Please see the next page.
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.

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Appendix B Draft Circulation Element
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Appendix L Proposed Project Worksheets
Appendix M LOS Graphics
Appendix N Sensitivity Analysis
Please see the next page.
This 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.

**ES-1.1. 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.

<table>
<thead>
<tr>
<th>Site Letter</th>
<th>Site Description</th>
<th>Site Description Details</th>
<th>Capacity</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>Nativity Church Site</td>
<td>Removed from consideration.</td>
<td>Units: --, Population: --, Non-Residential Sq. Ft: --, Employment: --</td>
</tr>
<tr>
<td>B</td>
<td>Foothill @ Santa Rosa Area</td>
<td>Consider mixed use for the area on both sides of Foothill between Chorro and Santa Rosa. Consider both horizontal and vertical mixed use. Emphasis on retail and housing. Policies to support consideration of parking and height changes to facilitate mixed use.</td>
<td>Units: 80, Population: 183, Non-Residential Sq. Ft: -1,184, Employment: -3</td>
</tr>
<tr>
<td>E</td>
<td>Upper Monterey Area</td>
<td>No physical land use changes proposed.</td>
<td>Units: No land use changes proposed, Population: No land use changes proposed, Non-Residential Sq. Ft: No land use changes proposed, Employment: No land use changes proposed</td>
</tr>
<tr>
<td>F</td>
<td>Downtown Area</td>
<td>No physical land use changes proposed.</td>
<td>Units: No land use changes proposed, Population: No land use changes proposed, Non-Residential Sq. Ft: No land use changes proposed, Employment: No land use changes proposed</td>
</tr>
<tr>
<td>G</td>
<td>Mid-Higuera Area</td>
<td>No physical land use changes proposed.</td>
<td>Units: No land use changes proposed, Population: No land use changes proposed, Non-Residential Sq. Ft: No land use changes proposed, Employment: No land use changes proposed</td>
</tr>
<tr>
<td>H</td>
<td>Caltrans Site</td>
<td>Mixed use to include tourist commercial, office and some residential. Site may be appropriate to review height limit changes to accommodate desired development. Consider more public open space uses to serve as gateway and uses compatible with conference facilities.</td>
<td>Units: 53, Population: 121, Non-Residential Sq. Ft: 101,943, Employment: 185</td>
</tr>
<tr>
<td>I</td>
<td>General Hospital Site</td>
<td>Residential development on the site behind existing structure within the existing Urban Reserve Line. Outside the Urban Reserve Line, retain the current designation of Open Space. Policies should support flexibility so that a range of residential uses can be considered (i.e. residential care, adjunct to transitional care use, other residential uses consistent with area) within the residential land use designations.</td>
<td>Units: 41, Population: 94, Non-Residential Sq. Ft: 48,788, Employment: 89</td>
</tr>
<tr>
<td>Site Letter</td>
<td>Site Description</td>
<td>Capacity</td>
<td></td>
</tr>
<tr>
<td>-------------</td>
<td>----------------------------------------------------------------------------------</td>
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<td></td>
</tr>
<tr>
<td>J</td>
<td><strong>Broad Street Area</strong>&lt;br&gt;Incorporate physical alternative described in South Broad Street Area Plan endorsed on September 17, 2013 by City Council (Council Resolution 10460).</td>
<td>589 1,349 229,068 416</td>
<td></td>
</tr>
<tr>
<td>K</td>
<td><strong>Sunset Drive-In/Prado Road Site</strong>&lt;br&gt;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>
<td>0 0 483,668 879</td>
<td></td>
</tr>
<tr>
<td>L</td>
<td><strong>San Luis Ranch Specific Plan Area</strong>&lt;br&gt;Consideration of a mix of uses with a substantial open space/agriculture component. Residential uses to be consistent with applicable airport policies.</td>
<td>500 1,145 470,000 855</td>
<td></td>
</tr>
<tr>
<td>M</td>
<td><strong>Pacific Beach Site</strong>&lt;br&gt;Policy development to support consideration of Commercial Retail/mixed use fronting LOVR and Froom Ranch and park to serve neighborhood.</td>
<td>38 87 -37,352 -68</td>
<td></td>
</tr>
<tr>
<td>N</td>
<td><strong>Calle Joaquin Auto Sales Area</strong>&lt;br&gt;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>
<td>0 0 200,066 364</td>
<td></td>
</tr>
<tr>
<td>O</td>
<td><strong>Madonna Specific Plan Area</strong>&lt;br&gt;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>
<td>115 263 336,170 611</td>
<td></td>
</tr>
<tr>
<td>P</td>
<td><strong>LOVR Creekside Area</strong>&lt;br&gt;Consideration of medium high density residential infill housing with open space.</td>
<td>159 364 0 0</td>
<td></td>
</tr>
<tr>
<td>Q</td>
<td><strong>Margarita Specific Plan</strong>&lt;br&gt;Policy to support consideration of changes to the previously approved Specific Plan to allow increased density on eastern portion of specific plan site.</td>
<td>No land use changes proposed No land use changes proposed No land use changes proposed No land use changes proposed</td>
<td></td>
</tr>
<tr>
<td>R</td>
<td><strong>Broad St. @ Tank Farm Rd. Site</strong>&lt;br&gt;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>41 94 135,906 247</td>
<td></td>
</tr>
</tbody>
</table>
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.

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 Letter</th>
<th>Site Description</th>
<th>Capacity</th>
</tr>
</thead>
<tbody>
<tr>
<td>S</td>
<td>Avila Ranch Specific Plan Area</td>
<td></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>700</td>
</tr>
</tbody>
</table>

The table above 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          | Buckley Rd. to LOVR Connections  
Consider (Buckley to Higuera connection and Higuera to LOVR behind Los Verdes - 101 bypass. |
ES-1.2. 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-1.3. Summary of Impacts and Mitigation Measures

Table EX-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-1.4. 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. The three additional street network changes were options identified during the preliminary public review of potential street system changes but were not included in the proposed Circulation Element.

**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. 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. 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-1.5. 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-1.6. 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><strong>Impact AQ-2 (Long-Term)</strong></td>
<td>Implementation of the LUCE Update would involve operation of development projects that generate long-term emissions of criteria air pollutants and ozone precursors. 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. However, 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><strong>Impact LU-1</strong></td>
<td>The proposed LUCE Update would have the potential to conflict with an applicable land use plan of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect. With the implementation of proposed LUCE Update policies, potential land use conflict impacts are considered to be a Class I, significant and unavoidable impact.</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>No mitigation measures have been identified to reduce potential inconsistencies with the existing ALUP to a less than significant level.</td>
<td></td>
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</tbody>
</table>
### Impact Mitigation Measures Significance After Mitigation

<table>
<thead>
<tr>
<th>Impact</th>
<th>Mitigation Measures</th>
<th>Significance After Mitigation</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Noise</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Impact N-1</strong> 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>Enforcement of the Noise Element and noise control ordinance with respect to the existing practice that accommodates infill construction activity during the currently allowed hours of 7 AM to 7 PM would reduce impacts to the extent feasible.</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>
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<td></td>
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<tr>
<td><strong>Impact CIR-1</strong> 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>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. As such, with the incorporation of the proposed project and adherence to proposed and existing City policies and programs discussed above, existing and proposed City policies that contribute to reducing volumes along roadways would partially mitigate this impact. However, the impact would remain potentially significant and unavoidable.</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> 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 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.</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 land use or other evidence for right of way assignment beyond that provided by stop controls must be demonstrated. The City will adhere to Caltrans’ process for intersection control evaluation.</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. However, many of the proposed mitigations are infeasible due to right-of-way or funding constraints. Therefore, the impact remains significant and unavoidable.</td>
</tr>
<tr>
<td>Impact</td>
<td>Mitigation Measures</td>
<td>Significance After Mitigation</td>
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</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). Augment bicycle facilities and improve transit headways on Broad Street.</td>
<td></td>
</tr>
<tr>
<td>CIR-7. Broad &amp; Rockview (#94)</td>
<td>Install downstream signal at Broad &amp; Capitolio. Augment bicycle facilities and improve transit headways on Broad Street.</td>
<td></td>
</tr>
<tr>
<td>CIR-8. Broad &amp; Capitolio (#95)</td>
<td>Install increased traffic control (traffic signal or roundabout). Augment bicycle facilities and improve transit headways on Broad Street.</td>
<td></td>
</tr>
<tr>
<td>CIR-10. Broad &amp; Tank Farm (#98)</td>
<td>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.</td>
<td></td>
</tr>
<tr>
<td><strong>Impact CIR-3</strong></td>
<td>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 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>
</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>Agricultural Resources</strong></td>
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<tr>
<td><strong>Impact AG-2</strong></td>
<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: <strong>AG-1 1.7.1 Open Space Protection</strong> 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>
</tr>
<tr>
<td><strong>Air Quality</strong></td>
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</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>
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</tr>
<tr>
<td><strong>Cultural Resources</strong></td>
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</tr>
<tr>
<td>Impact CR-1</td>
<td>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:</td>
<td>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.</td>
</tr>
<tr>
<td>CR-1 3.3.2 Demolitions</td>
<td>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 are infeasible.</td>
<td></td>
</tr>
<tr>
<td>CR-2 3.3.5</td>
<td>Historic districts and neighborhoods. In evaluating new public or private development, the City should identify and protect neighborhoods or districts having historical character due to the collective effect of Contributing or Master List historic properties.</td>
<td></td>
</tr>
<tr>
<td>CR-3 3.5.10 Southern Pacific Water Tower</td>
<td>The historic Southern Pacific Water Tower and adjoining City-owned land should shall be maintained as open space or parkland.</td>
<td></td>
</tr>
<tr>
<td>Impact</td>
<td>Mitigation Measures</td>
<td>Significance After Mitigation</td>
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<tr>
<td><strong>Public Services</strong></td>
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<tr>
<td><strong>Impact PS-1</strong></td>
<td>Buildout of the proposed Land Use Element would increase the demand for fire protection services by increasing population and the number of structures in the city. This is a Class II, potentially significant but mitigable impact.</td>
<td>The following policy shall be added to the proposed Land Use Element prior to adoption: <strong>PS-1 New Policy</strong> 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.</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>
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</tr>
<tr>
<td><strong>Impact AES-1</strong></td>
<td>None required.</td>
<td>Less than significant.</td>
</tr>
<tr>
<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>
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<tr>
<td><strong>Impact AES-2</strong></td>
<td>None required.</td>
<td>Less than significant.</td>
</tr>
<tr>
<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>
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<tr>
<td><strong>Impact AES-3</strong></td>
<td>None required.</td>
<td>Less than significant.</td>
</tr>
<tr>
<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>
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<tr>
<td><strong>Agricultural Resources</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Impact AG-1</strong></td>
<td>None required</td>
<td>Less than significant.</td>
</tr>
<tr>
<td>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.</td>
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<td></td>
</tr>
<tr>
<td><strong>Biological Resources</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Impact BIO-1</strong></td>
<td>None required</td>
<td>Less than significant.</td>
</tr>
<tr>
<td>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.</td>
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<tr>
<td>Impact</td>
<td>Mitigation Measure</td>
<td>Significance After Mitigation</td>
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</table>
| **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. |
| **Impact BIO-5**  
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. | None required. | Less than significant. |
<table>
<thead>
<tr>
<th>Impact</th>
<th>Mitigation Measure</th>
<th>Significance After Mitigation</th>
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</thead>
<tbody>
<tr>
<td><strong>Cultural Resources</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Impact CR-2</td>
<td>None required.</td>
<td>Less than significant.</td>
</tr>
<tr>
<td>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>
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<tr>
<td><strong>Geology and Soils</strong></td>
<td></td>
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<tr>
<td>Impact GEO-1</td>
<td>None required.</td>
<td>Less than significant.</td>
</tr>
<tr>
<td>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></td>
<td></td>
</tr>
<tr>
<td>Impact GEO-2</td>
<td>None required.</td>
<td>Less than significant.</td>
</tr>
<tr>
<td>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>
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<tr>
<td>Impact GEO-3</td>
<td>None required.</td>
<td>Less than significant.</td>
</tr>
<tr>
<td>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>
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<tr>
<td>Impact GEO-4</td>
<td>None required.</td>
<td>Less than significant.</td>
</tr>
<tr>
<td>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>
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<td>Impact</td>
<td>Mitigation Measure</td>
<td>Significance After Mitigation</td>
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<tr>
<td><strong>Global Climate Change</strong></td>
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<tr>
<td><strong>Impact GCC-1</strong></td>
<td>None required.</td>
<td>Less than significant.</td>
</tr>
<tr>
<td>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>
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<thead>
<tr>
<th>Hazards and Hazardous Materials</th>
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<tbody>
<tr>
<td><strong>Impact HAZ-1</strong></td>
<td>None required.</td>
<td>Less than significant.</td>
</tr>
<tr>
<td>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>
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</table>

| **Impact HAZ-2**                   | None required.     | Less than significant.      |
| 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. | None required. | Less than significant. |

| **Impact HAZ-3**                   | None required.     | Less than significant.      |
| 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. | None required. | Less than significant. |

| **Impact HAZ-4**                   | None required.     | Less than significant.      |
| 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. | None required. | Less than significant. |
### Impact HAZ-5
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.

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<tr>
<th>Mitigation Measure</th>
<th>Significance After Mitigation</th>
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<tr>
<td>None required.</td>
<td>Less than significant.</td>
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</table>

### Hydrology and Water Quality

#### Impact HWQ-1
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.

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<tr>
<th>Mitigation Measure</th>
<th>Significance After Mitigation</th>
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<tr>
<td>None required.</td>
<td>Less than significant.</td>
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</table>

#### Impact HWQ-2
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.

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<thead>
<tr>
<th>Mitigation Measure</th>
<th>Significance After Mitigation</th>
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<tbody>
<tr>
<td>None required.</td>
<td>Less than significant.</td>
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</table>

#### Impact HWQ-3
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.

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<tr>
<th>Mitigation Measure</th>
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<tr>
<td>None required.</td>
<td>Less than significant.</td>
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</table>

#### Impact HWQ-4
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.

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<tr>
<th>Mitigation Measure</th>
<th>Significance After Mitigation</th>
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<tbody>
<tr>
<td>None required.</td>
<td>Less than significant.</td>
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### Land Use

#### Impact LU-2
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.

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<thead>
<tr>
<th>Mitigation Measure</th>
<th>Significance After Mitigation</th>
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<tbody>
<tr>
<td>None required.</td>
<td>Less than significant.</td>
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<tr>
<td>Impact</td>
<td>Mitigation Measure</td>
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<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>
</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>
</tr>
<tr>
<td><strong>Noise</strong></td>
<td></td>
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<tr>
<td><strong>Impact N-2</strong>&lt;br&gt;Long-Term Roadway and Railroad Traffic Noise Levels&lt;br&gt;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.&lt;br&gt;New development associated with the proposed LUCE Update 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.</td>
<td>None required.</td>
</tr>
<tr>
<td><strong>Impact N-3</strong>&lt;br&gt;Exposure of Noise Sensitive Receptors to Stationary Sources.&lt;br&gt;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.</td>
<td>None required.</td>
</tr>
<tr>
<td>Impact</td>
<td>Mitigation Measure</td>
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</tr>
<tr>
<td><strong>Impact N-4</strong></td>
<td>None required.</td>
</tr>
<tr>
<td>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.</td>
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</table>

| Impact N-5          | None required.     | Less than significant.      |
| 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         | None required.     | Less than significant.      |
| 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. |

| Impact PH-2         | None required.     | Less than significant.      |
| 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. |

### Public Services

| Impact PS-2         | None required.     | Less than significant.      |
| 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. |

<p>| Impact PS-3         | None required.     | Less than significant.      |
| 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. |</p>
<table>
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<tr>
<th>Impact</th>
<th>Mitigation Measure</th>
<th>Significance After Mitigation</th>
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<tbody>
<tr>
<td><strong>Recreation</strong></td>
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<td></td>
</tr>
<tr>
<td><strong>Impact REC-1</strong></td>
<td>The proposed LUCE Update would result in less than significant recreation-related environmental impacts and no mitigation measures are required. Although the LUCE Update would result in less than significant environmental impacts related to the provision of parkland in the city, 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 goal 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 and no mitigation is required. Recommendations to address the City’s goals for meeting the per capita parkland ratio include, but are not limited to, the following additions to the Parks and Recreation Element: Development may be required to fund or dedicate parkland greater than what is required through the Quimby Act in order to meet the community’s needs and goals for parkland. The City shall pursue a gift of Cuesta Park from the County to the City as part of the City’s parkland system.</td>
<td>Less than significant.</td>
</tr>
</tbody>
</table>
### Impact REC-2
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.

<table>
<thead>
<tr>
<th>Impact</th>
<th>Mitigation Measure</th>
<th>Significance After Mitigation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Impact REC-2</td>
<td>None required.</td>
<td>Less than significant.</td>
</tr>
</tbody>
</table>

### Traffic and Circulation

<table>
<thead>
<tr>
<th>Impact</th>
<th>Mitigation Measure</th>
<th>Significance After Mitigation</th>
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</thead>
<tbody>
<tr>
<td>Impact CIR-4</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. Therefore, mitigation measures are not required.</td>
<td>Less than significant.</td>
</tr>
<tr>
<td>Impact CIR-5</td>
<td>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.</td>
<td>Less than significant.</td>
</tr>
<tr>
<td>Impact CIR-6</td>
<td>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.</td>
<td>Less than significant.</td>
</tr>
<tr>
<td>Impact CIR-7</td>
<td>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.</td>
<td>Less than significant.</td>
</tr>
<tr>
<td>Impact CIR-8</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. Therefore, mitigation measures are not required.</td>
<td>Less than significant.</td>
</tr>
</tbody>
</table>
## Utilities and Service Systems

<table>
<thead>
<tr>
<th>Impact</th>
<th>Mitigation Measure</th>
<th>Significance After Mitigation</th>
</tr>
</thead>
</table>
| **Impact USS-1**  
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. | None required. | Less than significant. |
| **Impact USS-2**  
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. | None required. | Less than significant. |
| **Impact USS-3**  
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. | None required. | Less than significant. |
| **Impact USS-4**  
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. | None required. | Less than significant. |
Please see the next page.
This document is a Draft Environmental Impact Report (EIR) 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. The LUCE Update includes goals, objectives, and policies that will guide the development of San Luis Obispo.

This section: (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 other EIR sections are as follows:

- **Section 2.0, Project Description**, provides a detailed discussion of the draft Land Use and Circulation Elements Update.
- **Section 3.0, Environmental Setting**, describes the general environmental setting for San Luis Obispo.
- **Section 4.0, Environmental Impact Analysis**, describes the potential environmental effects associated with the LUCE Update.
- **Section 5.0, Alternatives**, discusses alternatives to the draft LUCE Update, including the CEQA-required “no project” alternative.
- **Section 6.0, Other CEQA Requirements**, discusses issues such as growth inducement and significant irreversible environmental effects.
- **Section 7.0, References and Preparers**, lists informational sources for the EIR and persons involved in the preparation of the document.

### 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
Draft LUCE Program EIR

- 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, including residents, property owners, and businesses. Through the LUCE, the City informs these groups of its goals, policies, and standards, thereby communicating expectations of the public and private sectors 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.
1.0 Introduction

- 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 includes the development of a draft Pedestrian Circulation Plan for the Downtown as part of the Circulation Element update.
- 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 need to be reviewed for their development potential.

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 flexibility 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, 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. Disclose any potential growth-inducing and/or cumulative impacts associated with the LUCE Update; and

5. 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). 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.

Future Fair 4 is scheduled for May 31, 2014, to be held at the City/County Library, in order to introduce the program EIR and provide an opportunity for the public to ask City staff and the consultant team questions pertaining to the LUCE Update and associated EIR, and to provide comments on the Draft 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 226.
- The Airport Land Use Commission (ALUC) has the responsibility of ensuring 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. 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.
Please see the next page.
This section describes the components of the proposed City of San Luis Obispo Land Use and Circulation Elements Update Project (LUCE Update). The Land Use Element designates the general location and intensity of housing, business, industry, open space, education, public buildings and facilities, and other land uses. It helps guide neighborhood preservation, revitalization, and enhancement and protects environmental resources. The Circulation Element includes goals and policies relating to how residents, products, and visitors move around San Luis Obispo. This element addresses movement by vehicles, bicycles, pedestrians, aircraft, rail, and public transportation.

2.1. Project Location

The City of San Luis Obispo is located in the Central Coast Region of California along U.S. Highway 101, about 230 miles south of San Francisco and 190 miles north of Los Angeles (see Figure 2.1-1). Its coastal location is characterized by a mild Mediterranean climate that is moderated by the influence of the Pacific Ocean. The city is about 10 miles inland from the coast in a narrow valley between the Santa Lucia Mountains and volcanic hills that reach an elevation of up to 3,000 feet. The city is surrounded by agriculture and open space, including vineyards, field crops, oak woodland, and grasslands. San Luis Obispo Creek bisects the town and is a defining feature of the downtown district.

2.2. Overview

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;
Figure 2.1-1
San Luis Obispo Regional Setting

Legend

- City Limits
- Railroads
- Highways
- National Park - Forest
- Local Roads
- Rivers
- Major Lakes

Source: City of San Luis Obispo, 2012
2.0 Project Description

- 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 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.

2.3. Project Background

California law requires each city and county to adopt a general plan “for the physical development of the county or city, and any land outside its boundaries which bears relation to its planning.” The California Supreme Court has called the general plan the “constitution for future development.” The general plan expresses the community’s development goals and embodies public policy relative to the distribution of future land uses, both public and private. The City’s General Plan guides the use and protection of various resources to meet community purposes and values among a wide diversity of citizen preferences within a framework set by State law.

The General Plan is typically published in separately adopted sections, called Elements. The City’s General Plan includes the seven Elements mandated by State law and two optional Elements. The mandatory Elements include: Land Use (1994); Circulation (1994); Noise (1996); Safety (2012); Conservation (2006); Open Space (2006); and Housing (2010). The optional Elements include Parks and Recreation (2001) and Water and Wastewater Management (2010). The dates in
parentheses indicate the last time each General Plan element was substantially revised. The proposed Project is an update to the Land Use and Circulation Elements and does not include major revisions to the other adopted Elements of the General Plan; however, future minor revisions to other Elements may be proposed to ensure internal consistency.

**2.3.1. Land Use Element**

The California General Plan Guidelines (2003) provides the following description of the Land Use Element:

“The land use element functions as a guide to planners, the general public, and decision-makers as to the ultimate pattern of development for the city or county at build-out. The land use element has perhaps the broadest scope of the seven mandatory elements. In theory, it plays a central role in correlating all land use issues into a set of coherent development policies. Its objectives, policies, and programs relate directly to the other elements. In practice, it is the most visible and often-used element in the local general plan. Although all general plan elements carry equal weight, the land use element is often perceived as being most representative of “the general plan.”

The City of San Luis Obispo’s existing Land Use Element provides a generalized blueprint for the future of the City and sets forth a pattern for the orderly development of land within the City’s planning area. The Element describes the expected level of population growth resulting from construction of the types of housing units included in the plan, as well as the kinds of new commercial and industrial development that are responsive to the City’s economic needs.

State planning law requires that the general plan cover all territory within the boundaries of the adopting city or county as well as “any land outside its boundary which in the planning agency’s judgment bears relation to its planning” (Government Code Section 65300). To carry out this directive, most cities formally delineate a “planning area” boundary in their general plans. The City’s Planning Area coincides with the County’s San Luis Obispo planning area and can be generally described as extending to the ridge of the Santa Lucia Mountains (Cuesta Ridge) to the north and east; the southerly end of the Edna Valley (northern Arroyo Grande Creek watershed boundary) to the southeast; the ridge of the Davenport Hills to the southwest; and the ridge of the Irish Hills, Turri Road in the Los Osos Valley, and Cuesta College in the Chorro Valley to the west. The San Luis Obispo city limits and the City’s Planning Area boundary and are depicted on Figure 2.3-1. The Planning Area shown on this figure is used for all of the General Plan elements, and was not modified as part of the LUCE Update.

While the LUCE Update references the complete Planning Area, changes in land use and circulation alternatives were limited to a smaller, urbanized core area referred to as the LUCE Sphere of Influence Planning Subarea (LUCE SOI Planning Subarea). This smaller area is shown on Figure 2.3-2. There are 13,146 acres of land within the LUCE SOI Planning Subarea.

Generally, the most familiar part of the general plan is the Land Use Diagram, which illustrates the types and locations of existing and future development location, types, and intensity envisioned by the general plan. The City’s existing Land Use Diagram is provided on Figure 2.3-3. State planning law also requires general plans to establish “standards of population density and building intensity” for the various land use designations in the general plan. To satisfy this requirement, the Land Use Element includes such standards for each land use designation appearing on the Land Use Diagram.

Table 2.3-1 shows how the existing Land Use Element organizes land use designations into three categories: Residential, Commercial and Industrial, and Other. There are 20 land use designations that are subsets to the three major categories. The Land Use Element also establishes a permanent open space greenbelt at the edge of the community that limits commercial and residential development on sensitive hillsides (see Figure 5 in the Conservation and Open Space Element for more details).

Much of the land in the City is designated as low-density residential (2,051 acres), services and manufacturing (1,050 acres), public (910 acres), or medium-density residential (825 acres). Additionally, there are 273 acres of land designated as rural residential and 320 acres of land designated as suburban residential outside of the LUCE SOI Planning Subarea. All other land outside the LUCE SOI Planning Subarea is designated as open space.
Figure 2.3-1
Planning Areas
2.0  Project Description

Figure 2.3-3
Existing General Plan Land Use Diagram

Legend
- City Limits
- Land Use & Circulation Planning Subarea

Land Use Designations
- Agriculture
- Park
- Recreation

Source: City of San Luis Obispo; July 2010

June 2014
**Table 2.3-1. Existing San Luis Obispo General Plan Land Use Designations**

<table>
<thead>
<tr>
<th>General Plan Designations</th>
<th>Acres</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Residential Designations</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Rural Residential (County Area)</td>
<td>282</td>
<td>2.15%</td>
</tr>
<tr>
<td>Suburban Residential (County Area)</td>
<td>88</td>
<td>0.67%</td>
</tr>
<tr>
<td>Low Density Residential</td>
<td>2,051</td>
<td>15.60%</td>
</tr>
<tr>
<td>Medium Density Residential</td>
<td>825</td>
<td>6.28%</td>
</tr>
<tr>
<td>Medium-High Density Residential</td>
<td>282</td>
<td>2.15%</td>
</tr>
<tr>
<td>High Density Residential</td>
<td>233</td>
<td>1.77%</td>
</tr>
<tr>
<td>Residential Neighborhood</td>
<td>5</td>
<td>0.04%</td>
</tr>
<tr>
<td><strong>Commercial and Industrial Designations</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>General Retail</td>
<td>354</td>
<td>2.69%</td>
</tr>
<tr>
<td>Neighborhood Commercial</td>
<td>41</td>
<td>0.31%</td>
</tr>
<tr>
<td>Community Commercial</td>
<td>64</td>
<td>0.49%</td>
</tr>
<tr>
<td>Tourist Commercial</td>
<td>128</td>
<td>0.97%</td>
</tr>
<tr>
<td>Office</td>
<td>229</td>
<td>1.74%</td>
</tr>
<tr>
<td>Services and Manufacturing</td>
<td>1,050</td>
<td>7.99%</td>
</tr>
<tr>
<td>Business Park</td>
<td>322</td>
<td>2.45%</td>
</tr>
<tr>
<td><strong>Other Designations</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Public</td>
<td>910</td>
<td>6.92%</td>
</tr>
<tr>
<td>Park</td>
<td>219</td>
<td>1.67%</td>
</tr>
<tr>
<td>Recreation</td>
<td>53</td>
<td>0.40%</td>
</tr>
<tr>
<td>Open Space</td>
<td>6,026</td>
<td>45.84%</td>
</tr>
<tr>
<td>Interim Open Space</td>
<td>184</td>
<td>1.40%</td>
</tr>
<tr>
<td>Agricultural</td>
<td>77</td>
<td>0.59%</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td>13,146</td>
<td>100.00%</td>
</tr>
</tbody>
</table>

*Source: San Luis Obispo General Plan; City of San Luis Obispo, 2012*

Existing land use and development conditions within the city limits and the LUCE SOI Planning Subarea are depicted on Figure 2.3-4. The land use types and the area occupied by the land uses within the LUCE SOI Planning Subarea are summarized on Table 2.3-2.
2.0 Project Description

Figure 2.3-4
Existing Land Use

Legend
- Land Use and Circulation Planning Subarea
- City Limits
- Open Space
- Agriculture
- Commercial Retail
- Commercial Services
- Office
- Industrial
- Rural Residential
- Single Family Residential
- Multifamily Residential
- Mixed-Use
- Other/Right-of-Way
- Parks and Recreation
- Public Quasi Public
- Vacant
- Multiple Use

Source: City of San Luis Obispo, Southern California Gas Company, Miniter Hanratty, July 2012

June 2014
### Table 2.3-2. Existing (2012) Land Use San Luis Obispo Land Use and Circulation Planning Subarea

<table>
<thead>
<tr>
<th>Existing Land Use</th>
<th>Acres</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rural Residential</td>
<td>230</td>
<td>1.75%</td>
</tr>
<tr>
<td>Single Family Residential</td>
<td>1,756</td>
<td>13.35%</td>
</tr>
<tr>
<td>Multifamily Residential</td>
<td>328</td>
<td>2.49%</td>
</tr>
<tr>
<td>Mixed Use</td>
<td>15</td>
<td>0.11%</td>
</tr>
<tr>
<td>Multiple Use</td>
<td>1,668</td>
<td>12.69%</td>
</tr>
<tr>
<td>Commercial Retail</td>
<td>145</td>
<td>1.11%</td>
</tr>
<tr>
<td>Commercial Services</td>
<td>212</td>
<td>1.61%</td>
</tr>
<tr>
<td>Office</td>
<td>47</td>
<td>0.35%</td>
</tr>
<tr>
<td>Industrial</td>
<td>384</td>
<td>2.92%</td>
</tr>
<tr>
<td>Public/Quasi Public</td>
<td>832</td>
<td>6.33%</td>
</tr>
<tr>
<td>Parks and Recreation</td>
<td>387</td>
<td>2.94%</td>
</tr>
<tr>
<td>Agriculture</td>
<td>490</td>
<td>3.72%</td>
</tr>
<tr>
<td>Open Space</td>
<td>4,902</td>
<td>37.28%</td>
</tr>
<tr>
<td>Vacant</td>
<td>336</td>
<td>2.55%</td>
</tr>
<tr>
<td>Other/Right-of-Way</td>
<td>1,420</td>
<td>10.79%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>13,152</td>
<td>100%</td>
</tr>
</tbody>
</table>

1: Total acreage is higher than shown on Table 2.2-1 due to rounding

Sources: City of San Luis Obispo, 2012.

### 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 total square feet of new non-residential floor area, 5,040 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.
<table>
<thead>
<tr>
<th>Specific Plans</th>
<th>Acres</th>
<th>Typical Density</th>
<th>Capacity</th>
</tr>
</thead>
<tbody>
<tr>
<td>Margarita Area Specific Plan</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>Airport Area Specific Plan</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>Orcutt Area Specific Plan</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td><strong>Subtotal</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Planned and Approved Projects</th>
<th>Acres</th>
<th>Typical Density</th>
<th>Capacity</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chinatown Project</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>Pacific Courtyards</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>Mission Estates</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>Four Creeks (Creekston and Laurel Creek)</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>Garden Street Terrace</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>313 South Street Apartments</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>Marsh Street Commons</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>ICON project (1340 Taft)</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td><strong>Subtotal</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Other Vacant Land (by General Pan Designation)</th>
<th>Acres</th>
<th>Typical Density</th>
<th>Capacity</th>
</tr>
</thead>
<tbody>
<tr>
<td>Suburban Residential</td>
<td>4.0</td>
<td>1</td>
<td>N/A</td>
</tr>
<tr>
<td>Low Density Residential</td>
<td>53.4</td>
<td>6</td>
<td>N/A</td>
</tr>
<tr>
<td>Medium Density Residential</td>
<td>7.1</td>
<td>10</td>
<td>N/A</td>
</tr>
<tr>
<td>Medium-High Density Residential</td>
<td>0.4</td>
<td>16</td>
<td>N/A</td>
</tr>
<tr>
<td>High Density Residential</td>
<td>2.7</td>
<td>19</td>
<td>N/A</td>
</tr>
<tr>
<td>Neighborhood Commercial</td>
<td>0.2</td>
<td>N/A</td>
<td>0.30</td>
</tr>
<tr>
<td>Community Commercial</td>
<td>3.2</td>
<td>N/A</td>
<td>0.30</td>
</tr>
<tr>
<td>Tourist Commercial</td>
<td>1.0</td>
<td>N/A</td>
<td>0.35</td>
</tr>
<tr>
<td>Office</td>
<td>1.3</td>
<td>N/A</td>
<td>0.35</td>
</tr>
<tr>
<td>Services and Manufacturing</td>
<td>13.3</td>
<td>N/A</td>
<td>0.25</td>
</tr>
<tr>
<td>Public</td>
<td>0.4</td>
<td>N/A</td>
<td>0.35</td>
</tr>
<tr>
<td><strong>Subtotal</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

| Total Capacity in These Areas | | | | | | | |
|-------------------------------|-------|-----------------|----------|
|                                | 2,588 | 5,926 | 3,090,265 | 7,418 |
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; Mintir Harnish, 2012.

Table 2.3-4. Estimated and Projected Housing Units

<table>
<thead>
<tr>
<th></th>
<th>2010</th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Low</td>
<td>Mid</td>
<td>High</td>
<td>Low</td>
<td>Mid</td>
</tr>
<tr>
<td>Population</td>
<td>43,937</td>
<td>43,937</td>
<td>43,937</td>
<td>45,964</td>
<td>45,969</td>
</tr>
<tr>
<td>Housing Units</td>
<td>20,553</td>
<td>20,553</td>
<td>20,553</td>
<td>21,523</td>
<td>21,526</td>
</tr>
<tr>
<td>Employment</td>
<td>33,000</td>
<td>33,000</td>
<td>33,000</td>
<td>36,900</td>
<td>36,900</td>
</tr>
<tr>
<td>Non-Residential</td>
<td>18,150,000</td>
<td>20,295,000</td>
<td>23,320,000</td>
<td>5,170,000</td>
<td></td>
</tr>
<tr>
<td>Development</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

1 Estimated using 550 non-residential square feet per job

Source: SLO County 2040 Population, Housing, and Employment Forecast (2011)
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 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 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 18,150,000 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.

### 2.3.2. Circulation Element

Transportation facilities and programs can influence the character of neighborhoods, the location of specific land uses, and the overall form of the City. Therefore, the vision for San Luis Obispo described by the Land Use Element is influenced by the layout and capacity of streets and the location of other transportation facilities. The California General Plan Guidelines (2003) provides the following description of how the provisions of the Circulation Element affect a community’s physical, social, and economic environment:

**Physical.** The circulation system is one of the chief generators of physical settlement patterns and its location, design, and constituent modes have major impacts on air quality, plant and animal habitats, environmental noise, energy use, community appearance, and other environmental components.

**Social.** The circulation system is a primary determinant of the pattern of human settlement. It has a major impact on the areas and activities it serves, on community cohesion, and on the quality of human life. The circulation system should be accessible to all segments of the population, including the disadvantaged, the young, the poor, the elderly, and the disabled.

**Economic.** Economic activities normally require circulation for materials, products, ideas, and employees, thus the viability of the community’s economy is directly affected by the circulation element. The efficiency of a community’s circulation system can either contribute to or adversely affect its economy.”

### 2.4. Updated Land Use Element

The 1994 Land Use Element provides an Introduction and ten chapters pertaining to Growth Management, Conservation and Development of Residential Neighborhoods, Commercial and Industrial Development, Downtown, Public and Cultural Facilities, Resource Protection, Airport Area, Optional Use & Special Design Areas, Review and Amendment, and Implementation. The proposed Land Use Element Update retains the basic structure of the 1994 Land Use Element and adds three new sections pertaining to Sustainability, Safety by Design, and Healthy Community. The general content of and proposed revisions to each chapter of the Land Use Element are summarized below. The full text of updated Land Use Element text, policies and programs is incorporated into the EIR by reference and can be reviewed at the City of San Luis Obispo Community Development Department, located at 919 Palm Street, during normal business hours. The full text of the updated Land Use Element may also be obtained at:

http://www.slo2035.com

#### 2.4.1. Introduction Chapter

The Introduction chapter provides background information regarding the other Elements of the City’s General Plan, the history of the Land Use Element, and how community values have influenced the development of previous versions and the proposed update of the Land Use Element. The Introduction also provides the Land Use Element goals, which are organized under the subheadings of Approach to Planning, Environment, Society and Economy, and City Form. The Land Use Element Update includes the addition of five new goals related to: priority setting and resource allocation, creating a sustainable community, energy efficiency, enhancing the health and wellbeing of City residents, and neighborhood design.
An updated feature of the Introduction chapter are Tables 1 and 2, which consolidate information provided in various chapters of the 1994 Land Use Element regarding the land use designations included on the proposed Land Use Diagram (Figure 2.4-1). Tables 1 and 2 provide a summary describing each land use designation, the land use designation’s purpose and application, the types of uses allowed, and density/intensity parameters.

Land Use Element Table 1 describes the General Plan land use designations and development standards applicable to the Land Use and Circulation Element Planning Subarea. The land use designation information provided on Land Use Element Table 1 is substantially the same as the requirements of the 1994 Land Use Element; however, several changes have been proposed and are summarized below.

- The existing “Interim Open Space” land use designation is proposed for deletion. Areas currently designated “Interim Open Space” would be designated as permanent open space (i.e., an “Open Space” land use designation would be applied to those areas); would be assigned a land use designation (such as Residential Medium-High density residential); or would be designated as a special design area meriting policy direction for future development potential.
- The maximum residential unit density allowed by the “Medium-High Density Residential” land use designation would be increased from 18 to 20 units per acre.

Land Use Element Table 2 describes the General Plan land use designations and development standards to be applied to the unincorporated areas of the City’s Planning Area. The following revisions to the existing land use requirements of the 1994 Land Use Element proposed for unincorporated areas of the City’s Planning Area are summarized below.

- The “Unincorporated Residential Rural” and “Unincorporated Residential Suburban” land use designations would be applied to largely subdivided areas within the unincorporated areas of the City’s planning area.
- The maximum residential unit density allowed under the “Unincorporated Residential Rural” designation would be changed from one unit/10 acres to one unit/20 acres or greater.
- The maximum residential unit density allowed under the “Unincorporated Residential Suburban” designation would be changed from one unit/acre to one unit/20 acres or greater.
- The “Unincorporated Agriculture and Open Space” land use designation is a new designation that would be applied to portions of the City’s unincorporated planning area that have not been extensively subdivided. The “Unincorporated Agriculture and Open Space” land use designation has a maximum residential unit density of one unit/20 acres or greater.

### 2.4.2. Growth Management Chapter

The Growth Management chapter provides policies and implementation programs that address a variety of development-related issues, including: methods to manage growth and protect land surrounding the city from urban development; maintenance of agriculture and open space in the City’s greenbelt; the potential for growth-related impacts from educational and government facilities located near but outside the city boundaries; the annexation of properties into the City; and the responsibility of new development to bear its fair share of the cost of required infrastructure.

An existing policy related to the rate of residential growth (existing Land Use Element Policy 1.10.2) indicates that the City shall manage the growth of the City’s housing supply so that it does not exceed one percent per year, excluding dwellings affordable to residents with extremely low, very low, or low incomes as defined by the Housing Element. This rate of growth may continue so long as the City's basic service capacity is assured. This existing policy is retained in the Land Use Element Update as Policy 1.9.3.
Figure 2.4-1
Proposed Land Use Diagram

Legend
- Proposed Land Use
  - Open Space
  - Agriculture
  - Park
  - Recreation
- Rural Residential
- Suburban Residential
- Low Density Residential
- Med Density Residential
- Med High Density Residential
- High Density Residential
- General Retail
- Community Commercial
- Tourist Commercial
- Neighborhood Commercial
- Business Park
- Services & Manufacturing
- Office
- Public
- Margarita Area Specific Plan
- Specific Plan

Source: City of San Luis Obispo, 2012

0 10.5 0 1
Miles

SLOGPU_Basemap_Regional_2012_07_26_JKC

2.0 Project Description
An existing policy related to the rate of non-residential growth (existing Land Use Element Policy 1.10.4) requires the City Council to annually evaluate the actual increase in non-residential floor area over the preceding five years. The Council shall consider establishing limits for the rate of nonresidential development if the increase in nonresidential floor area for any five-year period exceeds five percent. The requirements of this policy are not applicable to changes to existing businesses, the Downtown core, public agencies, manufacturing, light industrial or research businesses. This existing policy is retained in the Land Use Element Update as Policy 1.9.4 and is proposed to be updated to include “companies providing a significant number of head of household jobs”.

Most of the proposed revisions to the Growth Management chapter are intended to clarify policy language or to make policies and programs consistent with other sections of the updated Land Use Element. Substantive changes to existing policy language are summarized below.

- Proposed Policy 1.12.3 (Annexation of Cal Poly) indicates that the City should analyze the cost/benefits of annexing Cal Poly.

### 2.4.3. Conservation and Development of Residential Neighborhoods Chapter

This chapter provides policies and programs to protect and enhance the City’s neighborhoods. Policies in this chapter are intended to preserve the character of neighborhoods; identify uses that can be compatible in residential neighborhoods; describe transitions between residential and non-residential uses; promote connectivity between neighborhoods and to amenities and services; provide protection from cut-through traffic; and to provide standards for student housing and housing in the Downtown.

Most of the proposed revisions to this chapter clarify policy language or make policies and programs consistent with other sections of the updated Land Use Element. Substantive changes to existing policy language are summarized below.

- Proposed Policy 2.1.6 (Neighborhood Amenities) describes characteristics commonly associated with desirable neighborhoods.
- Proposed Policy 2.1.1 (Neighborhood Enhancement) indicates that the City will promote infill, redevelopment, rehabilitation and adaptive reuse projects that “contribute positively” to neighborhoods.
- Existing Policy 2.2.9 (Compatible Development) is substantially revised and identifies criteria to promote compatible development in neighborhoods.
- Proposed Policy 2.4.2 (Density Changes) provides required findings for proposed zone changes that increase density in residential areas.
- Proposed Policy 2.4.3 (Residential Conversion) provides standards for approving proposals to convert residential properties along major streets to office or commercial uses.
- Proposed Policy 2.7 (Reduced Automobile Dependence Downtown) indicates that the City will encourage housing in the Downtown area that minimizes the storage of vehicles in surrounding neighborhoods.

### 2.4.4. Commercial and Industrial Development Chapter

This chapter contains policies that provide direction on where to locate different types of non-residential uses. Most of the proposed revisions to the policies of this chapter clarify policy language, reflect existing land use conditions, or make policies consistent with other sections of the updated Land Use Element. Several new implementation programs have been added to this chapter to address the following:

- Design guidelines for transitions between residential and non-residential uses.
- A review of zoning regulations to consider allowing visitor-service uses in office zones adjacent to community commercial zones in the Downtown and the Monterey Street southwest of Johnson areas.
- The implementation of specified economic development programs.
2.4.5. Downtown Chapter

The Downtown chapter reaffirms policies and programs that recognize the Downtown Core as the community’s most densely developed urban center that is the focus of social, cultural, entertainment, and political activity. The policies in this chapter focus on maintaining an active commercial and pedestrian environment in the Downtown Core, encouraging new residential development, and protecting existing residential uses.

Most of the proposed revisions to this chapter clarify policy language or update policies to reflect existing land use regulations. Proposed policies and implementation programs for this chapter are summarized below.

- Three proposed policies address the mix of uses Downtown and include requiring civic buildings to incorporate commercial activity at the street level where appropriate; requiring the City to promote street-level businesses that emphasizes retail stores, specialty shops and food service rather than bars or taverns; and that the Downtown should remain the focus for nighttime entertainment, cultural events, and related activities.
- A new policy was added to increase green space and public parks in the Downtown as the number of people living Downtown increases.
- Proposed Program 4.0.24 (Updating Downtown Concept Plan) indicates that the City will update the Downtown Concept Plan to address changes affecting the Downtown area.
- Proposed Program 4.21.1 (Expansion of Downtown Plaza) indicates that the City will explore specified street modifications in the Mission Plaza area.
- A proposed program would modify zoning regulations to allow efficiency units and variable density development.
- Proposed programs identify a variety of measures to enhance and maintain a “safe and pleasant” late night environment in the Downtown core.
- A proposed program would require the preparation of a master plan for San Luis Obispo Creek in the downtown area.
- A proposed program requires the implementation of measures to attract a “desirable mix” of businesses to the Downtown area.
- A proposed program directs the City to update zoning regulations to incorporate evaluation criteria for bar/tavern, night clubs and late night drinking establishment permits.
- A proposed policy and associated implementation programs identify measures to implement safety and crime prevention measures in the Downtown core.

2.4.6. Public and Cultural Facilities Chapter

The purpose of this chapter is to provide policy direction regarding co-location of public or service uses; and to continue to encourage the collaboration of the City with its public partners to help meet the arts, government, and cultural needs of the community. Proposed revisions to the policies and programs of this chapter clarify policy language; provide updates to reflect current conditions (i.e. adding an additional health center area around Sierra Vista Hospital), or to make policies and programs consistent with other sections of the updated Land Use Element. One new program was proposed to direct the City to consider using incentives to facilitate establishment of social services facilities in the city.

2.4.7. Resource Protection Chapter

This chapter supports the Conservation and Open Space Element of the General Plan by providing land use policy direction for the continued existence of natural resources within the community. The policies provide guidance for hillside development; protection of sensitive habitats and unique resources; identification and protection for creeks and wetland areas; and direction for areas to protect as open space. Proposed revisions to the policies and programs of this chapter clarify policy language; provide updates to reflect current conditions, or to make policies and programs consistent with other sections of the updated Land Use Element. Proposed new policies and programs are summarized below.
Proper Policy 6.4.6 (Development Requirements) indicates that the City will encourage project designs that minimize drainage concentrations and impervious coverage, and avoid floodplain areas. Where feasible, any channelization shall be designed to provide the appearance of a natural water course.

• Proposed Policy 6.4.7 (Discharge of Urban Pollutants) requires appropriate runoff control measures as part of future development proposals to minimize discharge of urban pollutants.

• Proposed Policy 6.4.8 (Erosion Control Measures) requires the implementation of erosion control measures as part of new development to minimize sedimentation of streams and drainage channels.

• A proposed implementation program indicates that the City will evaluate the feasibility of establishing a financing district or districts to address flood concerns in affected areas.

2.4.8. Airport Area Chapter

The Airport Area chapter of the 1994 Land Use Element focused on the need to develop a specific plan for the airport. Since that time, the City adopted and is currently updating the Airport Area Specific Plan. Proposed changes to this chapter primarily clarify policy language, provide updates to reflect current conditions, or make policies and programs consistent with other sections of the updated Land Use Element. Proposed new policies and programs are summarized below.

• Policy language has been updated to reference the California Airport Land Use Planning Handbook guidelines and the Airport Master Plan forecasts as reasonably foreseeable projections of aviation activity sufficient for long-term land use planning.

• A proposed policy (Airport Safety Zones) indicates that designated Airport Safety Zones shall be consistent with California Airport Land Use Planning Handbook guidelines and be substantiated by the San Luis Obispo County Airport Master Plan activity forecasts as used for noise planning purposes.

• A proposed policy (Airport Noise Compatibility) requires that the aircraft noise analysis prepared for the Airport Master Plan Environmental Impact Report be used to assess the long-term noise impact of the airport’s aviation activity. The City shall use the 60 dB CNEL aircraft noise contour as the threshold for new urban residential areas. Interiors of new residential structures shall be constructed to meet a maximum 45 dB CNEL.

• A proposed implementation program (County Airport Land Use Plan) indicates that the City will continue to work with the County Airport Land Use Commission to achieve consistency between the County Airport Land Use Plan and the City’s General Plan. The proposed program also outlines measures to be implemented if consistency cannot be achieved.

• New programs have been added to codify airport compatibility criteria through creation of an airport overlay zone and associated standards in the zoning code, consistent with the purposes of the State Aeronautics Act. Standards include but are not limited to intensity and density limitations, allowed and prohibited uses, height limitations, buyer awareness requirements, airspace protection, and the process by which to evaluate airport compatibility.

The policy and program updates proposed in the Airport Chapter of the Land Use Element reflect airport safety, noise, airspace protection and overflight considerations consistent with the purposes of the State Aeronautics Act in order to preserve and enhance compatibility between airport activities and the land uses around the airport. Adoption of an overlay zoning ordinance is a way of codifying airport compatibility criteria identified only in concept in the general plan. Implementation of the compatibility policies would essentially be accomplished through the zoning ordinance. Consistent with this strategy, policies, programs, and Zoning Code implementation have been drafted to create an Airport Overlay Zone to codify airport compatibility criteria for areas subject to the airport influence area 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, secondary dwellings, identification of...
prohibited uses, infill development, height limitations, and other hazards to flight, maximum noise exposure, noise insulation requirements, buyer awareness measures, airspace protection, FAA notification requirements, nonconforming uses and reconstruction, open land requirements, and the process for airport compatibility criteria reviews by the City and ALUC.

2.4.9. Special Focus Areas Chapter

This chapter focuses on areas of the community identified for physical changes or where specific policy direction is needed. The chapter identifies two primary types of focus areas: four areas that require the preparation and approval of a specific plan; and 12 areas where policy guidance is needed but development potential or concerns are not so complex as to require a specific plan. Previously identified design areas where planning efforts are completed have been deleted from this chapter.

Specific Plan Areas. The City shall require the completion and approval of a specific plan, and where necessary a general plan amendment and annexation, prior to development of land within the areas designated as a Specific Plan Area on Figure 2.4-2. The Margarita Area (SP-1) would require an update to the existing specific plan prepared for that area. New specific plans would be required for the San Luis Ranch (SP-2) area, Madonna on Los Osos Valley Road (SP-3), and Avila Ranch (SP-4). All specific plans prepared for a designated Specific Plan Area must meet the requirements of state law and at minimum address each of the following items: land use classification; site planning and development standards; housing mix; design guidelines; circulation and parking; and infrastructure and public facilities.

Margarita Specific Plan Area (SP-1). This area encompasses about 420 acres in the southern portion of San Luis Obispo. The existing Specific Plan was adopted in 2004 and accommodates 868 residential units, a business park, neighborhood park, recreation facilities, and designated open space areas. Proposed Land Use Element Policy 8.3.2.3 states “the City shall consider this area as potentially appropriate to accommodate additional housing. Revisions to the Margarita Area Specific Plan will be required if residential development in excess of that accommodated in the plan is proposed.

San Luis Ranch Specific Plan Area (SP-2). This area is located in the southwest quarter of the City at the corner of Madonna Road and Dalidio Drive. The site is approximately 132 acres and is currently used for agricultural purposes. The entire site is within the City’s Planning Area, but is outside the current city limits. The specific plan requirements for this site address a variety of site planning issues, such as: site access and circulation; transit; agriculture preservation; flooding; and airport-related issues. A range of potential development parameters for this site as described by the proposed Land Use Element is summarized on Table 2.4-1.

Madonna on Los Osos Valley Road Specific Plan Area (SP-3). This site includes just over 111 acres and is located directly west of the intersection of Los Osos Valley Road and Calle Joaquin. The Specific Plan for this site will be required to address issues such as environmental constraints and resource protection, open space preservation, views from off-site locations, site and trail access, and the provision of residential development and commercial services. A range of potential development parameters for this site as described by the proposed Land Use Element is summarized on Table 2.4-1.

Avila Ranch Specific Plan Area (SP-4). This site encompasses approximately 150 acres and is located on the north side of Buckley Road at the far southern edge of the city. The entire site is located within the Airport Area Specific Plan. The Specific Plan for this site will be required to address issues such as, housing types and affordability, airport-related issues, buffers for agriculture and open space areas, access and circulation, water, waste water and fire protection infrastructure. A range of potential development parameters as described by the proposed Land Use Element is summarized below.
Figure 2.4-2
Specific Plan Areas

Legend
- Margarita Area Specific Plan
- LUCE SOI Planning Subarea
- Water Body
- Major Road
- City Limits
- Highway
- Street
- Railroad

Source: City of San Luis Obispo, 2012

June 2014
Table 2.4-1 Proposed Specific Plan Area Development Parameters

<table>
<thead>
<tr>
<th>Land Use</th>
<th>Development Parameters</th>
</tr>
</thead>
<tbody>
<tr>
<td>Residential</td>
<td>San Luis Ranch (SP-2)</td>
</tr>
<tr>
<td></td>
<td>Madonna on LOVR (SP-3)</td>
</tr>
<tr>
<td></td>
<td>Avila Ranch (SP-4)</td>
</tr>
<tr>
<td>Commercial</td>
<td>350-500 units</td>
</tr>
<tr>
<td></td>
<td>200-350 units</td>
</tr>
<tr>
<td></td>
<td>500-700 units</td>
</tr>
<tr>
<td>Office/High Tech</td>
<td>50,000-150,000 sq. ft.</td>
</tr>
<tr>
<td></td>
<td>50,000-350,000 sq. ft.</td>
</tr>
<tr>
<td></td>
<td>15,000-25,000 sq.ft.</td>
</tr>
<tr>
<td>Hotel</td>
<td>200 rooms</td>
</tr>
<tr>
<td></td>
<td>---</td>
</tr>
<tr>
<td>Parks</td>
<td>5.8 acres</td>
</tr>
<tr>
<td></td>
<td>---</td>
</tr>
<tr>
<td>Open Space/Ag</td>
<td>66 acres</td>
</tr>
<tr>
<td></td>
<td>55.5 acres (minimum)</td>
</tr>
<tr>
<td></td>
<td>75 acres (with potential for off-site)</td>
</tr>
</tbody>
</table>

*Source: Proposed LUCE Update*

**Proposed Land Use Element Development Special Planning Areas.** The intent of the Land Use Element Update process was to concentrate on the identification of specific locations within the LUCE SOI Planning Subarea that have the potential to accommodate changes in land use type or intensity. Most neighborhoods were identified as being “preserve and enhance” areas, indicating that changes would not be proposed relative to the existing General Plan Land Use Diagram. While the land use designations in most neighborhoods would not change, vacant lots could develop and enhancements and redevelopment of some properties could occur.

Other locations within the LUCE SOI Planning Subarea were considered throughout the public participation and Land Use Element development process as areas that may have the potential to accommodate changes to existing land use characteristics. In total, 19 proposed “physical alternative” sites were identified where changes to land use type and intensity characteristics were considered. Of the 19 identified sites, three were subsequently dropped from further consideration: the Nativity Church site, Pacheco Elementary site, and Diocese site. Policy guidance for an additional four sites is provided by proposed Land Use Element Update, however, no physical changes to existing land use type or intensity are proposed for those areas. These four areas are: the Upper Monterey area, Downtown, Mid-Higuera, and Margarita Specific Plan area. The remaining 12 proposed “physical alternative” locations include the other three specific plan locations: San Luis Ranch, Madonna at LOVR and Avila Ranch, which are described above. The nine remaining areas include:

- Foothill Blvd. at Santa Rosa area
- Caltrans site
- General Hospital area
- South Broad Street Area Plan area
- Sunset Drive-in
- Pacific Beach area
- Calle Joaquin Auto Sales area
- Los Osos Valley Road Creekside area
- Broad Street at Tank Farm Road
Figure 2.4-3 shows the location of the sites considered, and Table 2.4-2 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.

<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>Units</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</td>
</tr>
<tr>
<td></td>
<td>Consider mixed use for the area on both sides of Foothill between Chorro and Santa Rosa. Consider both horizontal and vertical mixed use. Emphasis on retail and housing. Policies to support consideration of parking and height 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 proposed</td>
</tr>
<tr>
<td></td>
<td>No physical land use changes proposed.</td>
<td>--</td>
</tr>
<tr>
<td>F</td>
<td>Downtown Area</td>
<td>No land use changes proposed</td>
</tr>
<tr>
<td></td>
<td>No physical land use changes proposed.</td>
<td>--</td>
</tr>
<tr>
<td>G</td>
<td>Mid-Higuera Area</td>
<td>No land use changes proposed</td>
</tr>
<tr>
<td></td>
<td>No physical land use changes proposed.</td>
<td>--</td>
</tr>
<tr>
<td>H</td>
<td>Caltrans Site</td>
<td>53</td>
</tr>
<tr>
<td></td>
<td>Mixed use to include tourist commercial, office and some residential. Site may be appropriate to review height limit changes to accommodate desired development. Consider more public open space uses to serve as gateway and uses compatible with conference facilities.</td>
<td></td>
</tr>
</tbody>
</table>
### Site Description

<table>
<thead>
<tr>
<th>Site Letter</th>
<th>Site Description</th>
<th>Capacity</th>
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</thead>
<tbody>
<tr>
<td>I</td>
<td>General Hospital Site</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Residential development on the site behind existing structure within the existing Urban Reserve Line. Outside the Urban Reserve Line, retain the current designation of Open Space. Policies should support flexibility so that a range of residential uses can be considered (i.e. residential care, adjunct to transitional care use, other residential uses consistent with area) within the residential land use designations.</td>
<td></td>
</tr>
<tr>
<td>J</td>
<td>Broad Street Area</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Incorporate physical alternative described in South Broad Street Area Plan endorsed on September 17, 2013 by City Council (Council Resolution 10460).</td>
<td></td>
</tr>
<tr>
<td>K</td>
<td>Sunset Drive-In/Prado Road Site</td>
<td></td>
</tr>
<tr>
<td></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>
<td></td>
</tr>
<tr>
<td>L</td>
<td>San Luis Ranch Specific Plan Area</td>
<td></td>
</tr>
<tr>
<td></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>
<td></td>
</tr>
<tr>
<td>M</td>
<td>Pacific Beach Site</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Policy development to support consideration of Commercial Retail/mixed use fronting LOVR and Froom Ranch and park to serve neighborhood.</td>
<td></td>
</tr>
<tr>
<td>N</td>
<td>Calle Joaquin Auto Sales Area</td>
<td></td>
</tr>
<tr>
<td></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>
<td></td>
</tr>
<tr>
<td>Site Letter</td>
<td>Site Description</td>
<td>Capacity</td>
</tr>
<tr>
<td>-------------</td>
<td>----------------------------------------------------------------------------------</td>
<td>---------------------------------</td>
</tr>
<tr>
<td>O</td>
<td>Madonna Specific Plan Area</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Future development to consider viewsheds, hillside and open space protection,</td>
<td>115</td>
</tr>
<tr>
<td></td>
<td>height limits, wetland protection, access to other connections, historic farm</td>
<td>263</td>
</tr>
<tr>
<td></td>
<td>buildings, mixed use to accommodate workforce housing, and neighborhood</td>
<td>336,170</td>
</tr>
<tr>
<td></td>
<td>commercial type uses.</td>
<td>558</td>
</tr>
<tr>
<td>P</td>
<td>LOVR Creekside Area</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Consideration of medium high density</td>
<td>159</td>
</tr>
<tr>
<td></td>
<td>residential infill housing with open space.</td>
<td>364</td>
</tr>
<tr>
<td></td>
<td></td>
<td>0</td>
</tr>
<tr>
<td></td>
<td></td>
<td>0</td>
</tr>
<tr>
<td>Q</td>
<td>Margarita Specific Plan</td>
<td></td>
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<tr>
<td></td>
<td>Policy to support consideration of changes to the previously approved Specific</td>
<td>No land use changes proposed</td>
</tr>
<tr>
<td></td>
<td>Plan to allow increased density on eastern portion of specific plan site.</td>
<td>No land use changes proposed</td>
</tr>
<tr>
<td></td>
<td></td>
<td>No land use changes proposed</td>
</tr>
<tr>
<td></td>
<td></td>
<td>No land use changes proposed</td>
</tr>
<tr>
<td>R</td>
<td>Broad St. @ Tank Farm Rd. Site</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Consideration of a mix of commercial uses with limited residential on upper</td>
<td>41</td>
</tr>
<tr>
<td></td>
<td>floors. Commercial uses should serve the surrounding businesses and bicycle and</td>
<td>94</td>
</tr>
<tr>
<td></td>
<td>pedestrian connectivity must be addressed.</td>
<td>135,906</td>
</tr>
<tr>
<td></td>
<td></td>
<td>358</td>
</tr>
<tr>
<td>S</td>
<td>Avila Ranch Specific Plan Area</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Consider a mix of residential densities, connections to shops to the north,</td>
<td>700</td>
</tr>
<tr>
<td></td>
<td>connection to S. Higuera and a mix of uses. Respect creek/wildlife corridor.</td>
<td>1,603</td>
</tr>
<tr>
<td></td>
<td></td>
<td>25,000</td>
</tr>
<tr>
<td></td>
<td></td>
<td>45</td>
</tr>
</tbody>
</table>
2.0 Project Description

Figure 2.4-3

Legend

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

Source: City of San Luis Obispo, 2012
Other Special Planning Areas. The Special Planning Areas identified by the Land Use Element update are areas that present opportunities to develop customized land use approaches or special design implementation to enhance their appearance and achieve their respective development potential. Most of these sites are included as Sites A—S, as described earlier. In addition to these sites, the following additional areas were described from a policy standpoint on future development potential as part of Section 8.3.3 in the Land Use Element update.

- Madonna Inn area. Land uses that may be considered in this area include tourist-serving and senior living facilities.
- Cal Fire/Cal Poly-Owned Property on Highway 1. No potential land uses in this area have been identified.
- Bishop Knoll. Residential uses at a density of approximately seven units/acre may be considered in this area.
- Alrita Properties. Residential uses at a density of approximately seven units/acre may be considered in this area.

South Broad Street Area. Development area “J” on Table 2.4-2 identifies the Broad Street area and would implement the South Broad Street Area Plan, which was endorsed for inclusion in the LUCE update by the City Council in 2013.

The South Broad Street neighborhood encompasses approximately 86 acres and is bounded by the Broad Street on the west, the Union Pacific Railroad on the east, High Street to the north, and Orcutt Road to the south. Planning objectives of the South Broad Street Area Plan are to:

- Reduce traffic congestion
- Increase safety for biking and walking
- Maintain and foster neighborhood identity
- Emphasize affordable housing

The South Broad Street Area Plan consists of five major chapters. The Street Types chapter defines development according to street types that are oriented for traffic patterns, transportation modes and land uses. The Zoning chapter establishes allowable land uses according to updated land use designations and zoning for the area (changing from primarily Commercial Service and Manufacturing to Commercial Retail and Commercial Service). The Development Standards chapter addresses site planning and building form associated with the primary street types. The Design Guidelines chapter provides guidance on architectural building styles and other details including walls, roofs, openings, entries, walls, and railings. The Streetscape Standards chapter provides standards that address the public right-of-way and the design of public improvements.

2.4.10. Sustainability Chapter

The Sustainability chapter is a new addition to the Land Use Element and is proposed to address Strategic Growth Council grant objectives and to reference policies from the City’s adopted Climate Action Plan. Proposed policies in the chapter are summarized below.

- Proposed Policy 9.3.1 (Introduction) indicates that the City will take a leadership role in the development of sustainable plans and programs to guide future development.
- Proposed Policy 9.3.2 (Regional Coordination) indicates that the City will work with SLOCOG to develop and update the Sustainable Communities Strategy as part of the Regional Transportation Planning process.
- Proposed Policy 9.3.3 (Sustainability Coordination) states that the City will review SLOCOG’s Regional Transportation Plan, including the Sustainable Communities Strategy, as it prepares and reviews updates to the General Plan and other planning programs in regard to consistency with infrastructure, and eligibility for State transportation funding.
- Proposed Policy 9.3.4 (Climate Action Plan) requires the City to maintain and implement its Climate Action Plan.
2.0 Project Description

- Proposed Policy 9.3.5 (Urban Heat Effects) indicates that the City will implement various measures to reduce heat effects.
- Proposed Policy 9.3.6 (Natural Areas and Green Space) indicates that the City will continue to maintain and expand natural areas in and around the city to foster carbon sequestration while providing more open space for residents.
- Proposed Policy 9.3.7 (Sustainable Design) indicates that the City will implement a variety of sustainable building practices.
- Proposed Policy 9.3.8 (Sustainable Infrastructure) indicates that the City will promote infrastructure expansion where it will be more efficient and effective not promote growth inducement outside the urban reserve line, and focus infrastructure improvements in designated growth areas and contiguous to existing development.
- Proposed Policy 9.3.9 (Renew the Urban Forest) indicates the City will develop a long term tree planting program to combat air pollution and global climate change.
- Seven new programs have been proposed to implement the policies listed above.

2.4.11. Healthy Community Chapter

The Healthy Community chapter is a new addition to the Land Use Element and is proposed to address Strategic Growth Council grant objectives and to provide health-related policies. Proposed new policies and programs are summarized below.

- Proposed Policy 10.3.1 (Neighborhood Access) indicates that residences should be close to food outlets such as grocery stores, farmers markets, and community gardens.
- Proposed Policy 10.3.2 (Local Food Systems) states that the City will support sustainable local food systems.
- Proposed Policy 10.3.3 (Provide for Community Gardens) indicates that the City will continue to support the development of community gardens.
- Proposed Policy 10.3.4 (Encouraging Walkability) indicates that the City will encourage projects to promote environmentally sustainable modes of transportation, such as pedestrian movement, bicycle access, and transit services.
- Proposed Policy 10.3.5 (Healthy Environment) states that the City will protect and maintain clear air and natural open spaces.

2.4.12. Review and Amendment Chapter

This chapter addresses how often the City should review and update the General Plan and describes what is contained in the annual report to the City Council. Only minor grammatical edits are proposed for this chapter.

2.4.13. Implementation Chapter

This chapter describes the ways the City implements the General Plan, such as through zoning and subdivision regulations, guidelines, ordinances, and financing of capital improvements. The edits proposed for this chapter update references to Community Design Guidelines, include new references to historic preservation implementation that was not in place when the Land Use Element was updated in 1994, and to reconfirm the City’s commitment to public planning and environmental review.
2.4.14. **Land Use Element Buildout Assumptions**

The Land Use Element describes the type, intensity, and location of existing and future land uses in and near the city and also describes the expected level of population growth resulting from construction of the types of housing units identified by the Element. The Land Use Element also identifies the new commercial and industrial development that is responsive to the City's economic needs. Estimates of future development and population conditions in the City are based on existing conditions, the development of previously approved projects and specific plans, potential new development that could occur primarily on vacant or under-utilized land, and development that could occur as a result of proposed changes to the Land Use Element. Estimates of future development and population in the City will also be influenced by a variety of external factors. These factors may include future economic and market conditions, infrastructure availability, and the availability of land suitable for development.

Potential future development capacity within the Land Use Element Planning Subarea is summarized on Table 2.4-3. Estimates of future development in the City reflect reasonable assumptions regarding a variety of factors, such as land use designation requirements, development standards, existing development conditions, and the adopted and proposed performance standards for existing and proposed specific plan areas. 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.

**South Broad Street Area Plan**

The South Broad Street Area Plan provides additional guidance regarding potential buildout conditions in that planning area. Table 2.4-4 depicts estimates of the future development capacity in the Broad Street area based on the land use requirements of the proposed South Broad Street Area Plan. The buildout estimates provided on Table 2.4-4 are a subset of the total Land Use Element buildout estimates provided on Table 2.4-3.
<table>
<thead>
<tr>
<th>Potential Development Sites²</th>
<th>Acres</th>
<th>Residential (Units/Acre)</th>
<th>Non-Residential (FAR)</th>
<th>Typical Density¹</th>
<th>Units²</th>
<th>Population³</th>
<th>Non-Residential Square Footage⁴</th>
<th>Capacity</th>
<th>Employment⁵</th>
</tr>
</thead>
<tbody>
<tr>
<td>Foothill @ Santa Rosa Area</td>
<td>0</td>
<td>80</td>
<td>80</td>
<td>183</td>
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<td>-1,814</td>
<td>0</td>
<td>Office</td>
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<td>48,788</td>
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<td>0</td>
<td>0</td>
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<tr>
<td>Broad Street Area</td>
<td>0</td>
<td>589</td>
<td>589</td>
<td>1,349</td>
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<td>229,068</td>
<td>0</td>
<td>0</td>
<td>416</td>
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<tr>
<td>Sunset Drive-In Site</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>260,706</td>
<td>222,962</td>
<td>0</td>
<td>0</td>
<td>1,274</td>
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<tr>
<td>Dalidio / Madonna Area</td>
<td>320</td>
<td>180</td>
<td>500</td>
<td>1,145</td>
<td>150,000</td>
<td>200,000</td>
<td>0</td>
<td>200</td>
<td>968</td>
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<tr>
<td>Pacific Beach Site</td>
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<td>38</td>
<td>87</td>
<td>-94,851</td>
<td>57,499</td>
<td>0</td>
<td>0</td>
<td>-212</td>
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<tr>
<td>Calle Joaquin Auto Sales Area</td>
<td>0</td>
<td>0</td>
<td>0</td>
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<td>128,066</td>
<td>0</td>
<td>0</td>
<td>295</td>
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<tr>
<td>Madonna Site on LOVR</td>
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<td>115</td>
<td>115</td>
<td>263</td>
<td>16,770</td>
<td>236,000</td>
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<td>159</td>
<td>364</td>
<td>0</td>
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<td>0</td>
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<td>0</td>
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<tr>
<td>Broad St. @ Tank Farm Rd. Site</td>
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<td>41</td>
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<td>73,180</td>
<td>62,726</td>
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<td>358</td>
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<td>Avila Ranch</td>
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<td>Subtotal</td>
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<td>1,582</td>
<td>2,316</td>
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<td>450,801</td>
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<td>Margarita Area Specific Plan</td>
<td>Single Family</td>
<td>Multifamily</td>
<td>Total</td>
<td>Population</td>
<td>Office</td>
<td>Commercial</td>
<td>Industrial</td>
<td>Hotel</td>
<td>Park (Acres)</td>
</tr>
<tr>
<td>------------------------------</td>
<td>--------------</td>
<td>------------</td>
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<td>--------</td>
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<td>-----------</td>
<td>------</td>
<td>-------------</td>
</tr>
<tr>
<td>Acres</td>
<td>741</td>
<td>127</td>
<td>868</td>
<td>1,988</td>
<td>959,017</td>
<td>10,000</td>
<td>0</td>
<td>0</td>
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<td>Non-Residential (FAR)</td>
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<td></td>
<td></td>
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<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Typical Density¹</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Capacity</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

| Airport Area Specific Plan   | 0            | 0          | 0      | 0          | 427,191| 616,983   | 747,642   | 0    | -           | 1,791,815                | 3,543      |
| Orcutt Area Specific Plan    | 540          | 439        | 979    | 2,242      | 0      | 11,000    | 0         | 0    | 12.0        | 11,000                   | 20         |

| Subtotal                     | 1,281        | 566        | 1,847  | 4,230      | 1,386,208| 637,983   | 747,642   | 0    | 37.9        | 2,771,832                | 6,778      |

<table>
<thead>
<tr>
<th>Previously Approved Specific Plans⁷</th>
</tr>
</thead>
</table>

| Chinatown Project                  | 0            | 32         | 32      | 73         | 0        | 46,000    | 0         | 78   | -           | 46,000                   | 124        |
| Pacific Courtyards                 | 0            | 12         | 12      | 27         | 10,000   | 0         | 0         | 0    | -           | 10,000                   | 33         |
| Mission Estates                    | 10           | 0          | 10      | 23         | 0        | 0         | 0         | 0    | -           | 0                       | 0          |

| Planned and Approved Projects⁹     |

| Four Creeks (Creekston and Laurel Creek) | 0            | 166        | 166     | 380        | 0        | 0         | 0         | 0    | -           | 0                       | 0          |
| Garden Street Terrace              | 0            | 8          | 8       | 18         | 0        | 25,000    | 0         | 72   | -           | 25,000                   | 83         |
| 313 South Street Apartments        | 0            | 43         | 43      | 98         | 0        | 0         | 0         | 0    | -           | 0                       | 0          |
| Marsh Street Commons               | 0            | 11         | 11      | 25         | 0        | 3,000     | 0         | 0    | -           | 3,000                   | 5          |
| ICON project (1340 Taft)           | 0            | 7          | 7       | 16         | 0        | 4,000     | 0         | 0    | -           | 4,000                   | 7          |

<p>| Subtotal                          | 10           | 279        | 289     | 660        | 10,000   | 78,000    | -         | 150  | -           | 88,000                   | 252        |</p>
<table>
<thead>
<tr>
<th>Other Vacant Land (by General Plan Designation)¹³⁰</th>
<th>Acres</th>
<th>Residential (Units/Acre)</th>
<th>Non-Residential (FAR)</th>
<th>Capacity</th>
<th>Non-Residential Square Footage⁴</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Suburban Residential⁴</td>
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<td>4</td>
<td>4</td>
<td>9</td>
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<tr>
<td>Low Density Residential</td>
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<td>320</td>
<td>733</td>
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<tr>
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<td>71</td>
<td>71</td>
<td>163</td>
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<tr>
<td>Medium-High Density Residential</td>
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<td>16</td>
<td>-</td>
<td>6</td>
<td>6</td>
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<tr>
<td>High Density Residential</td>
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<td>19</td>
<td>-</td>
<td>51</td>
<td>51</td>
</tr>
<tr>
<td>Neighborhood Commercial⁵</td>
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<td>0.30</td>
<td>-</td>
<td>2,614</td>
<td>-</td>
</tr>
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<td>Community Commercial⁵</td>
<td>3.2</td>
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<td>-</td>
<td>41,818</td>
<td>-</td>
</tr>
<tr>
<td>Tourist Commercial⁵</td>
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<td>0.35</td>
<td>-</td>
<td>15,246</td>
<td>-</td>
</tr>
<tr>
<td>Office⁴</td>
<td>1.3</td>
<td>0.35</td>
<td>-</td>
<td>19,820</td>
<td>-</td>
</tr>
<tr>
<td>Services and Manufacturing</td>
<td>13.3</td>
<td>0.25</td>
<td>-</td>
<td>144,837</td>
<td>-</td>
</tr>
<tr>
<td>Public</td>
<td>0.4</td>
<td>0.35</td>
<td>-</td>
<td>6,098</td>
<td>-</td>
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<td>Subtotal</td>
<td>87</td>
<td>395</td>
<td>57</td>
<td>452</td>
<td>1,036</td>
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<tr>
<td>Total Capacity</td>
<td>2,420</td>
<td>2,484</td>
<td>4,904</td>
<td>11,229</td>
<td>1,872,927</td>
</tr>
</tbody>
</table>

Source: Matrix, 2014

¹ Typical density and FAR is based on a net acre assumption accounting for necessary infrastructure and facilities. To get the typical density, the maximum density was recalculated based on a development percent assumption on what is average for new development.

² Unit capacity for other vacant land is calculated by multiplying acres and the typical density.

³ Population based on 2010 Census estimate of 2.29 persons per household.

⁴ 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 calculated by multiplying acres and the typical FAR.

⁵ Employment is estimated using 550 non-residential square feet per job.
Alternatives Sites estimate the net new residential and non-residential development in opportunity areas identified as a part of the alternatives process. Units and non-residential square footage are calculated based on proposed general plan designations and input from the City. Some of these sites have existing development that will likely be adapted to facilitate new development. As a result, some sites have a negative number for net new non-residential square footage, even though new development is anticipated.

Non-Residential square footage includes land designated neighborhood commercial, services commercial, business park, and manufacturing.

The Airport Area Specific Plan (AASP) does not include capacity from the Avila Ranch or Broad St. @ Tank Farm Alternatives Sites. These sites are counted in the Alternatives Sites section. Non-residential square footage in the AASP includes 605,293 square feet from underutilized land that is likely to redevelop. Remaining capacity in the AASP based on analysis conducted by the City of San Luis Obispo Planning and GIS staff.

Does not include projects that fall within the boundaries of the Specific Plan Areas or the Alternatives Sites. Only those projects that provided specific unit/square footage numbers were included.

Does not include parcels that fall within the boundaries of the Specific Plan Areas, Alternatives Sites, or Planned and Approved Projects. Acreages are taken from the vacant land category in the existing land use inventory.

Sources: Community Development Department Project Status Report (December 31, 2012), San Luis Obispo General Plan, Land Use Element, 2010; City of San Luis Obispo, 2014; Matrix, 2014; Mintier Harnish, 2014.

Table 2.4-4 South Broad Street Area Development Characteristics

<table>
<thead>
<tr>
<th>Acres</th>
<th>Units</th>
<th>Non-Residential Square Footage</th>
<th>Employment</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Single Family</td>
<td>Multifamily</td>
<td>Total</td>
</tr>
<tr>
<td>South Broad Street Plan</td>
<td>86</td>
<td>0</td>
<td>589</td>
</tr>
</tbody>
</table>

Source: General Plan Background Report, 2014
2.5. Updated Circulation Element

The proposed Circulation Element Update retains the basic structure of the 1994 Element and adds a new Multi-Modal Circulation chapter. The Traffic Flow chapter included in the 1994 Circulation Element was deleted because concepts included in that chapter are now addressed in other Circulation Element sections. The general content of and proposed revisions to each chapter of the updated Circulation Element are summarized below. The full text of updated Circulation Element text, policies and programs is incorporated into the EIR by reference and can be reviewed at the City of San Luis Obispo Community Development Department, located at 919 Palm Street, during normal business hours. The full text of the updated Circulation Element may also be obtained at:

http://www.slo2035.com

2.5.1. Introduction Chapter

This chapter describes the purpose and history of the City’s circulation planning efforts and provides goals and objectives regarding circulation in the community, including transportation mode split objectives. Proposed changes to this chapter primarily clarify existing language and to make goals and objectives consistent with other sections of the updated Circulation Element. One new goal was added to support a circulation system that balances the needs of all circulation modes. In addition, new mode split objectives were identified that reduce mode share for automobiles and increase bicycle, walking and transit mode shares.

2.5.2. Traffic Reduction Chapter

This chapter 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. Most of the proposed revisions to this chapter clarify existing policy language or make policies and programs consistent with other sections of the updated Circulation Element. One new traffic reduction program has been proposed.

- Proposed Program 2.1.4 (Incentives for Educational Institutions) 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.

2.5.3. Transit Service Chapter

The purpose of this chapter is to provide policies and programs to support and enhance transit service in the City. The policies and programs include meeting the needs of different populations, identifying service goals to increase ridership, increasing the convenience of transit, and working with regional partners to provide transit connections to and from the community. Proposed revisions to this chapter generally clarify existing policy language or reflect existing conditions. Two new transit programs have been proposed.

- Proposed Program 3.1.7 (Regional Transit Center) indicates that the City will shall work with other agencies to develop a regional transit center Downtown.

2.5.4. Bicycle Transportation Chapter

This chapter provides policies and programs to support the provision of bicycle facilities and a network of connections to serve riders of all ability levels. Proposed revisions to existing policies generally clarify existing language. Proposed new policies and programs are summarized below.

- Proposed Policy 4.0.2 (Campus and School Site Trips) indicates that the City will encourage the use of bicycles by students and staff traveling to local educational facilities.

- Proposed Policy 4.0.3 indicates that the City will collaborate with SLO County to coordinate planning and development of county bikeways to support a regional bike network and identify and acquire additional rights of way within the City as they become available.
Draft LUCE Program EIR

- Proposed Policy 4.0.7 (Education and Safety) indicates that the City will support education and safety programs aimed all cyclists and motorists.

- Proposed Policy 4.0.8(Bicycle Transportation Coordinator) indicates that the City will support the allocation of staff and resources to implement the bicycle transportation plan policies and programs.

- Proposed Policy 4.0.9 (Traffic Law Compliance) indicates that the City will continue to seek compliance with its traffic laws through enforcement and education.

- Proposed Policy 4.0.10 (ROW acquisition) indicates the City will pursue rights-of-way needed to implement the Bicycle Transportation Plan.

- Proposed Policy 4.0.11 (Bicycle Transportation Plan Implementation) indicates that the City will support allocation of staff and resources to coordinate and implement bicycle transportation policies and programs.

- Proposed Policy 4.0.12 (Bike Parking) indicates that the City will facilitate development of conveniently located bike parking.

- Proposed Program 4.1.3 (Campus Coordination) directs the City to consider the Cal Poly and Cuesta College master plans to better coordinate the planning and implementation of safe and convenient bicycle access and facilities to local college campuses.

- Proposed Program 4.1.7 (Bicycle Friendly Community) directs the City to maintain its silver level award designation as a Bicycle Friendly Community and pursue a gold level designation.

- Proposed Program directs the City to consider expansion of bicycle licensing program to address loss, theft, and safety problems.

- Proposed Program directs the City to consider expansion of bicycle licensing program to address loss, theft, and safety problems.

2.5.5. **Walking Chapter**

The purpose of this chapter is to provide guidance to ensure that pedestrians are served by adequate facilities, to make walking a comfortable circulation mode choice, and to provide a network of connections to ensure that pedestrians can get to desired destinations. Proposed revisions to existing policies generally clarify existing language. Proposed new policies and programs are summarized below.

- Proposed Policy 5.0.6 (Downtown) indicates that the City will require that pedestrian facilities in the downtown be designed in accordance with the Downtown Pedestrian Plan design guidelines to allow a clear path of travel and include conveniently located rest areas with shade and seating.

- Proposed Policy 5.0.7 (Sidewalks) indicates that the City, as allowed by the American with Disabilities Act, will consider neighborhood characteristics, such as topography, street design, existing density, and connectivity when identifying and prioritizing the installation of sidewalks.

- Proposed Program 5.1.5 (Consolidated Bicycle and Pedestrian Plan) states that the City will consider the benefits and costs of consolidating the Bicycle Transportation Plan with a city-wide Pedestrian Plan.
2.5.6.  Multi-Modal Circulation Chapter

This new Circulation Element chapter establishes both minimum and desired levels of service standards for the various modes of travel. The policies set thresholds of performance that new development are to implement if specified service levels are exceeded. The chapter also identifies mode priorities for different areas of the City. For example, in the Downtown core, pedestrians and bicyclists are a higher priority than vehicles; while on arterials and highways, vehicles and transit are prioritized over pedestrians and bicyclists. Proposed multi-modal circulation policies and programs are summarized below.

- 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.
- Proposed Policy 6.0.D (Defining Significant Circulation Impact) indicates that any degradation in level of service shall be minimized to the extent feasible in accordance with the modal priorities established in Policy 6.0.C.
- Proposed Policy 6.0.E (Mitigation) requires that development resulting in significant impacts as described by proposed Policy 6.0.D shall be responsible for their fair-share of required improvements. Examples of possible types of pedestrian-, bicycle-, and transit-related improvements that may be implemented are described by this policy.
- Proposed Policy 6.0.F (City Review) requires that when new projects impact the existing circulation system, the City will review the effectiveness and desirability of “direct fix” mitigation improvements. Other possible mitigation approaches are also provided by this policy.
- A proposed Program indicates that as funding allows, the City will biennially complete a traffic count program for pedestrians, bikes, vehicles, and transit modes of travel.

2.5.7.  Traffic Management Chapter

This chapter provides guidance for expected levels of service on roads; provides solutions for areas experiencing high levels of traffic; and provides street design standards and classifications. Proposed new policies and programs included in this section are summarized below.

- Proposed Policy 7.0.3 (Growth Management & Roadway Expansion) indicates that the City will manage the expansion of roadways to keep pace with only the level of increased vehicle traffic associated with development planned for by the Land Use Element; the City’s growth management policies; and regional transportation plans.
- Proposed Policy 7.0.4 (Transportation Funding) indicates that the City will strive to allocate transportation funding across various modes approximately proportional to the modal split objectives.
- Proposed Policy 7.0.5 (Vehicle Speeds) indicates that to the extent permitted by the California Vehicle Code, the City will endeavor to maintain and reduce speeds in residential neighborhoods.
- Proposed Program 7.1.1 (Traffic Reduction Priority) indicates that traffic programs identified in the Circulation Element that have the greatest potential to reduce traffic increases shall have implementation priority.
- Proposed Program 7.1.2 (Transportation Monitoring) indicates that the City will monitor changes in traffic volumes, changes in level of service on specified roadways, traffic speeds, changes in the use of bicycle and pedestrian facilities, changes in streetscape features, and accident data.
Proposed Program 7.1.7 (Traffic Access Management) requires the City to adopt an access management policy that controls the location, spacing, design, and operation of specified roadway design features.

