Final Program Environmental Impact Report
Land Use and Circulation Elements Update (LUCE)

State Clearinghouse No. 2013121019

Prepared for:

City of San Luis Obispo
Community Development Department
919 Palm Street
San Luis Obispo, CA 93401

FINAL
September 3, 2014

All paper used in this document is made from 100% post-consumer recycled content.
The work upon which this publication is based was funded in whole or in part through a grant awarded by the Strategic Growth Council. The statements and conclusions in this report are those of the City of San Luis Obispo and not necessarily those of the Strategic Growth Council or of the Department of Conservation, or its employees. The Strategic Growth Council and the Department make no warranties, expressed or implied, and assume no liability for the information contained in this report.
The City of San Luis Obispo would like to thank and recognize the efforts of those involved in the development of the Land Use and Circulation Elements (LUCE) Update and associated Program Environmental Impact Report (EIR).

### City of San Luis Obispo

#### Citizens of San Luis Obispo

The residents of the City who participated in the development of the LUCE update.

<table>
<thead>
<tr>
<th>City Council</th>
<th>Planning Commission</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jan Howell Marx, Mayor</td>
<td>John Larson, Chairperson</td>
</tr>
<tr>
<td>John Ashbaugh</td>
<td>Michael Multari,</td>
</tr>
<tr>
<td>Dan Carpenter</td>
<td>Vice Chairperson</td>
</tr>
<tr>
<td></td>
<td>Hemalata Dandekar</td>
</tr>
<tr>
<td></td>
<td>Michael Draze</td>
</tr>
<tr>
<td></td>
<td>John Fowler</td>
</tr>
<tr>
<td></td>
<td>Andrew Carter (Former)</td>
</tr>
<tr>
<td></td>
<td>Carlyn Christianson</td>
</tr>
<tr>
<td></td>
<td>Kathy Smith</td>
</tr>
<tr>
<td></td>
<td>Ronald Malak</td>
</tr>
<tr>
<td></td>
<td>Eric Meyer (Former)</td>
</tr>
<tr>
<td></td>
<td>William Riggs</td>
</tr>
<tr>
<td></td>
<td>Airlin Singewald (Former)</td>
</tr>
<tr>
<td></td>
<td>Charles Stevenson (Former)</td>
</tr>
</tbody>
</table>

#### TF-LUCE

<table>
<thead>
<tr>
<th></th>
<th>City Staff</th>
</tr>
</thead>
<tbody>
<tr>
<td>Walter Bremer</td>
<td>Katie Lichtig</td>
</tr>
<tr>
<td>Russell Brown</td>
<td>Derek Johnson</td>
</tr>
<tr>
<td>Carlyn Christianson (Former)</td>
<td>Kim Murry</td>
</tr>
<tr>
<td>Chuck Crotser</td>
<td>Peggy Mandeville</td>
</tr>
<tr>
<td>Hemalata Dandekar</td>
<td>Jake Hudson</td>
</tr>
<tr>
<td>Jon Goetz</td>
<td></td>
</tr>
<tr>
<td>Dave Juhnke</td>
<td></td>
</tr>
<tr>
<td>Stephan Lamb (Former)</td>
<td></td>
</tr>
<tr>
<td>Eric Meyer, Chairperson</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Katie Lichtig</td>
</tr>
<tr>
<td></td>
<td>Derek Johnson</td>
</tr>
<tr>
<td></td>
<td>Kim Murry</td>
</tr>
<tr>
<td></td>
<td>Peggy Mandeville</td>
</tr>
<tr>
<td></td>
<td>Jake Hudson</td>
</tr>
<tr>
<td></td>
<td>Dean Miller (Former)</td>
</tr>
<tr>
<td></td>
<td>Michael Multari</td>
</tr>
<tr>
<td></td>
<td>Matt Quaglino</td>
</tr>
<tr>
<td></td>
<td>Pierre Rademaker</td>
</tr>
<tr>
<td>Taft Laboratory (Former)</td>
<td>Chris Richardson</td>
</tr>
<tr>
<td></td>
<td>Rob Rossi</td>
</tr>
<tr>
<td></td>
<td>Sandra Rowley</td>
</tr>
<tr>
<td></td>
<td>Carla Saunders</td>
</tr>
<tr>
<td></td>
<td>Sharon Whitney</td>
</tr>
</tbody>
</table>

#### City Staff

<table>
<thead>
<tr>
<th>LUCE Update Project Management</th>
<th>City Staff</th>
</tr>
</thead>
<tbody>
<tr>
<td>Katie Lichtig</td>
<td>Derek Johnson</td>
</tr>
<tr>
<td>Derek Johnson</td>
<td>Kim Murry</td>
</tr>
<tr>
<td>Peggy Mandeville</td>
<td>Jake Hudson</td>
</tr>
<tr>
<td>Jake Hudson</td>
<td></td>
</tr>
<tr>
<td>Kim Murry</td>
<td></td>
</tr>
<tr>
<td>Peggy Mandeville</td>
<td></td>
</tr>
<tr>
<td>Jake Hudson</td>
<td></td>
</tr>
</tbody>
</table>

City Manager

Director, Community Development Department

Deputy Director, Community Development Department

Principal Transportation Planner

Traffic Operations Manager
Other Key City Staff

- Shannon Bates, Recreation and Arts Manager, (Former) Parks and Recreation department
- Erik Berg-Johansen, Planning Technician, Community Development Department
- Tim Bochum, Deputy Director, Public Works Department
- Claire Clark, Economic Development Manager, (Former) Administration Department
- James David, Associate Planner, (Former) Community Development Department
- Doug Davidson, Deputy Director, Community Development Department
- Christine Dietrick, City Attorney
- Phil Dunsmore, Senior Planner, Community Development Department
- Joe Fernandez, Contract Traffic Engineer, Public Works Department
- Steven Gessell, Chief, Police Department
- Daryl Grigsby, Director, Public Works Department
- Neil Havlik, Natural Resources Manager (Former) Administration Department
- Robert Hill, Natural Resources Manager, Administration Department
- Marissa Lee, Intern, Community Development Department
- Lee Johnson, Economic Development Manager, Administration Department
- Barbara Lynch, City Engineer, Public Works Department
- Rodger Maggio, Fire Marshall, Fire Department
- Carrie Mattingly, Director, Utilities Department
- Jennifer Metz, Utilities Project Manager, Utilities Department
- Garret Olson, Chief, Fire Department
- Freddy Otte, Biologist, Administration Department
- Wayne Padilla, Director, Finance and Information Technology Department
- Kerri Rosenblum, Communications and Records Manager, Police Department
- Shelly Stanwyck, Director, Parks and Recreation department
- Keith Storton, Captain, Police Department
- David Yun, GIS, Community Development Department
## General Plan Consulting Team

### Matrix Design Group
- Celeste Werner, AICP, Principal in Charge
- Rick Rust, AICP, LUCE Update Project Manager
- Mike Hrapla, Infrastructure Task Manager
- Bren Cox, Senior Planner
- Willilam Kavadas, Associate Planner
- Matt Simpson, Engineer
- Melanie Jollett, Engineer
- Jeff Clonts, GIS Analyst
- Janne Graham, Word Processing
- Cathy Lloyd, Graphics

### Mintier Harnish
- Larry Mintier, FAICP, Project Director
- Jim Harnish, JD, Planner/ Environmental Review
- Ted Holzem, Senior Planner
- Dov Kadin, Associate Planner
- Jim Pepper, ASLA, MCP, Senior Planner

### Kittelson & Associates
- Jim Damkowitch, Circulation Task Manager
- Alice Chen, Senior Planner
- Kamala Parks, Senior Planner
- Frank Cai, T.E., Senior Engineer
- Sean Houck, P.E., Senior Engineer
- Darryl DePencier, Associate Planner
- Mathew Braughton, Transportation Analyst
- Aaron Elias, T.E., Associate Engineer
- Amy Lopez, Transportation Analyst

### Oliveira Environmental Consulting
- Jeff Oliveira, EIR Task Manager
- Jason Kirschenstein, Environmental Analyst
- Kevin Merk, Environmental Analyst
- John Rickenbach, Environmental Analyst
- Steve Rodriguez, AICP, Environmental Analyst
- Bob Sloan, Environmental Analyst
- David Wolff, Environmental Analyst

### Applied Development Economics
- Doug Svensson, AICP, Fiscal/Financial Task Manager
- Peter Cheng, Economist
<table>
<thead>
<tr>
<th>Company</th>
<th>Name</th>
<th>Title</th>
</tr>
</thead>
<tbody>
<tr>
<td>Flint Strategies</td>
<td>Kendall Flint</td>
<td>Outreach Task Manager</td>
</tr>
<tr>
<td></td>
<td>Steve Flint</td>
<td>Outreach Specialist</td>
</tr>
<tr>
<td></td>
<td>Eric Allen</td>
<td>Outreach Specialist</td>
</tr>
<tr>
<td>Ascent Environmental</td>
<td>Honey L. Walters</td>
<td>Senior Environmental Specialist</td>
</tr>
<tr>
<td></td>
<td>Dimitri Antoniou</td>
<td>Environmental Analyst</td>
</tr>
<tr>
<td></td>
<td>Erik de Kok, AICP</td>
<td>Senior Planner</td>
</tr>
<tr>
<td>UrbanGreen</td>
<td>Jim Heid, FASLA</td>
<td>Urban Design Task Manager</td>
</tr>
</tbody>
</table>
# Table of Contents

## Final Program EIR

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Executive Summary</td>
<td>ES-1</td>
</tr>
<tr>
<td>ES.1. Project Description</td>
<td>ES-2</td>
</tr>
<tr>
<td>ES.2. Project Objectives</td>
<td>ES-8</td>
</tr>
<tr>
<td>ES.3. Summary of Impacts and Mitigation Measures</td>
<td>ES-8</td>
</tr>
<tr>
<td>ES.4. Alternatives</td>
<td>ES-8</td>
</tr>
<tr>
<td>ES.5. Incorporation of Studies, Reports and Other Documents</td>
<td>ES-10</td>
</tr>
<tr>
<td>ES.6. Areas of Public Controversy</td>
<td>ES-10</td>
</tr>
</tbody>
</table>

## 1.0 Introduction

1.1 Overview of the General Plan                                       | 1-1    |
1.2 General Plan Update Process                                        | 1-2    |
1.3 Legal Authority                                                    | 1-4    |
1.4 Scope and Content of the EIR                                       | 1-5    |
1.5 Lead, Responsible, and Trustee Agencies                            | 1-6    |
1.6 Intended Uses of the EIR                                           | 1-7    |
1.7 EIR Process                                                        | 1-8    |
1.8 Organization of the Final EIR                                      | 1-9    |

## 2.0 Response to Comments

2.1 Master Responses                                                   | 2-1    |
2.2 Summary of Comment Letters                                         | 2-3    |
2.3 Comment Letters and Associated Responses                           | 2-10   |

## 3.0 Minor Edits to the Draft EIR                                     | 3-1    |
3.1 Edits in Volume I, Draft EIR                                       | 3-2    |
3.2 Edits in Volume II, Elements and Plans (Land Use Element)          | 3-24   |
3.3 Edits in Volume II, Elements and Plans (Circulation Element)       | 3-27   |
3.4 Edits in Volume III, Background Report                            | 3-28   |
3.5 Edits in Volume IV, EIR Technical Studies                          | 3-29   |
3.6 Edits in Volume V, Circulation Assessment                          | 3-30   |
3.7 Edited Figures                                                     | 3-31   |

## 4.0 List of Preparers                                                | 4-1    |
List of Figures (does not include listing of figures edited based on comments)

Figure ES-1  Land Use Options Considered .............................................................. ES-3

List of Tables (does not include listing of tables edited based on comments)

Table ES-1  Summary of Significant and Unavoidable Impacts, Mitigation Measures and
Significance After Mitigation ......................................................................................... ES-11
Table ES-2  Summary of Significant but Mitigable Impacts, Mitigation Measures and
Significance After Mitigation ......................................................................................... ES-14
Table ES-3  Less Than Significant Impacts, Mitigation Measures and
Significance After Mitigation ......................................................................................... ES-17
Table 2-1  List of Comments Received ........................................................................ 2-4

Appendix

Comments on the General Plan and Policies ........................................................................ A-1

Attachments (Incorporated by Reference)

Volume I, Draft Environmental Impact Report

Volume II. Elements and Plans

Appendix A  Draft Land Use Element
Appendix B  Draft Circulation Element
Appendix C  Draft South Broad Street Area Plan

Volume III. Background Report

Appendix D  Background Report

Volume IV. EIR Technical Studies

Appendix E  NOP and Responses
Appendix F  Airport Land Use Compatibility Report
Appendix G  Air Quality Modeling
Appendix H  Greenhouse Gases
Appendix I  Water Supply Assessment
Appendix J  Noise Modeling

Volume V. Circulation Assessment

Appendix K  Existing Condition Worksheets
Appendix L  Proposed Project Worksheets
Appendix M  LOS Graphics
Appendix N  Sensitivity Analysis
The purpose of this Final EIR (FEIR) is twofold. First, this document provides copies of the comment letters made on the LUCE Update and EIR and provides written responses to all environmental issues raised in these comments on the Draft EIR (see Public Resources Code, Section 21091(d)(2)(B); CEQA Guidelines, Section 15088(c)). Second, this document is designed to function as the Final EIR for the Proposed Project, and as such has been designed to meet the content requirements of a Final Program EIR as specified in the California Environmental Quality Act (CEQA). (See Public Resources Code, Section 21000 et seq. and the CEQA Guidelines [California Code of Regulations, title 14, Section 15000 et seq.].

This Final EIR comprises four chapters that meet the requirements of the State CEQA Guidelines, as outlined above. The four chapters that make up this Final EIR are as follows:

- **“Executive Summary”** provides a brief project description and presents a summary table of the Proposed Project’s environmental effects.
- **Chapter 1, “Introduction”** provides a brief overview of the Proposed Project, environmental compliance activities conducted to date, and outlines the contents and organization of the Final EIR.
- **Chapter 2, “Response to Comments”** provides a list of commenters and a copy of written comments (coded for reference) received on the Draft EIR during the public review period, and provides the City’s response to each comment received.
- **Chapter 3, “Minor Edits to Draft Program EIR”** includes any corrections and/or additions to the Draft EIR text as a result of comments made on the Draft EIR. These changes to the draft EIR are indicated by revision marks (underline for new text and strikeout for deleted text).
- **Chapter 4, “Report Preparation”** provides a list of the individuals involved in the preparation of the final EIR.

In reference to Section 15132(a) of the State CEQA Guidelines, the Draft EIR for the Proposed Project has been incorporated by reference into this Final EIR. A copy of the Draft EIR is on file at the City of San Luis Obispo Community Development Department located at 919 Palm Street, San Luis Obispo, CA. A copy can also be viewed by visiting the LUCE Update web site at (www.slo2035.com).

The following section summarizes the characteristics of the proposed LUCE Update, alternatives considered in this EIR, environmental impacts associated with the proposed project, recommended mitigation measures, and the level of significance of project impacts after mitigation.

Please note that where changes to the Draft EIR Executive Summary text resulted from the responses discussed in Section 2.0 (Response to Comments) or edits shown in Section 3.0 (Minor Edits to the Draft Program EIR), those changes are presented in the text of the Final EIR Executive Summary below as shown by underlining new text (e.g., new text) and striking out text to be deleted (e.g., deleted text).
ES-1  Project Description

The LUCE Update Project (the “Project” or “proposed Update Project”) provides proposed changes to the City’s existing Land Use Element and Circulation Elements of the General Plan (last updated in 1994). It is the intent of the proposed Project to establish and implement a refined set of goals, policies, and programs for regulating development in the city, guiding the land use decision-making process, balance population growth with infrastructure availability, and provide a true multimodal transportation system that will guide the community over the next 20 years.

The LUCE Update reflects extensive efforts and input from community surveys, workshops and open houses, advisory bodies, the Task Force for the Land Use and Circulation Element Update (TF-LUCE), City staff, consultants, the Planning Commission, and City Council. Based on direction from the City Council that the Update Project primarily address infill opportunities, changes in legislation, and the need to update existing policy direction to reflect current values and requirements, the LUCE Update focuses on updated policy language and several areas of the City where “physical” land use changes are proposed. The proposed physical land use changes would apply only to specified areas that over the next 20 years may have the potential to accommodate changes in the land use type or intensity or are in need of circulation and infrastructure improvements. From a policy aspect, the LUCE Update proposes changes to existing policy and program language, and new policies and programs where needed to enhance the two Elements or cover items not previously addressed. The policies and programs included in the LUCE Update are intended to:

- Address notable policy gaps that have been identified over time in the existing LUCE;
- Provide new policy direction to address issues raised during the proposed Project’s public participation process;
- Respond to changes in state law;
- Address topics or items that the City committed to addressing as part of the Sustainable Communities grant that provided funding for the Update Project; and
- Address inconsistencies between the proposed project and the Airport Land Use Plan for San Luis Obispo County Regional Airport.

The Land Use Element Update proposes to “preserve and enhance” existing conditions in most areas of the city. The physical changes proposed by the Land Use Element Update are for the most part limited to changes in land use type or intensity in specific areas. These changes include proposed mixed use redevelopment of some sites, the infill of underutilized locations, and four sites that will require modified or new specific plans to addresses development parameters such as the location and types of land uses, infrastructure needs, and designs to address environmental constraints. These four sites include: Potential modification of the Margarita Area Specific Plan to allow increased residential densities; and new specific plans for the San Luis Ranch (formerly known as the Dalidio site), the Madonna property at Los Osos Valley Road (LOVR), and the Avila Ranch. Policy direction was also refined relative to a set of “Special Planning Areas” (Section 8.3.3 in the proposed Land Use Element Update) throughout the City. This policy guidance provides statements regarding the City’s expectations for these sites of new development, redevelopment, and infill opportunities.

The following table lists each of the original 19 proposed “physical alternative” locations, identifies the sites dropped from further consideration, the sites where no physical changes are proposed, and describes the type of development that could occur at the proposed development sites. Throughout the Land Use Element Update process the 19 proposed “physical alternative” sites were identified by the letters A through S (see Figure ES-1).
Legend

- LUCE SOI Area
- Area of Potential Land Use Change
- Specific Plan Area
- Preserve and Enhance
- City Limits
- Water Body
- Railroad
- Highway
- Major Road
- Streets

Source: City of San Luis Obispo, 2012

Figure ES-1
Land Use Options Considered

Final EIR
<table>
<thead>
<tr>
<th>Site Letter</th>
<th>Site Description</th>
<th>Capacity</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>Nativity Church Site</td>
<td>--</td>
</tr>
<tr>
<td></td>
<td>Removed from consideration.</td>
<td></td>
</tr>
<tr>
<td>B</td>
<td>Foothill @ Santa Rosa Area</td>
<td>80 183 -1,184 -3</td>
</tr>
<tr>
<td></td>
<td>Consider mixed use for the area on both sides</td>
<td></td>
</tr>
<tr>
<td></td>
<td>of Foothill between Chorro and Santa Rosa.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Consider both horizontal and vertical mixed</td>
<td></td>
</tr>
<tr>
<td></td>
<td>use. Emphasis on retail and housing. Policies</td>
<td></td>
</tr>
<tr>
<td></td>
<td>to support consideration of parking and height</td>
<td></td>
</tr>
<tr>
<td></td>
<td>changes to facilitate mixed use.</td>
<td></td>
</tr>
<tr>
<td>C</td>
<td>Pacheco Elementary Site</td>
<td>--</td>
</tr>
<tr>
<td></td>
<td>Removed from consideration.</td>
<td></td>
</tr>
<tr>
<td>D</td>
<td>Diocese Site near Bressi Pl. &amp; Broad St.</td>
<td>--</td>
</tr>
<tr>
<td></td>
<td>Removed from consideration.</td>
<td></td>
</tr>
<tr>
<td>E</td>
<td>Upper Monterey Area</td>
<td>No land use changes</td>
</tr>
<tr>
<td></td>
<td>No physical land use changes proposed.</td>
<td>changes proposed</td>
</tr>
<tr>
<td></td>
<td></td>
<td>No land use changes</td>
</tr>
<tr>
<td></td>
<td></td>
<td>proposed</td>
</tr>
<tr>
<td>F</td>
<td>Downtown Area</td>
<td>No land use changes</td>
</tr>
<tr>
<td></td>
<td>No physical land use changes proposed.</td>
<td>changes proposed</td>
</tr>
<tr>
<td></td>
<td></td>
<td>No land use changes</td>
</tr>
<tr>
<td></td>
<td></td>
<td>proposed</td>
</tr>
<tr>
<td>G</td>
<td>Mid-Higuera Area</td>
<td>No land use changes</td>
</tr>
<tr>
<td></td>
<td>No physical land use changes proposed.</td>
<td>changes proposed</td>
</tr>
<tr>
<td></td>
<td></td>
<td>No land use changes</td>
</tr>
<tr>
<td></td>
<td></td>
<td>proposed</td>
</tr>
<tr>
<td>H</td>
<td>Caltrans Site</td>
<td>53 121 101,943 185</td>
</tr>
<tr>
<td></td>
<td>Mixed use to include tourist commercial,</td>
<td></td>
</tr>
<tr>
<td></td>
<td>office and some residential. Site may be</td>
<td></td>
</tr>
<tr>
<td></td>
<td>appropriate to review height limit changes</td>
<td></td>
</tr>
<tr>
<td></td>
<td>to accommodate desired development. Consider</td>
<td></td>
</tr>
<tr>
<td></td>
<td>more public open space uses to serve as</td>
<td></td>
</tr>
<tr>
<td></td>
<td>gateway and uses compatible with conference</td>
<td></td>
</tr>
<tr>
<td></td>
<td>facilities.</td>
<td></td>
</tr>
<tr>
<td>I</td>
<td>General Hospital Site</td>
<td>41 94 48,788 89</td>
</tr>
<tr>
<td></td>
<td>Residential development on the site behind</td>
<td></td>
</tr>
<tr>
<td></td>
<td>existing structure within the existing Urban</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Reserve Line. Outside the Urban Reserve Line</td>
<td></td>
</tr>
<tr>
<td></td>
<td>retain the current designation of Open Space.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Policies should support flexibility so that a</td>
<td></td>
</tr>
<tr>
<td></td>
<td>range of residential uses can be considered</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(i.e. residential care, adjunct to transitional</td>
<td></td>
</tr>
<tr>
<td></td>
<td>care use, other residential uses consistent with area)</td>
<td></td>
</tr>
<tr>
<td>Site Letter</td>
<td>Site Description</td>
<td>Site Description Details</td>
</tr>
<tr>
<td>-------------</td>
<td>------------------</td>
<td>--------------------------</td>
</tr>
<tr>
<td>J</td>
<td><strong>Broad Street Area</strong></td>
<td>Incorporate physical alternative described in South Broad Street Area Plan endorsed on September 17, 2013 by City Council (Council Resolution 10460).</td>
</tr>
<tr>
<td>K</td>
<td><strong>Sunset Drive-In/Prado Road Site</strong></td>
<td>Consideration of mixed use. Develop policies to address appropriate mix of uses. Policy discussion should address historic nature of Sunset Drive in and ensure the site is able to accommodate Homeless Services center. Provide bike connections as called for in bicycle transportation plan.</td>
</tr>
<tr>
<td>L</td>
<td><strong>San Luis Ranch Specific Plan Area</strong></td>
<td>Consideration of a mix of uses with a substantial open space/agriculture component. Residential uses to be consistent with applicable airport policies.</td>
</tr>
<tr>
<td>M</td>
<td><strong>Pacific Beach Site</strong></td>
<td>Policy development to support consideration of Commercial Retail/mixed use fronting LOVR and Froom Ranch and park to serve neighborhood.</td>
</tr>
<tr>
<td>N</td>
<td><strong>Calle Joaquin Auto Sales Area</strong></td>
<td>Consideration of mixed use in the context with the Dalidio property and the City's agricultural parcel and focus on connectivity to the neighborhoods to the north. Develop policies to address appropriate mix of uses.</td>
</tr>
<tr>
<td>O</td>
<td><strong>Madonna Specific Plan Area</strong></td>
<td>Future development to consider viewsheds, hillside and open space protection, height limits, wetland protection, access to other connections, historic farm buildings, mixed use to accommodate workforce housing, and neighborhood commercial type uses.</td>
</tr>
<tr>
<td>P</td>
<td><strong>LOVR Creekside Area</strong></td>
<td>Consideration of medium high density residential infill housing with open space.</td>
</tr>
<tr>
<td>Q</td>
<td><strong>Margarita Specific Plan</strong></td>
<td>Policy to support consideration of changes to the previously approved Specific Plan to allow increased density on eastern portion of specific plan site.</td>
</tr>
<tr>
<td>Site Letter</td>
<td>Site Description</td>
<td>Units</td>
</tr>
<tr>
<td>------------</td>
<td>----------------------------------------------------------------------------------</td>
<td>-------</td>
</tr>
<tr>
<td>R</td>
<td>Broad St. @ Tank Farm Rd. Site</td>
<td>41</td>
</tr>
<tr>
<td></td>
<td>Consideration of a mix of commercial uses with limited residential on upper floors. Commercial uses should serve the surrounding businesses and bicycle and pedestrian connectivity must be addressed.</td>
<td></td>
</tr>
<tr>
<td>S</td>
<td>Avila Ranch Specific Plan Area</td>
<td>700</td>
</tr>
<tr>
<td></td>
<td>Consider a mix of residential densities, connections to shops to the north, connection to S. Higuera and a mix of uses. Respect creek/wildlife corridor.</td>
<td></td>
</tr>
</tbody>
</table>

Source: Matrix Design Group, 2014; Mintier Harnish, 2014

The policy and program updates proposed in the Airport Chapter of the Land Use Element reflect airport safety, noise, height and overflight considerations consistent with the purposes of the State Aeronautics Act. Policies, programs, and Zoning Code implementation have been drafted to create an Airport Overlay Zone to codify airport compatibility criteria for areas subject to airport influence consistent with the requirements of Cal. Pub. Utilities Code Section 21670, et. seq, the California Airport Land Use Planning Handbook, and other related federal and state requirements relating to airport land use compatibility planning. These include allowable uses and development standards such as density and intensity limitations, identification of prohibited uses, infill development, height limitations, and other hazards to flight, noise insulation, buyer awareness measures, airspace protection, nonconforming uses and reconstruction, and the process for airport compatibility criteria reviews by the City.

The Circulation Element Update describes how the City plans to provide for the transportation of people and materials within San Luis Obispo with connections to other areas in San Luis Obispo County and beyond. The Circulation Element Update recognizes the implications of land use policy on all modes of movement, and establishes policies, standards, and implementation measures that work with the Land Use Element to address both existing and potential circulation opportunities and deficiencies. But beyond addressing changes in land use, the Circulation Element Update also looks at the circulation system of the community as a whole. Introducing the concept of “complete streets”, the update looks to integrate and enhance all types of circulation in order to create a more comprehensive and functional circulation system.

The proposed Circulation Element provides policy language to address a variety of circulation-related issues, including: traffic reduction; transit; encouraging the use of bicycles and walking; traffic management; future street network changes; truck, air and rail transportation; parking management in commercial areas and residential neighborhoods; and scenic roadways. A new section added to the Circulation Element addresses multi-modal transportation, or the development and maintenance of a circulation system that balances the needs of all modes of travel.

As part of the LUCE Update, a comprehensive list of circulation improvements to be considered (called the “project description”) was reviewed and approved for further analysis by the City Council. This list also included variations of those improvements. Appendix N provides the sensitivity analysis performed on those individual variations. The results of this sensitivity analysis were then used by the City to determine which variations would be included as part of the Proposed Project presented in the EIR. From this analysis, the City identified 17 circulation improvements to include in the Proposed Project. These are listed on the following table. The table below lists the 17 proposed “physical alternative” street network modifications identified by the Circulation Element Update public participation and Element preparation process.
<table>
<thead>
<tr>
<th>Site Number</th>
<th>Site Description</th>
</tr>
</thead>
</table>
| 1 | Boysen Ave. and Santa Rosa St.  
Consideration of separated crossing for bikes/pedestrians of Santa Rosa at Boysen. Consider all vehicular alternatives for Boysen intersection at SR 1 including full closure, access restrictions, and retaining its current configuration. |
| 2 | Realign Chorro St., Boysen Ave., and Board St.  
Consideration of realignment of Chorro and Broad and Boysen. |
| 3 | Potential Ramp Closures at Highway 101 and State Route 1  
Consideration of ramp closures and consolidated SR1/Highway 101 interchange including the need for a signage/way-finding program. |
| 4 | Broad St. and Highway 101 Ramp Closures  
Consideration of ramp closures at Broad with the addition of bike and pedestrian overpass. |
| 5 | Convert Marsh St. and Higuera St. to Two-way  
(Santa Rosa St. to California Blvd.)  
Consideration of two way vehicular circulation of Marsh and Higuera between Santa Rosa and California. |
| 6 | Transit Center Location on Santa Rosa St. and Higuera St.  
Consideration of site/block of Higuera/Santa Rosa/Monterey for the transit center location and consider use of both public and private property. Consider ideas from student projects and the Downtown Concept Plan. |
| 7 | Mission Plaza “Dog Leg”  
Consideration of several design alternatives with varying degrees of streets affected. Analyze full closure of roadways. Develop policy direction regarding desired outcomes and nature and phasing of treatment for the area. |
| 8 | Realign Bianchi Ln. and Pismo St.  
Consideration of realignment of street intersection (Pismo to Bianchi). |
| 9 | Realign Madonna Rd. to Bridge St Instead of Higuera St.  
Consider appropriate connection from Madonna to S. Higuera associated with redevelopment of Caltrans site. Potential to realign Madonna to connect with Bridge Street may better address some pedestrian and bike connections. |
| 10 | Bishop St. Extension  
Evaluate elimination of Bishop Street bridge over railroad tracks and consider reducing the width of Johnson Ave. |
| 11 | Victoria Ave. Connection to Emily St.  
Consideration of Victoria connection to Emily. |
| 12 | Broad St. – Consolidate Access  
Consideration of Broad Street consolidation of access points. |
| 13 | Orcutt Rd. Overpass  
Keep facility as part of Circulation Element. Do not consider removing facility due to concerns about increasing rail traffic. |
| 14 | Froom Rd. Connection to Oceanaire Neighborhood  
Provide pedestrian and bicycle connectivity only. |
| 15 | Prado Rd. Interchange vs. Overpass  
Evaluate both interchange and overpass |
| 16 | North-South Connection between Tank Farm Rd. and Buckley Rd.  
Consideration creating a north-south connection between Tank Farm and Buckley for future connectivity. |
| 17 | LOVR Bypass  
Consider (Buckley to Higuera connection and Higuera to LOVR behind Los Verdes - 101 bypass. |

*Source: Matrix Design Group, 2014; Mintier Harnish, 2014*
ES-2  Project Objectives

Land Use Element Update
For the purposes of CEQA analysis, the objectives of the Land Use Element Update are to:
1. Respond to changed conditions in San Luis Obispo.
2. Incorporate sustainable practices and policies into the Land Use Element.
3. Respond to new State planning requirements.
4. Engage the community in a reaffirmation of the community’s vision and goals for the City's future.
5. Provide residential infill opportunities.
6. Maintain a healthy and attractive natural environment within a compact urban form.

Circulation Element Update
For the purposes of CEQA analysis, the objectives of the Circulation Element Update are to:
1. Encourage better transportation habits.
2. Promote alternative forms of transportation.
3. Manage traffic by limiting population growth and economic development to the rates and levels stipulated by the Land Use Element.
4. Support environmentally sound technological advancement.
5. Support a shift in modes of transportation.
6. Establish and maintain livable street corridors.
7. Support the development and maintenance of a circulation system that supports and balances the needs of all circulation modes.

ES.3  Summary of Impacts and Mitigation Measures

Table EXES-1, at the end of this section, contains a detailed listing of the environmental impacts of the proposed project, proposed mitigation measures, and residual impacts. Impacts are categorized by classes: Class I impacts are defined as significant, unavoidable adverse impacts, which require a statement of overriding considerations pursuant to Section 15093 of the CEQA Guidelines if the project is approved. Class II impacts are significant adverse impacts that can be feasibly mitigated to less than significant levels and which require findings to be made under Section 15091 of the CEQA Guidelines. Class III impacts are adverse, but less than the identified significance thresholds.

ES.4  Alternatives

Section 15126.6(a) of the CEQA Guidelines states that:

“an EIR shall describe a range of reasonable alternatives to the project or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.”

As stated above, the development on an EIR is to include consideration of a “reasonable range” of alternatives to foster informed decision-making and public participation.

CEQA requires the EIR to identify feasible alternatives to the proposed project that will avoid, or at least lessen, significant impacts associated with the project. CEQA defines “feasible” as follows:

“Feasible’ means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social and technological factors.”
Three alternatives to the LUCE Update project have been evaluated in this EIR. Each alternative is described below.

**No Project Alternative:** This alternative evaluates environmental conditions that would result if the proposed LUCE Update Project were not implemented and future development in the City was implemented consistent with the land use and policy requirements of the existing 1994 Land Use Element and Circulation Elements.

**Reduced Development Alternative:** This alternative evaluates environmental conditions that would result if the development capacity proposed by the Land Use Element Update were reduced by approximately 20 percent.

**Maximum Circulation Improvements Alternative:** This alternative evaluates the environmental conditions that would result if three additional modifications were added to the proposed LUCE Update. These modifications include the reintroduction of two circulation improvements that were removed from the EIR traffic modeling (the “Vachel Lane Realignment” and “Calle Joaquin Connector to Dalidio Drive” improvements) and a revised version of the “Buckley Road to Los Osos Valley Road Connection” improvement. The three additional street network changes added to the Maximum Circulation Improvements Alternative were options identified during the preliminary public review of potential street system changes but were not included in the proposed Circulation Element traffic modeling.

**Environmentally Preferred Alternative:** Buildout of the No Project Alternative would generally reduce the environmental impacts that would have the potential to occur if buildout of the City of San Luis Obispo was conducted in accordance with the requirements of the existing 1994 Land Use and Circulation Elements of the general plan. Implementation of the No Project Alternative, however, would not implement the beneficial policy revisions proposed by the LUCE Update. Based on the potential for the No Project Alternative to reduce environmental impacts when compared to the impacts of the proposed Project, it would be the environmentally superior alternative. The No Project alternative, however, would not implement any of the proposed projects’ objectives. CEQA Guidelines Section 15126.6(e)(2) indicates that “if the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify the environmentally superior alternative among the other alternatives.”

The Reduced Development Alternative would generally have reduced or similar environmental impacts when compared to the impacts of the proposed project. The Reduced Development Alternative, however, would not implement the environmental objectives of the proposed LUCE Update. A reduction in development in the proposed specific plan areas would be inconsistent with the objective to protect the environment within a compact urban form because developing the specific plan areas at densities that are substantially less than their capacity could promote additional development in other areas, such as unincorporated areas adjacent to the city. A reduction in development in the proposed special planning areas would have the potential to reduce environmental impacts, however decreased development those areas would not fully achieve the Land Use Element Update objective of promoting infill development. Reduced residential and non-residential density could be inconsistent with the implementation of State-mandated planning requirements, such as the requirements of Senate Bill (SB) 375. This bill provides a mechanism for more sustainable and efficiently-planned transportation infrastructure, reduced greenhouse gas emissions and improved compatibility with land uses. A substantial reduction in future development density may impede the attainment of requirements to provide transportation-oriented development, would not respond to this State planning requirement, and would be inconsistent with the Land Use Element objective of incorporating sustainable practices into the Land Use Element.

The Maximum Circulation Improvements Alternative would provide three street system modifications not included in the proposed Circulation Element Update impact analysis. This alternative would generally result in environmental impacts that are similar to the proposed Project, but would have fewer air quality, greenhouse gas emission, and traffic impacts due to more free–flowing traffic circulation conditions. This alternative would also have the potential to result in increased cultural resource and noise impacts along portions of one of the alternative roadway system projects; however, it is likely that those impacts could be reduced to a less than significant level with the implementation of appropriate design and other mitigation measures. The Maximum Circulation Improvements Alternative would result in substantial and area-wide environmental benefits and would not impede the implementation of proposed Land Use and Circulation Element Update objectives. As stipulated under CEQA Guidelines §§15126.6(e), an EIR must evaluate the environmental effects of project (or plan) alternatives, compare these effects to those of the proposed project, and identify the environmentally superior alternative. Based on the reasons discussed above, Therefore, the Maximum Circulation Improvements Alternative would be the environmentally superior alternative to the proposed project that fulfills the basic objectives of the proposed LUCE Update.
ES.5 Incorporation of Studies, Reports and Other Documents

This EIR contains references to studies, reports and other documents that were used as a basis for, or a source of, information summarized in the body of the EIR. These documents are incorporated by reference in this EIR in accordance with Section 15150 of the CEQA Guidelines. Where a study, report or document is briefly cited or referred to for convenience in the body of this EIR, the reader should consult the “References and Preparers” section of this document for the full citation. It is important to note that the bulk of the references used for this EIR are pulled forward from Appendix D, Background Report (Volume III of this EIR).

ES.6 Areas of Public Controversy

Pursuant to State CEQA Guidelines § 15123(b)(2), this EIR acknowledges the areas of controversy and issues to be resolved which are known to the City of San Luis Obispo or were raised during the scoping process. No areas of substantial controversy were raised in response to the Notice of Preparation that was circulated Thursday, December 5, 2013 with a required comment period originally set to end on Friday, January 10, 2014, but extended by the City until Friday, January 24, 2014. However, the City received comments letters identifying a number of issues of concern in response to the NOP and the public scoping meeting held in association with the regularly scheduled Planning Commission on Wednesday, January 8, 2014.

As a result of the publishing of the NOP and the City’s outreach to the public and regulatory agencies, the City received valuable input on the contents of the proposed EIR (please refer to Appendix E, Volume IV, of this EIR for a copy of all NOP comments received and associated responses). This includes:

Regulatory Agency Comments

APCD: General comments concerning the responsibility for future development under the LUCE Update to ensure the proper construction and operational permits are received prior to development, and the necessary environmental information is provided that will be needed for the APCD to make determinations on impacts resulting from potential future development.

CalTrans: General comments concerning the responsibility to work with the Airport Land Use Commission on the development of the LUCE Update, and the requirements to provide adequate environmental analysis for future projects within the Airport Land Use Plan area.

ALUC: Comments concerning project consistency with the ALUP, recommendations for environmental issue areas that should be addressed through the EIR process, a needs assessment for residential growth, and analysis of a limited growth EIR alternative.

Other Agencies/Offices

San Luis Obispo Chamber of Commerce: Comments concerning a need to focus on the City’s jobs/housing balance and recommendations for land use amendments to specific areas in the city related to increased residential development opportunities. This includes general comments regarding the need for increased housing. No comments on the nature of the environmental impact analysis.

Public Comments

General comments include area-specific concerns regarding various environmental issues effecting current city residents and a general concern over the existing state of the city's environmental resources. General concern about circulation changes to the South Broad Street Area and concern regarding including impacts related to diverting collector traffic onto residential streets. Comments also include a request for a complete impact assessment of a future extension of Prado Road and an assessment of impacts relating to the Chevron Tank Farm Remediation and Redevelopment project as well as the potential Johnson Avenue development project on SLCUSD property. Comments also include general recommendations on development within the identified Specific Plan Areas.
### Table ES-1. Summary of Significant and Unavoidable Impacts, Mitigation Measures and Significance After Mitigation

<table>
<thead>
<tr>
<th>Impact</th>
<th>Mitigation Measures</th>
<th>Significance After Mitigation</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Class I: Significant and Unavoidable Impacts</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Air Quality</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Impact AQ-2 (Long-Term)</td>
<td>With regards to criteria air pollutants and precursors implementation of the LUCE Update would not be consistent with the assumptions contained in the most recent version of the APCD’s Clean Air Plan even with the incorporation of the proposed LUCE Update policies and existing City policies. Thus, long-term air quality impacts are considered Class I, significant and unavoidable.</td>
<td>Significant and unavoidable.</td>
</tr>
<tr>
<td><strong>Land Use</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Impact LU-1</td>
<td>No mitigation measures have been identified to reduce potential inconsistencies with the existing ALUP to a less than significant level.</td>
<td>The proposed Project has the potential to be found inconsistent with the existing ALUP by the Airport Land Use Commission. While physical environmental impacts of safety and noise have not been identified for the LUCE update from existing or future airport operations as described in the adopted Airport Master Plan, development envisioned in the proposed Project presents a conflict with the ALUP.</td>
</tr>
<tr>
<td>Impact</td>
<td>Mitigation Measures</td>
<td>Significance After Mitigation</td>
</tr>
<tr>
<td>------------------------------</td>
<td>--------------------------------------------------------------------------------------</td>
<td>------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td><strong>Noise</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Impact N-1</strong></td>
<td>Short-Term Construction Noise Levels. Implementation of development projects under the proposed LUCE Update would involve construction that could generate noise levels that exceed applicable standards for mobile construction equipment in the City’s Noise Control Ordinance and result in temporary substantial increases in noise levels primarily from the use of heavy-duty construction equipment (see thresholds a and c). Even with the incorporation of the proposed LUCE Update policies and existing City policies, short-term construction noise levels are considered Class I, significant and unavoidable.</td>
<td>With the implementation of feasible construction noise reduction measures and exemptions, construction activities could still exceed applicable standards especially if activities are near existing receptors and/or occur during the nighttime. Thus, short-term construction noise levels are considered Class I, significant and unavoidable.</td>
</tr>
<tr>
<td><strong>Traffic And Circulation</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Impact CIR-1</strong></td>
<td>Development and street network changes under the LUCE Update will cause roadways currently operating at LOS D or better to deteriorate to LOS E or F, in downtown San Luis Obispo, roadways operating at LOS E or better will deteriorate to LOS F, or will add additional traffic to roadways operating at LOS E (outside of downtown) or F (in downtown). This is considered a Class I, significant and unavoidable impact.</td>
<td>Implementation of proposed and existing policies would not fully mitigate the impact, so the impact would remain potentially significant and unavoidable.</td>
</tr>
<tr>
<td><strong>Impact CIR-2</strong></td>
<td>Development and street network changes under the LUCE Update will cause intersections currently operating at LOS D or better to deteriorate to LOS E or F, in downtown San Luis Obispo, intersections operating at LOS E or better will deteriorate to LOS</td>
<td>The following mitigation measures would be options to mitigate impacts for these intersections to meet the LOS standard. It should be noted that installing a signal to mitigate an LOS impact would be contingent on the intersection meeting signal warrants per the MUTCD under future year conditions. However, the decision to install a traffic signal should not be based solely upon a single warrant. Delay, congestion, driver confusion, future</td>
</tr>
</tbody>
</table>

With the implementation of feasible construction noise reduction measures and exemptions, construction activities could still exceed applicable standards especially if activities are near existing receptors and/or occur during the nighttime. Thus, short-term construction noise levels are considered Class I, significant and unavoidable.
F, or will add additional traffic to intersections operating at LOS E (outside of downtown) or F (in downtown). Impact is considered to be Class I, significant and unavoidable.

<table>
<thead>
<tr>
<th>Impact</th>
<th>Mitigation Measures</th>
<th>Significance After Mitigation</th>
</tr>
</thead>
<tbody>
<tr>
<td>F</td>
<td>Install increased traffic control (traffic signal or roundabout).</td>
<td>Funding constraints. Therefore, the impact remains significant and unavoidable.</td>
</tr>
<tr>
<td>CIR-1. Grand &amp; Slack (#8)</td>
<td>Install increased traffic control (traffic signal or roundabout).</td>
<td></td>
</tr>
<tr>
<td>CIR-2. California &amp; Taft (#12)</td>
<td>Install increased traffic control (traffic signal or roundabout).</td>
<td></td>
</tr>
<tr>
<td>CIR-4. San Luis &amp; California (#55)</td>
<td>Install increased traffic control (traffic signal or roundabout).</td>
<td></td>
</tr>
<tr>
<td>CIR-5. Higuera &amp; Tank Farm (#85)</td>
<td>Add NB right-turn lane, WB dual right-turn lanes, two-way left-turn lane on Tank Farm between Higuera and Long.</td>
<td></td>
</tr>
<tr>
<td>CIR-6. Broad &amp; High (#89)</td>
<td>Install increased traffic control (traffic signal or roundabout).</td>
<td></td>
</tr>
<tr>
<td>CIR-7. Broad &amp; Rockview (#94)</td>
<td>Install downstream signal at Broad &amp; Capitolio.</td>
<td></td>
</tr>
<tr>
<td>CIR-8. Broad &amp; Capitolio (#95)</td>
<td>Install increased traffic control (traffic signal or roundabout).</td>
<td></td>
</tr>
<tr>
<td>CIR-10. Broad &amp; Tank Farm (#98)</td>
<td>Establish time-of-day timing plans.</td>
<td></td>
</tr>
</tbody>
</table>
Table ES-2. Summary of Significant but Mitigable Impacts, Mitigation Measures and Significance After Mitigation

<table>
<thead>
<tr>
<th>Impact</th>
<th>Mitigation Measures</th>
<th>Significance After Mitigation</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Impact CIR-3</strong>&lt;br&gt;Development under the LUCE Update will increase traffic on freeway facilities. Impact is considered to be Class I, significant and unavoidable.</td>
<td>As future development under the LUCE Update is proposed, the City will be required to ensure consistency with the General Plan and the policies/programs listed above. However, with the incorporation of the Proposed Project, adherence to proposed and existing City policies and programs discussed above, and continued support of Caltrans’ and SLOCOG’s and SLORTA’s efforts to address demand on US 101 in the vicinity of San Luis Obispo, these mitigation measures would not mitigate the impacts and widening to 6 lanes is not feasible.</td>
<td>Given that there are no feasible mitigation measures under the City’s purview apart from implementation of the Proposed Project policies and programs, or no enforceable plan or program that is sufficiently tied to the actual mitigation of the traffic impacts at issue, this impact is significant and unavoidable.</td>
</tr>
</tbody>
</table>

**Agricultural Resources**

<table>
<thead>
<tr>
<th>Impact AG-2</th>
<th>Mitigation Measures</th>
<th>Significance After Mitigation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Future development in accordance with the LUCE Update could occur on prime farmland, unique farmland, and/or farmland of statewide importance. Buildout within the City Limits would result in Class II, significant but mitigable impacts to agricultural conversion.</td>
<td>In order to ensure that prime farmland is protected upon implementation of the proposed LUCE Update, the following LUCE Update policy edits shall be required: &lt;br&gt;&lt;br&gt;&lt;strong&gt;AG-1 1.7.1 Open Space Protection&lt;/strong&gt; &lt;br&gt;Within the City’s planning area and outside the urban reserve line, undeveloped land should be kept open. Prime agricultural land, productive agricultural land, and potentially productive agricultural land should/shall be protected for farming. Scenic lands, sensitive wildlife habitat, and undeveloped prime agricultural land should/shall be permanently protected as open space.</td>
<td>Implementation of proposed and existing policies and reliance on establishment of project-specific mitigation measures where appropriate would reduce potential impacts to a less than significant level.</td>
</tr>
<tr>
<td>Impact</td>
<td>Mitigation Measures</td>
<td>Significance After Mitigation</td>
</tr>
<tr>
<td>--------</td>
<td>---------------------</td>
<td>-----------------------------</td>
</tr>
<tr>
<td><strong>Air Quality</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Impact AQ-1 (Short-Term)</strong></td>
<td>Implementation of the LUCE Update would involve construction of development projects that generate short-term emissions of criteria air pollutants and ozone precursors. Emissions from individual construction projects could exceed APCD’s project-level significance thresholds. Thus, implementation of the LUCE Update could result in construction-generated emissions that violate or contribute substantially to an existing or projected air quality violation, contribute a cumulatively considerable net increase of criteria air pollutants for which the region is designated as non-attainment, and/or expose sensitive receptors to substantial pollutant concentrations. Adherence to relevant policies and implementation of APCD-recommended project-specific mitigation measures would reduce potential short-term impacts to a less-than-significant level. Thus, construction-generated air quality impacts are considered Class II, significant but mitigable.</td>
<td>APCD specifies construction mitigation measures designed to reduce emissions of ROG, NOx, PM10, and PM2.5 (both fugitive and exhaust). These include standard mitigation measures, best available control technology (BACT), and construction activity management plan (CAMP) and off-site mitigation for construction equipment emissions; along with short and expanded lists for fugitive dust emissions. The City shall ensure the implementation of the most current APCD-recommended construction mitigation measures to reduce construction-generated emissions to less-significant levels as defined by APCD.</td>
</tr>
<tr>
<td>Impact</td>
<td>Mitigation Measures</td>
<td>Significance After Mitigation</td>
</tr>
<tr>
<td>--------</td>
<td>---------------------</td>
<td>------------------------------</td>
</tr>
<tr>
<td><strong>Cultural Resources</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
| **Impact CR-1** | Development facilitated by the LUCE Update could adversely affect historical resources. In order to better facilitate the protection of the city’s historical resources and reduce potential impacts to less than significant levels, the following changes to the City’s General Plan Conservation and Open Space Element policies/programs shall be required:  
**CR-1 3.3.2 Demolitions** Historically or architecturally significant buildings should not be demolished or substantially changed in outward appearance, unless doing so is necessary to remove a threat to health and safety and other means to eliminate or reduce the threat to acceptable levels is infeasible.  
**CR-2 3.3.5** Historic districts and neighborhoods. In evaluating new public or private development, the City shall identify and protect neighborhoods or districts having historical character due to the collective effect of Contributing or Master List historic properties.  
**CR-3 3.5.10 Southern Pacific Water Tower** The historic Southern Pacific Water Tower and adjoining City-owned land should be maintained as open space or parkland. | Implementation of proposed and existing policies, reliance on establishment of project-specific mitigation measures where appropriate, and incorporation of the required policy/program language changes will reduce potential impacts to a less than significant level. |
| **Public Services** | | |
| **Impact PS-1** | The following policy shall be added to the proposed Land Use Element prior to adoption:  
**PS-1 New Policy** Development should be approved only when adequate fire suppression services and facilities are available or will be made available concurrent with development, considering the setting, type, intensity, and form of the proposed development. | Implementation of the proposed mitigation measure and Land Use Element policy would require the development of a new fire station in the southern portion of the city prior to or in conjunction with the development of the Avila Ranch Specific Plan. The construction and operation of a new fire station would be required to comply with applicable regulatory requirements, City development review policies and requirements, and may be subject to the implementation of additional mitigation measures identified by a project-specific environmental review. With the implementation of |
<table>
<thead>
<tr>
<th>Impact</th>
<th>Mitigation Measures</th>
<th>Significance After Mitigation</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>the proposed mitigation measure and existing development review requirements, the proposed Land Use Element Update would result in less than significant adverse physical impacts associated with the provision of new or altered facilities needed to achieve consistency with the City's fire response standard.</td>
</tr>
</tbody>
</table>

**Table ES-3. Less Than Significant Impacts, Mitigation Measures and Significance After Mitigation**

<table>
<thead>
<tr>
<th>Impact</th>
<th>Mitigation Measure</th>
<th>Significance After Mitigation</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Aesthetics</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Impact AES-1</strong></td>
<td>Development under the LUCE Update would introduce new development along viewing corridors and scenic roadways, including state scenic highways, in the San Luis Obispo area. This could have a substantial adverse effect on scenic resources or an identified visual resource or scenic vista from a public viewing area. With the incorporation of the proposed LUCE Update policies and existing City policies, potential impacts to such views are considered Class III, less than significant.</td>
<td>None required.</td>
</tr>
<tr>
<td><strong>Impact AES-2</strong></td>
<td>The LUCE Update emphasizes both reuse of existing urbanized lands, infill development on vacant parcels, and new development on vacant parcels near urban areas. The development of such areas could degrade the existing visual character and its surroundings. With the incorporation of the proposed LUCE Update and existing City policies and programs, potential impacts related to existing visual character changes are considered Class III, less than significant.</td>
<td>None required.</td>
</tr>
<tr>
<td><strong>Impact AES-3</strong></td>
<td>Proposed development in accordance with the LUCE Update would introduce new sources of light and glare. However, adherence to policies included in the Zoning Ordinance and Community Design Guidelines would reduce potential impacts to a Class III, less than significant, level.</td>
<td>None required.</td>
</tr>
<tr>
<td>Impact</td>
<td>Mitigation Measure</td>
<td>Significance After Mitigation</td>
</tr>
<tr>
<td>--------</td>
<td>--------------------</td>
<td>-------------------------------</td>
</tr>
<tr>
<td><strong>Agricultural Resources</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
| **Impact AG-1**  
The LUCE Update could alter the existing land use and zoning on sites throughout the city and may result in incompatibilities with adjacent urban and agricultural uses. However, the General Plan reduces land use conflicts through policies and plan review. Therefore, impacts that would occur from development would be Class III, less than significant. | None required | Less than significant. |
| **Biological Resources** | | |
| **Impact BIO-1**  
Development under the LUCE Update has potential to impact common habitat types including non-native annual grasslands and disturbed/ruderal areas that provide habitat for common wildlife and plant species. With the incorporation of the proposed LUCE Update policies and existing governing policies, potential impacts to these common habitats are considered Class III, less than significant. | None required. | Less than significant. |
| **Impact BIO-2**  
Development consistent with the LUCE Update has potential to impact four Natural Communities of Special Concern present within the LUCE SOI Planning Subarea including Serpentine Bunchgrass, Northern Interior Cypress Stand, Central Maritime Chaparral, and Coastal and Valley Freshwater Marsh. With the incorporation of the proposed and existing City policies, and the requirements of regulatory and oversight agencies, potential impacts to sensitive habitats are considered Class III, less than significant. | None required. | Less than significant. |
| **Impact BIO-3**  
Development consistent with the LUCE Update has the potential to impact special-status plant species within the LUCE SOI Planning Subarea. With the incorporation of the proposed and existing City policies, and the requirements of regulatory and oversight agencies, potential impacts to special-status plant species are considered Class III, less than significant. | None required. | Less than significant. |
| **Impact BIO-4**  
Development consistent with the LUCE Update has potential to impact special-status wildlife species within the LUCE SOI Planning Subarea. With the incorporation of the proposed and existing City policies, and the requirements of regulatory and oversight agencies, potential impacts to special-status wildlife species are considered Class III, less than significant. | None required. | Less than significant. |
<table>
<thead>
<tr>
<th>Impact</th>
<th>Mitigation Measure</th>
<th>Significance After Mitigation</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Impact BIO-5</strong>&lt;br&gt;Development consistent with the LUCE Update has potential to impact common wildlife species and species of local concern within the LUCE SOI Planning Subarea. With the incorporation of the proposed and existing City policies, and the requirements of regulatory and oversight agencies, potential impacts to common and species of local concern are considered Class III, less than significant.</td>
<td>None required.</td>
<td>Less than significant.</td>
</tr>
<tr>
<td><strong>Cultural Resources</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Impact CR-2</strong>&lt;br&gt;Development facilitated by Land Use and Circulation Element Update could adversely affect identified and previously unidentified archaeological and paleontological resources. This includes potential disturbance of human remains. General Plan policies would ensure that such impacts are addressed on a case-by-case basis. Impacts would be considered Class III, less than significant.</td>
<td>None required.</td>
<td>Less than significant.</td>
</tr>
<tr>
<td><strong>Geology and Soils</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Impact GEO-1</strong>&lt;br&gt;New development under the LUCE Update could be susceptible to impacts from future seismic events, creating the potential for structural damage or health and safety risks. However, compliance with required building codes and implementation of General Plan polices would result in a Class III, less than significant impact.</td>
<td>None required.</td>
<td>Less than significant.</td>
</tr>
<tr>
<td><strong>Impact GEO-2</strong>&lt;br&gt;Future seismic events could result in liquefaction of soils near San Luis Obispo Creek, Prefumo Creek and other low-lying areas. Development in these areas could be subject to liquefaction hazards. The compliance of future development projects with the California Building Code (CBC) and General Plan policies would result in Class III, less than significant impacts.</td>
<td>None required.</td>
<td>Less than significant.</td>
</tr>
<tr>
<td>Impact</td>
<td>Mitigation Measure</td>
<td>Significance After Mitigation</td>
</tr>
<tr>
<td>--------</td>
<td>-------------------</td>
<td>-----------------------------</td>
</tr>
<tr>
<td><strong>Impact GEO-3</strong>&lt;br&gt;Development facilitated by the LUCE Update could occur on soils that have the potential to present natural hazards (expansive soils, erosive soils, and differential settlement) to structures and roadways. Development could also result in the loss of a unique geologic feature. However, compliance of future development projects with the California Building Code and adopted General Plan policies would ensure that resulting impacts are Class III, less than significant.</td>
<td>None required.</td>
<td>Less than significant.</td>
</tr>
<tr>
<td><strong>Impact GEO-4</strong>&lt;br&gt;Steep slopes outside of the existing city limits present potential on- or off-site landslide hazards. In addition to human safety impacts, a landslide has the potential to damage or destroy structures, roadways and other improvements as well as to deflect and block drainage channels, causing further damage and erosion, including loss of topsoil. The compliance of future development projects with the California Building Code (CBC) and General Plan policies would result in Class III, less than significant impacts.</td>
<td>None required.</td>
<td>Less than significant.</td>
</tr>
<tr>
<td><strong>Global Climate Change</strong>&lt;br&gt;Implementation of the proposed LUCE Update could result in an increase in GHG emissions due to short-term construction and long-term operational activities associated with new housing and commercial development, resulting in a cumulatively considerable contribution to the impact of global climate change. However, because the proposed LUCE Update would be consistent with the City’s CAP and incorporates applicable CAP policies and programs that would reduce GHG emissions, this impact would be considered Class III, less than significant.</td>
<td>None required.</td>
<td>Less than significant.</td>
</tr>
<tr>
<td><strong>Hazards and Hazardous Materials</strong>&lt;br&gt;Development facilitated by the LUCE Update could occur near known hazardous material users or result in construction in areas with existing hazardous materials. Implementation of the LUCE Update could expose individuals to health risks due to soil/groundwater contamination or emission of hazardous materials into the air and could impact an adopted emergency response/evacuation plan. With the incorporation of the proposed LUCE Update policies and existing City policies, potential impacts are considered Class III, less than significant.</td>
<td>None required.</td>
<td>Less than significant.</td>
</tr>
<tr>
<td><strong>Impact HAZ-2</strong>&lt;br&gt;Development consistent with the proposed LUCE Update could introduce incompatible residential and commercial land uses into safety zones established through the Airport Land Use Plan and may result in a safety hazard for people residing or working in these areas. Impacts would be Class III, less than significant.</td>
<td>None required.</td>
<td>Less than significant.</td>
</tr>
<tr>
<td>Impact</td>
<td>Mitigation Measure</td>
<td>Significance After Mitigation</td>
</tr>
<tr>
<td>------------------------</td>
<td>--------------------</td>
<td>------------------------------</td>
</tr>
<tr>
<td>Impact HAZ-3</td>
<td>None required.</td>
<td>Less than significant.</td>
</tr>
<tr>
<td>Development consistent with the proposed LUCE Update would introduce residential land uses into areas designated as having a Moderate or High Wildland Fire Hazard, introducing the potential to expose people or structures to a significant risk of loss and/or injury. However, compliance with existing policies and state and local regulations would reduce impacts to a Class III, less than significant level.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Impact HAZ-4</td>
<td>None required.</td>
<td>Less than significant.</td>
</tr>
<tr>
<td>Development facilitated by the LUCE Update could introduce sensitive receptors to additional hazards related to exposure to radiation, electromagnetic fields and hazardous trees. With the incorporation of the proposed LUCE Update policies and existing City policies, potential impacts are considered Class III, less than significant.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Impact HAZ-5</td>
<td>None required.</td>
<td>Less than significant.</td>
</tr>
<tr>
<td>Development under the proposed LUCE Update could potentially introduce sensitive receptors to areas in direct proximity to hazardous materials transportation corridors including the Union Pacific Railroad and Highway 101 and could potentially create a public safety hazard. This is a Class III, less than significant impact.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hydrology and Water Quality</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Impact HWQ-1</td>
<td>None required.</td>
<td>Less than significant.</td>
</tr>
<tr>
<td>New development under the LUCE Update within the 100-year flood plain could be subject to flooding and have the potential to impede or redirect flood flows. However, with implementation of General Plan policies and adherence to the City’s Floodplain Management Regulation impacts related to flooding would be Class III, less than significant.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Impact HWQ-2</td>
<td>None required.</td>
<td>Less than significant.</td>
</tr>
<tr>
<td>Development facilitated by the LUCE Update has the potential to increase the amount of impervious surfaces within the city. This could result in a decrease in percolation to the Groundwater Basin, the alteration of drainage patterns and increases in the volume of surface runoff. Compliance with the City’s Stormwater Management Plan (SWMP) would reduce impacts to a Class III, less than significant level.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Impact HWQ-3</td>
<td>None required.</td>
<td>Less than significant.</td>
</tr>
<tr>
<td>Point and non-point sources of contamination could affect water quality in San Luis Obispo Creek, Prefumo Creek as well as other surface waters and groundwater in the city. However, compliance with existing regulations and implementation of General Plan policies and the City’s Stormwater Management Plan (SWMP) would result in Class III, less than significant impacts.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Impact</td>
<td>Mitigation Measure</td>
<td>Significance After Mitigation</td>
</tr>
<tr>
<td>--------</td>
<td>-------------------</td>
<td>-----------------------------</td>
</tr>
<tr>
<td><strong>Impact HWQ-4</strong>&lt;br&gt;Development facilitated by the LUCE Update has the potential to create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems, resulting in increased stormwater runoff and has the potential to result in the need for additional stormwater infrastructure. Compliance with the City’s Stormwater Management Plan (SWMP), and State regulatory requirements, would reduce impacts to a Class III, less than significant.</td>
<td>None required.</td>
<td>Less than significant.</td>
</tr>
<tr>
<td><strong>Land Use</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Impact LU-1</strong>&lt;br&gt;Aspects of the proposed LUCE Update would conflict with the airport land use plan. However, with the implementation of proposed LUCE Update policies, potential land use conflict impacts would be Class III, less than significant.</td>
<td>No mitigation measures are required because impacts would be less than significant.</td>
<td>The proposed Project includes policies and programs that would ensure the orderly expansion of the airport and provide adequate protection for safety and noise. Impacts would be less than significant without mitigation.</td>
</tr>
<tr>
<td><strong>Impact LU-2</strong>&lt;br&gt;The proposed LUCE Update would have the potential to result in land use conflicts between existing and proposed land uses. With the implementation of proposed LUCE Update policies, potential land use conflict impacts are considered Class III, less than significant.</td>
<td>None required.</td>
<td>Less than significant.</td>
</tr>
<tr>
<td><strong>Impact LU-3</strong>&lt;br&gt;The proposed Land Use Element Update would result in conflicts with applicable habitat conservation plans or natural community conservation plans. With the implementation of proposed LUCE Update policies, potential plan and policy conflict impacts are considered Class III, less than significant.</td>
<td>None required.</td>
<td>Less than significant.</td>
</tr>
<tr>
<td><strong>Impact LU-3</strong>&lt;br&gt;The proposed Circulation Element Update identifies future roadway improvements that would have the potential to result in a significant impact if the improvements would physically divide an established community. This impact is considered Class III, less than significant.</td>
<td>None required.</td>
<td>Less than significant.</td>
</tr>
<tr>
<td><strong>Noise</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Impact N-2</strong>&lt;br&gt;Long-Term Roadway and Railroad Traffic Noise Levels Implementation of the proposed LUCE Update would increase traffic volumes and associated noise levels along major transportation routes. In some instances, traffic-related noise increases could be more than 3 dB, the level typically audible to the human ear and; therefore, considered a substantial increase in noise. New development associated with the proposed LUCE Update</td>
<td>None required.</td>
<td>Less than significant.</td>
</tr>
</tbody>
</table>
could also result in the siting of new sensitive receptors in close proximity to transportation noise sources such as the railroad, with potential to exceed the land use compatibility and transportation noise exposure standards in the existing Noise Element. However, because the City’s Noise Element contains policies and programs that would address and mitigate potential site-specific impacts for individual projects in the future, this impact would be considered Class III, less than significant.

**Impact N-3**
**Exposure of Noise Sensitive Receptors to Stationary Sources.** Implementation of the proposed LUCE Update could increase stationary source noise levels from new development. New development associated with the proposed LUCE Update could also result in the siting of new sensitive receptors in close proximity to these source types, with potential to exceed the land use compatibility and stationary noise exposure standards in the existing Noise Element. However, because the City’s Noise Element contains policies and programs that would address and mitigate potential site-specific impacts for individual projects in the future, this impact would be considered Class III, less than significant.

**Impact N-4**
**Airport Noise Exposure.** Implementation of the proposed LUCE Update would result in the designation of noise-sensitive land uses located within or near the 55 dBA and 60 dBA noise contours of the San Luis Obispo County Regional Airport Land Use Plan. This could result in exposure of people to excessive noise levels. However, with the incorporation of the proposed LUCE Update policies that address airport noise compatibility and consistency with the adopted ALUP, this impact would be considered Class III, less than significant.

**Impact N-5**
**Exposure to Excessive Vibration Levels.** Implementation of the proposed LUCE Update could increase exposure to vibration levels. However, because the City’s ordinance contains and that these sources (existing and proposed) would be anticipated to be minor, this impact would be considered Class III, less than significant.

**Population and Housing**

**Impact PH-1**
The LUCE Update would not result in residential unit development or associated population growth that exceeds an adopted average annual growth rate threshold. Potential population and housing impacts are considered Class III, less than significant.
<table>
<thead>
<tr>
<th>Impact</th>
<th>Mitigation Measure</th>
<th>Significance After Mitigation</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Impact PH-2</strong></td>
<td>None required.</td>
<td>Less than significant.</td>
</tr>
<tr>
<td>The LUCE Update would not result in a substantial displacement of residents or existing housing units. This impact is considered Class III, less than significant.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Public Services</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Impact PS-2</strong></td>
<td>None required.</td>
<td>Less than significant.</td>
</tr>
<tr>
<td>Buildout of the proposed Land Use Element Update would increase the demand for police protection services by increasing population and development in the city. This is a Class III, less than significant impact.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Impact PS-3</strong></td>
<td>None required.</td>
<td>Less than significant.</td>
</tr>
<tr>
<td>Buildout of the proposed Land Use Element Update would increase enrollment in public schools by increasing the population of the city. This is a Class III, less than significant impact.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Impact</td>
<td>Mitigation Measure</td>
<td>Significance After Mitigation</td>
</tr>
<tr>
<td>-----------------</td>
<td>-------------------------------------------------------------------------------------</td>
<td>------------------------------</td>
</tr>
<tr>
<td>Recreation</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Impact REC-1</strong></td>
<td>Buildout of the proposed LUCE Update would increase the population of the city and</td>
<td>Less than significant.</td>
</tr>
<tr>
<td></td>
<td>would facilitate the development of additional parkland. Buildout of the proposed</td>
<td></td>
</tr>
<tr>
<td></td>
<td>LUCE Update would result in a small increase in total per capita parkland in the</td>
<td></td>
</tr>
<tr>
<td></td>
<td>city when compared to existing conditions. Although the LUCE Update would not</td>
<td></td>
</tr>
<tr>
<td></td>
<td>comply with the City’s per capita parkland standard, this would not result in a</td>
<td></td>
</tr>
<tr>
<td></td>
<td>physical effect. Therefore the LUCE Update would result in a Class III, less than</td>
<td></td>
</tr>
<tr>
<td></td>
<td>significant environmental impact related to the increased use of existing park and</td>
<td></td>
</tr>
<tr>
<td></td>
<td>recreation facilities.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>The proposed LUCE Update would result in less than significant recreation-related</td>
<td></td>
</tr>
<tr>
<td></td>
<td>environmental impacts and no mitigation measures are required. Although the LUCE</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Update would result in less than significant environmental impacts related to the</td>
<td></td>
</tr>
<tr>
<td></td>
<td>provision of parkland in the city, the existing condition where the City’s per</td>
<td></td>
</tr>
<tr>
<td></td>
<td>capita parkland standard is not achieved would continue to exist. The City’s per</td>
<td></td>
</tr>
<tr>
<td></td>
<td>capita parkland ratio goal is intended to meet the community’s desire for increased</td>
<td></td>
</tr>
<tr>
<td></td>
<td>recreational opportunities, and is not considered to be a policy adopted for the</td>
<td></td>
</tr>
<tr>
<td></td>
<td>purpose of avoiding or mitigating an environmental effect. Therefore the identified</td>
<td></td>
</tr>
<tr>
<td></td>
<td>inconsistency is not considered to be a significant environmental impact and no</td>
<td></td>
</tr>
<tr>
<td></td>
<td>mitigation is required. Recommendations to address the City’s goals for meeting the</td>
<td></td>
</tr>
<tr>
<td></td>
<td>per capita parkland ratio include, but are not limited to, the following additions</td>
<td></td>
</tr>
<tr>
<td></td>
<td>to the Parks and Recreation Element: Development may be required to fund or</td>
<td></td>
</tr>
<tr>
<td></td>
<td>dedicate parkland greater than what is required through the Quimby Act in order to</td>
<td></td>
</tr>
<tr>
<td></td>
<td>meet the community’s needs and goals for parkland. The City shall pursue a gift of</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Cuesta Park from the County to the City as part of the City’s parkland system.</td>
<td></td>
</tr>
<tr>
<td>Impact</td>
<td>Mitigation Measure</td>
<td>Significance After Mitigation</td>
</tr>
<tr>
<td>--------</td>
<td>--------------------</td>
<td>------------------------------</td>
</tr>
<tr>
<td>Impact REC-2</td>
<td>Buildout of the proposed Land Use Element would potentially provide up to 52.4 acres of new park facilities in the city. The construction and use of the proposed parks would have the potential to result in significant environmental impacts. This is considered a Class III impact, less than significant.</td>
<td>None required.</td>
</tr>
</tbody>
</table>

**Traffic and Circulation**

<p>| Impact CIR-4 | Development under the LUCE Update may increase traffic volumes or traffic speed in designated neighborhood traffic management areas. Impact is considered to be Class III, less than significant. | As future development under the LUCE Update is proposed, the City will be required to ensure consistency with the General Plan and the policies/programs listed above. Therefore, mitigation measures are not required. | Less than significant. |
| Impact CIR-5 | Development under the LUCE Update may encourage increased heavy vehicle traffic on non-designated truck routes. Impact is considered to be Class III, less than significant. | As development under the LUCE Update is proposed, the City will be required to ensure consistency with the General Plan and the policies/programs listed above. Therefore, mitigation measures are not required. | Less than significant. |
| Impact CIR-6 | Development under the LUCE Update will cause increased activity at San Luis Obispo County Regional Airport that may lead to changes in traffic volumes or traffic patterns that result in deteriorated safety conditions. Impact is considered to be Class III, less than significant. | As development under the LUCE Update is proposed, the City will be required to ensure consistency with the General Plan and the policies/programs listed above. Therefore, mitigation measures are not required. | Less than significant. |
| Impact CIR-7 | Development and street network changes and adoption of the policies and programs under the LUCE Update would not conflict with adopted policies that are supportive of increased active transportation. Impact is considered to be Class III, less than significant. | The LUCE Update significantly strengthens the City’s policies on active transportation which will lead to reduced traffic congestion and a healthier population. Therefore, no mitigation measures are required. | Less than significant. |
| Impact CIR-8 | Development and adoption of the policies and programs under the LUCE Update would not conflict with adopted policies that are supportive of increased transit ridership and provision of services. Impact is considered to be Class III, less than significant. | As future development under the LUCE Update is proposed, the City will be required to ensure consistency with the General Plan and the policies/programs listed above. Therefore, mitigation measures are not required. | Less than significant. |</p>
<table>
<thead>
<tr>
<th>Impact</th>
<th>Mitigation Measure</th>
<th>Significance After Mitigation</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Utilities and Service Systems</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Impact USS-1</strong></td>
<td>None required.</td>
<td>Less than significant.</td>
</tr>
<tr>
<td>New development that could occur as a result of the proposed LUCE Update would increase existing water demand. This is a Class III, less than significant impact.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Impact USS-2</strong></td>
<td>None required.</td>
<td>Less than significant.</td>
</tr>
<tr>
<td>New development that could occur as a result of the LUCE Update would generate wastewater flows that exceed the existing capacity of the City’s Water Resource Recovery Facility. This is a Class III, less than significant impact.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Impact USS-3</strong></td>
<td>None required.</td>
<td>Less than significant.</td>
</tr>
<tr>
<td>New development that could be facilitated by the LUCE Update would require the construction of new water and wastewater infrastructure or the replacement of existing infrastructure. The construction or replacement of infrastructure has the potential to result in significant environmental effects. This is a Class III, less than significant impact.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Impact USS-4</strong></td>
<td>None required.</td>
<td>Less than significant.</td>
</tr>
<tr>
<td>New development that could be facilitated by the LUCE Update would increase the demand for solid waste disposal at county landfills. Potential new development would also comply with applicable regulations related to the management of solid waste. As such, solid waste disposal impacts of the LUCE Update are Class III, less than significant impact.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Please see the next page.
During the public review process for the City of San Luis Obispo Land Use and Circulation Elements Update (LUCE Update) Draft Program Environmental Impact Report (Draft EIR), the City of San Luis Obispo received written comments from public agencies, organizations, individuals and Advisory Bodies concerning this document and the recommendations and findings it contains.

The purpose of this Final Program Environmental Impact Report (Final EIR) is twofold. First, this document provides copies of the comment letters made on the LUCE Update and EIR and provides written responses to all environmental issues raised in these comments on the Draft EIR (see Public Resources Code, Section 21091(d)(2)(B); CEQA Guidelines, Section 15088(c)). Second, this document is designed to function as the Final EIR for the Proposed Project, and as such has been designed to meet the content requirements of a Final EIR as specified in the California Environmental Quality Act (CEQA). (See Public Resources Code, Section 21000 et seq. and the CEQA Guidelines [California Code of Regulations, title 14, Section 15000 et seq.]

This Final EIR includes the comments made on the Draft EIR and provides written responses to these comments. The required contents of a Final EIR and the certification process are described below. The Final EIR for the LUCE Update has been prepared in accordance with the guidelines for implementation of CEQA. Specifically, Section 15132 of the State CEQA Guidelines requires that a Final EIR consist of the following:

- The Draft EIR (including any and all technical appendices) or a revision of the draft;
- Comments and recommendations received on the Draft EIR;
- A list of persons, organizations, and public agencies commenting on the Draft EIR;
- The responses of the lead agency to significant environmental concerns raised in the review and consultation process; and
- Any other information added by the lead agency.

The lead agency must “certify” the Final EIR. According to the “CEQA Guidelines”, “certification” consists of three separate steps. Prior to approving a project, the lead agency shall certify that: (1) the final EIR has been completed in compliance with CEQA; (2) the final EIR was presented to the decision-making body of the lead agency and the body has reviewed and considered the information contained in the final EIR prior to approving the project; and (3) that the final EIR reflects the lead agency’s independent judgment and analysis [CEQA Guidelines, Section 15090(a); see also Public Resources Code, Section 21082.1 (c)(3)].

Under CEQA, a lead agency must make certain determinations before it can approve or carry out a project if the EIR reveals that the project will result in one or more significant environmental impacts. First, before approving a project for which a certified final EIR has identified significant environmental effects, the lead agency must make one or more specific written findings for each of the identified significant impacts.

Second, if there remain significant environmental effects even with the adoption of feasible mitigation measures or alternatives, the agency must adopt a “statement of overriding considerations” before it can proceed with the project. The statement of overriding consideration must be supported by substantial evidence in the record (CEQA Guidelines, Sections 15092 and 15093).
These overriding considerations include the economic, legal, social, technological, or other benefits of the proposed project. The lead agency must balance these potential benefits against the project’s unavoidable environmental effects when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits of a proposed project outweigh the unavoidable adverse environmental effects, the lead agency may consider the adverse environmental impacts to be “acceptable” [CEQA Guidelines, Section 15093(a)].

This document is a Final Environmental Impact Report that evaluates the potential environmental effects associated with implementation of the City of San Luis Obispo General Plan Land Use and Circulation Elements (LUCE) Update and includes responses to the comments received during the public review period along with any necessary edits to the text of the Draft EIR.

This section provides a brief introduction of the legal requirements for the certification of a Final EIR and: (1) provides an overview of the background behind the existing General Plan; (2) summarizes the process involved in developing the General Plan Update; (3) describes the purpose of and legal authority of the document; (4) summarizes the scope and content of the EIR; (5) lists lead, responsible, and trustee agencies for the EIR; (6) describes the intended uses of the EIR; and (7) provides a synopsis of the environmental review process required under CEQA.

The contents of the other Final EIR Sections are as follows:

- **Chapter 2, “Response to Comments”** provides a list of commenters and a copy of written comments (coded for reference) received on the Draft EIR during the public review period, and provides the City’s response to each comment received.

- **Chapter 3, “Minor Edits to Draft Program EIR”** includes any corrections and/or additions to the Draft EIR text as a result of comments made on the Draft EIR. These changes to the draft EIR are indicated by revision marks (underline for new text and strikeout for deleted text).

- **Chapter 4, “Report Preparation”** provides a list of the individuals involved in the preparation of the final EIR.

In reference to Section 15132(a) of the State CEQA Guidelines, the Draft EIR for the Proposed Project has been incorporated by reference into this Final EIR.

### 1.1 Overview of the General Plan

State law (Government Code Section 65300) requires that each city and county adopt a comprehensive general plan. The proposed project fulfills this requirement by updating the City’s existing Land Use and Circulation Elements of the General Plan, which was last updated in 1994. The General Plan defines the framework by which the City’s physical and economic resources are to be managed and used in the future. The Land Use and Circulation Elements Update planning horizon is the year 2035. City decision-makers will use the plan as a blueprint for:

- Choices about the use of land
- Protection of environmental resources
- Conservation of neighborhoods and development of new housing
- Provision of supporting infrastructure and public and human services
- Protection of people and property from natural and man-made hazards
- Possible future expansion of City boundaries

The Land Use and Circulation Elements Update clarifies and articulates the City’s intentions with respect to the rights and expectations of the community. Through the LUCE, the City, communicates expectations through goals, policies, and programs for meeting community objectives.
Since the General Plan is the constitution for all future development, any decision by a city affecting land use and development must be consistent with the General Plan. This includes any development projects proposed in the future. An action, program, or project would be considered consistent with the General Plan if, considering all of its aspects; it will further the objectives and policies of the General Plan or not obstruct their attainment.

Each of the General Plan Elements contains objectives and policies to implement the City’s overarching goals. Objectives are statements that provide direction and state the desired end condition. Policies are specific statements that guide decision-making. They indicate a clear commitment by the City and generally serve as mandatory criteria.

In order to update the City’s Land Use and Circulation Elements of the General Plan, the City applied for and was successful in obtaining a sustainable communities grant through the Strategic Growth Council (SGC). Several objectives were identified by the grant and the final LUCE Update contains policies that are based on the following.

- Community input regarding the physical, social, economic, cultural and environmental character of the city in order to develop a vision of San Luis Obispo through the year 2035;
- A comprehensive guide for decision-making based on land use, design, circulation and access, sustainability and the preservation of the quality of life in the community;
- Policies that balance development and conservation to preserve the City’s natural beauty, unique character and heritage while supporting housing opportunities, a vibrant economy and addressing disadvantaged communities;
- Evaluation of consistency with the Regional Blueprint and policies that guide development of a Sustainable Communities Strategy in collaboration with the San Luis Obispo Council of Governments (SLOCOG);
- Opportunities to create a “Complete Streets” circulation system (true multi-modal system);
- Identification of areas appropriate for residential infill and densification;
- Identification of the circulation system that is needed to appropriately balance the community’s values and the need for growth;
- Identification of programs to help migrate to transportation modes other than the single occupant vehicle;
- Identification of transit opportunities that may be enhanced to accommodate Transit Oriented Developments (TOD);
- Identification of ways to achieve more affordable housing; and
- Promotion of energy efficiency & conservation and incorporating Climate Action Plan strategies.

In addition to the grant objectives (as developed by the City), the LUCE Update and associated Program EIR also address the following.

- South Broad Street Corridor Plan: The LUCE Update incorporates a concept plan that addresses residential infill and enhancement of an area of the City currently zoned for commercial service uses. The Program EIR incorporates this plan into the project description.
- Healthy Cities Initiatives: The LUCE Update explores healthy cities initiatives and the link between health and land use planning.
- Pedestrian Circulation Plan: The LUCE Update initiated development of a draft Pedestrian Circulation Plan for the Downtown as part of the Circulation Element update, however this plan will require additional public outreach and refinement prior to evaluation and adoption.
Nightlife Public Safety Assessment: The LUCE Update evaluates type, density, and capacity of various types of alcohol and late-night entertainment establishments that are desirable for the downtown and develop policies to support those findings.

Airport Issues: The LUCE Update includes an updated technical assessment of safety zones around the airport and proposed policy language to promote the use and development of the airport while protecting the health, safety and welfare of the community.

Traffic Congestion Relief: The LUCE Update addresses traffic congestion through efforts such as street modifications, intersection improvements, pedestrian improvements, bicycle facilities, sidewalks, trip reduction programs, traffic signal operations, Los Osos Valley Road interchange, Prado Road construction, and public transit.

Other Transportation Issues: The Circulation Element Update incorporates multi-modal levels of service standards for all modes of transportation including pedestrians, bicycles, and transit. The update shall comply with current regulations such as the Highway Capacity Manual 2010 incorporating pedestrian, bicycle, and transit level of service standards in addition to Complete Streets policies.

LAFCO Sphere of Influence Areas: LAFCO has identified sphere of influence areas for the City of San Luis Obispo. These areas were considered for whether or not to pursue development potential as part of the LUCE update.

### 1.2 General Plan Update Process

The LUCE Update includes proposed changes to the City’s existing Land Use Element and Circulation Elements of the General Plan. The last comprehensive update to the existing Land Use and Circulation Elements occurred in 1994. It is the intent of the proposed Project to establish and implement a refined set of goals, policies, and programs for regulating development in the City, guiding the land use decision-making process, balance population growth with infrastructure availability, and provide a true multimodal transportation system that will guide the community over the next 20 years.

The LUCE Update reflects extensive efforts and input from community surveys, workshops and open houses, advisory bodies, the Task Force for the Land Use and Circulation Element Update (TF-LUCE), City staff, consultants, the Planning Commission, and City Council. Based on direction from the City Council that the Update Project primarily address infill opportunities, changes in legislation, and the need to update existing policy direction to reflect current values and requirements, the LUCE Update focuses on updated policy language and several areas of the City where “physical” land use changes are proposed. The proposed physical land use changes would apply only to specified areas that over the next 20 years may have the potential to accommodate changes in the land use type or intensity or are in need of circulation and infrastructure improvements.

The City's General Plan addresses a Planning Area that extends beyond the current San Luis Obispo city limits. As defined by the California General Plan Guidelines (2003), a Planning Area typically “Encompasses incorporated and unincorporated territory bearing a relation to the city's planning. The planning area may extend beyond the sphere of influence.” While the LUCE Update includes the complete Planning Area, changes in land use and circulation alternatives focused on a smaller, urbanized core area referred to as the LUCE Sphere of Influence Planning Subarea (LUCE SOI Planning Subarea).
1.3 Legal Authority

This EIR has been prepared in accordance with the California Environmental Quality Act (CEQA), the State CEQA Guidelines, and the City’s Rules for the Implementation of CEQA. In accordance with Section 15121 (a) of the State CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3), the purpose of an EIR is to:

Inform public agency decision-makers and the public generally of the significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project.

General Plan Update “Programmatic” EIR. This EIR fulfills the requirements for a Program EIR. Although the legally required contents of a Program EIR are the same as those of a Project EIR, Program EIRs are typically more conceptual and may contain a more general discussion of impacts, alternatives, and mitigation measures than a Project EIR. As provided in Section 15168 of the CEQA Guidelines, a Program EIR may be prepared on a series of actions that may be characterized as one large project. Use of a Program EIR provides the City (as Lead Agency) with the opportunity to consider broad policy alternatives and provides the City with greater ability to address environmental issues and/or cumulative impacts on a comprehensive basis. Agencies generally prepare Program EIRs for programs or a series of related actions that are linked geographically, are logical parts of a chain of contemplated events, rules, regulations, or plans that govern the conduct of a continuing program, or are individual activities carried out under the same authority and having generally similar environmental effects that can be mitigated in similar ways. By its nature, a Program EIR considers the “macro” effects associated with implementing a program (such as a General Plan) and does not, and is not intended to, examine the specific environmental effects associated with specific projects that may be implemented under the General Plan.

Once a Program EIR has been prepared, subsequent activities within the program must be evaluated to determine what, if any, additional CEQA documentation needs to be prepared. If the Program EIR addresses the program’s effects as specifically and comprehensively as possible, many subsequent activities could be found to be within the Program EIR scope and additional environmental review may not be required (CEQA Guidelines Section 15168(c)). When a Program EIR is relied on for a subsequent activity, the Lead Agency must incorporate feasible mitigation measures and alternatives developed in the Program EIR into the subsequent activities (CEQA Guidelines Section 15168(c)(3)). If a subsequent activity would have effects not within the scope of the Program EIR, the Lead Agency must prepare a new Initial Study leading to a Negative Declaration, Mitigated Negative Declaration, or a project level EIR. In this case, the Program EIR still serves a valuable purpose as the first-tier environmental analysis. The CEQA Guidelines (Section 15168(h)) encourage the use of Program EIRs, citing five advantages:

1. Provision of a more exhaustive consideration of impacts and alternatives than would be practical in an individual EIR;
2. Focus on cumulative impacts that might be slighted in a case-by-case analysis;
3. Avoidance of continual reconsideration of recurring policy issues;
4. Consideration of broad policy alternatives and programmatic mitigation measures at an early stage when the agency has greater flexibility to deal with them; and
5. Reduction of paperwork by encouraging the reuse of data (through tiering).

It should be noted that as a “macro” level environmental document, the General Plan EIR uses macro level thresholds as compared to the project-level thresholds that might be used for an EIR on a specific development project. It should not be assumed that impacts determined not to be significant at a macro level would not be significant at a project level. In other words, determination that implementation of the General Plan Update as a “program” would not have a significant environmental effect does not necessarily mean that an individual project would not have significant effects based on project-level CEQA thresholds, even if the project is consistent with the General Plan.
1.4 Scope and Content of the EIR

In accordance with the CEQA Guidelines, a Notice of Preparation (NOP) of a Draft EIR was circulated to potentially interested parties on December 4, 2013. The NOP, included in Appendix E of the Draft EIR, indicated that all issues on the City’s environmental checklist would be discussed in the Draft EIR. These include:

- Aesthetics
- Agriculture Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Geology/Soils
- Hazards & Hazardous Materials
- Hydrology/Water Quality
- Land Use/Planning
- Global Climate Change
- Noise
- Population/Housing
- Public Services
- Recreation
- Traffic/Circulation
- Utilities/Service Systems

This EIR evaluates potential impacts in each of these areas. The focus of this EIR is to:

1. Provide information about the LUCE Update and alternative growth scenarios for consideration by the Planning Commission and the City Council in its selection of an alternative or a combination of various elements from each alternative for approval;

2. Review and evaluate the potentially significant environmental impacts that could occur as a result of the growth and development envisioned in the LUCE Update and different growth scenarios;

3. Identify feasible mitigation measures that may be incorporated into the project in order to reduce or eliminate potentially significant effects;

4. Examine a reasonable range of alternative growth scenarios that could feasibly attain the basic project objectives, while eliminating and/or reducing some or all of the potentially significant adverse environmental effects.

In addition to the public workshops and meetings scheduled throughout the Update process, as advertised on the project website (www.slo2035.com) and through standard City posting methods, a scoping meeting was held in conjunction with the City’s Future Fair 3 Workshop on Saturday, December 7, 2013 at the City/County Library. Five workshop events have been held to get the public’s help in defining the course for the City’s General Plan Update (the last workshop, titled Future Fair 4, was held on May 31, 2014 and included a project update and summary of the work done to date as well as initial traffic modeling information). Future Fair 3 gave the public an opportunity to see, review, and discusses the changes that are being proposed as part of the General Plan Update. City staff and the EIR consultant were present to discuss the scope of the proposed Program EIR and to take input from the public on the Program EIR process and to answer any questions the public had. The City also held an EIR scoping meeting on January 8, 2014 in conjunction with the regular meeting of the City Planning Commission. The City received seven (7) written responses to the NOP. The responses, included in Appendix E, are addressed as appropriate in the analysis contained in the various subsections of Section 4.0, Environmental Impact Analysis.

Please refer to Section 1.8, Organization of the Final EIR, for a discussion of the scope and content of the Final EIR.

1.5 Lead, Responsible, and Trustee Agencies

The City of San Luis Obispo is the lead Agency under CEQA for this EIR because it has primary discretionary authority to determine whether or how to approve the General Plan Land Use and Circulation Elements Update.
Responsible Agencies are other agencies that are responsible for carrying out/implementing a specific component of the General Plan or for approving a project (such as an annexation) that implements the goals and policies of the General Plan. Section 15381 of the State CEQA Guidelines defines a “responsible agency” as:

A public agency which proposes to carry out or approve a project, for which a Lead Agency is preparing or has prepared an EIR or Negative Declaration. For purposes of CEQA, responsible agencies include all public agencies other than the lead agency that have discretionary approval authority over the project.

Although not Responsible Agencies under CEQA, several other agencies have review authority over aspects of the General Plan or approval authority over projects that could potentially be implemented in accordance with various General Plan objectives and policies. These agencies and their roles are listed below.

- The California Department of Transportation (Caltrans) has responsibility for approving future improvements to the state highway system, including Highway 1 and State Route 227.
- The Airport Land Use Commission (ALUC) has the responsibility of reviewing land use consistency between the Airport Land Use Plan and the City’s governing documents and proposed development within the ALUP area.
- The Local Agency Formation Commission (LAFCO) of the County of San Luis Obispo has responsibility for approving any annexations to the City that might occur over the life of the General Plan.
- California Department of Fish and Wildlife (CDFW) has responsibility for issuing take permits and streambed alteration agreements for any projects with the potential to affect plant or animal species listed by the State of California as rare, threatened, or endangered or that would disturb waters of the state.

Trustee agencies have jurisdiction over certain resources held in trust for the people of California but do not have a legal authority over approving or carrying out the project. CEQA Guidelines Section 15386 designates four agencies as Trustee Agencies: The California Department of Fish and Wildlife with regards to fish and wildlife, native plants designated as rare or endangered, game refuges, and ecological reserves; the State Lands Commission, with regard to state-owned “sovereign” lands, such as the beds of navigable waters and state school lands; the California Department of Parks and Recreation, with regard to units of the state park system; and, the University of California, with regard to sites within the Natural Land and Water Reserves System. The CDFW is the only trustee agency for the General Plan EIR.

