regard to disruption of utility services. No substantial change from the previous conclusions in the WRF EIR would occur.

2.5.2 New or Expanded Utility Infrastructure

Impact 3.6-2 in the WRF EIR evaluates the potential for the approved project to result in significant environmental effects associated with the construction of new or expanded utility infrastructure. As discussed, because adequate water and wastewater collection and treatment would be provided by the approved project, electrical and telecommunications services are available to serve the approved project, and the environmental effects of infrastructure proposed as part of the approved project are evaluated throughout the Final EIR, no new or expanded utilities or service systems that may result in environmental impacts would be required; thus, this impact would be less than significant.

The modified project consists of minor changes to the approved project, but would not alter provisions for water supply, wastewater collection and treatment, electricity and/or telecommunication services. Thus, because the modified project would not increase the demand for utility services relative to the approved project, it would not necessitate the construction of new or expanded infrastructure that could result in additional environmental effects.

Therefore, the modified project would not result in new or more severe impacts than were identified in the WRF EIR with regard to new or expanded utility infrastructure. No substantial change from the previous conclusions in the WRF EIR would occur.

2.5.3 Solid Waste

As discussed under Impact 3.6-3 in the WRF EIR. local and regional landfills have adequate capacity to accommodate the solid waste generated by the approved project, including debris generated during construction and biosolids generated during WRF operation. The WRF EIR concluded that the approved project would have a less-than-significant impact related to solid waste.

As described in Section 1.5.5, "Summary of Project Modifications," the modified project would reduce the amount of excavation needed to accommodate the recycled water storage reservoir, which would in turn reduce the amount of solid waste generated during construction. Other elements of the modified project would not alter the amount of solid waste generated during construction or operation compared to the approved project. In addition, the modified project would not affect Cal Poly's solid waste diversion program, which reduces campus-generated contributions to landfills through recycling, composting, and donating/reselling efforts.

Therefore, the modified project would not result in new or more severe impacts than were identified in the WRF EIR with regard to solid waste generation and compliance with state and local solid waste standards and goals. No substantial change from the previous conclusions in the WRF EIR would occur.

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3 REFERENCES AND PREPARERS

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