Proposed significant revision to Program 7.1.9 directs the City to adopt fiscal implementation guidelines to address new policy 7.0.4 and how the City will address the “approximately proportional” goal of funding for mode share objectives as part of the 2015-2017 Financial Plan.

Policy 7.2 (Design Standards) requires that improvements to the City’s roadway system comply with specified descriptions and standards.

2.5.8. Neighborhood Traffic Management Chapter

This chapter supports community-wide traffic management with a focus on impacts to residential neighborhoods. Proposed policies included in this chapter are summarized below.

- Proposed Policy 8.0.3 (Neighborhood Traffic Speeds) states that to the extent permitted by the California Vehicle Code, the City will endeavor to reduce and maintain vehicular speeds in residential neighborhoods.

- Proposed Policy 8.0.5 (Neighborhood Traffic Management Guidelines) indicates that the City will update its Neighborhood Traffic Management Guidelines.

- Proposed Policy 8.0.6 (Non-Infill Development) indicates that for new, non-infill developments, dwellings shall be set back from specified types of roadways so that interior and exterior noise standards can be met without the use of noise walls.

- A proposed Policy indicates that the City will not approve development that impacts the quality of life and livability of residential neighborhoods by generating traffic conditions that significantly exceed the thresholds established except as provided under CEQA. The City shall also not approve development that further worsens already deficient residential neighborhood traffic conditions as established in the Circulation Element. New development shall incorporate traffic calming features to minimize speeding and cut-through traffic.

2.5.9. Street Network Changes Chapter

The purpose of this chapter is to identify how and when street network changes are appropriate. The policies and programs emphasize public participation and advance planning through identification of setback lines and other means to ensure that future needs for right-of-way is accommodated in the planning process. Proposed changes to this chapter are generally minor changes and additions to existing policies.

Table 2.3-5 lists the 19 “physical alternative” street network modifications identified by the Circulation Element Update public participation and Element preparation process. Of the 19 listed, 17 remained in consideration for the Proposed Project. The numeric designation for each modification location is included on Table 2.5-1 and is used on Figure 2.5-1 to identify the location of each site.
## 2.0 Project Description

### Table 2.5-1  Circulation Element Planning Subarea Proposed Street Network Changes

<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. Include 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          | **Connections to Dalidio Dr. from Froom Ranch Way and/or Calle Joaquin**  
*Removed from consideration (not part of proposed project or EIR alternatives)* |
| 17          | **Realign Vachel Ln.**  
*Removed from consideration (not part of proposed project or EIR alternatives)* |
| 18          | **North-South Connection between Tank Farm Rd. and Buckley Rd.**  
Consideration creating a north-south connection between Tank Farm and Buckley for future connectivity. |
| 19          | **Buckley Rd. to LOVR Connections**  
Consider (Buckley to Higuera connection and Higuera to LOVR behind Los Verdes - 101 bypass. |
2.5.10. **Truck Transportation Chapter**
This chapter provides policies and programs that describe how the City manages delivery services so that problems associated with truck transportation are minimized. Proposed minor changes to this chapter address Vehicle Code provisions that limit actions the City is able to take in directing truck traffic.

2.5.11. **Air Transportation Chapter**
This chapter provides policies and programs related to providing increased air service to the community; improving transit service to the airport; working with the County Airport to develop airport facilities; and to encourage the use of quieter and more environmentally sensitive aircraft. New policies and programs proposed for this chapter are summarized below.

- Proposed Policy 11.0.1 (Interstate Air Service) indicates the City will support and encourage the expansion of air transportation services.
- Proposed Program 11.1.2 (Airport Facilities Development) states that the City will work with the County Airport to support the development of airport facilities and attract additional passenger airline services.
- Proposed Program 11.1.3 (Airport Funding) directs the City to work with the County Airport to pursue funding opportunities such as Airport Improvement Program grants.

2.5.12. **Rail Transportation Chapter**
This chapter provides policies and programs that support rail transportation as an energy efficient and convenient connection for both passenger travel and freight delivery. Only minor edits are proposed for this chapter. One new program is proposed for the City to work with the Air Pollution Control District and others to eliminate idling train engines in the City.

2.5.13. **Parking Management Chapter**
This chapter provides policies and programs related to the management the parking needs of non-residential uses. The policies and programs address structured parking as well as curb parking and park-and-ride lots. Proposed revisions to this chapter clarify policy language or make policies and programs consistent with other sections of the updated Circulation Element.

2.5.14 **Neighborhood Parking Management Chapter**
This chapter provides policies and programs that address the parking needs of residential areas. New policies proposed for this chapter are summarized below.

- A proposed policy (Neighborhood Protection) requires that neighborhoods be protected from spill-over parking from adjacent high intensity uses.
- A proposed policy (Neighborhood Parking District) indicates that the City’s Residential Parking District Program shall be updated to review the criteria and process for establishing a district.

2.5.15. **Scenic Roadways Chapter**
The purpose of this chapter is to provide guidance regarding the importance of roads in providing access to scenic views. Policies and programs are provided related to development along scenic routes and the aesthetic quality of circulation infrastructure. Proposed revisions to this chapter clarify policy language or make policies and programs consistent with other sections of the updated Circulation Element, the General Plan, and other requirements of the City.
2.5.16 Circulation Element Implementation, Program Funding and Management Chapter

The purpose of this chapter is to recognize the City’s partnership with other agencies related to the funding of circulation improvements, as well as to identify priorities and methods for implementing circulation programs. Proposed policy and program revisions emphasize the relationship between funding amounts and desired outcomes for mode share. Two proposed policies have been added to the chapter:

- Proposed Policy 16.0.1 (City and Regional Growth) indicates that the City will continue to be an active member of SLOCOG’s regional board to address regional transportation issues in San Luis Obispo County.
- Proposed policy to encourage SLOCOG to consider initiating a county-wide revenue measure devoted to local transportation funding on the basis of population so that SLO County becomes a “self-help” county.

2.6. Project Objectives

2.6.1. Land Use Element

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.

2.6.2. Circulation Element

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 balances the needs of all circulation modes.

2.7. Discretionary Actions

The San Luis Obispo City Council is the Lead Agency for the Land Use and Circulation Element Update Project and is responsible for complying with the requirements of CEQA. The City Council will be the decision-making body for the Project.

This EIR will provide information to the City and the San Luis Obispo County Local Agency Formation Commission (LAFCO) regarding any future annexations that may be proposed in response to the land use policies of the Land Use and Circulation Element Update. It is anticipated that Caltrans will use the EIR and General Plan to assist in that agency’s long-range forecasts and programming efforts. It is also anticipated that the SLOCOG will use the EIR and General Plan to assist in their long-range forecasts, planning and programming efforts.
Please see the next page.
This section describes the current environmental conditions in and around the City of San Luis Obispo. More detailed setting information is included within the impact analysis for each issue area.

NOTE TO READER:
A complete discussion of the city’s existing setting (existing conditions), as it pertains to the proposed project and alternatives, is provided in the City of San Luis Obispo General Plan Update Background Report. Please refer to the Background Report (Appendix D, Volume III of this EIR), which has been incorporated herein by reference, for additional details with respect to the city’s existing environmental setting.

3.1. Regional Overview

San Luis Obispo is situated in the Central Coast Region of California along U.S. Highway 101, midway between San Francisco and Los Angeles. Its coastal location is characterized by a mild Mediterranean climate that is moderated by the influence of the Pacific Ocean. The city is nestled about 10 miles inland from the coast in a narrow valley between the Santa Lucia Mountains and volcanic hills reaching up to 3,000 feet. The City of San Luis Obispo is the business and government hub of San Luis Obispo County, and is the largest incorporated city between Santa Maria and Salinas. The city is surrounded by agriculture and open space, including vineyards, field crops, scrub oak, and grasslands. While the area has several creeks, San Luis Obispo Creek bisects the town and is a defining feature of the traditional, pedestrian-oriented downtown district.

The San Luis Obispo area is reachable by highway, rail, and air. U.S. Highway 101, a regional route, links San Luis Obispo to both San Francisco and Los Angeles. State Route 1 provides access to coastal destinations north of the area, including Morro Bay, San Simeon, and Big Sur. The Union Pacific rail line is used by Amtrak to provide passenger service to the area and passes by the passenger depot at the southeast end of Osos Street. The San Luis Obispo County Airport located just south of the city provides commercial air service to Los Angeles, San Francisco and Phoenix.

3.2. Physical Setting

General Physical Character. The urbanized area of the City of San Luis Obispo is settled between two prominent Morros and surrounded by a complex mosaic of natural habitats and agricultural uses comprising the LUCE SOI Planning Subarea. The habitats and associated plant communities found within the LUCE SOI Planning Subarea support a diverse array of native plants and resident, migratory, and locally nomadic wildlife species, some of which are considered as rare, threatened, or endangered species. San Luis Obispo and Stenner Creeks and their many tributaries provide the framework for important linkages of native riparian habitat corridors through the urbanized areas to expanses of upland habitats in the Planning Area.

Topography. The City of San Luis Obispo is located between the San Lucia Mountains and the coastal mountains of central California. Cuesta Ridge lies to the north and east of the City, the Edna Valley is to the southeast and the ridges of the Davenport and Irish Hills are to the southwest. Agricultural valleys and open space surround most of the City, including vineyards and field crops, scrub oak, and grassland communities.
Climate. The City’s topography and its proximity to the Pacific Ocean not only serve as major contributors to the scenic nature of the area, but also influence the local climate. San Luis Obispo enjoys a Mediterranean climate, with mild winters, hot summers, and moderate rainfall. Weather systems are dominated by the Pacific High, a pressure zone centered off the coast of California that diverts storm tracks northward during the summer. The area is characterized by a wet season from October to early April and a dry summer season. In general, the most rainfall is in the range of hills and mountains nearest the coast with a decreasing amount farther inland. In San Luis Obispo, the average annual rainfall is about 22 inches. In winter, the average high temperatures range from the 50s to the 60s, with lows in the 30s. There are typically a number of winter nights when temperatures fall 10-15 degrees below freezing. Summers are generally warm and sunny, often with morning fog from the Pacific coast.

Agricultural Lands. The city is located in the heart of San Luis Obispo County and the Central Coast Region, both of which are important key agricultural centers within the State of California. Wine grapes and strawberries lead a list of high value specialty crops grown in the county’s fertile soils and Mediterranean climate. There are no significant areas large tracks of land currently in major, commercial agricultural production within the City limits. The exception is the SLO City Farm. The SLO City Farm occupies approximately 25 acres and is located off of Highway 101 and Calle Joaquin Road.

City Limits and Planning Area. San Luis Obispo is one of seven incorporated cities within San Luis Obispo County. The existing city limit of San Luis Obispo encompasses 13 square miles. The City’s present Sphere of Influence outside the city limits encompasses many contiguous areas on the peripheries of the city. The City’s General Plan addresses the LUCE SOI Planning Subarea that extends beyond the current San Luis Obispo city limits (see Figure 2-2 in the EIR Project Description). 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).

3.3. Cumulative Project Setting

The State CEQA Guidelines Section 15130 requires a discussion of cumulative impacts when they are significant. The adequate discussion of related or cumulative projects may be drawn from

“a summary of projections contained in an adopted general plan or related planning document which is designed to evaluate regional or areawide conditions. Any such planning document shall be referenced and made available to the public at a location specified by the Lead Agency.”

Section 2.0 of the City of San Luis Obispo General Plan Background Report provides general overview of all current projects in the City of San Luis Obispo as of January 2012. Please refer to the Background Report for additional details regarding the cumulative project setting.

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.

By its nature, the LUCE Update considers cumulative development within the city and potential expansion areas. Thus, cumulative impacts are generally equivalent to project-specific impacts. Impacts related to specific components of the LUCE Update have been addressed individually in each respective impact analysis section. The combination of these impacts reflects the cumulative impacts of the proposed LUCE Update.
Please see the next page.
This section discusses the possible environmental effects of the proposed project for the specific issue areas that were identified through the Initial Study process as having the potential to experience significant impacts.

“Significant effect” is defined by State CEQA Guidelines §15382 as “a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment, but may be considered in determining whether the physical change is significant.”

The assessment of each issue area begins with a setting and is followed by an impact analysis. Within the impact analysis, the first subsection identifies the methodologies used and the “significance thresholds”, which are those criteria adopted by the City, other agencies, universally recognized, or developed specifically for this analysis to determine whether potential effects are significant. The next subsection describes each impact of the LUCE Update, mitigation measures for significant impacts, and the level of significance after mitigation. Each effect under consideration for an issue area is separately listed in bold text, with the discussion of the effect and its significance following. Each bolded impact listing also contains a statement of the significance determination for the environmental impact as follows:

**Class I - Significant and Unavoidable:** An impact that cannot be reduced to below the significance threshold level with implementation of reasonably available and feasible mitigation measures. Such an impact requires a Statement of Overriding Considerations to be issued if the project is approved per §15093 of the State CEQA Guidelines.

**Class II - Significant but Mitigable:** An impact that can be reduced to below the significance threshold level with implementation of reasonably available and feasible mitigation measures. Such an impact requires findings to be made under §15091 of the State CEQA Guidelines.

**Class III – Less Than Significant:** An impact that may be adverse, but does not exceed the significance threshold levels and does not require mitigation measures. However, mitigation measures that could further lessen the environmental effect may be suggested if readily available and easily achievable.

**Class IV - No Impact or Beneficial:** No impact would occur or the project would have a beneficial effect.

Following each environmental effect discussion is a listing of proposed LUCE Update policies, existing City goals/policies/programs, and/or recommended mitigation measures (if required) and the residual effects or level of significance remaining after the implementation of the policies and measures. In those cases where the mitigation measure for an impact could have a significant environmental impact in another issue area, this impact is discussed as a residual effect. The impact analysis concludes with a discussion of cumulative effects, which evaluates the impacts associated with the proposed project in conjunction with other future development in the area.

Please refer to the Executive Summary for this EIR, which clearly summarizes all impacts, proposed and existing City policies and mitigation measures that apply to the LUCE Update.
Cumulative Impacts. Because the proposed project is a General Plan update, cumulative impacts are treated somewhat differently than would be the case for a project-specific development. Section 15130 of the State CEQA Guidelines provides the following direction relative to cumulative impact analysis:

> Impacts should be based on a summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or areawide conditions contributing to the cumulative impact...

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 plan area, the analysis of traffic and related impacts (such as noise) considers the effects of regional traffic growth.

Policy Consistency. The proposed project is an update of the City’s General Plan Land Use and Circulation Elements. By state law, a General Plan must be internally consistent to be valid. That is, none of its proposed policies can conflict. The proposed elements were designed specifically with this as a guiding principle. The City’s existing General Plan is structured such that there are common goals that apply to other General Plan Elements. In this way, the General Plan Elements are inherently consistent with one another.

The General Plan must also be consistent with other local, regional, and state plans that affect natural resources, as well as issues related to air quality, health and safety. Where appropriate, the analysis that follows in Sections 4.1 through 4.16 discusses the consistency of the LUCE Update with such plans and policies.
This section reviews the City of San Luis Obispo Land Use and Circulation Element Update’s (LUCE Update) potential impacts with respect to aesthetics and community design. Specifically, changes in visual character, impacts to viewsheds, and light and glare are discussed.

4.1.1. Setting

The purpose of this section is to provide a setting for the city with respect to visual resources or aesthetics. The aesthetic setting for the city was discussed in detail in Section 6.1, Aesthetics, of the corresponding City of San Luis Obispo General Plan Update Background Report. Please refer to the Background Report, which is incorporated herein by reference, for additional details with respect to the city’s visual and aesthetic setting.

The Background Report reviews the existing context for visual resources in the City of San Luis Obispo. It describes the key visual resources in the city, including viewing corridors, and how these issues are addressed in the existing General Plan. It also describes the regulatory environment as it relates to aesthetic and viewshed issues.

a. General Visual Character

The city has 44,000 residents, and is located eight miles from the Pacific Ocean, midway between San Francisco and Los Angeles at the junction of U.S. Highway 101 and State Route 1. The city lies at the convergence of two main drainages: the Los Osos Valley which drains westerly into Morro Bay via Los Osos Creek, and San Luis Valley which drains to the southwest into the Pacific Ocean at Avila Beach via the San Luis Obispo Creek. The topography of the city and its surroundings is generally defined by several low hills and ridges formed by the more resistant volcanic and metavolcanic rocks of the area such as Bishop Peak and Cerro San Luis. These peaks are also known as morros and provide scenic focal points for much of the city. The Santa Lucia Mountains and Irish Hills are the visual limits of the area and are considered the scenic backdrop for much of the city. The surrounding hills have created a hard urban edge for the city where development has remained in the lower elevations.

The city combines a compact urban form in a rural setting and does not have one character, but several, transitioning from urban in its Downtown Core to more suburban along the edges. As reflected in current General Plan policies, the city has been successful in maintaining an urban or suburban character, while retaining a more rural character outside the city. This is most clearly demonstrated in the Laguna Lake area where Los Osos Valley Road (LOVR) leaves the city, and the relative dense housing stops abruptly, giving way to open space and agriculture in the county. A similar phenomenon is visible in many other areas, notably as one travels west on Foothill Boulevard; south on Johnson Avenue and turns left on Orcutt Road; or even as one leaves the city on Broad Street to the south. To a large extent, this is also true as a traveler leaves the city to the north, on either Highway 1 or 101. Listed below are several defined areas of the city.

**Downtown Core.** San Luis Obispo’s downtown has been recognized as having one of “America’s Best Main Streets”, in part due to a planning focus on maintaining a visual quality of defined by a combination of features broadly characterized as pedestrian-orientated and historic. This characterization is created with continuous building storefronts, mid-block pedestrian connections, and trees and features in the public realm that are designed for and oriented to pedestrians.

**Older Downtown Residential Neighborhoods.** The variety in architecture and community focus on general upkeep makes San Luis Obispo unique in that not one residential neighborhood stands alone as representative of the city. While streets
in closer proximity to the downtown core are perceived as more desirable due to location and character of homes, some of these homes have some challenges such as outdated infrastructure.

**Foothill Boulevard Neighborhoods.** The neighborhoods north of Foothill Boulevard exhibit a more suburban character than those in the downtown core. The street pattern is a rectilinear grid, providing a degree of formality and long visual sightlines along some streets. As elsewhere in the city, these neighborhoods enjoy the benefits of mature street trees and the unique visual backdrop provided by Cerro San Luis Obispo and Bishop Peak.

**Johnson Avenue Neighborhoods.** This area is somewhat similar in character to those along Foothill Boulevard, with smaller lots from the mid-20th century, featuring mature streets trees, and occasional long distance views of nearby hills from the higher elevation portions of this part of the city, particularly east of Johnson Avenue.

**Neighborhoods South of Tank Farm Road.** This neighborhood is more suburban and modern in character than the older neighborhoods to the north with quality views of nearby natural landmarks, including Islay Hill and Righetti Hill. Visually separated by the Orcutt Area and Broad Street, there are more parks and pathways.

**Laguna Lake Residential Area.** This is the most suburban portion of the city, separated from the rest of the community with a distinctly different character. The high volume of traffic on Madonna and Los Osos Valley Roads, wide multi-lane rights of way, high shrubs separating residences, and incomplete sidewalk system creates several uninviting areas for pedestrians. However, the Devaul Ranch project included the preservation of the Devaul Ranch building itself, which still provides a very important visual backdrop for travelers on Madonna Road, without which the roadway could be visually uninviting.

**Laguna Lake Freeway Commercial and Auto Center Area.** The portion of the city just west of US 101 along LOVR features the largest examples of commercial development in the city, and is regionally oriented. This includes the auto mall, as well as relatively newer big box retail establishments, such as those anchored by Home Depot and Target. Although these developments are significantly setback from Los Osos Valley Road, they contribute to a suburban aesthetic character versus the formerly rural landscape.

**Mid- and South Higuera Street.** Visually, the eclectic nature of the corridor is difficult to define, but includes older buildings closer to the downtown core and larger more modern offices such as the Department of Motor Vehicles as one moves southward. The city’s cemetery provides a visual break that essentially defines the edges of these two areas, along with the transition of Madonna Road and South Street into Higuera Street.

**South Broad Street.** This is the corridor leading to the airport, and many businesses have taken advantage of the proximity to that facility, but the airport ultimately has shaped the nature and character of development along south Broad Street toward the edge of town. Safety and noise restrictions have limited residential potential in this portion of the city, so this is the one area that feels distinctly non-residential in character. It is much more visually wide open than South Higuera Street, which otherwise has a similar function to south Broad Street. Key buildings defining the scale of some development (with very large parking lots) include the Marigold Shopping Center just south of Industrial Way and the business park buildings adjacent to the Airport near Aerovista Lane, or others just to the north along Fiero Lane.

### b. Viewing Corridors and Scenic Roadways

The rest of the city follows the lead of the downtown, with individual neighborhoods separated from one another by visual breaks, either in the grid pattern, or by topographic or transportation features. Although potentially disorienting, this does have the positive effect of creating a variety of characters for the city.

As the city generally exhibits a high scenic quality, many roadways would be considered scenic by typical standards that would apply elsewhere, either because of the distant views of surrounding mountains, or because of the unique character of the urban environment itself. However, even in this context several roadways stand out, and have been identified in the City’s existing Circulation Element (see Figure 4.1-1) and Conservation and Open Space Element as scenic corridors, either of High or Moderate Value. These roadways are included in Table 4.1-1 below.
City of San Luis Obispo Scenic Roads and Vistas

Figure 4.1-1

Source: Microsoft Corporation and its data suppliers, 2010
### Important Scenic Corridors

<table>
<thead>
<tr>
<th>High Scenic Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>U.S. Highway 101 (from the southern city limit to Marsh Street)</td>
</tr>
<tr>
<td>South Higuera Street (between Prado Road and the southern city limit)</td>
</tr>
<tr>
<td>Broad Street (between Perkins lane and the southern city limit)</td>
</tr>
<tr>
<td>Tank Farm Road (between Board and Higuera Street; and east of the UPRR tracks)</td>
</tr>
<tr>
<td>Johnson Avenue (in the vicinity of Bishop Street)</td>
</tr>
<tr>
<td>Los Osos Valley Road (west of Laguna Lane to the city limit)</td>
</tr>
<tr>
<td>Santa Rosa Street (between Boysen Avenue and the northern city limit)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Moderate Scenic Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>U.S. Highway 101 (between Marsh Street and Broad Street; then north of California Blvd.)</td>
</tr>
<tr>
<td>Santa Rosa Street (Boysen Street to Montalban Street; Peach Street to Palm Street; Islay to Church Street )</td>
</tr>
<tr>
<td>California Boulevard (from Palm Street to Cal Poly)</td>
</tr>
<tr>
<td>Grand Avenue (Hays Street to Cal Poly)</td>
</tr>
<tr>
<td>Johnson Avenue (Peach Street to Palm Street; Higuera Street to Buchon Street; San Luis Drive to near Bishop Street; LaCita Court to the southern city limit)</td>
</tr>
<tr>
<td>Monterey Street (from Highway 101 to Buena Vista Avenue)</td>
</tr>
<tr>
<td>Laurel Lane</td>
</tr>
<tr>
<td>Orcutt Road</td>
</tr>
<tr>
<td>Bishop Street</td>
</tr>
<tr>
<td>Prado Road</td>
</tr>
<tr>
<td>Foothill Boulevard</td>
</tr>
<tr>
<td>Madonna Road</td>
</tr>
<tr>
<td>Los Osos Valley Road (east of Laguna Lane to Highway 101)</td>
</tr>
</tbody>
</table>

### Visual Landmarks
While features surrounding the city are mentioned in the General Plan, none receive special view protection status through existing City policies, however General Plan Conservation and Open Space Element policies and programs place high values on creek areas and historic resources. Based on the zoning code and Community Design Guidelines the following list of features could be considered scenic in Table 4.1-2 below. Please refer to the project Background Report (Section 6.1, Aesthetics) for a detailed discussion of the visual landmarks and scenic features identified herein.

<table>
<thead>
<tr>
<th>Scenic Features in the City</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Morros</td>
</tr>
<tr>
<td>Santa Lucia Mountains</td>
</tr>
<tr>
<td>Irish Hills</td>
</tr>
<tr>
<td>Laguna Lake</td>
</tr>
<tr>
<td>Open Space and Agricultural Fields surrounding the city</td>
</tr>
<tr>
<td>Historic Buildings</td>
</tr>
<tr>
<td>Downtown Core Streetscape</td>
</tr>
<tr>
<td>Mission Plaza</td>
</tr>
<tr>
<td>Creeks; particularly San Luis Obispo Creek in the Downtown Core</td>
</tr>
<tr>
<td>Mill Street (between Johnson Avenue and Pepper Street)</td>
</tr>
</tbody>
</table>
4.0 Environmental Impact Analysis

**d. Regulatory Setting**

The City of San Luis Obispo regulates aesthetics of buildings and public spaces through implementation of adopted policies and programs. The City’s General Plan Land Use and Circulation Element Update, Conservation and Open Space Element, as well as the implementing statutes of the Municipal Code/Zoning Code and Community Design Guidelines are the core of this mechanism. Please refer to the project Background Report for a detailed discussion of the regulatory setting for aesthetics and visual resources. The impact analysis in Section 4.1.2 below includes City policies intended to recognize local visual resources and mitigate the effects of growth and development.

Architectural Review Committee: In addition to regulation through local General Plan policies, the City’s Architectural Review Commission (ARC) reviews and approves the design of proposed buildings. Architectural review is a process whereby the City’s ARC examines a proposed project’s layout, building design, its relationship to the neighborhood in which it would be located, landscaping, parking, signage, lighting, and other features affecting the project’s appearance. The ARC is charged with administering architectural review to help achieve attractive and environmentally sensitive development. The ARC’s by-laws include design review process goals of maintaining property values, preserving the city’s natural beauty and distinct visual character, attracting growth in the local economy and maintaining the community’s quality of life for residents. The ARC uses the City’s Community Design Guidelines as a basis for evaluating the suitability and appropriateness of individual project design.

**4.1.2. Impact Analysis**

**a. Methodology and Significance Thresholds**

The assessment of aesthetic impacts involves qualitative analysis that is inherently subjective in nature. This evaluation measures the existing visual environment against the proposed action, analyzing the nature of the anticipated change. The City of San Luis Obispo does not have adopted thresholds of significance for Aesthetics. An impact is considered significant if the proposed development scenario development under the proposed LUCE Update would result in one or more of the following conditions:

- Would have a substantial adverse effect on an identified visual resource or scenic vista from a public viewing area (roadways and public parks);
- Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway;
- Substantially degrade the existing visual character or quality of the area and its surroundings; or
- Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

**b. Project Impacts**

**Impact AES-1**

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.

Potential development under the proposed LUCE Update policies could result in increased urbanization along the viewing corridors and scenic roadways identified above in Table 4.1-1 and 4.1-2. The proposed Airport overlay zone and compatibility criteria changes would not, in and of themselves, result in an environmental impact. However, future
development in areas under the given zones could result in impacts and are discussed here in relation to the general development anticipated under the LUCE Update. Anticipated development under the proposed LUCE Update as well as in identified expansion areas and infill development within the city would be visible from many places in the city. Construction in these areas could create short-term visual impacts to these important visual corridors as well. These would include short-term impacts:

- Blockage of views by construction equipment and staging areas;
- Disruption of views by temporary signage; and
- Exposure of slopes and removal of vegetation;

These would also include long-term impacts:

- Structural development within identified scenic areas; and
- View blockages by new structures, signs, and parking areas.

During the construction period, short-term impacts to aesthetic impacts could include blockage of views from construction equipment, temporary signage, and removal of vegetation. With regard to long-term aesthetic impacts, new buildings, signage, parking, and accessory facilities have the potential to cause significant impacts. The degree of these impacts is heavily dependent on the siting and design of these features relative to important scenic views. The proposed LUCE Update encourages infill development in areas already within the city limits. Infill development has the potential to reduce aesthetic impacts in rural areas surrounding the city by accommodating development pressure within the urban area rather than on the edges of the city. Future development under the LUCE Update would result in increased urbanization along the viewing corridors identified above. However, implementation of the proposed LUCE Update policies, and the existing City policies identified below, would reduce impacts to less than significant levels.

**Proposed LUCE Update Development Special Planning 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 development along viewing corridors and scenic roadways, 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 new development in scenic areas.

**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 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;
4.0 Environmental Impact Analysis

- **General Hospital Site:** This site is located off of Johnson Avenue, between the Urban Reserve Line and the City limit line and is adjacent to designated Open Space. This site represents the visual limit of city development along the eastern boundary of the city, as the site climbs the hillside and associated Open Space to the east. Future development of the site in accordance with the LUCE Update could potentially introduce structural development that could impact scenic views of the hillsides and designated Open Space;

- **Calle Joaquin Auto Sales Area:** Calle Joaquin is located parallel to Highway 101 at the southern boundary of the City, at the southern edge of the San Luis Ranch (Dalidio) Specific Plan Area. This area supports some commercial/hotel development to the south and is relatively undeveloped towards the north near San Luis Ranch. This undeveloped area supports views of the rural landscape and agricultural land south of the city. Future development along this corridor could introduce structures with the potential to block or obstruct rural views adjacent to a section of Highway 101 identified as a high value scenic resource; and

- **LOVR Creekside Area:** This area is located adjacent to a section of Los Osos Valley Road identified as a moderate value scenic resource. Development of the site could result in increased urbanization of the existing viewshe of the Los Osos Valley Road and could potentially block or obstruct existing public views of the low-lying wetland area and adjacent open hillside.

### Proposed Circulation Element Street Network Changes

- **Transit Center Location on Santa Rosa Street and Higuera Street:** This street intersection is within the city downtown core and represents a gateway into the commercial/retail center of the downtown core. Due to limitations on existing building heights, this site does support some public views of the open hillside surrounding the city. Future development of a Transit Center could potentially result in the blockage or partial obstruction of surrounding viewsheds and scenic resources. However, it is important to note that this area is a currently developed portion of the city’s urban core and future development would not introduce structures in an undeveloped area; and

- **Prado Road Interchange vs. Overpass:** This project area is located along Highway 101 at the southern boundary of the City, near San Luis Ranch (Dalidio) Specific Plan Area, just north of the Calle Joaquin Street area. The San Luis Obispo Promenade shopping center is adjacent to the site; Laguna Lake Park is located to the north, with single family residential development to the west and agricultural land with commercial development beyond. This area supports views of the rural landscape and agricultural land south of the city. Future development of an interchange or overpass along this corridor could introduce structures with the potential to block or obstruct rural views adjacent to a section of Highway 101 identified as a high value scenic resource.

The potential scenic impacts related to implementation of the above development area projects and street network changes would be considered significant, however, incorporation of the LUCE Update policies and existing City policies discussed below would reduce impacts to less than significant levels.

### Proposed Land Use Element Specific Plan Areas

- **San Luis Ranch Specific Plan Area:** This 132 acre area (formerly the Dalidio Specific Plan area) is located in the southwest quarter of the city at the corner of Madonna Road and Dalidio Drive. The general development parameters for the San Luis Ranch Specific Plan Area have been outlined in the proposed LUCE Update in Section 2.0, Project Description. The San Luis Ranch site is characterized primarily by its use as an agricultural property. Dominant visual features at the site are the predominantly flat landform seasonally planted with row crops, an existing stand of eucalyptus trees in the southwest portion of the site, and the Dalidio farm home located in the northwest portion of the site. The San Luis Obispo Promenade shopping center is located east of the site; Laguna Lake Park is located to the north; single family residential development is to the west; U.S Highway 101 is to the east and south; and agricultural land with commercial development beyond, is south of the site.

The San Luis Ranch Specific Plan Area is located adjacent to a section of Highway 101 identified as a high value scenic resource. Development of the site, as outlined in the proposed LUCE Update, could result in increased urbanization of the existing viewshe along the Highway 101 corridor and could potentially block or obstruct...
existing public views. However, implementation of the proposed LUCE Update policies, and the existing City policies identified below, would reduce impacts to less than significant levels.

- **Madonna on Los Osos Valley Road Specific Plan Area.** This site includes just over 111 acres and is located directly west of the intersection of Los Osos Valley Road and Calle Joaquin. The planned development parameters for the Madonna on Los Osos Valley Road Specific Plan Area have been outlined in the proposed LUCE Update in Section 2.0, Project Description. The Madonna on Los Osos Valley Road site is characterized primarily by its use as an agricultural property with some wetland and flat grassland that transitions into the steeper hillsides to the south.

  The Madonna on Los Osos Valley Road Specific Plan area is located adjacent to a section of Los Osos Valley Road identified as a moderate value scenic resource. Development of the site, as outlined in the proposed LUCE Update, could result in increased urbanization of the existing viewshed along the Los Osos Valley Road and could potentially block or obstruct existing public views. However, implementation of the proposed LUCE Update policies, and the existing City policies identified below, would reduce impacts to less than significant levels.

- **Avila Ranch Specific Plan Area.** This site encompasses approximately 150 acres and is located on the north side of Buckley Road at the far southern edge of the city. The planned development parameters for the Avila Ranch Specific Plan Area have been outlined in the proposed LUCE Update in Section 2.0, Project Description. The County-operated airport is to the east of the Avila Ranch Specific Plan Area. The site is influenced by distant views of the hills, including the Irish Hills to the West, Cerro San Luis Obispo to the Northwest, South Hills to the north, Davenport Hills to the South, and Islay Hill to the East. There are some existing buildings along the north and west consisting of service and manufacturing uses, which influence site views.

  The Avila Ranch Specific Plan Area is located adjacent to a section of Buckley Road which has not been identified as scenic resource. However, development of the site, as outlined in the proposed LUCE Update, could result in 500 to 700 homes and 15,000-25,000 square feet of commercial space with 75 acres of open space. This increase in development could impact the existing public viewshed along the Buckley Road. However, implementation of the proposed LUCE Update policies, and the existing City policies identified below, would reduce impacts to less than significant levels.

- **South Broad Street Special Planning Area.** The South Broad Street Area encompasses approximately 86 acres and is bounded by the Broad Street on the west, the Union Pacific Railroad on the east, High Street to the north, and Orcutt Road to the south. Nearby services and amenities to the north include: the Regional Transit Center, Fire Station #1, Hawthorne Elementary School, and Meadow Park. To the south, there are retail shopping centers, the Maxine Lewis Memorial Shelter, and the Damon-Garcia Sports Fields facility. Under the proposed LUCE Update, the South Broad Street Special Planning Area is included as a land use development area considered for revised development standards as part of the proposed project.

  The South Broad Street Special Planning Area has been the subject of advanced planning and public outreach efforts by the City resulting in the City Council’s endorsement of the “Draft South Broad Street Area Plan” on September 17, 2013.

  The South Broad Street Special Planning Area is located on Broad Street, a portion of which is identified as a high value scenic resource in Table 4.1-1. Development of the area, as outlined in the proposed LUCE Update, could result in increased urbanization of the existing viewshed along the Broad Street corridor and could potentially block or obstruct existing public views. However, implementation of the proposed LUCE Update policies, the Draft Broad Street Area Plan standards, and the existing City policies identified below, would reduce impacts to less than significant levels.

Applicable LUCE Update Policies

The General Plan Land Use Element Update draft includes edits to existing policies and programs for public views from the increase of urbanization along the viewing corridors and scenic roadways (policy language edited as part of the LUCE Update is shown using “strikeout and underline” format), while some existing language was retained after critical review:
1.3 **Urban Edges Character.** The City shall maintain a clear boundary between San Luis Obispo's urban development and surrounding open land should be clear. Development just inside the boundary shall provide measures to avoid a stark-appearing edge between buildings in the city and adjacent open land. Such measures may include: using new or existing groves or windrows of trees, or hills or other landforms, to set the edge of development; increasing the required side-yard and rear-yard setbacks; and providing open space or agricultural transition buffers.

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.

2.2.10 **Site Constraints.** The City shall require new Residential developments shall to respect site constraints such as property size and shape, ground slope, access, creeks and wetlands, wildlife habitats, wildlife corridors, native vegetation, and significant trees.

4.0.6 **Open Places and Views.** The City shall enhance the Downtown should include many carefully located open places where people can rest and enjoy views of the surrounding hills; and Downtown should include some outdoor spaces where people are completely separated from vehicle traffic, in addition to Mission Plaza. Opportunities include extensions of Mission Plaza, a few new plazas, and selected street closures.

4.0.12 **New Buildings and Views.** New Downtown development nearby publicly-owned gathering places such as Mission Plaza, the Jack House Gardens, LC YC Cheng Park, and similar gathering spaces shall respect views of the hills framing rather than obscuring them. Adjacent buildings shall be designed to allow sunlight to reach these open spaces, and when planting new trees the potential canopy shall be considered subordinate to maintaining views of the hillsides. In other locations Downtown, views will be provided parallel to the street right-of-way, at intersections where building separation naturally makes more views available, and at upper-level viewing decks.

4.0.26 **Visual Resource Study.** The City shall will undertake a study of visual resources within the Downtown core area to identify potential locations for new public-owned open places with access to views of important scenic resources. The City will consider acquisition of one or more of these open places as resources permit. A range of options for property acquisition, including development agreements, will be considered, consistent with the City’s fiscal policies and objectives.

6.0.2 **Resource Mapping.** The City shall prepare and maintain geographic information systems-based maps of the city, the urban reserve, and the planning area to guide in land use designations and decision-making. Maps for the city and urban reserve shall be in sufficient detail to highlight all significant natural resources and systems. Maps for the planning area may be at a lesser degree of detail.

The maps shall show at least the following resources: native plant communities, wildlife habitats and corridors, aquatic ecosystems, productive or potentially productive soils (prime or other unique agricultural soil types), viewsheds, terrain, hillsides, greenbelt areas. The overlay maps shall also show development constraints such as flood hazard areas, geological hazard areas, soil hazard areas (subsidence, liquefaction), noise impact areas, airport hazard and noise areas, radiation hazard areas.

The maps shall provide the basis of determining where urban development is most appropriate, and where other needs of the community outweigh the desire or need for urban development. As a result of the findings of these maps, the City shall re-evaluate its land use designations and future plans for undeveloped areas, and revise the LUE land use map accordingly.

6.2 **Hillside Policies.** As noted in the open space section of this element and in the Conservation and Open Space Element, San Luis Obispo wants to keep open its steeper, higher, and most visible hillsides. Some of the lower and less steep hillside areas, however, are seen as suitable for development, particularly where development is coupled with permanent open space protection of the more sensitive areas. This section focuses on where and how some hillsides may be developed.
6.2.1 The City shall maintain established comprehensive standards and policies for hillside development for the following reasons:

A. To protect and preserve scenic hillside areas and natural features such as the volcanic Morros, ridge lines, plant communities, rock outcroppings and steep slope areas that function as landscape backdrops for the community.

B. To set the limits of commercial and residential development in hillside areas by establishing a permanent open space green belt at the edge of the community.

C. To protect the health, safety and welfare of community residents by directing development away from areas with hazards such as landslides, wildland fires, flooding and erosion.

The General Plan Circulation Element Update lists policies and programs aimed to protect public views from the increase of urbanization along the viewing corridors and scenic roadways which include:

15.0.2 Development Along Scenic Routes. The City will preserve and improve views of important scenic resources form streets and roads. Development along scenic roadways should not block views or detract from the quality of views.

A. Projects, including signs, in the viewshed of a scenic roadway should be considered as "sensitive" and require architectural review.

B. Development projects should not wall off scenic roadways and block views.

C. As part of the City's environmental review process, blocking of views along scenic roadways should be considered a significant environmental impact.

D. Signs along scenic roadways should not clutter vistas or views.

E. Street lights should be low scale and focus light at intersections where it is most needed. Tall light standards should be avoided. Street lighting should be integrated with other street furniture at locations where views are least disturbed. However, safety priorities should remain superior to scenic concerns.

F. Lighting along scenic roadways should not degrade the nighttime visual environment and night sky per the City’s Night Sky Preservation Ordinance.

15.0.3 Public Equipment and Facilities. The City and other agencies should be encouraged to avoid cluttering scenic roadways with utility and circulation-related equipment and facilities.

A. Whenever possible, signs in the public right-of-way should be consolidated on a single low-profile standard.

B. Public utilities along scenic highways should be installed underground.

C. The placement of landscaping and street trees should not block views from Scenic Routes. Clustering of street trees along scenic roadways should be considered as an alternative to uniform spacing.

D. Traffic signals with long mast arms should be discouraged along scenic roadways.

Applicable Existing City Policies

The existing General Plan Conservation and Open Space Element (2006) lists policies and programs aimed to protect public views from the increase of urbanization along the viewing corridors and scenic roadways which include:

8.6.3 Required mitigation. Loss or harm shall be mitigated to the maximum extent feasible. Mitigation must at least comply with Federal and State requirements. Mitigation shall be implemented and monitored in compliance with State and Federal requirements, by qualified professionals, and shall be funded by the project applicant.

G. Any development that is allowed on a site designated as Open Space or Agriculture, or containing open-space resources, shall be designed to minimize its impacts on open space values on the site and on neighboring land.
1. Hillside development shall comply with the standards of the Land Use Element, including minimization of grading for structures and access, and use of building forms, colors, and landscaping that are not visually intrusive. (See also Chapter 9.21.1)

9.1.1 Preserve natural and agricultural landscapes. The City will implement the following policies and will encourage other agencies with jurisdiction to do likewise:

A. Natural and agricultural landscapes that the City has not designated for urban use shall be maintained in their current patterns of use.

B. Any development that is permitted in natural or agricultural landscapes shall be visually subordinate to and compatible with the landscape features.

Development includes, but is not limited to buildings, signs (including billboard signs), roads, utility and telecommunication lines and structures. Such development shall:

1. Avoid visually prominent locations such as ridgelines, and slopes exceeding 20 percent.
2. Avoid unnecessary grading, vegetation removal, and site lighting.
3. Incorporate building forms, architectural materials, and landscaping that respect the setting, including the historical pattern of development in similar settings, and avoid stark contrasts with its setting.
4. Preserve scenic or unique landforms, significant trees in terms of size, age, species or rarity, and rock outcroppings.

C. The City’s non-emergency repair, maintenance, and small construction projects in highly visible locations, such as hillsides and downtown creeks, where scenic resources could be affected, shall be subject to at least “minor or incidental” architectural review.

9.1.3 Utilities and signs. In and near public streets, plazas, and parks, features that clutter, degrade, intrude on, or obstruct views should be avoided. Necessary features, such as utility and communication equipment, and traffic equipment and signs should be designed and placed so as to not impinge upon or degrade scenic views of the Morros or surrounding hillsides, or farmland, consistent with the primary objective of safety. New billboard signs shall not be allowed, and existing billboard signs shall be removed as soon as practicable, as provided in the Sign Regulations.

9.1.4 Streetscapes and major roadways. In the acquisition, design, construction or significant modification of major roadways (highways/ regional routes and arterial streets), the City will 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:

A. Establish streetscape design standards for major roadways.

B. Encourage the creation and maintenance median planters and widened parkway plantings.

C. Retain mature trees in the public right-of-way.

D. Emphasize the planting and maintenance of California Native tree species of sufficient height, spread, form and horticultural characteristics to create the desired streetscape canopy, shade, buffering from adjacent uses, and other desired streetscape characteristics, consistent with the Tree Ordinance or as recommended by the Tree Committee or as approved by the Architectural Review Commission.

E. 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.

F. Encourage and where possible, require undergrounding of overhead utility lines and structures.
9.1.5 **View protection in new development.** The City will include all environmental review and carefully consider effects of new development, streets and road construction on views and visual quality by applying the Community Design Guidelines, height restrictions, hillside standards, Historical Preservation Program Guidelines and the California Environmental Quality Act and Guidelines.

9.2.1 **Views to and from public places, including scenic roadways.** The City will preserve and improve views of important scenic resources from public places, and encourage other agencies with jurisdiction to do so. Public places include parks, plazas, the grounds of civic buildings, streets and roads, and publicly accessible open space.

A. Development projects shall not wall off scenic roadways and block views.

B. Where important vistas of distant landscape features occur along streets, street trees shall be clustered to facilitate viewing of the distant features.

C. Development projects, including signs, in the viewshed of a scenic roadway shall be considered “sensitive” and require architectural review.

9.2.2 **Views to and from private development.** Projects should incorporate as amenities views from and within private development sites. Private development designs should cause the least view blockage for neighboring property that allows project objectives to be met.

9.3.2 **Update Community Design Guidelines.** Update and maintain Community Design Guidelines to address views from scenic roadways and include them in design standards in plans for sub-areas of the City.

9.3.4 **Environmental and architectural review.** Conduct environmental review and architectural review consistent with General Plan goals and policies regarding visual impacts and quality.

9.3.5 **Visual assessments.** Require evaluations (accurate visual simulations) for projects affecting important scenic resources and views from public places.

9.3.6 **View blockage along scenic highways.** Determine that view blockage along scenic roadways is a significant impact.

9.3.8 **Scenic highway designation.** Advocate State and County scenic highway designations and protective programs for scenic routes connecting San Luis Obispo with other communities.

9.3.9 **Undergrounding utilities.** Place existing overhead utilities underground, with highest priority for scenic roadways, entries to the city, and historical districts.

9.3.10 **Prohibit billboards.** Not allow additional billboards.

9.3.11 **Billboard removal.** Remove existing billboards through amortization, conditions of development approval, and grants for enhancing open-space and transportation corridors, with highest priority for scenic roadways, entries to the city, and historical districts.

9.3.12 **Preserve the Morros.** In cooperation with the County of San Luis Obispo, other government agencies, non-profit agencies and property owners, the City will seek to preserve the Morros as open space through preservation incentives, easements, land acquisition, or other measures to preserve visual qualities.

9.3.13 **Monitor viewsheds.** The City will establish and maintain a program of describing and monitoring viewsheds within and adjacent to City limits to establish a photographic baseline of visual setting and conditions.

The existing Community Design Guidelines include the following Residential Project Design and Site Design policies:

**Chapter 5 - Residential Project Design**

5.2 **Subdivision Design and General Residential Project Principles.**

A. Develop “neighborhoods.” Each new residential project should be designed to integrate with the surrounding neighborhood to ensure that it maintains the established character.
B. Integrate open space. New subdivisions adjacent to planned or existing parks or other public open spaces (e.g., creeks, riparian areas), or the landscaped grounds of schools or other public facilities should maximize visibility and pedestrian access to these areas.

E. Site planning. Residential subdivision and multi-family project site planning should emphasize the needs of pedestrians and cyclists rather than cars.

2. Open space and natural features.
   a. Natural amenities (such as views, mature trees, creeks, riparian corridors, rock outcrops, and similar features) should be preserved and incorporated into proposed development to the greatest extent feasible. Reduced density and the clustering of units in hillside areas is encouraged as a means of achieving this goal.
   c. Development on hillsides should generally follow the natural terrain contour. Stepped building pads, larger lot sizes, and setbacks should be used to preserve the general shape of natural land forms and to minimize grade differentials with adjacent streets and with adjoining properties.

The Architectural Review Commission (ARC) reviews and approves the design for proposed buildings. Architectural review is a process whereby the City’s ARC examines a proposed project’s layout, building design, its relationship to the neighborhood in which it would be located, landscaping, parking, signage, lighting, and other features affecting the project’s appearance. 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.

Adherence to the existing City’s General Plan, the proposed LUCE Update, and the implementing statutes of the Municipal Code/Zoning Code, Community Design Guidelines, and City’s Architectural Review Commission (ARC) policies and Guidelines, will ensure that impacts from increased urbanization along the viewing corridors and scenic roadways remain less than significant. No additional policy direction is required. Individual development will be required to undergo separate environmental review, which may result in specific impacts that require project specific mitigation consistent with these policies.

Mitigation Measures
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. However, the proposed and existing City policies and programs discussed above directly address future development with the potential to impact viewing corridors and scenic roadways. 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. As such, with the incorporation of the proposed project and adherence to existing City policies and programs discussed above, additional mitigation is not required.

Significance After Mitigation
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.

Impact AES-2

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.
The LUCE Update policies would facilitate the development and redevelopment of lands within the city. These areas include reuse of existing urbanized lands, infill development on vacant parcels, and new development on vacant parcels near urban areas. The proposed Airport overlay zone and compatibility criteria changes would not, in and of themselves, result in an environmental impact. However, future development in areas under the given zones could result in impacts and are discussed here in relation to the general development anticipated under the LUCE Update.

The intensification of land use anticipated to occur in certain areas of the city may be considered degradation of the existing visual character and its surroundings to some viewers due to the presence of larger buildings and the corresponding reduction in vacant land within the city’s framework. However, the reuse and intensification of already developed areas would be expected to reduce the pressure for development at the city’s periphery, thus minimizing the potential for the loss of open lands adjacent to the city, protected for their visual character.

Much of the intensification and reuse that would be facilitated under the LUCE Update would also generally be expected to enhance the visual character of the community. In particular, it is anticipated that future redevelopment in the South Broad Street Special Planning Area (discussed below) would enhance visual quality by adding attractive infill development.

**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 degradation of the existing visual character and surroundings, 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 degradation of the given site visual character.

**Proposed Land Use Element Development 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 degrade scenic views.

- **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 degradation of scenic viewing areas;

- **General Hospital Site:** This site is located off of Johnson Avenue, between the Urban Reserve Line and the City limit line and is adjacent to designated Open Space. This site represents the visual limit of development along the eastern boundary of the city, as the site climbs the hillside and associated Open Space to the east. Future development of the site in accordance with the LUCE Update could potentially introduce structural development that could degrade scenic views of the hillsides and designated Open Space;

- **Calle Joaquin Auto Sales Area:** Calle Joaquin is located parallel to Highway 101 at the southern boundary of the City, at the southern edge of the San Luis Ranch (Dalidio) Specific Plan Area. This area supports some commercial/hotel development to the south and is relatively undeveloped towards the north near San Luis Ranch. This undeveloped area supports views of the rural landscape and agricultural land south of the city. Future development along this corridor could introduce structures with the potential to degrade rural views adjacent to a section of Highway 101 identified as a high value scenic resource; and
4.0 Environmental Impact Analysis

- **LOVR Creekside Area**: This area is located adjacent to a section of Los Osos Valley Road identified as a moderate value scenic resource. Development of the site could result in increased urbanization of the existing viewsheet along the Los Osos Valley Road and could potentially degrade existing public views of the low-lying wetland area and adjacent open hillside.

**Proposed Circulation Element Street Network Changes**

- **Transit Center Location on Santa Rosa Street and Higuera Street**: This street intersection is located within the city downtown core and represents a gateway into the commercial/retail center of the downtown core. Due to limitations on existing building heights, this site does support some public views of the open hillsides surrounding the city. Future development of a Transit Center could potentially result in the degradation of surrounding viewsheds and scenic resources. However, it is important to note that this area is a currently developed portion of the city’s urban core and future development would not introduce structures in an undeveloped area; and

- **Prado Road Interchange vs. Overpass**: This project area is located along Highway 101 at the southern boundary of the City, near San Luis Ranch (Dalidio) Specific Plan Area, just north of the Calle Joaquin Street area. The San Luis Obispo Promenade shopping center is adjacent to the site; Laguna Lake Park is located to the north, with single family residential development to the west and agricultural land with commercial development beyond. This area supports views of the rural landscape and agricultural land south of the city. Future development of an interchange or overpass along this corridor could introduce structures with the potential to degrade rural views adjacent to a section of Highway 101 identified as a high value scenic resource.

The potential scenic impacts and visual degradation related to implementation of the above development area projects and street network changes would be considered significant, however, incorporation of the LUCE Update policies and existing City policies discussed below would reduce impacts to less than significant levels.

**Proposed Land Use Element Specific Plan Areas**

- **San Luis Ranch Specific Plan Area**: The San Luis Ranch site is characterized primarily by its use as an agricultural property. Dominant visual features at the site are the predominantly flat landform seasonally planted with row crops, an existing stand of eucalyptus trees in the southwest portion of the site, and the Dalidio farm home located in the northwest portion of the site. Development of the area, as outlined in the proposed LUCE Update, could result in increased urbanization of an undeveloped area which could degrade the existing visual character and its surroundings. However, implementation of the proposed LUCE Update policies, and the existing City policies identified below, would reduce impacts to less than significant levels.

- **Madonna on Los Osos Valley Road Specific Plan Area**: The planned development parameters for the Madonna on Los Osos Valley Road Specific Plan Area have been outlined in the proposed LUCE Update in Section 2.0, Project Description. This area is primarily undeveloped with some agriculture structures to support cattle grazing. The surrounding uses consist mainly of hotels, car dealerships, gas stations, restaurants, and retail outlets.

  Development of the area, as outlined in the proposed LUCE Update, has the potential to result in increased urbanization of an undeveloped area which could degrade the existing visual character and its surroundings. However, implementation of the proposed LUCE Update policies, and the existing City policies identified below, would reduce impacts to less than significant levels.

- **Avila Ranch Specific Plan Area**: This area is primarily undeveloped with some existing buildings along the north and west consisting of service and manufacturing uses. The County-operated airport is to the east of the Avila Ranch Specific Plan Area.

  However, development of the site, as outlined in the proposed LUCE Update, could result in 500 to 700 homes and 15,000-25,000 square feet of commercial space with 75 acres of open space. This increase in development could impact the existing visual character and its surroundings. However, implementation of the proposed LUCE Update policies, and the existing City policies identified below, would reduce impacts to less than significant levels.
South Broad Street Special Planning Area. The South Broad Street Special Planning Area has been the subject of advanced planning and public outreach efforts by the City resulting in the City Council’s endorsement of the “Draft South Broad Street Area Plan” on September 17, 2013. The South Broad Street Area Plan implements General Plan policies by changing manufacturing and service commercial zones to commercial retail and service commercial designations, providing an emphasis on higher-density infill housing and mixed-uses, and form-based codes to guide development form.

Development of the area, as outlined in the proposed LUCE Update, could result in increased urbanization of the existing area along the Broad Street corridor. There are areas where development would either be new (located on vacant properties), or the intensity would increase beyond existing conditions in this area. This could include increased height, as well as larger overall scale and massing. However, implementation of the proposed LUCE Update policies, the Draft South Broad Street Area Plan standards, and the existing City policies identified below, would reduce impacts to less than significant levels.

Applicable LUCE Update Policies
The General Plan Land Use Element Update includes goals, policies and programs to protect degradation to the existing visual character and its surroundings from the increase of urbanization along the viewing corridors and scenic roadways. The following policies address potential degradation of existing visual characteristics:

- 1.3 Urban Edges Character
- 1.7.1 Open Space Protection
- 2.2.10 Site Constraints
- 4.0.6 Open Places and Views
- 4.0.12 New Buildings and Views
- 4.0.26 Visual Resource Study
- 6.0.2 Resource Mapping
- 6.2.1.1 The City shall maintain comprehensive standards and policies for hillside development
- 6.2 Hillside Policies

Please refer to the policy discussion under Impact AES-1 for the full text of the policies and programs listed above. In addition to implementation of these policies and programs, the following Land Use Element Update policies and programs address potential degradation of existing visual characteristics.

2.2 Residential Location, Uses, and Design

- 2.2.3 Residential next to Non-residential. In designing development at the boundary between residential and non-residential uses, the City shall make protection of a residential atmosphere the first priority.

- 2.2.5 Neighborhood Pattern. The City shall require that all new residential development should be integrated with existing neighborhoods. Where physical features make this impossible, the new development should create new neighborhoods.

- 2.2.7 Natural Features. The City shall require residential developments should to preserve and incorporate as amenities natural site features, such as landforms, views, creeks, wetlands, wildlife habitats, wildlife corridors, and plants.

- 2.2.8 Parking. The City shall discourage the development of large parking lots should be avoided and require parking lots should to be screened from street views. In general, parking should not be provided located between buildings and the public streets.

- 2.2.9 Compatible Development. The City shall require that new housing built within an existing neighborhood should be sited and designed to be compatible with the scale and in character with that of the neighborhood. All multifamily development and large group-living facilities should shall be compatible with any nearby, lower density development. Compatibility shall be evaluated using the following criteria:
Architectural Character. New buildings should respect existing buildings which contribute to neighborhood historical or architectural character, in terms of size, spacing, and variety.

A. Front Setback Patterns. New development shall match the typical range of setbacks used in areas adjacent to the project.

B. Landscaping. New development shall repeat or enhance the landscaping provided in parkway areas (if any exist) along street frontages.

C. Rhythm of Development. New development shall reflect the rhythm of existing development in the area including features such as setbacks and façade widths along the front setback. Larger structures, such as multi-family (as allowed by the General Plan land use designation for the site) should replicate the spacing of structural components along the street frontage.

D. Street Orientation. New development shall match the general orientation of existing residential structures in the adjacent area and shall provide an inviting façade facing public streets.

E. Architecture. Architectural compatibility will be assessed based on a combination of factors, including height, scale, mass, form and architectural style. Desired outcome is a smooth transition between existing and proposed development, supporting a quality neighborhood.

F. Privacy and Solar Access. New buildings will respect the privacy and solar access of neighboring buildings and outdoor areas, particularly where multiistory buildings or additions may overlook backyards of adjacent dwellings. (See also the City’s Conservation and Open Space Element.)

G. Preservation of Natural, Historic and Cultural Features. New development shall:
   a. Respect historic context
   b. Maintain mature trees on-site to the maximum extent feasible
   c. Protect stream corridors and natural drainages

H. Housing Diversity. A mix of housing types and a range of density within a neighborhood is generally desirable (see also Policy 2.1.6).

I. Parking. New development:
   a. Outside of the Downtown In-lieu Parking Fee Area, new development will be required to provide adequate off-street parking to match the intended use.
   b. For multi-family, parking shall be sited and designed to minimize the visual impact from the public street.

2.2.11 Residential Project Objectives. Residential projects should provide:

A. Privacy, for occupants and neighbors of the project;

B. Adequate usable outdoor area, sheltered from noise and prevailing winds, and oriented to receive light and sunshine

C. Use of natural ventilation, sunlight, and shade to make indoor and outdoor spaces comfortable with minimum mechanical support.

D. Pleasant views from and toward the project;

E. Security and safety.

F. Bicycle facilities consistent with the City's Bicycle Plan: Separate paths for vehicles and for people, and bike paths along collector streets

H. Noise and visual separation from adjacent roads and commercial uses. (Barrier walls, isolating a project, are not desirable. Noise mitigation walls may be used only when there is no practicable alternative. Where walls are used, they should help create an attractive pedestrian, residential setting through features such
as setbacks, changes in alignment, detail and texture, places for people to walk through them at regular intervals, and planting.)

I. Design elements that facilitate neighborhood interaction, such as front porches, front yards along streets, and entryways facing public walkways.

J. Buffers from hazardous materials transport routes, as recommended by the City Fire Department.

4.0.11 Building Conservation and Compatibility. The City shall ensure that architecturally and historically significant buildings should be preserved and restored and that new buildings should be compatible with architecturally and historically significant buildings, but not necessarily the same style.

4.0.12 New Buildings and Views. New Downtown development nearby publicly-owned gathering places such as Mission Plaza, the Jack House Gardens, LCYC Cheng Park, and similar gathering spaces shall respect views of the hills framing rather than obscuring them. Adjacent buildings shall be designed to allow sunlight to reach these open spaces, and when planting new trees the potential canopy shall be considered subordinate to maintaining views of the hillsides. In other locations Downtown, views will be provided parallel to the street right-of-way, at intersections where building separation naturally makes more views available, and at upper-level viewing decks.

4.0.19 Building Height. New buildings shall fit within the context and vertical scale of existing development, shall not obstruct views from, or sunlight to, publicly-owned gathering places such as Mission Plaza, and should be set stepped back above the second or third level to maintain a street façade that is consistent with the historic pattern of development. Generally, new buildings should not exceed 650 feet in height. Tall buildings (50-75 feet) shall be designed to achieve multiple policy objectives, including design amenities, housing and retail land uses, such as:

a. Publicly accessible, open viewing spaces at the upper levels
b. Housing affordability in excess of the Inclusionary Housing Requirement
c. Energy efficiency beyond State mandated requirements
d. Adaptive reuse of a historical resource in a manner consistent with the Secretary of the Interior’s Standards for Rehabilitation

e. A major pedestrian connection between Higuera Street and the Creekwalk, Monterey Street and the Creekwalk, between Higuera Street and Marsh Street, or at another acceptable mid-block location.
f. High residential density (e.g. above 24 units per acre) achieved by a concentration of smaller dwelling units
g. Provide midblock or other significant pedestrian connections
h. Increased retail floor area, including multi-story retail
i. Directly implements specific and identifiable City objectives, as set forth in the General Plan, the Conceptual Plan for the City’s Center, the Downtown Strategic Plan and other key policy documents
j. Receiving Transfer of Development Credits for open space protection or historic preservation
k. Proximity of housing to convenient transit connections

The General Plan Circulation Element Update lists policies and programs aimed to address the degradation to the existing visual character and its surroundings from growth. In addition to those listed above, the following policies and programs discussed in detail under Impact AES-1 also address visual degradation:

- 15.0.2 Development Along Scenic Routes; and
- 15.0.3 Public Equipment and Facilities
Applicable Existing City Policies

The existing General Plan Conservation and Open Space Element (2006) lists goals, policies and programs aimed to protect the degradation to the existing visual character and its surroundings from development. The following policies and goals address potential degradation of existing visual characteristics and are discussed in detail under Impact AES-1:

- 8.6.3 Required mitigation;
- 9.1.1 Preserve natural and agricultural landscapes;
- 9.1.3 Utilities and signs;
- 9.1.4 Streetscapes and major roadways;
- 9.1.5 View protection in new development;
- 9.2.1 Views to and from public places, including scenic roadways;
- 9.2.2 Views to and from private development;
- 9.2.2 Views to and from private development;
- 9.3.2 Update Community Design Guidelines;
- 9.3.4 Environmental and architectural review;
- 9.3.5 Visual assessments;
- 9.3.6 View blockage along scenic highways;
- 9.3.8 Scenic highway designation;
- 9.3.9 Undergrounding utilities;
- 9.3.13 Monitor viewsheds;
- 9.3.11 Billboard removal;
- 9.3.12 Preserve the Morros; and
- 9.3.10 Prohibit billboards.

Please refer to the policy discussion under Impact AES-1 for the full text of the policies and programs listed above. In addition to implementation of these policies and programs, the following Conservation and Open Space Element policies and programs address potential degradation of existing visual characteristics.

9.1.2 Urban development. The City will implement the following principle and will encourage other agencies with jurisdiction to do so: urban development should reflect its architectural context.

The existing Community Design Guidelines include the following Residential Project Design and Site Design policies that address potential visual character degradation. The following policy addresses potential degradation of existing visual characteristics and is discussed in detail under Impact AES-1:

Chapter 5 - Residential Project Design

- 5.2 Subdivision Design and General Residential Project Principles.

Please refer to the policy discussion under Impact AES-1 for the full text of the Community Design Guideline policy listed above. In addition, the following Community Design Guideline policies address potential degradation of existing visual characteristics.

5.3 Infill Development.

A. General principles. Infill residential development should:

1. Be compatible in scale, siting, detailing, and overall character with adjacent buildings and those in the immediate neighborhood.

2. Continue existing neighborhood patterns. For example, patterns such as front porches and entries facing the street, finished floor height, and garages located at the rear of lots.
B. Building design. An infill residential structure should incorporate the traditional architectural characteristics of existing houses in the neighborhood, including window and door spacing, exterior materials, roof style and pitch, ornamentation and other details.

C. Visual impacts from building height. The height of infill projects should be consistent with surrounding residential structures. Where greater height is desired, an infill structure should set back upper floors from the edge of the first story to reduce impacts on adjacent smaller homes, and to protect solar access.

D. Outdoor living areas. The use of balconies, verandas, porches, and courtyards within the building form of infill structures is strongly encouraged.

E. Exterior finish materials. The thoughtful selection of building materials can enhance desired neighborhood qualities such as compatibility, continuity, and harmony. The design of infill residential structures should incorporate an appropriate mixture of the predominant materials found in the neighborhood. Common materials in San Luis Obispo are smooth, troweled, or sand-finished stucco, wood, horizontal clapboard siding, shingles, brick, and stone.

F. Exterior colors. Color schemes for infill residential structures should consider the colors of existing houses in the neighborhood, to maintain compatibility.

5.4 Multi-Family and Clustered Housing Design.

A. Site Planning.
   1. The placement of new units should consider the existing character of the surrounding residential area.

B. Parking and driveways.
   2. The main vehicle access into a multi-family site should be through an attractive entry drive. Colored and textured paving treatment is encourages outside of the public street right-of-way within the project.

C. Multi-family project architecture. The exterior design of multi-family projects should be derived from architectural styles in the surrounding neighborhood.
   1. Façade and roof articulation. A structure with three or more attached units should incorporate significant wall and roof articulation to reduce apparent scale.
   2. Scale. Because multi-family projects are usually taller than one story, their bulk can impose on surrounding uses. The larger scale of these projects should be considered within the context of their surroundings. Large projects should be broken up into groups of structures, and large single structures should be avoided.
   3. Balconies, porches, and patios. The use of balconies, porches, and patios as part of multi-family structures is encouraged for both practical and aesthetic value.
   5. Exterior Stairways. Stairways providing access to the upper levels of multi-family structures should be located mostly within the buildings themselves.

Adherence to the existing City’s General Plan, the proposed LUCE Update, and the implementing statutes of the Municipal Code/Zoning Code, Community Design Guidelines, and City’s Architectural Review Commission (ARC) policies and Guidelines, will ensure that degradation to the existing visual character and its surroundings from increased urbanization is less than significant. No additional policy direction will be required. Individual development would be required to undergo separate environmental review, which may result in specific impacts that require project specific mitigation consistent with these policies.

Mitigation Measures
Development under the LUCE Update would introduce new development in scenic areas. This could result in degradation of scenic resources or an identified visual resource or scenic vista from a public viewing area. However, the proposed and
existing City policies and programs discussed above directly address future development with the potential to degrade visual characteristics. 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. As such, with the incorporation of the proposed project and adherence to existing City policies and programs discussed above, additional mitigation is not required.

**Significance After Mitigation**

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.

**Impact AES-3**

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.

Development in accordance with the proposed LUCE Update policies could increase the ambient nighttime lighting throughout the city. Increased glare could potentially occur as a result of building materials, roofing materials, and windows reflecting sunlight. Areas that would experience the greatest potential for increased lighting are those areas likely to experience the greatest development potential. As such, impacts are considered potentially significant. However, the City’s Community Design Guidelines contain specific lighting requirements for residential and commercial land uses (discussed below). Adherence to these requirements, and those identified below, would reduce any such impacts to a less than significant level.

The proposed Airport overlay zone and compatibility criteria changes would not, in and of themselves, result in an environmental impact. However, future development in areas under the given safety zones could result in impacts and are discussed here in relation to the general development anticipated under the LUCE Update.

**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;

- **General Hospital Site:** This site is located off of Johnson Avenue, between the Urban Reserve Line and the City limit line and is adjacent to designated Open Space. This site represents the visual limit of development along the eastern boundary of the city, as the site climbs the hillside and associated Open Space to the east. Future development of the site in accordance with the LUCE Update could potentially introduce structural development that could result in new sources of light and glare;

- **Calle Joaquin Auto Sales Area:** Calle Joaquin is located parallel to Highway 101 at the southern boundary of the City, at the southern edge of the San Luis Ranch (Dalidio) Specific Plan Area. This area supports some commercial/hotel development to the south and is relatively undeveloped towards the north near San Luis Ranch. Future development along this corridor could introduce structures with the potential to introduce new sources of light and glare adjacent to a section of Highway 101 identified as a high value scenic resource; and

- **LOVR Creekside Area:** This area is located adjacent to a section of Los Osos Valley Road identified as a moderate value scenic resource. Although relatively new development in this area of the city has contributed to an increase in existing night lighting, development of the primarily undeveloped site could result in increased urbanization of the existing views along the Los Osos Valley Road and could potentially introduce new sources of light and glare.

**Proposed Circulation Element Street Network Changes**

- **Boysen Avenue and Santa Rosa Street:** This potential street improvement includes consideration of separated crossing for bikes/pedestrians of Santa Rosa Street at Boysen Avenue. This project area is part of the urban core of the city, however, the inclusion of safety features for a potential crossing could introduce new light sources for pedestrian/bike safety.

- **Transit Center Location on Santa Rosa Street and Higuera Street:** This street intersection is located within the city downtown core and represents a gateway into the commercial/retail center of the downtown core. Due to limitations on existing building heights, this site does support some public views of the open hillsides surrounding the city. Future development of a Transit Center could potentially result in the introduction of new sources of light and glare. However, it is important to note that this area is a currently developed portion of the city’s urban core. As such, the future project is likely to replace existing light and glare sources, potentially adding new sources as well;

- **Realign Madonna Road to Bridge Street Instead of Higuera Street:** This potential improvement considers an appropriate connection from Madonna to South Higuera associated with redevelopment of the Caltrans site. This site is part of the existing city urbanized core. The future realignment is likely to replace existing light and glare sources, potentially adding new sources;

- **Victoria Avenue Connection to Emily Street:** This project includes potential consideration of a Victoria Avenue connection to Emily Street. Although this area is part of the urban core of the city, new street connections have the potential to include new street and safety lighting;

- **Prado Road Interchange vs. Overpass:** This project area is located along Highway 101 at the southern boundary of the City, near San Luis Ranch (Dalidio) Specific Plan Area, just north of the Calle Joaquin Street area. The San Luis Obispo Promenade shopping center is adjacent to the site; Laguna Lake Park is located to the north, with single family residential development to the west and agricultural land with commercial development beyond. This area supports views of the rural landscape and agricultural land south of the city. Future development of an interchange or overpass along this corridor could introduce new safety/operational lighting, with the potential to result in new sources of light and glare adjacent to a section of Highway 101 identified as a high value scenic resource;
North-South Connection between Tank Farm Road and Buckley Road: This potential street improvement includes consideration of a north-south connection between Tank Farm Road and Buckley Road for future connectivity. This area is located on the southern boundary of the city, between the urbanized area of south Broad Street and South Higuera Street and consists of predominately commercial and industrial development, including the Airport. Development is not dense here and the addition of a new street connector could potentially introduce new street and safety lighting.

Buckley Road to Los Osos Valley Road Connections: This potential street improvement project includes consideration of a Buckley Road to Higuera Street connection and Higuera Street to Los Osos Valley Road behind the Los Verdes – Highway 101 bypass. This area is located along the southern and southwest boundaries of the city and the addition of a new connector street has the potential to result in new sources of street and safety lighting.

The potential addition of new sources of light and glare related to implementation of the above development area projects and street network changes would be considered significant; however, incorporation of the LUCE Update policies and existing City policies discussed below would reduce impacts to less than significant levels.

Proposed Land Use Element Specific Plan Areas

San Luis Ranch Specific Plan Area. The San Luis Ranch site is characterized primarily by its use as an agricultural property which includes seasonally planted row crops, an existing stand of eucalyptus trees in the southwest portion of the site, and the Dalidio farm home located in the northwest portion of the site. Development of the area, as outlined in the proposed LUCE Update, could result in an increase in ambient nighttime lighting through the addition of residential, commercial, and agriculture uses. This can include parking lot and security/safety lighting, and fixtures associated with the allowed structural development. Development of the area has the potential to result in significant impacts with respect to increased nighttime lighting in the project vicinity. However, implementation of the proposed LUCE Update policies, and the existing City policies identified below, would reduce impacts to less than significant levels.

Madonna on Los Osos Valley Road Specific Plan Area. This area is primarily undeveloped with some agriculture structures to support cattle grazing. The surrounding uses consist mainly of hotels, car dealerships, gas stations, restaurants, and retail outlets. Development of the area could result in increased in ambient nighttime lighting through the addition of residential and commercial uses and associated structural development in a primarily undeveloped area. However, implementation of the proposed LUCE Update policies, and the existing City policies identified below, would reduce impacts to less than significant levels.

Avila Ranch Specific Plan Area. The area is primarily undeveloped with some existing buildings along the north and west consisting of service and manufacturing uses. The County-operated airport is to the east of the Avila Ranch Specific Plan Area.

However, development of the site could result in 500 to 700 homes and 15,000-25,000 square feet of commercial space with 75 acres of open space. This increase in development could result in an increase in ambient nighttime lighting through the addition of residential and commercial uses and associated structural development. However, implementation of the proposed LUCE Update policies, and the existing City policies identified below, would reduce impacts to less than significant levels.

South Broad Street Special Planning Area. The South Broad Street Special Planning Area has been the subject of advanced planning and public outreach efforts by the City resulting in the City Council’s endorsement of the “Draft South Broad Street Area Plan” on September 17, 2013. The South Broad Street Area Plan implements General Plan policies by changing manufacturing and service commercial zones to commercial retail and service commercial designations and encourages residential mixed use.
Development of the area, as outlined in the proposed LUCE Update, could result in increased ambient nighttime lighting and glare when compared to existing conditions along the Broad Street corridor. There are areas where development would either be new (located on vacant properties), or the intensity would increase beyond existing conditions in this area. This could include increased height, as well as larger overall scale and massing. However, implementation of the proposed LUCE Update policies, the Draft Broad Street Area Plan standards and the existing City policies identified below, would reduce impacts to less than significant levels.

Applicable LUCE Update Policies
The General Plan Land Use Element Update includes goals, policies and programs to address impacts related to the addition of new sources of light and glare. The following policies address potential impacts related to the addition of new sources of light and glare.

- 1.3 Urban Edges Character;
- 2.2.11 Residential Project Objectives; and
- 4.0.19 Building Height.

Please refer to the policy discussion under Impact AES-1 for the full text of the policies and programs listed above. In addition to implementation of these policies and programs, the following Land Use Element Update policies and programs address the potential for the addition of new sources of light and glare.

**9.3.5 Urban Heat Effects.** The City shall reduce heat effects of urban development by requiring new development to incorporate, as appropriate, features such as reduced hardscape, light or heat reflective roofing, and shade trees.

**9.3.7 Sustainable Design.** The City shall promote and, where appropriate, require sustainable building practices that consume less energy, water and other resources, facilitate natural ventilation, use daylight effectively, and are healthy, safe, comfortable, and durable. Projects shall include, unless deemed infeasible by the City, the following sustainable design features.

- G. Privacy and Solar Access. New buildings outside of the downtown will respect the privacy and solar access of neighboring buildings and outdoor areas, particularly where multi-story buildings or additions may overlook backyards of adjacent dwellings.

**8.3.3.2 Upper Monterey.** In the Upper Monterey area, the emphasis will be on revitalization and enhancement. The area above Johnson shall have an emphasis on land use compatibility and neighborhood preservation. The following actions will be pursued in this area.

- h. The City will develop an Upper Monterey area master plan and design guide that will provide guidance on street enhancements, façade improvement programs, and pedestrian enhancement along Monterey Street. As part of this effort, the City will investigate the ability to apply form-based codes to guide future development and will involve residents in adjoining areas as well as business and property owners along Monterey Street as part of the public review process in development of the master plan/design guide. Particular attention will be given to creek protection, noise, safety, light and glare, and privacy impacts to adjoining neighborhoods.

The General Plan Circulation Element Update includes goals, policies and programs to address impacts related to the addition of new sources of light and glare. The following policies address potential impacts related to the addition of new sources of light and glare.

- 15.0.2 Development Along Scenic Routes; and
- 15.0.3 Public Equipment and Facilities

Please refer to the policy discussion under Impact AES-1 for the full text of the policies and programs listed above.
Applicable Existing City Policies
The existing General Plan Conservation and Open Space Element (2006) lists policies aimed to reduce impacts from new sources of light and glare. These include:

4.5.6 Solar collector appearance. The following design standards shall apply to solar collectors:

A. Solar collectors should be compatible with the appearance of the structures that contain or support them. Features of compatibility are:

1. Location within the dominant lines of the building or roof.
2. Rooftop collectors match the roof plane as closely as practical; ends of mounting racks covered with an architecturally compatible material.
3. Exposed mechanical, plumbing and structural components minimized; where visible, color is the same as roof, or a compatible color.
4. Location minimizes need to remove trees.
5. Where glare cannot be avoided by location or orientation, surface has low reflectivity.

9.2.3 Outdoor lighting. Outdoor lighting shall avoid: operating at unnecessary locations, levels, and times; spillage to areas not needing or wanting illumination; glare (intense line-of-site contrast); and frequencies (colors) that interfere with astronomical viewing.

The City of San Luis Obispo Zoning Ordinance (2013), Chapter 17, Zoning Regulations, includes development standards to reduce impacts from new sources of light and glare:

Chapter 17.08: Uses Allowed In Several Zones

17.08.072 Mixed Use Projects: This Section provides standards for the design of mixed use projects.

A. Design considerations. A mixed use project shall be designed to achieve the following objectives.

1. The design shall provide for internal compatibility between the different uses.
2. Potential noise, odors, glare, pedestrian traffic, and other potentially significant impacts on residents shall be minimized to allow a compatible mix of residential and nonresidential uses on the same site.

17.08.095 Convenience Stores.

B. Standards.

6. Performance Standards. Neighborhood grocery markets shall comply with Performance Standards, Chapter 17.18 of the Zoning Regulations. In addition, all exterior trash enclosures, outdoor storage, heating or cooling equipment, refrigerators, and similar equipment shall be visually screened, and located and/or designed to avoid noise, odor, glare, or vibration impacts to neighboring properties.

Chapter 17.18: Performance Standards

Section 17.18.030 Illumination: No lighting or illuminated device shall be operated so as to create glare which creates a hazard or nuisance on other property.

Chapter 17.23: Night Sky Preservation

17.23.010 Purpose. To establish outdoor lighting regulations that encourage lighting practices and systems that will:

1. Permit reasonable uses of outdoor lighting for nighttime safety, utility, security and enjoyment while preserving the ambience of night;
2. Curtail and reverse any degradation of the nighttime visual environment and the night sky;
3. Minimize glare and obtrusive light by limiting outdoor lighting that is misdirected, excessive, or unnecessary;

4. Help protect the natural environment from the damaging effects of night lighting;

5. Meet the minimum requirements of the California Code of Regulations for Outdoor Lighting and Signs (Title 24, Chapter 6).

Other laws or ordinances may require minimum illumination levels for specific applications and may conflict with these regulations. In such cases, those laws or ordinances shall govern.

17.23.030 Application Requirements. Whenever a person is required to obtain a building permit, electrical permit for outdoor lighting or signage, and/or approval of any development project, the applicant shall, as a part of said application, submit sufficient information to enable the Community Development Department to determine whether the proposed lighting will comply with the provisions of this Section.

17.23.040 Operational Standards. Outdoor lighting shall be designed, installed and maintained to prevent nighttime sky light pollution, preserve and enhance visibility of stars and use energy efficiently by lighting only those areas or objects necessary for safety and security.

17.23.050 New Development Standards.

17.23.060 Temporary Lighting. The Community Development Director may approve temporary lighting that is an exception to the regulations contained in this section.

17.23.070 Nonconforming Fixtures. No outdoor lighting fixture which was installed prior to the enactment of Ordinance 1527, and was consistent with Zoning Regulations at the time of installation, shall be required to be removed or modified. However, no modification or replacement shall be made to a nonconforming fixture unless the fixture thereafter conforms to the provisions of this section.

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.

No mitigation measures are required other than adherence to the City’s standard of practice regarding lighting for new development projects and its enforcement of the General Plan policies and Community Design Guidelines regarding creation of glare. No additional policy direction is required. Individual development is required to undergo separate environmental review, which may result in specific impacts that require project specific mitigation consistent with these policies.

Mitigation Measures
Development under the LUCE Update would introduce the potential for the addition of new sources of light and glare throughout the city. Increased glare could potentially occur as a result of building materials, roofing materials, and windows reflecting sunlight. Increased lighting sources could occur as a result of new structural development, and through required street and safety lighting associated with potential circulation improvement projects. However, the proposed and existing City policies and programs discussed above directly address future development with the potential to add new sources of light and glare. 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. As such, with the incorporation of the proposed project and adherence to existing City policies and programs discussed above, additional mitigation is not required.

Significance After Mitigation
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.
4.1.3. **Cumulative Impacts**

Cumulative buildout of the proposed LUCE Update includes buildout of areas within existing city boundaries, as well as buildout of the identified expansion areas. Overall, development under the General Plan would increase development intensity within the city limits, as well as undeveloped areas to a more built environment, thereby altering the fundamental character of these areas, and increasing light and glare.

By its nature, the LUCE Update considers cumulative development within the city and potential expansion areas. Thus, cumulative impacts are generally equivalent to project-specific impacts. Impacts related to aesthetic changes from specific components of the LUCE Update have been addressed individually in the paragraphs above. The combination of these impacts reflects the cumulative impacts of the proposed LUCE Update. As noted above, the existing General Plan, the proposed LUCE Update, and the Community Design Guidelines protect the city’s visual features through policies and plan review. Adherence to these requirements would reduce any impacts from buildout, as well as buildout of Specific Plan and Special Planning Areas identified in the LUCE Update to a less than significant level.
Please see the next page.
This section reviews the City of San Luis Obispo LUCE Update potential impacts with respect to agricultural resources. Specifically, changes in existing agricultural resources, prime farmlands, soils suitable for agriculture, and parcels under California Land Conservation Act contract are discussed.

### 4.2.1. Setting

The purpose of this section is to provide a setting for the city with respect to agricultural resources. The agricultural setting for the city was discussed in detail in Section 6.2, Agriculture Resources, of the corresponding City of San Luis Obispo General Plan Update Background Report. Please refer to the Background Report, which is incorporated herein by reference, for additional details with respect to the city’s agricultural resource setting.

The Background Report reviews the existing context for agricultural resources in the City of San Luis Obispo. It describes the existing agricultural resources, prime farmlands, soils suitable for agriculture, and parcels under California Land Conservation Act contract.

#### a. Regional Agricultural Production and Economic Importance to the City

The city is located in the heart of San Luis Obispo County and the Central Coast Region, both of which are important key agricultural centers within the State of California. Wine grapes and strawberries lead a list of high value specialty crops grown in the County. Refer to Figure 4.2-1 for a detailed depiction of agricultural production within the city’s LUCE SOI Planning Subarea.

The region’s agricultural industry is an important part of the local economy. It provides employment and income directly for those in agriculture, and it helps drive growth in the tourism industry, which in turn generates further economic activity and consumer spending. Total crop values increased 11% from $960 million in 2013 to $860 million in 2012, a new historical peak (see Table 4.2-1).

According to the California Employment Development Department, farm employment in San Luis Obispo County decreased 3.0% from August 2010 to August 2011. Despite farming employment declines, California’s 2011 agricultural exports increased 17% in comparison to the same period (January to August) in 2010. The following is a list of the leading San Luis Obispo County agricultural crops from an economic perspective.