1.6 Intended Uses of the EIR

This EIR is as an informational document for use in the City’s review and consideration of the LUCE Update, including corresponding changes to other General Plan Elements and zoning regulations that are required for internal and vertical consistency. It is to be used to facilitate creation of a General Plan that incorporates environmental considerations and planning principles into a cohesive policy document. The General Plan will guide subsequent actions taken by the City in its review of new development projects and its establishment of new and/or revised citywide programs.

This EIR discloses the possible environmental consequences associated with the General Plan Land Use and Circulation Elements Update. The information and analysis in this EIR will be used by the San Luis Obispo Planning Commission and City Council, responsible and trustee agencies, and the general public.
1.7 EIR Process

The environmental review process, as required under CEQA, is summarized below.

1. **Notice of Preparation (NOP).** After deciding that an EIR is required, the lead agency must file an NOP soliciting input on the EIR scope to the State Clearinghouse, other concerned agencies, and parties previously requesting notice in writing (CEQA Guidelines Section 15082; Public Resources Code Section 21092.2). The NOP must be posted in the County Clerk’s office for 30 days. For projects of regional significance, the lead agency holds a scoping meeting during the 30-day NOP review period.

2. **Draft EIR.** The Draft EIR must contain: a) table of contents or index; b) summary; c) project description; d) environmental setting; e) discussion of significant impacts (direct, indirect, cumulative, growth-inducing and unavoidable impacts); f) a discussion of alternatives; g) mitigation measures; and h) discussion of irreversible changes.

3. **Notice of Completion.** Upon completion of a Draft EIR, the lead agency must file a Notice of Completion with the State Clearinghouse and prepare a Public Notice of Availability of a Draft EIR. The lead agency must place the Notice in the County Clerk’s office for 30 days (Public Resources Code Section 21092) and send a copy of the Notice to anyone requesting it (CEQA Guidelines Section 15087). In addition, public notice of the availability of the Draft EIR must be given through at least one of the following procedures: a) publication in a newspaper of general circulation; b) posting on and off of the project site; or c) direct mailing to owners and occupants of contiguous properties and others who have requested such notification. The lead agency must solicit comments from the public and respond in writing to all written comments received (Public Resources Code Sections 21104 and 21253). The minimum public review period for a Draft EIR is 30 days. When a Draft EIR is sent to the State Clearinghouse for review, the public review period must be 45 days (Public Resources Code Section 21091).

4. **Final EIR.** Following the close of the Draft EIR review period, a Final EIR is prepared. The Final EIR must include: a) the Draft EIR; b) copies of comments received during public review; c) a list of persons and entities commenting; and d) responses to comments.

5. **Final EIR Certification.** Prior to making a decision on a proposed project, the lead agency must certify that: a) the Final EIR has been completed in compliance with CEQA; b) the Final EIR was presented to the decision-making body of the lead agency; and c) the decision-making body reviewed and considered the information in the Final EIR prior to approving the project (CEQA Guidelines Section 15090).

6. **Lead Agency Project Decision.** Upon certification of an EIR, the lead agency makes a decision on the project analyzed in the EIR. A lead agency may: a) disapprove a project because of its significant environmental effects; b) require changes to a project to reduce or avoid significant environmental effects; or c) approve a project despite its significant environmental effects, if the proper findings and statement of overriding considerations are adopted (CEQA Guidelines Sections 15042 and 15043).

7. **Findings/Statement of Overriding Considerations.** For each significant impact of the project identified in the EIR, the lead or responsible agency must find, based on substantial evidence, that either: a) the project has been changed to avoid or substantially reduce the magnitude of the impact; b) changes to the project are within another agency’s jurisdiction and such changes have or should be adopted; or c) specific economic, social, or other considerations make the mitigation measures or project alternatives infeasible (CEQA Guidelines Section 15091). If an agency approves a project with unavoidable significant environmental effects, it must prepare a written Statement of Overriding Considerations that sets forth the specific social, economic, or other reasons supporting the agency’s decision and explaining why the project’s benefits outweigh the significant environmental effects.

8. **Mitigation Monitoring/Reporting Program.** When an agency makes findings on significant effects identified in the EIR, it must adopt a reporting or monitoring program for mitigation measures that were adopted or made conditions of project approval to mitigate significant effects.
1.8 Organization of the Final EIR

This Final EIR comprises four chapters that meet the requirements of the State CEQA Guidelines, as outlined above. The four chapters that make up this Final EIR are as follows:

- **“Executive Summary”** provides a brief project description and presents a summary table of the Proposed Project’s environmental effects.

- **Chapter 1, “Introduction”** provides a brief overview of the Proposed Project, environmental compliance activities conducted to date, and outlines the contents and organization of the Final EIR.

- **Chapter 2, “Response to Comments on the Draft EIR”** provides a list of commenters and copies of written comments (coded for reference).

- **Chapter 3, “Minor Changes and Edits to the Draft EIR”** includes any corrections and/or additions to the Draft EIR text as a result of comments made on the Draft EIR. These changes to the draft EIR are indicated by revision marks (underline for **new text** and strikeout for **deleted text**).

- **Chapter 4, “Report Preparation”** provides a list of the individuals involved in the preparation of the final EIR.

In reference to Section 15132(a) of the State CEQA Guidelines, the Draft EIR for the Proposed Project has been incorporated by reference into this Final EIR. A copy of the Draft EIR is on file at the City of San Luis Obispo Community Development Department located at 919 Palm Street, San Luis Obispo, CA. A copy can also be viewed by visiting the LUCE Update web site at [www.slo2035.com](http://www.slo2035.com).
Please see the next page.
This chapter provides a list of all the written comments received during the public review period for the Draft EIR, including copies of the comments received and associated responses.

Individual responses to each of the comment letters identified in Chapter 2 “Response to Comments” are included in this chapter. Neither the comments on the Draft Environmental Impact Report (EIR) nor the City’s responses thereto raise any “significant new information” within the meaning of Public Resources Code Section 21092.1 or CEQA Guidelines Section 15088.5. Therefore, the City of San Luis Obispo, as the CEQA Lead Agency, has directed that a Final EIR be prepared. Comments that do not directly relate to the analysis in this document (i.e., that are outside the scope of this document) are not given specific responses. However, all comments are addressed in this chapter so that the City of San Luis Obispo Planning Commission and City Council are provided the input received through the public comment period.

In some cases, multiple comments were received with respect to several planning and/or environmental issues raised in the Draft EIR. In order to provide the commenter with a complete picture regarding his or her concern, the City prepared a master response for those comments common to a given subject. These master responses provide some background regarding the issue, identify how the issue was addressed in the Draft EIR, and provide additional explanation to address the commenters’ concerns. In some cases, these responses have also been prepared to address specific land use or planning concerns (i.e., requests for land use/zoning changes, etc.) related to the LUCE Update but unrelated to the EIR or environmental issues associated with the Project. Comments which present opinions about the project unrelated to environmental issues or which raise issues not directly related either to the substance of the EIR, the General Plan Update, or to environmental issues are noted without a detailed response.

2.1 Master Responses

The section begins with the master responses that have been prepared to address multiple comments related to a common subject. These master responses provide some background regarding the issue, identify how the issue was addressed in the Draft EIR, and provide additional explanation to address the commenters’ concerns.

Master Response #1: Comments Specific to the LUCE Update Concepts and/or Policies

During the public review period for the Draft EIR, several respondents provided a variety of comments requesting clarification of the planning concepts (i.e., policy revisions, etc.) provided in the City’s Updated Land Use and Circulation General Plan Elements. This master response has been developed to address comments related to the Land Use and Circulation Element (LUCE) update concepts and policies.

The primary objective of this Final EIR is to respond to comments received during the public review period that address concerns specific to environmental impacts of the LUCE Update or the adequacy or completeness of the Draft EIR analysis. Not surprisingly, given the broad nature and multiple functions of a General Plan, not all comments received in response to the draft EIR were environmental in character. CEQA does not require a formal response to such comments, even though they may well address legitimate concerns of public policy (e.g., community character, social, economic, or fiscal issues). Some comments express support or concerns associated with the LUCE Update or particular policies. Some comments criticize the Proposed Project from a policy standpoint, or characterize it in negative terms, but do not argue that the Draft EIR is in any way deficient. Still other comments offer suggested changes to proposed policy language. All such comments are part of the administrative record for the General Plan process, and all will be forwarded, as part of this Final EIR, to City decision-makers for their careful consideration. In weighing the various benefits and detriments
associated with the Preferred Alternative and the other alternatives, these decision-makers have to balance community character, social, economic, fiscal, and other concerns against the environmental impacts of the various options.

**Master Response #2: Programmatic Nature of the EIR**

Several commenters on the Draft EIR provided requests to have detailed impact analysis provided regarding specific developments that may occur through implementation of the proposed LUCE Update. This master response has been developed to address those comments. According to the CEQA Guidelines (Section 15168[a]), a local agency may prepare a program-level EIR to address a series of actions that can be characterized as one large project. For a General Plan update where policy and programs are related geographically, and related as logical parts of a chain of contemplated events, through rules, regulations, or plans that govern the conduct of a continuing program, a programmatic EIR is an appropriate tool to ensure potential environmental impacts are evaluated. Policies and implementation of the General Plan are carried out under the same authorizing statutory or regulatory authority and have generally similar environmental effects that can be mitigated in similar ways. This EIR was prepared as a Program EIR. As a Program EIR, this document serves as a first-tier document that assesses and documents the broad environmental impacts of a program with the understanding that a more detailed site-specific environmental review may be required to assess future projects implemented under the program. As individual projects with specific site plans and facilities are planned, the City will evaluate each project to determine the extent to which this EIR covers the potential impacts of the project and to what extent additional environmental analysis may be required for each specific future project. (see Public Resources Code, Sections 21083.3, 21093, 21094; CEQA Guidelines, Sections 15152, 15168, 15183.)

**Master Response #3: Jobs/Housing Balance.**

The issue of jobs/housing balance was raised in comments on the DEIR both directly and indirectly. The jobs/housing balance has been an important policy issue because of its implications for transportation systems. Academics and practitioners argue that achieving and maintaining a healthy balance between jobs in a community and the housing supply in a community yields benefits in terms of reduced driving and congestion, less air pollution, and lower costs to businesses and commuters. Defining and measuring a jobs/housing balance raises a series of challenges. For instance, should the jobs-housing balance be calculated for an incorporated area (defined by its city limits) or for a larger urbanized planning area? In San Luis Obispo’s case, the calculation for the larger area would include employment at Cal Poly and the California Men’s Colony. Added to a statistical jobs/housing balance are details related to whether there is a match between wage levels and housing costs; whether all workers in a house have employment in the community in which they live; whether preferences are met within the community for either housing or employment; and whether options are available nearby for either housing or employment. Even if an ideal jobs/housing balance is achieved, it still may mean the community has a large daily in-commute and out-commute.

According to the City of San Luis Obispo’s 2012 Annual Report on the General Plan, San Luis Obispo had a jobs-to-housing ratio of 1.6:1 within its city limits and a ratio of 1.8:1 if jobs at Cal Poly and the California Men’s Colony are included in the calculation. SLOCOG’s projections show a ratio of employment to housing units (within the San Luis Obispo city limits) of 1.5:1 in 2010, rising to 1.8:1 by 2035 (based on revised projections adopted by SLOCOG in April 2014).

The SLOCOG Regional Growth Forecast projects a demand for 4,271 people, 2,429 housing units, and 9,400 jobs between 2010 and 2035. Assuming 550 non-residential square feet per job, there is a demand for 5,170,000 square feet of non-residential floor area between 2010 and 2035. Potential future development in the Land Use Element Planning Subarea as envisioned by the proposed Land Use Element Update could result in approximately 4,904 additional dwelling units, 11,229 people, 11,346 jobs, and 5,081,708 non-residential square feet. Please refer to the table below, Table 2.4-5, from the Draft EIR.
Table 2.4-5  Comparison of SLOCOG Projections and Total Future Development Capacity, 2010-2035

<table>
<thead>
<tr>
<th></th>
<th>SLOCOG Regional Growth Forecast(^1)</th>
<th>Total Future Development Capacity(^2)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Population(^3)</td>
<td>4,271</td>
<td>11,229</td>
</tr>
<tr>
<td>Housing Units</td>
<td>2,429</td>
<td>4,904</td>
</tr>
<tr>
<td>Employment</td>
<td>9,400</td>
<td>11,346</td>
</tr>
<tr>
<td>Non-Residential Square Footage(^4)</td>
<td>5,170,000</td>
<td>5,081,708</td>
</tr>
</tbody>
</table>

\(^1\) See Table 2.3-4.
\(^2\) See Table 2.4-3
\(^3\) SLOCOG forecast population is based on 1.75 persons/household. Future development population is based on 2010 Census 2.2 persons/household
\(^4\) Estimated using 550 non-residential square feet per job

Source: SLOCOG, SLO County 2040 Population, Housing, and Employment Forecast (2011)

The jobs-housing balance analysis is appropriately based on projected demand, not planned capacity since this often exceeds what will likely be absorbed in the 20-year timeframe of the plan.

2.2 Summary of Comment Letters

The public agencies, organizations, and individuals that submitted comments on the Draft EIR are listed below in Table 2-1. As shown in the table, each comment letter has been designated by a specific letter and number that will be used to refer to particular comments and responses.

Each of the comment letters identified in Table 2-1 are provided on the following pages, with individual responses to each of the comment letters provided immediately following each letter. The content of each letter has been divided into individual segments that appear to address a distinct subject. To assist in referencing these comments, each comment letter has been assigned a letter and number combination (i.e. A1, A2, etc.) and each segment within the letter a corresponding number (i.e. A1-1, A1-2, etc.). Letters received from public agencies have been organized and identified by the letter “A”, followed by a number. For example, the first agency letter (California Public Utilities Commission) is identified as “A1”, the second agency letter (Cal Poly) as “A2”, and so forth. Letters from individuals and organizations have been assigned the letter “P”. This category follows the same numbering assignment as described previously (P1, P2, P3, etc.). Comments resulting from Public Hearings at the City’s Advisory Bodies have been assigned the letters “PH”, following the same numbering assignment as described above. The responses provided in this Final EIR are organized in a similar fashion.

Where changes to the Draft EIR text result from these responses to comments, those changes are presented in Chapter 3 “Minor Edits to Draft Program EIR” of this document, with changes shown by underlining new text (e.g., new text) and striking out text to be deleted (e.g., deleted text). Reponses that resulted in proposed changes to the Draft EIR text or another document in the LUCE Update are marked with a blue square (■) following the comment number.

After careful consideration of all the letters received on the Draft EIR and the responses to the comments in the letters, City staff has concluded that none of the information received or generated since the publication of the Draft EIR constitutes “significant new information” within the meaning of Public Resources Code Section 21092.1 and CEQA Guidelines Section 15088.5. For this reason, the City need not “recirculate” for additional public comment either a full or a partial revision to the Draft EIR and the preparation of a Final EIR is appropriate.
<table>
<thead>
<tr>
<th>Letter #</th>
<th>Date Received</th>
<th>Commenter</th>
<th>Starting on Page…</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Agency Letters</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>A2</td>
<td>7/8/2014</td>
<td>Cal Poly</td>
<td>2-12</td>
</tr>
<tr>
<td>A3</td>
<td>6/17/2014</td>
<td>Native American Heritage Commission</td>
<td>2-15</td>
</tr>
<tr>
<td>A4</td>
<td>7/27/2014</td>
<td>SLO County APCD</td>
<td>2-20</td>
</tr>
<tr>
<td>A5</td>
<td>7/23/2014</td>
<td>Caltrans Aeronautics</td>
<td>2-24</td>
</tr>
<tr>
<td>A6</td>
<td>7/28/2014</td>
<td>SLOCOG</td>
<td>2-32</td>
</tr>
<tr>
<td>A7</td>
<td>7/28/2014</td>
<td>Caltrans District 5</td>
<td>2-48</td>
</tr>
<tr>
<td>A8</td>
<td>7/30/2014</td>
<td>ALUC</td>
<td>2-63</td>
</tr>
<tr>
<td><strong>Public Letters</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>P1</td>
<td>7/27/2014</td>
<td>Kimberley Wormley</td>
<td>2-84</td>
</tr>
<tr>
<td>P2</td>
<td>7/27/2014</td>
<td>Sierra Club</td>
<td>2-90</td>
</tr>
<tr>
<td>P3</td>
<td>7/28/2014</td>
<td>Eugene Jud</td>
<td>2-121</td>
</tr>
<tr>
<td>P4</td>
<td>7/15/2014</td>
<td>HealSLO</td>
<td>2-132</td>
</tr>
<tr>
<td>P5</td>
<td>6/14/2014</td>
<td>Donna Di Gangi</td>
<td>2-134</td>
</tr>
<tr>
<td>P6</td>
<td>7/27/2014</td>
<td>Sarah Flickinger</td>
<td>2-138</td>
</tr>
<tr>
<td>P7</td>
<td>7/22/2014</td>
<td>Louise Justice</td>
<td>2-140</td>
</tr>
<tr>
<td>P8</td>
<td>7/26/2014</td>
<td>Kenneth Schwartz</td>
<td>2-143</td>
</tr>
<tr>
<td>P9</td>
<td>7/28/2014</td>
<td>Linda Seeley</td>
<td>2-146</td>
</tr>
<tr>
<td>P10</td>
<td>7/28/2014</td>
<td>Stephen Peck</td>
<td>2-148</td>
</tr>
<tr>
<td>P11</td>
<td>7/28/2014</td>
<td>Debbie Farwell</td>
<td>2-197</td>
</tr>
<tr>
<td>P12</td>
<td>7/28/2014</td>
<td>Rachel Kovesdi</td>
<td>2-205</td>
</tr>
<tr>
<td>P13</td>
<td>7/28/2014</td>
<td>James Lopes</td>
<td>2-212</td>
</tr>
<tr>
<td>P14</td>
<td>7/28/2014</td>
<td>Pete Schwartz</td>
<td>2-227</td>
</tr>
<tr>
<td>P15</td>
<td>7/25/2014</td>
<td>Santa Maria Valley Railroad Co.</td>
<td>2-229</td>
</tr>
<tr>
<td>P16</td>
<td>7/28/2014</td>
<td>Mila Vujovich-La Barre</td>
<td>2-238</td>
</tr>
<tr>
<td>P17</td>
<td>7/21/2014</td>
<td>Sierra Club</td>
<td>2-268</td>
</tr>
<tr>
<td><strong>Public Hearing Letters</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>PH1</td>
<td>7/1/2014</td>
<td>Special Joint Meeting of the City Council and Planning Commission</td>
<td>2-271</td>
</tr>
<tr>
<td>PH2</td>
<td>7/20/2014</td>
<td>Architectural Review Commission</td>
<td>2-274</td>
</tr>
<tr>
<td>PH3</td>
<td>7/17/2014</td>
<td>Bicycle Advisory Committee</td>
<td>2-278</td>
</tr>
<tr>
<td>PH4</td>
<td>7/27/2014</td>
<td>Cultural Heritage Committee</td>
<td>2-282</td>
</tr>
<tr>
<td>PH5</td>
<td>7/22/2014</td>
<td>Parks and Recreation Commission</td>
<td>2-288</td>
</tr>
<tr>
<td>PH6</td>
<td>7/9/2014</td>
<td>Mass Transit Committee</td>
<td>2-295</td>
</tr>
</tbody>
</table>
June 23, 2014

Kim Murry  
kmurray@slocity.org  
City of San Luis Obispo  
919 Palm Street  
San Luis Obispo, California 93401

Dear Kim:

SUBJECT: SCH 2013121019 San Luis Obispo General Plan Update - DEIR

The California Public Utilities Commission (Commission) has jurisdiction over the safety of highway-rail crossings (crossings) in California. The California Public Utilities Code requires Commission approval for the construction or alteration of crossings and grants the Commission exclusive power on the design, alteration, and closure of crossings in California. The Commission Rail Crossings Engineering Section (RCES) is in receipt of the draft Environmental Impact Report (DEIR) for the proposed City of San Luis Obispo (City) General Plan Update project.

The project area includes the active rail tracks and stations. RCES recommends that the City add language to the General Plan Update so that any future development adjacent to or near the planned railroad right-of-way (ROW) is planned with the safety of the rail corridor in mind. New developments may increase traffic volumes not only on streets and at intersections, but also at any planned at-grade crossings. This includes considering pedestrian circulation patterns or destinations with respect to railroad ROW and compliance with the Americans with Disabilities Act. Mitigation measures to consider include, but are not limited to, the planning for grade separations for major thoroughfares, improvements to existing at-grade crossings due to increase in traffic volumes, and continuous vandal resistant fencing or other appropriate barriers to limit the access of trespassers onto the railroad ROW.

Foothill and California Boulevards are two (2) of the most heavily traveled roadways in the City. Their intersection is approximately 40 feet east of the Foothill Boulevard at-grade crossing (CPUC Number. 001E-247.15/SLO-1022 and DOT Number 745352P). California Boulevard is 40 feet east of and parallel to the Union Pacific Railroad (UPRR) Company tracks. A bike path is along the west side of California Boulevard.

Foothill Boulevard Crossing

1. Flash Light Signals

The Foothill Boulevard crossing does not follow the guideline of having the flashing light signals visible from each travel lane, as specified by the 2014 Manual for Railway Engineering (MRE) of the American Railway Engineering and Maintenance-of-Way
Association (AREMA). The crossing is a 5-lane crossing currently with two (2) Commission Standard 9 (flashing light signal assemblies with automatic gates) automatic warning devices. Motorists traveling on the inside lanes would have their visibility of the flashing lights obstructed if large vehicles are located in the outside lanes. RCES recommends installation of either an additional median mounted Commission Standard 9’s or a Commission Standard 9-A (Commission Standard 9 with additional flashing light signals over the roadway on a cantilevered arm) automatic warning devices on each traffic direction in order to ensure motorists in all travel lanes have proper visibility of the flashing light signals.

2. Sidewalks

There is very high pedestrian use at the crossing. While the crossing has two (2) sidewalks, RCES staff noted the sidewalk in the northwest quadrant of the crossing was in very rough condition during an inspection on June 19, 2013 (see the photograph below). The City’s recent installation of a bicycle path along California Boulevard included refurbishment of the sidewalks in the northeast and southeast quadrants of the crossing, while ignoring the northwest and southwest quadrants. The rail crossing does not currently have detectable warning on any sidewalk approach. RCES recommends the crossing be brought into Americans with Disabilities Act (ADA) compliance with the installation of detectable warning on each sidewalk approach and refurbishment of the sidewalk approaches in the northwest and southwest quadrants.

Rough Sidewalk Northwest Quadrant:

3. Preemption

On November 1, 2012, UPRR conducted a railroad preemption review with the City and RCES staff at the Foothill Boulevard crossing. Their analysis determined the clearance
green time should be increased from the existing 10 seconds to 21 seconds in order to clear the design vehicle from the crossing. The City chose to wait on the distribution of the report before making the adjustments to the signal timing. In its current configuration, the City has chosen to clear pedestrians at the risk of increasing vehicle queues on the tracks, potentially leading to train incidents. If the recommended change to the track clearance green time has not yet been implemented, RCES staff recommends the change be made immediately.

4. Crossing Modifications

The City’s recent addition of the bicycle lane along California Boulevard impacted the Foothill Boulevard crossing in that the sidewalks in the northeast and southeast quadrants were modified. A pedestrian crosswalk was also installed parallel to the tracks at the Foothill Blvd/California Blvd intersection. These modifications directly impact the crossing and are considered alteration of the crossing, which falls under the requirements of the Commission’s General Order (GO) 88-B (http://www.cpuc.ca.gov/PUC/safety/Rail/Crossings/go88b.htm). Commission authorization is required for these modifications. RCES staff notified City staff that a GO 88-B would be required during a diagnostic meeting on December 16, 2010, prior to opening of the bicycle path. The GO 88-B would need to include ALL of the previously discussed recommendations. The City completed and opened the bicycle path, installing the modifications at the rail crossing without Commission authorization, resulting in a railroad crossing noncompliant with both AREMA and ADA guidelines.

Bike Path Along California Boulevard

RCES staff inspected the tracks between the Amtrak station and Orcutt Rd in 2012 and found the fencing between the railroad tracks and the bicycle path to be inadequate. The existing fence consists of a wire fence which is easily cut open by trespassers over the railroad tracks. RCES staff has noted several trespassing spots, including those at Roundhouse Street (http://goo.gl/maps/GyB5b) and Francis Street (http://goo.gl/maps/ZroVx) as noted in the following three (3) photographs. RCES staff recommends installing vandal resistant fencing, such as the wrought iron fencing used along the railroad right of way adjacent to the California Polytechnic State University, along the entirety of the bike path.
1. Roundhouse Street Pathway:

2. Roundhouse Street Fence Cutout:
3. Francis Street Fence Cutout with pathway:

If you have any questions in this matter, please contact me at (415) 703-3722 or felix.ko@cpuc.ca.gov.

Sincerely,

Felix Ko, P.E.
Utilities Engineer
Rail Crossings Engineering Section
Safety and Enforcement Division

C: State Clearinghouse
2.3 Comment Letters and Associated Responses

Letter A1  State of California Public Utilities Commission

Response to Comment A1-1
The City concurs with this comment that future development projects adjacent to or near a railroad right-of-way must consider the potential for significant rail corridor safety impacts. Future development projects that require a discretionary approval and that would have the potential to substantially increase vehicle, pedestrian or bicycle traffic adjacent to or near a railroad right-of-way would be subject to project-specific environmental review consistent with the requirements of CEQA and City Policy 12.3.11, Environmental Review. If it is determined that the proposed project would have the potential to result in a significant railroad-related safety impact, mitigation measures to minimize the identified safety impact to the extent feasible would be implemented. The mitigation measures identified by the project-specific environmental review may include measures similar to those identified by this comment. See also Master Response #2, Programmatic Nature of the EIR.

Response to Comment A1-2
The commenter states that installation of additional automatic warning devices at the Foothill Boulevard railroad crossing could provide greater visibility of flashing light signals for drivers. This comment regarding suggested infrastructure changes pertains exclusively to the merits of existing infrastructure and does not pertain to the adequacy of the analysis in the DEIR. The letter dated August 7, 2014 from the City to the California Public Utilities Commission was responsive to this comment.

Response to Comment A1-3
The commenter states that pedestrian facilities near the Foothill Boulevard railroad crossing could be modified comply with ADA standards. This comment regarding suggested infrastructure changes pertains exclusively to the merits of existing infrastructure and does not pertain to the adequacy of the analysis in the DEIR. The letter dated August 7, 2014 from the City to the California Public Utilities Commission was responsive to this comment.

Response to Comment A1-4
The commenter states that pedestrian facilities near the Foothill Boulevard railroad crossing could be modified comply with ADA standards. This comment regarding suggested infrastructure changes pertains exclusively to the merits of existing infrastructure and does not pertain to the adequacy of the analysis in the DEIR. The letter dated August 7, 2014 from the City to the California Public Utilities Commission was responsive to this comment.

Response to Comment A1-5
The commenter states that Union Pacific Railroad conducted a railroad preemption review at the Foothill Boulevard crossing that concluded the clearance green time should be increased from the existing 10 seconds to 21 seconds in order to clear the design vehicle from the crossing. This comment regarding preemption pertains exclusively to the merits of existing railroad crossing facilities and does not pertain to the adequacy of the analysis in the DEIR. The letter dated August 7, 2014 from the City to the California Public Utilities Commission was responsive to this comment.
Response to Comment A1-6

The commenter states that fencing along the railroad tracks could have gaps along certain portions of the fence and requests that the City address rail-infrastructure coordination with the appropriate utilities. Although this comment pertains to the merits of the existing infrastructure and does not pertain to the adequacy of the analysis in the DEIR, language found under item C below is recommended for addition to proposed Program 12.1.3 to help clarify this discussion. As this program contains proposed edits shown in strikeout/underline format that exist in the public draft, changes added to this program are highlighted in yellow.

Policy 12.1.3 Idling Train Engines Coordination with Organizations Regarding Safety and Environmental Sensitivity

The City shall coordinate railroad facility infrastructure maintenance with the Union Pacific Railroad and the Public Utilities Commission and shall work with the Air Pollution Control District and others to eliminate idling train engines in San Luis Obispo.
July 9, 2014

Kim Murry, Deputy Director  
Community Development Department  
City of San Luis Obispo  
919 Palm Street  
San Luis Obispo, California 93401

City of San Luis Obispo General Plan Land Use and Circulation Element Update – Draft EIR Public Review

We appreciate the opportunity to participate in the public review of the Draft Environmental Impact Report (EIR) for the General Plan Land Use and Circulation Element (LUCE) Update. In our continued efforts to increase Town/Gown relations, the City’s General Plan and the University’s Master Planning efforts should work together while planning for the future of San Luis Obispo and Cal Poly.

The following comments/questions are in regard to the Draft EIR and proposed policies in the Updated LUCE:

Proposed Annexations
On page 2-16 of the Draft EIR, proposed Land Use Element policy 1.12.3 (Annexation of Cal Poly) states that “the City should analyze the suitability of annexing Cal Poly. Annexing Cal Poly would not affect existing environmental conditions associated with the campus, and would not result in an enrollment increase or additional on-campus development, nor would it apply City General Plan policies and programs to the state-owned lands. Therefore, the potential annexation of the campus would not result in significant new land use conflicts between existing and proposed land uses because it would represent solely a change in corporate boundary.”

Both the EIR and the LUCE do not speak to the benefit of annexing the campus. Does this policy further the goals of the LUCE or the objectives of the program analyzed in the EIR? Please identify potential advantages and rationale of annexation.

Other Special Planning Areas
On Page 2-26, the Cal Fire/Cal Poly-Owned Property on Highway 1 is identified as a Special Planning Area with a note that “No potential land uses in this area have been identified.” Cal Poly staff submitted an email to the City on December 9, 2013, in response to the City’s request for input on the land use designation of this property and others, requesting that the Cal Fire site be designated as Public, similar to the remainder of the campus. In the current 2001 Campus Master Plan, this site is identified as a future site for faculty and staff housing.

Please revise the EIR and Special Planning Area language to acknowledge the current Campus Master Plan designation of Faculty and Staff Housing.
Traffic Reduction
The Traffic Reduction Chapter of the Circulation Element provides direction regarding the City’s desire to manage traffic congestion by encouraging modes of transportation other than the single occupant vehicle and also to work with major employers to provide commuter options to reduce vehicle trips. Cal Poly’s Master Plan also includes principles and programs to encourage use of alternative modes of transportation and reducing single occupant vehicles on campus. The new traffic reduction program proposed (2.1.4), and identified on page 2-33 of the EIR indicates that “the City will work with Cal Poly, Cuesta College, and other educational institutions to provide incentives to all students, faculty, and staff to use alternative forms of transportation.”

Cal Poly currently pays an annual fee for its students, faculty and staff to ride the bus at no charge to the rider. Additionally, incentives are offered to faculty and staff to carpool, participate in the vanpool program, or ride a bicycle to campus. The proposed LUCE policy and supporting text in this section does not identify efforts already made for incentive programs and implies that the City is proposing incentives where none exist. Additionally, on page 4-163, Climate Action Plan Strategy/Action TLU 1.4 states “continue to offer a free or discounted bus passes to residents who work in the downtown core, seniors and students” without identifying existing efforts and incentives. Not until page 4-352, in a separate section, Campus Service, does the EIR text acknowledge the “free fare subsidy program” for campus affiliates.

Please identify incentives already implemented throughout the document to thoroughly analyze the potential benefit of the proposed program.

Historical Resources
On page 4-102, the EIR states, in error, that Cal Poly was established in 1903. Cal Poly was established in 1901 by the state legislature and had its first class in 1903 of 22 students.

Water and Waste Water Treatment
On pages 4-357 to 4-359, it should be noted that Cal Poly contributed to the expansion of both the water and waste water treatment facilities.

Thank you again for including Cal Poly in the LUCE Update and public review of the Draft EIR. If you have any questions regarding Cal Poly’s comments on the Draft EIR, and for future participation, please contact Julie Moloney, Campus Planner, at (805) 756-6563, or jmoloney@calpoly.edu.

CALIFORNIA POLYTECHNIC STATE UNIVERSITY

Joel Neel
Director of Facilities Planning & Capital Projects
Response to Comment A2-1
The Commenter requests identification of potential advantages and rationale of annexation of Cal Poly into the City of San Luis Obispo. The LUCE Update does not propose immediate annexation of Cal Poly. Policy 1.12.3 states, “The City should analyze the cost/benefits of annexing Cal Poly”.

Response to Comment A2-2 ■
The Commenter references a previous request from December 9, 2013 to designate the CalFire/Cal Poly site on Highway 1 as Public Facilities and further requests the EIR and Special Planning Area language in the Land Use Element acknowledge the Cal Poly Campus Master Plan designation of Faculty and Staff Housing for this site. The request referenced by Cal Poly indicated a preference for removal of this site and the Bella Montana site from the Land Use Map entirely with a second preference of designation as “Public”. The LUCE update has reflected the public ownership of this site with a designation of Public Facilities and the Land Use Element acknowledges that Cal Poly includes this property in their Master Plan. The current land use designation as public reflects Cal Poly’s request for this designation. Policy language in the Land Use Element reflects direction for future collaboration with the City as Cal Poly updates the Master Plan to address sensitive visual and habitat resources, circulation issues, impacts to City services, transition and potential impacts to surrounding neighborhoods for this site.

Reference to the Cal Poly Campus Master Plan on page 2-26 (top of page) will be edited in the FEIR as follows.

- Cal Fire/Cal Poly-Owned Property on Highway 1. No potential land uses in this area have been identified. This site is included as part of the Cal Poly Campus Master Plan.

Response to Comment A2-3 ■
The Circulation Element policy implementation program identified by this comment (Program 2.1.4, Incentives for Education Institutions) is one of four existing and proposed programs included in the Circulation Element Update that may be used to implement Circulation Element policies intended to reduce traffic volumes in the city. It is not the intent of Program 2.1.4 to identify existing traffic reduction measures that have been implemented by Cal Poly. However, the LUCE Update does recognize efforts made by Cal Poly to reduce traffic generation. For example, within the LUCE Update, Circulation Element Program 3.0.4 Campus Service states:

The City should continue to work with Cal Poly to maintain and expand the “no-fare subsidy program” for campus service and Cal Poly should continue to provide financial support to affiliates. The City should work with Cuesta College and other agencies to establish similar programs.

Response to Comment A2-4 ■
Thank you for the corrected information. EIR page 4-102 has been amended as follows:

This period, from 1900-1945, is said to commence exponential rates of population growth for the area. By 1901, the City was served by the Pacific Coast Railway and mainline Southern Pacific (Krieger 1988), and in 1903-1901 the California Polytechnic State University was established. The State Highway became drivable by 1915, leading to major booms in commercialization and urbanization of the area. The Motel Inn of San Luis Obispo was built in 1925, becoming the first motel to ever be built in the world.

Response to Comment A2-5
Thank you for the additional information regarding Cal Poly’s contribution to the expansion of the City’s water and wastewater treatment facilities. Although this comment provides some context for the facility upgrades, the information provided by this comment does not pertain to the adequacy of the environmental impact analysis provided in the Draft EIR. The comment has been noted and will be provided to the Planning Commission and City Council for consideration in the decision making process.
June 18, 2014

Kim Murry
City San Luis Obispo
010 Palm Street
San Luis Obispo, CA 93401

RE: SCH# 2013121019 City of San Luis Obispo General Plan Land Use and Circulation Elements Update, San Luis Obispo County.

Dear Ms. Murry:

The Native American Heritage Commission (NAHC) has reviewed the Notice of Completion (NOC) referenced above. The California Environmental Quality Act (CEQA) states that any project that causes a substantial adverse change in the significance of an historical resource, which includes archeological resources, is a significant effect requiring the preparation of an EIR (CEQA Guidelines §15064(b)). To comply with this provision the lead agency is required to assess whether the project will have an adverse impact on historical resources within the area of project effect (APE), and if so to mitigate that effect. To adequately assess and mitigate project-related impacts to archaeological resources, the NAHC recommends the following actions:

✓ Contact the appropriate regional archaeological information Center for a record search. The record search will determine:
  - If a part or all of the area of project effect (APE) has been previously surveyed for cultural resources.
  - If any known cultural resources have already been recorded on or adjacent to the APE.
  - If the probability is low, moderate, or high that cultural resources are located in the APE.
  - If a survey is required to determine whether previously unrecorded cultural resources are present.

✓ If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
  - The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure.
  - The final written report should be submitted within 3 months after work has been completed to the appropriate regional archaeological information Center.

✓ Contact the Native American Heritage Commission for:
  - A Sacred Lands File Check. USGS 7.5-minute quadrangle name, township, range, and section required
  - A list of appropriate Native American contacts for consultation concerning the project site and to assist in the mitigation measures. Native American Contacts List attached

✓ Lack of surface evidence of archeological resources does not preclude their subsurface existence.
  - Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, per California Environmental Quality Act (CEQA) Guidelines §15064.5(f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities.
  - Lead agencies should include in their mitigation plan provisions for the disposition of recovered cultural items that are not burial associated, which are addressed in Public Resources Code (PRC) §5097.98, in consultation with culturally affiliated Native Americans.
  - Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, PRC §5097.98, and CEQA Guidelines §15064.5(e), address the process to be followed in the event of an accidental discovery of any human remains and associated grave goods in a location other than a dedicated cemetery.

Sincerely,

Katy Sanchez
Associate Government Program Analyst

CC: State Clearinghouse
Native American Contact List
San Luis Obispo County
June 18, 2014

Beverly Salazar Folkes
1931 Shadybrook Drive
Thousand Oaks, CA 91362
folkes9@msn.com
(805) 492-7255
(805) 558-1154 Cell

Chumash
Tataviam
Fernandeño

Peggy Odom
1339 24th Street
Oceano, CA 93445
(805) 489-5390

Chumash

Santa Ynez Band of Mission Indians
Vincent Armenta, Chairperson
P.O. Box 517
Santa Ynez, CA 93460
varmenta@santaynezchumash.com
(805) 688-7997
(805) 686-9578 Fax

Chumash

Salinan Tribe of Monterey, San Luis Obispo Counties
Patty Dunton, Tribal Administrator
7070 Morro Road, Suite A
Atascadero, CA 93422
salinantribe@aol.com
(805) 460-9202
(805) 235-2730 Cell
(805) 460-9204

Santa Ynez Tribal Elders Council
Adelina Alva-Padilla, Chair Woman
P.O. Box 365
Santa Ynez, CA 93460
elders@santaynezchumash.org
(805) 688-8446
(805) 693-1768 FAX

Barbareno/Ventureno Band of Mission Indians
Julie Lynn Tumamait-Stennsle, Chair
365 North Poli Ave
Ojai, CA 93023
tumamait@hotmail.com
(805) 646-6214

Chumash

Lei Lynn Odom
1339 24th Street
Oceano, CA 93445
(805) 489-5390

Chumash

Randy Guzman - Folkes
4676 Walnut Avenue
Simi Valley, CA 93063
ndnRandy@yahoo.com
(805) 905-1675 Cell
(805) 520-5915 Fax

Chumash
Fernandeño
Tataviam
Shoshone Paiute
Yaqui

San Luis Obispo County Chumash Council
Chief Mark Steven Vigil
1030 Ritchie Road
Grover Beach, CA 93433
(805) 481-2461
(805) 474-4729 Fax

Chumash

Coastal Band of the Chumash Nation
Michael Cordero, Chairperson
P.O. Box 4464
Santa Barbara, CA 93140
CbonTRIBALCHAIR@gmail.com
(805) 689-9528

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5997.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH # 2013121419 City of San Luis Obispo General Plan Land Use and Circulation Elements Update, San Luis Obispo County.
Native American Contact List
San Luis Obispo County
June 18, 2014

yak tityu tityu - Northern Chumash Tribe
Mona Olivas Tucker, Chairwoman
660 Camino Del Rey
Arroyo Grande, CA 93420
olivas.mona@gmail.com
(805) 489-1052 Home
(805) 748-2121 Cell

Frank Arredondo
P.O. Box 161
Santa Barbara, CA 93102
ksen SKU mu@yahoo.com

Matthew Darian Goldman
495 Mentone
Grover Beach, CA 93433
805-748-6913

Santa Ynez Tribal Elders Council
Freddie Romero, Cultural Preservation ConsInt
P.O. Box 365
Santa Ynez, CA 93460
freddyromero1959@yahoo.com
(805) 688-7997, Ext 37

Santa Ynez Band of Mission Indians
Tribal Admin/Counsel Sam Cohen
P.O. Box 517
Santa Ynez, CA 93460
info@santaynezchumash.org
(805) 688-7997
(805) 686-9578 Fax

Barbareno/Ventureno Band of Mission Indians
Kathleen Pappo
2762 Vista Mesa Drive
Rancho Pales Verde, CA 90275
(310) 831-5295

Salinan-Chumash Nation
Xielolixii
3901 Q Street, Suite 31B
Bakersfield, CA 93301
(408) 966-8807 Cell

Barbareno/Ventureno Band of Mission Indians
Raulito Joe Banuelos, Jr.
331 Mira Flores Court
Camarillo, CA 93012
(805) 987-5314

Northern Chumash Tribal Council
Fred Collins, Spokesperson
67 South Street
San Luis Obispo, CA 93401
fcollins@northernchumash.org
(805) 801-0347 (Cell)

Coastal Band of the Chumash Nation
Janet Darlene Garcia
P.O. Box 4464
Santa Barbara, CA 93140
(805) 689-9528

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5997.9 of the Public Resources Code and Section 6097.98 of the Public Resources Code.
This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH # 20131219 City of San Luis Obispo General Plan Land Use and Circulation Elements Update, San Luis Obispo County.
Native American Contact List
San Luis Obispo County
June 18, 2014

Coastal Band of the Chumash Nation
Crystal Baker
P.O. Box 723
Atascadero, CA 93423
(805) 466-8406

PeuYoKo Perez
11465 Nardo Street
Ventura, CA 93004
grndowl4U@yahoo.com
(805) 231-0229 Cell

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7059.5 of the Health and Safety Code, Section 597.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH # 2013121419 City of San Luis Obispo General Plan Land Use and Circulation Elements Update, San Luis Obispo County.
Response to Comment A3-1
The City concurs that appropriate actions must be implemented to avoid or minimize the potential for adverse impacts to historical resources. The existing and proposed Land Use Element includes policies that require the implementation of cultural resource protection measures that are similar to the measures described in this comment letter. For example, Conservation and Open Space Element Policy 3.5.4, Archaeologically Sensitive Areas, requires a preliminary site survey be conducted by a qualified archaeologist when proposed development would be located in a sensitive area. The following policies also address the comments provided: Conservation and Open Space Element Policies, 3.5.1 Archaeological Resource Protection; 3.5.5, Archaeological Resources Present; 3.5.6, Qualified Archaeologist Present; 3.5.7, Native American Participation; and 3.5.8, Protection of Native American Cultural Sites. Each policy outlines specific requirements related to the protection and treatment of previously detected and unknown resources that may be encountered by future development activities. These policies are supported by City Archaeological Resource Preservation Program Guidelines which define timing and required components of archaeological investigations; priority for avoidance, mitigation and data recovery; and tribal consultation. The implementation of the Conservation and Open Space Element cultural resource protection policies would reduce the potential for significant impact to archaeological resources to a less than significant level. The LUCE update has met all SB 18 referral procedures and hearing notices have been provided to Native American contacts. See also Master Response #2, Programmatic Nature of the EIR.
July 28, 2014

Kim Murry, Deputy Director
Community Development Department
City of San Luis Obispo
919 Palm Street
San Luis Obispo, CA 93401

SUBJECT: APCD Comments Regarding the City of San Luis Obispo Land Use and Circulation Element Draft Environmental Impact Report (DEIR)

Dear Ms. Murry,

Thank you for including the San Luis Obispo County Air Pollution Control District (APCD) in the environmental review process. We have completed our review of the proposed DEIR for the update to the City of San Luis Obispo’s Land Use and Circulation Element and have the following comments.

Page ES-9 and 4-58 – Impact AQ 2 (long term)
Under the discussion on air toxics the EIR discusses setback distances from certain toxic air contaminant (TAC) sources and states:

"With regards to the exposure of sensitive receptors to TAC sources, ARB has recommended setback distances for local jurisdictions to consider in their planning processes. ARB research substantiates the health risks to sensitive receptors from exposure to high levels of TACs. ARB recommends local jurisdictions adopt land use policies to separate sensitive land uses a minimum of 500 to 1,000 feet from air toxic sources (ARB 2005)...."

"Within the city, there are no freeways or urban roadway segments with traffic volumes that exceed 100,000 vehicles per day and no rural roadways with volumes that exceed 50,000 vehicles per day based on the traffic analysis prepared for the LUCE Update and data from the California Department of Transportation (Caltrans) (Caltrans 2012), which are the specifications that trigger ARB’s advisory recommended setback distance. The other types of TAC sources in the City (existing or proposed under implementation of the LUCE Update) would be required by law to comply with APCD’s permit process, which would ensure exposure to sensitive receptors to TACS to be within acceptable levels.

The EIR then goes on to conclude

“Implementation of the LUCE Update would not result in the exposure of sensitive receptors to substantial sources of local carbon monoxide concentrations, odors, or TACs.”
The ARB's Land Use Guidance Document entitled "Air Quality and Land Use Handbook: A Community Health Perspective" recommends new sensitive land uses not be sited within 500 feet of a freeway, or an urban road with 100,000 vehicles per day, or a rural road with 50,000 vehicles per day.

APCD staff agrees with the siting/setback recommendations in the ARB Guidance Document; however, the narrative in the EIR seems to fall short of capturing all possible scenarios that might require a health risk assessment.

As outlined on page 3-14 of the APCD CEQA Handbook, there are basically two cases where a health risk assessment maybe required.

First a screening-level and/or refined health risk assessment (HRA) may be required for new proposed land use projects that generate toxic air contaminants (such as gasoline stations, distribution facilities, or asphalt batch plants) that impact sensitive receptors. As correctly pointed out in the section of the EIR in most cases these types of sources would require an APCD Permit. These sources are referred to as Type A sources in the APCD CEQA Air Quality Handbook and would require HRAs during the CEQA review process.

The second type of project referred to as Type B exists when a new land use project will place sensitive receptors (e.g., residential units) in close proximity to existing toxics sources (e.g., freeway, distribution centers, rail yards, refineries). These projects are referred to as Type B in the APCD CEAQ Air Quality Handbook. In this case the project proponent must evaluate all possible sources of TACs that are within 1,000 feet of the project property boundary, including roadways over 50,000 vehicles per day. Due to the rural nature of SLO County, the APCD considers any roadway that exceeds the 50,000 vehicles per day as a screening threshold for any Type B project that is proposed within 1,000 feet of these facilities. For the City of San Luis Obispo this includes the Highway 101 corridor that transverses through the city limits. These types of project would not be covered by an APCD permit and an HRA should be done during the CEQA review process.

For more information on air toxics and health risk assessment please refer to the APCD CEQA Air Quality Handbook Page 3.7 Section 3.6.1.

**APCD staff recommends the EIR section be updated to reflect the requirement for HRAs during the CEQA review process.**

**Page 4-59**
District staff does not agree with the finding that the long term air quality impacts would be Class I significant and unavoidable. The consistence analysis shows the LUCE Update would not be consistent with the Clean Air Plan. As individual projects are proposed the air quality impact should be evaluated on an individual bases and mitigation measures proposed to reduce air quality impact. If on-site measures are not adequate to reduce impact to below the APCD threshold then off-site mitigation would be necessary to bring the project below the APCD significance thresholds.

**City of San Luis Obispo General Plan Update Background Report - Page 6-31**
Table 6.3-2 on page 6-31 lists ARB's recommendation for siting new sensitive land use. Table 6.3-2 show the recommended setback distance listed for refineries is 1,000 feet. However, in ARB's Land Use Guidance Document entitled "Air Quality and Land Use Handbook a Community Health Perspective"
the recommendation for refineries is to “Avoid siting new sensitive land uses immediate downwind of petroleum refineries. Consult with local air districts and other local agencies to determine an appropriate separation.”

Again, thank you for the opportunity to comment on this proposal. If you have any questions or comments, feel free to contact me at (805) 781-4667.

Sincerely,

Melissa Guise
Air Quality Specialist

MAG/Img

H:\PLAN\CEQA\Project_Review\3\3800\3801-2\3801-2.doc
Response to Comment A4-1

The comment suggests that the Draft EIR section be updated to reflect the requirement for health risk assessments (HRAs) during the CEQA review process. The City concurs that future development projects that would locate sensitive receptors (e.g., residential units) in proximity to existing toxics sources (e.g., freeway, distribution centers, rail yards, refineries) may require the preparation of a HRA consistent with APCD regulations and guidelines. Such an assessment would be conducted as part of the project-specific environmental review required for future development consistent with the requirements of CEQA and City Policy 12.3.11 Environmental Review. Please also refer to Master Response #2, Programmatic Nature of the EIR.

Response to Comment A4-2

The comment states disagreement with the finding of Class I, significant and unavoidable, in regards to long-term air quality impacts. The analysis followed APCD guidance. Specifically, the most appropriate standard for assessing the significance of potential air quality impacts from a plan update is the preparation of a consistency analysis where the proposed project is evaluated against the land use goals, policies, and population projections contained in the current Clean Air Plan. The APCD’s CEQA Air Quality Handbook recommends evaluation of the following questions:

- Are the population projections used in the plan equal to or less than those used in the most recent Clean Air Plan for the same area;
- Is the rate of increase in vehicle trips and miles traveled less than or equal to the rate of population growth for the same area; and
- Have all applicable land use and transportation control measures from the most recent version of the Clean Air Plan been included in the plan to the maximum extent feasible?

The analysis found that implementation of the proposed LUCE Update would not be consistent with the assumptions contained in the most recent version of the APCD’s Clean Air Plan even with the incorporation of the proposed LUCE Update policies and existing City policies. Thus, it was concluded that long-term air quality impacts could conflict with applicable plan, violate or contribute substantially to an existing or projected air quality violation, contribute a cumulatively considerable net increase of criteria air pollutants for which the region is designated as non-attainment, and/or expose sensitive receptors to substantial pollutant concentrations.
July 18, 2014

Ms. Kim Murry
City of San Luis Obispo
919 Palm Street
San Luis Obispo, CA 93401

Dear Ms. Murry:

Re: Draft Environmental Impact Report for the City of San Luis Obispo General Plan Land Use and Circulation Elements Update; SCH Number: 2013121019

The California Department of Transportation (Caltrans), Division of Aeronautics (Division), reviewed the above-referenced document with respect to airport-related noise and safety impacts and regional aviation land use planning issues pursuant to the California Environmental Quality Act (CEQA). The Division has technical expertise in the areas of airport operations safety and airport land use compatibility. We are a funding agency for airport projects and we have permit authority for public-use and special-use airports and heliports. The following comments are offered for your consideration.

The proposed project is for an update to the City of San Luis Obispo (City) General Plan Land Use and Circulation Elements (LUCE).

In accordance with California Public Utilities Code (PUC) Section 21676 et seq., prior to the amendment of a general plan or specific plan, or the adoption or approval of a zoning ordinance or building regulation within the planning boundary established by the airport land use commission (ALUC), the local agency shall first refer the proposed action to the ALUC.

If the ALUC determines that the proposed action is inconsistent with the airport land use compatibility plan, the referring agency shall be notified. The local agency may, after a public hearing, propose to overrule the ALUC by a two-thirds vote of its governing body after it makes specific findings. At least 45 days prior to the decision to overrule the ALUC, the local agency’s governing body shall provide to the ALUC and the Division a copy of the proposed decision and findings. The Division reviews and comments on the specific findings a local government intends to use when proposing to overrule an ALUC. The Division specifically looks at the proposed findings to gauge their relationship to the overrule. Also, pursuant to the PUC 21670 et seq., findings should show evidence that the local agency is minimizing “...the public’s exposure to excessive noise and safety hazards within areas around public airports to the extent that these areas are not already devoted to incompatible uses.”

“Provide a safe, sustainable, integrated and efficient transportation system to enhance California’s economy and livability”
General Plan and Airport Land Use Compatibility Plan Consistency

California Government Code Section 65302.3(a)(b) requires each local agency having jurisdiction over land uses within the ALUC’s planning area to modify its general plan and any affected specific plans to be consistent with the ALUC’s airport land use compatibility plan (ALUCP). A general plan doesn’t need to be identical to the ALUCP to be considered consistent, however, general plans and elements must clearly demonstrate intent to adhere to ALUC policies to ensure compliance with compatibility criteria. Direct conflicts between mapped land use designations in a general plan and the ALUC criteria must be eliminated. A general plan needs to include (at the very least) policies committing the local agency to adopt compatibility criteria essential to ensuring that such conflicts will be avoided.

The general plan also must acknowledge that until ALUC compatibility criteria are incorporated into the general plan, individual development projects within the airport influence area must be submitted to the ALUC for review. These provisions must be included in the general plan at a minimum for it to be considered consistent with the ALUCP.

The Draft Environmental Impact Report (DEIR) for the LUCE update does not indicate that the City will comply with Government Code Section 65302.3(a)(b) with regard to general plan and ALUCP consistency. With the LUCE updates, Caltrans’ interpretation is that the City proposes to create their own new policies and programs for airport land use, noise and safety hazards instead of making the updates consistent with the adopted ALUCP, as required. Therefore, prior to the certification of this project DEIR, the City must overrule the ALUC if it decides the new land use and circulation element policies and programs are inconsistent with the ALUCP, as required by Government Code Section 65302.3(c). Caltrans also believes that if the City has no intention to comply with this section of the Government Code then it must be included in the range of reasonable alternatives to the project where its comparative merits can be evaluated. General Plan and ALUCP consistency is a feasible alternative that would go a long way towards honoring the public’s expectation that local agencies are protecting them from new noise and safety impacts in the vicinity of airports.

Even if the time and expense of an overrule is pursued by the City, the proposed airport programs and policies in the LUCE are so comprehensive that they have the net effect of amending the ALUCP and its policies, circumventing the ALUC’s project review process, and nearly establishing a separate airport land use commission that would replace the County’s. State law does not support such a wholesale transfer of airport land use compatibility planning to any another entity. State law specifically authorizes the establishment of ALUCs in a manner consistent with the law, and authorizes only them to formulate and adopt ALUCPs.

California ALUC law recognizes that countywide land use planning near airports is regionally important and that ALUCs exist in order to balance competing local interests. The law can also prevent local economic interests from outweighing the broader statewide interest in maintaining public airports. Land uses that encroach on airports markedly increases the possibility of new noise and safety problems that can lead to political pressure to restrict or even close the facilities.

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"
Mitigation Measures for Impact LU-2; Impact N-4; and Impact HAZ-2
The LUCE update mitigation measures for land use compatibility (LU-2); airport noise exposure (N-4); and hazards (HAZ-2), state that implementation of the general plan’s new airport area polices and programs will reduce these impacts to less than significant. These mitigation measures cannot be implemented by the City for purposes of reducing impacts to less than significant because here again, there has been no overrule of the ALUCP completed by the City. These impacts should still be considered significant environmental effects of the project. The DEIR does not adequately analyze the significant effects the project might cause by bringing future development and people into the airport planning area.

Handbook
Public Resources Code 21096, requires the California Airport Land Use Planning Handbook (Handbook) be utilized as a resource in the preparation of environmental documents for projects within airport land use compatibility plan boundaries or if such a plan has not been adopted, within two nautical miles of an airport. The Handbook provides a “General Plan Consistency Checklist” in Table 5A and a “Possible Airport Combining Zone Components” in Table 5B. The Handbook is a resource that should be applied to all public use airports and is available on-line at:

Structural Hazards near Airports
PUC Section 21659 prohibits structural hazards near airports. The planned height of buildings, antennas, and other objects should be checked with respect to Federal Aviation Regulation (FAR) Part 77 criteria if development is close to the airport, particularly if situated within the runway approach corridors. General plans must include policies restricting the heights of structures to protect airport airspace. To ensure compliance with FAR Part 77 “Objects Affecting Navigable Airspace” submission of a Notice of Proposed Construction or Alteration (Form 7460-1) to the Federal Aviation Administration (FAA) may be required. Form 7460-1 is available on-line at https://oeaaa.faa.gov/oeaaa/external/portal.jsp and should be submitted electronically.

PUC Section 21688 states that “no payments shall be made from the Aeronautics Account for expenditure on any airport or for the acquisition or development of any airport, if the department determines that the height restrictions around the airport are inadequate to provide reasonable assurance that the landing and taking off of aircraft at the airport will be conducted without obstruction or will be otherwise free from hazards.” The airport-owner must have sufficient control over obstructions in the airspace in the vicinity of the airport to assure that height restrictions can be maintained. This control may be in the form of ownership of any land from which obstructions may rise, air navigation (aviation) easements to guarantee maintenance of restrictions, or height limitation or land use zoning which will prohibit obstructions which would violate the obstruction standards.

The protection of airports from incompatible land use encroachment is vital to California’s economic future. San Luis Obispo Airport is an economic asset that should be protected through effective airport land use compatibility planning and awareness. Although the need for

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California’s economy and livability"
compatible and safe land uses near airports is both a local and State issue, airport land use commissions and airport land use compatibility plans are key to protecting an airport and the people residing and working in the vicinity of an airport. Consideration given to the issue of compatible land uses in the vicinity of an airport should help to relieve future conflicts between airports and their neighbors.

These comments reflect the areas of concern to the Division with respect to airport-related noise, safety, and regional land use planning issues. We advise you to contact our District 5 office concerning surface transportation issues.

Thank you for the opportunity to review and comment on this proposal. If you have any questions, please contact me at (916) 654-6223, or by email at philip_crimmins@dot.ca.gov.

Sincerely,

[Signature]

PHILIP CRIMMINS
Aviation Environmental Specialist

c: State Clearinghouse, San Luis Obispo County ALUC, San Luis Obispo Airport

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and viability"
Response to Comment A5-1

The commenter provides information related to the California Public Utilities Code (PUC) sections that govern referrals and process required of the LUCE update and action by the City of San Luis Obispo to comply with the California State Aeronautics Act (SSA) and the overrule provisions in the SSA. The City has followed the process called out in PUC 21676 et seq. by referring the LUCE update and implementation to the Airport Land Use Commission (ALUC) for a determination of consistency with the San Luis Obispo County Regional Airport Land Use Plan (ALUP). On July 16, 2014, the ALUC found the LUCE update inconsistent with the ALUP. Various sections of the SSA (see, e.g., SSA 21676, 21676.5 and 21677) provide for the City to overrule the ALUC decision. The overruling process involves four mandatory steps: (1) at least 45 days prior to any decision to overrule the ALUC, the City must provide the ALUC and the California Department of Transportation, Division of Aeronautics (Caltrans) a copy of the proposed decision and findings; (2) the holding of a public hearing; (3) the making of specific findings that the action proposed is consistent with the SSA; and (4) Approval of the proposed action by a two-thirds vote of the City Council. On August 19, 2014, the City Council considered the ALUC’s inconsistency determination and considered a draft resolution to reserve the right to overrule the ALUC’s inconsistency finding. That draft resolution (proposed decision) with associated draft findings have been transmitted to the ALUC and Caltrans in compliance with PUC 21676 et seq. The ALUC and Caltrans may provide comments on the proposed overrule decision and findings within 30 days of receiving the documents from the City. If the ALUC and Caltrans fail to act within that time frame, the City may proceed with the overrule. All comments received from the ALUC and Caltrans will be included in the final record of decision and, consistent with the requirements of the SSA, final action on the project will not occur until 45 days after the draft resolution with draft findings has been transmitted to Caltrans and the ALUC in order to provide time for the City Council to consider any subsequent response from both the ALUC and Caltrans.

Response to Comment A5-2

The commenter provides information regarding Government Code Section 65302(a)-(b) requirements for local agencies to make their General Plans consistent with Airport Land Use Plans. The commenter also indicates that comprehensiveness of proposed LUCE policies circumvent the ALUC review process and establish a separate airport land use commission that essentially replaces the ALUC in conflict with State Law. Contrary to the commenter’s assertion, Government Code Section 65302.3(c) expressly allows for the legislative body to overrule the ALUC by adopting specific findings pursuant to SSA 21676 that demonstrate that the action proposed is consistent with the purposes of the SSA. Therefore, the City has not circumvented the ALUC review process; rather, the City has complied with the specific procedures provided in the SSA that allow local agencies to take steps necessary to overrule all or a part of the ALUP. Government Code Section 65302.3(c).

The LUCE update policies, programs, and implementation are designed to demonstrate compliance with Section 3.5 of the State Aeronautics Act, as stated in Section 21670 to protect the public’s “exposure to excessive noise and safety hazards within areas around public airports to the extent that these areas are not already devoted to incompatible uses.” Demonstrating compliance with the State Aeronautics Act requires the City to describe in detail how procedures, development standards and uses, overlay zones, airspace protection, noise, overflight notice and open land objectives will be addressed, however, the City’s proposed policies, programs and implementation do not replace or usurp the ALUC’s authority because the LUCE policies and programs only apply within the City limits and for areas considered under the LUCE update. Local agencies must refer any proposal to adopt or amend a local plan, including general plans and specific plans, to the ALUC for review if the proposal involves land within an airport influence area defined by the ALUC. SSA 21676(b). In addition, proposed zoning ordinances and building regulations must be submitted for ALUC review before being acted upon by the local agency if they affect the compatibility of land uses located within an airport influence area. SSA 21676(b). Therefore, consistent with these requirements, all future projects involving a legislative act, such as a general plan amendment, specific plan or zone change, will be referred to the ALUC for an ALUP consistency determination as reflected in the implementing Airport Overlay Zone section 17.57.030(c). The City’s action does not change approved Specific Plans, which the ALUC found to be consistent with the ALUP such as the Margarita Area Specific Plan.
An EIR must describe a reasonable range of alternatives to the project, or to the location of the project, that could feasibly attain most of the basic objectives of the project while avoiding or substantially lessening any of the significant effects of the project. CEQA Guidelines Section 15126.6(a), (f). The Final EIR determines, based on substantial evidence in the record, that the overrule will not have a significant impact relative to safety, noise, airport land use compatibility or any other component of the environment; therefore, the Final EIR characterizes the policy conflict between the LUCE update and the ALUP as Class 3, less than significant. CEQA requires an EIR to evaluate alternatives that might eliminate or reduce the Project’s significant adverse environmental effects. Because the EIR determines that the policy conflict between the LUCE Update and the ALUP is not a significant impact, CEQA does not require the EIR to evaluate an ALUP-compliant alternative. In other words, an ALUP compliant alternative is not required to be considered by the City because it has determined that the policy conflict between the LUCE and the ALUP is not significant. The City is acting in compliance with Government Code Section 65302(c) and PUC §21676 et seq. through the LUCE update process.

California ALUC law recognizes that countywide land use planning near airports is regionally important and that ALUCs exist in order to balance competing local interests. The law can also prevent local economic interests from outweighing the broader statewide interest in maintaining public airports. Land uses that encroach on airports markedly increase the possibility of new noise and safety problems that can lead to political pressure to restrict or even close the facilities.

As stated in the Caltrans Handbook, “[e]ffective airport land use compatibility planning is not and cannot be solely a function of airport land use commissions ... Ideally, airport land use compatibility planning recognizes the objectives of the local municipal agency which has ultimate authority for land use planning and regulation.....Indeed, ... state law specifically limits ALUC authority over various actions that directly affect compatibility. Much of the responsibility for airport land use compatibility clearly remains with local agencies ...” Caltrans Handbook, pg. 5-1.

ALUC consistency determinations for local agency plans and projects are subject to overrule by the local agency. The overrule process preserves local government’s constitutional land use authority and local government’s ability to implement its plans and projects. Caltrans Handbook, pg. 1-9. Therefore, essentially, and contrary to the commenter’s assertions, the overrule process provides for the important balancing of competing local interests that may not have been adequately taken into account by the ALUC in connection with its ALUP policies.

Response to Comment A5-3
The commenter asserts that mitigation measures LU-2, N-4 and HAZ-2 cannot be implemented by the City for purposes of reducing impacts to less than significant because no overrule of the ALUP has been completed and significant effects have not been adequately analyzed.

The commenter is incorrect that the LUCE EIR identified Impact LU-2, N-4, and HAZ-2 as mitigation measures. The EIR in fact, found that with the implementation of policies and programs contained in the LUCE Update, impacts would be less than significant and no mitigation measures are required.

It is important to distinguish the CEQA process for evaluating and analyzing significant environmental impacts and adopting mitigation measures from the overrule process provided for in the California State Aeronautics Act (SAA).

For purposes of CEQA, Public Resources Code Section 21002 requires agencies to adopt feasible mitigation measures in order to substantially lessen or avoid otherwise significant adverse environmental impacts. To effectuate this requirement, an EIR must set forth mitigation measures that decision makers can adopt at the findings stage of the CEQA process. CEQA 21100(b)(3), CEQA Guidelines 15126(e). The DEIR provides a complete analysis of the potentially significant impacts relating to land use compatibility, airport noise exposure and hazards based on substantial evidence in the record (as summarized, in part, below). The City will consider adoption of policies (along with any recommended mitigation) when considering certification of the EIR and approval of the project. If approved, the City will be required through implementation of the mitigation monitoring and reporting program to implement the adopted mitigation measures. This CEQA process is independent from the ALUC overrule process.

Noise related to current or future airport operations was not identified as a significant impact. Section §15002(g) defines significant effect as “a substantial adverse change in the physical conditions which exist in the area affected by the proposed project.” The DEIR provides detailed evaluation of potential physical impacts to the environment in the form of noise and hazards as required by CEQA. Technical appendix F (Airport Compatibility Report prepared by Johnson Aviation) supports the EIR with information related to the adopted Airport Master Plan (AMP) and approved FAA operational
forecast contained therein. The aircraft noise analysis prepared for the Airport Master Plan Environmental Impact Report is documented in Chapter 5 of the Airport Master Plan EIR. The assumptions regarding aircraft operations amounts, types, spatial and temporal distribution is reflected in Figure 5.1-6 of the AMP EIR. The AMP EIR operations assumptions were entered into the Integrated Noise Model version 7.0d and generated noise contours that were compared to the AMP EIR on page 52 of the Compatibility Report. The resultant noise contours confirmed the AMP EIR information as an accurate mapping of the long term noise impact of the airport’s aviation activity that is tied to the ultimate facilities development depicted in the FAA-approved Airport Layout Plan. The City’s use of the Airport Master Plan noise contours for purposes of development of its LUCE Update noise contours and the application of a 60 dB CNEL exterior noise standard and 45 dB CNEL interior noise standard for new residential uses is appropriate and is consistent with FAA and State aircraft noise planning standards (Handbook, Page 4-46).

Separate and apart from CEQA requirements, the City is required to comply with the requirements of the SAA. CEQA allows, but does not require, an agency overrule of the ALUP to mitigate potential physical effects identified in the EIR. In this case, the Final EIR does not identify a significant impact related to the inconsistencies between the ALUP and the LUCE update so no mitigation is necessary. Specifically, the analysis provided in the DEIR indicates that land use development patterns provided in the LUCE Update (based on guidance in the California Airport Land Use Planning Handbook and FAA standards) will not generate significant physical environmental safety impacts. LUCE Policies and implementation through an Airport Overlay Zone provide both a policy frame work and standards for development to ensure that development is consistent with allowable densities, height limitation, allowable uses, and other safety standards to ensure that development is evaluated for consistency with the State Aeronautics’ Act requirements. The LUCE Update policies and implementing Airport Overlay Zone Regulations require compliance with State law, Caltrans Aeronautics guidance for planning land uses around the airport, and Federal Aviation Administration requirements relating to height and safety issues. LUCE update policies included in the EIR require compliance with State and Federal guidance and laws. The City went through an extensive effort to ensure that the City’s LUCE policies: (1) are consistent with the purposes of the State Aeronautics Act, as stated in Section 21670; (2) are consistent with the Caltrans Handbook’s policies and recommendations relating to safety, overflight, airspace protection and noise; and (3) that the LUCE policies do not adversely impact the public health, welfare and safety or airport operations. All of the policies in the LUCE are based on substantial evidence provided in the EIR, including information in the Airport Land Use Compatibility Report included as a technical appendix to the LUCE Update EIR and incorporated by reference. This report includes a careful examination of the existing and proposed airport facilities, operations, and local procedures; weather, topography, aircraft accidents and incidents. The report also includes a careful examination of the County approved Airport Master Plan, FAA-approved Airport Layout Plan and application of Federal Aviation Regulation (FAR) Part 77 obstruction analysis. The report also includes recommendations for LUCE policies consistent with the purposes of the State Aeronautics Act and guidelines provided in the Caltrans Handbook. Therefore, the LUCE policies and programs and associated implementation through creation of an Airport Overlay Zone is based on substantial evidence and is consistent with the purposes of Article 3.5 of the State Aeronautics Act as stated in Section 21670, to minimize the public’s exposure to excessive noise and safety hazards and to not impact public health, welfare and safety or existing and future airport operations.

All of this information has been taken into account in connection with the draft findings (provided to the ALUC and Caltrans) that show that the proposed adoption of the LUCE Update is consistent with the purposes of Section 21670 of the SAA. The purpose of the findings and the proposed overrule is to assure compliance with state law separate and apart from the compliance requirements of CEQA.

Response to Comment A5-4
The commenter provides information regarding the California Airport Land Use Planning Handbook. Technical Appendix F of the EIR used this document extensively in evaluating potential physical effects of the LUCE update and proposed implementation through an Airport Overlay Zone. Comment noted.

Response to Comment A5-5
Commenter notes that General plans must include policies restricting the heights of structures to protect airport airspace and notes PUC §21688 which prohibits payments from the Aeronautics Account for airport improvements if there are inadequate restrictions regarding obstructions and hazards. Review processes and height restrictions supported through
the LUCE and Airport Overlay Zone require compliance with the FAR Part 77 federal standards as stated in draft Program 7.3.12, Airport Overlay Zone. Therefore, the Draft LUCE update and associated implementation through an Airport Overlay Zone, which reflect the Handbook guidance for the most recent Airport Master Plan, will protect airspace and will not impact the Airport’s ability to qualify for payments from the Aeronautics Account to support airport development as stated in PUC Section 21659. Airport Overlay Zone Section 17.57.060 contains Airspace Protection standards to reduce the risk of harm to people and property resulting from an aircraft accident by preventing the creation of land use features and prohibition of any activities that can pose hazards to the airspace used by aircraft in flight, consistent with recommendations beginning on Page 4-34 of the Handbook. Pursuant to Federal Aviation Regulation (FAR Part 77) and Public Utilities Code (PUC) Section 21659, the Airport Overlay Zone 17.57.060 ensures that no structures shall penetrate the airspace protection surfaces of the airport without a permit from the California Department of Transportation, or a determination by the Federal Aviation Administration (FAA) that the object does not constitute a hazard to air navigation or would not create an unsafe condition for air navigation. The LUCE and associated Airport Overlay Zone implement this guidance in compliance with Handbook Chapter 3. Building permits for such structures shall not be issued until a Determination of No Hazard has been issued by the FAA and any conditions in that Determination are met. Approvals for such projects may include the requirement for an aviation easement, marking or lighting of the structure, or modifications to the structure. Implementation of the LUCE in the form of overlay zone standards provides details, however to augment policy clarity regarding federal standards, an additional policy is recommended for Chapter 7 of the Land Use Element to read as follows:

**7.** **X** **Airspace Protection**

The City shall use the Airport Master Plan Update and FAA airport design standards and Part 77 surfaces to keep the airspace surrounding the airport free of objects where required by the FAA or shall limit the height of objects as required by the FAA.

The City shall also ensure obstruction clearance is provided for all en route and terminal (airport) instrument procedures as per the United States Standard for Terminal Instrument Procedures (TERPS) to avert modifications to any planned or published instrument approach or instrument departure procedures at SBP.

To help ensure protection of the airspace essential to the safe operation of aircraft at and around the Airport, the FAA has established a process that requires project sponsors to inform the agency about proposed construction that could affect navigable airspace. The standards by which the FAA conducts these aeronautical studies are set forth in FAR Part 77, Objects Affecting Navigable Airspace. Consistent with these airspace protection policy foundations, the City will use information in the Airport Master Plan Update as well as FAA airport design standards and Part 77 surfaces to keep the airspace surrounding the airport free of objects where required by the FAA or shall limit the height of objects as required by the FAA.

In addition to the FAR Part 77 surfaces, there are other airspace surfaces that are evaluated by the FAA for obstructions. The United States Standard for Terminal Instrument Procedures (TERPS), as described in FAA Order 8260.3B, establishes clearance requirements for all en-route and terminal (airport) instrument procedures including approach, landing, missed approach and departure. The TERPS clearance surfaces exactly match the instrument procedures in effect at the Airport. Unlike FAR Part 77 surfaces, the elevations of which are set relative to the runway end elevations irrespective of surrounding terrain and obstacles, the TERPS surface elevations are directly determined by the location and elevation of critical obstacles. By design, neither the ground nor any obstacles can penetrate a TERPS surface.

Consistent with information provided in the EIR and supporting technical report, the LUCE Update policies will ensure compliance with the TERPS clearance surfaces.
July 28, 2014

Kim Murry, Deputy Director
Community Development Department
City of San Luis Obispo
919 Palm Street
San Luis Obispo, CA 93401

RE: City of San Luis Obispo Land Use and Circulation Element Draft Environmental Impact Report (DEIR)

Ms. Murry,

This letter is to commend the City for the extensive effort they’ve put into this update of the Land Use and Circulation Element (LUCE) for San Luis Obispo. San Luis Obispo Council of Governments (SLOCOG) is the Regional Transportation Planning Agency and Metropolitan Planning Organization, as such our board is responsible for developing the Regional Housing Needs Plan, Regional Transportation Plan, and funding regionally significant transportation projects that enhance the economy, provide for access by all modes, and bring unique value to the region. Furthermore, with the adoption of SB 375, SLOCOG is tasked with developing a Sustainable Communities Strategy to improve reduce greenhouse gas emissions through a comprehensive regional land use and circulation approach. SLOCOG is currently developing the 2014 RTP/SCS, which is required to be compliant with SB 375.

SLOCOG is very supportive of the land use and circulation improvements and policies in the LUCE update. They go a long way in addressing regional growth anticipated in the area in a manner consistent with SLOCOG’s 2010 Regional Transportation Plan and Preliminary Sustainable Communities Strategy, including the following:

1. Accommodating residential growth in addition to employment to reduce regional commuting
2. Providing more compact mixed development – in target development areas (as defined in SLOCOG’s 2010 RTP/PSCS)
3. Focusing on all modes of transportation with an objective to improve alternative transportation mode share

We believe the benefits of providing the growth documented in this plan are underestimated in the DEIR. From a regional perspective, increasing housing in San Luis Obispo, which is the main job center in the region, would have an indirect impact of reducing commuting in and out of the city. Without this additional development there would be a detrimental impact on congestion, VMT, and greenhouse gas emissions from people residing outside the City and commuting to SLO on Highways 1, 101, 227, and Los Osos Valley Road. This is critically important as projected volumes on 101 and 227 will exceed capacity with little to no funding for expansion. We believe these benefits should be recognized, where appropriate, throughout the document.

We also support many of the major circulation improvements that would be needed to accompany growth including improved east/west and north/south connections in the high growth areas of the city. Of particular importance is the extension of Prado Road connecting to Broad Street on the east and...
Madonna and/or LOVR on the west. We are pleased to see the plan and EIR acknowledge the need and potential for a new regional transit center in the downtown core.

The pages that follow this letter include specific comments and suggestions on the DEIR as well as the Draft Land Use and Circulation Elements.

However, the following are several general comments:

1. San Luis Obispo should continue to work with the Rideshare division of SLOCOG to require, implement, and/or monitor Transportation Demand Management strategies with all new development in the City.

2. The City should also work with SLOCOG and San Luis Obispo County where growth areas in the City impact the County, for example: development in the southern portion of the City near Tank Farm continues to put pressure on State Route 227.

3. SLOCOG continues to have concerns about how to implement a cost effective and useful improvement at the State Route 1/Highway 101 interchange. This location continues to be impacted by local and regional travel, along with a very expensive project cost.

4. SLOCOG and San Luis Obispo should be very involved with the development of Cal Poly’s upcoming Master Plan update. Decisions about student population and transportation are intrinsically linked to regional and local public transit, surface transportation, and parking. Efforts should be made to work collaboratively.

Overall we are pleased with the City’s work: the thorough public participation process, accessibility and readability of the document, and content are well executed. SLOCOG looks forward to continuing to work with the City on various transportation projects in the future.

If you have any questions or concerns please contact me at 781-4251 or Jessica Berry at 781-5764.

Sincerely,

Ronald L. De Carli
Executive Director
Specific Comments on the Draft Program EIR (Volume I)

PDF Page 5 (Acknowledgments): Councilmember John Ashbaugh’s last name is misspelled.

Page ES-1: the bottom paragraph and the subsequent Matrix (page 2) deserve a map (even if it is already in the full document), showing at least all sites with proposed changes. Also there is no explanation as to the sources of those numbers (units, population, employment and sq ft). Are those based on City planning staff estimates or approved documents submitted by developers? Can those numbers be dated? Except for L (San Luis Specific Plan area), the numbers of housing units/population are very small. Overall, once combined, they do not seem to address the need for a better jobs housing balance, a current regional deficiency.

Page ES-3: the site K called “Sunset Drive/Paso Road” is only referring to accommodating Homeless Services Center; an explicit reference to the RTA new regional maintenance/administrative facility should be made. A brief mention of the compatibility among both uses (especially noise levels after hours) is also recommended as one aspect in need of careful planning. In addition, the City should start thinking about future plans for the two existing homeless sites, which will eventually be vacated (Prado next to the City wastewater treatment plant and Orcutt near Broad).

Page ES-6: clearly states the objectives of the new Land Use element; however the 3rd bullet “Respond to new state planning requirements” is vague; some elaboration on the key new requirements is desirable, as it might better explain the scope/location or scale of proposed changes.

Page ES-7: We concur with the discussion of the “Reduced Development Alternative” which notes that it “could promote additional development in other areas…” We concur that the Maximum Development Alternative provides a major benefit in reducing commuting and hence a reduction “regional vehicle miles traveled, greenhouse gases, and more importantly traffic on the major corridors that enter into the city, namely, Highways 1, 227, and 101, and Los Osos Valley road”. In particular we believe this positive benefit should be discussed where appropriate in the EIR such as in EIR Impact CIR -3.

Page ES-9 (PDF 25): Impact LU-1 and Mitigation Measures (Class I impacts)
SLOCOG Comment: Policies and strategies in SLOCOG's 2010 RTP/PSCS is supportive of new residential and employment growth being located in or immediately adjacent to existing communities (see policy language below, PSCS Strategy 9 and PSCS Strategy 13). Not locating new housing development in or adjacent to existing communities could push new housing to be built in rural areas or in other areas that are not proximate to existing employment centers and daily services. SLOCOG supports the location of the Avila Ranch Specific Plan Area at the planned build-out capacity as this new growth area is proximate to existing employment centers and daily services. As Avila Ranch Specific Plan Area is a new growth area that is: (1) already located within the City limits, and (2) immediately adjacent to the existing development footprint of the City, this new growth area supports the goals of the 2010 RTP/PSCS as well as the 2014 Regional Transportation Plan/Sustainable Communities Strategy (2014 RTP/SCS) – currently in development – as the “preferred growth scenario” is expected to support the majority of new housing and new employment being located in existing cities and communities.

- PSCS Strategy 9: Support existing communities. Target funding toward existing communities to improve the efficiency of public works investments and increase community revitalization through such strategies as providing for transit-oriented, mixed-use development, land recycling, and safeguarding rural landscapes.
• PSCS Strategy 13. Promote the direction of most new residential development away from rural areas and concentrate it in higher density locations near major transportation corridors and transit routes, where resources and services are available.

Page ES-11: Impact CIR3, increasing traffic on freeway facilities. We recommend the noted discussion on mitigation be expanded to discuss ongoing city support for Regional Transit Authority system expansions that provide transit services into SLO; regional Ridesharing Programs, including Employer Trip Reduction Programs and regional van-pool programs. We also request the EIR add a mitigation measure to provide Park and Ride lots for ALL major commercial shopping centers in the region.

Page ES-6 (PDF 22): Table reference should be “ES-1” not “EX-1”.

Page 4-237 (PDF 335): Under section d. Regulatory Setting, the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) is inaccurately referenced. The SCS, when spelled out, is “Sustainable Communities Strategy”, not “Sustainable Community Strategy”. In 2010, SLOCOG adopted the 2010 Regional Transportation Plan/Preliminary Sustainable Communities Strategy (RTP/SCS), as the agency was not required during that RTP update cycle to develop an SB 375-compliant SCS, but elected to develop a similar document in order to test and develop future land use and travel demand modeling tools. SLOCOG is currently developing the 2014 RTP/SCS, which is required to be compliant with SB 375.

Page 4-283 (PDF 381): In April 2014, the SLOCOG Board voted to adopt the “Low” population projections from the 2040 Regional Growth Forecast. This was a change from what was originally adopted in August 2011, when the SLOCOG Board adopted the “Mid” population projections. Given this, the estimated increase in population from year 2010 to 2035 for the City of San Luis Obispo is 4,271 (as opposed to the stated 4,613). Additionally, the stated 2010 population in Table 4.12-2 (43,937) reflects the household population, as opposed to the total population (inclusive of group quarters population). San Luis Obispo has a significant group quarters population (including off-campus student housing), which is not being reflected in this table. The 2010 population (based on the 2010 Census) is 45,119 (a difference of 1,182; which is likely equivalent to the City’s group quarters population). As a note, the total population figure is noted correctly in Table 4.12-1 on the same page. This discrepancy between these two tables should be corrected.

Page 7-14 (PDF 516): Under the list of references for Section 4.10 (Land Use), SLOCOG’s 2010 RTP/SCS is inaccurately referenced as the “Regional Transportation Plan/Sustainable Community Strategy”; it should be referenced as “Regional Transportation Plan/Preliminary Sustainable Communities Strategy”.

Project Specific Discussion (related to Tables on pages ES-3 through ES-55):

Discussion of the Santa Rosa (Highway 1)/ US 101 Interchange:
It appears the study provides a very cursory analysis of the proposed consolidation of on/off ramps that serve the Santa Rosa IC, including both the northbound and southbound on/off hook ramps at Broad Street. We believe the study properly identifies the benefits, largely associated with reducing traffic in neighborhoods. It should also emphasize the operational benefits on Highway 101 that would reduce the extensive merging issues that currently exists. Key concerns with this proposal that we believe should have more analysis and discussion include the following:
a. Consolidation of traffic on Santa Rosa would likely result in poor to failing performance on Santa Rosa, which service levels are currently poor. This would include its intersections with Foothill and Murray Street. Additional traffic would likely simultaneously require the widening of Santa Rosa north of its intersection with 101 to at least Foothill Blvd, and possibly to Highland. The EIR should address this issue and the resultant costs and right of way impacts on property abutting Santa Rosa.

b. Impacts on the Santa Rosa Bridge over Highway 101. Prior analysis undertaken by Caltrans on this site noted the need to remove and rebuild the structure to meet height standards over 101. The current structure is substandard. Caltrans has noted that any improvement at this location would require bringing the structure up to full standards. This must also be addressed in your discussion.

c. ROW impacts associated with a new consolidated interchange at 1/101. Prior studies with Caltrans and the city indicated significant ROW takes that would impact property in every quadrant. Exceptions to standard design would be required and may not necessarily be supported by Caltrans. This must similarly be addressed in the EIR.

d. Ultimate costs and ability to fund. In this current funding environment the potential of a major improvement that would address the above is not very likely. We recommend the EIR discuss the congestion that will occur if this proposed project does NOT happen; and identify various alternative improvements to address the congestion. Caltrans had prepared a prior Project Study Report that identified a host of lower cost operational improvements that could be implemented to address spot congestion issues. We believe these should be more thoroughly addressed in the EIR.

**Prado overcrossing.** We believe there should be more discussion on the potential impacts of either an interchange or an overpass. Prior studies on Prado Road indicated that the level of growth anticipated in the city would have a detrimental impact on both LOVR and Madonna Road interchanges. The extent of that impact should be more thoroughly vented in the EIR, addressing the level of anticipated congestion, as well, as the potential impacts of their mitigation on further widening of either interchange.

**Train Station.** The plan and EIR provides a nominal discussion of the train station. There are active efforts to expand the level of passenger rail services to the region. This will have an impact on the functionality of the train station, this would include the need to revamp, upgrade the station, and the need to address parking. Current parking is now insufficient; the EIR should clarify this issue and identify approaches towards further mitigation.

**Sunset Drive /Prado Site.** Any discussion on this site, should discuss the recent acquisition of a parcel by the Regional Transit Authority for a future Maintenance Facility, in addition to the discussion of the proposed Homeless Shelter.

**Orcutt Road Overpass.** The plan recommends retention of this project. SLOCOG did initially plan for this overcrossing but at the request of the city, SLOCOG funds were redirected to improving the at-grade RR crossing. The Overpass is not in the current Regional Transportation Plan, nor based on funding constraints, will staff recommend it be included in the future update. We recommend the Plan and EIR recognize this issue.
Comments on Draft Land Use Element (Volume II, Appendix A)

Page 8 (PDF 12, Map of Planning Area and LUCE SOI Planning Subarea)
- Avila Beach Rd. is inaccurately labeled as Diablo Canyon Rd.
- Source of map/data notes “City of San Luis Obispo”; this typo should be corrected.
- Map inaccurately reflects Union Pacific Railroad ending a few miles south of San Luis Obispo and a few miles north San Luis Obispo, rather than reflecting that the railroad exists north and south of these termini.
- Map inaccurately reflects a portion of Madonna Rd., South St., and Broad St. as “state highway” when these roadways should be reflected as “major roads”.
- Madonna Rd. and Tank Farm Rd. are not reflected as “major roads”, when in effect they probably should be for the purposes on this map.

Page 9 (PDF 13, Map of Urban Reserve)
- Source of map/data notes “City of San Luis Obispo”; this typo should be corrected.
- The map labelling schema makes the map difficult to read; labelling could be improved to improve map legibility.
- The map inaccurately reflects a portion of Madonna Rd., South St., and Broad St. as “state highway” when these roadways should be reflected as “major roads”.

Page 15 (PDF 19, re: Community’s Goals)
Goal category: Environment
An added goal to the City’s existing General Plan states the following regarding the Environment: San Luis Obispo should: Support statewide and regional efforts to create more sustainable communities, reduce greenhouse gas emissions, and develop transportation systems that support all modes of circulation.
SLOCOG: Great! SLOCOG supports the City explicitly stating their support for statewide and regional efforts to reduce GHG emissions and plan for and create more sustainable communities at a local and regional level.

Page 16 (PDF 20, re: Community’s Goals)
Goal category: City Form
An added goal to the City’s existing General Plan states the following regarding City Form: San Luis Obispo should: Where appropriate, create compact, mixed-use neighborhoods that locate housing, jobs, recreation, and other daily needs in close proximity to one another, while protecting the quality of life in established neighborhoods.
SLOCOG: Great! SLOCOG supports local jurisdictions doing what they can to foster and create compact, mixed-use neighborhoods within the existing development footprint of cities and other urbanized areas of the region. This includes ensuring that new residential developments are located within a reasonable distance from existing or future employment centers, existing or future recreation areas, and from existing or future commercial areas that help meet daily needs of community members.
This new policy is consistent with SLOCOG’s 2010 RTP/PSCS; in particular, the following policy.
PSCS Policy 5: Support compact, mixed-use and infill development in target development areas and within 1/3-mile of major transit stops and centers; and, encourage incentives such as funding, flexible standards and streamlined permit processing for mixed-use and affordable housing.

Page 118 (PDF 118, re: Chapter 9. Sustainability)
Section 9.3.2 Regional Coordination
The City shall work with SLOCOG to develop and periodically update the Sustainable Communities Strategy as part of the Regional Transportation Planning process and SLOCOG shall be encouraged to consider the City’s General Plan when developing the Sustainable Communities Strategy.

SLOCOG: Excellent! We will continue to work with and coordinate with the City to ensure that the Sustainable Communities Strategy is consistent with the land use development patterns as identified in the City’s General Plan; subsequent updates to the SCS shall continue to be consistent with the City’s General Plan.

Comments on Draft Circulation Element (Volume II, Appendix B):

Page 13
3.0.3 Paratransit Service
FTA current use of terms is no longer “elderly and handicapped”; it is now referred to as “seniors and persons with disabilities”. (The latter is particularly sensitive, as it allows to present the person as not necessarily “afflicted” with the disability, but happening to have it potentially for only a limited period of time-similar to persons of low income).

Page 24
7.1.2 Transportation Monitoring
As funding permits the City shall implement an ongoing and comprehensive transportation monitoring program that, at a minimum, will keep track of (on a bi-annual basis):

- Changes in traffic volumes throughout the city.
- Changes to the Level of Service (LOS) on arterial streets, regional routes and highways.
- Traffic speeds.
- Changes in the use of bicycle and pedestrian facilities.
- Changes in streetscape features.
- The location, type and frequency of accidents.

SLOCOG: We are supportive of the City’s effort. Performance monitoring is becoming more and more important at the State and Federal level, tracking improvements based on infrastructure will help as SLOCOG programs CMAQ and other state and federal funds.

Page 50
15.0.5 Scenic Highways
The City will promote the creation of Scenic Highways within San Luis Obispo and adjoining county areas. This support can happen when:

A. Reviewing draft county general plan elements or major revisions to them.
B. Reviewing changes to the Regional Transportation Plan (RTP) as a member agency of the San Luis Obispo Council Regional Transportation Agency.
C. Reviewing development projects that are referred to the city that are located along routes shown in the Conservation and Open Space Element.
D. Actively participating in the development and periodic updates of the US 101 Aesthetic Study of San Luis Obispo County.
SLOCOG: This is technically incorrect. SLOCOG is not working on an aesthetic study, Caltrans is. Please remove reference. SLOCOG does value the City of San Luis Obispo’s active participation in the Scenic Byway Committee.

Page 56
16.0.6 New Policy
The City shall encourage SLOCOG to consider initiating a county wide revenue measure devoted to local transportation funding on the basis of population, so that San Luis Obispo County becomes a “self help” county.
SLOCOG: Thank you. SLOCOG appreciates the City’s support in securing additional local/regional funds for important transportation improvements.
Response to Comment A6-1
This comment provides general support for the proposed LUCE Update project as it relates to the regional growth outlined in the LUCE Update, and general consistency with the SLOCOG 2010 Regional Transportation Plan and Preliminary Sustainable Communities Strategy. The comment has been noted and will be provided to the Planning Commission and City Council for consideration in the decision making process.

Response to Comment A6-2
The City concurs with this comment regarding on-going coordination with SLOCOG, and policies and programs of the proposed Circulation Element are consistent with this comment. Policies and programs that will implement on-going coordination with SLOCOG include, but are not limited to: 3.0.5, Unmet Transit Needs; 3.1.1, Transit Plans; 7.1.4, Transportation Model; and 16.0.1, City and Regional Growth.