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**June 2014**
Figure 4.2-1

City of SLO Planning Area Agricultural Production

Source: County of San Luis Obispo, Department of Agriculture, Crops 2012
Table 4.2-1. San Luis Obispo County Leading Agriculture Production in Dollars

<table>
<thead>
<tr>
<th>Crop</th>
<th>2013 Ranking</th>
<th>Dollar Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Grapes, Wine</td>
<td>1</td>
<td>$220,355,000</td>
</tr>
<tr>
<td>Strawberries</td>
<td>2</td>
<td>$210,579,000</td>
</tr>
<tr>
<td>Cattle and Calves</td>
<td>3</td>
<td>$96,390,000</td>
</tr>
<tr>
<td>Broccoli</td>
<td>4</td>
<td>$64,135,000</td>
</tr>
<tr>
<td>Avocados</td>
<td>5</td>
<td>$44,290,000</td>
</tr>
<tr>
<td>Vegetable Transplants</td>
<td>6</td>
<td>$33,164,000</td>
</tr>
<tr>
<td>Cut Flowers</td>
<td>7</td>
<td>$26,359,000</td>
</tr>
<tr>
<td>Indoor Decorative (Plants)</td>
<td>8</td>
<td>$19,417,000</td>
</tr>
<tr>
<td>Cauliflower</td>
<td>9</td>
<td>$14,163,000</td>
</tr>
<tr>
<td>Napa Cabbage</td>
<td>10</td>
<td>$13,431,000</td>
</tr>
</tbody>
</table>

Source: San Luis Obispo County Department of Agriculture/Weights and Measures, Top 10 Value Crops, 2013.

b. Prime Farmland and Soils

The existing General Plan includes solutions to the continued irretrievable loss of farmland resources, primarily through open space preservation, community separators, and greenbelt policies. Agricultural and resource lands are protected permanently using a variety of techniques, including fee or easement purchases, land dedications linked to granting development entitlements and donations. Since 1995, the city has protected more than more than 7,500 acres through this program. This includes land that has been purchased directly as well as open space easements. The General Plan also includes preservation of such resources, including planning based on the identification, mapping and monitoring of the community’s existing farmland. Figure 4.2-2 shows prime agricultural soils in the LUCE SOI Planning Subarea.

As shown in Figure 4.2-2, two key areas adjacent to the city contain prime soils. The San Luis Ranch property is currently in the City’s Sphere of Influence. Portions of the Airport Area Specific Plan are on prime soils, notably an area just north of Tank Farm Road designated for Services and Manufacturing, as well as a large area in the center of the Plan Area south of Tank Farm Road designated as Public land.

c. Land in Agricultural Production

There are no large tracks of land within the city limits currently in commercial agricultural production. The exception is the SLO City Farm. The SLO City Farm occupies approximately 25 acres and is located off of Highway 101 and Calle Joaquin Road. The goal of SLO City Farm is to work with local farmers who will cultivate lands, provide demonstrations and to work in partnership with educational programs and facilities that will help sustain city agricultural production. In addition, four community gardens (described in a separate section below) provide small plots of land to the public to grow small-scale agriculture, but these are within the urban context of the developed city. The largest piece of land adjacent to the city in production is the San Luis Ranch area, which is in an unincorporated area, but surrounded by the city.

d. Williamson Act Contract

There are no areas within the city limits under Williamson Act (LCA) contract. Several parcels just outside the Airport Area Specific Plan are under LCA contract, as are some undeveloped hillside parcels to the east of the city. Figure 4.2-3 shows Williamson Act parcels within the Planning Area.
City of SLO Planning Area Prime Soils in Agriculture

Source(s): 1) County of San Luis Obispo, Department of Agriculture, Crops 2012; 2) USDA, NRCS, Soils Data, 2005
e. Farmers’ Markets

The first farmers’ market in San Luis Obispo was started in July 1978 by the Economic Opportunity Commission (EOC) in the parking lot of what was Young’s Giant Food (now Stanley Motors) on Broad Street near the airport. The EOC (now called CAPSLO) handed the market over to John and Charlotte Turner the following year. Enlisting the help of others, the Turners formed the San Luis Obispo County Farmers’ Market Association. This is a mutual benefit not-for-profit corporation. In this capacity, the Association provides farmers with marketplaces, and provides the consumer fresh quality products directly from farms. The Association has grown from one market that sold $35,000 of produce in 1980 to five markets around the County with combined produce sales during 2007 of $2.2 million.

Altogether, San Luis Obispo has four weekly farmers markets (two of which are run by the Association):

- Saturday morning, in front of Cost Plus World Market in the Promenade Shopping Center
- Thursday evening, along Higuera Street downtown
- Tuesday afternoon, Broad Street, Grange Hall
- Sunday Kennedy Club Fitness

In the 1970s, the Downtown Association had long held Thursday evening for promotional events to increase downtown business. This met with limited success until 1983, when the farmers’ market was invited to join. This combination mushroomed into the weekly event filling Higuera Street with thousands of people.

f. Regulatory Setting

The City of San Luis Obispo addresses agricultural uses and compatibility with urban development through implementation of adopted policies and programs in the City’s General Plan Land Use Element and the Conservation and Open Space Element. The current General Plan policies and programs seek to maintain agricultural resources within and outside of the urban reserve line. Policies protect prime agricultural land by maintaining a strict urban growth boundary and promotion of compact residential clusters in agricultural land outside city limits. The greenbelt is an important tool of open space protection for the city. The city seeks to maintain the greenbelt by way of agricultural easements or acquisition land around the urban reserve line. Please refer to the project Background Report for a detailed discussion of the regulatory setting for agricultural resources. The impact analysis in Section 2.2 below includes City policies intended to protect agricultural resources and mitigate the effects of growth and development.

County of San Luis Obispo General Plan Agriculture Element: These policies are not binding relative to the City of San Luis Obispo, however, the County’s Agriculture Element includes policies and programs that may influence the City’s ability to annex and develop unincorporated lands that may either be designated as Agriculture, contain prime soils, or be in agricultural production. LAFCo will also consider these policies when considering any annexation request, or adjustment to the city’s existing Sphere of Influence.

San Luis Obispo Local Agency Formation Commission: This commission is a local agency that was created in 1963 to help organize, manage, and regulate the provision of public services to development at the local level. San Luis Obispo LAFCo must approve any annexation or Sphere of Influence adjustment request made by the City, based on policies that discourage sprawl, preserve prime agriculture, and ensure the provision of public services. LAFCo must consider the effect that any proposal may have on existing agricultural lands. The Cortese-Knox-Hertzberg (CKH) Act of 2000, which provides LAFCo with its authority, strongly discourages the conversion of prime agriculture land for urban development. In 2008 San Luis Obispo LAFCo adopted Agricultural Goals-Policies-Guidelines developed to help preserve agricultural resources.

Land under Williamson Act Contract: Preservation of agricultural, recreational and open space lands through agricultural preserve contracts between the County and property owners is a technique encouraged by the State. Agricultural preserve contracts are executed through procedures enabled by the California Land Conservation Act of 1965, also known as the Williamson Act. A contract may be entered into for property with agricultural and/or open space uses in return for decreased property taxes. The County Agricultural Preserve Rules of Procedure require certain minimum parcel sizes and land use restrictions applicable to agricultural preserve lands under their respective contracts. Land Conservation Act
contracts preserve agriculture and open space over a rolling term 10-year contract. The inclusion of a parcel in a Williamson Act contract is entirely voluntary, and must have the consent of the property owner.

The State Water Resources Control Board regulates water discharges from agricultural operations in California. This includes irrigation runoff, flows from tile drains, and storm water runoff. These discharges can affect water quality by transporting pollutants, including pesticides, sediment, nutrients, salts (including selenium and boron), pathogens, and heavy metals, from cultivated fields into surface waters. Many surface water bodies are impaired because of pollutants from agricultural sources. Groundwater bodies have suffered pesticide, nitrate, and salt contamination. To prevent agricultural discharges from impairing the waters that receive these discharges, the Irrigated Lands Regulatory Program (ILRP) regulates discharges from irrigated agricultural lands. This is done by issuing waste discharge requirements (WDRs) or conditional waivers of WDRs (Orders) to growers. These Orders contain conditions requiring water quality monitoring of receiving waters and corrective actions when impairments are found.

4.2.2. Impact Analysis

a. Methodology and Significance Thresholds

The assessment of agricultural impacts is determined by the conversion of prime agricultural land to non-agricultural use or impairing the productivity of prime agricultural land. The City of San Luis Obispo does not have adopted thresholds of significance for Agriculture. An impact is considered significant if the proposed development scenario development under the proposed LUCE Update would result in one or more of the following conditions:

- Involve changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use;
- Convert Prime Farmland, Unique Farmland or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use; or
- Conflict with existing zoning for agricultural use, or Williamson Act contract.

b. Project Impacts

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.

Buildout of the LUCE Update would facilitate the development and redevelopment of residential uses in areas of the city near agricultural areas. These areas include reuse of existing urbanized land and new development in areas the current General Plan envision for development near the city limits. However, this reuse and intensification would reduce potential land use conflicts as relatively few land use changes are proposed within the city that applies directly to agricultural areas or resources.

Residential development adjacent to farmland can result in impacts related to existing farm operations. Direct physical impacts include fencing and theft of agricultural products and/or equipment. Soil compaction from trespassers can also damage crop potential. Decreased air quality from adjacent urban development can also result in impacts to adjacent farmland.
Placement of residences adjacent to cultivated agriculture can also have economic impacts to growers. Increased regulations and liability insurance to protect the farmer from adjacent urban uses cost time and money. Some farmer’s sensitive to nearby residences voluntarily limit their hours of operation and do not intensively use the portions of their property closest to urban uses, in effect establishing informal buffer zones on their own property. This has the effect of lowering crop yields, which can potentially affect the long-term economic viability of the agricultural operation. This could ultimately cause the loss of agricultural production due to cessation of operations if the economic impacts become severe enough. However, implementation of the proposed LUCE Update policies, and the existing City policies identified below, would reduce potential impacts to less than significant levels.

The proposed Airport overlay zone and compatibility criteria changes would not, in and of themselves, result in an environmental impact. However, future development in areas under the given safety zones could result in impacts and are discussed here in relation to the general development anticipated under the LUCE Update.

**Proposed LUCE Update Development Special Planning 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 conflicts with agricultural uses, 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 conflicts with agricultural uses.

**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;

**Proposed Circulation Element Street Network Changes**

- **Connections to Dalidio Drive from Froom Ranch Way and/or Calle Joaquin**: This area is located west of Highway 101, south of the city, and is part of the San Luis Ranch Specific Plan area. This area is primarily in active agricultural production (row crops), with portions of the site consisting of some agricultural development and areas of undisturbed open space and riparian vegetation associated with San Luis Obispo and Prefumo Creeks. Development of a potential connector to Dalidio Drive could potentially encroach into areas of active agricultural production.

- **North-South Connection between Tank Farm Road, and Buckley Road**: Tank Farm and Buckley Roads are parallel streets located at the southern boundary of the city, with the San Luis Obispo Airport and the southern portion of the Chevron Tank Farm located between the two roads. Portions of this area are currently used for livestock grazing and production. The future development of a connector between these two road systems has the potential to be incompatible with agricultural uses.

- **Buckley Road to Los Osos Valley Road Connections**: This area is located along the southwest portion of the city, neighboring areas of relative open space, including agricultural development and some commercial and residential areas. Portions of this area between Buckley Road and Highway 101 to the west remain relatively
undeveloped and have agricultural uses. Development in this area has the potential to encroach into and be incompatible with agricultural uses.

The potential agricultural compatibility impacts related to implementation of the above development area projects and street network changes would be considered significant, however, incorporation of the LUCE Update policies and existing City policies discussed below would reduce impacts to less than significant levels.

Proposed Land Use Element Specific Plan Areas

- **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. Approximately 109 acres of the 131 acre project site are used for the production of irrigated row crops including celery, broccoli, lettuce, oriental vegetables, and peas. A vegetable packing facility, storage areas, Prefumo Creek watershed drainages, and eucalyptus trees occupy about 22 acres that have little or no agricultural production value at this time. The San Luis Obispo Promenade shopping center is located east of the site; Laguna Lake Park is located to the north; single family residential development is to the west; U.S Highway 101 is to the east and south; and agricultural land with commercial development beyond, is south of the site.

  Although the San Luis Ranch Specific Plan Area is surrounded by non-agricultural uses, development of the site could result in increased urbanization of an agricultural area and increase incompatibilities with urban and agricultural uses directly adjacent to each other. However, implementation of the proposed LUCE Update policies, and the existing City policies identified below, would reduce impacts to less than significant levels.

- **Madonna on Los Osos Valley Road Specific Plan Area**

  This site includes just over 111 acres and is located directly west of the intersection of Los Osos Valley Road and Calle Joaquin. The planned development parameters have been outlined in the proposed LUCE Update in Section 2.0, Project Description. The Madonna on Los Osos Valley Road site is characterized primarily by its use as an agricultural property (used primarily for livestock grazing) with flat grassland backed by rolling hills.

  Development of the site, as outlined in the proposed LUCE Update, could result in increased urbanization of an agricultural area and increase incompatibilities with urban and agricultural uses directly adjacent to each other. However, implementation of the proposed LUCE Update policies, and the existing City policies identified below, would reduce impacts to less than significant levels.

- **Avila Ranch Specific Plan Area**

  This site encompasses approximately 150 acres and is located on the north side of Buckley Road at the far southern edge of the city. The planned development parameters have been outlined in the proposed LUCE Update in Section 2.0, Project Description. This area is mainly undeveloped with some existing buildings along the north and west property boundaries consisting of service and manufacturing uses.

  The Avila Ranch Specific Plan Area has historically been used for agriculture, consisting primarily of livestock grazing and production. Development of this site could result in 500 to 700 homes and 15,000-25,000 square feet of commercial space with 75 acres of open space. This increase in development has the potential to impact the agriculture opportunities by increasing the urban uses adjacent to an agricultural area. However, implementation of the proposed LUCE Update policies, and the existing City policies identified below, would reduce impacts to less than significant levels.

- **South Broad Street Special Planning Area**

  The South Broad Street Special Planning Area encompasses approximately 86 acres and is bounded by the Broad Street on the west, the Union Pacific Railroad on the east, High Street to the north, and Orcutt Road to the south. Nearby services and amenities to the north include: the Regional Transit Center, Fire Station #1, Hawthorne Elementary School, and Meadow Park. To the south, there are retail shopping centers, the Maxine Lewis Memorial Shelter, and the Damon-Garcia Sports Fields facility.
Draft LUCE Program EIR

The South Broad Street Special Planning Area is an infill area within the urbanized portion of the city and does not contain any agricultural uses or areas designated for agricultural use. Therefore, impacts related to incompatibilities with urban and agricultural uses within the South Broad Street Area would be less than significant.

Applicable LUCE Update Policies
The General Plan Land Use Element Update draft includes edits to existing policies and programs for protect agricultural uses and compatibility with urban development (policy language edited as part of the LUCE Update is shown using “strikeout and underline” format), while some existing language was retained after critical review:

1.6.1 Urban Reserve. The City shall have maintain an urban reserve line containing the area around the city where urban development might occur (Land Use Element Map Diagram and Figure 2).

Urban uses within this line should only be developed according to if consistent with City-approved plans—consistent with the element. Non-urban agricultural, open space, and wildlife corridor uses are also encouraged within the urban reserve, as interim or permanent uses shown on City-approved plans.

1.6.3 Interim Uses. Expansion areas should be kept in agriculture, compatible with agricultural support services, or open-space uses until urban development occurs, unless a City-approved specific plan provides for other interim uses.

1.7.2 Greenbelt Uses. Appropriate greenbelt uses include: watershed; wildlife habitat; grazing; cultivated crops; parks and outdoor recreation (with minimal land or landscape alteration, building, lighting, paving, or use of vehicles, so rural character is maintained); and home sites surrounded by land of sufficient size and appropriately located with respect to topography and vegetation to maintain the open character.

1.7.3 Commercial Uses in Greenbelt. The City shall not allow commercial development within the greenbelt area—shall not occur—unless it is clearly incidental to and supportive of agriculture or other open space uses.

1.9.1 Basis for Variation Parcel Sizes. In the greenbelt, the City will may allow, and the City shall encourage the County to allow, smaller parcel sizes and more dwellings only when:

1. All new dwellings will be clustered contiguously in accordance with Table 1;
2. At least 90% of The site area outside the cluster is permanently protected as open space;
3. Agricultural easements are placed on prime agricultural lands outside the cluster.

1.9.3 Public Access. Areas preserved for open space should include public trail access, controlled to protect the natural resources, to assure reasonable security and privacy of dwellings, and to allow continuing agricultural operations. Public access through production agricultural land will not be considered, unless the owner agrees.

1.9.4 Design Standards. The City shall require Cluster Development shall to:

A. Be set back approximately 150 feet from public roads.
B. Be screened from public views by land forms or landscaping vegetation, but not at the expense of habitat. If the visually screened locations contain sensitive habitats or unique resources as defined in the Conservation and Open Space Element, avoid development should be avoided in those areas and instead designed the to cluster in the form of vernacular farm building complexes, to blend into the traditional agricultural working landscape.
C. Be located on other than prime agricultural land and be situated to allow continued agricultural use;
D. Preserve historic or archaeological resources.

1.15.8 Refined Planning Area Map. The City shall prepare and continue to maintain a refined Planning Area Map in the General Plan. The City will seek to establish and maintain County concurrence for the Map, which
applies to the City’s Planning Area outside the urban reserve, including the City’s sphere of influence. The map will show:

A. Areas to be kept in permanent open space, including scenic lands, sensitive wildlife habitat, and undeveloped prime agricultural land.

B. Existing uses other than open space, relatively far from the City’s urban reserve line, which may be maintained but which should not be expanded or made more intense, including institutional uses such as California Men’s Colony, Camp San Luis Obispo, and Cuesta College, and scattered residential and commercial developments.

C. Existing uses other than open space which may be considered for inclusion within the urban reserve line during the ten-year updates of this element, such as nearby groups of rural home sites.

D. Any existing uses other than open space which should be changed, relocated, or removed to allow restoration of the natural landscape or agricultural uses.

### 6.1.2 Open Space Uses

Lands designated Open Space should be used for purposes which do not need urban services, major structures, or extensive landform changes. Such uses include: watershed protection; wildlife and native plant habitat; grazing; cultivated crops; and passive recreation. The City shall require that buildings, lighting, paving, use of vehicles, and alterations to the landforms and native or traditional cultural landscapes on open space lands should be minimized, so rural character and resources are maintained. Buildings and paved surfaces, such as parking or roads, shall not exceed the following: where a parcel smaller than ten acres already exists, five percent of the site area; on a parcel of ten acres or more, three percent. (As explained in the Conservation and Open Space Element, the characteristics of an open space area may result in it being suitable for some open space uses, but not the full range.) Parcels within Open Space areas should not be further subdivided.

### 8.3.3.8 Sunset Drive-in Theater / Prado Road Area

This 2538-acre area should be further developed only if flooding can be mitigated without significant harm to San Luis Obispo Creek. Until flood hazards are mitigated, continued agricultural use and low-intensity recreational use are appropriate. Any use drawing substantial regional traffic also depends on providing a full interchange, needed infrastructure at Prado Road and extending Prado Road to connect with Madonna Road.

Once flooding, and access, and agricultural preservation issues are resolved, and agricultural preservation requirements are met, the area would be suitable for government agencies’ regional offices (see also Policy 5.1.6), development as a mixed use (horizontal or vertical) development with a mix of Commercial uses. Permanent open space shall be required in order to protect the adjacent San Luis Obispo Creek. As part of future development, a full assessment of the Drive-in Theater site’s potential as a historic resource will need to be evaluated and addressed.- Bicycle connectivity as referenced in the Bicycle Transportation Plan is an important component of future development of the area.

The site Property within the area may need to be designed to accommodate the Homeless Services center and/or transportation agency use.

### Applicable Existing City Policies

The existing General Plan Conservation and Open Space Element (2006) lists goals and policies aimed to protect agricultural uses and compatibility with urban development includes:

### 8.1 Greenbelt. Open space outside the urban area

Secure and maintain a healthy and attractive Greenbelt around the urban area, comprised of diverse and connected natural habitats, and productive agricultural land that reflects the City’s watershed and topographic boundaries.
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.

Policy 8.3.2 Open space buffers [RELEVANT PORTION].

When activities close to open space resources within or outside the urban area could harm them, the City will require buffers between the activities and the resources. The City will actively encourage individuals, organizations and other agencies to follow this policy. Buffers associated with new development shall be on the site of the development, rather than on neighboring land containing the open space resource. Buffers provide distance in the form of setbacks, within which certain features or activities are not allowed or conditionally allowed. Buffers shall also use techniques such as planting and wildlife-compatible fencing. Buffers shall be adequate for the most sensitive species in the protected area, as determined by a qualified professional and shall complement the protected area’s habitat values.

Buffers shall be required in the following situations:

   B. Between urban development and agricultural operations, to address dust, noise, odors, chemical use, and access by people and pets.
   C. Between agricultural operations and natural habitat, to address noise, chemical use, sediment transport, and livestock access.

Policy 8.5.1 Public access. Public access to open space resources, with interpretive information, should be provided when doing so is consistent with protection of the resources, and with the security and privacy of affected landowners and occupants. Access will generally be limited to non-vehicular movement, and may be visually or physically restricted in sensitive areas. Public access to or through production agricultural land, or through developed residential lots, will be considered only if the owner agrees. The City shall also designate open space areas that are not intended for human presence or activity.

Policy 8.6.1 Loss of open space. The City may permit loss of an open space resource as described in Goals 8.21 and 8.22 only when:

   A. Preserving the resource would permanently deprive the landowner of all reasonable use, and acquisition by the City or a conservation organization is not feasible, or
   B. There is a demonstrated need, based on public health, safety, or welfare, and there is no practical alternative to loss of the resource, or
   C. The resource is on a small parcel essentially surrounded by urban development, and the development contributes to the protection of agricultural land in the urban reserve or greenbelt through transfer of development credit, dedication of open space easements or fee ownership, direct funding for open space acquisition or another equally effective method, as further described in the Land Use Element.

Policy 8.6.3 Required mitigation. [RELEVANT PORTION] Loss or harm shall be mitigated to the maximum extent feasible. Mitigation must at least comply with Federal and State requirements. Mitigation shall be implemented and monitored in compliance with State and Federal requirements, by qualified professionals, and shall be funded by the project applicant.

   C. For a widespread habitat type or for farmland, mitigation shall consist of permanently protecting an equal area of equal quality, which does not already have permanent protection, within the San Luis Obispo Planning Area.

Program 8.7.1 Protect open space resources. [RELEVANT PORTIONS] The City will take the following actions to protect open space, and will encourage individuals, organizations, and other agencies to take the same actions within their areas of responsibility and jurisdiction:
A. Maintain the urban reserve line location, except where a relatively small enlargement of the urban area is tied to permanent protection of substantial open land that did not previously have assured protection.

B. Promote open space protection by annexing and applying Conservation and Open Space (C/OS) and Agriculture zoning to private property where appropriate and consistent with General Plan goals and policies.

C. Set conditions of subdivision and development approvals consistent with General Plan goals and policies.

H. Encourage sustainable agricultural practices to protect the health of human and natural communities, and to minimize conflicts between agriculture and urban neighbors, avoid grading adjacent to or within creeks and wetlands and limit livestock access within creeks and wetlands.

I. Provide information for citizens and in particular, landowners, on the values and techniques for resource protection and land conservation.

K. Avoid imposing taxes or fees that discourage retention of open space or agricultural uses.

M. Maintain the position of Natural Resources Manager so that open space functions are consolidated in one existing City department under one person.

N. The Natural Resource Manager will establish and periodically review performance standards and dimensions for buffers between open space or agricultural resources and urban uses.

Adherence to the City’s standard of practice regarding agricultural compatibility for new development projects and its enforcement of the General Plan policies regarding preservation of agricultural operations will ensure that agricultural uses and compatibility with urban development is a less than significant impact. No additional policy direction would be required. Individual development would be required to undergo separate environmental review, which may result in specific impacts that require project specific mitigation consistent with these policies.

Mitigation Measures
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 proposed and existing City policies and programs discussed above directly address future development with the potential impact agricultural uses. 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. As such, with the incorporation of the proposed project and adherence to existing City policies and programs discussed above, additional mitigation is not required.

Significance After Mitigation
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.

Impact AG-2

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.

Buildout under the Land Use and Circulation Element Update would facilitate the development and redevelopment of lands within the City of San Luis Obispo. However, none of the areas within the existing city limits are currently used for agricultural production or designated for agricultural land use, nor are any portions of the city under Williamson Act Contract. There are no large tracks of land currently in large commercial agricultural production within the city limits.

There are two key areas adjacent to the city containing prime soils (refer to Figure 4.2-2). The first is the San Luis Ranch property which is currently in the City’s Sphere of Influence. The other is portions of the Airport Area Specific Plan, notably an area just north of Tank Farm Road designated for Services and Manufacturing, as well as a large area in the
center of the site south of Tank Farm Road designated as Public land. Overall, impacts related to agricultural lands conversion within the City Limits would be less than significant.

The proposed Airport overlay zone and compatibility criteria changes would not, in and of themselves, result in an environmental impact. However, future development in areas under the given zones could result in impacts and are discussed here in relation to the general development anticipated under the LUCE Update.

**Proposed LUCE Update Development Special Planning 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 development occurring on prime farmland, unique farmland, and/or farmland of statewide importance, 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 new development occurring on prime farmland, unique farmland, and/or farmland of statewide importance.

**Proposed Land Use Element Development Special Planning Areas**

- **Los Osos Valley Road Creekside Area:** This area is located on both the north and south sides of Los Osos Valley Road, near its intersection with Highway 101 in the southwest portion of the city. This site is primarily undeveloped and designated Interim Open Space. Portions of this site, adjacent to Los Osos Valley Road, exhibit prime soils (if irrigated) and the north side of the area has been cultivated with strawberry fields in recent years. Future development of this site would have the potential to impact prime soils.

**Proposed Circulation Element Street Network Changes**

- **Connections to Dalidio Drive from Froom Ranch Way and/or Calle Joaquin:** This area is located west of Highway 101, south of the city, and is part of the San Luis Ranch Specific Plan area. This area is primarily in active agricultural production (row crops) and, as discussed below, contains areas of prime soils. The development of a connector has the potential to impact prime farmland.

- **North-South Connection between Tank Farm Road and Buckley Road:** Tank Farm and Buckley Roads are parallel streets located at the southern boundary of the city, with the San Luis Obispo Airport and the southern portion of the Chevron Tank Farm located between the two roads. The sites are located adjacent to the Avila Ranch and San Luis Obispo Creek, which contain areas of prime soils. The potential development of a connector between these two road systems could result in impacts to prime farmland.

The potential agricultural impacts related to implementation of the above development area projects and street network changes would be considered significant, however, incorporation of the LUCE Update policies and existing City policies discussed below would reduce impacts to less than significant levels.

**Proposed Land Use Element Specific Plan Areas**

- **San Luis Ranch Specific Plan Area**

  The San Luis Ranch site is characterized primarily by its use as an agricultural property. Approximately 109 acres of the site are used for the production of irrigated row crops including celery, broccoli, lettuce, oriental vegetables, and peas. A vegetable packing facility, storage areas, Prefumo Creek watershed drainages, and eucalyptus trees occupy a portion of the site that has little or no agricultural production value at this time. Copley clay soils comprise about 83 acres, and Salinas silty clay loam occupies about 26 acres of crop production land. The 109 acres of irrigated row crops are considered prime agricultural land due to their Capability Class I
and II rating and their high average gross revenue. This property is not currently under a Williamson Act or agricultural preserve contract. Development of the site, as outlined in the proposed LUCE Update, could result in conversion of the prime farmland.

Existing Land Use Element policy 1.12.7 indicates that annexations shall help secure permanent protection for areas designated Open Space and specifically states, “Dalidio Area properties (generally bounded by Highway 101, Madonna Road, and Los Osos Valley Road) shall dedicate land or easements for approximately one half of each ownership that is to be preserved as open space.” Portions of this original area are now part of the SLO City Farm and this policy is recommended for deletion in favor of more detailed performance standards proposed in Chapter 8 of the LUE to address the remaining 132 acres. These standards carry forward the required open space/agriculture dedication at a 50% minimum of the site.

A project applicant has requested consideration of allowing a portion of this 50% dedication to be met off-site. Policy direction for considering this option has not been included in the draft performance standards; however, the Council directed that if such an option were to be pursued, the applicant would need to mitigate the on-site loss of up to 10 acres to development by using the following guidance:

A substantial multiplier for the amount of open space is provided for the off-site property exchanged to meet the on-site requirement; and off-site land is of similar agricultural and visual value to the community; and off-site land is also protected through an easement, dedication or fee title in perpetuity for agriculture/open space.

Any proposal that involves replacement of on-site open space with off-site open space could result in the conversion of additional prime farmland to urban uses on this property. Such proposal has the potential to achieve protection of a greater total acreage of farmland, however, it is too speculative to determine whether impacts could be mitigated due to the lack of detail about type, location, and amount of off-site land being offered. Subsequent specific plan development would be required to undergo separate environmental review, which may result in specific impacts that require project specific mitigation consistent with these policies.

Proposed performance standards carry forward consistent direction from the existing Land Use Element and implementation of the proposed LUCE Update policies, and the existing City policies identified below, would reduce impacts to less than significant levels.

- **Madonna on Los Osos Valley Road Specific Plan Area**

  The Madonna on Los Osos Valley Road site is characterized primarily by flat grassland backed by rolling hills. The Madonna on Los Osos Valley Road Specific Plan area is used for horse grazing on the lower slopes of the property. This property is not under a Williamson Act or agricultural preserve contract. Development of the site, as outlined in the proposed LUCE Update, could result in conversion of an agricultural area to non-agricultural uses. However, implementation of the proposed LUCE Update policies, and the existing City policies identified below, would reduce impacts to less than significant levels.

- **Avila Ranch Specific Plan Area**

  This area is mainly undeveloped with some existing buildings along the north and west consisting of service and manufacturing uses. The Avila Ranch Specific Plan Area has historically been used for agriculture but is not under a Williamson Act or agricultural preserve contract. With the development of the site, as outlined in the proposed LUCE Update, future development could result in 500 to 700 homes and 15,000-25,000 square feet of commercial space with 75 acres of potential open space. As shown in Figure 4.2-2, portions of this site contain prime soils (if irrigated). This increase in development could convert the agriculture uses onsite. However, implementation of the proposed LUCE Update policies, and the existing City policies identified below, would reduce impacts to less than significant levels.

- **South Broad Street Special Planning Area**

  The South Broad Street Special Planning Area is within the urban core of the city and although portions of the city have been developed over potentially prime soils, this is a disturbed urban environment does not contain any
available prime soils/farmland, unique farmland, and/or farmland of statewide importance. Therefore, impacts related to agricultural lands conversion within the South Broad Street Area would be less than significant.

Applicable LUCE Update Policies
The proposed LUCE Update includes goals, policies and programs intended to minimize and mitigate for potential impacts to prime farmland, unique farmland, and/or farmland of statewide importance. This includes the following policies discussed under Impact AG-1, above:

- **1.6.1 Urban Reserve;**
- **1.7.3 Commercial Uses in Greenbelt;** and
- **1.9.1 Parcel Sizes.**

In addition to these policies and programs, the following LUCE Update policies and programs (policy language edited as part of the LUCE Update is shown using “strikeout and underline” format) address impacts related to prime farmland, unique farmland, and/or farmland of statewide importance and will further reduce impacts to less than significant levels:

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.

1.8.1 **Agricultural Protection.** It is the City’s policy to encourage shall support preservation of economically viable agricultural operations and land within the urban reserve and city limits. The City should provide for the continuation of farming through steps such as provision of appropriate general plan designations and zoning.

1.8.2 **Prime Agricultural Land.** The City may allow development of prime agricultural land may be permitted if the development contributes to the protection of agricultural land in the urban reserve or greenbelt by one or more of the following methods, or an equally effective method: acting as a receiver site for transfer of development credit from prime agricultural land of equal quantity; securing for the City or for a suitable land conservation organization open space or agricultural easements or fee ownership with deed restrictions; helping to directly fund the acquisition of fee ownership or open space easements by the City or a suitable land conservation organization. Development of small parcels which are essentially surrounded by urbanization need not contribute to agricultural land protection.

6.1.1 **Open Space and Greenbelt Designations.** The City shall designate the following types of land as open space:

A. Upland and valley sensitive habitats or unique resources, as defined in the Conservation and Open Space Element, including corridors which connect habitats.

B. Undeveloped prime agricultural soils which are to remain in agricultural use as provided in policy 1.8.2.

C. Those areas which are best suited to non-urban uses due to: infeasibility of providing proper access or utilities; excessive slope or slope instability; wildland fire hazard; noise exposure; flood hazard; scenic value; wildlife habitat value, including sensitive habitats or unique resources as defined in the Conservation and Open Space Element; agricultural value; and value for passive recreation.

D. A greenbelt, outside the urban reserve, that surrounds the ultimate boundaries of the urban area, and which should connect with wildlife corridors that cross the urbanized area.

E. Sufficient area of each habitat type to ensure the ecological integrity of that habitat type within the urban reserve and the greenbelt, including connections between habitats for wildlife movement and dispersal; these habitat types will be as identified in the natural resource inventory, as discussed in the "Background to this Land Use Element Update" and in Community Goal #8.

Public lands suited for active recreation will be designated Park on the General Plan Land Use Element Map. The City may establish an agricultural designation. (See the Conservation and Open Space Element for refinements of these policies.)
4.0 Environmental Impact Analysis

Applicable Existing City Policies
The existing General Plan Conservation and Open Space Element (2006) includes policies intended to minimize and mitigate for potential impacts to prime farmland, unique farmland, and/or farmland of statewide importance. The following goals, policies and programs, discussed under Impact AG-1, will reduce impacts related to prime farmland, unique farmland, and/or farmland of statewide importance:

- Policy 8.6.3 Required mitigation; and
- Policy 8.7.1 Protect open space resources.

In addition, the following Conservation and Open Space goals, programs and policies address impacts related to prime farmland, unique farmland, and/or farmland of statewide importance:

The Ahwahnee Principles. In 2005, the Council adopted Resolution No. 9689, dedicating the City to the Ahwahnee Principles and the Ahwahnee Water Principles, Chapter 10.22.2. The City believes these principles are the foundation of a safe, environmentally healthy and life-sustaining community, and intends to incorporate these principles into its General Plan and all future updates of the General Plan. The following principle relates to the protection of agricultural resources:

10. Each community or cluster of communities should have a well-defined edge, such as agricultural greenbelts or wildlife corridors, permanently protected from development.

Policy 8.1 Greenbelt. Open space outside the urban area. Secure and maintain a healthy and attractive Greenbelt around the urban area, comprised of diverse and connected natural habitats, and productive agricultural land that reflects the City’s watershed and topographic boundaries.

Policy 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 COSE], and will encourage individuals, organizations and other agencies to do likewise.

Policy 8.2.2 GOAL: Open space within the urban area. Within the urban area, the City will secure and maintain a diverse network of open land encompassing particularly valuable natural and agricultural resources, connected with the landscape around the urban area. Particularly valuable resources are:

H. Prime Agricultural soils and economically viable farmland (Figure 10)
K. Hills, ridgelines and the Morros.
L. Scenic rock outcroppings and other significant geological features.

Policy 8.3.2 Open space buffers. [RELEVANT PORTION] When activities close to open space resources within or outside the urban area could harm them, the City will require buffers between the activities and the resources. The City will actively encourage individuals, organizations and other agencies to follow this policy. Buffers associated with new development shall be on the site of the development, rather than on neighboring land containing the open space resource. Buffers provide distance in the form of setbacks, within which certain features or activities are not allowed or conditionally allowed. Buffers shall also use techniques such as planting and wildlife-compatible fencing. Buffers shall be adequate for the most sensitive species in the protected area, as determined by a qualified professional and shall complement the protected area’s habitat values. Buffers shall be required in the following situations:

B. Between urban development and agricultural operations, to address dust, noise, odors, chemical use, and access by people and pets.
C. Between agricultural operations and natural habitat, to address noise, chemical use, sediment transport, and livestock access.

Policy 8.4.1 Open space for safety. The City will preserve as Open Space, or as Agriculture, the areas listed in Goal 8.23 and will encourage individuals, organizations, and other agencies to do likewise.
Policy 8.6.3 Required Mitigation. [RELEVANT PORTIONS] Loss or harm shall be mitigated to the maximum extent feasible. Mitigation must at least comply with Federal and State requirements. Mitigation shall be implemented and monitored in compliance with State and Federal requirements, by qualified professionals and shall be funded by the project applicant.

C. For a widespread habitat type or for farmland, mitigation shall consist of permanently protecting an equal area of equal quality, which does not already have permanent protection, within the San Luis Obispo Planning Area.

G. Any development that is allowed on a site designated as Open Space or Agriculture or containing open-space resources shall be designed to minimize its impacts on open space values on the site and on neighboring land.

2. Creek corridors, wetlands, grassland communities, other valuable habitat areas, archaeological resources, agricultural land, and necessary buffers should be within their own parcel rather than divided among newly created parcels (Figure 8). Where creation of a separate parcel is not practical, the resources shall be within an easement. The easement must clearly establish allowed uses and maintenance responsibilities in furtherance of resource protection.

Policy 9.1.1 Preserve natural and agricultural landscapes. The City will implement the following policies and will encourage other agencies with jurisdiction to do likewise:

A. Natural and agricultural landscapes that the City has not designated for urban use shall be maintained in their current patterns of use.

B. Any development that is permitted in natural or agricultural landscapes shall be visually subordinate to and compatible with the landscape features. Development includes, but is not limited to buildings, signs (including billboard signs), roads, utility and telecommunication lines and structures. Such development shall:

- Avoid visually prominent locations such as ridgelines, and slopes exceeding 20 percent.
- Avoid unnecessary grading, vegetation removal, and site lighting.
- Incorporate building forms, architectural materials, and landscaping, that respect the setting, including the historical pattern of development in similar settings, and avoid stark contrasts with its setting.
- Preserve scenic or unique landforms, significant trees in terms of size, age, species or rarity, and rock outcroppings.

C. The City’s non-emergency repair, maintenance, and small construction projects in highly visible locations, such as hillsides and downtown creeks, where scenic resources could be affected, shall be subject to at least “minor or incidental” architectural review.

Policy 10.0 GOAL: Urban water needs. Meet urban water needs without substantial harm to natural communities or productive agriculture.

Adherence to the City’s standard of practice regarding agricultural soils and farmland for new development projects and its enforcement of the General Plan policies regarding preservation of farmland will ensure that development on prime farmland, unique farmland, and/or farmland of statewide importance is a less than significant impact. No additional policy direction would be required. Individual development would be required to undergo separate environmental review, which may result in specific impacts that require project specific mitigation consistent with these policies.

Mitigation Measures
Future development in accordance with the LUCE Update would occur on prime farmland, unique farmland, and/or farmland of statewide importance. However, the proposed and existing City policies and programs discussed above directly address future development with the potential impact to farmland. 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:
AG-1 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.

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. As such, with the incorporation of the proposed project, adoption of the required policy edits and adherence to existing City policies and programs discussed above, additional mitigation is not required.

Significance After Mitigation

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.

4.2.3. Cumulative Impacts

Full implementation of the proposed LUCE Update would include buildout of areas within existing city boundaries, buildout of the identified expansion areas, and additional development throughout the larger LUCE SOI Planning Subarea. This overall increase in developed area is the basis for the agricultural resource impacts identified in this section. The development identified under the LUCE Update would further reduce agricultural acreages within the LUCE SOI Planning Subarea. In general, implementation could result in the following changes:

- Incompatibilities with agricultural uses; and
- Decrease in prime farmland, unique farmland, and/or farmland of statewide importance.

The identified impacts to agricultural resources resulting from LUCE implementation have been addressed individually in the discussion above. When combined, these impacts reflect the cumulative impact of the proposed LUCE Update. As noted in the individual impact discussions, existing General Plan policies, the proposed LUCE Update, and state and federal regulations serve to protect the city's agricultural resources through policies, plan review, and regulatory compliance. Adherence to these policies and the relevant state and federal regulatory requirements would reduce any cumulative agricultural impacts resulting from the LUCE Update implementation to a less than significant level.
Please see the next page.
This section reviews the City of San Luis Obispo Land Use and Circulation Element Update’s (LUCE Update) potential impacts with respect to air quality. Specifically, short-term construction and long-term operational impacts to air quality are discussed.

4.3.1. Setting

The purpose of this section is to provide a setting for the city with respect to air quality. The air quality setting for the city was discussed in detail in Section 6.3, Air Quality, of the corresponding City of San Luis Obispo General Plan Update Background Report. Please refer to the Background Report, which is incorporated herein by reference, for additional details with respect to the city’s air quality setting.

The Background Report reviews describes the regulatory background as it relates to air quality issues and the existing conditions for air quality in the City of San Luis Obispo, as summarized below.

a. Regulatory Background

Air quality is regulated by the U.S. Environmental Protection Agency (EPA), California Air Resources Board (ARB), and San Luis Obispo County Air Pollution Control District (APCD). Each of these agencies develops rules, regulations, policies, and/or goals to comply with applicable legislation. Although EPA regulations may not be superseded, state and local regulations may be more stringent.

The Federal Clean Air Act (CAA) required EPA to establish national ambient air quality standards (NAAQS) (Table 6.3-1 of the City of San Luis Obispo General Plan Update Background Report). The CAA also required each state to prepare an air quality control plan referred to as a State Implementation Plan (SIP). The Federal Clean Air Act Amendments of 1990 added requirements for states with areas that do not comply with air quality standards (called “nonattainment areas”) to revise their SIPs to incorporate additional control measures to reduce air pollution. The SIP is modified periodically to reflect the latest emissions inventories, planning documents, and rules and regulations of the air basins as reported by their jurisdictional agencies. EPA is responsible for reviewing all SIPs to determine whether they conform to the mandates of the CAA and its amendments and whether implementation will achieve air quality goals. If the EPA determines a SIP to be inadequate, a federal implementation plan that imposes additional control measures may be prepared for the nonattainment area. If an approvable SIP is not submitted or implemented within the mandated time frame, sanctions may be applied to transportation funding and stationary air pollution sources in the air basin.

ARB is responsible for preparing and enforcing the Federally-required SIP to achieve and maintain NAAQS, as well as the California Ambient Air Quality Standards (CAAQS), which were developed as part of the California Clean Air Act (1988) (Table 6.3-1 of the City of San Luis Obispo General Plan Update Background Report). CAAQS for criteria pollutants equal or surpass NAAQS, and include other pollutants for which there are no NAAQS. ARB is also responsible for assigning air basin attainment and nonattainment designations in California. Air basins are designated as being in attainment if the levels of a criteria air pollutant meet the CAAQS for the pollutant, and are designated as being in nonattainment if the concentration of a criteria air pollutant exceeds the CAAQS. ARB is the oversight agency responsible for regulating statewide air quality, but implementation and administration of the CAAQS is delegated to several regional air pollution control districts and air quality management districts. These districts have been created for specific air basins, and have principal responsibility
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for: developing plans to comply with the NAAQS and CAAQS; developing control measures for non-vehicular sources of air pollution necessary to achieve and maintain NAAQS and CAAQS; implementing permit programs established for the construction, modification, and operation of air pollution sources; enforcing air pollution statutes and regulations governing non-vehicular sources; and developing employer-based trip reduction programs. With regards to toxic air contaminants (TACs), the Tanner Air Toxics Act (Assembly Bill [AB] 1807, Chapter 1047, Statutes of 1983) sets forth a formal procedure for ARB to designate substances and develop control measures. The Air Toxics Hot Spots Information and Assessment Act of 1987 (AB 2588, Chapter 1252, Statutes of 1987) requires stationary sources to report the types and quantities of certain substances routinely released into the air.

APCD, the lead air quality regulatory agency for San Luis Obispo County, maintains air quality comprehensive programs of planning, regulation, enforcement, technical innovation, and promotion of the understanding of air quality issues. The clean-air strategy of APCD involves the preparation of plans and programs for the attainment of CAAQS and NAAQS, adoption and enforcement of rules and regulations, and issuance of permits for stationary sources. APCD prepares a Clean Air Plan that contains a comprehensive set of control measures and a regulatory framework designed to reduce criteria air pollutants and precursors from both stationary and mobile sources (APCD 2001). The most recent version of the Clean Air Plan was developed in 2001.

APCD also inspects stationary sources to ensure they abide by permit requirements, responds to citizen complaints, monitors ambient air quality and meteorological conditions, and implements other programs and regulations required by the CAA and CCAA.

In 2009, APCD adopted guidelines for assessment and mitigation of air quality impacts under CEQA. This handbook, which has since been updated (APCD 2012a) is an advisory document that provides lead agencies, consultants, and project applicants with uniform procedures for addressing air quality issues in environmental documents.

b. Existing Conditions

The city is located in the coastal plateau area of San Luis Obispo County. Air quality in this region of the county is characteristically different than other regions of the county (i.e., the Upper Salinas River Valley and the East County Plain), although the physical features that divide them provide only limited barriers to transport pollutants between regions (APCD 2001). Local meteorological conditions recorded at the San Luis Obispo-Cal Poly Station. The annual normal precipitation is approximately 23 inches and occurs primarily from November to March. Annual maximum temperatures average approximately 69°F (WRCC 2012a). The annual predominant wind direction and mean speed is from the west-northwest at 7 miles per hour (mph) (WRCC 2012b).

The County is designated nonattainment for the one-hour CAAQS for ozone and the CAAQS for respirable particulate matter (PM_{10}) (Table 6.3-5 of the City of San Luis Obispo General Plan Update Background Report). The County is designated attainment for NAAQS (Table 6.3-5 of the City of San Luis Obispo General Plan Update Background Report). Measurements of ambient air quality from the monitoring station at 3220 South Higuera Street are representative of local air quality conditions (Table 6.3-6 of the City of San Luis Obispo General Plan Update Background Report).

The goals of AB 2588, as mentioned above, are to collect TAC emissions data, identify facilities having localized effects, and to ascertain the health risks. TACs may include diesel, formaldehyde, benzene, acetaldehyde, and polycyclic aromatic hydrocarbons. Figure 6.3-2 of the City of San Luis Obispo General Plan Update Background Report shows the locations of the AB 2588-identified facilities, which include gasoline service stations, crematories, hospitals, auto body paint shops, and dry cleaning plants. Other TAC sources include mobile exhaust, such as freeways and roadways; however, 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 (Caltrans 2012).
4.0 Environmental Impact Analysis

4.3.2. Impact Analysis

a. Methodology and Significance Thresholds

Construction and operational area-wide emissions of reactive organic gases ROG, oxides of nitrogen (NOx), PM10, and fine particulate matter (PM2.5) were estimated using the California Emission Estimator Model (CalEEMod) 2013.2, based on the description of land use changes (dwelling units and commercial square feet) associated with the LUCE Update in Section 2.0 of this EIR. Operational mobile source emissions were estimated with the most recent version of ARB’s California Emissions Factor Model (EMFAC) based on vehicle miles traveled (VMT) from the traffic analysis prepared for the LUCE Update. Short-term construction emissions were estimated for worst-case levels of development under the LUCE Update between 2015 and 2035.

Overall, in accordance with APCD recommendations, a qualitative analysis was conducted to determine if emissions resulting from implementation of the LUCE Update would be consistent with the emissions projections in the most recent version of the Clean Air Plan.

An impact is considered significant if the LUCE Update would result in one or more of the following conditions:

- Conflict with or obstruct implementation of the applicable air quality plan;
- Violate any air quality standard or contribute substantially to an existing or projected air quality violation;
- Cumulatively considerable net increase of any criteria air pollutant for which the region is in non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors);
- Expose sensitive receptors to substantial air pollutant concentrations; or
- Create objectionable odors affecting a substantial number of people.

As stated in the CEQA Appendix G, the significance criteria established by the applicable air quality management or air quality pollution control district may be relied upon to make determinations. With regard to new development, APCD has developed construction and operational thresholds of significance for criteria air pollutants. All projects that have the potential to exceed an APCD threshold must be submitted APCD for review. Short-term construction and long-term operational thresholds of significance are shown in Table 6.3-3 and Table 6.3-4 of the City of San Luis Obispo General Plan Update Background Report, respectively.

As recommended by APCD, the most appropriate standard for assessing the significance of potential air quality impacts from the LUCE 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 rationale for requiring the preparation of a consistency analysis is to ensure the attainment projections developed by the APCD are met and maintains. 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?
Impact AQ-1 (Short-Term)

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.

Construction emissions are described as “short-term” or temporary in duration and have the potential to have an adverse effect on air quality. Ozone precursor emissions (i.e., ROG and NOx) are primarily associated with gas and diesel equipment exhaust and the application of architectural coatings. Fugitive dust emissions (i.e., PM10 and PM2.5) are primarily associated with site preparation and vary as a function of such parameters as soil silt content, soil moisture, wind speed, acreage of disturbance area, and VMT by construction vehicles on- and off-site. Typical construction equipment associated with development and redevelopment projects includes dozers, graders, excavators, loaders, and trucks.

Although it is not possible to speculate on the exact type, number, location, or timing of future development projects or on the precise nature or degree of environmental impacts associated with such projects, implementation of the LUCE Update would require construction activity resulting in the generations of criteria air pollutant and ozone precursor emissions. Thus, the impact analysis below pertains to assumed levels of development contained within the LUCE Update.

Construction emissions of ROG, NOx, PM10, and PM2.5 were estimated using CalEEMod based on the description of land use changes (dwelling units and commercial square feet) associated with the LUCE Update in Section 2.0 of this EIR. Short-term construction emissions were estimated for worst-case levels of development under the LUCE Update between 2015 and 2035. Based on the modeling conducted, daily emissions of 102 pounds per day (lb/day) of ROG, 105 lb/day of NOx, 26 lb/day of PM10 (21 lb/day from fugitive and 5 lb/day from exhaust) and 13 lb/day of PM2.5 (10 lb/day from fugitive and 3 lb/day from exhaust) could result from LUCE Update-related construction activities. Refer to Air Quality Appendix for modeling input parameters and output results. These could exceed APCD’s applicable thresholds of significance for construction activities (e.g., 137 lb/day for ROG and NOx combined).

Applicable LUCE Update Policies

The LUCE Update draft does not include any edits related to construction-related air quality issues.

Applicable Existing City Policies

The existing General Plan Conservation and Open Space Element (2006) lists policies aimed to achieve and maintain air quality that supports health and enjoyment for those who live or work in the City and for visitors which include:

2.2.1 Atmospheric change. City actions shall seek to minimize undesirable climate changes and deterioration of the atmosphere’s protective functions that result from the release of carbon dioxide and other substances.

2.2.2 Health standards. Air quality should meet State and Federal standards, whichever are more protective, for human health.

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.
2.2.4 Promote walking, biking and use of public transit use to reduce dependency on motor vehicles. City actions shall seek to reduce dependency on gasoline- or diesel powered motor vehicles and to encourage walking, biking and public transit use.

2.2.5 Model City. The City will be a model of pollution control efforts. It will manage its own operations to be as pollution free as possible. The City will work with other agencies and organizations to help educate citizens in ways to prevent air pollution.

Policies contained in the existing City’s General Plan are not specific to reducing construction-generated emissions and; thus, additional mitigation measures are recommended below based on APCD guidance.

Mitigation Measures

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.

Significance After Mitigation

Individual development would be required to undergo separate environmental review, which may result in specific impacts that require project specific mitigation consistent with the most current APCD-recommended construction mitigation measures. As stated in APCD’s CEQA Air Quality Handbook, if estimated construction emissions are expected to exceed either of the APCD Quarterly Tier 2 thresholds of significance after the standard and BACT measures are accounted for, then an APCD approved CAMP and off-site mitigation would need to be implemented to reduce air quality impacts to a less-than-significant level. In addition, all fugitive dust sources shall be managed to ensure adequate control below 20% opacity as identified by Rule 401, for which compliance is required by law.

Adherence to relevant policies and implementation of APCD-recommended project-specific mitigation measures would reduce potential impacts to a less-than-significant level. Thus, construction-generated air quality impacts are considered Class II, significant but mitigable.

Impact AQ-2 (Long-Term)

Implementation of the LUCE Update would involve operation of development projects that generate long-term emissions of criteria air pollutants and ozone precursors. 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. However, 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.

As discussed above, APCD recommends 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 as the most appropriate standard for assessing the significance of potential operational air quality impacts from the LUCE Update. Each evaluation question is addressed separately below.

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?
The most current version of the Clean Air Plan includes population projections and a growth rate for the City of San Luis Obispo in Chapter 2, Planning Area and Air Basin Description, Table 2-1 and Table 2-2, respectively. The projected population for 2015 in the Clean Air Plan is 48,499, with a growth rate of 22% from 1995 to 2015. The projections in the most recent Clean Air Plan have not been updated beyond 2015; thus, the projected population associated with the LUCE Update in 2015 is used for determining consistency along with the overall growth rate. The projected population for the LUCE Update in 2015 is 46,456, as shown in Table 4 of the updated Land Use Section. This value is approximately 2,000 less than the value assumed in the Clean Air Plan. In addition, the growth rate noted in Clean Air Plan was 22% over a 20 year period from 1995 to 2015. The growth rate for the LUCE Update over a 20 year period from 2015 to 2035 would also be 22%. However, it is important to note that the 2035 projections in the LUCE Update cannot be directly compared to projections for the same year in the Clean Air Plan because year 2015 is the most recent year currently shown.

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?

Based on the traffic analysis prepared for the LUCE Update, the growth rate in VMT from 2012-2035 would be approximately 34%, which is more than the population growth rate of 22% as discussed above (an approximate increase of 2 VMT/capita).

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 land use strategies contained in the most recent version of the Clean Air Plan include:

- Planning Compact Communities;
- Providing for Mixed Land Use;
- Balancing Jobs and Housing;
- Circulation Management Policies and Programs
  - Promoting Accessibility in the Transportation System
  - Promoting Walking and Bicycling
  - Parking Management
  - Transportation Demand Management
  - Communication, Coordination, and Monitoring.

LUCE Update and in Existing City Policies relevant to the aforementioned control strategies are shown below in Table 4.3-1.
### Table 4.3-1 Clean Air Plan Control Measure Consistency with LUCE Update

<table>
<thead>
<tr>
<th>Clean Air Plan Control Measure</th>
<th>Relevant Land Use Goals, Policies, Programs</th>
<th>Relevant Circulation Goals, Policies, Programs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Planning Compact Communities</td>
<td>Goal 34 and 36; Policies/Programs 4.1, 4.0.14, and 8.2.3.5</td>
<td></td>
</tr>
<tr>
<td>Providing for Mixed Land Use</td>
<td>Goal 34; Policies/Programs 2.2.6, 2.3.3, 3.5.6, 8.3.2.4, 8.3.2.5, 8.3.3.1, 8.3.3.4, 8.3.3.8, 8.3.3.10, and 8.3.3.12</td>
<td></td>
</tr>
<tr>
<td>Balancing Jobs and Housing</td>
<td>Goal 34; Policy 1.4, 1.10.4, 4.0</td>
<td></td>
</tr>
<tr>
<td>Circulation Management Policies and Programs</td>
<td>Chapter 2 (Circulation) (includes traffic reduction, transit service, bicycle transportation, walking, multi-modal circulation, traffic management, neighborhood traffic management, street network changes, truck transportation, air transportation, rail transportation, parking management, neighborhood parking management, scenic roadways, and circulation element implementation, program funding, and management</td>
<td></td>
</tr>
<tr>
<td>Promoting Accessibility in the Transportation System</td>
<td>Transportation Goal 1; Policies/Program 3.0.2, 3.0.7, 4.1.3, 5.0.4, 6.0.A, 6.0.E, 7.17, and 13.1.1</td>
<td></td>
</tr>
<tr>
<td>Transportation Demand Management</td>
<td>1.8 Manage Traffic Goal 2; Policies/Programs 2.02, 3.1.3, 7.1.4, 8.0.5, 8.1.1, and 9.1.2</td>
<td></td>
</tr>
<tr>
<td>Communication, Coordination, and Monitoring</td>
<td>1.9 Support Environmentally Sound Technological Advancement Goal 2; Policies/Programs 1.10, 2.1.1, 3.0.1, 4.1.3, 7.1.2, and 13.1.2</td>
<td></td>
</tr>
</tbody>
</table>

**Applicable LUCE Update Policies**

Refer to Table 4.3-2 above. In addition, a majority of the circulation and land use policies/programs/goals directly or indirectly relate to air quality.

**Applicable Existing City Policies**

In addition to those noted above in Table 4.3.2, the existing General Plan Conservation and Open Space Element (2006) lists policies aimed to achieve and maintain air quality that supports health and enjoyment for those who live or work in the City and for visitors which include:

**2.2.1 Atmospheric change.** City actions shall seek to minimize undesirable climate changes and deterioration of the atmosphere’s protective functions that result from the release of carbon dioxide and other substances.

**2.2.2 Health standards.** Air quality should meet State and Federal standards, whichever are more protective, for human health.
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.

2.2.4 Promote walking, biking and use of public transit use to reduce dependency on motor vehicles. City actions shall seek to reduce dependency on gasoline- or diesel powered motor vehicles and to encourage walking, biking and public transit use.

2.2.5 Model City. The City will be a model of pollution control efforts. It will manage its own operations to be as pollution free as possible. The City will work with other agencies and organizations to help educate citizens in ways to prevent air pollution.

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). ARB’s recommendations for siting new sensitive land uses for both mobile and stationary sources of air toxics are presented in Table 6.3-2 of the City of San Luis Obispo General Plan Update Background Report and published in “Air Quality and Land Use Handbook: A Community Health Perspective.” These recommended setback distances are advisory and should not be interpreted as defined “buffer zones.” ARB recognizes the opportunity for more detailed site-specific analyses and that land use agencies have to balance other considerations, including housing and transportation needs, economic development priorities, and other quality of life issues (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. Also, it is important to note that occurrences of asbestos (natural or in older buildings) and associated exposure is regulated by APCD rules and submitting control plans as required on a project-by-project level basis.

As noted in the City of San Luis Obispo General Plan Update Background Report (6.3), existing potential odor sources in the city include a wastewater treatment plant (35 Prado Road San Luis Obispo, CA 93401), and several automotive businesses. No other major odor sources are identified. Other minor sources of odor associated with typical land uses located in commercial and industrial areas in urban communities are currently present in the city, such as restaurants, auto repair facilities, gasoline stations, manufacturing plants, and other similar uses. There are no major new sources of odor that are proposed or designated in the LUCE Update. Various commercial and industrial land uses could be developed under the LUCE Update, but these are not typically associated with major sources. In addition, implementation of the LUCE Update would not result in the placement of new sensitive receptors closer to existing sources in comparison to existing conditions.

The area is designated as an attainment area for carbon monoxide (CO) for both the CAAQS and NAAQS. Because CO emissions have substantial decreased due to increased emissions controls, several air districts (e.g., Bay Area Air Quality Management District [BAAQMD] and the Sacramento Metropolitan Air Quality Management District) have developed a conservative preliminary screening method to assess local CO emissions in comparison to the CAAQS and NAAQS. BAAQMD states that if a project would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour (or more than 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (e.g., tunnel, parking garage, bridge underpass, natural or urban street canyon, below-grade roadway) then implementation would not result in or contribute to a CO violation. Implementation of the LUCE Update would not result in the addition of vehicles to affected intersections that exceed these recommended levels.

Overall, Implementation of the LUCE Update would involve operation of development projects that generate long-term emissions of criteria air pollutants and ozone precursors. 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. However, 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 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.

**Mitigation Measures**

Implementation of the LUCE Update would involve operation of development projects that generate long-term emissions of criteria air pollutants and ozone precursors. 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. However, 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. APCD states that a Class 1 can be determined from a qualitative analysis.

**Significance After Mitigation**

Implementation of proposed and existing policies and reliance on establishment of project-specific mitigation measures where appropriate would not reduce this impact to a less-than-significant level. Thus, long-term air quality impacts are considered Class I, significant and unavoidable.

### 4.3.3. Cumulative Impacts

Cumulative buildout of the proposed LUCE Update includes buildout of areas within existing city boundaries, as well as buildout of the identified expansion areas. Overall, development under the LUCE Update would increase development intensity within the city limits, as well as undeveloped areas to a more built environment, thereby resulting in the generation of air quality-related emissions.

By its nature, the LUCE Update considers cumulative development within the city and potential expansion areas. Thus, cumulative impacts are generally equivalent to project-specific impacts. The combination of these impacts reflects the cumulative impacts of the LUCE Update. As noted above, the existing General Plan and the proposed LUCE Update protects air quality through policies and plan review. In addition, APCD thresholds of significance and consistency approach for long-term impacts are inherently cumulative in nature. Adherence to these requirements would reduce any impacts from buildout, as well as buildout of Specific Plan and Special Planning Areas identified in the LUCE Update to a less-than-significant level.
Please see the next page.
This section reviews the City of San Luis Obispo LUCE Update potential to impact biological resources. Specifically, known biological resources within the LUCE SOI Planning Subarea are identified, potential impacts to those resources are discussed, and the appropriate goals and policies that respond to these impacts are introduced.

### 4.4.1 Setting

The biological setting for the LUCE Update and SOI Planning Subarea is based on information in the Biological Resources section of the corresponding City of San Luis Obispo General Plan Update Background Report. The Background Report provides an extensive discussion of biological resources present, and how these issues are addressed in the existing General Plan. Please refer to the Background Report, which is incorporated herein by reference, for additional details regarding biological resources and issues within the LUCE SOI Planning Subarea.

#### a. Existing Conditions

The urbanized area of the City of San Luis Obispo lies at the convergence of two main geologic features: the Los Osos Valley which drains westerly into Morro Bay via Los Osos Creek, and the San Luis Valley which drains to the south-southwest into the Pacific Ocean at Avila Beach via San Luis Obispo Creek. San Luis Obispo, Stenner, Prefumo, and Brizzolara Creeks, and numerous tributary channels pass through the city, providing important riparian habitat and migration corridors connecting urbanized areas to less-developed habitats in the larger LUCE SOI Planning Subarea surrounding the city.

Much of the LUCE SOI Planning Subarea outside the city limits consist of open rangeland grazed year round, along with agricultural lands dominated by annual crop rotations and vineyards. A variety of natural habitats and associated plant communities are present within the LUCE SOI Planning Subarea, and support a diverse array of native plants and resident, migratory, and locally nomadic wildlife species, some of which are considered as rare, threatened, or endangered species. Serpentine soils and serpentine rock outcrops present within the LUCE SOI Planning Subarea typically support a high percentage of sensitive or special status plant species due to the unique chemical composition of this volcanic soil. The types and locations of habitats present are shown on Figures 4.4-1a and 4.4-1b, and listed in Table 4.4-1. As presented in Figure 4.4-1a, the largest concentrations of natural and native habitats are located in the larger LUCE SOI Planning Subarea outside the city limits.
The habitat types listed in Table 4.4-1 can be grouped by their location, their association with human uses, and potential to support biological resources. The following discussion provides a general overview of the major habitats present within the LUCE SOI Planning Subarea. Individual habitat types found in the LUCE SOI Planning Subarea are described in detail in the Biological Resources section of the Background Report.

**Urban/Developed** habitats are concentrated within and adjacent to the developed portions of the city, and in discrete areas adjacent to Highway 1 and Broad Street/Highway 227 in the larger LUCE SOI Planning Subarea (refer to Figures 4.4-1a and 1b). These areas typically provide low potential to support native plant or animal species occurrences. Within the city limits, occurrences of sensitive natural habitats are present in low-lying areas (riparian and wetland areas), and on undeveloped hills and steep slopes above the Urban Reserve or development limit lines (coastal scrub, chaparral, woodlands, and grasslands). Wildlife occurrences within urban/developed areas would consist primarily of urban-adapted avian species such as house sparrow (*Passer domesticus*) and Eurasian collared dove (*Streptopelia decaocto*) utilizing the abundant tree canopy and concentrated food sources, common animal species adapted to human presence such as raccoon (*Procyon lotor*), opossum (*Didelphis virginiana*), and striped skunk (*Mephitis mephitis*), and aquatic, semiaquatic, and terrestrial species resident in or utilizing riparian areas.

**Agriculture/Disturbed** habitats often contain or border natural habitats and species, and typically attract common wildlife species adapted to agricultural disturbance. The majority of agricultural uses including row crops, vineyards, grazing, and extractive uses such as quarrying, occur outside the city limits in the larger LUCE SOI Planning Subarea. Primary wildlife uses would be foraging by birds and mammals, nesting/roosting activities by birds and bats, and travel/migration by mammals such as coyote (*Canis latrans*), gray fox (*Urocyon cinereogargentus*), raccoon, opossum, mule deer (*Odocoileus hemionus*), and badger (*Taxidea taxus*). Limited opportunities for special-status plants could be present on the fringes of cultivated areas, along road and riparian edges, and associated with wetlands, rock outcrops and serpentine soil areas.

<table>
<thead>
<tr>
<th>Habitat Type</th>
<th>Acres within LUCE SOI Planning</th>
<th>Acres within City Limits</th>
</tr>
</thead>
<tbody>
<tr>
<td>Oak Woodland</td>
<td>5,183.1</td>
<td>353.1</td>
</tr>
<tr>
<td>Eucalyptus Grove</td>
<td>78.3</td>
<td>78.3</td>
</tr>
<tr>
<td>Forest</td>
<td>56.4</td>
<td>0</td>
</tr>
<tr>
<td>Riparian</td>
<td>3,213.9</td>
<td>105.5</td>
</tr>
<tr>
<td>Coastal Scrub</td>
<td>5,243.2</td>
<td>178.7</td>
</tr>
<tr>
<td>Chaparral</td>
<td>3,946.4</td>
<td>430.0</td>
</tr>
<tr>
<td>Non-Native Grassland</td>
<td>39,482.6</td>
<td>993.6</td>
</tr>
<tr>
<td>Native Perennial Grassland</td>
<td>818.7</td>
<td>442.0</td>
</tr>
<tr>
<td>Agriculture/Disturbed Areas</td>
<td>7,241.1</td>
<td>285.6</td>
</tr>
<tr>
<td>Urban/Developed Areas</td>
<td>7,093.1</td>
<td>869.1</td>
</tr>
</tbody>
</table>

*Source(s):* Modified from City of San Luis Obispo Geographic Information Systems Department; CDFW, CNDDB Natural Communities of Special Concern August 2012;
Figure 4.4-1a
Planning Area Habitat Map

Modified from sources: City of San Luis Obispo Geographic Information Systems Department; California Department of Fish and Game, California Natural Diversity Database, August 2012; Aerial Information Systems, Inc. for the County of San Luis Obispo Planning and Building Department, 2007.
Figure 4.4-1b
City of San Luis Obispo Habitat Map

Modified from sources: City of San Luis Obispo Geographic Information Systems Department; California Department of Fish and Game, California Natural Diversity Database, August 2012; Aerial Information Systems, Inc. for the County of San Luis Obispo Planning and Building Department, 2007.
4.0 Environmental Impact Analysis

Riparian/Wetland habitats include streams, lakes, ponds, and associated natural vegetation adapted to increased soil moisture, and have a high potential to contain special status plant and animal species. Major examples include San Luis Obispo, Stenner, Brizzolara, and Prefumo Creeks, Laguna Lake, and many smaller tributary drainages. These features and habitats pass through and border all other habitat types present in the LUCE SOI Planning Subarea, and could be significantly impacted by LUCE implementation. Special status species potentially present in these areas include steelhead - South/central California Coast Distinct Population Segment (DPS) (*Oncorhynchus mykiss irideus*), California red-legged frog (*Rana draytonii*), southwestern pond turtle (*Actinemys marmorata*), and San Luis Obispo sedge (*Carex obispoensis*).

Terrestrial habitat types present include woodland, forest, chaparral, scrub, and grassland areas. These habitats are typically present above the Urban Reserve or development limit lines on rocky hills and steep slopes, in currently designated Open Space areas, and adjacent to riparian areas. Many urban and agricultural areas border one or more of these natural habitats. Many of the common wildlife species listed above frequent these terrestrial habitats. Additional species likely to be present include western gray squirrel (*Sciurus griseus*), California ground squirrel (*Spermophilus beecheyi*), Nuttall’s woodpecker (*Picoides nuttallii*), steller’s jay (*Cyanocitta stelleri*), great horned owl (*Bubo virginianus*), and red-shouldered hawk (*Buteo lineatus*). These areas have moderate to high potential to provide habitat for special-status plant and animal species, and very high potential for presence of nesting birds.

b. Special-Status Species and Natural Communities

Special-status species are those plants and animals listed, proposed for listing, or candidates for listing as threatened or endangered by the U.S. Fish and Wildlife Service (USFWS) or the National Marine Fisheries Service (NMFS) under the federal Endangered Species Act (FESA); those considered “species of concern” by the USFWS; those listed or proposed for listing as rare, threatened, or endangered by the California Department of Fish and Wildlife (CDFW), under the California Endangered Species Act (CESA); animals designated as “Species of Special Concern” by the CDFW; and plants with a California Rare Plant Rank of 1 or 2. Plants with a California Rare Plant Rank of 3 (rare in California but common elsewhere) and 4 (a watch list) typically do not meet the CEQA thresholds of rarity. Natural Communities of Special Concern are habitat types considered rare and worthy of tracking in the California Natural Diversity Data Base (CNDDB) maintained by the CDFW because of their limited distribution or historic loss over time.

Several special status habitats types, and special-status plant and animal taxa have been recently or historically known to occur in the LUCE SOI Planning Subarea. The term “special-status species” is used throughout this section and includes plants and animals that are officially listed by a regulatory organization or agency as well as those considered to be of local concern or interest by recognized public resource agencies such as the CDFW and USFWS, and monitoring organizations such as California Native Plant Society (CNPS) or Audubon Society.

Legal Definitions of Special-Status Species. Special-status species are plants and animals that are legally protected under the California and federal ESAs or other regulations, and species that are considered sufficiently rare by the scientific community to qualify for such listing. Special-status plants and animals are species in the following categories:

- Species listed or proposed for listing as threatened or endangered under ESA (50 CFR 17.12 [listed plants], 50 CFR 17.11 [listed animals], and various notices in the *Federal Register* (FR) [proposed species]);
- Species that are candidates for possible future listing as threatened or endangered under ESA (61 FR 7596–7613, February 28, 1996);
- Species listed or proposed for listing by the State of California as threatened or endangered under the California ESA (14 CCR 670.5);
- Species that meet the definitions of rare, threatened, or endangered under CEQA (State CEQA Guidelines, Section 15380);
- Plants listed as rare or endangered under the California Native Plant Protection Act (California Fish and Game Code, Section 1900 et seq.);
- Plants considered by the California Native Plant Society (CNPS) to be “rare, threatened, or endangered in California” (California Rare Plant Ranks 1 and 2);
Plants listed by CNPS as plants about which more information is needed to determine their status and plants of limited distribution (California Rare Plant Ranks 3 and 4) may be included as special-status species on the basis of local significance or recent biological information;

- Animal species of special concern to DFG (PRBO and DFG 2001 [birds], Williams 1986 [mammals], and Jennings and Hayes 1994 [amphibians and reptiles]); and

- Animals fully protected in California (California Fish and Game Code, Section 3511 [birds], 4700 [mammals], and 5050 [reptiles and amphibians]).

The search and review of the CNDDB conducted for the Background Report revealed 30 special-status plant species, four natural communities of special concern, and 20 special-status wildlife species with recorded occurrences within a 10-mile search radius of the LUCE SOI Planning Subarea. Portions of the northern and eastern LUCE SOI Planning Subarea are located in California red-legged frog (CRLF) **Critical Habitat Unit SLO-3—Willow and Toro Creeks to San Luis Obispo.**

Figures 4.4-2 and 4.4-3 show the CNDDB plant and wildlife special-status species recorded occurrences within the LUCE SOI Planning Subarea. Tables 4.4-2 and 4.4-3 show the scientific and common names and listing status for the special-status species present or with potential to occur in the LUCE SOI Planning Subarea. Additional species information is presented in the Background Report. Focused biological surveys have not been conducted over the entire LUCE SOI Planning Subarea, and therefore, additional, previously unidentified species or habitats could also occur. Site-specific surveys for any potentially sensitive species and habitats would be necessary to confirm presence/absence within a particular area prior to any development under the LUCE Update.
Figure 4.4-2

CNDDB Botanical Occurrences within Planning Area

Source: California Department of Fish and Game, California Natural Diversity Database, August 2012
Figure 4.4-3

CNDDDB Wildlife Occurrences within Planning Area

Source: California Department of Fish and Game, California Natural Diversity Database, August 2012
The following special status species shown in Tables 4.4-2 and 4.4-3 have the potential to occur, or have been observed within the LUCE SOI Planning Subarea.

Table 4.4-2  Special Status Plant Species and Natural Communities of Special Concern in the LUCE SOI Planning Subarea

<table>
<thead>
<tr>
<th>Species Name</th>
<th>Federal Status</th>
<th>State Status</th>
<th>Global Rank</th>
<th>Subnational Rank</th>
<th>CNPS/CRPR</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hoover's button-celery</td>
<td></td>
<td></td>
<td>G5T2</td>
<td>S2.1</td>
<td>1B.1</td>
</tr>
<tr>
<td><em>Eryngium aristulatum var. hooveri</em></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>adobe sanicle</td>
<td></td>
<td>Rare</td>
<td>G2</td>
<td>S2.2</td>
<td>1B.1</td>
</tr>
<tr>
<td><em>Sanicula maritima</em></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>San Luis Obispo fountain thistle</td>
<td>Endangered</td>
<td>G2T1</td>
<td>S1.2</td>
<td></td>
<td>1B.2</td>
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<td>Miles' milk-vetch</td>
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<td>Pismo clarkia</td>
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<td>Rare</td>
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<td><em>Trifolium depauperatum var.</em></td>
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<td><em>hydrophilum</em></td>
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<td>San Benito fritillary</td>
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<td><em>Fritillaria viridea</em></td>
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<td>San Luis Obispo owl's-clover</td>
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<td><em>Castilleja densiflora ssp.</em></td>
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<td><em>obispoensis</em></td>
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<td>San Luis Obispo sedge</td>
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<td><em>Carex obispoensis</em></td>
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<td>Santa Lucia manzanita</td>
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<td>S2.2</td>
<td>1B.2</td>
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<td><em>Arctostaphylos luciana</em></td>
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<td>Serpentine Bunchgrass</td>
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<td><strong>Wells’ manzanita</strong></td>
<td>G1G2</td>
<td>S1S2</td>
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<td><em>Arctostaphylos wellsii</em></td>
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</table>

**Global (G) Conservation Status Ranking**

G1  **Critically Imperiled**—At very high risk of extinction due to extreme rarity (often 5 or fewer populations), very steep declines, or other factors.

G2  **Imperiled**—At high risk of extinction or elimination due to very restricted range, very few populations, steep declines, or other factors.

G3  **Vulnerable**—At moderate risk of extinction or elimination due to a restricted range, relatively few populations, recent and widespread declines, or other factors.

G4  **Apparently Secure**—Uncommon but not rare; some cause for long-term concern due to declines or other factors.

G5  **Secure**—Common; widespread and abundant.

**National (N) and Subnational (S) Conservation Status Ranking**

N1  **Critically Imperiled**—Critically imperiled in the jurisdiction because of extreme rarity or because of some factor(s) such as very steep declines making it especially vulnerable to extirpation from the jurisdiction.

N2  **Imperiled**—Imperiled in the jurisdiction because of rarity due to very restricted range, very few populations, steep declines, or other factors making it very vulnerable to extirpation from jurisdiction.

N3  **Vulnerable**—Vulnerable in the jurisdiction due to a restricted range, relatively few populations, recent and widespread declines, or other factors making it vulnerable to extirpation.

N4  **Apparently Secure**—Uncommon but not rare; some cause for long-term concern due to declines or other factors.

N5  **Secure**—Common; widespread and abundant.

**California Native Plant Society Status Ranking**
1A  Plants Presumed Extinct in California
1B  Plants Rare, Threatened, or Endangered in California and Elsewhere
2  Plants Rare, Threatened, or Endangered in California, But More Common Elsewhere
3  Plants About Which We Need More Information - A Review List
4  Plants of Limited Distribution - A Watch List

**Threat Ranks**

0.1  Seriously threatened in California (over 80% of occurrences threatened / high degree and immediacy of threat)
0.2  Fairly threatened in California (20-80% occurrences threatened / moderate degree and immediacy of threat)
0.3  Not very threatened in California (<20% of occurrences threatened / low degree and immediacy of threat or no current threats known)

**Table 4.4-3 Special Status Wildlife Species in the LUCE SOI Planning Subarea**

<table>
<thead>
<tr>
<th>Species</th>
<th>Federal Status</th>
<th>State Status</th>
<th>Global rank</th>
<th>State rank</th>
<th>CDFW</th>
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</thead>
<tbody>
<tr>
<td>California red-legged frog <em>Rana draytonii</em></td>
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<td>G4T2T3</td>
<td>S2S3</td>
<td>SC</td>
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<tr>
<td>white-tailed kite <em>Elanus leucurus</em></td>
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<td>S3</td>
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<td>ferruginous hawk <em>Buteo regalis</em></td>
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<td>S3S4</td>
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<td>prairie falcon <em>Falco mexicanus</em></td>
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<td>S3</td>
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<td>western yellow-billed cuckoo <em>Coccyzus americanus occidentalis</em></td>
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<td>Endangered</td>
<td>GST3Q</td>
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<tr>
<td>burrowing owl <em>Athene cunicularia</em></td>
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<td>S2</td>
<td>SC</td>
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<tr>
<td>California horned lark <em>Eremophila alpestris actia</em></td>
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<tr>
<td>tricolored blackbird <em>Agelaius tricolor</em></td>
<td>G2G3</td>
<td>S2</td>
<td>SC</td>
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<td>steelhead - south/central California coast ESU <em>Oncorhynchus mykiss irideus</em></td>
<td>Threatened</td>
<td>GST2Q</td>
<td>S2</td>
<td>SC</td>
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<tr>
<td>Townsend's big-eared bat <em>Corynorhinus townsendii</em></td>
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<td>S2S3</td>
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<td>palid bat <em>Antrozous pallidus</em></td>
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<td>western mastiff bat <em>Eumops perotis californicus</em></td>
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<td>S3?</td>
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<td>American badger <em>Taxidea taxus</em></td>
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<td>southwestern pond turtle <em>Actinemys (=Emys) marmorata pallida</em></td>
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<td>black legless lizard <em>Anniella pulchra nigra</em></td>
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<td>silvery legless lizard <em>Anniella pulchra pulchra</em></td>
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<td>vernal pool fairy shrimp <em>Branchinecta lynchi</em></td>
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<td>G3</td>
<td>S2S3</td>
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<td>California linderiella <em>Linderiella occidentalis</em></td>
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<td>S2S3</td>
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<td>Atascadero June beetle <em>Polyphylla nubila</em></td>
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<td>S1</td>
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<tr>
<td>monarch butterfly</td>
<td>G5</td>
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4.0  Environmental Impact Analysis

June 2014
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<thead>
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<th>State Status</th>
<th>Global rank</th>
<th>State rank</th>
<th>CDFW</th>
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<tr>
<td>Danaus plexippus</td>
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<td>San Luis Obispo pyrg</td>
<td></td>
<td></td>
<td>G1</td>
<td>S1</td>
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<td>Pyrgulopsis taylori</td>
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</table>

**Global (G) Conservation Status Ranking**

- **G1 Critically Imperiled**—At very high risk of extinction due to extreme rarity (often 5 or fewer populations), very steep declines, or other factors.
- **G2 Imperiled**—At high risk of extinction or elimination due to very restricted range, very few populations, steep declines, or other factors.
- **G3 Vulnerable**—At moderate risk of extinction or elimination due to a restricted range, relatively few populations, recent and widespread declines, or other factors.
- **G4 Apparently Secure**—Uncommon but not rare; some cause for long-term concern due to declines or other factors.
- **G5 Secure**—Common; widespread and abundant.

**National (N) and Subnational (S) Conservation Status Ranking**

- **N1 Critically Imperiled**—Critically imperiled in the jurisdiction because of extreme rarity or because of some factor(s) such as very steep declines making it especially vulnerable to extirpation from the jurisdiction.
- **N2 Imperiled**—Imperiled in the jurisdiction because of rarity due to very restricted range, very few populations, steep declines, or other factors making it very vulnerable to extirpation from jurisdiction.
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- **N4 Apparently Secure**—Uncommon but not rare; some cause for long-term concern due to declines or other factors.
- **N5 Secure**—Common; widespread and abundant.

**SC- Species of Special Concern** by the CDFW.

Table 4.4-4 below provides a summary of general biological constraints and regulatory oversight associated with natural habitat types present within the LUCE SOI Planning Subarea. Additional information is present in the Background Report.
Table 4.4-4. Natural Habitat Constraints Summary

<table>
<thead>
<tr>
<th>Habitat Type</th>
<th>General Constraints</th>
<th>Special-status Species Associations</th>
</tr>
</thead>
</table>

Species associations are based on presence of suitable habitat and known occurrences listed in the CNDDB. Many other species, including migratory birds, have potential to occur in the LUCE SOI Planning Subarea on a periodic basis.

c. Regulatory Setting

Biological resources in the San Luis Obispo LUCE SOI Planning Subarea are protected by a hierarchy of Federal, State and local regulations. All development consistent with the General Plan is required to comply with local, state, and federal laws and policies and all applicable permitting requirements of the regulatory and oversight agencies intended to address potential impacts on biological resources, including special-status species and habitats. All development within or adjacent to any biological resource regulated by the agencies and laws listed below is required to meet the specific regulatory requirements and obtain all necessary permits for protecting and maintaining that resource. Please refer to
the Biological Resources section of the Background Report for detailed discussions of specific regulations and agencies, and the regulatory environment as it relates to biological resource issues.

Federal Laws and Regulations

- **Federal Endangered Species Act.** The U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS) are the agencies that oversee the Federal Endangered Species Act (FESA). The NMFS is responsible for the protection of marine mammals, marine fishes, and anadromous fishes, whereas all other species are regulated by the USFWS.

- **Federal Clean Water Act, Section 404, Discharge of Dredged of Fill Material in Waters of the U.S.** The Clean Water Act (CWA) is the primary Federal law that protects the quality of the nation’s waters, including wetlands, lakes, rivers, and coastal areas.

- **Federal Clean Water Act, Section 401—Water Quality Certification.** Under the CWA Section 401, applicants for a Federal license or permit to conduct activities that may result in the discharge of a pollutant (including dredged or fill material) into waters of the United States must obtain certification from the state in which the discharge would originate.

- **Migratory Bird Treaty Act.** The Migratory Bird Treaty Act of 1918, as amended (MBTA), implements various treaties and conventions between the U.S. and Canada, Japan, Mexico, and the former Soviet Union for the protection of migratory birds.

- **Bald and Golden Eagle Protection Act.** The Bald and Golden Eagle Protection Act prohibits the taking or possession of and commerce in bald and golden eagles, with limited exceptions.

- **National Environmental Policy Act.** The National Environmental Policy Act (NEPA) requires Federal agencies to include in their decision-making process appropriate and careful consideration of all environmental effects of a proposed action and of possible alternatives. Projects with a component of federal funding, and those requiring a permit from a federal agency, must comply with NEPA.

State Laws and Regulations

- **California Endangered Species Act.** Administered by the California Department of Fish and Wildlife (CDFW), California ESA prohibits the take of listed species and also species formally under consideration for listing ("candidate" species) in California.

- **Natural Community Conservation Planning Act (NCCP).** The NCCP Act was enacted to implement broad-based planning to provide for effective protection and conservation of California’s wildlife heritage while continuing to allow appropriate development and growth.

- **State Fish and Game Code Section 1600-1616—Master Streambed Alteration Agreement for Streambed Modifications.** CDFW has jurisdictional authority over streams, lakes, and wetland resources under California Fish and Game Code Section 1600 et seq.

- **California Fully Protected Species.** Under the California Fish and Game Code, fully protected species may not be taken or possessed at any time, and no licenses or permits may be issued for their take except for collecting these species for necessary scientific research and relocation of bird species for the protection of livestock.

- **California Environmental Quality Act.** CEQA is similar to, but more extensive than NEPA in that it requires significant environmental impacts of proposed projects be reduced to a less-than-significant level through adoption of feasible avoidance, minimization, or mitigation measures unless overriding considerations are identified.

- **California Fish and Game Code 3503 (Bird Nests).** Section 3503 of the California Fish and Game Code makes it “unlawful to take, possess, or needlessly destroy the nests or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto.”
Local Regulations

City of San Luis Obispo General Plan Conservation and Open Space Element

The City's General Plan contains numerous goals and policies that apply to the protection of natural resources within city boundaries. The protection and management of biological resources by the City is integrated into the General Plan Conservation and Open Space Element, consisting of a single management regulatory document that comprehensively addresses watershed protection measures, open space guidelines, water quality requirements, species and habitat protection, creek setbacks, and establishes required mitigation ratios for unavoidable impacts to natural resources. Applicable General Plan Conservation and Open Space Element policies are listed in the impact discussion.

City of San Luis Obispo Stormwater Program

The City of San Luis Obispo is regulated under the National Pollutions Discharge Elimination System (NPDES) permit administered by the local Regional Water Quality Control Board under direction from the State Water Quality Control Board. These agencies approve 5-year permit terms where specific measures and programs will be implemented to protect water quality and the aquatic habitat and species that rely on it.

Other City of San Luis Obispo Programs

Consistent with the General Plan, the City has also adopted several open space conservation plans for different portions of the city containing special status biological resources. These further expand on policy direction included in the General Plan, and provide a framework for managing specific open space resource areas, with a focus on habitat protection. These documents include:

- Bishop Peak Natural Reserve Open Space Conservation Plan (July 2004)
- Cerro San Luis Natural Reserve Open Space Conservation Plan (September 2005)
- South Hills Natural Reserve Open Space Conservation Plan (July 2007)
- Johnson Ranch Open Space Conservation Plan (January 2008)
- Stenner Springs Natural Reserve Conservation Plan (July 2009)
- Irish Hills Natural Reserve Open Space Conservation Plan (June 2011)
- Reservoir Canyon Natural Reserve Conservation Plan (2012)

4.4.2 Impact Analysis

a. Methodology and Significance Thresholds

The California Environmental Quality Act (CEQA), Chapter 1, Section 21001 (c) states that it is the policy of the state of California to: “Prevent the elimination of fish and wildlife species due to man’s activities, ensure that fish and wildlife populations do not drop below self-perpetuating levels, and preserve for future generations representations of all plant and animal communities.” Project impacts to flora and fauna may be determined to be significant even if they do not directly affect rare, threatened or endangered species.

Significant impacts to biological resources may occur if a project action would:

- Conflict with local or regional conservation plans or state goals;
- Substantially affect rare, threatened or endangered species;
- Interfere substantially with the movement of any resident or migratory fish or wildlife species;
- Substantially diminish habitat for fish, wildlife or plants;
- Involve the use, production or disposal of materials which pose a hazard to animal or plant populations in the area affected; or
- Have impacts which are individually limited, but cumulatively considerable; or involve the alteration or conversion of biological resources (locally important species or locally important communities) identified as significant within the county or region.
When assessing or applying these threshold guidelines, plants and animals may be considered locally important if any of the following criteria are met:

- The species, subspecies or variety is limited in distribution in the county or region, and endemic (limited to a specific area) in the region;
- The species population is at the extreme limit of its overall distribution or is disjunct from the known overall range;
- The species potentially affected by project actions has habitat requirements or limitations which makes it susceptible to local extirpation as a consequence of those actions, the introduction of barriers or restrictions to movement, changes in ambient conditions, or increases in human activity;
- Populations which exhibit unusual localized adaptations, or are high quality examples of the species overall;
- Taxa which are considered special-status by recognized biological experts and monitoring groups, such as the California Native Plant Society and Audubon Society.

Plant communities or habitat types may be considered locally important (usually at the discretion of the affected jurisdiction) if they meet any of the following criteria:

- Formations or habitat types of singular or limited occurrence within the jurisdictional boundaries;
- Formations or habitat types which provide critical or essential support resources for rare, threatened or endangered or locally important species;
- Formations, habitat types or geographic areas which serve as wildlife movement routes or habitat linkages between substantial, intact open space areas;
- Formations or habitat types which are recognized or designated as pristine or highest quality examples of a particular type within a jurisdiction;
- Specific sites which are type localities for plant or animal species;
- Formations or habitat types considered sensitive by recognized biological experts and monitoring groups, such as the CNPS, California Natural Diversity Data Base, The Nature Conservancy, or CDFW;
- Ephemeral or perennial wetlands which have been defined as areas which sporadically, seasonally or perennially serve to transmit, conduct or impound water, making it available for use by wildlife and/or facultatively dependent associations of plants and animals (such as vernal pools).

b. Project Impacts

LUCE Update implementation has the potential to impact a variety of biological resources within and adjacent to the LUCE SOI Planning Subarea. Potential impacts to biological resources would occur where proposed construction or development activities result in temporary or permanent modification of natural communities or habitats, or areas occupied by native plant and wildlife species. General construction activities including grading, trenching, grubbing and paving as well as ongoing commercial, residential, recreational, and agricultural uses associated with implementation have the potential to directly impact terrestrial plant communities including oak woodlands, scrub, chaparrals, and grasslands, riparian and wetland habitats, and both common and special-status plant and animal species. Riparian and aquatic resources within and adjacent to the city could also be indirectly impacted by erosion and sedimentation, vegetation removal, increased human presence, and by increased storm water runoff containing pollutants, including residual hydrocarbons, fertilizers, pet wastes, and other chemicals that are commonly used in residential and agricultural developments.

Although the LUCE Update provides general development parameters, the timing and extent of potential future development within the expansion areas has not been formalized through the development approval process. As each development site is unique and each project’s impact on biological resources is dependent upon the project site, specific biological impacts and mitigation measures cannot be determined in this program level EIR. In addition, listing status, regulatory requirements, and mitigation ratios, are likely to change over time. Therefore, this section describes the generalized effects of development in the LUCE SOI Planning Subarea, and provides policy level impact and mitigation discussions appropriate for a General Plan analysis. The information contained in this EIR section and the Background Report regarding the potential occurrence and listing status of special-status species plants and wildlife, and sensitive
4.0 Environmental Impact Analysis

Communities should be considered a basis or starting point to determine the need for individual environmental review of specific projects proposed under the LUCE Update.

### 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.**

As documented in Table 4.4-1, the city and surrounding environment contains over 39,482 acres of annual grassland, and 7,241 acres of agriculture/disturbed habitats. Included in these totals are 993 acres of annual grassland, and 285 acres of agriculture/disturbed habitats located within the city limits. Annual grasslands and disturbed areas are not considered sensitive or special status habitats by the CDFW, and typically support only common plant and wildlife species. Common habitat types such as annual grasslands do have the potential to support special-status plants and provide nesting and foraging opportunities for avian species subject to the Migratory Bird Treaty Act (MBTA).

Future development has the potential to impact common natural habitat types present within the LUCE SOI Planning Subarea. The proposed Airport overlay zone and compatibility criteria changes would not, in and of themselves, result in an environmental impact. However, future development in areas under the overlay zone could result in impacts.

Development actions will be required to have a site specific biological resources report prepared to ensure compliance with local, state, and federal laws and policies and applicable permitting requirements of the regulatory and oversight agencies listed in Section 4.4.1d, Regulatory Setting. If individual project environmental review determines that nesting birds or special-status species are not present, impacts to non-native grassland and disturbed areas outside of the Greenbelt and designated open space areas would be considered less than significant pursuant to CEQA, and mitigation would not be required to offset the impacts associated with project development under the LUCE Update.

As noted in the Land Use Element, “Most of the land within the City’s Greenbelt, but outside the City limits (unincorporated lands), is designated by the County for Agriculture or Open Space. The City supports these land use designations and discourages any further subdivision of existing parcels unless such subdivision is expressly part of strategy to permanently preserve agriculture and/or open space. However, if any new lots are permitted apart from such a strategy, they should be a minimum of 20 acres in size or greater.” (Land Use, 1-31) More intensive development within the Greenbelt and designated open space areas would require a General Plan amendment and subsequent project-specific biological analysis and is too speculative for this EIR.

Under the current and proposed policies, and the regulatory framework governing natural habitat protection and sensitive species, potential impacts to common habitat types within the LUCE SOI Planning Subarea are considered potentially significant but mitigable.

### Proposed LUCE Update Development Proposed and Specific Planning 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 disturbance of common habitat types, it is important to note that these projects have not been fully developed through the advanced planning process. 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 Section 2.0 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 potential adverse effects to common habitat types.
Proposed Land Use Element Development Special Planning Areas

- **General Hospital Site:** This area is located along the eastern boundary of the city, near the intersection of Johnson Avenue and Bishop Street and represents an urban interface with the hillsides and designated Open Space to the east. The area located behind the existing General Hospital is in direct proximity to common habitats discussed above. Future development in this area has the potential to result in the disturbance of common habitats;

- **Los Osos Valley Road (LOVR) 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). This site is primarily undeveloped and serves as a gateway to designated Open Space to the west. Undisturbed portions of the site likely contain common habitats discussed. Future development of this area has the potential to result in impacts to these habitats;

- **Broad Street @ Tank Farm Road Site:** This site is located at the southern limit of the city, representing the historic limits to the city when the area was predominantly agricultural in nature. Portions of this area, specifically the northwest corner of the intersection of Tank Farm Road and Broad Street, have seen relatively low levels of development or disturbance. Undisturbed portions of this area have the potential to support the common habitats discussed above. As such, future development of this area has the potential to impact common habitats.

Proposed Circulation Element Street Network Changes

- **Connections to Dalidio Drive from Froom Ranch Way and/or Calle Joaquin:** This area is located west of Highway 101, south of the city, and is part of the San Luis Ranch Specific Plan area. This area is primarily in active agricultural production (row crops), with portions of the site consisting of some agricultural development and areas of undisturbed open space and riparian vegetation associated with San Luis Obispo Creek. Including a stand of mature eucalyptus trees associated with the existing farming complex at San Luis Ranch. The development of a connector has the potential to impact areas of common habitat and nesting bird habitat that can occur along the fringe of agricultural areas.

- **North-South Connection between Tank Farm Road and Buckley Road:** Tank Farm and Buckley Roads are parallel streets located at the southern boundary of the city, with the San Luis Obispo Airport and the southern portion of the Chevron Tank Farm located between the two roads. The sites are located adjacent to the Avila Ranch and San Luis Obispo Creek and represent the potential and likely presence of the common habitats discussed above. The potential development of a connector between these two road systems would result in impacts to these common habitats.

- **Buckley Road to Los Osos Valley Road Connections:** This area is located along the southwest portion of the city, neighboring areas of relative open space, including agricultural development and some commercial and residential areas. Portions of this area between Buckley Road and Highway 101 to the west remain relatively undeveloped and have the potential to support common habitats. Areas to the northwest, between Buckley Road and Los Osos Valley Road, contain open areas associated with both San Luis Obispo and Prefumo Creek that could also support this habitat. Development in this area has the potential to result in impacts to common habitats.

The potential impacts to common habitats related to implementation of the above development area projects and street network changes would be considered significant, however, incorporation of the LUCE Update policies and existing City policies discussed below would reduce impacts to less than significant levels.

Proposed Land Use Element Specific Plan Areas

- **San Luis Ranch Specific Plan Area**
  The San Luis Ranch Specific Plan Area consists primarily of non-native agricultural row crops found in the eastern and central portion of the site and a small amount of agricultural support development to the west. Native vegetation that exists on-site is found primarily in the riparian habitat along the banks of Prefumo Creek at the southwest border of the property. Mature non-native eucalyptus trees border the developed area on the west and along Prefumo Creek. Based on the development parameters for the San Luis Ranch Specific Plan area, as outlined in the proposed LUCE Update, development of the site has the potential to result in impacts to disturbed/ruderal
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habitat adjacent to agricultural uses, roadways, and developed areas. However, implementation of the proposed LUCE Update policies, and the existing policies identified below, would reduce future impacts to less than significant levels.

- Madonna on Los Osos Valley Road Specific Plan Area

  The Madonna on Los Osos Valley Road Specific Plan Area is located directly west of the intersection of Los Osos Valley Road and Calle Joaquin and is characterized by low lying relatively flat areas near LOVR, gently climbing to a hillside environment, with some agricultural use and a small amount of support development. Based on the proposed development parameters for the Madonna on Los Osos Valley Road Specific Plan area, as outlined in the proposed LUCE Update, development of the site has the potential to result in impacts to onsite annual grassland and disturbed/ruderal habitats adjacent to open space areas, roadways, and developed areas. Due to the size of this area, and its location adjacent to designated Open Space, impacts to these common habitats are considered potentially significant. However, implementation of the proposed LUCE Update policies, and the existing policies identified below, would reduce future impacts to less than significant levels.

- Avila Ranch Specific Plan Area

  This site encompasses approximately 150 acres and is located on the north side of Buckley Road at the far southern edge of the city. Although primarily used for agriculture, there are some existing buildings along the north and west consisting of service and manufacturing uses. A portion of San Luis Obispo Creek runs diagonally through the middle of the property, influencing onsite biological resources and drainage patterns in low lying areas. Based on the known development parameters for the Avila Ranch Specific Plan area, as outlined in the proposed LUCE Update, development of the site has the potential to result in impacts to disturbed/ruderal habitat adjacent to roadways and developed areas. Impacts to this common habitat type are considered potentially significant. However, implementation of the proposed LUCE Update policies, and the existing policies identified below, would reduce future impacts to less than significant levels.

- South Broad Street Special Planning Area

  The South Broad Street Area encompasses approximately 86 acres and is bounded by Broad Street on the west, the Union Pacific Railroad on the east, High Street to the north, and Orcutt Road to the south. This area is characterized as part of the urban core of the city and is a primarily developed environment.

  Implementation of the proposed LUCE Update policies, and the existing City policies identified below, would reduce impacts to common habitats within the LUCE SOI Planning Subarea to less than significant levels.

Applicable LUCE Update Policies

The General Plan Land Use Element Update draft includes edits to existing policies and programs for protect common natural habitats (policy language edited as part of the LUCE Update is shown using “strikeout and underline” format), while some existing language was retained after critical review:

2.2.7 Natural Features. The City shall require residential developments should to preserve and incorporate as amenities natural site features, such as land forms, views, creeks, wetlands, wildlife habitats, wildlife corridors, and plants.

6.0.1 Resource Planning. It is the policy of the City to shall protect its unique natural resources and systems by including their considerations and needs within its planning program, and giving those considerations and needs a planning priority co-equal with that accorded other community needs. Under this policy, the City will make provisions for the continued existence of its natural resources within the community. The term “community” thus includes not only the urbanized human community, dominated by urban land development and technological systems, but also a natural community rich in biological and geological diversity, as well as a pre-urban human community with a strong agricultural base.

6.0.2 Resource Mapping. The City shall prepare and maintain geographic information systems-based maps of the City, the urban reserve, and the planning area to guide in land use designations and decision-making. Maps for
the city and urban reserve shall be in sufficient detail to highlight all significant natural resources and systems. Maps for the planning area may be at a lesser degree of detail.

The maps shall show at least the following resources: native plant communities, wildlife habitats and corridors, aquatic ecosystems, productive or potentially productive soils (prime or other unique agricultural soil types), viewsheds, terrain, hillsides, greenbelt areas. The overlay maps shall also show development constraints such as flood hazard areas, geological hazard areas, soil hazard areas (subsidence, liquefaction), noise impact areas, airport hazard and noise areas, radiation hazard areas.

The maps shall provide the basis of determining where urban development is most appropriate, and where other needs of the community outweigh the desire or need for urban development. As a result of the findings of these maps, the City shall re-evaluate its land use designations and future plans for undeveloped areas, and revise the LUE land use map accordingly.

6.0.3 Resource Protection

One resource areas worthy of protection are identified, the City shall seek to protect resource areas deemed worthy of permanent protection by fee acquisition, them by easement, or other permanent means.

6.1.1 Open Space and Greenbelt Designations. The City shall designate the following types of land as open space:

A. Upland and valley sensitive habitats or unique resources, as defined in the Conservation and Open Space Element, including corridors which connect habitats.

B. Undeveloped prime agricultural soils which are to remain in agricultural use as provided in policy 1.8.2.

C. Those areas which are best suited to non-urban uses due to: infeasibility of providing proper access or utilities; excessive slope or slope instability; wildland fire hazard; noise exposure; flood hazard; scenic value; wildlife habitat value, including sensitive habitats or unique resources as defined in the Conservation and Open Space Element; agricultural value; and value for passive recreation.

D. A greenbelt, outside the urban reserve, that surrounds the ultimate boundaries of the urban area, and which should connect with wildlife corridors that cross the urbanized area.

E. Sufficient area of each habitat type to ensure the ecological integrity of that habitat type within the urban reserve and the greenbelt, including connections between habitats for wildlife movement and dispersal; these habitat types will be as identified in the natural resource inventory, as discussed in the "Background to this Land Use Element Update" and in Community Goal #8.

Public lands suited for active recreation will be designated Park on the General Plan Land Use Element Map. The City may establish an agricultural designation. (See the Conservation and Open Space Element for refinements of these policies.)

6.1.2 Open Space Uses. Lands designated Open Space should be used for purposes which do not need urban services, major structures, or extensive landform changes. Such uses include: watershed protection; wildlife and native plant habitat; grazing; cultivated crops; and passive recreation. The City shall require that buildings, lighting, paving, use of vehicles, and alterations to the landforms and native or traditional cultural landscapes on open space lands should be are minimized, so rural character and resources are maintained. Buildings and paved surfaces, such as parking or roads, shall not exceed the following: where a parcel smaller than ten acres already exists, five percent of the site area; on a parcel of ten acres or more, three percent. (As explained in the Conservation and Open Space Element, the characteristics of an open space area may result in it being suitable for some open space uses, but not the full range.) Parcels within Open Space areas should not be further subdivided.

6.2.2 Development Limits. The City shall establish and maintain clear development limit lines for hillsides planning areas which have carefully chosen development limit lines, and special design standards for the hillside areas which can be developed. The location of the development limit and the standards should cause development to avoid encroachment into sensitive habitats or unique resources as defined in the Conservation and Open Space Element, and public health and safety problems related to utility service, access, wildland fire
hazard, erosion, flooding, and landslides and other geologic hazards. Also, the development limit line and the
standards should help protect the City’s scenic setting. (Locations of hillside planning areas are shown in
Figure 6. More precise locations of the development limit line and the urban reserve line are shown on large-
scale aerial photographs on file at the Community Development Department; these are part of the Land Use
Element.)

12.3.11 Environmental Review. The purpose of the City’s Environmental Review process is to develop and
maintain a high quality environment now and in the future. Some projects may be exempted from
environmental review by state law or city procedures. For those projects subject to environmental review,
features to be examined would include but not be limited to, toxic contamination, air quality, open space
preservation, sustainability impacts, scenic values and impacts, airport operations, ground slopes, seismic
hazards, soil and groundwater characteristics, wildlife habitats, road and rail traffic noise, water and sewer
service limits, access and circulation, and historic and archaeological resources. is a formal way to inform the
public and decision-makers of the expected consequences of their actions. Two common types of environmental
documents are environmental impacts reports and “initial studies.” Before When considering private proposals
for a major development, such as a specific plan or special-design area, the City should must conduct an
evaluation of environmental opportunities and constraints, to which a private proposal can respond. The City is
committed to early and meaningful participation by the community in the environmental review process to help
inform the public and decision-makers of the potential environmental consequences of their actions. Features to
be examined would include toxic contamination, airport operations, ground slopes, seismic hazards, soil and
groundwater characteristics, significant wildlife habitats, road and rail traffic noise, water and sewer service
limits, access and circulation, and historic and archaeological resources.

Applicable Existing City Policies

The existing General Plan Conservation and Open Space Element (2006) lists goals, policies and programs aimed to protect
common habitats including:

**Goal 7.2. Sustainable natural populations.** The City will maintain and enhance conditions necessary to enable a
species to become self-sustaining. Within the San Luis Obispo LUCE SOI Planning Subarea, the City will seek to
achieve self-sustaining populations of the plants, fish and wildlife that made up the natural communities in the
area when urbanization began.

**Goal 7.4: Trees and other plants.** Protect, preserve and create the conditions that will promote the preservation
of significant trees and other vegetation, particularly native California species.

**Policies**

7.3.1 Protect listed species.

A. The City will identify the location, habitat and buffer needs of species listed for protection. This
information will be developed by qualified people early in the planning and development review process.

B. The City will establish and maintain records on the location of listed species. The City will maintain, for
public use, generalized maps showing known locations of listed species. Specific site information may be
kept confidential to protect the resources.

C. The City will comply with State and Federal requirements for listed species.

D. The City will protect listed species through its actions on: land-use designations; development standards;
development applications; location, design, construction and maintenance of creeks, City roads and
facilities; and on land that the City owns or manages.

7.3.2 Species of local concern.

The City will:
A. Maintain healthy populations of native species in the long term, even though they are not listed for protection under State or Federal laws. These “species of local concern” are at the limit of their range in San Luis Obispo, or threats to their habitat are increasing.

B. Identify the location, habitat and buffer needs of species of local concern. This information will be developed by qualified people early in the planning and development review process.

C. Protect species of local concern through: its actions on land use designations, development standards, development applications; the location, design, construction and maintenance of City facilities; land that the City owns or manages.

D. Encourage individuals, organizations and other agencies to protect species of local concern within their areas of responsibility and jurisdiction.

E. Protect sensitive habitat, including creeks, from encroachment by livestock and human activities.

7.3.3 Wildlife habitat and corridors. Continuous wildlife habitat, including corridors free of human disruption, shall be preserved and where necessary, created by interconnecting open spaces, wildlife habitat and corridors.

7.5.4 Preservation of grassland communities and other habitat types. Grassland communities and other habitat types in the Greenbelt and in designated open space areas shall be preserved.

7.7.1 Protect natural communities. The City will do the following in support of natural communities and will encourage individuals, organizations, and other agencies to take the same actions within their areas of responsibility and jurisdiction:

7.7.2 Implement the Natural Communities policies above.

7.7.3 Participate in any area-wide planning efforts such as Habitat Conservation Plans under the U.S. Endangered Species Act.

7.7.4 Participate in environmental review conducted by other agencies for projects that could affect natural communities in the San Luis Obispo Planning Area.

Within the urban area, the City will secure and maintain a diverse network of open land encompassing particularly valuable natural and agricultural resources, connected with the landscape around the urban area. Particularly valuable resources are:

A. Creek corridors, including open channels with natural banks and vegetation.

B. Laguna Lake and its undeveloped margins.

C. Wetlands and vernal pools.

D. Undeveloped land within the Urban Reserve not intended for urban uses.

E. Grassland communities and woodlands.

F. Wildlife habitat and corridors for the health and mobility of individuals and of the species.

G. The habitat of species listed as threatened or endangered by the State or Federal governments.

M. Unique plant and animal communities, including “species of local concern.”

8.3.2 Open space buffers. [RELEVANT PORTION] When activities close to open space resources within or outside the urban area could harm them, the City will require buffers between the activities and the resources. The City will actively encourage individuals, organizations and other agencies to follow this policy. Buffers associated with new development shall be on the site of the development, rather than on neighboring land containing the open space resource. Buffers provide distance in the form of setbacks, within which certain features or activities are not allowed or conditionally allowed. Buffers shall also use techniques such as planting and wildlife-compatible fencing. Buffers shall be adequate for the most sensitive species in the protected area, as determined by a qualified professional and shall complement the protected area’s habitat values. Buffers shall be required in the following situations:
A. Between urban development -- including parks and public facilities--and natural habitats such as creeks, wetlands, hillsides and ridgelines, Morros, scenic rock outcrops and other significant geological features, and grassland communities, to address noise, lighting, storm runoff, spread of invasive, non-native species, and access by people and pets (see also the Safety Element for “defensible space” next to wildland fire areas).

C. Between agricultural operations and natural habitat, to address noise, chemical use, sediment transport, and livestock access.

Future development under the LUCE Update will be required to comply with local, State, and Federal laws and policies, and all applicable permitting requirements of the regulatory and oversight agencies intended to address potential impacts to common natural habitats. No additional General Plan policy direction or mitigation measures are required to ensure impacts to common (i.e., ruderal or disturbed) habitats remain less than significant. Individual development will be required to undergo separate environmental review, which may result in specific impacts that require project specific mitigation consistent with these policies.

Mitigation Measures
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. By protecting opens space and defining development limits and through required environmental review, the proposed LUCE Update provides insurances that the natural environment is considered during permit review. In addition, the goals, policies and programs outlined in the Conservation and Open Space Element require that future development consider the survivability of natural communities, trees, open space and grasslands. As such, with incorporation of the LUCE Update and adherence to the existing City policies and state and federal regulatory requirements discussed above, additional mitigation is not required.

Significance After Mitigation
Implementation of proposed and existing local policies, as well as compliance with State and Federal laws and policies and the requirements of regulatory and oversight agencies as appropriate, and reliance on establishment of project-specific mitigation measures where appropriate would reduce potential impacts to a less than significant level.

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.

Development under the LUCE Update has potential to impact four habitat types listed as Natural Communities of Special Concern by the CDFW, Serpentine Bunchgrass, Northern Interior Cypress Stand, Central Maritime Chaparral, and Coastal and Valley Freshwater Marsh, that have high potential to support special-status plant and wildlife species (refer to Table 4.4-2 and Figure 4.2-2). In addition, riparian, vernal pool, oak woodland, and native perennial grassland habitats present within the LUCE SOI Planning Subarea are considered sensitive by the CDFW and other regulatory agencies and could be impacted by future development. Table 4.4-4 provides a summary of natural habitat constraints within this area.

Potential near-term and long-term impacts in these areas are related to loss of habitat and the introduction or increase of human presence. Specific impacts due to development include the disruption of patterns of habitat use, displacement of individuals, disruption of breeding habits, disruption and barriers to wildlife movements, increased mortality of wildlife species and in turn less prey, night lighting, and reduction of available habitat in general. The level of intensity of impacts related to human presence would depend upon the habitat disturbed and level of build out within these developable areas and adjacent habitat areas. The proposed Airport overlay zone and compatibility criteria changes would not, in and
of themselves, result in an environmental impact. However, future development in areas under the overlay zone could result in impacts.

COSE Policy 7.3 requires that projects within or adjacent to known occurrences of Natural Communities of Special Concern, or in areas that have potential to contain one or more of these habitats, would be expected to have a site-specific biology report prepared and undergo individual project environmental review to determine the location, extent, and proposed impact to those habitats. These project-level biological surveys to map Special Concern or sensitive habitat boundaries, and to determine presence/absence of special-status wildlife and plant species would be required prior to any ground disturbing activity. Any impacts to these habitats would require permits and/or authorization from local, state and federal regulatory agencies, including the City of San Luis Obispo, CDFW, RWQCB, USFWS, NMFS, and USACE, and site-specific mitigation would be required to offset impacts associated with project development.

Under the current and proposed policies, and the regulatory framework governing sensitive habitats and associated plant and wildlife species, potential impacts to Special Concern or sensitive habitats within the LUCE SOI Planning Subarea are considered potentially significant but mitigable.

**Proposed LUCE Update Development Proposed and Specific Planning 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 disturbance of Natural Communities of Special Concern, 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 Section 2.0 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 potential adverse effects to Natural Communities of Special Concern.

**Proposed Land Use Element Development Special Planning Areas**

- **General Hospital Site:** This area is located along the eastern boundary of the city, near the intersection of Johnson Avenue and Bishop Street and represents an urban interface with the hillsides and designated Open Space to the east. The area located behind the existing General Hospital is in direct proximity to natural communities and communities of special concern discussed above. This includes, but is not limited to, potential occurrences of native grasslands and oak woodlands. Future development in this area has the potential to result in the disturbance of these Natural Communities of Special Concern;

- **Los Osos Valley Road (LOVR) 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 site is primarily undeveloped and serves as a gateway to designated Open Space to the west. Undisturbed portions of the site likely contain Natural Communities of Special Concern. Future development in this area has the potential to result in the disturbance of these Natural Communities of Special Concern.

**Proposed Circulation Element Street Network Changes**

- **Connections to Dalidio Drive from Froom Ranch Way and/or Calle Joaquin:** This area is located west of Highway 101, south of the city, and is part of the San Luis Ranch Specific Plan area. This area is primarily in active agricultural production (row crops), with portions of the site consisting of some agricultural development and areas of undisturbed open space and riparian vegetation associated with San Luis Obispo Creek. Including a stand of mature eucalyptus trees associated with the existing farming complex at San Luis Ranch and potential Coastal and Valley Freshwater Marsh habitat associated primarily with Prefumo Creek. The development of a connector has the potential to impact areas of Natural Communities of Special Concern that can occur along riparian and
open space areas. Future development in this area has the potential to result in the disturbance of these Natural Communities of Special Concern.

- **North-South Connection between Tank Farm Road and Buckley Road:** Tank Farm and Buckley Roads are parallel streets located at the southern boundary of the city, with the San Luis Obispo Airport and the southern portion of the Chevron Tank Farm located between the two roads. The sites are located adjacent to the Avila Ranch and San Luis Obispo Creek and represent the potential and likely presence of the Natural Communities of Special Concern discussed above. Future development in this area has the potential to result in the disturbance of these Natural Communities of Special Concern.

- **Buckley Road to Los Osos Valley Road Connections:** This area is located along the southwest portion of the city, neighboring areas of relative open space, including agricultural development and some commercial and residential areas. Portions of this area between Buckley Road and Highway 101 to the west remain relatively undeveloped and have the potential to support Natural Communities of Special Concern. Areas to the northwest, between Buckley Road and Los Osos Valley Road, contain open areas associated with both San Luis Obispo and Prefumo Creek that could also support this habitat. Development in this area has the potential to result in impacts to these Natural Communities of Special Concern.

The potential impacts to Natural Communities of Special Concern related to implementation of the above development area projects and street network changes would be considered significant, however, incorporation of the LUCE Update policies and existing City policies discussed below would reduce impacts to less than significant levels.

**Proposed Land Use Element Specific Plan Areas**

- **San Luis Ranch Specific Plan Area**
  The San Luis Ranch Specific Plan Area consists primarily of agricultural row crops and a small amount of agricultural support development to the west. Native vegetation that exists on-site is found primarily in the riparian habitat along the banks of Prefumo Creek at the southwest border of the property. Mature non-native eucalyptus trees border the developed area on the west and along Prefumo Creek. Based on the proposed development parameters for the San Luis Ranch Specific Plan area, and onsite resources including habitat associated with San Luis Obispo and Prefumo Creeks, development of the site has the potential to result in impacts to Coastal and Valley Freshwater Marsh habitat associated in particular with Prefumo Creek. No other sensitive habitats are known to occur in this Specific Plan area. Impacts to Coastal and Valley Freshwater Marsh habitat in this area are considered less than significant with incorporation of the proposed LUCE Update, and adherence to the existing City policies and state and federal regulatory requirements discussed above.

- **Madonna on Los Osos Valley Road Specific Plan Area**
  Based on the proposed development parameters for the Madonna on Los Osos Valley Road Specific Plan and onsite resources including low lying areas subject to flooding near Los Osos valley Road, development of the site has the potential to result in impacts to Coastal and Valley Freshwater Marsh habitat. No other sensitive habitats are known to occur in this Specific Plan area. Impacts to Coastal and Valley Freshwater Marsh habitat in this area are considered less than significant with incorporation of the proposed LUCE Update, and adherence to the existing City policies and state and federal regulatory requirements discussed above.

- **Avila Ranch Specific Plan Area**
  The proposed development parameters for the Avila Ranch Specific Plan area have been generally outlined through the LUCE Update. This site is characterized by primarily agricultural development and open space associated with San Luis Obispo Creek which flows diagonally through the property from the northeast to the southwest, with some service and manufacturing uses included on a small portion of the site. Development of the site has the potential to result in impacts to Coastal and Valley Freshwater Marsh habitat associated with San Luis Obispo Creek. No other sensitive habitats are known to occur in this Specific Plan area. Impacts are considered less than significant with incorporation of the proposed LUCE Update policies, and adherence to the existing City policies and state and federal regulatory requirements discussed above.
South Broad Street Special Planning Area

Based on the potential development parameters for the South Broad Street Special Planning Area, development of the site has the potential to result in impacts to Coastal and Valley Freshwater Marsh habitat associated with the nearby Acacia Creek. No other sensitive habitats are known to occur in this special planning area. Impacts to Coastal and Valley Freshwater Marsh habitat in this area are considered less than significant with incorporation of the proposed LUCE Update policies, and adherence to the existing City policies and state and federal regulatory requirements discussed above.

The potential impacts to common habitats related to implementation of the above development area projects and street network changes would be considered significant; however, implementation of COSE policies that require biological analysis (COSE 7.3.1A), compliance with state and federal requirements for listed species (COSE 7.3.1C) and protection of natural communities (COSE 7.7) and existing City policies discussed below would reduce future project impacts to a less than significant level.

Applicable LUCE Update Policies
The proposed LUCE Update includes goals, policies and programs intended to minimize and mitigate for potential impacts to sensitive natural habitats. This includes the following goals and policies discussed under Impact BIO-1, above:

- 2.2.7 Natural Features;
- 6.0.1 Resource Planning;
- 6.0.2 Resource Mapping;
- 6.0.3 Resource Protection;
- 8.3.2 Open space buffers; and
- 12.3.11 Environmental Review.

In addition to these policies and programs, the following LUCE Update policies and programs (policy language edited as part of the LUCE Update is shown using “strikeout and underline” format) address impacts related to Natural Communities of Special Concern and will further reduce impacts to less than significant levels:

1.7.7 Trees Outside City Limits. The City shall preserve significant trees, particularly native species, outside its limits and in the greenbelt shall be protected on lands owned or leased by the City or for which the City has an easement. For other areas in the greenbelt, the City will work with the County, Cal Poly, and other public agencies to protect these trees.

4.0.10 The San Luis Obispo Creek. The City shall protect San Luis Obispo Creek should be protected and restored it, provided this can be done in a manner that minimizes human impact on creek life. Walking paths along the creek in the downtown core should be provided and extended as links in an urban trail system, provided this will not further degrade wildlife habitat value of the riparian ecosystem. As properties that have encroaching buildings are redeveloped, the City should enforce a reasonable building setback from the riparian zone. (See also Resource Protection Sections in the Conservation and Open Space Element and Safety Element) Opportunities to open covered sections of the creek should be pursued.

6.4 Creeks Wetlands, and Flooding Policies. San Luis Obispo’s aquatic ecosystems consist of creeks, Laguna Lake, floodplains, marshes, wetlands, serpentine seeps, and springs. These aquatic ecosystems provide habitat, recreation, water purification, groundwater recharge, and soil production as well as natural flood protection by reducing the force of floodwaters as they spread and decelerate over floodplains. Creeks, which are the most obvious of these systems because they flow under and through the City, provide wildlife habitat, backyard retreats, and viewing and hiking pleasures, in addition to carrying storm water runoff. When some creeks overflow during major storms, they flood wide areas beyond their channel. San Luis Obispo wants to avoid injury or substantial property losses from flooding, while keeping or improving the creeks’ natural character, scenic appearance, recreational value, and fish and wildlife habitat.

6.4.1 Creek and Wetlands Management Objectives. The City shall manage its lake, creeks, wetlands, floodplains, and associated wetlands to achieve the multiple objectives of:
4.0 Environmental Impact Analysis

A. Maintaining and restoring natural conditions and fish and wildlife habitat;
B. Preventing loss of life and minimizing property damage from flooding;
C. Providing recreational opportunities which are compatible with fish and wildlife habitat, flood protection, and use of adjacent private properties;
D. Recognizing and distinguishing between those sections of creeks and Laguna Lake which are in previously urbanized areas, such as the Downtown core, and sections which are in largely natural areas. Those sections already heavily impacted by urban development and activity may be appropriate for multiple use whereas creeks and lakeshore in a more natural state shall be managed for maximized ecological value.

6.4.2 Citywide Network. The City shall include the lake, creeks, and wetlands as part of a citywide and regional network of open space, parks, and -- where appropriate -- trails, all fostering understanding, enjoyment, and protection of the natural landscape and wildlife.

Applicable Existing City Policies
The existing General Plan Conservation and Open Space Element (2006) includes policies intended to minimize and mitigate for potential impacts to sensitive natural habitats. The following goals, policies and programs, discussed under Impact BIO-1, will reduce impacts related to Natural Communities of Special Concern:

- Goal 7.2 Sustainable natural populations;
- Goal 7.4 Trees and other plants;
- 7.2.1 Protect Listed Species;
- 7.3.3 Wildlife habitat and corridors; and
- 7.7.1 Protect natural communities.

In addition, the following Conservation and Open Space goals, programs and policies address impacts related to Natural Communities of Special Concern:

Policy 7.7.5 Develop and maintain current benchmark information on habitat types and conditions. For listed species, species of local concern and California Native Plant Society listed species (now also referred to as California Rare Plant Rank species), develop and maintain benchmark information on the known and likely locations of populations, population number and density estimates, limiting factors, environmental threats and other pertinent information for use in planning and environmental review.

Policy 7.7.9 Creek Setbacks. As further described in the Zoning Regulations, the City will maintain creek setbacks to include an appropriate separation from the physical top of bank; the appropriate floodway as identified in the Flood Management Policy; and native riparian plants or wildlife habitat and space for paths called for by any City-adopted plan (Figure 4 of the COSE). In addition, creek setbacks should be consistent with the following:

A. The following items should be no closer to the wetland or creek than the setback line: buildings, streets, driveways, parking lots, above-ground utilities, and outdoor commercial storage or work areas.
B. Development approvals should respect the separation from creek banks and protection of floodways and natural features identified in part A above, whether or not the setback line has been established.
C. Features which normally would be outside the creek setback may be permitted to encroach where there is no practical alternative, to allow reasonable development of a parcel, consistent with the Conservation and Open Space Element.
D. Existing bridges may be replaced or widened, consistent with policies in this Element. Removal of any existing bridge or restoration of a channel to more natural conditions will provide for wildlife corridors, traffic circulation, access, utilities, and reasonable use of adjacent properties.

Policy 8.6.3 Required mitigation. Loss or harm shall be mitigated to the maximum extent feasible. Mitigation must at least comply with Federal and State requirements. Mitigation shall be implemented and monitored in
compliance with State and Federal requirements, by qualified professionals, and shall be funded by the project applicant.

A. For natural habitat that is relatively limited in extent (such as riparian or wetland habitat) mitigation shall consist of creating twice the area of habitat lost, of equal quality, in the following order of preference:
   
   1. The same kind on the same site.
   
   2. The same kind on a different site (the site shall be within the San Luis Obispo LUCE SOI Planning Subarea).
   
   3. A similar kind (such as seasonal wetland in place of freshwater marsh) on the same site.
   
   4. A similar kind on a different site (the site shall be within the San Luis Obispo LUCE SOI Planning Subarea).

B. Habitat created as mitigation should be located and designed to minimize the need for long-term artificial support (such as supplying wetlands from a well requiring energy and maintenance).

C. For a widespread habitat type or for farmland, mitigation shall consist of permanently protecting an equal area of equal quality, which does not already have permanent protection, within the San Luis Obispo LUCE SOI Planning Subarea.

D. For projects involving enlargement of the urban reserve, mitigation shall consist of permanently protecting an area not previously protected, that is located and that has sufficient size (generally four times the area to be developed) to secure a permanent edge to the city.

E. Individual small projects, each with an incremental impact on an extensive resource, may provide mitigation through payment of a fee, to be used for protecting that resource within the San Luis Obispo LUCE SOI Planning Subarea.

F. The City may establish or participate in a “mitigation bank,” through which resources are protected in a consolidated location ahead of the need to mitigate impacts of individual, small projects. The City will work with other agencies to assure successful operation of any mitigation bank that is established.

G. Any development that is allowed on a site designated as Open Space or Agriculture, or containing open-space resources, shall be designed to minimize its impacts on open space values on the site and on neighboring land.

   1. Hillside development shall comply with the standards of the Land Use Element, including minimization of grading for structures and access, and use of building forms, colors, and landscaping that are not visually intrusive. (See also Chapter 9.21.1)

   2. Creek corridors, wetlands, grassland communities, other valuable habitat areas, archaeological resources, agricultural land, and necessary buffers should be within their own parcel, rather than divided among newly created parcels (Figure 8 of the COSE). Where creation of a separate parcel is not practical, the resources shall be within an easement. The easement must clearly establish allowed uses and maintenance responsibilities in furtherance of resource protection.

   3. The City will encourage the County not to create new parcels within the greenbelt, with the exception of those permitted under the County’s agriculture cluster incentive. Outside of cluster districts, allowed parcel sizes within the greenbelt should be no smaller, and the number of dwellings allowed on a parcel should be no greater than as designated in the September 2002 San Luis Obispo Area Plan and related County codes. The City will encourage the County to adopt and implement a mandatory cluster district for appropriate areas of the Greenbelt under County jurisdiction to preserve open space qualities, consistent with this Element. The City will encourage other agencies to follow these policies.

Future development the LUCE Update will be required to comply with local, State, and Federal laws and policies, and all applicable permitting requirements of the regulatory and oversight agencies intended to address potential impacts to
natural communities of special concern. No additional General Plan policy direction or mitigation measures are required to ensure impacts to Serpentine Bunchgrass, Northern Interior Cypress Stand, Central Maritime Chaparral, and Coastal and Valley Freshwater Marsh habitats are less than significant. Individual development will be required to undergo separate environmental review, which may result in specific impacts that require project specific mitigation consistent with these policies.

**Mitigation Measures**

Development under 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 (refer to Figure 4.4-2). However, with incorporation of the LUCE Update, and adherence to the existing City policies and state and federal regulatory requirements discussed above, impacts are reduced to less than significant levels through goals, policies and programs that require either the protection and avoidance of protected resources prior to proposed development, or though the required mitigation of impacts to protected resources. With the incorporation of these City requirements, and the requirements of State and Federal agencies, additional mitigation is not required.

**Significance After Mitigation**

Implementation of proposed and existing local policies, as well as compliance with State and Federal laws and policies and the requirements of regulatory and oversight agencies as appropriate, and reliance on establishment of project-specific mitigation measures where appropriate would reduce potential impacts to a less than significant level.

<table>
<thead>
<tr>
<th>Impact BIO-3</th>
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<tbody>
<tr>
<td>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.</td>
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Development under the LUCE Update has potential to impact special-status plant species (as defined in Section 4.4.1b) present within the LUCE SOI Planning Subarea (refer to Table 4.4.1, and Figure 4.4-2). Although the majority of special-status plant species occurrences are located outside the city limits, development within any natural habitat type within the city limits could have potential to impact special-status plant species. The proposed Airport overlay zone and compatibility criteria changes would not, in and of themselves, result in an environmental impact.

As noted in this section, projects within or adjacent to known occurrences of the listed species, or habitat types that have potential to contain special-status plant species, will undergo individual project environmental review to ensure protection of special-status plant species populations. Focused biological surveys to determine presence/absence and map locations of special-status plant species occurrences would be required prior to any ground disturbing activity. Impacts to special-status plant species may require consultation with the CDFW and USFWS, and mitigation would be required per city policy and state and federal regulations to offset any impacts associated with individual project development.

**Proposed LUCE Update Development Special Planning 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 disturbance of special-status plant species, 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 potential adverse effects to special-status plant species.

Proposed Land Use Element Development Special Planning Areas

- **General Hospital Site:** This area is located along the eastern boundary of the city, near the intersection of Johnson Avenue and Bishop Street and represents an urban interface with the hillsides and designated Open Space to the east. The area located behind the existing General Hospital is in direct proximity to natural communities and have the potential to support special-status plant species. This includes, but is not limited to, potential occurrences of special-status plants associated with native grasslands and oak woodlands. Future development in this area has the potential to result in the disturbance of special status plants;

- **Los Osos Valley Road (LOVR) 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 site is primarily undeveloped and serves as a gateway to designated Open Space to the west. Undisturbed portions of the site have the potential to support special-status plant species. Future development of this area has the potential to result in impacts to these resources;

Proposed Circulation Element Street Network Changes

- **Connections to Dalidio Drive from Froom Ranch Way and/or Calle Joaquin:** This area is located west of Highway 101, south of the city, and is adjacent to the San Luis Ranch Specific Plan area. This area is primarily in active agricultural production (row crops), with portions of the site consisting of some agricultural development and areas of undisturbed open space and riparian vegetation associated with San Luis Obispo Creek. Including a stand of mature eucalyptus trees associated with the existing farming complex at San Luis Ranch and potential Coastal and Valley Freshwater Marsh habitat associated primarily with Prefumo Creek. This area has the potential to exhibit habitat that could support special-status plant species. The development of a connector could impact special-status plant species that can occur along riparian and open space areas.

- **North-South Connection between Tank Farm Road and Buckley Road:** Tank Farm and Buckley Roads are parallel streets located at the southern boundary of the city, with the San Luis Obispo Airport and the southern portion of the Chevron Tank Farm located between the two roads. The sites are located adjacent to the Avila Ranch and San Luis Obispo Creek and are relatively void of dense structural development, representing the potential for the presence of special-status plants. The potential development of a connector between these two road systems could potentially impact special-status plant species;

- **Buckley Road to Los Osos Valley Road Connections:** This area is located along the southwest portion of the city, neighboring areas of relative open space, including agricultural development and some commercial and residential areas. Portions of this area between Buckley Road and Highway 101 to the west remain relatively undeveloped and have the potential to support habitat for special-status plant species. Areas to the northwest, between Buckley Road and Los Osos Valley Road, contain open areas associated with both San Luis and Prefumo Creeks that could also support this habitat. Development in this area has the potential to result in impacts to special-status plant species.

The potential impacts to special-status plant species related to implementation of the above development area projects and street network changes would be considered significant; however, incorporation of the LUCE Update policies and existing City policies discussed below would reduce impacts to less than significant levels.
Proposed Land Use Element Specific Plan Areas

- San Luis Ranch Specific Plan Area

  The 131-acre San Luis Ranch Specific Plan Area is vegetated primarily by non-native agricultural row crops found in the eastern and central portion of the site and a small amount of agricultural support development. Native vegetation that exists on-site is found primarily in the riparian habitat along the banks of Prefumo Creek at the southwest border of the property. Mature non-native eucalyptus trees border the developed area on the west and along Prefumo Creek. Based on the proposed development parameters for the San Luis Ranch Specific Plan Area, development of the site has the potential to result in impacts to the special-status plant species associated with Prefumo Creek. As shown on Figure 4.4-2, several special-status species occurrences are mapped on or near the site by the CNDDB. Impacts to special-status plant species in this area are considered less than significant with incorporation of the proposed LUCE Update, and adherence to the existing City policies and state and federal regulatory requirements discussed above.

- Madonna on Los Osos Valley Road Specific Plan Area

  The Madonna on Los Osos Valley Road Specific Plan Area is characterized by low lying relatively flat areas subject to flooding in storm events near LOVR, gently climbing to a hillside environment, with some agricultural use and a small amount of support development. Based on the proposed development parameters outlined in the proposed LUCE Update, development of the site has the potential to result in impacts to special-status plant species associated with the annual grasslands and wetland habitats in the flat low lying areas of the site. As shown on Figure 4.4-2, several special-status species occurrences are mapped on or near the site by the CNDDB. Impacts to special-status plant species in this area are considered less than significant with incorporation of the proposed LUCE Update, and adherence to the existing City policies and state and federal regulatory requirements discussed above.

- Avila Ranch Specific Plan Area

  This site is characterized by primarily agricultural development and open space associated with San Luis Obispo Creek which flows diagonally through the property from the northeast to the southwest, with some service and manufacturing uses included on a small portion of the site. Based on the proposed development parameters for the Avila Ranch Specific Plan area outlined in the LUCE Update, development of the site has the potential to result in impacts to special-status plant species associated with San Luis Obispo Creek and associated riparian habitats. As shown on Figure 4.4-2, several special-status species occurrences are mapped on or near the site by the CNDDB. Impacts to special-status plant species in this area are considered less than significant with incorporation of the proposed LUCE Update, and adherence to the existing City policies and state and federal regulatory requirements discussed above.

- South Broad Street Special Planning Area

  Although this site is characterized as a primarily developed portion of the city urban core, development of the site has the potential to result in impacts to special-status plants associated with the nearby Acacia Creek. As shown on Figure 4.4-2, several special-status species occurrences are mapped near the site by the CNDDB. Impacts to special-status plant species in this area are considered less than significant with incorporation of the LUCE Update, and adherence to the existing City policies and state and federal regulatory requirements discussed above.

Applicable LUCE Update Policies

The LUCE Update includes policies and programs intended to minimize and mitigate for potential impacts to special-status plan species. The following LUCE Update policies and programs, discussed in detail under Impact BIO-1 will reduce impacts to special-status plant species:

- 2.2.7 Natural Features,
- 6.0.1 Resource Planning,
6.0.2 Resource Mapping,
6.0.3 Resource Protection, and
12.3.11 Environmental Review.

Applicable Existing City Policies
The existing General Plan Conservation and Open Space Element (2006) includes goals, policies and programs intended to minimize and mitigate for potential impacts to special-status plant species. The following goals, policies and programs, as well as those shown in Impacts BIO-1 and Bio-2, will reduce the impact of future development on special-status plant species:

- Goal 7.2. Sustainable natural populations;
- 7.3.1 Protect listed species;
- 7.3.2 Species of local concern;
- 7.3.3 Wildlife habitat and corridors;
- 7.7.1 Protect natural communities;
- 7.7.5 Develop and maintain current benchmark information on habitat types and conditions;
- 7.7.9 Creek Setbacks; and
- 8.6.3 Required mitigation.

Future development under the LUCE Update will be required to comply with local, State, and Federal laws and policies, and all applicable permitting requirements of the regulatory and oversight agencies intended to address potential impacts to special-status plant species. No additional policy direction is required to ensure impacts remain less than significant. Individual development will be required to undergo separate environmental review, which may result in specific impacts that require project specific mitigation consistent with these policies.

Mitigation Measures
Development under the LUCE Update has potential to impact special-status plant species within the LUCE SOI Planning Subarea. However, with incorporation of the proposed LUCE Update, and adherence to the existing City policies and state and federal regulatory requirements discussed above, impacts would be addressed through either avoidance of the resource based on detailed site-specific biological studies, or through the detailed mitigation requirements for the protection of plant species that occur on a given site. Additional mitigation is not required.

Significance After Mitigation.
Implementation of proposed and existing local policies, as well as compliance with State and Federal laws and policies and the requirements of regulatory and oversight agencies as appropriate, and reliance on establishment of project-specific mitigation measures where appropriate would reduce potential impacts to a less than significant level.

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.

Future development consistent with the General Plan has the potential to impact special-status wildlife species (as defined in Section 4.4.1b) present within the LUCE SOI Planning Subarea (refer to Table 4.4.2, and Figure 4.4-3). While the majority of special-status wildlife species occurrences are located outside the city limits, development within grasslands, wetland, riparian, and forest/grove habitats within the city limits would have potential to impact special-status wildlife. Projects within or adjacent to known occurrences of listed species, or habitat types that have potential to contain one or more special-status wildlife species, would undergo individual project environmental review to ensure protection of those species. The existing General Plan requires focused biological surveys to determine presence/absence and map locations of special-status wildlife species occurrences prior to any habitat disturbance. Impacts to special-status wildlife species
may require consultation with the CDFW, USFWS, and NOAA Fisheries, and mitigation would be required to offset specific project impacts. The proposed Airport overlay zone and compatibility criteria changes would not, in and of themselves, result in an environmental impact. However, future development in areas under the overlay zone could result in impacts.

Implementation of proposed and existing local policies, as well as compliance with State and Federal laws and policies and the requirements of regulatory and oversight agencies as appropriate, and reliance on establishment of project-specific mitigation measures where appropriate would reduce potential impacts to a less than significant level.

**Proposed LUCE Update Development Proposed and Specific Planning 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 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 disturbance of special-status wildlife species, it is important to note that these projects have not been fully developed through the advanced planning process. 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 Section 2.0 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 potential adverse effects to special-status wildlife species.

**Proposed Land Use Element Development Special Planning Areas**

- **General Hospital Site:** This area is located along the eastern boundary of the city, near the intersection of Johnson Avenue and Bishop Street and represents an urban interface with the hillsides and designated Open Space to the east. The area located behind the existing General Hospital is in direct proximity to natural communities and have the potential to support special-status wildlife species. This includes, but is not limited to, potential occurrences of special-status wildlife associated with native grasslands and oak woodlands. Future development in this area has the potential to result in the disturbance of special-status wildlife;

- **Los Osos Valley Road (LOVR) 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 site is primarily undeveloped and serves as a gateway to designated Open Space to the west. Undisturbed portions of the site have the potential to support special-status wildlife species. Especially within areas supporting wetland and riparian habitat, which provide foraging and denning/roosting habitat for wildlife. Future development of this area has the potential to result in impacts to these resources.

**Proposed Circulation Element Street Network Changes**

- **Connections to Dalidio Drive from Froom Ranch Way and/or Calle Joaquin:** This area is located west of Highway 101, south of the city, and is adjacent to the San Luis Ranch Specific Plan area. This area is primarily in active agricultural production (row crops), with portions of the site consisting of some agricultural development and areas of undisturbed open space and riparian vegetation associated with San Luis Obispo Creek. Including a stand of mature eucalyptus trees associated with the existing farming complex at San Luis Ranch and potential Coastal and Valley Freshwater Marsh habitat associated primarily with Prefumo Creek. This area has the potential to exhibit denning, roosting and/or foraging habitat that could support special-status wildlife species. The development of a connector could impact special-status wildlife that can occur along riparian and open space areas.

- **North-South Connection between Tank Farm Road. and Buckley Road:** Tank Farm and Buckley Roads are parallel streets located at the southern boundary of the city, with the San Luis Obispo Airport and the southern portion of the Chevron Tank Farm located between the two roads. The sites are located adjacent to the Avila Ranch and San Luis Obispo Creek and are relatively void of dense structural development, representing undeveloped open space with the potential for the presence of special-status wildlife. The potential development of a connector between these two road systems could potentially impact special-status wildlife species utilizing the foraging habitat migration corridor associated with the creek and nearby wetland habitat on the Tank Farm site;
Buckley Road to Los Osos Valley Road Connections: This area is located along the southwest portion of the city, neighboring areas of relative open space, including agricultural development and some commercial and residential areas. Portions of this area between Buckley Road and Highway 101 to the west remain relatively undeveloped and have the potential to support habitat for special-status plant species. Areas to the northwest, between Buckley Road and Los Osos Valley Road, contain open areas associated with both San Luis and Prefumo Creeks that could also support this habitat. Development in this area has the potential to result in impacts to special-status plant species.

The potential impacts to special-status wildlife species related to implementation of the above development area projects and street network changes would be considered significant; however, incorporation of the LUCE Update policies and existing City policies discussed below would reduce impacts to less than significant levels.

Proposed Land Use Element Specific Plan Areas

San Luis Ranch Specific Plan Area

The San Luis Ranch Specific Plan Area consists primarily of non-native agricultural row crops found in the eastern and central portion of the site and a small amount of agricultural support development to the west. Native vegetation that exists on-site is found primarily in the riparian habitat along the banks of Prefumo Creek at the southwest border of the property. Mature non-native eucalyptus trees border the developed area on the west and along Prefumo Creek. Based on the proposed development parameters for the San Luis Ranch Specific Plan area, development of the site has the potential to result in impacts to special-status wildlife species associated with Prefumo Creek and with Eucalyptus groves. As shown on Figure 4.4-3, occurrences of several special-status wildlife species are mapped on or near the site by the CNDDB. Impacts to special-status wildlife species in this area are considered less than significant with incorporation of the proposed LUCE Update, and adherence to the existing City policies and state and federal regulatory requirements discussed below.

Madonna on Los Osos Valley Road Specific Plan Area

The Madonna on Los Osos Valley Road Specific Plan Area is characterized by low lying relatively flat areas subject to flooding in storm events near LOVR, gently climbing to a hillside environment, with some agricultural use and a small amount of support development. Based on the proposed development parameters for the site, as outlined in the proposed LUCE Update, development has the potential to result in impacts to special-status wildlife species associated with wetland, riparian, and annual grassland habitats. Figure 4.4-3 does not map any occurrences of special-status wildlife species on the site. Impacts to special-status wildlife species in this area are considered less than significant with incorporation of the proposed LUCE Update, and adherence to the existing City policies and state and federal regulatory requirements discussed below.

Avila Ranch Specific Plan Area

This site is characterized by primarily agricultural development and open space associated with San Luis Obispo Creek which flows diagonally through the property from the northeast to the southwest, with some service and manufacturing uses included on a small portion of the site. Based on the proposed development parameters for the site, development has the potential to result in impacts to special-status wildlife species associated with San Luis Obispo Creek and associated riparian habitats. As shown on Figure 4.4-3, occurrences of several special-status wildlife species are mapped on or near the site by the CNDDB. Impacts to special-status wildlife species in this area are considered less than significant with incorporation of the proposed LUCE Update, and adherence to the existing City policies and state and federal regulatory requirements discussed below.

South Broad Street Special Planning Area

The South Broad Street Special Planning Area is characterized as a primarily built environment, associated with the urban core of the city. Based on the proposed development parameters for the South Broad Street Special Planning Area, development has the potential to result in impacts to special-status wildlife species associated with the nearby Acacia Creek. As shown on Figure 4.4-3, occurrences of several special-status wildlife species are mapped on or near the site by the CNDDB. Impacts to special-status wildlife species in this area are considered
less than significant with incorporation of the proposed LUCE Update, and adherence to the existing City policies and state and federal regulatory requirements discussed below.

Applicable LUCE Update Policies
The proposed LUCE Update includes policies intended to minimize and mitigate for potential impacts to special-status wildlife. The following policies and programs, discussed under Impacts BIO-1, contribute to the mitigation of potential impacts to special-status wildlife:

- 6.0.1 Resource Planning;
- 6.0.2 Resource Mapping;
- 6.0.3 Resource Protection;
- 6.2.2 Development Limits; and
- 12.3.11 Environmental Review.

In addition to these policies and programs, the following LUCE Update policies and programs (policy language edited as part of the LUCE Update is shown using “strikeout and underline” format) address impacts related to special-status wildlife species and will further reduce impacts to less than significant levels:

1.7.6 Wildlife Habitat. The City shall ensure that continuous wildlife habitat – including corridors free of human disruption shall be preserved, and, where necessary, created.

Applicable Existing City Policies
The existing General Plan Conservation and Open Space Element (2006) includes the following goals, policies and programs intended to minimize and mitigate for potential impacts to special-status wildlife species. Please refer to Impacts BIO-1, BIO-2 and BIO-3 above, for a description of the following:

- Goal 7.2. Sustainable natural populations;
- Policy 7.3.1 Protect listed species;
- Policy 7.3.3 Wildlife habitat and corridors; and
- 7.7.1 Protect natural communities.

In addition to the goals, policies and programs listed under Impacts BIO-1 through BIO-3, the following Conservation and Open Space Element polices will further reduce impacts to special-status wildlife species:

Program 7.7.7 Preserve ecotones. Condition or modify development approvals to ensure that “ecotones,” or natural transitions along the edges of different habitat types, are preserved and enhanced because of their importance to wildlife. Natural ecotones of particular concern include those along the margins of riparian corridors, marshlands, vernal pools, and oak woodlands where they transition to grasslands and other habitat types.

Policy 7.7.8 Protect wildlife corridors. Condition development permits in accordance with applicable mitigation measures to ensure that important corridors for wildlife movement and dispersal are protected. Features of particular importance to wildlife include riparian corridors, wetlands, lake shorelines, and protected natural areas with cover and water. Linkages and corridors shall be provided to maintain connections between habitat areas.

Future development will also be required to comply with local, State, and Federal laws and policies, and all applicable permitting requirements of the regulatory and oversight agencies intended to address potential impacts to special-status wildlife species. No additional General Plan policy direction or mitigation measures are required to ensure impacts to special-status wildlife species remain less than significant. Individual development will be required to undergo separate environmental review, which may result in specific impacts that require project specific mitigation consistent with these policies.

Mitigation Measures.
Development under the LUCE Update has potential to impact special-status wildlife species within the LUCE SOI Planning Subarea. However, with incorporation of the proposed LUCE Update, and adherence to the existing City policies and state and federal regulatory requirements discussed above, future development projects with the potential to impact special-
status wildlife will be required to fully study project site resources, avoid disturbance of identified wildlife and their habitat and mitigate any impacts in accordance with qualified professionals under the authority of the jurisdictional agencies. With the incorporation of the goals, policies and programs identified above and through the requirements of the identified regulatory agencies, additional mitigation is not required.

**Significance After Mitigation.**
Implementation of proposed and existing local policies, as well as compliance with State and Federal laws and policies and the requirements of regulatory and oversight agencies as appropriate, and reliance on establishment of project-specific mitigation measures where appropriate would reduce potential impacts to a less than significant level.

**Impact BIO-5**

| 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. |

Development under the LUCE Update has potential to impact common wildlife species and species of local concern present within the LUCE SOI Planning Subarea through habitat loss, migration corridor loss from the barrier effect of new roads and developed areas, and increased noise, traffic, lighting, and human presence. Development within or adjacent to any natural habitat type within the project area would have potential to impact these wildlife species. Projects within or adjacent to habitat types that have potential to contain common wildlife species would undergo individual project environmental review to ensure that avoidance and minimization measures are included in design, construction, and ongoing uses. Project-specific mitigation measures may be required to offset impacts to common wildlife species and species of local concern associated with future project development consistent with the LUCE Update.

The proposed Airport overlay zone and compatibility criteria changes would not, in and of themselves, result in an environmental impact. However, future development in areas under the overlay zone could result in impacts and are discussed here in relation to the general development anticipated under the LUCE Update.

**Proposed LUCE Update Development Proposed and Specific Planning 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 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 disturbance of common wildlife species and species of local concern, it is important to note that these projects have not been fully developed through the advanced planning process. 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 Section 2.0 Project Description.
Proposed Land Use Element Development Special Planning Areas

- **General Hospital Site**: This area is located along the eastern boundary of the city, near the intersection of Johnson Avenue and Bishop Street and represents an urban interface with the hillsides and designated Open Space to the east. The area located behind the existing General Hospital is in direct proximity to natural communities with the potential to support common wildlife species and species of local concern. This includes, but is not limited to, potential occurrences of wildlife species associated with native grasslands and oak woodlands. Future development in this area has the potential to result in the disturbance of common wildlife species and species of local concern;

- **Los Osos Valley Road (LOVR) 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 site is primarily undeveloped and serves as a gateway to designated Open Space to the west. Undisturbed portions of the site have the potential to support common wildlife species and species of local concern, especially within areas supporting wetland and riparian habitat, which provide foraging and denning/roosting habitat. Future development of this area has the potential to result in impacts to common wildlife species and species of local concern;

Proposed Circulation Element Street Network Changes

- **Connections to Dalidio Drive from Froom Ranch Way and/or Calle Joaquin**: This area is located west of Highway 101, south of the city, and is adjacent to the San Luis Ranch Specific Plan area. This area is primarily in active agricultural production (row crops), with portions of the site consisting of some agricultural development and areas of undisturbed open space and riparian vegetation associated with San Luis Obispo Creek. Including a stand of mature eucalyptus trees associated with the existing farming complex and potential Coastal and Valley Freshwater Marsh habitat associated primarily with Prefumo Creek. This area has the potential to exhibit denning, roosting and/or foraging habitat that could support common or locally important wildlife species. The development of a connector could impact common wildlife species and species of local concern that can occur along riparian and open space areas;

- **North-South Connection between Tank Farm Road and Buckley Road**: Tank Farm and Buckley Roads are parallel streets located at the southern boundary of the city, with the San Luis Obispo Airport and the southern portion of the Chevron Tank Farm located between the two roads. The sites are located adjacent to the Avila Ranch and San Luis Obispo Creek and are relatively void of dense structural development, representing undeveloped open space with the potential for the presence of common or locally important wildlife. The potential development of a connector between these two road systems could potentially impact common wildlife species and species of local concern utilizing the foraging habitat migration corridor associated with the creek and nearby wetland habitat on the Tank Farm site;

- **Buckley Road to Los Osos Valley Road Connections**: This area is located along the southwest portion of the city, neighboring areas of relative open space, including agricultural development and some commercial and residential areas. Portions of this area between Buckley Road and Highway 101 to the west remain relatively undeveloped and have the potential to support habitat for special-status plant species. Areas to the northwest, between Buckley Road and Los Osos Valley Road, contain open areas associated with both San Luis and Prefumo Creeks that could also support this habitat. Development in this area has the potential to result in impacts to common wildlife species and species of local concern.

The potential impacts to special-status wildlife species related to implementation of the above development area projects and street network changes would be considered significant; however, incorporation of the LUCE Update and existing City goals, policies, programs discussed below would reduce impacts to less than significant levels.
Proposed Land Use Element Specific Plan Areas

- San Luis Ranch Specific Plan Area
  The San Luis Ranch Specific Plan Area consists primarily of non-native agricultural row crops found in the eastern and central portion of the site and a small amount of agricultural support development to the west. Native vegetation that exists on-site is found primarily in the riparian habitat along the banks of Prefumo Creek at the southwest border of the property. Mature non-native eucalyptus trees border the developed area on the west and along Prefumo Creek. Based on the proposed development parameters for the San Luis Ranch Specific Plan Area, development has the potential to result in impacts to common wildlife species and species of local concern associated with Prefumo Creek, agricultural activities, ruderal areas, and with Eucalyptus groves. Impacts to common wildlife and species of local concern in this area are considered less than significant with incorporation of the proposed LUCE Update, and adherence to the existing City policies and state and federal regulatory requirements discussed below.

- Madonna on Los Osos Valley Road Specific Plan Area
  The Madonna on Los Osos Valley Road Specific Plan Area is characterized by low lying relatively flat grassland areas subject to flooding in storm events near LOVR, gently climbing to a hillside environment, with some agricultural use and a small amount of support development. Based on the proposed development parameters for the site, development has the potential to result in impacts to common wildlife and species of local concern associated with wetland, riparian, annual grassland, and ruderal habitats. Impacts to common wildlife species and species of local concern in this area are considered less than significant with incorporation of the proposed LUCE Update, and adherence to the existing City policies and state and federal regulatory requirements discussed below.

- Avila Ranch Specific Plan Area
  This site is characterized by primarily agricultural development and open space associated with San Luis Obispo Creek which flows diagonally through the property from the northeast to the southwest, with some service and manufacturing uses included on a small portion of the site. Based on the proposed development parameters for the Avila Ranch Specific Plan Area, development has the potential to result in impacts to common wildlife species and species of local concern associated with San Luis Obispo Creek, riparian, and ruderal habitats. Impacts to common wildlife species and species of local concern in this area are considered less than significant with incorporation of the proposed LUCE Update, and adherence to the existing City policies and state and federal regulatory requirements discussed below.

- South Broad Street Special Planning Area
  The South Broad Street Special Planning Area is characterized as a primarily build environment, associated with the urban core of the city. Based on the proposed development parameters for the South Broad Street Special Planning Area, development of the site has the potential to result in impacts to common wildlife species and species of local concern associated with the nearby Acacia Creek. Impacts to common wildlife species and species of local concern in this area are considered less than significant with incorporation of the LUCE Update, and adherence to the existing City policies and state and federal regulatory requirements discussed below.

Applicable LUCE Update Policies
The proposed LUCE Update includes goals, policies and programs intended to minimize and mitigate for potential impacts to common wildlife and species of local concern. The following policies, discussed in detail under Impacts BIO-1 through BIO-4 above, will contribute to reducing impacts to common wildlife species and species of local concern:

- 6.0.1 Resource Planning;
- 6.0.2 Resource Mapping;
- 6.0.3 Resource Protection;
4.0 Environmental Impact Analysis

- 12.3.11 Environmental Review;
- 1.7.7 Trees Outside City Limits; and
- 1.7.6 Wildlife Habitat.

Applicable Existing City Policies
The existing General Plan Conservation and Open Space Element includes goals, policies and programs intended to minimize and mitigate for potential impacts to common wildlife and species of local concern. As discussed in detail under Impact BIO-1 and BIO-4, above, the following goals, policies and programs will reduce impacts to less than significant details:

- Goal 7.2. Sustainable natural populations;
- Goal 7.4. Trees and other plants;
- 7.3.2 Species of local concern;
- 7.3.3 Wildlife habitat and corridors;
- 7.5.4 Preservation of grassland communities and other habitat types; and
- 7.7.1 Protect natural communities policies that address impacts related to common wildlife and species of local concern.

Future development will also be required to comply with local, State, and Federal laws and policies, and all applicable permitting requirements of the regulatory and oversight agencies intended to address potential impacts to common wildlife and species of local concern. No additional General Plan policy direction or mitigation measures are required to ensure impacts to common wildlife and species of local concern remain less than significant. Individual development will be required to undergo separate environmental review, which may result in specific impacts that require project specific mitigation consistent with these policies.

Mitigation Measures
Development under the LUCE Update has potential to impact common and locally important wildlife species within the LUCE SOI Planning Subarea. However, with incorporation of the proposed LUCE Update, and adherence to the existing City policies and state and federal regulatory requirements discussed above, future development projects with the potential to impact common and locally important wildlife will be required to fully study project site resources, avoid disturbance of identified wildlife and their habitat and mitigate any impacts in accordance with qualified professionals under the authority of the jurisdictional agencies. With the incorporation of the goals, policies and programs identified above and through the requirements of the identified regulatory agencies, additional mitigation is not required.

Significance After Mitigation
Implementation of proposed and existing local policies, as well as compliance with State and Federal laws and policies and the requirements of regulatory and oversight agencies as appropriate, and reliance on establishment of project-specific mitigation measures where appropriate would reduce potential impacts to a less than significant level.

4.4.3 Cumulative Impacts
Full implementation of the proposed LUCE Update would include buildout of areas within existing city boundaries, buildout of the areas shown in Table 2.5-1 and 2.4-2, and additional development in the Specific Plan Areas. This overall increase in developed area is the basis for the biological resource impacts identified in this section. The development identified under the LUCE Update would further reduce natural habitat acreages within the city limits, and convert adjacent sparsely developed or undeveloped areas to more intensive uses, thereby altering the fundamental ability of the LUCE SOI Planning Subarea to support natural habitats and species. In general, implementation could result in the following changes:

- Removal or modification of natural habitats;
- Decrease in native plant and animal species occurrences;
- Increase in urban/wildland interface;
- Increase in ruderal/disturbed habitat areas.
The identified impacts to biological resources resulting from LUCE implementation have been addressed individually in the discussion above. When combined, these impacts reflect the cumulative impact of the proposed LUCE Update. As noted in the individual impact discussions, implementation of both the existing General Plan policies and those proposed by the LUCE Update, as well as compliance with state and federal regulations, will ensure that the biological impacts associated with the LUCE are less than cumulatively considerable.
This section analyzes the City of San Luis Obispo LUCE Update potential impacts with respect to cultural resources. Specifically, changes and impacts to culturally or historically significant resources are discussed.

4.5.1 Setting

The purpose of this section is to provide a setting for the city with respect to cultural resources and historically significant structures. The cultural setting for the city is discussed in detail in Section 6.5, Cultural Resources, of the corresponding City of San Luis Obispo General Plan Update Background Report. Please refer to the Background Report, which has been incorporated herein by reference, for additional details with respect to the city’s cultural resources setting.

The Background Report reviews the existing context for cultural resources in the City of San Luis Obispo. It describes the key cultural resources in the City, including Native American sites and historic buildings, and how these issues are addressed in the existing General Plan. It also describes the regulatory environment as it relates to cultural and historic preservation issues.

a. Pre-Historic Setting

Archaeological evidence demonstrates that Native American groups (including the Chumash) have occupied the Central Coast for at least 10,000 years, and that Native American use of the central coast region may have begun during the late Pleistocene, as early as 9000 B.C., demonstrating that historical resources began their accumulation on the central coast during the prehistoric era. Chronology of the existence of cultural resources and human settlement of the area has been divided into seven periods: Paleoindian/Paleocoastal (13,000 to 8,500 BP), Millingstone Horizon (8,500 BP to 5,500 BP), Early Period (5,500 BP to 2,600 BP), Middle Period (2,600 to 1,000 BP), Middle/Late Transition (1,000 to 750 BP), Late Period (750 to 450 BP), and Protohistoric Period (450 to 150 BP) (Jones et al. 1994; Jones and Waugh 1995).

The City of San Luis Obispo is located within the area historically occupied by the Obispeño Chumash, the northernmost of the Chumash people of California. The Obispeño Chumash occupied much of San Luis Obispo County, including the Arroyo Grande area, and from the Santa Maria River north to approximately Point Estero. The earliest evidence of human occupation in the region comes from archaeological sites along the coast (Breschini and Haversat 1982; Greenwood 1972). Ground stone, dominated by handstones and milling slabs, composes a significant portion of artifact assemblages, suggesting that procuring small seeds was an important subsistence activity in the area. Sites dating to this period include a more settled, but not permanent, occupation and increased logistical organization for activities such as hunting, fishing, and specialized processing (Breschini et al. 1983; Glassow et al. 1988).

Over several millennia, population increased gradually and settlement systems, food practices, and social structures evolved in response to changing environmental conditions, increased population density, and technological innovations such as the mortar and pestle, bow and arrow, and plank canoe. The development of such technologies not only led to increased breadth of diet and interregional travels, but interregional exchange as well, as noted by an increase in shell beads and obsidian found in coastal sites (Glassow, 1992; Jones et al. 1994; Jones and Waugh 1995; Wallace, 1978; Glassow and Wilcoxon 1988; King 1990). The period after A.D. 1000 was a time of emergent political and complexity, development of social ranking, and the rapid development of craft specialization along the Santa Barbara Channel. It was also marked by a decrease in climatic pressure. By the end of this period the Chumash population had been decimated by foreign disease and declining birthrates.
b. Historical Resources

Moving along centuries, the area of San Luis Obispo became colonialized by the Spanish Incursion initially in 1542, with the first official settlement on Chumash Territory occurring in 1772, when the Mission San Luis Obispo de Tolosa was established. Since this period, a timeline of San Luis Obispo modern occupation has been broken down into multiple smaller eras, the first of which being the Spanish Incursion mentioned above—The Mission Era lasted from 1772-1850. During this time, the structures that were built by the small settlement were a temporary church constructed of timber and tule, a granary, and a log-and-tule house for the soldiers of the mission guard. Several fires had consumed the original church structure, but a new church was built in 1793, which still stands today. A cemetery lying outside of the eastern wall of the chapel is said to hold more than 2,600 Native American and Hispanic deceased persons (Tognazzini 1993; Kocher 1972). In 1822 California became a Mexican Territory, and the mission lands gradually became private ranchos via new Mexican land grants. In 1834, the proclamation for secularization was issued, and the Mission was effectively disbanded. By that time, “missionization,” disease, and destruction of the native subsistence base had decimated the Chumash and their culture.

Immigrants began coming to the state in the 1850’s, during the Early Settlement Era (lasting from 1850-1875), mainly seeking troughs of gold. By the 1870’s (after the earliest arrivals of Chinese immigrants in 1969), a Chinatown district had been established in the downtown area near Palm and Morro Street. The new century brought with it the technology of railways, telegraph lines, and automobiles, turning San Luis Obispo into a serving station for the Pacific Coast Railway as well as for common travelers moving between San Francisco and Los Angeles.

By 1875, 2,500 residents were documented in a 4-square mile area around what is not 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 1988), and in 1903 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.

The last era of growth is said to have lasted from 1945 to the present. Many of the older (and last of-) the Chinese-owned shops and general shops were demolished by the 1950’s, and the establishment of some of the well-remembered modern stores in the area began. Closure of a portion of Monterey Street and redesign of the Mission Plaza along the front of the Mission occurred during this time as well as creation of one-way streets through downtown. Many of the residential subdivisions in the Foothill and Laguna Lake area were developed between 1945 and 1970 and the city’s population increased by 53% during this time. As new projects are proposed, the City continues to make strong efforts in conserving the natural and historical resources and character that lie within the community so as to maintain a connection to the past.
c. Paleontological Setting

The Pleistocene history of the region is marked by glacially controlled sea level fluctuations and tectonic uplift during which the shoreline advanced and retreated as much as 30 miles across the continental shelf (Hall 2007). Sea level advance cut a system of marine terraces, 12 of which are exposed in the Point San Luis area 8-9 miles southwest of the city. These terraces range in age from 83,000 to 49,000 years, and reach elevations of 79 feet above modern sea level. The formations that compose these terraces are the most paleontologically productive in the region.

The only fossil resources likely to occur in the vicinity are of Quaternary (Pleistocene) age. The Quaternary is the most recent of the three periods of the Cenozoic Era in the geologic time scale. It follows the Tertiary Period, spanning from about 2,588,000 years ago to the present. The Quaternary includes two geologic epochs: the older Pleistocene—sometimes known as the "Ice Ages"—and the younger Holocene, which began approximately 10,000 ybp (years before present).

The Pleistocene epoch began approximately 1,800,000 ybp. On the basis of vertebrate fauna from the nonmarine, late Cenozoic deposits in the San Francisco Bay region, two major divisions of Pleistocene-age fossils are recognized in California: the older Irvingtonian and the younger Rancholabrean (Woodburne 2004). The Rancholabrean fauna includes bison and other large mammals such as mammoths, mastodons, camels, horses, and ground sloths, as well as other species alive today.

Jefferson et al. (1992) reported three vertebrate localities along the coast within 9 miles of the city. These localities occur in Pleistocene fluvial deposits overlying marine terraces, and include assemblages of the Rancholabrean mammals Equus sp. and E. occidentalis (horse); Camelops sp. and C. hesternus (camel); Bison antiquus and B. latifrons (bison), and Mammut americanum (mammoth). Other, more distal localities in San Luis Obispo County are noted as well (University of California Berkeley database).

d. Regulatory Setting

The City of San Luis Obispo regulates cultural resources through implementation of adopted policies and programs. The City’s General Plan Land Use and Circulation Element Update, Conservation and Open Space Element, City Cultural Heritage Committee, Historic Preservation Ordinance, Historic Preservation Program Guidelines, Historic Context Statement, Archaeological Resource Preservation Program Guidelines as well as the implementing Historic Districts are the core of this mechanism. These resources are also regulated at the Federal level (including, by not limited to, the requirements of the National Historic Preservation Act and through the National Register of Historic Places) and at the State level as well (including, but not limited to, the California Register of Historic Resources, and through programs introduced under Senate Bill 18 requiring Native American consultation for general plan amendments). The City collaborates directly with the State Office of Historic Preservation as a member of the Certified Local Government (CLG) program. Through the CLG program, the state monitors policy development and historic resource inventories in exchange for grants and training opportunities. Please refer to Section 6.5, Cultural Resources, of the City of San Luis Obispo General Plan Background Report for a detailed discussion of the regulatory setting for cultural resources. The Conservation and Open Space Element contains several Goals and Policies that specifically address the conservation, preservation and rehabilitation of historic buildings and archaeological resources. Rather than list them in this regulatory section, impact analysis in Section 4.5.2, below includes the relevant City policies intended to mitigate the effects of growth and development.

City of San Luis Obispo Historic Preservation Ordinance: (Chapter 14.01 of the San Luis Obispo Municipal Code) The Historic Preservation Ordinance is meant to promote the public health, safety, and welfare through the identification, protection, enhancement, and preservation of those properties, structures, sites, artifacts, and other cultural resources that represent distinctive elements of San Luis Obispo’s cultural, educational, social, economic, political, and architectural history.

City of San Luis Obispo Historic Program Preservation Guidelines: This document provides guidance in review of projects that affect historic resources. It provides direction regarding treatment of historic resources, examples of compatible development in historic districts, and provides descriptions of the five historic districts and examples of typical or defining architecture in each. The Cultural Heritage Committee and City staff uses this document to help guide decision-making. (see http://www.slocity.org/communitydevelopment/Historic%20Preservation.asp)
Although not a policy document, the City’s Historic Context Statement places built resources in appropriate historic, social, and architectural context, and details the relationship between the area’s physical environment and its broader history. This document establishes significance thresholds for historic resources since it identifies the contexts, character defining features and significance criteria for each historic theme.

Archaeological Resource Preservation Program Guidelines: This document provides direction regarding archaeologically sensitive areas and sites, the process for inventorying resources, surface and subsurface evaluation, the process for mitigation and archaeological investigations; Tribal consultation process, and selection of qualified archaeological consultants. (see http://www.slocity.org/communitydevelopment/archaeologuide2009/ccfinalapproved102009.pdf)

The Cultural Heritage Committee: The Cultural Heritage Committee (CHC) is a City-designated committee that makes recommendations to decision-making bodies on matters concerning the conversation, restoration, demolition, or related-activities regarding cultural and historical resources in San Luis Obispo. A full description of this committee and its responsibilities can be found in the Background Report.

Paleontological resources are considered nonrenewable scientific resources and are protected under CEQA. Section 15065(a)(1) of the CEQA Guidelines requires a lead agency to find that a project may have a significant environmental impact if it will “eliminate important examples of the major periods of California history or prehistory.” Section 5097.5 of the Public Resources Code affirms that no person shall willingly or knowingly excavate, remove, or otherwise destroy a vertebrate paleontological site or paleontological feature without the express permission of the overseeing public land agency. It further states that any development that would adversely impact paleontological resources shall require reasonable mitigation.

4.5.2 Impact Analysis

a. Methodology and Significance Thresholds

Section 15064.5 of the CEQA Guidelines pertains to the determination of the significance of impacts to archaeological and historic resources. CEQA provides guidelines for addressing archaeological resources that may be adversely affected by development in Section 15126.4(b).

Existing City Goals and Policies, found in the Conservation and Open Space Element, generally follow the Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings and the Secretary of the Interior’s Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995), the standards are more detailed than the City’s policies. For purposes of this EIR, a project would have a significant impact on the environment if it was inconsistent with the Secretary of the Interior’s Standards.

An impact is considered significant if the proposed development scenario under the LUCE Update would result in one or more of the following conditions:

- Cause a substantial adverse change in the significance of a historical resource which is either listed or eligible for listing on the National Register of Historic Places, the California Register of Historic Resources, or a local register of historic resources;
- Cause a substantial adverse change in the significance of an archaeological resources;
- Disturb or destroy a unique paleontological resource or site or unique geologic feature; or
- Disturb any human remains, including those interred outside of formal cemeteries.
b. Project Impacts

Impact CR-1

Development allowed by the LUCE update could cause a substantial adverse change in the significance of a historical resource which is either listed or eligible for listing on the National Register of Historic Places, the California Register of Historic Resources, or a local register of historic resources. This impact is considered to be Class II, significant but mitigable.

The intensification of land uses anticipated to occur in certain areas of the city under the proposed Land Use and Circulation Element Update could have an adverse effect on historic structures by damaging or destroying historical buildings or structures, diminishing the integrity of the context and setting of individual properties, or diminishing the integrity of the historical district. The proposed Airport overlay zone and compatibility criteria changes would not, in and of themselves, result in an environmental impact. However, future development in areas under the given zones could result in impacts and are discussed here in relation to the general development anticipated under the LUCE Update.

The loss of historic buildings or new developments within the existing historic districts that could impact historical resources is considered potentially significant. However, the LUCE Update, the existing General Plan Conservation and Open Space Element (COSE), the Historic Preservation Ordinance, the Historic Districts, Historic Preservation Program Guidelines, Historic Context Statement, Archaeological Resource Preservation Program Guidelines and the City-designated Cultural Heritage Committee (CHC) policies and guidelines directly address this impact.

Proposed LUCE Update Development Special Planning 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 to historical resources, it is important to note that these projects have not been fully designed and are undergoing the advanced planning process which will result in precise project designs. 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 potential adverse effects to historical resources.

Proposed Land Use Element Development Special Planning Areas

- **Caltrans Site**: This site is located at the intersection of Madonna and Higuera Streets and contains a Master List Historic resource. Future development of the site will need to address rehabilitation or preservation of the structure consistent with COSE policies 3.2 Historical and architectural resources and 3.4 Archaeological resources. Implementation of these general plan policies, and compliance with state law, will reduce impacts to a less than significant level.

- **General Hospital Site**: This site is located off Johnson Avenue, within the Urban Reserve Line and the City limit line and is adjacent to designated Open Space. This site represents the visual limit of city development along the eastern boundary of the city, as the site climbs the hillside and associated Open Space to the east. The open space property contains a structure known as the Sunny Acres building which has been identified as having potential historic significance. Future development of the site in accordance with the LUCE Update could potentially introduce development that could impact historic resources; compliance with the COSE policies such as policy 3.3.1 through 3.3.4 and 4.0.11 that requires documentation and both conservation of existing structures and compatibility of new structures with the historic land use, as well as other existing City policies discussed below would reduce impacts to less than significant levels.
- **Broad Street @ Tank Farm Road Site**: This site is located at the southern limit of the city, representing the historic limits to the city when the area was predominantly agricultural in nature.