Response to Comment A6-3
Please refer to response A6-2.

Response to Comment A6-4
This comment expresses concerns related to future improvements at the State Route 1/Highway 101 interchange. Although the information provided by this comment does not pertain to the adequacy of the environmental impact analysis provided by the Draft EIR, the comment has been noted and will be provided to the Planning Commission and City Council for consideration in the decision-making process.

Please also refer to Master Response #1, Comments Specific to the LUCE Update Concepts and/or Policies.

Response to Comment A6-5
The coordination requested in this comment is covered under Polices 1.11.1 and 1.11.2 in the proposed Land Use Element.

Response to Comment A6-6
Thank you for this clarification. The “Acknowledgements” section of the EIR has been edited as follows:

- John Ashbaugh

Response to Comment A6-7
The Commenter requests additional maps to illustrate alternatives and a source added to tables in the Executive Summary. A new Figure ES-1 will be added to the Executive Summary. The new figure will be in-concert with Figure 2.4-3 of the Draft Program EIR. The following source line will be added to the table being referenced in the Executive Summary:


For response to the inquiry on jobs/housing balance, please refer to Master Response #3, Jobs/Housing Balance.

Response to Comment A6-8
The Sunset Drive-In/Prado Road Site (Site K) is described by the EIR as a “mixed use” site but also references transit facility use. Language in Chapter 8 of the Land Use Element for this site states, “Property within the area may need to be designed to accommodate the Homeless Services Center and/or transportation agency use.” The City acknowledges that future development projects that may be located on Site K will be subject to project-specific environmental review consistent with the requirements of CEQA and City Policy 12.3.11, Environmental Review. The potential for land use conflicts between specific details associated with proposed on-site uses will be evaluated at that time.

Please also refer to Master Response #2, Programmatic Nature of the EIR.
Response to Comment A6-9
The Project objective of responding to new state planning requirements pertains primarily to proposed policy revisions rather than proposed development areas. Examples of new state planning requirements that are reflected by proposed policy revisions include, but are not limited to: climate change and other sustainability programs; airport land use planning; and water resource planning requirements.

Response to Comment A6-10
The City appreciates SLOCOG’s concurrence with the alternative analysis provided by the EIR. However, the evaluation of alternatives to the proposed project should be separate from the evaluation of project-related impacts. Therefore, the request to include a discussion of alternatives to the proposed project under project-related impact CIR-3 would not be consistent with the organization of the EIR. Please refer to Section 6.0, Alternatives, for more information.

Response to Comment A6-11
This comment provides general support for the proposed LUCE Update project as it relates to the location of the Avila Ranch Specific Plan and infill development. The comment has been noted and will be provided to the Planning Commission and City Council for consideration in the decision making process.

Response to Comment A6-12
The commenter suggested mentioning the City’s ongoing support of San Luis Obispo Regional Transit Authority’s (SLORTA’s) system expansions and regional ridesharing programs in the mitigation discussion for Impact CIR-3. The commenter also requested a new mitigation to provide park and ride lots for all major commercial shopping centers. The mitigations discussion for Impact CIR-3, pages ES-11 and 4-347, has been modified as follows:

As future development under the LUCE Update is proposed, the City will be required to ensure consistency with the General Plan and the policies/programs listed above. However, with the incorporation of the Proposed Project, adherence to proposed and existing City policies and programs discussed above, and continued support of Caltrans’, and SLOCOG’s and SLORTA’s efforts to address demand on US 101 in the vicinity of San Luis Obispo, these mitigation measures would not mitigate the impacts and widening to 6 lanes is not feasible.

The provision of park and ride lots is supported by policies in the LUCE. Specifically, Circulation Element policy 13.1.3 states, “The City shall coordinate with SLOCOG during periodic updates to SLOCOG’s Park and Ride Lot Development report to evaluate the need for and location of park-and-ride lots to serve commuters.” Identification of locations for park and ride lots is being addressed through the SLOCOG US 101 Mobility Master Plan (currently under development).

Response to Comment A6-13
Thank you for this clarification. The reference to Table ES-1, in Section ES-1.3 on page ES-6, has been corrected in the Final EIR as follows:

Table EXES-1

Response to Comment A6-14
Thank you for this clarification. The text on page 4-237 has been revised in the Final EIR as follows:

Sustainable Community-Communities Strategy

Response to Comment A6-15
This comment provides suggestions for the revision of the Daft EIR’s discussion of SLOCOG population and housing projections. The Draft EIR used the “Mid” projections for population and housing included as a part of the 2040 Regional Growth Forecast first released in August 2011. The comment references the SLOCOG Board’s vote to adopt the “Low” population projections in April 2014. The City has revised the text and tables to reflect “Low” projections for population and households.

The comment also requests that the City recognize that these projections are for household population, not total population. Since the SLOCOG projections do not consider group quarters, the City will add an approximation of group quarter population to all household population totals. Using the difference between the 2010 total population from the
Census and the 2010 household population from SLOCOG (1,182) as a rough estimate of group quarters, the City will then add 1,182 to the population totals in 2010, 2020, and 2035. As such, this addition will not affect the change between 2010 and 2035.

**Changes to the text:**

**SLOCOG Housing, Population, and Employment Projections.** In 2011 the San Luis Obispo Council of Governments (SLOCOG) projected population, housing, and employment for jurisdictions in San Luis Obispo County through 2035. The following tables provide a summary of the SLOCOG forecast which were developed prior to 2010 census data being available. As shown in the Table 2.3-4, SLOCOG developed low, medium, and high projections for population, housing units, and employment. The demand assumptions use the mid estimates for anticipated demand for population, housing units, and employment, and the low estimates for anticipated demand for population and housing based on revised projections adopted by the SLOCGO Board adopted in April 2014. For population, 1,182 units were added to 2010, 2020, and 2035 in order to account for group quarters population.

The city of San Luis Obispo population in 2010 was estimated to be 43,937. The population is anticipated to increase to 45,969 by 2020 and 48,550 by 2035. This means the city will add an additional 4,613 people (10.9 percent) between 2010 and 2035. SLOCOG estimates that the city of San Luis Obispo had 20,553 housing units in 2010. The number of housing units in the city is anticipated to increase to 21,526 by 2020 and 23,204 by 2035. This means the city will add an additional 2,651 housing units (13.1 percent) between 2010 and 2035, including 1,060 single family and 1,591 multifamily units. The city of San Luis Obispo had 33,000 jobs in 2010. Employment is anticipated to increase to 36,900 jobs by 2020 and 42,400 jobs by 2035; an increase of 9,400 jobs (30 percent) between 2010 and 2035. The city of San Luis Obispo had a total of 18,150 square feet of non-residential development in 2010, an estimate based on the number of jobs in San Luis Obispo in 2010. Non-residential development is anticipated to increase to 20,295 square feet by 2020 and 23,320 square feet by 2035. This means the city will add an additional 5,170 square feet by 2035.
### Table 2.3-4 Estimated and Projected Housing Units

<table>
<thead>
<tr>
<th></th>
<th>2010</th>
<th>2020</th>
<th>2035</th>
<th>2010-2035</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Low</td>
<td>Mid</td>
<td>High</td>
<td>Low</td>
</tr>
<tr>
<td>Population¹</td>
<td>45,119,937</td>
<td>45,119,937</td>
<td>47,146,964</td>
<td>47,151,969</td>
</tr>
<tr>
<td>Housing Units</td>
<td>20,553</td>
<td>20,553</td>
<td>20,553</td>
<td>21,523</td>
</tr>
<tr>
<td>Employment</td>
<td>33,000</td>
<td>33,000</td>
<td>33,000</td>
<td>36,900</td>
</tr>
<tr>
<td>Non-Residential Development²</td>
<td>18,150,00</td>
<td>20,295,00</td>
<td>23,320,00</td>
<td>5,170,00</td>
</tr>
</tbody>
</table>

¹ 1,182 units are added to SLOCOG 2040 Regional Population Forecast to account for group quarters. SLOCOG population forecast is based on 1.75 persons/household.

² Estimated using 550 non-residential square feet per job.

Source: SLO County 2040 Population, Housing, and Employment Forecast (2011)
Changes to the text:
As part of its regional planning functions, the San Luis Obispo Council of Governments (SLOCOG) develops and publishes regional population and housing forecasts for the County and its communities. Based largely on information provided by the City, projections prepared by SLOCOG in 2011 indicate that the City will have a population increase of 4,271 people between 2010 and 2035 (Table 4.12-2).

Table 4.12-2 Existing and Projected Household Population, City of San Luis Obispo

<table>
<thead>
<tr>
<th></th>
<th>2010</th>
<th>2020</th>
<th>2035</th>
<th>Change between 2010 and 2035</th>
</tr>
</thead>
<tbody>
<tr>
<td>Low</td>
<td>43,93745,119</td>
<td>45,96447,149</td>
<td>48,20849,390</td>
<td>4,271</td>
</tr>
<tr>
<td>Mid</td>
<td>43,93745,119</td>
<td>45,96947,151</td>
<td>48,55049,732</td>
<td>4,613</td>
</tr>
<tr>
<td>High</td>
<td>43,93745,119</td>
<td>45,97247,154</td>
<td>48,86050,042</td>
<td>4,923</td>
</tr>
</tbody>
</table>

Note: 1,182 units are added to SLOCOG 2040 Regional Population Forecast to account for group quarters.
Source: General Plan Background Report, 2014

SLOCOG prepared housing unit projections for the City of San Luis Obispo in 2011 based largely on information provided by the City. The projections show that between 2010 and 2035, the number of housing units in the City is expected to increase by 2,429 units (Table 4.12-3).

Table 4.12-3 Existing and Projected Housing Units, City of San Luis Obispo

<table>
<thead>
<tr>
<th></th>
<th>2010</th>
<th>2020</th>
<th>2035</th>
<th>Change between 2010 and 2035*</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Total Units</td>
</tr>
<tr>
<td>Mid</td>
<td>20,553</td>
<td>21,526</td>
<td>23,204</td>
<td>2,651</td>
</tr>
<tr>
<td>High</td>
<td>20,553</td>
<td>21,526</td>
<td>23,405</td>
<td>2,852</td>
</tr>
</tbody>
</table>

*Unit split based on RHNA assumed construction ratio of single family to multifamily housing of 40:60
Source: SLOCOG 2040 Population, Housing, and Employment Forecast (2011)

Table 4.12-5 Existing and Projected Population and Dwelling Unit Characteristics, City and County of San Luis Obispo

<table>
<thead>
<tr>
<th></th>
<th>Population</th>
<th>Dwelling Units</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>2010</td>
<td>2035</td>
</tr>
<tr>
<td>County of San Luis Obispo</td>
<td>269,637252,631</td>
<td>315,363315,363</td>
</tr>
<tr>
<td>City of San Luis Obispo</td>
<td>45,11945,119</td>
<td>49,39049,390</td>
</tr>
<tr>
<td>City Share of County-Wide Total</td>
<td>17%</td>
<td>16%</td>
</tr>
</tbody>
</table>

Note: 1,182 units are added to City projections and 17,006 are added to County projections to account for group quarters.
Sources: SLOCOG, 2011

Response to Comment A6-16
Thank you for this clarification. The reference on page 7-14 has been corrected as follows in the Final EIR:

Response to Comment A6-17
The commenter provides general support for the proposed LUCE Update improvement project as it relates to the Santa Rosa/US 101 interchange described in Appendix N. The commenter cites concerns regarding scope of the City’s operational analysis (need to analyze additional intersections), the operational implications of consolidating traffic on Santa Rosa, the need to reconstruct the bridge structure to meet height standards, ROW impacts and the ultimate cost of the improvement. The proposed LUCE Update improvement to the Santa Rosa/US 101 interchange is consistent with the
Highway 1 Major Investment Study. This LUCE Update improvement is also consistent with SLOCOG’s US 101 Mobility Master Plan Task Force recommendations – including its improvement cost estimates (study is currently in draft form). Given that this is a programmatic DEIR, more detailed engineering based operational and cost estimates and alternative interchange configuration alternatives will be determined as part of this improvement’s project development and environmental review process (See Master Response #1). The purpose of the LUCE Update Sensitivity Analysis (Appendix N) was to gauge the operational feasibility of closing the Broad Street ramps and consolidating this ramp activity at a Santa Rosa interchange. Although the redistribution of traffic is significant, the analysis indicates that the improvement concept has merit and should be advanced for further consideration. The potential operational, ROW and cost concerns have been noted and will be provided to the Planning Commission and City Council for consideration in the decision making process.

Response to Comment A6-18
The commenter requests more detailed environmental review of the proposed modification of the currently planned US 101/Prado Road interchange. Analysis of traffic conditions with an overpass only versus a full interchange are provided in Appendix N, also see Response A6-16, Draft EIR section 6.1, and Master Response #1. The analysis found that modifying the planned Prado/101 interchange to be an overpass only would reduce traffic on Prado between Higuera and US 101, however, it results in increased traffic to the Los Osos Valley Road and US 101 interchange, the Madonna and US 101 interchange, and the Marsh and US 101 interchange and would likely require upgrades to those interchanges. The redistribution also increases traffic volumes and congestion levels on Higuera, Madonna, and Los Osos Valley Road corridors beyond acceptable thresholds, and therefore, it was found that changes to the current Circulation Element relating to the Prado Road interchange are not prudent at this time. More detailed specific traffic analysis of Prado and the US 101 corridor in this vicinity will be conducted as part of adjacent development. . . .

Response to Comment A6-19
Proposed Circulation Element Section 12.0 Rail Transportation includes existing general plan policies regarding passenger rail service for San Luis Obispo. The proposed Circulation Element would not make any changes to the existing policies. The extent of any increase in rail service that may occur in the future is uncertain and possible future modifications to the train station that may be needed in response to a future increase in train service have not been specified. Therefore, an evaluation of possible future modifications to the train station would be speculative at this time and is not required as part of the programmatic EIR prepared for the proposed LUCE Update. In regards to parking supply, the City is initiating a detailed parking study of Railroad Square outside of the EIR to address parking issues.

Please refer to Master Response #2 Programmatic Nature of the EIR for additional information regarding the programmatic nature of the LUCE Update EIR.

Response to Comment A6-20
The Commenter requests discussion regarding the recent acquisition of land by the San Luis Obispo Regional Transit Authority at the Sunset Drive-In Site. Purchase of the property does not constitute a land use decision. Only proposed projects that would warrant detailed discussion are part of this document. Section 8.3.3.8 of the Land Use Element does discuss Transit Authority use as follows: “Property within the area may need to be designed to accommodate the Homeless Services and/or transportation agency use.”

Please refer to Master Response #2, Programmatic Nature of the Draft EIR.

Response to Comment A6-21
The commenter indicates the City requested SLOCOG funds for the Orcutt Road Overpass be redirecting to improving the at-grade RR crossing in this location and hence it was removed from the upcoming Regional Transportation Plan update (currently under development). The commenter notes this decision should be documented in the EIR. The Orcutt Road Overpass was originally intended to address the volume of train traffic conflicting with vehicle traffic flow. Since the project was approved, train traffic has changed such that an overpass is not needed at the present time. However, the EIR found that those conditions that previously justified the project are outside the City’s control and could resume. Therefore it is prudent to continue to plan for and reserve right of way for this potential improvement. At this time, the
city is not requesting the project be included in the RTP, however, depending on future changes in train traffic, the City will consider making such a request as part of future updates.

Response to Comment A6-22
This comment provides suggestions for the revision of or edits to the proposed LUCE Update as it relates to mapping. Figure 2 of the Draft Land Use Element will be updated as follows:

- Source of map/data notes to read "City of San Luis Obispo"
- Labelling schema will be reviewed to address legibility
- Portions of Madonna Road, South Street, and Broad Street will be declassified as "state highway" and reclassified as "major roads"

Response to Comment A6-23
The City appreciates SLOCOG’s support related to the proposed goals of the LUCE Update. The comment will be provided to the Planning Commission and City Council for consideration in the decision-making process.

Please also refer to Master Response #1 Comments Specific to the LUCE Update Concepts and/or Policies related to CEQA requirements to respond to comments that support the proposed Project.

Response to Comment A6-24
The City appreciates SLOCOG’s support related to the proposed goals of the LUCE Update. The comment will be provided to the Planning Commission and City Council for consideration in the decision-making process.

Please also refer to Master Response #1 Comments Specific to the LUCE Update Concepts and/or Policies related to CEQA requirements to respond to comments that support the proposed Project.

Response to Comment A6-25
The City appreciates SLOCOG’s support related to regional coordination. The comment will be provided to the Planning Commission and City Council for consideration in the decision-making process.

Please also refer to Master Response #1 Comments Specific to the LUCE Update Concepts and/or Policies related to CEQA requirements to respond to comments that support the proposed Project.

Response to Comment A6-26
The commenter provides suggestions for the revision of or edits to the proposed LUCE Update as it relates to elderly individuals and individuals with disabilities. Policy 3.0.3 has been updated as follows to incorporate these suggestions from the commenter:

Policy 3.0.3: Paratransit: The City shall continue to support paratransit service for the elderly and handicapped should continue to be provided to seniors and persons with disabilities by public and private organizations.

Although the information provided by this comment does not pertain to the adequacy of the environmental impact analysis provided by the Draft EIR, the comment has been noted in Appendix of the Final EIR and will be provided to the Planning Commission and City Council for consideration in the decision making process. Please also refer to Master Response #1, Comments Specific to the LUCE Update Concepts and/or Policies.

Response to Comment A6-27
The commenter supports the City’s effort to monitor performance of its transportation network. This support is appreciated and will be provided to the Planning Commission and City Council for consideration in the decision making process.

Response to Comment A6-28
The language of Circulation Element Policy 15.0.5, Scenic Highways does not indicate that SLOCOG is working on the US 101 Aesthetics Study. No change to the policy language is required.
Response to Comment A6-29
The City appreciates SLOCOG’s support related to future project funding. The comment will be provided to the Planning Commission and City Council for consideration in the decision-making process. Please also refer to Master Response # 1 Comments Specific to the LUCE Update Concepts and/or Policies related to CEQA requirements to respond to comments that support the proposed Project.
July 28, 2014

Kim Murry, Deputy Director
Community Development Department
City of San Luis Obispo
919 Palm Street
San Luis Obispo CA 93401

COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT (EIR) FOR THE CITY OF SAN LUIS OBISPO LAND USE & CIRCULATION ELEMENT UPDATE

Dear Ms. Murry:

The California Department of Transportation (Caltrans) appreciates the opportunity to comment on the city’s Draft EIR for the Land Use & Circulation Element (LUCE) Update to the General Plan. Caltrans strives for an integrated multimodal transportation system that achieves interregional, regional, and local transportation needs. The city’s Circulation and Land Use Elements are important parts of California’s transportation planning tools since US 101, State Routes 1 and 227 are integral facilities in meeting the transportation needs of the State, the residents of San Luis Obispo and its surrounding communities. The LUCE plays a critical role in the viability of the State Highway System and it is critically important that future demand on the State Highway System caused by local development is avoided or mitigated.

Caltrans offers the following comments on the Draft EIR:

1) Caltrans submitted a comment letter dated January 10, 2014 (see attachment) on the EIR Notice of Preparation but the letter and responses could not be found in the Draft EIR. Please include the letter and responses in subsequent editions of the EIR.

2) Caltrans provided written guidance dated June 16, 2014 (see attachment) to the city regarding potential modifications at the Prado Road/US 101 intersection. Myriad challenges exist for improvements at this location, including but not limited to interchange spacing. All proposed features and standards must be considered together and will be equally important to ensure that a safe and effective design will result.

3) The EIR must address the comments provided in the letter attached dated July 18, 2014 (see attachment), from Caltrans Division of Aeronautics. This letter addresses airport-related noise, safety and other and regional aviation/land use planning issues.

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California’s economy and livability."
4) It is important that the city plan for a parallel and local route network to handle the traffic created by development impacts in the LUCE. Significant traffic impacts to US 101 from local development must be mitigated.

5) AB 1358, the California Complete Streets Act, requires cities to include policies on a multimodal transportation network in the update of the circulation element. The Governor’s Office of Planning and Research has published, Update to the General Plan Guidelines: Complete Streets and the Circulation Element (December 2010) which may be of assistance in complying with the Act.

6) The EIR should reference and incorporate the findings and recommendations of US 101 Corridor Mobility Study. The San Luis Obispo Council of Governments (SLOCOG) is leading this planning effort in partnership with Caltrans and local agencies. The draft document is scheduled for public release in August 2014.

7) The EIR and LUCE should reference the Caltrans Transportation Concept Reports (TCR) for US 101, State Route 1, and State Route 227. The TCUs are important planning documents and the EIR and LUCE should strive for consistency with them. The US 101 TCR is undergoing an update. Key corridor issues and recommendations from the draft include Intelligent Transportation Systems, Transportation System Management, Transportation Demand Management, operational improvements, access management, and multimodal travel options (Chapter 6, pages 99-101). The document can be downloaded from the following FTP site: ftp://d05ftp5:getquads@svetftp.dot.ca.gov

8) Caltrans supports the city’s efforts to improve transportation for all road users, including bicycle and pedestrian modes. Although US 101 is prohibited to bicycle and pedestrian access within the city limits, Caltrans supports continued efforts to improve alternative routes through the city and on State Route 1 (Santa Rosa Street).

9) Thank you for mentioning the Department’s Intersection Control Evaluation process, which includes roundabouts as part of a strategy of planning traffic intersection control.

10) Pages ES-2, ES-5, 2-22, and elsewhere
These pages describe city plans for development of the current Caltrans district office site and conversion to mixed use for tourist commercial, office and some residential uses. These pages also describe plans for realigning Madonna Road to Bridge Street. Caltrans recognizes the city’s long term vision for the Caltrans district office site. However, neither funding nor a process for relocation of the Caltrans offices has been identified.

"Caltrans improves mobility across California"
11) Pages ES-11, 4-346, and 4-347
Impact CIR-3 identifies an increase in traffic on freeway facilities and that the impact is considered to be Class 1, significant and unavoidable. Caltrans disagrees that the impact is unavoidable. If implementation of the LUCE will create a significant impact to the State Highway System, the city has an obligation to mitigate. The EIR must identify a strategy to mitigate the impact on US 101. The EIR should discuss among other strategies, the improvement or creation of parallel routes and an enhanced local network to handle locally generated traffic and divert it from US 101.

12) Page 4-8 and elsewhere
These pages describe the Ranch Property owned by Caltrans. Previous conversations with the city indicated that the future Caltrans development of this site would be compatible with the development that has occurred on neighboring properties. The Octagon Barn improvement project includes a landscaped buffer that provides visual screening, and Caltrans has agreed to provide land for it at no cost to the Land Conservancy. No other evidence has been provided suggesting Caltrans development of the site would be incompatible with existing development, block views or impair scenic qualities of the area.

13) Both of the above listed properties are described in the Draft EIR as the “Caltrans site.” In order to avoid confusion between these two Caltrans properties (or other Caltrans properties within the city limits), it would be helpful to give the sites different names.

14) Page 1-6
The reference to State Route 226 is incorrect. Please revise to “State Route 227.” Please also add US 101 to the list of state highways within the city’s geographic limits and influence.

15) Page 4-321, 4-326
State Route 1 is a conventional highway. Please add “conventional highway” to the list of functional roadway classifications and change the references on these pages from “arterial” to “conventional highway.”

16) Page 4-329
This page states that Caltrans does not own or operate “any nearby roads.” The text should be revised to include US 101, State Route 1, and State Route 227. All of these state owned facilities provide access through or to the city and are integral to the city’s circulation system.

17) Pages 4-331 and 4-332
These pages describes the city’s traffic impact significance thresholds and the goal of LOS D for streets outside of the downtown area. The EIR and the LUCE should note that the LOS threshold for impacts to the State Highway System is different, which is the cusp of

"Caltrans improves mobility across California"
Ms. Murry
Page 4

LOS C and D. Impacts to the State Highway System must be determined using Caltrans LOS thresholds of significance, not the city’s.

If you have any questions or concerns, please feel free to contact me at (805) 549-3131 or adam.fukushima@dot.ca.gov.

Sincerely,

[Signature]

Adam Fukushima, PTP
Development Review
Caltrans District 5

**Attachment 1**: Letter from Caltrans District 5 on the NOP, dated January 10, 2014

**Attachment 2**: Letter from Caltrans Division of Aeronautics, dated July 18, 2014

**Attachment 3**: Letter from Caltrans District 5 on the San Luis Ranch development, dated June 16, 2014

"Caltrans improves mobility across California"
January 10, 2014

Kim Murry, Deputy Director
Community Development Department
City of San Luis Obispo
919 Palm Street
San Luis Obispo CA 93401

Dear Ms. Murry:

COMMENTS ON THE NOTICE OF PREPARATION (NOP) OF A PROGRAMMATIC ENVIRONMENTAL IMPACT REPORT (EIR) OF THE GENERAL PLAN LAND USE AND CIRCULATION ELEMENTS (LUCE) UPDATE

The California Department of Transportation (Caltrans) appreciates the opportunity to comment on the NOP in anticipation of the City’s EIR for the General Plan Land Use and Circulation Elements Update. Caltrans strives for an integrated multimodal transportation system that achieves interregional, regional, and local transportation needs. The City’s Circulation and Land Use Elements are important parts of California’s transportation planning tools. State Route 1 and US 101 play an integral role in meeting the transportation needs of the residents of San Luis Obispo and its surrounding communities and it is our hope that the LUCE acknowledges the importance of these two routes for the community.

Caltrans offers the following comments for your consideration:

1) The LUCE should strive for consistency with the US 101 Corridor Mobility Study. The San Luis Obispo Council of Governments (SLOCOG) is leading this planning effort under a Partnership Planning grant from Caltrans. Currently in development, the document should be complete by summer of 2013.

2) Caltrans would like to request an analysis of US 101 including a weaving and ramp analysis. Considering the close proximity of many of the on- and off-ramps to US 101 in San Luis Obispo, Caltrans is willing to explore consolidating the ramps to better improve safety and operations.

3) If recommendations are made regarding an interchange on US 101 at Prado Road, an overcrossing without ramps should also be considered as an alternative.

4) Caltrans supports the City’s efforts to improve transportation for all road users, including bicycle and pedestrian modes. Although US 101 is prohibited to bicycle and pedestrian access, Caltrans supports continued efforts to improve alternative routes through the City and on State Route 1.

“Caltrans improves mobility across California”
5) The LUCE should analyze safety zones around and in the flight path of the airport to adequately address its use while also addressing safety issues. Caltrans Division of Aeronautics should be consulted.

6) Caltrans' standard for analyzing the traffic impacts of development are based on the Highway Capacity Manual methodology which measures the impact on all transportation modes (i.e. motor vehicle, bicycle, pedestrian). It may be helpful if the LUCE addressed this standard of methodology and its role in the CEQA level analysis of development projects.

7) The Caltrans Transportation Concept Report identifies the future planning concept of US 101 as a six lane facility. Any City development along US 101 that would preclude a six lane facility would constitute an inconsistency with the planning concept.

8) As part of the Department’s Intersection Control Evaluation process, Caltrans is willing to consider any proposed roundabouts as part of a strategy of planning traffic intersection control.

9) The City may want to consider additional parallel routes as a part of a strategy to relieve congestion on US 101.

If you have any questions or concerns, please feel free to contact me at (805) 549-3131 or adam.fukushima@dot.ca.gov.

Sincerely,

[Signature]

Adam Fukushima, PTP
Development Review
Caltrans District 5

"Caltrans improves mobility across California"
July 18, 2014

Ms. Kim Murry
City of San Luis Obispo
919 Palm Street
San Luis Obispo, CA 93401

Dear Ms. Murry:

Re: Draft Environmental Impact Report for the City of San Luis Obispo General Plan Land Use and Circulation Elements Update; SCH Number: 2013121019

The California Department of Transportation (Caltrans), Division of Aeronautics (Division), reviewed the above-referenced document with respect to airport-related noise and safety impacts and regional aviation land use planning issues pursuant to the California Environmental Quality Act (CEQA). The Division has technical expertise in the areas of airport operations safety and airport land use compatibility. We are a funding agency for airport projects and we have permit authority for public-use and special-use airports and heliports. The following comments are offered for your consideration.

The proposed project is for an update to the City of San Luis Obispo (City) General Plan Land Use and Circulation Elements (LUCE).

In accordance with California Public Utilities Code (PUC) Section 21676 et seq., prior to the amendment of a general plan or specific plan, or the adoption or approval of a zoning ordinance or building regulation within the planning boundary established by the airport land use commission (ALUC), the local agency shall first refer the proposed action to the ALUC.

If the ALUC determines that the proposed action is inconsistent with the airport land use compatibility plan, the referring agency shall be notified. The local agency may, after a public hearing, propose to overrule the ALUC by a two-thirds vote of its governing body after it makes specific findings. At least 45 days prior to the decision to overrule the ALUC, the local agency’s governing body shall provide to the ALUC and the Division a copy of the proposed decision and findings. The Division reviews and comments on the specific findings a local government intends to use when proposing to overrule an ALUC. The Division specifically looks at the proposed findings to gauge their relationship to the overrule. Also, pursuant to the PUC 21670 et seq., findings should show evidence that the local agency is minimizing “…the public’s exposure to excessive noise and safety hazards within areas around public airports to the extent that these areas are not already devoted to incompatible uses.”

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California’s economy and livability"
Ms. Kim Murry  
July 18, 2014  
Page 2

General Plan and Airport Land Use Compatibility Plan Consistency
California Government Code Section 65302.3(a)(b) requires each local agency having jurisdiction over land uses within the ALUC’s planning area to modify its general plan and any affected specific plans to be consistent with the ALUC’s airport land use compatibility plan (ALUCP). A general plan doesn’t need to be identical to the ALUCP to be considered consistent, however, general plans and elements must clearly demonstrate intent to adhere to ALUC policies to ensure compliance with compatibility criteria. Direct conflicts between mapped land use designations in a general plan and the ALUC criteria must be eliminated. A general plan needs to include (at the very least) policies committing the local agency to adopt compatibility criteria essential to ensuring that such conflicts will be avoided.

The general plan also must acknowledge that until ALUC compatibility criteria are incorporated into the general plan, individual development projects within the airport influence area must be submitted to the ALUC for review. These provisions must be included in the general plan at a minimum for it to be considered consistent with the ALUCP.

The Draft Environmental Impact Report (DEIR) for the LUCE update does not indicate that the City will comply with Government Code Section 65302.3(a)(b) with regard to general plan and ALUCP consistency. With the LUCE updates, Caltrans’ interpretation is that the City proposes to create their own new policies and programs for airport land use, noise and safety hazards instead of making the updates consistent with the adopted ALUCP, as required. Therefore, prior to the certification of this project DEIR, the City must overrule the ALUC if it decides the new land use and circulation element policies and programs are inconsistent with the ALUCP, as required by Government Code Section 65302.3(c). Caltrans also believes that if the City has no intention to comply with this section of the Government Code then it must be included in the range of reasonable alternatives to the project where its comparative merits can be evaluated. General Plan and ALUCP consistency is a feasible alternative that would go a long way towards honoring the public’s expectation that local agencies are protecting them from new noise and safety impacts in the vicinity of airports.

Even if the time and expense of an overrule is pursued by the City, the proposed airport programs and policies in the LUCE are so comprehensive that they have the net effect of amending the ALUCP and its policies, circumventing the ALUC’s project review process, and nearly establishing a separate airport land use commission that would replace the County’s. State law does not support such a wholesale transfer of airport land use compatibility planning to any another entity. State law specifically authorizes the establishment of ALUCs in a manner consistent with the law, and authorizes only them to formulate and adopt ALUCPs.

California ALUC law recognizes that countywide land use planning near airports is regionally important and that ALUCs exist in order to balance competing local interests. The law can also prevent local economic interests from outweighing the broader statewide interest in maintaining public airports. Land uses that encroach on airports markedly increases the possibility of new noise and safety problems that can lead to political pressure to restrict or even close the facilities.

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California’s economy and livability"
Mitigation Measures for Impact LU-2; Impact N-4; and Impact HAZ-2
The LUCE update mitigation measures for land use compatibility (LU-2); airport noise exposure (N-4); and hazards (HAZ-2), state that implementation of the general plan’s new airport area policies and programs will reduce these impacts to less than significant. These mitigation measures cannot be implemented by the City for purposes of reducing impacts to less than significant because here again, there has been no overrule of the ALUCP completed by the City. These impacts should still be considered significant environmental effects of the project. The DEIR does not adequately analyze the significant effects the project might cause by bringing future development and people into the airport planning area.

Handbook
Public Resources Code 21096, requires the California Airport Land Use Planning Handbook (Handbook) be utilized as a resource in the preparation of environmental documents for projects within airport land use compatibility plan boundaries or if such a plan has not been adopted, within two nautical miles of an airport. The Handbook provides a “General Plan Consistency Checklist” in Table 5A and a “Possible Airport Combining Zone Components” in Table 5B. The Handbook is a resource that should be applied to all public use airports and is available on-line at:

Structural Hazards near Airports
PUC Section 21659 prohibits structural hazards near airports. The planned height of buildings, antennas, and other objects should be checked with respect to Federal Aviation Regulation (FAR) Part 77 criteria if development is close to the airport, particularly if situated within the runway approach corridors. General plans must include policies restricting the heights of structures to protect airport airspace. To ensure compliance with FAR Part 77 “Objects Affecting Navigable Airspace” submission of a Notice of Proposed Construction or Alteration (Form 7460-1) to the Federal Aviation Administration (FAA) may be required. Form 7460-1 is available on-line at https://oeaaa.faa.gov/oeaaa/external/portal.jsp and should be submitted electronically.

PUC Section 21688 states that “no payments shall be made from the Aeronautics Account for expenditure on any airport or for the acquisition or development of any airport, if the department determines that the height restrictions around the airport are inadequate to provide reasonable assurance that the landing and taking off of aircraft at the airport will be conducted without obstruction or will be otherwise free from hazards.” The airport-owner must have sufficient control over obstructions in the airspace in the vicinity of the airport to assure that height restrictions can be maintained. This control may be in the form of ownership of any land from which obstructions may rise, air navigation (aviation) easements to guarantee maintenance of restrictions, or height limitation or land use zoning which will prohibit obstructions which would violate the obstruction standards.

The protection of airports from incompatible land use encroachment is vital to California’s economic future. San Luis Obispo Airport is an economic asset that should be protected through effective airport land use compatibility planning and awareness. Although the need for

“Provide a safe, sustainable, integrated and efficient transportation system
 to enhance California’s economy and livability”
Ms. Kim Murry  
July 18, 2014  
Page 4

compatible and safe land uses near airports is both a local and State issue, airport land use commissions and airport land use compatibility plans are key to protecting an airport and the people residing and working in the vicinity of an airport. Consideration given to the issue of compatible land uses in the vicinity of an airport should help to relieve future conflicts between airports and their neighbors.

These comments reflect the areas of concern to the Division with respect to airport-related noise, safety, and regional land use planning issues. We advise you to contact our District 5 office concerning surface transportation issues.

Thank you for the opportunity to review and comment on this proposal. If you have any questions, please contact me at (916) 654-6223, or by email at philip_crimmins@dot.ca.gov.

Sincerely,

Original Signed by

PHILIP CRIMMINS  
Aviation Environmental Specialist

c: State Clearinghouse, San Luis Obispo County ALUC, San Luis Obispo Airport  
bc: Terri Pencovic-DOTP, Alan Fukushima District 5 Planning

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"
June 16, 2014

Mr. Timothy Bochum
Deputy Director of Public Works
City of San Luis Obispo
919 Palm Street
San Luis Obispo, CA 93401

SAN LUIS RANCH DEVELOPMENT

Dear Mr. Bochum:

In anticipation of the San Luis Ranch development proposal, for which the city is beginning to consider, this letter is provided for early guidance on traffic circulation and infrastructure needs related to the state highway system. We recognize the importance of this project to the city and offer this in a spirit of partnership and in support of mutual goals for a safe and efficient transportation system.

The San Luis Ranch project is located on the former Dalidio property adjacent and west of US 101, between the Madonna Road and Los Osos Valley Road interchanges. Although some information developed for the former San Luis Marketplace project may still be relevant, many factors and circumstances have changed over the decades of time since passed. As we discussed at a February 27, 2014 meeting together with staff from the San Luis Obispo Council of Governments and the Regional Transit Authority, the city should not regard past decisions or any implied commitments related to US 101 as foregone conclusions, including but not limited to constructing a new interchange at Prado Road.

Central to this discussion is access to US 101. For traveler safety and operational integrity of the freeway, a new interchange in an urban location such as this must be no closer than one mile to the next interchange. Because the Madonna Road and Los Osos Valley Road interchanges are less than two-miles apart now, this requirement cannot be met for a new Prado Road interchange. Recognizing the city's stated desire to pursue new access as an option, however, it is critical for the city to establish a clear purpose and need for any new proposal. In support of that pursuit, we offer these suggestions:

- Conduct a thorough subarea traffic analysis of the circulation across, along and including the US 101 corridor between Los Osos Valley Road and Madonna Road.

- Evaluate a full range of options to mitigate the traffic impacts of the new development in a progressive sequence, to include: (1) making local circulation improvements only, (2) establishing new local access only across US 101, without connections, eliminating the existing northbound ramps, (3) modifying access at the two existing full access

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and viability"
interchanges, and (4) establishing a new connection with a full or partial access interchange at Prado Road.

Should the analysis support new access at this location, the city should also anticipate the potential for numerous exceptions to design standards for a project on the State Highway system. While interchange spacing will be among the more critical factors to address, a variety of other features and standards must be considered together and will be equally important to ensure that a safe and effective product design will result.

In addition, other features unique to the project site will require careful consideration:

- **Floodplain** - The drainage characteristics of the project location are well documented. The addition of impervious surface to the ranch property has significant implications for San Luis Creek and US 101. A revised flood plain map may be required by FEMA. Caltrans cannot approve any improvements or modifications to State Highway facilities until FEMA requirements are satisfied. In addition to coordinating with Caltrans’ experts and FEMA, we suggest the city also coordinate with San Luis Obispo County and other agencies when approaching this subject. For more detailed information regarding hydrology and flooding with respect to the State Highway please contact Mr. Ben Erchul of the District Hydraulics Department at (805) 549-3391.

- **Aviation safety and Airport Impacts** - The San Luis Ranch property is proximal to take-off and landing approaches for all runways at the San Luis Obispo County Regional Airport. Locating new residential and commercial development within and around these flight paths raises questions regarding airport operations and safety. We suggest that the city consult directly with the Caltrans Division of Aeronautics prior to issuing an RFP. Please contact Mr. Terry Barrie, Caltrans Division of Aeronautics, at (916) 654-4151 to initiate a dialog on this topic.

In conclusion, Caltrans values our partnership with the city of San Luis Obispo, and we look forward to participating in the upcoming scoping meeting regarding the development proposal. If you need to discuss these issues further with Caltrans please contact Mr. Larry Newland of my staff at (805) 549-3103.

Sincerely,

[Signature]

Aileen K. Loe
Deputy District Director
Planning and Local Assistance

*Provide a safe, sustainable, integrated and efficient transportation system to enhance California’s economy and livability*
Response to Comment A7-1

The Caltrans letter was reviewed by the City and a response to the NOP comment letter was provided to CalTrans staff and can be found in Section 3.0, Minor Edits to the Draft Program EIR.

Response to Comment A7-2

The commenter states that Caltrans sent the City a letter dated June 16, 2014, regarding potential modifications at the US 101/Prado Road interchange. The City received the letter and is aware of Caltrans’ requirements for freeway interchanges and access. The EIR evaluated the effects of modifying the plans for the Prado Rd. interchange to only an overpass at a programmatic level and found that both regional and local traffic diversion would result in increased traffic at the Los Osos Valley Road and US 101 interchange, the Madonna and US 101 interchange, and the Marsh and US 101 interchange and would likely require upgrades to those interchanges. The redistribution also increases traffic volumes and congestion levels on Higuera, Madonna, and Los Osos Valley Road corridors beyond acceptable thresholds, and therefore, it was found that changes to the current circulation element relating to the Prado Rd. Interchange are not prudent from a programmatic level at this time.

The City is mutually interested in ensuring a safe and efficient design by considering all proposed features and standards. Project specific traffic analysis will be conducted as part of development of adjacent properties or separate Caltrans Project Study Report which will include a detailed operational analysis of this interchange and the 101 corridor in the vicinity.

Response to Comment A7-3

Please see Response to Comments section A5.

Response to Comment A7-4

The commenter states that US 101 may be impacted by future development in the city and that parallel alternative routes should be available on the local network. The LUCE Update includes goals, policies and programs to address impacts related to accommodating increased volumes on local roadways and providing a safe and effective local street network. Refer to the policy discussion under Impact CIR-1 of the Draft EIR (pages 4-341 through 4-344) for the full text of the policies.

In developing the LUCE and the circulation options included, extensive policy support is provided for reduction of traffic impacts to State facilities associated with local development. This includes enhancement of residential opportunities in the community, extensive support for alternative transportation modes to avoid auto trips on the US 101, and working with the State to enhance the interface between local roadways and US 101.

Response to Comment A7-5

The commenter identifies *Update to the General Plan Guidelines: Complete Streets and the Circulation Element* as a resource for complying with AB 1358, the California Complete Streets Act. The following three proposed General Plan policies position the City to comply with AB 1358:

- Proposed Policy 6.0.A (Complete Streets) states that the City will design and operate streets to enable safe, comfortable, and convenient access and travel for all users.
- Proposed Policy 6.0.B (Multimodal Level of Service Objectives, Service Standards, & Significant Criteria) provides operation standards that the City will strive to achieve and maintain for vehicle, pedestrian, bicycle, and transit modes of travel.
- Proposed Policy 6.0.C (Multimodal Priorities) indicates that multimodal service levels should be prioritized in accordance with the established modal priorities.
Response to Comment A7-6
The commenter mentions the US 101 Corridor Mobility Study, which SLOCOG currently is preparing to present to its board. Because this corridor planning effort is in progress, it would be premature to incorporate the preliminary findings and proposed recommendations into the EIR for the General Plan Update. However, once adopted, the City will consider amendment into the Circulation Element to make the documents consistent.

Response to Comment A7-7
The commenter requests that the EIR and LUCE reference the Transportation Concept Reports (TCR) for US 101, SR-1 and SR-227 and strive for consistency with these System Planning documents. These documents were reviewed during development of the LUCE and for those portions of US 101, SR-1 and SR-227 that are within the City’s jurisdictional boundaries, all the proposed LUCE Update improvement projects, policies and programs related to transportation are consistent with their respective TCRRs.

Response to Comment A7-8
The City appreciates Caltrans’ support related to improving transportation for all road users. The comment will be provided to the Planning Commission and City Council for consideration in the decision-making process. Please also refer to Master Response # 1, Comments Specific to the General Plan Update Concepts and/or Policies, related to CEQA requirements to respond to comments that support the proposed LUCE Update.

Response to Comment A7-9
The City appreciates Caltrans’ support related to the EIR’s use of the Department’s Intersection Control Evaluation process. The comment will be provided to the Planning Commission and City Council for consideration in the decision-making process. Please also refer to Master Response # 1 Comments Specific to the LUCE Update Concepts and/or Policies related to CEQA requirements to respond to comments that support the proposed Project.

Response to Comment A7-10
The City concurs that funding and a process for relocating the existing Caltrans offices must be identified prior to implementing development described for proposed development site “H” (Caltrans Site) and/or implementing proposed street network change No. 9 (Realign Madonna Road to Bridge Street instead of Higuera Street).

Response to Comment A7-11
The commenter refers to impact CIR-3 and states that Caltrans views the impact to the freeway facilities as mitigable. See the CIR-3 Mitigation Measures discussion on page 4-347 of the DEIR for explanation of the constraints surrounding mitigating freeway facility impacts. Cumulative impacts to the 101 corridor are due to a combination of local growth and regional growth outside the City’s control. Caltrans has identified expansion of Hwy 101 to a six lane facility, which would mitigate this impact, as part of its Transportation Concept Report. However subsequent regional planning efforts studying this expansion, such as the Highway 101 Mobility Study, are not yet complete and no funding mechanisms have been established. Therefore this is deemed a Class I impact. In response to this comment, the following discussion has been incorporated into the EIR on page 4-347 following the declaration that the impact is significant and unavoidable:

The City shall participate in and support regional multiagency efforts to mitigate congestion on Hwy 101 and associated regional funding initiatives where appropriate.

Localized projects that require discretionary approval and may substantially increase traffic on the US 101 corridor and/or ramps would be subject to project-specific environmental review consistent with the requirements of CEQA and City Policy 12.3.11, Environmental Review. If a proposed project were determined to have the potential to result in a significant impact, mitigation measures would be implemented to minimize the impact to the extent feasible.

The commenter also suggests that the EIR should discuss among other strategies, the improvement or creation of parallel routes and an enhanced local network to handle locally generated traffic and divert it from US 101. The Circulation Element includes numerous local improvements that enhance 101 corridor and redistribution of local traffic. These
include the Prado Road Interchange, Hwy 1/US 101 Interchange including potential ramp closures, parallel bicycle and pedestrian facilities and other parallel roadway routes.

Response to Comment A7-12
The CalTrans property along South Higuera Street has been identified in the LUCE Update as a Special Planning Area. The LUCE Update project Draft EIR includes an analysis of the Proposed Land Use Development Special Planning Areas which have been individually discussed throughout the EIR. Although the EIR stipulates that potential future development of these sites, including the CalTrans property, could potentially result in impacts (such as aesthetic compatibility), it is important to note that the EIR does not include the analysis of specific future development projects.

Please refer to Master Response #2, Programmatic Nature of the EIR.

Response to Comment A7-13
The commenter states that the phrase “Caltrans site” is used throughout the DEIR to refer to more than one site in the city. The phrase “Caltrans site” is used in the LUCE EIR to refer to one of the proposed development areas (Site H in Table 2.4-2).

Please refer to Section 3.0, Minor Edits to the Draft Program EIR, for corresponding edits.

Response to Comment A7-14
Thank you for this clarification. The reference on page 1-6 has been corrected as follows in the Final EIR:

The California Department of Transportation (Caltrans) has responsibility for approving future improvements to the state highway system, including Highway 1, US 101, and State Route 226227.

Response to Comment A7-15
The commenter states that Caltrans’ functional classification of State Route 1 is conventional highway. This is a State designation as opposed to a City designation. The City has an established functional classification naming paradigm, which does not include the conventional highway classification. Within the city limits, State Route 1 is classified as an arterial per the City’s functional classification paradigm.

Response to Comment A7-16
The commenter states that Caltrans owns or operates US 101, State Route 1 and State Route 227. The text on page 4-329 has been updated as follows:

Caltrans is responsible for planning, designing, constructing, and maintaining all state-owned and operated roadways in San Luis Obispo County, which in the case of this study does not include any nearby roads includes US 101, State Route 1 and State Route 227. Federal highway standards are implemented in California by Caltrans.

Response to Comment A7-17
The commenter states that Caltrans’ level of service (LOS) significance threshold for freeway facilities is LOS C, not LOS D. The LOS standard reported in the EIR has been edited to reflect the standard documented in Caltrans’ Guide for the Preparation of Traffic Impact Studies (December 2002). Please refer to Section 3.0, Minor Edits to the Draft Program EIR, for corresponding edits.
Date: July 28, 2014

To: Kim Murry, City of San Luis Obispo Community Development Department

From: San Luis Obispo County Airport Land Use Commission (ALUC)

Subject: Draft Environmental Impact Report for the City of San Luis Obispo General Plan Land Use and Circulation Elements Update and Draft Zoning Ordinance Amendment; SCH2013121019

The San Luis Obispo County Airport Land Use Commission (ALUC) reviewed the above-referenced documents with respect to airport-related noise and safety impacts and regional airport land use planning issues pursuant to the California Environmental Quality Act (CEQA). The ALUC has technical expertise in the areas of airport operations safety and airport land use compatibility. The ALUC has review authority over plans, regulations, and other actions of local agencies and airport operators pursuant to Section 21676 of the California Public Utilities Code, including:

a. General plans and general plan amendments
b. Specific plans and general plan amendments
c. Zoning ordinances and amendments to zoning ordinances
d. Building codes and modifications of building codes

The ALUC is responsible for determining the compatibility or incompatibility of such plans, regulations, or actions with the adopted Airport Land Use Plans. The following comments are offered for your consideration.

In accordance with California Public Utilities Code (PUC) Section 21676 et seq., the City of San Luis Obispo on June 13, 2014 referred the proposed project for an update to the City of San Luis Obispo (City) General Plan Land Use and Circulation Elements (LUCE) and the Draft Zoning Ordinance Amendment to the ALUC for a determination of consistency or inconsistency with the adopted Airport Land Use Plan for the San Luis Obispo County Regional Airport (ALUP).

The ALUC determined on July 16, 2014, that the proposed project was inconsistent with the adopted ALUP. The notice of ALUC action, including the findings for the inconsistency
determination, is enclosed.

**General Plan, Zoning Ordinance and Airport Land Use Plan Inconsistency**

California Government Code Section 65302.3 (a) (b) requires each local agency having jurisdiction over land uses within the ALUC's planning area to modify its general plan or zoning ordinance and any affected specific plans to be consistent with the ALUP. The proposed general plan and elements update, and zoning ordinance amendment do not demonstrate intent to adhere to ALUP polices or to ensure compliance with the ALUP. The proposed general plan and elements update, and zoning ordinance amendment need to include policies committing the City to adopt compatibility criteria that demonstrate compliance with the ALUP.

**Alternatives**

The DEIR is inadequate, because a range of reasonable alternatives was not considered. Consideration of an alternative project that demonstrated consistency with the ALUP was should be evaluated.

**Land Use, Noise and Hazards Impacts**

The DEIR is inadequate, because the mitigation measures identified for land use compatibility (LU-2); airport noise exposure (N-4); and hazards (HAZ-2), are based on the assumption that the implementation of the proposed zoning ordinance amendment will reduce those impacts to less than significant. Those measures cannot be implemented because they are in direct conflict with the ALUP and the City has not undergone the process to overrule the ALUC's determination of inconsistency. Therefore, those impacts should be considered significant. In addition, the potential impact(s) associated with the single noise event(s) from aircraft should be evaluated.

These comments express the ALUC's area of concerns with respect to airport-related noise, safety, and regional airport land use planning issues.

If you have any questions, please contact me at (805) 781-1172.

Respectfully,

Xzandrea Fowler, Airports Planner
Airport Land Use Commission

Enclosed: Notice of Airport Land Use Commission Action
NOTICE OF AIRPORT LAND USE COMMISSION ACTION

ALUC 2014-004

HEARING DATE: JULY 16, 2014

RECOMMENDATION TO: CITY OF SAN LUIS OBISPO
Derek Johnson, Community Development Director

SUBJECT: Hearing to consider a referral by the City of San Luis Obispo (City) for a determination of consistency or inconsistency regarding the proposed Land Use and Circulation Element (LUCE) Update of the City’s General Plan, resulting in changes to policies and programs within Chapter 7 (Airport Area); Land Use Designations for certain properties that are within the Airport Planning Area (as defined by the adopted Airport Land Use Plan); the creation of an Airport Overlay Zone; and a referral for a determination of consistency or inconsistency regarding the City’s Draft Zoning Ordinance Amendment implementing the proposed LUCE Update. The land area affected by the LUCE Update that is located within the adopted Airport Planning area, as shown in Figure 3 (page 18 of the LUCE Update referral). The proposed project is located in the San Luis Obispo County Regional Airport Land Use Plan - Airport Safety Areas S-1a, S-1b, S-1c, S-2 and the Runway Protection Zone.

On JULY 16, 2014, the Airport Land Use Commission determined the above referenced project inconsistent with the San Luis Obispo County Regional Airport Land Use Plan, and is referred back to the City of San Luis Obispo, Derek Johnson, Community Development Director, based on the Recommendations and Findings 1-17, in the Staff Report.

If you have any questions regarding this matter, please contact me at (805) 781-5708.

Sincerely,

Chris Macek, Secretary
Airport Land Use Commission

Cc: Michael Cady, Assistant City Manager
Enclosed: Staff report Recommendations and Findings
STAFF REPORT
SAN LUIS OBISPO COUNTY AIRPORT LAND USE COMMISSION

DATE: JULY 16, 2014

TO: AIRPORT LAND USE COMMISSION (ALUC)

FROM: BILL ROBESON, COUNTY PLANNING AND BUILDING
       XZANDREA FOWLER, COUNTY PLANNING AND BUILDING

REFERRING AGENCY: CITY OF SAN LUIS OBISPO
                     APPLICANT: CITY OF SAN LUIS OBISPO -
                     COMMUNITY DEVELOPMENT DEPARTMENT
                     CITY FILE NUMBER: N/A
                     PLANNER: DEREK JOHNSON, COMMUNITY DEVELOPMENT
                     DIRECTOR

SUBJECT: A REFERRAL BY THE CITY OF SAN LUIS OBISPO (CITY) FOR A DETERMINATION
         OF CONSISTENCY OR INCONSISTENCY REGARDING THE PROPOSED LAND USE
         AND CIRCULATION ELEMENT (LUCE) UPDATE OF THE CITY’S GENERAL PLAN,
         RESULTING IN CHANGES TO POLICIES AND PROGRAMS WITHIN CHAPTER 7
         (AIRPORT AREA); LAND USE DESIGNATIONS FOR CERTAIN PROPERTIES THAT
         ARE WITHIN THE AIRPORT PLANNING AREA (AS DEFINED BY THE ADOPTED
         AIRPORT LAND USE PLAN FOR THE SAN LUIS OBISPO COUNTY REGIONAL
         AIRPORT); THE CREATION OF AN AIRPORT OVERLAY ZONE; AND A REFERRAL
         FOR A DETERMINATION OF CONSISTENCY OR INCONSISTENCY REGARDING THE
         CITY’S DRAFT ZONING ORDINANCE AMENDMENT IMPLEMENTING THE
         PROPOSED LUCE UPDATE.

LOCATION: THE LAND AREA AFFECTED BY THE LUCE UPDATE IS LOCATED WITHIN THE
          ADOPTED AIRPORT LAND USE PLAN AREA, AS SHOWN IN FIGURE 3 (PAGE 18
          OF THE LUCE REFERRAL). THE PROPOSED PROJECT IS LOCATED IN THE SAN
          LUIS OBISPO COUNTY REGIONAL AIRPORT LAND USE PLAN - AIRPORT SAFETY
          AREAS S-1a, S-1b, S-1c, S-2 AND THE RUNWAY PROTECTION ZONE.

RECOMMENDATIONS:

Recommend a determination of inconsistency to the City of San Luis Obispo for proposed Land Use and
Circulation Element (LUCE) Update of the City’s General Plan Resulting in changes to policies and
programs within Chapter 7 (Airport Area); Land Use Designations for certain properties that are within the
Airport Planning Area (as defined by the adopted Airport Land Use Plan for the San Luis Obispo County
Regional Airport); and the creation of an Airport Overlay Zone.

Finding(s):

1. The Airport Land Use Commission finds that the City’s proposal to implement
   Land Use Element Update policies and programs through adoption of an Airport
   Overlay Zone in its zoning ordinance to address allowable uses and development
   standards for areas located within the Airport Planning Area is inconsistent with
   the land use policies outlined in the Airport Land Use Plan (ALUP) for the San
   Luis Obispo County Regional Airport.

2. The Airport Land Use Commission finds that the City’s proposed Airport Overlay
   Zone Airport Safety Zones are inconsistent with the existing ALUP Aviation Safety
   Areas, because the Airport Overlay Zone Airport Safety Zones proposed by the
City's draft LUCE would allow greater density of development in the airport planning area than permitted by the established ALUP Aviation Safety Areas.

3. The Airport Land Use Commission finds the City's proposed Airport Overlay Zone to be inconsistent with the purpose of the State Aeronautics Act to "minimize the public's exposure to excessive noise and safety hazards", as established by Public Utilities Code Section 21670 (a)(2).

4. The Airport Land Use Commission finds that the City's proposal to allow new residential land uses within the projected 60dB CNEL noise contour, as stated in the new policy in Chapter 7, is inconsistent with existing ALUP noise sensitive land use policies. The 60dB CNEL criterion proposed to be the maximum acceptable level of airport noise for residential and other noise-sensitive land uses is louder than the 55dB CNEL standard established by the adopted ALUP. The Airport Land Use Commission also finds this provision to be inconsistent with the purpose of the State Aeronautics Act to "minimize the public's exposure to excessive noise and safety hazards", as established by Public Utilities Code Section 21670 (a)(2).

5. The Airport Land Use Commission finds that the City's proposal to increase development within the established ALUP aviation safety areas, specifically those areas identified open space protection areas, as outlined in the City's Airport Compatibility Open Space Plan (ACOS), is inconsistent with the existing ALUP and the City's ACOS. The Airport Land Use Commission finds that the implementation of this proposal could facilitate development on existing open space that is subject to aviation noise impacts and/or safety hazards; and this provision is inconsistent with the purpose of the State Aeronautics Act to "minimize the public's exposure to excessive noise and safety hazards", as established by Public Utilities Code Section 21670 (a)(2).

6. The Airport Land Use Commission finds that the City's proposal to change the language within the existing Land Use and Circulation Element (LUCE), Section 7.2, that states "Development should be permitted only if it is consistent with the San Luis Obispo County Regional Airport Land Use Plan (ALUP)" to language as shown in the proposed new LUCE sections 7.14 and 7.15, that no longer require development to be consistent with the ALUP is inconsistent with existing ALUP policies. The City's proposal to exempt development from consistency with the Airport Land Use Plan is also contrary to the purpose of the State Aeronautics Act "to provide for the orderly development of each public use airport in this state and the area surrounding these airports", as established by Public Utilities Code Section 21670 (a)(1).

7. The Airport Land Use Commission finds that the City's proposal to modify the requirement to record an avigation easement or a real estate disclosure document is inconsistent with the existing ALUP policies regarding avigation easements and real estate disclosures.

8. The Airport Land Use Commission finds that the proposed development envisioned in the LUCE Update conflicts with the existing ALUP adopted by the Airport Land Use Commission, the agency with jurisdiction over the impacted project area. The Airport Land Use Commission finds that the draft proposed LUCE would expose greater numbers of people to airport-related noise and safety
hazards, and that this provision is also inconsistent with the purpose of the State Aeronautics Act to "minimize the public's exposure to excessive noise and safety hazards", as established by Public Utilities Code Section 21670 (a)(2).

9. The Airport Land Use Commission finds that the City's interpretation that adoption of the draft proposed LUCE, followed by an override of a determination of inconsistency made by the Airport Land Use Commission, will exempt all future adoptions, approvals, and amendments of general plans, specific plans, zoning ordinances, building regulations, and individual projects in the area within which the LUCE Update is applicable from further review by the Airport Land Use Commission, is incorrect. The Airport Land Use Commission finds that this anticipated course of action is inconsistent with the referral requirements established by Section 2.5.1.4 (page 4) and Section 7.1 (page 51) of the existing ALUP, and is contrary to the legislative intent of the State Aeronautics Act and inconsistent with the purposes of that legislation, as stated in Public Utilities Code Section 21670.

10. The Airport Land Use Commission finds that Chapter 17.57 of the draft proposed LUCE, together with the supporting Draft Airport Land Use Compatibility Report (as prepared by Johnson Aviation and dated November 22, 2013) could be used to avoid compliance with the established Airport Land Use Compatibility policies as outlined in the ALUP. The Airport Land Use Commission finds that neither the Constitution of the State of California nor any statute enacted by the State Legislature confers upon local cities the authority to enact such Airport Land Use Compatibility policies. On the contrary, Sections 21674 (c) and 21675 (a) of the California Public Utilities Code specifically invest the power to formulate, adopt, and amend Airport Land Use Compatibility Plans in duly constituted Airport Land Use Commissions. Additionally, the City Council of the City of San Luis Obispo has not been designated as "the agency that shall be responsible of [sic] the preparation, adoption, and amendment of each airport land use compatibility plan" by the board of supervisors of San Luis Obispo County and each affected city, as would be required by Sections 21670.1. (a) and 21670.1. (c)(2)(E) of the California Public Utilities Code. The Airport Land Use Commission, therefore, further finds that the adoption, by the City of San Luis Obispo, of Chapter 17.57 of the draft proposed LUCE and of the Draft Airport Land Use Compatibility Report would be contrary to the legislative intent of the State Aeronautics Act and inconsistent with the purposes of that legislation, as stated in Public Utilities Code Section 21670.

11. The Airport Land Use Commission finds that the adoption, by the City of San Luis Obispo, of Chapter 17.57 of the draft proposed LUCE and of the Draft Airport Land Use Compatibility Report would represent an intrusion into the office and franchise of the Airport Land Use Commission of San Luis Obispo County, in violation of Section 803 of the California Code of Civil Procedure.

Recommend a determination of inconsistency to the City of San Luis Obispo regarding the City's Draft Zoning Ordinance Amendment implementing the proposed LUCE Update.

Finding(s):

12. The Airport Land Use Commission finds that adoption of the City's Zoning Ordinance Amendment proposed for Chapter 17.22 (Use Regulation) and the draft new section Chapter 17.57 (Airport Overlay Zone) is inconsistent with the existing ALUP, because the proposal could present incompatibilities to the continued economic vitality and efficient operation of the Airport with respect to safety, noise, overflight or obstacle clearance by allowing incompatible and/or
sensitive receptor uses to be located in closer proximity and at higher densities
than are currently allowable under the ALUP.

13. The Airport Land Use Commission finds that the adoption of the City's proposed
draft Zoning Ordinance Amendment that implements the LUCE Update proposing
creation of an Airport Overlay Zone (AOZ) to be inconsistent with the ALUP,
because it does not provide a mechanism for referral review of proposed
development and/or land uses for determination of consistency/inconsistency with
the existing ALUP by the ALUC, the agency with jurisdiction over impacted project
area.

14. The Airport Land Use Commission finds that the adoption and implementation of
the City’s proposed Airport Overlay Zone Airport Safety Zones to be inconsistent
with the existing ALUP Aviation Safety Areas.

15. The Airport Land Use Commission finds that the adoption and implementation of
the City’s proposal to allow new residential land uses within the projected 60dB
CNEL noise contour, as stated in the new language in the Draft Zoning Code
Amendment Section 17.57.080, is inconsistent with existing ALUP noise sensitive
land use policies, because it increases the potential development of noise-
sensitive land uses in areas near the airport that are exposed to significant levels
of aircraft noise.

16. The Airport Land Use Commission finds that the adoption and implementation of
the City’s proposed language in the Draft Zoning Code Amendment Section
17.57.050 to increase development within the ALUP safety zones, specifically
those areas identified open space protection areas, as outlined in the City’s
Airport Compatibility Open Space Plan (ACOS), is inconsistent with the existing
ALUP and the City’s ACOS.

17. The Airport Land Use Commission finds that the adoption and implementation of
the City’s proposed language in the Draft Zoning Code Amendment Section
17.57.040 regarding permissible land uses, maximum land use density
(persons/acre), maximum residential density (dwelling units/acre), and minimum
usable open space specified are inconsistent with applicable ALUP policies,
because they allow uses, densities and minimum usable open space standards
that exceed or are prohibited under the existing ALUP.

Recommend review and provide written comments on the Draft Environmental Impact Report prepared for
the LUCE Update and Draft Zoning Ordinance Amendment project during the public review period (ends on
July 28, 2014).

The Draft Environmental Impact Report (DEIR) prepared for the LUCE Update and Draft Zoning Ordinance
Amendment identifies a Class I, significant and unavoidable impact because the adoption of the LUCE
Update policies and Zoning Ordinance Amendment would have the potential to conflict with the Airport Land
Use Plan adopted by the Airport Land Use Commission, the agency with jurisdiction over the proposed
project area, for the reasons stated above in the Findings for a determination of inconsistency. The DEIR
also acknowledges that the proposed LUCE Update and Draft Zoning Ordinance Amendment have the
potential to be found inconsistent with the existing Airport Land Use Plan by the Airport Land Use
Commission. The potential conflicts are primarily associated with the conflicts in policies that exist to avoid
or minimize potential safety and noise impacts associated with existing or future airport operations as
described in the adopted Airport Master Plan and incorporated into the Airport Land Use Plan by reference.

The Noise section of the DEIR should evaluate the potential impacts associated with single noise events,
since the LUCE Update and Draft Zoning Ordinance Amendment could result in an increase of noise-sensitive receptors within areas that are exposed to significant levels of aircraft noise.

PROJECT DESCRIPTION

Proposal: The LUCE Update Project provides proposed changes to the City’s existing Land Use Element and Circulation Elements of the City of San Luis Obispo General Plan. The intent is to establish and implement a refined set of goals, policies, and programs for regulating development in the city, guiding the land use decision-making process, balance population growth with infrastructure availability, and to provide a true multi-modal transportation system that will guide the community over the next 20 years.

The LUCE Update project primarily addresses infill opportunities, changes in legislation, and the need to update existing policy direction to reflect current values and requirements, the LUCE Update focuses on updated policy language and several areas of the City where “physical” land use changes are proposed. The proposed physical land use changes would apply only to specified areas that over the next 20 years may have the potential to accommodate changes in the land use type or intensity or are in need of circulation and infrastructure improvements. The LUCE Update proposes changes to existing policy and program language, and new policies and programs that specifically address inconsistencies between the proposed project and the Airport Land Use Plan for the San Luis Obispo County Regional Airport.

The physical changes proposed in the Land Use Element Update for the most part are limited to changes in land use type or intensity in specific areas. These changes include proposed mixed use redevelopment of some sites, the infill of underutilized locations, and four sites that will require modified or new specific plans to address development parameters such as the location and type of land uses, infrastructure needs, and designs to address environmental constraints. These four sites include: Potential modification of the Margarita Area Specific Plan to allow increased residential densities; and new specific plans for the San Luis Ranch (formerly known as the Dalidio site), the Madonna property at Los Osos Valley Road, and the Avila Ranch. The location of known development proposals are shown in Figure 1.

The policy and program updates proposed in the Airport Chapter of the Land Use Element reflect airport safety, noise, height and overflight considerations. Policies, programs, and Zoning Code implementation have been drafted to create an Airport Overlay Zone to codify airport compatibility criteria for areas subject to airport influence consistent with the requirements of California Public Utilities Code Section 21570, et.seq, the California Airport Land Use Planning Handbook, and other related federal and state requirements relating to airport land use compatibility planning. These include allowable uses and development standards such as density and intensity limitations, identification of prohibited uses, infill development, height limitations, and other hazards to flight, noise insulation, buyer awareness measures, airspace protection, nonconforming uses and reconstruction, and the process for airport compatibility criteria reviews by the City.

The Circulation Element Update describes how the City Plans to provide for the transportation of people and materials within San Luis Obispo with connections to other areas in San Luis Obispo County and beyond. The proposed Circulation Element provides policy language to address a variety of circulation-related issues, including: traffic reduction; transit; encouraging the use of bicycles and walking; traffic management; future street network changes; truck, air and rail transportation; parking management in commercial areas and residential neighborhoods; and scenic roadways.

Setting: Rural and Suburban areas of San Luis Obispo City/County

Existing Uses: Agriculture, Airport Property, Business Park, Commercial, Industrial/Manufacturing, Office, open Space, Public Facilities, Recreation, Residential, Rural Lands, Rural Residential, and Suburban Residential

Site Area: The area affected by the LUCE Update applies to all areas within the City and to some areas outside the City limits but within the City’s Sphere of Influence (such as the San Luis Ranch area and the
Airport Area Specific Plan properties that have yet to be annexed. A Map of the City’s planning area affected by the LUCE Update is shown in Figure 2A. In addition to the proposed changes to the General Plan designations for certain properties, the update includes proposed policy and program changes to

Chapter 7 (Airport Area) in the Land Use Element. A map of the proposed Airport Overlay Zone is shown in Figure 2. The land area affected by the LUCE Update located within the adopted Airport Land Use Plan area is shown in Figure 3.

DISCUSSION

Airport Safety Zones: The application of the proposed airport safety zones for the San Luis Obispo County Regional Airport are reflected in the proposed Airport Overlay Zone are shown in Figure 4. The existing Airport Land Use Plan aviation safety areas compared to the proposed Airport Overlay Zone, and Specific and Area Plan areas are shown in Figure 4A.

SAFETY ZONE COMPARISON - DENSITY LIMITATIONS TABLE

<table>
<thead>
<tr>
<th>CITY’S PROPOSAL: Handbook/ Airport Safety Zones</th>
<th>AIRPORT LAND USE PLAN: Aviation Safety Areas</th>
</tr>
</thead>
<tbody>
<tr>
<td>AO-1 Runway Protection Zone</td>
<td>Res= 0</td>
</tr>
<tr>
<td></td>
<td>Non-Res= 0</td>
</tr>
<tr>
<td></td>
<td>Ag, roads, &amp; parking may are allowable</td>
</tr>
<tr>
<td>AO-2 Inner Approach/Departure Zone</td>
<td>Res=0</td>
</tr>
<tr>
<td></td>
<td>Non-Res= 60-80 persons/acre</td>
</tr>
<tr>
<td></td>
<td>S-1a Areas with operations at 500 feet above ground within 250 feet of extended centerlines</td>
</tr>
<tr>
<td></td>
<td>Res=0.2 dwelling units/acre</td>
</tr>
<tr>
<td></td>
<td>Non-Res= 50-75 persons/acre</td>
</tr>
<tr>
<td>AO-3 Inner Turning Zone</td>
<td>Res= Infill to average of surrounding density</td>
</tr>
<tr>
<td></td>
<td>Non-Res= 100-150 persons/acre</td>
</tr>
<tr>
<td></td>
<td>S-1b Maneuvering zone-glide slopes</td>
</tr>
<tr>
<td></td>
<td>Res=0.2 dwelling units/acre</td>
</tr>
<tr>
<td></td>
<td>Non-Res= 50-75 persons/acre</td>
</tr>
<tr>
<td>AO-4 Outer Approach/ Departure Zone</td>
<td>Res= Infill to average of surrounding density</td>
</tr>
<tr>
<td></td>
<td>Non-Res= 150-200 persons/acre</td>
</tr>
<tr>
<td></td>
<td>S-1c Within 1/4 nautical mile of operations at less than 500 feet above ground level</td>
</tr>
<tr>
<td></td>
<td>Res=0.2 dwelling units/acre</td>
</tr>
<tr>
<td></td>
<td>Non-Res= 60-120 persons/acre</td>
</tr>
<tr>
<td>AO-5 Sideline Zone</td>
<td>Res= Infill to average of surrounding density</td>
</tr>
<tr>
<td></td>
<td>Non-Res= 100-150 persons/acre</td>
</tr>
<tr>
<td></td>
<td>S-1b Maneuvering zone-glide slopes</td>
</tr>
<tr>
<td></td>
<td>Res=0.2 dwelling units/acre</td>
</tr>
<tr>
<td></td>
<td>Non-Res= 50-75 persons/acre</td>
</tr>
<tr>
<td>AO-6 Traffic Pattern Zone</td>
<td>No limitations</td>
</tr>
<tr>
<td></td>
<td>S-2 Areas where operations are between 800-1,000 feet above ground level</td>
</tr>
<tr>
<td></td>
<td>Res=12-18 dwelling units/acre</td>
</tr>
<tr>
<td></td>
<td>Non-Res= 150-180 persons/acre</td>
</tr>
</tbody>
</table>

Noise: The relationship of the airport area affected by the LUCE Update to the projected noise contours for the 2023 Proposed Action in the adopted 2005 San Luis Obispo County Regional Airport (SBP) Master Plan Update using the latest INM model and the forecast provided in the adopted 2005 SBP
Master Plan Update and 2006 Environmental Assessment/Environmental Impact Report shown in Figure 5. Chapter 7 of the Draft Land Use Element proposes to use the 60 dB CNEL aircraft noise contour as the threshold for new urban residential areas.

REFERRING AGENCY OPTIONS:
If the Airport Land Use Commission (ALUC) determines, as recommended, that the proposed actions being reviewed are inconsistent with the Airport Land Use Plan (ALUP), the City shall be notified and the San Luis Obispo City Council may, after a public hearing, overrule the ALUC if both of the following conditions are met:

a. The City Council shall, at least 45 days prior to the decision to overrule the ALUC determination, provide the ALUC and the California Department of Transportation (Division of Aeronautics) with a copy of the proposed decision and findings, as required by State law, and shall include any comments from the ALUC and/or the Division of Aeronautics in the public record of any final decision to overrule the Commission.

b. The City Council votes to overrule the ALUC’s determination by at least a two-thirds vote of its members; and

c. The City Council makes specific findings that the proposed Land Use and Circulation Element (LUCE) Update and Draft Zoning Ordinance Amendment implementing the proposed LUCE Update are consistent with the purpose of Article 3.5 of the California Public Utilities Code, as stated in Section 21670, as follows:

i. To provide for the orderly development of the San Luis Obispo County Regional Airport as a public use airport and the area surrounding the Airport so as to promote the overall goals and objectives of the California airport noise standards pursuant to Public Utilities Code Section 21669 and to prevent the creation of new noise and safety problems; and

ii. To protect public health, safety, and welfare by ensuring the orderly expansion of the Airport and the adoption of land use measures that minimize the public’s exposure to excessive noise and safety hazards within areas around the Airport to the extent that these areas are not already devoted to incompatible uses.

Such findings may not be adopted as a matter of opinion, but must be supported by substantial evidence.

Should the City fail to override the ALUC determination by the above procedure, the ALUC may require that the City submit all subsequent actions, regulations, and permits to the ALUC for review.
FIGURES FOR REFERENCE:
Figure 1 – Proposed Development Projects
Figure 2 – Proposed General Plan Airport Area
Figure 2A – LUCE Sphere of Influence Planning Subarea
Figure 3 – Proposed General Plan Airport Area Compared to the existing ALUP Planning Area
Figure 4 – Proposed Airport Overlay Zone with Handbook Safety Zones
Figure 4A – Proposed Airport Overlay Zone with Specific and Area Plan areas
Figure 5 – Airport Overlay Zone with Projected Noise Contours
Figure 6 – ALUP Airport Noise Contours
Figure 7 – ALUP Airport Aviation Safety Areas
Response to Comment A8-1
The commenter notes the City referred the project to the ALUC in accordance with Public Utilities Code Section 21676 et seq. and the ALUC subsequently found the project inconsistent with the Airport Land Use Plan. The comment includes the notice of ALUC action including the findings. The City has followed the process described in PUC 21676 et seq. by referring the LUCE update and implementation to the Airport Land Use Commission (ALUC) for a determination of consistency with the San Luis Obispo County Regional Airport Land Use Plan (ALUP).

Response to Comment A8-2
The commenter references California Government Code Section 65302 (a)(b) which requires local jurisdictions to modify its general plan to be consistent with the ALUP and comments that the proposed project does not include criteria that demonstrate compliance with the ALUP. The commenter does not include the subsequent section Government Code Section 65302(c) which expressly allows for the legislative body to overrule the ALUC by adopting findings that demonstrate how the action will still satisfy the intent of the State Aeronautics Act. In the absence of substantial evidence indicating that the overrule may have a significant impact relative to safety, noise, or airport land use compatibility, there is no persuasive evidence that changes to the project are required to avoid an environmental impact. As such, altering the project description to an ALUP-compliant alternative is not required nor would it be of any environmental value. The City is acting in compliance with Government Code Section 65302(c) and PUC §21676 et seq. through the LUCE update process.

Response to Comment A8-3
The commenter questions the adequacy of the DEIR because consideration of an alternative that demonstrated consistency with the ALUP was not evaluated. An EIR must describe a reasonable range of alternatives to the project, or to the location of the project, that could feasibly attain most of the basic objectives of the project while avoiding or substantially lessening any of the significant effects of the project. CEQA Guidelines Section 15126.6(a), (f). The Final EIR determines, based on substantial evidence in the record, that the overrule will not have a significant impact relative to safety, noise, airport land use compatibility or any other component of the environment; therefore, the Final EIR characterizes the policy conflict between the LUCE update and the ALUP as Class 3, less than significant. CEQA requires an EIR to evaluate alternatives that might eliminate or reduce the Project’s significant adverse environmental effects. Because the EIR determines that the policy conflict between the LUCE Update and the ALUP is not a significant impact, CEQA does not require the EIR to evaluate an ALUP-compliant alternative. In other words, an ALUP compliant alternative is not required to be considered by the City because it has determined that the policy conflict between the LUCE and the ALUP is not significant. The City is acting in compliance with Government Code Section 65302(c) and PUC §21676 et seq. through the LUCE update process.

Additionally, the DEIR considered two land use alternatives – a reduced development alternative and the no project alternative. Both alternatives could be said to provide potential consistency with the ALUP but neither meets the project objectives nor do they result in lessening environmental impacts to air quality and circulation to less than significant levels.

Response to Comment A8-4
The commenter questions the adequacy of the DEIR because mitigation measures identified for land use compatibility (LU-2); airport noise exposure (N-4); and hazards (HAZ-2), are based on the assumption that the implementation of the proposed zoning ordinance amendment will reduce those impacts to less than significant. The commenter goes on to state that the mitigation measures cannot be implemented because they are in conflict with the ALUP and the City has not undergone the process to overrule the ALUC’s determination of inconsistency. The commenter is incorrect that the LUCE EIR identified Impact LU-2, N-4, and HAZ-2 as mitigation measures. The EIR in fact, found that with the implementation of policies and programs contained in the LUCE Update, impacts would be less than significant and no mitigation measures are required. Extensive evaluation of potential physical impacts occurred through the DEIR process. Appendix F of the DEIR provided in-depth analysis of noise, hazard, obstruction, and safety concerns associated with ongoing and future operations of the San Luis Obispo County Regional Airport as reflected in the adopted Airport Master
Plan. CEQA section 15002(g) defines a significant effect on the environment as “a substantial adverse change in the physical conditions which exist in the area affected by the proposed project.” Appendix F of Volume IV the DEIR evaluates potential physical constraints associated with current and future operations of the Airport and determined that significant physical impacts associated with the proposed project would be addressed by adherence to the State Aeronautics Act, FAA regulations, and guidance contained in the Caltans Airport Land Use Planning Handbook. The LUCE update includes policies and programs to adhere to state and federal guidelines and standards. The Airport Compatibility Report (Appendix F of Volume IV of the EIR) describes the flaws in the existing ALUP such as: safety zones not aligned with the runway and not reflective of runway length changes constructed in recent years and depicted on the FAA-approved Airport Layout Plan; and the ALUP is not consistent with the Airport Master Plan, the Airport Layout Plan, and the FAA-approved Terminal Area Forecast of operations as required by state law. Therefore the evaluation of physical impacts and associated implementation was based on the policy sources and state and federal standards. The City is not required to overrule the ALUC to evaluate physical impacts and identify potential implementation or mitigations. CEQA Section 21096 indicates that an EIR prepared for a project within an ALUP shall use the Airport Land Use Planning Handbook published by the Division of Aeronautics in compliance with Section 21674.5 of the Public Utilities Code as a technical resource to assist in the EIR preparation as it relates to airport related safety hazards and noise problems.

The commenter indicates the potential impacts associated with single noise events from aircraft should be evaluated. Impacts related to aircraft noise are typically assessed using an average metric called the Community Noise Equivalent Level (CNEL), which is an average noise level. Neither the Airport Master Plan EA/EIR (AMP EA/EIR) nor the ALUP included standards or mitigations associated with single noise events. Page 4-10 of the California Airport Land Use Planning Handbook indicates that application of single-event peak noise criteria poses questions in defining the number of events considered to be significant. The AMP EA/EIR includes single event descriptors for informational purposes only and did not use them to determine the significance of impacts. Page 4-5 of the Handbook describes normalization factors and recommended adjustment factors to the baseline criteria of 65 dB set by the FAA to consider when setting land use compatibility factors. The California Airport Land Use Planning Handbook discusses land use compatibility criteria related to noise in Chapter 4 and discusses noise as a particular issue for noise sensitive uses such as residential, school, and hospital types of land uses. Chapter 4 of the Handbook indicates “for the purposes of land use or building design criteria, cumulative noise exposure metrics are the easiest to implement in that exterior noise is most often measured in these terms.” In addition, the same section of the Handbook indicates, “Given the noise level reduction provided by standard residential construction, interior noise level standards can generally be satisfied without the need for special sound insulation measures in locations where exterior noise exposure is less than 60-65 dB CNEL.” The LUCE update policies, programs, and implementation are designed to demonstrate compliance with Section 3.5 of the State Aeronautics Act, as stated in Section 21670 to protect the public’s “exposure to excessive noise and safety hazards within areas around public airports to the extent that these areas are not already devoted to incompatible uses.” The assumptions regarding aircraft operations amounts, types, spatial and temporal distribution is reflected in Figure 5.1-6 of the AMP EA/EIR. The AMP EA/EIR operations assumptions were entered into the Integrated Noise Model version 7.0d and generated noise contours that were compared to the AMP EA/EIR on page 52 of the Compatibility Report (Appendix F in Volume IV of the LUCE EIR). The resultant noise contours confirmed the AMP EA/EIR information as an accurate mapping of the long term noise impact of the airport’s aviation activity that is tied to the ultimate facilities development depicted in the FAA-approved Airport Layout Plan. The City’s use of the Airport Master Plan noise contours for purposes of development of its LUCE Update noise contours and the application of a 60 dB CNEL exterior noise standard and 45 dB CNEL interior noise standard for new residential uses is appropriate and is consistent with FAA and State aircraft noise planning standards (Handbook, Page 4-46).

The Airport Master Plan EA/EIR states that the CNEL descriptor is used by the State of California and San Luis Obispo County to evaluate land use compatibility around airports. This document also notes in Appendix O that a “Single event descriptor are used in this EA/EIR for informational purposes only and are not used to determine whether or not an impact is significant.” While not applicable to the analysis in the LUCE Update, more information can be found in the AMP EA/EIR found at this link: https://secure2.techxpress.net/sloairport.com/images/uploads/pages/File/Final%20Environmental%20Assessment%20and%20Environmental%20Impact%20Report/Appendix%20O-%20Regulatory%20Context.pdf

Note:
Dear Ms. Murry,

Thank you for the opportunity to review the Draft LUCE Program EIR. You and your team are to be commended: providing excellent support to TF-LUCE, hosting dynamic workshops, posting documents to the web in a timely manner, and sponsoring a truly outstanding consulting team.

I wish the past year had afforded me the time to more fully participate. As it is, I managed to attend one future fair, one community workshop, three TF-LUCE meetings, and one city council meeting. I feel that the new language in the circulation element concerning transit service is an improvement, yet does not go far enough to hold policy makers accountable for transit improvements aimed at increasing transit ridership among teenagers. I have since done my part by speaking with Stephanie Hicks and Angela Nelson (SLOCOG), and Leslie O’Connor (SLO High). All parties seems enthusiastic about a more comprehensive vision of Safe Routes to School; one that features transit treatments as well as ped and bike improvements. Sadly, enthusiasm will not be enough. What appears to be lacking is a defined project within the scope of the LUCE Program EIR. Please reconsider. At minimum, I’d like to see a bus stop at the school’s main entrance.

My single biggest concern about the Draft LUCE Program EIR is the proposed mitigation for Broad at Tank Farm found on page 4-346 (reference intersection #98). I recommend that any change to Broad at Tank Farm be fully consistent with a road diet for Tank Farm east of Broad; one that reduces Tank Farm from four lanes to two lanes, as is likely needed to resolve alarming pedestrian safety issues crossing Tank Farm at Poinsettia. Furthermore, I request that the final EIR include a road diet for Tank Farm east of Broad Street.

The most recent vehicle vs. pedestrian injury collision at this location occurred earlier this month. I was on scene and spoke to emergency responders, who urged me to address the city council regarding long-held neighborhood concerns about pedestrian crossing safety for Tank Farm at Poinsettia. Just last week, two good folks from SLO City Public Works, Matt Crisp and Jennifer Rice, walked the intersection with me to survey conditions. Among the three of us, there appeared to be general agreement about the proposed road diet.

I would hate to see any implied or explicit endorsement of delay mitigation at the adjacent signalized intersection at Broad that could potentially be at odds with collision mitigation at Poinsettia. I invite you to consider the collision diagram, which does not include the most recent vehicle vs. ped collision that happened on or around July 14. (Collision diagram and related documentation attached.) I also urge you to talk with Matt Crisp. He reported to me that he’s been called to evaluate ped safety at Poinsettia no fewer than six times in the past eight years.

Thank you for your time and your faithful work throughout this lengthy process. I realize there are many high priority locations that require time and attention. I
respectfully request that the final LUCE EIR include a road diet for Tank Farm east of Broad and that the road diet be reflected in any delay mitigation for Broad at Tank Farm. I welcome the opportunity to chat with you about the existing ped, bike, and / or vehicle experience at this location. I'm sure you'll agree that none of these experiences is satisfactory and potentially aggravated by mitigation measure cir-2.r.

CIR-2.r Broad & Tank Farm (#98)
- Establish time-of-day timing plans.
- Add SB dual left-turn lane, NB dedicated right-turn lane and WB dedicated right-turn lane.
- Augment Bicycle facilities and improve transit headways on Broad Street.

Please let me know what you think. Best, Kimberley Wormley

Kimberley Wormley | San Luis Obispo, CA | 2 Th 2:16 - 17
Call (805) 549-9498 | Text (805) 602-0121 | Mail kimberley@wormley.net
Response to Comment P1-1
The commenter provides general support for the proposed LUCE Update as it relates to transit policies and believes they are an improvement from the current General Plan policies. However, the commenter states that the LUCE EIR is missing a defined transit project that addresses safe routes to school – specifically for high school-aged students (e.g., minimally a bus stop at the high school’s main entrance). The LUCE Update includes policies promoting Safe Routes to School. The City continues to collaborate with local school district officials to identify eligible pedestrian and transit facility improvements that may be funded through the State’s Active Transportation Program (ATP) grant program. The City reviews requests for transit improvements as part of its Short-Term Transit Plan, which is currently being updated. These concerns have been noted and will be provided to the Planning Commission and City Council for consideration in the decision making process.

Response to Comment P1-2
The commenter recommends that the proposed mitigation for the Broad Street/Tank Farm intersection on page 4-346 be consistent with a Tank Farm road diet (reduce from four to two through lanes) and that a Tank Farm road diet east of Broad Street be included in the EIR. A lane diet of Tank Farm Road east of Broad Street is not proposed as part of the LUCE Update. All proposed mitigation measures addressing identified impacts of implementing the LUCE Update will include detailed engineering-based safety assessments consistent with City policy. These concerns have been noted and will be provided to the Planning Commission and City Council for consideration in the decision making process.

Response to Comment P1-3
The commenter cites safety concerns and accident history at the Tank Farm Road/Poinsettia Street intersection. This comment regarding operating conditions at Tank Farm Road/Poinsettia Street pertains exclusively to the merits of existing infrastructure and does not pertain to the adequacy of the analysis in the DEIR. The City reviews pedestrian/bicycle/vehicular safety issues on an on-going basis as part of its annual traffic safety program. These concerns have been noted and will be provided to the Planning Commission and City Council for consideration in the decision making process.

Response to Comment P1-4
See Responses to Comment P1-1 – P1-3.
July 28, 2014

Kim Murry, Deputy Director
Community Development Department
City of San Luis Obispo
919 Palm Street
San Luis Obispo, CA 93401
Email: kmurry@slo.org

Comments of the Sierra Club on the SLO LUCE Draft Program EIR and Draft Land Use and Circulation Elements

Dear Ms. Murry,

The Santa Lucia Chapter of the Sierra Club, representing more than 2,000 members in San Luis Obispo County, submits these comments on the public drafts of San Luis Obispo’s Land Use and Circulation Elements and the Draft Program Environmental Impact Report. As the nation’s oldest and largest grassroots environmental organization, the Sierra Club’s overall mission is to enjoy, explore and protect the planet.

We are pleased to see much of this philosophy reflected in sections of the public drafts of the Land Use and Circulation elements, but we note a considerable gap between aspirations and outcomes both in the updates and in the Draft EIR. We urge the City to do more in the way of crafting specific measures in all three documents that will both serve to provide additional mitigation of currently unmitigatable Class 1 significant impacts identified in the EIR and continue to raise the bar for protection of the environment, public health and the quality of life, a planning legacy for which the city is nationally known. San Luis Obispo was the first city in the world to ban smoking in the workplace and bars, followed by bans on outdoor smoking and drive-thru windows. The decision to create Mission Plaza rather than build a parking garage, followed by the creation of a Natural Resources Manager position and programs to acquire open space and create a green belt, and the foresight in mandating full tertiary treatment and re-use of wastewater, put the city at the leading edge of the American planning renaissance and created the quality of life that made SLO “one of the happiest cities in the United States.” It did not get there by adopting policies of adherence to the status quo.

The focus of the LUCE update in planning for the next twenty years should be to match or exceed the legacy of the last twenty years, laying out a future for San Luis Obispo commensurate with the accomplishments of the past. The administrative draft of the EIR, in its consideration of measures to
mitigate the impacts of future development, offers sad evidence that the few attempts by the LUCE Task Force to do so have been struck out in the public review draft and replaced by the standard directive to comply with existing ordinances, specific plans and design standards.

The requirement of providing mitigation for potential impacts provides the City with an opportunity to innovate. This update this will serve as the planning bible for the next twenty years, but in analyzing mitigation measures, the EIR hews to the standard practice of simply citing compliance with the Building Code, policies in other existing elements and “reliance on establishment of project-specific mitigation measures” and calling it done. Rather than proclaiming the status quo, the City can and should go beyond these minimum requirements. The strike-out of suggested specific measures, replacing them with plan citations, points to a long-term planning element heading in the wrong direction. The LUCE update should be setting the bar and establishing a planning vision for the next twenty years.

We suggest that specific mitigations which go above and beyond the requirements of the City’s current management plans be made a prominent feature of the EIR. Those that have been suggested and deleted in the Task Force process should be restored, and more should be added. These should augment the standard directive of adhering to the measures found in existing management plans to achieve the minimum required levels of mitigation that will reduce the environmental impacts of the city’s future development below the level of significance.

We anticipate the argument that specific mitigation measures are best left to the specific management plans because they will themselves be updated over the next twenty years, presumably with revised measures that will require the implementation of new techniques based on improved knowledge that will strengthen environmental protections, therefore the Draft EIR’s regimen of citing these plans as mitigation will produce the desired result.

We submit that this amounts to the tail wagging the dog. Future updates of the City policies should be guided by the vision the City provides in the LUCE Update Project. This guidance is all the more necessary because those future plan updates will be conducted on a much smaller scale than the LUCE update, at sparsely attended meetings, with nothing like the public outreach component that has been part of the LUCE update process. For that reason, mitigations that exceed the minimums of existing plans and policies should be a vital part of the LUCE update, rather than settling for status quo citation of existing plans in the EIR. If the City is to build on its public planning achievements of the last five decades, this document is the place where that must happen.

Vision is the one critical element the LUCE update must have if it is to succeed. We remind the planning commission and city council of the legacy that is in your charge, and urge you to bring the vision to the LUCE update necessary to preserve and continue that legacy. The following are the Sierra Club’s suggestions to that end.
Draft Program Environmental Impact Report

Significant Class 1 Traffic and Air Quality impacts support adoption of 6.3 - Reduced Development Alternative

Per Impact AQ-2 (long-term) - pg. 4-55, Mitigation Measures and Significance After Mitigation -pg. 4-59, and Impact CIR-1 - pg. 4-341, the traffic and long-term air quality impacts of the LUCE Update Project are considered Class 1 – significant and unavoidable even with mitigation. Under proposed development and street network changes, nearly twenty roadways are projected to deteriorate to Level of Severity F. The growth in vehicle miles traveled (VMT) “from 2012-2035 would be approximately 34%, which is more than the population growth of 22%” (pg. 4-56). The projected air quality impacts would violate Conservation and Open Space Policy 2.2.3 (“No decline. Air quality should not decline from levels experienced during the early 1990s, when the community’s growth capacity was last re-examined.”) A severe increase in traffic congestion, deteriorating air quality, and corresponding reduction in the quality of life clearly does not meet the goals and objectives listed in the LUCE Update as an expression of “the community’s preferences for current and future conditions and directions.”

Reliance on the citation of existing standards and plans as mitigations will not meet the sustainability goals of the LUCE update

In addition to the need to mitigate Class 1 impacts and the City’s presumptive goal of remaining innovative and maintaining the highest possible quality of life, there is a larger and more urgent reason for discarding the notion that following existing policies will mitigate most impacts of the LUCE Update Project below a level of significance. None of the existing General Plan policies, standards or specific plans anticipated the degree of climate instability and the rapid onset of impacts from climate change that we are now witnessing. Reliance on previously adopted policies, many of which consist of voluntary provisions, will not be sufficient to meet the challenge of a future marked by significant decreases in precipitation, groundwater, and the level of the Sierra snowpack. The EIR’s rote citation of existing policies as sufficient to reduce virtually all potential environmental impacts below a level of significance does not take into account the current magnitude and accelerating rate of the climate crisis and the level of uncertainty this has created in planning policy. The LUCE Update must provide policies and mitigation measures to meet the challenges of the City’s present reality and probable future.

4.7.1b Regulatory Setting

Add:

Executive Order S-3-05 should be included in the Regulatory Setting language on pages 4-143 and 144, along with AB 32, SB 375, and the Advanced Clean Cars Rule.

Reason for addition: In the rapidly shifting reality of global warming and GHG emissions, and the interactions occurring in the feedback loop between the two, the Climate Action Plan’s goal of reducing GHG emissions 15 percent below 2005 levels should be viewed as a floor, not a ceiling, and mitigation measures in the LUCE update should be implemented with the goal of significantly increasing that level
of reduction, as rapidly as possible, to meet the goal of responding to new State planning requirements and to avoid the obsolescence implicit in using the CAP’s 2020 GHG emission reduction targets. Extrapolating reductions from 2020 to 2035 based on current CAP emission reduction strategies (Table 4.7-2) results in the City exceeding the 2035 Target Emissions Limit by 86,200 metric tons. The City will need to adopt additional GHG reduction measures if it is to stay on track to meet the state’s long-term emission reduction goals, as set forth in California Executive Order S-3-05 and cited in the City of San Luis Obispo Climate Action Plan (pg. iv), setting a goal of reduction of GHG emissions 80% below 1990 levels by 2050.

**Land Use Element**

The update should achieve the Community’s Goals

As listed on page 15, the 13 Community Goals include "protect and enhance the natural environment...protect, sustain, and where it has been degraded, enhance wildlife habitat...protect and restore natural land forms and features in and near the city, such as the volcanic morros, hillsides, marshes, and creeks." To realize these goals, several policies should be added to the draft, and several proposed policies that are at odds with these goals should be amended or deleted:

- **3.5.7.8 Tourism**

Add:

*C: Develop tourism marketing programs that highlight the city as a visitor destination. In conformance with the Open Space ordinance requiring that the City’s open space areas shall be acquired and maintained for the use of residents, tourism programs are not to include the national marketing of the City's designated Open Space areas.*

Reason for addition: The national marketing of local open space has resulted in overburdened neighborhoods and the decline of a resource that was intended to serve the needs of residents for open space.

- **3.5.7.12 Business Retention and Expansion.**

Delete:

*The City shall implement the Economic Development Strategic Plan and other appropriate strategies for business retention and expansion with a focus on those providing head of household jobs.*

Reason for deletion: The Economic Development Strategic Plan contains a host of policy prescriptions not generally known to the public and which have not been the subject of broad public discussion.
("Community input" and "public engagement" in the creation of the EDSP consisted of interviews with 31 individuals, primarily from the business community, who were consulted in search of "an insider perspective" -- Draft EDSP, page 43.) These policies include the "streamlining" of environmental review and the concept that new development pay a subjective "fair share," a significant departure from the longstanding policy that development pay its own way. We see no comparable document from organizations advocating for the preservation of the City’s established neighborhoods and/or natural resources being implemented via this update to the General Plan. There has been no comparable opportunity for these stakeholders to have their goals implemented wholesale in the Land Use Element. Making multiple sweeping changes to City policy via the incorporation by reference of the EDSP in one sentence in the Land Use Element is inappropriate.

-6.4.5 Runoff Reduction and Groundwater Recharge

Amend:

*The City shall **encourage** **require** the use of methods to facilitate rainwater percolation for roof areas and outdoor hardscaped areas....*

Reason for amendment: In the midst plummeting groundwater levels and the worst drought in California’s recorded history, the state is moving rapidly to put mandatory regulations in place to conserve water, having found voluntary measures to be wholly ineffective. The City should follow suit and acknowledge the reality that "encouragement" is not an adequate response to the crisis nor sufficient as a policy to protect the City against future crises, nor will it help prepare the City for a likely future of significantly reduced water resources.

-6.4.6 Development Requirements

Amend:

*The City shall **encourage** **require** project designs that minimize drainage concentrations and impervious coverage....*

Reason for amendment: See above.

-6.5.1 Previously Developed Areas

Restore deleted text A.-D.:

A. Ensure that infill, remodel, and replacement projects.... [etc.] D. Ensure that any new development in the watershed detains rather than accelerates runoff from development sites.
Reason for restoration: See discussion of the Draft EIR’s overreliance on the citation of existing ordinances, standards, specific plans, etc. as mitigation for the potential impacts of development. The Land Use and Circulation Elements are to guide City planning for the next twenty years. If the update of these documents is content with merely pointing to existing policies, this will virtually guarantee the result of growth outstripping policy. New, specific measures such as those proposed here but deleted from the public draft must be added to supplement existing policies if the City is to have a chance of realizing Community Goals over the next two decades.

-8.3.2.6 SP-4 Avila Ranch Specific Plan Area

Delete Footnote 1 at Performance Standards – Open Space/Agriculture:

1. Up to 1/3 of the open space may be provided off-site or through in lieu fees consistent with the Airport Area Specific Plan. Required Open Space may be reduced up to 30% of the site proportionally to the amount of affordable housing provided on-site in a ratio consistent with the Regional Housing Needs Allocation beyond inclusionary housing requirements.

Reason for deletion: It is not appropriate to trade off open space for affordable housing or otherwise place them in competition, and overall the City should terminate the biologically dubious practice of offsite mitigation. This is a recipe for habitat fragmentation, violating the well-known principle of wildlife biology that the value of open space as an ecosystem and habitat declines as size is reduced. Unless the City is prepared to show that such lands always provide not only equivalent acreage but equivalent environmental values and identical bioa, and the research and confirmation of such values can be shown to be a regular staff function when determining mitigation, as performed by credentialed personnel with the ability to carry out such an evaluation, including monitoring and follow-up to ensure those values continue in perpetuity on off-site mitigation lands, the concept of off-site mitigation should be removed from City policy.

-9.3.7D Sustainable Design - Plumbing

Add:

Utilize plumbing fixtures that conserve or reuse water such as low flow faucets or grey water systems, and implement a builder incentive program that will encourage new homes to be built with onsite water recycling system included.

Reason for addition: Earlier this year, the City of Lancaster and KB Homes created the “Double ZeroHouse,” which achieves net-zero energy and uses zero fresh water for irrigation, recycling 95% of drain water via a grey water system, and 80% of the energy via a grey water heat recovery system that extracts energy from drainwater and uses it to preheat water in the home’s water heater. Lancaster is pursuing the goal of become America’s first net-zero city. San Luis Obispo should join it.
Circulation Element

1.9 Support Technologically Sound Environmental Advancement

Add:

1A The City will continue to support the use and development of compressed natural gas and biodiesel fueling stations, EV recharging stations, and other alternative fuel stations in the San Luis Obispo area.

Reason for addition: If the City doesn't currently support the use and development of alternative fuel and EV charging stations, it needs to do so as policy. A policy favoring a single type of alternative fuel is clearly inappropriate as policy and inadequate to meet the City's overall planning goals for energy use and pollution reduction.

2.1.3 Large Employers

Restore text:

...For employers with 50 or more employees the program will be structured as follows: Candidate employers will be surveyed to determine base year average vehicle ridership (AVR) levels,... [etc. ] If meaningful progress has not been made toward achieving AVR targets, then the City will consider adopting a mandatory trip reduction ordinance.

Reason for restoration: This is one of multiple instances in the draft Land Use and Circulation Elements in which a proposal for specific measures has been deleted and replaced with text that offers a general directive consisting of unspecified actions. As a result, the current version of this policy has very little chance of actually reducing VMT, a goal which the text proposed for deletion can achieve via measurable targets, benchmarks and accountability.

3.0.6 Service Standards

Restore text:

The frequency of City transit service will compare favorably with the convenience of using private vehicles.

Reason for restoration: The frequency of bus service is perhaps the single largest complaint about and barrier to wider use of local and regional transit. A transit service policy that seeks to make the system more convenient and accessible but refuses to address this specific issue will be a failed policy.

6.0.5 Mitigation (DEIR: 6.0.E)
Delete:

For significant impacts, developments shall be responsible for their fair share of any improvements required. (And at 6.0.5c Transit.)

Reason for deletion: The City has long required that new development “pay its own way” in terms of funding the costs of new infrastructure required as a result of the development. The “fair share” language proposed throughout the draft Land Use and Circulation Elements represents a subjective standard and constitutes a significant change in policy without a public discussion commensurate to its magnitude, including the implications of potentially shifting much of the cost of new development from private developers onto the public.

9.0.1 New Development

Amend:

The City shall require that new development will be responsible assumes its fair share of responsibility for constructing new streets, bike lanes, sidewalks, pedestrian paths and bus turn-outs or reconstructing existing facilities as mitigation for the impacts of development.

Reason for amendment: See above at 6.0.5 Mitigation.

9.1.6 Streescapes and Major Roadways

Amend:

...the City shall promote the creation of “streescapes” on the “Complete Streets” model and linear scenic parkways...

Reason for amendment: The draft Circulation Element at 9.1.4 Conceptual Plan for the City's Center mandates the evaluation of “complete street” designs, and the EIR refers frequently to the "complete streets" measure found in the Climate Action Plan as a strategy consistent with LUCE update policies proposed to reduce GHG emissions. An explicit General Plan policy supporting the adoption of the complete streets concept citywide should be part of the Circulation Element.

Add policy:

14.0.4 Unbundled parking

The City shall introduce unbundled parking, congestion pricing, shared parking, fair price policies, positive transportation demand management (TDM) and the other components of an Intelligent Parking
program for schools and government buildings, with the goal of creating a Request for Proposal process for full implementation.

Reason for addition: See 16.0.2 Encourage Alternative Transportation. In furthering the goal of adopting strategies that significantly reduce VMT and greenhouse gas emissions, parking policies that eliminate or reduce minimum parking requirements have been shown to be one of the least costly tools to reduce VMT. Per the Victoria Transport Policy Institute, unbundling car parking costs has been shown to reduce parking requirements up to 30% and thereby reduce vehicle traffic, providing additional benefits in reduced congestion, accidents, energy consumption, pollution emissions and consumer costs. There is no such thing as “free parking,” which always reduces wages or increases costs. Unpriced parking is often “bundled” with building costs, which means that a certain number of spaces are automatically included with building purchases or leases. Unbundling Parking means that parking is sold or rented separately. Reducing parking subsidies promotes equity, so that transit users and other non-drivers are not subsidizing drivers. People who take public transit or walk do not have to pay higher prices at stores to pay for parking or receive reduced wages because their employers spend money to provide parking to employees.


16.0.6 New Policy

Typo:

The City shall encourage SLOCOG...so that San Luis Obispo County becomes a "self help" county.

16.1.2 Multi-Modal Impact Fee

Delete:

The City shall update its multimodal transportation impact fee ordinance in accordance with State Law (AB 1600) that requires developers to fund their fair share of projects and programs that mitigate city-wide transportation impacts caused by new development.

Reason for deletion: State law requires that local agencies imposing development impact fees identify the purpose to which the fee is to be put, demonstrate a reasonable relationship between the fee and the purpose for which it is charged, and, if it is determined that funding of public facilities is required, determine a reasonable relationship between the need for the public facility and the development project. The term “fair share” does not appear in AB 1600 as codified in Government Code 66000-66006. The "fair share" language proposed throughout the draft Land Use and Circulation Elements represents a subjective standard and constitutes a significant change in policy without a public discussion commensurate to its magnitude, including the implications of potentially shifting much of the cost of
new development from private developers onto the public. The City’s impact fee policy should continue to rely on this simple maxim:

Development...must pay for 100 percent of the incremental costs of new services it necessitates... We need urban growth in urban areas. But urban areas don't just happen. They must be carefully developed without burdening either the taxpayer or the systems their taxes support.

- J. Charles Gray, Chairman, Economic Development Commission of Mid-Honda Inc.

Thank you for this opportunity to comment on the City’s draft Land Use and Circulation Element Updates and Environmental Impact Report.

Andrew Christie, Chapter Director
A Plan to Efficiently and Conveniently Unbundle Car Parking Costs

Paper 2010-A-554-AWMA

Mike R. Bullock, Retired Satellite Systems Engineer (36 years), 1800 Bayberry Drive, Oceanside, CA 92054. Jim R. Stewart, PhD, University of the West, 1409 N. Walnut Grove Avenue, Rosemead, CA 91770.

ABSTRACT

The Introduction shows documented driving reductions due to the pricing of parking. It notes that although the benefits of priced and shared parking are known, such parking has not been widely implemented, due to various concerns. It states that a solution, called “Intelligent Parking,” will overcome some of these concerns, because it is easy to use and naturally transparent. It asserts that this description will support a “Request for Proposal” (RFP) process. Eight background information items are provided, including how priced parking would help California achieve greenhouse gas reduction targets. A story demonstrates some of the key features of Intelligent Parking. Arguments for less parking, shared parking, and priced parking are made. Barriers to progress are identified. The fair pricing of parking is described. New ways to characterize transportation demand management are presented. Seven goals of Intelligent Parking are listed. Eleven definitions and concepts, that together define Intelligent Parking, are described. This includes a method to compute a baseline price of parking and how to adjust that price instantaneously to keep the vacancy above 15% (“Congestion Pricing”). An implementation strategy is described.

INTRODUCTION:

It has been well established that appropriately priced parking will significantly reduce driving\(^1\). Most case studies presented in Table 1 are evaluations of the most general type of “car-parking cash-out”: a program that pays employees extra money each time they get to work without driving. They show that a price differential between using parking and not using parking will significantly reduce driving, even when transit is described as poor. Since driving must be reduced\(^2\), the pricing of parking is desirable.

Shared parking is also recognized as desirable because it can sometimes result in less parking being needed.

Although the advantages of pricing and sharing parking have been recognized for many years, these practices are still rare. This paper identifies some of the reasons for this lack of progress. The pricing and sharing method of this paper has a natural transparency and ease of use that would reduce many of the concerns. This paper also suggests that those governments that have the necessary resources can take the lead role in developing and implementing the described systems. These governments will recover their investments, over time.

This paper describes how parking facilities could be tied together and operated in an optimum system, named Intelligent Parking. The description of Intelligent Parking is sufficient to support a “Request for Proposal” process, leading to full implementation.

There are two distinct parts to Intelligent Parking. The first is how to set the price. The second is how to distribute the earnings. Briefly, the earnings go to the individuals in the group for whom the parking is built.
Table 1  Eleven Cases of Pricing Impact on Parking Demand

<table>
<thead>
<tr>
<th>Location</th>
<th>Number of Workers @ Number of Firms</th>
<th>1995 S’s Per Mo.</th>
<th>Parking Use Decrease</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Group A: Areas with poor public transportation</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>West Los Angeles</td>
<td>3500 @ 100+</td>
<td>S81</td>
<td>15%</td>
</tr>
<tr>
<td>Cornell University, Ithaca, NY</td>
<td>9000 Faculty &amp; Staff</td>
<td>S34</td>
<td>26%</td>
</tr>
<tr>
<td>San Fernando Valley, Los Angeles</td>
<td>850 @ 1</td>
<td>S37</td>
<td>30%</td>
</tr>
<tr>
<td>Costa Mesa, CA</td>
<td>Not Shown</td>
<td>S37</td>
<td>22%</td>
</tr>
<tr>
<td><strong>Average for Group</strong></td>
<td></td>
<td>S47</td>
<td>23%</td>
</tr>
<tr>
<td><strong>Group B: Areas with fair public transportation</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Los Angeles Civic Center</td>
<td>10,000+ @ “Several”</td>
<td>S125</td>
<td>36%</td>
</tr>
<tr>
<td>Mid-Wilshire Blvd, Los Angeles</td>
<td>1 “Mid-Size” Firm</td>
<td>S89</td>
<td>38%</td>
</tr>
<tr>
<td>Washington DC Suburbs</td>
<td>5,500 @ 3</td>
<td>S68</td>
<td>26%</td>
</tr>
<tr>
<td>Downtown Los Angeles</td>
<td>5,000 @ 118</td>
<td>S126</td>
<td>25%</td>
</tr>
<tr>
<td><strong>Average for Group</strong></td>
<td></td>
<td>S102</td>
<td>31%</td>
</tr>
<tr>
<td><strong>Group C: Areas with good public transportation</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>U. of Washington, Seattle, WA</td>
<td>50,000 employees, students</td>
<td>S18</td>
<td>24%</td>
</tr>
<tr>
<td>Downtown Ottawa, Canada</td>
<td>3,500 government staff</td>
<td>S72</td>
<td>18%</td>
</tr>
<tr>
<td>Bellevue, WA</td>
<td>430 @ 1</td>
<td>S54</td>
<td>39%</td>
</tr>
<tr>
<td><strong>Average for Group, except Bellevue, WA Case</strong></td>
<td><strong>$45</strong></td>
<td></td>
<td>21%</td>
</tr>
<tr>
<td><strong>Overall Average, Excluding Bellevue, WA Case</strong></td>
<td><strong>$45</strong></td>
<td></td>
<td>25%</td>
</tr>
</tbody>
</table>

*Belleview, WA case was not used in the averages because its walk/bike facilities also improved and those improvements could have caused part of the decrease in driving.

PERTINENT BACKGROUND INFORMATION

- Vehicle miles traveled (VMT) are a major cause of global warming and pollution\(^2,3\).
- California’s Metropolitan Planning Organizations (MPOs) will need to adopt strategies that reduce vehicle miles traveled (VMT), in order to meet SB375 GHG reduction targets, to be issued by the California Air Resources Board in late 2010, for years 2020 and 2035\(^2\).
- The appropriate pricing of parking is one of the least costly documented tools to reduce VMT.
- New technologies, such as sensors feeding computer-generated billing, offer the potential to efficiently bill drivers for parking and alert law enforcement of trespassers.
- Reformed parking policies can increase fairness, so that, for example, people who use transit or walk do not have to pay higher prices or suffer reduced wages, due to parking.
• Methods to unbundle parking cost are inefficient unless they support the spontaneous sharing of parking spaces. Shared parking with unbundled cost would ultimately allow cities to require significantly less parking.

• Typical systems of timed parking and metered parking are far from ideal. Parking has no automated record keeping, so it is difficult to know where there is too much or too little.

• Good policies will eventually let cities turn parking minimums into parking maximums.

A GLIMPSE INTO A POSSIBLE FUTURE

Jason is driving to work for the first time in several years. He has decided to save money by carrying home a new 3-D, big-screen computer, which he plans to purchase at a store near his office after work. He wanted to avoid paying delivery charges.

Things have been changing around his office development since they unbundled the cost of parking at the near-by train station. Many people who caught the early trains and lived close to the station stopped driving and parking in the best parking spaces; demand for housing close to the station went up; and wealthy riders, who insisted on driving, did so, confident that they could always find parking as close to the platform as their schedules required, due to congestion pricing. Who would have guessed how much those people were willing to pay? It was shocking. Parking-lot earnings, paid to round-trip train riders, meant that the net cost to ride the train went significantly down. Ridership and neighborhood vitality both went significantly up. All Jason knew was that the price to park at his office had been going up yearly because of increased land values. His parking-lot earnings from his office had been increasing almost every month, due to the ripple effect of train riders parking off-site at cheaper parking. Some of them were using his office parking.

As he pulls out of his driveway, he tells his GPS navigation unit his work hours (it already knew his office location), the location of the store where he plans to buy the computer, and his estimated arrival and departure times at the store. He tells the GPS unit he wants to park once, park no more than 1 block from the store, walk no more than 1 mile total, and pay no more than an average of $2 per hour to park. He is not surprised to hear the GPS tell him that his request is impossible. He tells the GPS he will pay an average of $3 per hour and learns that the GPS has located parking.

It guides him into a church parking lot. He hopes the church will use his money wisely. The GPS tells him the location of a bus stop he could use to get to work and the bus’s next arrival time at the stop. With automatic passenger identification and billing, the bus has become easy to use, except that it is often crowded. Jason gets out of the car and walks to work, with no action required regarding the parking.

Three weeks later, when Jason gets his monthly statement for his charges and income for automotive road use, transit use, parking charges, and parking earnings. He finds that the day’s parking did indeed cost about $30 for the 10 total hours that he parked. He notes that the parking-lot earnings for his office parking averaged about $10 per day that month. He then notices the parking lot earnings from the store, where he spent about $1000 dollars. He sees that the parking-lot earnings percent for the store that month was 1.7%, giving him about $17. So for the day, Jason only spent a net of about $3 on parking. Then he realized that he should have had the computer delivered after all. If he would have bicycled that day, as he usually did, he would have still gotten the $27 earnings from the two parking facilities and he would have paid nothing.
for parking. So the choice to drive cost him $30. He remembers that the delivery would have only been $25 dollars. Oh well. He enjoyed his before-work and after-work walks.

**THE CASE FOR LESS PARKING**

Less parking will support more compact development.\(^1\) This makes walking and biking more enjoyable and less time consuming. There would certainly be less “dead space”, which is how parking lots feel to people, whether they arrive by car or not, after they become pedestrians.

Since parking can be expensive, less parking can reduce overhead costs significantly, such as leasing expense and parking-lot maintenance cost. Less overhead means more profit and less expense for everyone. A need for less parking can create redevelopment opportunities at existing developments and reduce project cost at new developments.

At new developments, car-parking costs could prevent a project from getting built.\(^2\)

**THE CASE FOR SHARED PARKING**

Shared parking for mixed uses means that less parking is needed. For example, shared parking could be used mostly by employees during the day and mostly by residents at night.

Fully shared parking means that very little parking would be off limits to anyone. In a central business district with shared parking, drivers would be more likely to park one time per visit, even when going to several locations. Pedestrian activity adds vitality to any area.

**THE CASE FOR APPROPRIATELY-PRICED PARKING**

**To Reduce Driving Relative to Zero Pricing**

*Traditional Charging or Paying Cash-out Payments*

As shown in the Introduction, this relationship (pricing parking reduces driving) is not new.\(^3\)

Using results like Table 1, at least one study\(^4\) has used an assumption of widespread pricing to show how driving reductions could help meet greenhouse gas (GHG) target reductions. Dr. Silva Send of EPIC [http://www.sandiego.edu/epic/ghgpolicy/](http://www.sandiego.edu/epic/ghgpolicy/) assumes that all work locations with 100 employees or more in San Diego County will implement cash-out, to result in 12% less driving to work. Currently, almost all employees in San Diego County “park for free”, unless they happen to work in a downtown core area.

---

1. This is especially true of surface parking, which only accommodates 120 cars per acre.


At the review, developer Tom Wiegel said, “Parking is the number 1 reason to do nothing,” where “do nothing” meant “build no project.” The other developers at the meeting agreed.

3. For many years the Victoria Transport Policy Institute (VTPI) has been recognized as a source of reliable information on “Transportation Demand Management”, or TDM.


Even a relatively small parking fee can cause significant travel impacts and provide significant TDM benefits.

“TDM Benefits” refers to the many public and private benefits of having fewer people choosing to drive.
Current, Best-Practice “Unbundling”

The “best-practice” use of the phrase, “unbundled parking cost”, is to describe the case where either the cost of parking, for the case of a condominium, or the rent for parking, for the case of an apartment, is separated from either the purchase price and common fees or the rent of the dwelling unit.

This gives the resident families the choice of selecting the number of parking spaces they would like to rent or buy, including the choice of zero. This would tend to reduce the average number of cars owned per dwelling unit and, in this way, would also tend to reduce driving. Its major drawback is that this method does not encourage sharing.

To Increase Fairness and Protect the US Economy

It is stated above that almost all employees in San Diego County “park for free”. Of course there is really no such thing as “parking for free”. So-called “free parking” always reduces wages or increases costs. At a work site, it reduces everyone’s wage, even those employees that never drive. At an apartment complex, so-called “free parking” increases the rent. Therefore, “free parking” at work or at apartments violates the fundamental rule of the free market, which is that people should pay for what they use and not be forced to pay for what they do not use. Parking should at least be priced to achieve fairness to non-drivers.

The US economy would also benefit. Reductions in driving would lead to reductions in oil imports, which would reduce the US trade deficit.4

BARRIERS TO PROGRESS

Given all this, it might seem that the widespread pricing of parking should have happened by now. However there are barriers. In 2007, a majority of the City Council of Cupertino, CA. indicated that they wanted their City Manager to negotiate reduced parking requirements with any company that would agree to pay sufficient cash-out payments. To this date, no company, including Apple Inc., has expressed an interest. Most companies probably perceive cash-out as expensive. Even if they realize they could get a reduced parking requirement in exchange for paying sufficient cash-out amounts and even if the economics worked in support of this action (quite possible where land is expensive), they want to stay focused on their core business, instead of getting involved in new approaches to parking, real estate, and redevelopment.

On the other hand, simply charging for parking and then giving all the employees a pay raise is probably going to run into opposition from the employees, who will feel that they would be losing a useful benefit.

In addition, neighbors fear the intrusion of parked cars on their streets. Permit parking, which could offer protection, is not always embraced. City Council members know that a sizable fraction of voting citizens believe that there can actually never be too much “free parking”,

---

4 From http://en.wikipedia.org/wiki/Balance_of_trade#Warren_Buffett_on_trade_deficits. Warren Buffett wrote in 2006, “The U.S. trade deficit is a bigger threat to the domestic economy than either the federal budget deficit or consumer debt and could lead to political turmoil. Right now, the rest of the world owns $3 trillion more of us than we own of them.”
Professor Shoup’s famous book\(^5\) notwithstanding. Some Council members probably feel that way themselves.

It doesn’t help that current methods of charging for downtown parking are often very inefficient.\(^5\) For example, downtown Oceanside, California has parking meters that will only accept coins. Besides this, all their on-street, downtown parking is timed, with maximums from 10 minutes to 4 hours. These time limits are enforced by a city employee, who applies chalk from a tire to the street and then records the time. However, by watching the time and moving their car soon enough, drivers can avoid getting a ticket. Of course, they could instead drive to the mall and not have to worry about having coins or elapsed time since parking. It is not surprising that downtown merchants often object to charging for parking.

In summary, those that resist charging for parking, based on their perceptions, include

- Companies, who fear the complexity and expense of paying cash-out payments;
- Employees, who fear of losing a current benefit;
- City leaders, who fear the political repercussions;
- Downtown patrons, who dislike the inconvenience and worry;
- Downtown business owners, who fear that it will drive away customers.

THE COST, VALUE, AND FAIR PRICE OF PARKING

Estimated and Actual Capital Cost

**Surface Parking**

One acre of surface parking will accommodate 120 cars. Land zoned for mixed use is sometimes expensive. At $1.2 million per acre, the land for a single parking space costs $10,000. Construction cost should be added to this to get the actual, as-built cost of each parking space. Estimated cost can be determined by using appraised land value and construction estimates. For new developments, after the parking is constructed, it is important to note the actual, as-built cost.

**Parking-Garage Parking**

One acre of parking-garage will accommodate considerably more than 120 cars. The construction cost of the garage and the value of its land can be added together to get the total cost. Dividing that total cost by the number of parking spaces yields the total, as-built cost of each parking space. Adding levels to a parking garage may seem like a way to cut the cost of each parking space, for the case of expensive land. However, there is a limit to the usefulness of this strategy because the taller the parking garage, the more massive the supporting structural members must be on the lower levels, which increases total cost. Parking-garage parking spaces are often said to cost between $20,000 and $40,000. The actual costs should be noted.

**Underground Parking**

In order to compute an estimate for the cost of a parking space that is under a building, it is necessary to get an estimate of the building cost with and without the underground parking. The difference, divided by the number of parking spaces, yields the cost of each parking space. The

---

\(^5\) According to Bern Grush, Chief Scientist of Skymeter Corporation [http://www.skymetercorp.com/cms/index.php](http://www.skymetercorp.com/cms/index.php), often two-thirds of the money collected from parking meters is used for collection and enforcement costs.
cost or value of land plays no role in the cost of this parking. However, it does not follow that this parking is cheap. Underground parking spaces are often said to cost between $60,000 and $90,000 dollars each. Although there will be an “as built” cost of the building with the parking, there will never be an “as built” cost of the building without the parking. However, after the construction is done, the estimate for the cost of the underground parking should be reconsidered and re-estimated if that is needed. The final, best-estimate cost should be noted.

**Value**

Initially, value and cost are the same. For surface parking and parking-garage parking, the value would initially be the same as the as-built cost. For underground parking, the value would initially be the same as the best-estimate cost. However, over time, the value must be updated. Both construction costs and land-value costs will change. The value assigned to a parking place should always be based on the current conditions.

**Fair Pricing**

Parking space “values”, as described above, must first be converted to a yearly price by using a reasonable conversion factor. This conversion factor could be based on either the “cost of money” or the “earnings potential of money”. It is expected that this conversion factor would be 2% to 5% during times of low interest rates and slow growth; but could be over 10% during times of high-interest and high growth. For example, if the surface parking value is $12,000 and it is agreed upon to use 5% as the conversion factor, then each parking spot should generate $600 per year, just to cover capital costs. The amount needed for operations, collection, maintenance, depreciation, and any special applicable tax is then added to the amount that covers capital cost. This sum is the amount that needs to be generated in a year, by the parking space.

The yearly amount of money to cover capital cost needs to be re-calculated every year or so, since both the value and the conversion factor will, in general, change each year. The cost of operations, collection, maintenance, depreciation, and any special applicable tax will also need to be reconsidered.

Once the amount generated per year is known, the base price, per unit year, can be computed by dividing it (the amount generated per year) by the estimated fraction of time that the space will be occupied, over a year. For example, if a parking space needs to generate $900 per year but it will only be occupied 50% of the time, the time rate charge is $1800 per year. This charge rate per year can then be converted to an hourly or even a per-minute rate. The estimated fraction of time that the parking is occupied over a year will need to be reconsidered at least yearly.

**NEW DEFINITIONS TO PROMOTE AN OBJECTIVE VIEW OF PRICING**

- The “fair price” means the price that accounts for all costs.
- The “baseline amount of driving” means the driving that results from the application of the fair price.
- “Zero transportation demand management” (“zero TDM”) is the amount of demand management that results when the fair price is used. It will result in the baseline amount of driving.
- “Negative TDM” refers to the case where the price is set below the fair price. This will cause driving to exceed the baseline amount. Since TDM is commonly thought to be an action that reduces driving, it follows that negative TDM would have the opposite effect.
- “Positive TDM” refers to the case where the price is set above the fair price. This would cause the amount of driving to fall below the baseline amount.
Clearly, so-called “free parking” is an extreme case of negative TDM. The only way to further encourage driving would be to have a system that pays a driver for the time their car is parked.

**THE GOALS OF INTELLIGENT PARKING**

- There is only one agency operating all parking. (“All parking” does not include driveways and garages in single-family homes.) Intelligent Parking is designed and installed by regional or state government, using low-bid contractors, with design and start-up costs covered by the overhead portion of collection fees.

- Nearly all parking is shared. Almost always, anyone can park anywhere. Those who want exclusive rights to parking will pay “24/7” (all day, every day).

- Parking is operated so that the potential users of parking will escape the expense of parking by choosing to not use the parking. This characteristic is named “unbundled” because the cost of parking is effectively unbundled from other costs.

- Parking is priced and marketed to eliminate the need to drive around looking for parking.

- Parking at any desired price is made as easy as possible to find and use.

- Records of the use of each parking space are kept, to facilitate decisions to either add or subtract parking spaces.

- The special needs of disabled drivers, the privacy of all drivers, and, if desired, the economic interests of low-income drivers are protected.

**DEFINITIONS & CONCEPTS OF INTELLIGENT PARKING**

Parking Beneficiary Groups

There are at least 7 types of beneficiary groups. Note that in all cases, members of beneficiary groups must be old enough to drive.

1.) People who have already paid for the capital cost of parking. An example of this type of beneficiary group would be the owners of condominiums, where parking has been built and the cost is included in the price of the condominium. Note that although they have technically already paid for the parking, if they borrowed money to pay for some portion of the price, the cost is built into their monthly payment. This illustrates why the value of parking and the cost of borrowing money (rate of return on money) are key input variables to use to compute the appropriate base, hourly charge for parking.

2.) People who are incurring on-going costs of parking. An example of this type of beneficiary group is a set of office workers, where the cost of “their” parking is contained in either the building lease or the cost of the building. Either way, the parking costs are reducing the wages that can be paid to these employees.\(^6\)

3.) People who are purchasing or renting something where the cost of the parking is included in the price. Examples of this beneficiary group are people that rent hotel rooms, rent an apartment, buy items, or dine in establishments that have parking

---

\(^6\) Such parking is often said to be “for the benefit of the employees”. Defining this beneficiary group will tend to make this statement true, as opposed to the common situation where the employees benefit only in proportion to their use of the parking.
4.) People who own off-street parking as a business. They could be the individual investors or could be a government or government-formed entity.

5.) People who are said to benefit from parking, even though the money for the parking has been supplied by a source that may have very little relationship to those that are said to benefit. An example of this group would be train riders that make round trips from a station which has parking that is said to be “for riders”. Students at a school with parking would be another example.

6.) People who are considered by many to be the logical beneficiaries of on-street parking. Owners of single-family homes are the beneficiaries of the parking that is along the boundaries of their property. The same status is given to residents of multi-family housing.

7.) Governments. Since they build and maintain the streets, they should get a significant benefit from on-street parking.

Unbundled Cost and Spontaneous Sharing

“Unbundled cost” means those who use the parking can see exactly what it costs and those who don’t use the parking will either avoid its cost entirely or will get earnings to make up for the hidden parking cost they had to pay. This conforms to the usual rule of the free market where a person only pays for what they choose to use. Unbundled cost is fair.

“Spontaneous sharing” means that anyone can park anywhere at any time and for any length of time. Proper pricing makes this feasible.

How to Unbundle

The method of unbundling can be simply stated, using the concept of “beneficiary group” as discussed above. First, the fair price for the parking is charged. The resulting earnings amount is given to the members of the beneficiary group in a manner that is fair to each member. Methods are described below.

Why this Supports Sharing

Members of a beneficiary group benefit financially when “their” parking is used. They will appreciate users increasing their earnings. They are also not obligated to park in “their” parking. If there is less-expensive parking within a reasonable distance, they might park there, to save money. This is fine, because all parking is included in the Intelligent Parking system.

Computing the Earnings for Individuals

Intelligent Parking must be rigorous in paying out earnings. For a mixed use, the total number of parking spaces must first be allocated to the various beneficiary groups. For example in an office/housing complex, 63.5% of the parking might have been sold with the office. If so, the housing portion must be paying for the other 36.5%. For this case, it would follow that the first step is to allocate 63.5% of the earnings to the workers and 36.5% to the residents.

---

The earnings amount is the revenue collected minus the collection cost and any other costs that will have to be paid due to the implementation of Intelligent Parking. The costs associated with the parking, paid before the implementation of Intelligent Parking, should not be subtracted from the revenue because they will continue to be paid as they were before the implementation of Intelligent Parking. Therefore, these costs will continue to reduce wages and increase the prices of goods and services.
How the monthly earnings are divided up among the members of the beneficiary group depends on the beneficiary group type. For each member, the group’s total monthly earnings amount is always multiplied by a quantity and divided by the sum (the sum is the denominator) of that quantity, for all members.

For example, for each employee, the multiplier is the number of hours that the employee worked over the month while the denominator is the total number of hours worked by all employees over the month. At a school, for each student, the numerator is the total time spent at the school, over the month, while the denominator is the sum of the same quantity, for all the students.

For a train station with parking being supplied for passengers that ride on round trips of one day or less, the numerator is the passenger’s monthly hours spent on such round trips, over the month; while the denominator is the total number of hours spent by all passengers on such round trips, over the month. Radio Frequency Identification (RFID) units on passengers could support an automated calculation of monthly charges for fares, as well as monthly hours on round trips.

At a shopping center, the numerator is the sum of the money spent by the shopper, over the month, while the denominator is the total amount of money spent by all shoppers over the month.

At a condominium, the numerator is the number of parking places that were paid for (directly or indirectly) by the resident family and the denominator is the total number of parking places at the condominium project, similarly, for apartment complexes.

**Where Earnings Are Low**

The goal is that if someone doesn’t park, they don’t pay, either directly or indirectly, because the earnings that they get will balance out their losses (like reduced wages, for example). However, charging for parking that few want to use will not sufficiently compensate the people that have been forced, or are being forced, to pay for such parking. The only remedy in this case is to redevelop the parking or lease the parking in some other way, for storage, for example. The earnings from the new use should go to those that are in the beneficiary group that was associated with the low-performing parking.

**Why This Method of Unbundling Will Feel Familiar to Leaders**

Developers will still be required to provide parking and will still pass this cost on, as has been discussed. There will be no need to force an owner of an exiting office with parking to break his single business into two separate businesses (office and parking).

Parking beneficiaries are identified that conform to traditional ideas about who should benefit from parking.  

**Unbundling the Cost of On-Street Parking**

The revenue from on-street parking in front of businesses will be split evenly between the city and the business’s parking beneficiaries. All of the earnings from on-street parking in front of apartments or single-family homes will be given to the resident families.

---

8 Showing exactly where parking earnings go will reduce the political difficulties of adopting pay parking in a democracy where the high cost of parking is often hidden and rarely discussed.

9 Although governments own the streets, often, back in history, developers paid for them and this cost became embedded in property values. Admittedly, how to allocate on-street parking earnings is somewhat arbitrary. With
Special Considerations for Condominiums

Unbundling for a condominium owner means that, although their allocated amount of parking has added to their initial cost, their allocated amount of parking also earns money for them. Unbundling for a condominium could also mean that an owner can choose to have control over a single or several parking places. Such parking spaces could be equipped with a red light and a green light. If the red light is lit, this will mean that the space is not available for parking, except for the person who is controlling the spot. If the green light is lit, it will mean that the space is available to anyone. A space that is being reserved with a red light is charged at the full price to the condominium owner that has control over the space. The owner that controls these spaces can change the state of the parking space (available or not available) by either a phone call, on line, or at any pay station system that might be in use for the system. After condominium owners experience the cost of reserving a space for themselves, they might give up on the idea of having their own, personal, unshared parking space; especially since Intelligent Parking will give most owners and their guests all the flexibility they need in terms of parking their cars.

Some people think that condominium parking should be gated, for security reasons. However, parking within parking garages needs to be patrolled at the same frequency level as on-street parking, which is enough to ensure that crime around either type of parking is very rare. Cameras can help make parking garages that are open to the public safe from criminal activity.

Special Considerations for Renters

Unbundling for renters means that, although their allocated amount of parking increases their rent, their allocated amount of parking also earns money for them. Therefore, their traditional rent (includes parking) is effectively reduced by the money earned by those parking spaces allocated to them. Renters will be motivated to either not own a car or to park in a cheaper location. Parking in a cheaper location is not a problem because all parking is part of the Intelligent Parking system. Renters will welcome anyone to park in “their” parking, because it will increase their earnings.

Special Considerations for Employers

At first, companies may want the option of offering “free parking” to their employees so as to be able to compete with traditional job sites. This means giving employees that drive every single day an “add-in” amount of pay so that the sum of the add-in and their parking-lot earnings equals their charge, for any given monthly statement. The operator of the parking, which sends out statements, can pay out the “add in” amount, in accordance with the company’s instruction. The company will then be billed for these amounts. There could be no requirement for the company to provide any such “add-in” amount to the employees that don’t drive every day. This would allow the company to treat its every-day drivers better than other employees and so this would be a negative TDM. However, this economic discrimination would be substantially less than the current, status-quo, economic discrimination, where drivers get “free” parking and non-drivers get nothing.

Clusters of Parking

Clusters are a contiguous set of parking spaces that are nearly equal in desirability and thus can be assigned the same price. They should probably consist of from 20 to 40 spaces. For off-street congestion pricing and efficient methods, governments may earn significantly more than they are under current practices.
parking, they could be on either side of the access lane to the parking spaces, so that an observer could see the 20 to 40 cars, and get a feel for the vacancy rate. At a train station, clusters will normally be organized so that their parking spaces are approximately an equal distance from the boarding area. On-street clusters would normally conform to our current understanding of what a block is, which is to say from one cross street to the next cross street. The width of the street and the length of the block should be taken into account in defining on-street clusters of parking and in deciding if the parking on either side of the street should or should not be in the same cluster of parking spaces.

Examples of Good and Bad Technology

Parking Meters or Pay Stations

Parking meters are a relic of an earlier period, before computers. Pay stations do not add enough usefulness to merit their inclusion in Intelligent Parking, except as a bridge technology. Once good systems are set up, pay stations should cost additional money to use because of their expense. It would be best to devise an implementation strategy that will minimize their use when the system is first put into effect and will take them out of service as soon as possible.

Radio Frequency Identification Backed Up by Video-Based “Car Present” and License Recognition

Government will eventually enter into an RFID (Radio Frequency Identification) age. Organizers of large athletic events already have. Organizers that put on large open-water swims, foot races, and bike rides have routinely used RFID for many years. An RFID vendor in San Diego states that passive RFID units cost less than $5, are reliable, are durable, and they could be used to identify cars as well as people. He also sees no problem in implementing most of the features of Intelligent Parking.

Automatic Data Collection and Sending Out Statements

Note that the “back end database” of Dr. Carta’s written statement refers to the ability to send statements of earnings and billing to students.

---

10 For example, over 20,000 people ran the 2008 Bay-to-Breakers foot race in San Francisco. Each runner had a “chip” in their shoe lace. Each runner’s start time and finish time were recorded and all results were available as soon as the last runner crossed the finish line.

11 David R. Carta, PhD, CEO Telaeris Inc., 858-449-3454

12 Concerning a Final Environmental Impact Report-approved and funded new high school in Carlsbad, California, where the School Board has signed a Settlement Agreement to consider “unbundled parking”, “cash-out”, and “pricing”. Dr. Carta wrote, in a January 15th, 2010 written statement to the Board,

I wanted to send a quick note discussing the technical feasibility of tracking cars into a lot without impacting students or requiring the need for gates. Mike Bullock and I have discussed this project; it can be accomplished straightforwardly by utilizing Radio Frequency Identification and/or Video Cameras integrated with automated license recognition systems. The cars would need to register with the system at the start, but it would be fairly painless for the users after the initial installation. The back end database system can also be implemented both straightforwardly and at a reasonable price.

This is not necessarily a recommendation of the proposal for unbundled parking. Rather it is strictly an unbiased view of the technical feasibility of the proposal to easily and unobtrusively track cars, both registered and unregistered, into a fixed lot.

13 In an earlier email on this subject, Dr. Carta wrote.
Putting it Together

Certainly, government, and in particular transit agencies and parking agencies, could use RFID-based technology. For example, when a person with an RFID unit which is tied to a billable address or a credit card with an open account gets on a bus or a train, they should not have to pay at that time, visit a pay station, or “swipe a card” that has a positive balance. Utility customers that pay their bills are not required to pre-pay. The same courtesy should be extended to transit riders, people that drive on roads, people that get parking-lot earnings, and people that park cars. There should be one monthly bill or statement, for all four activities.

Global Positioning Systems GPS

An alternative model is to have GPS systems in cars that would detect the car’s parking location, that location’s current charge rate, and would perform all of the charging functions in the car. The only information the parking-lot-enforcement system would need is whether or not a car being parked is owned by a bill-paying owner. The car owner’s responsibility would be to pay the bills indicated by the box in the car. The box would need to process a signal that a bill had been paid. It would also need to process pricing signals.

Not Picking Winners

The purpose of this report is to describe what an ideal system would do, not how it is done. How a proposed system works is left to the systems, software, and hardware engineers that work together to submit a proposal based on this description of what an ideal system does.

Privacy

Privacy means that no one can see where someone has parked, without a search warrant. Also, the level of the detail of information that appears on a bill is selected by the customer.¹⁴

Ease of Use for Drivers

For credit-worthy drivers that have followed the rules of the system, pay parking will not require any actions other than parking. Paying for all parking fees over a month is then done in response to a monthly billing statement. Parking will feel to the consumer like a service provided by a municipality, such as water, energy, or garbage. One important difference is that users belonging to a “beneficiary group” will get an earnings amount in their monthly statement. Those that earn more than what they are charged will receive a check for the difference. This ease of use will make all parking less stressful.

Base Price

Off-Street

---

¹⁴ License plates that have no RFID tags fail to use the best technology to accomplish the primary purpose of license plates, which is to identify and help intercept cars used in a crime. Identifying cars is a legitimate government goal. Protecting privacy is also a legitimate goal. Both goals can be realized with good laws, good enforcement, and good systems engineering.
Off-street parking is priced so that even if demand does not threaten to fill the parking beyond 85%, the money generated will at least equate to an agreed-upon return on the parking value and pay all yearly costs. Equation 1 shows the calculation of the hourly rate.

\[
\tau_{\text{Baseline Hourly}} = \frac{(\eta^{\text{Investment}} \times v^{\text{Parking}}) + c^{\text{YOPD}}}{(n^{\text{Hours Per Year}} \times f^{TO})}
\]  
(Eq. 1)

where:

- \(\tau_{\text{Baseline Hourly}}\) — the computed baseline hourly rate to park
- \(\eta^{\text{Investment}}\) — yearly return on investment, such as .06
- \(v^{\text{Parking}}\) — value of a parking space, such as (parking garage) $40,000
- \(c^{\text{YOPD}}\) — yearly operations\(^{15}\) plus depreciation, per space, such as $100
- \(n^{\text{Hours Per Year}}\) — number of hours per year. 24 x 365 = 8760 Hours per Year
- \(f^{TO}\) — fraction of time occupied, such as 0.55.

For the example values given, the base hourly rate of parking, to cover the cost of the investment, operations\(^{15}\), and depreciation is $0.519 per hour. This could be rounded up to $0.52 per hour. This price could also be increased to result in positive TDM, to reduce driving more than the fair-price, zero-TDM amount.

**On-Street**

If on-street parking is located within walking distance (one-quarter mile) of off-street parking, its base price is set equal to the closest off-street parking’s base price. Otherwise, it is set to some agreed-upon value, like fifty cents per hour. However, on-street parking has a special meaning for downtown merchants and for neighborhoods, two powerful political forces in any city. Merchants that have few cars parking on their street, even though it is permitted, are probably failing in their businesses. They would like free parking to help draw visitors to their store front. Neighborhoods that are not impacted by parking would probably prefer no pricing. For these reasons, for any on-street parking cluster, no price is charged until the cluster occupancy reaches 50%. (Time of day is irrelevant.)

**Congestion Pricing**

The time-rate price of parking is dynamically set on each cluster of parking, to prevent the occupancy rate from exceeding 85% (to reduce the need to drive around looking for parking). An 85% occupancy rate (15% vacancy) results in just over one vacant parking space per city block\(^{5}\). If the vacancy rate is above 30%, the price is left at the baseline hourly rate. If vacancies fall below 30%, the price can be calculated in a stair-step method, such as shown in Table 2.

Equation 2 is an alternative method.

In either case, the total charge is time parked, multiplied by the time-averaged, time-rate price. The base multiplier would be adjusted to be just large enough to keep the vacancy rate from falling below a desired level, such as 15%, so it is always easy to find parking.

---

\(^{15}\) This includes money for policing, cleaning, maintenance, any applicable parking tax, and all collection costs. Collection costs will need to include an amount to recover the development and installation costs of Intelligent Parking.
Table 2  Hourly Rates for 2 Base Multipliers and a Baseline Hourly Rate of $0.52

<table>
<thead>
<tr>
<th>Vacancy Rate</th>
<th>Base Multiplier = 2</th>
<th>Base Multiplier = 2.5</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Multiplication</td>
<td>Hourly Rate</td>
</tr>
<tr>
<td></td>
<td>Formula</td>
<td>Value</td>
</tr>
<tr>
<td>Above 30%</td>
<td>$2^0</td>
<td>1</td>
</tr>
<tr>
<td>25% to 30%</td>
<td>$2^1</td>
<td>2</td>
</tr>
<tr>
<td>20% to 25%</td>
<td>$2^2</td>
<td>4</td>
</tr>
<tr>
<td>15% to 20%</td>
<td>$2^3</td>
<td>8</td>
</tr>
<tr>
<td>10% to 15%</td>
<td>$2^4</td>
<td>16</td>
</tr>
<tr>
<td>5% to 10%</td>
<td>$2^5</td>
<td>32</td>
</tr>
<tr>
<td>Below 5%</td>
<td>$2^6</td>
<td>64</td>
</tr>
</tbody>
</table>

$$r_{HourlyRate} = r_{BaselineHourly} \times (B^{(80-V)/5})$$, for $V < 30$; $r_{BaselineHourly}$, otherwise (Eq. 2)

where:

- $r_{HourlyRate}$ = the congestion-priced hourly rate to park
- $r_{BaselineHourly}$ = the baseline hourly rate to park, such as $0.52$ per hour (taken from Eq. 1).
- $B$ = the base of the multiplier being computed, such as 2.50
- $V$ = the vacancy rate percent, such as 17.5, for 7 vacancies in a cluster of 40 spaces, $100 \times (7/40) = 17.5$

For the example values given, the hourly rate of parking would be $9.88 per hour.

**Pricing Predictions and Notifications**

Drivers will develop strategies for their routine trips. The computer system that keeps records of parking use will also provide help for users. The *Intelligent Parking* website will direct a user to an appropriate cluster of parking if the user provides the destination location or locations, the time and date, and the hourly rate they wish to pay. If the walk is going to be long, the website could suggest using transit to get from the cheaply-priced parking to the destination. In such cases, the website may also suggest using transit for the entire trip.

Another user option is to specify the time, location, and the distance the user is willing to walk. In this case, the computer would give the cheapest cluster of parking available at the specified walk distance. The price prediction would be provided.

All price predictions would also have a probability of correctness associated with them. If a user can show that a computer has predicted a much lower price than what actually occurred, with a sufficiently high probability, it would be reasonable to charge the user the predicted price rather than the actual price.

Websites could routinely inform viewers when occupancy rates are expected to be unusually high, due to a special event (for example, a sporting event). The parking system website will always give current and predicted hourly rates for all locations. The hourly rates of parking will
also be available at a phone number and possibly at pay stations. The base-price hourly rate, for any parking cluster, would be stable and could therefore be shown on signs. Parking garage entrances could have large video screens showing both predicted and existing price. Users will also learn to look at parking and judge whether congestion pricing applies, or could apply, while their car is parked. It would not be long before these capabilities are added into GPS navigation systems.

**Prepaid RFID**

To be inclusive, pay stations or convenience stores will offer a pre-paid RFID that can be set on the dashboard of a car. This will support drivers with poor credit or drivers who have not obtained the necessary equipment to support the normal, trouble-free methods. This will also work for drivers that do not trust the system to protect their privacy for a certain trip (by removing or disabling the permanent RFID) or for all trips. No billing would occur.

**Enforcement**

The system would notify the appropriate law enforcement agency if an unauthorized car was parked. Authorized cars would need either a pre-paid RFID or equipment indicating that their owners had *Intelligent Parking* accounts and were sufficiently paid up on their bills.

**IMPLEMENTATION**

This description of *Intelligent Parking* will help to implement efficient parking systems. Parking at train stations, schools, and government buildings could introduce many of these concepts. This description of *Intelligent Parking* is sufficient to support a “Request for Proposal” process, which could lead to full implementation. Widespread installation should be done by a government agency, to minimize actions required on the part of the private sector. Laws would simply require the cooperation of all private-sector and government entities.

**SUMMARY**

A parking plan, *Intelligent Parking* has been described.

1. Technology will make it easy to use for most drivers.
2. Its parking is almost always shared, to support mixed uses.
3. It unbundles cost by charging and having earnings go to the parking beneficiaries.
4. Traditional groups, such as single-family home owners, employees, tenants, train riders, and students benefit from parking. The benefit is equal for drivers and non-drivers.
5. Baseline prices are computed primarily from the value of the parking and an agreed-upon rate of return. On-street parking is free until it is half full, at which time its base price often matches that of the closest off-street parking.
6. For all parking, price is dynamically increased to guarantee availability. Earnings are therefore only limited by what people are willing to pay.
7. Technology helps drivers find parking and decide if they want to drive or use transit.
8. Prepaid RFIDs provide service to those who have poor credit or don’t want to be billed.
9. Disabled and perhaps low-income drivers will have accounts that allow them to park at reduced prices and perhaps avoid congestion pricing. Specially designated spots might also be required for disabled drivers.
10. The system will provide reports showing where additional parking would be a good investment and where it would be wise to convert existing parking to some other use.

11. Privacy will be protected. Law enforcement officials would need a search warrant to see where someone’s car has been parked. The level of detail on billing would be selected by the car’s owner.

12. Implementations could begin in carefully selected locations and expand.

Global warming, air pollution, trade deficits, and fairness are some of the significant reasons that governments have a responsibility to implement Intelligent Parking.

ACKNOWLEDGEMENTS

The following people have offered encouragement, specific information, and/or special insights.

Dr. Dennis Martinek, Oceanside Planning Commissioner; Sandra Goldberg, California Deputy Attorney General; Jerry Kern, Oceanside, City Council; Amy Volzke, Principal Planner, City of Oceanside; Dr. Nilmini Silva-Send, Senior Policy Analyst of the Energy Policy Initiative Center; Diane Nygaard, Director of Preserve Calavera and founder of Nelson Nygaard, Consulting Associates; Lisa Rodman, Trustee, Carlsbad Unified School District; Dr. Michael McQuary, President, La Jolla Democratic Club; Joan Bullock, Judy Jones, San Diego County Central Committee, California Democratic Party; Patrick Siegman, Principal and Shareholder, Nelson Nygaard; Andy Hamilton, San Diego Air Pollution Control District, Renee Owens, Conservation Chair, San Diego Sierra Club; Caroline Chase, Executive Committee Chair, San Diego Sierra Club; Ed Mainland, Co-Chair, Energy-Climate Committee, Sierra Club California; Bern Grush, Chief Scientist, Skymeter Corporation; and the following San Diego Area Government (SANDAG) employees: Susan Baldwin, Senior Regional Planner; Bob Leiter, former Director of Land Use and Transportation Planning; Coleen Clementson, Principle Planner, and Stephan Vance, Senior Regional Planner.

REFERENCES


KEYWORDS

A&WMA, Parking, Unbundled, Shared, TDM, cash-out, pricing, beneficiary, greenhouse gas, GHG, GPS, RFID
Response to Comment P2-1
This comment addresses a variety of issues including the LUCE Update process, requests to provide additional mitigation measures that address Class I and other impacts identified by the Draft EIR, and the protection of the environment. These comments generally express the opinions of the commenter and do not address specific items or details associated with the information or environmental impact analysis provided by the Draft EIR. Although the information provided by this comment does not specifically address the adequacy of the environmental impact analysis provided by the Draft EIR, the comment has been noted in Appendix of the Final EIR and will be provided to the Planning Commission and City Council for consideration in the decision-making process.

Please also refer to Master Response #1, Comments Specific to the LUCE Update Concepts and/or Policies; and Master Response #2 Programmatic Nature of the EIR.

Response to Comment P2-2
The comment supports adoption of 6.3-Reduced Development Alternative based on a summary of traffic and air quality impacts. This comment provides a general opinion. Although the information provided by this comment does not pertain to the adequacy of the environmental impact analysis provided in the Draft EIR, the comment has been noted and will be provided to the Planning Commission and City Council for consideration in the decision making process. The comment also suggests that none of the existing policies, standards, or specific plans are sufficient to deal with the current magnitude of climate instability. The Climate Action Plan (CAP) includes a communitywide GHG emissions reduction target of 15 percent below 2005 levels by 2020. The CAP includes specific GHG reduction measures that are designed to achieve this target, in combination with state and federal legislative reductions. Communitywide emissions would be reduced to 16 percent below 2005 levels by the year 2020, exceeding the 15 percent target. The CAP also shows projections and reductions beyond 2020 to the year 2035. The Draft EIR concludes that the proposed LUCE Update is consistent with the adopted CAP. Currently, AB 32, the Global Warming Solutions Act of 2006, is the only law, as an assembly bill is defined as a bill that is proposed as law under consideration by a legislature, which defines GHG reductions for California (e.g., reduce emissions to 1990 levels by 2020). Other goals have been identified (e.g., 80% below 1990 levels 2050), but not with the same legal authority as the contents of AB 32. Thus, the CAP and the Draft EIR discussion focus on 2020. That said, the City understands the need to look beyond 2020 and; thus, projections and reductions were developed for 2035. In addition, in compliance with the CEQA Guidelines definition of a qualified CAP, the City will revisit and update this work as needed with implementation, progress update, and monitoring activities occur.

Response to Comment P2-3
The comment suggests adding a reference to Executive Order (EO) S-3-05 in the regulatory setting to support the addition of more GHG reduction measures to stay on track with reducing emissions 80% below 1990 levels by 2050. The regulatory setting of Section 4.7 Global Climate Change in the Draft EIR summarizes the key findings from the Background Report and states to refer to Section 6.7 of the Background Report for detailed information. The Background Report for Global Climate Change contains a description of EO S-3-05, which as mentioned above is referred to in the Draft EIR regulatory setting for Section 4.7 Global Climate Change and; thus, it is already inherently included. Also, please refer to response to comment P2-2. Overall, although the information provided by this comment does not pertain to the adequacy of the environmental impact analysis provided in the Draft EIR, the comment has been noted and will be provided to the Planning Commission and City Council for consideration in the decision making process.

Response to Comment P2-4
This comment serves as an introduction to more specific comments (comments P2-5 through P2-18) provided below.

Please refer to responses P2-5 through P2-18 and Master Response #1, Comments Specific to the LUCE Update Concepts and/or Policies.
Response to Comment P2-5
This comment provides suggestions for the revision of or edits to the proposed Land Use Element policy related to tourism. Although the information provided by this comment does not pertain to the adequacy of the environmental impact analysis provided by the Draft EIR, the comment has been noted in Appendix of the Final EIR and will be provided to the Planning Commission and City Council for consideration in the decision making process.

Please also refer to Master Response #1, Comments Specific to the LUCE Update Concepts and/or Policies.

Response to Comment P2-6
This comment provides suggestions for the revision of or edits to the proposed LUCE Update as it relates to implementation of the Economic Development Strategic Plan. Although the information provided by this comment does not pertain to the adequacy of the environmental impact analysis provided by the Draft EIR, the comment has been noted in Appendix of the Final EIR and will be provided to the Planning Commission and City Council for consideration in the decision making process.

Please also refer to Master Response #1, Comments Specific to the LUCE Update Concepts and/or Policies.

Response to Comment P2-7
This comment provides suggestions for the revision of or edits to the proposed LUCE Update as it relates to rainwater percolation. Although the information provided by this comment does not pertain to the adequacy of the environmental impact analysis provided by the Draft EIR, the comment has been noted in Appendix of the Final EIR and will be provided to the Planning Commission and City Council for consideration in the decision making process.

Please also refer to Master Response #1, Comments Specific to the LUCE Update Concepts and/or Policies.

Response to Comment P2-8
This comment provides suggestions for the revision of or edits to the proposed LUCE Update as it relates to drainage concentrations and impervious coverage. Although the information provided by this comment does not pertain to the adequacy of the environmental impact analysis provided by the Draft EIR, the comment has been noted in Appendix of the Final EIR and will be provided to the Planning Commission and City Council for consideration in the decision making process.

Please also refer to Master Response #1, Comments Specific to the LUCE Update Concepts and/or Policies.

Response to Comment P2-9
This comment provides suggestions for the revision of or edits to the proposed LUCE Update as it relates to citation of existing ordinances, standards, and specific plans. Although the information provided by this comment does not pertain to the adequacy of the environmental impact analysis provided by the Draft EIR, the comment has been noted in Appendix of the Final EIR and will be provided to the Planning Commission and City Council for consideration in the decision making process.

Please also refer to Master Response #1, Comments Specific to the LUCE Update Concepts and/or Policies.

Response to Comment P2-10
This comment provides suggestions for the revision of or edits to the proposed LUCE Update as it relates to offsite mitigation. Although the information provided by this comment does not pertain to the adequacy of the environmental impact analysis provided by the Draft EIR, the comment has been noted in Appendix of the Final EIR and will be provided to the Planning Commission and City Council for consideration in the decision making process.

Please also refer to Master Response #1, Comments Specific to the LUCE Update Concepts and/or Policies.
Response to Comment P2-11
This comment provides suggestions for the revision of or edits to the proposed LUCE Update as it relates to water recycling systems. Although the information provided by this comment does not pertain to the adequacy of the environmental impact analysis provided by the Draft EIR, the comment has been noted in Appendix of the Final EIR and will be provided to the Planning Commission and City Council for consideration in the decision making process.
Please also refer to Master Response #1, Comments Specific to the LUCE Update Concepts and/or Policies.

Response to Comment P2-12
This comment provides suggestions for the revision of or edits to the proposed LUCE Update as it relates to the development and use of alternative fuels. Although the information provided by this comment does not pertain to the adequacy of the environmental impact analysis provided by the Draft EIR, the comment has been noted in Appendix of the Final EIR and will be provided to the Planning Commission and City Council for consideration in the decision making process.
Please also refer to Master Response #1, Comments Specific to the LUCE Update Concepts and/or Policies.

Response to Comment P2-13
This comment provides suggestions for the revision of or edits to the proposed LUCE Update as it relates to average vehicle ridership levels. Per SB 437 (Lewis), the language was removed because it is inconsistent with current State law (code 40717.9 in Health and Safety regulations). Although the information provided by this comment does not pertain to the adequacy of the environmental impact analysis provided by the Draft EIR, the comment has been noted in Appendix of the Final EIR and will be provided to the Planning Commission and City Council for consideration in the decision making process.
Please also refer to Master Response #1, Comments Specific to the LUCE Update Concepts and/or Policies.

Response to Comment P2-14
This comment provides suggestions for the revision of or edits to the proposed LUCE Update as it relates to public transit frequency. The City’s Mass Transit Committee recommended removal or revision to this statement to be more realistic. Transit service performance is based on achieving the performance metrics identified in the City’s Short Range Transit Plan. This plan is currently in the process of being updated. Although the information provided by this comment does not pertain to the adequacy of the environmental impact analysis provided by the Draft EIR, the comment has been noted in Appendix of the Final EIR and will be provided to the Planning Commission and City Council for consideration in the decision making process.
Please also refer to Master Response #1, Comments Specific to the LUCE Update Concepts and/or Policies.

Response to Comment P2-15
This comment provides suggestions for the revision of or edits to the proposed LUCE Update as it relates to development impact fees. The “fair share” language is retained in order to remain consistent with State law (AB 1600 and subsequent legislation as codified in Government Code Section 66000 et seq, “Mitigation Fee Act”). Although the information provided by this comment does not pertain to the adequacy of the environmental impact analysis provided by the Draft EIR, the comment has been noted in Appendix of the Final EIR and will be provided to the Planning Commission and City Council for consideration in the decision making process.
Please also refer to Master Response #1, Comments Specific to the LUCE Update Concepts and/or Policies.

Response to Comment P2-16
This comment provides suggestions for the revision of or edits to the proposed LUCE Update as it relates to development impact payments. The “fair share” language is retained in order to remain consistent with State law (AB 1600 and subsequent legislation as codified in Government Code Section 66000 et seq, “Mitigation Fee Act”). Although the information provided by this comment does not pertain to the adequacy of the environmental impact analysis provided by the Draft EIR, the comment has been noted in Appendix of the Final EIR and will be provided to the Planning Commission and City Council for consideration in the decision making process.
Please also refer to Master Response #1, Comments Specific to the LUCE Update Concepts and/or Policies.

Response to Comment P2-17
This comment provides suggestions for the revision of or edits to the proposed LUCE Update as it relates to complete streets. The complete streets concept is incorporated into the LUCE Update in Policy 6.0.1, Complete Streets, and Program 9.1.4, Conceptual Plan for the City’s Center. Although the information provided by this comment does not pertain to the adequacy of the environmental impact analysis provided by the Draft EIR, the comment has been noted in Appendix of the Final EIR and will be provided to the Planning Commission and City Council for consideration in the decision making process.

Please also refer to Master Response #1, Comments Specific to the LUCE Update Concepts and/or Policies.

Response to Comment P2-18
This comment provides suggestions for the revision of or edits to the proposed LUCE Update as it relates to unbundled parking. An unbundled parking policy was not part of the project description nor was it evaluated through the EIR process. Although the information provided by this comment does not pertain to the adequacy of the environmental impact analysis provided by the Draft EIR, the comment has been noted in Appendix of the Final EIR and will be provided to the Planning Commission and City Council for consideration in the decision making process.

Please also refer to Master Response #1, Comments Specific to the LUCE Update Concepts and/or Policies.

Response to Comment P2-19
Thank you for this clarification. Proposed new policy 16.0.6 has been corrected as follows in the Final EIR:

16.0.6 New Policy Distribution of Transportation Funding
The City shall encourage SLOCOG to consider initiating a county wide revenue measure devoted to local transportation funding on the basis of population, so that San Luis Obispo County becomes a “self help” county.

Response to Comment P2-20
This comment provides suggestions for the revision of or edits to the proposed LUCE Update as it relates to development impact payments. Although the information provided by this comment does not pertain to the adequacy of the environmental impact analysis provided by the Draft EIR, the comment has been noted in Appendix of the Final EIR and will be provided to the Planning Commission and City Council for consideration in the decision making process.

Please also refer to Master Response #1, Comments Specific to the LUCE Update Concepts and/or Policies.
Eugene Jud, CE (Europeanwide License FEANI #114892 ), Fellow Institute of Transportation Engineers (ITTE)
665 Leff St.
San Luis Obispo, CA 93401

Blayne Morgan, M.S. Civil Engineering
2108 Price St.
San Luis Obispo, CA 93401

July 28, 2014

Subject: Comments on SLO LUCE Draft Program EIR and Draft Land Use and Circulation Elements

Dear Kim,

We thank everybody who worked diligently on the above three documents. Much positive work has been done. We are glad to comment below, and we hope to explain more later on.

Our planning approach is mainly based on the memo of the SLO 2035/2050 Group “Revision of the SLO Land Use & Circulation Element 2035/2050” dated September 5, 2013, which was signed by 27 persons, some of them with Ph.Ds or MS in transportation. It is in the city records of fall 2013, and you find its short version in Appendix 1 of the attached document. The memo reflects our feelings about the urgency of the times - mainly irreversible climate change - and goes further than the current LUCE document, which appears to be guided by the slogan “Do Not Rock the Boat”. However we are thankful, that a few suggestions of our memo were heeded by LUCE or can later be put into practice under LUCE . Our impression in short: While the “Climate House” of the world is burning (climate change), LUCE appears to only sprinkle some drops of water into the fire!

Today San Luis Obispo is at a historical crossroad when defining livability. The SLO bans on smoking and drive-thru eateries of old are justly famous and demonstrate a strong public will towards health and enhanced aesthetics. The question is: How much economic and infrastructure development is now desirable and how much becomes counterproductive, environmentally and financially speaking? Are we highly innovative or will we lead SLO one more step towards “Anytown USA” with sprawling shopping centers and parking lots? We hope to contribute to an answer.

The class 1 impacts of the current LUCE proposal are obvious: unfortunately we are in dramatic violation of CEQA. It even gets worse, should the enormous Chevron Project on Tank Farm Road move forward in Fall. We may see a questionable “asphalt attack” on the city, also because of widespread widening of roads. The location of the project is such, that no efficient transit can be delivered to it.
Fortunately, some Class I impacts of transportation shown in the DEIR, mostly air pollution, can be mitigated much further than the DEIR preparers imagine, if the political will is as strong as it was in the past. This can happen through smart land use along the lines of the DEIR “Reduced Development Alternative”, through smart phasing of infrastructure and through dozens of highly effective transportation demand measures (TDM). These are not only applied worldwide, but they have already demonstrated success in San Luis Obispo:
- smart parking policies and free access passes for downtown employees
- South Street road diet
- Cal Poly’s dramatic reduction of vehicular traffic, even after buildings of several 100 million dollars were put into place
- Traffic reduction of seven percent during reconstruction of Highway 101 on the grade through use of additional buses.

In many cases well implemented TDM reduces vehicular traffic by up to 30 percent. Cal Poly students have made multiple proposals – mostly unnoticed by LUCE, but documented in city records over years. Unfortunately the DEIR is somehow “fatalistic” about TDM and possible alternative land use concepts of the city.

Fortunately there is an undisputed change in lifestyles happening in society: Younger and older people switch from the traditional car-oriented “American Dream” to a more frugal lifestyle. The “Live Light” movement is also strong in Germany and Switzerland, because of their upcoming energy shortage, since both countries have voted to shut down their atomic plants. The reduced auto use of the younger and older generation in USA will probably contribute to more livability, if road building is kept to a minimum. This is mandated by the Governor of California and his creative Office of Planning and Research (OPR). Their newest draft legislation is the upcoming SB 743, through which auto delay will no longer automatically have to be mitigated by road widening.

Times are changing, and we hope that the coming weeks lead to an inspiring and uplifting LUCE document, which effectively fights the fire in the "Climate House"!

Thankfully,

Eugene Jud  Blayne Morgan

---

Eugene Jud, Fellow Institute of Transportation Engineers ITE
Faculty Civil and Environmental Engineering
California Polytechnic State University
San Luis Obispo, CA 93407-0353
Phone: (805) 756-1729; E-mail: ejud@calpoly.edu
http://ceenve3.calpoly.edu/jud
Revision of SLO Land Use & Circulation Element 2035/2050

1. **The future is not what it used to be.** There is **dramatic change in behavior** regarding lifestyles of the younger generation and transportation.

   - Now 30% of people born between 1981-2000 who are of driving age do not have a driver’s license or vehicle. Many wish to not drive if possible. **This is the generation for whom LUCE must plan (makes up 50% of population).**
   - Despite economic growth, traffic volumes are now at 1995 levels in many locations.
   - Traffic growth could be anything from negative, flat, or positive (**Diagram 1**). This urgently mandates planning for **different scenarios**.

2. **Possible Planning Objectives and Priorities for LUCE**

   - **Objective #1:** *climate mitigation and introduction of complete streets* (Senate Bill 375).
   - **Objective #2:** *financial feasibility* for the city (low capital and operations cost).
   - **Objective #3:** keeping San Luis Obispo on the list of **highly innovative cities** (i.e. first city to ban smoking in public, ban drive thrus, and celebrate “Happiest City in North America”).

Therefore the below planning priorities according to the **existing SLO Circulation Element** (pg 2-11) must be applied in the following order of importance: **smart land use, pedestrians, bicycles, public transit, and cars** (**Diagram 2**).

2.1 **Land Use**

   - **Cannot be decided independently of transportation.** Traditionally, zoning used to be decided first, followed by a traffic study which determined the width of the roads. However, other cities have successfully implemented the **opposite method.** First, the acceptable width of main arterial roads was decided, followed by the zoning which is based on the acceptable vehicular trip generation along these roads (traffic overlay). Therefore, beware of heavy trip generators! Promote:
   - **Infill Development:** reduce distance to downtown.
   - **Deferred Infrastructure:** build minimum number of parking spaces first, save land for later expansion.
   - **Symmetry of Sacrifice:** reduce own vehicle miles traveled before expecting others to do so (measure it)

2.2 **Pedestrians**

   - **Create a pedestrian plan** for the whole city of San Luis Obispo and especially downtown by 2015.
   - Reach **silver level of “Walk Friendly City”** by 2020 (given by Walk Friendly Communities).
   - Plan the whole city according to the **“popsicle principle:”** safe for children to purchase a popsicle.
   - Build **pedestrian/bike connections independent of roads** between neighborhoods and downtown, as well as a **connection between the Orcutt area and the shopping centers on Los Osos Valley Road** using bridges over arterials roads and Highway 101.
   - Organize pedestrian only zones and **“shared zones,” which allow restricted traffic** as done overseas. San Luis Obispo could be the first shared zone west of the Mississippi.
   - **Do not be afraid of trial exercises,** such as closing Higuera Street downtown for more occasions than just Farmer’s Market.
2.3 Bicycles
- Reach gold level of “Bicycle Friendly City” by 2020 (given by the League of American of Bicyclists).
- Construct bicycle parking near building entrances (suggest and partially enforce).

2.4 Transit
- Operate most bus lines on 15 minute intervals by 2020 with service to the airport area.
- Consider a mini bus system that helps underserved neighborhoods.
- Implement preferential treatment for buses on streets and at signalized intersections.
- Consider an attractive future downtown transit, pedestrian, and bike plaza (Diagram 3).
- Consider light rail from Cal Poly to the uptown EcoZone, downtown, Marigold/airport, and southwards to Santa Maria and Santa Barbara with multiple stations.

2.5 Cars
- Give preference to persons with disabilities and others who do not have access to alternative modes.
- Give preference to delivery vehicles, especially the small freight vehicles in downtown.
- Forecast traffic scenarios according to newer demographic trends (radical change of input to traffic model).
- Make our traffic model and its input transparent to all citizens.
- Treat vehicular traffic performance (Level of Service, LOS) with more flexibility.
- Design according to multi modal LOS, which gives heavy weight on pedestrians, bicycles, and transit.
- Make alignment of roads sensitive to landscape, cultural heritage, health, and noise considerations.
- Consider more narrowing of traffic lanes to less than 12 feet.
- Avoid roads we can’t afford (Ron Milam, Principal of Fehr & Peers Associates).
- Apply smart parking policies (Donald Shoup) and parking charges in bigger shopping centers.
- Be ready for the arrival of driverless vehicles (especially level III & IV).

3. Planning Procedures
- Speed up the process for developers who respect the environment, cultural heritage, and aesthetics.
- Reward cutting edge developers with incentives (i.e. bonuses). For example make uptown an “EcoZone” like the “one planet town” coming up in Rohnert Park near Santa Rosa, CA, as in other parts of the world.

4. Transportation Demand Management (TDM)
- Make SLO one of the ten fastest implementers of the climate action plan in California.
- A well planned transportation demand management program can reduce vehicular traffic by 30%. This is possible in several locations of SLO.
- Appoint a strong coordinator of all departments for implementation of the SLO climate action plan.
- Send one city employee to the upcoming Climate Action Planning conference at Cal Poly in 2014.
- Send one city employee to the annual TDM conference of the Local Government Commission.
5. Model Cities & Websites
- Consider contacts and visits of cities that are strong in some of the above topics. For example:
  - Solvang, Davis, Palo Alto, and Arcata, CA
  - Boulder and Fort Collins, CO
  - Reston, VA
  - Fort Worth, TX
- Local Government Commission: www.lgc.org
- Victoria Transportation Policy Institute: www.vtpi.org
- Urban Land Institute (ULI): www.uli.org
- Walk Friendly Communities: www.walkfriendly.org
- The League of American Bicyclists: www.bikeleague.org/bfa

NOTES

A. Diagrams

---

**Diagram 2**

**SUMMARY SCHEME OF SUSTAINABLE MOBILITY**

**Three Sectors**

- Planning Priorities
  1. Land Use
  2. Pedestrians
  3. Bicycles
  4. Public transit
  5. Cars

- Impact Analysis
  1. Oil (diminishing reserves)
  2. Global warming
  3. Local Air Quality +
  4. Less Traffic Accidents
  5. Congestion Management

- Geographic Areas
  1. City
  2. County
  3. California
  4. Country (USA)
  5. Cosmopolitan (World)

**Ten Principles**

1. Walk the Walk
2. Powered by People (bicycles, etc.)
3. Get on the Bus (use public trans.)
4. Cruise Control (parking, etc.)
5. Get Real (history, traditions)
6. Make it Last (high quality design)
7. Connect the Blocks (narrow, short streets)
8. Fill it In (vacant lots)
9. Mix it Up (mixed land use)
10. Deliver the Goods (smaller delivery veh.)

Source: Eugene Jud, Course 527 Sustainable Mobility

**Diagram 3**

**Possible Future SLO Downtown Transit Center**

**Description**: On Santa Rosa Street on the territory of the Shell Station. The foreground is Monterey Street and in the background Higuera Street. On the right is the existing county building. This would be an exclusive pedestrian, bicycle, and bus area without cars “where downtown meets uptown”.

Source: Eugene Jud, Course CE 424 “Public Transportation” Fall 2012
B. Terms

**Popsicle Principle:** Your 7-year-old daughter wants to buy a popsicle in the neighborhood shopping center or further away. You are confident in sending her to the shopping center on her own due to a safe infrastructure that separates her from motor vehicles (i.e. under/overpasses). Many newer towns are built on this principle and older towns adapt to it.

**Shared Zones:** Allow traffic in pedestrian zones, but only low volumes and at low speeds. The pedestrian has the absolute right-of-way. See special regulations, for example by the federal government of Switzerland and chapter 10 of the website titled, “Well Designed Streets for Livable Communities on the U.S. West Coast” on [http://ceenv3.calpoly.edu/jud](http://ceenv3.calpoly.edu/jud).

C. Model Cities

**Solvang, CA:**
- Pedestrian and bike oriented. Offers bike rentals and horse and buggy.
- Contains strong cultural heritage and pleasing aesthetics.

**Palo Alto, CA:**
- Three bicycle boulevards with ten bridges/underpasses for bikes.
- Road diets on Charleston and Arastradero Streets.
- Sophisticated management of alternative transportation on campus.
- Bike station in the CalTrain rail station.

**Davis, CA:**
- Long pedestrian/bike overpass over Highway 80.

**Arcata, CA:**
- Does not allow shopping centers.
- One of the first cities to introduce traffic calming.
- Very pedestrian oriented. Has a pedestrian bridge over the freeway leading to the campus.

**Boulder, CO:**
- Best example of symbiosis between campus and town.
- Excellent BRT system with fancy names and colors for the different lines.
- Campus president encourages parents to not allow students to bring personal cars.
- Pearl Street is pedestrian only shopping zone with a daily farmer’s market on four blocks.
- Downtown parking garages are mixed use with offices and housing (aesthetics!).

**Fort Collins, CO:**
- Best example of symbiosis between businesses, students, and community.
- Awarded best city to live in by CNN.
- Complete streets with freight train, cars, pedestrians, and bicyclists.

**Reston, VA:**
- Applies the popsicle method for pedestrians and bikes between neighborhoods and downtown.
- Has a 45 mile bike trail that runs through the city and connects to other towns.

**Fort Worth, TX:**
- Successful privately owned downtown with largest private security in the country.
- Dramatic water features located in central area of downtown.
D. Supporters of this Approach
1. Eugene Jud, M.S. CE/M.S. ENVE/Licensed European Engineer/Fellow ITE (leader ad interim)
2. Grace Morgan, B.S. ASCI (secretary)
3. Peter Schwartz, Cal Poly Associate Physics Professor
4. Shahram Shariati, M.S. CE/MBA/LEED GA/EIT
5. Blayne Morgan, M.S. CE/ENVE
6. Michael Falcone, CE/EIT
7. Robin Oswald, Cal Poly Corporate Health Insurance Consultant
8. Smadar Boardman, B.S. CE/EIT
9. Kim Daum, B.S. Horticulture
10. James Cooper, B.S. CE/PE
11. Brian Nelson, B.S. CE/PE
12. Tom Nguyen, B.S. CE/EIT
13. Tony Vi, B.S. ME/EIT
14. Sasha Racu, B.S. CE/EIT
15. Shannon Gourley, M.S. English
16. Alisha Lopez, B.S. Psychology
17. Albert Toberer, B.S. Psychology
18. Bill Steen, B.S. CE/EIT
19. Lori Atwater, Sustainable Energy Expert
20. Joe Yu, M.S. CE/EIT
21. Kristina Mai, CE
22. Dee Jakes, SLO Resident
23. James Loy, MS CE/EIT
24. Kimberley Mastako, Ph.D. CE
25. Veronika Pesinova, Ph.D. ENVE Consultant
26. Anne Wyatt, Planner/Writer
27. Forrester Fringer, BUS....

Now more than 40 people are on the list!
Spectacular E-W Bicycle/Pedestrian Connection
Across the Valley (see example Davis CA)
SLO South: Road Functions Adjusted to Sensitive Residences (noise reduction, to more open space and AG land)

Legend:
- Freeway
- Reg. Route
- Arterial
- Collector

1. Especially Kerosene Trucks to Airport
2. and (3) Optimum Phasing Possible

Farmhouse and Surroundings as Protected Cultural Heritage Park with Small Service Road. Emergency Vehicles May Use

Traffic Jams Reduced by Buckley Rd., Transit, Bicycles, and Peds.

All Roads West of Broad Street Are Truck Routes - Except Prado Road East of South Higuera Street

Important Direct Links
Response to Comment P3-1
This comment provides general opinions regarding issues such as the LUCE Update process and climate change. Although the information provided by this comment does not pertain to the adequacy of the environmental impact analysis provided in the Draft EIR, the comment has been noted and will be provided to the Planning Commission and City Council for consideration in the decision-making process.

Response to Comment P3-2
This comment provides general opinions regarding the impacts of the LUCE Update Project, other development projects in and near the city, and states that “we are in dramatic violation of CEQA.” No details are provided regarding the nature of the alleged non-compliance with the requirements of CEQA, therefore, no additional response can be provided. Although the information provided by this comment does not pertain directly to the adequacy of the environmental impact analysis provided in the Draft EIR, the comment has been noted and will be provided to the Planning Commission and City Council for consideration in the decision-making process.

Response to Comment P3-3
This comment provides general opinions regarding the air quality impacts of the proposed LUCE Update, various transportation demand management programs and strategies, and the Reduced Development Alternative evaluated by the Draft EIR. Although the information provided by this comment does not directly relate to the adequacy of the environmental impact analysis provided in the Draft EIR, the comment has been noted and will be provided to the Planning Commission and City Council for consideration in the decision-making process.

Response to Comment P3-4
This comment provides a general opinion. Although the information provided by this comment does not pertain to the adequacy of the environmental impact analysis provided in the Draft EIR, the comment has been noted and will be provided to the Planning Commission and City Council for consideration in the decision-making process.
July 16, 2014

TO: Kim Murry, Community Development Department, City of SLO

FROM: HEAL-SLO Healthy Communities Work Group

RE: City of SLO, Land Use & Circulation Update, Draft Program EIR

The Healthy Communities work group has reviewed the Draft Program EIR for the Land Use and Circulation Update of the City of San Luis Obispo General Plan. SCH #2013121019

We are in full support of the project objectives and have evaluated the plan relative to these objectives and those of HEAL-SLO. While the DEIR details some potential impacts, none appear to have significant health implications assuming mitigation is possible. If mitigation of these effects is found to be unfeasible, we recommend consideration of the Reduced Development Alternative. This alternative would still allow for significant growth and improvement of infrastructure while reducing a number of potential health impacts relating to air quality, reduction of prime agricultural land, development in flood plains and noise due to traffic and construction.

According to the Centers for Disease Control and Prevention, chronic diseases are the leading causes of death and disability in the United States. A majority of these chronic diseases including heart disease, stroke, respiratory diseases, cancer, and diabetes are linked to risk factors such as obesity, poor nutrition and insufficient physical activity. As stated in a recent CDC report, “the majority of these risk factors do not occur randomly in populations; they are closely aligned with the social, demographic, environmental, economic, and geographic attributes of the neighborhoods in which people live and work.” The policies in the Land Use and Circulation Elements (LUCE) of the General Plan have the potential to positively influence public health outcomes because of their inextricable link to these factors.

We support this LUCE update as it represents an opportunity to improve public health by facilitating access to healthy food, improving walkability, increasing feasibility of alternative transportation options and improving air quality. We are encouraged by the objectives of the LUCE Update and more specifically, the inclusion of the “Healthy Community” policies in the Land Use Element. We look forward to continued consideration of these important factors beyond the scope of the EIR.

Thank you for the opportunity to review this project.

HEAL-SLO is the SLO County obesity prevention coalition and its mission is to increase healthy eating and regular physical activity among County residents through policy, behavioral and environmental changes. In carrying out that mission, a subcommittee called the Healthy Communities Work Group provides responses to Planning staff from a healthy community’s perspective on proposed land development projects, ordinance and general plan amendments, and special projects.
Response to Comment P4-1
This comment provides general support for the proposed LUCE Update project as it relates to the potential health-related impacts of the proposed Project and the Reduced Development Alternative. The comment has been noted and will be provided to the Planning Commission and City Council for consideration in the decision-making process.
Dear Ms. Murry,

I have the following comments regarding the "Sustainable Design" section of the Land Use Element. Would you please confirm receipt and please black-out my email address in the public record? Thank you.

Please consider:

- Adding "trees", in addition to building elements, to the "Privacy and Solar Access' clause (because of the Solar Shade Act).

- Incorporating requirements for buildings to be solar-ready, similar to some other cities, e.g. Santa Monica and Chula Vista. See Chula Vista's Ordinance: [http://www.chulavistaca.gov/City_Services/Development_Services/Planning_Building/SustainabilityCenter/solar/default.asp](http://www.chulavistaca.gov/City_Services/Development_Services/Planning_Building/SustainabilityCenter/solar/default.asp)

- Incentives for developments that incorporate features that actively offset at least 50% of operational energy use, e.g. solar water heating, geothermal, wind energy, and photovoltaic systems.

- Providing some specific requirements, such as LED efficiency levels (or better) for lighting parking lots and built-in fixtures, except where use of alternate lighting is shown to be necessary.

- Specifying installation of ENERGY STAR rated dishwashers (meeting the most current ENERGY STAR minimum criteria), under the appliances section, to protect against high water usage. (Current standard is less than 4.2 gallons/load.)

- A high minimum percentage of drought tolerant landscaping (probably different for different types of developments)

The document says "best practices" for building design. Does this correspond to a minimum LEED rating or some other guiding document? It seems open ended.

Additionally, preserving potable water resources is of great concern in our city and state. Landscape irrigation is a major use of water. The City has substantial investment in wastewater treatment, with at least a $9.5 million investment coming in upgrades. Reclaimed water can be used for landscape irrigation. Reclaimed water lines could be brought to developments needing water or sewer lines, until the point at which the City has distributed its excess reclaimed water. Bringing the lines could be a shared cost, e.g. the cost to the developer could be inversely proportional to the water savings of its grey water system and amount of planned drought tolerant landscaping. I understand that planning widespread use of reclaimed water involves a good amount of analysis. Nonetheless, I think we could have stronger requirements in the Land Use Element for preserving potable water resources, and this is one aspect to consider including, in some form.

Sincerely,

Donna Di Gangi
Resident of San Luis Obispo
William Kavadas

From: Donna
Sent: Monday, July 14, 2014 4:23 PM
To: Murry, Kim
Subject: RE: Comments on Land Use Element - Sustainable Design

Dear Ms. Murry,

I have an additional comment for the "Sustainable Design" section of the Land Use Element. Would you please confirm receipt and please black-out my email address in the public record? Thank you.

To the sustainable design features, please consider:

- For single family homes, townhomes, and duplexes, one 240V outlet for electric vehicle charging, per vehicle parking space covered by a garage or car port.
- For apartments with garages, one 240V outlet for electric vehicle charging, per vehicle parking space covered by the garage.
- For all other types of residential developments, at least one 240V outlet for electric vehicle charging for every 20 bedrooms, adjacent to parking spaces, along with a plan for resident usage and payment. Payment shall not exceed actual metered rate charges.

Sincerely,

Donna Di Gangi
Resident of San Luis Obispo

CONFIDENTIALITY NOTICE: This e-mail and any attachments may contain confidential information intended solely for the use of the addressee. If the reader of this message is not the intended recipient, any distribution, copying, or use of this e-mail or its attachments is prohibited. If you received this message in error, please notify the sender immediately by e-mail and delete this message and any copies.

From: Donna
Sent: Saturday, June 14, 2014 1:48 AM
To: 'Murry, Kim'
Subject: Comments on Land Use Element - Sustainable Design

Dear Ms. Murry,

I have the following comments regarding the "Sustainable Design" section of the Land Use Element. Would you please confirm receipt and please black-out my email address in the public record? Thank you.

Please consider:

- Adding "trees", in addition to building elements, to the "Privacy and Solar Access" clause (because of the Solar Shade Act).
- Incorporating requirements for buildings to be solar-ready, similar to some other cities, e.g. Santa Monica and Chula Vista. See Chula Vista's Ordinance: http://www.chulavistaca.gov/City_Services/Development_Services/Planning_Building/SustainabilityCenter/solar/default.asp
- Incentives for developments that incorporate features that actively offset at least 50% of operational energy use, e.g. solar water heating, geothermal, wind energy, and photovoltaic systems.
• Providing some specific requirements, such as LED efficiency levels (or better) for lighting parking lots and built-in fixtures, except where use of alternate lighting is shown to be necessary.

• Specifying installation of ENERGY STAR rated dishwashers (meeting the most current ENERGY STAR minimum criteria), under the appliances section, to protect against high water usage. (Current standard is less than 4.2 gallons/load.)

• A high minimum percentage of drought tolerant landscaping (probably different for different types of developments)

The document says "best practices" for building design. Does this correspond to a minimum LEED rating or some other guiding document? It seems open ended.