### Proposed Circulation Element Street Network Changes

- **Transit Center Location on Santa Rosa Street and Higuera Street**: This street intersection is within the city downtown core and represents a gateway into the commercial/retail center of the downtown core. This portion of the city includes known historic resources, such as the historic San Luis Sanitarium (later renamed French Hospital) site near the intersection of Marsh and Toro Streets. As such, future development of a Transit Center could potentially result in impacts to known historic resources.

The potential historical resource impacts related to implementation of the above development area projects and street network changes would be considered significant, however, existing City policies discussed below would reduce impacts to less than significant levels.

### Proposed Land Use Element Specific Plan Areas

- **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 planned development parameters for the San Luis Ranch Specific Plan Area have been outlined in the proposed LUCE Update in Section 2.0, Project Description. The San Luis Ranch Specific Plan Area includes one historical site complex, the Dalidio Farm Complex, which includes several structures such as the Dalidio home, Laguna Race Track viewing stands, a barn, and water tower, and is considered to be a significant historical resource. However, implementation of the proposed LUCE Update policies, existing City policies identified below, would reduce impacts to less than significant levels.

- **Madonna on Los Osos Valley Road Specific Plan Area**

  This site includes just over 111 acres and is located directly west of the intersection of Los Osos Valley Road and Calle Joaquin. The planned development parameters for the Madonna on Los Osos Valley Road Specific Plan Area have been outlined in the proposed LUCE Update in Section 2.0, Project Description.

  The Madonna on Los Osos Valley Road Specific Plan area has been used historically for agricultural activities. Development of the site, as outlined in the proposed LUCE Update, could result in adversely affecting historical resources onsite. However, implementation of the proposed LUCE Update policies, such as policy 3.5.11 that addresses preservation of archaeological or historical resources as well as implementing other City policies identified below, would reduce impacts to less than significant levels.

- **Avila Ranch Specific Plan Area**

  This site encompasses approximately 150 acres and is located on the north side of Buckley Road at the far southern edge of the city. The planned development parameters for the Avila Ranch Specific Plan Area have been outlined in the proposed LUCE Update in Section 2.0, Project Description. There are some existing buildings along the north and west consisting of service and manufacturing uses. The Avila Ranch Specific Plan Area does not contain known historical buildings or structures. Therefore, development of this expansion area in accordance with the proposed LUCE Update would result in no impact to historical resources.

- **South Broad Street Special Planning Area**

  The South Broad Street Area encompasses approximately 86 acres and is bounded by Broad Street on the west, the Union Pacific Railroad on the east, High Street to the north, and Orcutt Road to the south.

  Development in the South Broad Street Special Planning Area has the potential to impact significant historical resources by damaging or destroying historical buildings or structures within the planning area, diminishing the integrity of the context and setting of individual properties, or diminishing the integrity of the historical resources. The South Broad Street area has contributing historic residences that comprise what remains of “Little Italy”. However, implementation of the existing COSE policy 3.3.1 through 3.3.4 and LUCE policy 4.0.11 that
requires documentation and both conservation of existing structures and compatibility of new structures with the historic land use, as well as other existing City policies and ordinances identified in this section, would reduce impacts to a less than significant level.

Implementation of the proposed LUCE Update policies, and the existing City policies identified below, would reduce impacts to less than significant levels.

**Applicable LUCE Update Policies**

The General Plan Land Use Element Update draft includes edits to existing policies and programs for protect historical resources (policy language edited as part of the LUCE Update is shown using “strikeout and underline” format), while some existing language was retained after critical review:

**1.9.4 Design Standards.** The City shall require cluster Development shall:

- Be set back approximately 150 feet from public roads.

- Be screened from public views by land forms or landscaping vegetation, but not at the expense of habitat. If the visually screened locations contain sensitive habitats or unique resources as defined in the Conservation and Open Space Element, development should be avoided in those areas and instead designed to cluster in the form of vernacular farm building complexes, to blend into the traditional agricultural working landscape.

- Be located on other than prime agricultural land and be situated to allow continued agricultural use;

- Prohibit building sites and roads within stream corridors and other wetlands, on ridge lines, rock outcrops, or visually prominent or steep hillsides, or other sensitive habitats or unique resources as defined in the Conservation and Open Space Element.

- Preserve historic or archaeological resources.

**2.2.9 Compatible Development.** The City shall require that new housing built within an existing neighborhood be sited and designed to be compatible with the scale and character within that of the neighborhood. All multifamily development and large group-living facilities shall be compatible with any nearby, lower density development. Compatibility shall be evaluated using the following criteria:

- **Architectural Character.** New buildings shall respect existing buildings which contribute to neighborhood historical or architectural character, in terms of size, spacing, and variety.

A. **Front Setback Patterns**

- New development shall match the typical range of setbacks used in areas adjacent to the project.

B. **Landscaping**

- New development shall repeat or enhance the landscaping provided in parkway areas (if any exist) along street frontages.

C. **Rhythm of Development**

- New development shall reflect the rhythm of existing development in the area including features such as setbacks and façade widths along the front setback. Larger structures, such as multi-family (as allowed by the General Plan land use designation for the site) should replicate the spacing of structural components along the street frontage.

D. **Street Orientation**

- New development shall match the general orientation of existing residential structures in the adjacent area and shall provide an inviting façade facing public streets.

E. **Architecture**

- Architectural compatibility will be assessed based on a combination of factors, including height, scale, mass, form and architectural style. Desired outcome is a smooth transition between existing and proposed development, supporting a quality neighborhood.
F. **Privacy and Solar Access**

New buildings will respect the privacy and solar access of neighboring buildings and outdoor areas, particularly where multistory buildings or additions may overlook backyards of adjacent dwellings. (See also the City’s Conservation and Open Space Element.)

G. **Preservation of Natural, Historic and Cultural Features**

New development shall:

a. Respect historic context
b. Maintain mature trees on-site to the maximum extent feasible
c. Protect stream corridors and natural drainages

H. **Housing Diversity**

A mix of housing types, and a range of density within a neighborhood is generally desirable (see also Policy 2.1.6).

I. **Parking**

New development:

a. Outside of the Downtown In-lieu Parking Fee Area, new development will be required to provide adequate off-street parking to match the intended use.
b. For multi-family, parking shall be sited and designed to minimize the visual impact from the public street.

4.0.11 **Building Conservation and Compatibility.** The City shall ensure that architecturally and historically significant buildings shall be preserved and restored and that new buildings should be compatible with architecturally and historically significant buildings, but not necessarily the same style.

4.0.19 **Building Height.** New buildings shall fit within the context and vertical scale of existing development, shall not obstruct respect views from, or sunlight to, publicly-owned gathering places such as Mission Plaza, and should be stepped back above the second or third level to maintain a street façade that is consistent with the should be stepped back above the second or third level to maintain a street façade that is consistent with the historic pattern of development. Generally, new buildings should not exceed 50 feet in height. Tall buildings (50-75 feet) shall be designed to achieve multiple policy objectives, including design amenities, housing and retail land uses, such as:

A. Publicly accessible, open viewing spaces at the upper levels
B. Housing affordability in excess of the Inclusionary Housing Requirement
C. Energy efficiency beyond State mandated requirements
D. Adaptive reuse of a historical resource in a manner consistent with the Secretary of the Interior’s Standards for Rehabilitation
E. A major pedestrian connection between Higuera Street and the Creekwalk, Monterey Street and the Creekwalk, between Higuera Street and Marsh Street, or at another acceptable mid-block location.
F. High residential density (e.g. above 24 units per acre) achieved by a concentration of smaller dwelling units
G. Street level features such as a public plaza, public seating and/or public art
H. Provide midblock or other significant pedestrian connections
I. Increased retail floor area, including multi-story retail
J. Directly implements specific and identifiable City objectives, as set forth in the General Plan, the Conceptual Plan for the City’s Center, the Downtown Strategic Plan and other key policy documents
J. Receiving Transfer of Development Credits for open space protection or historic preservation
K. Proximity of housing to convenient transit connections

4.0.20 Building Width. New buildings should maintain the historic pattern of storefront widths.

12.3.5 Historic Preservation Ordinance, Guidelines, and Context Statement. Historic Preservation Ordinance and Guidelines are used by the staff, City Council, Planning Commission, Cultural Heritage Committee, and other advisory bodies in the review of projects within a historic district or on property with a listed historic resource to ensure protection of historic resources. The City’s Historic Context Statement provides information to support the review and identification of resources.

6.0.1 Resource Planning. It is the policy of the City to shall protect its unique natural resources and systems by including their considerations and needs within its planning program, and giving those considerations and needs a planning priority co-equal with that accorded other community needs. Under this policy, the City will make provisions for the continued existence of its natural resources within the community. The term “community” thus includes not only the urbanized human community, dominated by urban land development and technological systems, but also a natural community rich in biological and geological diversity, as well as a pre-urban human community with a strong agricultural base.

12.3.5 Historic Preservation Ordinance, Guidelines, and Context Statement. Historic Preservation Ordinance and Guidelines are used by the staff, City Council, Planning Commission, Cultural Heritage Committee, and other advisory bodies in the review of projects within a historic district or on property with a listed historic resource to ensure protection of historic resources. The City’s Historic Context Statement provides information to support the review and identification of resources.

12.3.11 Environmental Review. The purpose of the City’s environmental review process is to develop and maintain a high quality environment now and in the future. Some projects may be exempted from environmental review by state law or city procedures. For those projects subject to environmental review, features to be examined would include but not be limited to, toxic contamination, air quality, open space preservation, sustainability impacts, scenic values and impacts, airport operations, ground slopes, seismic hazards, soil and groundwater characteristics, wildlife habitats, road and rail traffic noise, water and sewer service limits, access and circulation, and historic and archaeological resources. Is a formal way to inform the public and decision makers of the expected consequences of their actions. Two common types of environmental documents are environmental impacts reports and “initial studies”. Before When considering proposals for a major development, such as a specific plan or special-design area, the City shall must conduct an evaluation of environmental opportunities and constraints, to which a private proposal can respond. The City is committed to early and meaningful participation by the community in the environmental review process to help inform the public and decision-makers of the potential environmental consequences of their actions. Features to be examined would include toxic contamination, airport operations, ground slopes, seismic hazards, soil and groundwater characteristics, significant wildlife habitats, road and rail traffic noise, water and sewer service limits, access and circulation, and historic and archaeological resources.

Applicable Existing City Policies
The existing General Plan Conservation and Open Space Element (2006) lists goals and policies aimed to protect historical resources which include:

3.2 Historical and architectural resources. The City will expand community understanding, appreciation and support for historic and architectural resource preservation to ensure long-term protection of cultural resources.

3.3.1 Historic preservation. Significant historic and architectural resources should be identified, preserved and rehabilitated.

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 are infeasible.
3.3.3 Historical documentation. Buildings and other cultural features that are not historically significant but which have historical or architectural value should be preserved or relocated where feasible. Where preservation or relocation is not feasible, the resource shall be documented and the information retained in a secure but publicly accessible location. An acknowledgment of the resource should be incorporated within the site through historic signage and the reuse or display of historic materials and artifacts.

3.3.4 Changes to historic buildings. Changes or additions to historically or architecturally significant buildings should be consistent with the original structure and follow the Secretary of the Interior’s Standards for the Treatment of Historic Buildings. New buildings in historical districts, or on historically significant sites, should reflect the form, spacing and materials of nearby historic structures. The street appearance of buildings which contribute to a neighborhood’s architectural character should be maintained.

3.3.5 Historic districts and neighborhoods. In evaluating new public or private development, the City should identify and protect neighborhoods or districts having historical character due to the collective effect of Contributing or Master List historic properties.

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.

3.5.11 Cultural resources and open space. Within the city limits the City should require, and outside the city limits should encourage the County to require, public or private development to do the following where archaeological or historical resources are protected as open space or parkland:

1. Preserve such resources through easements or dedications. Subdivision parcel lines or easements shall be located to optimize resource protection. Easements as a condition of development approval shall be required only for structural additions or new structures, not for accessory structures or tree removal permits. If a historic or archaeological resource is located within an open space parcel or easement, allowed uses and maintenance responsibilities within that parcel or easement shall be clearly defined and conditioned prior to map or project approval.

2. Designate such easements or dedication areas as open space or parkland as appropriate.

3. Maintain such resources by prohibiting activities that may significantly degrade the resource.

3.6 Programs. The City will do the following to protect cultural resources, and will encourage others to do so, as appropriate.

3.6.1 Cultural Heritage Committee. The City’s Cultural Heritage Committee will:

1. Help identify, and advise on suitable treatment for archaeological and historical resources.

2. Develop information on historic resources.

3. Foster public awareness and appreciation of cultural resources through means such as tours, a web site, identification plaques and awards.

4. Provide recognition for preservation and restoration efforts.

5. Communicate with other City bodies and staff concerning cultural resource issues.

6. Provide guidance to owners to help preservation and restoration efforts.

7. Review new development to determine consistency with cultural resource preservation guidelines or standards.

3.6.2 Financial assistance and incentives. The City will participate in financial assistance programs, such as low-interest loans and property tax reduction programs that encourage maintenance and restoration of historic properties.

3.6.3 Construction within historic districts. The Cultural Heritage Committee and Architectural Review Commission will provide specific guidance on the construction of new buildings within historic districts.
3.6.4 Post-disaster Historic Preservation. The City will be prepared to assess the condition of historic buildings that may be damaged by disasters and to foster their restoration whenever feasible.

3.6.6 Educational programs. The City will foster public awareness and appreciation of cultural resources by sponsoring educational programs, by helping to display artifacts that illuminate past cultures and by encouraging private development to include historical and archaeological displays where feasible and appropriate.

3.6.7 Partnering for preservation. The City will partner with agencies, non-profit organizations and citizens groups to help identify, preserve, rehabilitate and maintain cultural resources.

3.6.8 Promote adaptive reuse of historic buildings. The City will, consistent with health, safety and basic land-use policies, apply building and zoning standards within allowed ranges of flexibility, to foster continued use and adaptive reuse of historic buildings.

3.6.9 City-owned adobes and historic structures. The City will preserve and, as resources permit, rehabilitate City-owned historic adobes and other historic structures by aggressively seeking grants, donations, private-sector participation or other techniques that help fund rehabilitation and adaptive reuse.

3.6.10 Cultural Heritage Committee Whitepaper. The City will implement the recommendations of the Cultural Heritage Committee’s “Whitepaper”, including the adoption of a historic preservation ordinance.

Development facilitated under the LUCE Update will have the potential to result in impacts to historical resources. These changes are subject to the policies and regulations discussed above that target historical resource protection. The City’s Historic Preservation Ordinance, Historic Districts, and the Cultural Heritage Committee (CHC) will help govern development and redevelopment that may occur during the lifetime of the LUCE Update. All of these plans and documents work together to protect San Luis Obispo’s historical resources and are a means to retain the community character and history, while providing enhancements in certain areas of the city. Impacts will be less than significant with implementation of applicable policies and regulations. No additional policy direction is required. Individual development will be required to undergo separate environmental review, which may result in specific impacts that require project specific mitigation consistent with these policies.

Mitigation Measures

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 shall 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 are infeasible.

CR-2 3.3.5 Historic districts and neighborhoods. In evaluating new public or private development, the City should 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 shall be maintained as open space or parkland.

With the incorporation of the proposed project, adherence to existing City policies and programs discussed above, and the changes to the General Plan policy/program language required above, impacts can be avoided through the protection of known historic structures and through the study of potentially historic resources prior to construction and through measures required to preserve significant resources. The implementation of the above programs and policies and required mitigation will reduce impacts to less than significant levels.

Significance After Mitigation

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.
Impact CR-2

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.

Proposed development under the policies proposed under the LUCE Update could impact areas that contain previously identified and previously unidentified archaeological and paleontological resources such as sites containing Native American artifacts, burial sites/human remains, buildings or structures dating from the identified Mission era, or early urbanization periods. The proposed Airport overlay zone and compatibility criteria changes would not, in and of themselves, result in an environmental impact. However, future development in areas under the given zones could result in impacts and are discussed here in relation to the general development anticipated under the LUCE Update.

With regard to long-term impacts, new development or restructuring of existing buildings, roads, and related construction may disturb or unearth such resources. The degree of such impacts is dependent upon the proximity of new construction or development to previously identified archaeological and paleontological sites, and also dependent upon the level of development near previously unidentified resources. The proposed LUCE Update encourages infill development in areas already within the city. Infill development typically reduces the pressure to develop on the edges of the city, which could have impacts on previously unidentified archaeological and paleontological resources. However, due to the nature of new developments, some future structures may interfere or coincide with previously unidentified archaeological and paleontological resources.

If archaeological and paleontological resources are discovered, existing codes and policies stipulate treatment methods for evaluation and treatment of the resources. Implementation of these policies on a project-by-project basis would require the preparation of site-specific archaeological and paleontological studies in areas of potential sensitivity as well as mitigation of impacts to any identified resources.

Proposed LUCE Update Development Special Planning 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 potential adverse effects to archaeological or paleontological resources, 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 potential adverse effects to archaeological or paleontological resources.

Proposed Land Use Element Development Special Planning Areas

- **Caltrans Site:** This site is located at the intersection of Madonna and Higuera Streets and contains a Master List Historic resource. Future development of the site will need to address rehabilitation or preservation of the structure. This area has been subject to limited development and the project site consists of primarily undisturbed soils, as opposed to the majority of the other proposed Land Use Element development special planning areas located within the urban center of the city. As such, because future development of this site will likely involve grading and excavation of previously undisturbed soil and therefore the discovery of cultural resources, the site has the potential to result in impacts related to archaeological resources;
Broad Street @ Tank Farm Road Site: This site is located at the southern limit of the city, representing the historic limits to the city when the area was predominantly agricultural in nature. Some remnants of this time period remain in the area and portions of the site, primarily at the former nursery site at the northwest intersection of Tank Farm and Broad Streets and south of the Daemon Garcia Sports Center, remain relatively undeveloped. In addition, the site is in proximity to a fork of San Luis Creek and archaeological resources studied as part of the Chevron Tank Farm Remediation and Redevelopment project. As such, because future development will likely involve excavation and therefore the discovery of cultural resources this area has the potential to impact archaeological resources.

Proposed Circulation Element Street Network Changes

Mission Plaza “Dog Leg”: This site is located within the Mission San Luis Obispo de Tolosa complex. Although the Mission Plaza was historically a part of Monterey Street and has been subject to disturbance associated with both street and plaza improvements, the Mission Plaza is directly adjacent to the Mission and any ground disturbance or excavation in this area has the potential to uncover archaeological resources. As such, future construction in this project area could potentially result in impacts to archaeological resources.

Archaeological materials are fragile and non-renewable. Thus, any activity that alters the surface of the land, or excavation below the surface, can affect these resources. The cultural resource evaluation process completed for each new project requires that a resource, or the information it represents, be related to some framework held in common by all archaeologists, and thus provide a measure of reference for determining the potential significance of similar resources. This framework usually addresses research orientation, and geographic, cultural and temporal questions within the context of significance.

The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to section 5020.1(k) of the Public Resources Code), or identified in an historical resources survey (meeting the criteria in section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code sections 5020.1(j) or 5024.1. If human remains are present, such remains shall be treated in accordance with the provisions of Section 7050.5 Health and Safety Code.

If human remains are discovered or exposed during construction, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC will then contact the most likely descendent of the deceased Native American, who will serve as a consultant on how to proceed with the remains (i.e., avoid, rebury).

The potential archaeological and paleontological resource impacts related to implementation of the above development area projects and street network changes 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 similar existing City policies discussed below would reduce impacts to a less than significant level.

Proposed Land Use Element Specific Plan Areas

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 similar existing City policies discussed below would reduce impacts to a less than significant level.

- **Madonna on Los Osos Valley Road Specific Plan Area**

  This site includes just over 111 acres and is located directly west of the intersection of Los Osos Valley Road and Calle Joaquin. The Madonna on Los Osos Valley Road 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 and known availability of water resources/wetlands, there is a potential for archaeological resources to be onsite. However, if archaeological and paleontological resources are found to be present within the Madonna on Los Osos Valley Road Specific Plan Area, 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 similar existing City policies discussed below would reduce impacts to a less than significant level.

- **Avila Ranch Specific Plan Area**

  This site is primarily used for agricultural production and encompasses approximately 150 acres on the north side of Buckley Road at the far southern edge of the city. There are some existing buildings along the north and west consisting of service and manufacturing uses and a portion of San Luis Creek and associated riparian habitat can be found onsite.

  Potential development of the site, as outlined in the proposed LUCE Update, could result in 500 to 700 homes and 15,000-25,000 square feet of commercial space with 75 acres of open space. However, due to the history of the area and availability of resources associated with the onsite creek, there is a potential for archaeological resources to be on this site. However, if archaeological and paleontological resources are found 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 similar existing City policies discussed below would reduce impacts to a less than significant level.

- **South Broad Street Special Planning Area**

  The South Broad Street Area encompasses approximately 86 acres and is bounded by the Broad Street on the west, the Union Pacific Railroad on the east, High Street to the north, and Orcutt Road to the south.

  Development in the South Broad Street Special Planning Area in accordance with the South Broad Street Area Plan has the potential to impact archaeological and paleontological resources. Although this is considered unlikely due to the developed and disturbed nature of the site, redevelopment has the potential to disturb previously undisturbed areas and if archaeological and paleontological resources are found 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 similar existing City policies discussed below would reduce impacts to a less than significant level.

**Applicable LUCE Update Policies**

The Land Use Element Update includes policies/programs to protect archaeological and paleontological resources. Implementation of the following policies/programs, discussed in detail under Impact CR-1 above, will reduce impacts to less than significant levels:

- 1.9.4 Design Standards;
3.5.11 Cultural Resources and Open Space; and
3.6.11 Environmental Review.

Applicable Existing City Policies
The existing General Plan Conservation and Open Space Element (2006) includes policies/programs to protect archaeological and paleontological resources. Implementation of the following policies, discussed in detail under Impact CR-1 above, will reduce impacts to less than significant levels:

- 3.6.1 Cultural Heritage Committee; and
- 6.0.1 Resource Planning.

In addition, the following Conservation and Open Space Element policies will further reduce potential impacts to archaeological and paleontological resources:

3.4 Archeological resources. The City will expand community understanding, appreciation and support for archaeological resource preservation.

3.5.1 Archaeological resource protection. The City shall provide for the protection of both known and potential archaeological resources. To avoid significant damage to important archaeological sites, all available measures, including purchase of the property in fee or easement, shall be explored at the time of a development proposal. Where such measures are not feasible and development would adversely affect identified archaeological or paleontological resources, mitigation shall be required pursuant to the Archaeological Resource Preservation Program Guidelines.

3.5.2 Native American sites. All Native American cultural and archaeological sites shall be protected as open space wherever possible.

3.5.3 Non-development activities. Activities other than development which could damage or destroy archaeological sites, including off-road vehicle use on or adjacent to known sites, or unauthorized collection of artifacts, shall be prohibited.

3.5.4 Archaeologically sensitive areas. Development within an archaeologically sensitive area shall require a preliminary site survey by a qualified archaeologist knowledgeable in Native American cultures, prior to a determination of the potential environmental impacts of the project.

3.5.5 Archaeological resources present. Where a preliminary site survey finds substantial archaeological resources, before permitting construction, the City shall require a mitigation plan to protect the resources. Possible mitigation measures include: presence of a qualified professional during initial grading or trenching; project redesign; covering with a layer of fill; excavation, removal and curation in an appropriate facility under the direction of a qualified professional.

3.5.6 Qualified archaeologist present. Where substantial archaeological resources are discovered during construction or grading activities, all such activities in the immediate area of the find shall cease until a qualified archaeologist knowledgeable in Native American cultures can determine the significance of the resource and recommend alternative mitigation measures.

3.5.7 Native American participation. Native American participation shall be included in the City's guidelines for resource assessment and impact mitigation. Native American representatives should be present during archaeological excavation and during construction in an area likely to contain cultural resources. The Native American community shall be consulted as knowledge of cultural resources expands and as the City considers updates or significant changes to its General Plan.

3.5.8 Protection of Native American Cultural Sites. The City will ensure the protection of archaeological sites that may be culturally significant to Native Americans, even if they have lost their scientific or archaeological integrity through previous disturbance; sites that may have religious value, even though no artifacts are present; and sites that contain artifacts which may have intrinsic value, even though their archaeological context has been disturbed.
3.5.9 Archaeological site records. The City shall establish and maintain archaeological site records about known sites. Specific archaeological site information will be kept confidential to protect the resources. The City will maintain, for public use, generalized maps showing known areas of archaeological sensitivity.

3.5.10 Sunny Acres. Sufficient acreage should be provided around Sunny Acres to enable use of the property for a community center, urban garden, natural history museum and adjoining botanical garden, or similar uses.

3.6.5 Archaeological resource preservation standards. The City will maintain standards concerning when and how to conduct archaeological surveys, and the preferred methods of preserving artifacts.

In addition, implementation of the City's Archaeological Preservation Program and Guidelines (updated in 2009 to include the requirements for Native American consultation under SB18) is intended to incorporate archaeological resource preservation during the early stages of project planning and design. Property owners, developers, builders, design professionals and others involved in public or private development can use these guidelines to anticipate City concerns, protect important cultural resources, and to design their projects so as to avoid delays during development review and construction.

Development facilitated under the LUCE Update will result in impacts to archaeological and paleontological resources and undiscovered human remains. These changes are subject to the policies and regulations included in the existing and proposed policies that target historical resource protection. The City Historic Preservation Ordinance, Historic Districts, Historic Preservation Program Guidelines, Historic Context Statement, Archaeological Resource Preservation Program Guidelines and the Cultural Heritage Committee (CHC) will govern development and redevelopment that may occur during the lifetime of the LUCE Update. All of these plans and documents work together to protect San Luis Obispo’s archaeological and paleontological resources and are a means to retain the community character and history, while providing enhancements in certain areas of the city. Impacts will be less than significant with implementation of applicable policies and regulations. No additional policy direction is required. Individual development will be required to undergo separate environmental review, which may result in specific impacts that require project specific mitigation consistent with these policies.

Excavation of land, or development on previously undisturbed lands, may affect paleontological resources. General Plan Policy 3.5.1 requires protection of both archaeological and paleontological resources through compliance with the City’s Archaeological Resource Preservation Guidelines. This linkage through policy ensures that other policies such as 3.5.3 that prohibits non-development related destruction of resources; and, 3.5.11 that protects resources with open space designations; and, 3.6.5 through 3.6.7 regarding the treatment and curation of resources, would apply to paleontological resources. The existence of resources would be determined during the exploration of a development site at the time of a development proposal as required by policy 3.5.1. With implementation of the general plan policies and compliance with state law, the impact to paleontological resources is considered less than significant.

Mitigation Measures

Development facilitated by the LUCE Update could adversely affect identified and previously unidentified archaeological and paleontological resources. This includes potential disturbance of human remains. However, adherence to existing Federal, State and City policies and programs discussed above will address these impacts by requiring the study of site-specific resources, identification of significant resources present within a given project site, requirements to avoid significant resources and requirements to mitigate any impacts to these resources through project design, monitoring and Native American consultation. As such, impacts are considered less than significant.

Significance After Mitigation

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.

4.5.3 Cumulative Impacts

Cumulative buildout of the proposed LUCE Update includes buildout of areas within existing city boundaries, as well as buildout of the identified expansion areas. Overall, development under the LUCE Update would increase development
intensity within the city limits, as well as convert adjacent undeveloped areas to a more built environment, thereby altering the character of these areas.

Impacts related to cultural resources including identified and previously unidentified prehistoric and historical archaeological resources/human remains, archaeological and paleontological resources, and related to historical buildings, structures, and districts from specific components of the LUCE Update have been addressed individually in the paragraphs above.

The combination of these impacts reflects the cumulative impacts of the proposed LUCE Update. As noted above, the existing General Plan, proposed LUCE Update, Historic Preservation Ordinance, Historic Districts, Archaeological Preservation Program and Cultural Heritage Committee (CHC) protect the city’s cultural features through policies and plan review. Adherence to these requirements would reduce any impacts from buildout, as well as buildout of Specific Plan and Special Planning Areas identified in the LUCE Update to a less than significant level.
The following section introduces the primary geologic and soils issues facing the City, the regulatory framework for each and associated impacts as a result of implementation of the LUCE Update. This section covers the following issues: geologic resources, earthquakes and seismic hazards, soils, and mineral resources. Please refer to Section 4.2, Agriculture, for a detailed discussion of the existing conditions and regulatory issues related to prime soils.

4.6.1 Setting

The purpose of this section is to provide a setting for the city with respect to geologic and soil resources. The geologic and soil resources setting for the city was discussed in detail in Section 6.6, Geology and Soils, of the corresponding City of San Luis Obispo General Plan Update Background Report. Please refer to the Background Report, which is incorporated herein by reference, for additional details with respect to the city's geologic and soil resources setting.

The Background Report reviews the existing context for geologic resources in the City of San Luis Obispo. It describes the geologic conditions and related hazards of the project site, particularly faulting, seismically induced ground movement, liquefaction potential, potential for soil expansion/contraction and subsidence potential, and how these issues are addressed in the existing General Plan. It also describes the regulatory environment as it relates to the geologic and soil resource issues.

a. Geologic Setting

Regional Geology. San Luis Obispo County lies within the southern Coast Range Geomorphic Province. This province lies between the Central Valley of California and the Pacific Ocean and extends from Oregon to northern Santa Barbara County. The Coast Range province is structurally complex, and is comprised of sub-parallel northwest-southeast trending faults, folds, and mountain ranges.

Rock types in the San Luis Obispo area are mainly comprised of volcanic, metavolcanics, and a mixture of serpentinite and greywacke sandstone. These rocks are highly fractured and are part of the Mesozoic aged Franciscan Formation. Intrusive and extrusive volcanic deposits of Tertiary age and marine sedimentary deposits of the Miocene aged Monterey Formation are also found in the area. The most distinctive geomorphological feature of the San Luis Obispo area is the series of Tertiary aged volcanic plugs (remnants of volcanoes) which extend from the City of San Luis Obispo northwesterly to Morro Bay. Hollister Peak, Bishop Peak, Cerro San Luis Obispo, Islay Hill, and Morro Rock are all comprised of these volcanic plugs.

The Morros. There are over 21 major and minor peaks in the Morros, but there are nine major peaks, hence the name commonly used, “The Nine Sisters”. The nine major peaks are: Morro Rock, Black Hill, Cabrillo Peak, Hollister Peak, Cerro Romauldo, Chumash Peak, Bishop Peak, Cerro San Luis Obispo, and Islay Hill. The Nine Sisters form a divider between the Los Osos Valley and Chorro Valley, covering approximately 40 square miles.

b. Faulting and Seismic Activity

The U.S. Geological Survey defines active faults as those that have had surface displacement within Holocene time (about the last 11,000 years). Surface displacement can be recognized by the existence of cliffs in alluvium, terraces, offset stream courses, fault troughs and saddles, the alignment of depressions, sag ponds, and the existence of steep mountain fronts. Potentially active faults are ones that have had surface displacement during the last 1.6 million years. Inactive
faults have not had surface displacement within the last 1.6 million years. Regional earthquake faults are shown in Figure 4.6-1.

Faults produce ground shaking and/or surface rupture. Seismically induced ground shaking covers a wide area and is greatly influenced by the distance of the site to the seismic source, soil conditions, and depth to groundwater. Surface rupture is limited to very near the fault. Other hazards associated with seismically induced ground shaking include earthquake-triggered landslides, liquefaction, and tsunamis.

The predominant northwest-southeast trending structures of the Coast Range Province are related to the San Andreas Fault Transform Boundary. Other faults in the San Luis Obispo area that are considered active or potentially active include the San Juan Fault, the East and West Huasna Faults, the Nacimiento Fault Zone, the Oceano Fault, the Oceanic Fault, Cambria Fault, the Edna Fault, the Hosgri Fault, and the Los Osos Fault. The East and West Huasna Faults, the Nacimiento Fault Zone, the Cambria Fault, and the Edna Fault have not yet been officially classified by the California Division of Mines and Geology (CDMG, 1996).

As depicted in Figure 4.6-2, the city is located in a seismically active area. Local active and potentially active faults are shown on this figure, and represent seismic hazards related to surface displacement and seismically induced ground acceleration. These faults are further described below.

**San Andreas Fault Zone:** The San Andreas Fault Zone is the dominant active fault in California. The Carrizo segment of the San Andreas Fault is located approximately 36 miles northeast of the City. It is approximately 90 miles long and extends from Cholame down to Three Points. This segment of the San Andreas Fault is capable of producing a moment magnitude 7.2 earthquake (USGS, 1996). Higher magnitudes are possible if multiple contiguous segments rupture simultaneously (this is termed a “cascade” rupture). An estimated magnitude 7.8 earthquake occurred during a cascade type rupture of multiple segments including the Carrizo segment, in 1857.

**Los Osos Fault:** The Los Osos Fault is the closest major fault to the area. It lies approximately 4.5 miles west of the city. This reverse fault was given an earthquake recurrence interval of 1,925 years (USGS, 1996). The fault is 27 miles long and is capable of producing a magnitude 6.8 earthquake.

**The Rinconada Fault:** The Rinconada Fault is located approximately 8 miles northeast of the city. This potentially active right lateral strike slip fault is approximately 117 miles long and is capable of producing a 7.3 magnitude earthquake.

**Hosgri Fault:** The Hosgri Fault is located offshore approximately 16 miles west of the city. This right lateral strike slip fault is considered active and has a length of approximately 106 miles. The Hosgri fault is reported to be capable of producing a magnitude 7.3 earthquake.

**San Juan Fault:** The San Juan Fault is located approximately 30 miles to the northeast of the city. This right lateral strike slip fault is a direct splay of the San Andreas Fault and is considered potentially active. The fault is 42 miles in length and is capable of producing a magnitude 7.0 earthquake.

**Other Faults:** Other faults such as the La Panza, the East and West Huasna Faults, the Oceano Fault, and the Cambria Fault, are all within 20 miles of the city and are considered potentially active. However, the rupture histories and specific geometries of these faults are not as well understood as the faults mentioned above. The San Andreas and Los Osos Faults are the most likely to affect the city. The San Andreas Fault has the highest probability of rupture and the Los Osos Fault is in closest proximity to the city.
Earthquake Faults - Regional Area

Source: San Luis Obispo County, July 2001
Source: San Luis Obispo County, July 2001

Figure 4.6-2
Earthquake Faults – Local Area
4.0 Environmental Impact Analysis

**Alquist-Priolo Earthquake Fault Zone:** The Alquist-Priolo Earthquake Fault Zone (formerly known as a Special Studies Zone) is an area within 500 feet from a known active fault trace that has been designated by the State Geologist. Per the Alquist-Priolo legislation, no structure for human occupancy is permitted on the trace of an active fault. The portion of the fault zone closest to the city is located near the southern flank of the Los Osos Valley, northwest of Laguna Lake, but lies just outside of the city limits.

**Seismically Induced Ground Acceleration:** Seismically induced ground acceleration is the shaking motion that is produced by an earthquake. Probabilistic modeling is done to predict future ground accelerations, taking into consideration design basis earthquake ground motion, applicable to residential or commercial, or upper-bound earthquake ground motion, applied to public use facilities like schools or hospitals.

The probabilistic modeling approach attempts to model the probability of seismically induced ground shaking affecting a specified area. The California Division of Mines and Geology (CDMG, 1996 and 1999) developed a state-wide model that takes these variables into consideration. The model depicts peak accelerations that have a 10% probability of being exceeded in 50 years.

c. Geologic Hazards

**Landslides:** Landslides occur when the underlying support can no longer maintain the load of material above it, causing a slope failure. Ground shaking and landslide hazards are mapped by the City and are shown below in Figure 4.6-3. Much of the development in San Luis Obispo is in valleys, where there is low potential for slope instability. However, the city contains extensive hillsides. Several are underlain by the rocks of the Franciscan group, which is a source of significant slope instability. The actual risk of slope instability is identified by investigation of specific sites, including subsurface sampling, by qualified professionals. The building code requires site-specific investigations and design proposals by qualified professionals in areas that are susceptible to slope instability and landslides.

**Liquefaction:** Liquefaction is defined as the transformation of a granular material from a solid state to a liquefied state as a consequence of increased pore water pressure. As a result, structures built on this material can sink into the alluvium, buried structures may rise to the surface or materials on sloped surfaces may run downhill. Other effects of liquefaction include lateral spread, flow failures, ground oscillations, and loss of bearing strength. Liquefaction is intrinsically linked with the depth of groundwater below the site and the types of sediments underlying an area.

The soils in the San Luis Obispo area that are most susceptible to ground shaking, and which contain shallow ground water, are the ones most likely to have a potential for settlement and for liquefaction (Figure 4.6-3). The actual risk of settlement or liquefaction is identified by investigation of specific sites, including subsurface sampling, by qualified professionals. Previous investigations have found that the risk of settlement for new construction can be reduced to an acceptable level through careful site preparation and proper foundation design, and that the actual risk of liquefaction is low.

d. Other Hazards

**Differential Settlement:** Differential settlement is the downward movement of the land surface resulting from the compression of void space in underlying soils. This compression can occur naturally with the accumulation of sediments over porous alluvial soils within river valleys. Settlement can also result from human activities including improperly placed artificial fill, and structures built on soils or bedrock materials with differential settlement rates. This phenomenon can alter local drainage patterns and result in structural damage. Portions of the city have been identified as possibly being underlain by soft organic soils, resulting in a high potential for settlement.

**Subsidence:** Ground subsidence occurs where underlying geologic materials (typically loosely consolidated surficial silt, sand, and gravel) undergo a change from looser to tighter compaction. As a result, the ground surface subsides (lowers). Where compaction increases (either naturally, or due to construction), the geologic materials become more dense. As a result, the ground surface overlying the compacting subsurface materials subsides as the underlying geologic materials settle. Ground subsidence can occur under several different conditions, including:

Seismic and Landslide Hazards

Figure 4.6-3
- Ground-water withdrawal (water is removed from pore space as the water table drops, causing the ground surface to settle)
- Tectonic subsidence (ground surface is warped or dropped lower due to geologic factors such as faulting or folding); and
- Earthquake-induced shaking causes sediment liquefaction, which in turn can lead to ground-surface subsidence.

**Expansive Soils:** Expansive soils are soils that are generally clayey, swell when wetted and shrink when dried. Wetting can occur in a number of ways (i.e., absorption from the air, rainfall, groundwater fluctuations, lawn watering, broken water or sewer lines, etc.). Soil expansion can cause subtle damage that can reduce structural integrity. Portions of the city are known to exhibit the soil types (refer to Table 4.6-1) identified as having a moderate to high potential for expansion.

### e. Soils

The US Department of Agriculture has prepared a soil survey for the coastal area of San Luis Obispo County (USDA, 1977). Table 4.6-1 provides a list of the soil types found in and around the City of San Luis Obispo and includes a brief description of soil properties (please refer to Section 4.2, Agriculture, for a detailed discussion of prime soils in the city and surrounding LUCE SOI Planning Subarea).

**Table 4.6-1  City of San Luis Obispo Soil Properties**

<table>
<thead>
<tr>
<th>Map Unit Symbol</th>
<th>Map Unit Name</th>
<th>Soil Properties</th>
</tr>
</thead>
<tbody>
<tr>
<td>110</td>
<td>Briones-Tierra complex, 15 to 50 percent slopes</td>
<td>Drainage class: Somewhat excessively drained. Runoff is rapid. High shrink swell potential</td>
</tr>
<tr>
<td>120</td>
<td>Concepcion loam, 2 to 5 percent slopes</td>
<td>Moderately well drained. Moderate erosion hazard.</td>
</tr>
<tr>
<td>121</td>
<td>Concepcion loam, 5 to 9 percent slopes</td>
<td>Moderately well drained. Moderate erosion hazard.</td>
</tr>
<tr>
<td>122</td>
<td>Concepcion loam, 9 to 15 percent slopes</td>
<td>Moderately well drained. High erosion hazard.</td>
</tr>
<tr>
<td>123</td>
<td>Concepcion loam, 15 to 30 percent slopes</td>
<td>Well drained, high runoff. Very high erosion hazard.</td>
</tr>
<tr>
<td>127</td>
<td>Cibo clay, 0 to 2 percent slopes</td>
<td>Moderately well drained. Permeability is slow, runoff is slow. Erosion hazard is slight. High shrink-swell potential.</td>
</tr>
<tr>
<td>128</td>
<td>Cibo clay, 2 to 9 percent slopes</td>
<td>Moderately well drained. Permeability is slow, runoff is slow to medium. Erosion hazard is slight to moderate. High shrink-swell potential.</td>
</tr>
<tr>
<td>129</td>
<td>Diablo clay, 5 to 9 percent slopes</td>
<td>Runoff is medium; erosion hazard is slight to moderate.</td>
</tr>
<tr>
<td>130</td>
<td>Diablo and Cibo clays, 9 to 15 percent slopes</td>
<td>Runoff is medium, erosion hazard is moderate. High shrink-swell potential.</td>
</tr>
<tr>
<td>131</td>
<td>Diablo and Cibo clays, 15 to 30 percent slopes</td>
<td>Permeability is slow, runoff is rapid. Erosion hazard is severe.</td>
</tr>
<tr>
<td>132</td>
<td>Diablo and Cibo clays, 30 to 50 percent slopes</td>
<td>Permeability is slow, runoff is rapid. Erosion hazard is severe.</td>
</tr>
<tr>
<td>133</td>
<td>Diablo-Lodo complex, 15 to 50 percent slopes</td>
<td>Permeability is moderately rapid, runoff is very rapid. Erosion hazards are very severe. Moderate shrink-swell potential.</td>
</tr>
<tr>
<td>141</td>
<td>Gaviota sandy loam, 50 to 75 percent slopes</td>
<td>Somewhat excessively drained. Runoff is rapid. Erosion hazard is high.</td>
</tr>
<tr>
<td>Map Unit Symbol</td>
<td>Map Unit Name</td>
<td>Soil Properties</td>
</tr>
<tr>
<td>-----------------</td>
<td>--------------------------------------------------</td>
<td>----------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>142</td>
<td>Gaviota fine sandy loam, 15 to 50 percent slopes</td>
<td>Somewhat excessively drained. Runoff is moderate to rapid. Erosion hazard is moderate to high.</td>
</tr>
<tr>
<td>143</td>
<td>Gazos-Lodo clay loams, 15 to 30 percent slopes</td>
<td>Permeability is moderately slow, runoff is rapid. Erosion hazards are severe.</td>
</tr>
<tr>
<td>145</td>
<td>Gazos-Lodo clay loams, 50 to 75 percent slopes</td>
<td>Drainage is somewhat excessive. Runoff is very rapid. Erosion hazard is very severe.</td>
</tr>
<tr>
<td>147</td>
<td>Lodo clay loam, 5 to 15 percent slopes</td>
<td>Runoff is medium to rapid. Erosion hazard is moderate to high.</td>
</tr>
<tr>
<td>148</td>
<td>Lodo clay loam, 15 to 30 percent slopes</td>
<td>Runoff is medium to rapid. Erosion hazard is moderate to high.</td>
</tr>
<tr>
<td>149</td>
<td>Lodo clay loam, 30 to 50 percent slopes</td>
<td>Runoff is rapid. Erosion hazard is high.</td>
</tr>
<tr>
<td>150</td>
<td>Lodo clay loam, 50 to 75 percent slopes</td>
<td>Runoff is rapid. Erosion hazard is high.</td>
</tr>
<tr>
<td>152</td>
<td>Lodo-Rock outcrop complex, 30 to 75 percent slopes</td>
<td>Runoff is rapid. Erosion hazard is high.</td>
</tr>
<tr>
<td>158</td>
<td>Los Osos loam, 5 to 9 percent slopes</td>
<td>Runoff is medium. Erosion hazard is moderate.</td>
</tr>
<tr>
<td>159</td>
<td>Los Osos loam, 9 to 15 percent slopes</td>
<td>Runoff is medium. Erosion hazard is moderate.</td>
</tr>
<tr>
<td>160</td>
<td>Los Osos loam, 15 to 30 percent slopes</td>
<td>Runoff is medium. Erosion hazard is moderate.</td>
</tr>
<tr>
<td>161</td>
<td>Los Osos loam, 30 to 50 percent slopes</td>
<td>Runoff is medium to rapid. Erosion hazard is moderate to high.</td>
</tr>
<tr>
<td>162</td>
<td>Los Osos-Diablo complex, 5 to 9 percent slopes</td>
<td>Runoff is medium. Erosion hazard is moderate. High shrink swell potential.</td>
</tr>
<tr>
<td>163</td>
<td>Los Osos-Diablo complex, 9 to 15 percent slopes</td>
<td>Runoff is medium. Erosion hazard is moderate. High shrink swell potential.</td>
</tr>
<tr>
<td>164</td>
<td>Los Osos-Diablo complex, 15 to 30 percent slopes</td>
<td>Runoff is medium. Erosion hazard is moderate. High shrink swell potential.</td>
</tr>
<tr>
<td>165</td>
<td>Los Osos-Diablo complex, 30 to 50 percent slopes</td>
<td>Runoff is medium to rapid. Erosion hazard is moderate to high. High shrink swell potential.</td>
</tr>
<tr>
<td>168</td>
<td>Los Osos variant clay loam, 15 to 50 percent slopes</td>
<td>Runoff is medium. Erosion hazard is moderate. Moderate shrink swell potential.</td>
</tr>
<tr>
<td>169</td>
<td>Marimel sandy clay loam, occasionally flooded</td>
<td>Deep, somewhat poorly drained soil. Moderately slow permeability. Slow runoff. Erosion hazard is slight. Shrink swell potential is low to moderate.</td>
</tr>
<tr>
<td>170</td>
<td>Marimel silty clay loam, drained</td>
<td>Deep, somewhat poorly drained soil. Moderately slow permeability. Slow runoff. Erosion hazard is slight. Shrink swell potential is low to moderate.</td>
</tr>
<tr>
<td>183</td>
<td>Obispo-Rock outcrop complex, 15 to 75 percent slopes</td>
<td>Moderate to very steep soil. Permeability is slow, runoff is rapid to very rapid. Erosion hazard is high to very high. High serpentine content.</td>
</tr>
<tr>
<td>194</td>
<td>Riverwash</td>
<td>Active stream or river channel. Permeability is very rapid. Runoff is slow. Erosion is variable.</td>
</tr>
</tbody>
</table>
4.0 Environmental Impact Analysis

<table>
<thead>
<tr>
<th>Map Unit Symbol</th>
<th>Map Unit Name</th>
<th>Soil Properties</th>
</tr>
</thead>
<tbody>
<tr>
<td>197</td>
<td>Salinas silty clay loam, 0 to 2 percent slopes</td>
<td>Permeability is moderately slow, runoff is very slow. Erosion hazard is slight to none. Shrink Swell potential is low to moderate.</td>
</tr>
<tr>
<td>198</td>
<td>Salinas silty clay loam, 2 to 9 percent slopes</td>
<td>Permeability is moderately slow, runoff is moderate. Erosion hazard is slight. Shrink swell potential is low.</td>
</tr>
<tr>
<td>216</td>
<td>Tierra sandy loam, 2 to 9 percent slopes</td>
<td>Runoff is medium. Erosion hazard is moderate. Shrink swell potential is low.</td>
</tr>
</tbody>
</table>


f. Native Minerals

Native minerals are those occurring in the San Luis Obispo area that have, or are expected to have, economic value. Sand, gravel and stone used in construction, and metal ores, are examples of economically valuable minerals. In the past, quarries and mines in the San Luis Obispo area produced basaltic stone for masonry, “red rock” for road base and surfacing, and cinnabar, an ore of mercury.

State guidelines and rules aim for continued accessibility to native minerals, while avoiding significant harm to the environment or human health from their extraction. City Goals and Policies related to minerals and their preservation can be found in Section 6 of the Conservation and Open Space Element of the General Plan.

g. Regulatory Setting

Geologic and soils impacts are regulated primarily at the State and local level. At the State level, the California Air Resources Board is responsible for regulating impacts related to Naturally Occurring Asbestos found in soils, the California Building Code and Government Code regulates development in seismically active regions, the Alquist-Priolo Earthquake Fault Zoning Map Act regulates construction within fault zones and the State Surface Mining and Reclamation Act regulates surface mining. At the local level, the General Plan Safety Element and the City of San Luis Obispo Municipal Code attempt to safeguard life, health, property and public welfare in the City of San Luis Obispo. The City’s Safety Element is intended to guide land use planning by providing policies regarding geologic, soil, seismic, fire and flood hazards, while the California Building Code (CBC) and the City of San Luis Obispo Municipal Code control building design and construction.

In addition, the City established a program to reduce the hazards posed by unreinforced masonry buildings (URMs) in accordance with California State Laws. During the 1990s, all URMs in the City of San Luis Obispo were identified and comprehensive structural analyses were completed. Subsequently, deadlines for complete reinforcement were adopted, with changes to these deadlines following the San Simeon earthquake of December 2003. The high concentration of URM buildings in the City’s downtown has prompted a renewed effort on the City’s part to address this hazard.

The City of San Luis Obispo, along with all of Southern California and the Central Coast, is within Seismic Zone 4, the area of greatest risk and subject to the strictest building standards. Please refer to the project Background Report for further information regarding the regulatory setting for geologic and soil resources. The impact analysis in Section 4.6.2 below includes City policies intended to recognize local geologic and soil resources and mitigate the effects of growth and development.

The City of San Luis Obispo also works collaboratively with the SLO County Air Pollution Control District (SLOAPCD) for projects or developments that may have Naturally Occurring Asbestos (NOA) on the property. Depending on the nature of any proposed activities and the potential for NOA to be disturbed and dispersed, appropriate mitigation measures will be issued for the project to protect workers and surrounding environments.
4.6.2 Impact Analysis

a. Methodology and Significance Thresholds

The assessment of geology and soil impacts involves reviewing the separate regulations that control the geology and soils in the city. An impact is considered significant if the development scenario under the proposed LUCE Update would result in one or more of the following conditions:

- Substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, including liquefaction, or landslides;
- Result in substantial soil erosion or the loss of topsoil;
- Result in the loss of a unique geologic feature;
- Location of development on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse;
- Location of development on expansive soil, creating substantial risks to life or property.

It should be noted that all new development within the City is anticipated to be connected to the municipal waste disposal system. Thus, impacts related to having soils incapable of adequately supporting the use of septic tanks are not expected. This checklist item was therefore excluded from analysis in this EIR.

b. Project Impacts

<table>
<thead>
<tr>
<th>Impact GEO-1</th>
</tr>
</thead>
<tbody>
<tr>
<td>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>
</tr>
</tbody>
</table>

The LUCE Update policies would facilitate the development and redevelopment of lands within the city. These areas include land with potential geologic hazards and soil types conducive to liquefaction and other stability risks. The City of San Luis Obispo is located in Seismic Zone 4, the highest level of potential earthquake threat in the State of California. However, the city contains no Alquist-Priolo fault rupture zones.

Figure 3 of the Safety Element of the General Plan shows mapped and inferred faults within the vicinity of the proposed project. While outside of the Planning Area, the Los Osos Fault is identified under the California Alquist Priolo Fault Hazards Act. No hazards related to fault rupture would be expected because no historically active, active or potentially active faults are located within or in the immediate vicinity of the city. However, regional faults that could result in strong ground shaking including the San Andreas, San Juan Fault, the East and West Huasna Faults, the Nacimiento Fault Zone, the Oceano Fault, the Oceanic Fault, Cambria Fault, the Edna Fault, the Hosgri Fault, and the Los Osos Fault. The range of maximum probable magnitudes for earthquakes emanating from these faults ranges from 6.5 to 7.8.

The proposed Airport overlay zone and compatibility criteria changes would not, in and of themselves, result in an environmental impact. However, future development in areas under the overlay zone could result in impacts.

New development within the city will comply with the most current version of the California Building Code (CBC) adopted by the City. The City periodically updates the version of the CBC in use to keep current with changes in technology and research regarding building construction and safety. The City’s adoption of the CBC includes standards for new construction affecting plumbing, electrical, construction unreinforced masonry, wells, property maintenance. Compliance with the CBC, the City of San Luis Obispo Municipal Code and policies described below, would minimize the risk to life and property from structural damage from seismic events.
Proposed LUCE Update Development Proposed and Specific Planning 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 Special Planning Areas) 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 seismic events, it is important to note that these projects have not been fully developed through the advanced planning process. 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 Section 2.0 Project Description.

Proposed Land Use Element Development Special Planning Areas

- **Foothill @ Santa Rosa Area**: This is an urbanized area of the city core and is located at the northern end of the city, serving as a gateway into the city (and the Cal Poly campus) for southbound travelers along Highway 1. 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;

- **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;

- **General Hospital Site**: This area is located along the eastern boundary of the city, near the intersection of Johnson Avenue and Bishop Street and represents an urban interface with the hillsides and designated Open Space to the east. Future residential 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;

- **Sunset Drive-In Site**: This site is located near the intersection of Prado Road and Elks Lane, at the southern boundary of the city, just east of Highway 101. The consideration of 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;

- **Pacific Beach Site**: This site is located adjacent to the Prefumo Creek Commons shopping center, on Los Osos Valley Road, just south of the Madonna Road intersection. The site currently supports the Pacific Beach continuation school. Future Commercial Retail development of this site would introduce new structures with the potential to result in human health and safety impacts during seismic events;

- **Calle Joaquin Auto Sales Area**: This portion of Calle Joaquin is parallel to and west of Highway 101, south of the city, and is adjacent to the San Luis Ranch Specific Plan area. 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;

- **Los Osos Valley Road (LOVR) 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 site is primarily undeveloped and serves as a gateway to designated Open Space to the west. Future residential 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;

- **Broad Street @ Tank Farm Road Site**: This site is located at the southern limit of the city, representing the historic limits to the city when the area was predominantly agricultural in nature. The area currently supports the Marigold Shopping Center and the mixed use commercial/office development adjacent to the Shell Station. Future mixed use development envisioned under the LUCE Update has the potential to introduce new structures with the possibility to result in human health and safety impacts during seismic events;
Proposed Circulation Element Street Network Changes

- **Transit Center Location on Santa Rosa Street and Higuera Street**: This street intersection is within the city downtown core and represents a gateway into the commercial/retail center of the downtown core. The development of a future Transit Center, as envisioned under the LUCE Update, would have the potential to introduce new structures with the possibility to result in human health and safety impacts during seismic events;

- **Prado Road Interchange vs. Overpass**: The location of a potential Highway 101 interchange or overpass in this area, located at the southern boundary of the city potentially connecting Prado Road (east of the Highway) to the area near San Luis Ranch, Dalidio Drive and the Promenade Shopping Center (west of the Highway), has the potential to introduce structural development with possible impacts related to seismic safety;

The potential human health and safety impacts from seismic events related to implementation of the above development area projects and street network changes would be considered significant; however, new development would conform to the California Building Code (CBC). Proper engineering, including compliance with the CBC, the City of San Luis Obispo Municipal Code and policies described below, would minimize the risk to life and property and would reduce impacts to less than significant levels.

Proposed Land Use Element Specific Plan Areas

- **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 planned development parameters for the San Luis Ranch Specific Plan Area have been outlined in the proposed LUCE Update in Section 2.0, Project Description. The San Luis Ranch site is characterized primarily by its use as an agricultural property which is primarily undeveloped with the exception of ranch-support structures.

  The San Luis Ranch Specific Plan Area development potential, as outlined in the proposed LUCE Update, could result in areas prone to geologic hazards and in underlying soil types that are conducive to liquefaction and other stability risks. However, new development would conform to the California Building Code (CBC). Proper engineering, including compliance with the CBC, the City of San Luis Obispo Municipal Code and policies described below, would minimize the risk to life and property. Impacts to new development from groundshaking would therefore be less than significant.

- **Madonna on Los Osos Valley Road Specific Plan Area**
  
  This site includes just over 111 acres and is located directly west of the intersection of Los Osos Valley Road and Calle Joaquin. The planned development parameters for the Madonna on Los Osos Valley Road Specific Plan Area have been outlined in the proposed LUCE Update in Section 2.0, Project Description. The Madonna on Los Osos Valley Road site is characterized primarily by its use as an agricultural property which is primarily undeveloped.

  The Madonna on Los Osos Valley Road Specific Plan Area development potential, as outlined in the proposed LUCE Update, could result in areas prone to geologic hazards and in underlying soil types conducive to liquefaction and other stability risks. However, new development would conform to the California Building Code (CBC). Proper engineering, including compliance with the CBC, the City of San Luis Obispo Municipal Code and policies described below, would minimize the risk to life and property. Impacts to new development from groundshaking would therefore be less than significant.

- **Avila Ranch Specific Plan Area**
  
  This site encompasses approximately 150 acres and is located on the north side of Buckley Road at the far southern edge of the city. Although there are some existing buildings along the north and west consisting of service and manufacturing uses, the remainder of the property is in agricultural use and relatively undeveloped.

  The Avila Ranch Specific Plan Area development potential, as outlined in the proposed LUCE Update, could result in 500 to 700 homes and 15,000-25,000 square feet of commercial space with 75 acres of open space. This could result in development in areas prone to geologic hazards and in soil types conducive to liquefaction and other stability risks. It is important to note that new development under a future Specific Plan would be required to
4.0 Environmental Impact Analysis

conform to the California Building Code (CBC). Proper engineering, including compliance with the CBC, the City of San Luis Obispo Municipal Code and policies described below, would minimize the risk to life and property. As such, impacts to new development from ground shaking would therefore be less than significant.

- **South Broad Street Special Planning Area**

The South Broad Street Area encompasses approximately 86 acres and is bounded by the Broad Street on the west, the Union Pacific Railroad on the east, High Street to the north, and Orcutt Road to the south. The South Broad Street Special Planning Area has been the subject of advanced planning and public outreach efforts by the City resulting in the City Council’s endorsement of the “Draft South Broad Street Area Plan” on September 17, 2013.

The South Broad Street Special Planning Area is located on Broad Street which is an existing developed area. Development of the area, as outlined in the proposed LUCE Update, could occur in areas that are susceptible to damages from future seismic events, creating structural damage or health and safety risks. However, new development would conform to the California Building Code (CBC) and the Unreinforced Masonry Hazard Mitigation Program. Proper engineering, including compliance with the CBC, the City of San Luis Obispo Municipal Code and policies described below, would minimize the risk to life and property. Impacts to new development from ground shaking would therefore be less than significant.

**Applicable LUCE Update Policies**

The General Plan Land Use Element Update includes the following policies to protect against seismic events, creating structural damage or health and safety risks which include: (note to reader that strikeout text is proposed for deletion from the existing LUCE and underlined text is proposed for insertion as part of the proposed project. The changes are included here to provide the policy statements in context.

**6.2 Hillside Policies [RELEVANT PORTION]**

**6.2.1** The City shall maintain establishes comprehensive standards and policies for hillside development for the following reasons:

C. To protect the health, safety and welfare of community residents by directing development away from areas with hazards such as landslides, wildland fires, flooding and erosion.

**6.2.2 Development Limits.** The City shall establish and maintain clear development limit lines for hillside planning areas and should have carefully chosen development limit lines, and special design standards for the hillside areas which can be developed. The location of the development limit and the standards should cause development to avoid encroachment into sensitive habitats or unique resources as defined in the Conservation and Open Space Element, and public health and safety problems related to utility service, access, wildland fire hazard, erosion, flooding, and landslides and other geologic hazards. Also, the development limit line and the standards should help protect the City’s scenic setting. (Locations of hillside planning areas are shown in Figure 6 of the LUCE Update. More precise locations of the development limit line and the urban reserve line are shown on large-scale aerial photographs on file at the Community Development Department; these are part of the Land Use Element.)

**Applicable Existing City Policies**

The existing General Plan Safety Element (2006) lists policies to protect against seismic events, creating structural damage or health and safety risks which include:

**5.5 Policy S: Avoiding Faults.** Development shall not be located atop known faults. Applications for the following types of discretionary approvals within 100 meters (330 feet) of any fault that is previously known or discovered during site evaluation shall be subject to review and recommendation by a State-registered engineering geologist: change to a more intensive land-use designation; subdivision into five or more parcels; development of multifamily, commercial, industrial, or institutional buildings.
5.6 Policy S: Avoiding Slope Instability. Development shall not be located on or immediately below unstable slopes, or contribute to slope instability. Any development proposed in an area of moderate or high landslide potential shall be subject to review and recommendation by a State-registered engineering geologist.

The City Municipal Code identifies building requirements to ensure the safety of life and property through the regulation of development under Title 15 Building and Construction, Section 15.04 – Construction and Fire Prevention Regulations. The municipal code establishes minimum submittal requirements and establishes a process for review of plans by licensed professionals. The review process, coupled with the development standards established in the CBC, ensures that all construction is designed to address the potential for seismic events thereby minimizing the potential for structural damage.

Adherence to the existing City’s General Plan, the proposed LUCE Update, the City of San Luis Obispo Municipal Code, Unreinforced Masonry Hazard Mitigation Program, and compliance with the California Building Code, will ensure that development consistent with the LUCE will be While no additional policy direction is required, individual development request is required to undergo inspection to ensure compliance of the CBC which may result in project-specific design requirements.

Mitigation Measures

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. With the incorporation of the proposed project and adherence to existing City policies and programs discussed above, seismic impacts are addressed through both State building standards and local requirements for structural safety. Additional mitigation is not required.

Significance After Mitigation

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.

Impact GEO-2

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.

The LUCE Update policies would facilitate the development and redevelopment of lands within the city. Areas near San Luis Obispo Creek, Prefumo Creek, and other low lying areas are susceptible to high groundwater occurrences. Figure 5: Groundshaking & Landslide Hazards shows that much of the existing City has high liquefaction potential. The General Plan Safety Element 5.7 Policy S: Avoiding Liquefaction Hazards and the California Building Code (CBC) requires the preparation of site-specific investigations and design proposals by qualified professionals in areas that are susceptible to settlement and liquefaction. Design modifications to address the potential for liquefaction can include soil amendments, additional building or foundation reinforcement, changing the foundation designed to tie more of the building components together and deeper foundations designed to reach more stable soils. The design is dependent upon a number of project and site-specific features such as building type, size, occupancy, soil types, and depth to groundwater. Because this is a programmatic EIR this information is unknown and therefore the City has policies and ordinances in effect to ensure that each building design addresses the potential for liquefaction. Compliance with Safety Element policies and CBC requirements would ensure that impacts remain less than significant. The proposed Airport overlay zone and compatibility criteria changes would not, in and of themselves, result in an environmental impact. However, future development in areas under the given zones could result in impacts and are discussed here in relation to the general development anticipated under the LUCE Update.
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Proposed LUCE Update Development Proposed and Specific Planning 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 Special Planning Areas) 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 liquefaction, it is important to note that these projects have not been fully developed through the advanced planning process. 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 Section 2.0 Project Description.

Proposed Land Use Element Development Special Planning Areas

- **Foothill @ Santa Rosa Area**: This is an urbanized area of the city core and is located at the northern end of the city, serving as a gateway into the city (and the Cal Poly campus) for southbound travelers along Highway 1. Because of the proximity to a creek and unknown depth to groundwater at this site, future mixed use development in this area, as envisioned under the LUCE Update, would introduce new structures with the potential to result in liquefaction impacts during seismic events;

- **Caltrans Site**: This area is located near the Marsh Street off-ramp on Highway 101, at the intersection of Higuera Street and Marsh Street, adjacent to San Luis Obispo Creek. The consideration of future mixed use development in this area, as envisioned under the LUCE Update, would introduce new structures in low lying areas near a creek with potential alluvial deposits. Future development in this area could potentially result in impacts related to liquefaction during seismic events;

- **Sunset Drive-In Site**: This site is located near the intersection of Prado Road and Elks Lane, at the southern boundary of the city, just east of Highway 101 and adjacent to San Luis Obispo Creek. The consideration of future mixed use development in this area, as envisioned under the LUCE Update, would introduce new structures in low lying areas near a creek with potential alluvial deposits. Future development in this area could potentially result in impacts related to liquefaction during seismic events;

- **Calle Joaquin Auto Sales Area**: This portion of Calle Joaquin is parallel to and west of Highway 101, south of the city, and is adjacent to the San Luis Ranch Specific Plan area and near the confluence of San Luis Obispo and Prefumo Creeks. The consideration of future mixed use development in this area, as envisioned under the LUCE Update, would introduce new structures in low lying areas near a creek with potential alluvial deposits. Future development in this area could potentially result in impacts related to liquefaction during seismic events;

- **Los Osos Valley Road (LOVR) 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). Low lying areas near this have the potential for flooding during heavy rain events. The consideration of future mixed use development in this area, as envisioned under the LUCE Update, would introduce new structures in low lying areas with potential alluvial deposits. Future development in this area could potentially result in impacts related to liquefaction during seismic events;

- **Broad Street @ Tank Farm Road Site**: This site is located at the southern limit of the city, representing the historic limits to the city when the area was predominantly agricultural in nature. The area currently supports the Marigold Shopping Center and the mixed use commercial/office development adjacent to the Shell Station. This is a low lying area near a tributary to San Luis Obispo Creek. The consideration of future mixed use development in this area, as envisioned under the LUCE Update, would introduce new structures in low lying areas with potential alluvial deposits. Future development in this area could potentially result in impacts related to liquefaction during seismic events;

Proposed Circulation Element Street Network Changes

- **Prado Road Interchange vs. Overpass**: The location of a potential Highway 101 interchange or overpass in this area, located at the southern boundary of the city potentially connecting Prado Road (east of the Highway) to the area near San Luis Ranch, Daidio Drive and the Promenade Shopping Center (west of the Highway), has the
potential to introduce structural development in a low lying area near San Luis Obispo and Prefumo Creeks and could result in impacts related to liquefaction during seismic events;

The potential human health and safety impacts from liquefaction events related to implementation of the above development area projects and street network changes could be considered significant; however, new development would conform to the California Building Code (CBC). Proper engineering, including compliance with the CBC, the City of San Luis Obispo Municipal Code and policies described below, would minimize the risk to life and property and would reduce impacts to less than significant levels.

Proposed Land Use Element Specific Plan Areas

- **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 and is characterized primarily by its use as an agricultural property which is mainly undeveloped outside of a small amount of agricultural support structures.

  The majority of the San Luis Ranch property is near San Luis Obispo Creek and Prefumo Creek and the associated low lying areas. Therefore, development in these areas could be subject to liquefaction hazards. However, new development would conform to the California Building Code (CBC). Proper engineering, including compliance with the CBC, the City of San Luis Obispo Municipal Code and policies described below, would reduce impacts from settlement and liquefaction to less than significant.

- **Madonna on Los Osos Valley Road Specific Plan Area**

  This site includes just over 111 acres and is located directly west of the intersection of Los Osos Valley Road and Calle Joaquin and is characterized primarily by its use as an agricultural property which is mainly undeveloped.

  A portion of the Madonna on Los Osos Valley Road Specific Plan Area is near San Luis Obispo Creek and the associated low lying areas and wetlands. Therefore, development in these areas could be subject to liquefaction hazards. However, new development would conform to the California Building Code (CBC). Proper engineering, including compliance with the CBC, the City of San Luis Obispo Municipal Code and policies described below, would reduce impacts from settlement and liquefaction to less than significant.

- **Avila Ranch Specific Plan Area**

  This site encompasses approximately 150 acres and is located on the north side of Buckley Road at the far southern edge of the city. There are some existing buildings along the north and west consisting of service and manufacturing uses with the remainder either undeveloped or currently in agricultural production (e.g., livestock grazing).

  The Avila Ranch Specific Plan Area development potential, as outlined in the proposed LUCE Update, could result in 500 to 700 homes and 15,000-25,000 square feet of commercial space with 75 acres of open space. A portion of this plan area is near San Luis Obispo Creek and the associated low lying areas and wetlands. Therefore, development in these areas could be subject to liquefaction hazards. However, new development would conform to the California Building Code (CBC). Proper engineering, including compliance with the CBC, the City of San Luis Obispo Municipal Code and policies described below, would reduce impacts from settlement and liquefaction to less than significant.

- **South Broad Street Special Planning Area**

  The South Broad Street Area encompasses approximately 86 acres and is bounded by the Broad Street on the west, the Union Pacific Railroad on the east, High Street to the north, and Orcutt Road to the south.

  The South Broad Street Special Planning Area is located within the existing urban center of the city and is characterized as a primarily developed area. Portions of this area are located near Acacia Creek and future development could occur within soil types conducive to liquefaction. However, new development would be required to conform to the California Building Code (CBC). Proper engineering, including compliance with the
4.0 Environmental Impact Analysis

CBC, the City of San Luis Obispo Municipal Code and policies described below, would reduce impacts from settlement and liquefaction to less than significant.

Applicable Existing City Policies

The existing General Plan Safety Element (2006) lists policies to prevent or mitigate development in areas with potential for a seismic event that could result in liquefaction of soils which include:

5.7 Policy 5: Avoiding Liquefaction Hazards. Development may be located in areas of high liquefaction potential only if a site-specific investigation by a qualified professional determines that the proposed development will not be at risk of damage from liquefaction. The Chief Building Official may waive this requirement upon determining that previous studies in the immediate area provide sufficient information.

In addition, implementation of the Safety Element policy 5.6 Policy 5: Avoiding Slope Instability discussed under Impact GEO-1 above would also reduce impacts related to liquefaction potential. The City Municipal Code also includes building requirements to ensure the safety of life and property through the regulation of development under Title 15 Building and Construction, Section 15.04 – Construction and Fire Prevention Regulations. Adherence to the existing City’s General Plan, the proposed LUCE Update, the City of San Luis Obispo Municipal Code, and compliance with the California Building Standards, will ensure that potential liquefaction impacts remain less than significant. No additional policy direction is required. Individual development will be required to undergo separate environmental review, which may result in specific impacts that require project specific mitigation consistent with these policies.

Mitigation Measures

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. However, with the requirements for site-specific surveys in areas of high liquefaction potential, and adherence to existing City policies and programs discussed above, additional mitigation is not required.

Significance After Mitigation

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.

Impact GEO-3

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.

As depicted in Table 4.6-1, several soils within the City of San Luis Obispo have moderate shrink-swell potential. The potential for soil settlement could result in significant impacts to new development in these areas. The shrink-swell characteristics of soils can vary widely within short distances, depending on the relative amount and type of clay. In addition, soils throughout the City of San Luis Obispo have high to very high erosion potential (refer to Table 4.6-1). Structures and facilities constructed on highly erosive soils, as well as occupants of the structures, would have the potential to be exposed to hazards related to erosion. The proposed Airport overlay zone and compatibility criteria changes would not, in and of themselves, result in an environmental impact. However, future development in areas under the overlay zone could result in impacts and are discussed here in relation to the general development anticipated under the LUCE Update.

Additionally, the city is home to unique geologic features in the form of the “Morros”, consisting of remnants of the core of the volcanic chain referred to as the “Nine Sisters”. Development in these areas is regulated by the City though the hillside development policies discussed under Impact GEO-1. With the detailed hillside development requirements, impacts are considered less than significant. The protection of the unique Morros chain is also addressed under Policy 6.2 of the LUCE Update.
The California Building Code (CBC) includes requirements to address soil related hazards. Typical measures included in the CBC requirements intended to treat hazardous soil conditions involve removal, proper fill selection, and compaction. Expansion, erosion, or large-scale settlement problems would not be a substantial constraint to development of individual sites provided that adequate soil and foundation studies are performed prior to construction in accordance with existing General Plan policies and that Building Code guidelines are followed. As discussed in Impact GEO-2, the City requires the completion of detailed soils reports and ensures that the project design follows the recommendation in the report. As the soils report and design features are site specific, the information cannot be available for the General Plan Level programmatic EIR.

**Proposed LUCE Update Development Proposed and Specific Planning 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 Special Planning Areas) 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 expansive soils or a loss in a unique geologic feature, it is important to note that these projects have not been fully developed through the advanced planning process. 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 Section 2.0 Project Description.

**Proposed Land Use Element Development Special Planning Areas**

- **Foothill @ Santa Rosa Area:** This is an urbanized area of the city core and is located at the northern end of the city, serving as a gateway into the city (and the Cal Poly campus) for southbound travelers along Highway 1. Future mixed use development in this area, as envisioned under the LUCE Update, would introduce new structures with the potential to result in soil related safety impacts;

- **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 soil related safety impacts;

- **General Hospital Site:** This area is located along the eastern boundary of the city, near the intersection of Johnson Avenue and Bishop Street and represents an urban interface with the hillsides and designated Open Space to the east. Future residential development in this area, as envisioned under the LUCE Update, would introduce new structures with the potential to result in soil related safety impacts;

- **Sunset Drive-In Site:** This site is located near the intersection of Prado Road and Elks Lane, at the southern boundary of the city, just east of Highway 101. The consideration of future mixed use development in this area, as envisioned under the LUCE Update, would introduce new structures with the potential to result in soil related safety impacts;

- **Pacific Beach Site:** This site is located adjacent to the Prefumo Creek Commons shopping center, on Los Osos Valley Road, just south of the Madonna Road intersection. The site currently supports the Pacific Beach continuation school. Future Commercial Retail development of this site would introduce new structures with the potential to result in soil related safety impacts;

- **Calle Joaquin Auto Sales Area:** This portion of Calle Joaquin is parallel to and west of Highway 101, south of the city, and is adjacent to the San Luis Ranch Specific Plan area. Future mixed use development in this area, as envisioned under the LUCE Update, would introduce new structures with the potential to result in soil related safety impacts;

- **Los Osos Valley Road (LOVR) 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 site is primarily undeveloped and serves as a gateway to designated Open Space to the west. Future residential development in this area, as envisioned under the LUCE Update, would introduce new structures with the potential to result in soil related safety impacts;
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- **Broad Street @ Tank Farm Road Site**: This site is located at the southern limit of the city, representing the historic limits to the city when the area was predominantly agricultural in nature. The area currently supports the Marigold Shopping Center and the mixed use commercial/office development adjacent to the Shell Station. Future mixed use development envisioned under the LUCE Update has the potential to introduce new structures with the possibility to result in soil related safety impacts;

**Proposed Circulation Element Street Network Changes**

- **Transit Center Location on Santa Rosa Street and Higuera Street**: This street intersection is within the city downtown core and represents a gateway into the commercial/retail center of the downtown core. The development of a future Transit Center, as envisioned under the LUCE Update, would have the potential to introduce new structures with the possibility to result in soil related safety impacts;

- **Prado Road Interchange vs. Overpass**: The location of a potential Highway 101 interchange or overpass in this area, located at the southern boundary of the city potentially connecting Prado Road (east of the Highway) to the area near San Luis Ranch, Dalidio Drive and the Promenade Shopping Center (west of the Highway), has the potential to introduce structural development which could result in soil related safety impacts;

The potential safety impacts from soil hazards related to implementation of the above development area projects and street network changes would be considered significant; however, new development would conform to the California Building Code (CBC). Proper engineering, including compliance with the CBC, the City of San Luis Obispo Municipal Code, the City’s hillside development regulation and the policies described below, would minimize the risk to life and property and would reduce impacts to less than significant levels.

**Proposed Land Use Element Specific Plan Areas**

- **San Luis Ranch Specific Plan Area**
  This 132 acre area is characterized primarily by its use as an agricultural property which is mainly undeveloped with the exception of a small amount agricultural support structures.

  According to the soils map shown in Section 4.2, Agricultural Resources, the San Luis Ranch property contains soils with moderate shrink-swell potential and high erosion potential. Therefore, development in these areas could occur on soils that have the potential to present hazards. However, new development would conform to the CBC. Proper engineering, including compliance with the CBC, the City of San Luis Obispo Municipal Code and policies described below, would reduce impacts from expansive soils, erosive soils, and differential settlement to less than significant.

- **Madonna on Los Osos Valley Road Specific Plan Area**
  This site includes just over 111 acres and is located directly west of the intersection of Los Osos Valley Road and Calle Joaquin and is characterized primarily by its use as an agricultural property which is mainly undeveloped.

  According to the soils map discussed above, the Madonna on Los Osos Valley Road Specific Plan Area has the potential to contain soils with moderate shrink-swell potential and high erosion potential. Therefore, development in these areas could occur on soils that have the potential to present hazards related to shrink/swell potential, differential settlement and erosion. However, new development would be required to conform to the CBC. Proper engineering, including compliance with the CBC, the City of San Luis Obispo Municipal Code and policies described below, would reduce impacts from expansive soils, erosive soils, and differential settlement to less than significant.

- **Avila Ranch Specific Plan Area**
  This site encompasses approximately 150 acres located on the north side of Buckley Road at the far southern edge of the city. There are some existing buildings along the north and west site boundaries consisting of service and manufacturing uses with the remainder undeveloped or used for agriculture.
The Avila Ranch Specific Plan Area development potential, as outlined in the proposed LUCE Update, could result in 500 to 700 homes and 15,000-25,000 square feet of commercial space and 75 acres of open space. According to the city soils map, the site has the potential to contain soils with moderate shrink-swell potential and high erosion potential. Therefore, development in these areas could occur on soils that have the potential to present hazards related to differential settlement, expansive soils and erosion. However, new development would be required to conform to the CBC. Proper engineering, including compliance with the CBC, the City of San Luis Obispo Municipal Code and policies described below, would reduce impacts from expansive soils, erosive soils, and differential settlement to less than significant.

- **South Broad Street Special Planning Area**

  The South Broad Street Area encompasses approximately 86 acres and is bounded by the Broad Street on the west, the Union Pacific Railroad on the east, High Street to the north, and Orcutt Road to the south.

  The South Broad Street Special Planning Area is located on Broad Street which is an existing developed area within the urban core of the city. Development of the area, as outlined in the proposed LUCE Update, could result in development in areas that may be located in soils that have moderate shrink-swell potential and high erosion potential. However, new development would be required to conform to the CBC. Proper engineering, including compliance with the CBC, the City of San Luis Obispo Municipal Code and policies described below, would reduce impacts from settlement and liquefaction to less than significant.

**Applicable LUCE Update Policies**

The LUCE Update includes policies to prevent or mitigate development in areas with potential for soils hazards such as differential settlement, shrink/swell potential, erosion and expansive soils. As discussed under Impact GEO-1, the hillside policies from Chapter 6 of the Land Use Element address development in areas subject to erosion and other soil hazards associated with steep slopes. This includes the following:

- 6.2 Hillside Policies [Relevant Portion];
- 6.2.1 The City shall maintain establishes comprehensive standards and policies for hillside development; and
- 6.2.2 Development Limits

**Applicable Existing City Policies**

As discussed under Impact GEO-1, implementation of the following policy from the General Plan Safety Element will address potential development impacts related to soil hazards

- 5.6 Policy S: Avoiding Slope Instability

In addition, the City Municipal Code identifies building requirements to ensure the safety of life and property through the regulation of development under Title 15 Building and Construction, Section 15.04 – Construction and Fire Prevention Regulations. This would include the Unreinforced Masonry Hazard Mitigation Program.

Adherence to the existing City’s General Plan, the proposed LUCE Update, the City of San Luis Obispo Municipal Code, and implementing proper engineering, including compliance with the California Building Standards, will ensure that potential expansive soils, erosive soils, and differential settlement impacts remain less than significant. No additional policy direction is required. Individual development will be required to undergo separate environmental review, which may result in specific impacts that require project specific mitigation consistent with these policies.

**Mitigation Measures**

Development facilitated by the LUCE Update could occur on soils that have the potential to present 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, with the incorporation of the proposed project and adherence to existing City policies and programs discussed above, additional mitigation is not required.
Significance After Mitigation

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.

Impact GEO-4

| 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. |

As shown on the Seismic and Landslide Hazards map in the Figure 4.6-3, potential slope hazards occur outside of the existing city limits. Much of the development in San Luis Obispo is in valleys, where there is low potential for slope instability. However, as shown in Figure 5 of the Safety Element, the city contains extensive hillsides, several of which are underlain by the rocks of the Franciscan group, which is a source of significant slope instability. Although buildout in accordance with the proposed LUCE Update within the existing city limits would be less likely to result in development in landslide hazard areas, the introduction of new development in the identified expansion areas that exhibit landslide hazards would have the potential to result in significant impacts related to slope instability. As discussed in Impact GEO-2, the City requires the completion of detailed soils reports and ensures that the project design follows the recommendation in the report. As the soils report and design features are site specific, the information cannot be available for the General Plan Level programmatic EIR.

The proposed Airport overlay zone and compatibility criteria changes would not, in and of themselves, result in an environmental impact. However, future development in areas under the overlay zone could result in impacts and are discussed here in relation to the general development anticipated under the LUCE Update.

Proposed LUCE Update Development Proposed and Specific Planning 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 potential landslide hazards, 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 landslide hazards.

Proposed Land Use Element Development Special Planning Areas

- General Hospital Site: This area is located along the eastern boundary of the city, near the intersection of Johnson Avenue and Bishop Street and represents an urban interface with the hillsides and designated Open Space to the east. Future residential development in this area, as envisioned under the LUCE Update, would introduce new structures with the potential to result in landslide impacts;

The potential safety impacts from landslide hazards related to implementation of the above development area project would be considered significant; however, new development would conform to the California Building Code (CBC). None of the proposed circulation improvement and/or street network changes would result in impacts related to landslide hazards. Proper engineering, including compliance with the CBC, the City of San Luis Obispo Municipal Code, the City’s hillside development regulation and the policies described below, would minimize the risk to life and property and would reduce impacts to less than significant levels.
Proposed Land Use Element Specific Plan Areas

- **San Luis Ranch Specific Plan Area**
  This area is located in the southwest quarter of the city at the corner of Madonna Road and Dalidio Drive and is characterized primarily by its use as an agricultural property which is primarily undeveloped.

  The site is relatively flat in topography and as shown on the Seismic and Landslide Hazards map in the Figure 4.6-3, potential slope hazards do not occur in this location. Therefore, the LUCE Update Plan buildout within this area would not result in development in landslide hazard areas. Impacts would be less than significant.

- **Madonna on Los Osos Valley Road Specific Plan Area**
  This site is located directly west of the intersection of Los Osos Valley Road and Calle Joaquin and is characterized primarily by its use as an agricultural property which is mainly undeveloped. The site is bordered by relatively moderate slopes associated with the Irish Hills complex.

- **Avila Ranch Specific Plan Area**
  This site is located on the north side of Buckley Road at the far southern edge of the city. There are some existing buildings along the north and west consisting of service and manufacturing uses with the remainder undeveloped. The site is relatively flat in topography and not located adjacent to any hillside slopes.

  As shown on the Seismic and Landslide Hazards map in the Figure 4.6-3, potential slope hazards do not occur in this location. Therefore, buildout in accordance with a future Specific Plan within this area would not result in development in landslide hazard areas. Impacts would be less than significant.

- **South Broad Street Special Planning Area**
  The South Broad Street Area encompasses approximately 86 acres and is bounded by the Broad Street on the west, the Union Pacific Railroad on the east, High Street to the north, and Orcutt Road to the south. The site, which is relatively flat with some gentle change in topography with a general slope to the south, is not adjacent to any hillsides or potential landslide areas.

  As shown on the Seismic and Landslide Hazards map in the Figure 4.6-3, potential slope hazards occur outside of the existing city limits. Therefore, the LUCE Update Plan buildout within the existing City Limits would not result in development in landslide hazard areas. Impacts would be less than significant.