Additionally, preserving potable water resources is of great concern in our city and state. Landscape irrigation is a major use of water. The City has substantial investment in wastewater treatment, with at least a $9.5 million investment coming in upgrades. Reclaimed water can be used for landscape irrigation. Reclaimed water lines could be brought to developments needing water or sewer lines, until the point at which the City has distributed its excess reclaimed water. Bringing the lines could be a shared cost, e.g. the cost to the developer could be inversely proportional to the water savings of its grey water system and amount of planned drought tolerant landscaping. I understand that planning widespread use of reclaimed water involves a good amount of analysis. Nonetheless, I think we could have stronger requirements in the Land Use Element for preserving potable water resources, and this is one aspect to consider including, in some form.

Sincerely,

Donna Di Gangi
Resident of San Luis Obispo

CONFIDENTIALITY NOTICE: This e-mail and any attachments may contain confidential information intended solely for the use of the addressee. If the reader of this message is not the intended recipient, any distribution, copying, or use of this e-mail or its attachments is prohibited. If you received this message in error, please notify the sender immediately by e-mail and delete this message and any copies.
Response to Comment P5-1
This comment provides suggestions for the revision of or edits to the proposed LUCE Update as it relates to solar access, energy use, and landscaping standards. Although the information provided by this comment does not pertain to the adequacy of the environmental impact analysis provided by the Draft EIR, the comment has been noted in Appendix of the Final EIR and will be provided to the Planning Commission and City Council for consideration in the decision-making process.

Please also refer to Master Response #1, Comments Specific to the LUCE Update Concepts and/or Policies; and Master Response #2, Programmatic Nature of EIR.

Response to Comment P5-2
This comment provides suggestions for the revision of or edits to the proposed LUCE Update as it relates to potable and recycled water use. Although the information provided by this comment does not pertain to the adequacy of the environmental impact analysis provided by the Draft EIR, the comment has been noted in Appendix of the Final EIR and will be provided to the Planning Commission and City Council for consideration in the decision-making process.

Please also refer to Master Response #1, Comments Specific to the LUCE Update Concepts and/or Policies.

Response to Comment P5-3
This comment provides suggestions for the revision of or edits to the proposed LUCE Update as it relates to sustainable design features. Although the information provided by this comment does not pertain to the adequacy of the environmental impact analysis provided by the Draft EIR, the comment has been noted in Appendix of the Final EIR and will be provided to the Planning Commission and City Council for consideration in the decision making process.

Please also refer to Master Response #1, Comments Specific to the LUCE Update Concepts and/or Policies, and Master Response #2, Programmatic Nature of EIR.
I am writing in response to the LUCE draft released, as a public comment.

It appears that there was a flaw in the scoping process in the evaluation of an LOVR bypass. The LUCE only examines the utility of the bypass with leaving the existing LOVR connection between the easterly side of the 101 and South Higuera Streets as it currently stands. Instituting the bypass to the south of Los Verdes Park II development, directly to a future Buckley Road connection and rerouting all Los Osos Valley Road traffic through this new, longer LOVR connector, while creating a Los Osos Valley Circle for localized and emergency traffic from the existing portion between the end of the Los Verdes developments and S. Higuera, offers many benefits to the city:

1. Space for a purpose built connector with ample space for multiple lanes to improve LOS along the LOVR and S. Higuera corridors. Without passing through the residential neighborhoods, traffic could move at higher speeds and thus exit the corridor—prone to backup—much faster. Additional lanes would also be an option to improve the traffic even more.

2. Ample space for landscaped medians, creating a welcoming gateway to the southern end of the City, where much of the economic development and growth programs are currently focused. This is also the gateway most commonly used for access to the neighboring Edna Valley Wine Country, so there is an enhanced tourist experience with a redirection as well.

3. Eventual connection to a Buckley Road extension would allow a direct intersection at the end of LOVR, clearing traffic between 227, S. Higuera and 101 much more efficiently.

4. Ample space for bicycle and pedestrian traffic—either as the exclusive use of the existing LOVR (with the exception of local, school bus, and emergency vehicle traffic) once it is made to a cul-de-sac, or as part of the new, larger, purpose-built relocated Los Osos Valley Road.

5. The new direct connection of LOVR linking directly into Buckley to reach 227 creates a straight connection between two highways, and may open up grant opportunities to the City for funding connectivity improvements.

6. The benefits of a true rerouting extend throughout the county for those commuting into and out of the City, enhancing the City's position as the economic center of San Luis Obispo County. This is the second highest use access point to 101 within the City, according to the document. As the airport, Tank Farm, Buckley and S. Higuera areas continue to be developed, traffic in this corridor will continue to increase significantly.

The LOVR bypass included in the LUCE includes three signalized intersections: LOVR at S. Higuera, S. Higuera at Buckley bypass connection and LOVR at the bypass connection. If LOVR were rerouted so all traffic passed through the bypass, there would only need to be one or two signalized intersections: S. Higuera at Buckley bypass / new LOVR and (optionally) S. Higuera at the former LOVR (Los Osos Valley Circle, if you will). The latter could be a stop-sign controlled intersection with the addition of a turn lane median on S. Higuera, similar to the junction of Las Praderas Drive and S. Higuera.

By eliminating one or two of the signals included in the current LUCE study, the results of the traffic modeling throughout the S. Higuera corridor would be significantly different.

The full rerouting of LOVR as I've described was discussed extensively during the settlement process between the Los Verdes Parks, the City and CalTrans for the LOVR Interchange Project. To see it not included in the scope of the LUCE evaluations is a major flaw of this document.

Sincerely,
Sarah Fickinger
79 Del Oro Court
San Luis Obispo, CA 93401
805-594-0492
Response to Comment P6-1

This commenter provides general support for the proposed LUCE Update project as it relates to the LOVR Bypass improvement concept. However, the commenter recommends an alternative of the proposed LUCE Update LOVR Bypass project than what was analyzed in the LUCE Update (Appendix N). The commenter recommends a complete closure of the existing LOVR to develop a completely new alignment. This comment reflects/provides a general opinion not supported by detailed operational assessments. Nonetheless, assessments of alternative alignments will be conducted as part of the project-specific environmental review required for future development consistent with the requirements of CEQA and City Policy 12.3.11 Environmental Review.

Please also refer to Master Response #2, Programmatic Nature of the EIR. Although the information provided by this comment does not pertain to the adequacy of the environmental impact analysis provided in the Draft EIR, the comment has been noted and will be provided to the Planning Commission and City Council for consideration in the decision making process.
July 22, 2014
Kim Murry, Community Development Department
City Council Members – City Clerk
Jake Hudson, Traffic Operations Manager
City of San Luis Obispo
919 Palm Street
San Luis Obispo CA 93401-3218

Re: Proposed Program 3.1.7 – June 2014, Page ES-5
   Regional Transportation Center
   Executive Summary

“…to develop…transportation center downtown.”

The proposal to convert Marsh and Higuera (especially Higuera) Streets between Santa Rosa and California into two-way streets would negatively impact the proposed site plans for a centralized Transportation Center.

Inasmuch as there are plans to develop other properties in this area – i.e. the Brownstone project, a parking structure and the Shell station area - I believe by changing the direction of vehicle flow would create more problems than would be resolved. As I’m certain you are aware, there have been agreed upon plans for the Transit Center in this area and therefore I fail to understand the reasoning behind the proposed change to Higuera and Marsh. This, I feel, would create confusion as to when the street is a one-way or two-way. And, the problem of the ability of a bus to maneuver when entering a two-way street (as is now evidenced by the present situation in the Palm area) would be augmented.

Upon reading some of the “objections” to a Transit Center in the Draft Program Vol. 1 (pgs.4-9 and 4.225), I find these could apply directly to the proposed developments of residential/commercial as well as a Transit Center.

Kindly reconsider incorporating this change.

Louise Justice
3000 Augusta Street, #218
San Luis Obispo CA 93401
(805) 594-1914
<table>
<thead>
<tr>
<th>Site Number</th>
<th>Site Description</th>
</tr>
</thead>
</table>
| 1 | Boysen Ave. and Santa Rosa St.  
Consideration of separated crossing for bikes/pedestrians of Santa Rosa at Boysen. Consider all vehicular alternatives for Boysen intersection at SR 1 including full closure, access restrictions, and retaining its current configuration. |
| 2 | Realignment of Chorro and Broad and Boysen.  
Potential Ramp Closures at Highway 101 and State Route 1  
Consideration of ramp closures and consolidated SR1/Highway 101 interchange including the need for a signage/way-finding program. |
| 3 | Broad St. and Highway 101 Ramp Closures  
Consideration of ramp closures at Broad with the addition of bike and pedestrian overpass.  
Convert Marsh St. and Higuera St. to Two-way  
(Santa Rosa St. to California Blvd.)  
Consideration of two way vehicular circulation of Marsh and Higuera between Santa Rosa and California.  
Transit Center Location on Santa Rosa St. and Higuera St.  
Consideration of site/block of Higuera/Santa Rosa/Monterey for the transit center location and consider use of both public and private property. Consider ideas from student projects and the Downtown Concept Plan.  
Mission Plaza “Dog Leg”  
Consideration of several design alternatives with varying degrees of streets affected. Analyze full closure of roadways. Develop policy direction regarding desired outcomes and nature and phasing of treatment for the area. |
| 4 | Realignment Bianchi Ln. and Pismo St.  
Consideration of realignment of street intersection (Pismo to Bianchi). |
| 5 | Realign Madonna Rd. to Bridge St Instead of Higuera St.  
Consider appropriate connection from Madonna to S. Higuera associated with redevelopment of Caltrans site. Potential to realign Madonna to connect with Bridge Street may better address some pedestrian and bike connections. |
| 6 | Bishop St. Extension  
Evaluate elimination of Bishop Street bridge over railroad tracks and consider reducing the width of Johnson Ave. |
| 7 | Victoria Ave. Connection to Emily St.  
Consideration of Victoria connection to Emily. |
| 8 | Broad St. – Consolidate Access  
Consideration of Broad Street consolidation of access points. |
| 9 | Orcutt Rd. Overpass  
Keep facility as part of Circulation Element. Do not consider removing facility due to concerns about increasing rail traffic. |
| 10 | Froom Rd. Connection to Oceanaire Neighborhood  
Provide pedestrian and bicycle connectivity only. |
| 11 | Prado Rd. Interchange vs. Overpass  
Evaluate both interchange and overpass. |
| 12 | North-South Connection between Tank Farm Rd. and Buckley Rd.  
Consideration creating a north-south connection between Tank Farm and Buckley for future connectivity. |
| 13 | Buckley Rd. to LOVR Connections  
Consider (Buckley to Higuera connection and Higuera to LOVR behind Los Verdes - 101 bypass. |
Response to Comment P7-1

The commenter provides the general opinion that converting Marsh Street and Higuera Street from one-way to two-way could adversely affect circulation associated with the proposed site plans for a transit center. As part of the SLOCOG Coordinated Transit Center Study, the two-way conversion was evaluated for potential conflicts with pedestrian, bicycle and bus activity at the Transportation Center, and no substantive conflicts were identified. As documented in Mass Transportation Committee (MTC) minutes, the MTC & SLORTA supports the concept to improve access and bus routing to the site. Although the information provided by this comment does not pertain to the adequacy of the environmental impact analysis provided in the Draft EIR, the comment has been noted and will be provided to the Planning Commission and City Council for consideration in the decision making process.
Kim,
I have waited to the last moment in hopes that as I searched the City's web page I could find updated maps showing the proposed circulation plans to be included in the update. I couldn't find them, but I am not an astute computer user.

BUT, I want to go on record with some questions on the whole LUCE process the City has followed - a process that, frankly, has confounded me. Perhaps I just haven't found the right index to discover the information I seek.

1. Where do I find the results of a comprehensive public survey of the key information needed to either create or update a General Plan, and that is an analysis of how the people presently living in the City, as well as visitors, use our city. Responses to such questions as: where do family members work; where do your children go to school; where to you shop (both in-town and out-of-town) with a breakdown for food, clothing, house and garden maintenance; where to you recreate (both in-town and out-of-town); location of friends and family (both in-town and out-of-town); where to you seek health care; where do you attend church; etc., etc. etc. Obviously I would expect such a necessary and vital poll to differentiate between all members of a household. How can any circulation plan or amendment to such plan be made without an analysis of such information???

How will growth proposals effect land use capacities and consequently street capacities and/or relocation of major traffic carrying arterials.

One simple case in point, emergence health care. French Hospital has developed a very enviable national reputation for cardiac treatment. French hospital sits on Johnson Avenue. If a person having an acute heart attack lived on the other side of the RR tracks, how does that person get to French? What happens if a train is blocking Orcutt crossing?

Conversely, if a person lived on the Johnson Ave. side of town, how to they get to shopping in the Madonna or Los Osos shopping centers? The circulation gymnastics are crazy.

2. Prado Road intersection with 101. It has been reported that Cal Trans discourages freeway intersections less than two miles apart. Given the eventual growth of Edna and portions of the Airport Area, it would seem there will be very heavy loads of people seeking shopping opportunities in the Madonna-Dalldo shopping area as well as simple direct access to 101. There is likely to be significant future customers from both North and South Counties. therefore, it might seem much more appropriate to close Madonna Road / 101 on-off ramps in favor of opening Prado road ramps; has this been studied? And if not, why not? the Madonna Road-South Higuera intersection and link to South Street is a terrible configuration.

3. There is another unique circulation problem I worry about having
been Mayor at the time of the 1973 flood (during which SLO was declared a National Disaster Area), I wonder what the General Plan recommends in the way of structural changes to prevent, or, at least, reduce potential flood damage. The current City response to cut weeds out of the flood ways periodically is a farce. What's more alarming is that there is not one single staff member or council member who was with the city in an official capacity during that time and consequently has little or no comprehension of what a flood disaster means to SLO. And that flood according to hydraulic engineers that studied the flood record after the fact, declared that flood to be a “80 year” and NOT a one-hundred year flood as frequently rumored. For the record, 101 at the Los Osos interchange was completely flooded cutting off that connection with our City. ALL of Cal Trans culverts/bridges over the San Luis creek are under-designed and need to be reconstructed. How does the General Plan propose this be done and when?

I have been told that the current plan for modifying/redesigning the 101 - Los Osos interchange continues to show the storm drainage culvert carrying Laguna - Froom Creek flows under 101 is still designed for a 20 year storm capacity . . . is that correct? If so, it represents a design travesty and should be corrected before construction starts. According to the best post-flood hydraulic advice the City received, our flood problem can only be remedied by starting downstream and working upstream; like pulling the plug in a bathtub. I see this as an essential part of a comprehensive General Plan update and expect the EIR to be very, very clear on flooding problems. This is a safety problem of the first magnitude.
Response to Comment P8-1
The Commenter questions the processes conducting the LUCE update, including public survey input and growth proposal effects on land use and street capacities. A Public survey was conducted at the start of the LUCE Update Process to gage citizen view of the future for San Luis Obispo. The following link is the City Council approved survey: http://www.slo2035.com/images/meetings/tf/00_slogpu_survey_2012.09.16-rrr.pdf. Growth proposals are shown in Table 2.4.3 of Section 2.0 of the Draft Program EIR. This information was used as part of the Comprehensive Traffic Model which is described and contained in Section 4.15 of the Draft Program EIR.

Detailed travel from multiple specific points is beyond the scope of this document, but circulation as a whole was researched as part of the Draft Program EIR. In regards to emergency services, assessment of four minute response time for the San Luis Obispo Fire Department is illustrated in Figure 4.13-1 of the Draft Program EIR and evaluated in Section 4.13 of the Draft Program EIR.

Response to Comment P8-2
The commenter states that the closure of the Madonna Road overpass should be studied. Closure of the Madonna/101 Interchange was not an identified alternative and therefore was not studied in this EIR. However both a realignment of Madonna Road and the Prado Road interchange have been studied. Proposals for the Prado Road interchange or overpass are being incorporated as part of the proposed project and further study of the 101 corridor in this vicinity including the Madonna interchange will have further evaluation as part of environmental review of adjacent development. Both circulation alternatives are studied per the City Traffic Model. The City of San Luis Obispo works closely with Caltrans and SLOCOG to facilitate a sustainable, regional transportation system.

Response to Comment P8-3
This comment provides general information regarding flooding hazards in San Luis Obispo. Potential flooding-related impacts of the LUCE Update project were evaluated at a programmatic level of detail, and Impact HWQ:1 identifies proposed development areas that would be located within designated 100-year floodplain areas. The City concurs that future development projects that would be subject to flooding-related impacts would require the preparation of a site-specific drainage and flooding analysis. Such an evaluation would be conducted as part of the project-specific environmental review required for future development consistent with the requirements of CEQA and City Policy 12.3.11 Environmental Review.

Please also refer to Master Response #2, Programmatic Nature of the EIR. The information provided by this comment has been noted and will be provided to the Planning Commission and City Council for consideration in the decision-making process.

Response to Comment P8-4
This comment provides an opinion regarding the design of the US 101/Los Osos Road interchange related to conveying drainage from Froom Creek. Please refer to response P8-3 regarding the flooding-related impact analysis provided by the Draft EIR and subsequent project-specific analysis that would be required. Although the information provided by this comment does not pertain to the adequacy of the environmental impact analysis provided in the Draft EIR, the comment has been noted and will be provided to the Planning Commission and City Council for consideration in the decision-making process.
Dear Ms Murry,

I am in complete agreement with the comments submitted by Andrew Christie on behalf of the Santa Lucia Chapter of the Sierra Club.

Our city needs to look into the future. With unknown effects of climate chaos, drought, and increasingly dense population in the City of San Luis Obispo, our city needs to be proactive in its measures to protect the natural landscape, water resources, and air quality of our region.

Please take heed to Andrew Christie's admonitions.

Sincerely,

Linda Seeley
859 Mission Street
San Luis Obispo, CA 93405
805-234-1769
mothersforpeace.org
santaluciasierraclub.org
Sierra Club Nuclear Free Campaign
805-234-1769
Response to Comment P9-1

This comment expresses support for comments submitted by the Sierra Club (comment letter P2). Please refer to responses provided for comment letter P2.
July 28, 2014

Derek Johnson, Community Development Director
City of San Luis Obispo
919 Palm Street
San Luis Obispo, CA 93401

Derek:

Thank you for the opportunity to review and comment on the LUCE EIR. We have found the document to be useful and informative. The inclusion of the various special study areas and specific plan areas, such as Avila Ranch, is very helpful to tier subsequent environmental documents and to inform the public on the probable environmental effects of the LUCE and the component major projects. However, we believe that there are several issues that would benefit from additional existing information, more specificity on the mitigation measures, and other changes or additions that will allow more effective tiering and implementation. On behalf of Avila Ranch, LLC, I’d like to make the following comments.

Hazards and Hazardous Materials

Hazardous Materials. Page 4-183 of the Draft EIR concludes that “Although extensive testing and groundwater monitoring at [the Chevron property] has shown that the contamination has not migrated from the Tank Farm facility, future construction associated with development of the nearby Avila Ranch Specific Plan Area has the potential to expose construction workers or future residents or visitors to previously undiscovered hazardous materials.” As you know, we have submitted a pre-development application that includes a Phase 1 and Phase 2 report for the Avila Ranch site. We commissioned that work to screen for pesticides and for hydrocarbon remnants from 1926 Tank Farm fire event. That testing concluded that there are no such contaminants on the property and the environmental record should reflect that. The environmental record affirms that there is no evidence that contaminants on the Chevron property extend to the Avila Ranch property, and no evidence of other contamination.

Airport Hazards. Page 4-190 of the Draft EIR observes that changing Avila Ranch from Business Park to Residential has the potential to be consistent with the ALUP noise, density and intensity standards because the residential density allowed in ALUP Safety Zone 2 would result in nearly 1,128 dwelling units allowed on the 94 developable acres of
property, or up to 7,500 employees under the existing BP zoning. The LUCE performance standards associated with this area envision up to 700 dwelling units and up to 25,000 sq. ft. of non-residential space, 400 units fewer than permitted under the adopted ALUP. The Draft EIR notes that the proposed pattern of development on the site is spread over the larger 120-acre portion of the property within the URL, which would involve areas in ALUP Safety Zones 1B and 1C which have maximum permitted densities of 1 unit per five acres. It should be noted that the Avila Ranch property also includes a 2,500-foot long, 300-foot wide east-west buffer area along the north side of Buckley Road that qualifies as a landing reservation area that mitigates any safety impacts. Development of the Avila Ranch property as proposed has a lower overall number of units and lower densities than permitted by the ALUP.

It should also be noted that the actual applicability of the ALUP to the Avila Ranch property and the resultant allowed (or disallowed) density is not possible to determine because the ALUP’s maps are not consistent with its policies, because the safety zones are not mapped according to the ALUP policies, because the noise contours do not accurately reflect noise produced from the airport, and because there are serious deficiencies in the ALUP’s base map. The ALUP is to have a “map” which, according to Section 65300.5 of the Government Code, is to be an accurate graphic expression of the plan’s policies. However, the ALUP map is wildly inaccurate. In Avila Ranch’s case, it’s property boundary is shown on the ALUP’s map to be almost 400 feet too far north and 150 too far east than it is in the real world. This places much of the Avila Ranch property in the incorrect ALUP safety and noise zones. Finally, research by the City has also revealed that the boundaries of the ALUP safety zones are not consistent with the dimensions referenced in the policies and that the runway locations themselves are not accurately represented on the ALUP map. The net result is that the ALUP cannot be relied upon to accurately assess whether or not there are excess safety and noise hazards associated with the Avila Ranch property (or any other property).

The Draft EIR should also indicate that the determination of significant noise and safety impact issues associated with airport operations is to be based on the guidance provided in the Caltrans Airport Land Use Handbook (“Handbook”). Section 21096 of the California Environmental Quality Act (“CEQA”) requires that “... the Airport Land Use Planning Handbook published by the Division of Aeronautics of the Department of Transportation, in compliance with Section 21674.5 of the Public Utilities Code and other documents, shall be utilized as a technical resource to assist in the preparation of the environmental impact report as the report relates to airport-related safety hazards and noise
problems.” Therefore, while any potential inconsistency between the LUCE and the ALUP should be noted, the determination of the presence or absence of actual excessive noise or safety hazards related to the airport is to be determined by the LUCE’s consistency with the Handbook’s guidance. Since the City’s proposed overlay zone is consistent with the Handbook zones (and more restrictive in some cases), a finding of no significant impact is warranted, regardless of consistency or inconsistency with the ALUP.

Draft performance standards for the property indicate a large percentage of the site is to be retained in open space including an agricultural buffer adjacent to Buckley Road that is in direct alignment with Runway 7/25. In addition, performance standards proposed in the LUCE update indicate that land uses shall be in keeping with the safety parameters of the State Aeronautics Act and the LUCE update or other applicable regulations. The bulk of the proposed development is anticipated to occur within proposed Airport Overlay Zone 6 along with some minor non-residential development. Currently, the entire property is in Zone 6 (Handbook Zone 6); however, the possible 500-foot extension of Runway 7/25 will place approximately three acres of Avila Ranch property that is inside the URL in Zone 4. Under the ALUP, one dwelling unit would be permitted in this area, and under the LUCE and associated airport safety zoning, no residential units would be permitted.

Public Services-Fire Protection Services

The lack of fire services in the southern part of the city is now a focus area and is identified as a potentially significant impact unless mitigated. This conclusion is different than previous environmental documents for the southern area. The Margarita and Airport Area EIR prepared in 2003 concluded that “the City’s existing four fire stations are adequate in meeting the City’s response time standards to these [Margarita SP and Airport SP areas] areas”. However, following that joint EIR, a Fire Master Plan was done in 2009. That document identified an underserved area east of 101, north of Buckley, west of Broad, and south of South Hills, virtually the entire Margarita and Airport Areas, and a portion of the Islay development area, as illustrated below. The Fire Master Plan concluded that this area is not within a four-minute travel time response coverage, and recommends adding a fifth fire station and crew to adequately serve it. While it is arguable that municipal services are not environmental impacts per Hayward v. Board of Trustees (2012), we offer the following comments on the LUCE Draft EIR.
The Draft EIR states that potential fire safety impacts that may result from new development located beyond the Fire Department’s four-minute travel time could feasibly be reduced to a less than significant level with the implementation of the existing and proposed Land Use Element and other General Plan policies, which indicate that new development may only be approved when adequate fire suppression services and facilities are available. The Draft EIR references as 4-minute travel time standard. This portion of the Draft EIR should also provide additional information to explain that the adequacy of fire suppression and emergency services responses should be based on the First Master Plan which includes a tiered response and drive-time criteria that was developed along the lines of National Fire Protection Association’s 1720 standard.

The fire services mitigation measure proposes to make Safety Policy 3.0 mandatory. It notes that while “…the intent of Safety Element Policy 3.0 is to ensure that adequate fire suppression services are provided to serve new development, the permissive wording of the policy (i.e., “Development should be approved only when adequate suppression services and facilities are available...) does not provide the mandatory (i.e., shall) language generally required for mitigation measures.” Proposed mitigation measure PS-1 requires that a revised policy similar to Safety Element Policy 3.0 be added to the proposed Land Use Element Update, and that the policy provide mandatory implementation language that would reduce potential fire suppression service impacts to a less than significant level:

Avila Ranch Comments on LUCE Draft EIR
July 28, 2014
"PS-1 New Policy. Development shall be approved only when adequate fire suppression services and facilities are available or will be made available concurrent with development, considering the setting, type, intensity, and form of the proposed development."

The proposed policy would require the development of a new fire station to serve future development in the southern portion of the city such as the Avila Ranch Specific Plan. It is expected that the development and operation of a new fire station would result in less than significant environmental impacts and no mitigation measures for potential fire station construction and operation impacts are required at this time.

There are a number of significant issues with the policy and the nature of the implementation. First, it misstates the actual requirements and recommendations in the Fire Master Plan. The Fire Master Plan DOES NOT recommend that a new fire station is needed immediately. Recommendation No. 3 of the Master Plan states that there be a total response time of 7 minutes (4-minute travel time) only after population density exceeds 1,000 persons per square mile. Until that time an 11-minute response time (8 minute travel time) meets City standards. The current population density in the Southern Annexation and adjacent areas is currently about 675 persons per square mile now (assuming the area between South Hills, Broad, Buckley and SH 101). Adding in Tracts 2353, 2342 and 2428 (King) would leave yet another 250 units to hit the threshold for the new fire station. Avila represents 625 units and Damon Garcia 524 units.

Second, to avoid potential inconsistencies, the Safety Element Policies and Programs should be amended to reference the recommendations and standards in the Fire Master Plan response time and fire suppression and emergency time planning. As the LUCE Draft EIR notes, the reference to “response times” in the Safety Element is ambiguous with reference to the start and end time for response. The LUCE Draft EIR has interpreted this to be consistent with the travel time metric specified in the Fire Master Plan. The Safety Element should be modified to be consistent with this interpretation, or it should refer to the metric contained in the adopted Fire Master Plan, and as it may be amended from time to time.

Third, the policy should recognize the extent of the properties benefiting from the proposed additional fire station. If the fire station to be located on the Chevron property between Tank Farm Road and Prado Road near the Santa Fe alignment, as proposed it will
become the first responding station to any calls in the Margarita Specific Plan area. This area is currently shown as NOT meeting the Master Plan’s response time criteria. Virtually all of the developed and undeveloped properties in the Margarita and Airport Specific Plans will directly benefit from this facility and should contribute towards its development and construction. By contrast, Avila Ranch is on the fringe of the service area for that fire station location and would be equally served by Station No. 3 and new Station No. 5.

Fourth, the Draft EIR should recognize that there are interim or alternative methods to achieve adequate response times. These may include a fire station with interim improvements, an emergency/medical services response station (which would serve 85 percent of the calls for service), or other alternatives. Some of these alternatives are proposed in the Chevron EIR (as follows) and should be included in the LUCE EIR as well:

**Mitigation Measure**

*PS/U-5a*  
The Applicant shall deed to the City property at the Project Site that the City could use for the development of a public fire station.

*PS/U-5b*  
Development shall only be approved when the City deems that adequate fire suppression services and facilities, consistent with adopted travel time standards, are available, or will be made available concurrent with development at the Project Site. If, at time of development it is determined that the development site is outside of adequate response time zones, feasible options to enhance emergency access to the development sites may include but are not limited to the following:

a. Completion of transportation improvements that improve emergency services travel time to proposed development sites.

b. Co-location of City fire services with existing CALFIRE facilities located on Broad Street

c. Establishment of fire facilities within a closer proximity to the development site that meet or exceed adopted travel time standards.

d. Developer/Applicant financing of other improvements that will contribute to alleviating current deficiencies as identified in the SLOFD Master Plan.

Fifth, the response time/travel time maps should be updated to reflect recent road-
way connections, and more current projected travel times. Currently, Avila Ranch appears to be within the 8-minute travel time prescribed by the First Master Plan, and large portions of it are within the a 4-5 minute travel time according to estimates prepared by Cannon (See graphic below). Based on the criteria in the First Master Plan, Avila Ranch is consistent with the response times for the Emerging Suburban population density category.

Sixth, if the mitigation measure is dependent on the entitlement and development of Avila Ranch, the City cannot make a less than significant finding. CEQA requires that the implementation program be “sufficiently certain” to qualify as a mitigation measure. There is no assurance that Avila Ranch will develop and be able to construct a new fire station in a timely enough manner to resolve response time deficiencies for other properties in the Airport Area and Margarita Area. Past strategies that allocate major improvements to individual properties have proven to be less reliable than thought or hoped (because development steers away from properties with excessive requirements). Implementation of a broader based implementation and financing strategy will provide greater assurance and reliability over time, and allow a less-than-significant finding.

Seventh, recent court cases related to municipal services and CEQA have concluded
that the provision of traditional municipal services such as police and fire is not strictly a CEQA issue, and that cities “...may not use CEQA to shift financial responsibility for providing fire and emergency services to the sponsor of an individual development project.” [City of Hayward v Board of Trustees of the California State University, A131412 (First District Court of Appeal, June 28, 2012).] Avila Ranch LLC supports implementation of a solution to address this issue that includes all of the benefitting property owners in the Margarita Area and Airport Area, with a reliable and broad-based financing mechanism that will ensure implementation and not place the principal burden of this (or other) facilities on Avila Ranch.

Finally, the mitigation measure should address the following:

1. That it recognize that the triggers for a new fire station have not yet been met, and will not be met until the southern annexation area reaches an average density of 1,000 persons per square mile. Approximately 500 additional equivalent dwelling units can be constructed in the southern annexation area until this threshold is met.

2. That both the Margarita Area and the Airport Areas are identified as eventually deficient, and that incremental development may take place if an implementation and funding strategy is in place to address the eventual need for a new station.

3. Clarify the meaning of “concurrent with development” in the mitigation measure. One could read this as an opening day requirement. This requirement should be modified to be consistent with Nos. 1 and 2 above.

4. Include both the Margarita and Airport Specific Plan areas in any assessment or financing mechanism, with an appropriate fee system spread out amongst all properties. Larger properties could participate with a CFD to provide a bondable source of revenue to provide up-front funds.

5. That the provision of public services is an economic, social and policy issue that is to be implemented on a broad-based, community level effort, and not placed on individual properties.

6. Re-run the 4-minute response maps assuming new north-south and east west connections that are likely to occur like Buckley Road, Prado, LOVR/101, and Horizon between Tank Farm and Suburban.
7. The City Council should adopt the Fire Master Plan recommendations or some modification thereof after formal consideration and public input. The Master Plan appears to have been presented to Council in study session in early 2009, but no formal adoption is otherwise referenced.

**Transportation and Circulation**

The Draft EIR does not contain available information relative to existing or projected traffic conditions in or around Avila Ranch. The traffic projections for the project are known to include the basic traffic generation data associated with Avila Ranch, and this information should be added to the technical appendices and reports to avoid duplication and possible inconsistencies between the LUCE EIR and subsequent project-specific EIRs. Specifically, information on the Buckley extension, the Buckley/Higuera and specific mitigations for Avila Ranch should be included. The Draft EIR also does not adequate information to address Circulation Alternatives No. 1 through 3 described in the Appendix N of the Draft EIR. Information should be added to address this, as suggested below.

The Buckley Extension from Vachell to Higuera has been a part of the San Luis Obispo Circulation Element for 20 years. It is also a facility that is funded in the Airport Area Specific Plan, and is part of the circulation plan for that specific plan area. However, at present, it is not shown in the LUCE Draft EIR as part of overall circulation plan for the City in the Project Description (although it does show up on Figure 4.15-4). The tables and analysis should be modified to include data related to intersection and road segment projections for Vachell, Higuera south of LOVR, and the Buckley extension from Vachell to Higuera.

A recent Technical Memorandum was issued on June 29th related to Sensitivity Analysis of the Roadway Improvements. We understand that the technical memorandum may be an expansion and analysis of information already in the traffic model, and may therefore not be “new information” for the purposes of CEQA. This memorandum appears to supplement and/or replace Appendix N. Since the memorandum was issued after the release of the Draft EIR, it is assumed that it is not yet a part of the environmental record. Item K of the memorandum covers the new north-south collector between Tank Farm and Buckley, and contains some, but not all of the traffic volume information that should be included in EIR. The technical memorandum appears to represent conditions and that need to be clarified or modified, and the technical memorandum should be revised and included.
in the environmental record based on the following:

1. There appear to be no trips assigned to Suburban, even though it is a signalized intersection providing secondary access to Avila Ranch and primary access to the Suburban Business Park and to the Higuera Plaza Shopping Center.

2. There is a connection from Suburban to Avila Ranch by way of the Earthwood Business Park. This connection has an irrevocable offer of dedication and is the most feasible way to provide a connection to Suburban in the near term.

3. The circulation network should include an extension of Venture to the new north-south collector. This connection has been represented on the Avila Ranch Master Plan for the last several years, on previous Business Park Master Plans, and in the Airport Area Specific Plan. It will be one of the primary access points to the Avila Ranch project and is expected to carry significant local traffic and should be added to the presumed roadway network.

4. The revised graphic and projections should include the Higuera/Buckley intersection and the projected traffic volumes on each of the approaches thereto.

5. Page 21 of the new technical memorandum purports to show volume increases or decreases as a result of the addition of the north-south collector. It illustrates volume decreases of approximately 1,600 ADT on a roadway approximately 1,000 feet east of Vachell. There is no such existing road. One is not proposed as part of the Avila Ranch Master Plan; further, one is not feasible since this area include a highly sensitive portion of Tank Farm Creek, and a bridge over the creek in that location is not possible given the geometry of the site and adjacent Buckley Road. Page 21 also shows a street between Vachell and Horizon/Jesperson, but no corresponding street is shown on Page 20. These inconsistencies should be corrected.

6. It is assumed that if Page 20 shows the LOS and ADT with the new connection that the traffic volumes without the new connection would the volumes on shown on Page 20, minus the adjustments shown on Page 21. This information should be provided in tabular form similar to the analysis is in other parts of the memorandum.

7. There appear to be inconsistencies between the segment volumes contained in the body of the Draft EIR and the technical appendices and memoranda. Perhaps these could be rectified by including street network maps with information
on existing and projected ADT, PM and AM peak hour counts and projections within the entire City Sphere of Influence.

It should also be noted in the EIR and the supporting graphics that the roadway network is intended to be schematic to illustrate network connections, and are not precise plan lines. For example, we propose to use the Earthwood Street connection to Suburban and another stub street to Suburban to complete the connectivity from Suburban to Venture, and from Suburban to Tank Farm. A continuous extension of Horizon from Tank Farm to Buckley as schematically illustrated in the circulation diagram is not needed or desired, or perhaps even feasible since this area is substantially developed.

Thank you for consideration of the our comments.

Sincerely,

Stephen J. Peck, AICP
Project Manager, Avila Ranch Development Project

Xc: Andy Mangano, Manager Member

Attached: Section 5—Recommended Solutions and Phasing Plan, Fire Department Master Plan for the City of San Luis Obispo, 2009.

SECTION 5—RECOMMENDED SOLUTIONS AND PHASING PLAN

5.1 DEPLOYMENT PLAN FINDINGS AND RECOMMENDATIONS

As this study has identified and measured, the City of San Luis Obispo has good fire crew coverage in much of the existing city but not in all of the annexation areas. Additionally, the Department is co-depandant on the neighboring County Fire Department for two reasons: (1) primary coverage into some City areas, and (2) providing the balance of the staffing needed for an effective response force (First Alarm) to serious fires and other serious or simultaneous emergencies.

The City is close to a desirable goal of being self-sufficient for usual and customary emergencies by fielding four fire companies per day. However, there are two gaps that over time that could be improved as fiscal resources allow:

1. The lack of 4-minute primary unit coverage by a City unit in the southern annexation areas;
2. Not enough total firefighters on duty to field an effective initial force to serious fires without help from the County Fire Department.

While the City could staff each of the three existing fire engines with 4 firefighters per day minimum, up from three, replacing the staffing reliance on the County for one additional 3-firefighter engine on a First Alarm fire, it does not address response times in the southern annexation area or allow simultaneous calls to be covered by a 5th unit in the event a County unit is not available.

Over time, as fiscal resources further allow if the City added a 5th fire station and crew in the southern annexation area and staffed the engine with a minimum of three personnel, then the daily staffing increases to 16 per day (plus the Battalion Chief) and not only improves the response times in the southern City, but also improves City-based staffing to serious multiple-unit emergencies in alignment with national best practice recommendations. Thus adding a 5th fire station and crew improves all the response system deficits identified in this study.

Citygate’s deployment findings for San Luis Obispo as noted in Section 2 are:

Finding #1: The City does not have a fire deployment measure adopted by the City Council that includes a beginning time measure starting from the point of dispatch receiving the 911-phone call, and a goal statement tied to risks and outcome expectations. The deployment measure should have a second measurement statement to define multiple-unit response coverage for serious emergencies. Making these deployment goal changes will meet the best practice recommendations of the Center for Public Safety Excellence (formerly the Commission on Fire Accreditation International).

Finding #2: The diversity, age and size of the City and Cal Poly building stock and the increasing numbers of younger and older populations means that there is a greater chance of more serious fires where rescues will be necessary, and if so, the
current quantity of firefighter staffing will be quickly overwhelmed with too many critical tasks to accomplish.

Finding #3: Given the travel distances in the existing southwest and southern annexation areas, a 5th fire station is desirable, when the annexation areas fully develop.

Finding #4: If an additional fire company location could be funded, effective first-due unit coverage can be obtained at the build-out of the City from five (5) fire station sites, at 4 minutes travel time.

Finding #5: While multiple-unit coverage is currently adequate in the core of the City, it depends on successful, timely, mutual aid from either of the two County stations, which are not always available. A future 5th City fire station will increase multiple-unit coverage in the southwest and southern areas, as well as lessen dependence on the two County fire stations.

Finding #6: Federal and state incident reporting mandates have established NFIRS 5 (National Fire Incident Reporting System Version 5) as the definitive reporting standard for fire departments. While NFIRS 5’s “Basic” module is mandatory, best practices dictate use of the optional “Apparatus” module to document vehicle responses. The Department needs to adopt this reporting standard.

Finding #7: With a City fire/EMS incident first-due unit performance of 07:00 (minutes/seconds) at 71.6 percent, and a travel time of 05:15 at 90 percent, as the mapping analysis predicted, the City does not have enough primary neighborhood fire stations in the City to deliver suburban response times to all outer areas.

Finding #8: The City dispatch and fire crew turnout times need focus by both agencies (Police Dispatch and Fire Department) to lower times to best practice recommendations. If a combined 01:30 (minutes/seconds) from dispatch and turnout time is saved, citywide emergency response time would lower to the recommended 07:00 at 90 percent.

Finding #9: The simultaneous emergency call for service rate of 18 percent for two incidents at once is not a significant issue in the near term given the mutual aid support from the County fire stations.

Finding #10: The City benefits from the mutual aid regional response system. While this system cannot replace existing City stations or units, the City should continue to participate in this valuable support system for simultaneous calls for service and multiple-unit serious emergencies.

Citygate’s recommendations are designed to improve these issues as fiscal resources allow. Based on Citygate’s above findings and the national best practices outlined in this study, Citygate makes the following recommendations regarding fire station and crew deployment:

Recommendation #1: The City should adopt revised performance measures to direct fire station location planning and to monitor the operation of the
Department. The measures should take into account a realistic company turnout time of 2 minutes and be designed to deliver outcomes that will save patients medically salvageable upon arrival; and to keep small, but serious fires from becoming greater alarm fires. Citygate recommends these measures be:

1.1 Distribution of Fire Stations: To treat medical patients and control small fires, the first-due unit should arrive within 7 minutes, 90 percent of the time from the receipt of the 911 call. This equates to 1 minute dispatch time, 2 minutes company turnout time and 4 minutes drive time spacing for single stations.

1.2 Multiple-Unit Effective Response Force for Serious Emergencies: To confine fires near the room of origin, to stop wildland fires to under 3 acres when noticed promptly and to treat up to 5 medical patients at once, a multiple-unit response of at least 14 personnel should arrive within 11 minutes from the time of 911 call receipt, 90 percent of the time. This equates to 1 minute dispatch time, 2 minutes company turnout time and 8 minutes drive time spacing for multiple units.

Recommendation #2: As fiscal resources allow, the most beneficial next improvement in fire services the City could make would be to add a fire station in the southern City area equipped with one fire engine and a 3-person crew.

Recommendation #3: The City should adopt fire deployment measures for the emerging southern annexation areas, ranging from rural to emerging suburban to suburban based on population, along the lines of this table modeled after the recommendations in NFPA 1720 on combination (volunteer) fire services. These measures would allow the City to define the services that can be cost effectively delivered in the early annexation period and then set the trigger point for adding fire services.

<table>
<thead>
<tr>
<th>Proposed Deployment Measures Based on Population Densities</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td>1st Due Travel Time</td>
</tr>
<tr>
<td>Total Reflex Time</td>
</tr>
<tr>
<td>1st Alarm Travel Time</td>
</tr>
<tr>
<td>1st Alarm Total Reflex</td>
</tr>
</tbody>
</table>

Section 5—Recommended Solutions and Phasing Plan  

page 95
Recommendation #4: The City needs to fund a fire records system that is National Fire Incident Reporting System (NFIRS) version 5 compliant.

Recommendation #5: If, prior to the funding being available to operate a 5th fire station, the City had partial funding to increase the number of daily firefighters, it could do so by increasing Station 1 from 4 firefighters to 5 firefighters per day. This would allow either:

- A 3-person engine company to respond to medical emergencies and small fires, while the other two personnel would still cover a dedicated ladder truck and be able to respond to structure fires and technical rescue calls citywide where the crew could combine with an engine crew(s).

- Or, three personnel would staff an engine/ladder “quint” apparatus and two personnel would respond in a squad to downtown area medical emergencies.

Both of these staffing options require additional discussion with the firefighters’ representatives and making the decision on if the current “quint” should be replaced with a dedicated ladder truck.

When the City can add a 6th firefighter per day to Station 1, then split the crews into two 3-firefighter crews and open the 5th station.

In a last phase, as funding allows at the build-out of the City, the City can increase the staffing at Station 1 on the pumper/ladder unit to 4 firefighters per day, which is a much more effective team to operate a ladder truck at a serious building fire.

5.2 NON-DEPLOYMENT HEADQUARTERS FUNCTIONS FINDINGS AND RECOMMENDATIONS

A fire department San Luis Obispo’s size needs to have a management team that is the proper size, and adequately trained and supported. There are increasing regulations to be dealt with in operating fire services, and the proper hiring, training and supervision of line employees requires an equally serious commitment to leadership and general management functions.

The organization chart shows an organization that should generally meet the needs of a department the size of San Luis Obispo’s. However, due to the fiscal pressures on the City, there has been greater emphasis on staffing fire companies to provide emergency response than on the needs of the management team to coordinate and lead the organization. As the City struggled with its shrinking finances, it froze some staff positions in some of the essential fire headquarters support positions. This situation developed as an interim solution until the budget situation would improve.

Citygate understands the City’s severe fiscal situation and does not find the headquarters functions significantly insufficient. However, the following findings and recommendations do point the way for the Fire Chief and staff to first prioritize the current resources to the highest priority needs and secondly, provide a road map from which to request additional resources as the City finds the ability to provide them.

Section 5—Recommended Solutions and Phasing Plan
Finding #11: The Department’s administrative functions are in place and appropriately designed for a department this size. There is not enough clerical support staffing for the variety of programs the Department handles, but this is due to fiscal limitations, not a lack of management.

Finding #12: Given the scope of programs in the Department, the need for executive oversight of these programs, and the need for a trained, certified Fire Chief level position to back-up the on-duty Battalion Chief, the Department needs a second in command chief (Deputy Chief). The Department is not top heavy with only the Fire Chief and four Battalion Chiefs. The Fire Chief also has to manage citywide disaster preparedness, which has no staff assigned in the Department. Given all these issues, the Department is clearly large enough for a second in command to the Fire Chief, at a Deputy Chief level position.

Finding #13: The size, scope and advanced programs in the Fire Prevention programs for a City the size of San Luis Obispo are exceptional in breadth and quality. The City is making a real effort to prevent fires, which allows it to limit loss and the overall quantity of needed firefighters.

Finding #14: As with fire prevention, the public education program scope is very commendable for a department this size. There is not a clear accounting of what it costs, or what an ongoing dedicated budget appropriation should be.

Finding #15: While the City has been able to invest in a new central station and headquarters, the other three stations are 30-55 years old, and when built, were not constructed to be 50-100 year facilities. They have been given some upgrades, but more will be necessary. In other cities today, the more common size for a single fire company neighborhood station with space for reserve apparatus, separate gender areas and on-site outdoor activity space is an approximately 5,000 square foot and larger building on at least a 1+ acre site. The City will soon be facing significant repair and upgrade needs at the three neighborhood fire stations. The fire training area is crowded and produces noise and smoke at times better suited to a more outer city or industrial zone area.

Finding #16: With a life expectancy of five years, the Department should be budgeting annually for turnout replacement. This can be adjusted, and in all probability, an alternate year purchase of enough sets to maintain an overall 5-year life cycle would obtain a better price.

Finding #17: The hose program appears to be relegated to a budget status where inventory levels are too low and replacing the prematurely failing hose is problematic.

Finding #18: The breathing apparatus program, like many of the Department’s support programs is impacted by a lack of administration time.

The Department needs to have its own fit face mask testing capability as well as its own test equipment to verify vendor repairs. It could save money by doing
SCBA repairs in house if it had the bench space and tools. If the current technician is unable to fulfill his role, there is no back-up.

Finding #19: The San Luis Obispo Fire Department does not have a pre-fire plan program. They have been giving consideration to developing a system incorporating Google Earth maps but have made no progress on the project.

Finding #20: San Luis Obispo does not require certification for fire officers or chief officers. For Company Officer, the Department has an acting captain certification, which includes an Acting Captain Task Book; it is also highly recommended that company officers have the California Office of State Fire Training Company Officer Certification. The task book appears to be well thought out and designed; engineers wishing to take assignments as acting captains must complete the task book. In San Luis Obispo, promotion to chief officer is either by a four-year degree or Chief Officer Certification.

Finding #21: The Department training officer has the safety officer responsibility as a collateral duty. The Fire Department has a risk management program that appears proportionate with the size of the Department. The safety programs reference the needed source documents for training policy to current best practices.

The following recommendations for the headquarters and support functions for the San Luis Obispo Fire Department can be accomplished over time as City fiscal resources allow. These recommendations also provide the command staff the information from which to prioritize the resources, both in staff and funding that they do have.

Recommendation #6: San Luis Obispo Fire Department should switch to full-featured fire department NFIRS 5 compliant incident reporting and management records system (RMS) that will allow better management oversight of activities.

Recommendation #7: The Department needs to add an Operations Chief (Deputy Chief position) as soon as fiscally possible. There are too many large programs without enough supervision and coordination for the Fire Chief alone to handle, much less have the time to plan and be an overall effective City Department Head.

Recommendation #8: Given the economic constraints on adding more staff to fire prevention over the foreseeable life of this fire master plan, the Department may have to begin to triage its fire inspection services to the most critical occupancies if workload exceeds available staffing. Those with smaller fire code requirements and risk for fire are going to have to be inspected on a longer cycle or even be moved to a self-inspection program.

As the City grows and has increased economic resources, a workload analysis should be done on fire prevention, and as needed, additional inspection and clerical resources will probably need to be added.
Recommendation #9: Given the City’s strong commitment to prevention as evidenced by its fire sprinkler requirements, the City should continue to invest more in the wildland fuel reduction program. The City will never have enough firefighters on duty to prevent a wildland conflagration. Individual properties have to be educated on defensible space issues and the need for fuel reduction.

Recommendation #10: The public education program needs greater tracking of what programs educate the most individuals and a separate budget line item so that the appropriate resource decisions can be made.

Recommendation #11: The City should program for an extensive evaluation of its fire station and fire training building needs, and then make long-term, cost-effective Capital Improvement Project decisions to either continue to repair the three older stations, or given the small parcel sizes and ages, re-build them completely nearby.

Additionally, the City should investigate other fire training areas and partnerships with County Fire, police agencies and the colleges.

Recommendation #12: As apparatus becomes available, San Luis Obispo Fire Department should consider extending the time apparatus is in reserve status in order to build up its second alarm capability. Not including the OES engine, a duplicate of each type would seem prudent. This could be achieved by keeping F-109 about 3 more years

When Fleet Manager Dugger is due to retire, consider keeping him on as a retired annuitant for six months to work with his replacement as a good transition process.

Recommendation #13: The Department needs to develop a program for on-going replacement of protective clothing (turnouts) on a life cycle of 5-7 years for 84 sets of gear. This means an annual budget commitment of approximately $35,000.

Recommendation #14: The Department should develop a standard complement, specification, and hose replacement program. As soon as the City can find the funding it should start improving its hose inventory.

Recommendation #15: The Department needs to develop a complete breathing apparatus capital replacement plan and then identify funding for the plan.

The new SCBA system would have the following characteristics: yearly testing, for SCBA’s, integrated enhanced voice communication, CBRN compliant universal RIC/RIT connection, portable air unit and heads up display.

In the interim, the Department needs to acquire additional spare cylinders, fit-testing equipment and a test stand. It should consider...
getting a cascade and/or portable compressor system to do refills on large-scale incidents.

Consider developing greater program technician depth and have a certified technician on each shift.

Recommendation #16: The Department should develop preplans for target buildings. While a process using Google Earth or other similar process might eventually work well, a much simpler program, using the stock National Fire Academy format, could be started immediately. As part of its risk analysis, the Department self identified about 45 target hazard buildings; this divides into about twelve per station or four per shift, a very reasonable number of preplans to develop and maintain. This would provide responding companies with vital information about the target hazards before they arrive. Later on, when the Department acquires the technology, it could computerize the information in one of many available formats.

Recommendation #17: When funding is available, perhaps at the next renegotiation of the ambulance contract, the Department should consider adding an EMS Manager as a forty-hour per week position.

In conjunction with the County, the Fire Department and ambulance service should investigate successful public education programs and consider how they might provide that education with a target of reducing abuse to the system.

Recommendation #18: Continue the hydrant-testing program. Consider working with the water system enterprise fund to have the water utility rate structure cover the full annual testing and repair of fire hydrants. This program should not be a General Fund program.

Recommendation #19: The training program needs on-going executive attention. The current training officer is off to a good start, but will probably be going to shift work by the time this report is complete. The executive attention needs to be focused on four essential areas:

19.1 A training records management system that provides exception reports on a shift basis so that the Fire Chief and shift Battalion Chiefs know who is training and, more importantly, who is not training.

19.2 A Department-wide commitment to certification at all levels from Firefighter I through Fire Chief. With the chief’s modeling the behavior expected of the rest of the Department, it would not take long before everyone was certified. This is particularly important at the Driver/Operator level.

19.3 An increased focus on and participation in the essentials of firefighting, including multi-company drills, preplans followed
by chalk talks on all target hazards, and in house drills focused on the basics.

19.4 Referencing the source documents for training policy to current best practices. Doing this will ensure that the program and, more importantly, the Department is doing its best to ensure that the training received by firefighters meets or exceeds industry standards.

Recommendation #20: It would be valuable for the Department to complete the NFPA 1500 Fire Department Occupational Safety and Health Program Worksheet in NFPA 1500 Annex B. This program review will identify weaknesses in the current program and provide guidance for the Department to improve the risk management program.

5.3 PRIORITIES AND TIMING

Some of the recommendations in this planning effort requiring minimal additional resources can be worked on in parallel. Others will take several fiscal years both in time and funding. Given these two realities, Citygate recommends the following short-term priorities:

5.3.1 Priority One
- Absorb the policy recommendations of this fire services study and adopt revised fire department performance measures to drive the location and timing of fire stations.
- If one-time funding can be identified, purchase an NFIRS 5 compliant fire department integrated records system.
- When on-going funding becomes available, add an Operations Chief (Deputy Chief position).

5.3.2 Priority Two
- If one-time funding can be identified, study in-depth the older fire facilities and make long-term repair or replacement decisions.
- Begin to identify and conduct the appropriate due-diligence steps to identify and eventually secure or purchase a 5th fire station site in the southern annexation area.
- Using one-time funding or federal grants, plan for and replace the older fire hose inventory and structure fire breathing apparatus units.

5.3.3 On-Going
- Continue to support fire prevention programs, especially in the areas of wildfire and fuel reduction programs.
- As the economy recovers, look in-depth at the increased commercial construction and the need for fire code inspection services over the long term. Identify the staff impacts and plan as necessary for additional fire inspection and clerical support positions.

- When the ambulance agreement comes up for re-consideration, discuss the need for the Department to have fiscal support towards establishing a paramedic program supervisor, as a sworn or unsworn position.
TECHNICAL MEMORANDUM
City of San Luis Obispo
General Plan Update
Sensitivity Analyses of the Roadway Improvements
City of San Luis Obispo, Central Coast Transportation Consulting, Kittelson & Associates Inc.

Date: June 29, 2014
To: Jake Hudson, City of San Luis Obispo
From: Jim Damkowitch, Franklin Cai, T.E.
cc: 

As shown in Section 2.0, of the DEIR Project Description (Tables 2.4-2 and 2.5-1, respectively), the proposed LUCE Update includes sixteen potential development areas (including the South Broad Street Special Planning Area) and seventeen proposed street network changes. The latter entails changes to the physical transportation assets of the City of San Luis Obispo. This includes new roadway connections (new centerline miles of roadway), one-way to two-way conversions, realignments, over-crossings, new interchanges and road/ramp closures. A complete listing of the candidate improvements are provided on the following page.

All the listed improvements are reflected in the General Plan DEIR Maximum Build-Out alternative. Many of these improvements have been included or considered as part of past planning studies performed for or by the City of San Luis Obispo – including the existing General Plan. The project description adopted by Council included multiple options for various projects, therefore a circulation network which represented the maximum build of those options was studied and a sensitivity analysis of the various alternative options was conducted. The purpose of this memorandum is to detail the sensitivity analysis of the individual options. Using the 2035 Maximum Build-Out condition as the basis, each proposed roadway improvement was analyzed in isolation to determine its operational efficiency and impact to the surrounding street network.

The operational software SYNCHRO was used to evaluate study intersections adjacent to each improvement. Intersection LOS, turn movement LOS and 95th percentile queues were analyzed with and without the improvement. Segment LOS was also determined based on the City’s daily thresholds.

The results of each assessment informed the City which improvements should be advanced for inclusion in the proposed General Plan.
Circulation Areas of Change Considered for Inclusion for the Proposed Project:

- Prado Road (Full interchange with phased implementation)
- Bishop Extension
- Orcutt Overpass (not analyzed as part of this analysis)
- LOVR By-Pass
- Hwy 1/Hwy 101 &Broad ramp closures
- Marsh/Higuera - 2 way
- Mission Plaza Expansion
- Madonna –Realign
- Chorro & Broad – Realign
- Boysen & Santa Rosa (Includes grade-separated crossing for bike/ped. Include turn restrictions
- Bianchi/Pismo/Higuera Realignment
- New collector – Tank Farm to Buckley
- DT Transit Center (not analyzed as part of this analysis)
- Calle Joaquin connection to Dalidio Dr
- Vachel Realign (not analyzed as part of this analysis)
- Victoria Connection (not analyzed as part of this analysis)
- Broad Street – Consolidate access
The following provides the operational summaries of the adjacent facilities when the effect of each improvement is tested:

### A. Build Prado Rd. Overpass Only & Eliminate Planned Ramps

#### WITH RAMPS

<table>
<thead>
<tr>
<th>Intersections</th>
<th>AM Volume</th>
<th>AM Delay</th>
<th>AM LOS</th>
<th>Mov. Failures</th>
<th>PM Volume</th>
<th>PM Delay</th>
<th>PM LOS</th>
<th>Mov. Failures</th>
</tr>
</thead>
<tbody>
<tr>
<td>Marsh &amp; Higuera</td>
<td>2100</td>
<td>17.9</td>
<td>B</td>
<td>-</td>
<td>2607</td>
<td>86.1</td>
<td>F</td>
<td>EBT,NBR,SBT</td>
</tr>
<tr>
<td>Madonna &amp; Higuera</td>
<td>2634</td>
<td>33.8</td>
<td>C</td>
<td>-</td>
<td>3245</td>
<td>71.5</td>
<td>E</td>
<td>EBLT,NBLT, SBT</td>
</tr>
<tr>
<td>Madonna &amp; NB 101</td>
<td>1769</td>
<td>8.7</td>
<td>A</td>
<td>-</td>
<td>2191</td>
<td>18.4</td>
<td>B</td>
<td>-</td>
</tr>
<tr>
<td>Madonna &amp; SB 101</td>
<td>1965</td>
<td>23.5</td>
<td>C</td>
<td>-</td>
<td>2432</td>
<td>29.4</td>
<td>C</td>
<td>-</td>
</tr>
<tr>
<td>Prado &amp; Higuera</td>
<td>4388</td>
<td>49.1</td>
<td>D</td>
<td>WBL,NBLTR,SBLT</td>
<td>4839</td>
<td>35.6</td>
<td>D</td>
<td>NBL</td>
</tr>
<tr>
<td>LOVR &amp; Higuera</td>
<td>2451</td>
<td>17.4</td>
<td>B</td>
<td>-</td>
<td>2607</td>
<td>21.2</td>
<td>C</td>
<td>-</td>
</tr>
<tr>
<td>LOVR &amp; NB 101</td>
<td>2732</td>
<td>45.7</td>
<td>D</td>
<td>NBL</td>
<td>3781</td>
<td>57.8</td>
<td>E</td>
<td>EBT, WBL, NBL</td>
</tr>
<tr>
<td>LOVR &amp; Calle Joaquin / SB 101</td>
<td>3166</td>
<td>24.2</td>
<td>C</td>
<td>-</td>
<td>4433</td>
<td>40.3</td>
<td>D</td>
<td>WBT, SBL</td>
</tr>
</tbody>
</table>

#### WITHOUT RAMPS

<table>
<thead>
<tr>
<th>Intersections</th>
<th>AM Volume</th>
<th>AM Delay</th>
<th>AM LOS</th>
<th>Mov. Failures</th>
<th>PM Volume</th>
<th>PM Delay</th>
<th>PM LOS</th>
<th>Mov. Failures</th>
</tr>
</thead>
<tbody>
<tr>
<td>Marsh &amp; Higuera</td>
<td>2938</td>
<td>64.8</td>
<td>E</td>
<td>EBT, NBL, SBT</td>
<td>2909</td>
<td>151.1</td>
<td>F</td>
<td>EBT,NBL,SBT</td>
</tr>
<tr>
<td>Madonna &amp; Higuera</td>
<td>3400</td>
<td>104.3</td>
<td>F</td>
<td>EBLT, NBLT,SBT</td>
<td>3307</td>
<td>104.3</td>
<td>F</td>
<td>EBLT,NBLT,SBT</td>
</tr>
<tr>
<td>Madonna &amp; NB 101</td>
<td>2454</td>
<td>13.1</td>
<td>B</td>
<td>-</td>
<td>3040</td>
<td>22.6</td>
<td>C</td>
<td>-</td>
</tr>
<tr>
<td>Madonna &amp; SB 101</td>
<td>2715</td>
<td>29.2</td>
<td>C</td>
<td>-</td>
<td>3073</td>
<td>39.4</td>
<td>D</td>
<td>EBL</td>
</tr>
<tr>
<td>Prado &amp; Higuera</td>
<td>3629</td>
<td>61.5</td>
<td>E</td>
<td>WBL,NBLT,SBLT</td>
<td>3860</td>
<td>22.1</td>
<td>C</td>
<td>NBL</td>
</tr>
<tr>
<td>LOVR &amp; Higuera</td>
<td>2920</td>
<td>50.4</td>
<td>D</td>
<td>NBL</td>
<td>3105</td>
<td>44.1</td>
<td>D</td>
<td>SBR</td>
</tr>
<tr>
<td>LOVR &amp; NB 101</td>
<td>3150</td>
<td>84.1</td>
<td>F</td>
<td>EBT, WBL, NBL</td>
<td>4310</td>
<td>101.0</td>
<td>F</td>
<td>EBT,WBLT,NBLR</td>
</tr>
<tr>
<td>LOVR &amp; Calle Joaquin / SB 101</td>
<td>3445</td>
<td>30.0</td>
<td>C</td>
<td>EBL</td>
<td>4691</td>
<td>75.2</td>
<td>E</td>
<td>EBL,WBL,NBLT,SB</td>
</tr>
</tbody>
</table>

**Impacted Intersections**
Finding

Eliminating a planned full interchange redistributes traffic to the LOVR, Madonna, & Marsh/Higuera Interchanges causing volumes at those interchanges and surrounding intersection to operate below level of service thresholds. Due to these potential impacts it’s recommended that the planned full access Interchange at Prado Rd. should not change at this time. Additional detailed subarea traffic analysis will be conducted as part of adjacent development; these studies may identify other secondary improvements that would allow for the elimination of the ramps.

B. Eliminate Planned Bishop Street Extension:

<table>
<thead>
<tr>
<th>Intersections</th>
<th>AM Volume</th>
<th>AM Delay</th>
<th>AM LOS</th>
<th>Mov. Failures</th>
<th>PM Volume</th>
<th>PM Delay</th>
<th>PM LOS</th>
<th>Mov. Failures</th>
</tr>
</thead>
<tbody>
<tr>
<td>San Luis Drive &amp; Johnson</td>
<td>2099</td>
<td>21</td>
<td>C</td>
<td>-</td>
<td>2267</td>
<td>18</td>
<td>B</td>
<td>-</td>
</tr>
<tr>
<td>Broad &amp; Orcutt</td>
<td>3127</td>
<td>18</td>
<td>B</td>
<td>NBL</td>
<td>388</td>
<td>27</td>
<td>C</td>
<td>SBL</td>
</tr>
<tr>
<td>Broad &amp; South / Santa Barbara</td>
<td>3868</td>
<td>106</td>
<td>F</td>
<td>ALL</td>
<td>3918</td>
<td>52</td>
<td>D</td>
<td>EBT,WBL,WBT,NBL,SBL</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Segments</th>
<th>Average Daily Traffic</th>
<th>Max. Threshold</th>
<th>Exceeds Threshold</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pismo</td>
<td>4,000</td>
<td>3,000</td>
<td>YES</td>
</tr>
<tr>
<td>Buchon</td>
<td>3,000</td>
<td>3,000</td>
<td>NO</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Intersections</th>
<th>AM Volume</th>
<th>AM Delay</th>
<th>AM LOS</th>
<th>Mov. Failures</th>
<th>PM Volume</th>
<th>PM Delay</th>
<th>PM LOS</th>
<th>Mov. Failures</th>
</tr>
</thead>
<tbody>
<tr>
<td>San Luis Drive &amp; Johnson</td>
<td>2334</td>
<td>21.5</td>
<td>C</td>
<td>-</td>
<td>2267</td>
<td>18</td>
<td>B</td>
<td>-</td>
</tr>
<tr>
<td>Broad &amp; Orcutt</td>
<td>3033</td>
<td>19.7</td>
<td>B</td>
<td>NBL</td>
<td>388</td>
<td>27</td>
<td>C</td>
<td>SBL</td>
</tr>
<tr>
<td>Broad &amp; South / Santa Barbara</td>
<td>3663</td>
<td>54.4</td>
<td>D</td>
<td>EBT,WBLT,NBL,BSLT</td>
<td>3918</td>
<td>52</td>
<td>D</td>
<td>EBT,WBL,WBT,NBL,SBL</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Segments</th>
<th>Average Daily Traffic</th>
<th>Max. Threshold</th>
<th>Exceeds Threshold</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pismo</td>
<td>6,000</td>
<td>3,000</td>
<td>YES</td>
</tr>
<tr>
<td>Buchon</td>
<td>4,000</td>
<td>3,000</td>
<td>YES</td>
</tr>
</tbody>
</table>

**Impacted Intersections/Segments**
Traffic Redistribution Resulting From Elimination of Extension:

Finding

Elimination of the planned Bishop Street Connection would reduce projected traffic congestion at Broad & South/Santa Barbara to acceptable levels. However, elimination of the extension would also push additional traffic into the Pismo & Buchon neighborhoods such that volumes would exceed acceptable levels. Therefore it’s recommended that the planned Bishop Street extension not be changed at this time. Given the cost, design difficulties, and other operational improvements it’s also suggested that the following policy be added:

“The City shall conduct a detailed subarea traffic analysis to determine if secondary measures can be made to allow for elimination of the Bishop Street Extension and protection of neighborhood traffic levels.”
C. **Eliminate Planned Orcutt Railroad Overpass**

**Finding**

The Orcutt Railroad Overpass was initially planned in order to address delays resulting for trains stopped on the tracks blocking traffic. Since this plan was adopted rail traffic has changed and these types of occurrences are now rare. Also interim improvements have been implemented that fully address all current and forecasted operations. However, because rail traffic is outside the City’s control and could resume to prior conditions, changing the current planned overpass is not recommended at this time.

D. **Add Los Osos Valley Road Bypass**

<table>
<thead>
<tr>
<th>Intersections</th>
<th>AM Volume</th>
<th>AM Delay</th>
<th>AM LOS</th>
<th>Mov. Failures</th>
<th>PM Volume</th>
<th>PM Delay</th>
<th>PM LOS</th>
<th>Mov. Failures</th>
</tr>
</thead>
<tbody>
<tr>
<td>Buckley &amp; Bypass</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>LOVR &amp; Higuera</td>
<td>2549</td>
<td>20</td>
<td>C</td>
<td>None</td>
<td>3658</td>
<td>87</td>
<td>F</td>
<td>NBL,SBTR</td>
</tr>
<tr>
<td>Bypass &amp; LOVR</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Intersections</th>
<th>AM Volume</th>
<th>AM Delay</th>
<th>AM LOS</th>
<th>Mov. Failures</th>
<th>PM Volume</th>
<th>PM Delay</th>
<th>PM LOS</th>
<th>Mov. Failures</th>
</tr>
</thead>
<tbody>
<tr>
<td>Buckley &amp; Bypass</td>
<td>1370</td>
<td>14</td>
<td>B</td>
<td>-</td>
<td>2180</td>
<td>18</td>
<td>B</td>
<td>-</td>
</tr>
<tr>
<td>LOVR &amp; Higuera</td>
<td>2229</td>
<td>13</td>
<td>B</td>
<td>-</td>
<td>2627</td>
<td>21</td>
<td>C</td>
<td>-</td>
</tr>
<tr>
<td>Bypass &amp; LOVR</td>
<td>1860</td>
<td>11</td>
<td>B</td>
<td>-</td>
<td>2770</td>
<td>29</td>
<td>C</td>
<td>NBL</td>
</tr>
</tbody>
</table>
Traffic Redistribution Resulting From Addition of Bypass:

Finding

Addition of the LOVR Bypass improves the intersection operations of LOVR & Higuera, however other smaller scale measures already identified as part of the Chevron draft EIR accomplish a similar improvement. A bypass would reduce delays for residents exiting Los Verdes and a roadway in this area would be needed to provide access to development along this corridor. However, the bypass would have potential creek, noise, and farmland impacts. Also the Bypass would be an overall net neutral circulation project with a low cost/benefit ratio. Therefore based on the potential impacts and localized benefit it’s not recommended that a roadway be site planned and approved as a capital project at this point. Rather it’s recommended that the following policy be added to allow for planning and implementation of a roadway as part of adjacent development:

"Development within the area bound by Hwy 101, Los Osos Valley Road, & Higuera street shall incorporate a new roadway connection in some form from Los Osos Valley Road to Higuera."
### E. Add Interchange Upgrades at SR-1 and SR-101

**WITHOUT INTERCHANGE UPGRADES**

<table>
<thead>
<tr>
<th>Intersections</th>
<th>AM Volume</th>
<th>AM Delay</th>
<th>AM LOS</th>
<th>Mov. Failures</th>
<th>PM Volume</th>
<th>PM Delay</th>
<th>PM LOS</th>
<th>Mov. Failures</th>
</tr>
</thead>
<tbody>
<tr>
<td>Santa Rosa &amp; Olive</td>
<td>3162</td>
<td>20.9</td>
<td>C</td>
<td>SBL</td>
<td>3705</td>
<td>15.4</td>
<td>B</td>
<td></td>
</tr>
<tr>
<td>Santa Rosa &amp; Walnut</td>
<td>2622</td>
<td>42.1</td>
<td>D</td>
<td>WBR</td>
<td>2891</td>
<td>43.8</td>
<td>D</td>
<td>WBR, SBL</td>
</tr>
<tr>
<td>Hwy 1 &amp; 101</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Local/Collector Segments</th>
<th>Average Daily Traffic</th>
<th>Max. Threshold</th>
<th>Exceeds Threshold</th>
</tr>
</thead>
<tbody>
<tr>
<td>Walnut E/ Santa Rosa</td>
<td>9,000</td>
<td>3,000</td>
<td>YES</td>
</tr>
<tr>
<td>Olive E/ Santa Rosa</td>
<td>4,000</td>
<td>5,000</td>
<td>YES</td>
</tr>
<tr>
<td>Walnut W/ Santa Rosa</td>
<td>10,100</td>
<td>3,000</td>
<td>YES</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Arterial Segments</th>
<th>Average Daily Traffic</th>
<th>LOS</th>
<th>Exceeds Threshold</th>
</tr>
</thead>
<tbody>
<tr>
<td>Olive W/ Santa Rosa</td>
<td>10,200</td>
<td>C</td>
<td>NO</td>
</tr>
<tr>
<td>Santa Rosa N/ 101</td>
<td>44,000</td>
<td>F</td>
<td>YES</td>
</tr>
<tr>
<td>Santa Rosa S/ 101</td>
<td>23,000</td>
<td>D</td>
<td>NO</td>
</tr>
</tbody>
</table>

**WITH INTERCHANGE UPGRADES**

<table>
<thead>
<tr>
<th>Intersections</th>
<th>AM Volume</th>
<th>AM Delay</th>
<th>AM LOS</th>
<th>Mov. Failures</th>
<th>PM Volume</th>
<th>PM Delay</th>
<th>PM LOS</th>
<th>Mov. Failures</th>
</tr>
</thead>
<tbody>
<tr>
<td>Santa Rosa &amp; Olive</td>
<td>3282</td>
<td>14.3</td>
<td>B</td>
<td>-</td>
<td>4186</td>
<td>2.3</td>
<td>C</td>
<td>NBL</td>
</tr>
<tr>
<td>Santa Rosa &amp; Walnut</td>
<td>2200</td>
<td>15</td>
<td>B</td>
<td>-</td>
<td>2434</td>
<td>15.6</td>
<td>B</td>
<td></td>
</tr>
<tr>
<td>Hwy 1 &amp; 101</td>
<td>5667</td>
<td>34.1</td>
<td>C</td>
<td>SBL, NBL</td>
<td>5655</td>
<td>45.9</td>
<td>D</td>
<td>SBL, NBL</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Local/Collector Segments</th>
<th>Average Daily Traffic</th>
<th>Max. Threshold</th>
<th>Exceeds Threshold</th>
</tr>
</thead>
<tbody>
<tr>
<td>Walnut E/ Santa Rosa</td>
<td>5,200</td>
<td>3,000</td>
<td>YES</td>
</tr>
<tr>
<td>Olive E/ Santa Rosa</td>
<td>2,000</td>
<td>5,000</td>
<td>NO</td>
</tr>
<tr>
<td>Walnut W/ Santa Rosa</td>
<td>7,600</td>
<td>3,000</td>
<td>YES</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Arterial Segments</th>
<th>Average Daily Traffic</th>
<th>LOS</th>
<th>Exceeds Threshold</th>
</tr>
</thead>
<tbody>
<tr>
<td>Olive W/ Santa Rosa</td>
<td>2,200</td>
<td>A</td>
<td>NO</td>
</tr>
<tr>
<td>Santa Rosa N/ 101</td>
<td>48,000</td>
<td>F</td>
<td>YES</td>
</tr>
<tr>
<td>Santa Rosa S/ 101</td>
<td>30,000</td>
<td>D</td>
<td>NO</td>
</tr>
</tbody>
</table>
Traffic Redistribution with Interchange Upgrades:

Finding

The current interchange is projected to have many operational issues and neighborhood impacts by 2035, upgrades to the interchange such as conversion to a signal point urban interchange lessen these impacts and operational issues. Therefore it's recommended that this be added as a project.
F. Convert Higuera Street and Marsh Street between Santa Rosa Street and Johnson Ave:

<table>
<thead>
<tr>
<th>Intersections</th>
<th>AM Volume</th>
<th>AM Delay</th>
<th>AM LOS</th>
<th>Mov. Failures</th>
<th>PM Volume</th>
<th>PM Delay</th>
<th>PM LOS</th>
<th>Mov. Failures</th>
</tr>
</thead>
<tbody>
<tr>
<td>Johnson &amp; Marsh</td>
<td>849</td>
<td>27.1</td>
<td>C</td>
<td>-</td>
<td>1337</td>
<td>44.6</td>
<td>D</td>
<td>-</td>
</tr>
<tr>
<td>Johnson &amp; Higuera</td>
<td>914</td>
<td>14.6</td>
<td>B</td>
<td>-</td>
<td>1030</td>
<td>17.5</td>
<td>C</td>
<td>-</td>
</tr>
<tr>
<td>Santa Rosa &amp; Marsh</td>
<td>1192</td>
<td>10.7</td>
<td>B</td>
<td>-</td>
<td>2062</td>
<td>10.6</td>
<td>B</td>
<td>-</td>
</tr>
<tr>
<td>Santa Rosa &amp; Higuera</td>
<td>1807</td>
<td>5.2</td>
<td>A</td>
<td>-</td>
<td>2382</td>
<td>6.7</td>
<td>A</td>
<td>-</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Segments</th>
<th>Average Daily Traffic</th>
<th>LOS</th>
<th>Exceeds Threshold</th>
</tr>
</thead>
<tbody>
<tr>
<td>Marsh</td>
<td>5,000</td>
<td>A</td>
<td>NO</td>
</tr>
<tr>
<td>Higuera</td>
<td>2,800</td>
<td>A</td>
<td>NO</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Intersections</th>
<th>AM Volume</th>
<th>AM Delay</th>
<th>AM LOS</th>
<th>Mov. Failures</th>
<th>PM Volume</th>
<th>PM Delay</th>
<th>PM LOS</th>
<th>Mov. Failures</th>
</tr>
</thead>
<tbody>
<tr>
<td>Johnson &amp; Marsh</td>
<td>831</td>
<td>6.8</td>
<td>A</td>
<td>-</td>
<td>1360</td>
<td>16.6</td>
<td>B</td>
<td>-</td>
</tr>
<tr>
<td>Johnson &amp; Higuera</td>
<td>844</td>
<td>19.7</td>
<td>C</td>
<td>-</td>
<td>1063</td>
<td>32.3</td>
<td>D</td>
<td>-</td>
</tr>
<tr>
<td>Santa Rosa &amp; Marsh</td>
<td>1343</td>
<td>12.3</td>
<td>B</td>
<td>-</td>
<td>2289</td>
<td>10.8</td>
<td>B</td>
<td>-</td>
</tr>
<tr>
<td>Santa Rosa &amp; Higuera</td>
<td>831</td>
<td>5.1</td>
<td>A</td>
<td>-</td>
<td>2636</td>
<td>8.1</td>
<td>A</td>
<td>-</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Segments</th>
<th>Average Daily Traffic</th>
<th>LOS</th>
<th>Exceeds Threshold</th>
</tr>
</thead>
<tbody>
<tr>
<td>Marsh</td>
<td>10,000</td>
<td>C</td>
<td>NO</td>
</tr>
<tr>
<td>Higuera</td>
<td>4,000</td>
<td>B</td>
<td>NO</td>
</tr>
</tbody>
</table>

Finding

Currently Marsh & Higuera streets between Johnson & Santa Rosa are underutilized and under developed while parallel neighborhood streets are exceeding volume thresholds. Conversion of these streets from one-way to two-way will improve their utilization and draw some traffic from parallel neighborhood streets. Intersections and segments can operationally accommodate the conversion. Therefore it’s recommended that this be added as a project.
G. Expand Mission Plaza:

LOS & Daily Volumes With Mission Plaza Expansion:

[Map of the area with annotations and a legend for LOS and volume bandwidths]
Traffic Redistribution with Mission Plaza expansion:

Finding

Expansion of the Mission Plaza causes minor to moderate redistributions of traffic within the downtown. Nipomo St. exceeds its level of service threshold on isolated blocks; however, the expansion improves pedestrian access & safety and enhances the downtown atmosphere. Overall the expansion of Mission Plaza can be accommodated with the current street network. Therefore it’s recommended that this be added as a project.
H. **Realign Madonna at Higuera:**

**LOS & Daily Volumes with Realignment:**

![Diagram of Madonna at Higuera with LOS and daily volumes]

```
<table>
<thead>
<tr>
<th>LOS</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>(713)</td>
</tr>
<tr>
<td>B</td>
<td>(205)</td>
</tr>
<tr>
<td>C</td>
<td>(121)</td>
</tr>
<tr>
<td>D</td>
<td>(124)</td>
</tr>
<tr>
<td>E</td>
<td>(133)</td>
</tr>
<tr>
<td>F</td>
<td>(217)</td>
</tr>
<tr>
<td>n/a</td>
<td>(752)</td>
</tr>
<tr>
<td>Other</td>
<td>(2243)</td>
</tr>
</tbody>
</table>
```

**Volume Bandwidths**

```
<table>
<thead>
<tr>
<th>Volume Bandwidths</th>
</tr>
</thead>
<tbody>
<tr>
<td>0</td>
</tr>
<tr>
<td>0.05</td>
</tr>
<tr>
<td>0.075</td>
</tr>
</tbody>
</table>
```

Miles
Finding

Realignment of Madonna at Higuera is primarily just a geometric modification resulting in an overall net neutral circulation change and a low cost/benefit ratio. However, the project would improve intersection alignment, safety, and operations. Also the realignment could facilitate greater development of the two adjacent properties. Therefore based on the localized benefit it's not recommended that realignment be site planned and approved as a capital project at this point. Rather it's recommended that the following policy be added to allow for planning and implementation as part of adjacent development:

"Development of the properties North and South of Madonna Rd. West of Higuera shall incorporate a detailed geometric analysis and associated improvements for Madonna Road west of Higuera and the intersection of Higuera and Madonna"
I. **Realign Bread, Chorro, & Boysen at Foothill**:

**LOS & Daily Volumes With Realignments:**

![Map showing traffic volumes with realignments at Foothill.](image-url)
Traffic Redistribution with Realignments:

Finding

Realignment causes volumes to decrease on Broad & Santa Rosa but increase on Chorro Street such that Chorro Street exceeds Neighborhood volume thresholds. Some form of realignment of Broac & Chorro would improve intersection operations and safety. Also the grade separated pedestrian crossing would provide improved access to & from residential neighborhoods and the commercial center to CalPoly. The grade separated pedestrian is recommended to be included as a project, however due to the potential neighborhood impacts it’s not recommended that realignments be site planned and approved as a capital project at this point. Rather it’s recommended that the following policy be added to guide adjacent development:

"Development of University Square shall incorporate a detailed geometric analysis and associated improvements for the intersections of Boysen & Santa Rosa, Foothill & Chorro, and Foothill &Broad in addition to any driveway access points along Foothill Blvd."

Kittelson & Associates, Inc. Sacramento, CA
J. **Realign High & Pismo at Higuera:**

![LOS & Daily Volumes With Realignments](image_url)
Finding

Realignment of High & Pismo at Higuera is primarily a localized geometric modification resulting in an overall net neutral circulation change and a low public cost/benefit ratio. However, the project would improve intersection alignment, safety, and operations. Therefore based on the localized benefit and property impacts it's not recommended that realignment be site planned and approved as a capital project at this point. Rather it's recommended that the following policy be added to allow for planning and implementation of a roadway as part of adjacent development:

"Re-Development of properties at the intersection of High & Pismo at Higuera shall incorporate a detailed geometric analysis and associated improvements"
K. Add New North/South Collector Between Tank Farm & Buckley

LOS & Daily Volumes with New Connection:
Traffic Redistribution with New Connection:

Finding

A new North/South collector between Buckley and Tank Farm provides additional access to Avila Ranch and adjacent properties and reliefs traffic congestion along S. Higuera Street. Therefore it’s recommended that this be added as a project. There may be portions of this road that will be planned and constructed as part of new development in the area.
L. **DT Transit Center**

Preliminary modeling of the transit center showed that there was negligible impact on overall transit forecasts as a result of relocation or consolidation. However, consolidation of the transit center is predicted to have significant operational benefits. Therefore, it’s recommended that this be added as a project that will occur in cooperation with SLOCOG and RTA.

M. **Extend Calle Joaquin to Froom or Prado Rd.**

**LOS & Daily Volumes with New Connection:**
The Calle Lozbin extension to Froom Ranch Way does not draw enough traffic to warrant this new connection. It's not recommended that this be included as a project or policy.
N. Vachel Realignment

This option is primarily a localized geometric modification and when coupled with the Buckley road connection would have negligible impact on overall circulation. Therefore it’s not recommended that this be included as a project or policy.

O. Victoria Avenue Connection

The traffic analysis from the prior Broad St. Corridor Plan draft EIR remains valid in regards to the Victoria Ave. extension. The extension provides and alternate NB route to Broad Street thereby reducing Broad Street congestion and improving local access. It’s recommended that this improvement be carried forward in the General Plan.
Response to Comment P10-1
Thank you for the additional information regarding the results of previous testing for pesticide and hydrocarbon contamination. The referenced testing did not detect these contaminants, however, as noted by the Draft EIR due to the operation of the former tank farm there is a potential for construction activities on the Avila Ranch Specific Plan site to encounter previously undetected pollutants.

Response to Comment P10-2
The commenter provides information related to airport hazards in the Draft EIR as noted in A-G below.

a) The commenter noted that Avila Ranch could be compliant with ALUP Safety Zone 2 because lower density is proposed under the draft policies for the specific plan than in the existing Safety Zone 2 of the ALUP. Restricting development on the Avila Ranch property to areas outside the ALUP mapped 55 dBA contour line and ALUP Safety Zone 2, could result in development compliant with the ALUP. The Land Use Impact Evaluation of the EIR described that changing the type of development in the area would have the potential to be consistent with ALUP noise, density and intensity standards. No further response is required.

b) The commenter noted that property encompassed by the Avila Ranch Specific Plan area contains an open land area of 2,500’ by 300’ buffer area along Buckley Road to mitigate safety impacts. The discussion for the Avila Ranch Specific Plan area recognizes this open land area in the discussion under the Hazards section of the EIR and indicates this particular buffer is in direct alignment with Runway 7/25, a desirable feature for open land areas associated with airport safety. No further response is required.

c) The commenter noted the DEIR cannot rely on consistency with the ALUP because maps are not consistent with policies, noise contours do not accurately reflect airport operations, and there are substantial deficiencies in the base map. The EIR provided an in-depth analysis of the Airport Land Use Plan as well as development supported by the LUCE update in light of the State Aeronautics Act and the Caltrans Division of Aeronautics Airport Land Use Planning Handbook requirements. The evaluation was supported by accurately locating airport runways and Handbook safety zones through Geographic Information Systems work off of surveyed points. Development concepts proposed in the LUCE and supported by an Airport Overlay Zone are consistent with state direction and guidance and are adequate to protect the public from noise and safety impacts associated with aircraft operations. Safety zones designated in the ALUP are not accurately aligned with the San Luis Obispo Airport runways and do not reflect runway length changes constructed in recent years and depicted on the FAA-approved Airport Layout Plan (ALP). State law requires the ALUP to be consistent with the Airport Master Plan, the ALP, and the FAA-approved Terminal Area Forecast (TAF). The ALUP is not consistent with these and was not used as the benchmark by which to evaluate environmental impacts associated with hazards or noise.

d) The commenter noted Government code Section 65300 et seq. requires the ALUP map to be an accurate expression of plan’s policies therefore the ALUP is non-compliant with this requirement because dimensions referenced in policies and locations of runways do not correspond on map. This comment relates to the merits of the ALUP as the basis for evaluating compliance with airport operation concerns. This comment has been noted and the intent of the comment has been answered above.

e) The commenter noted the DEIR should indicate that noise and safety impacts associated with airport operations is to be based on Handbook guidance. CEQA §21096 says Handbook shall be utilized as a technical resource for EIR evaluation of safety and noise associated with airport operations. Appendix F in Volume IV of the EIR uses the Handbook guidance regarding noise and safety in evaluating potential constraints to development in the LUCE update. The EIR did use the Handbook for purposes of evaluating potential aviation safety and noise impacts, however this isn’t clear in the discussion in the EIR. CEQA §21096 provisions will be noted in the Appendix of the FEIR.

f) The commenter noted that the Handbook Safety Zones and proposed airport overlay zone are consistent, therefore the EIR should result in a finding of no significant impact. The City concurs. The LUCE update policies,
programs, and implementation are designed to demonstrate compliance with Section 3.5 of the State Aeronautics Act, as stated in Section 21670 to protect the public’s “exposure to excessive noise and safety hazards within areas around public airports to the extent that these areas are not already devoted to incompatible uses.” Demonstrating compliance with the State Aeronautics Act requires the City to describe in detail how procedures, development standards and uses, overlay zones, airspace protection, noise, overflight notice and open land objectives will be addressed. The City concurs that persuasive evidence has not been submitted to indicate that the LUCE update may have a significant impact relative to safety, noise, airport land use compatibility or any other component of the environment. The Final EIR characterizes the Land Use policy conflict as Class 3, less than significant.

g) The commenter notes the discussion of draft performance standards for Avila Ranch and how they comply with overlay zone and handbook zones. This comment provides general support for the proposed LUCE Update project as it relates to Avila Ranch. The comment has been noted and will be provided to the Planning Commission and City Council for consideration in the decision making process.

Response to Comment P10-3

The analysis of potential LUCE Update fire protection impacts provided by the Draft EIR includes two separate evaluation components. The first component is described on page 4-294 and indicates “Increased service demands would have the potential to result in a significant environmental impact if new or physically altered fire service facilities would be required to ensure that the City’s four minute response standard was achieved.” The analysis subsequently determined that development identified by the proposed LUCE Update would increase the demand for fire protection services and that environmental impacts likely to result from the construction of a new fire station in the southern portion of the city to address the increase demand would be reduced to a less than significant level with the implementation of applicable general plan policies.

The second analysis component is based on the requirements of CEQA Guidelines Appendix G, Section X.b, which indicates that a project would have the potential to result in a significant environmental impact if it would “Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.” Potential fire protection impacts related to compliance with this CEQA threshold standard were provided in the Impact PS-1 (fire protection) subsection for continuity with the remainder of the fire protection impact analysis. The analysis provided by the Draft EIR related to this CEQA threshold standard was based primarily on information provided by: the more recent 2009 Fire Master Plan rather than information provided by the older (2003) Margarita and Airport Area EIR; Safety Element Policy 3a, which requires that “adequate” fire protection services be available to serve new development; Safety Element Program 9.3A, which establishes a fire department response time standard of four minutes; and proposed Land Use Element Policy 8.3.2.6, which applies specifically to the proposed Avila Ranch Specific Plan.

The impact analysis provided by the Draft EIR indicates that the lack of four-minute response coverage in the southern portion of the City was identified by the Fire Master Plan, which recommended adding a fifth fire station and crew to improve response times. Additional clarification of the “response time” and “travel time” standards was provided in Draft EIR Section 4.13.1a (Fire Protection Services). The Draft EIR determined that some development identified by the proposed Land Use Element, such as the Avila Ranch Specific Plan, would result in fire service policy conflicts due to the location of new development beyond the Fire Department’s four-minute response time. Non-compliance with the four-minute response standard could result in a finding of inconsistency with Safety Element Policy 3a, which was adopted with the intent of reducing potential fire service-related impacts to a less than significant level. However, the existing permissive language of the policy does not require that new development be consistent with the policy. To minimize the potential for new development in the southern portion of the city to result in a policy consistency/adequate fire protection impact, and provide an adequate mitigation measure under the requirements of CEQA, Draft EIR mitigation measure PS-1 proposes that the wording of Safety Element Policy 3a be revised such that a finding of policy consistency (adequate fire protection services must be available) be made prior to approving a proposed development project. Mitigation measure PS-1 has been proposed to ensure consistency with the fire hazard reduction/adequate fire protection service requirements of Safety Element Policy 3a, rather than the requirements of the Fire Master Plan.
This comment also provides suggestions for the revision of or edits to the City’s Existing Safety Element related to the recommendations of the Fire Master Plan. Changes to the Fire Master Plan would be a separate project not related to the consideration and possible adoption of the proposed LUCE Update. Although the information provided by this comment does not pertain directly to the adequacy of the environmental impact analysis provided by the Draft EIR, the comment has been noted in Appendix of the Final EIR and will be provided to the Planning Commission and City Council for consideration in the decision-making process.

The analysis provided by the Draft EIR indicates that Fire Department response time deficiencies would occur in the southern portion of the City. Consequently, it may be inferred that properties in the southern portion of the City would be the primary beneficiaries of developing a new fire station. However, the proposed policy identified by mitigation measure PS-1 would apply city-wide and it is not appropriate for the EIR to identify specific properties that would derive benefit from the construction and operation of a new fire station.

In addition, neither the existing Safety Element Policy 3a, nor the revised language for that policy proposed by mitigation measure PS-1, prescribe how “adequate” fire protection services are to be provided. However, the existing and proposed policy language indicates that fire service adequacy will consider factors such as the “setting, type, intensity, and form of the proposed development. An assessment of what constitutes adequate fire protection service would be conducted as part of a project-specific environmental review, which would be required for future development consistent with the requirements of CEQA and City Policy 12.3.11 Environmental Review.

Please also refer to Master Response #2, Programmatic Nature of the EIR.

With respect to response times, a detailed assessment of Fire Department response times to a particular Specific Plan location would be influenced by the design and configuration of roadways on the Specific Plan site. Therefore, a response time analysis would be conducted as part of the project-specific environmental review required for future development consistent with the requirements of CEQA and City Policy 12.3.11 Environmental Review.

Please also refer to Master Response #2, Programmatic Nature of the EIR.

Concerning application of city-wide mitigation for fire safety, proposed mitigation measure PS-1, which would revise an existing Safety Element policy, would apply city-wide and is not specifically directed at any particular development project.

The commenter also provides a general opinion regarding the financing and implementation of a new fire station in the southern portion of the City. Although the information provided by this comment does not pertain directly to the adequacy of the environmental impact analysis provided in the Draft EIR, the comment has been noted and will be provided to the Planning Commission and City Council for consideration in the decision-making process.

With respect to fire service impacts in the southern portion of the city, the Draft EIR indicated that the development of projects in the southern portion of the city have the potential to result in fire protection policy inconsistencies/fire service-related impacts. The EIR does not provide a detailed evaluation of incremental fire service impacts that could result from individual future development projects. A detailed assessment of potential incremental/cumulative fire protection service impacts would be conducted as part of a project-specific environmental review, which would be required for future development consistent with the requirements of CEQA and City Policy 12.3.11 Environmental Review.

Please also refer to Master Response #2, Programmatic Nature of the EIR.
Both existing Safety Element Policy 3a and proposed mitigation measure PS-1 indicate that adequate fire suppression services and facilities are to be available or be made available concurrent with development. The term “concurrent” may be interpreted to require that adequate and functional fire protection service be available to serve new development prior to the start of flammable construction, or prior to unit occupancy. Based on the setting, type, intensity, and form of the proposed development, other requirements for providing adequate fire service may be deemed appropriate by the Fire Department.

The commenter also provides suggestions for the revision of or edits to the proposed LUCE Update as it relates to financing future fire station improvements in the city. Although the information provided by this comment does not pertain to the adequacy of the environmental impact analysis provided by the Draft EIR, the comment has been noted in Appendix of the Final EIR and will be provided to the Planning Commission and City Council for consideration in the decision-making process.

Please also refer to Master Response #1, Comments Specific to the LUCE Update Concepts and/or Policies.

This commenter also provides a general opinion regarding the provision of future fire station improvements and is generally consistent with response P10-3e above. Although the information provided by this comment does not pertain to the adequacy of the environmental impact analysis provided in the Draft EIR, the comment has been noted and will be provided to the Planning Commission and City Council for consideration in the decision-making process.

The commenter also provides the suggestion that the City Council should adopt the Fire Master Plan. The Fire Master Plan is a planning level document that identifies longer term needs but does not commit the City to timing related to facilities anticipated to be needed for build-out. It was presented to the Council in 2009 and is used by the City for guidance. Although the information provided by this comment does not pertain to the adequacy of the environmental impact analysis provided in the Draft EIR, the comment has been noted and will be provided to the Planning Commission and City Council for consideration in the decision making process.

Response to Comment P10-4

The commenter requests that technical information contained in traffic studies for the Avila Ranch development be included in the LUCE Update EIR to avoid duplication and possible inconsistencies. The commenter also indicates concern that Appendix N provides inadequate information for Circulation Alternatives No. 1 through 3. Namely, the commenter indicates that the Buckley Extension is included in the LUCE EIR Functional Classification Map but is not included as part of Appendix N and that various discrepancies appear in the model plots provided in Appendix N.

The City is closely monitoring the Avila Ranch development relative to the associated technical studies, and this development is reflected in the City’s LUCE Update EIR travel demand modeling analysis. The Buckley Extension project is already adopted in the current general plan and no alternative includes modification of this extension. The LUCE Update EIR traffic analysis assumed this as a background cumulative project; therefore, this was specifically analyzed in the Sensitivity Analysis of Roadway Improvements (i.e. similar to the Prado Extension improvement). The various discrepancies noted by the commenter are a result of comparing “raw” model volume output plots to final processed output appropriate for operational analysis, which is not the intended purpose of raw model volumes. Operational results are provided in tabular form only.

To clarify, the following text will be added to the bottom of page N-2 of Appendix N:

The “raw” model volume plots merely provide a visual indication of the relative redistribution of traffic resulting from a given infrastructure change. Similarly, the model networks are intended to be schematic to illustrate future network connections and should not be construed as precise plan lines.
Begin forwarded message:

From: debbie farwell <dif53@earthlink.net>
Date: July 27, 2014 at 10:44:33 PM PDT
To: "Mejia, Anthony" <amejia@slocity.org>, "Marx, Jan" <jmarx@slocity.org>,
"Carpenter, Dan" <dcarpenter@slocity.org>, "Christianson, Carlyn"
<ecristianson@slocity.org>, "Smith, Kathy" <ksmith@slocity.org>,
"Ashbaugh, John" <jashbaugh@slocity.org>
Subject: Public comments regarding Draft EIR for LUCE Update

July 27, 2014
Mayor Marks and Members of the San Luis Obispo City Council,

For the last 6 weeks I’ve been reading the Draft EIR for the LUCE Update. I’ve reviewed the huge stack of related material and tried to understand the reasons for the policy changes that will be part of the new update. I’ve tried to craft some logical and clear points to address in a response that expresses my concerns about the Draft EIR of the LUCE Update. I have been unsuccessful and it weighs heavily on my soul.

In my Jan. 9, 2014 letter to Kim Murry, for the Notice Of Preparation for the LUCE Update EIR, I listed 7 specific concerns to be addressed. Except for smells, all of the remaining conditions fall under the Potential Environmental Impacts to be Assessed in the EIR process. In discussion with neighbors, we are concerned about: protection of existing waterways; increased density; threats to supportive biological environments; noise; hazardous waste from tourist related garbage storage; light pollution into resident homes; blocking view shed and sunlight of existing homes and odors related to restaurant food preparation. These conditions already exist and with the LUCE Update, these conditions will worsen as a result of anticipated infill and redevelopment in my
neighborhood.

Despite the repeated Staff comments that there is, “no physical land use changes proposed”, there will be increased density: by combining lots ("the City will work with developers to assemble adjacent properties into lots of suitable size for redevelopment"); more restaurants ("the City will promote restaurant development in the Upper Monterey area and include outdoor dining opportunities"); larger hotels and conference centers ("the City will work with local hotels and Cal Poly to develop enhanced meeting rooms and conference facilities"). The promotion of these greater density uses will put our small neighborhood at risk.

As I read the zoning map, along Monterey and Palm Street, we are zoned: R-2, R-3, Office, Tourist Commercial, Community Commercial and Downtown Commercial. A large variety of new development could take place without zoning changes. There are numerous long-time (15 to 40 year) residents living in small houses scattered between offices and businesses. Most of us like living downtown, in a mixed-use environment. But we also know that the lines between our homes and the businesses next door are precariously balanced.

Back in Jan. 2012, Mayor Marx told Staff and the LUCE Task Force the “Council has repeatedly stated that the process is to be resident-centered”. That sounds good on paper, however observing the City Council Meetings over the last 7 months I have little trust in the LUCE process as it has evolved.

From my City Council observations, tourist/business related money has driven the LUCE Update. How many advisory committees exist to promote tourism and business? One has to consider the intentions of the speakers who address the Council. Are the speakers altruistically concerned about community? Or is there a personal financial gain involved in the presentation? There is too little heard (thank you Dan Carpenter,) about “living within one’s means”. Taking care of existing debt and problems before creating additional, ill-conceived projects ie: Prado Road extensions; numerous in-lieu parking solutions and traffic enhancements. Using lots of words to cover real intentions is deceptive, although an all-too-common technique to confuse and muddy the water. When neighbors must file litigation in order to protect their homes, something is wrong. When the City must create a special, paid committee to clarify and make transparent how it spends tax money, something is wrong. As resident citizens’ become increasingly disenfranchised, there is less trust in the process.
I do not trust that I will receive notice of future planned developments in my neighborhood in a timely or understandable manner. I find the language within the LUCE Update documents unclear and too easily manipulated. I am among the shrinking numbers of owner occupied residents who feel threatened by the loss of quality of life in San Luis Obispo. Increased tourist/business density will negatively impact my home and daily existence. My community is not a commodity to be rebranded and sold to the highest bidder for profit. My values are not open to outside reinterpretation.

I know that many sincere folks have worked long and hard on the LUCE Update. I appreciate and thank them for their work. My concern is that this Update promotes development over the health and welfare of the neighborhoods in proximity to development. As I do not see my written N.O.P. of EIR concerns addressed by the Draft EIR, I will attach a copy of my original Jan. 9, 2014 letter to be reconsidered as part of the Draft EIR LUCE Update. I appreciate your consideration.

Sincerely,
Debbie Farwell
San Luis Obispo resident

Attachment of NOP EIR as sent to Kim Murry on Jan. 9, 2014

Kim Murry, Deputy Director
Community Development Department
City of San Luis Obispo
General Plan Land Use and Circulation Elements Update
Scoping Meeting for NOP
Jan. 9, 2014

Kim,
I am submitting written comments, based on my oral presentation to the Planning Commission on Wednesday Jan. 8th. My concerns are directed toward the Upper Monterey Area LUCE Update and what appears to be a lack of knowledge about current conditions that we as neighbors, face day to day. I realize that at this point, the language for the NOP is standardized and non-specific, due to the large scope of the update. I will use the N.O.P. paperwork provided at the Dec. 7, 2013 Future Fair as a guideline for my comments. I'd appreciate it if you could please pass along my written comments to the Commission, as they consider the EIR for the LUCE Update. I appreciate your time and
consideration. I will e-mail my comments on the City Council myself, to save you some time.

On page 1, Notice of Completion & Environmental Document Transmittal, dated 12/2/13, the second section, Project Location. Please note "Waterways" with San Luis Obispo Creek and Chorro Creek listed. I’d like to point out that there is a small (depending upon drought) year-round creek, which crosses our property. I believe that the source for the creek is along the foothills of the Cal Poly Grand Ave entry, along Slack St. It travels toward Hwy 101, to cross Wilson St. and behind houses along Park. It crosses behind VFW Hall on Mill St. near the Vet’s Building. It crosses Palm St. and travels across resident property lines and can be found next to Frank’s Hot Dogs on Monterey St. and California. I believe it passes along Monterey St. down to join San Luis Creek at the concrete culverts near the Anderson Hotel. Street run-off and gutter drainage passes directly into this small local creek, finding its’ way eventually into the downtown creek system.

While “no zoning changes have been proposed”, the language of the Update reflects an intent to increase the density of hotels, restaurants and a possible conference center along the Upper Monterey Corridor. With increased density, there will be more hazardous materials discharged into our creek. Increased garbage storage, auto drainage on streets, air and dust pollution will be washed by surface water into the creek in our neighborhood, to join the larger San Luis Creek.

During my lifetime, I’ve lived closely to the creeks in my neighborhood. I’ve lived here on Palm St. for 39 years, next to our small creek. In 1971-1972 I lived over Muzio’s Grocery Store in Downtown San Luis. We spent a good deal of time listening to the frogs in the creek in front of the Mission. Since the 70’s there has been a significant decrease in the Summer frog chorus downtown and on our own property. Frogs have been considered the “canary in the coalmine”, by some environmental researchers. Please address supportive biological environments as required in the Biological Resources section of the EIR in relation to frogs and other impacted fauna.

My second point of concern about the LUCE for the Upper Monterey Street Area is noise. In addition to auto traffic, the music of restaurants,
impacts our environment. Frank’s Hot Dogs have 2 speakers facing the outside eating patio. The “canned music” is audible about \( \frac{1}{2} \) a block away on Monterey and California. Daily sound volume and wind are factors in how far the sound travels. Add to that, the traffic noise. An additional source of loud noise and dust, are the “professional” landscape maintenance, which blows clean the businesses along Monterey and California. An increasing number of businesses and landlords, use the “blow and go” type of landscaping. **Noise is a Potential Environmental Impact, which needs to be assessed, in the EIR for the LUCE Update.** Please address this very intrusive factor that we who live on the Monterey Street corridor live with daily.

My third concern is related to restaurant and business garbage within the Upper Monterey Street Area. Over the last 5 years, the numbers of raccoons, opossums and rats have been increasing. These critters get into the numerous garbage containers along Monterey Street and use the creek as a transportation system. With the blessing of US Fish and Wildlife, I trapped 5 raccoons myself, between November and December. The raccoons killed one opossum and I trapped another. I still have raccoons coming in at night. The rats are a constant. The garbage containers are left open, wet garbage leaks out through the container onto the pavement, which can wash into the gutter system. The critters are destructive, digging and destroying landscaping. In additional, they are a health hazard. **Please consider the impact that restaurant and business garbage has on the surrounding neighborhood, within the Hazardous Materials section of the EIR.**

Under the Aesthetics section of potential environmental impacts, light and glare is addressed. Currently the Lamplighter Hotel has security lights facing away from the hotel into the parking lot, due to vandalism and concerns of theft. They shine away from the hotel into the windows of the residence across the street. The neighbor has unsuccessfully approached the hotel in attempts to have the lights turned away from the house. Due to terrain, the Lamplighter Hotel towers about 4 stories above our homes, if one is standing on the corner, of Grove and Palm St. Security lights are rotated outwards, but the lights shine for quite a distance beyond the hotel. When we first
moved into our home, we could see the Milky Way. Now, we are lucky if we can see the brightest stars/planets. **Light pollution needs to be addressed in the EIR, with the current and any future density that is considered.** View shed has been greatly reduced during the last decade on our 2 blocks of Palm Street. We used to be able to see mountains to the East and to the West from our home. Now, we have lost all view to the West and partial view to the East. A two story house was built to the West. We were assured that there would be no impact. However, due to the foundation being raised for flood purposes, and over height ceilings, we lost our view from our sun porch. Positioned on a slope, the Lamplighter Motel renovation expends 4 stories. It has a huge impact on the neighborhood view shed. I am concerned about any remolds that extend upward, blocking both sunshine and view to our neighborhood. **Please consider the impact of buildings, which block the view or sunlight of pre-existing residences.** This hasn’t been taken into account in the past, leaving us with visual blights.

There is no mention of the environmental impact of odor into a residential neighborhood. This is a huge issue for those of us living along Palm Street. Starting around 6 AM, Franks’ starts breakfast with onions and bacon cooking. As the day progresses, the smells are of hamburger and sometimes rancid grease. Depending on the wind, it is possible to detect odors from the railroad tracks on Palm, to Grove Street at Monterey. I have a lovely garden, but when I walk outside, it isn’t my flowers I smell. It is onions, bacon and burgers from Franks’. All of my neighbors have complained as well. It is nauseating, to smell the odors every day. One can smell bread from Splash Cafe and Mexican food from Pepe Delgados walking along Monterey Street. By far, Franks’ odors travel the farthest and are the most constant. For the neighbors with 2-story homes, the odors seem to enter their higher windows easier. **While odor isn’t directly listed on the N.O.P. Potential Environmental Impacts to be Assessed, please discuss odors related to restaurant food prep and garbage storage.** Being able to enjoy our homes and gardens is directly effected by the smells in the air around us. Increasing hotel, restaurants and possible conference center density,
will make it worse, if the current problems aren’t mitigated.
I appreciate your consideration of these concerns.
Increased traffic will make the intersection at California and Monterey Street even less safe. It has limited visibility and some high-speed traffic. Bikes, skateboards, pedestrians, food delivery trucks and autos all share a very small space. In walking through our neighborhood, it appears that very little forethought was used in creating a residential and business community. This is a good opportunity to improve upon the mistakes that were made in the past. Thank you for allowing our input into the process.
Debbie Farwell
Palm Street
Response to Comment P11-1
This comment provides general opinions regarding a variety of environmental and social issues, and the LUCE Update process. Although the information provided by this comment does not directly pertain to the adequacy of the environmental impact analysis provided in the Draft EIR, the comment has been noted and will be provided to the Planning Commission and City Council for consideration in the decision-making process.

In addition, please note that the proposed LUCE Update would result in a variety of physical land use changes, including those identified for proposed land use development areas (Project Description Table 2.4-2) and proposed street network changes (Project Description Table 2.5-1). Potential environmental impacts of the proposed land use and street network changes were the focus of the environmental impact review provided by the Draft EIR. Please also refer to Master Response #2, Programmatic Nature of EIR.
July 28, 2014

Kim Murry, Community Development Department  
City of San Luis Obispo  
919 Palm Street  
San Luis Obispo, CA 93401

Dear Kim,

Thank you for allowing us to comment on the City of San Luis Obispo Land Use and Circulation Element Draft EIR. The inclusion of the Special Study Areas and Specific Plan Areas, including San Luis Ranch, should help inform the public on the environmental effects of the LUCE and the included component projects.

We have identified several portions of the document that could use additional information for clarity, more details on mitigation proposed measures, or other changes that will allow for more effective implementation.

We hope that the following comments will allow the City to respond in a meaningful way to improve this environmental document.

Volume I (Draft Program EIR)  
Page 2-37  
Circulation Element Street Network Changes: Please clarify that Froom Ranch Way connection to Dalidio/Prado Road is included in the Maximum Circulation Improvement Alternative as the environmentally superior alternative.

Page 4-84  
Although Perfumo Creek runs along the site’s border, San Luis Obispo Creek does not occur within the San Luis Ranch Specific Plan Area. Perfumo Creek and adjacent willow riparian vegetation is not “Coastal and Valley Freshwater Marsh” habitat. That designation refers to outdated nomenclature for vegetation classification (Holland 1986). Current vegetation classification is according to A Manual of California Vegetation, 2nd ed. (Sawyer, Keeler-Wolf, and Evens 2009).

3940-7 Broad Street, #139  
San Luis Obispo, CA 93401  
(805) 471-2948  
Rachel@KovesdiConsulting.com
Page 4-115
Please clarify that the San Luis Ranch Specific Plan Area is not located within an existing historic district. Individual structures within the San Luis Ranch Specific Plan Area will be evaluated for historic value and impacts will be appropriately mitigated.

Volume II (Land Use Element)
Page 43 – Section 2.2.7
We suggest adding language such as “protect in kind” or “create in kind habitat off site” to allow for some project mitigation flexibility, and to allow for wildlife habitat enhancement (e.g. replace non-native vegetation such as eucalyptus trees with multi-species native tree and shrub habitat beneficial to diverse wildlife species).

Page 43 – Section 2.2.9, G(b)
We recommend inserting the terms “healthy” and “native” to promote restoration projects that enhance resource values.

Volume III (Circulation Appendix)
Page 4-2, 4-16 and 17, 4-24 and 25, and 4-34 through 36
Please include a discussion of Caltrans (District 5) mobility goals and objectives and how they relate to the City of SLO, as well as a discussion of SLOCOG Mobility/Circulation Element and how the LUCE coordinates with those policies, goals and objectives.

Page 4-36
Please document the transition from road miles to DVMT. The HPMS data system does not cover the same road network as City maintained road miles.

Please include a summary discussion of US Highway 101, State Route 1 within the City Limits and how they function.

All available information relative to existing or projected traffic conditions should be added to the technical appendices and reports to avoid possible inconsistencies between the LUCE EIR and any subsequent project-specific EIRs.

A Technical Memorandum was issued on June 29th related to Sensitivity Analysis of the Roadway Improvements. That Technical Memorandum appears to supplement and/or replace Appendix N and that relationship needs to be clarified.

There appear to be possible inconsistencies between the traffic volumes contained in the body of the Draft EIR, the Technical Appendices, and the most recent Technical Memorandum that need to be addressed. These inconsistencies may be most directly addressed by the inclusion of street network maps with information on existing and projected ADT, PM and AM peak hour counts within the City’s entire Sphere of Influence.
There are multiple references to FDOT (Florida Department of Transportation). Should these reference and calculations be revised to reflect Caltrans or other local standards of calculations?

Page 4-101
Please include what criteria were used to select these 13 segments, and why Los Osos Valley Road – Madonna Road to Higuera Street was not included. Why does the Broad Street corridor end at Orcutt Road, instead of including segments to the City limit? The MMLOS analysis should connect corridors to depict a system of mobility corridors that traverse the City, not truncate where facilities end.

Page 4-141
NACTO should be utilized as a reference for the various mobility sectors (www.nacto.org). There is a wealth of information that is applicable to the LUCE.

Volume III (5.3 Storm Drainage)
Page 5-35
In several locations on this page, there is reference to the Waterway Management Plan (2003) with regard to the overtopping of Highway 101 north of Madonna Road. We were not able to find within the WMP the specific mention of only a 10-year flow capacity for San Luis Obispo Creek. The Drainage Design Manual does indicate in Figure WMP 3-1a that the capacity at this location is < 25 year storm event. Please clarify.

Again, thank you for allowing us the opportunity to comment on the Land Use and Circulation Element Draft EIR. Please do not hesitate to contact our office with any questions regarding these comments. We appreciate your thoughtful consideration of these comments and look forward to continuing the LUCE update process.

Very best regards,

Rachel K Kovesdi

Rachel Kovesdi
Kovesdi Consulting
Response to Comment P12-1  

As part of the LUCE Update, a comprehensive list of circulation improvements to be considered (called the “project description”) was reviewed and approved for further analysis by the City Council. This list also included variations of those improvements. For the “Calle Joaquin Connection to Dalidio Drive”, the project description included both the option for and without this connection.

The technical memorandum included as Appendix N in the Draft EIR provides the sensitivity analysis performed on those individual variations. The results of this sensitivity analysis were then used by the City to determine which variations would be included as part of the Proposed Project presented in the EIR.

The “Calle Joaquin Connection to Dalidio Drive” circulation improvement was considered during the City’s review of the LUCE Update and was evaluated as part of the sensitivity analysis (see Appendix N of the EIR). Ultimately, it was determined that this connection did not draw enough traffic to justify its inclusion when considering infrastructure cost and potential impacts to agricultural and open space.

The Maximum Circulation Improvement Alternative does include the “Calle Joaquin Connection to Dalidio Drive” option in the modeling prepared to support the impact analysis of the EIR alternatives. Additionally, the Maximum Circulation Improvement Alternative also includes the “Realign Vachel Lane” circulation improvement that was similarly included in the LUCE Update EIR analysis but was determined to be a low priority improvement as well. Table 2.5-1, items #16 and #17, have been edited to reflect this as follows:

16  Connections to Dalidio Dr. from Froom Ranch Way and/or Calle Joaquin

Option Removed from consideration due to low justification and potential impacts. (not part of proposed project or EIR alternatives)

17  Realign Vachel Ln.

Option removed from consideration due to low justification and potential impacts.

Removed from consideration (not part of proposed project or EIR alternatives)

Response to Comment P12-2

Although San Luis Obispo Creek does not border the San Luis Ranch site, portions of the site are influenced by the proximity to both San Luis Obispo and Prefumo Creeks and future development has the potential to result in impacts to nearby sensitive resources associated with both Creeks. With respect to the comment concerning the proper botanical resource designations, as discussed in the LUCE Update Background Report (Volume III), the classification of plant communities or natural habitats discussed in the EIR are generally described by the assemblages of plant species that occur together in the same area forming habitat types. The habitat types within the Planning Area have been generally categorized by the Robert Holland 1986 classification of terrestrial vegetation with further refinement of plant community alliances following, A Manual of California Vegetation, 2nd edition (Sawyer et al. 2009). The use of the Holland description of Coastal Valley Freshwater Marsh habitat corresponds to the California Natural Diversity Database (CNDDB) terminology used to identify special status habitats and is consistent with the terms used to identify Natural Communities of Special Concern by the California Department of Fish and Wildlife (please refer to Table 4.4-2 of the Draft EIR).

Response to Comment P12-3

The commenter requests that discussion regarding potential archaeological impacts for the San Luis Ranch Specific Plan area be corrected to indicate Cultural Heritage Committee review is required for “construction of new buildings in historic districts, and for properties that contain potentially historic structures” in order to clarify that the Specific Plan area is not located in an historic district. In regard to the analysis of historical resource impacts, the Draft EIR identifies several buildings on the San Luis Ranch Specific Plan site that have the potential to be historically significant, and indicates that potential impacts to those resources could be reduced to a less than significant level with the implementation of Land Use Element policies.
Response to Comment 12-4
This comment provides suggestions for the revision of or edits to the proposed LUCE Update as it relates to diction. Although the information provided by this comment does not pertain to the adequacy of the environmental impact analysis provided by the Draft EIR, the comment has been noted in Appendix of the Final EIR and will be provided to the Planning Commission and City Council for consideration in the decision making process.

Please also refer to Master Response #1, Comments Specific to the LUCE Update Concepts and/or Policies.

Response to Comment 12-5
This comment provides suggestions for the revision of or edits to the proposed LUCE Update as it relates to diction. Although the information provided by this comment does not pertain to the adequacy of the environmental impact analysis provided by the Draft EIR, the comment has been noted in Appendix of the Final EIR and will be provided to the Planning Commission and City Council for consideration in the decision making process.

Please also refer to Master Response #1, Comments Specific to the LUCE Update Concepts and/or Policies.

Response to Comment P12-6
This commenter provides suggestions for the revision of or edits to the proposed LUCE Update (which is included with the EIR as Appendix D) as it relates to the pedestrian, bicycle, transit and vehicular regulatory settings. Although the information provided by this comment does not pertain to the adequacy of the environmental impact analysis provided by the Draft EIR, the comment has been noted in Appendix of the Final EIR and will be provided to the Planning Commission and City Council for consideration in the decision making process.

Please also refer to Master Response #1, Comments Specific to the LUCE Update Concepts and/or Policies.

Response to Comment P12-7
The commenter requests better documentation of the steps taken to quantify daily vehicle miles traveled based on HMPS data. Baseline “ground truth” VMT information for City owned facilities is based on published information from the Caltrans HPMS program. Multiplying the total centerline miles of state highway within the City boundaries by the Average Daily Traffic volumes published by Caltrans yields the portion of VMT traveled on state owned facilities within City boundaries. Adding the local VMT and state system VMT yields total baseline VMT. Although the information provided by this comment does not pertain to the adequacy of the environmental impact analysis provided by the Draft EIR, the comment has been noted in Appendix of the Final EIR and will be provided to the Planning Commission and City Council for consideration in the decision making process.

Please also refer to Master Response #1, Comments Specific to the LUCE Update Concepts and/or Policies.

Response to Comment P12-8
The commenter provides suggestions for the revision of or edits to the proposed LUCE Update (which is included with the EIR as Appendix D) as it relates to the function of US 101 and State Route 1 within the city limit. The function and operation of US 101 and State Route 1 are discussed in the EIR in the following sub-sections: Transportation System Overview (page 4-317), Roadways (page 4-321) and Roadway Operations (page 4-328). Although the information provided by this comment does not pertain to the adequacy of the environmental impact analysis provided by the Draft EIR, the comment has been noted in Appendix of the Final EIR and will be provided to the Planning Commission and City Council for consideration in the decision making process.

Please also refer to Master Response #1, Comments Specific to the LUCE Update Concepts and/or Policies.

Response to Comment P12-9
The commenter suggests that all available information regarding existing or projected traffic conditions should be included in the technical appendices so that future project-specific EIRs may be consistent with the LUCE Update EIR. HCM Signalized and Unsignalized Intersection Capacity Analysis output sheets from Synchro have been included with the EIR as Appendices K and L. These output sheets provide traffic volumes for existing conditions and the proposed project conditions, respectively, and may be used to ensure consistency during preparation of future project-specific EIRs.
Response to Comment P12-10
As part of the LUCE Update, a comprehensive list of circulation improvements to be considered (called the “project description”) was reviewed and approved for further analysis by the City Council. This list also included variations of those improvements. The technical memorandum included as Appendix N in the Draft EIR provides the sensitivity analysis performed on those individual variations. The results of this sensitivity analysis were then used by the City to determine which variations would be included as part of the Proposed Project presented in the EIR. From this analysis, the City identified 17 circulation improvements to include in the Proposed Project.

In Comment P12-10, the commenter requests clarification regarding the significance of the technical memorandum issued on June 29, 2014 related to the circulation sensitivity analysis. The information included in the June 29, 2014 technical memorandum augments Appendix N, but it does not change the results of the analysis prepared in conjunction with the Draft EIR.

Response to Comment P12-11
The commenter states that traffic volumes documented in the body of the DEIR and the technical appendices have inconsistencies. The various discrepancies noted by the commenter pertain to interpreting the “raw” model volume output plots as final processed output appropriate for operational analysis, which is not the intended purpose of raw model volumes. Operational results are provided in tabular form only. To clarify, the following text will be added to the bottom of page N-2 of Appendix N:

The “raw” model volume plots merely provide a visual indication of the relative redistribution of traffic resulting from a given infrastructure change. Similarly, the model networks are intended to be schematic to illustrate future network connections and should not be construed as precise plan lines.

Response to Comment P12-12
The commenter questions whether the FDOT (Florida Department of Transportation) procedure to apply the Highway Capacity Manual (HCM) methodology can be accurately applied in California. The HCM methodology is the industry standard to evaluate capacity and level of service of the street network. The FDOT procedure is consistent with the HCM and is a methodology that has been utilized by numerous agencies outside of Florida.

Response to Comment P12-13
The commenter provides suggestions for the revision of or edits to the proposed LUCE Update as it relates to the identification of the multimodal system analysis. These roadways were analyzed for both the AM and PM peak hours for each direction of travel. Multimodal analysis of these roadways establishes baseline conditions and sets the stage for future examination and evaluation of these and other roadways. The purpose for selecting these roadways was to establish a cross-section of facility and area types, providing opportunities to compare and contrast performance on various facilities and in assorted areas. Future analysis of these and additional roadways will contribute to development of a multimodal network within the city. Although the information provided by this comment does not pertain to the adequacy of the environmental impact analysis provided by the Draft EIR, the comment has been noted in Appendix of the Final EIR and will be provided to the Planning Commission and City Council for consideration in the decision making process.

Please also refer to Master Response #1, Comments Specific to the LUCE Update Concepts and/or Policies.

Response to Comment P12-14
The commenter provides suggestions for the revision of or edits to the proposed LUCE Update as it relates to resources available for planning for alternative modes. Although the information provided by this comment does not pertain to the adequacy of the environmental impact analysis provided by the Draft EIR, the comment has been noted in Appendix of the Final EIR and will be provided to the Planning Commission and City Council for consideration in the decision making process. Outside of the LUCE update the City currently in the process of officially accepting NACTO guidelines as a reference document for its transportation facilities.
Response to Comment 12-15
The commenter comments on the location of flow capacity information within the Waterway Management Plan. Flow capacity for the San Luis Obispo Creek is referenced on Page 16 of the Waterway Management Plan and also within the Mid-Higuera Enhancement Plan.
July 28, 2014

Derek Johnson, Director
Community Development Department
City of San Luis Obispo, California 93401

RE: Comments on LUCE Draft EIR

Dear Derek,

Please accept my comments on the Draft Environmental Impact Report for the Draft Land Use and Circulation Element Update. I hope that many of them will be favorable and acted on. We need in particular an alternative to the draft plan which would balance residential and non-residential allocations, to reduce the amount of projected traffic on regional roads and highways, not to mention city streets.

Please be aware that my comments in the Aesthetics chapter about the interpretation of City policies and guidelines represent my viewpoint alone about past instances where these policies have been observed lightly or not at all. I know that City staff exercise great care in their work and are highly professional. They can only be encouraged to become more expert and thorough, as we all can. I do appreciate all of the fine work that has gone into a sustainable LUCE. However, you may be interested in my suggestion for bolstering these policies so that they are more discrete and mandatory in project review.

Regards,

s/ James Lopes
Project Description Chapter

1. Reference: Existing Land Use, Figure 2.3-4, Page 2-9: The map shows the areas located outside the existing land use plan as in “Open Space.”
   a. Comment: Some areas are clearly not in Open Space use: such as the Madonna Ranch along Foothill Boulevard, the Burke commercial service park on Highway 227-Edna Road. The map should be corrected and perhaps re-categorized. Does it show land use designations or land use types?

2. Reference: Future Development Capacity from Existing Specific Plans, Planned Projects, and Other Vacant Land. Table 2.3-3; Text page 2-13. This table shows the extent of possible, new development and capacity in the Planning Subarea “that may occur under existing conditions.” The text on page 2-13 uses a mid-range population projection from SLOCOG that would increase to 48,550 people by 2035 (10% increase). Employment is projected to increase to 9,400 jobs by 2035 (30% increase). The estimate for non-residential development is projected at 5,170,000 square feet by 2035 (1 estimate a 28% increase).
   a. Comment: The difference between population and employment growth is a tremendous disparity that will impact housing demand and cost, and impact Highway 101 and other roads’ capacities for safe, efficient travel.
   b. Comment: What is the source of the employment estimates and projections?
   c. Comment: A thorough analysis of these projected increases should include:
      i. A comparison to the past trends in population and employment growth.
      ii. A comparison to the thresholds of growth management actions.
   d. Comment: The potential for a worsened imbalance in local housing for the projected employment growth should be analyzed for its impacts on housing costs and on roadway capacities and operations, which can be incorporated in the Land Use and the Traffic and Circulation chapters.
      i. Using the current Housing Element update research, perhaps the amount of housing occupied by college students could be estimated.
      ii. The amount of housing available to employees could be estimated with the subtraction of student-occupied housing.
      iii. An estimate of the general number of employees in (non-student) occupied households could be made from Census data. Or a rule of thumb estimate could be used such as 1.5 employees per household.
      iv. This number of employees could be subtracted from the existing number of housed employees, which would indicate the number of commuting employees.
v. An estimate of the deficit of housing units could be made by dividing the commuting employees by the ratio of employees per household.

vi. The current housing deficit could be compared to the projected employment and housing demand in 2035, with an estimate of the deficit (imbalance) then.

   a. Comment: What is the basis of the limit of “one unit/20 acres or greater?” Aren’t these County designations? They are typically much higher density and should be reflected here.

4. Reference: Proposed Land Use Diagram, Figure 2.4-1, page 2-15: The plan map doesn’t show Open Space areas correctly, for instance Islay and Righetti Hills.

5. Reference: Non-residential growth, First paragraph, page 2-14: The third sentence states that the requirements for non-residential growth management (assumption) will not be applicable to “companies with a significant number of head of household jobs.”
   a. Comment: What is the income range and number of existing jobs in this description? The description does not match any Federal or State income or employment group. It should be categorized and described in the LUCE Growth Management section and here more clearly and accurately. Is a “head of household” job any job making more than $15.00 per hour, or something higher? Or is it a type of job that provides enough income for a family of four? How will future staff and Councils know what to make of this phrase?

6. Reference: 2.4.14 Land Use Element Buildout Assumptions, page 2-28, third paragraph:
   “As shown on Table 2.4-3, potential future development in the Land Use Element Planning Subarea as envisioned by the proposed Land Use Element Update could result in approximately 4,904 additional dwelling units, and an estimated 5,081,708 square feet of non-residential uses.”
   a. Comment: Where is there a discussion of Plan Buildout, compared to Projected 2035 Growth? Just stating data does not constitute analysis.
   b. Comment: Table 2.3-3 is also titled “Capacity,” which is confusing in that it lists areas with vacant land. Is the difference between these tables to be considered ‘Infill?’ That is, replacement of existing structures on under-developed lots? How likely is infill to happen?
   c. Comment: Table 2.3-4 lists Projected growth to 2035. Analysis needs to be made comparing this growth with the capacity listed in the other two tables. Question is raised why the projected non-residential development to 2035 is greater than the Plan Capacity in Table 2.4-3. The projection is for 5,170,000 square feet, while the capacity is for 5,081,708.
   d. Comment: Given the above comparison, should the City be calling the LUCE a sustainable plan when instead of providing long-term capacity, it plans for all of the non-residential areas to be developed in the next 20 years? What is the program impact of this on the City economy and on Highway 101 and other roadways?
   e. Comment: Can the LUCE and EIR explain that the total (?) capacity for housing is 4,904 units (Table 2.4-3), with 2,588 units estimated to be located on vacant parcels (Table 2.3-3?), and that by 2035, housing in
2,651 units is projected to be developed (Table 2.3-4), leaving a remaining capacity for 2,253 units after 2035? If this is what is underlying these tables, then the authors should make it clear, and similarly for non-residential development, in text or text and table.

f. Comment: What are the impacts of this development on the City Water Supplies and on roadway traffic capacities?

Environmental Setting

7. Reference: Cumulative Project Setting, third paragraph, page 3-2: “Cumulative buildout of the proposed LUCE Update includes buildout of areas within existing city boundaries, as well as buildout of the identified expansion areas within the City’s sphere of influence.”

a. Comment: I don’t find any of the LAFCO Sphere of Influence areas in Table 2.4-3. These areas would include the Madonna ranch on Foothill Road, and the 107 acre property on Orcutt Road. I don’t find these areas identified or discussed on the Figure maps either. Potential development was analyzed when they were considered by LAFCO, and that data and impact should be analyzed here. Or, has the SOI been reduced?

Aesthetics Chapter

8. Reference: Aesthetics; General Plan Policies; page 4-15: “The Architectural Review Commission (ARC) reviews and approves the design for proposed buildings... The ARC uses the City’s Community Design Guidelines (June 2010) as a basis for evaluating the suitability and appropriateness of individual project design to help achieve attractive and environmentally sensitive development.”

a. Comment: City practice is essential to the success of the General Plan policies, as well as the Community Design Guidelines. It is true that the ARC and staff refer to the Guidelines, but they often treat them lightly, and sometimes ignore them. They use the General Plan policies similarly, even on big projects. Staff reviewed the Garden Street Terraces and the Monterey Place projects without identifying, considering or enforcing several General Plan policies which were enumerated to the staff and ARC, as one example.

The EIR should mitigate this likely omission of these policies, by writing a new one. “The LUCE update shall include a Land Use Element policy, to the effect that the General Plan policies shall be used to their fullest extent and meaning when applicable to subdivision and development projects, as if they were zoning standards. These policies shall be interpreted as “shall’s” and not optional “should’s.” This umbrella policy would emphasize that the General Plan policies mean something more than good ideas.

To reinforce this approach, the EIR should recommend that the Zoning Ordinance be amended to require that General Plan policies be adopted as zoning standards and enforced as such, in order to have effective mitigating policies. Actually, more jurisdictions use the zoning ordinance as the place for standards, not the General Plan. At this point, these policies are off in the General Plan and not that apparent in project
reviews. Actually without this policy, their use will continue to be optional and render the conclusion in Impact AES-2 box to be debatable at best.

Agricultural Resources

9. **Reference**: *Regional Agricultural Production, second paragraph, page 4-31*: “Refer to Figure 4.2-1 for a detailed depiction of agricultural production within the city’s LUCE SOI Planning Subarea.”
   a. **Comment**: The Figure includes a much larger area than other ones. It illustrates micro-areas of agriculture inaccurately, such as the San Luis Ranch property is shown as Oat Field/Rotational Crops; it should be only Rotational Crops. It does not show the extensive, universal use of Rangeland in the Irish Hills, the Madonna ranch on Foothill, and elsewhere. Some explanation should be provided as to how and why these classifications were made, or corrected.

10. **Reference**: *Prime Farmland and Soils, page 4-33*: “The existing General Plan includes solutions to the continued irretrievable loss of farmland resources, primarily through open space preservation, community separators, and greenbelt policies.”
    a. **Comment**: This paragraph does not identify areas of prime farmland or discuss them accurately. Instead the author directs attention to “more than 7,500 acres” that have been protected. But, that acreage is mostly non-prime grazing land. This is a section on “prime farmland” and additional and more extensive efforts are needed to protect prime farmland. Please identify the acreage of land within the City and Urban Reserve which is in prime soil farmland.

The City General Plan policies on the San Luis Ranch property are examples of what the City is *not* doing to save prime farmland. The City Plan was amended in 1994 to “give” development potential to more than half of the property. This was not a staunch defense of prime farmland. This type of “protection” should be analyzed for its environmental impact on the remaining prime farmland. **The reduction in farmland acreage constitutes a threat to the remaining area due to smaller properties and viable commercial sizes.** Due to an uneducated political will for more growth on the Froom Ranch, the San Luis Ranch, the Airport Area, the City is reducing and threatening the sustainable potential of a local vegetable food supply for the very long term. The EIR needs to take the LUCE plan project in its entirety, no matter the age of its policies, to address the potential loss of prime farmland and devise effective mitigations or alternatives.

The loss of this farmland, *any of it*, is a significant, avoidable impact. The mitigation would be to address preservation more ambitiously and pointedly in the applicable General Plan policies. Or, a LUCE project alternative should be written/shown that re-designates these areas as Agriculture, with long term policies and strategies for fee acquisition, lot retirement, very small development trade-off areas located off-site on non-prime soils, and tax measures such as ag preserves.

11. **Reference**: *1.7.3 Commercial Uses in Greenbelt, page 4-40*: “The City shall not allow commercial development within the greenbelt area unless it is clearly incidental to and supportive of agriculture or other open space uses.”
a. Comment: Would it be possible to include a map of the "greenbelt" area? Or a reference to a document that identifies this area? Or is it a concept without an map?

Land Use Chapter

   a. Comment: Could a section be written that identifies the LAFCO Sphere of Influence (SOI) in area and policies directed toward the properties within it? These properties were included with conceptual planning which had environmental review. They constitute the City’s official plan for future expansion of the Urban Reserve, but they have not been mentioned or included to this point. For instance, what is the development potential of the Madonna Foothill Road ranch in the SOI? They should be specifically included in this LUCE update and EIR.

   a. Comment: Due to the conflicts in policy between the Airport Land Use Plan and the City LUE, there are significant environmental effects in noise and safety. However, these are not avoidable. The EIR can and should identify an alternative to the LUCE policies which achieves the densities in the ALUP, thereby preserving the land for a safe crash site, and it also incidentally saves the prime farmland soil for continued farming. The alternative would allow for some commercial development apparently which would benefit the owner. Similar responses to the LUCE policies could be included in this alternative for the Madonna LOVR property and the Avila Ranch.

   a. Comment: Other areas within the Sphere of Influence need to be addressed in this section.

15. Reference: L. Housing Diversity, page 4-428: “Housing Diversity. A mix of housing types, and a range of density within a neighborhood is generally desirable (see also Policy 2.1.6).”  
   a. Comment: This policy could lead to plan and zoning changes that increase density in existing built neighborhoods, such as for duplexes or triplexes on larger lots, or an overall increase in the allowed density – units per acre – in a future Land Use Element amendment. The EIR should identify a likely scenario of more diverse neighborhood development and then consider and evaluate the potential impacts of the proposed language on existing neighborhood character and conflicts with other City LUCE policies.

Noise Chapter

16. Reference: Environmental Setting, second paragraph, page 4-258. “Based on railroad noise modeling conducted, noise levels from the railroad would result in 69 dBA CNEL at 50 feet from the center of the track.”  
   a. Comment: Actual noise measurements should be used in this case, since the modeling resulted in an inaccurate number. Sweet Bay Lane would be an ideal place to measure locomotive noise, particularly because the exhaust noise is probably as loud as a jet engine – much louder than 80 decibels. The lesson is that development near the
railroad should respond to a policy that physically screens it from the exhaust of locomotives, as well as the lower engine and wheels.

Population and Housing Chapter

17. Reference: Buildout of the LUCE housing allowance:
   a. Comment: The potential development of the Sphere of Influence properties should be included in the LUCE and the EIR analysis. These properties are defined by the SOI as future annexation areas within the next 20 years.

18. Reference: Impact PH-2: The LUCE Update would not result in a substantial displacement of residents or existing housing units. This impact is considered Class III, less than significant. Page 4-287.
   a. Comment: The EIR needs to consider and evaluate the additional unplanned densities within existing neighborhoods, as a result of the encouragement of mixed residential densities in the “Housing Diversity” Policy 2.1.6, mentioned above. The policy opens the door to ordinance changes that would allow more dwelling units per lot and per acre than are currently allowed within existing neighborhoods. The potential for a significant increase in the residential units estimated for the LUCE is a threat to the coherence of neighborhoods and their livability.

Transportation and Circulation Chapter

   a. Comment: The list of fair-share improvements does not include buses, or parts of buses as allocated by in-lieu fees for parts of parking garages. This mitigation should include the contribution toward needed buses, which are very expensive.

20. Reference: Impact CIR-2, page 4-344: “...in downtown San Luis Obispo, intersections operating at LOS E or better will deteriorate to LOS F...”
   a. Comment: What are the sources of this local impact on downtown? Much more needs to be explained and analyzed about this level of traffic impact.

21. Reference: Impact CIR-3, page 3-346: Development under the LUCE Update will increase traffic on freeway facilities. Impact is considered to be Class I, significant and unavoidable.
   a. Comment: Past actions of the City and County have generated huge increases in employee commuting on Highway 101 and now 227 and County roads. The City continues to aim to be the regional center for retail shopping and for high-tech offices. The EIR should identify the share of Highway 101 travel generated or attracted by the city, which has trended over the last 30 years and forward to 2035.
   b. Comment: The LUCE allocates land for over 5,000,000 square feet of additional non-residential floor area (28% increase by 2035). Additional employment would be approximately 9,090 employees at the staff estimate of 550 square feet per employee.

   The LUCE only allocates land for an additional 2,651 residential units (10% increase by 2035). At an admittedly generic 1.5 employees per household, these units would house only 3,977 employees by 2035. However, students currently occupy 60% of the housing stock, which
could continue at a high percentage related to expansion of Cal Poly and Cuesta College. Assuming that housing is 60% occupied by students in 2035, then only 1,060 new units will be available to house 1,590 employees.

This imbalance between the planned growth of commerce versus housing will mean an additional 7,500 employees will not find housing in San Luis Obispo and will be commuting, with continued student housing conditions. Although this brief analysis is somewhat generic, it illustrates what is needed to identify the impact to the regional transportation system caused by the LUCE update. Not only Highway 101, but Highway 227, Price Canyon Road, Noyes Road, Corbett Canyon Road and others will be severely impacted by this imbalance in LUCE land use allocations.

The mitigation strategy for the LUCE imbalance would be to manage the rate of non-residential growth every year to equal the rate of residential unit growth.

The second strategy would be to plan and require that non-residential development, which is so far out of balance already, be allocated only to small-scale business development until the deficit in housing is largely erased. That is, no more big-box or large regional shopping centers, or large-scale “head of household” job centers, would be allowed until the housing deficit is close or at zero with employee housing needs.

c. Comment: The alternatives section should also include a balanced plan alternative which allocates non-residential land to employ only the 1,590 people which could be housed, theoretically, by the residential allocation. This is the number of employees that the LUCE housing allocation will likely accommodate by 2035. The non-residential allocation would be for 550 square feet per employee or 874,500 square feet of non-residential building area. This floor area actually sounds quite reasonable given the preferred very low rate of residential development in the city. It is about 200,000 square feet more than the building square footage in the Downtown. The limited non-residential alternative actually would reduce impacts on city streets and intersections as well. This alternative could be increased by adding more residential units to the plan such as at Avila Ranch, which is only planned for detached single family homes.

d. Comment: The identified impact in the City travel model does not include the most recent projections from the SLOCOG regional travel model. The EIR should account for this difference, devise an integration of these models, or just use the SLOCOG travel model.

Alternatives Chapter

22. Reference: 6-1, page 6-2: Alternatives Removed from Consideration – Reduced Non-Residential Capacity alternative

a. Comment: Quite a ‘straw dog’ argument has been used to delete the “Reduced Non-Residential Capacity” alternative. It is speculative that a significant number of new residents would commute to other “more distant services and job locations.” Other cities and the county will as likely house many San Luis Obispo commuters, because they find home prices more affordable in those communities. As stated above, a
balanced plan alternative would ADD perhaps 874,000 square feet of non-residential development. This would not amount to a "substantial reduction in non-residential uses."

The author of the EIR should focus on the current and historic trend in commuter traffic to San Luis Obispo as non-residential development has occurred. A projection of this trend will identify the potential numbers of employee commuters that future non-residential development will generate, to 2035 and buildout.

This alternative is essential to demonstrating to SLOCOG and other cities and the county that San Luis Obispo is seriously considering taking its responsibility in a sustainable transportation system.

End of Comments
Response to Comment P13-1

Draft EIR Figure 2.3-4 is considered adequate for generally depicting land use conditions (not land use designations) that exist throughout the LUCE Planning Subarea. It should be recognized that given the scale of the map and the constraints associated with depicting all types of land uses, the ability to depict the land use at an individual property may be somewhat limited. It should also be recognized that the type of land use at a given location is subject to change over time.

Response to Comment P13-2

a. This comment relates to the City’s jobs/housing balance as part of the proposed LUCE Update. Although the information provided by this comment does not pertain to the adequacy of the environmental impact analysis provided in the Draft EIR, the comment has been noted and will be provided to the Planning Commission and City Council for consideration in the decision making process.

Please also refer to Master Response #3, Jobs/Housing Balance. For more information on circulation impacts of the proposed project, please see Volume V of the Draft Program EIR.

b. The Commenter questioned the source of employment estimates and projections. As noted at the end of Table 2.3-3 on Page 2-12 of the Draft Program EIR, employment estimates and projections have been tabulated with information from the Community Development Department Project Status Report, Information from the City of San Luis Obispo, and calculations by members of the City Consultant Team (Mintier Harnish and Applied Development Economics)

c. The Commenter desired a thorough analysis of population increases to include a comparison to the past trends in population and employment growth and a comparison to the threshold growth management actions. Section 2.1 and 2.3 of the Background Report has been included as part of the Draft Program EIR. These sections, titled Demographics and Economic Development include information on population trends and employment growth. Land Use Element Policy 1.10.2 restricts residential growth to no more than one percent per year. As stated on Page 4-286 of the Draft Program EIR, the potential number of dwelling units that could be located in the city after buildout of the proposed Land Use Element (25,601) would not exceed the one percent per year maximum number of dwelling units specified by Policy 1.10.2 (25,762).

d. This comment relates to the City’s jobs/housing balance as part of the proposed LUCE Update. Although the information provided by this comment does not pertain to the adequacy of the environmental impact analysis provided in the Draft EIR, the comment has been noted and will be provided to the Planning Commission and City Council for consideration in the decision making process.

Please also refer to Master Response #3, Jobs/Housing Balance.

Response to Comment P13-3

The Commenter stated that Unincorporated Rural Residential and Residential Suburban Land Uses should be a higher density. All Rural Residential and Residential Suburban land uses are located in unincorporated county areas and are subject to land use decisions by the County. These areas area also within the City’s Greenbelt which is why preference for less density and larger parcel sizes is expressed in the City’s land use designations.

Response to Comment P13-4

The Commenter stated that Open Space areas are not shown correctly on Figure 2.4-1. There is no change proposed Open Space areas per the LUCE update. Islay and Righetti Hill are both labeled as Open Space on Figure 2.4-1 of the Draft Program EIR.
Response to Comment P13-5

The Commenter states that “Head of Household” Jobs need to be better defined to direct future staff and Council. Head of Household Jobs are defined in the City of San Luis Obispo Economic Development Strategic Plan as follows:

- Income Level - the position’s salary enables the employee to support dependents with some level of disposable income,
- Employer Sponsored Benefits - the employee receives some level of healthcare benefits,
- Stability - the position is permanent and provides a stable income source,
- Career Ladder - there are opportunities for promotions and/or skill expansion, and
- Education Level and Technical Skill - the position requires a certain level of education or skill.

In regards to the comment what defines a “significant” number of head of household jobs, such a finding would be made on a case-by-case basis by the City Council. Also see Master Response #1, Comments Specific to the LUCE Update Concepts and/or Policies.

Response to Comment P13-6A

This comment suggests that the Draft EIR include a discussion of Plan Buildout compared to Projected 2035 growth. The City will revise the Draft EIR to include a new table and discussion for this comparison.

Changes to text:

The SLOCOG Regional Growth Forecast projects a demand for 4,271 people, 2,429 housing units, and 9,400 jobs between 2010 and 2035. Assuming 550 non-residential square feet per job, there is a demand for 5,170,000 square feet of non-residential floor area between 2010 and 2035. Potential future development in the Land Use Element Planning Subarea as envisioned by the proposed Land Use Element Update could result in approximately 4,904 additional dwelling units, 11,229 people, 11,346 jobs, and 5,081,708 non-residential square feet. The total future development capacity under the proposed Land Use Element exceeds the projected demand in population, housing units, and employment. It can accommodate over 98 percent of projected demand for non-residential square footage.

Table 2.4-5 Comparison of SLOCOG Projections and Total Future Development Capacity, 2010-2035

<table>
<thead>
<tr>
<th></th>
<th>SLOCOG Regional Growth Forecast</th>
<th>Total Future Development Capacity</th>
</tr>
</thead>
<tbody>
<tr>
<td>Population</td>
<td>4,271</td>
<td>11,229</td>
</tr>
<tr>
<td>Housing Units</td>
<td>2,429</td>
<td>4,904</td>
</tr>
<tr>
<td>Employment</td>
<td>9,400</td>
<td>11,346</td>
</tr>
<tr>
<td>Non-Residential Square</td>
<td>5,170,000</td>
<td>5,081,708</td>
</tr>
</tbody>
</table>

*See Table 2.3-4.

*SLOCOG forecast population is based on 1.75 persons/household. Future development population is based on 2010 Census 2.2 persons/household

Response to Comment P13-6B

This comment relates to the difference between Table 2.3-3 and Table 2.4-3. Table 2.3-3 describes capacity under the existing Land Use Element. Table 2.4-3 describes capacity under the proposed Land Use Element. The major difference between capacity in the two tables is the inclusion of revised development potential numbers based on the preferred alternatives for the various focus areas selected by the City Council for the LUCE update. Both tables assume redevelopment of some underutilized property as well as development of vacant sites.
Response to Comment P13-6C
The SLOCOG projections included in Table 2.3-4 are projections meant to give an estimate of future “demand” for housing and employment. The non-residential square footage in this table is based on an assumption of 550 square feet per employee. These projections should be considered rough estimates of future growth and development as a general guide for planning for future land use within a 20-year planning horizon. Within this timeframe the plan will likely be updated and amended multiple times to account for changing needs and conditions. The capacity described in Table 2.4-3 exceeds the SLOCOG projections for housing units, population, and employment. The non-residential square footage capacity is over 98 percent of the projected non-residential demand shown in Table 2.3-4. This comment suggests that the Draft EIR include a discussion of Plan Buildout compared to Projected 2035 growth. The City has revised the Draft EIR to include a new table and discussion for this comparison (see Response to Comment P13-6A).

Response to Comment P13-6D
This comment expresses concern that the LUCE plans for all of the non-residential areas to be developed in the next 20 years. The LUCE does not “call” for all non-residential areas to be developed. Non-residential capacity described in Table 2.4-3 shows what could be developed within previously approved Specific Plans, approved projects, and potential development sites identified through the LUCE alternatives process. See response to comment P13-6C above. The environmental impacts of the LUCE on Highway 101 and other roadways is addressed in Section 4.15, Traffic and Circulation.

Response to Comment P13-6E
This comment suggests that the Draft EIR include a discussion comparing projected growth with development capacity under the updated Land Use Element. The City has revised the Draft EIR to include a new table and discussion for this comparison (see Response to Comment P13-6A). For a clarification of the difference between Table 2.3-3 and Table 2.4-3, see the response to comment P13-6B.

Response to Comment P13-6F
This comment asks what the impacts of development would be on the City water supplies and on roadway traffic capacities. The environmental impacts of the LUCE on City water supplies are addressed in Section 4.16, Utilities and Service Systems. The environmental impacts of the LUCE on roadway traffic capacities is addressed in Section 4.15, Traffic and Circulation.

Response to Comment P13-7
The Commenter questioned the exclusion of some LAFCO Sphere of Influence growth areas. “Identified Expansion Areas” of the LUCE Update are those areas that were identified by the City Council for future development, with a focus primarily on infill. LAFCO designated Sphere of Influence Areas were not automatically included.

Response to Comment P13-8
This comment provides an opinion regarding the future implementation of various City policies and guidelines. The EIR does not include the analysis of internal City functionality. Although the information provided by this comment does not pertain to the adequacy of the environmental impact analysis provided in the Draft EIR, the comment has been noted and will be provided to the Planning Commission and City Council for consideration in the decision-making process.

Response to Comment P13-9
Draft EIR Figure 4.2-1 provides a generalized map depicting existing types of agriculture on parcels located throughout the LUCE Planning Subarea. The Planning Subarea is the boundary of the EIR study area and is depicted on other maps included in the Draft EIR. Figure 4.2-1 is considered adequate for the purpose of generally depicting the types of agricultural operations that exist throughout the LUCE Planning Subarea. It should be recognized that given the scale of the map and the constraints associated with depicting all types of agricultural operations, the ability to depict a specific type of agriculture at an individual property is somewhat limited. It should also be recognized that the type of agriculture conducted at a given location is subject to change over time.
Response to Comment P13-10
This comment indicates that the EIR does not identify areas of prime farmland. Please refer to Draft EIR Figure 4.2-2, which depicts the locations of prime agricultural soils in the LUCE Planning Subarea. This comment also provides general opinions regarding previous conversions of agricultural soil in the City and the effects of the proposed LUCE Update related to the conversion of prime agricultural soils to non-agricultural uses. Please note that the Draft EIR identified 14 goals, policies and programs of the proposed LUCE Update and the City’s Conservation and Open Space Element of the General Plan that provide requirements and various mechanisms to minimize impacts related to the conversion of prime agricultural soils to non-agricultural uses. The Draft EIR concluded that with the implementation of the existing and proposed goals, policies and programs, project-related conversions of prime agricultural soils would be reduced to a less than significant level. Although the information provided by this comment does not pertain directly to the adequacy of the environmental impact analysis provided in the Draft EIR, the comment has been noted and will be provided to the Planning Commission and City Council for consideration in the decision-making process.

Response to Comment P13-11
Page 4-42 of the Draft EIR identifies various existing City policies related to the conservation of agricultural soils. On that page the following policy of the City’s Conservation and Open Space Element is referenced:

8.2.1 Open space preserved.
The City will preserve as open space or agriculture the undeveloped and agricultural land outside the urban reserve line, including the designated Greenbelt as shown in Figure 5 [of the Conservation and Open Space Element], and will encourage individuals, organizations and other agencies to do likewise.

As indicated by the referenced policy, a map of the City’s Greenbelt is provided by Conservation and Open Space Element Figure 5. Please refer to the Conservation and Open Space Element for more information.

Response to Comment P13-12
Please refer to Response to Comment P13-7.

Response to Comment P13-13
This comment provides an opinion that conflicts between the ALUP and the LUCE update present significant environmental effects of noise and safety related to airport operations. Pages 4-258-259 and 4-277-279 of the Draft EIR address aircraft-related noise and concludes no significant effects will occur. Pages 4-177 and 4-187 through 4-192 of the Draft EIR discusses potential hazards related to airport operations and concludes no significant impacts associated with the LUCE update. The evaluation and discussion in the Draft EIR is supported by substantial analysis in Appendix F, Johnson Aviation Report, of the Draft EIR which reviewed safety, noise, overflight, obstruction, and land use constraints associated with the San Luis Obispo County Regional Airport based on the State Aeronautics Act, California Airport Land Use Planning Handbook produced by Caltrans Division of Aeronautics, and FAA regulations.

Response to Comment P13-14
The “Proposed Annexation” subsection on Draft EIR page 4-246 addresses proposed policies that pertain to the consideration of annexing Cal Poly and the Airport area into the city. As proposed, the implementation of those policies would only result in a revision of the city limits and would not result in any new development or other physical changes to existing environmental conditions. Other development areas identified by the LUCE Update, such as the San Luis Ranch and Madonna on LOVR Specific Plan areas, would require annexation to the city; as proposed would result in new development that would change existing environmental conditions; and would have the potential to result in significant environmental impacts. The potential environmental impacts of annexing and the subsequent development of those specific plan areas have been evaluated throughout Section 4.0 of the Draft EIR.

Response to Comment P13-15
The analysis of potential environmental impacts provided by the Draft EIR is based, in part, on the residential unit types and densities depicted on Draft EIR Table 2.3-3. The footnotes to Table 2.3-3 describe assumptions used to develop the projected unit types and numbers used in the EIR analysis. Providing additional analysis based on speculative assumptions regarding potential changes to the assumed residential unit types and numbers is not required by CEQA.
Should subsequent development projects propose more units on a particular site than was anticipated by the Draft LUCE Update EIR, subsequent evaluation of the impacts of those additional units would be required consistent with the requirements of CEQA and City Policy 12.3.11 Environmental Review.

Please also refer to Master Response #2, Programmatic Nature of the Draft EIR and Master Response #1, Comments Specific to the LUCE Update Concepts and/or Policies.

Response to Comment P13-16

The comment suggests that because the railroad noise modeling prepared for the project resulted in inaccurate noise levels that noise monitoring should be conducted. The comment does not provide any substantiated details (e.g., monitoring conducted in accordance with ANSI standards or referenced documents). The modeled railroad noise levels presented in 4.11-9 were modeled based on Noise Impact Assessment Guidelines for assessing railroad and transit noise (FTA 2006), which is a widely accepted practice in the industry. This comment provides a general opinion. Although the information provided by this comment does not pertain to the adequacy of the environmental impact analysis provided in the Draft EIR, the comment has been noted and will be provided to the Planning Commission and City Council for consideration in the decision making process.

Response to Comment P13-17

Not all properties within the City’s Sphere of Influence have land use designations that would allow substantial future development, nor does the LUCE Update propose land use changes for all properties within the City’s Sphere of Influence that would facilitate future development. The Draft LUCE Update EIR has evaluated potential environmental impacts that may result from proposed changes in land use type/future development within the LUCE Update Planning Subarea. Please note that the LUCE Planning Subarea boundary is not the same as the City’s Sphere of Influence as approved by LAFCO.

Response to Comment P13-18

Please refer to response P13-15 above.

Response to Comment P13-19

The commenter states that provision of additional buses could be a potential improvement for transit as mitigation for a significant impact. Subsection C of Policy 6.0.E has modified to incorporate this suggestion.

**Transit**: For transit-related impacts, developments shall be responsible for their fair share of any infrastructural improvements required. This may involve provision of street furniture at transit stops, transit shelters, and/or transit shelter amenities, pullouts for transit vehicles, transit signal prioritization, provision of additional transit vehicles, or exclusive transit lanes.

Response to Comment P13-20

The commenter states that the sources of increased traffic volumes in downtown, which result in congested conditions, should be analyzed and discussed. The City’s travel demand model was used to forecast traffic volumes for 2035 Proposed Project conditions. Please see the Analysis Approach and Methodology section on page 4-334 of the DEIR for discussion of the development of the travel demand model. The model forecasts show increases in traffic volumes in downtown to levels that generate congestion at some downtown intersections. A select-zone model run was not conducted to identify origins and destinations of trips in downtown under 2035 Proposed Project conditions, as this is beyond the scope of a programmatic EIR. Discussion of intersection analysis and the resultant impacts can be found in the discussion following Impact CIR-2 of the DEIR (pages 4-344 through 4-346). Table 4.15-9 in the DEIR (page 4-340) displays the impacted intersections under 2035 Proposed Project conditions.
Response to Comment P13-21
The commenter cites jobs/housing imbalance as the key contributor to identified impacts on US 101 and suggests an additional land use alternative to be evaluated as part of the LUCE Update EIR. Although the information provided by this comment does not pertain to the adequacy of the environmental impact analysis provided in the Draft EIR, the comment has been noted and will be provided to the Planning Commission and City Council for consideration in the decision making process.

Please also refer to Response to Comment A7-11 regarding impacts to US 101 and Master Response #3, Jobs/Housing Balance.

Response to Comment P13-22
This comment provides suggestions for the revision of or edits to the proposed LUCE Update as it relates to the “Reduced Non-Residential Capacity alternative. Although the information provided by this comment does not pertain to the adequacy of the environmental impact analysis provided by the Draft EIR, the comment has been noted in Appendix of the Final EIR and will be provided to the Planning Commission and City Council for consideration in the decision making process.

Please also refer to Master Response #1, Comments Specific to the LUCE Update Concepts and/or Policies.
To: Kim Murry, Deputy Director

Community Development Department

City of San Luis Obispo

919 Palm Street

San Luis Obispo, CA 93401

Dear Ms. Murry,

I fully support the memo of the SLO 2035/2050 Group, "Revision of the SLO Land Use & Circulation Element 2035/2050" of September 5, 2013. Please incorporate as much as you can in the above three documents. Also, I have these two suggestions:

1) I would like to see downtown San Luis Obispo become a bicycle / pedestrian only area. I realize that this can’t happen overnight and that the city will act slowly and evaluate each step. I propose that the first step would be to close Higuera every day at 6 PM like for farmer’s market. Then we can experiment by moving the closing time up to noon, and then to 9 AM to provide time for businesses to transition to getting orders in the early morning. If this turns out to be appreciated, then more areas can be closed to traffic for greater periods of time, or maybe we find that closing Higuera alone is sufficient.

2) Please provide a 4-way stop sign on Pacific at Moro. I find it ironic that people with children on bikes (including my wife) refuse to use the bicycle boulevard because crossing Pacific is too risky. We are a bicycling family and wish for our lives here to be safer.

We appreciate the opportunity to live in SLO, and also to be heard by the city government. Thank you.

Pete, Neil and Tekuru Schwartz and Robin Oswald at 1441 Iris St.

Pete Schwartz
Cal Poly Physics
the new science building, 180-608
Renewable Energy
Appropriate Technology
805-756-1220
pschwart@calpoly.edu
Response to Comment P14-1
This comment provides general support for the proposed LUCE Update project. The comment has been noted and will be provided to the Planning Commission and City Council for consideration in the decision-making process.

Response to Comment P14-2
The City concurs that alternative forms of transportation should be emphasized. For example, Proposed Circulation Element Chapter 4.0 provides a variety of policies and programs intended to enhance bicycle use and circulation throughout the City. This comment will be provided to the Planning Commission and City Council for consideration in the decision-making process.

Response to Comment P14-3
This comment provides suggestions related to providing an all-way stop sign on Pacific at Morro. This is an operational concern outside the scope of a programmatic EIR. City staff will evaluate this request and respond directly to Mr. Schwartz separate from the LUCE process. Although the information provided by this comment does not pertain to the adequacy of the environmental impact analysis provided by the Draft EIR, the comment has been noted and will be provided to the Planning Commission and City Council for consideration in the decision-making process.
Kim Murry, Deputy Director  
Community Development Department  
City of San Luis Obispo  
919 Palm Street  
San Luis Obispo, CA 93401

July 25, 2014

RE: DRAFT SAN LUIS OBISPO 2035 LAND USE AND CIRCULATION UPDATE

Dear Ms. Murry:

I am a current long time resident of San Luis Obispo, a homeowner in the south Johnson Ave. area of San Luis Obispo, and also the President and Chairman of the Santa Maria Valley Railroad. The following are comments as a resident of San Luis Obispo (City) and on the behalf of the Board of the Santa Maria Valley Railroad (SMVRR). Also the SMVRR is a handling carrier for the Union Pacific Railroad, and these comments are forwarded to the Union Pacific Railroad (UPRR).

Reading through the San Luis Obispo 2035 Land Use and Circulation Update Draft Program EIR (LUCE), very little is mentioned about railroads, especially freight railroads, even though rail transportation is a positive contributor in decreasing traffic congestion, decreasing GHG, and increasing the competitiveness of local industries by delivering a cost effective and efficient transportation system.

First here are comments on specific elements of the LUCE draft:

SLO 2035 LAND USE AND CIRCULATION UPDATE VOLUME 1

4.7 Environmental Impact Analysis Global Climate Change
4.1.6 Railroad Bikeway and Trail Page 4-165

The City should obtain railroad right-of-way and easements to establish a separated bike path and pedestrian trail through San Luis Obispo.

Bike paths and pedestrian trails adjacent to railroad right-of-ways are not compatible. Trespassing on railroad right-of-way is unsafe and poses as security problems for railroads. Generally speaking fencing along bike paths is inadequate. An example is The Railroad Safety Trail, much of the fencing is breached and trespassing is rampant. Public bike paths and pedestrian trails pose a large liability issue for both the railroad company and the municipality. Complaints about noise and graffiti by the public increase along adjacent bike paths and
pedestrian trails. Also a bike path adjacent to a railroad right-of-way cuts off the possibility of adjacent properties that could be served by rail.

4.7 Environmental Impact Analysis Global Climate Change

**16.0.2 Encourage Alternative Transportation** Page 4-169

**General Plan Policy or Program**

Freight mobility is not addressed, specifically freight rail transportation. Even if freight rail transportation is not practical for San Luis Obispo based industries due to limited service and facilities in the City, shipping by rail over a major distance and transloaded to truck to a facility like Betteravia Industrial Park on the SMVRR, reducing GHG and traffic congestion over a larger geographic area. While this scenario may not have much impact locally, GHG and traffic congestion is alleviated across a much larger area.

4.8 Hazards and Hazardous Materials

**Hazardous Materials Transportation** Page 4-174

Railroads are regulated by the Federal Railroad Administration and California Public Utilities Commission. In addition, the railroad industry is self-regulating as the Association of American Railroads and the Association of Short Line and Regional Railroads are proactive in recommending new procedures and regulations. UPRR’s policies and procedures generally are more stringent than state and federal regulations, thereby increasing the margin of safety for handling hazardous materials.

4.11 Noise

**Railroad Traffic Noise** Page 4-268

*Train traffic in the city would not be anticipated to substantially increase as a result of the LUCE update; therefore, modeled existing train noise levels, for purposes of this analysis, are considered representative of future 2035 General Plan buildout conditions.*

Regardless, railroad traffic will most likely increase significantly to 2035. Railroads are the most efficient and cost effective form of bulk transportation and there is no technology on the horizon that will replace or compete with rail freight transportation. Even in the short term, with the Phillips 66 crude oil project on the horizon and the projected increase in rail traffic on the SMVRR as well as increased congestion on the UPRR’s corridor through the Central Valley, the projected increase in Amtrak trains, freight traffic on the UPRR Coast Line will increase significantly the next several years. Traffic on the SMVRR has quadrupled the last 4 years, resulting in an increase in noise complaints in the City of Santa Maria. The City of San Luis Obispo will have an increase in noise complaints from nearby residents as freight traffic increases.

APPENDIX B: DRAFT CIRCULATION ELEMENT

Chapter 2 - Circulation

4 Bicycle Transportation

**4.1.6 Programs Railway Bikeway and Trail** Page 17

Again, bike paths and pedestrian trails adjacent to railroad right-of-ways are not compatible. Trespassing on railroad right-of-way is unsafe and poses as security problems for railroads. Generally speaking fencing along bike paths is inadequate. An example is The Railroad Safety Trail, much of the fencing is breached and trespassing is rampant. Public bike paths and
pedestrian trails pose a large liability issue for both the railroad company and the municipality. Complaints about noise and graffiti by the public increase along adjacent bike paths and pedestrian trails. Also a bike path adjacent to a railroad right-of-way cuts off the possibility of adjacent properties that could be served by rail.

Chapter 2 - Circulation
12 Rail Transportation
Policies and Programs Page 46

In this section there is no mention of rail freight transportation which can significantly reduce congestion on the highways and reduce GHG while lowering customers’ freight costs enabling local industries to remain competitive in this global market. The Santa Maria Valley Railroad hauled about 5,000 truckloads of goods in the Santa Maria Valley last year.

Long term as population increases not only in San Luis Obispo but throughout the Central Coast traffic congestion will continue to worsen. Rail freight transportation can alleviate long term traffic congestion.

It is the policy of LOSSAN, SLOCOG, SBCAG, City of San Luis Obispo, and other cities and agencies to increase passenger rail service. Congestion on the north and south ends of the UP Coast Line needs to be addressed first. The SMVRR has experienced service failures the past three years as a direct result of passenger train congestion.

Chapter 2 - Circulation
12 Rail Transportation
12.1.3 Idling Train Engines Page 46
This may have been an issue during the last days of the Southern Pacific Railroad. As financial difficulties worsened, SP was hard pressed to maintain their equipment at acceptable levels and due to lack of capital investments, ran worn out locomotives that were not maintained. As a result, idling locomotives emitted high amounts of particulates and GHG gases. Union Pacific Railroad’s locomotive fleet is a modern fleet, well maintained, and operates the latest technology. In the near future UPRR’s locomotive fleet will be Tier 4 compliant. Going forward large railroads such as UPRR will continue to either replace or retrofit locomotives to meet the highest tiers that technology will allow. This is no longer relevant.

LUCE UPDATE BACKGROUND REPORT

4.2 Bicycle
Existing Conditions
Railroad Safety Trail (Class 1 Bikeway) Page 4-19
Again, bike paths and pedestrian trails adjacent to railroad right-of-ways are not compatible. Trespassing on railroad right-of-way is unsafe and poses as security problems for railroads. Generally speaking fencing along bike paths is inadequate. An example is The Railroad Safety Trail, much of the fencing is breached and trespassing is rampant. Public bike paths and pedestrian trails pose a large liability issue for both the railroad company and the municipality. Complaints about noise and graffiti by the public increase along adjacent bike paths and
pedestrian trails. Also a bike path adjacent to a railroad right-of-way cuts off the possibility of adjacent properties that could be served by rail.

4.8 Railroad

**Regulatory Setting** Pages 4-155 to 4-157

California State Freight Mobility Plan is currently up for review, should be included in the Regulatory Setting section.

**APPENDIX N, SENSITIVITY ANALYSIS**


This potential project should be placed as a higher priority as we expect rail traffic to increase significantly. Also eliminating at grade crossings increases the safety of the public and railroad personnel. There are funds and grants available for eliminating at grade crossings.

**SANTA MARIA VALLEY RAILROAD**

Large railroads such as Union Pacific Railroad are most efficient in hauling long trains from one origination to one destination. The large railroads are less efficient in serving smaller customers such as single carload customers. The Santa Maria Valley Railroad interchanges trains from UPRR and switches individual cars to customers. The SMVRR can serve single car customers efficiently on our line. Also the SMVRR serves trans load customers at the Betteravia Industrial Park. Customers who are not directly located on a rail line can offload from rail cars to trucks for the final destination. Customers can enjoy the cost benefits and efficiency of rail transportation but still have the convenience of truck transportation.

The Santa Maria Valley Railroad is a 14 mile short line railroad serving the Santa Maria Valley and interchanges with the Union Pacific Railroad at Guadalupe, California. The SMVRR transports railcars for business and industries located along the right-of-way. The SMVRR serves customers not located on its line by providing trans load services on team tracks, designated tracks for customers to trans load product from rail cars to trucks or trucks to rail cars. Freight products include frozen vegetables, frozen strawberries, fertilizer, lumber, building material, steel, aluminum, plastic pellets, LPG, fuel oil, tractors, and wine. The SMVRR is a full service railroad. Along with railroad operations, the SMVRR repairs and builds track, services rail cars, maintains locomotives, and assists with planning of locating rail served industries.

The new ownership and management of the Santa Maria Valley Railroad has invigorated the railroad, delivering exceptional service to its freight customers. As a result, 2012 was one of the best years in 20 years as the Santa Maria Valley Railroad hauled an equivalent of 5,000 truckloads of freight for the year, alleviating traffic congestion in the Santa Maria Valley while decreasing the carbon footprint of its customers and lowering the cost of freight transportation to its customers.

Economically Santa Maria Valley Railroad customers saved approximately $15.6 million in transportation costs. Captive shippers, companies who would have to relocate to another rail served community if rail service was discontinued, have a direct economic impact of $34.9
million to $57.5 million on the Santa Maria Valley. Loss of rail service in the Santa Maria Valley will mean a loss of over 900 jobs in the Santa Maria Valley as a result of captive shippers relocating out of the Santa Maria Valley.

The Santa Maria Valley Railroad is a major economic resource for the Santa Maria Valley and surrounding areas. A short line railroad, railroads typically less than 100 miles long and serve as either the origination point or final destination points for rail freight service, is a huge economic advantage for a local community or region. Local companies can enjoy the economic and environmental advantages of freight railroad transportation, enabling local companies to compete globally.

One freight car can haul about 4 truckloads of freight on the average. With Central Coast customers already taking advantage of a hub and spoke distribution or trans loading from the SMVRR, our operations have a direct impact on all of the Central Coast including San Luis Obispo. We depend on the efficient operations of the Union Pacific Railroad to deliver high quality and timely service to our customers. The general policies of the City of San Luis Obispo appear to directly conflict with the safe and efficient operations of the Union Pacific Railroad.

SAN LUIS OBISPO RAIL YARD AND TRANSLOAD FACILITY FEASIBILITY STUDY

Union Pacific Railroad is the largest railroad in North America. UPRR’s efficiency lies in hauling unit trains from origin to destination. This precludes the efficient handling of single carload business which can exist in San Luis Obispo. The Santa Maria Valley Railroad is currently conducting a feasibility study for rebuilding the Union Pacific Railroad yard located west of the Union Pacific Railroad main line from the former Southern Pacific Railroad freight depot to Orcutt Road in San Luis Obispo.

The transload facility will be relocated and expanded south of the old roundhouse near Francis Street. A separate siding west of the UP main line with spur tracks coming off of the siding to serve the expanded transload area and also serve a private car track to host private passenger cars. Another spur will serve the San Luis Obispo Railroad Museum for the movement of historical yet AAR compliant equipment off of the UP main line. The SMVRR will control the operating rights for the rail yard and west siding. UP and Amtrak could drop or pick up cars in the siding and the SMVRR will perform all yard switching duties. The yard will be rebuilt integrating the operations of the San Luis Obispo Railroad Museum. The museum’s long term goals of rebuilding the roundhouse and turntable and building a spur towards Orcutt Road for excursions and motorcar runs.

Elements of the 1998 Railroad District Plan are preserved including the rebuilding of the roundhouse and preservation of the historical elements. This project is predicated on an agreement with Union Pacific Railroad to either lease or sell the property and the SMVRR obtaining contract switching rights for the yard.
STANCE ON BICYCLE PATH POLICIES

One last comment concerning our adamant opposition for bike paths and walkways next to right-of-ways, we are not opposed to bike paths. We in fact encourage a strong bicycle circulation plan for the City. Three of our current principals owned a bicycle shop in downtown San Luis Obispo in the late 1980’s and sponsored a bicycle racing team, G.S. San Luis Cycling Team. We actively sponsor the Lompoc Criterium the last two years and this year is forming a cycling team. Bicycles, like railroads, are a great form of alternative transportation.

We hope that railroad elements are considered in the final LUCE plan.

Sincerely,

[Signature]

Rob Himoto
President

CC: Gregory Wallen, Manager of Road Operations, Union Pacific Railroad
    Liisa Stark, Director of Public Affairs, Union Pacific Railroad
    Lori Trout, Manager Short Line Development, Union Pacific Railroad
    Paul Marcinko, Regional Manager – NID, Union Pacific Railroad
    Melissa Grosz, Asset Manager - Industrial Products, Union Pacific Railroad
    Aileen Loe, Deputy District Director, Caltrans District 5
Response to Comment P15-1
The City concurs that safety, security and access issues must be evaluated when considering to use railroad right-of-way or developing parallel facilities for bicycle and/or pedestrian paths. An assessment of potential railroad right-of-way compatibility impacts would be conducted as part of the project-specific environmental review required for future development consistent with the requirements of CEQA and City Policy 12.3.11 Environmental Review. This comment will be provided to the Planning Commission and City Council for consideration during the LUCE Update decision-making process. In addition, please refer to comment response A1-1, which address railroad safety-related comments provided by the California Public Utilities Commission.

Response to Comment P15-2
The commenter states that additional language could be added to Draft General Plan Circulation Element Policy 16.0.2 to address freight rail transportation. This comment provides suggestions for the revision of or edits to the proposed LUCE Update as it relates to the merits of the General Plan Update. Although the information provided by this comment does not pertain to the adequacy of the environmental impact analysis provided by the Draft EIR, the comment has been noted in Appendix of the Final EIR and will be provided to the Planning Commission and City Council for consideration in the decision making process.

Please also refer to Master Response #1, Comments Specific to the LUCE Update Concepts and/or Policies.

Response to Comment P15-3
This comment provides information pertaining to regulatory oversight associated with the transportation of hazardous materials by railroads. The information provided by this comment does not pertain to the adequacy of the environmental impact analysis provided by the Draft EIR, however, the comment has been noted in Appendix of the Final EIR and will be provided to the Planning Commission and City Council for consideration in the decision-making process.

Response to Comment P15-4
The comment suggests that railroad traffic will most likely significantly increase by 2035 resulting in an increase in noise complaints from nearby residents. Based on the data available at the time of the analysis was conducted, there was no indication of this and future year projections for rail lines in the City were not available. The comment also does not provide any substantiated or referred data that future year modeling could rely on or any proof railroad traffic would increase.

Response to Comment P15-5
The commenter states that provision of bicycle and/or pedestrian paths along railroad right-of-way, as discussed in Draft General Plan Circulation Element Program 16.1.6, is not compatible with railroad activity. As mentioned in the letter from the City to the California Public Utilities Commission (CPUC) dated August 7, 2014, the City coordinated with both the CPUC and Union Pacific Railroad (UPRR) throughout the project and ultimately received authorization from UPRR for opening these improvements. This comment provides suggestions for the revision of or edits to the proposed LUCE Update as it relates to the merits of the General Plan Update. Although the information provided by this comment does not pertain to the adequacy of the environmental impact analysis provided by the Draft EIR, the comment has been noted in Appendix of the Final EIR and will be provided to the Planning Commission and City Council for consideration in the decision making process.

Please also refer to Master Response #1, Comments Specific to the LUCE Update Concepts and/or Policies.
Response to Comment P15-6
The commenter states that Section 12 of the Draft General Plan Circulation Element Update (Rail Transportation) does not discussion of freight transportation. This comment provides suggestions for the revision of or edits to the proposed LUCE Update as it relates to the merits of the General Plan Update. Although the information provided by this comment does not pertain to the adequacy of the environmental impact analysis provided by the Draft EIR, the comment has been noted in Appendix of the Final EIR and will be provided to the Planning Commission and City Council for consideration in the decision making process.

Please also refer to Master Response #1, Comments Specific to the LUCE Update Concepts and/or Policies.

Response to Comment P15-7
The commenter states that Program 12.1.3 of the Draft General Plan Circulation Element Update (Idling Train Engines) is no longer relevant because the Union Pacific Railroad locomotive fleet is modern and well-maintained. This comment provides suggestions for the revision of or edits to the proposed LUCE Update as it relates to the merits of the General Plan Update. Although the information provided by this comment does not pertain to the adequacy of the environmental impact analysis provided by the Draft EIR, the comment has been noted in Appendix of the Final EIR and will be provided to the Planning Commission and City Council for consideration in the decision making process.

Please also refer to Master Response #1, Comments Specific to the LUCE Update Concepts and/or Policies.

Response to Comment P15-8
This comment provides suggestions for the revision of or edits to the proposed LUCE Update as it relates to bike and pedestrian trails adjacent to railroad infrastructure. As mentioned in the letter from the City to the California Public Utilities Commission (CPUC) dated August 7, 2014, the City coordinated with both the CPUC and Union Pacific Railroad (UPRR) throughout the project and ultimately received authorization from UPRR for opening these improvements. Although the information provided by this comment does not pertain to the adequacy of the environmental impact analysis provided by the Draft EIR, the comment has been noted in Appendix of the Final EIR and will be provided to the Planning Commission and City Council for consideration in the decision making process.

Please also refer to Master Response #1, Comments Specific to the LUCE Update Concepts and/or Policies.

Response to Comment P15-9
The Commenter desired the inclusion of the California State Freight Mobility Plan in Section 4.8 of the Background Report. The Background Report references final documents in the Regulatory Setting. As the California State Freight Mobility Plan is currently under review, the plan is considered speculative in character.

Response to Comment P15-10
The commenter states that grant funds may be available to help with implementation of the Orcutt Road Overpass Railroad Crossing shown on page N-25 of the DEIR. This comment provides general support for the proposed LUCE Update project as it relates to implementation of future infrastructure projects. The comment has been noted and will be provided to the Planning Commission and City Council for consideration in the decision making process.

Please refer to Response to Comment A6-21 for further discussion of funding opportunities for a transportation network improvement at this location.

Response to Comment P15-11
This comment provides general information regarding the Santa Maria Valley Railroad. Although the information provided by this comment does not pertain to the adequacy of the environmental impact analysis provided in the Draft EIR, the comment has been noted and will be provided to the Planning Commission and City Council for consideration in the decision-making process.
Response to Comment P15-12
The commenter states concern regarding the provision of bicycle paths within railroad right-of-way. As mentioned in the letter from the City to the California Public Utilities Commission (CPUC) dated August 7, 2014, the City coordinated with both the CPUC and Union Pacific Railroad (UPRR) throughout the project to install a bicycle path within existing railroad right-of-way in the city, and ultimately the City received authorization from UPRR for opening these improvements. Although the information provided by this comment does not pertain to the adequacy of the environmental impact analysis provided by the Draft EIR, the comment has been noted in Appendix of the Final EIR and will be provided to the Planning Commission and City Council for consideration in the decision making process.

Please also refer to Response to Comment P15-1.
Date: July 28, 2014
To: City Council - City of San Luis Obispo (SLO)  
SLO City Community Development Department
LUCE Committee Members
From: Mila Vujovich-La Barre (26 PAGES TOTAL)
Re: Comments for Draft Environmental Impact Report (DEIR) - LUCE 2035

By way of introduction, my name is Mila Vujovich-La Barre. As a community member and smart growth advocate, I have followed the development plans of San Luis Obispo for many years and take great interest in the Draft Environmental Impact Report (DEIR) for the Land Use Circulation Element (LUCE) document. These comments are to be submitted for evaluation and response.

Some of my concerns and observations were brought forth during the actual LUCE meetings where I appeared in the gallery, at the LUCE public forums and submitted in writing for the LUCE Notice of Preparation. An extensive letter that addressed some of my concerns can be found in Appendix E, Notice of Preparation (NOP) and Responses Page E-55. The problem remains that in this LUCE Draft EIR when one goes to find the responses for my concerns they cannot be found. For example, on my “Comment 1” found on Pages E-55 through E-57 of the document in regard to Prado Road, the “response category” states to refer to Section 4.15 of the Traffic and Circulation subheading. Neither I, nor two employees at the City of San Luis Obispo Planning Division front office could find that section in the document last week. That being said, if some of my comments appear to be redundant it is due to this lack of clarity in the LUCE Draft EIR and previous concerns in the Notice of Preparation (NOP) that were not adequately answered.

The other concern is the makeup of the committee deemed as the LUCE Committee. While I have an immense amount of respect for many of the individuals on the committee, many of them by trade were either in development, real estate agents, architects or politicians. Although the LUCE Chair, Eric Meyer did a fabulous job of making the public feel welcome at the meetings and at the public forums, what remains is a document that has a “world view” that in some cases is different from other citizens who care about the future of San Luis Obispo.

Also, it was also brought to my attention that a letter expressing a “dissenting opinion” was forwarded to the powers that be from some members of the LUCE committee about a few of the aspects in the LUCE document. I could not find that letter in the appendices and I feel that it should be included.

While it was a daunting task to craft a vision for San Luis Obispo for 2035, below are items for consideration and comment.

**Global Warming and the Current Drought**
In planning for the San Luis Obispo 20 years from now, there were few statistics that involve projections for the state of our environment in the event that global
warming and our current epic drought continue. It seems that there should be a clause somewhere that discusses these factors. The ramifications of global warming should, for example, change the way that we as citizens transport ourselves and our possessions. As a case in point, the traffic analysis focused primarily on the level of service (LOS) for cars and analyzed vehicular trips. It did not fully address nor propose a vision for extensive use of land and circulation that promotes pedestrians, bikes, electric bikes or the implementation and utilization of light rail.

Also one must wonder, if this drought continues, will future, approved development be put “on hold”? I could not find any mention of this predicament in this LUCE document.

The document also did not fully embrace the construction of Class 1 bike paths throughout our city or even consider a forward thinking concept like a bike path that connects the city in an East-West fashion that complements the North-South Bob Jones Bike path in our city. Recently, scholar and traffic engineer Eugene Jud shared with me a conceptual design that is included here. (Attachment A)

**Prado Road**

“Prado Road” is in the LUCE document multiple times and it has been on the general plan of San Luis Obispo since 1960. Many people do not realize that this is a “development driven road.” This road is by design to be used for future residential and commercial development in the San Luis Ranch (AKA Dalidio) area, the Margarita Area, the Damon and Garcia family planned homes and the Orcutt area. These 2,000 or so homes will all come with vehicular traffic. The commercial development slated for these areas will exceed 1.5 million square feet by my rough calculation. There will be vehicular traffic from those structures as well.

There are sections in this document where Prado Road is referred to as two-lane road and others where it is referred to as a four-lane truck highway. Please clarify this vision. Is Prado Road two lanes or four lanes? Is it a truck highway as listed in the LUCE document? Or not? (Attachment B)

As a citizen, I have asked for a comprehensive EIR of Prado Road from Broad Street to Madonna Road so that the cumulative effects can be recognized and mitigated. These requests have been made orally and in writing. I have made these requests at San Luis Obispo City Council meetings, at Planning Commission meetings and at LUCE meetings.

If Prado Road is allowed to be built in segments without this type of analysis, there will ultimately be a traffic nightmare for residents, tourists and business people that depend on this road.

I feel that this type of planning contradicts CEQA law that states:

“In Citizens Association the court held that “chopping up” a large project into many little ones, each with a minimal impact on the environment, with the use of negative declarations, did not comply with CEQA, as it would result in overlooking the cumulative environmental consequences, which could be disastrous. *Citizens*
Association, 172 Cal. App.3d at 151. (Source: Curtin's California Land Use and Planning Law)

As one case in point, a small portion of Prado Road was indeed constructed this last year near Higuera Street. It leads into the new Mangano homes development. Prado Road is one-lane in either direction with a round about and bike lanes. Is that going to be the style for the rest of the road? Again, will Prado Road be 2-lanes through this residential area or a four-lane truck route? Will it have roundabouts as originally planned or not?

At one of the recent SLO City Planning Commission meetings, there was discussion of this dilemma. One of the property owners near this proposed road commented that over 20% of the road is still privately owned by a citizen that does not have plans for development.

It is time to recognize and fully analyze what this road is, where it will go, who will pay for it and what the environmental impacts will be. For me it seems that this road is being segmented in this 2035 LUCE document. This is not the best planning.

Another portion of this road also remains of great concern to me and others that is the area of Prado Road known as the Northern Alignment. There has never been an EIR completed for the Northern Alignment. This fact was verified by past SLO City employee Wendy George in a letter to me over a decade ago. (Attachment C).

Again, in the document one can note that there has never been an EIR for The Northern Alignment of Prado Road. Why? This was due to the fact that this small portion of road was exempt from an EIR due to Section 13525 of CEQA. In the original City resolution authorizing the purchase of 23.5 acres it was exempt from CEQA because the land was purchased to be used for sports fields and open space. (Attachment D) It is only in the purchase agreement that mention is made that out of the 23.5 acres of land, 7 acres will be reserved for a future road. In that remains the dilemma. The Damon and Garcia families want to build a few hundred homes and need access to Broad Street in some way, shape or form to cope with the traffic that their development will create.

Unfortunately the area of concern – the Northern Alignment- was decided over a decade ago at a late night City Council meeting on a 3-2 vote. The swing vote was Allen Settle who had previously promised pro-soccer advocates that he would not vote for the Northern Alignment. Although that vote occurred a long time ago, this alignment is not set in stone. A comprehensive EIR of Prado Road will help to dictate the best direction for this small portion of road. My vision for this portion of the 23.5 acres is included here. (Attachment F)

Thankfully the upcoming Chevron remediation will remove the hills known as the “flower mounds” down to a 3% grade. That could give this extension of Prado Road direct access to the already signalized Industrial Way.
The other option for Prado Road may be to extend it south to Santa Fe and a widened Tank Farm Road.