Applicable LUCE Update Policies

The LUCE Update includes policies to prevent or mitigate development in areas with potential for landslide hazards. As discussed under Impact GEO-1, the hillside policies from Chapter 6 of the Land Use Element address development in areas subject to landslide hazards associated with steep slopes. This includes the following:

- 6.2 Hillside Policies [Relevant Portion];
- 6.2.1 The City shall maintain establishes comprehensive standards and policies for hillside development; and
- 6.2.2 Development Limits

Applicable Existing City Policies

As discussed under Impact GEO-1, implementation of the following policy from the General Plan Safety Element will address potential development impacts related to landslide hazards:

- 5.6 Policy S: Avoiding Slope Instability

In addition, the City Municipal Code identifies building requirements to ensure the safety of life and property through the regulation of development under Title 15 Building and Construction, Section 15.04 – Construction and Fire Prevention Regulations. These regulations require detailed soils analysis be prepared to support the proposed building or subdivision activity. As a result of the analysis, larger footings, soil amendment or changes in construction methods and/or materials may be required. While design features and engineering solutions cannot be known until a specific development is
4.0 Environmental Impact Analysis

proposed for a given site, compliance with the California Building Code, the City of San Luis Obispo Municipal Code and policies described in the General Plan will reduce impacts from landslides to less than significant. Individual development will be required to undergo separate environmental review, which may result in specific impacts that require project specific mitigation consistent with these policies.

Mitigation Measures

Steep slopes outside of the existing City Limits present potential on- or off-site landslide hazards. 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. However, with the incorporation of the proposed project and adherence to existing City policies and programs discussed above, additional mitigation is not required.

Significance After Mitigation

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.

4.6.3 Cumulative Impacts

Cumulative buildout of the proposed LUCE Update includes buildout of areas within existing city boundaries, as well as buildout of the identified expansion areas. Overall, development under the LUCE Update would increase development intensity within the city limits, as well as convert adjacent undeveloped areas to a more built environment, thereby altering the fundamental character of these areas. By its nature, the LUCE Update considers cumulative development within the city and potential expansion areas. Thus, cumulative impacts are generally equivalent to project-specific impacts.

Impacts related to geologic and soils resources including seismic events could produce groundshaking, liquefaction, expansive soils, erosive soils, seismic and differential settlement, and landslides have been addressed individually in the paragraphs above. The combination of these impacts reflects the cumulative impacts of the proposed LUCE Update. As noted above, the existing General Plan policies, proposed LUCE Update, project-specific engineering, compliance with the CBC and the City of San Luis Obispo Municipal Code, would protect the health and safety of the San Luis Obispo community. Adherence to these requirements would reduce any impacts from buildout, as well as buildout of Specific Plan and Special Planning Areas identified in the LUCE Update to a less than significant level.
Please see the next page.
This section reviews the City of San Luis Obispo proposed Land Use and Circulation Element Update’s (LUCE Update) potential impacts with respect to greenhouse gas (GHG) emissions and global climate change.

4.7.1. Setting

The purpose of this section is to describe the existing environmental and regulatory setting with respect to global climate change. The global climate change setting is discussed in detail in Section 6.7, Global Climate Change, of the corresponding City of San Luis Obispo General Plan Update Background Report. The Background Report contains a detailed description of existing climate conditions, climate change science, and GHG emissions sources in California and in the city; a summary of applicable regulations with respect to GHG emissions; a description of potential effects of climate change on the city; and the potential for the city to adapt to climate change effects. Key findings from the Background Report section are briefly summarized below (please refer to Section 6.7 of the Background Report for detailed information).

a. Environmental Setting

Climate change is a global problem. Prominent GHG emissions contributing to the greenhouse effect are carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆). Anthropogenic (human-caused) GHG emissions in excess of natural ambient concentrations are responsible for intensifying the greenhouse effect and have led to a trend of unnatural warming of the earth’s climate, known as global climate change or global warming. Global sources of GHG emissions include fossil fuel combustion in both stationary and mobile sources, fugitive emissions from landfills, wastewater treatment, agricultural sources, deforestation, high global warming potential (GWP) gases from industrial and chemical sources, and other activities.

The major sources GHG emissions in the city are transportation-related emissions from cars and trucks, followed by energy consumption in buildings. These local sources constitute the majority of GHG emissions from community-wide activities in the city, and combine with regional, statewide, national, and global GHG emissions that result in the cumulative effect of global warming, which is causing global climate change.

A minimum level of climate change is expected to occur despite local, statewide, or other global efforts to mitigate GHG emissions. The increase in average global temperatures will result in a number of locally-important adverse effects, including sea-level rise, changes to precipitation patterns, and increased frequency of extreme weather events such as heat waves, drought, and severe storms. The city’s population, resources, and economy are vulnerable to these effects.

b. Regulatory Setting

A number of relevant federal, state, regional and local rules and regulations apply to sources of GHG emissions in the city that are described in detail in Section 6.7 of the Background Report. Statewide legislation, rules and regulations that apply to GHG emissions associated with the Project Setting include the Global Warming Solutions Act of 2006 (Assembly Bill [AB] 32), the Sustainable Communities and Climate Protection Act of 2008 (Senate Bill [SB] 375), Advanced Clean Cars Rule, Low Carbon Fuel Standard, Renewable Portfolio Standard, California Building Codes, and recent amendments to the...
California Environmental Quality Act (CEQA) pursuant to SB 97 with respect to analysis of GHG emissions and climate change impacts.

Plans, policies and guidelines have also been adopted at the regional and local level that address GHG emissions and climate change effects in the city. The San Luis Obispo County Air Pollution Control District (APCD) adopted a CEQA Review Handbook, as well as guidance on GHG emission thresholds and supporting evidence, that may be applied by lead agencies within San Luis Obispo County (APCD 2012a, 2012b). The City also adopted a Climate Action Plan (CAP) that includes a GHG emissions inventory, identifies GHG emission reduction targets, and includes specific measures and implementing actions to both reduce community-wide GHG emissions. The CAP also includes measures and actions to help the city build resiliency and adapt to the effects of climate change (City of San Luis Obispo 2012). APCD’s guidance and thresholds of significance, as well as the City’s CAP, are addressed in more detail below in the Impact Analysis contained in Section 4.1.2.

4.7.2. Impact Analysis

a. Methodology and Significance Thresholds

Methodology

This section addresses cumulative impacts related to anthropogenic GHG emissions from future development pursuant to the proposed LUCE Update, and their incremental contribution to global climate change. Impacts from GHG emissions can be divided into construction-related impacts and operational-related impacts. Construction-related impacts from GHG emissions are considered “short-term” because they are shorter-duration activities associated with construction activities likely to occur in conjunction with future development allocated by the plan. Construction-related GHG emissions come from fuel combustion in off-road equipment and on-road vehicles associated with worker trips. Operational-related impacts are associated with ongoing annual releases of GHG emissions into the atmosphere as a result of future operation of both existing and new development from a number of sources, including fuel combustion from mobile sources, direct emissions from natural gas and indirect emissions from generation of electrical power used in residential and commercial buildings, water consumption and wastewater treatment, and emission from decomposing solid waste generated by the community.

Short-term construction-related GHG emissions from on- and off-road vehicles and equipment were estimated using the California Emission Estimator Model (CalEEMod) 2013.2, based on the description of land use changes (dwelling units and commercial square feet) associated with the proposed LUCE Update in Section 2.0 of this EIR. Short-term construction emissions were estimated for worst-case, average annual levels of development assumed to occur under the proposed General Plan, assuming a build out period of the 2015-2035.

Long-term operations-related GHG emissions associated with existing conditions are characterized in the 2005 baseline GHG emissions inventory cited in the City’s CAP. Estimated future emissions under worst-case conditions are included in the GHG emissions forecasts for 2020 and 2035 as part of the CAP.

Significance Thresholds

APCD encourages local governments to adopt a qualified GHG reduction plan that is consistent with AB 32 goals. If a project is consistent with an adopted qualified GHG reduction plan it can be presumed that the project will not have significant GHG emission impacts. This approach is consistent with CEQA Guidelines, Section 15183.5 (APCD 2012a). APCD guidance on GHG thresholds and criteria for use of a qualified GHG reduction plan are further defined in a document entitled “Greenhouse Gas Thresholds and Supporting Evidence” (APCD 2012b).

Because the proposed LUCE Update is not an individual development project, but rather an update to the City’s General Plan, consistency with the City’s adopted CAP is used as a plan-level threshold of significance. The CAP meets the criteria for a qualified GHG reduction plan specified in CEQA Guidelines Section 15183.5, as follows:

- Includes a baseline community-wide GHG emissions inventory for the year 2005, and business-as-usual (no action) forecasts of 2020 and 2035 community-wide GHG emissions
Includes a GHG reduction target of 15 percent below 2005 levels by 2020, consistent with guidance in the AB 32 Scoping Plan (i.e. a level, based on substantial evidence, below which the contribution to greenhouse gas emissions from activities covered by the plan would not be cumulatively considerable)

- Includes an analysis of local and state policies and actions that would reduce GHG emissions within the jurisdiction.
- Quantifies GHG reduction measures demonstrating that, if implemented, the GHG reduction target will be met.
- Contains an implementation and monitoring strategy and timeline
- The City conducted environmental review of the CAP and adopted the CAP in a public process in 2012

### b. Project Impacts

**Impact GCC-1**

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.

### Short-Term Construction-Related GHG Emissions

Construction activities would generate GHG emissions through the use of on- and off-road construction equipment in new development or redevelopment projects. While no project-specific details are known at this time, short-term construction emissions were estimated for worst-case, average annual levels of development assumed to occur under the proposed General Plan through the year 2035. Average annual development assumptions were estimated by dividing the net increase in residential units and commercial building square feet associated with build out of the General Plan by 20 years. Construction emissions were estimated using CalEEMod v2013.2.2 for this annualized average level development within the first full calendar year after anticipated General Plan adoption (2015) in order to obtain a worst-case estimate of average annual construction-related GHG emissions over the 20 year period between 2015 and 2035. Construction-related GHG emissions in 2015 would be approximately 785 metric tons of carbon dioxide equivalent (MT CO₂e). Modeling results are included in the Greenhouse Gas Appendix.

### Long-Term Operational GHG Emissions

In 2009, the City conducted a GHG emissions inventory of annual emissions for the baseline year 2005. The inventory includes estimated community-wide emissions for the transportation, residential and commercial/industrial energy usage (electricity and natural gas), and solid waste sectors. The City’s CAP also included forecasted business-as-usual (BAU) emissions for 2010, 2020 and 2035, consistent with population, housing and employment data for 2010 and projections for 2020 and 2035. Forecasted 2020 and 2035 emissions were estimated based on growth rates provided by the San Luis Obispo Council of Governments (SLOCOG). The CAP BAU forecast supersedes forecasted emissions included in the original inventory, conducted in 2009. The baseline inventory and BAU forecasts are summarized below in Table 4.7-1. Communitywide BAU emissions would increase by approximately 9 percent in 2020 compared to 2005 levels, and would further increase by approximately 21 percent in 2035 compared to 2005 levels.
Table 4.7-1  Baseline and Forecasted GHG Emissions

<table>
<thead>
<tr>
<th>Emissions Sector</th>
<th>2005 Baseline Inventory (MT CO2e/yr)</th>
<th>2020 BAU Forecast (MT CO2e/yr)</th>
<th>2035 BAU Forecast (MT CO2e/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Transportation</td>
<td>132,140</td>
<td>141,350</td>
<td>151,210</td>
</tr>
<tr>
<td>Commercial/Industrial Energy</td>
<td>57,950</td>
<td>67,550</td>
<td>81,940</td>
</tr>
<tr>
<td>Residential Energy</td>
<td>55,370</td>
<td>58,120</td>
<td>61,650</td>
</tr>
<tr>
<td>Waste</td>
<td>18,770</td>
<td>20,730</td>
<td>23,620</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>264,230</strong></td>
<td><strong>287,750</strong></td>
<td><strong>318,420</strong></td>
</tr>
</tbody>
</table>

Source: City of San Luis Obispo, Climate Action Plan, 2012; compiled by Ascent Environmental, Inc.

Notes: BAU = business-as-usual (represents a no-action, worst-case scenario); GHG = greenhouse gas; MT CO2e/yr = metric tons of carbon dioxide equivalent per year.

Projected growth in housing and employment assumed under the proposed LUCE Update is equal to or slightly less than the growth projections used to estimate worst case, “business-as-usual” (BAU) future GHG emissions in the CAP. Therefore, expected long-term operational GHG emissions generated by new development consistent with the proposed LUCE Update would be consistent with forecasted BAU communitywide emissions in the CAP.

The CAP includes a communitywide GHG emissions reduction target of 15 percent below 2005 levels by 2020. This target can also be expressed as a 22 percent reduction below the projected BAU forecast by 2020, which takes into account anticipated growth in population, housing and employment and associated changes in the built environment. The CAP includes specific GHG reduction measures in the CAP that are designed to achieve this target, in combination with state and federal legislative reductions. Table 4.7-2 summarizes expected emissions reductions from CAP GHG reduction measures along with State legislative reductions, and the resulting net emissions expected in 2020 and 2035 as a result of implementation of all CAP measures. As shown, communitywide emissions would be reduced to 16 percent below 2005 levels by the year 2020, exceeding the 15 percent target.

Table 4.7-2  CAP Community-wide GHG Emissions Reductions in 2020 and 2035

<table>
<thead>
<tr>
<th></th>
<th>2020 MT CO2e/yr</th>
<th>2035 MT CO2e/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>Business-As-Usual Forecast Emissions</td>
<td>287,740</td>
<td>318,440</td>
</tr>
<tr>
<td>State Emissions Reductions</td>
<td>-43,110</td>
<td>-67,450</td>
</tr>
<tr>
<td>Adjusted Emissions Forecast with State Reductions</td>
<td>244,630</td>
<td>250,990</td>
</tr>
<tr>
<td>Total Local Emissions Reductions from CAP Measures</td>
<td>-22,610</td>
<td>-45,890</td>
</tr>
<tr>
<td>Adjusted Emissions with State &amp; Local Reductions</td>
<td>222,020</td>
<td>205,100</td>
</tr>
<tr>
<td>Target Emissions Limit (below 2005 levels)</td>
<td>224,600</td>
<td>118,900</td>
</tr>
<tr>
<td>Additional Reductions Needed to Achieve Target</td>
<td>-2,580</td>
<td>86,200</td>
</tr>
<tr>
<td><strong>Percentage Reduction from Baseline</strong></td>
<td><strong>16%</strong></td>
<td><strong>22%</strong></td>
</tr>
</tbody>
</table>

Source: City of San Luis Obispo Climate Action Plan, 2012; adapted and compiled by Ascent Environmental, Inc. 2014.

Notes: CAP = Climate Action Plan, GHG = greenhouse gas; MT CO2e/yr = metric tons of carbon dioxide equivalent per year.

Applicable LUCE Update Policies

The proposed LUCE Update includes new policies and programs, as well as edits to existing policies and programs, that address sustainability and would result in the reduction of GHG emissions. Table 4.7-3 summarizes existing and proposed LUCE Update policies that would support or directly result in the reduction of GHG emissions. Some of the policies also serve as climate adaptation strategies. Policy language edited as part of the LUCE Update is shown using “strikeout and underline” format, while some existing language was retained after critical review. Table 4.7-3 also provides a reference
to corresponding CAP strategies and implementing actions, where applicable, to demonstrate consistency with the adopted CAP.

### Table 4.7-3 Consistency of Proposed LUCE Update Policies and Program with Climate Action Plan Measures and Actions

<table>
<thead>
<tr>
<th>General Plan Policy or Program</th>
<th>Consistent CAP Strategies or Actions</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>LAND USE ELEMENT</strong></td>
<td></td>
</tr>
<tr>
<td><strong>1.0.1 Growth Management Objectives</strong></td>
<td>TLU 8: Reduce the Need for Commuting</td>
</tr>
<tr>
<td>The City shall manage its growth so that:</td>
<td>Increase local housing options for workers in the community that include variety in location, type, size, tenure and style of dwellings.</td>
</tr>
<tr>
<td>A. The natural environment and air quality will be protected.</td>
<td></td>
</tr>
<tr>
<td>B. The relatively high level of services enjoyed by City residents is maintained or enhanced.</td>
<td></td>
</tr>
<tr>
<td>C. The demand for municipal services does not outpace their availability.</td>
<td></td>
</tr>
<tr>
<td>D. New residents can be assimilated without disrupting the community's social fabric, safety, or established neighborhoods.</td>
<td></td>
</tr>
<tr>
<td>E. Residents' opportunities for direct participation in City government and their sense of community can continue.</td>
<td></td>
</tr>
<tr>
<td><strong>1.4 Jobs/Housing Relationship</strong></td>
<td>TLU 8: Reduce the Need for Commuting</td>
</tr>
<tr>
<td>The gap between housing demand (due to more jobs and college enrollment) and supply should not increase.</td>
<td>Increase local housing options for workers in the community that include variety in location, type, size, tenure and style of dwellings.</td>
</tr>
<tr>
<td><strong>1.7.1 Open Space Protection</strong></td>
<td>PKS 2: Parks &amp; Open Space Development</td>
</tr>
<tr>
<td>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.</td>
<td>Continue to develop and acquire parks and open space resources.</td>
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<td></td>
</tr>
<tr>
<td>General Plan Policy or Program</td>
<td>Consistent CAP Strategies or Actions</td>
</tr>
<tr>
<td>-------------------------------</td>
<td>-------------------------------------</td>
</tr>
<tr>
<td><strong>1.7.6  Wildlife Habitat</strong></td>
<td><strong>PKS 2: Parks &amp; Open Space Development</strong>&lt;br&gt;Continue to develop and acquire parks and open space resources.&lt;br&gt;• PKS 2.1 Continue to negotiate easements and land donations for conservation.&lt;br&gt;• PKS 2.2 Continue to develop and implement conservation plans for large City open space areas.&lt;br&gt;• PKS 2.4 Expand donation programs for open space preservation and maintenance.&lt;br&gt;• PKS 2.5 Partner with other local organizations committed to open space preservation and parkland development.&lt;br&gt;• PKS 5.2 Partner with regional organizations to create volunteer opportunities for trail work, habitat restoration and open space maintenance.</td>
</tr>
<tr>
<td>The City shall ensure that continuous wildlife habitat – including corridors free of human disruption shall be preserved, and, where necessary, created.</td>
<td><strong>PKS Adaptation 1: Vegetation Management</strong>&lt;br&gt;Control invasive species, erosion and sediment, re-vegetate open space with native plants and trees, and restore natural processes.</td>
</tr>
<tr>
<td><strong>1.7.7  Trees Outside City Limits</strong></td>
<td>PKS 1: Enrich the Urban Forest&lt;br&gt;Increase the number of native trees along City streets, parks, and open spaces, with sensitivity to potential locations for solar energy opportunities.</td>
</tr>
<tr>
<td>The City shall preserve significant trees, particularly native species, outside its limits and in the greenbelt shall be preserved on lands owned or leased by the City or for which the City has an easement. For other areas in the greenbelt, the City will work with the County, Cal Poly, and other public agencies to protect these trees.</td>
<td><strong>PKS 2: Parks &amp; Open Space Development</strong>&lt;br&gt;Continue to develop and acquire parks and open space resources.&lt;br&gt;• PKS 2.1 Continue to negotiate easements and land donations for conservation.&lt;br&gt;• PKS 2.2 Continue to develop and implement conservation plans for large City open space areas.&lt;br&gt;• PKS 2.3 Use conservation easements in a coordinated fashion to create trails.&lt;br&gt;• PKS 2.4 Expand donation programs for open space preservation and maintenance.&lt;br&gt;• PKS 2.5 Partner with other local organizations committed to open space preservation and parkland development.</td>
</tr>
<tr>
<td><strong>1.8.1  Agricultural Protection</strong></td>
<td><strong>PKS 2: Parks &amp; Open Space Development</strong>&lt;br&gt;Continue to develop and acquire parks and open space resources.&lt;br&gt;• PKS 2.1 Continue to negotiate easements and land donations for conservation.&lt;br&gt;• PKS 2.2 Continue to develop and implement conservation plans for large City open space areas.&lt;br&gt;• PKS 2.3 Use conservation easements in a coordinated fashion to create trails.&lt;br&gt;• PKS 2.4 Expand donation programs for open space preservation and maintenance.&lt;br&gt;• PKS 2.5 Partner with other local organizations committed to open space preservation and parkland development.</td>
</tr>
<tr>
<td>It is the City’s policy to encourage shall support preservation of economically viable agricultural operations and land within the urban reserve and city limits. The City should provide for the continuation of farming through steps such as provision of appropriate general plan designations and zoning.</td>
<td><strong>PKS 2: Parks &amp; Open Space Development</strong>&lt;br&gt;Continue to develop and acquire parks and open space resources.&lt;br&gt;• PKS 2.1 Continue to negotiate easements and land donations for conservation.&lt;br&gt;• PKS 2.2 Continue to develop and implement conservation plans for large City open space areas.&lt;br&gt;• PKS 2.3 Use conservation easements in a coordinated fashion to create trails.&lt;br&gt;• PKS 2.4 Expand donation programs for open space preservation and maintenance.&lt;br&gt;• PKS 2.5 Partner with other local organizations committed to open space preservation and parkland development.</td>
</tr>
<tr>
<td><strong>1.8.2  Prime Agricultural Land</strong></td>
<td><strong>PKS 2: Parks &amp; Open Space Development</strong>&lt;br&gt;Continue to develop and acquire parks and open space resources.&lt;br&gt;• PKS 2.1 Continue to negotiate easements and land donations for conservation.&lt;br&gt;• PKS 2.2 Continue to develop and implement conservation plans for large City open space areas.&lt;br&gt;• PKS 2.3 Use conservation easements in a coordinated fashion to create trails.&lt;br&gt;• PKS 2.4 Expand donation programs for open space preservation and maintenance.&lt;br&gt;• PKS 2.5 Partner with other local organizations committed to open space preservation and parkland development.</td>
</tr>
<tr>
<td>The City may allow development on prime agricultural land may be permitted, if the development contributes to the protection of agricultural land in the urban reserve or greenbelt by one or more of the following methods, or an equally effective method: acting as a receiver site for transfer of development credit from prime agricultural land of equal quantity; securing for the City or for a suitable land</td>
<td><strong>PKS 2: Parks &amp; Open Space Development</strong>&lt;br&gt;Continue to develop and acquire parks and open space resources.&lt;br&gt;• PKS 2.1 Continue to negotiate easements and land donations for conservation.&lt;br&gt;• PKS 2.2 Continue to develop and implement conservation plans for large City open space areas.&lt;br&gt;• PKS 2.3 Use conservation easements in a coordinated fashion to create trails.&lt;br&gt;• PKS 2.4 Expand donation programs for open space preservation and maintenance.&lt;br&gt;• PKS 2.5 Partner with other local organizations committed to open space preservation and parkland development.</td>
</tr>
</tbody>
</table>
### General Plan Policy or Program

| Conservation organization open space or agricultural easements or fee ownership with deed restrictions; helping to directly fund the acquisition of fee ownership or open space easements by the City or a suitable land conservation organization. Development of small parcels which are essentially surrounded by urbanization need not contribute to agricultural land protection. |

#### 1.9.1 Basic for Variation Parcel Sizes

- In the greenbelt, the City may allow, and the City shall encourage the County to allow, smaller parcel sizes and more dwellings only when:
  1. All new dwellings will be clustered contiguously in accordance with Table 1;
  2. At least 90% of the site area outside the cluster is permanently protected as open space;
  3. Agricultural easements are placed on prime agricultural lands outside the cluster.

#### 1.9.2 Means of Protection

- The City shall require that open space is to be preserved either by dedication of permanent easements or transfer of fee ownership to the City, the County, or a responsible, nonprofit conservation organization.

#### 2.1.4 Neighborhood Connections

- The City shall provide all areas should have with a pattern of streets, pedestrian network, and sidewalk bicycle facilities pattern that promotes neighborhood and community cohesiveness. There should be continuous sidewalks or paths of adequate width, connecting neighborhoods with each other and with public and commercial services and public open space to provide continuous pedestrian paths throughout the City. Connectivity to nearby community facilities (such as parks and schools), open space, and supporting commercial areas shall also be enhanced, but shall not be done in a method that would increase cut-through traffic. (See also the Circulation Element.)

#### 2.1.6 Neighborhood Amenities

- The City shall promote livability and safety for all residents. Characteristics of quality neighborhoods vary from neighborhood to neighborhood, but often include one or more of the following characteristics:
  - A mix of housing type styles, density, and affordability.
  - Design and circulation features that create and maintain a pedestrian scale.
  - Nearby services and facilities including schools, parks, retail (e.g., grocery store, drug store), restaurants and cafes, and community centers or other public facilities.
  - A tree canopy and well-maintained landscaping.
  - A sense of personal safety (e.g., low crime rate, short...|

### Consistent CAP Strategies or Actions

<p>| Fashion to create trails. |
| PKS 2: Parks &amp; Open Space Development |
| Continue to develop and acquire parks and open space resources. |
| PKS 2: Parks &amp; Open Space Development |
| TLU 5: Land Use Diversity and Density |
| Encourage compact urban form and mixed-use developments. |
| TLU 5: Land Use Diversity and Density |
| TLU 8: Reduce the Need for Commuting |
| Increase local housing options for workers in the community that include variety in location, type, size, tenure and style of dwellings. |</p>
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<tbody>
<tr>
<td>2.2.1  Mixed Uses &amp;and Convenience</td>
<td>TLU 5: Land Use Diversity and Density</td>
</tr>
<tr>
<td>The City shall promote mixed use projects, where appropriate and compatible with existing and planned development on the site and with adjacent and nearby properties. The City shall support the location of mixed use projects and community and neighborhood commercial centers near major activity nodes and transportation corridors / transit opportunities where appropriate. Where housing can be compatible with offices or other businesses, mixed use projects should be encouraged.</td>
<td>Encourage compact urban form and mixed-use developments.</td>
</tr>
<tr>
<td>2.2.6  Housing and Businesses</td>
<td>TLU 5: Land Use Diversity and Density</td>
</tr>
<tr>
<td>The City shall encourage mixed use projects, where appropriate and compatible with existing and planned development on the site and with adjacent and nearby properties. The City shall support the location of mixed use projects and community and neighborhood commercial centers near major activity nodes and transportation corridors / transit opportunities where appropriate. Where housing can be compatible with offices or other businesses, mixed use projects should be encouraged.</td>
<td>Encourage compact urban form and mixed-use developments.</td>
</tr>
<tr>
<td>2.2.7  Natural Features</td>
<td>PKS 2: Parks &amp; Open Space Development</td>
</tr>
<tr>
<td>The City shall require residential developments should preserve and incorporate as amenities natural site features, such as land forms, views, creeks, wetlands, wildlife habitats, wildlife corridors, and plants.</td>
<td>Continue to develop and acquire parks and open space resources.</td>
</tr>
<tr>
<td>2.2.9  Compatible Development</td>
<td>RE 2: Renewable Energy Implementation</td>
</tr>
<tr>
<td>The City shall require that new housing built within an</td>
<td>Incentivize renewable energy generation in new and</td>
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</table>
existing neighborhood should be sited and designed to be compatible with the scale and character of the neighborhood. All multifamily development and large group-living facilities should be compatible with any nearby, lower density development. Compatibility shall be evaluated using the following criteria:

### Architectural Character

New buildings should respect existing buildings which contribute to neighborhood historical or architectural character, in terms of size, spacing, and variety.

#### A. Front Setback Patterns

New development shall match the typical range of setbacks used in areas adjacent to the project.

#### B. Landscaping

New development shall repeat or enhance the landscaping provided in parkway areas (if any exist) along street frontages.

#### C. Rhythm of Development

New development shall reflect the rhythm of existing development in the area including features such as setbacks and façade widths along the front setback. Larger structures, such as multi-family (as allowed by the General Plan land use designation for the site) should replicate the spacing of structural components along the street frontage.

#### D. Street Orientation

New development shall match the general orientation of existing residential structures in the adjacent area and shall provide an inviting façade facing public streets.

#### E. Architecture

Architectural compatibility will be assessed based on a combination of factors, including height, scale, mass, form and architectural style. Desired outcome is a smooth transition between existing and proposed development, supporting a quality neighborhood.

#### F. Privacy and Solar Access

New buildings will respect the privacy and solar access of neighboring buildings and outdoor areas, particularly where multistory buildings or additions may overlook backyards of adjacent dwellings. (See also the City’s Conservation and Open Space Element.)

#### G. Preservation of Natural, Historic and Cultural Features

- **TLU 8: Reduce the Need for Commuting**
  Increase local housing options for workers in the community that include variety in location, type, size, tenure and style of dwellings.

- **RE 2.2 Revise City policies and regulations as needed to eliminate barriers to the use of renewable energy, and implement General Plan programs that require solar power for certain residential projects (COSE 4.6.17).**
<table>
<thead>
<tr>
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<tr>
<td><strong>New development shall:</strong></td>
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<tr>
<td>a. Respect historic context</td>
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<tr>
<td>b. Maintain mature trees on-site to the maximum extent feasible</td>
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<tr>
<td>c. Protect stream corridors and natural drainages</td>
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<tr>
<td><strong>H. Housing Diversity</strong></td>
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<tr>
<td>A mix of housing types, and a range of density within a neighborhood is generally desirable (see also Policy 2.1.6).</td>
<td></td>
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<tr>
<td><strong>I. Parking</strong></td>
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<tr>
<td>New development:</td>
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<tr>
<td>a. Outside of the Downtown In-lieu Parking Fee Area, new development will be required to provide adequate off-street parking to match the intended use.</td>
<td></td>
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<tr>
<td>a-b. For multi-family, parking shall be sited and designed to minimize the visual impact from the public street.</td>
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</table>

**2.3.2 Density Bonuses**

The City may shall approve a density bonus for a projects that will be:

A. Be Provide a receiving site, within expansion areas or the downtown commercial core only, for development credit transferred to protect open space;
B. Provide for the minimum percentage of Include affordable housing dwellings for elderly, seniors or lower income households or affordable to the income groups specified in consistent with the requirements of State Law.

**2.6 Reduced Automobile Dependence in Downtown**

The City shall encourage the development of Downtown housing that minimizes the need for automobile use and minimizes the storage of vehicles in surrounding neighborhoods.

**3.2.1 New or Expanded Areas of Neighborhood Commercial Use**

The City shall provide for new or expanded areas of neighborhood commercial uses that:

A. Be Are created within, or extended into, nonresidential areas adjacent to residential neighborhoods;
B. Provide uses to serve nearby residents, not the whole city;
C. Have access from arterial streets, and not increase traffic on residential streets;
D. Have safe and pleasant pedestrian access from the
surrounding service area, as well as good internal circulation;

E. Be designed to be pedestrian-oriented, and architecturally compatible with the adjacent neighborhoods being served. Pedestrian-oriented features of project design should include:
   i. Off-street parking areas located to the side or rear of buildings rather than between buildings and the street;
   ii. Landscaped areas with public seating; and
   iii. Indoor or outdoor space for public use, designed to provide a focus for some neighborhood activities.

3.2.2 Stores in Residential Areas

The City shall allow for the continuation of small, individual stores within established residential areas may be retained when if they are compatible with surrounding uses. Other isolated commercial uses which are not compatible with residential surroundings eventually should be replaced with compatible uses.

4.0.1 Existing and New Dwellings

Downtown residential uses contribute to the character of the area, allow a 24-hour presence which enhances security and help the balance between jobs and housing in the community. The City shall use the following when evaluating development in the Downtown area:

- Existing residential uses within and around the commercial core should be protected, and new ones should be developed.
- Dwellings should be provided for a variety of households-including singles, couples, and groups.
- Dwellings should be interspersed with commercial uses.
- All new, large commercial projects should include residential uses.
- Commercial core properties may serve as receiver sites for transfer of development credits, thereby having higher residential densities than otherwise allowed (See Policies 6.2.5 and 6.2.6).

4.0.4 Walking Environment

The City shall plan and manage Downtown to include safe, exciting, interesting places for walking and pleasant places for sitting. To invite exploration: To this end:

- Mid-block walkways, courtyards, and interior malls should be well lit and integrated with new and remodeled buildings, while preserving continuous building faces on most blocks.
- Downtown streets should provide adequate space for pedestrians.

### Consistent CAP Strategies or Actions

**TLU 5: Land Use Diversity and Density**

Encourage compact urban form and mixed-use developments.

- **TLU 5: Land Use Diversity and Density**
  - Encourage compact urban form and mixed-use developments.
  - TLU 5.2 Promote infill by amending the General Plan and Zoning Regulations to increase residential densities in suitable zones.
  - TLU 5.4 Evaluate allowing mixed-use projects in the High-density residential zone in the SLO2035 General Plan update.

**TLU 8: Reduce the Need for Commuting**

Increase local housing options for workers in the community that include variety in location, type, size, tenure and style of dwellings.

- TLU 8.2 Support infill housing projects that implement General Plan policies, especially BMR housing close to job opportunities.

**TLU 4: Complete Streets**

Modify General Plan policies in the SLO2035 update to support a balanced, multimodal transportation network.

- TLU 4.2 Develop and adopt a Downtown Pedestrian Plan.
There should be a nearly continuous tree canopy along sidewalks, and planters should provide additional foliage and flowers near public gathering areas.

To maintain the downtown appeal for pedestrians, new buildings should not obstruct sunlight from reaching sidewalks on the northwest side of Marsh Street, Higuera Street, and Monterey Street at noon on the winter solstice.

Public Art should be placed along pedestrian paths.

Traffic calming and pedestrian safety should be enhanced, where appropriate, through such features as road tables, pavement changes, bulbouts and scramble intersection signals.

Landscaping should mitigate harsh micro-climates.

The City shall protect San Luis Obispo Creek should be protected and restored, provided this can be done in a manner that minimizes human impact on creek life. Walking paths along the creek in the downtown core should be provided and extended as links in an urban trail system, provided this will not further degrade wildlife habitat value of the riparian ecosystem. As properties that have encroaching buildings are redeveloped, the City should enforce a reasonable building setback from the riparian zone. (See also Resource Protection Sections in the Conservation and Open Space Element and Safety Element) Opportunities to open covered sections of the creek should be pursued.

Once resource areas worthy of protection are identified, the City shall seek to protect resource areas deemed worthy of permanent protection by fee acquisition, them by easement, or other permanent means.

PKS 2: Parks & Open Space Development
Continue to develop and acquire parks and open space resources.
- PKS 2.3 Use conservation easements in a coordinated fashion to create trails.
### 4.0 Environmental Impact Analysis

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| **6.1.2 Open Space Uses**     | **PKS 2: Parks & Open Space Development**  
Lands designated Open Space should be used for purposes which do not need urban services, major structures, or extensive landform changes. Such uses include: watershed protection; wildlife and native plant habitat; grazing, cultivated crops; and passive recreation. **The City shall require that buildings, lighting, paving, use of vehicles, and alterations to the landforms and native or traditional cultural landscapes on open space lands should be minimized**, so rural character and resources are maintained. Buildings and paved surfaces, such as parking or roads, shall not exceed the following: where a parcel smaller than ten acres already exists, five percent of the site area; on a parcel of ten acres or more, three percent. (As explained in the Conservation and Open Space Element, the characteristics of an open space area may result in it being suitable for some open space uses, but not the full range.) **Parcels within Open Space areas should not be further subdivided.** |
| **6.2.1 Development Limits**  | **PKS 2: Parks & Open Space Development**  
The City shall establish and maintain clear development limit lines for hillside planning areas should have carefully chosen development limit lines, and special design standards for the hillside areas which can be developed. The location of the development limit and the standards should cause development to avoid encroachment into sensitive habitats or unique resources as defined in the Conservation and Open Space Element, and public health and safety problems related to utility service, access, wildland fire hazard, erosion, flooding, and landslides and other geologic hazards. Also, the development limit line and the standards should help protect the City’s scenic setting. (Locations of hillside planning areas are shown in Figure 6. **More precise locations of the development limit line and the urban reserve line are shown on large-scale aerial photographs on file at the Community Development Department; these are part of the Land Use Element.**)
| **6.2.3 Parcels Crossing the Limit Lines** | **PKS 2: Parks & Open Space Development**  
The City shall require that **Before development occurs on any parcel which crosses** the urban reserve or development limit lines, the part outside the lines shall be protected as permanent open space. |
| **6.4.1 Creek and Wetlands Management Objectives** | **PKS 2: Parks & Open Space Development**  
The City **shall manage** its lake, creeks, wetlands, floodplains, and associated wetlands to achieve the multiple objectives of: **A. Maintaining and restoring natural conditions and fish and wildlife habitat;**
B. Preventing loss of life and minimizing property damage from flooding;
C. Providing recreational opportunities which are compatible with fish and wildlife habitat, flood protection, and use of adjacent private properties.
D. Recognizing and distinguishing between those sections of creeks and Laguna Lake which are in previously urbanized areas, such as the Downtown core, and sections which are in largely natural areas. Those sections already heavily impacted by urban development and activity may be appropriate for multiple use whereas creeks and lakeshore in a more natural state shall be managed for maximized ecological value.

### 6.4.5 Porous Paving-Runoff Reduction and Groundwater Recharge

The City encourages the use of porous paving methods to facilitate rainwater percolation. Parking lots and paved roof areas and outdoor hardscaped areas shall, where practical, use one or more of the following measures to reduce surface water runoff and aid in groundwater recharge: porous paving; ample landscaped areas which receive surface drainage and which are maintained to facilitate percolation; drainage detention basins with soils that facilitate percolation.

### 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.

### 9.3.3 Sustainability Coordination

The City shall review SLOCOG’s Regional Transportation Plan, including the Sustainable Communities Strategy, as it prepares and reviews updates to the General Plan. General Plan Amendments, specific plans, changes in zoning regulations, capital improvement plans and other infrastructure plans to determine consistency and eligibility for State transportation funding.

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### TLU 1: Transit Services

Continue to maintain and expand transit services utilizing best practices in planning and management.

### TLU 3: Bike Travel

Increase the percentage of non-recreational trips that are made by bicycle.

### TLU 5: Land Use Diversity and Density

Encourage compact urban form and mixed-use developments.

### TLU 8: Reduce the Need for Commuting

Increase local housing options for workers in the community that include variety in location, type, size, tenure and style of dwellings.
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|                               | **TLU 5: Land Use Diversity and Density**  
Encourage compact urban form and mixed-use developments. |
|                               | **TLU 8: Reduce the Need for Commuting**  
Increase local housing options for workers in the community that include variety in location, type, size, tenure and style of dwellings. |
| **9.3.4 Climate Action Plan** | See targets and all measures and actions in the City’s Climate Action Plan |
| The City shall maintain and implement its Climate Action Plan to reduce community and municipal GHG emissions consistent with State laws and objectives. |
| **9.3.5 Urban Heat Effects**  | **Existing Action:**  
Application requirements for large development projects to complete green building and low impact development checklists. |
| The City shall reduce heat effects of urban development by requiring new development to incorporate, as appropriate, features such as reduced hardscape, light or heat reflective roofing, and shade trees. |
| **9.3.6 Natural Areas and Green Space** | **PKS 2: Parks & Open Space Development**  
Continue to develop and acquire parks and open space resources. |
| The City shall continue to maintain and expand natural areas in and around the city to foster carbon sequestration while providing more open space for residents. |
| **9.3.7 Sustainable Design** | **BLD 1: Efficiency Improvements to Existing Buildings**  
Implement local programs, and collaborate with the County and State, to improve energy efficiency in older building stock. |
| The City shall promote and, where appropriate, require sustainable building practices that consume less energy, water and other resources, facilitate natural ventilation, use daylight effectively, and are healthy, safe, comfortable, and durable. Projects shall include, unless deemed infeasible by the City, the following sustainable design features. |
| **A. Energy-Efficient Structure** | **BLD 2: New Construction Energy Conservation**  
Encourage and incentivize new development to exceed minimum Cal Green requirements.  
- BLD 2.1 Expand incentive program for projects that exceed Title 24 energy efficiency standards.  
- BLD 2.2 Require new development to install energy-efficient appliances.  
- BLD 2.3 Amend design guidelines and other |
| Utilize building standards and materials that achieve or surpass best practices for energy efficiency. |
| **B. Energy-Efficient Appliances** |  
Utilize appliances, including air conditioning and heating systems that achieve high energy efficiency. |
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<tr>
<td>Incorporation of alternative energy systems (e.g. passive and/or active solar, heat pumps) is encouraged.</td>
<td>documents to promote low impact development strategies such as cool roofs and cool paving surfaces.</td>
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<tr>
<td><strong>C. Natural Ventilation</strong></td>
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<tr>
<td>Optimize potential for cooling through natural ventilation.</td>
<td></td>
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<tr>
<td><strong>D. Plumbing</strong></td>
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<tr>
<td>Utilize plumbing fixtures that conserve or reuse water such as low flow faucets or grey water systems.</td>
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<tr>
<td><strong>E. Efficient Landscaping</strong></td>
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<tr>
<td>Include landscaping that reduces water use through use of drought-tolerant / native plant species, high-efficiency irrigation (drip irrigation), and reduction or elimination of the use of turf. Collection and use of site runoff and rainwater harvesting in landscape irrigation is encouraged.</td>
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<tr>
<td><strong>A.F. Solar Orientation</strong></td>
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<tr>
<td>Optimize solar orientation of structures to the extent possible.</td>
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<tr>
<td><strong>B.G. Privacy and Solar Access</strong></td>
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<tr>
<td>New buildings outside of the downtown will respect the privacy and solar access of neighboring buildings and outdoor areas, particularly where multistory buildings or additions may overlook backyards of adjacent dwellings.</td>
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**WTR 1: Water Conservation: Existing Development**
Implement Water Efficient Landscape Standards (MC 17.87) when landscape projects trigger building permit review.
- WTR 1.1 Require landscape projects that trigger building permit review to incorporate native and drought tolerant plant materials and minimize irrigated turf areas.
- WTR 1.2 Require landscape projects that trigger building permit review to incorporate irrigation system designs that avoid runoff, low-head drainage, and overspray.
- WTR 1.3 Encourage the use of recycled water, greywater or rainwater-harvesting systems.

**WTR 2: Water Conservation: New Development**
Implement CALGreen standards, Water Reuse Master Plan, and Water Efficient Landscape Standards to reduce potable water use in new development.
- WTR 2.1 Review new development projects for consistency with CALGreen water efficiency standards.
- WTR 2.2 Expand recycled water infrastructure to encourage use of greywater in new construction and landscape projects.
- WTR 2.3 Require use of native and non-invasive drought tolerant plant materials combined with conservative use of water and landscape designs that prevent run-off.

**Existing Actions**
The City continues to support renewable energy through policies in the Conservation and Open Space Element (COSE) of the General Plan, including:
- Solar access standards for new development that ensure new and existing buildings maintain adequate solar access for future solar installations.
- Solar power requirements for new single-family residential projects of 20 or more dwelling units.
- Photovoltaic solar collector requirements for common-use facilities in multi-family residential developments with 20 or more units.
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| **New Policy: Renew the Urban Forest**  
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. |  
**PKS 1: Enrich the Urban Forest**  
Increase the number of native trees along City streets, parks, and open spaces, with sensitivity to potential locations for solar energy opportunities. |
| **New Program: Urban Forest**  
Update master tree plan and develop recommendations to renew and maintain the urban forest and plant more trees. |  
**PKS 1: Enrich the Urban Forest**  
Increase the number of native trees along City streets, parks, and open spaces, with sensitivity to potential locations for solar energy opportunities.  
**Program Climate Action Plan**  
The City shall review and regularly update the Climate Action Plan and shall annually report to the City Council on implementation of the Climate Action Plan.  
**Program Building Code Update**  
The City shall regularly review and update its building codes and ordinances to identify revisions that promote energy efficient building design and construction practices.  
**Program Incentive Program**  
The City shall consider the feasibility of providing incentives for new and renovated projects that incorporate sustainable design features. |
| **Program LEED Certifiable**  
The City shall design all new City facilities to meet the requirements specified for certification as LEED Silver construction or equivalent rating system. |  
**Program Renewable Energy Financing**  
The City shall promote and pursue a wide range of renewable energy financing options including a renewable energy fund or loan program.  
**Program Renewable Energy Financing**  
The City shall promote and pursue a wide range of renewable energy financing options including a renewable energy fund or loan program.  
**BLD 1: Efficiency Improvements to Existing Buildings**  
Implement local programs, and collaborate with the County and State, to improve energy efficiency in older building stock.  
**BLD 2: New Construction Energy Conservation**  
Encourage and incentivize new development to exceed minimum Cal Green requirements.  
**RE 1: Renewable Energy Financing**  
Promote a wide range of renewable energy financing options including a renewable energy fund or loan program.  
**RE 1.1 Support efforts to implement a revolving low-interest loan program or renewable energy fund.**  
**RE 1.2 Work with the County to build a collaborative network to promote renewable funding and financing.**  
**RE 1.3 Work with the County and regional energy providers to evaluate a “feed-in tariff” program that pays property owners generating renewable energy based on the amount of energy generated.** |
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<td><strong>Program Renewable Energy Choice</strong></td>
<td><strong>RE 2: Renewable Energy Implementation</strong></td>
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<tr>
<td>The City shall evaluate the feasibility of a regional Community Choice Aggregation program to procure electricity from renewable resources.</td>
<td>Incentivize renewable energy generation in new and existing developments.</td>
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<td></td>
<td>• RE 2.3 Evaluate the feasibility of a regional Community Choice Aggregation program to procure electricity from renewable resources.</td>
</tr>
<tr>
<td><strong>10.3.1  Neighborhood Access</strong></td>
<td><strong>TLU 5: Land Use Diversity and Density</strong></td>
</tr>
<tr>
<td>All residences should be within close proximity to food outlets including grocery stores, farmers markets, and community gardens.</td>
<td>Encourage compact urban form and mixed-use developments.</td>
</tr>
<tr>
<td></td>
<td><strong>PKS 4: Foster Local Food Production</strong></td>
</tr>
<tr>
<td></td>
<td>Foster local food production by increasing the availability and sustainability of community gardens and agriculture.</td>
</tr>
<tr>
<td></td>
<td>• PKS 4.1 Continue to identify suitable locations for community gardens on public and private property.</td>
</tr>
<tr>
<td><strong>10.3.2  Local Food Systems</strong></td>
<td><strong>PKS 4: Foster Local Food Production</strong></td>
</tr>
<tr>
<td>The City shall support sustainable local food systems, including farmer’s markets, community supported agriculture, urban agriculture, and healthy food retailers.</td>
<td>Foster local food production by increasing the availability and sustainability of community gardens and agriculture.</td>
</tr>
<tr>
<td></td>
<td>• PKS 4.1 Continue to identify suitable locations for community gardens on public and private property.</td>
</tr>
<tr>
<td></td>
<td>• PKS 4.2 Implement the Calle Joaquin Agricultural Reserve Master Plan.</td>
</tr>
<tr>
<td><strong>10.3.3  Provide for Community Gardens</strong></td>
<td><strong>PKS 4: Foster Local Food Production</strong></td>
</tr>
<tr>
<td>The City shall continue to support the development of community gardens.</td>
<td>Foster local food production by increasing the availability and sustainability of community gardens and agriculture.</td>
</tr>
<tr>
<td></td>
<td>• PKS 4.1 Continue to identify suitable locations for community gardens on public and private property.</td>
</tr>
<tr>
<td><strong>10.3.4  Encouraging Walkability</strong></td>
<td><strong>TLU 1: Transit Services</strong></td>
</tr>
<tr>
<td>The City shall encourage projects which provide for and enhance active and environmentally sustainable modes of transportation, such as pedestrian movement, bicycle access, and transit services.</td>
<td>Continue to maintain and expand transit services utilizing best practices in planning and management.</td>
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<tr>
<td></td>
<td><strong>TLU 3: Bike Travel</strong></td>
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<tr>
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<td>Increase the percentage of non-recreational trips that are made by bicycle.</td>
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<td><strong>TLU 4: Complete Streets</strong></td>
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<td>Modify General Plan policies in the SLO2035 update to support a balanced, multimodal transportation network.</td>
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<tr>
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<td>• TLU 4.1 Require new and redeveloped street designs to address the needs of all users – motorists, pedestrians, bicyclists, children, persons with disabilities, seniors and users of public transit – where appropriate.</td>
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<td></td>
<td>• TLU 4.2 Develop and adopt a Downtown Pedestrian Plan.</td>
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<td>• TLU 4.3 Collaborate with SLO Regional Rideshare to expand Safe Routes to School programs, events, and projects.</td>
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<td>• TLU 4.4 Research traffic congestion management.</td>
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### General Plan Policy or Program

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<td><strong>Program</strong></td>
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</table>
| The City shall regularly **review and update master plans for City parks to designate areas for community gardens where appropriate.** | **TLU 5: Land Use Diversity and Density**<br>Encourage compact urban form and mixed-use developments.  
- TLU 5.1 Improve connectivity between neighborhoods and services based on opportunities identified in the SLO2035 General Plan update.  
- TLU 5.2 Promote infill by amending the General Plan and Zoning Regulations to increase residential densities in suitable zones. |
| **Program** | | |
| The City shall update the Community Design Guidelines to encourage the inclusion of communal gardens within multi-family residential developments with 10 or more units. | **PKS 4: Foster Local Food Production**<br>Foster local food production by increasing the availability and sustainability of community gardens and agriculture.  
- PKS 4.1 Continue to identify suitable locations for community gardens on public and private property. |
| **CIRCULATION ELEMENT** | | |
| **2.0.1 Multi-level Programs** | **TLU 1: Transit Services**<br>Continue to maintain and expand transit services utilizing best practices in planning and management.  
**TLU 3: Bike Travel**<br>Increase the percentage of non-recreational trips that are made by bicycle.  
**TLU 4: Complete Streets**<br>Modify General Plan policies in the SLO2035 update to support a balanced, multimodal transportation network.  
**TLU 5: Land Use Diversity and Density**<br>Encourage compact urban form and mixed-use developments.  
**TLU 6: Parking Management**<br>Motivate Downtown visitors to park once and walk or ride to multiple destinations, or use transit to get to and from downtown.  
**TLU 7: Shared Parking**<br>Reduce VMT and associated GHG emissions by further reducing parking requirements for land uses that share the same parking lot.  
**TLU 9: Public Outreach and Education**<br>Increase community awareness of transit options and established pedestrian and bicycle infrastructure. Inform residents and businesses about available incentives for |
| The City shall support county-wide and community-based programs in order to reduce the number of vehicle trips and parking demand. | | |
## General Plan Policy or Program

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<td>commuting via carpool, transit and bicycle.</td>
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<tr>
<td><strong>GO 9: Employee Commute</strong></td>
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<tr>
<td>Continue to reduce single-occupant employee commuting through trip reduction incentives.</td>
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### 2.0.2 Flexible Work Schedules

The City shall support flex time programs and alternative work schedules where they reduce peak hour traffic levels.

**GO 9: Employee Commute**
Continue to reduce single-occupant employee commuting through trip reduction incentives.

### 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.

**TLU: Public Outreach and Education**
Increase community awareness of transit options and established pedestrian and bicycle infrastructure. Inform residents and businesses about available incentives for commuting via carpool, transit and bicycle.

**GO 9: Employee Commute**
Continue to reduce single-occupant employee commuting through trip reduction incentives.

### 2.1.1 Agency Cooperation

The City will participate and cooperate in coordination with county agencies, the County Air Pollution Control District's, and other agencies. The City shall support efforts in establishing county-wide trip reduction programs.

**TLU: Public Outreach and Education**
Increase community awareness of transit options and established pedestrian and bicycle infrastructure. Inform residents and businesses about available incentives for commuting via carpool, transit and bicycle.

**GO 9: Employee Commute**
Continue to reduce single-occupant employee commuting through trip reduction incentives.

### 2.1.2 City Trip Reduction

City government will aggressively pursue the City shall maintain and where cost effective improve a trip reduction plan for City employees with the goal of achieving an AVR of 1.7 or larger.

**GO 9: Employee Commute**
Continue to reduce single-occupant employee commuting through trip reduction incentives.

### 2.1.3 Large Employers

The City will work with area employers, the Chamber of Commerce, Air Pollution Control District, Transportation Management Association, and other agencies to support establish a voluntary trip reduction commuter benefit options program. For employers with 50 or more that provides commute options for employees, the program will be structured as follows: Candidate employers will be surveyed to determine base year average vehicle ridership (AVR) levels. Candidate employers will be offered assistance in preparing plans to reduce automobile dependency of their work forces. Twenty-four months from the initiation of this assistance program, candidate employers will again be surveyed if.

**TLU: Public Outreach and Education**
Increase community awareness of transit options and established pedestrian and bicycle infrastructure. Inform residents and businesses about available incentives for commuting via carpool, transit and bicycle.

**GO 9: Employee Commute**
Continue to reduce single-occupant employee commuting through trip reduction incentives.
### General Plan Policy or Program

- **Environmental Impact Analysis**
  - **4.0 Environmental Impact Analysis**

#### Consistent CAP Strategies or Actions

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<td><strong>meaningful progress is made toward achieving AVR targets (a 10% or greater increase in AVR of the candidate work force), the voluntary participation program will continue. If meaningful progress has not been made toward achieving AVR targets, then the City will consider adopting a mandatory trip reduction ordinance.</strong></td>
<td><strong>• TLU 1.4 Continue to offer a free or discounted bus passes to residents who work in the downtown core, seniors and students.</strong></td>
</tr>
<tr>
<td><strong>2.1.4 Incentives for Educational Institutions</strong> The City shall 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.**</td>
<td><strong>TLU 9: Public Outreach and Education</strong> Increase community awareness of transit options and established pedestrian and bicycle infrastructure. Inform residents and businesses about available incentives for commuting via carpool, transit and bicycle.</td>
</tr>
<tr>
<td><strong>3.0.1 Transit Development</strong> The City shall encourage transit development, expansion, coordination and aggressive marketing throughout San Luis Obispo County to serve a broader range of local and regional transportation needs, including commuter service.</td>
<td><strong>TLU 1: Transit Services</strong> Continue to maintain and expand transit services utilizing best practices in planning and management.</td>
</tr>
<tr>
<td><strong>3.0.2 City Bus Service</strong> The City shall improve and expand city bus service to make the system more attractive, convenient and accessible, for everyone. Transit services owned and operated by the City shall endeavor to maintain and improve all system-side transit standards identified in the City’s Short Range Transit Plan.</td>
<td><strong>TLU 1: Transit Services</strong> Continue to maintain and expand transit services utilizing best practices in planning and management.</td>
</tr>
<tr>
<td><strong>3.0.5 Unmet Transit Needs</strong> The definition of Unmet Transit Needs used by the San Luis Obispo Regional Transportation Agency should continue to include transit service for a broad range of purposes. The City shall work with SLOCOG to identify and address Unmet Transit Needs.</td>
<td><strong>TLU 1: Transit Services</strong> Continue to maintain and expand transit services utilizing best practices in planning and management.</td>
</tr>
<tr>
<td><strong>3.0.7 Transit Service Access</strong> New development should be designed to facilitate access to transit service.</td>
<td><strong>TLU 1: Transit Services</strong> Continue to maintain and expand transit services utilizing best practices in planning and management.</td>
</tr>
<tr>
<td><strong>3.1.1 Transit Plans</strong> The City will adopt a short-range plan, continue to implement the Short Range Transit Plan (5-year time frame) and a long-range plan, coordinate with SLOCOG on implementing the Long Range Transit Master Plan, and coordinate with SLOCOG on implementing the Long Range Transit Master Plan (20-year time frame). The Plans shall consider funding partnerships to continue the Downtown Trolley service as part of the overall transit system as funding permits.</td>
<td><strong>• TLU 1.1 Implement the Short Range Transit Plan.</strong></td>
</tr>
<tr>
<td><strong>3.1.2 Bulk Rate Transit Passes</strong> The City shall make available bulk rate transit passes to all groups.</td>
<td><strong>• TLU 1.4 Continue to offer a free or discounted bus passes to residents who work in the downtown core, seniors and students.</strong></td>
</tr>
<tr>
<td><strong>3.1.3 Commuter Bus Service</strong> The City of San Luis Obispo should encourage work with</td>
<td><strong>TLU 1: Transit Services</strong> Continue to maintain and expand transit services utilizing best practices in planning and management.</td>
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| the San Luis Obispo Regional Transit Authority (SLORTA) to maintain and expand commuter bus service to Cuesta College and from the California Mens Colony City of San Luis Obispo during peak demand periods, consistent with the Short Range Transportation Plan and Long Range Transportation Plan. | best practices in planning and management.  
- TLU 1.1 Implement the Short Range Transit Plan. |
| **3.1.6 Regional Transit Center**  
The City shall work with other agencies to develop a regional transit center downtown. | TLU 1: Transit Services  
Continue to maintain and expand transit services utilizing best practices in planning and management. |
| **4.0.1 Bicycle Use**  
Bicycle transportation should be encouraged. The City shall expand the bicycle network and provide end-of-trip facilities to encourage bicycle use and to make bicycling safe, convenient and enjoyable. | TLU 3: Bike Travel  
Increase the percentage of non-recreational trips that are made by bicycle.  
- TLU 3.1 Modify Bicycle Transportation Plan (BTP) to achieve 20% bicycle mode share by 2020.  
- TLU 3.2 Develop additional funding and staff resources to implement the BTP, including cyclist safety programs and bicyclist commuter incentives.  
- TLU 3.3 Research opportunities for a bike-share program near parking facilities. |
| **4.0.3 Continuous Network**  
The City shall complete a continuous network of safe and convenient bikeways that connect neighborhoods with major activity centers and with county bike routes and related facilities as specified in the Bicycle Transportation Plan. The City shall collaborate with SLO County to coordinate planning and development of county bikeways to support a regional bike network and identify and acquire additional rights of way in the City as they become available. | TLU 3: Bike Travel  
Increase the percentage of non-recreational trips that are made by bicycle.  
- TLU 3.1 Modify Bicycle Transportation Plan (BTP) to achieve 20% bicycle mode share by 2020. |
| **4.0.4 New Development**  
The City shall require that new development should provide bikeways, secure bicycle storage, parking facilities and showers, consistent with City plans and development standards. When evaluating transportation impacts, the City shall use a Multimodal Level of Service analysis. | TLU 3: Bike Travel  
Increase the percentage of non-recreational trips that are made by bicycle.  
- TLU 3.2 Develop additional funding and staff resources to implement the BTP, including cyclist safety programs and bicyclist commuter incentives. |
| **4.0.8 Bicycle Transportation Coordinator**  
The City shall support the allocation of staff and resources to coordinate and implement the bicycle transportation plan, policies and programs. | TLU 3: Bike Travel  
Increase the percentage of non-recreational trips that are made by bicycle. |
| **4.0.10 Right-of-way Acquisition**  
The City shall identify and pursue the acquisition of right-of-ways needed to implement the projects identified in the City’s Bicycle Transportation Plan. | TLU 3: Bike Travel  
Increase the percentage of non-recreational trips that are made by bicycle. |
| **4.0.12 Bike Parking**  
The City shall facilitate development of conveniently located bike parking so as not to impede pedestrian walkways. | TLU 3: Bike Travel  
Increase the percentage of non-recreational trips that are made by bicycle. |
| **4.1.2 Bicycle Transportation Plan**  
The City will maintain and regularly update its bicycle. | TLU 3: Bike Travel  
Increase the percentage of non-recreational trips that are
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<tr>
<td><strong>4.0 Environmental Impact Analysis</strong></td>
<td></td>
</tr>
<tr>
<td><strong>4.1.5 Zoning Regulations</strong></td>
<td>- TLU 3.1 Modify Bicycle Transportation Plan (BTP) to achieve 20% bicycle mode share by 2020.</td>
</tr>
<tr>
<td>The City will modify its zoning regulations to establish and maintain standards for the installation of lockers, and secured bicycle parking, and showers ancillary facilities.</td>
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</tr>
<tr>
<td><strong>4.1.6 Railroad Bikeway and Trail</strong></td>
<td>- TLU 3.1 Modify Bicycle Transportation Plan (BTP) to achieve 20% bicycle mode share by 2020.</td>
</tr>
<tr>
<td>The City should obtain railroad right-of-way and easements to establish a separated bike path and pedestrian trail through San Luis Obispo.</td>
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</tr>
<tr>
<td><strong>4.1.7 Bicycle Friendly Community</strong></td>
<td>- TLU 3.1 Modify Bicycle Transportation Plan (BTP) to achieve 20% bicycle mode share by 2020.</td>
</tr>
<tr>
<td>The City shall maintain its silver level award designation as a Bicycle Friendly Community and pursue a gold level designation.</td>
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<tr>
<td><strong>New Program</strong></td>
<td>- TLU 3.1 Modify Bicycle Transportation Plan (BTP) to achieve 20% bicycle mode share by 2020.</td>
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<tr>
<td>The City shall collaborate with SLO County to coordinate planning and development of county bikeways to support a regional bicycle network.</td>
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<td><strong>New Program</strong></td>
<td>- TLU 3.1 Modify Bicycle Transportation Plan (BTP) to achieve 20% bicycle mode share by 2020.</td>
</tr>
<tr>
<td>The City should consider expanding its bicycle licensing program to address bicycle loss, theft, and safety problems.</td>
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<tr>
<td><strong>5.0.1 Promote Walking</strong></td>
<td>- TLU 4.3 Collaborate with SLO Regional Rideshare to expand Safe Routes to School programs, events, and projects.</td>
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<tr>
<td>Walking should be encouraged. The City shall encourage and promote walking as a regular means of transportation for people who live within a 20-minute walk of school, work, or routine shopping destinations.</td>
<td></td>
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<tr>
<td><strong>5.0.2 New Development</strong></td>
<td>- TLU 4.1 Require new and redeveloped street designs to address the needs of all users – motorists, pedestrians, bicyclists, children, persons with disabilities, seniors and users of public transit – where appropriate.</td>
</tr>
<tr>
<td>New development shall provide sidewalks and pedestrian paths consistent with City policies, plans, programs and standards.</td>
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</tr>
<tr>
<td><strong>5.0.3 Pedestrian Access</strong></td>
<td>- TLU 4.1 Require new and redeveloped street designs to address the needs of all users – motorists, pedestrians, bicyclists, children, persons with disabilities, seniors and users of public transit – where appropriate.</td>
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<tr>
<td>New or renovated commercial and government public buildings shall provide convenient pedestrian access from nearby sidewalks and pedestrian paths, separate from driveways and vehicle entrances.</td>
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<tr>
<td><strong>5.0.4 Pedestrian Access</strong></td>
<td>- TLU 4.1 Require new and redeveloped street designs to address the needs of all users – motorists, pedestrians, bicyclists, children, persons with disabilities, seniors and users of public transit – where appropriate.</td>
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<td>New or renovated commercial and government public buildings shall provide convenient pedestrian access from nearby sidewalks and pedestrian paths, separate from driveways and vehicle entrances.</td>
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<tr>
<th>5.0.5 Pedestrian Crossings</th>
<th>TLU 4: Complete Streets</th>
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<tr>
<td>To improve pedestrian crossing safety at heavily used intersections, the City shall institute the following:</td>
<td>Modify General Plan policies in the SLO2035 update to support a balanced, multimodal transportation network.</td>
</tr>
<tr>
<td>A. Install crossing controls, where warranted by the California Manual on Uniform Traffic Control Devices (MUTCD) that provide adequate time for pedestrians to cross the street.</td>
<td>• TLU 4.1 Require new and redeveloped street designs to address the needs of all users – motorists, pedestrians, bicyclists, children, persons with disabilities, seniors and users of public transit – where appropriate.</td>
</tr>
<tr>
<td>B. In the downtown, install traffic-calming features such as textured cross walks and landscaped bulb-outs, where appropriate.</td>
<td>• TLU 4.2 Develop and adopt a Downtown Pedestrian Plan.</td>
</tr>
<tr>
<td>C. On Arterial Streets, Parkways or Regional Routes with four or more travel lanes, install medians at pedestrian crossings where roadway width allows.</td>
<td>TLU 4: Complete Streets</td>
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<th>5.0.6 Downtown Commercial Core</th>
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<tr>
<td>Sidewalk areas in the commercial core should allow for the free flow of pedestrians and should include conveniently located rest areas with shade and seating. The City shall require that pedestrian facilities in the downtown be designed in accordance with the Downtown Pedestrian Plan design guidelines to allow a clear path of travel and include conveniently located rest areas with shade and seating.</td>
<td>Modify General Plan policies in the SLO2035 update to support a balanced, multimodal transportation network.</td>
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<tr>
<th>5.1.1 Downtown Pedestrian Plan</th>
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<tr>
<td>The City shall adopt and regularly update a Downtown Pedestrian Plan to encourage walking and to expand facilities that provide pedestrian linkages throughout the Downtown. The plan shall include pedestrian safety assessments in accordance with State and Federal guidelines.</td>
<td>• TLU 4.1 Require new and redeveloped street designs to address the needs of all users – motorists, pedestrians, bicyclists, children, persons with disabilities, seniors and users of public transit – where appropriate.</td>
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<th>5.1.2 Pedestrian Network</th>
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<tr>
<td>The For areas outside of the Downtown, the City will pursue implementation of its program for the installation of sidewalks to complete a continuous and connected pedestrian network throughout the community giving areas with the heaviest existing or potential pedestrian traffic priority in funding.</td>
<td>• TLU 4.2 Develop and adopt a Downtown Pedestrian Plan.</td>
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<tr>
<th>5.1.4 Safe Routes to School</th>
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<tr>
<td>The City should continue to coordinate with parents, SLOCOG and teachers of elementary school students to establish a &quot;suggested routing/local schools to school&quot; program for bicycling/pursue Safe Routes to School programs and walking grant opportunities.</td>
<td>• TLU 4.3 Collaborate with SLO Regional Rideshare to expand Safe Routes to School programs, events, and projects.</td>
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<tr>
<th>5.1.5 Consolidated Bicycle and Pedestrian Plan</th>
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<td>The City shall consider the benefits and costs of consolidating the Bicycle Transportation Plan with a citywide Pedestrian Plan.</td>
<td>Modify General Plan policies in the SLO2035 update to support a balanced, multimodal transportation network.</td>
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<th>Policy 6.0.A Complete Streets</th>
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<tr>
<th>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. <strong>Policy 6.0.B</strong> Multimodal Level of Service (LOS) <strong>Objectives, Service Standards, &amp; Significant Criteria</strong> 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, &amp; Vehicles per Table 6.0.1 and the Highway Capacity manual.</th>
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<tr>
<td><strong>T卢4: Complete Streets</strong> Modify General Plan policies in the SLO2035 update to support a balanced, multimodal transportation network.</td>
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| **Policy 6.0.C** Multimodal Priorities | In addition to maintaining minimum levels of service, multimodal service levels should be prioritized in accordance with the established modal priorities designated in Table 6.0.2, such that construction, expansion, or alteration for one mode should not degrade the service level of a higher priority mode. |
|---|
| **T卢4: Complete Streets** Modify General Plan policies in the SLO2035 update to support a balanced, multimodal transportation network. |

| **Policy 6.0.D** Defining Significant Circulation Impact | Any degradation of the level of service shall be minimized to the extent feasible in accordance with the modal priorities established in Policy 6.0.C. If the level of service degrades below thresholds established in policy 6.0.B, it shall be determined a significant impact for purposes of environmental review under the California Environmental Quality Act (CEQA). For roadways already operating below the established MMLOS standards, any further degradation to the MMLOS score will be considered a significant impact under CEQA. Where a potential impact is identified, the City in accordance with the modal priorities established in Policy 6.0.C, can determine if the modal impact in question is adequately served through other means e.g., another parallel facility or like service. Based on this determination, a finding of no significant impact may be determined by the City. |
| **T卢4: Complete Streets** Modify General Plan policies in the SLO2035 update to support a balanced, multimodal transportation network. |

<p>| <strong>Policy 6.0.E</strong> Mitigation | For significant impacts, developments shall be responsible for their fair share of any improvements required. Potential improvements for alternative mode may include, but are not limited to: |
|---|
| <strong>A. Pedestrian:</strong> Provision of sidewalk, providing or increasing a buffer from vehicular travel lanes, increased sidewalk clear width, providing a continuous barrier between pedestrians and vehicle traffic, improved crossings, reduced signal delay, traffic calming, no right turn on red, reducing intersection crossing distance. |
| <strong>B. Bicycle:</strong> Addition of a bicycle lane, traffic calming, provision of a buffer between bicycle and vehicle traffic, pavement resurfacing, reduced number of access points. |
| <strong>T卢4: Complete Streets</strong> Modify General Plan policies in the SLO2035 update to support a balanced, multimodal transportation network. |
| - T卢4.1 Require new and redeveloped street designs to address the needs of all users – motorists, pedestrians, bicyclists, children, persons with disabilities, seniors and users of public transit – where appropriate. |</p>
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<th>General Plan Policy or Program</th>
<th>Consistent CAP Strategies or Actions</th>
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<tbody>
<tr>
<td><strong>or provision of an exclusive bicycle path, reducing intersection crossing distance.</strong></td>
<td></td>
</tr>
<tr>
<td><strong>A-C. Transit:</strong> 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, or exclusive transit lanes.</td>
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</tr>
<tr>
<td><strong>MMLOS Programs</strong></td>
<td><strong>TLU 4: Complete Streets</strong></td>
</tr>
<tr>
<td>1. As funding permits the City shall biennially complete a traffic count program for pedestrians, bikes, vehicles and transit to maintain and update its database of transportation conditions and to evaluate the state of the transportation system in accordance with the established modal priorities and standards.</td>
<td>Modify General Plan policies in the SLO2035 update to support a balanced, multimodal transportation network.</td>
</tr>
<tr>
<td><strong>9.1.4 Conceptual Plan for the City’s Center</strong></td>
<td><strong>TLU 4: Complete Streets</strong></td>
</tr>
<tr>
<td>The City will evaluate optional complete street designs that maximize the shared right of way for all users as a method for achieving an overall objective of the Conceptual Physical Plan for the City's Center to improve the pedestrian environment in the commercial downtown core.</td>
<td>Modify General Plan policies in the SLO2035 update to support a balanced, multimodal transportation network.</td>
</tr>
<tr>
<td><strong>10.1.1 Idling Trucks</strong></td>
<td>No equivalent measure in CAP.</td>
</tr>
<tr>
<td>Trucks should turn off motors when parked. The City will work with the Air Pollution Control District (APCD) for guidance in establishing standards that address air and noise pollution from idling trucks.</td>
<td></td>
</tr>
<tr>
<td><strong>12.0.1 Interstate Passenger Rail Service</strong></td>
<td>No equivalent measure in CAP.</td>
</tr>
<tr>
<td>The City shall support the increased availability of rail service for travel within the county, state and among states.</td>
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</tr>
<tr>
<td><strong>12.0.2 State and Federal Programs</strong></td>
<td><strong>TLU 1.2 Continue to research federal and local funding for transit service upgrade projects.</strong></td>
</tr>
<tr>
<td>The City shall support Regional, State of federal, and Federal programs that support the expansion of passenger rail service to San Luis Obispo should be maintained and expanded.</td>
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</tr>
<tr>
<td><strong>12.0.3 Transit Service Connections</strong></td>
<td><strong>TLU 1.1 Implement the Short Range Transit Plan.</strong></td>
</tr>
<tr>
<td>The City shall provide transit service to and from the train station in accordance with its Short Range Transit Plan, and work with the train station management to upgrade the facility and visitor services.</td>
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</tr>
<tr>
<td><strong>13.1.6 Downtown Trolley</strong></td>
<td><strong>TLU 1: Transit Services</strong></td>
</tr>
<tr>
<td>The City shall continue to operate the downtown trolley as a parking management tool to reduce congestion.</td>
<td>Continue to maintain and expand transit services utilizing best practices in planning and management.</td>
</tr>
<tr>
<td><strong>TLU 6: Parking Management</strong></td>
<td>Motivate Downtown visitors to park once and walk or ride to multiple destinations, or use transit to get to and from downtown.</td>
</tr>
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<tr>
<th>General Plan Policy or Program</th>
<th>Consistent CAP Strategies or Actions</th>
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<tbody>
<tr>
<td><strong>16.0.1 City and Regional Growth</strong></td>
<td>• TLU 1.2 Continue to research federal and local funding for transit service upgrade projects.</td>
</tr>
<tr>
<td>The City should focus efforts on managing city and regional growth because they are the principal causes of traffic increases.</td>
<td></td>
</tr>
<tr>
<td>The City shall continue to be an active member of SLOCOG’s regional board to address regional transportation issues in San Luis Obispo County.</td>
<td></td>
</tr>
<tr>
<td><strong>16.0.2 Encourage Alternative Transportation</strong></td>
<td>TLU 1: Transit Services</td>
</tr>
<tr>
<td>Programs or projects that reduce dependence on single-occupant vehicles and encourage the use of alternative forms of transportation should be implemented first. Kalani be considered prior to roadway capacity increasing projects.</td>
<td>Continue to maintain and expand transit services utilizing best practices in planning and management.</td>
</tr>
<tr>
<td></td>
<td>TLU 3: Bike Travel</td>
</tr>
<tr>
<td></td>
<td>Increase the percentage of non-recreational trips that are made by bicycle.</td>
</tr>
<tr>
<td></td>
<td>TLU 4: Complete Streets</td>
</tr>
<tr>
<td></td>
<td>Modify General Plan policies in the SLO2035 update to support a balanced, multimodal transportation network.</td>
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Mitigation Measures

Since the proposed LUCE update includes policies and programs that are consistent with GHG reduction policies and measures that are in the CAP, as demonstrated in Table 4.7-3, communitywide GHG emissions reductions assumed in the CAP would be applicable to the proposed LUCE update. Therefore, the incremental contribution of GHG emissions associated with adoption and implementation of the proposed LUCE Update would not be cumulatively considerable, and additional mitigation is not required.

Significance After Mitigation

Implementation of proposed and existing policies would reduce potential impacts to a less-than-significant level.

4.7.3. Cumulative Impacts

Cumulative buildout of the proposed LUCE Update includes buildout of areas within existing city boundaries, as well as buildout of the identified expansion areas. Overall, development under the LUCE Update would increase development intensity within the city limits, as well as undeveloped areas to a more built environment, thereby resulting in the generation of greenhouse gas emissions.

By its nature, the LUCE Update considers cumulative development within the city and potential expansion areas. Thus, cumulative impacts are generally equivalent to project-specific impacts. The combination of these impacts reflects the cumulative impacts of the LUCE Update. As noted above, the existing General Plan, Climate Action Plan and the proposed LUCE Update protect air quality through policies and plan review. In addition, APCD thresholds of significance and consistency approach for long-term impacts are inherently cumulative in nature. Adherence to these requirements would reduce any impacts from buildout, as well as buildout of Specific Plan and Special Planning Areas identified in the LUCE Update to a the less than significant levels.
Please see the next page.
This section analyzes the City of San Luis Obispo LUCE Update potential impacts with respect to hazards and hazardous materials. Specifically, changes and impacts to hazardous materials, fire risk, radiation hazards, electromagnetic fields, airport hazards and hazardous trees are discussed. Two other major hazards, flood risk and seismic issues, are addressed in separate sections of this Environmental Impact Report (4.9 Hydrology and Water Quality; and 4.6 Geology and Soils, respectively).

4.8.1. Setting

The purpose of this section is to provide a setting for the city with respect to hazards regarding safety risks posed by airport flight patterns, impeding of adopted emergency response/evacuation plans, and wildland fires where wildlands are adjacent to urbanized areas; and hazardous materials or substances regarding routine transport or disposal of substances, explosion or release of substances, and emissions or handling of substances within one-quarter mile of an existing or planned school.

The hazards and hazardous materials setting for the city were discussed in detail in Section 6.8, Hazards and Hazardous Materials, of the corresponding City of San Luis Obispo General Plan Update Background Report. Please refer to the Background Report, which is incorporated herein by reference, for additional details with respect to the city’s hazards and hazardous materials setting.

The Background Report reviews the existing context for hazards and hazardous materials in the City of San Luis Obispo. It describes the defining aspects of hazards and hazardous materials in the city, including emissions, transport, release, storage location, proximity to existing structures, and disposal of hazardous materials, and how these issues are addressed in the existing General Plan. It also describes the regulatory environment as it relates to hazardous materials issues.

a. Fire Risk

Fires have the potential to cause significant losses to life, property, and the environment. Urban fire hazards result from the materials that make up the built environment, the size and organization of structures, and spacing of buildings. Additional factors that can accelerate fire hazards are availability of emergency access, available water volume and pressure for fire suppression, and response time for fire fighters. Fire hazard severity in rural areas, including areas on the edge between urban and rural land (commonly called the wildland interface), are highly influenced by the slope of the landscape and site vegetation and climate. This risk is somewhat amplified by the native, Mediterranean vegetation common to the rural setting in which the city is located that has evolved to rely on wildfires for its ecological sustainability. Where wildland fires may be a threat, plant fuels are often managed by replacement planting, grazing, plowing, or mechanical clearing.

Wildland fires affect grass, forest, and brushlands, as well as any structures on these lands. Such fires can result from either human-made or natural causes. The region’s topography, type, and amount of fuel, climate, and the availability of water for firefighting are the primary factors influencing the degree of fire risk. Vegetation fires comprise the majority of fires in San Luis Obispo County according to CAL FIRE.

Throughout California communities are increasingly concerned about wildfire safety as more development occurs in the rural areas and suppression of natural fires allows the understory to become dense, creating the potential for larger and
more intense wildland fires. Wind, weather, climate conditions, steepness of terrain, and naturally volatile or hot-burning vegetation provide fuels that contribute to the potential for wildland fires. Human activities such as smoking, debris burning, and equipment operation are often the major causes of wildland fires.

Wildland fire hazards exist in at the city’s edges. Refer to Figure 4.8-1, Fire Hazard Severity Zones, for a detailed depiction of the wildland fire risk assessment for the city’s outlying areas. The fire season usually extends approximately five to six months, from late Spring to Fall, or May through October, and is influenced by a combination of climatic, vegetative, and physiographic conditions (drought conditions have the potential to extend this period). Wildfire hazards are also based on where assets at risk are located, such as population centers or housing density.

**Topography:** The regional topographic conditions within the city and surrounding landscape can have a significant effect on wildland fire behavior. Steep slopes and canyons surrounding the city are conducive to channeling and dispersing winds that can create erratic wildfire conditions.

**Vegetation and Fuels:** Vegetation distribution throughout the city and surrounding landscape varies by location and topography, with most of the major differences observed between the developed portions of the city and the surrounding hills. Current land cover/fuels distribution within the city is generally characterized by the urban or built environment and the open spaces surrounding the city consisting of grasslands, chaparral vegetation, and oak woodlands. While herbaceous annual grassland cover can burn quickly under strong, dry wind patterns, it does not produce the high heat intensity and high flames associated with chaparral fuel types produces higher flames than those in grassland, although spread rates are typically slower. Fire behavior in woodlands is variable, depending on surface fuel conditions and the presence of ladder fuels. There are also certain vegetative types that have increased flammability based on the plant physiology, biological function, and physical structure. For example, the native shrub species that compose much of the chaparral vegetation around the foothills near the city present a high fire potential.

**Climate:** The overall weather patterns in San Luis Obispo are not only affected by topography, but also by the region’s proximity to the Pacific Ocean. The climate enjoyed by the city is influenced by the ocean’s weather patterns and humidity levels. However, the city typically sees less fog and marine layer as compared to the coastal portions of the County. Temperatures are relatively stable and average annual rainfall is approximately 22 inches per year.

**Fire Hazard Severity Zones:** Determining wildfire hazards and severity zones in the San Luis Obispo planning area involves assessing the presence of fire-prone vegetation, weather, topography, assets at risk, and the fire protection system’s ability to deal with the occurrence of fire (i.e., levels of service). Each parameter helps determine where a fire is likely to start, and once ignited, the direction fire will spread, the intensity at which it can burn, and how efficiently fire protection services can respond. Identifying fire hazard is a way to measure the physical fire behavior so that people can predict the damage a fire is likely to cause. Fire hazard measurement includes the speed at which a wildfire moves, the amount of heat the fire produces, and the burning fire brands (i.e., sparks/embers) that the fire sends ahead of the flame front. The fire hazard model considers several parameters to determine wildfire hazard severity zones, including: topography, such as steepness of slopes, since fires burn faster as they burn up-slope; weather (e.g., temperature, humidity, and wind), which has a significant influence on fire behavior; and the surface vegetation fuel coverage, also known as wildland fuels.

Government Code Sections 51175 through 51189 require identification of land within very high fire hazard severity zones to identify measures that will mitigate uncontrolled fires that threaten to destroy resources, life, or property, and to require that those measures be taken (refer to Figure 4.8-1). Properties within these zones are required to utilize Wildland-Urban Interface Fire Area Building Standards to minimize the threat of property damage in the event a wildfire occurs in close proximity to these properties. The objective of the Wildland-Urban Interface Fire Area Building Standards is to establish minimum standards for materials and construction to provide a reasonable level of exterior wildfire exposure protection for buildings in Very High Fire Hazard Severity Zones and other areas designated by the City Council after a public hearing. The city has not identified a separate Wildland-Urban Interface Fire Zone but rather has determined it to be coterminous with the state-identified Very High Fire Hazard Severity Zone. However, Local building code has been adopted to address the idea that the City is within an area that may put the community at risk of impacts from wildland fires and has increased construction requirements to address fire hazard.
Figure 4.8-1
City of SLO Planning Area Fire Hazard Severity Zones

Source: CalFire, Fire Hazard Severity Zone Data, November 2007
b. Hazardous Materials

Hazardous materials are defined as substances with physical and chemical properties of ignitability, corrosivity, reactivity, or toxicity which may pose a threat to human health or the environment. This includes, for example, chemical materials such as petroleum products, solvents, pesticides, herbicides, paints, metals, asbestos, and other regulated chemical materials. Additionally, hazards include known historical spills, leaks, illegal dumping, or other methods of release of hazardous materials to soil, sediment, groundwater, or surface water. If a historical release exists, then there is a risk associated with disturbing the historical release area. Examples of these are gas stations and areas that historically included oil production.

The potential for risks associated with hazardous materials are varied regionally. The primary risk concerns identified by the city, as stipulated in the City’s General Plan Safety Element, include radiation hazards and the transportation of hazardous materials in and around the city.

Hazardous Materials Transportation: Because of the widespread use of hazardous materials in our communities, minor and major hazardous materials spills and incidents occur. Most of these incidents are related to the increasing frequency of transport of chemicals over roadways, railways or through industrial accidents. Highway 101 and a rail corridor are major transportation corridors through the San Luis Obispo area. Trains and trucks commonly carry a variety of hazardous materials, including gasoline and various crude oil derivatives, and other chemicals known to cause human health problems. When properly contained, these materials present no hazard to the community. But in the event of an accident or derailment, such materials may be released, either in liquid or gas form. In the case of some chemicals (such as chlorine), highly toxic fumes may be carried far from the accident site.

Transports of hazardous waste in California are subject to many federal and state regulations. They must register with the California Department of Health Services (DHS) and ensure that vehicle and waste container operators have been trained in the proper handling of hazardous waste. Vehicles used for the transportation of hazardous waste must pass an annual inspection by the California Highway Patrol. Transports must allow the Highway Patrol and/or the DHS to inspect its vehicles and must make certain required inspection records available to both agencies. The transport of hazardous materials that are not wastes is regulated by the U.S. Department of Transportation through national safety standards.

Other risks resulting from hazardous materials include the use of these materials in local industry, businesses and agricultural production. The owner or operator of any business or entity that handles a hazardous material above threshold quantities is required, by State and Federal laws, to submit a Business Plan to the local Certified Unified Program Agency (CUPA). San Luis Obispo County Environmental Health Services Division is the CUPA and the City of San Luis Obispo Fire Department administers the program within the city.

In order to address the risks to health and property associated with hazardous material releases, the City of San Luis Obispo Fire Department maintains several active programs designed to address emergency situations, including the release of hazardous materials.

c. Radiation Hazards

Ionizing radiation damages tissues at the molecular and genetic levels, causing a host of illnesses and reproductive problems. The particular type of damage depends on the intensity and duration of exposure and the part of the body that is exposed. People have evolved in an environment that includes very low-level exposure to natural sources of radiation. Various sources can cause exposure to much higher levels.