It continues to appear extremely unsafe to have a four-lane truck highway 38 feet from where children and adults are playing sports. In addition, the original concept of a pedestrian tunnel under the proposed highway from the sports fields to the new homes also seems ill-conceived.

Maybe a comprehensive EIR of Prado Road or a Specific EIR of the Northern Alignment will indicate that the best solution is to change the location of the sports fields?

Prado Road has been the proverbial “elephant in the room” for years. The LUCE 2035 document should finally address this issue.

**Cultural Preservation**
In the area of the aforementioned proposed Northern Alignment of Prado Road, there is a cultural site that should be preserved. It is documented as CA-SLO-1427 (Attachment E).

This 5,000 year old Native American site is in outstanding condition and is in between the base of the South Hills Open Space and the Damon-Garcia Sports Fields. Approximately 50% of this site will be completely destroyed if the Northern extension of Prado Road is constructed.

If a Class-1 bike path is constructed where the Northern Alignment is proposed, this classic archaeological site can be preserved in its entirety. A Class-1 bike path in that location would also fulfill the fact that this land was originally purchased for recreation and open space.

**Prado Road Interchange at 101**
In the LUCE document, it states that Prado Road at Highway 101 may be an overpass or an interchange. It seems that it should be determined now whether or not an interchange would be allowed at this location by Caltrans.

A comprehensive EIR of Prado Road from Madonna to Broad Street would help to determine the numbers of vehicles, bikes and pedestrians that could be supported by an interchange versus an overpass. It would also help the new property owners of San Luis Ranch (AKA Dalldio) to determine the price point of any new development since they would ultimately be financially responsible for a significant portion of the interchange or overpass.

This analysis would also help to determine the orientation and design of the future homeless shelter and the RTA site at 40 Prado Road. It seems that a fully functional interchange at that site will compromise the design and functionality of both endeavors. Again, a comprehensive EIR of Prado Road would help to provide mitigations and direction for everyone now.
Schools
Another omission is in the area labeled “schools.” The future housing developments will all generate the need for roads, but it will also generate the need for schools and of course emergency services.

In the area labeled schools, I saw numbers of children generated from the new homes but I did not see the area called Margarita Area highlighted. Perhaps that was an oversight on my part as I reviewed both the hard copy draft at the Community Development counter and the LUCE DEIR on the CD.

The Margarita Area in town will have about 1,200 affordable homes and could generate about 1,000 children. That will have a significant impact and could generate the need for a new SLCUSD school. It should be included in this analysis.

Pacific Beach High School Site
This SLCUSD site is slated for commercial development. The City and SLCUSD may want to reevaluate that site as either a mixed use development or affordable housing since it is adjacent to the neighborhood near Target. This use will be more consistent with neighborhood character.

A Class 1 bike path could easily extend from that Pacific Beach High School area to both the Laguna Lake area and along the north side of Target and the car dealerships. Again, if the LUCE 2035 document is truly planning for the next generation, planning for alternative modes of transportation must be included in new development.

The Chevron Property
Since the Chevron development is technically in the County, it is understood why it was not included for consideration. However, in my NOP comments this earlier question was inadequately responded to.

In addition, just recently a large round a bout to handle traffic at Santa Fe and Tank Farm Road was approved as part of the Chevron remediation by the SLO City Planning Commission. Please explain how Santa Fe and Tank Farm will work fluidly less than ¼ of a mile from the Broad Street and Tank Farm intersection. It seems to me that if Tank Farm and Broad are signalized that it will jam up traffic in the round a bout. In addition, on some city plans I have seen another road proposed that basically comes after Santa Fe and before Broad Street in the east bound direction.

Please explain how this configuration will handle traffic appropriately. Then after vehicular traffic is addressed, please explain how bike and pedestrian traffic will be addressed at these same intersections. I am also concerned about how emergency services will negotiate this approved round a bout.

The most current plans for the Chevron property will also cause the Margarita Area Specific Plan to be reevaluated. Roads that were originally planned for the Chevron area to give people road access to and from the new Margarita Area are no longer being proposed in the Chevron remediation due to either contamination or other
problems in the remediation plan. A new Specific EIR for the Margarita Area should be initiated now based on these observations.

As mentioned before the “flower mounds” will be taken down to a 3% grade so that the stone from the mounds can be used to facilitate the remediation. That will be a proverbial “game changer” for circulation possibilities and should be addressed. It gives one direct access to the already signalized Industrial Road.

The other part of the Chevron Property that is important to consider is whether or not Tank Farm Road will be constructed as a 4-lane highway with Class 1 bike paths prior to the extensive remediation that will take several months. It seems that that should be done immediately for the safety, sanity and general well-being of residents who depend on Tank Farm Road for daily transit.

The other part of the Chevron proposal that will have a significant impact on development is the 900,000 square foot commercial development that is proposed to increase revenue for Chevron so that they can allegedly pay for the remediation. From my observation and analysis this construction is extremely excessive. The building should be less than half of the proposed size.

Also on the Chevron property there is a plan for Cal Ripkin sports fields. These sports fields should be placed adjacent to the current Damon and Garcia Sports fields to create a “Central Park like feel” for residents in the area and to facilitate life for children, adults and families who recreate. Currently these fields are placed on Tank Farm Road in the flight path of the airplanes, far away from the Damon-Garcia Sports Fields.

**The San Luis Ranch (The Dalidio Property)**
San Luis Ranch, formerly known as the Dalidio property, is soon to be under new ownership. I am very alarmed that in the LUCE document, the old Dalidio development is included but not any of the visions that constituents have for the property. City resident Jamie Lopes discussed and I believe at one time submitted to the LUCE team one new plan that I find admirable. It keeps the commercial and housing development adjacent to the current development across from Embassy Suites and Staples in an “L shape.” Lopes’ proposal preserves approximately 70 percent of the prime agricultural land for growing food.

While a few years back I would have completely endorsed the plan that Jamie Lopes submitted, I would now hope that if we are truly planning for the year 2035 that this Class 1 agricultural land would be preserved in its entirety. I challenge the new owner and his design team to maximize the existing footprint where there are now residences and support structures for what used to be working farm along Madonna Road.

The agricultural land could be utilized as a working farm by the new owners, Cal Poly or the adjacent SLO City Farm. If the LUCE plan is truly for the year 2035, as a city we need to plan accordingly - not just for retail shopping and housing but for food and water.
Currently, many people rely on online shopping or large urban centers and big box stores to do their shopping. It is doubtful that San Luis Obispo will need a retail area beyond what is already offered in our downtown core and in the outlying areas.

In 2035, people will need food, water and fresh air. This San Luis Ranch (Dalidio) land also sits on top of our emergency water supply and a portion of it is in the flood zone.

In short, other proposals for this land should be included in the LUCE document, not just the one that Dalidio’s development team proposed a few years back.

Construction on the San Luis Ranch area will be affected by the airport safety zone. Much of the area that is proposed for high density development appears to be affected by the airport safety zone.

Very specifically, I would like to see a rewording of Volume II App. A Draft Land Use Element under the topic of Dalidio on page 104, as well as a rewording in ES 1.6 on page ES-15. There on the topic of “Agricultural Resources. “ I disagree that construction on San Luis Ranch (AKA Dalidio) agricultural land will have “less than significant impacts.”

In the LUCE document, it states:
1.7.1 Open Space Protection. Within the City’s planning area and outside the urban reserve line, undeveloped land should be kept open. Prime agricultural land, productive agricultural land, and potentially productive agricultural land should be protected for farming. Scenic lands, sensitive wildlife habitat, and undeveloped prime agricultural land should be permanently protected as open space.

I consider the San Luis Ranch (AKA Dalidio) land to be prime and productive agricultural land. It should be protected for as much agricultural production as possible.

The Homeless Service Center on 40 Prado Road
Along with other constituents, I applaud the creation of a new, functional homeless service center. Originally, I was in favor of the center at the location on Higuera Street so that the construction of the homeless service center would not be compromised by the construction of Prado Road, slated to be a four-lane truck highway. I remain concerned that the ingress and egress to this homeless center will be difficult if Prado Road is an interchange instead of an overpass. The noise, truck and car fumes will require mitigation. The clients of the center will need a safe way to walk and bike there in the event they do not have vehicles.

The Development on Foothill at North Chorro
At more than one LUCE meeting, there was discussion of the construction of a pedestrian and bike bridge to allow Cal Poly students and other residents easy access from any new development at Foothill Plaza area to the opposite side of Santa Rosa/ Highway 1. I did not see this in the Circulation Plan and hope that one is still being considered.
**Aesthetics and Public Art/Entry Ways to City Core**

Although I was unable to locate mention of this category in the LUCE DEIR, it is important to preserve the beauty of our city. As I have commented in the past, as new construction for roads and buildings are considered and designed, I would like to see public art incorporated as much as possible.

For example on the revamped Los Osos Valley Road interchange, the concrete can be crafted, tiles can be inserted or iron work can be utilized to highlight the rich history of the tourist attractions in our area.

In addition, our city lacks appropriate entry ways and signage into our city core on Highway 101 and on Highway 1. As new construction and roads are planned through the LUCE document, please consider including these improvements.

**Cal Poly – New Construction/ Improved Communication**

Since Cal Poly is a separate entity form the City of San Luis Obispo, I understand future development for Cal Poly was not included in this review. However given the recent controversial, proposed dorm construction at Slack Street and Grand Avenue, one can see that a future with improved communication and planning together would be optimal for new roads, transportation options and housing.

In closing, I thank the hard-working LUCE team for their efforts and hope that my input will help San Luis Obispo be the best that it can be for the next generation. Please feel free to contact me in the even that you have any questions or desire additional input.

Respectfully,

*Mike Vujovich-La Barre*

Mike Vujovich-La Barre
650 Skyline Drive
San Luis Obispo, California 93405
Cell: 805.441.5818
E-mail: milavu@hotmail.com

Note: Attachments A-F
Attachment A
Be modern and fit!

Regional Route
Arterial
Collector
Local Street

Best Alternative: Concept
Santa Fe and Prado Road form a 'collector ring road' from Buckley Road to South Higuera Street. Prado Road is close to residences. It is purposely shown as 'winding' because its speed should be lower than on Tank Farm Road.
Attachment B
Attachment C
Mila Vujovich LaBarre  
650 Skyline Drive  
San Luis Obispo, California 93405

Wendy George, Assistant CAO-City of San Luis Obispo  
City Hall  
Palm at Osos Street  
San Luis Obispo, California 93401

Dear Ms. George,  

As you know I am very concerned about preserving the integrity of the 23.5 acres purchased for the Damon-Garcia sports fields. I was recently forwarded a copy of the e-mail that you sent to Elise Wheeler dated 8/7/03. Could you please respond to the following questions at your earliest convenience?

A) Re: Paragraph 1  
When Ken Hampian replied that the archaeological site was studied as part of the current project:  
1) What document did he say was used to study the archaeological site?  
2) What “current project” was Ken referring to? Was it the Damon-Garcia sports fields or the Prado Road project?

B) Re: Paragraph 2  
It states that the archaeological study was the source document for the Environmental Impact Report done for the sports field project.  
1) Could you help me find and obtain a copy of this EIR document?  
I can only find copies of Negative Declarations.

The Margarite/Airport EIR is being redone or rewritten apparently because the first one was not adequate or acceptable. I cannot find a certified Environmental Impact Report on the Sports Field project, or on the 2000 General Plan Prado Road Extension Circulation Element Amendment.

I look forward to hearing from you. Please feel free to e-mail or send hard copy to my home address. Thank you.

Sincerely,

Mila Vujovich-La Barre

Cc Romero

Mila.Vujovich-La Barre  
e-mail: milavujov@hotmail.com
August 21, 2003

Mila Vujovich LaBarre
650 Skyline Drive
San Luis Obispo, CA 93405

Dear Ms. Vujovich LaBarre,

You recently wrote me a letter asking several questions about an e-mail I had sent to Elise Wheeler. My response to Ms. Wheeler addressed her questions concerning an archaeological study that was done for the Damon-Garcia sports fields project. I will attempt to answer your questions in this letter.

The first questions you asked me related to Ken Hampian’s comments at the July 15 City Council meeting. As I indicated in my e-mail, I was not present at that Council meeting, and so my reference was simply to statements heard on the videotape of that meeting. The archaeological study to which he referred is the “Evaluation of Cultural Resources at the Proposed Damon-Garcia Project” that was done for the sports field project, the “current project” to which Mr. Hampian referred. The results of the study were part of the information provided for the project’s environmental work. Because the alignment of Prado Road affected the design of the sports fields project, the study included the preliminary road alignment.

The second question you asked related to a statement I made in error in my e-mail. You are correct that there was not an Environmental Impact Report done for the sports field project. The project was given a Negative Declaration instead. I am sorry if my misstatement may have caused confusion on your part.

I hope these answers clear up the questions my e-mail may have created.

Sincerely,

Wendy George
Assistant City Administrative Officer

Cc: Mayor Romero
    Ken Hampian
RESOLUTION NO. (1999 Series)

RESOLUTION OF THE CITY COUNCIL OF THE CITY OF SAN LUIS OBISPO
APPROVING A PURCHASE AND SALES AGREEMENT WITH THE TRUSTEES OF
THE DAMON FAMILY TRUST AND THE CO-TRUSTEES OF THE ROY A GARCIA
REVOCABLE TRUST FOR THE ACQUISITION OF 23.5 ACRES OF THE DAMON-
GARCIA RANCH, AT A COST OF $2,000,000, FOR THE PURPOSE OF
CONSTRUCTING SPORTS FIELDS

WHEREAS, the City of San Luis Obispo (City) is a California Charter Municipal
corporation; and

WHEREAS, the City, acting through its City Council, has determined that a 23.5 acre
portion of the Damon-Garcia Ranch in the City is an appropriate site on which to construct
sports fields; and

WHEREAS, additional sports fields is a community need, identified in the Parks and
Recreation Element/Master Plan approved by the City Council in 1997; and

WHEREAS, the Trustees of the Damon Family Trust and the Co-Trustees of the Roy
A. Garcia Revocable Trust, the legal owners of this property, have agreed to its sale; and

WHEREAS, the purchase of this property would serve an important municipal purpose.

NOW, THEREFORE, BE IT RESOLVED that the City Council of the City of San
Luis Obispo hereby approves this purchase and sales agreement and the conditions described
therein.

BE IT FURTHER RESOLVED that the Council finds this purchase is exempt under
Section 15325 of the California Environmental Quality Act.

BE IT FURTHER RESOLVED that the Mayor is authorized to sign the Purchase and
Sales Agreement.

Upon motion of ____________, seconded by ____________, and on
the following roll call vote:

AYES:
NOES:
ABSENT:

the foregoing resolution was passed and adopted this ___ day of ______, 1999.
Resolution No. 
Page 2 
(1999 Series)

ATTEST:

Lee Price, City Clerk

Mayor Allen Settle

APPROVED AS TO FORM:

Jeff Norgensen, City Attorney

ElGardi purchased
ATTACHMENT 2

RECOMMENDED CEQA STATEMENT/ACTIONS AND FINDINGS FOR STAFF REPORT/ASRs

A. CEQA COMPLIANCE STATEMENT (FOR TEXT OF STAFF REPORT/ASR):

The CEQA compliance statement, located in the text of the staff report or body of the ASR under "Additional Data", shall include the following statement unless advised otherwise by County Counsel or the Manager, Land Use Planning (LUPD).

In accordance with CEQA Guidelines, Sections 15316, 15318 and 15325, Class 16 (Transfer of Ownership of Land in Order to create Parks) Class 18 (Designation of Wilderness Areas) and Class 25 (Transfers of Ownership of Interest in Land to Preserve Existing Natural Conditions), the proposed project is exempt from the provisions of CEQA, which reflects the independent judgment of the lead agency, Orange County, and satisfies the requirements of CEQA. The project is exempt because it involves transfers of ownership of land for open space purposes and preservation of natural conditions.

B. RECOMMENDED ACTION STATEMENT FOR APPROVING PROJECT:

State law requires that the decision-maker, prior to approval of the project for which it has been prepared, take action on a CEQA document. The following action must be taken before action on the project, unless directed otherwise by County Counsel or the Manager, OC Planning, LUPD.

1. Find that the proposed project is Categorically Exempt from CEQA per Sections 15316, 15318 and 15325; Class 16 (Transfer of Ownership of Land in Order to create Parks) Class 18 (Designation of Wilderness Areas) and Class 25 (Transfers of Ownership of Interest in Land to Preserve Existing Natural Conditions) of the CEQA Guidelines.

Note that the following finding is an administrative finding and it is not necessary to include in the findings for the decision-maker:

FISH AND GAME CODE FINDING FOR APPROVAL OF PROJECT:

Find that pursuant to Section 711.4 of the California Fish and Game Code, as amended, this project is not exempt from the required California Department of Fish and Game (DFG) Code fees unless it has been determined by DFG to have "No Effect". A copy of the written determination of "No Effect" must accompany this NOE form to exempt the required fees.
Attachment E
Dear Mr. Myers,

I am enclosing two more Sacred Lands Inventory forms for CA-SLO-1427 and CA-SLO-2040. I would like you to enter into the Sacred Lands File.

Also on July 17, 2000, I sent you three other inventory forms for CA-SLO-16, CA-SLO-41 and CA-SLO-239. I was also wondering if these have been entered into the Sacred Lands File.

The first form is for a very special place, which is located on which was private ranch land. When you stood above the mortar area along the ridge what a spectacular view you can see as the two valleys merged. I could feel the spirituality of the place and my heart filled, especially after talking to the Gracias who have owned the land for the past fifty years and explained to me that the area had not been touched or changed in that time.

The next form is for EAGLE ROCK a very special and spiritual spot for the local Playano people, since we were children we were told stories of the place. That this is were we could go to pray to creator for this was his spot long ago.

Sincerely,

Patti Dunton
Cultural Specialist, PSHS
377 Fairview Ave, Morro Bay CA 93442
Fax 805-772-7661
November 17, 2000

Patfi Dunton
Cultural Specialist, PSHS
377 Fairview Ave.
Morro Bay, CA 93442

Dear Patfi:

Thank you for your recent submittals of two sites for the Native American Heritage Commission Sacred Lands File. They have been entered into the database. The three sites that you submitted in July have also been entered. If you have any questions, please call me at (916) 653-4040.

Sincerely,

[Signature]

Rob Wood
Associate Government Program Analyst
January 10, 2001

James Gary Maniery, Principal
PAR Environmental Services, Inc.
P.O. Box 160756
Sacramento, California 95816-0756

Subject: Proposed Route 101/Prado Interchange Project, San Luis Obispo County, California (PAR REF. No. 00-808)

Dear Mr. Maniery,

Back in July 2000, you sent a letter to my brother, Mr. John Burch. Concerning the above project. He turned it over to me, to respond to.

My name is Patti Dunton; I am the cultural specialist for Playano Salinan Heritage Services. We are a business dedicated to the education and preservation of the Coastal Playano Salinan People. We offer qualified Consultants, Monitors and Archaeological Technicians.

I recently worked on a project. The proposed Damon Garcia Sports Complex in the City of San Luis Obispo. Construction of the sports complex is not likely to affect any archaeological resources, however, construction of the Prado Road extension east of Highway 101, as currently designed, will adversely affect site CA-SLO-1427.

I'm not sure if the proposed Prado Road Interchange will affect any cultural resources. Unless it impacts areas of Prado Road east of Highway 101. In which, I would have some concern. It would be unfortunate if the design for the interchange contain, continuing Pard Road to the east. Any such plans would have to be discussed. I believe any extension of Pard Road to the east of lower Higuera Street in San Luis Obispo, CA. Could have adverse effects to CA-SLO-1427.

The Playano Salinan people have lived along the Central Coast for thousands of years. Many of our families still live in the area, for this land is who we are.

As our ancestral lands are becoming more and more developed we have many concerns. Our ancestors have left these special places for us to care for and to watch over. It is our responsibility to share knowledge in preserving and caring for Playano Salinan Cultural Resources.

Please send me an update on this project.

Thank You,

Patti Dunton, Cultural Specialist, Playano Salinan Heritage Services, 377 Fairview, Morro Bay, CA 93442. (805)772-7559 or fax (805)772-7661.
Attachment F
The land was purchased for recreation by the City of SLO, and an additional 16 acres of Davenport Sports Fields were purchased by the Town of the Remainder of the 23.5 acres of adjacent properties.

This is a proposed "pro-sports, pro-people" plan for the remainder of the adjacent property.

Vehicle entrance equipment and parking for spectators.

Bike path

Hike and pedestrian entrance from Beach Street

Bike and pedestrian entrance from Beach Street

Play structure for children

Bench

Bench

Bench

The South Hills Open Space

groomed grass trail along

Potential Uses of the Davenport-Carson Sports Fields

South Hills
Letter P16 Mila Vujovich-La Barre

Response to Comment P16-1
This comment expresses concern that comments submitted regarding the Notice of Preparation for the LUCE Update EIR were not addressed in the LUCE Update Draft EIR. As indicated by the Notice of Preparation responses provided in Draft EIR Appendix E, EIR Section 4.15, Traffic and Circulation, provides an impact analysis of the city-wide circulation improvements, policies, and implementation programs that have been included in the proposed Circulation Element. The Notice of Preparation response also indicates that as future circulation improvements are proposed for actual construction, individual projects will be reviewed for impacts and policy consistency.

Please also refer to Master Response #2, Programmatic Nature of the EIR.

It should also be emphasized that the LUCE Update Draft EIR analysis focuses on proposed land use development and street network changes that would result from proposed changes to existing or baseline environmental conditions. As indicated on Draft EIR page 4-335, consistent with CEQA case law and the Caltrans Guide for the Preparation of Traffic Impact Studies (December, 2002), the previously proposed extension of Prado Road is a programmed roadway improvement with an identified funding source, and that future condition (the extension of Prado Road) is reflected as part of the future baseline conditions from which Project-related changes in environmental conditions are evaluated. No changes to the previously proposed and approved alignment of Prado Road are proposed by the Circulation Element, and the proposed extension of Prado Road has been extensively evaluated by other environmental review documents. Please refer to response 16-6 below for additional information regarding the environmental impact evaluations that have been completed for the previously proposed extension of Prado Road. Since the planned extension of Prado Road has been extensively evaluated by other environmental review documents, and no changes to the programmed road alignment are included in the proposed Circulation Element, another comprehensive review of Prado Road extension impacts was not included in the Draft EIR, nor was another evaluation of potential impacts required to be included in the EIR.

Response to Comment P16-2
This comment provides opinions regarding the LUCE Update Committee. Although the information provided by this comment does not pertain to the adequacy of the environmental impact analysis provided in the Draft EIR, the comment has been noted and will be provided to the Planning Commission and City Council for consideration in the decision-making process.

Response to Comment P16-3
This comment provides opinions regarding the LUCE Update Committee. Although the information provided by this comment does not pertain to the adequacy of the environmental impact analysis provided in the Draft EIR, the comment has been noted and will be provided to the Planning Commission and City Council for consideration in the decision-making process.

Response to Comment P16-4
This comment provides suggestions for the revision of or edits to the proposed LUCE Update EIR related to the effects of climate change, and associated circulation improvements and potential water supply impacts. Chapter 4.7 (Global Climate Change) provides an analysis how the proposed LUCE Update could result in climate change-related impacts. That analysis concluded that the incremental contribution of GHG emissions associated with adoption and implementation of the proposed LUCE Update would not be cumulatively considerable. This determination is based, in part, on the extensive policy and program requirements of the LUCE Update related to the reduction of greenhouse gas emissions, including the implementation of a wide variety of alternative transportation programs that do not rely on individual vehicle trips. In regard to water supply, Draft EIR chapter 4.16, Utilities and Service Systems, evaluated the potential for the LUCE Update to result in water supply impacts. As indicated on Table 4.16-6, Water Supply Reliability, adequate water supplies would be available to serve the City even under extended drought conditions. Although the information provided by this comment does not pertain directly to the adequacy of the environmental impact analysis provided by the Draft EIR, the comment has been noted in Appendix of the Final EIR and will be provided to the Planning Commission and City Council for consideration in the decision-making process.
Please also refer to Master Response #1, Comments Specific to the LUCE Update Concepts and/or Policies.

**Response to Comment P16-5**

Please refer to Draft EIR Figure 4.15-3, which depicts existing and proposed bicycle paths in the City. Chapter 4 of the proposed Circulation Element also includes policies and programs to promote bicycle circulation throughout the City.

**Response to Comment P16-6**

This comment provides general opinions regarding the planned extension of Prado Road. Although the information provided by this comment does not pertain directly to the adequacy of the environmental impact analysis provided in the Draft EIR, the comment has been noted and will be provided to the Planning Commission and City Council for consideration in the decision-making process.

In regard to the comment about the design of Prado Road, the roadway is planned as a four lane facility and was modeled as such by the Draft EIR’s analysis of potential Project-related circulation impacts. An interim two-lane section of Prado Road is contemplated but the proposed 2035 roadway cross-section is four lanes. Draft EIR Table 4.15-2 (Local Roadway LOS) indicated that Prado Road would be a two lane road, and that typographical error has been revised as follows in the Final EIR:

<table>
<thead>
<tr>
<th>ID #</th>
<th>Location</th>
<th>Road Type</th>
<th>Lanes</th>
<th>Divided Roadway</th>
<th>Left Turn Lanes</th>
<th>Baseline</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>79</td>
<td>Prado (Madonna – US 101)</td>
<td>Arterial</td>
<td>24</td>
<td>NOYES</td>
<td>YES</td>
<td>6,818</td>
</tr>
<tr>
<td>80</td>
<td>Prado (US 101 - Higuera)</td>
<td>Arterial</td>
<td>24</td>
<td>NOYES</td>
<td>YES</td>
<td>6,818</td>
</tr>
<tr>
<td>81</td>
<td>Prado (Higuera – Broad Street)</td>
<td>Regional</td>
<td>24</td>
<td>NOYES</td>
<td>YES</td>
<td>3,202</td>
</tr>
</tbody>
</table>

Draft EIR Table 4.15-2 also indicates that the segment of Prado Road between Higuera and Broad Street would be a “Regional Route,” which is defined by Draft EIR Table 4-15-1 as a roadway that connects the City with other parts of the county and is used by people traveling throughout the county and state and is designated as a primary traffic carrier. The segments of Prado Road between Madonna and US 101, and US 101 and Higuera, are identified as an “Arterial Street,” which is defined by Table 4.15-1 as a street that provides circulation between major activity centers and residential areas.

In regard to the environmental review of the previously proposed extension of Prado Road, several environmental studies have been completed for a Prado Road extension and interchange, including studies done for the 1994 Land Use and Circulation Elements (which included the “old” Industrial Way alignment), the 2000 amendment of the Circulation Element that adopted the current “northerly” alignment, and the EIR for the Airport Area and Margarita Area Specific Plans. Information from the adopted Mitigated Negative Declaration for the Damon-Garcia Sports Fields and the EIR the San Luis Marketplace also included Prado Road.

The Master EIR that was certified for the 1994 Land Use and Circulation Element update analyzed three potential alignments for the extended roadway, with the City Council settling on an Industrial Way alignment. After further consideration of the problems associated with that alignment (along with a Tank Farm Road alternative), in February 2000 the City Council adopted a new northerly alignment. In completing the Circulation Element amendment needed to implement this change, an environmental study for the northerly alignment and interchange was completed and accepted by the Planning Commission and City Council.

CEQA requires additional environmental review if a project substantially changes, or significant new information becomes available before construction. As described in response 16-1 above, the project description for the Prado Road alignment and the interchange has not changed significantly since 2000. In addition, the Prado Road extension and interchange have been considered together consistent with CEQA requirements and have not been segmented or “piecemealed.” Please note that after the completion of required environmental review, it is permissible for a project (such as the Prado Road extension project) to be constructed in phases.
Response to Comment P16-7

Please refer to Response to Comment P16-6.

Response to Comment P16-8

Draft EIR Section 4.5 (Cultural Resources) identifies a comprehensive suite of policies that require the assessment of potential project-related impacts to archaeological resources, and if necessary, the implementation of appropriate mitigation measures. These policies would apply to an extension of Prado Road and/or the new bike path referred to by this comment. The EIR concluded that the implementation of the identified policies would reduce potential impacts to archaeological resources to a less than significant level.

Response to Comment P16-9

A full access interchange is currently adopted in the regional transportation plan and the City’s general plan, this EIR evaluated the effects of changing the planned full interchange to an overpass only at a programmatic level. It was found that revising the plan to an overpass would result in increased traffic to the Los Osos Valley Road and Hwy 101 interchange, the Madonna and Hwy 101 interchange, and the Marsh and Hwy 101 interchange, likely requiring upgrades to those interchanges. Also traffic volumes and congestion levels at Higuera and Madonna and Los Osos Valley Road and Hwy 101 would be beyond acceptable thresholds, and therefore, it was found that the full access interchange currently planned should not change.

Please refer to Response 16-6 in regard to the comprehensive environmental review that has been conducted for the Prado Road extension project.

Since the alternative of providing an overpass along Prado Road over US 101 was rejected by the Draft EIR, no further analysis of how an overpass might affect development in the vicinity is necessary.

Response to Comment P16-10

Impacts to schools and emergency services that could result from the buildout of the LUCE Update were based, in part, on future population projections for the City. As indicated on Draft EIR Table 2.4-3 (Total Future Development Capacity within the Planning Subarea) population associated with the buildout and occupancy of the Margarita Specific Plan was included in the population projections used to conduct the impact analysis. Please note that the Margarita area is planned to have approximately 868 residential units.

Response to Comment P16-11

This comment provides suggestions for the revision of or edits to the proposed LUCE Update as it relates to the proposed Pacific Beach High School Site. Although the information provided by this comment does not pertain to the adequacy of the environmental impact analysis provided by the Draft EIR, the comment has been noted in Appendix of the Final EIR and will be provided to the Planning Commission and City Council for consideration in the decision-making process.

Please also refer to Master Response #1, Comments Specific to the LUCE Update Concepts and/or Policies.

Response to Comment P16-12

This comment expresses concerns and opinions regarding the Chevron Tank Farm Remediation and Development Project. The effects of that project were not analyzed as part of the LUCE Update. The Draft EIR environmental impact analysis is limited to the potential environmental effects related to the land use and circulation changes in the updated Land Use and Circulation Elements of the General Plan. The cumulative project setting includes buildout as allowed under the proposed Land Use and Circulation Elements. Although the information provided by this comment does not pertain to the environmental impact analysis provided in the Draft EIR, the comment has been noted and will be provided to the Planning Commission and City Council for consideration in the decision-making process.

Response to Comment P16-13

This comment expresses concerns and opinions regarding the eventual design of the San Luis Ranch Specific Plan area. The analysis of potential impacts that may result from the development and occupancy of the San Luis Ranch Specific Plan was based on reasonable assumptions regarding the potential development characteristics of that site. It is recognized that the subsequent design of the Specific Plan may vary from assumptions used by the Draft EIR, however those changes
would be evaluated as part of the project-specific environmental review required for future development consistent with the requirements of CEQA and City Policy 12.3.11 Environmental Review.

Please also refer to Master Response #2, Programmatic Nature of the EIR.

This comment indicates that future development on the San Luis Ranch Specific Plan site would be affected by airport operations. This potential impact was evaluated in Draft EIR Section 4.8, Hazards and Hazardous Materials. That analysis concluded that compliance with the proposed policies and regulations, including use limitations and overflight notification and aviation easements, would ensure that future development under the LUCE Update would not result in significant airport-related safety hazards.

This comment also provides suggestions for the revision of or edits to the proposed LUCE Update as it relates to impacts to agricultural soils on the San Luis Ranch Specific Plan site, and disagrees with the conclusion of the Draft EIR that the agricultural soil impacts of the San Luis Ranch Specific Plan can be reduced to a less than significant level. The comment has been noted in Appendix of the Final EIR and will be provided to the Planning Commission and City Council for consideration in the decision-making process.

Please also refer to Master Response #1, Comments Specific to the LUCE Update Concepts and/or Policies.

Response to Comment P16-14
Please refer to Response to Comment P16-13.

Response to Comment P16-15
Please refer to Response to Comment P16-9.

Response to Comment P16-16
This comment asks if the construction of a pedestrian and bike-bridge to improve access to the Foothill Plaza area is included in the LUCE Update and EIR. A grade separate bike/pedestrian crossing was a part the travel demand modeling and is included in the LUCE Update. Please refer to Site 1 on Table 2.5-1 that lists circulation improvements included in the Proposed Project, Policy 5.0.5 of the Land Use Element Update for policy language encouraging pedestrian crossing, and Policy 8.3.3.1 in the Land Use Element that talks about these improvements as they could be associated with development at the Foothill Boulevard / Santa Rosa Area site.

Response to Comment P16-17
This comment provides suggestions related to providing public art and entry ways to the city core. The City of San Luis Obispo currently administers a Visual Arts in Public Places program that encourages public art in new and existing buildings, parks, streets and other development projects for the enjoyment of its citizens and visitors. For most of its capital projects, the City sets aside 1% of the construction cost to a city-wide fund used to support other worthwhile public art projects. Although the information provided by this comment does not pertain to the adequacy of the environmental impact analysis provided by the Draft EIR, the comment has been noted in Appendix of the Final EIR and will be provided to the Planning Commission and City Council for consideration in the decision-making process.

Please also refer to Master Response #1, Comments Specific to the LUCE Update Concepts and/or Policies.

Response to Comment P16-18
This comment provides suggestions related to improving communication with Cal Poly. Although the information provided by this comment does not pertain to the adequacy of the environmental impact analysis provided by the Draft EIR, the comment has been noted in Appendix of the Final EIR and will be provided to the Planning Commission and City Council for consideration in the decision-making process.

Please also refer to Master Response #1, Comments Specific to the LUCE Update Concepts and/or Policies.
Andrew:
The numbers you are asking about are based on the City’s adopted CAP, which can be downloaded here [http://www.slocity.org/communitydevelopment/CAP/CAP%20Final%20Web.pdf]. To ensure full public engagement, further questions and comments regarding materials in the Draft Program EIR will be treated as comments on this document and responded to as part of the Final Program EIR.
Thank you.

Kim Murry
Deputy Director

CITY OF SAN LUIS OBISPO

Community Development
Long Range Planning
919 Palm Street, San Luis Obispo, CA 93401-3249
E kmurry@slocity.org
T 805.781.7274
slocity.org

---

Hi Kim –

We’re looking at Table 4.7-2, “CAP Community-wide GHG Emissions Reductions in 2020 and 2035” on page 4-146. In the Target Emissions Limit category, how was the 2035 target limit determined?

Thanks,

Andrew Christie, Director
Santa Lucia Chapter of the Sierra Club
P.O. Box 15755
Response to Comment P17-1
The numbers being questioned in this comment are based on the City’s adopted Climate Action Plan (CAP) dated August 2012, which can be downloaded here: http://www.slocity.org/communitydevelopment/CAP/CAP%20Final%20Web.pdf.
To ensure full public engagement, further questions and comments regarding materials in the Draft Program EIR will be treated as comments on this document and responded to as part of the Final EIR.
CALL TO ORDER

A Special Joint meeting of the City of the San Luis Obispo City Council and Planning Commission was called to order on Tuesday, July 1, 2014 at 5:00 p.m. in the City Council Chamber, located at 990 Palm Street, San Luis Obispo, California, by Mayor Marx.

ROLL CALL

Council Members
Present: Council Members John Ashbaugh, Dan Carpenter, Kathy Smith, Vice Mayor Carlyn Christianson, and Mayor Jan Marx

Council Members
Absent: None

Planning Commissioners
Present: Planning Commissioners Hemalata Dandekar, Michael Draze, John Fowler, Ronald Malak, William Riggs, Vice-Chairperson Michael Multari, and Chairperson John Larson

Planning Commissioner
Absent: Hemalata Dandekar and Ronald Malak

City Staff
Present: Katie Lichtig, City Manager, Christine Dietrick, City Attorney, Michael Codron, Assistant City Manager, and Anthony Mejia, City Clerk, were present at Roll Call. Other staff members presented reports or responded to questions as indicated in the minutes.
PUBLIC HEARING

PH1. PRESENTATION OF THE PUBLIC HEARING SCHEDULE OF THE LAND USE AND CIRCULATION ELEMENTS OF THE GENERAL PLAN (LUCE) UPDATE AND DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) TO PLANNING COMMISSION AND CITY COUNCIL

City Attorney Dietrick explained that Council Members Ashbaugh, Carpenter, and Smith have conflicts of interest and Planning Commissioner Draze and Fowler have potential conflicts of interest as interpreted under by the Political Reform Act (as administered by the Fair Political Practices Commission) in relation to the Land Use and Circulation Element (LUCE) update and will be recusing themselves; advised that the rule of necessity applies due to a lack of quorum available for City Council and Planning Commission deliberations. Following a random drawing by lot, Council Member Smith and Commissioner Draze returned to the dais and Council Members Ashbaugh and Carpenter and Commissioner Fowler left the Chambers at 5:12 p.m.

Community Development Director Johnson, Traffic Manager Hudson, and Jeff Oliveira, Oliveira Environmental Consulting, narrated a PowerPoint presentation entitled “Land Use and Circulation Element” and responded to Council and Planning Commission inquiries. Hudson explained level of service impact resolution per project.

Mayor Marx opened the Public Hearing.

Eugene Jud, San Luis Obispo, questioned whether an extension on comments to the Environmental Impact Report (EIR) is possible; narrated a PowerPoint presentation entitled “LUCE+” related to traffic circulation and traffic management.

Myron Amerine, San Luis Obispo, noted that the Draft Environmental Impact Report (DEIR) is a progressive document which moves forward with bicycle and pedestrian issues; voiced concern that bicycle and pedestrian issues are underfunded; expressed the design of City should be to increase pedestrian traffic.

There being no others desiring to speak on this item, the Public Hearing was closed.

Following discussion, the City Council and Planning Commission received and filed a presentation on the LUCE and DEIR.

ADJOURNMENT

Council adjourned the Special Joint Meeting at 6:25 p.m.
Response to Comment PH1-1
Please refer to responses P3-1 through P3-4, which respond to similar comments made by Mr. Eugene Jud.

Response to Comment PH1-2
This comment provides an opinion regarding the funding of proposed bicycle circulation improvements. Although the information provided by this comment does not pertain to the adequacy of the environmental impact analysis provided in the Draft EIR, the comment has been noted and will be provided to the Planning Commission and City Council for consideration in the decision-making process.
ROLL CALL:

Present: Commissioners Patricia Andreen, Ken Curtis, Suzan Ehdaie, Amy Nemcik, Allen Root, Vice-Chair Greg Wynn, and Chairperson Michelle McCovey-Good

Absent: None

Staff: Senior Planner Pam Ricci, Associate Planner Brian Leveille, Assistant Planner Walter Oetzell, Principal Transportation Manager Peggy Mandeville, and Recording Secretary Diane Clement

ACCEPTANCE OF THE AGENDA:

The agenda was accepted as presented.

MINUTES:

The minutes of July 7, 2014, were approved as presented.

PUBLIC COMMENTS ON NON-AGENDA ITEMS:

There were no comments made from the public.

PUBLIC HEARINGS:

1. **City-Wide.** GPI/ER 15-12; Review of design-related references in the General Plan Land Use and Circulation Elements Update and aesthetics section of the Environmental Impact Report (EIR); City of San Luis Obispo – Community Development Dept., applicant. (Brian Leveille)

   Associate Planner Leveille presented the staff report, recommending discussion of the Draft Environmental Impact Report (DEIR) impact evaluation for aesthetics and providing comments for inclusion and response as part of the LUCE EIR.

   **PUBLIC COMMENTS:**

   Eric Meyer, TF LUCE chair, stated that comments should be aimed at making changes to the Community Design Guidelines.

   There were no further comments made from the public.
COMMISSION COMMENTS:

Commr. Wynn stated that Mr. Meyer is correct in noting that the Land Use Element EIR does not prevent Commission modifications to the Community Design Guidelines although modifications must be approved by the City Council.

Commr. Curtis stated that he hopes City-adopted thresholds of significance are included in the EIR because it makes the EIR more defensible. He stated that he has an overall sense that the Draft EIR greatly understates the impacts on scenic and visual resources by not describing them as Class 1 impacts, which creates a weakness making it easier to legally challenge. He stated that it is the responsibility of the EIR to address this cumulatively. He noted that he is also bothered by the lack of measurement of visual impacts and gave the commercial development allowed on Los Osos Valley Road as an example. He stated that if someone saw before and after photos, they would say there has been a significant view impairment impact diminishing the quality of the view. He noted that both the foreground and background of a view should be considered.

Commr. Andreen stated that she supports Commr. Curtis’s statement in general and that it is appropriate for this Commission to express these concerns. She noted that she is not comfortable with the Class 3 impact designation and would prefer more elastic language that would give the City the tools to address potential loss of view sheds along more than just the scenic roadways.

Principal Transportation Planner Mandeville asked the Commission to keep in mind that there was environmental analysis on the General Plan and that the Draft EIR is just about changes. She noted that most empty sites in the City already have plans for development.

Associate Planner Leveille stated that if the ARC does not make a comment as a commission via a motion, then individual Commissioners can make comments through the process provided. He noted that the Draft EIR is programmatic and only a review of broad policy objectives.

Senior Planner Ricci cautioned the Commission about making a leap from class 3 to class 1 impacts. She noted that there would be changes to the Land Use Map only for the areas studied, such as Calle Joaquin, as part of the EIR process.

Commr. Ehdaie noted that this is a programmatic EIR.

Mr. Meyer stated that the Specific Plans, not the EIR, is where the details will be studied.

Commr. Root supported Commr. Curtis’s comments about measuring impacts and Commr. Andreen’s comments about broadening of the scope. He proposed narrowing the Commission’s suggestions to just those two issues.
There were no further comments made from the Commission.

On motion by Commr. Ehdaie, seconded by Commr. Andreen, to approve the language of the Draft EIR as presented with the recommendation that measurement tools and analysis be developed that assess impacts on aesthetic resources, and that the EIR conclusion that cumulative impacts to visual resources are insignificant (Class III) may be understating overall aesthetic impacts to scenic resources.

AYES: Commrs. Ehdaie, Andreen, Curtis, McCovey-Good, Nemcik, Root, and Wynn
NOES: None
RECEIVED: None
ABSENT: None

The motion passed on a 7:0 vote.

2. **163 Suburban Road.** ARC 39-14; Review of two industrial buildings for a brewery and for manufacturing and storage uses, each with a caretaker residence; M-SP zone; Earthwood Lane Properties, LLC, applicant. *(Walter Oetzell)*

Assistant Planner Oetzell presented the staff report, recommending continued consideration of the application to a future date with direction on potential design changes that would ensure adequate parking for likely future uses of the site, reduce uniform and continuous wall planes, facilitation solid waste collection, and refine project signage.

**PUBLIC COMMENTS:**

Scott Martin, architect with RRM Design Group, stated the intent is for only industrial use but there may be other uses. He noted this project is on two parcels, that the design is focused on the internal elevations and the street view, and there will be a brewery and tasting room. He stated that he was hoping to come to agreement with potential conditions at this meeting and he would rather not continue the project. Senior Planner Ricci responded that staff was not prepared with a resolution so it will be continued. Mr. Martin noted that there will be 24 on-site parking spaces including two spaces in a caretaker’s garage, and that maneuverability for trash trucks complies with code and has been approved by the trash company. Senior Planner Ricci asked if the approval by the trash company was in writing. Pat Blote, RRM Design Group, stated it was verified via email but that written approval could be provided.

Max Montgomery, property owner and future owner of the brewery, stated that the tasting room will accommodate a maximum of 49 individuals. Mr. Blote added that this brewery will be similar to the Tap It Brewery where the experience has been that the parking spaces are vacated after regular business hours, leaving plenty of space for brewery guests.
Response to Comment PH2-1
This comment provides an opinion regarding the analysis provided by the Draft EIR regarding the significance of cumulative aesthetic impacts, and that the City should develop “measurement tools” to evaluate future impacts to aesthetic resources. Although the information provided by this comment does not directly pertain to the adequacy of the environmental impact analysis provided in the Draft EIR, the comment has been noted and will be provided to the Planning Commission and City Council for consideration in the decision-making process.
MISSION:
The purpose of the Bicycle Advisory Committee (BAC) is to provide oversight and policy
direction on matters related to bicycle transportation in San Luis Obispo and its relationship to
bicycling outside the City.

ROLL CALL:
CM Woolf called the meeting to order at 7:02 p.m.
Present: Jim Woolf (Chair), Howard Weisenthal (Vice Chair), Lea Brooks, Peter Deragon,
Paula Huddleston
Absent: Catherine Machado and Arlene Winn.
Staff: Peggy Mandeville, Jake Hudson, and Jennifer Rice

PUBLIC COMMENT:
There was no public comment.

MINUTES: May 15, 2014

CM Woolf noted that his name had been spelled incorrectly in several places.

Action: CM Brooks moved to approve the minutes as amended. CM Weisenthal seconded
the motion. The motion passed unanimously.

PRESENTATION ITEMS:
Agenda Item #1: Annual Traffic Safety Report

(This item was heard after Item #2.)
Mr. Hudson reported that throughout the year, the City monitors collisions and evaluates
corridors for ranking and trending of pedestrians, vehicles, and bicycles for developing
mitigation strategies.

Ms. Rice gave an overview on Bicycle Safety Project highlights during the last two years; annual
high-accident locations; and mitigation measures that are in place and proposed for the future,
e.g. green lanes.

CM Huddleston suggested that Santa Rosa/Foothill needed a green bike lane.

Public Comment:
Myron Amorino felt a pedestrian crosswalk or vehicle stop bars should be installed at the on/off
ramps by the CHP station on California.
Eric Meyer suggested wrong-way riding enforcement be stronger on Broad Street near Woodbridge.

Mr. Hudson discussed traffic control at Chorro/Mill and the test concept of neighborhood traffic circle noting that with the removal of the left turn lanes, the southbound Chorro Street bike lane could be extended on each side of the intersection.

CM Brooks, CM Weisenthal and CM Woolf favored the concept as discussed.

CM Huddleston was concerned that traffic habits on that street seem to show that motorists aren’t paying attention.

Mr. Amerine reiterated that sharrows need to be emphasized at the intersection.

The public comment period was closed.

Committee members indicated their support of the traffic circle concept as a whole and suggested using Bicycle Facility Improvement funds to support the installation.

Ms. Mandeville noted that the test concept would go the Council for approval.

CM Woolf asked about prioritization for action on intersections that have yet to have collisions reported.

CM Brooks and Mr. Meyer agreed that Pacific/Morro should be evaluated.

Mr. Hudson stated as time permits, staff would analyze intersections that have been identified as a concern yet do not have a history of collisions.

Action:

CM Brooks moved to recommend adoption of the Traffic Safety Report as presented and strongly endorse the traffic circle concept at Chorro/Mill. CM Deragon seconded the motion. The motion passed unanimously.

Agenda Item # 2: Bicycle Count Data

(This item was heard prior to Item #1.) Ms. Rice discussed the bike count data report, including an overview on methodology, data/ranking comparisons and actual count information collected from a professional counting service. She noted the count could be performed every two years with consistency, with actual calculation of modal splits. She also discussed total annual bike volume numbers.

Mr. Hudson noted that there could be exploration in the future to add bike paths and determine helmet usage data.

Public Comment:

Mr. Amerine requested a copy of the presentation and volunteered to watch video footage from the Foothill/California intersection to determine bike helmet usage and wrong-way riding.

James Park noted there was significant sidewalk and wrong-way riding with earphones on Higuera south of Nipomo.
The public comment period was closed and no action was taken by the Committee.

**ACTION ITEMS**

**Agenda Item # 3: Land Use and Circulation Elements (LUCE) Update and Draft EIR**

Ms. Mandeville discussed the project’s draft environmental impact report (EIR) and requested that Committee members provide comments pertaining to the EIR.

Mr. Hudson discussed transportation forecasts, trip generation, trip distribution; mode choice; route choice; traffic flows; targeted travel and mode predictions. He noted that the Council had supported a significant increase in bicycle mode share, so there was an expectation that bicycle usage will increase more than any other mode). He identified intersections that would require some form of intersection control such as signalization or roundabout.

**Public Comment:**

Mr. Amerine noted that the proposed LUCE Update is an excellent document that provides the opportunity for the community to consider all modes of transportation and not just vehicles.

Eric Meyer, Chair of the LUCE Task Force, agreed with the previous speaker.

The public comment period was closed. No EIR related comments were submitted by the public or the Committee.

Ms. Mandeville noted that July 28, 2014 was the deadline for public and Committee comments on the EIR.

CM Brooks suggested that Council should approve the document for a multi-modal future and that Broad Street should not be widened. The Committee members agreed with her.

**ACTION:**

CM Brooks moved to recommend that Council certify the EIR and adopt the LUCE Update noting that the Committee recognizes the Update’s positive commitment to a multi-modal future with the implementation of the Update’s mode share split and transportation funding policies. CM Weisenthal seconded the motion. The motion passed unanimously.

Due to the lateness of the hour, the Committee agreed to continue the rest of the agenda items to the next regular meeting to be held September 18, 2014.

**ACTION:**

CM Brooks moved to adjourn the meeting at 9:15 p.m. CM Deragon seconded the motion. The motion passed unanimously.

Respectfully submitted,

Lisa Woske
Recording Secretary
Response to Comment PH3-1
This comment provides general support for the proposed LUCE Update project as it relates to the City’s multi-modal future. The comment has been noted and will be provided to the Planning Commission and City Council for consideration in the decision-making process.
ROLL CALL:

Present: Committee Members Sandy Beer, Thom Brajkovich, Hugh Platt, Victoria Wood, Vice-Chair Jaime Hill, and Chair Bob Pavlik

Absent: Committee Member Patti Taylor

Staff: Senior Planner Phil Dunsmore, Principal Transportation Manager Peggy Mandeville, Associate Planner Brian Leveille, Assistant Planner Walter Oetzell, and Recording Secretary Diane Clement

ACCEPTANCE OF THE AGENDA: The agenda was accepted as presented.

MINUTES: Minutes of June 23, 2014, were approved as presented.

PUBLIC COMMENTS ON NON-AGENDA ITEMS:

There were no comments made from the public.

PUBLIC HEARING ITEMS:

1. **1136 Iris Street**, ARCM 30-14; Review of remodel/addition to an existing contributing residence and addition of two new studio units; R-2-S zone; Robert Braunschweig, applicant. (Walter Oetzell)

   Member Wood recused herself and left the meeting.

   Assistant Planner Oetzell presented the staff report, recommending adoption of the resolution which recommends the Community Development Director approve the architectural review application related to this project, subject to conditions necessary to ensure consistency with The Historic Preservation Program Guidelines.

PUBLIC COMMENTS:

Architect Craig Smith, CRSA Architecture, representing the owner, stated that the project plans comply with the City’s development standards and have been reviewed by the Fire Department and the Building and Safety Division. He stated that the intent is to restore the original home, including the vertical columns on the front porch, to look exactly as it did when built. He added that the wood shiplap siding will be repaired and replaced where necessary with fiber cement siding that will look the same but last much longer than wood, the vinyl window frames will be replaced with wood replicating the original design, and the building will be retrofitted for fire and earthquake protection. He noted that in 2011 the City Council made changes to the language in the Historic Preservation Guidelines to make them more specific to San Luis Obispo and he
recommended making changes to the Conditions on page 1-111 of the Resolution to reflect that language.

There were no further comments made from the public.

**COMMITTEE COMMENTS:**

Member Hill commended the project. She suggested that the term “feasible” be replaced with “practicable” which means both feasible and practical. She stated that the sidewalk should be replaced as part of the project.

Mr. Smith stated that there will be a new sidewalk and apron.

Member Baer stated she supported replacing “feasible” with “practicable.” She added that the project design fits the area and provides needed housing.

Member Brajkovich asked what material will be used for the skirting on the house. Mr. Smith responded that the entire structure will have shiplap siding. Member Brajkovich asked about the material to be used for the band separating the first and second floors. Mr. Smith responded that it will be fiber cement which will be lapped with an eased edge and a larger and tighter overlap.

Member Brajkovich stated it looks like it will be hard to get vehicles into the garages. Mr. Smith responded that the 24-foot distance is compliant and is the usual space required in parking.

Member Pavlik asked if the back of the property will be fenced. Mr. Smith stated it will be landscaped with a bio-swale.

There were no further comments made from the Committee.

On motion by Committee Member Platt, seconded by Committee Member Brajkovich, to adopt the resolution recommending the Community Development Director approve the architectural review application related to this project, subject to conditions necessary to ensure consistency with The Historic Preservation Program Guidelines and changing “feasible” to “practicable.”

**AYES:** Committee Members Baer, Brajkovich, Hill, Pavlik, and Platt
**NOES:** None
**RECUSED:** Committee Member Wood
**ABSENT:** Committee Member Taylor

The motion passed on a 5:0 vote.

2. **774 Marsh Street.** CHCMA 88-14; Request to add property into the Mills Act program; C-D-H zone; Matthew Quaglino, applicant *(Walter Oetzell)*
Assistant Planner Oetzell presented the staff report, recommending adoption of the Cultural Heritage Committee Resolution recommending that the City Council enter into a Mills Act Historic Preservation contract for the Snyder Building (774 Marsh Street), under the terms described in the draft contract.

PUBLIC COMMENTS:

Eric Meyer, SLO, complimented the restoration of this building and noted that the building is 100% concrete. He stated that the current sprinkler system was required by the Fire Department some years back and that it negatively affected the ruined the aesthetics of the interior. He and noted the problematic nature of balancing accurate historic restoration vs. safety.

 Applicant Matt Quaglini noted that the Fire Department waived the need for an exterior sprinkler system based on the concrete construction.

There were no further comments made from the public.

COMMITTEE COMMENTS:

Applicant Matt Quaglini stated that the offset, according to the preliminary numbers, for this project under the Mills Act is much smaller than on two other buildings he has done.

Senior Planner Dunsmore stated that the County Assessor’s Office determines the taxes and the offset, and he will look into getting the correct numbers. Assistant Planner Oetzell stated that one difference is the risk factor in the capitalization and that two percent was used for this building while four percent is usual for a single family residence.

Member Brjakovich stated that the actual offset-tax savings should be known before construction.
Member Baer agreed.

Brjakovich asked about retrofitting in relation to the construction of the building.

Mr. Quaglini stated that the building is not on the retrofit list. He added that he had the building evaluated and there’s been very little settling, probably because it is so light. He noted that there is no wood in the building and even the interior walls are concrete.

Member Hill noted two corrections needed on page 2-13 in the report: the name of the City Clerk and the name of the building.

There were no further comments made from the Committee.

On motion by Committee Member Hill, seconded by Committee Member Baer, recommending adoption of the Cultural Heritage Committee Resolution recommending that the City Council enter into a Mills Act Historic Preservation contract for the Snyder Building (774 Marsh Street), under the terms described in the draft contract.
AYES: Committee Members Baer, Brajkovich, Hill, Pavlik, Platt and Wood
NOES: None
RECUSED: None
ABSENT: Committee Member Taylor

The motion passed on a 6:0 vote.

3. **City-Wide.** GPI 15-12; Review of historic/cultural-related references in the General Plan Land Use and Circulation Elements Update and Cultural section of the Environmental Impact Report (EIR); City of San Luis Obispo – Community Development Dept., applicant. *(Brian Leveille)*

Associate Planner Leveille presented the staff report, recommending discussion of the Draft Environmental Impact Report (DEIR) evaluation for cultural resources and that Committee Members provide comments for inclusion and response as part of the LUCE EIR.

**PUBLIC COMMENTS:**

Eric Meyer, chair of the LUCE Task Force, stated that the Task Force asked that new areas, such as Avila Ranch, have Specific Plans. Other areas, such as the Margarita area already have Specific Plans. He noted that the Task Force discussed the lack of pedestrian friendliness in some areas downtown and how the large government centers ruin the pedestrian experience. He noted that language was developed aimed at government building and that there were other tweaks in language. He added that the Task Force almost got into developing an entire pedestrian plan but lacked the time and did recommend the development of a pedestrian master plan.

There were no further comments made from the public.

**COMMITTEE COMMENTS:**

Member Hill stated she does not see anything about benign neglect of historic resources in the DEIR. Senior Planner Dunsmore responded that the Historic Preservation Ordinance addresses this but it does not talk about distinguish between publicly owned resources vs privately owned properties.

Member Brajkovich asked why changes were made in 4.0.19 Building Height.

Associate Planner Leveille clarified that this was an existing policy and that language changes were minor.

Principal Transportation Manager Mandeville responded to Committee questions on removal of the Land Use policy discussing pedestrian connections and clarified that 4.0.19 G was added which does contain the midblock crossing policy language, but provides more flexibility to meet the intent.
Member Hill stated that larger developments downtown are abandoning a street frontage in favor of a midblock pedestrian street-crossing such as Court Street and there should not be an option to do this.

Senior Planner Dunsmore responded that new downtown development has to address street frontage and that there are policies in the Community Design Guidelines which encourage addressing street frontages.

Member Hill stated that the LUCE should address maintaining public features and frontages on public streets.

Member Brajkovich stated that new development downtown does not have to supply parking and developers are simply paying the in lieu fees which means parking is being lost. He asked about the parking lot that will be lost to the new Copeland project.

Senior Planner Dunsmore stated that the current garages accommodate the need for parking for the near future, more are planned, and eventually all parking will be in parking structures since Land Use Policy calls for centralized parking locations because of the value of the land.

Member Brajkovich asked if this is addressed in the LUCE update.

Senior Planner Dunsmore stated it is addressed in other City documents existing land use element policy.

Member Pavlik noted the two ways to comment – as a committee or as an individual before midnight.

There were no further comments made from the Committee.

4. **1590 Lizzie Street**, CHC 133-14; Review of placement on the National Register of Historic Places; R-1 zone; City of San Luis Obispo, applicant. *(Phil Dunsmore)*

Senior Planner Dunsmore presented the staff report, recommending nomination of the Master List La Loma adobe property to the National Register of Historic Places.

**PUBLIC COMMENTS:**

Dunsmore noted that neighbors to this property were here but had to leave and stated to him that they are supportive of the nomination.

There were no further comments made from the public.

**COMMITTEE COMMENTS:**
No action items are identified in the minutes for the CHC hearing of July 28, 2014.
CALL TO ORDER: Chair Davis called the special meeting to order at 5:34 p.m.

ROLL CALL: Chair Davis and Commissioners Craig Kincaid, Michael Parolini, Ron Regier and Jeff Whitener

ABSENT: Ryan Baker, Susan Updegrove

COUNCIL: John Ashbaugh

STAFF: Shelly Stanwyck, Melissa Mudgett, Dave Setterlund, Brian Leveille, Peggy Mandeville

Public Comment
Councilmember John Ashbaugh thanked staff for their hard work on the Laguna Lake Nature Reserve Master Plan and reminded the Commission that Council approved the Master Plan at its meeting last week.

Commissioner Parolini echoed these sentiments and stated that most of the hard work came from City staff Bob Hill, Natural Resources Manager.

1. Proposed Donation for Community Gardens at the Laguna Lake Golf Course.

Director Stanwyck introduced Recreation Supervisor (Dave Setterlund) who serves as the Department’s supervisor for the Community Services program he provided the Commissioners with a little history about the Community Garden program. Begun in 1974 the program has grown to four locations over 177 garden plots and a waiting list of 100+. In 2010, the newest Community Garden, the Rotary Garden at Meadow Park was opened thanks to a donation by the City’s three rotary clubs

Recently Parks and Recreation has been approached by two local non-profit organizations, Monday Kiwanis Club and One Cool Earth, with the desire to plan and construct a new Community Garden. Dave Setterlund summarized the staff report contained in the PRC’s Agenda Packet.
One Cool Earth representative (Victoria Carranza, OCE Fellow) provided the Commission with a brief presentation about the proposed donation of a community garden and some options that the donor and grantee could pursue. She also noted the Kiwanis Club representatives were in the audience as the co-donors of the proposed project.

Public Comment
Meg Gleeson, resident on Prefumo Canyon and complex neighbor stated that the proposed community garden would be right under her bedroom window and that she is not in favor of the new community garden.

Commissioner Comments
Commissioner Parolini recalled a similar One Cool Earth project at Sinsheimer Park where trees were planted and died as the required watering did not occur as promised. He had concerns about the location adjacent to LOVR would like to see a suitable buffer between the garden and the road similar to that of the Rotary garden. He was very concerned about supporting this project without a solution of the water issue. He asked if there was precedent of Council waiving Water Impact Fees.

Director Stanwyck responded that staff a waiver of Impact Fees would require a funding subsidy from the General Fund to offset these costs.

Commissioner Regier commended the donors’ for their hard work and for providing a valuable asset to the community. He asked if this was the only site that was looked at for a community garden. He also expressed concerns relating to neighbors acceptance of this project. Director Stanwyck responded that currently there is no Community Garden Master Plans that defines potential new locations for community gardens. Director Stanwyck said that the Department sought neighborhood outreach by mailing 1,000 postcards to residents inviting them to the Commission meeting to learn about the project and to provide public comment. She indicated that our Department has received several phone calls from the mobile home neighbors who are delighted about this new opportunity.

Commissioner Regier expressed that the neighbor opposition was a concern. He stated that this also seems like a “natural use” for this area so he can see both sides of the discussion. He would like to see the donors and staff find a solution for water.

Commissioner Kincaid expressed his concerns that a lot of the project is contingent upon water and felt that this should be the priority over grant deadlines. He remains troubled by the inability to provide water to the gardens and the impact to neighbors.
Commissioner Kincaid said he was surprised that there weren’t any concerns about the impact to parking. Director Stanwyck responded that the Golf Supervisor (Todd Bunte) didn’t feel that there would be an impact to the daily parking needs and that parking could be accommodated throughout the day.

Vice Chair Whitener stated he did not want to rush to a decision without a solution to water and before this project. He encouraged the community to share their concerns or support with Council.

Chair Davis was concerned about the pressure to meet the grant deadline of December 31st. He stated he was in favor of the project but needed more time to determine the water source and provide for additional community outreach. He would like to see if The Community Foundation grant deadline could be extended.

**MOTION:** (Whitener/Kincaid) The Parks and Recreation Commission to make a recommendation to continue this item to the October 1, 2014 meeting to allow time to analyze water source options and provide for additional community outreach.

**Approved: 5 yes: 0 no: 2 absent**


Brian Leveille, Associate Planner, presented to the Commission the Draft EIR for the LUCE and noted that City staff, Peggy Mandeville (Senior Transportation Planner), and the LUCE Special Committee Chair (Eric Meyer) were also available in the audience to answer any questions as well.

Progress continues in the City’s focused update of its General Plan Land Use and Circulation Elements. In August 2013 the PRC reviewed proposed policy changes related to Parks and Recreation and provided feedback. Now the Draft EIR for the LUCE has been released for public review and comment. There is a 45-day public review and comment period which will end on July 28, 2014. Staff Leveille noted that tonight’s discussion allows the Commission and the public to comment about the recreation facilities portion of the report. He further added that any Parks and Recreation Commission comments during the public review period for the Draft EIR will be included in and responded to as part of the Final EIR and reviewed as part of the adoption of the LUCE.

Staff Leveille presented that the Draft EIR identified only Class 3 impacts to existing recreation facilities as part of the LUCE. The report noted that an increase in parkland reflects the desires of the community but is not defined as a mitigation measure.
Staff Leveille recapped for the Commission of the continuing review process.
- July 28, 2014 – Public Comment/Review Period closes
- July 28, 2014 – Cultural Heritage Committee review
- August/September – various Planning Commission meetings
- November 2014 – City Council, adoption of LUCE update

**Commission Comments**
Commissioner Parolini asked for a clarification on Impact Rec-1 as to why the goal of 10 acres/1,000 residents was not required. Staff Leveille responded that the Parks and Recreation Element identifies a goal of 10 acres/1,000 residents. The LUCE update identifies 5 acres/1,000 residents. The current data shows 3.14 acres/1,000 residents. As the LUCE update of 5/1,000 is a slight increase over current, it was not considered to worsen existing conditions and therefore categorized as a Class III impact. Commissioner Parolini asked if an evaluation of current policy was needed to help attain that goal.

Commissioner Kincaid asked about the difference between parkland and open space. Director Stanwyck responded that parkland and open space are different in their definitions of active and passive recreation. Parkland implies active recreation use such as sports, picnicking, playgrounds, field usage, etc. Open Space implies passive recreational use such as hiking, mountain biking or bird watching and the protection of natural resources. Parkland and Open Space are different and their acreages are not combined in calculating park acres per resident. Commissioner Kincaid offered that the two defined acreages could be combined to help attain the goal of 10 acres/1,000 residents.

Commissioner Regier asked about the impact analysis on page 2-39 of the agenda report for sustaining the condition of current parks and enhance usage. Commissioner Regier asked if this statement presumed that additional resources would be dedicated when park acreage is increased. Commissioner Regier noted that resources for ongoing maintenance continue to be stretched further. Staff Leveille responded that the EIR reports on the ratio of available parkland per resident and details about maintenance needs and financing are not included in this higher level evaluation. Commissioner Regier said that there should be a conscious effort to include additional resources for parks maintenance as part of the planning process.

Vice Chair Whitener questioned a conflict in acreage data between 52.4 and 29. Page 2.2 states additional 52.4 acres of parkland while page 2.39 states additional 29 acres as part of the Margarita Specific Plan Area. Staff Leveille provided the Commission with a table specifying acreage totals. Vice Chair Whitener continued that the EIR report only discusses impacts related to the increase in population however; there is an increase in day-time population from the workforce that is not accounted for in the draft report. He continued that additional workforce population who wish to recreate here (such as MindBody) are not...
addressed in the potential impacts. San Luis Obispo is the County seat and attracts daytime recreational use as well.

Chair Davis said the report shows a population increase of 20%. With that he noted that the City is already “behind” on additional sports fields and that there are lots of impacts from workers that want league play during the work-day. Chair Davis expressed that the demand will be there and that the increased usage will further deteriorate sports facilities if the City does not plan to meet this demand. Staff Leveille commented that the LUCE doesn’t breakdown use of each park but serves as a guidance document from a higher, more general level overview of parkland.

Public Comment
Eugene Jud, resident on Jeff Street, shared with the Commission his thoughts about the Prado Road alignment as presented in the LUCE. His recommended realignment that would instead connect to Tank Farm Road to avoid having to go through the sports field and historic land.

Eric Myer, Chair of the LUCE Update Committee, but speaking as an individual said the existing Land Use describes the build out of our community. While he agreed that the City could use more park space, he reminded the Commission that its role was to review and comment on the “updated” portion of the LUCE (not the entire Element).

Commission Discussion
Commissioner Kincaid commented that he would like to include the desire for more parkland (Community Parks). Commissioner Parolini stated he did not feel that the Draft EIR had acknowledged the impacts of daytime workers to existing parkland shortage. Staff, Peggy Mandeville, mentioned that a Parks and Recreation Commission representative would be welcomed at the Planning Commission meetings to further express and share the Commissions’ desires. She will email meeting dates to be forwarded to the Commissioners.

MOTION: (Regier/Whitener) The Parks and Recreation Commission have identified the following concerns and comments to be included as part of the official record of the review of the Draft Environmental Impact Report (DEIR) for the Land Use Conservation Element (LUCE);

1. The Parks and Recreation Commission finds that the City does not have sufficient community parks (active recreation areas for uses that include turf sports, soccer, rugby, lacrosse, diamond sports, and lit tennis courts) and locations to meet these community needs should be identified to address this insufficiency given the anticipated a increase in needed recreational facilities and their use with the increase in population associated with the adoption of the LUCE;
2. The Parks and Recreation Commission finds that the LUCE Draft EIR does not acknowledge the impacts of daytime workers and visitors to the City’s existing and future parkland;

3. The Parks and Recreation Commission finds that Cal Poly should be defined as a specific agency to negotiate with for joint use agreements for shared recreation uses of Cal Poly’s facilities;

4. The Parks and Recreation Commission recommends that the Council in the context of the LUCE and in future planning documents address the impacts to ongoing maintenance of existing parks facilities (from neighborhood parks to community parks, to facilities to paths to open space) and the need to remodel, refresh, and maintain the same.

Approved: 5 yes: 0 no: 2 absent

3. Cancellation of August 6, 2014 Meeting
*MOTION:* (Regier/Parolini) The Parks and Recreation Commission recommendation for the cancellation of the August 6, 2014 meeting;
*Approved: 5 yes: 0 no: 2 absent*

4. Communications

Chair Davis asked to add discussions about the Damon Garcia Sports Field maintenance and renovation to the September 3, 2014 agenda. Commissioner Parolini mentioned he saw a group of people out on the field last week that should have been on the field and contacted staff to let them know. Director Stanwyck added that the fields will open up on August 1st with two tournament weekends. Unfortunately the fields have not bounced back from the renovation period. Recreation staff is in communications with Public Works staff about this issue. Commissioner Parolini said he will try and get some aerial photos of the fields prior to this meeting.

**Adjourned to Parks and Recreation Committee Meeting on September 3, 2014**

Meeting adjourned at 7:12 pm to Wednesday, September 3, 2014 Meeting in the Council Hearing Room, 990 Palm Street, 5:30pm.
Response to Comment PH5-1
Please refer to responses P3-1 through P3-4, which respond to similar comments made by Mr. Eugene Jud.

Response to Comment PH5-2
The Draft EIR determined that the proposed LUCE Update would result in less than significant environmental impacts related to the provision of parkland in the city, although the existing condition where the City’s per capita parkland standard is not achieved would continue to exist. The City’s per capita parkland ratio standard is intended to meet the community’s desire for increased recreational opportunities, and is not considered to be a policy adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the identified inconsistency is not considered to be a significant environmental impact. Since a significant impact would not occur, the EIR is not required to identify additional potential parkland areas in the city. This comment has will be provided to the Planning Commission and City Council for consideration in the decision-making process.

Response to Comment PH5-3
The San Luis Obispo Parks and Recreation Element and Master Plan (2001) include a park standard that requires the City to develop and maintain 10 acres of parkland per 1,000 residents. The adopted standard does not include park demand or use by daytime workers, therefore, the Draft EIR did not attempt to quantify park use by daytime workers, nor was such an analysis required. This comment has will be provided to the Planning Commission and City Council for consideration in the decision-making process.

Response to Comment PH5-4
This comment provides suggestions for the revision of or edits to the proposed LUCE Update as it relates to negotiating recreation joint use agreements. Although the information provided by this comment does not pertain to the adequacy of the environmental impact analysis provided by the Draft EIR, the comment has been noted in Appendix of the Final EIR and will be provided to the Planning Commission and City Council for consideration in the decision-making process.

Please also refer to Master Response #1, Comments Specific to the LUCE Update Concepts and/or Policies.

Response to Comment PH5-5
This comment provides suggestions for the revision of or edits to the proposed LUCE Update as it relates to the ongoing maintenance of city parks. Although the information provided by this comment does not pertain to the adequacy of the environmental impact analysis provided by the Draft EIR, the comment has been noted in Appendix of the Final EIR and will be provided to the Planning Commission and City Council for consideration in the decision-making process.

Please also refer to Master Response #1, Comments Specific to the LUCE Update Concepts and/or Policies.
CALL TO ORDER:

Chairperson Elizabeth Thyne called the meeting to order at 2:35 p.m.

ROLL CALL

Present: Elizabeth Thyne, James Thompson, Todd Katz, Sara Sanders, Randol White, and Dominique Bonino

Absent: Jody Frey and Anthony Pinkerton

Staff: Gamaliel Anguiano, Peggy Mandeville and Jake Hudson

OATH:

Anthony Mejia, City Clerk, swore in returning Committee members Elizabeth Thyne and Louise Justice.

PUBLIC COMMENTS

Eliane Guillot, San Luis Obispo Council of Governments (SLOCOG), asked to make a presentation at the next MTC meeting on the Transit Performance Audit.

MINUTES

Approval of March 12, 2014 Regular Meeting Minutes

Sara Sanders moved to approve the minutes as submitted. Todd Katz seconded the motion. The motion passed unanimously.

ACTION ITEMS
Agenda Item # 1: Officer Elections

ACTION:

Ms. Thyne nominated Ms. Justice as Chair. Mr. White seconded the motion. The motion passed unanimously.

Ms. Justice nominated Mr. Katz as Vice Chair. Ms. Thyne seconded the motion. The motion passed unanimously.

Agenda Item # 2: Setting of Meeting Schedule

Mr. White requested that the regular meeting start time be switched to 1 p.m. It was determined that the hearing room would be available at that time.

The Committee agreed to revise the meeting start time to 1 p.m.

DISCUSSION ITEMS

Agenda Item # 3: Smoking at Bus Shelters and Transit Center

Mr. Anguiano discussed the issue of on site smoking and noted the ordinance banned smoking in public places and that contract employees are not allowed to smoke on duty. He reported that police officer Brent Inglehart sent a letter to staff, reminding them of the ordinance.

There was general Committee discussion on the ordinance and its enforcement.

Agenda Item # 4A: Land Use and Circulation Element (LUCE) Update

Ms. Mandeville discussed the project’s draft environmental impact report (EIR) and requested that Committee members provide comments pertaining to the EIR.

Mr. Hudson discussed transportation forecasts, trip generation, trip distribution; mode choice; route choice; traffic flows; targeted travel and mode predictions. He noted that the Council had supported a significant increase in bicycle mode share, so there was an expectation that bicycle usage will increase more than any other mode. He identified intersections that would require some form of intersection control such as signalization or roundabout.

Ms. Mandeville discussed the LOVR interchange construction would start in October 2014.
Ms. Thyne noted that it is very difficult to circulate through the roundabouts in Boston. She requested a clarification on Policy 3.1.5 Transit Service Evaluation.

There was general Committee/staff discussion on roundabouts.

Ms. Mandeville noted the Transit Service Evaluation Policy represents a good business practice of evaluating the services we provide.

Ms. Justice was concerned with congestion near a future City/County transit center if upper Higuera Street is converted to a two-way street. She asked about the EIR Class 3 designations.

Mr. Hudson explained that the designations were on a conceptual level.

The Committee discussed the Regional Transit Center Policy 3.1.7 and the idea of asking Council to consider the possible impacts on a centralized transit center development if Higuera is converted to a two-way street.

Mr. Katz distributed a draft proposal regarding creating a citizen-based multi-modal transit committee with a charter to focus on current and future multi-modal transportation issues affecting San Luis Obispo residents and visitors.

Mr. Hudson noted that Public Works was working on a department strategic plan and the plan considers consolidating various advisory bodies.

Mr. Hudson outlined 2035 Corridor traffic, intersection, and multi-modal conditions, stating there will be a need for new transit services to augment existing routes. Staff is proposing the EIR not recommend corridor widening and instead improve transit service, bicycling and pedestrian circulation to address congestion.

Ms. Mandeville discussed multi-level modal level of service regarding transit, e.g. better headways.

Public Comment:

Eliane Guillot, SLOCOG, asked what assumptions were made for Cal Poly noting that the university is embarking on an update to their master plan.

Mr. Hudson explained the EIR used Cal Poly’s approved master plan which is based on students and faculty/staff data projections.

Geoff Straw, San Luis Obispo Regional Transit Authority (RTA), noted that roundabouts in Davis work very well. Additionally, he thinks converting upper Marsh and Higuera to two-way streets will improve transit circulation. Mr. Straw recommended the following wording changes to policies:
Policy 3.0.3: Delete “provided”.
Policy 3.0.4: Delete reference to “free”.
Policy 3.1.4: Delete “cost effectiveness of consolidated service” and replace with “benefits and drawbacks of coordinated and consolidated service”.

Eric Meyer, LUCE Task Force Chair, liked Mr. Katz idea to consider forming a committee that would oversee multi-modal transportation issues and projects.

The public comment period was closed. No EIR related comments were submitted by the public or the Committee.

Ms. Mandeville noted that July 28, 2014 was the deadline for comments.

**ACTION:**

Mr. Katz moved to request that Council consider evaluating the merits of creating a citizen-based multi-modal transit committee with a charter to focus on current and future multi-modal transportation issues affecting San Luis Obispo residents and visitors. Mr. Thompson seconded the motion. The motion passed unanimously.

---

**Agenda Item # 4B: Transit Manager’s Report**

Mr. Anguiano reported that a ridership count of 1.1 million and noted that there was an increase in student pass usage and Cal Poly passes. He also noted that Wi-Fi was being utilized and that the double-decker bus would be at the July 13 Laguna Lake Car Show.

He also reported that the city was partnering with the Max Cure Foundation in a trial weeklong promotion: for every pair of sneakers that were donated, that donor would get a free one-day pass.
Whereas this is a time of rapid change in residents' definition of public and private transportation, including development of many new types of shared transportation vehicles. Examples of such changes include:

* automobile sharing
* hourly auto and truck rental
* private livery services (i.e. Uber)
* driverless cars
* skateboard-type vehicles, electric and otherwise
* temporary transport of one type of vehicle via another
* high-powered personal vehicles (including for the disabled)
* increasing numbers of motorcycles, and scooters, and mopeds
* racks of shared rental bikes

Between now and 2035 even more examples of the above will undoubtedly become commonplace.

The Mass Transportation Committee (MTC) respectfully draws the attention of the City Council to its previous recommendation to the LUCE Committee that a citizen-based multi-modal transit committee be created whose charter would be to focus on current and future multi-modal transportation issues facing the city, its residents and its visitors.

The MTC recognizes that the Planning Commission (PC) handles transportation infrastructure-related issues. However, because of the PCs many other weighty responsibilities, the MTC believes that it would be clearer to San Luis Obispo residents if there were a citizen-based committee associated with the Public Works department that was specifically dedicated to current and future multi-modal transportation issues affecting San Luis Obispo.

Specifically, we respectfully request the support of the Council members assigned to this Committee in this endeavor and their help in moving this initiative forward to the entire Council.
Response to Comment PH6-1

The commenter provides suggestions for the revision of or edits to the proposed LUCE Update as it relates to policies 3.0.3 and 3.0.4 and to program 3.1.4. The text edits have been incorporated into the LUCE Update as follows:

Policy 3.0.3: Paratransit. The City shall continue to support paratransit service for the elderly and handicapped should continue to be provided for seniors and persons with disabilities by public and private organizations.

Policy 3.0.4: The City should continue to work with Cal Poly to maintain and expand the “no-fare subsidy program” for campus service and Cal Poly should continue to provide financial support affiliates. The City should work with Cuesta College and other agencies to establish similar programs.

Policy 3.1.4: The City will cooperate with efforts of the San Luis Obispo Council of Governments (SLOCOG)–Regional Transit Authority (SLORTA) to evaluate the benefits and drawbacks of consolidated effectiveness of centralizing transit service.

Please also refer to Master Response #1, Comments Specific to the LUCE Update Concepts and/or Policies.

Response to Comment PH6-2

This comment provides suggestions for the revision of or edits to the proposed LUCE Update as it relates to the creation of a citizen based multi-modal transit committee. Although the information provided by this comment does not pertain to the adequacy of the environmental impact analysis provided by the Draft EIR, the comment has been noted in Appendix of the Final EIR and will be provided to the Planning Commission and City Council for consideration in the decision-making process.

Please also refer to Master Response #1, Comments Specific to the LUCE Update Concepts and/or Policies.
3.0 MINOR EDITS TO DRAFT PROGRAM EIR
Minor Edits to Draft Program EIR

The following represents changes proposed to the City of San Luis Obispo Land Use and Circulation Elements Update (LUCE Update) Draft Program Environmental Impact Report (Draft EIR). The minor edits / clarifications listed in this chapter are the result of public comments or represent minor edits identified by City staff since publication of the Draft EIR. After careful consideration of the minor edits presented in this chapter, City staff has concluded that none of the edits constitutes “significant new information” within the meaning of Public Resources Code Section 21092.1 and CEQA Guidelines Section 15088.5. For this reason, the City need not “recirculate” for additional public comment either a full or a partial revision to the Draft EIR and the preparation of a Final EIR is appropriate.

In this chapter, proposed edits are listed in order by volume, appendix, and page number. The volumes and appendices that made up the Draft EIR are as follows. It should be noted that not every volume contains proposed edits.

**Volume I. Draft Program EIR**

**Volume II. Elements and Plans**
- Appendix A Draft Land Use Element
- Appendix B Draft Circulation Element
- Appendix C Draft South Broad Street Area Plan

**Volume III. Background Report**
- Appendix D Background Report

**Volume IV. EIR Technical Studies**
- Appendix E NOP and Responses
- Appendix F Airport Land Use Compatibility Report
- Appendix G Air Quality Modeling
- Appendix H Greenhouse Gases
- Appendix I Water Supply Assessment
- Appendix J Noise Modeling

**Volume V. Circulation Assessment**
- Appendix K Existing Condition Worksheets
- Appendix L Proposed Project Worksheets
- Appendix M LOS Graphics
- Appendix N Sensitivity Analysis

In this chapter, changes that resulted from responses to public comments on the Draft EIR are marked with a blue square (■). Changes that resulted from proposed edits by City staff or the Consulting Team are marked with a blue asterisk (★).
3.1 Edits in Volume I, Draft EIR

Note to Reader: Changes to the draft Land Use and Circulation Elements (policies, programs, and text) that arose from EIR comments and responses and are stated in Section 3.1 are incorporated by reference as changes to the Land Use and Circulation Elements as well.

Global Change in the Draft EIR is revised as follows in the Final EIR  
“Buckley Road to Los Osos Valley Road Connections” is changed to “LOVR Bypass”.

The following revisions are incorporated into the Final EIR  
“Acknowledgements” in the Final EIR and Background Report are revised as follows

- John Asbaugh

Page ES-4 in the Draft EIR is revised as follows in the Final EIR  
As part of the LUCE Update, a comprehensive list of circulation improvements to be considered (called the “project description”) was reviewed and approved for further analysis by the City Council. This list also included variations of those improvements. Appendix N provides the sensitivity analysis performed on those individual variations. The results of this sensitivity analysis were then used by the City to determine which variations would be included as part of the Proposed Project presented in the EIR. From this analysis, the City identified 17 circulation improvements to include in the Proposed Project. These are listed on the following table. The table below lists the 17 proposed “physical alternative” street network modifications identified by the Circulation Element Update public participation and Element preparation process.

The following revisions are incorporated into the Final EIR  
Both tables have a source added.

Source: Matrix Design Group, 2014; Mintier Harnish, 2014

Page ES-6 in the Draft EIR is revised as follows in the Final EIR  
Figure ES-1 has been added on page ES-6 showing land use option sites. The new figure is included at the end of this chapter.

Also on this page, the reference to Table ES-1, in Section ES-1.3 on page ES-6, has been corrected in the Final EIR as follows.

Table EXES-1

Page ES-7 in the Draft EIR is revised as follows in the Final EIR  
The Maximum Circulation Improvements Alternative would provide three street system modifications not included in the proposed Circulation Element Update impact analysis. This alternative would generally result in environmental impacts that are similar to the proposed Project, but would have fewer air quality, greenhouse gas emission, and traffic impacts due to more free-flowing traffic circulation conditions. This alternative would also have the potential to result in increased cultural resource and noise impacts along portions of one of the alternative roadway system projects; however, it is likely that those impacts could be reduced to a less than significant level with the implementation of appropriate design and other mitigation measures. The Maximum Circulation Improvements Alternative would result in substantial and area-wide environmental benefits and would not impede the implementation of proposed Land Use and Circulation Element Update objectives. As stipulated under CEQA Guidelines §§15126.6(e), an EIR must evaluate the environmental effects of project (or plan) alternatives, compare these effects to those of the proposed project, and identify the environmentally superior
alternative. Based on the reasons discussed above, Therefore, the Maximum Circulation Improvements Alternative would be the environmentally superior alternative to the proposed project that fulfills the basic objectives of the proposed LUCE Update.

**Page ES-11 in the Draft EIR is revised as follows in the Final EIR**

As future development under the LUCE Update is proposed, the City will be required to ensure consistency with the General Plan and the policies/programs listed above. However, with the incorporation of the Proposed Project, adherence to proposed and existing City policies and programs discussed above, and continued support of Caltrans’ and SLOCOG’s and SLORTA’s efforts to address demand on US 101 in the vicinity of San Luis Obispo, these mitigation measures would not mitigate the impacts and widening to 6 lanes is not feasible.

**Page 1-3 in the Draft EIR is revised as follows in the Final EIR**

- Pedestrian Circulation Plan: The LUCE Update includes the development of a draft Pedestrian Circulation Plan for the Downtown as part of the Circulation Element update. The draft Pedestrian Circulation Plan has not been fully developed or presented for advisory bodies and public review, and it is not evaluated as part of this EIR.

**Page 1-6 in the Draft EIR is revised as follows in the Final EIR**

Although not Responsible Agencies under CEQA, several other agencies have review authority over aspects of the General Plan or approval authority over projects that could potentially be implemented in accordance with various General Plan objectives and policies. These agencies and their roles are listed below.

- The California Department of Transportation (Caltrans) has responsibility for approving future improvements to the state highway system, including Highway 1, US 101, and State Route 226227.

**Chapter 2 in the Draft EIR is revised as follows in the Final EIR**

Request for a table showing Plan Buildout compared to Projected 2035 growth. The City will revise the Draft EIR to include a new table and discussion for this comparison

*Changes to text:*

The SLOCOG Regional Growth Forecast projects a demand for 4,271 people, 2,429 housing units, and 9,400 jobs between 2010 and 2035. Assuming 550 non-residential square feet per job, there is a demand for 5,170,000 square feet of non-residential floor area between 2010 and 2035. Potential future development in the Land Use Element Planning Subarea as envisioned by the proposed Land Use Element Update could result in approximately 4,904 additional dwelling units, 11,229 people, 11,346 jobs, and 5,081,708 non-residential square feet. The total future development capacity under the proposed Land Use Element exceeds the projected demand in population, housing units, and employment. It can accommodate over 98 percent of projected demand for non-residential square footage.

<table>
<thead>
<tr>
<th>Table 2.4-5</th>
<th>Comparison of SLOCOG Projections and Total Future Development Capacity, 2010-2035</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>SLOCOG Regional Growth Forecast</td>
</tr>
<tr>
<td>Population</td>
<td>4,271</td>
</tr>
<tr>
<td>Housing Units</td>
<td>2,429</td>
</tr>
<tr>
<td>Employment</td>
<td>9,400</td>
</tr>
<tr>
<td>Non-Residential Square</td>
<td>5,170,000</td>
</tr>
</tbody>
</table>

*See Table 2.3-4.*

*See Table 2.4-3*

*3 SLOCOG forecast population is based on 1.75 persons/household. Future development population is based on 2010 Census 2.2 persons/household.*

*4* Estimated using 550 non-residential square feet per job

*Source:* SLOCOG, SLO County 2040 Population, Housing, and Employment Forecast (2011)
Future Development Capacity from Existing Specific Plans, Planned Projects, and Other Vacant Land. Table 2.3-3 summarizes possible future housing unit, population, non-residential square footage, and employment capacity in the Planning Subarea that may occur under existing conditions. The table describes existing potential development capacity from previously approved specific plans, previously approved or planned projects, and other vacant land.

Specific Plans. There are three key specific plans that provide future development capacity within the Planning Subarea: The Margarita Area Specific Plan, the Airport Area Specific Plan, and the Orcutt Area Specific Plan. Assuming full buildout, the three specific plan areas could provide up to \(2,771,832,584,666\) total square feet of new non-residential floor area, 5,040,128,820 jobs, and 1,847 new housing units.

Planned Projects. Planned projects include developments with approved land use entitlements, preparing for building permits, in plan check, or under construction. There are eight planned and approved projects that would result in an estimated 289 new housing units and 88,000 square feet of non-residential floor area.

Vacant Land. Vacant land indicates what could realistically be developed on remaining undeveloped or underdeveloped land in San Luis Obispo based on actual constraints and historical development practice. Table 2.3-3 shows the breakdown of vacant and underutilized land by land use designations in 2012, excluding approved projects or vacant land in specific plan areas. Overall, the city has only 336 acres of vacant land, which makes up about 2.6 percent of the Planning Subarea. Altogether, about 36 percent of vacant and underutilized land is designated for residential development, 37 percent is designated for commercial and industrial development, and 24 percent is designated as open space. Services and Manufacturing and Low Density Residential areas have the greatest number of vacant, developable acres. All vacant and underutilized land potential is within the Planning Subarea.

Based on allowed density, anticipated infrastructure, and development history, vacant land in San Luis Obispo could support an additional 452 dwelling units and 1,036 people; and approximately 230,433 square feet of non-residential development and 419 employees.

SLOCOG Housing, Population, and Employment Projections. In 2011 the San Luis Obispo Council of Governments (SLOCOG) projected population, housing, and employment for jurisdictions in San Luis Obispo County through 2035. The following tables provide a summary of the SLOCOG forecast which were developed prior to 2010 census data being available. As shown in the Table 2.3-4, SLOCOG developed low, medium, and high projections for population, housing units, and employment. The demand assumptions use the mid estimates for anticipated demand for population, housing units, and employment, and the low estimates for anticipated demand for population and housing based on revised projections adopted by the SLOCOG Board adopted in April 2014. For population, 1,182 units were added to 2010, 2020, and 2035 in order to account for group quarters population.