The Diablo Canyon Nuclear Power Plant is the primary hazard for ionizing radiation in the San Luis Obispo area. Risks result from the potential for mistakes during day-to-day operations, accidents associated with refueling, and damage from earthquakes or other causes. There is added risk from on-site storage of spent fuel that remains radioactive for several generations. Long-term, off-site storage facilities for spent fuel are not available. A release of radioactive material could seriously damage health and make property unusable. The plant operator and local agencies have jointly prepared plans for warning, sheltering, evacuation, and other responses to radiation emergencies. Updated information regarding the Emergency Response Plan is distributed to the public each year. The plant is regulated by the Federal Government. Land close to the plant, and downwind from it under prevailing conditions, is under County jurisdiction.
Relatively low-level radioactive materials and waste result from some medical facilities and other sources. The use, transportation, and disposal of these materials are governed by State and Federal regulations.

Radon is a naturally occurring gas produced by the breakdown of traces of uranium in certain soils and rocks. This gas can accumulate inside structures where building materials emit or trap radon, posing a significant health hazard. Soils and rocks in the San Luis Obispo area are not known to be sources of radon, so it is not considered a substantial local hazard.

**d. Electromagnetic Fields**

Pacific Gas and Electric Company (PG&E) provides the City San Luis Obispo with electricity through a series of electrical lines. The City General Plan Safety Element identifies these power lines as 115 kilovolt (kV) transmission lines (Refer to Figure 4.8-2). High voltage transmission lines generate electrical fields, defined as the change in voltage over distance.

The strength of the field is a function of the line voltage, distance between the line and the point of measurement, the design of the line, and the electrical phasing characteristics. The largest transmission lines in California (500 kV) typically have a maximum electric field directly under the conductors as high as about 7-9 kV/m.

As with electric fields, the strength of the magnetic field decreases as the distance from the source increases. Magnetic fields on the ground measured under electrical transmission lines are usually smaller than the magnetic fields associated with electrical appliances. This is primarily caused by the attenuation of the field with distance. The height of the power line from the ground reduces the field at ground level, whereas the strength of magnetic fields in household appliances can be high if the measurement is taken near the source. Appliances that have the highest magnetic fields are those that have high currents or high speed electrical motors.

**Medical Effects of Electromagnetic Sources:** Power lines emit very low levels of radiant energy. As a result, electric fields produce very little biological effects because these fields are not strong enough to penetrate through structures or even human skin. However, it is the development of magnetic fields by electric currents that have the potential to affect biological systems. In general, magnetic fields are elevated in structures near power lines whereas electrical fields are not.

**Medical Studies:** In June, 1999, the National Institute of Environmental Health Science completed a research program which concluded that the probability of exposure to EMF being a health hazard is small. However, there are no direct studies available that prove the health effects of EMF, positive or negative. PG&E makes information available to its customers, such as a question and answer packet and a flier that compares EMF exposure from utility lines to that of common kitchen appliances.
Source: San Luis Obispo County for the Census Bureau, August 2001

Figure 4.8-2

Power Lines and Power Plants

Source: San Luis Obispo County for the Census Bureau, August 2001
e. Airport Hazards

The San Luis Obispo County Airport provides commuter, charter, and private aviation service to the area. The primary hazard associated with land uses near the airport is the risk of aircraft incidents on approach and take-off. Aircraft flight operations are determined largely by the physical layout of the airport and rules of the Federal Aviation Administration. The County manages activities on the airport property. The San Luis Obispo County Airport Land Use Commission (ALUC) is an independent body of seven members that was created in response to the mandates of The State Aeronautics Act, first enacted in 1967. Under the Public Utilities Code Section 21674, it is the duty of the ALUC:

- to assist local agencies in ensuring compatible land uses in the vicinity of all new airports and in the vicinity of existing airports to the extent that the land in the vicinity is not already devoted to incompatible uses;
- to coordinate planning at the state, regional, and local levels so as to provide for the orderly development of air transportation, while at the same time protecting the public health, safety, and welfare;
- To prepare and adopt an airport land use compatibility plan pursuant to Section 21675.; and
- To review the plans, regulations, and other actions of local agencies and airport operators pursuant to Section 21676.

As the means of fulfilling these basic obligations, the ALUC, must prepare and adopt Airport Land Use Plans for each airport within their jurisdiction. In addition to formulating ALUP’s, the ALUC is required to review certain types of actions by local counties and cities, which affect the land use in the vicinity of airports for consistency with the ALUP. Although the ALUC is not part of any local governmental structure, the City of San Luis Obispo must refer certain local actions to the ALUC. Those local actions include:

- general plans and general plan amendments;
- specific plans and specific plan amendments;
- zoning ordinances & zoning ordinance amendments; and,
- building regulations and modifications thereof.

The policies in the ALUP are intended to minimize the public’s exposure to excessive noise and safety hazards while providing for the orderly expansion of airports (Public Utility Code Section 21670(a)(2 (please refer to Figure 4.8-3). The ALUC has developed an Airport Land Use Plan (ALUP) for the San Luis Obispo County Regional Airport that was first adopted in 1973, was updated in May 2005 and is currently being updated. The ALUP has identified safety zones with associated land use density and intensity restrictions. The ALUP defines these as:

a. Runway Protection Zones – Areas immediately adjacent to the ends of each active runway, within which the level of aviation safety risk is very high and in which, consequently, structures are prohibited and human activities are restricted to those which require only very low levels of occupancy. The size and configuration of the Runway Protection Zones are specified by Federal Aviation Regulations. The Runway Protection Zones are also referred to as the “clear zones” for each runway.

b. Safety Areas S-1 a through c– The area, as designated in Figure 3 of the ALUP, within the vicinity of which aircraft operate frequently or in conditions of reduced visibility at altitudes less than 500 feet above ground level (AGL).

c. Safety Area S-2 – The area within the vicinity of which aircraft operate frequently or in conditions of reduced visibility at altitudes between 501 and 1000 feet above ground level (AGL). Aviation safety hazards identified in the ALUP include mechanical failures, fuel exhaustion, loss of control during turns from downwind to base legs or from base to final legs of the traffic pattern, stall/spin incidents during engine-out maneuvers in twin engine aircraft, and midair collisions. Because aircraft in Area S-2 are at greater altitude and are less densely concentrated than in other portions of the Airport Planning Area, the overall level of aviation safety risk is considered to be lower than that in Area S-1 or the Runway Protection Zones.
Figure 4.8-3
Airport Hazards
The Airport Land Use Commission 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 in the next section discusses potential land use conflicts with the existing ALUP as well as a discussion of hazard and safety considerations framed by the Airport Land Use Compatibility Report prepared by Johnson Aviation.

f. Hazardous Trees
Trees as part of a rural landscape or the urban forest are an important feature of the City of in San Luis Obispo. Trees help make San Luis Obispo attractive for people and wildlife. However, as trees age, particularly those of excessive size, they pose a risk from falling limbs or toppling. Strong winds and saturated soils or erosion around roots contribute to the hazard of aging trees. Falling branches or whole trees can harm people, damage property, and interrupt access, storm runoff, and power and communications.

The City trims trees along streets and on parks and grounds, with safety as one objective. The City also notifies property owners of hazardous trees, and works with owners, the local flood control district, and State programs to deal with trees along creeks. In order to address the City’s urban forest and trees, the City formed an official Tree Committee. The Tree Committee was established in 1977, is staffed by the City Arborist, and meets on the fourth Monday of the month to consider tree removal requests, to maintain the Master Tree List, and other issues.

The Tree Committee makes recommendations to the Council and staff on tree policies and regulations. The Committee has seven members who have an interest or expertise in horticulture; including one member from the Architectural Review Commission and one from the Parks and Recreation Commission. Members must be residents and registered voters of the City. The function of the tree committee is to consider tree removal requests, to work with staff and prepare and maintain a Master Tree List and a Tree Planting Plan.

The tree maintenance program plants, maintains, and preserves trees along City streets and on City property. The program goal is to provide an attractive, healthy, and safe urban forest which beautifies the City, purifies the air, and provides shade and wind protection.

g. Regulatory Setting
The City of San Luis Obispo regulates hazards and hazardous materials through implementation of adopted policies and programs. The City’s General Plan Land Use and Circulation Element Update, Conservation and Open Space Element, Safety Element, as well as the implementing statutes of the Municipal Code/Zoning Code and Community Design Guidelines are the core of this mechanism. Please refer to the project Background Report for a detailed discussion of the regulatory setting for hazards and hazardous materials. The impact analysis in Section 4.8, below, includes City policies intended to recognize potential hazards and hazardous materials and mitigate the effects of growth and development.

The San Luis Obispo County Airport Land Use Plan is a mandatory document prepared in compliance with Public Utilities Code to address compatibility of uses and development near the San Luis Obispo County Regional Airport. The plan is administered by an Airport Land Use Commission (ALUC).

4.8.2 Impact Analysis

a. Methodology and Significance Thresholds
The assessment of hazards and hazardous material impacts involves a quantitative analysis of the amount of emissions, use, transportation, and disposal of hazardous materials; as well as a qualitative analysis of the types of hazardous materials and their properties while considering the surrounding community, structures, and environment of which they are present. An analysis of these components associated with hazardous materials is primarily objective, with the subjective aspect consisting of differences in public opinion regarding which resources and locations are worth protecting, which will influence the evaluation process.

An impact is considered significant if the proposed development scenario under the LUCE Update would result in one or more of the following conditions:
Create a significant hazard to the public or environment through the routine transport, use, or disposal of hazardous materials;

Create a significant hazard to the public or environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment;

Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;

Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would create a significant hazard to the public or the environment;

For the area within the airport land use plan, result in a safety hazard for people residing or working in the area;

Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; or,

Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

b. Project Impacts

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<td>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>
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The LUCE Update would facilitate new development (including residences) within several areas in and around the city where hazardous materials could be stored or used, or where previous use has resulted in contamination of the site. Residential development in proximity to commercial or industrial facilities using or storing hazardous materials has the potential to increase the risk of exposure to harmful health effects. Areas where users of hazardous materials are located are confined primarily to commercial and industrial areas of the city. The proposed Airport overlay zone and compatibility criteria changes would not, in and of themselves, result in an environmental impact. However, future development in areas under the given zones could result in impacts and are discussed here in relation to the general development anticipated under the LUCE Update.

During construction, activities under the policies within the LUCE Update may use hazardous materials which could be a threat if they were to have an adverse impact on the public or environment. This includes the generation of hazardous waste, potential release or explosion of substances, and construction taking place within a quarter mile of an established or planned school or construction within a site which is included on a list of hazardous material sites compiled pursuant to Government Code §65962.5 resulting in the creation of a significant hazard to the public or the environment.

By allowing for residential or mixed use development in commercial and industrial areas where there may have been past use or there may be current use of hazardous materials, the potential for exposure may increase due to: (1) potential soil/groundwater contamination resulting from past practices; and (2) the proximity of new residential development to ongoing activity involving the use of hazardous materials. Development or redevelopment in these areas would have the potential for exposure of hazardous materials to the public. The magnitude of exposure to hazards for individual projects would depend upon the location, type, and size of development and the specific hazards associated with individual sites.

Older structures throughout the city could potentially have asbestos containing materials (ACM) and/or lead-based paint (LBP). If demolition of these structures occurred, ACM or LBP could be released, resulting in adverse health effects. To prevent health risks to occupants or construction workers, proper ACM and LBP abatement and disposal procedures are required to be undertaken whenever the demolition is considered for structures that were built prior to 1979.
The presence of soil or groundwater contamination would depend upon the location of the construction site and its proximity to sources of contamination. Depending on the previous land uses, new development could present potential risk of exposure to contamination associated with agricultural pesticide use, leaking underground storage tanks (LUSTs), undocumented abandoned oil and gas wells, and/or various industrial contaminants. Hence, development of vacant and underutilized sites under buildout would increase the potential for exposure to soil and groundwater contamination hazards. However, any necessary assessment and remediation of the properties would be completed in accordance with applicable regulatory requirements prior to development. In addition to compliance with General Plan policies and regulatory requirements, mitigation would be required to reduce potential impacts to a less than significant level.

Because future development would be subject to the City goals and policies discussed below, the LUCE Update would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

Proposed changes to the Airport policies and programs and implementation through the Zoning Code regulations will not impact adopted emergency response/evacuation plans. The City of San Luis Obispo Fire Department will continue to maintain programs designed to address emergency situations, including the release of hazardous materials.

Proposed LUCE Update Development Special Planning 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 development near known hazardous material users, or construction in areas with existing hazardous materials, that could expose individuals to health risks due to soil groundwater contamination or emission of hazardous materials into the air, 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 new development near known hazardous material users, or construction in areas with existing hazardous materials, that could expose individuals to health risks due to soil groundwater contamination or emission of hazardous materials into the air.

Proposed Land Use Element Development Special Planning Areas

- **Foothill @ Santa Rosa Area:** This is an urbanized area of the city core and is located at the northern end of the city, serving as a gateway into the city (and the Cal Poly campus) for southbound travelers along Highway 1. This area supports existing gas/service stations with the potential to exhibit hazardous materials issues. Future mixed use development in this area, as envisioned under the LUCE Update, would be located near known hazardous material users, or could result in construction in areas with existing hazardous materials that could expose individuals to health risks due to soil groundwater contamination or emission of hazardous materials into the air;

- **Caltrans Site:** This area is located near the Marsh Street off-ramp on Highway 101, at the intersection of Higuera Street and Marsh Street. Because this site includes shops for the servicing of Caltrans equipment and vehicles, there is a potential for the use and presence of hazardous materials. Future mixed use development in this area, as envisioned under the LUCE Update, could be located near known hazardous material users, or could result in construction in areas with existing hazardous materials that could expose individuals to health risks due to soil groundwater contamination or emission of hazardous materials into the air;

- **General Hospital Site:** This area is located along the eastern boundary of the city, near the intersection of Johnson Avenue and Bishop Street and represents an urban interface with the hillsides and designated Open Space to the east. Hospitals include the use and storage of hazardous materials as it relates to medical equipment, and disposal of medications and chemicals used in the medical profession. Future residential
development in this area, as envisioned under the LUCE Update, could be located near known hazardous material users, or could result in construction in areas with existing hazardous materials that could expose individuals to health risks due to soil/groundwater contamination or emission of hazardous materials into the air;

- **Sunset Drive-In Site**: This site is located near the intersection of Prado Road and Elks Lane, at the southern boundary of the city, just east of Highway 101. The drive-in consists of a large parking lot that could have been subject to potential hazardous materials related to vehicle fluid leaks over the years. The consideration of future mixed use development in this area, as envisioned under the LUCE Update, could result in construction in areas with existing hazardous materials that could expose individuals to health risks due to soil/groundwater contamination or emission of hazardous materials into the air;

- **Calle Joaquin Auto Sales Area**: This portion of Calle Joaquin is parallel to and west of Highway 101, south of the city, and is adjacent to the San Luis Ranch Specific Plan area. This area has been used for commercial vehicle sales for decades and has the potential exhibit hazardous materials impacts related to fuel/vehicle fluid storage, vehicle fueling on-site, and vehicle fluid leaks. Future mixed use development in this area, as envisioned under the LUCE Update, could be located near known hazardous material users, or could result in construction in areas with existing hazardous materials that could expose individuals to health risks due to soil/groundwater contamination or emission of hazardous materials into the air;

- **Broad Street @ Tank Farm Road Site**: This site is located at the southern limit of the city, representing the historic limits to the city when the area was predominantly agricultural in nature. The area currently supports the Marigold Shopping Center and the mixed use commercial/office development adjacent to the Shell Station. Historic storage of agricultural chemicals and the current location of the gas station could potentially result in the presence of hazardous materials in this area. Future mixed use development envisioned under the LUCE Update could be located near known hazardous material users, or could result in construction in areas with existing hazardous materials that could expose individuals to health risks due to soil/groundwater contamination or emission of hazardous materials into the air.

**Proposed Circulation Element Street Network Changes**

- **Transit Center Location on Santa Rosa Street and Higuera Street**: This street intersection is within the city downtown core and represents a gateway into the commercial/retail center of the downtown core. This area has been used for commercial vehicle sales for decades and has the potential exhibit hazardous materials impacts related to fuel/vehicle fluid storage, vehicle fueling on-site, and vehicle fluid leaks. In addition, this area is adjacent to an existing gas/service station with the potential to exhibit hazardous materials issues. The development of a future Transit Center, as envisioned under the LUCE Update, could be located near known hazardous material users, or could result in construction in areas with existing hazardous materials that could expose individuals to health risks due to soil/groundwater contamination or emission of hazardous materials into the air.

The potential impacts related to implementation of the above development area projects and street network changes would be considered significant, however, incorporation of the LUCE Update policies and existing City policies discussed below would reduce impacts to less than significant levels. Implementation of the development area projects and street network changes would not impact any emergency services or physically block or impact any evacuation plans.

**Proposed Land Use Element Specific Plan Areas**

- **San Luis Ranch Specific Plan Area**
4.0 Environmental Impact Analysis

This area is located in the southwest quarter of the city at the corner of Madonna Road and Dalidio Drive and is characterized primarily by its use as an agricultural property which is mainly undeveloped with the exception of a small amount of agricultural support development. The San Luis Ranch Specific Plan Area is currently in agricultural production. Although there are no records of previous or existing sources of contamination in this area, historic agricultural use onsite may have resulted in undocumented residual quantities of presently-banned agricultural chemicals, which could pose a health hazard to construction workers or future residents or visitors.

- **Madonna on Los Osos Valley Road Specific Plan Area**

  This site is located directly west of the intersection of Los Osos Valley Road and Calle Joaquin and is characterized primarily by its use as an agricultural property which is mainly undeveloped with the exception of some agricultural support development and offices associated with Madonna Construction.

  There are no records of previous or existing sources of contamination in this area. However, as with the San Luis Ranch Specific Plan Area, historic agricultural use onsite may have resulted in undocumented residual quantities of presently-banned agricultural chemicals, which could pose a health hazard to construction workers or future residents or visitors.

- **Avila Ranch Specific Plan Area**

  This site is located on the north side of Buckley Road at the far southern edge of the city. The site is characterized by some service and manufacturing development, with the majority of the site undeveloped and used for agriculture (primarily livestock grazing). There are no records of previous or existing sources of contamination in this area.

  Historic agricultural use in this area may have resulted in undocumented residual quantities of presently-banned agricultural chemicals, which could pose a health hazard to construction workers or future residents or visitors.

  In addition, this site is located in direct proximity to the Chevron Tank Farm site currently undergoing final project approvals for the remediation of historic petroleum spills dating back to the 1920s and continuing through the final closure of the property. Although extensive testing and groundwater monitoring at this site 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.

- **South Broad Street Special Planning Area**

  The South Broad Street Area encompasses approximately 86 acres and is bounded by Broad Street on the west, the Union Pacific Railroad on the east, High Street to the north, and Orcutt Road to the south. The South Broad Street Special Planning Area is located in the urbanized core of the city, in an existing developed environment. This area supports an existing gas/service station at the corner of Broad and Orcutt Streets with the potential to exhibit hazardous materials issues. Future mixed use development in this area, as envisioned under the LUCE Update, would be located near a known hazardous material user, and could potentially result in construction in areas with existing hazardous materials that could expose individuals to health risks due to soil/groundwater contamination or emission of hazardous materials into the air. However, implementation of the proposed LUCE Update policies; compliance with current federal and state requirements; and the existing City policies identified below, would reduce impacts to less than significant levels.

Further research, testing and remediation for all of the Specific Plan Areas, including soil and groundwater sampling, under the appropriate oversight agency would reduce the risk of possible contamination. Such assessments would be completed as part of the project-level review for development in these areas. In addition, implementation of the proposed LUCE Update policies; compliance with current federal and state requirements; and the existing City policies identified below, would reduce impacts to less than significant levels.
Applicable LUCE Update Policies
The General Plan Land Use Element Update draft includes edits to existing policies and programs for development near known hazardous material users, or construction in areas with existing hazardous materials, that could expose individuals to health risks due to soil/groundwater contamination or emission of hazardous materials into the air (policy language edited as part of the LUCE Update is shown using “strikeout and underline” format), while some existing language was retained after critical review:

2.2.11 Residential Project Objectives. Residential projects should provide:

A. Privacy, for occupants and neighbors of the project;
B. Adequate usable outdoor area, sheltered from noise and prevailing winds, and oriented to receive light and sunshine
C. Use of natural ventilation, sunlight, and shade to make indoor and outdoor spaces comfortable with minimum mechanical support.
D. Pleasant views from and toward the project;
E. Security and safety.
F. Bicycle facilities consistent with the City’s Bicycle Plan. Separate paths for vehicles and for people, and bike paths along collector streets;
G. Adequate parking and storage space;
H. Noise and visual separation from adjacent roads and commercial uses. (Barrier walls, isolating a project, are not desirable. Noise mitigation walls may be used only when there is no practicable alternative. Where walls are used, they should help create an attractive pedestrian, residential setting through features such as setbacks, changes in alignment, detail and texture, places for people to walk through them at regular intervals, and planting.)
I. Design elements that facilitate neighborhood interaction, such as front porches, front yards along streets, and entryways facing public walkways.
J. Buffers from hazardous materials transport routes, as recommended by the City Fire Department.

6.2.6 Homesites Outside the Limit Lines. Where homesites are to be developed outside the urban reserve or development limit lines, and beyond the City’s jurisdiction they within the City’s greenbelt, the City shall encourage the County to promote the transfer of development credits into the Downtown Core or Specific Plan area. If development is to proceed in these areas, the City shall encourage the County to only allow creation of homesites consistent with the following guidelines:

A. Be on land sloping less than 15 percent;
B. Have effective emergency-vehicle access from a City street or County road;
C. Be on a geologically stable site;
D. Have adequate water supply for domestic service and fire suppression;
E. Avoid areas with high wildland fire hazard;
F. Be next to existing development;
G. Avoid significant visual impacts;
H. Be clustered to minimize impacts and retain open space.

12.3.11 Environmental Review. The purpose of the City’s Environmental Review process is to develop and maintain a high quality environment now and in the future. Some projects may be exempted from environmental review by state law or city procedures. For those projects subject to environmental review, features to be examined would include but not be limited to, toxic contamination, air quality, open space preservation, sustainability impacts, scenic values and impacts, airport operations, ground slopes, seismic hazards, soil and groundwater characteristics, wildlife habitats, road and rail traffic noise, water and sewer service limits, access and circulation, and historic and archaeological resources, is a formal way to inform the
public and decision-makers of the expected consequences of their actions. Two common types of environmental documents are environmental impacts reports and “initial studies.” Before considering private proposals for a major development, such as a specific plan or special-design area, the City must conduct an evaluation of environmental opportunities and constraints, to which a private proposal can respond. The City is committed to early and meaningful participation by the community in the environmental review process to help inform the public and decision-makers of the potential environmental consequences of their actions. Features to be examined would include toxic contamination, airport operations, ground slopes, seismic hazards, soil and groundwater characteristics, significant wildlife habitats, road and rail traffic noise, water and sewer service limits, access and circulation, and historic and archaeological resources.

Applicable Existing City Policies
The existing General Plan Safety Element (2006) lists policies for development near known hazardous material users, or construction in areas with existing hazardous materials or general hazardous conditions, that could expose individuals to health risks due to soil/groundwater contamination or emission of hazardous materials into the air which include:

6.1 Other Hazardous Materials. Hazardous materials include a wide range of solids, liquids, and gases that are flammable, explosive, corrosive, or toxic. Because large amounts of hazardous materials are shipped through the San Luis Obispo area daily, transportation accidents pose the most significant hazardous material risk to City residents and the environment. Hazardous materials are transported along highways, the railroad, and pipelines, which pass through the city.

Public exposure to hazardous materials also can result from their use by industry, agriculture, and services. In 1999, there were about 145 businesses in the City using hazardous materials in sufficient quantities to require filing a report with the Fire Department, as required by the California Health and Safety Code. Household use of hazardous materials is also a threat to health and the environment.

6.2 Policy S: Minimizing Hazardous Materials Exposure. People’s exposure to hazardous substances should be minimized.

6.3 Policy S: Hazardous Materials in City Operations. The City should avoid using hazardous materials in its own operations to the greatest extent practical, and will follow all established health and safety practices when they are used.

In addition to the policies and programs listed above, the General Plan Safety Element includes a comprehensive set of policies and programs intended to address avoiding and preparing for emergencies in general. This includes programs and requirements intended to avoid several kinds of emergencies and to respond to those that occur. As shown below, this is an extensive list and it is the intent of this EIR analysis to incorporate the details of the following policies by reference:

10.0 Policy S: Avoiding and Mitigating Hazards [reworded from the Open Space Element]

10.1 Policy S: Emergency Preparedness and Response

10.2 Program S: City Activities

10.3 Program S: Response Performance Standards

10.4 Program S: Staff Training

10.5 Program S: Specific Emergency-Response Information

10.6 Program S: Coordinated Emergency Planning

10.7 Program S: Emergency Operations Center

10.8 Program S: Information and Planning Updates

10.9 Program S: City Emergency Plan

10.10 Program S: Mutual and Automatic Aid

10.11 Program S: Disaster Recovery
10.12 Policy S: Critical Facilities Locations
10.13 Policy S: Emergency Access and Evacuation
10.14 Policy S: Preparedness Education
10.15 Program S: Citizen Information and Training
10.16 Program S: Other Organizations
10.17 Program S: Voluntary Inspections
10.18 Policy S: Safety of Structures and Facilities
10.19 Program S: Reducing Structural Hazards
10.20 Program S: Planning Standards
10.21 Program S: Development Review
10.22 Program S: Building and Fire Regulations
10.23 Program S: Required Inspections

The City Demolition and Moving of Buildings Section 115 Public Safety Requirements include general requirements for building demolition activities, permitting for such activities, hauling operations, and routes of moving materials in order to address hazardous materials issues. In addition, there are subsections included for dust and debris, fire safety, and removal and disposal of demolition materials. In addition, adherence to the Federal Asbestos NESHAP regulations and State and Federal regulations pertaining to the abatement of lead based paints will reduce exposure of these materials. In addition, the City of San Luis Obispo Fire Department Hazardous Waste Generator Permit ensures that the City Fire Department permits hazardous waste generators in San Luis Obispo County.

Adherence to the existing City’s General Plan, the proposed LUCE Update, federal and state regulations, will ensure that development near known hazardous material users, or construction in areas with existing hazardous materials that could expose individuals to health risks due to soil/groundwater contamination or emission of hazardous materials into the air will remain a less than significant impact. No additional policy direction would be required. Individual development would be required to undergo separate environmental review, which may result in specific impacts that require project specific mitigation consistent with these policies.

Mitigation Measures
Development facilitated by LUCE Update could occur near known hazardous material users, result in construction in areas with existing hazardous materials, could expose individuals to health risks due to soil/groundwater contamination or emission of hazardous materials into the air, or could impact an adopted emergency response/evacuation plan. Additionally, future development could introduce sensitive receptors to hazards associated with radiation, electromagnetic fields and hazardous trees. However, the proposed and existing City policies and programs discussed above directly address future development with the potential to result in these hazardous conditions through avoidance and preparation and through Federal, State and local regulations. 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. As such, with the incorporation of the proposed project and adherence to existing City policies and programs discussed above, additional mitigation is not required.

Significance After Mitigation
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.
Impact HAZ-2

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.

The San Luis Obispo Airport is located immediately south of the city. The proposed Airport Overlay Zone and compatibility criteria changes would not, in and of themselves, result in an environmental impact. However, future development in areas under the given zones could result in impacts and are discussed here in relation to the general development anticipated under the LUCE Update. Portions of the City of San Luis Obispo are flown over by aircraft approaching or departing from this airport. Aircraft overflights of occupied urban areas present a potential for off-airport aircraft accidents, which could result in personal injury or property damage. According to the Airport Land Use Plan, the consideration of airport safety factors has led to the delineation of “safety areas” with respect to aviation safety risks. Please refer to Figure 4.8-3 for a depiction of the airport safety zones as delineated through the ALUP.

The LUCE update is subject to ALUC review to determine consistency with the adopted ALUP and associated land use restrictions. 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, the City Council will need to provide direction to make changes to the project or to determine that an overrule is appropriate. Since one of the major objectives of the Proposed Project is to identify areas for residential infill and development, limiting development through changes to the Proposed Project does not appear to meet the project objectives and hence, changes and development supported by the LUCE update and implementation through the Zoning Code are assumed to represent land use conflicts with the ALUP. However, inconsistency with the ALUP does not indicate an impact to safety or creation of hazardous conditions.

The California Airport Land Use Planning Handbook (Handbook) uses runway protection zones (RPZs) and certain Code of Federal Regulations (CFR) Part 77 surfaces to help delineate recommended safety zones around airports based primarily upon aircraft accident and incident data and runway configuration. The Handbook recognizes that all Part 77 surfaces encompass much more area than is required for safety zones. ALUC’s are tasked with using the Handbook Guidance and considering any local conditions that would require adjustment to the Handbook Zones when developing appropriate provisions in the Airport Land Use Plans developed for the local airport. The Airport Land Use Compatibility Report (Appendix F) prepared by Johnson Aviation has analyzed the Handbook Safety Zone Adjustment Factors as well as current and future airport operations and the airport capital improvements to support them, state and federal regulations, noise and safety hazards and local conditions and determined that no safety zone adjustments from the Handbook recommended zones are required.

In response to this information, the LUCE Update includes Airport policies, programs, and Zoning Code implementation to address safety and noise hazards associated with airport operations. 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, aviation easements, nonconforming uses and reconstruction, and the process for airport compatibility criteria reviews by the City. Compliance with the proposed policies and regulations would ensure that future development under the LUCE Update would not result in significant airport-related safety hazards.
Proposed LUCE Update Development Special Planning 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 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, 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 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.

Proposed Land Use Element Development Special Planning Areas

- **Sunset Drive-In Site:** This site is located near the intersection of Prado Road and Elks Lane, at the southern boundary of the city, just east of Highway 101. The consideration of future mixed use development in this area, as envisioned under the 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; This area is more than one nautical mile from the end of an active runway and therefore is allowed up to 75 persons per acre in non-residential intensity in the ALUP-defined Safety Zone 1B. Proposed 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 and has the potential, if not addressed, to result in safety hazards for people residing or working in the area. Proposed implementation locates a portion of this area within proposed Airport Overlay Zone 4 (corresponding with Handbook Safety Zone 4) which allows non-residential development intensity of up to 200 persons per acre. Uses that have the potential to be incompatible with this outer approach/departure zone are identified as prohibited. Examples of such uses include larger public assembly uses, schools, industrial research and development uses (potential for hazardous materials or processes), service stations, residential dwellings and day care facilities. The remainder of the area is located within AOZ 6 (corresponding with Handbook Safety Zone 6) and all uses described in the underlying zoning are allowed without limitation to density or intensity. Notification of overflight and noise associated with airport operations will be required in this area.

- **Broad Street @ Tank Farm Road Site:** This site is located to the west of the Marigold Shopping Center and to the north of the mixed use commercial/office development adjacent to the Shell Station. Future mixed use development envisioned under the LUCE Update has the potential to introduce incompatible residential and commercial land uses into ALUP identified Safety Zone 1C (with a small portion in Safety Zone 2) which limits non-residential development intensity to 50 persons/acre. The proposed changes and development described in the LUCE update and through Zoning Code implementation locates this area in proposed Airport Overlay Zone 6 (corresponding to Handbook Safety Zone 6) which does not limit non-residential intensity or residential density but requires notification of overflight and noise associated with airport operations.

Proposed Circulation Element Street Network Changes

- **Prado Road Interchange vs. Overpass:** The location of a potential Highway 101 interchange or overpass in this area, located at the southern boundary of the city potentially connecting Prado Road (east of the Highway) to the area near San Luis Ranch, Dalidio Drive and the Promenade Shopping Center (west of the Highway), has the
potential to 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.

The potential impacts related to implementation of the above development area projects and street network changes would be considered significant, however, incorporation of the LUCE Update policies and existing City policies discussed below would reduce impacts to less than significant levels.

Proposed Land Use Element Specific Plan Areas

- **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 ALUP designates most of this property in Safety Zone 1B which allows only 0.2 dwelling units per acre (1 dwelling unit per 5 acres). A small portion, perhaps 16 acres, is located in Safety Zone 2 which 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 the San Luis Ranch property contains one of the designated open space areas in the ACOS. The ALUP allows increases in density under certain circumstances (use of a detailed area plan and clustered development plan), however, even if residential density is maximized by use of these techniques, residential density envisioned in the Proposed Project exceeds that considered as potentially compatible under the ALUP. In addition, non-residential intensity envisioned in the Proposed Project has the potential to exceed the 50-75 persons per acre considered to be compatible in the ALUP for Safety Zone 1B, and with the 150 persons per acre in Safety Zone 2.

  Development of new residential uses in this area fall within the ALUP-identified 55 dB CNEL noise contour which would not be consistent with Table 5.3 of the ALUP.

  The proposed changes and development described in the LUCE update and through Zoning Code implementation locates this area in proposed Airport Overlay Zones 4 and 6 (corresponding to Handbook Safety Zones 4 and 6) for approximately 1/3 of the property adjacent to Highway 101. The remainder of the property (91 acres) is located outside of the proposed Airport Overlay Zone entirely. Draft performance standards for the property indicate a large percentage of open space to be retained for agricultural use (around 50%) and indicate that land uses shall be in keeping with the safety parameters described in the proposed LUCE update or other applicable regulations.

  The bulk of the proposed development is anticipated to be clustered outside of the Airport Overlay Zones with some non-residential development and circulation infrastructure located in proposed Airport Overlay Zone 4 (AOZ 4). AOZ 4 allows non-residential development intensity of up to 200 persons per acre. Uses that have the potential to be incompatible with this outer approach/departure zone are identified as prohibited. Examples of such uses include larger public assembly uses, schools, industrial research and development uses (potential for hazardous materials or processes), service stations, residential dwellings and day care facilities.

  Compliance with the proposed policies and regulations, including use limitations and overflight notification and aviation easements will ensure that future development under the LUCE Update would not result in significant airport-related safety hazards.

- **Madonna on Los Osos Valley Road Specific Plan Area**

  This site is located directly west of the intersection of Los Osos Valley Road and Calle Joaquin. The property falls mostly within Safety Zone 2 of the ALUP with a small portion close to Los Osos Valley Road located within ALUP Zones 1B (3 acres) and 1C (4 acres). 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 ALUP Safety Zone 2; and between 50-75 persons/acre in Safety Zone 1B/1C. There are approximately 7 acres of property within ALUP 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. Compliance with the proposed policies and regulations would ensure that future development under the LUCE Update would not result in significant airport-related safety hazards.

**Avila Ranch Specific Plan Area**

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 project description. 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 Airport Compatible Open Space (ACOS) plan) result in nearly 1,128 dwelling units allowed on the 94 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 ALUP Safety Zones 1B and 1C.

Portions of the site fall within the ALUP-identified 55 dB CNEL noise contour which would not support new residential development under Table 5.3 of the ALUP.

The proposed changes and development described in the LUCE update and through Zoning Code implementation locates this area in proposed Airport Overlay Zones 4 and 6 (corresponding to Handbook Safety Zones 4 and 6). 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 and 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. While some residential development is proposed in AOZ 4, residential uses have the potential to be incompatible with this outer approach/departure zone and are identified as prohibited in the proposed Zoning Code unless they are replacement dwellings or infill lots in existing residential subdivisions.

Compliance with the proposed policies and regulations, including use limitations, aviation easements, and overflight notification will ensure that future development under the LUCE Update would not result in significant airport-related safety hazards.

**South Broad Street Special Planning Area**

The South Broad Street Area encompasses approximately 86 acres and is bounded by the Broad Street on the west, the Union Pacific Railroad on the east, High Street to the north, and Orcutt Road to the south. This area is located in the urbanized core of the city and 82 acres in the southern part of the Area Plan is within the ALUP designated Safety Area S-2. The anticipated density envisioned in this area with mixed residential and commercial uses is approximately 589 dwellings and an increased capacity of 230,000 sq. ft. of non-residential development. This appears to be consistent with the ALUP; however, individual parcels may exceed the residential density of 12 units per acre and the non-residential intensity of 150 persons per acre.
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. Therefore, compliance with either the ALUP or the proposed policies and regulations will ensure that future development under the LUCE Update would not result in significant airport-related safety hazards.

**Applicable LUCE Update Policies**

The General Plan Land Use Element Update draft includes edits to existing policies and programs to protect people residing or working in areas that are in the San Luis Obispo Airport flight path (policy language edited as part of the LUCE Update is shown using “strikeout and underline” format), while some existing language was retained after critical review:

**7.3.3 Airport Land Use Plan.** Land use density and intensity shall carefully balance noise impacts and the progression in the degree of reduced safety risk further away from the runways, consistent with California Airport Land Use Planning Handbook guidelines. The City shall use the Airport Master Plan forecasts of aviation activity as a reasonably foreseeable projection of ultimate aviation activity sufficient for long-term land use planning purposes. Development should be permitted only if it is consistent with the San Luis Obispo County Airport Land Use Plan. Prospective buyers of property which is subject to airport influence should be so informed.

**New Program 7.14 Airport Overlay Zone.** The City shall create an Airport Overlay Zone category to codify airport compatibility criteria identified in the general plan for those areas located within the Airport Influence Area consistent with the requirements of the California State Aeronautics Act (Cal.Pub. Utilities Code, Section 21670, et. seq.) which establishes statewide requirements for airport land use compatibility planning, the California Airport Land Use Planning Handbook, which is published by the California Department of Transportation Division of Aeronautics to support and amplify the State Aeronautics Act requirements, and other related federal and state requirements relating to airport land use compatibility planning. Implementation of the compatibility policies will be accomplished through the Airport Land Use and Zoning Code.

**New Program 7.15 Airport Land Use and Zoning Code.** The City shall update its Zoning Regulations to address allowable uses and development standards for areas located within the Airport Influence Area consistent with the requirements of the State Aeronautics Act, Caltrans Handbook and related state and federal requirements relating to airport land use compatibility. These development standards will include, but not be limited to, intensity and density limitations, identification of prohibited uses, infill development, height limitations and other hazards to flight, noise insulation requirements, buyer awareness measures, nonconforming uses and reconstruction and the process for airport compatibility criteria reviews by the City consistent these development standards.

**New Policy Airport Safety Zones.** Airport Safety Zones shall be consistent with California Airport Land Use Planning Handbook guidelines and substantiated by the San Luis Obispo County Airport Master Plan activity forecasts as used for noise planning purposes.

**New Policy Airport Noise Compatibility.** The City shall use the aircraft noise analysis prepared for the Airport Master Plan Environmental Impact Report 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 shall use the 60 dBA CNEL aircraft noise contour (FAA and State aircraft noise planning standard) as the threshold for new urban residential areas. Interiors of new residential structures shall be constructed to meet a maximum 45 dBA CNEL.

The General Plan Circulation Element Update lists policies aimed to protect people residing or working in areas that are in the San Luis Obispo Airport flight path which include:

**11.0.1 County Aircraft Operations.** The City shall work with the County to continue to appropriately address aircraft operations so that noise and safety problems are not created in developed areas or areas targeted for future development by the City’s Land Use Element.

**11.1.1 Environmentally Sensitive Aircraft.** The City shall work with the County Airport Land Use Commission to encourage the use of quieter and more environmentally sensitive aircraft.
Draft LUCE Program EIR

11.1.4 Update of the Airport Land Use Plan. The City shall encourage work with the County Airport Land Use Commission to complete its update of the Airport Land Use Plan for the San Luis Obispo County Airport in regard to significant changes in noise, adjacent land impacts, and safety zones.

Applicable Existing City Policies

The existing General Plan Conservation and Open Space Element (2006) lists policies to protect people residing or working in areas that are in the San Luis Obispo Airport flight path which include:

8.3.3 Open space for safety. Secure open space where development would be unsafe. Generally, the following locations are considered to be unsafe:

A. Areas within the most restrictive aviation safety zone as defined in the Airport Land Use Plan.
B. Land straddling active or potentially active earthquake faults.
C. Land where risks of ground shaking, slope instability, settlement, or liquefaction cannot be adequately mitigated.
D. Areas subject to flooding, where the frequency, depth, or velocity of floodwaters poses an unacceptable risk to life, health, or property.
E. Areas of high or extreme wildland fire hazard.

The existing General Plan Safety Element lists a policy to protect people residing or working in areas that are affected by operations at the San Luis Obispo Airport. The discussion indicates that there are inconsistencies between the Land Use Element and the Airport Land Use Plan.

7.0 Policy: Airport Land Use Plan. Development should be permitted only if it is consistent with the San Luis Obispo County Airport Land Use Plan. Prospective buyers of property that is subject to airport influence should be so informed.

This policy will need to be updated to be consistent with the updated language in Chapter 7 of the Land Use Element.

Adherence to the existing City’s General Plan, the proposed LUCE Update, coordination with the ALUC, will ensure that future development under the LUCE Update will not result in significant airport-related safety hazards. No additional policy direction is required. Individual development would be required to undergo separate environmental review, which may result in specific impacts that require project specific mitigation consistent with these policies.

Mitigation Measures

Development consistent with the proposed LUCE Update could introduce incompatible residential and commercial land uses into safety zones identified in the Airport Land Use Plan and may result in a safety hazard for people residing or working in these areas. However, the proposed and existing City policies and programs and Zoning Code implementation discussed above directly address future development with the potential to airport-related safety hazards. 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 and implementation listed above. As such, with the incorporation of the proposed project and adherence to existing City policies and programs discussed above, additional mitigation is not required.

Significance After Mitigation

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.

Impact HAZ-3

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.
Buildout of the LUCE Update would facilitate the development of residential uses in areas of the city that are at risk of damage from wildland fires. As described in the setting section above and illustrated on Figure 4.8-1, the northern portion of the city, consisting of the land surrounding Via Carta and Poly Canyon Road and along the north-eastern edge behind Cal Poly State University is a High to Very High Fire Hazard area. The southeast quadrant of the intersection of Highway 1 and Highway 101 directly east of the French Hospital Medical Center is also designated as a High Fire Hazard area. In addition, Moderate Fire Hazard Areas are located along the southern portion of the city along the Planning Area boundary line between Highway 101 and Highway 227. Development of vacant and/or underutilized parcels in these areas has the potential to result in an increased risk of exposure to wildland fires. The Uniform Fire Code (UFC) and the California Building Code (CBC) set construction requirements for residences and structures in wildland fire hazard areas. Compliance with these requirements would minimize risks associated with development in these areas. Compliance with General Plan policies would further reduce the risks in these areas.

The remainder of the urbanized city, as well as the remainder of the area within the Planning Area boundary line has a low/moderate potential for wildland fires. However, seep hills covered with brush and grasslands surround San Luis Obispo, and during fire season areas within the city limits are susceptible to wildfire damage if these fires cannot be prevented or controlled. The City has adopted fire safety standards relating to road standards for fire equipment access, standards for signs identifying streets, roads, and buildings, minimum private water supply reserves for emergency fire use, and fuel breaks and greenbelts as outlined in the California Public Resources Code Section 4290 and Section 4291. These standards apply to all development outside of the incorporated city, and would help to reduce the risk of wildfires spreading and impacting the city.

The proposed Airport overlay zone and compatibility criteria changes would not, in and of themselves, result in an environmental impact. However, future development in areas under the given safety zones could result in impacts and are discussed here in relation to the general development anticipated under the LUCE Update.

Proposed LUCE Update Development Special Planning 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 development into areas designated as Moderate or High Wildland Fire Hazard, introducing the potential to expose people or structures to a significant risk of loss and/or injury, 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 development into areas designated as Moderate or High Wildland Fire Hazard.

Proposed Land Use Element Development Special Planning Areas

- **General Hospital Site:** This area is located along the eastern boundary of the city, near the intersection of Johnson Avenue and Bishop Street and represents an urban/wildland interface with the hillsides and designated Open Space to the east. Future residential development in this area, as envisioned under the LUCE Update, could introduce new development into areas designated as Moderate Wildland Fire Hazard, introducing the potential to expose people or structures to a significant risk of loss and/or injury;

- **Pacific Beach Site:** This site is located adjacent to the Prefumo Creek Commons shopping center, on Los Osos Valley Road, just south of the Madonna Road intersection. The site currently supports the Pacific Beach continuation school. Future Commercial Retail development of this site could introduce new development into areas designated as Moderate Wildland Fire Hazard, introducing the potential to expose people or structures to a significant risk of loss and/or injury;
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 site is primarily undeveloped and serves as a gateway to designated Open Space to the west. Future residential development in this area, as envisioned under the LUCE Update, would introduce new development into areas designated as Moderate Wildland Fire Hazard, introducing the potential to expose people or structures to a significant risk of loss and/or injury;

The potential Wildland Fire Hazard impacts related to implementation of the above development area projects and street network changes would be considered significant, however, incorporation of the LUCE Update policies and existing City policies discussed below would reduce impacts to less than significant levels.

Proposed Land Use Element Specific Plan Areas

San Luis Ranch Specific Plan Area
This area is located in the southwest quarter of the city at the corner of Madonna Road and Dalidio Drive and is characterized primarily by its use as an agricultural property which is mainly undeveloped with the exception of a relatively small amount of agricultural support structures. This portion of the site includes a mature stand of tall eucalyptus trees which, although not connected to outlying wildland areas, has the potential to present fire fuel risks and vertical fire ladder structure that can increase potential fire intensity.

The San Luis Ranch Specific Plan Area is designated as Moderate Wildland Fire Hazard Areas. As such, future development of the site could be exposed to potential wildland fire hazards. However, compliance with applicable UFC, CBC and General Plan policies would reduce the risk of injury or damage from wildland fires to a less than significant level.

Madonna on Los Osos Valley Road Specific Plan Area
This site is located directly west of the intersection of Los Osos Valley Road and Calle Joaquin and is characterized by its use as an agricultural property which is mainly undeveloped with the exception of a small amount of agricultural support structures and a Madonna Construction office.

The site is designated as Moderate and High Wildland Fire Hazard Areas due primarily to its location along the fringe of the city, within the wildland/urban area interface. Future development and human occupation could therefore be exposed to potential wildland fire hazards. However, compliance with applicable UFC, CBC and General Plan policies would reduce the risk of injury or damage from wildland fires to a less than significant level.

Avila Ranch Specific Plan Area
This site is located on the north side of Buckley Road at the far southern edge of the city and includes some existing buildings along the north and west consisting of service and manufacturing uses with the remainder of the site undeveloped and used for agriculture (livestock grazing).

The Avila Ranch Specific Plan Area is designated as a Moderate Wildland Fire Hazard Area. Future development and potential human occupation could therefore be exposed to potential wildland fire hazards. However, compliance with applicable UFC, CBC and General Plan policies would reduce the risk of injury or damage from wildland fires to a less than significant level.

South Broad Street Special Planning Area
The South Broad Street Area is located in the urban core of the city, which is an existing developed area surrounded by a primarily urban environment. These urbanized areas have a low potential for wildland fires. Compliance with the requirements of the UFC, CBC, and General Plan policies would reduce the risk of injury or damage from wildland fires to a less than significant level.
Applicable LUCE Update Policies

The General Plan Land Use Element Update includes goals, policies and programs to address impacts related to the areas designated as Moderate or High Wildland Fire Hazard. The following policies address potential impacts related to the addition of new development located in this designation.

- 6.2.6 Homesites Outside the Limit Lines;

Please refer to the policy discussion under Impact HAZ-1 for the full text of the policies and programs listed above. In addition to implementation of these policies and programs, the following Land Use Element Update policies and programs address the potential for the addition of new development in areas designated as Moderate or High Wildland Fire Hazard.

6.2 Hillside Policies [RELEVANT PORTION]

6.2.1 The City shall maintain comprehensive standards and policies for hillside development for the following reasons:

To protect and preserve scenic hillside areas and natural features such as the volcanic Morros, ridge lines, plant communities, rock outcroppings and steep slope areas that function as landscape backdrops for the community.

To set the limits of commercial and residential development in hillside areas by establishing a permanent open space green belt at the edge of the community.

To protect the health, safety and welfare of community residents by directing development away from areas with hazards such as landslides, wildland fires, flooding and erosion.

6.2.2 Development Limits. The City shall establish and maintain clear development limit lines for hillside planning areas. These development limit lines shall have carefully chosen development limit lines, and special design standards for the hillside areas which can be developed. The location of the development limit line and the standards should cause development to avoid encroachment into sensitive habitats or unique resources as defined in the Conservation and Open Space Element, and public health and safety problems related to utility service, access, wildland fire hazard, erosion, flooding, and landslides and other geologic hazards. Also, the development limit line and the standards should help protect the City’s scenic setting. (Locations of hillside planning areas are shown in Figure 6. More precise locations of the development limit line and the urban reserve line are shown on large scale aerial photographs on file at the Community Development Department; these are part of the Land Use Element.)

Applicable Existing City Policies

The existing General Plan Conservation and Open Space Element (2006) lists goals, policies and programs aimed to protect areas designated as Moderate or High Wildland Fire Hazard. The following policies and goals address potential impacts in areas designated as Moderate or High Wildland Fire Hazard and are discussed in detail under Impact HAZ-2:

- 8.3.3 Open space for safety.

The existing General Plan Safety Element (2006) lists policies to protect areas designated as Moderate or High Wildland Fire Hazard which include:

Policy 3.0: Adequate Fire Services. 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.

Policy 3.1: Wildland Fire Safety

F. Wildland fire hazard severity zones shall be classified as prescribed by Cal Fire. Areas within the City, including “Very High” Fire Hazard Severity Zones, if any, shall be classified by the City’s Fire Code Official based on findings supported by substantial evidence in the record as required by Government Code Section 51179 and considered by City Council at a public hearing. Meaningful, early notification and input shall be obtained from nearby neighborhoods which may be affected.

G. New subdivisions shall be prohibited in areas of “Very High” wildland fire hazard as shown in Figure 2 unless part of conservation or open space acquisition program. Development of existing parcels shall
require a development plan to manage fuels, maintain a buffer zone, and provide adequate fire protection to the approval of the Chief Building Official. The development plan must be consistent with Policies required by the City’s Conservation and Open Space Element.

H. The City of San Luis Obispo is considered a “Community at Risk” due to the threat of wildfire impacting the urban community. The City shall continue to enhance the fire safety and construction codes for new buildings in order to reduce the risk of urban fires that may result from wildfires. Citywide building code enhancements should include: Fire resistant exterior wall coverings; Sprinkler protection in attic areas; and Ember resistant vent systems for attics and under floor areas and other provisions identified in the California Building Code Chapter 7A.

In addition to the policies and programs listed above, the General Plan Safety Element includes a comprehensive set of policies and programs intended to address wildland fire hazards. This includes programs and requirements intended to avoid several kinds of emergencies and to respond to those that occur. As shown below, this is an extensive list and it is the intent of this EIR analysis to incorporate the details of the following policies by reference:

10.1 Policy S: Emergency Preparedness and Response
10.3 Program S: Response Performance Standards
10.5 Program S: Specific Emergency-Response Information
10.6 Program S: Coordinated Emergency Planning
10.7 Program S: Emergency Operations Center
10.9 Program S: City Emergency Plan
10.10 Program S: Mutual and Automatic Aid
10.13 Policy S: Emergency Access and Evacuation
10.18 Policy S: Safety of Structures and Facilities
10.19 Program S: Reducing Structural Hazards
10.22 Program S: Building and Fire Regulations
10.23 Program S: Required Inspections

Adherence to the existing City’s General Plan, the proposed LUCE Update, compliance with the requirements of the UFC, and CBC, will reduce the risk of injury or damage from wildland fires to a less than significant level. No additional policy direction is required. Individual development will be required to undergo separate environmental review, which may result in specific impacts that require project specific mitigation consistent with these policies.

Mitigation Measures
Development consistent with the proposed LUCE Update would introduce residential land uses into areas designated as Moderate or High Wildland Fire Hazard, introducing the potential to expose people or structures to a significant risk of loss and/or injury. However, the proposed and existing City policies and programs discussed above directly address future development in areas designated as Moderate or High Wildland Fire Hazard. 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. As such, with the incorporation of the proposed project and adherence to existing City policies and programs discussed above, additional mitigation is not required.

Significance After Mitigation
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.
Radiation Hazards: Ionizing radiation damages tissues at the molecular and genetic levels, causing a host of illnesses and reproductive problems. The Diablo Canyon Nuclear Power Plant is the primary hazard for ionizing radiation in the San Luis Obispo area. Risks result from the potential for mistakes during day-to-day operations, accidents associated with refueling, and damage from earthquakes or other causes. There is added risk from on-site storage of spent fuel that remains radioactive for several generations. Long-term, off-site storage facilities for spent fuel are not available. A release of radioactive material could seriously damage health and make property unusable.

The U.S. Nuclear Regulatory Commission (NRC) is an independent agency established by the Energy Reorganization Act of 1974 to regulate the civilian use of nuclear materials. The NRC is responsible for oversight and licensing of all commercial power, research, and test reactors, as well as the use of nuclear materials in the United States. The NRC has pre-emptive jurisdiction over State and local regulations regarding the use, storage and transport of nuclear materials and protection of public safety. The NRC administers the site-specific license for Diablo Canyon Power Plan Units 1 and 2, according to the requirements of 10 CFR 50, Domestic Licensing of Production and Utilization Facilities. These regulations are put forth by the NRC pursuant to the Atomic Energy Act of 1954, as amended (68 Stat. 919), and Title II of the Energy Reorganization Act of 1974 (88 Stat. 1242).

The State of California Nuclear Power Plant Emergency Response Plan sets forth emergency response procedures in the event of an accident at a nuclear power plant in the state. Emergency planning at the Diablo Canyon facility is coordinated with the Emergency Services Director from the Office of the County Administer. There are no regulations or restrictions on development in the City planning area that result from the existence of the plant.

In addition, the state Department of Health Services (DHS) provides oversight and guidance on many health related issues. These issues include standards for monitoring potential radiological releases, and providing policies and guidance on protective guidelines such as issuing Potassium Iodine (often referred to by its chemical component identifier “KI”) for emergency workers or the public (KI can block radioactive iodine from being absorbed into the thyroid gland).

Locally, the response plan for an emergency at the Diablo Canyon Nuclear Power Plant is contained in a document called the County/Cities Nuclear Power Plant Emergency Response Plan. Updated information on the Emergency Response Plan is distributed to the public each year, as required by federal law.

Implementation of the LUCE Update would have the potential to introduce residents to regional hazards associated with a radiation leak at Diablo Canyon Nuclear Power Plant. Incorporation of the Federal and State requirements discussed above, along with the local response plan implemented by the County and City of San Luis Obispo will reduce impacts related to radiation hazards to less than significant levels.

Electromagnetic Field Hazards: Pacific Gas and Electric Company (PG&E) provides the City San Luis Obispo with electricity through a series of electrical lines. The City General Plan Safety Element identifies these power lines as 115 kilovolt (kV) transmission lines (Refer to Figure 4.8-2).

Power lines emit very low levels of radiant energy. As a result, electric fields produce very little biological effects because these fields are not strong enough to penetrate through structures or even human skin. However, it is the development of magnetic fields by electric currents that have the potential to affect biological systems. In general, magnetic fields are elevated in structures near power lines whereas electrical fields are not.

The California Department of Health Services has recommended that, until information is available to make better-informed decisions about possible health effects due to long-term EMF exposure, people and local governments should consider keeping schools, dwellings, and workplaces away from high-voltage power transmission lines. With this approach, exposure to strong EMF’s would be avoided through location choices when it is practical to do so.
In order to implement safety standards at the local level, policies have been adopted by the City of San Luis Obispo through the General Plan Safety Element (see discussion below). Implementation of these policies will reduce impacts related to exposure to electromagnetic fields are reduced to less than significant levels.

**Hazardous Trees:** Trees help make San Luis Obispo attractive for people and wildlife. However, as trees age, particularly massive or tall ones, they pose a risk from dropping limbs or toppling. Strong winds, and saturated soils or erosion around roots, contribute to the hazard. Falling branches or whole trees can harm people, damage property, and interrupt access, storm runoff, and power and communications. Particularly for some types of pines in the San Luis Obispo area, pitch canker is killing trees in a relatively short time. The weakened or dead trees increase the hazard.

The City trims trees along streets and on City parks and grounds, with safety as one objective. The City also notifies property owners of hazardous trees, and works with owners, the local flood control district, and State programs to deal with trees along creeks. In addition, the General Plan Safety Element includes policies and programs to minimize danger to people and property from trees that are weakened and susceptible to falling or limb loss during storms.

Implementation of the City’s policies and programs (refer to the policy discussion below) will reduce safety impacts to less than significant levels.

**Proposed LUCE Update Development Special Planning 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 have the potential to result in significant impacts related to the introduction of new development near potential radiation hazards, electromagnetic fields and tree hazards, 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.

The impacts related to radiation, electromagnetic fields and hazardous trees are considered regional impacts potentially affecting all of the potential development areas and project sites. Future implementation of each the proposed development area projects and street network changes outlined in the Project Description would have the potential to result in significant impacts, however, incorporation of the LUCE Update policies and existing City policies discussed below would reduce impacts to less than significant levels.

**Proposed Land Use Element Specific Plan Areas**

- **San Luis Ranch Specific Plan Area**

  This area is located in the southwest quarter of the city at the corner of Madonna Road and Dalidio Drive and is characterized primarily by its use as an agricultural property which is mainly undeveloped with the exception of a small amount of agricultural support development. The San Luis Ranch Specific Plan Area is currently in agricultural production. The site also supports a mature stand of non-native eucalyptus trees associated with the farming complex. Future development under the proposed LUCE Update could introduce residents, employees or visitors to tree hazards. Although there are overhead transmission lines in the site vicinity, they are not close enough to pose a risk associated with EMF. Radiation hazards associated with Diablo Canyon Nuclear Power Plant are region-wide.

- **Madonna on Los Osos Valley Road Specific Plan Area**

  This site is located directly west of the intersection of Los Osos Valley Road and Calle Joaquin and is characterized primarily by its use as an agricultural property which is mainly undeveloped with the exception of some agricultural support development and offices associated with Madonna Construction.

  Future development under the proposed LUCE Update could introduce residents, employees or visitors to tree hazards through existing or future landscape trees. Although there are overhead transmission lines in the site vicinity, they are not close enough to pose a risk associated with EMF. Radiation hazards associated with Diablo Canyon Nuclear Power Plant are region-wide.
### Avila Ranch Specific Plan Area

This site is located on the north side of Buckley Road at the far southern edge of the city. The site is characterized by some service and manufacturing development, with the majority of the site undeveloped and used for agriculture (primarily livestock grazing). There are no records of previous or existing sources of contamination in this area.

Future development under the proposed LUCE Update could introduce residents, employees or visitors to tree hazards through existing or future landscape trees. Although there are overhead transmission lines in the site vicinity, they are not close enough to pose a risk associated with EMF. Radiation hazards associated with Diablo Canyon Nuclear Power Plant are region-wide.

### South Broad Street Special Planning Area

The South Broad Street Area encompasses approximately 86 acres and is bounded by Broad Street on the west, the Union Pacific Railroad on the east, High Street to the north, and Orcutt Road to the south. The South Broad Street Special Planning Area is located in the urbanized core of the city, in an existing developed environment. Future development under the proposed LUCE Update could introduce residents, employees or visitors to tree hazards through existing or future landscape trees. Although there are overhead transmission lines in the site vicinity, they are not close enough to pose a risk associated with EMF. Radiation hazards associated with Diablo Canyon Nuclear Power Plant are region-wide.

The impacts related to radiation, electromagnetic fields and hazardous trees are considered regional impacts potentially affecting all of the Specific Plan Areas. Future implementation of each the Specific Plans outlined in the Project Description would have the potential to result in significant impacts, however, compliance with current federal and state requirements, incorporation of the LUCE Update policies and existing City policies discussed below would reduce impacts to less than significant levels.

#### Applicable LUCE Update Policies

The General Plan Land Use Element Update draft includes edits to existing policies and programs for development in proximity to known hazards discussed above. Specifically, implementation of LUCE Update policy 12.3.11 Environmental Review will require appropriate studies of proposed development projects with the potential to result in impacts. Refer to the discussion under Impact HAZ-1 for the full text of this policy.

#### Applicable Existing City Policies

The existing General Plan Safety Element (2006) lists policies for development with the potential to expose sensitive receptors to radiation, EMR or hazardous trees which include:

- **7.0 Policy S: Exposure to Electromagnetic Fields.** Land-use decisions should avoid prolonged exposure of people to strong electromagnetic fields. Appropriate uses for areas under or next to high-voltage power transmission lines are agriculture, floodwater detention, roads, parking, materials storage, and parks and greenways with low-intensity use. Residential yards may be located along but outside of high-voltage power transmission line easements. School buildings and playgrounds, residential buildings, and work places should be set back from high-voltage power transmission lines. The amount of setback will be a matter of judgment, considering the space available in which to locate uses within the site being planned.

- **7.1 Policy S: Notification to Buyers Near Electromagnetic Fields.** When land containing major sources of electromagnetic fields, such as power transmission lines, is subdivided, the City will determine if a condition will be imposed requiring notification of prospective buyers that a source of electromagnetic fields exists and that studies have raised concerns about long-term exposure.

- **9.0 Policy S: Hazardous Trees.** Minimize danger to people and property from trees that are weakened and susceptible to falling or limb loss during storms.

- **9.1 Program S: Hazardous Trees.** The City will identify, and maintain or remove, trees on City property to minimize hazards, and will work with property owners to do the same.
In addition to the policies and programs listed above, the General Plan Safety Element includes a comprehensive set of policies and programs intended to address avoiding and preparing for emergencies in general. This includes programs and requirements intended to avoid several kinds of emergencies and to respond to those that occur. As shown below, this is an extensive list and it is the intent of this EIR analysis to incorporate the details of the following policies by reference:

10.0 Policy S: Avoiding and Mitigating Hazards [reworded from the Open Space Element]
10.1 Policy S: Emergency Preparedness and Response
10.2 Program S: City Activities
10.4 Program S: Staff Training
10.5 Program S: Specific Emergency-Response Information
10.6 Program S: Coordinated Emergency Planning
10.7 Program S: Emergency Operations Center
10.8 Program S: Information and Planning Updates
10.9 Program S: City Emergency Plan

Adherence to the existing City’s General Plan, the proposed LUCE Update, incorporation of the Federal and State requirements discussed above, along with the local response plan implemented by the County and City of San Luis Obispo will ensure that development near radiation sources, EMF and hazardous trees will remain a less than significant impact. No additional policy direction would be required. Individual development would be required to undergo separate environmental review, which may result in specific impacts that require project specific mitigation consistent with these policies.

Mitigation Measures
The impacts related to radiation, electromagnetic fields and hazardous trees are considered regional impacts potentially affecting all of the development anticipated under the LUCE Update. Future implementation of the LUCE Update would have the potential to result in significant impacts, however, the proposed and existing City policies and programs discussed above directly address future development with the potential to result in these hazardous conditions through avoidance and preparation and through Federal, State and local regulations. 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. As such, with the incorporation of the proposed project and adherence to existing City policies and programs discussed above, additional mitigation is not required.

Significance After Mitigation
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.

Impact HAZ-5

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.

No major hazardous materials spills or other major such accidents along the Union Pacific Railroad (UPRR) corridor or highways that traverse the LUCE SOI Planning Subarea have occurred to date. The transport of hazardous materials on the existing UPRR rail corridor that traverses the city in a general north-south direction is not prohibited. While railroad accidents related to hazardous materials spills are not anticipated, railroad accidents are a possibility. Specifically,
development along the railroad tracks would be most susceptible to hazardous materials impacts associated with railway accidents. Hazardous materials could potentially be transported along Highway 101 through the city. Development along Highway 101 would be most susceptible to hazardous materials impacts associated with highway accidents. Impacts to new development are considered potentially significant, however, if the policies and programs discussed below are implemented, impacts related to hazards from rail and highway accidents and the transportation of hazardous materials within the city would be reduced to a less than significant level.

Proposed LUCE Update Development Special Planning 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 listed below have the potential to result in significant impacts related to the transportation of hazardous materials, 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.

Implementation of the proposed street network changes and circulation improvements would not include human habitation in proximity to hazardous materials transportation corridors. Future implementation of the following proposed development area projects would have the potential to result in significant impacts related to the transportation of hazardous materials.

Proposed Land Use Element Development Special Planning Areas

- **Caltrans Site:** This area is located near the Marsh Street off-ramp on Highway 101, at the intersection of Higuera Street and Marsh Street. Because this site is located in proximity to a major transportation corridor, there is a potential for risks associated with the transportation of hazardous materials. Future mixed use development in this area, as envisioned under the LUCE Update, could expose individuals to health risks due to the site location in proximity to Highway 101;

- **Sunset Drive-In Site:** This site is located near the intersection of Prado Road and Elks Lane, at the southern boundary of the city, just east of Highway 101. Because this site is located in proximity to a major transportation corridor, there is a potential for risks associated with the transportation of hazardous materials. Future mixed use development in this area, as envisioned under the LUCE Update, could expose individuals to health risks due to the site location in proximity to Highway 101;

- **Calle Joaquin Auto Sales Area:** This portion of Calle Joaquin is parallel to and west of Highway 101, south of the city, and is adjacent to the San Luis Ranch Specific Plan area. Because this site is located in proximity to a major transportation corridor, there is a potential for risks associated with the transportation of hazardous materials. Future mixed use development in this area, as envisioned under the LUCE Update, could expose individuals to health risks due to the site location in proximity to Highway 101;

The potential impacts related to implementation of the above development area projects would be considered significant; however, incorporation of the LUCE Update policies and existing City policies discussed below would reduce impacts to less than significant levels.

Proposed Land Use Element Specific Plan Areas

- **San Luis Ranch Specific Plan Area**
  This area is located in the southwest quarter of the city at the corner of Madonna Road and Dalidio Drive, adjacent to Highway 101 and is characterized primarily by its use as an agricultural property which is mainly undeveloped with the exception of a small amount of agricultural support development. The San Luis Ranch Specific Plan Area is currently in agricultural production. Because this site is located in proximity to a major transportation corridor, there is a potential for risks associated with the transportation of hazardous materials. Future mixed use development in this area, as envisioned under the LUCE Update, could expose individuals to health risks due to the site location in proximity to Highway 101.
Madonna on Los Osos Valley Road Specific Plan Area

This site is located directly west of the intersection of Los Osos Valley Road and Calle Joaquin and is characterized primarily by its use as an agricultural property which is mainly undeveloped with the exception of some agricultural support development and offices associated with Madonna Construction.

Future development under the proposed LUCE Update, although close to Highway 101, is not in direct proximity to the highway such that a possible accident involving hazardous materials spills would not directly impact future residents, workers or visitors to the site.

Avila Ranch Specific Plan Area

This site is located on the north side of Buckley Road at the far southern edge of the city. The site is characterized by some service and manufacturing development, with the majority of the site undeveloped and used for agriculture (primarily livestock grazing). There are no records of previous or existing sources of contamination in this area.

Future development under the proposed LUCE Update is not in direct proximity to either the UPRR line or Highway 101 and a possible accident involving hazardous materials spills within these transportation corridors would not directly impact future residents, workers or visitors to the site.

South Broad Street Special Planning Area

The South Broad Street Area encompasses approximately 86 acres and is bounded by Broad Street on the west, the Union Pacific Railroad on the east, High Street to the north, and Orcutt Road to the south. The South Broad Street Special Planning Area is located in the urbanized core of the city, in an existing developed environment. Future development under the proposed LUCE Update, although close to the UPRR line, is not in direct proximity to the railroad such that a possible accident involving hazardous materials spills would not directly impact future residents, workers or visitors to the site.

Future implementation of the Specific Plans outlined in the Project Description would have the potential to result in impacts, however, compliance with current federal and state requirements, incorporation of the LUCE Update policies and existing City policies discussed below would reduce impacts to less than significant levels.

Applicable LUCE Update Policies

The General Plan Land Use Element Update draft includes edits to existing policies and programs for development in proximity to known hazards discussed above. Specifically, implementation of LUCE Update policy 12.3.11 Environmental Review will require appropriate studies of proposed development projects with the potential to result in impacts, including potential impacts related to development in direct proximity to hazardous materials transportation corridors. Refer to the discussion under Impact HAZ-1 for the full text of this policy.

Applicable Existing City Policies

The existing General Plan Safety Element (2006) lists policies for development near known hazardous material users, or construction in areas with existing hazardous materials or general hazardous conditions, that could expose individuals to health risks due development in direct proximity to hazardous materials transportation corridors. This includes the following goals and policies (Please refer to the discussion under Impact HAZ-1 for a discussion of the full text of these policies):

- **6.1 Other** Hazardous Materials.

In addition to the policies and programs listed above, the General Plan Safety Element includes a comprehensive set of policies and programs intended to address avoiding and preparing for emergencies in general. This includes programs and requirements intended to avoid several kinds of emergencies and to respond to those that occur. As shown below, this is an extensive list and it is the intent of this EIR analysis to incorporate the details of the following policies by reference:
10.0 Policy S: Avoiding and Mitigating Hazards [reworded from the Open Space Element]
10.1 Policy S: Emergency Preparedness and Response
10.2 Program S: City Activities
10.4 Program S: Staff Training
10.5 Program S: Specific Emergency-Response Information
10.6 Program S: Coordinated Emergency Planning
10.7 Program S: Emergency Operations Center
10.8 Program S: Information and Planning Updates
10.9 Program S: City Emergency Plan

Adherence to the existing City’s General Plan, the proposed LUCE Update, incorporation of the Federal and State requirements discussed above, along with the local response plan implemented by the County and City of San Luis Obispo will ensure that development near hazardous materials transportation corridors will remain a less than significant impact. No additional policy direction would be required. Individual development would be required to undergo separate environmental review, which may result in specific impacts that require project specific mitigation consistent with these policies.

Mitigation Measures
Future implementation of the LUCE Update would have the potential to result in significant impacts, however, the proposed and existing City policies and programs discussed above directly address future development with the potential to result impacts related to hazardous materials transportation corridors through avoidance and preparation and through Federal, State and local regulations. 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. As such, with the incorporation of the proposed project and adherence to existing City policies and programs discussed above, additional mitigation is not required.

Significance After Mitigation
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.

4.8.3 Cumulative Impacts

Cumulative buildout of the LUCE Update includes buildout of areas within existing city boundaries, as well as buildout of the identified expansion areas. Overall, development under the LUCE Update would increase development intensity within the city limits, as well as convert adjacent undeveloped areas to a more built environment, thereby altering the fundamental character of these areas.

As a General Plan Update, cumulative impacts are treated somewhat differently than would be the case for a project-specific development. By its nature, the LUCE Update considers cumulative development within the city and potential expansion areas. Thus, cumulative impacts are generally equivalent to project-specific impacts.

Impacts related to hazards and hazardous materials including development near known hazardous material users, or construction in areas with existing hazardous materials, aircraft overflights, and wildland fires have been addressed individually in the paragraphs above. The combination of these impacts reflects the cumulative impacts of the LUCE Update. As noted above, the existing General Plan, LUCE Update, proper engineering, including compliance with the CBC, the City of San Luis Obispo Municipal Code would protect the health and safety of the San Luis Obispo Community through policies and plan review. Adherence to these requirements would reduce any impacts from buildout, as well as buildout of Specific Plan and Special Planning Areas identified in the LUCE Update to a less than significant level.
Please see the next page.
This section reviews the City of San Luis Obispo LUCE Update for potential impacts with respect to hydrology and water quality. Specifically, impacts resulting from changes to drainage and impacts related to water quality are discussed.

4.9.1. Setting

The purpose of this section is to provide a setting for the city with respect to Hydrology and Water Quality. The setting for the city was discussed in detail in Section 6.9, Hydrology and Water Quality, of the corresponding City of San Luis Obispo General Plan Update Background Report. Please refer to the Background Report, which is incorporated herein by reference, for additional details with respect to the hydrology and water quality setting.

The Background Report reviews the drainage and water quality issues in the City of San Luis Obispo. It describes existing regional hydrology patterns, key drainage features of the city, and local flood issues. It also describes related water quality concerns, and efforts used to improve water quality, both from a physical standpoint, and a regulatory one.

a. Drainage and Flooding

Regional Hydrology and Drainage. According to the Central Coast Regional Water Quality Board (RWQCB), the project site is located within the San Luis Obispo Creek Hydrologic Subarea of the Estero Bay Hydrologic Unit, an area that corresponds to the coastal draining watersheds west of the Coastal Range (RWQCB 1994). The Estero Bay Hydrologic Unit stretches roughly 80 miles between the Santa Maria River and the Monterey County line and includes numerous individual stream systems. Within the Estero Bay Hydrologic Unit, the San Luis Obispo Creek watershed drains approximately 84 square miles. According to the Safety Element of the City of San Luis Obispo General Plan, average seasonal precipitation in the City of San Luis Obispo is 22 inches and average seasonal precipitation throughout the county varies from 8.5 inches (at Simmler) to 25.6 inches (at San Simeon).

The watershed generally drains to the south-southwest via San Luis Obispo Creek where it meets the Pacific Ocean at Avila Beach. San Luis Obispo Creek originates in the Cuesta Grade area north of San Luis Obispo at an elevation of 2,200 feet above mean sea level, in the western slopes of the Santa Lucia Range. The creek flows south through the City of San Luis Obispo adjacent to U.S. Highway 101 until it reaches the southern extent of the Irish Hills where it veers west to the ocean.

Flooding within the San Luis Obispo Creek system is generally caused by intense Pacific storm systems that occur during the months of December, January, February, and March. The great topographic variability of the watershed causes these systems to release large amounts of precipitation, especially along the higher ridgelines. The Irish Hills, located just southwest of the area and cresting at about 1,650 feet in elevation, can experience twice the rainfall observed in the lower portions of the watershed.

Storm Probability. Flood zone mapping and drainage improvements are based on the probability of a certain amount of rain to fall within a particular time frame, usually 24 hours. From rainfall gauge records, the size of a storm that has a one percent probability of occurring in any one year within a particular watershed can be calculated. A storm with this probability is often referred to as the 100-year storm since at least one such storm would be expected to occur in a 100-year period, and the associated overflow termed the 100-year flood.
Local Flood Hazards. The City of San Luis Obispo is generally located within a low-lying valley centered on San Luis Obispo Creek. San Luis Obispo Creek is one of four major drainage features that create flood hazards in the city, with the others being Stenner Creek, Prefumo Creek, and Old Garden Creek. In addition, many minor waterways drain into these creeks, and these can also present flood hazards. Because of the high surrounding hills and mountains in the area, the drainage sheds of these creeks are relatively small, but the steep slopes and high gradient can lead to intense, fast moving flood events in the city.

Flooding occurs in response to heavy rainfall, when creek and drainage channels overflow. Flooding may also occur in low-lying areas that have poor drainage, or when culverts become blocked, even during moderate storms.

San Luis Obispo Creek is partially conveyed through the downtown in an under city culvert. The culvert stretches from Higuera Street and terminates approximately ¼ mile downstream to the open channel at Mission Plaza. The culvert does not have capacity to convey the 100-year storm event. As such, when the culvert capacity is exceeded, stormwater has the potential to back up and overtop the adjoining channel, thus adding to any street flooding that may already be occurring from other sources.

Key areas within the 100-Year Flood Zone include:

- Downtown (especially bounded by Santa Rosa, Monterey, Broad, and Pismo Streets)
- Mid-Higuera Area
- Margins of Laguna Lake and Prefumo Creek

See Figure 4.9-1 for a depiction of existing 100-Year flood zones.

Other Flood Hazards. San Luis Obispo is not subject to inundation from dam failure, beach erosion, or coastal or lakefront flooding due to earthquake-induced waves (tsunami or seiche). However, the Whale Rock pipeline that brings water to the city is potentially subject to damage from tsunami in the vicinity of Cayucos and Morro Bay. Sudden failure of Whale Rock Dam (owned and operated by the Whale Rock Commission) or Salinas Reservoir (owned by the federal government and operated by the County) could cause flooding for communities immediately downstream, and would severely reduce the City’s water supply.

Several large tanks on hillsides around the city store treated water for domestic use and fire suppression. A strong earthquake could damage the tanks. Sudden failure of such a tank, which is very unlikely, would cause localized flooding and erosion immediately downstream from the tank, in addition to interrupting water distribution. The tanks located on the South Hills and on Islay Hill, which were set into the ground partly for aesthetic reasons, pose a minimal hazard.

The City’s Flood Damage Prevention Regulations and Federal Flood Insurance standards require new building floors to be above the 100-year flood level, while not displacing floodwaters in a way that would raise flood levels. They also are intended to keep floating debris and other man-made obstructions out of floodways.

Flood Prevention. The City provides many resources to protect lives and property from floods, and has extensive information on its website about emergency response to flood events. Sandbagging and waterproofing structures are among many approaches described on the site. The City’s Winter Weather Handbook (available online) gives detailed information about sandbags and other flood protection advice. The City also maintains a flood hotline (805-781-RAIN), which provides additional advice and assistance to residents in need of help.
Figure 4.9-1
100-Year Flood Zones

b. Water Quality

The City’s Public Works, Utilities and Community Development Departments are responsible for coordinating the implementation of the City’s Storm Water Management Program (SWMP). This program is required under the Phase II Storm Water Regulations regulated by the SWRCB, San Luis Obispo Region. The primary goal of the program is to minimize urban runoff that enters the municipal storm drain system, and carries bacteria and other pollutants into local creeks, our watershed and to the ocean.

As part of these new requirements, the City of San Luis Obispo has been mandated to establish a set of minimum-designated Best Management Practices (BMPs) and Pollution Prevention Methods (PPMs). BMPs are steps taken to minimize or control the amount of pollutants and runoff. PPMs are strategies to eliminate the use of polluting materials, and/or not exposing potential pollutants to rainwater or other runoff. These BMPs and PPMs apply to many aspects of daily life within the City of San Luis Obispo.

**Major Sources of Water pollutants.** According to the RWQCB, the two most important sources of pollutants to the watershed are uncontrolled sediment and agricultural runoff. However, the RWQCB notes that many other sources are also important contributors, including pollutants from vehicles (oil, gasoline, and other fluids), trash, pharmaceuticals, and household chemicals. All storm drains within the City of San Luis Obispo lead to creeks and ultimately to the ocean.

**Surface Water Quality.** San Luis Obispo Creek has been designated by the Central Coast RWQCB as having present and potential beneficial uses for municipal supply; agricultural supply; groundwater recharge; recreation; wildlife habitat; warm and cold fresh water habitat; migration of aquatic organisms; spawning, reproduction, and/or early development of fish; and commercial and sport fishing. Although only a portion of San Luis Obispo Creek flows within City boundaries, it is important to look at the creek as a whole. According to the RWQCB, water quality in the San Luis Obispo Creek drainage system is generally considered to be good. However, the water quality fluctuates along with seasonal changes in flow rates. In summer months, when the flows decrease and dilution is reduced, water quality decreases. According to the RWQCB Total Maximum Daily Load (TMDL) Project for San Luis Obispo Creek, the creek has been reported to exceed nutrient and pathogen levels. Nitrate sources contributing to the nutrients identified in TMDL Project are, in decreasing order of contribution: City of San Luis Obispo Water Resource Recovery Facility (WRRF), croplands, background, reservoirs, and residential areas. The fecal coliform sources identified by the RWQCB TMDL Project are, in decreasing order of contribution: urban, human, birds and bats roosting in the tunnel, livestock, and background.

**Groundwater Quality.** Groundwater within the San Luis Obispo Valley Sub-basin flows toward the south-southwest, following the general gradient of surface topography. Groundwater occurs within the alluvial sediments and the underlying weathered and fractured bedrock. Depth to groundwater in the San Luis Obispo Valley Sub-basin is estimated to be 15 to 25 feet below ground surface. The majority of recharge to the basin is from precipitation falling in the hills to the west, north, and east.

Groundwater quality is determined principally by the chemical nature of the sediments and rocks within which the groundwater is contained. Groundwater is typically evaluated for its chemical constituents to assess current conditions and potential beneficial uses, or to identify possible contamination sources. Chemical constituent sources can be natural (e.g., contact with mineralized rock) or human-related (e.g., pesticide or fertilizer contamination).

Groundwater within the San Luis Obispo area is considered suitable for agricultural water supply, municipal and domestic supply, and industrial use (RWQCB 1994).

**Wastewater Treatment and Water Quality.** The Water Resource Recovery Facility (WRRF) processes wastewater in accordance with standards set by the State's RWQCB. The RWQCB issues a permit to the City under the NPDES, setting standards for the discharge of treated wastewater. The standards are to protect beneficial uses of the receiving water (San Luis Obispo Creek) including recreation, agricultural supply, and fish and wildlife habitat.

The WRRF removes solids, reduces the amount of nutrients, and eliminates bacteria in the treated wastewater, which is then discharged into San Luis Obispo Creek. Solids are separated and treated to create biosolids. Biosolids are
beneficially reused as compost, and / or soil amendment. The WRRF has been producing tertiary treated recycled water for non-potable uses in the city since 2006.

Like most cities in California, San Luis Obispo has separate sewer and storm drain systems. This means each system of pipes in the ground is designed to accommodate either sewer or stormwater flows. One set of pipes takes sanitary waste to the WRRF while a second set carries stormwater runoff from street drains to bioswales, detention basins, or creeks.

According to the City Sewer System Management Plan (October 2009), The City has made significant progress in reducing sanitary sewer overflows and service interruptions with comprehensive maintenance activities and capital improvement projects in the wastewater collection system intended to address significant historic infiltration/inflow (I&I) issues. Inflow is water that enters the collection system at points of direct connection (non-soil) such as around manhole covers or through illegal connection of roof drains, downspouts, or landscape drains. Infiltration is water that flows through the ground into the collection system usually through cracks in public sewer mains and/or private sewer laterals. I & I has the potential to overload the collection system during heavy rains and can result in sanitary sewer overflows. During periods of significant rain events, the WRRF can become hydraulically overwhelmed, increasing the chance of effluent violations and the release of partially treated wastewater to San Luis Obispo Creek.

c. Regulatory Setting

The City of San Luis Obispo addresses hydrology and water quality issues through implementation of adopted General Plan policies and programs. These policies are found in the Land Use, Conservation and Open Space, and Safety Elements. The goals and policies from the existing General Plan relate to protecting water quality and minimizing flood hazard risk within the city. The City of San Luis Obispo seeks to protect and enhance creek corridors to promote wildlife and water conservation. The City seeks to accomplish these goals by promoting responsible stormwater management techniques including using porous paving, preventing creek bank encroachment, and ensuring new developments do not decrease flood capacity of waterways.

Flood hazard policy in the City of San Luis Obispo is directed by the Safety Element of the General Plan and by the City Waterway Management Program (WMP) per City Council Resolution No. 9494 (2003 Series). The WMP incorporates three volumes: the WMP, the Drainage Design Manual (DDM), and the Stream Management and Maintenance Program. Under the General Plan, any property within the FIRM defined 100-year flood zone is considered as having a hazard potential requiring specified controls or protective measures. The City of San Luis Obispo’s Floodplain Management Regulations require that all building pads within a 100-year flood zone be raised at least one foot above the Base Flood Elevation (BFE) or that structures are flood-proofed or a combination of elevation and flood-proofing to at least one foot above the BFE. The regulations also state that, cumulatively, developments will not displace floodwater sufficient to raise the flood elevation more than one foot at any point, without causing damage to any off-site properties. The DDM provides for a more conservative limit on cumulative rise in flood elevation of 2.5 inches and limits floodwater velocity increases to 0.3 feet per second. The floodplain management policies in the DDM are more restrictive and generally require that fill placed on floodplains be managed so that there is no adverse impact in terms of flooding or bank stability. These are referred to as the “Managed Fill” and “No Adverse Impact” policies of the DDM. The DDM also requires applicants that create adverse hydrologic impacts to fully mitigate them.