The city of San Luis Obispo population in 2010 was estimated to be 43,937,451. The population is anticipated to increase to 45,969,471 by 2020 and 48,550,493 by 2035. This means the city will add an additional 4,613,271 people (10.9 percent) between 2010 and 2035. SLOCOG estimates that the city of San Luis Obispo had 20,553 housing units in 2010. The number of housing units in the city is anticipated to increase to 21,526,215 by 2020 and 23,204,229 by 2035. This means the city will add an additional 2,651,429 housing units (13.12 percent) between 2010 and 2035, including 1,060,972 single family and 1,591,457 multifamily units. The city of San Luis Obispo had 33,000 jobs in 2010. Employment is anticipated to increase to 36,900 jobs by 2020 and 42,400 jobs by 2035; an increase of 9,400 jobs (30 percent) between 2010 and 2035. The city of San Luis Obispo had a total of 18,150,000 square feet of non-residential development in 2010, an estimate based on the number of jobs in San Luis Obispo in 2010. Non-residential development is anticipated to increase to 20,295,000 square feet by 2020 and 23,320,000 square feet by 2035. This means the city will add an additional 5,170,000 square feet by 2035.
## Table 2.3-3  Capacity from Specific Plans, Planned Projects, and Other Vacant Land within Planning Subarea, San Luis Obispo 2012

<table>
<thead>
<tr>
<th></th>
<th>Acres</th>
<th>Typical Density</th>
<th>Capacity</th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Residential(^1) (Units/Acre)</td>
<td>Non-Residential (FAR)(^2)</td>
<td>Units(^3)</td>
<td>Population(^4)</td>
<td>Non-Residential Square Footage(^5)</td>
<td>Employment(^6)</td>
</tr>
<tr>
<td><strong>Specific Plans(^7)</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Margarita Area Specific Plan</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>868</td>
<td>1,988</td>
<td>969,017</td>
<td>3,215</td>
</tr>
<tr>
<td>Airport Area Specific Plan</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>0</td>
<td>-</td>
<td>1,791,815</td>
<td>3,640,349</td>
</tr>
<tr>
<td>Orcutt Area Specific Plan</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>979</td>
<td>2,242</td>
<td>11,000</td>
<td>20</td>
</tr>
<tr>
<td><strong>Subtotal</strong></td>
<td></td>
<td></td>
<td></td>
<td>1,847</td>
<td>4,230</td>
<td>2,771,832</td>
<td>6,778</td>
</tr>
<tr>
<td><strong>Planned and Approved Projects(^8)</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Chinatown Project</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>32</td>
<td>73</td>
<td>46,000</td>
<td>124</td>
</tr>
<tr>
<td>Pacific Courtyards</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>12</td>
<td>27</td>
<td>10,000</td>
<td>33</td>
</tr>
<tr>
<td>Mission Estates</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>10</td>
<td>23</td>
<td>N/A</td>
<td>0</td>
</tr>
<tr>
<td>Four Creeks (Creekston and Laurel Creek)</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>166</td>
<td>380</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Garden Street Terrace</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>8</td>
<td>18</td>
<td>25,000</td>
<td>83</td>
</tr>
<tr>
<td>313 South Street Apartments</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>43</td>
<td>98</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Marsh Street Commons</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>11</td>
<td>25</td>
<td>3,000</td>
<td>5</td>
</tr>
<tr>
<td>ICON project (1340 Taft)</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>7</td>
<td>16</td>
<td>4,000</td>
<td>7</td>
</tr>
<tr>
<td><strong>Subtotal</strong></td>
<td></td>
<td></td>
<td></td>
<td>289</td>
<td>660</td>
<td>88,000</td>
<td>252</td>
</tr>
<tr>
<td><strong>Other Vacant Land (by General Pan Designation)</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Suburban Residential(^4)</td>
<td>4.0</td>
<td>1</td>
<td>N/A</td>
<td>4</td>
<td>9</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Low Density Residential</td>
<td>53.4</td>
<td>6</td>
<td>N/A</td>
<td>320</td>
<td>733</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Medium Density Residential</td>
<td>7.1</td>
<td>10</td>
<td>N/A</td>
<td>71</td>
<td>163</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Medium-High Density Residential</td>
<td>0.4</td>
<td>16</td>
<td>N/A</td>
<td>6</td>
<td>14</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>High Density Residential</td>
<td>2.7</td>
<td>19</td>
<td>N/A</td>
<td>51</td>
<td>117</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Neighborhood Commercial(^5)</td>
<td>0.2</td>
<td>N/A</td>
<td>0.30</td>
<td>0</td>
<td>0</td>
<td>2,614</td>
<td>5</td>
</tr>
<tr>
<td>Community Commercial(^5)</td>
<td>3.2</td>
<td>N/A</td>
<td>0.30</td>
<td>0</td>
<td>0</td>
<td>41,818</td>
<td>76</td>
</tr>
<tr>
<td>Tourist Commercial(^5)</td>
<td>1.0</td>
<td>N/A</td>
<td>0.35</td>
<td>0</td>
<td>0</td>
<td>15,246</td>
<td>28</td>
</tr>
<tr>
<td>Office(^4)</td>
<td>1.3</td>
<td>N/A</td>
<td>0.35</td>
<td>0</td>
<td>0</td>
<td>19,820</td>
<td>66</td>
</tr>
<tr>
<td>Services and Manufacturing</td>
<td>13.3</td>
<td>N/A</td>
<td>0.25</td>
<td>0</td>
<td>0</td>
<td>144,837</td>
<td>193</td>
</tr>
<tr>
<td>Public</td>
<td>0.4</td>
<td>N/A</td>
<td>0.35</td>
<td>0</td>
<td>0</td>
<td>6,089</td>
<td>20</td>
</tr>
<tr>
<td><strong>Subtotal</strong></td>
<td>87</td>
<td>N/A</td>
<td>N/A</td>
<td>452</td>
<td>1,036</td>
<td>230,433</td>
<td>388</td>
</tr>
<tr>
<td><strong>Total Capacity in These Areas</strong></td>
<td></td>
<td></td>
<td></td>
<td>2,588</td>
<td>5,926</td>
<td>2,090,265</td>
<td>903,099</td>
</tr>
</tbody>
</table>

---

\(^1\) Units/Acre
\(^2\) FAR
\(^3\) Units
\(^4\) Population
\(^5\) Non-Residential Square Footage
\(^6\) Employment
\(^7\) Margarita Area Specific Plan
\(^8\) Planned and Approved Projects

Final EIR
Table 2.3.3. Notes:

1 Typical density is based on a net acre assumption accounting for necessary infrastructure and facilities (i.e., 90 percent for rural and suburban residential; 80 percent for low, medium, medium-high, and high density residential; 85 percent for residential neighborhood, general retail, neighborhood commercial, community commercial, tourist commercial, and office. To get the typical density, the maximum density was recalculated based on a development percent assumption on what is average for new development (i.e., 100 percent for rural residential; 60 percent for suburban and low density residential; 70 percent for medium density residential and residential neighborhood; 75 percent for general retail, neighborhood commercial, community commercial, tourist commercial, and office; 80 percent for high density residential and residential neighborhood).

2 Typical FAR is based on a net acre assumption accounting for necessary infrastructure and facilities (i.e., 85 percent). To get the typical FAR, the maximum FAR was recalculated based on a development percent assumption on what is average for new development (i.e., 60 percent general retail and 85 percent general retail downtown, 80 percent for public, 60 percent business park, 47 percent for services and manufacturing, 23 for office, 12.5 percent for neighborhood commercial and community commercial, 10 percent for tourist commercial).

3 Capacity is based on the net acre assumption multiplied by the typical net density.

4 Population for Specific Plan Area and Planned projects based on 2010 Census: 2.29 persons per household.

5 Non-residential square footage for specific plan area and planned projects is based on assumptions in specific plans and Community Development Project Status Report (December 31, 2012). Non-residential square footage for vacant land is based on the net acre assumption multiplied by the typical FAR.

6 For specific plans and planned projects, employment is estimated using 550 non-residential square feet per job. For vacant land, employment based on the following assumptions: 500 square feet per employee for general retail and community commercial, 550 square feet per employee for neighborhood, tourist commercial, and business park, 300 square feet per employee for office, 1,000 square feet per employee for services and manufacturing, 1,500 square feet per employee for public.

7 Non-Residential square footage includes land designated neighborhood commercial, services commercial, business park, and manufacturing.

8 Does not include projects that fall within the boundaries of the MASP, AASP, or OASP. Only those projects that provided specific unit/square footage numbers were included.

Sources: Community Development Department Project Status Report (December 31, 2012), San Luis Obispo General Plan, Land Use Element, 2010; City of San Luis Obispo, 2012; Mintier Harnish, 2012.
### Table 2.3-4 Estimated and Projected Housing Units

<table>
<thead>
<tr>
<th></th>
<th>2010</th>
<th>2020</th>
<th>2035</th>
<th>2010-2035</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Low (L)</td>
<td>Mid (M)</td>
<td>High (H)</td>
<td>Low (L)</td>
</tr>
<tr>
<td>Population</td>
<td>45,11943,</td>
<td>45,11943,</td>
<td>47,14645,</td>
<td>49,39048,</td>
</tr>
<tr>
<td></td>
<td>937</td>
<td>937</td>
<td>964</td>
<td>969</td>
</tr>
<tr>
<td>Housing Units</td>
<td>20,553</td>
<td>20,553</td>
<td>21,523</td>
<td>22,982</td>
</tr>
<tr>
<td></td>
<td>20,553</td>
<td>21,523</td>
<td>21,528</td>
<td>23,204</td>
</tr>
<tr>
<td>Employment</td>
<td>33,000</td>
<td>33,000</td>
<td>33,000</td>
<td>36,900</td>
</tr>
<tr>
<td>Non-Residential Development</td>
<td>18,150,00</td>
<td>20,295,00</td>
<td>23,320,00</td>
<td>5,170,00</td>
</tr>
<tr>
<td></td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

1,182 units are added to SLOCOG 2040 Regional Population Forecast to account for group quarters. Population is forecast at 1.75 persons/housing unit.

*Estimated using 550 non-residential square feet per job*

Source: SLO County 2040 Population, Housing, and Employment Forecast (2011)
Page 2-26 in the Draft EIR is revised as follows in the Final EIR

“Buckley Road to Los Osos Valley Road Connections” is changed to “LOVR Bypass”.

Reference to the Cal Poly Campus Master Plan on page 2-26 (top of page) will be edited in the FEIR as follows.

- Cal Fire/Cal Poly-Owned Property on Highway 1. *No potential land uses in this area have been identified. This site is included as part of the Cal Poly Campus Master Plan.*

Page 2-37 in the Draft EIR is revised as follows in the Final EIR

<table>
<thead>
<tr>
<th></th>
<th>Connections to Dalidio Dr. from Froom Ranch Way and/or Calle Joaquin</th>
</tr>
</thead>
<tbody>
<tr>
<td>16</td>
<td><em>Option removed from consideration due to low justification and potential impacts (not part of proposed project or EIR alternatives)</em></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th></th>
<th>Realign Vachel Ln.</th>
</tr>
</thead>
<tbody>
<tr>
<td>17</td>
<td><em>Option removed from consideration due to low justification and potential impacts (not part of proposed project or EIR alternatives)</em></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th></th>
<th>North-South Connection between Tank Farm Rd. and Buckley Rd.</th>
</tr>
</thead>
<tbody>
<tr>
<td>18</td>
<td>Consideration creating a north-south connection between Tank Farm and Buckley for future connectivity.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th></th>
<th>Buckeye Rd. to LOVR Connections LOVR Bypass</th>
</tr>
</thead>
<tbody>
<tr>
<td>19</td>
<td>Consider (Buckley to Higuera connection and Higuera to LOVR behind Los Verdes - 101 bypass.</td>
</tr>
</tbody>
</table>

Page 4-2 in the Draft EIR is revised as follows in the Final EIR

By its nature, a General Plan considers cumulative impacts insofar as it considers cumulative development that could occur within a city’s plan area. Therefore, the analysis of project impacts also constitutes the cumulative analysis. In addition to cumulative development within the Lompoc San Luis Obispo plan area, the analysis of traffic and related impacts (such as noise) considers the effects of regional traffic growth.

Page 4-8 in the Draft EIR is revised as follows in the Final EIR

Proposed Land Use Element Development Special Planning Areas

Foothill @ Santa Rosa Area: This part of the city supports views of the surrounding hillsides and natural open space. This portion of the city also serves as a gateway to the city urban core for southbound travelers along Highway 1. Future development has the potential to obstruct or block scenic views.

Caltrans Site: This area is located near the Marsh Street off-ramp on Highway 101, at the intersection of Higuera Street and Marsh Street. Future mixed use development in this area, as envisioned under the LUCE Update, would introduce new structures with the potential to result in human health and safety impacts during seismic events. This site is located at the southern city limit boundary along South Higuera Street and serves as a gateway into the city as the scenery transitions from the rural environment to the urbanized center of the city. Future development of this site has the potential to result in the extension of the urbanized city into the rural environment to the south. This could result in impacts related to the blocking or obstruction of scenic viewing areas;

Page 4-16 in the Draft EIR is revised as follows in the Final EIR

Proposed Land Use Element Development Areas

Foothill @ Santa Rosa: This part of the city and its surroundings support views of the adjacent hillsides and natural open space. This portion of the city also serves as a gateway to the city urban core for southbound travelers along Highway 1. Future development has the potential to degrade scenic views.

Caltrans Site: This area is located near the Marsh Street off-ramp on Highway 101, at the intersection of Higuera Street and Marsh Street. Future mixed use development in this area, as envisioned under the LUCE Update, would introduce
new structures with the potential to change the visual character of its surroundings. However, the surrounding area is already urbanized and the existing site is developed. Implementation of proposed LUCE update policies and existing Community Design Guidelines would reduce impacts to less than significant levels, to result in human health and safety impacts during seismic events; This site is located at the southern city limit boundary along South Higuera Street and serves as a gateway into the city as the scenery transitions from the rural environment to the urbanized center of the city. Future development of this site has the potential to result in the extension of the urbanized city into the rural environment to the south. This could result in impacts related to the degradation of scenic viewing areas;

Page 4-23 in the Draft EIR is revised as follows in the Final EIR

Paragraph under “Proposed LUCE Update Development Areas and Street Network Changes” is deleted as it duplicates information in the previous paragraph.

Proposed LUCE Update Development Areas and Street Network Changes

As shown in Section 2.0, Project Description (Tables 2.4-2 and 2.5-1, respectively), the proposed LUCE Update includes sixteen potential development areas (including the South Broad Street Special Planning Area) and seventeen proposed street network changes. Although the proposed development area projects and street network changes listed below have the potential to result in significant impacts related to the introduction of new sources of light and glare, it is important to note that these projects have not been fully developed through the advanced planning process, at which time subsequent environmental review based on precise project designs will be performed. However, it is possible to provide a generalized environmental impact review appropriate for this programmatic EIR based on the details provided in Section 2.0, Project Description. For an overview of the development issues that apply to each of the special planning or development areas, please refer to Table 2.4-3 in the EIR Project Description.

Future implementation of the following proposed development area projects and street network changes would have the potential to result in significant impacts related to the introduction of new sources of light and glare.

Proposed Land Use Element Development Special Planning Areas

Foothill @ Santa Rosa Area: This part of the city and its surroundings support views of the adjacent hillsides and natural open space. This portion of the city also serves as a gateway to the city urban core for southbound travelers along Highway 1. Future development has the potential to introduce new sources of light and glare;

Caltrans Site: This site is located at the southern city limit boundary along South Higuera Street and serves as a gateway into the city as the scenery transitions from the rural environment to the urbanized center of the city. Future development of this site has the potential to result in the extension of the urbanized city into the rural environment to the south. This could result in impacts related to the introduction of new sources of light and glare;

Page 4-24 in the Draft EIR is revised as follows in the Final EIR

Victoria Avenue Connection to Emily Street heading should be underlined.

The following revisions are incorporated into the Final EIR

Pages 4-35 of the Draft EIR (Figure 4.2-3) and 6-22 of the Background Report (Figure 6.2-3) are revised as follows

The polygons outlining the Williamson Act properties now have a green fill color to help them standout on the figure. The updated figure is included at the end of this chapter.
Proposed Land Use Element Development Special Planning Areas

Sunset Drive-In Site: This site is located off of Elks Lane, just north of the Prado Road intersection, just outside of the urban core of the city. This area consists by commercial/industrial development, including the City Corporation Yard and the Prado Day Center, and is bound to the east by San Luis Obispo Creek. The area between the drive-in and San Luis Obispo Creek is currently in active agriculture production consisting of seasonal row crops. Mixed use development of this site as envisioned under the LUCE Update could potentially encroach into and conflict with neighboring agricultural uses;

Los Osos Valley Road Creekside Area: This area is located along west side of Los Osos Valley Road, near the Calle Joaquin intersection in the southwest portion of the city (south of the Home Depot development, north of the Johnson Ranch Open Space and east of Froom Ranch). This proposed development area is in active agriculture production consisting of seasonal row crops. Residential development on this site as envisioned under the LUCE Update would have the potential to result in increased conflicts with adjacent agricultural operations;

By 1875, 2,500 residents were documented in a 4-square mile area around what is now the City of San Luis Obispo. Population growth and advancements in technology continued to occur during this Industrial Era (1875-1900), and waterworks, hotels, livery stables, and a local paper—the Weekly Tribune, were established. Passenger and commercial liners and coaches kept population growth and movement progressively stable. The Monterey Street area had developed significantly by 1886, and Chinatown had become a bustling area of shops and restaurants by 1890. Construction on the extension of the Southern Pacific Railroad began in 1892 and was completed in 1894. The depot, roundhouse, and other facilities were completed by 1895. The first steam engine arrived in San Luis Obispo on May 5, 1894, finally linking the city to San Francisco. At the same time, the road from the south was underway, and on March 31, 1901 trains could finally run all the way from San Francisco to Los Angeles. The arrival of the railroad transformed the landscape of the city, shifting the city's economic center away from the historic core.

This period, from 1900-1945, is said to commence exponential rates of population growth for the area. By 1901, the City was served by the Pacific Coast Railway and mainline Southern Pacific (Krieger 1888), and in 1903-1901 the California Polytechnic State University was established, in 1903. The State Highway became drivable by 1915, leading to major booms in commercialization and urbanization of the area. The Motel Inn of San Luis Obispo was built in 1925, becoming the first motel to ever be built in the world.

San Luis Ranch Specific Plan Area

This 132 acre area is located in the southwest quarter of the city at the corner of Madonna Road and Dalidio Drive. The San Luis Ranch site is characterized primarily by its use as an agricultural property.

Potential development of the site, as outlined in the proposed LUCE Update, would convert the undeveloped land to residential and commercial uses. Due to the history of the area discussed under Impact CR-1 above, there is a potential for archaeological resources to be onsite. The potential archaeological and paleontological resource impacts related to development would be considered significant, however, compliance with state law and implementation of the LUCE Update policies such as 3.5 that requires protection of both known and potential archaeological sites, and 3.6.3 that requires the Cultural Heritage Committee and Architectural Review Commission to provide guidance on the construction of new buildings within historic districts, and for properties that contain potentially historic structures, and similar existing City policies discussed below would reduce impacts to a less than significant level.
2.0.3 Work-based Trip Reduction

Employers should participate in trip reduction programs. The City shall encourage employers within the city limits and work with the county to work with employers outside of the City limits to participate in trip reduction programs - including commuter benefit options to reduce the amount of commuters who drive alone in their vehicles.

Page 4-166 and 167 in the Draft EIR is revised as follows in the Final EIR

The following policies are added to Table 4.7-3 Consistency of Proposed LUCE Update Policies and Program with Climate Action Plan Measures and Actions. Both policies currently exist in this form in the Draft Circulation Element, and are just copied to this location as they related to the EIR.

6.0.1 Policy 6.0.A — Complete Streets

The City shall design and operate city streets to enable safe, comfortable, and convenient access and travel for all users of all abilities the transportation system - including pedestrians, bicyclists, transit users, and motorists of all ages and abilities.

6.0.2 Policy 6.0.B — Multimodal Level of Service (LOS) Objectives, Service Standards, and Significant Criteria

The City shall strive to achieve level of service objectives and shall maintain level of service minimums for all four modes of travel; Pedestrians, Bicyclists, Transit, & Vehicles per Table 26.0.1 and the Highway Capacity manual.

Page 4-237 in the Draft EIR is revised as follows in the Final EIR

The text on page 4-237 has been revised in the Final EIR as follows.

Sustainable Community Communities Strategy

Pages 4-239 and 240 of the Final EIR are revised as follows

City staff explanation on the changes proposed below.

The purpose of this memorandum is to document our determination that conflicts between the policies and programs contained in the LUCE Update and those contained in the ALUP should be characterized in the Final EIR as Class 3 (less than significant) rather than Class 1 (significant and unavoidable). This determination is based on substantial evidence contained in the record, including but not limited to the Draft EIR analysis and Airport Land Use Compatibility Report by Johnson Aviation, and lack of substantial evidence in the record to the contrary.

Having reviewed all comments received during the public review period for the Draft EIR and correspondence received from the Airport Land Use Commission (ALUC) in connection with the LUCE referral process, we have concluded that the policy consistency “impact” identified in the Draft EIR is merely a policy impact that does not have the potential for significant impacts on the physical environment. All development within the airport area would have to comply with the policies and programs of the LUCE Update and implementing zoning regulations, which satisfy the intent of the State Aeronautics Act and provide adequate protection relative to noise, safety and airport land use compatibility as evidenced in the airport compatibility study which was included as an appendix in the DEIR.
Section 15064 of the CEQA Guidelines provides guidance as to the determination of impact significance and includes the following:

“The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the public agency involved, based to the extent possible on scientific and factual data.” [Sec. 15064(b)]

“In evaluating the significance of the environmental effect of a project, the Lead Agency shall consider direct physical changes in the environment which may be caused by the project and reasonably foreseeable indirect physical changes in the environment which may be caused by the project.” [Sec. 15064(d)]

“A change which is speculative or unlikely to occur is not reasonably foreseeable.” [Sec. 15064(d)(3)]

“The decision as to whether a project may have one or more significant effects shall be based on substantial evidence in the record of the lead agency.” [Sec. 15064(f)]

“The existence of public controversy over the environmental effects of a project will not require preparation of an EIR if there is no substantial evidence before the agency that the project may have a significant effect on the environment. [Sec. 15064(f)]”

“Argument, speculation, unsubstantiated opinion or narrative, or evidence that is clearly inaccurate or erroneous, or evidence that is not credible, shall not constitute substantial evidence. Substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion support by facts. [Sec. 15064(f)]”

During preparation of the Draft EIR, a clear conflict was discovered between the land use restrictions in the currently adopted ALUP and the policies and programs being proposed in the LUCE Update. On that basis, and with the absence of information demonstrating the factual support for the ALUP safety zones and noise contours making the City’s analysis difficult, the City conservatively identified the impact as potentially Class I (significant and unavoidable). This was an exercise of caution pending the July 16, 2014 ALUP consistency hearing and pending any evidence that would potentially be added into the record during the public review period for the Draft EIR.

Comments were received from the ALUC and Caltrans Division of Aeronautics but no substantial evidence based on facts was presented to indicate that implementation of the LUCE policies and programs and implementing zoning regulations could have a significant impact on noise, safety, airport compatibility or any other component of the environment.

Further review and technical analysis demonstrates that, while the conflict remains on paper, it is only a paper conflict because:

a. The existing ALUP is admittedly outdated and non-compliant with statutory requirements that it be based on the Airport Master Plan.

b. The adopted plan zones and contours are not supported by the operations data in the adopted Airport Master Plan, FAA forecasts, technical compatibility analyses, or the Land Use Planning Handbook, nor do the adopted zones further the objectives of the State Aeronautics Act (SAA) based on any objective, verifiable data or standard.

c. The City has developed data-supported zones, contours and standards that do further the objectives of the SAA, while not unreasonably restricting compatible development.

In effect, on further review and in light of comments and information from Caltrans and the ALUC, there is no objective verifiable data supporting the adopted ALUP. Staff has therefore concluded that a paper or policy conflict with an objectively inaccurate and fundamentally flawed plan is not a significant impact under CEQA. Staff has further concluded that the changes in the policies and programs that would support increased development in certain areas have been adequately studied and there are no unidentified, unmitigated real environmental impacts of any of the City’s proposed actions in this arena.
b. Project Impacts

**Impact LU-1**

The proposed LUCE Update would **have the potential to** conflict with an applicable land the airport land use plan (ALUP) of an agency with jurisdiction over the project adopted for the purpose of avoiding or **mitigating an environmental effect**. **With However, with** the implementation of proposed LUCE Update policies and implementing zoning regulations, potential land use conflicts impacts are considered to be a Class I Less than significant and unavoidable impact.

---

**San Luis Obispo County Regional Airport Land Use Plan (ALUP)**

The ALUP contains a compatibility matrix which lists various land uses and assesses their compatibility with noise and safety concerns within defined zones. A significant adverse impact would occur if land uses described in the proposed Project are designated as “prohibited” by that matrix. If the ALUP identifies these uses as “Special Function”, “High Intensity”, subject to “Noise Mitigation”, or subject to limitations of density or intensity, a potentially significant impact would occur.

In addition to policy and program updates throughout the LUCE, the proposed Project includes particular updates that may be impacted by regulations in the ALUP; specifically, Chapter 7 (Airport) and Chapter 8 (Special Focus Areas) of the Land Use Element and Chapter 11 (Air Transportation) of the Circulation Element as well as implementation through updates to the Zoning Code to address safety, noise, overflight, and airspace obstructions associated with the San Luis Obispo County Regional Airport. These proposed changes supported by the Airport Compatibility Report show how the City will comply with the State Aeronautics Act, the Public Utilities Code, FAA regulations, the California Airport Land Use Planning Handbook, and local conditions through its General Plan update and implementation. **However, the proposed Project still has the potential to be found inconsistent with the existing ALUP by the Airport Land Use Commission. Although the LUCE Update conflicts with the ALUP, no While physical environmental impacts of-related to safety and or noise have not been identified for the LUCE update from existing or future airport operations as described in the adopted Airport Master Plan, development envisioned in the proposed Project presents a conflict with the ALUP.**

The ALUP identifies CNEL noise contours at 50, 55, and 60 dB to show areas subject to aircraft noise that may pose land use compatibility issues. The ALUP identifies all residential uses and some non-residential uses as extremely sensitive land uses that are prohibited in areas subject to airport noise of 60 dB CNEL or greater, and only allows infill (where surrounded by like development) of these uses in areas that are exposed to aircraft noise of 55-60 dB CNEL. Development supported by changes to the LUCE and implementation through the Zoning Code will result in development occurring within the 55 and 60 dB CNEL noise contours as shown in the ALUP. These contours were based on a hypothetical maximum use of the runways instead of the State-mandated use of the Airport Master Plan and its operations forecast.

The Airport Land Use Commission (ALUC) is currently in the process of updating the ALUP to reflect the adopted Airport Master Plan and to develop noise contours more consistent with state guidance. A draft plan has not yet been released for public review so it is too speculative to review potential changes to the updated LUCE against the potential changes to the updated ALUP. Hence, the discussion that follows discusses potential land use conflicts with the existing ALUP.

**While it The ALUC has yet to reviewed the proposed Project and has determined that it is inconsistent with the provide a consistency determination, the proposed LUCE Update would have the potential to conflict with an applicable land use plan – the ALUP – of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect. When reviewing the proposed Project, the ALUC may take one of three actions: Find the project consistent with the ALUP; Find the project inconsistent with the ALUP; or Recommend changes to the project that would enable a finding of consistency with the ALUP.**

If the ALUC finds the LUCE update to be inconsistent with the ALUP, or provides recommendations for changes to the LUCE update that would fundamentally change the development potential identified in the LUCE update, Subsequently, the City Council adopted a draft resolution will need to provide direction to make changes to the project or to determine that an indicating their intent to overrule the ALUC’s determination of inconsistency is appropriate. Since a major objective
of the proposed Project is to provide infill opportunities and encourage residential infill and densification, limiting development through consistency with the existing ALUP changes to the proposed Project does not appear to meet the project objectives. In the Draft Resolution, the City Council documents its findings that (a) the existing ALUP is flawed, outdated and inconsistent with state law and (b) the policies and programs in the LUCE Update are current, consistent with state law and provide adequate measures to protect existing and future airport operations and to protect public safety and noise exposure.

During preparation of the Draft EIR, a clear conflict was discovered between the land use restrictions in the currently adopted ALUP and the policies and programs being proposed in the LUCE Update. On that basis, and with the absence of information demonstrating the factual support for the ALUP safety zones and noise contours making the City’s analysis difficult, the City conservatively identified the impact as potentially Class I (significant and unavoidable). This was an exercise of caution pending the July 16, 2014 ALUP consistency hearing and pending any evidence that would potentially be added into the record during the public review period for the Draft EIR.

Having reviewed all comments received during the public review period for the Draft EIR and correspondence received from the Airport Land Use Commission (ALUC) in connection with the LUCE referral process, the City concludes that the policy consistency “impact” identified in the Draft EIR is merely a policy impact that does not have the potential for significant impacts on the physical environment. All development within the airport area would have to comply with the policies and programs of the LUCE Update and implementing zoning regulations, which satisfy the intent of the State Aeronautics Act and provide adequate protection relative to noise, safety and airport land use compatibility as evidenced in the airport compatibility study which was included as Appendix F in the DEIR. Comments were received from the ALUC and Caltrans Division of Aeronautics but no substantial evidence based on facts was presented to indicate that implementation of the LUCE policies and programs and implementing zoning regulations could have a significant impact on noise, safety, airport compatibility or any other component of the environment.

Further review and technical analysis demonstrates that, while the conflict remains on paper, it is only a paper conflict because: (a) the existing ALUP is admittedly outdated and non-compliant with statutory requirements that it be based on the Airport Master Plan; (b) the adopted plan zones and contours are not supported by the operations data in the adopted Airport Master Plan, FAA forecasts, technical compatibility analyses, or the Land Use Planning Handbook, nor do the adopted zones further the objectives of the State Aeronautics Act (SAA) based on any objective, verifiable data or standard; and (c) the City has developed data-supported zones, contours and standards that do further the objectives of the SAA, while not unreasonably restricting compatible development.

In effect, on further review and in light of comments and information from Caltrans and the ALUC, there is no objective verifiable data supporting the adopted ALUP. Staff has therefore concluded that a paper or policy conflict with an objectively inaccurate and fundamentally flawed plan is not a significant impact under CEQA. Staff has further concluded that the changes in the policies and programs that would support increased development in certain areas have been adequately studied and there are no unidentified, unmitigated real environmental impacts of any of the City’s proposed actions in this area.

Under the proposed Project, most new residential development potential exists in the three Specific Plan areas; San Luis Ranch, Avila Ranch, Madonna on LOVR; and in the South Broad Street Area Plan. Airport Land Use Plan limitations on residential development affect all of these areas. Residential uses in all of these areas are subject to density limitations in the Airport Land Use Plan. Each is discussed below in more detail.

Changes and development supported by the LUCE update and implementation through the Zoning Code are assumed to represent significant and unavoidable potential land use conflicts with the San Luis Obispo County Airport Land Use Plan.
Madonna on Los Osos Valley Road Specific Plan Area

This site includes approximately 111 acres and is located directly west of the intersection of Los Osos Valley Road and Calle Joaquin. The project site is open space and surrounding land uses include retail to the north and east, motels to the south, and open space to the west. Implementation of the Specific Plan is estimated to support approximately 115 dwelling units (although performance standards allow up to 350 residential units) and 336,170 square feet of non-residential uses.

The property falls mostly within Safety Zone 2 of the ALUP with a smaller portion close to Los Osos Valley Road located within the 1B (3 acres) and 1C (4 acres) Zones. Safety Zone 2, where the residential development is envisioned to occur on this property, allows 6-12 dwelling units per acre with an approved Airport Compatible Open Space (ACOS) plan. The City of San Luis Obispo does have an approved ACOS and additional density is allowed under certain circumstances (use of a detailed area plan and clustered development plan). The residential density envisioned for this area has the potential to be consistent with the ALUP.

The intensity of non-residential development supported under the ALUP is between 150-180 persons/acre in Safety Zone 2; and between 50-75 persons/acre in Safety Zone 1B/1C. There are approximately 7 acres of property within Safety Zone 1B/1C which would support the intensity associated with the approximately 30,000 sq. ft. of commercial uses envisioned in this area. The remaining development is proposed in Safety Zone 2 of the ALUP which appears to be consistent with the intensity allowed in this safety zone. Changes and development supported by the LUCE update and implementation through the Zoning Code would remove this property from airport-related density and intensity limitations, however, the development parameters for this property in the special focus area chapter of the LUCE has the potential to be consistent with the ALUP.

Potential impacts, however, are reduced to a less than significant level with the implementation of the existing and proposed LUCE policies identified below.

Avila Ranch Specific Plan Area

This site encompasses approximately 150 acres and is located on the north side of Buckley Road at the southern edge of the City. The project site is vacant and surrounding land uses include agriculture to the south, agriculture and the County-operated airport to the east, industrial uses to the north, and a mix of commercial and residential uses to the west. Implementation of the Avila Ranch Specific Plan would have the potential to result in the development of approximately 700 residential units and 25,000 square feet of non-residential uses.

The ALUP designates approximately 32 acres of the property in Safety Zone 1B, 25 acres of the property in Safety Zone 1C and 94 acres of the property in Safety Zone 2. The LUCE update contains performance standards to support an Airport Area Specific Plan (AASP) amendment to accommodate the development changes from Business Park to the residential development and associated non-residential uses described in the paragraph above. The AASP was found to be consistent with the ALUP and used intensity adjustments to cluster development and capture/relocate the unused development potential created by the large amount of open space associated with remediation of the Chevron property.

Changing the type of development in this area has the potential to be consistent with the ALUP noise, density and intensity standards. The 12 dwelling units of residential density allowed in Safety Zone 2 (the City has an approved ACOS plan) result in nearly 1,128 dwelling units allowed on the 115 acres of property. The performance standards associated with this area envision up to 700 dwelling units and up to 25,000 sq. ft. of non-residential space however it is spread over the larger 150 acre property, which would involve areas in Safety Zones 1B and 1C.

Portions of the site fall within the ALUP-identified 55 dB CNEL airport noise contour which would not support new residential development under Table 5.3 of the ALUP.

Changes and development supported by the LUCE update for this area and implementation through the Zoning Code have the potential to result in conflicts with the San Luis Obispo County Airport Land Use Plan.

These potential impacts, however, could feasibly be reduced to a less than significant level with the implementation of the existing and proposed LUCE policies identified below.
South Broad Street Special Planning Area

The South Broad Street area is located in the central portion of the city. Extensive planning-related work has been completed for the South Broad Street area, including the preparation of the Draft South Broad Street Area Plan, which was endorsed the City Council on September 17, 2013 for inclusion as part of the LUCE update. The South Broad Street Area Plan implements General Plan policies with three primary tools: a new land use vision, an emphasis on high-density infill housing and mixed-use, and form-based codes. Implementation of the Area Plan would have the potential to result in the development of approximately 589 residential units and 229,068 square feet of non-residential uses.

Land use conflicts that could have the potential to occur between the South Broad Street Area Plan and the Airport Land Use Plan include increased residential density. The southern 82 acres of the Area Plan is located in ALUP Safety Zone 2 which limits residential density to 12 units/acre. Since this is an area that is already subdivided and developed with a variety of uses, there is no opportunity to use the density and intensity adjustment factors in the ALUP (such as clustering development or providing a detailed area plan where density is limited for each parcel).

Changes and development supported by the LUCE update for this area and implementation through the Zoning Code have the potential to result in conflicts with the San Luis Obispo County Airport Land Use Plan. These potential impacts, however, could feasibly be reduced to a less than significant level with the implementation of the existing and proposed LUCE policies identified below.

Pages 4-256 through 4-258 of the Final EIR are revised to correct transcription error as follows (Table 4.11-1)

<table>
<thead>
<tr>
<th>Roadway Segment</th>
<th>Location</th>
<th>CNEL (dB) at 50 feet from Roadway Centerline</th>
<th>Distance (Feet from Roadway Centerline to CNEL dBA)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Highway 101</td>
<td>North of Los Osos Valley</td>
<td>81</td>
<td>662</td>
</tr>
<tr>
<td>Highway 101</td>
<td>South of Los Osos Valley</td>
<td>82</td>
<td>714</td>
</tr>
<tr>
<td>Highway 101</td>
<td>North of Madonna</td>
<td>82</td>
<td>757</td>
</tr>
<tr>
<td>Highway 101</td>
<td>South of Madonna</td>
<td>81</td>
<td>651</td>
</tr>
<tr>
<td>Highway 101</td>
<td>North of Route 227</td>
<td>81</td>
<td>703</td>
</tr>
<tr>
<td>Highway 101</td>
<td>South of Route 227</td>
<td>82</td>
<td>763</td>
</tr>
<tr>
<td>Highway 101</td>
<td>North of Route 1 N</td>
<td>81</td>
<td>666</td>
</tr>
<tr>
<td>Highway 101</td>
<td>South of Route 1 N</td>
<td>82</td>
<td>733</td>
</tr>
<tr>
<td>Highway 101</td>
<td>North of California</td>
<td>80</td>
<td>545</td>
</tr>
<tr>
<td>Highway 101</td>
<td>South of California</td>
<td>81</td>
<td>576</td>
</tr>
<tr>
<td>Highway 101</td>
<td>North of Grand</td>
<td>80</td>
<td>457</td>
</tr>
<tr>
<td>Highway 101</td>
<td>South of Grand</td>
<td>80</td>
<td>545</td>
</tr>
<tr>
<td>Highway 101</td>
<td>North of Buena Vista</td>
<td>80</td>
<td>488</td>
</tr>
<tr>
<td>Highway 101</td>
<td>South of Buena Vista</td>
<td>80</td>
<td>455</td>
</tr>
<tr>
<td>Highway 101</td>
<td>North of Northern City Limit</td>
<td>80</td>
<td>488</td>
</tr>
<tr>
<td>Highway 101</td>
<td>South of Northern City Limit</td>
<td>80</td>
<td>488</td>
</tr>
<tr>
<td>Augusta</td>
<td>Bishop to Laurel</td>
<td>56</td>
<td>2</td>
</tr>
<tr>
<td>Broad</td>
<td>S to South</td>
<td>67</td>
<td>24</td>
</tr>
<tr>
<td>Broad</td>
<td>Foothill to Lincoln</td>
<td>59</td>
<td>4</td>
</tr>
<tr>
<td>Broad</td>
<td>Monterey to Marsh</td>
<td>60</td>
<td>5</td>
</tr>
<tr>
<td>Broad</td>
<td>Marsh to Upham</td>
<td>66</td>
<td>21</td>
</tr>
<tr>
<td>Roadway Segment</td>
<td>Location</td>
<td>CNEL (dB) at 50 feet from Roadway Centerline</td>
<td>Distance (Feet from Roadway Centerline to CNEL dBA)</td>
</tr>
<tr>
<td>-----------------</td>
<td>----------</td>
<td>---------------------------------------------</td>
<td>-----------------------------------------------</td>
</tr>
<tr>
<td>Broad</td>
<td>Upham to South</td>
<td>68</td>
<td>30.51</td>
</tr>
<tr>
<td>Broad</td>
<td>South to Orcut</td>
<td>71</td>
<td>67.67</td>
</tr>
<tr>
<td>Broad</td>
<td>Orcut to Tank Farm</td>
<td>72</td>
<td>81.22</td>
</tr>
<tr>
<td>Broad</td>
<td>Tank Farm to Buckley</td>
<td>71</td>
<td>58.13</td>
</tr>
<tr>
<td>Broad</td>
<td>Buckley South</td>
<td>70</td>
<td>48.47</td>
</tr>
<tr>
<td>Buchon</td>
<td>High to Santa Rosa</td>
<td>53</td>
<td>1.25</td>
</tr>
<tr>
<td>Buchon</td>
<td>Santa Rosa to Johnson</td>
<td>58</td>
<td>3.41</td>
</tr>
<tr>
<td>California</td>
<td>Cal Poly to Foothill</td>
<td>64</td>
<td>14.20</td>
</tr>
<tr>
<td>California</td>
<td>Foothill to Taft</td>
<td>67</td>
<td>28.31</td>
</tr>
<tr>
<td>California</td>
<td>Taft to Monterey</td>
<td>65</td>
<td>17.63</td>
</tr>
<tr>
<td>California</td>
<td>Taft to San Luis</td>
<td>65</td>
<td>17.77</td>
</tr>
<tr>
<td>Capitolio</td>
<td>Broad to Sacramento</td>
<td>59</td>
<td>4.91</td>
</tr>
<tr>
<td>Chorro</td>
<td>Highland to Foothill</td>
<td>60</td>
<td>5.80</td>
</tr>
<tr>
<td>Chorro</td>
<td>Foothill to Lincoln</td>
<td>61</td>
<td>7.82</td>
</tr>
<tr>
<td>Chorro</td>
<td>Lincoln to Palm</td>
<td>60</td>
<td>5.62</td>
</tr>
<tr>
<td>Chorro</td>
<td>Palm to Pismo</td>
<td>60</td>
<td>5.73</td>
</tr>
<tr>
<td>Foothill</td>
<td>Los Osos Valley to Patricia</td>
<td>66</td>
<td>21.74</td>
</tr>
<tr>
<td>Foothill</td>
<td>Patricia to Broad</td>
<td>68</td>
<td>30.3</td>
</tr>
<tr>
<td>Foothill</td>
<td>Broad to Santa Rosa</td>
<td>69</td>
<td>39.11</td>
</tr>
<tr>
<td>Foothill</td>
<td>Santa Rosa to California</td>
<td>69</td>
<td>37.5</td>
</tr>
<tr>
<td>High</td>
<td>Higuera to Broad</td>
<td>56</td>
<td>2.2</td>
</tr>
<tr>
<td>Highland</td>
<td>Patricia to Ferrini</td>
<td>59</td>
<td>4.5</td>
</tr>
<tr>
<td>Highland</td>
<td>Ferrini to Cal Poly</td>
<td>66</td>
<td>22.12</td>
</tr>
<tr>
<td>Higuera</td>
<td>Johnson to Santa Rosa</td>
<td>63</td>
<td>9.41</td>
</tr>
<tr>
<td>Higuera</td>
<td>Santa Rose to Nipomo</td>
<td>67</td>
<td>24.2</td>
</tr>
<tr>
<td>Higuera</td>
<td>Nipomo to Marsh</td>
<td>67</td>
<td>28.1</td>
</tr>
<tr>
<td>Higuera</td>
<td>Marsh to South</td>
<td>69</td>
<td>37.80</td>
</tr>
<tr>
<td>Higuera</td>
<td>South to Madonna</td>
<td>72</td>
<td>81.43</td>
</tr>
<tr>
<td>Higuera</td>
<td>Madonna to Prado</td>
<td>70</td>
<td>46.37</td>
</tr>
<tr>
<td>Higuera</td>
<td>Prado to Tank Farm</td>
<td>70</td>
<td>51.42</td>
</tr>
<tr>
<td>Higuera</td>
<td>Tank Farm to Los Osos Valley</td>
<td>71</td>
<td>67.3</td>
</tr>
<tr>
<td>Higuera</td>
<td>Los Osos Valley to South of City Limits</td>
<td>66</td>
<td>22.4</td>
</tr>
<tr>
<td>Industrial</td>
<td>Broad to Sacramento</td>
<td>64</td>
<td>13.3</td>
</tr>
<tr>
<td>Johnson</td>
<td>Monterey to San Luis</td>
<td>65</td>
<td>17.15</td>
</tr>
<tr>
<td>Johnson</td>
<td>San Luis to Laurel</td>
<td>67</td>
<td>25.45</td>
</tr>
<tr>
<td>Johnson</td>
<td>Laurel to Orcut</td>
<td>63</td>
<td>11.5</td>
</tr>
<tr>
<td>Laurel</td>
<td>Johnson to Orcut</td>
<td>66</td>
<td>20.11</td>
</tr>
<tr>
<td>Los Osos Valley</td>
<td>West City Limits</td>
<td>68</td>
<td>31.4</td>
</tr>
<tr>
<td>Los Osos Valley</td>
<td>North City Limits to Prefumo Canyon</td>
<td>71</td>
<td>63.6</td>
</tr>
<tr>
<td>Los Osos Valley</td>
<td>Prefumo Canyon to Madonna</td>
<td>72</td>
<td>77.41</td>
</tr>
<tr>
<td>Roadway Segment</td>
<td>Location</td>
<td>CNEL (dB) at 50 feet from Roadway Centerline</td>
<td>Distance (Feet from Roadway Centerline to CNEL dBA)</td>
</tr>
<tr>
<td>----------------</td>
<td>----------</td>
<td>---------------------------------------------</td>
<td>--------------------------------------------------</td>
</tr>
<tr>
<td></td>
<td></td>
<td>70</td>
<td>65</td>
</tr>
<tr>
<td>Los Osos Valley</td>
<td>Madonna to Highway 101</td>
<td>73</td>
<td>91.24</td>
</tr>
<tr>
<td>Los Osos Valley</td>
<td>Highway 101 to Higuera</td>
<td>72</td>
<td>80.28</td>
</tr>
<tr>
<td>Los Osos Valley</td>
<td>Highway 101 to Higuera (S. Bypass Rd)</td>
<td>72</td>
<td>83.37</td>
</tr>
<tr>
<td>Madonna</td>
<td>Los Osos Valley to Oceanaire</td>
<td>71</td>
<td>62.81</td>
</tr>
<tr>
<td>Madonna</td>
<td>Oceanaire to Highway 101</td>
<td>72</td>
<td>73.46</td>
</tr>
<tr>
<td>Madonna</td>
<td>Highway 101 to Higuera</td>
<td>72</td>
<td>74.51</td>
</tr>
<tr>
<td>Margarita</td>
<td>E Higuera</td>
<td>58</td>
<td>3.67</td>
</tr>
<tr>
<td>Marsh</td>
<td>Higuera to Santa Rosa</td>
<td>64</td>
<td>11.22</td>
</tr>
<tr>
<td>Marsh</td>
<td>Santa Rosa to California</td>
<td>60</td>
<td>5.43</td>
</tr>
<tr>
<td>Mill</td>
<td>Grand to Chorro</td>
<td>55</td>
<td>2.47</td>
</tr>
<tr>
<td>Monterey</td>
<td>Chorro to Santa Rosa</td>
<td>60</td>
<td>5.25</td>
</tr>
<tr>
<td>Monterey</td>
<td>Santa Rosa to California</td>
<td>64</td>
<td>12.44</td>
</tr>
<tr>
<td>Monterey</td>
<td>California to Highway 101</td>
<td>64</td>
<td>11.20</td>
</tr>
<tr>
<td>Oceanaire</td>
<td>Los Osos Valley to Madonna (S. Lakeside)</td>
<td>56</td>
<td>2.24</td>
</tr>
<tr>
<td>Oceanaire</td>
<td>Los Osos Valley to Madonna (Southside)</td>
<td>51</td>
<td>1.63</td>
</tr>
<tr>
<td>Orcutt</td>
<td>Broad to Laurel</td>
<td>72</td>
<td>80.77</td>
</tr>
<tr>
<td>Orcutt</td>
<td>Laurel to Johnson</td>
<td>64</td>
<td>13.91</td>
</tr>
<tr>
<td>Orcutt</td>
<td>Johnson to Tank Farm</td>
<td>69</td>
<td>37.80</td>
</tr>
<tr>
<td>Orcutt</td>
<td>South City Limits</td>
<td>64</td>
<td>12.83</td>
</tr>
<tr>
<td>Palm</td>
<td>Chorro to Santa Rose (W Osos)</td>
<td>58</td>
<td>3.62</td>
</tr>
<tr>
<td>Pismo</td>
<td>Higuera to Santa Rosa</td>
<td>59</td>
<td>4.73</td>
</tr>
<tr>
<td>Pismo</td>
<td>Santa Rosa to Johnson</td>
<td>58</td>
<td>3.74</td>
</tr>
<tr>
<td>Prado</td>
<td>Madonna to Highway 101</td>
<td>65</td>
<td>15.3</td>
</tr>
<tr>
<td>Prado</td>
<td>Highway 101 to Higuera</td>
<td>65</td>
<td>15.41</td>
</tr>
<tr>
<td>Prado</td>
<td>Higuera to Broad</td>
<td>60</td>
<td>5.5</td>
</tr>
<tr>
<td>Prefumo</td>
<td>Los Osos Valley to CL (W LOVR)</td>
<td>63</td>
<td>11.2</td>
</tr>
<tr>
<td>Ramona</td>
<td>Patricia to Broad (W Broad)</td>
<td>59</td>
<td>4.5</td>
</tr>
<tr>
<td>Sacramento</td>
<td>Orcutt to Industrial</td>
<td>61</td>
<td>6.42</td>
</tr>
<tr>
<td>San Luis</td>
<td>California to Johnson</td>
<td>63</td>
<td>11.44</td>
</tr>
</tbody>
</table>
The following revisions are incorporated into the Final EIR  

Pages 4-283 of the Draft EIR (text and table) and Page 2-12 (Table 2.1-3) of the Background Report are revised as follows  

As part of its regional planning functions, the San Luis Obispo Council of Governments (SLOCOG) develops and publishes regional population and housing forecasts for the County and its communities. Based largely on information provided by the City, projections prepared by SLOCOG in 2011 indicate that the City will have a population increase of 4,271 people between 2010 and 2035 (Table 4.12-2).  

Table 4.12-2 Existing and Projected Household Population, City of San Luis Obispo  

<table>
<thead>
<tr>
<th>Year</th>
<th>Low</th>
<th>Mid</th>
<th>High</th>
<th>Change between 2010 and 2035</th>
</tr>
</thead>
<tbody>
<tr>
<td>2010</td>
<td>43,93745,119</td>
<td>43,93745,119</td>
<td>43,93745,119</td>
<td></td>
</tr>
<tr>
<td>2020</td>
<td>45,96447,149</td>
<td>45,96947,151</td>
<td>45,97247,154</td>
<td>4,271</td>
</tr>
<tr>
<td>2035</td>
<td>48,20849,390</td>
<td>48,55049,732</td>
<td>48,86050,042</td>
<td>4,613</td>
</tr>
</tbody>
</table>

Note: 1,182 units are added to SLOCOG 2040 Regional Population Forecast to account for group quarters  
Source: General Plan Background Report, 2014

Page 4-288 in the Draft EIR is revised as follows in the Final EIR  

Table 4.12-5 Existing and Projected Population and Dwelling Unit Characteristics, City and County of San Luis Obispo  

<table>
<thead>
<tr>
<th></th>
<th>Population</th>
<th>Dwelling Units</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>2010</td>
<td>2035</td>
</tr>
<tr>
<td>County of San Luis Obispo</td>
<td>269,637,252,631</td>
<td>315,363,315,363</td>
</tr>
<tr>
<td>City of San Luis Obispo</td>
<td>45,119,45,119</td>
<td>49,390,49,390</td>
</tr>
<tr>
<td>City Share of County-Wide Total</td>
<td>17%</td>
<td>16%</td>
</tr>
</tbody>
</table>

Note: 1,182 units are added to City projections and 17,006 are added to County projections to account for group quarters  
Sources: SLOCOG, 2011  

The following revisions are incorporated into the Final EIR  

Pages 4-320 of the Draft EIR (Figure 4.15-3) and 4-20 (Figure 4.2-1) of the Background Report are revised as follows  

The figure depicting the current City of San Luis Obispo Bicycle System has been updated based on current data provided by the City. Please see the updated Figure 4.15-3 located at the end of this chapter.

The following revisions are incorporated into the Final EIR  

Pages 4-322 of the Draft EIR (Figure 4.15-4) and 4-39 of the Background Report (Figure 4.4-1) are revised as follows  

The color difference between the Residential Arterial and Residential Collector were difficult to see as both were shown in a yellow color. Colors have been revised to make the lines originally presented easier to see. Please see the updated Figure 4.15-4 located at the end of this chapter.
Page 4-323 in the Draft EIR is revised as follows in the Final EIR

Figure 4.15-5 (located at the end of this chapter) was updated to extend the blue lines (Study Roadways) for:

- Tank Farm east to Orcutt Road and west to S. Higuera Street,
- South Street east to Broad Street,
- Palm Street east to Pepper Street, and
- Broad Street south to US 101 southbound ramps.

The following revisions are incorporated into the Final EIR

Pages 4-326 of the Final EIR and 4-48 and 4-49 of the Background Report are revised as follows

Draft EIR Table 4.15-2 (Local Roadway LOS) indicated that Prado Road would be a two lane road, and that typographical error has been revised as follows in the Final EIR.

<table>
<thead>
<tr>
<th>ID #</th>
<th>Location</th>
<th>Road Type</th>
<th>Lanes</th>
<th>Divided Roadway</th>
<th>Left Turn Lanes</th>
<th>Baseline</th>
</tr>
</thead>
<tbody>
<tr>
<td>79</td>
<td>Prado (Madonna – US 101)</td>
<td>Arterial</td>
<td>24</td>
<td>NOYES</td>
<td>YES</td>
<td>6,818</td>
</tr>
<tr>
<td>80</td>
<td>Prado (US 101 - Higuera)</td>
<td>Arterial</td>
<td>24</td>
<td>NOYES</td>
<td>YES</td>
<td>6,818</td>
</tr>
<tr>
<td>81</td>
<td>Prado (Higuera – Broad Street)</td>
<td>Regional Route</td>
<td>24</td>
<td>NOYES</td>
<td>YES</td>
<td>3,202</td>
</tr>
</tbody>
</table>

Page 4-328 in the Draft EIR is revised as follows in the Final EIR

d. Neighborhood Traffic Management

In June 1998, the City Council adopted a comprehensive Neighborhood Traffic Management (NTM) program aimed at reducing excessive traffic volumes and speeds on residential streets. The program offers different options to residents wanting to implement traffic calming measures on their streets. For large-scale problems, the program identifies the petition process and resources needed for developing an Action Plan. The Action Plan must have majority support of residential households before it can be considered by the City Council. The City Council can approve, deny, or request changes to the Action Plan.

Page 4-329 in the Draft EIR is revised as follows in the Final EIR

Caltrans is responsible for planning, designing, constructing, and maintaining all state-owned and -operated roadways in San Luis Obispo County, which in the case of this study does not include any nearby roads includes US 101, State Route 1 and State Route 227. Federal highway standards are implemented in California by Caltrans.
Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways;

- State Highway roadway segment operating at LOS D\textsuperscript{-}C or better but degrading to LOS E or F;
- Local roadway segment (not downtown) operating at LOS D or better, but degrading to LOS E or F or;
- Local roadway segment (downtown) operating at LOS E or better, but degrading to LOS F or;
- Local roadway segment is currently deficient, and project increases volume-to-capacity ratio by 0.01 or more;

Mode Choice Changes. The City’s 2013 Bicycle Transportation Plan (BTP) includes extensive new bicycle facilities throughout the City. These new facilities will increase bicycle demand by improving convenience, comfort, safety, and connectivity for cyclists. Planned new transit routes, service frequency changes, and route changes were included in the Year 2035 scenario of the TDM to reflect planned transit service level increases. Based on more progressive multi-modal policies proposed under the Proposed Project, the following mode split percentages (of total daily person trips) were assumed to be achieved by 2035 and were therefore incorporated into the Proposed Project’s mode split parameters:

<table>
<thead>
<tr>
<th></th>
<th>Total Trips</th>
<th>Home-Based-Work Trips</th>
<th>Home-Based-Work Plus</th>
<th>Home-Based-University Trips</th>
</tr>
</thead>
<tbody>
<tr>
<td>Drive Alone:</td>
<td>60.21%</td>
<td>79.6%</td>
<td></td>
<td>75.0%</td>
</tr>
<tr>
<td>Carpool:</td>
<td>30.49%</td>
<td>4.2%</td>
<td></td>
<td>5.7%</td>
</tr>
<tr>
<td>Transit:</td>
<td>1.00%</td>
<td>0.2%</td>
<td></td>
<td>2.0%</td>
</tr>
<tr>
<td>Walk:</td>
<td>4.15%</td>
<td>1.6%</td>
<td></td>
<td>1.9%</td>
</tr>
<tr>
<td>Bike:</td>
<td>4.15%</td>
<td>14.5%</td>
<td></td>
<td>15.5%</td>
</tr>
<tr>
<td>Total Person Trips:</td>
<td>1,165,948</td>
<td>215,091</td>
<td></td>
<td>255,267</td>
</tr>
</tbody>
</table>

Los Osos Valley Road (just west of the City Limits). Due to land use changes in the vicinity of the interchange \textit{city limit} and changes in traffic patterns, these segments will experience significant increases in volume.

Prado (US 101 – Higuera and Higuera – Broad). Due to the \textit{construction improvement} of the interchange at US 101/Prado Road, these segments will experience significant increases in volume.
The following revisions are incorporated into the Final EIR 🆗

Pages 4-341 of the Draft EIR and 23 and 38 of the Circulation Element are revised as follows:

The following policies were added in their entirety as additional “Applicable LUCE Update Policies”. As the policies contain proposed edits shown in strikeout/underline format, changes added to these policies are highlighted in yellow.

6.0.27.0.2 Street Network

The City shall manage to the extent feasible the street network so that the standards presented in Table 2 6.1 are not exceeded. This will require new development to mitigate the traffic impacts it causes or the City to limit development that affects streets where congestion levels may be exceeded. The standards may be met by strengthening alternative modes over the single occupant motor vehicle. Where feasible, roundabouts shall be the City’s preferred intersection control alternative due to the vehicle speed reduction, safety and operational benefits of roundabouts.

9.1.6 Streetscapes and major roadways

In the acquisition, design, construction or significant modification of major roadways (highways / regional routes and arterial streets), the City will shall promote the creation of “streetscapes” and linear scenic parkways or corridors that promote the City’s visual quality and character, enhance adjacent uses, and integrate roadways with surrounding districts. To accomplish this, the City will shall:

A. Establish streetscape design standards for major roadways;
B. Establish that, where feasible, roundabouts shall be the City’s preferred intersection control-design alternative due to improved aesthetics, the vehicle speed reduction, safety and operational benefits, reduction in impervious surface areas, and additional landscaping area;
C. Encourage the creation and maintenance median planters and widened roadway plantings;
D. Encourage the use of water-conserving landscaping, street furniture, decorative lighting and paving, arcaded walkways, public art, and other pedestrian-oriented features to enhance the streetscape appearance, comfort and safety.
E. Identify gateways into the City including improvements such as landscaped medians, wayfinding and welcoming signage, arches, lighting enhancements, pavement features, sidewalks, and different crosswalk paving types.
F. Encourage and where possible, required undergrounding of overhead utility lines and structures.
G. When possible, signs in the public right-of-way should be consolidated on a single, low-profile standard.
H. In the Downtown, streetscape improvements shall be consistent with the Downtown Pedestrian Plan.

Page 4-343 in the Draft EIR is revised as follows in the Final EIR 🆗

The commenter states that provision of additional buses could be a potential improvement for transit as mitigation for a significant impact. Subsection C of Policy 6.0.E has modified to incorporate this suggestion.

Transit: For transit-related impacts, developments shall be responsible for their fair share of any infrastructural improvements required. This may involve provision of street furniture at transit stops, transit shelters, and/or transit shelter amenities, pullouts for transit vehicles, transit signal prioritization, provision of additional transit vehicles, or exclusive transit lanes.
Future implementation of the proposed development area projects and street network changes would have the potential to result in significant impacts related to operations of key intersections. As shown in Table 4.15 Page 79, a total of 11 intersections would operate at unacceptable conditions during the AM and/or PM peak hours.

At this time, a six-lane widening of US 101 through the City of San Luis Obispo is not included in SLOCOG’s Regional Transportation Plan & Preliminary Sustainable Communities Strategy financially constrained Tier I list of improvements. The addition of traffic related to the implementation of the Proposed Project’s development area projects and street network changes is considered significant. Despite incorporation of the LUCE Update policies and existing City policies discussed below, freeway impacts would not be reduced to less than significant levels. Therefore, this impact is considered to be significant and unavoidable.

The City shall participate in and support regional multiagency efforts to mitigate congestion on Hwy 101 and associated regional funding initiatives where appropriate.

Localized projects that require discretionary approval and may substantially increase traffic on the US 101 corridor and/or ramps would be subject to project-specific environmental review consistent with the requirements of CEQA and City Policy 12.3.11, Environmental Review. If a proposed project were determined to have the potential to result in a significant impact, mitigation measures would be implemented to minimize the impact to the extent feasible.

As future development under the LUCE Update is proposed, the City will be required to ensure consistency with the General Plan and the policies/programs listed above. However, with the incorporation of the Proposed Project, adherence to proposed and existing City policies and programs discussed above, and continued support of Caltrans’, and SLOCOG’s and SLORTA’s efforts to address demand on US 101 in the vicinity of San Luis Obispo, these mitigation measures would not mitigate the impacts and widening to 6 lanes is not feasible.

Significance After Mitigation

Given that there are no feasible mitigation measures under the City’s purview apart from implementation of the Proposed Project policies and programs, or no enforceable plan or program that is sufficiently tied to the actual mitigation of the traffic impacts at issue, this impact is significant and unavoidable. Localized projects that require discretionary approval and may substantially increase traffic on the US 101 corridor and/or ramps would be subject to project-specific environmental review consistent with the requirements of CEQA and City Policy 12.3.11, Environmental Review. If a proposed project were determined to have the potential to result in a significant impact, mitigation measures would be implemented to minimize the impact to the extent feasible.

The following revisions are incorporated into the Final EIR

Pages 7-14 of the Draft EIR and 3-63 of the Background Report are revised as follows

3.2 Edits in Volume II, Elements and Plans (Land Use Element)

Note to Reader: Changes to the draft Land Use Element (policies, programs, and text) that arose from EIR comments and responses and were stated in Section 3.1 are incorporated by reference as changes to the Land Use Element as well, and are not repeated in this section to reduce redundancy.

Page 9 of the Draft Land Use Element is revised as follows (Figure 2)
Figure 2 of the Draft Land Use Element will be updated to list the source of map/data notes to read "City of San Luis Obispo" and "state highway" changed to "major roads". The updated figure is included at the end of this chapter.

Pages 10 and 11 of the Draft Land Use Element are revised as follows
Propose to delete the text discussion under the heading “Background to the 1994 Land Use Element” as it addresses the context of the last update and not the current proposal.

Background to the 1994 Land Use Element

The following represents a historical perspective of the update to the Land Use Element conducted in 1994 and is taken from that Element:

"The City started work on updating this element with a series of public workshops in 1988. Also, the City took a public opinion survey and established committees to give advice on the element.

The introduction to the 1977 Land Use Element contained a philosophical discussion of existing conditions and issues facing the City. The discussion is still valid today. Its premise is that the City and County, while still relatively rural and apparently capable of providing room for new residents, face some known and several undefined finite resources which may constrain growth. Furthermore, the introduction said, public attitudes towards the desirability of growth had changed since the City's first General Plan; experience with growth had caused citizens and public officials to question whether growth, even well-planned, produces benefits worth the social, economic and environmental costs and consequences. Despite such consistent and strong expression of community values, there has been continued, incremental degradation of the natural environment expressly valued by residents of San Luis Obispo.

On the environmental side, the element stated that key resources known to have finite limits were water supply and air quality. All the basic resources -- land, water and air -- can accommodate some additional growth without severe impacts, but eventually and inevitably growth must stabilize and stop, or else exceed resource limitations with destructive social, economic and environmental ramifications. The purpose of the 1977 element, the Introduction said, was to apply planning methodologies to manage the rate and extent of growth so that irreversible environmental problems would not get out of hand before they were recognized.

Concerns about environmental quality continue today, and are the basis for much of the General Plan. Votes of residents and the public opinion survey of residents done as part of the General Plan update have strongly reaffirmed the commitment of residents to preserve and enhance the environmental quality of our community. In the years since 1977 additional issues have become better defined. One, for example, is the maintenance of the remaining prime farmland in and around the City. The 1977 Element cited this as one of the primary issues facing planners, but failed to propose a concrete solution. As a result, irreplaceable agricultural land has been lost. The General Plan now proposes solutions to the continued irretrievable loss of this world-class natural asset. Another issue that was less well understood in 1977 is the preservation of important wildlife and native plant habitats. The General Plan now proposes preservation of such habitats, including planning based on the identification, mapping and monitoring of the community's existing natural assets. This element is an update of the 1977 element; it represents fine tuning rather than a new beginning."
2.2.3 Residential Density

**2.2.3.1 Density Categories**

The following residential density categories are established within the LUCE Planning Sub-area, and Table 2 for areas outside the LUCE Planning Sub-area but within the City's Planning Area. For planning studies conducted, Table 4 provides a typical population density for each residential land use designation. Residential density is expressed as the number of dwellings per acre of net site area within the designation. In determining net area, the following types of areas are excluded: sensitive features such as creeks, habitats of rare or endangered plants and animals, and significant trees; land dedicated in fee to the public for streets or neighborhood parks.

For the categories other than Rural Agriculture/Open Space, Residential Rural, Residential Suburban, and Low-Density Residential, densities are expressed in terms of a standard two-bedroom dwelling. This approach is intended to achieve population densities approximately like those indicated. More or fewer dwellings having different bedroom counts may be built depending on the number of people expected to live in a project, as indicated by the number of bedrooms. The population-density standards assumptions also apply to group residential facilities. (For allowed residential development in Office, commercial, and manufacturing districts non-residential designations, see the sections concerning those districts Table 1.)
Page 95 of the Draft Land Use Element is revised as follows ✨
Revise Policy 7.3.6 to delete the word “should.” As text in draft Land Use Element contains text underlined as an insertion, changes are highlighted in yellow.

The City shall ensure the areas designated for urban uses in the Airport Area Specific Plan, but not necessarily each parcel, should include open areas as site amenities and to protect resources, consistent with the Conservation and Open Space Element. In addition, the City shall ensure wildlife corridors across the Airport Area shall be identified and preserved.

Page 97 of the Draft Land Use Element is revised as follows ✨
In the last paragraph change the reference to “special planning areas” to “Special Focus Areas.” As text in draft Land Use Element contains text underlined as an insertion, changes are highlighted in yellow.

The special planning areas, Special Focus Areas, are those that present opportunities to develop customized land use approaches or special design implementation to enhance their appearance and achieve their respective development potential: Foothill Blvd., Upper Monterey, Mid-Higuera, Caltrans site, General Hospital site, Broad Street Area, Madonna Inn area, Sunset Drive-in, Pacific Beach, Calle Joaquin auto sales area, LOVR Creek area, and Broad Street at Tank Farm area.

Page 99 of the Draft Land Use Element is revised as follows (Figure 10) ✨
Madonna Inn area was not numbered on map, and legend did not show a number. The site and the legend have been updated to show as Site 7. The updated figure is included at the end of this chapter.

Page 115 of the Draft Land Use Element is revised as follows ✨
Add the phrase “The City Shall…” to the beginning of the new policy and program. As text in draft Land Use Element contains text underlined as an insertion, changes are highlighted in yellow.

New Policy: Renew the Urban Forest
The City shall develop a long term tree planting program to beautify the city, mitigate increased residential density, address die-off, and combat air pollution and global warming.

New Program: Urban Forest
The City shall update master tree plan and develop recommendations to renew and maintain the urban forest and plant more trees.
3.3 Edits in Volume II, Elements and Plans (Circulation Element)

Note to Reader: Changes to the draft Circulation Element (policies, programs, and text) that arose from EIR comments and responses and were stated in Section 3.1 are incorporated by reference as changes to the Circulation Element as well, and are not repeated in this section to reduce redundancy.

Page 46 of the Draft Circulation Element is revised as follows

Add additional text to the new policy. As text in draft Circulation Element contains text underlined as an insertion, changes are highlighted in yellow.

Policy 12.1.3 Idling Train Engines Coordination with Organizations Regarding Safety and Environmental Sensitivity

The City shall coordinate railroad facility infrastructure maintenance with the Union Pacific Railroad and the Public Utilities Commission and shall work with the Air Pollution Control District and others to eliminate idling train engines in San Luis Obispo.

Page 56 of the Draft Circulation Element is revised as follows

Change “tha” to “that”. As text in draft Circulation Element already contains text marked for insertion, changes proposed are highlighted in yellow.

16.0.6 New Policy Distribution of Transportation Funding

The City shall encourage SLOCOG to consider initiating a county wide revenue measure devoted to local transportation funding on the basis of population, so that San Luis Obispo County becomes a “self help” county.
3.4 Edits in Volume III, Background Report

**Note to Reader**: Changes to the Background Report that arose from EIR comments and responses and were stated in Section 3.1 are incorporated by reference as changes to the Background Report as well, and are not repeated in this section to reduce redundancy.

| The following revisions are incorporated into the Final EIR | Pages 3-49 of the Draft Background Report |

**SLOCOG Housing, Population, and Employment Projections**

In 2011 the San Luis Obispo Council of Governments (SLOCOG) projected population, housing, and employment for jurisdictions in San Luis Obispo County through 2035. The following tables provide a summary of the SLOCOG forecast which were developed prior to 2010 census data being available. As shown in the Table 3.1-12, SLOCOG developed low, medium, and high projections for population, housing units, and employment. The demand assumptions use the mid estimates for anticipated demand for population, housing units, and employment, and the low estimates for anticipated demand for population and housing based on revised projections adopted by the SLOCOG Board adopted in April 2014. For population, 1,182 units were added to 2010, 2020, and 2035 in order to account for group quarters population.

The City of San Luis Obispo population in 2010 was estimated to be 43,937. The population is anticipated to increase to 45,967 by 2020 and 48,550 by 2035. This means the city will add an additional 4,613 people (10.9 percent) between 2010 and 2035. SLOCOG estimates that the city of San Luis Obispo had 20,553 housing units in 2010. The number of housing units in the city is anticipated to increase to 21,528 by 2020 and 23,405 by 2035. This means the city will add an additional 1,873 housing units (13.1 percent) between 2010 and 2035, including 1,060 single family and 811 multifamily units. The city of San Luis Obispo had 33,000 jobs in 2010. Employment is anticipated to increase to 36,900 jobs by 2020 and 42,400 jobs by 2035; an increase of 9,400 jobs (30 percent) between 2010 and 2035. The city of San Luis Obispo had a total of 18,150,000 square feet of non-residential development in 2010, an estimate based on the number of jobs in San Luis Obispo in 2010. Non-residential development is anticipated to increase to 20,295,000 square feet by 2020 and 23,320,000 square feet by 2035. This means the city will add an additional 5,170,000 square feet by 2035.

**Table 3.1-12 Estimated and Projected Housing Units**

<table>
<thead>
<tr>
<th></th>
<th>2010 Low</th>
<th>2010 Mid</th>
<th>2010 High</th>
<th>2020 Low</th>
<th>2020 Mid</th>
<th>2020 High</th>
<th>2035 Low</th>
<th>2035 Mid</th>
<th>2035 High</th>
<th>2010-2035 Low</th>
<th>2010-2035 Mid</th>
<th>2010-2035 High</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Population</strong></td>
<td>45,119</td>
<td>45,937</td>
<td>46,755</td>
<td>46,146</td>
<td>46,966</td>
<td>47,787</td>
<td>49,390</td>
<td>49,732</td>
<td>50,074</td>
<td>4,271</td>
<td>4,613</td>
<td>4,923</td>
</tr>
<tr>
<td><strong>Housing Units</strong></td>
<td>20,553</td>
<td>20,553</td>
<td>20,553</td>
<td>21,528</td>
<td>21,528</td>
<td>21,528</td>
<td>22,982</td>
<td>23,204</td>
<td>23,405</td>
<td>2,429</td>
<td>2,651</td>
<td>2,852</td>
</tr>
<tr>
<td><strong>Employment</strong></td>
<td>33,000</td>
<td>33,000</td>
<td>33,000</td>
<td>36,900</td>
<td>36,900</td>
<td>36,900</td>
<td>41,600</td>
<td>42,400</td>
<td>44,900</td>
<td>8,600</td>
<td>9,400</td>
<td>11,900</td>
</tr>
<tr>
<td><strong>Non-Residential Development</strong></td>
<td>18,150,000</td>
<td>20,295,000</td>
<td>23,320,000</td>
<td>18,150,000</td>
<td>20,295,000</td>
<td>23,320,000</td>
<td>18,150,000</td>
<td>20,295,000</td>
<td>23,320,000</td>
<td>5,170,000</td>
<td>18,150,000</td>
<td>20,295,000</td>
</tr>
</tbody>
</table>

1. For units are based on SLOCOG Regional Population Forecasts to account for group quarters
2. Estimated using 550 non-residential square feet per job

Source: SLO County 2040 Population, Housing, and Employment Forecast (2011)
3.5 Edits in Volume IV, EIR Technical Studies

Appendix E, NOP and Responses is revised as follows

A Caltrans letter was inadvertently left out of Appendix E. The City prepared a response to the NOP comment letter and provided it to Caltrans staff during the public review period for the Draft EIR. A copy of this letter can be found at the end of this chapter.
3.6 Edits in Volume V, Circulation Assessment

Page 13 of the Draft Circulation Element is revised as follows

To clarify the text, the following will be added to the bottom of page N-2 of Appendix N, Sensitivity Analysis.

The “raw” model volume plots merely provide a visual indication of the relative redistribution of traffic resulting from a given infrastructure change. Similarly, the model networks are intended to be schematic to illustrate future network connections and should not be construed as precise plan lines.
3.7 Edited Figures

The following figures have been edited as described in Section 3.1.

Final EIS

- Figure ES-1  Land Use Options Considered
- Figure 4.15-3  City of San Luis Obispo Bicycle System
- Figure 4.15-4  San Luis Obispo Roadway Classification Map (including Future Roadways)
- Figure 4.15-5  Study Roadways

Land Use Element

- Figure 2  Urban Reserve
- Figure 10  Special Focus Areas

Circulation Element

- Figure 4.2-1  Existing and Proposed Bicycle Facilities
- Figure 4.4.-1  San Luis Obispo Roadway Classification Map

Background Report

- Figure 4.2-3  City of SLO Planning Area Williamson Act Properties
Figure 4.15-3.
City of San Luis Obispo Bicycle System
Figure 4.15-4.
San Luis Obispo Roadway Classification Map (including Future Roadways)
Figure 2
Urban Reserve

Legend
- LUCE SOI Area
- Urban Reserve
- City Limits
- Major Roads
- Roads
- Railroad
- Airport
- Water Body

Source: City of San Luis Obispo, 2012
Figure 4.2-1. San Luis Obispo Existing and Proposed Bicycle Facilities
Figure 4.4-1. San Luis Obispo Roadway Classification Map
City of SLO Planning Area Williamson Act Properties

Source: County of San Luis Obispo, Department of Planning and Building, Williamson Act, 2013

Figure 4.2-3
3.8 NOP Response Update

The Caltrans letter (see next page) was reviewed by the City and a response to the NOP comment letter was provided to CalTrans staff (response follows the Caltrans letter).
January 10, 2014

Kim Murry, Deputy Director
Community Development Department
City of San Luis Obispo
919 Palm Street
San Luis Obispo CA 93401

Dear Ms. Murry:

COMMENTS ON THE NOTICE OF PREPARATION (NOP) OF A PROGRAMMATIC ENVIRONMENTAL IMPACT REPORT (EIR) OF THE GENERAL PLAN LAND USE AND CIRCULATION ELEMENTS (LUCE) UPDATE

The California Department of Transportation (Caltrans) appreciates the opportunity to comment on the NOP in anticipation of the City’s EIR for the General Plan Land Use and Circulation Elements Update. Caltrans strives for an integrated multimodal transportation system that achieves interregional, regional, and local transportation needs. The City’s Circulation and Land Use Elements are important parts of California’s transportation planning tools. State Route 1 and US 101 play an integral role in meeting the transportation needs of the residents of San Luis Obispo and its surrounding communities and it is our hope that the LUCE acknowledges the importance of these two routes for the community.

Caltrans offers the following comments for your consideration:

1) The LUCE should strive for consistency with the US 101 Corridor Mobility Study. The San Luis Obispo Council of Governments (SLOCOG) is leading this planning effort under a Partnership Planning grant from Caltrans. Currently in development, the document should be complete by summer of 2013.

2) Caltrans would like to request an analysis of US 101 including a weaving and ramp analysis. Considering the close proximity of many of the on- and off-ramps to US 101 in San Luis Obispo, Caltrans is willing to explore consolidating the ramps to better improve safety and operations.

3) If recommendations are made regarding an interchange on US 101 at Prado Road, an overcrossing without ramps should also be considered as an alternative.

4) Caltrans supports the City’s efforts to improve transportation for all road users, including bicycle and pedestrian modes. Although US 101 is prohibited to bicycle and pedestrian access, Caltrans supports continued efforts to improve alternative routes through the City and on State Route 1.

"Caltrans improves mobility across California"
Ms. Kim Murry
Page 2

5) The LUCE should analyze safety zones around and in the flight path of the airport to adequately address its use while also addressing safety issues. Caltrans Division of Aeronautics should be consulted.

6) Caltrans’ standard for analyzing the traffic impacts of development are based on the Highway Capacity Manual methodology which measures the impact on all transportation modes (i.e. motor vehicle, bicycle, pedestrian). It may be helpful if the LUCE addressed this standard of methodology and its role in the CEQA level analysis of development projects.

7) The Caltrans Transportation Concept Report identifies the future planning concept of US 101 as a six lane facility. Any City development along US 101 that would preclude a six lane facility would constitute an inconsistency with the planning concept.

8) As part of the Department’s Intersection Control Evaluation process, Caltrans is willing to consider any proposed roundabouts as part of a strategy of planning traffic intersection control.

9) The City may want to consider additional parallel routes as a part of a strategy to relieve congestion on US 101.

If you have any questions or concerns, please feel free to contact me at (805) 549-3131 or adam.fukushima@dot.ca.gov.

Sincerely,

Adam Fukushima, PTP
Development Review
Caltrans District 5
**CalTrans Traffic Comment Letter (1/10/14)**

<table>
<thead>
<tr>
<th>Comment Number</th>
<th>Comment Issues</th>
<th>Responses</th>
</tr>
</thead>
<tbody>
<tr>
<td>Comment 1</td>
<td>Commenter states that the LUCE Update should be consistent with the US 101 Corridor Mobility Study and should be consistent with the SLOCOG planning efforts under CalTrans grants.</td>
<td>The referenced study and information generated by SLOCOG under guidance from CalTrans was used in the impact analysis and supporting traffic modeling included in the Draft EIR (please refer to Section 4.15, Traffic and Circulation).</td>
</tr>
<tr>
<td>Comment 2</td>
<td>Commenter requests an analysis of US 101 considering the proximity of on- and off-ramps to US 101 in the city and expresses willingness to work with the City on this issue.</td>
<td>Project impacts relating to US 101 and on- and off-ramp locations have been included in the analysis discussed in Section 4.15 of the Draft EIR. Impacts related to freeway facilities were identified as Class I, significant and unavoidable, and mitigation relating to on- and off-ramp widening was discussed in detail.</td>
</tr>
<tr>
<td>Comment 3</td>
<td>Commenter states that if recommendations are made regarding an interchange on US 101 at Prado Road, an overcrossing without ramps should be considered.</td>
<td>A full interchange at Prado Road is currently adopted in the regional transportation plan and the City’s general plan, therefore a full access interchange is considered the baseline. The EIR evaluate, at the programmatic level, modification of the planned improvements to eliminate the ramps and only build an overpass. This discussion is provided in Section 4.15. At this point there is no recommended change to the currently planned full access interchange.</td>
</tr>
<tr>
<td>Comment 4</td>
<td>Commenter states general support for the City’s alternative</td>
<td>Comment noted. Goals for alternative transportation and multi-modal transportation are</td>
</tr>
<tr>
<td>Comment 5</td>
<td>Commenter states that the EIR should analyze Airport safety zones with respect to development and safety issues and CalTrans should be included in discussions.</td>
<td>Please refer to the responses under the CalTrans Division of Aeronautics NOP comment letter (dated 1/6/14).</td>
</tr>
<tr>
<td>Comment 6</td>
<td>Commenter suggests that the City utilize the Highway Capacity Manual standards related to impacts on all transportation modes.</td>
<td>Please refer to Section 4.15, Traffic and Circulation, for a discussion of resources used in the impact analysis methodology. This includes consideration and use of the Highway Capacity Manual in the impact analysis.</td>
</tr>
<tr>
<td>Comment 7</td>
<td>Commenter states that future development must be compatible with the Caltrans Transportation Concept Report, which includes a future expansion of US 101 to 6-lanes.</td>
<td>Please refer to Impact CIR-3 under Section 4.15, Traffic and Circulation, for a discussion of a 6-lane expansion.</td>
</tr>
<tr>
<td>Comment 8</td>
<td>Commenter states support for the use of roundabouts for intersection control.</td>
<td>Please refer to Impact CIR-2 under Section 4.15, Traffic and Circulation, for a discussion of the use of roundabouts as mitigation for traffic control.</td>
</tr>
<tr>
<td>Comment 9</td>
<td>Commenter suggests consideration of parallel routes to relieve US 101 congestion.</td>
<td>Please refer to Impact CIR-3 under Section 4.15, Traffic and Circulation, for a discussion of traffic impacts related to US 101.</td>
</tr>
</tbody>
</table>
This Final Program EIR was prepared by Oliveira Environmental Consulting LLC in association with Matrix Design Group, Inc.; Kittelson & Associates, Inc.; Ascent Environmental, Inc.; and MintierHarnish under contract to the City of San Luis Obispo. Kim Murry, Deputy Director of Long Range Planning and Peggy Mandeville, Principal Transportation Manager, are the project manager and deputy project manager, respectively, for the City of San Luis Obispo Community Development Department. In addition to review and approval of EIR content, City staff also prepared impact analysis associated with changes to the Airport Safety Zones. Persons involved in data gathering analysis, project management, and quality control include:

**City of San Luis Obispo**

- Derek Johnson, Director, Community Development Dept.
- Kim Murry, Deputy Director of Long Range Planning
- Peggy Mandeville, Principal Transportation Planner
- Jake Hudson, Traffic Operations Manager
- Gary Kaiser, Senior Planner
- Brian Leveille, Associate Planner
- Jennifer Metz, Utilities Project Manager
- Shelly Stanwyck, Director, Parks and Recreation Dept.

**Oliveira Environmental Consulting, LLC**

- Jeff Oliveira, EIR Task Manager
- Steve Rodriguez, AICP, Environmental Analyst
- Kevin Merk, Environmental Analyst
- Jason Kirschenstein, Environmental Analyst
- David Wolff, Environmental Analyst
- Bob Sloan, Environmental Analyst

**Matrix Design Group, Inc.**

- Celeste Werner, AICP, LUCE Principal in Charge
- Rick Rust, AICP, LUCE Project Manager
- William Kavadas, Planner
- Janne Graham, Word Processing
- Cathy Lloyd, Graphics

**Kittelson & Associates, Inc.**

- Jim Damkowitch, Circulation Task Manager
- Franklin Cai, Circulation Analyst
- Alice Chen, Circulation Analyst
- Darryl DePencier, Circulation Analyst
- Amy López, Circulation Analyst

**Ascent Environmental, Inc.**

- Honey L. Walters, Senior Environmental Analyst
- Dimitri Antoniou, Environmental Analyst
- Erik de Kok, Environmental Analyst

**MintierHarnish**

- Larry Mintier, FAICP, LUCE Project Director
- Jim Harnish, JD, EIR Review
- Dov Kadin, Planner
Please see the next page.
## Agency Letters

<table>
<thead>
<tr>
<th>Letter #</th>
<th>Comment #</th>
<th>DATE</th>
<th>Commenter</th>
<th>LUCE Chapter</th>
<th>Land Use Element</th>
<th>Circulation Element</th>
</tr>
</thead>
<tbody>
<tr>
<td>A2</td>
<td></td>
<td>7/8/2014</td>
<td>Cal Poly</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>A2-1</td>
<td></td>
<td></td>
<td></td>
<td>Chapter 1 (LUE)</td>
<td>1.12.3</td>
<td></td>
</tr>
<tr>
<td>A2-3</td>
<td></td>
<td></td>
<td></td>
<td>Chapter 2 (CE)</td>
<td>2.1.4</td>
<td></td>
</tr>
<tr>
<td>A6</td>
<td></td>
<td>7/28/2014</td>
<td>SLOCOG</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>A6-11</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>A6-12</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>A6-26</td>
<td></td>
<td></td>
<td></td>
<td>Chapter 9 (LUE)</td>
<td>9.3.2</td>
<td></td>
</tr>
<tr>
<td>A6-27</td>
<td></td>
<td></td>
<td></td>
<td>Chapter 3 (CE)</td>
<td>3.0.3</td>
<td></td>
</tr>
<tr>
<td>A6-28</td>
<td></td>
<td></td>
<td></td>
<td>Chapter 7 (CE)</td>
<td>7.1.2</td>
<td></td>
</tr>
<tr>
<td>A6-29</td>
<td></td>
<td></td>
<td></td>
<td>Chapter 15 (CE)</td>
<td>15.0.5</td>
<td></td>
</tr>
<tr>
<td>A6-30</td>
<td></td>
<td></td>
<td></td>
<td>Chapter 16 (CE)</td>
<td>16.0.6</td>
<td></td>
</tr>
</tbody>
</table>

## Public Letters

<table>
<thead>
<tr>
<th>Letter #</th>
<th>Comment #</th>
<th>DATE</th>
<th>Commenter</th>
<th>LUCE Chapter</th>
<th>Land Use Element</th>
<th>Circulation Element</th>
</tr>
</thead>
<tbody>
<tr>
<td>P2</td>
<td></td>
<td>7/27/2014</td>
<td>Sierra Club</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>P2-5</td>
<td></td>
<td></td>
<td></td>
<td>Chapter 3 (LUE)</td>
<td>3.5.7.8</td>
<td></td>
</tr>
<tr>
<td>P2-6</td>
<td></td>
<td></td>
<td></td>
<td>Chapter 3 (LUE)</td>
<td>3.5.7.12</td>
<td></td>
</tr>
<tr>
<td>P2-7</td>
<td></td>
<td></td>
<td></td>
<td>Chapter 6 (LUE)</td>
<td>6.4.5</td>
<td></td>
</tr>
<tr>
<td>P2-8</td>
<td></td>
<td></td>
<td></td>
<td>Chapter 6 (LUE)</td>
<td>6.4.6</td>
<td></td>
</tr>
<tr>
<td>P2-9</td>
<td></td>
<td></td>
<td></td>
<td>Chapter 6 (LUE)</td>
<td>6.5.1</td>
<td></td>
</tr>
<tr>
<td>P2-10</td>
<td></td>
<td></td>
<td></td>
<td>Chapter 8 (LUE)</td>
<td>8.3.2.6</td>
<td></td>
</tr>
<tr>
<td>P2-11</td>
<td></td>
<td></td>
<td></td>
<td>Chapter 9 (LUE)</td>
<td>9.3.7D</td>
<td></td>
</tr>
<tr>
<td>P2-12</td>
<td></td>
<td></td>
<td></td>
<td>Chapter 1 (CE)</td>
<td>1.9</td>
<td></td>
</tr>
<tr>
<td>P2-13</td>
<td></td>
<td></td>
<td></td>
<td>Chapter 2 (CE)</td>
<td>2.1.3</td>
<td></td>
</tr>
<tr>
<td>P2-14</td>
<td></td>
<td></td>
<td></td>
<td>Chapter 3 (CE)</td>
<td>3.0.6</td>
<td></td>
</tr>
<tr>
<td>P2-15</td>
<td></td>
<td></td>
<td></td>
<td>Chapter 6 (CE)</td>
<td>6.0.5</td>
<td></td>
</tr>
<tr>
<td>P2-16</td>
<td></td>
<td></td>
<td></td>
<td>Chapter 9 (CE)</td>
<td>9.0.1</td>
<td></td>
</tr>
<tr>
<td>P2-17</td>
<td></td>
<td></td>
<td></td>
<td>Chapter 9 (CE)</td>
<td>9.1.6</td>
<td></td>
</tr>
<tr>
<td>P2-18</td>
<td></td>
<td></td>
<td></td>
<td>Chapter 14 (CE)</td>
<td>14.0.4 (add new policy)</td>
<td></td>
</tr>
<tr>
<td>P2-19</td>
<td></td>
<td></td>
<td></td>
<td>Chapter 16 (CE)</td>
<td>16.0.6</td>
<td></td>
</tr>
<tr>
<td>P2-20</td>
<td></td>
<td></td>
<td></td>
<td>Chapter 16 (CE)</td>
<td>16.1.2</td>
<td></td>
</tr>
<tr>
<td>P5</td>
<td></td>
<td>6/14/2014</td>
<td>Donna Di Gangi</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>P5-1</td>
<td></td>
<td></td>
<td></td>
<td>Chapter 9 (LUE)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>P5-3</td>
<td></td>
<td></td>
<td></td>
<td>Chapter 9 (LUE)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>P12</td>
<td></td>
<td>7/28/2014</td>
<td>Rachel Kovesdi</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>P12-4</td>
<td></td>
<td></td>
<td></td>
<td>Chapter 2 (LUE)</td>
<td>2.2.7</td>
<td></td>
</tr>
<tr>
<td>P12-5</td>
<td></td>
<td></td>
<td></td>
<td>Chapter 2 (LUE)</td>
<td>2.2.9G(b)</td>
<td></td>
</tr>
<tr>
<td>P12-6</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>P13</td>
<td></td>
<td>7/28/2014</td>
<td>James Lopes</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>P13-11</td>
<td></td>
<td></td>
<td></td>
<td>Chapter 1 (LUE)</td>
<td>1.7.3</td>
<td></td>
</tr>
</tbody>
</table>
### Public Letters

<table>
<thead>
<tr>
<th>Letter #</th>
<th>Comment #</th>
<th>DATE</th>
<th>Commenter</th>
<th>LUCE Chapter</th>
<th>Land Use Element</th>
<th>Circulation Element</th>
</tr>
</thead>
<tbody>
<tr>
<td>P15</td>
<td></td>
<td>7/25/2014</td>
<td>Santa Maria Valley Railroad Co.</td>
<td>Chapter 4 (CE)</td>
<td></td>
<td>4.1.6</td>
</tr>
<tr>
<td>P15-1</td>
<td></td>
<td></td>
<td></td>
<td>Chapter 16 (CE)</td>
<td></td>
<td>16.0.2</td>
</tr>
<tr>
<td>P15-2</td>
<td></td>
<td></td>
<td></td>
<td>Chapter 4 (CE)</td>
<td></td>
<td>4.1.6</td>
</tr>
<tr>
<td>P15-5</td>
<td></td>
<td></td>
<td></td>
<td>Chapter 12 (CE)</td>
<td></td>
<td>general comment</td>
</tr>
<tr>
<td>P15-6</td>
<td></td>
<td></td>
<td></td>
<td>Chapter 12 (CE)</td>
<td></td>
<td>12.1.3</td>
</tr>
<tr>
<td>P15-7</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Public Hearing Letters

<table>
<thead>
<tr>
<th>Letter #</th>
<th>Comment #</th>
<th>DATE</th>
<th>Commenter</th>
<th>LUCE Chapter</th>
<th>Land Use Element</th>
<th>Circulation Element</th>
</tr>
</thead>
<tbody>
<tr>
<td>PH1</td>
<td></td>
<td>7/1/2014</td>
<td>Special Joint Meeting of the City Council and Planning Commission</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>PH1-1</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>PH1-2</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>PH2</td>
<td></td>
<td>7/20/2014</td>
<td>Architectural Review Commission</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>PH2-1</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>PH3</td>
<td></td>
<td>7/17/2014</td>
<td>Bicycle Advisory Committee</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>PH3-1</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>PH4</td>
<td></td>
<td>7/27/2014</td>
<td>Cultural Heritage Committee</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>None listed</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>PH5</td>
<td></td>
<td>7/22/2014</td>
<td>Parks and Recreation Commission</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>PH5-1</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>PH5-2</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>PH5-3</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>PH5-4</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>PH5-5</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>PH6</td>
<td></td>
<td>7/9/2014</td>
<td>Mass Transit Committee</td>
<td></td>
<td></td>
<td>3.0.3, 3.0.4</td>
</tr>
<tr>
<td>PH6-1</td>
<td></td>
<td></td>
<td></td>
<td>Chapter 3 (CE)</td>
<td></td>
<td>3.1.4</td>
</tr>
<tr>
<td>PH6-2</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>