The protection of water quality in San Luis Obispo Creek and its tributaries is under the jurisdiction of the Regional Water Quality Control Board. The City of San Luis Obispo also has the responsibility for regulating water quality under its National Pollutant Discharge Elimination System Municipal Separate Storm Sewer System (MS4) permits program. This board establishes requirements prescribing the quality of point sources of discharge and establishes water quality objectives. These objectives are established based on the designated beneficial uses for a particular surface water or groundwater. Beneficial uses of San Luis Obispo Creek include municipal, domestic, and agricultural water supply, groundwater recharge, Class I and II recreation, wildlife habitat, warm and cold water habitats, migration of aquatic species, spawning, freshwater habitat, and sport fishing. Within the city limits of San Luis Obispo, the jurisdiction for the water quality of the San Luis Obispo Creek Watershed overlaps with the City Public Works and Utilities agencies.
In accordance with the California Water Code, the RWQCB has developed a Basin Plan (2011) designed to preserve and enhance water quality and protect the beneficial uses of all regional waters. Water quality objectives for the Central Coastal Basin satisfy state and federal requirements established to protect waters for beneficial uses, and are consistent with existing statewide plans and policies.

**City of San Luis Obispo NPDES Phase II Program.** The City developed a stormwater management plan that was submitted to the RWQCB in July 2013 under the NPDES Phase II program. Development is required to be undertaken in strict accordance with conditions and requirements of that program, including new requirements for onsite stormwater treatment and retention.

**FEMA NFIP / Floodplain Management Regulation (City of San Luis Obispo Municipal Code, Chapter 17.84).** The San Luis Obispo County Flood Control and Irrigation District provides for control, disposition, and distribution of flood and storm waters of the district and of streams flowing into the district and for protection of the watersheds and watercourses in the district from such waters. The City of San Luis Obispo’s standards regarding areas located within or near the 100-year floodplain are outlined in Chapter 17.84 of the City Municipal Code, which is based on FEMA NFIP requirements. For structures within the 100-year floodplain, the code requires either the implementation of structural accommodations, namely limiting construction to at least one foot above floodplain elevation, or the addition of flood-proofing measures to the structure.

**City of San Luis Obispo Waterways Management Plan (2003).** The City has adopted the WMP for San Luis Obispo Creek to serve as a basis for future project planning, decision-making, and permitting. Procedures for hydrologic and hydraulic analysis, and guidelines and design criteria for the design of channels, storm drain systems, stormwater detention facilities, bank repair and stream restoration, and erosion control are described within this document.

**Special Floodplain Management Zone Regulations (Managed Fill Criteria).** Development of vacant lands in Special Floodplain Management Zone areas have been determined to have a potentially significant effect on downstream flooding and bank stability. As such, any development or subdivision proposal within the 100-year floodplain, on individual parcels or developments larger than 2.5 acres, the development proposal shall include a Concept Grading Plan and Master Drainage Plan. These plans shall be submitted to the City or County Public Works Director for approval and shall meet specific criteria, including:

- There shall be no significant net increase in upstream or downstream floodwater surface elevations for the 100-year flood at General Plan build-out as a result of changes in floodplain configuration and building construction.
- There shall be no significant net decrease in floodplain storage volume as a result of a new development or redevelopment projects. This can be achieved by a zero-net fill grading plan, balancing all fill placed on the 100-year floodplain with cut taken from other portions of the floodplain within the project area of the application, or with cut exported off-site.

**City of San Luis Obispo Engineering Standards.** The current Engineering Standards for the City include the following requirements relevant to water quality:

- All new development or redevelopment shall comply with the criteria and standards set forth in the Waterways Management Plan – Drainage Design Manual, applicable area specific plans, and the Post-Construction Stormwater Management Requirements for Development Projects in the Central Coast Region, adopted by the Central Coast Regional Water Quality Control Board, and included in the appendices. Where requirements conflict, the stricter shall apply.
- Stormwater Control Plan, and Operation and Maintenance Plan are required prior to final approvals.
- Projects with pollution generating activities and sources must be designed to implement operation or source control measures consistent with recommendations from the California Stormwater Quality Association Handbook for New Development and Redevelopment or equivalent, including:
  - Accidental spills or leaks
b) Interior floor drains

c) Parking / storage areas and maintenance

d) Indoor and structural pest control

e) Landscape / outdoor pesticide use

f) Pools, spas, ponds, decorative fountains and other water features

g) Restaurants, grocery stores, and other food service operations

h) Refuse areas

i) Industrial processes

j) Outdoor storage of equipment or materials

k) Vehicle and equipment cleaning, repair, and maintenance

l) Fuel dispensing areas

m) Loading docks

n) Fire sprinkler test water

o) Drain or wash water from boiler drain lines, condensate drain lines, rooftop equipment, drainage sumps, and other sources

p) Unauthorized non-stormwater discharges

q) Building and grounds maintenance

- Design should prevent water from contacting work areas, prevent pollutants from coming in contact with surfaces used by stormwater runoff, or where contact is unavoidable, and treat stormwater to remove pollutants.

- Operations and maintenance activities required to achieve Source Control are to be included in the Operation and Maintenance Plan submitted for approvals and recorded with the property as required by ordinance.

**City of San Luis Obispo Stormwater Quality Ordinance (City of San Luis Obispo Municipal Code, Chapter 12.08).** The purpose and intent of this Ordinance is to ensure the health, safety, and general welfare of citizens, and protect and enhance the quality of watercourses and water bodies in a manner pursuant to and consistent with the Clean Water Act by reducing pollutants in storm water discharges to the maximum extent practicable, by prohibiting non-storm water discharges to the storm drain system, and improving storm water management. (Ord. 1543 § 2 (part), 2010).

### 4.9.2 Impact Analysis

#### a. Methodology and Significance Thresholds

The assessment of Hydrology and Water Quality impacts involves reviewing the separate regulations that control the city’s water resources. An impact is considered significant if the development scenario under the proposed LUCE Update would result in one or more of the following conditions:

- Place housing within a 100-year floodplain, as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map;

- Place within a 100-year floodplain structures which would impede or redirect flood flows;

- Violate Regional Water Quality Control Board water quality standards or waste discharge requirements;

- Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level;
Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site;

Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems to control.

b. Project Impacts

**Impact HWQ-1**

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.

Flooding can cause widespread damage to affected areas, and endanger human safety. When urban areas encroach on floodplains, buildings and vehicles can be damaged or destroyed, while smaller objects can be buried in flood-deposited sediments. Floodwaters can break utility lines, interrupting services and potentially affecting health and safety. Floods may also create health and safety hazards and disrupt vital public services. The secondary effects of flooding are due to standing water, which can result in crop damage, septic tank failure, and water well contamination. Standing water can also damage roads, foundations, and electrical circuits. The extent of damage caused by any flood depends on the topography of the area flooded; depth, duration, and velocity of floodwaters; the extent of development in the floodplain; and the effectiveness of forecasting, warnings, and emergency operations. Encroachment onto floodplains, such as artificial fills and structures, reduces the capacity of the floodplain and increases the height of floodwater upstream of the obstructions.

Development under the policies proposed through the Land Use and Circulation Element Update could result in new development within the 100-year floodplain and could introduce structures in areas that could impede or redirect flood flows. Under the General Plan, any property within the Flood Insurance Rate Program (FIRM) defined 100-year flood zone is considered as having a hazard potential requiring specified controls or protective measures. Anticipated development under the proposed LUCE Update could subject new development to flooding impacts. The General Plan policies and adherence to the City of San Luis Obispo Waterways Management Plan, Special Floodplain Management Zone, and Engineering Standards would minimize floodplain subjectivity. Therefore, this impact is considered less than significant.

The proposed Airport overlay zone and compatibility criteria changes would not, in and of themselves, result in an environmental impact. However, future development in areas under the given zones could result in impacts and are discussed here in relation to the general development anticipated under the LUCE Update.

**Proposed LUCE Update Development Special Planning 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 flooding or impede or redirect flood flows, 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 flooding or impede or redirect flood flows.
Proposed Land Use Element Development Special Planning Areas

- **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 be located within the 100-year flood zone as identified by FEMA. Site redevelopment would allow for construction of a flood byway to alleviate smaller storm flooding;

- **Calle Joaquin Auto Sales Area:** This portion of Calle Joaquin is parallel to and west of Highway 101, south of the city, and is adjacent to the San Luis Ranch Specific Plan area. Future mixed use development in this area, as envisioned under the LUCE Update, would be located within the 100-year flood zone as identified by FEMA;

- **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 site is primarily undeveloped and is currently designated Interim Open Space. Future residential development in this area, as envisioned under the LUCE Update, is an area of flooding concern because it’s is within the 100-year flood zone as identified by FEMA. In particular, low lying areas near Los Osos Valley Road are subject to flooding during heavy storm events.

Proposed Circulation Element Street Network Changes

- **North-South Connection between Tank Farm Road and Buckley Road:** Tank Farm and Buckley Roads are parallel roads located at the southern boundary of the city, with the San Luis Obispo Airport and the southern portion of the Chevron Tank Farm located between the two roads. The sites are located adjacent to the Avila Ranch and San Luis Obispo Creek. The potential development of a connector between these two road systems would be potential located in an area of flooding concern within the 100-year flood zone as identified by FEMA;

- **Buckley Road to Los Osos Valley Road Connections:** This area is located along the southwest portion of the city, neighboring areas of relative open space, including agricultural development and some commercial and residential areas. Portions of this area between Buckley Road and Highway 101 to the west remain relatively undeveloped. Areas to the northwest, between Buckley Road and Los Osos Valley Road, contain open areas associated with both San Luis Obispo and Prefumo Creek. Development in this area could potentially be located within the 100-year flood zone as identified by FEMA.

The potential impacts from flooding related to implementation of the above development area projects and street network changes would be considered significant; however, incorporation of the LUCE Update policies and existing City policies discussed below would reduce impacts to less than significant levels.

Proposed Land Use Element Specific Plan Areas

- **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 planned development parameters for the San Luis Ranch Specific Plan Area have been outlined in the proposed LUCE Update in Section 2.0, Project Description. The San Luis Ranch site is located within the floodplain of both San Luis Obispo and Prefumo Creeks and is characterized primarily by its use as an agricultural property.

About 3/4 of the San Luis Ranch property is within the 100-year flood zone as identified by FEMA. The City of San Luis Obispo also documents that the San Luis Ranch property is an area of flooding concern, as it lies within the floodplain of two creeks. However, implementation of the proposed LUCE Update policies, and the existing City policies identified below, would reduce future impacts to less than significant levels. The development will also be subject to the new Post Construction Requirements adopted by the Central Coast Regional Water Quality Control Board, and incorporated in City development requirements.

- **Madonna on Los Osos Valley Road Specific Plan Area**
This site includes just over 111 acres and is located directly west of the intersection of Los Osos Valley Road and Calle Joaquin. The planned development parameters for the Madonna on Los Osos Valley Road Specific Plan Area have been outlined in the proposed LUCE Update in Section 2.0, Project Description. The Madonna on Los Osos Valley Road site is characterized primarily by its use as an agricultural property with low lying areas closer to Los Osos Valley road prone to flooding and flat grassland backed by rolling hills.

A portion of the low lying areas within the Madonna on Los Osos Valley Road Specific Plan Area are within the 100-year flood zone as identified by FEMA. However, implementation of the proposed LUCE Update policies, and the existing City policies identified below, would reduce impacts from future development to less than significant levels.

- **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 planned development parameters for the Avila Ranch Specific Plan Area have been outlined in the proposed LUCE Update in Section 2.0, Project Description. Although historically used for agriculture, there are some existing buildings along the north and west consisting of service and manufacturing uses. A portion of San Luis Creek runs diagonally through the middle of the property, influencing site flooding and drainage patterns in low lying areas.

  The property on either side of San Luis Creek within the Avila Ranch Specific Plan Area is identified by FEMA as being within the 100-year flood zone. The City of San Luis Obispo also documents that the Avila Ranch Specific Plan Area is an area of flooding concern, as it lies within the floodplain of San Luis Obispo Creek. However, implementation of the proposed LUCE Update policies, and the existing City policies identified below, would reduce impacts related to potential future development to less than significant levels.

- **South Broad Street Special Planning Area**
  The South Broad Street Area encompasses approximately 86 acres and is bounded by the Broad Street on the west, the Union Pacific Railroad on the east, High Street to the north, and Orcutt Road to the south. Nearby services and amenities to the north include: the Regional Transit Center, Fire Station #1, Hawthorne Elementary School, and Meadow Park. To the south, there are retail shopping centers, the Maxine Lewis Memorial Shelter, and the Damon-Garcia Sports Fields facility. This area is characterized as part of the urban core of the city and is a primarily developed environment.

  Although located in proximity to Acacia Creek, the South Broad Street Special Planning Area is elevated in topography and is outside of the 100-year flood zone as identified by FEMA. As such, impacts related to flooding are considered less than significant.

**Applicable LUCE Update Policies**

The General Plan Land Use Element Update draft includes edits to existing policies and programs to address flooding issues (policy language edited as part of the LUCE Update is shown using “strikeout and underline” format), while some existing language was retained after critical review:

**6.2 Hillside Policies [RELEVANT PORTION]**

6.2.1 The City shall maintain comprehensive standards and policies for hillside development for the following reasons:

   C. To protect the health, safety and welfare of community residents by directing development away from areas with hazards such as landslides, wildland fires, flooding and erosion.

6.2.2 Development Limits. The City shall establish and maintain clear development limit lines for hillside planning areas which have been carefully chosen development limit lines, and special design standards for the hillside areas which can be developed. The location of the development limit and the standards should cause development to avoid encroachment into sensitive habitats or unique resources as defined in the Conservation
and Open Space Element, and public health and safety problems related to utility service, access, wildland fire hazard, erosion, flooding, and landslides and other geologic hazards. Also, the development limit line and the standards should help protect the city’s scenic setting. (Locations of hillside planning areas are shown in Figure 6. More precise locations of the development limit line and the urban reserve line are shown on large scale aerial photographs on file at the Community Development Department; these are part of the Land Use Element.)

6.4.1 Creek and Wetlands Management Objectives. The City shall manage its lake, creeks, wetlands, floodplains, and associated wetlands to achieve the multiple objectives of:

A. Maintaining and restoring natural conditions and fish and wildlife habitat;
B. Preventing loss of life and minimizing property damage from flooding;
C. Providing recreational opportunities which are compatible with fish and wildlife habitat, flood protection, and use of adjacent private properties.
D. Recognizing and distinguishing between those sections of creeks and Laguna Lake which are in previously urbanized areas, such as the Downtown core, and sections which are in largely natural areas. Those sections already heavily impacted by urban development and activity may be appropriate for multiple use whereas creeks and lakeshore in a more natural state shall be managed for maximized ecological value.

6.4.5 Porous Paving Runoff Reduction and Groundwater Recharge. The City encourages implementation of Post Construction requirements in new and redevelopment projects to reduce surface water runoff and aid in groundwater recharge. Porous paving; ample landscaped areas which receive surface drainage and which are maintained to facilitate percolation; drainage detention basins with soils that facilitate percolation.

6.4.6 Development Requirements. The City shall require project designs that minimize drainage concentrations and impervious coverage and avoid floodplain areas and, where feasible, any channelization shall be designed to provide the appearance of a natural water course.

6.5.1 Previously Developed Areas. To limit the potential for increased flood damage in previously developed urbanized areas, the City will ensure new development complies with the City’s flood plain ordinance, setbacks, specific plans, and design standards to minimize flood damage and flood plain encroachment.

A. Ensure that infill, remodel, and replacement projects:

1. Do not displace more flood water than previous structures on a site;
2. Do not contribute floating debris to flood waters;
3. Have finish floors at least one foot above the flood level or, if this is not practical, be flood-proofed, to minimize risk to life and damage to utilities, furnishings, merchandise, and equipment.

B. Require new infill buildings to have greater setbacks than their older neighbors, when necessary to achieve the purposes of this section.

C. Remove man-made obstruction from channels.

D. Ensure that any new development in the watershed detains rather than accelerates runoff from development sites.

6.5.2 National Flood Program. The City shall administer the National Flood Insurance Program standards.

6.5.3 Creekside Care and Notification. In maintaining creek channels to accommodate flood waters, the City shall notify owners of creeks and adjacent properties in advance of work, and use care in any needed removal of vegetation.

8.3.2.4 SP-2, San Luis Ranch (Dalidio) Specific Plan Area [RELEVANT PORTION]

k. Potential flooding issues along Prefumo Creek need to be studied and addressed without impacting off-site uses.
8.3.3.8 Sunset Drive-in Theater / Prado Road Area

This 38-acre area should be further developed only if flooding can be mitigated without significant harm to San Luis Obispo Creek. Until flood hazards are mitigated, continued agricultural use and low-intensity recreational use are appropriate. Any use drawing substantial regional traffic also depends on providing a full interchange needed infrastructure at Prado Road and extending Prado Road to connect with Madonna Road.

Once flooding, access, and agricultural preservation issues are resolved, agricultural preservation requirements are met, the area would be suitable for government agencies’ regional offices (see also Policy 5.1.6), development as a mixed use (horizontal or vertical) development with a mix of Commercial uses. Permanent open space shall be required in order to protect the adjacent San Luis Obispo Creek. As part of future development, a full assessment of the Drive-in Theater site’s potential as a historic resource will need to be evaluated and addressed. Bicycle connectivity as referenced in the Bicycle Transportation Plan is an important component of future development of the area.

The site property within the area may need to be designed to accommodate the Homeless Services center and/or transportation agency use.

8.3.3.11 LOVR Creekside Area

This area is heavily constrained by flood potential along the western boundary as well as limited circulation access to the site given its proximity to the proposed LOVR / Highway 101 interchange and its limited frontage on LOVR. Flooding and access issues must be resolved prior to developing Medium High Density Residential (in areas adjacent to existing residential uses). Agricultural Designations must be maintained along the west side of site. As part of future development, compatibility with adjacent residential areas to the east will be required.

Permanent protection of the adjacent San Luis Obispo Creek will need to be addressed as part of proposed development. The south side of the site will also need to accommodate relocation of LOVR right-of-way and changes related to the planned Highway 101 interchange.

Applicable Existing City Policies

The existing General Plan Conservation and Open Space Element (2006) lists goals and policies aimed to protect from flooding which include:

7.7.9 Creek Setbacks. As further described in the Zoning Regulations, the City will maintain creek setbacks to include: an appropriate separation from the physical top of bank, the appropriate floodway as identified in the Flood Management Policy, native riparian plants or wildlife habitat and space for paths called for by any City-adopted plan. In addition, creek setbacks should be consistent with the following:

A. The following items should be no closer to the wetland or creek than the setback line: buildings, streets, driveways, parking lots, above-ground utilities, and outdoor commercial storage or work areas.

B. Development approvals should respect the separation from creek banks and protection of floodways and natural features identified in part A above, whether or not the setback line has been established.

C. Features which normally would be outside the creek setback may be permitted to encroach where there is no practical alternative, to allow reasonable development of a parcel, consistent with the Conservation and Open Space Element.

D. Existing bridges may be replaced or widened, consistent with policies in this Element. Removal of any existing bridge or restoration of a channel to more natural conditions will provide for wildlife corridors, traffic circulation, access, utilities, and reasonable use of adjacent properties.

8.3.3 Open space for safety. [RELEVANT PORTION] Secure open space where development would be unsafe.

Generally, the following locations are considered to be unsafe:
4.0 Environmental Impact Analysis

D. Areas subject to flooding, where the frequency, depth, or velocity of floodwaters poses an unacceptable risk to life, health, or property.

Protection of public resources such as water quality (watershed runoff and groundwater recharge). Avoidance of threats to public health and safety, such as ground instability (in the case of vegetation management for wildland fire, separation between hazardous vegetation and structures generally should be provided on the land containing the structure, by the owner of the land containing the structure. Where vegetation management on City-owned land is needed or desirable, management practices will minimize harm to wildlife habitat and scenic resources).

10.2.2 Ahwahnee Water Principles. In planning for its water operations, programs and services, the City will be guided by the Ahwahnee Water Principles and will encourage individuals, organizations, and other agencies to follow these policies:

A. Community design should be compact, mixed use, walkable and transit-oriented so that automobile-generated urban runoff pollutants are minimized and the open lands that absorb water are preserved to the maximum extent possible.

B. Natural resources such as wetlands, flood plains, recharge zones, riparian areas, open space, and native habitats should be identified, preserved and restored as valued assets for flood protection, water quality improvement, groundwater recharge, habitat, and overall long-term water resource sustainability.

C. Water holding areas such as creekbeds, recessed athletic fields, ponds, cisterns, and other features that serve to recharge groundwater, reduce runoff, improve water quality and decrease flooding should be incorporated into the urban landscape.

D. All aspects of landscaping from the selection of plants to soil preparation and the installation of irrigation systems should be designed to reduce water demand, retain runoff, decrease flooding, and recharge groundwater.

E. Permeable surfaces should be used for hardscape. Impervious surfaces such as driveways, streets, and parking lots should be minimized so that land is available to absorb storm water, reduce polluted urban runoff, recharge groundwater and reduce flooding.

F. Dual plumbing that allows grey water from showers, sinks and washers to be reused for landscape irrigation should be included in the infrastructure of new development, consistent with State guidelines.

G. Community design should maximize the use of recycled water for appropriate applications including outdoor irrigation, toilet flushing, and commercial and industrial processes. Purple pipe should be installed in all new construction and remodeled buildings in anticipation of the future availability of recycled water.

H. Urban water conservation technologies such as low-flow toilets, efficient clothes washers, and more efficient water-using industrial equipment should be incorporated in all new construction and retrofitted in remodeled buildings.

I. Ground water treatment and brackish water desalination should be pursued when necessary to maximize locally available, drought-proof water supplies.

The existing General Plan Safety Element (2006) lists goals and policies aimed to protect from flooding which include:

2.1 Policy S: Flood Hazard Avoidance and Reduction

A. The City will develop and carry out environmentally sensitive programs to reduce or eliminate the potential for flooding in previously developed, flood-prone areas of the city.

B. The City should allow flood waters to move through natural channels. Flow should be accommodated by removing debris and man-made obstructions. The City recognizes that many natural channels cannot
contain runoff from a storm greater than a 25-year event. Areas flooded by storms as large as a 100-year event will be mapped.

C. No new building or fill should encroach beyond, or extend over, the top-of-bank of any creek.

D. Within predominantly developed areas (such as downtown) infill, remodel, and replacement projects should not displace more flood water than previous structures on the site or in the vicinity. Commercial buildings may be flood-proofed where providing floor levels above the 100-year storm flow is not appropriate due to adjacent improvements. New infill buildings may be required to have greater setbacks than their older neighbors.

E. Within new development areas, such as the potential expansion areas shown in Figure 2 of the Land Use Element, substantial displacement of flood waters should be avoided by:
   1. Keeping a substantial amount of flood-prone land in the vicinity as open space;
   2. Enlarging man-made bottlenecks, such as culverts, which contribute to flood waters backing up from them;
   3. Accommodating in such places uses which have relatively low ratios of building coverage to site area, for which shallow flooding of parking and landscape areas would cause minimum damage.
   4. Requiring new buildings to be constructed above the 100-year flood level.

F. Creek alternations shall be considered only if there is no practical alternative, consistent with the Conservation and Open Space Element.

G. Development close to creeks shall be designed to avoid damage due to future creek bank erosion. Property owners shall be responsible for protecting their developments from damage caused by future bank loss due to flood flows.

10.12 Policy S: Critical Facilities Locations [RELEVANT PORTION]

B. The following facilities operated by entities other than the City, which are necessary for community function and emergency response, should not be located in 100-year floodplains, in areas of high or extreme wildland fire hazard, on sites subject to liquefaction or landslide [as distinguished from areas with potential for these hazards], atop earthquake faults or within State-designated special studies zones, or in airport inner safety zones or outer safety zones:
   - hospitals
   - Caltrans and utilities corporation yards
   - principal electrical substations
   - principal natural gas transmission mains and pumping stations
   - principal public-utility telecommunications and emergency broadcast facilities

In addition to the General Plan policies listed above, adherence to the City of San Luis Obispo’s Floodplain Management Zone Regulations, the Waterway Management Program (WMP), the Drainage Design Manual (DDM), and the Stream Management and Maintenance Program will ensure that impacts from flooding remain less than significant. No additional policy direction is required. Individual development will be required to undergo separate environmental review, which may result in specific impacts that require project specific mitigation consistent with these policies.

Mitigation Measures

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, the proposed and existing City policies and programs discussed above directly address future development with the potential to impact from flooding. 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. As such, with the incorporation of the proposed project and adherence to existing City policies and programs discussed above, additional mitigation is not required.

Significance After Mitigation

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.

Impact HWQ-2

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.

Development as a result of the policies proposed under the LUCE Update could cause an increase in the amount of impervious surfaces within the city which could lead to the lack of percolation of water to the groundwater basin and could alter drainage patterns resulting in erosion and/or sedimentation. Potential development may also increase the volume of surface runoff due to lack of percolation.

Most development that could be facilitated by the LUCE Update would occur in vacant and/or underutilized parcels throughout the city. However, based on the current regulations of the RWQCB reflected in the City’s Stormwater Management Program (SWMP), effective July 2013, future development and redevelopment projects within the City of San Luis Obispo are required to comply with the Central Coast Regional Water Quality Control Board Post Construction Requirements.

Future development facilitated by the LUCE Update could result in additional runoff from the impervious area constructed. This additional impervious area has the potential result in an increase in the amount of runoff within the watershed, as well as a marginal decrease in percolation to the groundwater basin. However, upon compliance with the terms of the City’s SWMP referenced above, impacts would be less than significant.

The proposed Airport overlay zone and compatibility criteria changes would not, in and of themselves, result in an environmental impact. However, future development in areas under the given zones could result in impacts and are discussed here in relation to the general development anticipated under the LUCE Update.

Proposed LUCE Update Development Special Planning 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 development which would increase the amount of impervious surface which would decrease in percolation to the groundwater basin, that could expose individuals to health risks due to soil/groundwater contamination or emission of hazardous materials into the air, 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.

Future implementation of the following proposed development area projects and street network changes would have the potential to result in significant impacts related to new development by the increase in the amount of impervious surface which would decrease percolation to the groundwater basin.
Proposed Land Use Element Development Special Planning Areas

- **Foothill @ Santa Rosa Area:** This is an urbanized area of the city core and is located at the northern end of the city, adjacent to a variety of neighboring land uses including commercial/retail, offices, gas stations and multi-family residential development. Future mixed use development in this area, as envisioned under the LUCE Update, could increase the amount of impervious surface in the area, which would decrease percolation to the groundwater basin and could alter drainage patterns and increase runoff volumes potentially resulting in erosion and/or sedimentation;

- **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, could increase the amount of impervious surface in the area, which would decrease percolation to the groundwater basin and could alter drainage patterns and increase runoff volumes potentially resulting in erosion and/or sedimentation;

- **General Hospital Site:** This area is located along the eastern boundary of the city, near the intersection of Johnson Avenue and Bishop Street and represents an urban interface with the hillsides and designated Open Space to the east. Future residential development in this area, as envisioned under the LUCE Update, could increase the amount of impervious surface in the area, which would decrease percolation to the groundwater basin and could alter drainage patterns and increase runoff volumes potentially resulting in erosion and/or sedimentation;

- **Sunset Drive-In Site:** This site is located near the intersection of Prado Road and Elks Lane, at the southern boundary of the city, just east of Highway 101. The consideration of future mixed use development in this area, as envisioned under the LUCE Update, could increase the amount of impervious surface in the area, which would decrease percolation to the groundwater basin and could alter drainage patterns and increase runoff volumes potentially resulting in erosion and/or sedimentation;

- **Pacific Beach Site:** This site is located adjacent to the Prefumo Creek Commons shopping center, on Los Osos Valley Road, just south of the Madonna Road intersection. The site currently supports the Pacific Beach continuation school. Future Commercial Retail development of this site could increase the amount of impervious surface in the area, which would decrease percolation to the groundwater basin and could alter drainage patterns and increase runoff volumes potentially resulting in erosion and/or sedimentation;

- **Calle Joaquin Auto Sales Area:** This portion of Calle Joaquin is parallel to and west of Highway 101, south of the city, and is adjacent to the San Luis Ranch Specific Plan area. Future mixed use development in this area, as envisioned under the LUCE Update, could increase the amount of impervious surface in the area, which would decrease percolation to the groundwater basin and could alter drainage patterns and increase runoff volumes potentially resulting in erosion and/or sedimentation;

- **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 site is primarily undeveloped and serves as a gateway to designated Open Space to the west. Future residential development in this area, as envisioned under the LUCE Update, could increase the amount of impervious surface in the area, which would decrease percolation to the groundwater basin and could alter drainage patterns and increase runoff volumes potentially resulting in erosion and/or sedimentation; and

- **Broad Street @ Tank Farm Road Site:** This site is located at the southern limit of the city, and currently supports the Marigold Shopping Center and the mixed use commercial/office development adjacent to the Shell Station, with some residential development bordering the area to the east and west along Tank Farm Road. Future mixed use development envisioned under the LUCE Update could increase the amount of impervious surface in
the area, which would decrease percolation to the groundwater basin and could alter drainage patterns and increase runoff volumes potentially resulting in erosion and/or sedimentation.

Proposed Circulation Element Street Network Changes

- **Transit Center Location on Santa Rosa Street and Higuera Street**: This street intersection is within the city downtown core and represents a gateway into the commercial/retail center of the downtown core. The development of a future Transit Center, as envisioned under the LUCE Update, could increase the amount of impervious surface in the area, which would decrease percolation to the groundwater basin and could alter drainage patterns and increase runoff volumes;

- **Connections to Dalidio Drive from Froom Ranch Way and/or Calle Joaquin**: This area is located west of Highway 101, south of the city, and is part of the San Luis Ranch Specific Plan area. This area is primarily in active agricultural production (row crops), with portions of the site consisting of some agricultural development and areas of undisturbed open space and riparian vegetation associated with San Luis Obispo Creek. The development of a connector could increase the amount of impervious surface which would decrease in percolation to the groundwater basin;

- **North-South Connection between Tank Farm Road, and Buckley Road**: Tank Farm and Buckley Roads are parallel streets located at the southern boundary of the city, with the San Luis Obispo Airport and the southern portion of the Chevron Tank Farm located between the two roads. The sites are located adjacent to the Avila Ranch and San Luis Obispo Creek. The potential development of a connector between these two road systems could increase the amount of impervious surface in the area, which would decrease percolation to the groundwater basin and could alter drainage patterns and increase runoff volumes potentially resulting in erosion and/or sedimentation;

- **Buckley Road to Los Osos Valley Road Connections**: This area is located along the southwest portion of the city, neighboring areas of relative open space, including agricultural development and some commercial and residential areas. Portions of this area between Buckley Road and Highway 101 to the west remain relatively undeveloped. Areas to the northwest, between Buckley Road and Los Osos Valley Road, contain open areas associated with both San Luis Obispo and Prefumo Creek. Development in this area could increase the amount of impervious surface in the area, which would decrease percolation to the groundwater basin and could alter drainage patterns and increase runoff volumes potentially resulting in erosion and/or sedimentation; and

- **Prado Road Interchange vs. Overpass**: The location of a potential Highway 101 interchange or overpass in this area, located at the southern boundary of the city potentilly connecting Prado Road (east of the Highway) to the area near San Luis Ranch, Dalidio Drive and the Promenade Shopping Center (west of the Highway), could increase the amount of impervious surface in the area, which would decrease percolation to the groundwater basin and could alter drainage patterns and increase runoff volumes potentially resulting in erosion and/or sedimentation.

The potential impacts related to implementation of the above development area projects and street network changes would be considered significant, however, incorporation of the LUCE Update policies and existing City policies discussed below would reduce impacts to less than significant levels.

Proposed Land Use Element Specific Plan Areas

- **San Luis Ranch Specific Plan Area**

  This area is located in the southwest quarter of the city at the corner of Madonna Road and Dalidio Drive and is characterized primarily by its use as an agricultural property which is primarily undeveloped and consists of unpaved native soils within the floodplain of San Luis Obispo and Prefumo Creeks.

  The San Luis Ranch Specific Plan Area development potential, as outlined in the proposed LUCE Update, would result in a primarily developed environment and a general increase in the amount of impervious surfaces onsite. Implementation of the proposed LUCE Update policies and the existing City policies identified below would
reduce impacts related to groundwater percolation and recharge and the altering of existing drainage patterns to less than significant levels.

**Madonna on Los Osos Valley Road Specific Plan Area**
This site includes just over 111 acres and is located directly west of the intersection of Los Osos Valley Road and Calle Joaquin. The planned development parameters for the Madonna on Los Osos Valley Road Specific Plan Area have been outlined in the proposed LUCE Update in Section 2.0, Project Description. The Madonna on Los Osos Valley Road site is characterized primarily by its use as an agricultural property which is mainly undeveloped.

The Madonna on Los Osos Valley Road Specific Plan Area development potential, as outlined in the proposed LUCE Update, would result in increase the amount of impervious surface. Implementation of the proposed LUCE Update policies and the existing City policies identified below would reduce impacts related to groundwater percolation and recharge and the altering of existing drainage patterns to less than significant levels.

**Avila Ranch Specific Plan Area**
This site is located on the north side of Buckley Road at the far southern edge of the city and includes some existing buildings along the north and west consisting of service and manufacturing uses. The majority of the site is undeveloped land used for agriculture consisting primarily of land within the floodplain of a portion of San Luis Obispo Creek. Onsite stormwater is drained by the creek.

The Avila Ranch Specific Plan Area development potential, as outlined in the proposed LUCE Update, could result in 500 to 700 homes and 15,000-25,000 square feet of commercial space with 75 acres of open space. This would result in increase the amount of impervious surface thought out the Avila Ranch Specific Plan Area. Implementation of the proposed LUCE Update policies and the existing City policies identified below would reduce impacts related to groundwater percolation and recharge and the altering of existing drainage patterns to less than significant levels.

**South Broad Street Special Planning Area**
The South Broad Street Area encompasses approximately 86 acres and is bounded by the Broad Street on the west, the Union Pacific Railroad on the east, High Street to the north, and Orcutt Road to the south.

The South Broad Street Special Planning Area is located within the urban center of the city in an existing developed area. However, additional development under the LUCE Update could result in infill development which may increase the amount of impervious surfaces. Implementation of the proposed LUCE Update policies, and the existing City policies identified below, would reduce impacts related to groundwater percolation and recharge and the altering of existing drainage patterns to less than significant levels.

**Applicable LUCE Update Policies**
The General Plan Land Use Element Update includes goals, policies and programs to address impacts related to groundwater percolation and recharge and the altering of existing drainage patterns to less than significant levels. The following policies address potential impacts related to the addition of new development located in this designation.

- 6.4.5 Runoff Reduction and Groundwater Recharge;
- 6.4.6 Development Requirements; and
- 6.5.1 Previously Developed Areas.

Please refer to the policy discussion under Impact HWQ-1 for the full text of the policies and programs listed above.

**Applicable Existing City Policies**
The existing General Plan Safety Element (2006) lists the following policies that address potential impacts related to groundwater percolation and recharge and the altering of existing drainage patterns and are discussed in detail under Impact HWQ-1:
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- 2.1 Policy S: Flood Hazard Avoidance and Reduction
- 10.12 Policy S: Critical Facilities Locations [RELEVANT PORTION]

The existing General Plan Conservation and Open Space Element (2006) lists goals, policies and programs related to groundwater percolation and recharge and the altering of existing drainage patterns. The following policies and goals address potential impacts related to groundwater percolation and recharge and the altering of existing drainage patterns and are discussed in detail under Impact HWQ-1:

- 8.3.3 Open space for safety; and
- 10.2.2 Ahwahnee Water Principles.

The General Plan Conservation and Open Space Element lists policies related to groundwater percolation and recharge and the altering of existing drainage patterns which include:

10.1.3 GOAL: Water Quality. Protect and maintain water quality in aquifers, Laguna Lake, streams, and wetlands that supports all beneficial uses, agriculture, and wildlife habitat.

10.2.1 Water Quality. The City will employ the best available practices for pollution avoidance and control, and will encourage others to do so. “Best available practices” means behavior and technologies that result in the highest water quality, considering available equipment, life-cycle costs, social and environmental side effects, and the regulations of other agencies.

Adherence to the existing City’s General Plan, the proposed LUCE Update, and compliance with the City’s Stormwater Management Plan (SWMP) will ensure that the creation of additional impervious areas will not increase the amount of runoff within the watershed, and will not affect percolation to the groundwater basin or adversely alter drainage patterns. As such, impacts would be less than significant. No additional policy direction is required. Individual development will be required to undergo separate environmental review, which may result in specific impacts that require project specific mitigation consistent with these policies.

Mitigation Measures

Development facilitated by the LUCE Update has the potential to increase the amount of impervious surface 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. However, the proposed and existing City policies and programs discussed above directly address future development with the potential to impact from impervious surface runoff. 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. As such, with the incorporation of the proposed project and adherence to existing City policies and programs discussed above, additional mitigation is not required.

Significance After Mitigation

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.

Impact HWQ-3

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.
Potential development in accordance with the policies proposed under the LUCE Update could increase the amount of point and non-point sources of contamination which could affect water quality and groundwater in the City of San Luis Obispo. An increase in point source and non-point source pollution could result from increases in development intensity and construction activities which may directly impact water quality specific to site drainage patterns.

Discharge of pollutants from any point source is prohibited unless the discharge is in compliance with a National Pollutant Discharge Elimination System (NPDES) Permit issued by the Regional Water Quality Control Board. Generally, pollutants of greatest concern in regulation of point sources include nutrients (ammonia and nitrate), heavy metals, toxic chemicals, chlorine, and salts.

Construction activities could also result in the pollution of natural watercourses or underground aquifers. The types of pollutant discharges that could occur as a result of construction include accidental spillage of fuel and lubricants, discharge of excess concrete, and an increase in sediment runoff.

Regulations under the federal Clean Water Act and the State require construction activity that disturbs greater than one acre, or that disturbs less than one acre but is part of a larger common plan of development, to comply with the NPDES State General Construction Permit. The Permit requires the preparation of a Storm Water Pollution Prevention Plan (SWPPP) that contains specific actions, termed Best Management Practices (BMPs), to control the discharge of pollutants, including sediment, into local surface water drainages. A Notice of Intent (NOI) to perform work under the Permit must be filed with the State. In the State of California, Regional Water Quality Control Boards administer the NPDES permit process for construction sites, with implementation coordinated with the local agencies under their Phase I and Phase II NPDES Municipal Permits (SWMP).

Increases in development intensity that could occur under the LUCE Update may incrementally increase pollutants in surface runoff. On the other hand, new development would be required to comply with current federal, state, and local requirements, which are more stringent than what was required at the time most existing development within the city was built. As such, redevelopment of these areas with new projects that incorporate current BMP requirements has the potential to improve water quality in area drainages. Overall, impacts are anticipated to be less than significant.

The proposed Airport overlay zone and compatibility criteria changes would not, in and of themselves, result in an environmental impact. However, future development in areas under the given zones could result in impacts and are discussed here in relation to the general development anticipated under the LUCE Update.

**Proposed LUCE Update Development Special Planning 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 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 from new development, 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.

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 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 from new development.

**Proposed Land Use Element Development Special Planning Areas**

- **Foothill @ Santa Rosa Area:** This is an urbanized area of the city core and is located at the northern end of the city, adjacent to a variety of neighboring land uses including commercial/retail, offices, gas stations and multi-family residential development. Future mixed use development in this area, as envisioned under the LUCE
Update, could introduce 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;

- **Caltrans Site:** This area is located near the Marsh Street off-ramp on Highway 101, at the intersection of Higuera Street and Marsh Street and consists of an existing Caltrans service and equipment yard, adjacent to San Luis Obispo Creek. Future mixed use development in this area, as envisioned under the LUCE Update, could introduce point and non-point sources of contamination could affect water quality in San Luis Obispo Creek, as well as other surface waters and groundwater in the city;

- **General Hospital Site:** This area is located along the eastern boundary of the city, near the intersection of Johnson Avenue and Bishop Street and represents an urban interface with the hillsides and designated Open Space to the east. Future residential development in this area, as envisioned under the LUCE Update, could introduce point and non-point sources of contamination could affect water quality in San Luis Obispo Creek, as well as other surface waters and groundwater in the city;

- **Sunset Drive-In Site:** This site is located near the intersection of Prado Road and Elks Lane, at the southern boundary of the city, just east of Highway 101 and adjacent to San Luis Obispo Creek. The consideration of future mixed use development in this area, as envisioned under the LUCE Update, could introduce point and non-point sources of contamination could affect water quality in San Luis Obispo Creek, as well as other surface waters and groundwater in the city;

- **Pacific Beach Site:** This site is located adjacent to the Prefumo Creek Commons shopping center, on Los Osos Valley Road, just south of the Madonna Road intersection. The site currently supports the Pacific Beach continuation school. Future Commercial Retail development of this site could introduce point and non-point sources of contamination could affect water quality in surface waters and groundwater in the city;

- **Calle Joaquin Auto Sales Area:** This portion of Calle Joaquin is parallel to and west of Highway 101, south of the city, and is adjacent to the San Luis Ranch Specific Plan area, near the confluence of San Luis Obispo Creek and Prefumo Creek. Future mixed use development in this area, as envisioned under the LUCE Update, could introduce 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;

- **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 site is primarily undeveloped and serves as a gateway to designated Open Space to the west and is located adjacent to Prefumo Creek. Future residential development in this area, as envisioned under the LUCE Update, could introduce point and non-point sources of contamination could affect water quality in Prefumo Creek, downstream to San Luis Obispo Creek, as well as other surface waters and groundwater in the city; and

- **Broad Street @ Tank Farm Road Site:** This site is located at the southern limit of the city, and currently supports the Marigold Shopping Center and the mixed use commercial/office development adjacent to the Shell Station, with some residential development bordering the area to the east and west along Tank Farm Road. Future mixed use development envisioned under the LUCE Update could introduce 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.

**Proposed Circulation Element Street Network Changes**

- **Transit Center Location on Santa Rosa Street and Higuera Street:** This street intersection is within the city downtown core and represents a gateway into the commercial/retail center of the downtown core. The development of a future Transit Center, as envisioned under the LUCE Update, could introduce 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;
Connections to Dalidio Drive from Froom Ranch Way and/or Calle Joaquin: This area is located west of Highway 101, south of the city, and is part of the San Luis Ranch Specific Plan area. This area is primarily in active agricultural production (row crops), with portions of the site consisting of some agricultural development and areas of undisturbed open space and riparian vegetation associated with San Luis Obispo Creek. The development of a connector could introduce 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;

North-South Connection between Tank Farm Road, and Buckley Road: Tank Farm and Buckley Roads are parallel streets located at the southern boundary of the city, with the San Luis Obispo Airport and the southern portion of the Chevron Tank Farm located between the two roads. The sites are located adjacent to the Avila Ranch and San Luis Obispo Creek. The potential development of a connector between these two road systems could introduce point and non-point sources of contamination could affect water quality in San Luis Obispo Creek, Tank Farm Creek as well as other surface waters and groundwater in the city;

Buckley Road to Los Osos Valley Road Connections: This area is located along the southwest portion of the city, neighboring areas of relative open space, including agricultural development and some commercial and residential areas. Portions of this area between Buckley Road and Highway 101 to the west remain relatively undeveloped. Areas to the northwest, between Buckley Road and Los Osos Valley Road, contain open areas associated with both San Luis Obispo and Prefumo Creek. Development in this area could introduce point and non-point sources of contamination could affect water quality in San Luis Obispo Creek, Tank Farm Creek as well as other surface waters and groundwater in the city;

Prado Road Interchange vs. Overpass: The location of a potential Highway 101 interchange or overpass in this area, located at the southern boundary of the city potentially connecting Prado Road (east of the Highway) to the area near San Luis Ranch, Dalidio Drive and the Promenade Shopping Center (west of the Highway), could introduce point and non-point sources of contamination that could affect water quality in San Luis Obispo Creek, as well as other surface waters and groundwater in the city.

The potential impacts related to implementation of the above development area projects and street network changes would be considered significant, however, incorporation of the LUCE Update policies and existing City policies discussed below would reduce impacts to less than significant levels.

Proposed Land Use Element Specific Plan Areas

San Luis Ranch Specific Plan Area

The San Luis Ranch site is characterized primarily by its use as an agricultural property which is primarily undeveloped, consisting of low lying areas within the floodplain of and draining directly to both San Luis Obispo and Prefumo Creeks.

The San Luis Ranch Specific Plan Area development potential, as outlined in the proposed LUCE Update, could result in an increase of point and non-point sources of contamination that could drain to and ultimately affect water quality in San Luis Obispo. However, implementation of the proposed LUCE Update policies; compliance with current federal and state requirements; and the existing City policies identified below, would reduce impacts related to surface and groundwater pollution to less than significant levels.

Madonna on Los Osos Valley Road Specific Plan Area

This site is located directly west of the intersection of Los Osos Valley Road and Calle Joaquin and is characterized primarily by its use as an agricultural property which is mainly undeveloped. The site drains towards low lying areas and existing wetlands adjacent to Los Osos Valley Road.

The Madonna on Los Osos Valley Road Specific Plan Area development potential could result in an increase of point and non-point sources of contamination that could affect water quality in San Luis Obispo. However, implementation of the proposed LUCE Update policies; compliance with current federal and state requirements;
and the existing City policies identified below, would reduce impacts related to surface and groundwater pollution to less than significant levels.

- **Avila Ranch Specific Plan Area**
  This site is located on the north side of Buckley Road at the far southern edge of the city and consists of some existing buildings along the north and west consisting of service and manufacturing uses with the remainder undeveloped. Onsite runoff is currently directed towards low lying areas in the middle of the site to a portion of San Luis Obispo Creek that runs through the property.

  Future development in accordance with the LUCE Update could result in an increase of point and non-point sources of contamination that could adversely affect water quality. However, implementation of the proposed LUCE Update policies; compliance with current federal and state requirements; and the existing City policies identified below, would reduce impacts related to surface and groundwater pollution to less than significant levels.

- **South Broad Street Special Planning Area**
  The South Broad Street Area encompasses approximately 86 acres and is bounded by the Broad Street on the west, the Union Pacific Railroad on the east, High Street to the north, and Orcutt Road to the south.

  The South Broad Street Special Planning Area is an existing developed area within the urban core of the city. Development of the area could result in infill development which may result in an increase of point and non-point sources of contamination that has the potential to affect water quality in San Luis Obispo, including the adjacent Acacía Creek. However, implementation of the proposed LUCE Update policies; compliance with current federal and state requirements; and the existing City policies identified below, would reduce impacts to less than significant levels.

**Applicable LUCE Update Policies**

The General Plan Land Use Element Update draft includes edits to existing policies and programs for point and non-point sources of contamination that has the potential to affect water quality in San Luis Obispo, while some existing language was retained after critical review:

3.5.4.3 **Air & Water Quality.** Industries locating or expanding in San Luis Obispo shall comply with all applicable air-quality and water-quality regulations.

**Applicable Existing City Policies**

The existing General Plan Conservation and Open Space Element (2006) lists policies for point and non-point sources of contamination which include:

10.3.2 **Maintain water quality.** The City will do the following in to maintain a high level of water quality, and will encourage individuals, organizations, and other agencies to do likewise:

   A. Design and operate its water supply, treatment, and distribution system to prevent adverse effects on water quality (potential point source of pollutants such as chlorine).

   B. Design and operate its wastewater collection and treatment system to prevent adverse effects on water quality (potential point source of pollutants such as untreated sewage and chlorine).

   C. Design, construct, and maintain its facilities such as parks, buildings and grounds, storm water facilities and parking to prevent adverse effects on water quality (potential point sources for pollutants such as petroleum and non-point sources of runoff contaminated with fertilizers, pesticides, litter, and vehicle residues).

   D. Regulate the design, construction, and operation of private facilities over which the City has permit authority to ensure they will not have adverse effects on water quality (potential point sources for, as
examples, sediment from construction and chemicals used in operations, and non-point sources for contaminated runoff).

E. Participate with other agencies, in particular the California Regional Water Quality Control Board, in watershed planning and management.

F. In locations subject to flooding, not allow activities, such as outdoor storage, that would be substantial sources of chemical or biological contamination during a flood, even though buildings associated with the activities would meet flood-protection standards.

G. Establish standards for non-point source water pollution in cooperation with the Regional Water Quality Control Board.

H. Establish a program of baseline water quality testing for City creeks.

I. Identify and protect groundwater recharge areas to maintain suitable groundwater levels and to protect groundwater quality for existing and potential municipal water sources.

In accordance with the California Water Code, the RWQCB has developed a Basin Plan (2011) designed to preserve and enhance water quality and protect the beneficial uses of all regional waters. Water quality objectives for the Central Coastal Basin satisfy state and federal requirements established to protect waters for beneficial uses, and are consistent with existing statewide plans and policies. This would ensure that impacts from point and non-point sources of contamination will not affect water quality in San Luis Obispo Creek and groundwater in the City of San Luis Obispo and remain less than significant.

In addition to the General Plan and Basin Plan policies, the City’s Stormwater Quality Ordinance helps maintain the health, safety, and general welfare of citizens, and protects and enhances the quality of watercourses and water bodies in a manner pursuant to and consistent with the Clean Water Act by reducing pollutants in storm water discharges to the maximum extent practicable by prohibiting non-storm water discharges to the storm drain system, and improving storm water management. No additional policy direction is required. Individual development would be required to undergo separate environmental review, which may result in specific impacts that require project specific mitigation consistent with these policies.

Mitigation Measures

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, the proposed and existing City policies and programs discussed above directly address future development with the potential impact from these Point and non-point source contamination. 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. As such, with the incorporation of the proposed project and adherence to existing City policies and programs discussed above, additional mitigation is not required.

Significance After Mitigation

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.

Impact HWQ-4

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.
Development facilitated by the LUCE Update has the potential to incrementally increase the amount of impervious surface area and place additional demand on existing stormwater conveyance infrastructure, such that new or expanded infrastructure may be needed. However, based on the current regulations of the Regional Water Quality Control Board (RWQCB) reflected in the City’s Stormwater Management Plan (SWMP), effective July 2013, future development and redevelopment projects within the City of San Luis Obispo will be required to comply with the Central Coast Regional Water Quality Control Board Post Construction Requirements.

In accordance with these requirements, future development facilitated by the LUCE Update within the existing City Limits could result in additional runoff from the impervious area, thereby placing limited demand on existing or planned stormwater infrastructure. As development occurs, site-specific stormwater infrastructure needs would be determined on a project-specific basis. Upon compliance with the City’s SWMP and State regulatory requirements, impacts related to the need for additional stormwater infrastructure would be less than significant.

The proposed Airport overlay zone and compatibility criteria changes would not, in and of themselves, result in an environmental impact. However, future development in areas under the given zones could result in impacts and are discussed here in relation to the general development anticipated under the LUCE Update.

**Proposed LUCE Update Development Special Planning 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 development and 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, 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.

Future implementation of the following proposed development area projects and street network changes would have the potential to result in significant impacts related to new development 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.

**Proposed Land Use Element Development Special Planning Areas**

- **Foothill @ Santa Rosa Area:** This is an urbanized area of the city core and is located at the northern end of the city, adjacent to a variety of neighboring land uses including commercial/retail, offices, gas stations and multifamily residential development. Future mixed use development in this area, as envisioned under 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;

- **Caltrans Site:** This area is located near the Marsh Street off-ramp on Highway 101, at the intersection of Higuera Street and Marsh Street, directly adjacent to San Luis Obispo Creek. Future mixed use development in this area, as envisioned under 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;

- **General Hospital Site:** This area is located along the eastern boundary of the city, near the intersection of Johnson Avenue and Bishop Street and represents an urban interface with the hillsides and designated Open Space to the east. Future residential development in this area, as envisioned under 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;

- **Sunset Drive-In Site:** This site is located near the intersection of Prado Road and Elks Lane, at the southern boundary of the city, just east of Highway 101, near San Luis Obispo Creek. The consideration of future mixed use development in this area, as envisioned under 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;

- **Pacific Beach Site:** This site is located adjacent to the Prefumo Creek Commons shopping center, on Los Osos Valley Road, just south of the Madonna Road intersection. The site currently supports the Pacific Beach continuation school. Future Commercial Retail development of this site 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;

- **Calle Joaquin Auto Sales Area:** This portion of Calle Joaquin is parallel to and west of Highway 101, south of the city, and is adjacent to the San Luis Ranch Specific Plan area. Future mixed use development in this area, as envisioned under 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;

- **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 site is primarily undeveloped and serves as a gateway to designated Open Space to the west. Future residential development in this area, as envisioned under 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; and

- **Broad Street @ Tank Farm Road Site:** This site is located at the southern limit of the city. The area currently supports the Marigold Shopping Center and the mixed use commercial/office development adjacent to the Shell Station and some residential development bordering the area to the west and east along Tank Farm Road. Future mixed use development envisioned under 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.

**Proposed Circulation Element Street Network Changes**

- **Transit Center Location on Santa Rosa Street and Higuera Street:** This street intersection is within the city downtown core and represents a gateway into the commercial/retail center of the downtown core. The development of a future Transit Center, as envisioned under 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;

- **Connections to Dalidio Drive from Froom Ranch Way and/or Calle Joaquin:** This area is located west of Highway 101, south of the city, and is part of the San Luis Ranch Specific Plan area. This area is primarily in active agricultural production (row crops), with portions of the site consisting of some agricultural development and areas of undisturbed open space and riparian vegetation associated with San Luis Obispo Creek. The development of a connector 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;
North-South Connection between Tank Farm Road and Buckley Road: Tank Farm and Buckley Roads are parallel streets located at the southern boundary of the city, with the San Luis Obispo Airport and the southern portion of the Chevron Tank Farm located between the two roads. The sites are located adjacent to the Avila Ranch and San Luis Obispo Creek. The potential development of a connector between these two road systems 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;

Buckley Road to Los Osos Valley Road Connections: This area is located along the southwest portion of the city, neighboring areas of relative open space, including agricultural development and some commercial and residential areas. Portions of this area between Buckley Road and Highway 101 to the west remain relatively undeveloped. Areas to the northwest, between Buckley Road and Los Osos Valley Road, contain open areas associated with both San Luis Obispo and Prefumo Creek. Development in this area 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; and

Prado Road Interchange vs. Overpass: The location of a potential Highway 101 interchange or overpass in this area, located at the southern boundary of the city potentially connecting Prado Road (east of the Highway) to the area near San Luis Ranch, Dalidio Drive and the Promenade Shopping Center (west of the Highway), 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.

The potential impacts related to implementation of the above development area projects and street network changes would be considered significant, however, incorporation of the LUCE Update policies and existing City policies discussed below would reduce impacts to less than significant levels.

Proposed Land Use Element Specific Plan Areas

San Luis Ranch Specific Plan Area
This 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 which is mainly undeveloped with the exception to agricultural support structures. The site is relatively flat in topography, and is located within the floodplain of San Luis Obispo and Prefumo Creeks. The majority of the San Luis Ranch property is within the 100-year flood zone as identified by FEMA. The City of San Luis Obispo also documents that the San Luis Ranch property is an area of flooding concern, as it lies within the floodplain of two creeks.

The San Luis Ranch Specific Plan Area development potential, as outlined in the proposed LUCE Update, would result in a more built environment with a significant increase in the amount of impervious surfaces within the area, resulting in increased stormwater runoff and the need for additional stormwater infrastructure. However, as development occurs, site-specific stormwater infrastructure needs would be determined on a project-specific basis. Upon compliance with the City’s SWMP, Engineering Standards, General Plan and City Ordinance requirements discussed above, impacts related to the need for additional stormwater infrastructure would be less than significant.

Madonna on Los Osos Valley Road Specific Plan Area
This site is located directly west of the intersection of Los Osos Valley Road and Calle Joaquin and is characterized primarily by its use as an agricultural property which is mainly undeveloped. The low lying portions of the site near Los Osos Valley road exhibit wetland areas and are subject to flooding during heavy storm events.

The Madonna on Los Osos Valley Road Specific Plan Area development potential, as outlined in the proposed LUCE Update, would result in an incremental increase in the amount of impervious surfaces within the area,
resulting in increased stormwater runoff and the need for additional stormwater infrastructure. However, as development occurs, site-specific stormwater infrastructure needs would be determined on a project-specific basis. Upon compliance with the City’s SWMP, Engineering Standards, General Plan and City Ordinance requirements discussed above, impacts related to the need for additional stormwater infrastructure would be less than significant.

- **Avila Ranch Specific Plan Area**

  This site is located on the north side of Buckley Road at the far southern edge of the city and is characterized by some existing buildings along the north and west consisting of service and manufacturing uses with the remainder undeveloped and used for agriculture (primarily livestock grazing). The site currently drains towards the low lying floodplains associated with a portion of San Luis Obispo Creek, which runs diagonally through the center of the property.

  The Avila Ranch Specific Plan Area development potential would result in an incremental increase in the amount of impervious surfaces within the area, resulting in increased stormwater runoff and the need for additional stormwater infrastructure. However, as development occurs, site-specific stormwater infrastructure needs would be determined on a project-specific basis. Upon compliance with the City’s SWMP, Engineering Standards, General Plan and City Ordinance requirements discussed above, impacts related to the need for additional stormwater infrastructure would be less than significant.

- **South Broad Street Special Planning Area**

  The South Broad Street Area encompasses approximately 86 acres and is bounded by the Broad Street on the west, the Union Pacific Railroad on the east, High Street to the north, and Orcutt Road to the south and is located near Acacia Creek.

  The South Broad Street Special Planning Area is located in an existing developed area within the urbanized core of the city. Development of the area, as outlined in the proposed LUCE Update, could result in increased in-fill construction and could potentially result in construction in the relatively small amount of currently undeveloped areas. This has the potential to result in an increase in the amount of impervious surfaces within the area, resulting in increased stormwater runoff and the need for additional stormwater infrastructure. However, as development occurs, site-specific stormwater infrastructure needs would be determined on a project-specific basis. Upon compliance with the City’s SWMP, Engineering Standards, General Plan and City Ordinance requirements discussed above, impacts related to the need for additional stormwater infrastructure would be less than significant.

**Applicable LUCE Update Policies**

The General Plan Land Use Element Update includes goals, policies and programs to address impacts related to increase in the amount of impervious surfaces within the area, resulting in increased stormwater runoff and the need for additional stormwater infrastructure to less than significant levels. The following policies address potential impacts related to the addition of new development located in this designation.

- 6.4.5 Runoff Reduction and Groundwater Recharge;
- 6.4.6 Development Requirements; and
- 6.5.1 Previously Developed Areas.

Please refer to the policy discussion under Impact HWQ-1 for the full text of the policies and programs listed above.

**Applicable Existing City Policies**

The existing General Plan Conservation and Open Space Element (2006) lists goals, policies and programs related to increase in the amount of impervious surfaces within the area, resulting in increased stormwater runoff and the need for additional stormwater infrastructure. The following policies and goals address potential impacts related to increase in the
amount of impervious surfaces within the area, resulting in increased stormwater runoff and the need for additional stormwater infrastructure and are discussed in detail under Impact HWQ-1:

- 8.3.3 Open space for safety; and
- 10.2.2 Ahwahnee Water Principles.

Adherence to the existing City’s General Plan, the proposed LUCE Update, compliance with the City’s Stormwater Management Plan (SWMP) and the Ordinances discussed above will ensure that the additional impervious areas will not result in impacts related to the need for increases in stormwater infrastructure. No additional policy direction is required. Individual development will be required to undergo separate environmental review, which may result in specific impacts that require project specific mitigation consistent with these policies.

**Mitigation Measures.**
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. However, the proposed and existing City policies and programs discussed above directly address future development with the potential impact to exceed the stormwater drainage system. 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. As such, with the incorporation of the proposed project and adherence to existing City policies and programs discussed above, additional mitigation is not required.

**Significance After Mitigation.**
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.

### 4.9.3. Cumulative Impacts

Cumulative impacts of the proposed LUCE Update include the development within the 100-year floodplain, an increase of impervious surfaces, and percolation to the groundwater basin, the addition of point source and non-point source contaminations, and the need for additional stormwater infrastructure. Overall, development under the LUCE Update would increase development intensity within the city limits, as well as alter the existing hydrologic environment, thereby altering the abundance, natural flow and frequency or water resources of this area.

As a General Plan Update, cumulative impacts are treated somewhat differently than would be the case for a project-specific development. By its nature, the LUCE Update considers cumulative development within the city and potential expansion areas. Thus, cumulative impacts are generally equivalent to project-specific impacts.

Impacts related to hydrology and water quality changes from specific components of the LUCE Update have been addressed individually in the paragraphs above. The combination of these impacts reflects the cumulative impacts of the proposed LUCE Update. As noted above, the existing General Plan, proposed LUCE Update, adherence to the City of San Luis Obispo’s Floodplain Management Regulations, the Waterway Management Program (WMP), the Drainage Design Manual (DDM), Stream Management and Maintenance Program, implementation of the Central Coast Regional Water Quality Control Board Post Construction Requirements, and State regulatory requirements will reduce impacts from new development, as well as buildup of Specific Plan and Special Planning Areas identified in the LUCE Update to a less than significant level.
Please see the next page.
This section describes the existing land use characteristics of the City of San Luis Obispo, describes adopted General Plan land use classifications that have been applied within the city limits and within the City’s Planning Area, and identifies existing plans, policies and other requirements that guide development in the City. This section also evaluates proposed changes to the City’s existing (1994) Land Use Element and (1994) Circulation Element, particularly the potential for the proposed Elements to result in land use conflicts or inconsistencies with existing development patterns and land use requirements.

4.10.1. Setting

The land use setting for the city was described in detail in Section 3.1 of the City of San Luis Obispo General Plan Update Background Report. Please refer to the Background Report, which is hereby incorporated by reference, for additional details related to the City’s land use setting.

a. Regional Setting

The City of San Luis Obispo is located in San Luis Obispo County, which encompasses 3,304 square miles and is bounded by Monterey County to the north, on the west by the Pacific Ocean, to the south by Santa Barbara County, and to the east by Kern County. The County’s population in 2013 was estimated to be 272,177 up from the 2000 population of 246,681. Other cities in the County include Arroyo Grande, Atascadero, Paso Robles, Grover Beach, Morro Bay and Pismo Beach. Major employment sectors in the County include technology, agriculture, viticulture, tourism and education.

b. Local Setting

San Luis Obispo became an incorporated city on February 16, 1856, and is located in the Central Coast Region of California along U.S. Highway 101, midway between San Francisco and Los Angeles. The City is located about 10 miles inland from the Pacific Ocean in a narrow valley between the Santa Lucia Mountains and volcanic hills. The maximum elevation of areas within the City’s Planning Area is approximately 3,000 feet. The city is surrounded by agriculture and open space, including vineyards, field crops, scrub oak, and grasslands. San Luis Obispo Creek bisects the city and is a defining feature of the downtown district.

The San Luis Obispo city limits encompass approximately 8,463 acres (13.2 square miles), while the larger LUCE Planning Subarea encompasses approximately 20.5 square miles. The Planning Subarea includes incorporated land and unincorporated areas that may eventually be annexed and served by the city. In 2013, the city had an estimated population of 45,541 and approximately 20,697 housing units (California Department of Finance, 2014).

c. Existing Land Uses

The City of San Luis Obispo and the area within the LUCE Planning Subarea include a variety of land use types. A brief description of the land use types, uses commonly associated with the land use types, and the land area devoted to individual land use types is provided below. Land use types described below do not directly correspond to General Plan designations or to Zoning, but rather characterize the current physical development on land within the Planning Subarea.

Residential: Residential land uses include: rural residential, single-family residential, and multi-family residential. Rural residential land uses are large parcels with low building coverage, and typically serve as a buffer between urban areas along the city’s outer edges and unincorporated open space areas. All rural residential areas are located outside the city
limits, but within the Land Use and Circulation Planning Subarea. Single-family residential land uses include detached dwelling units such as single-family homes and mobile homes. Multi-family residential land uses include attached dwelling units, such as apartments, condominiums, and duplexes.

In 2012, residential uses totaled 2,314 acres, which is 17.6 percent of the LUCE Planning Subarea. This is the second greatest land use in the area after open space.

**Mixed Use/Multiple Use:** Mixed land uses include parcels on which various uses such as office, commercial, institutional, and residential are combined in a single building or on a single site in an integrated development project with significant functional interrelationships and a coherent physical design. A multiple use parcel includes two or more land uses that are not necessarily functionally related. Mixed use areas occupy 15 acres (less than 1 percent) and multiple use areas occupy 1,668 acres (12.7 percent) of the LUCE Planning Subarea.

**Commercial/Office:** Commercial and office land uses include commercial retail, commercial service, and offices. Commercial retail land uses are neighborhood-, local-, and region-serving retail uses such as grocery stores, drug stores, restaurants, and “big box” stores. Commercial service uses include business and professional services, gas stations, wholesaling and light manufacturing, automotive repair, and beauty salons. Office uses are professional offices and office parks with little or no retail sales, such as doctor, law, and real estate offices.

Retail and service commercial uses occupy 357 acres (2.7 percent) and office uses occupy 47 acres (0.4 percent) of the LUCE Planning Subarea. Commercial and office uses are generally located downtown; along Broad Street; and near U.S. 101, including commercial areas along Los Osos Valley Road (LOVR) and the Madonna Promenade areas.

**Industrial:** Industrial uses include light industry (e.g., business/research parks, warehouses, mini-storage businesses, light manufacturing facilities) as well as heavy industry (e.g., manufacturing, processing, assembling, railroad facilities). Only 384 acres are devoted to industrial use in San Luis Obispo, which is 3 percent of the LUCE Planning Subarea. The largest industrial areas are located below Tank Farm Road near the airport. Another concentration of industrial uses is located along the railroad tracks between Broad Street and Orcutt Road.

**Public/Quasi-Public:** Public and quasi-public uses include areas for governmental or semi-public facilities, such as schools, museums, hospitals, churches, government offices, and community centers. A total of 832 acres or 6.3 percent of the LUCE Planning Subarea is used for public or quasi-public purposes. Public and quasi-public are generally located in the central city, but there are large areas of public uses in the north (i.e., Cal Poly San Luis Obispo), south (i.e., San Luis Obispo County Regional Airport), and along Los Osos Valley Road.

**Parks and Recreation.** Parks and recreation uses include developed parks and other facilities primarily used for recreation, such as swimming pools, sports fields, skate parks, and plazas. Typically, these areas are characterized by a high degree of open space, and a limited number of buildings. Parks and recreation land uses total 387 acres or 2.9 percent of the LUCE Planning Subarea.

**Agriculture/Open Space:** Agricultural and open space land uses include agricultural land and land designated as open space by the City. These areas are largely undeveloped and are used primarily for passive recreation, resource protection, and/or farming. Together agriculture and open space uses accounted for 5,392 acres, or 41 percent of the LUCE Planning Subarea. Open space alone accounted for 37.3 percent of the LUCE Planning Subarea. Agriculture and open space areas are the main land use outside the city limits but within the LUCE Planning Subarea.

**Vacant:** Vacant land includes completely or substantially undeveloped parcels. In 2012, the City of San Luis Obispo had 336 acres vacant land, which is 2.6 percent of the LUCE Planning Subarea.

**Other/Right-of-Way:** Other and right-of-way land uses are generally transportation facilities and utilities, such as power line right-of-way, streets, and railroads. Other and right-of-way land totaled 1,419 acres or 10.8 percent of the LUCE Planning Subarea and were mainly located along existing roadways and railways.

### d. Regulatory Setting

Regional and local plans and programs provide guidance related to land use, development and resource management in the LUCE Planning Subarea. A brief description of some of these plans and programs is provided below.
Regional Plans and Programs

**County of San Luis Obispo General Plan:** The San Luis Obispo County General Plan contains the seven required elements and four optional elements. The General Plan emphasizes strategic growth principles, which incorporate the concepts of smart growth and strategic planning.

**County of San Luis Obispo Land Use Ordinance – San Luis Obispo Planning Area Standards:** The Land Use Ordinance – San Luis Obispo Planning Area Standards includes standards for proposed development in the San Luis Obispo Planning Area. The Ordinance applies to the unincorporated areas in San Luis Obispo’s planning subarea.

**San Luis Obispo County Regional Airport – Airport Land Use Plan (ALUP):** The San Luis Obispo County Regional Airport ALUP was adopted in December 1973, was updated in May 2005, and is currently being updated by the County Airport Land Use Commission (ALUC). The ALUP provides a set of policies and criteria by which the County ALUC evaluates compatibility of land uses around the airport to promote well-being of the public and to protect long term viability of the Airport. The ALUP identifies noise restrictions and safety zones and identifies land uses and density and intensity limitations with each zone.

**San Luis Obispo Local Agency Formation Commission:** A Local Agency Formation Commission (LAFCO) performs regional growth management functions including having approval authority regarding the establishment, expansion, reorganization, and elimination of any city and most types of special districts. LAFCO establishes a sphere of influence for cities and special districts that define the territory that LAFCO independently believes will represent the appropriate and probable future jurisdictional boundary and service area of the subject agency.

**Regional Transportation Plan / Sustainable Community Strategy:** The SLOCOG 2010 Regional Transportation Plan – Sustainable Community Strategy (2010 RTP-SCS) is the current regional transportation plan for SLOCOG’s planning area. The primary purpose of the 2010RTP-SCS is to integrate sustainable communities strategies developed under the Community 2050 regional Blueprint and continue progress in accomplishing the intermodal mix of policies, programs and projects in the adopted RTP, Vision 2025, adopted in 2005.

Specifically, the SCS is a smart growth component of the RTP consisting of 2035Scenario 2 (“Preferred Growth Scenario”). This scenario assumes intensification within the Target Development Areas (TDAs), which are the existing commercial corridors, downtowns, and villages throughout the region. Twenty percent of new residential units are assumed to be accommodated in mixed-use development in the TDAs. The scenario also assumes some reduction in the scale of proposed land use projects that are outside county communities and city spheres of influence. This scenario assumes development continues to occur in the rural unincorporated area to a lesser pace than the recent past.

Senate Bill (SB) 375 mandated California communities to enhance SCS coordination with state and regional agencies consistent with newly developed regional targets set by the California Air Resources Board. SLOCOG’s 2010 RTP-SCS facilitates the compliance with the state mandate and provides a mechanism for more sustainable and efficiently-planned transportation infrastructure, reduce greenhouse gas emissions and improve compatibility with land uses. The SLOCOG 2010 RTP-SCS, in general, is meant to strengthen the connection between transportation and land use planning among all jurisdictions within the planning area by providing goals, policies, investment strategies, financial strategies and plan implementation and monitoring activities. Further, it seeks to develop a true regional perspective connecting transportation infrastructure improvements and land use planning to produce a holistic plan, instead of separate, jurisdictional plans and efforts. This plan strives to maximize and share resources to plan communities sustainably, ensuring they endure well into the future. The 2010 RTP-SCS highlights the state of the region’s transportation network and addresses where investment, maintenance and improvements can be made in all modes of transportation in a manner that supports a more sustainable transportation and land use pattern while making the best use of increasingly scarce financial resources. The 2010 RTP-SCS projects then become part of the region’s transportation improvement plan (TIP) where it is a consideration in funding allocation decisions for the various projects.

**Community 2050 Blueprint:** The Community 2050 Blueprint (the Blueprint) is a regional planning document that seeks to facilitate the implementation of SB 375 and Assembly Bill 32 (AB 32), the Global Warming Solutions Act of 2006. It outlines a program to improve multimodal mobility through a combination of strategies and investments to accommodate growth in transportation demand and reduce congestion that will contribute to a strong economy.
The Blueprint is part of the California Statewide Blueprint program led by the California Business Housing and Transportation Agency through CALTRANS. This program seeks to facilitate a statewide planning effort to build long-range regional growth strategies that support state plans. The Blueprint is a collaborative partnership to examine what the local communities within the region can do now to positively affect needs of the future to provide a blueprint for tomorrow’s growth.

At the regional and local levels, the Blueprint takes the RTP-SCS from a conceptual level incorporating housing and environmental resources with land use and development planning and describes how smart growth strategies may be used to help communities in four sub-regions of the planning area create a more detailed Sustainable Communities Strategy. The Sustainable Communities Strategy will be / has been used to inform the Regional Transportation Plan update. The ultimate goal of the concept is to reduce urban sprawl and maximize resources. The Blueprint assesses transportation, land use, and environmental policies within the region to enable livable, workable, and active communities for the planning period.

**Local Plans and Programs**

City of San Luis Obispo General Plan: The City’s General Plan outlines policies, standards and programs that provide a comprehensive plan for the physical development of the city. Proposed development projects in the city must demonstrate consistency with the goals and policies provided by the General Plan. The City’s General Plan is organized into eight elements adopted between 1994 and 2012, including the mandatory Land Use, Circulation, Housing, Noise, Safety, and Conservation/Open Space Elements; and the optional Parks and Recreation, and Water and Wastewater Elements.

**City of San Luis Obispo Zoning Code**: San Luis Obispo’s Zoning Regulations define 15 zoning districts in three categories: residential, non-residential, and overlay. The residential zones include: low-density residential, medium-density residential, medium-high-density residential and high-density residential. The non-residential zones include: conservation/open space, office, public facility, neighborhood commercial, retail commercial, community commercial, Downtown commercial, tourist commercial, service commercial, manufacturing, and business park. The overlay zones include: planned development, specific plan, historic, mixed-use, and special considerations.

**Downtown Concept Plan (1993)**: The Downtown Concept Plan establishes the downtown as the City’s major commercial, business, cultural and entertainment center that caters to both residents and visitors.

**Railroad District Plan (1998)**: The Railroad District Plan includes policies and architectural standards that establish a public and private investment strategy for land use; open space and recreation; historic preservation; public safety; aesthetics; and traffic, bicycle, and pedestrian circulation in the Railroad District area. The District covers a one-half square mile that follows the railroad right-of-way from Johnson Avenue to Orcutt Road.

**Mid-Higuera Street Enhancement Plan (2001)**: The Mid-Higuera Street Enhancement Plan created a vision for a more attractive and functional future for the Mid-Higuera Street area, where commercial, residential, open space, and public uses create a unique neighborhood.

**Margarita Area Specific Plan (2004)**: This specific plan area covers 420 acres bounded by South Higuera Street, Broad Street, Prado Road, and the ridge of the South Street Hills in the southern portion of San Luis Obispo. The Plan includes infill and transit-oriented development in an area surrounded by transportation corridors and the airport. The Plan area accommodates 868 residential dwelling units, as well as a business park, a neighborhood park, sports fields, and open space areas.

**Airport Area Specific Plan (2005)**: This specific plan includes 1,500 acres along the city’s southern boundary and is bordered by the Margarita Area to the north, South Higuera Street to the west, South Broad Street to the east, and Buckley Road to the south. While some of the area was already developed when the City adopted the Specific Plan, the remaining land will be designed to build on existing land uses with services, manufacturing, business park and airport-related facilities. The plan includes almost ¼ of the area as open space to address remediation and preservation of resources.

**Orcutt Area Specific Plan (2010)**: This area encompasses 231 acres bounded by Orcutt Road to the north and east, the Union Pacific Railroad to the west, and Tank Farm Road to the south. The Plan would provide residential neighborhoods
served by community commercial uses and surrounded by open space. The Plan includes 979 residential dwelling units, as well as a mixed-use development, neighborhood parks, pocket parks, and open space areas.

**South Broad Street Area Draft Plan:** This Plan includes the area between Broad Street and the Union Pacific Railroad from Upham Street to Orcutt Road, excluding properties along McMillan and Duncan. The Area Plan creates a new land use vision to transition from the existing mix of light industrial, housing, and service uses to higher-density infill housing development; mixed use commercial and residential development; and defining public improvements through addition of form-based codes for the area. The South Broad Street Area Plan has been endorsed by the Planning Commission but has not yet been adopted by the City.

**Airport Land Use Compatibility Report:** As Part of the LUCE Update, the City contracted with Johnson Aviation to prepare an Airport Land Use Compatibility Report. The purpose of the Report is to establish the basis for the airport area policies chapter in the General Plan Land Use and Circulation Elements and implementation in the Zoning Code. The Report provides GIS mapping of existing ALUP and proposed airport safety zones, noise impact areas, and overflight areas as well as an analysis of safety and noise issues associated with future operations described in the Airport Master Plan for the San Luis Obispo County Regional Airport. The Report information is based on the State Aeronautics Act, the California Public Utilities code, FAA regulations, the California Airport Land Use Planning Handbook (2011), and an assessment of local conditions.

**San Luis Obispo County Regional Airport Master Plan:** This plan was adopted in 2005 and provides aircraft operations forecasts and identifies capital improvements needed at the Airport to address future aeronautical activity at this commercial service airport. The planned facilities identified in the Master Plan are depicted on the FAA – approved Airport Layout Plan. The FAA-approved forecasts project aircraft operations to exceed 140,000 operations by 2023.

### 4.10.2. Impact Analysis

#### a. Methodology and Significance Thresholds

Land Use-related impacts are considered significant if the proposed LUCE Update would result in one or more of the following conditions:

- Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect.
- Physically divide an established community.
- Conflict with any applicable habitat conservation plan or natural community conservation plan

#### b. Project Impacts

**Impact LU-1**

The proposed LUCE Update would have the potential to conflict with an applicable land use plan of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect. With the implementation of proposed LUCE Update policies, potential land use conflict impacts are considered to be a Class I, 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. 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.

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 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 the ALUC has yet to review the proposed Project and 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, the City Council will need to provide direction to make changes to the project or to determine that an overrule is appropriate. Since an objective of the proposed Project is to provide infill opportunities and encourage residential infill and development, limiting development through changes to the proposed Project does not appear to meet the project objectives.

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. 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.

**Proposed Land Use Element Development Special Planning Areas**

- **Sunset Drive-in Site:** This area is more than one nautical mile from the end of an active runway and therefore is allowed up to 75 persons per acre in Safety Zone 1B according to 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.

- **Calle Joaquin Auto Sales Area:** This area is more than one nautical mile from the end of an active runway and therefore is allowed up to 75 persons per acre in Safety Zones 1B/1C according to 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.
- **Broad Street at Tank Farm Road site.** Land uses near this site include the San Luis Obispo County Airport and commercial uses. This area is within Safety Zone 1C and the ALUP limits non-residential development to 50 persons/acre. 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.

**Proposed Land Use Element Specific Plan Areas**

- **San Luis Ranch Specific Plan Area**
  
  This 132-acre area is located in the southwestern portion of the city, and most of the site is in agricultural production. Nearby land uses include the San Luis Obispo Promenade shopping center to the east; Laguna Lake Park to the north; single family residential development to the west; U.S Highway 101 is to the southeast; and agricultural land with commercial development beyond is south of the site. The entire site is within the City’s LUCE SOI Planning Subarea, but is outside the current city limits. For analysis purposes it is anticipated that implementation of the San Luis Ranch Specific Plan would result in the development of approximately 500 dwelling units and 470,000 square feet of non-residential uses.
  
  The ALUP designates most of this property in Safety Zone 1B which allows only 0.2 dwelling units per acre (1 dwelling unit per 5 acres). A small portion, around 16 acres, is located in Safety Zone 2 which 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 the San Luis Ranch property contains one of the designated open space areas in the ACOS. The ALUP allows increases in density under certain circumstances (use of a detailed area plan and clustered development plan), however, even if residential density is maximized by use of these techniques, residential density envisioned in the proposed Project exceeds that considered as potentially compatible under the ALUP. In addition, non-residential intensity envisioned in the proposed Project has the potential to exceed the 50-75 persons per acre considered to be compatible in the ALUP for Safety Zone 1B, and with the 150 persons per acre in Safety Zone 2.
  
  Development of new residential uses in this area fall within the ALUP-identified 55 dB CNEL noise contour which would not be consistent with Table 5.3 of the ALUP.

  Changes and development supported by the LUCE update for this area 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 higher-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
4.0 Environmental Impact Analysis

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.

Mitigation Measures.

No mitigation measures have been identified to reduce potential inconsistencies with the existing ALUP to a less than significant level.

Significance After Mitigation.

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.

<table>
<thead>
<tr>
<th>Impact LU-2</th>
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<tbody>
<tr>
<td>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>
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The proposed Land Use Element is similar to the existing 1994 Land Use Element in that a mix of land use types would continue to be provided throughout the city, and most of the proposed policy revisions are intended to preserve and enhance existing conditions. Proposed changes to land use and development standards are focused on several areas, primarily the three proposed specific plans, the proposed South Broad Street Area Plan, and eight additional special planning areas. The Circulation Element Update identifies seventeen proposed street network and other circulation system changes. The proposed changes would generally consist of bicycle- and pedestrian-related improvements; transit system additions; street realignments, extensions and connections; freeway on- and off-ramp modifications; and traffic flow modifications.

Proposed LUCE Update Development Areas and Street Network Changes

The development projects and street network changes proposed by the LUCE Update have not been fully designed and subsequent environmental review of projects proposed for implementation will be required after precise projects designs are available for review. It is possible, however, to provide a generalized review of potential land use impacts appropriate for this Programmatic EIR based on the project-related details provided in Section 2.0, Project Description.

Land use conflicts that could have the potential to occur between the proposed development areas and street network changes and adjacent land uses may include impacts associated with nearby agricultural operations such as odors, dust, noise, pesticide or herbicide spraying, and trespass onto agricultural lands. Potential land use conflicts may also result from design- and construction-related issues such as increased noise and traffic, the impairment of views of important visual resources, shadows and loss of privacy, and short- term construction impacts. Conflicts between land uses introduced through the implementation of the proposed development areas and street network changes and nearby existing uses would have the potential to result in significant environmental impacts. These potential impacts, however, are reduced to a less than significant level with the implementation of the existing and proposed LUCE policies identified below.

The proposed Land Use Element Update identifies eight potential special planning areas that would provide a mix of residential units and non-residential uses. As indicated on Project Description Table 2.4-3, the proposed special planning areas include: the Foothill at Santa Rosa area, Caltrans site, General Hospital site, Sunset Drive-in site, Pacific Beach site, Calle Joaquin Auto Sales area, LOVR Creekside area, and the Broad Street at Tank Farm Road site.
Proposed Land Use Element Development Special Planning Areas

- **Foothill @ Santa Rosa**: Land uses adjacent to this area include a mix of residential, commercial, and Cal Poly on the east side of Highway 1. Potential land use conflicts would likely include issues such as increased noise and traffic, the impairment of views of important visual resources, shadows and loss of privacy, and short-term construction impacts.

- **Caltrans Site**: Land uses near this potential development site are primarily open space and industrial uses. Potential land use conflicts would likely include issues such as increased noise and traffic, and short-term construction impacts.

- **General Hospital Site**: Land uses near this site consist of a mix of open space, residential, government and service-related uses. Potential land use conflicts would likely include issues such as increased noise and traffic, the impairment of views of important visual resources, shadows and loss of privacy, and short-term construction impacts.

- **Sunset Drive-in Site**: Land uses near this site include agriculture, open space, commercial and residential areas. Potential land use conflicts would likely include issues such as agricultural-related impacts, increased noise and traffic, the impairment of views of important visual resources, shadows and loss of privacy, and short-term construction impacts.

- **Pacific Beach Site**: Land uses near this site include commercial facilities and residential uses. Potential land use conflicts would likely include issues such as increased traffic and short-term construction impacts.

- **Calle Joaquin Auto Sales Area**: Adjacent land uses generally include agriculture and commercial uses. Potential land use conflicts would likely include issues such as agricultural-related impacts, increased traffic, and short-term construction impacts.

- **LOVR Creekside Area**: Land uses adjacent to this area include a mix of agriculture and residential uses. Potential land use conflicts would likely include issues such as agricultural-related impacts, increased noise and traffic, the impairment of views of important visual resources, shadows and loss of privacy, and short-term construction impacts. This area is currently located in Safety Zone 2 of the ALUP which allows up to 12 units per acre for a total of 276 units in this 23 acre area. Development envisioned in this area is outside of the ALUP-identified 50 d8 CNEL airport noise contour. This appears to be consistent with the ALUP.

- **Broad Street at Tank Farm Road site**: Land uses near this site include the San Luis Obispo County Airport and commercial uses. Potential land use conflicts would likely include issues such as increased traffic and short-term construction impacts.

Land use conflicts between proposed and existing uses would have the potential to result in significant environmental impacts. These potential impacts, however, could be reduced to a less than significant level with the implementation of the existing and proposed LUCE policies identified below.

Proposed Circulation Element Street Network Changes

The Circulation Element Update identifies seventeen proposed street network and other circulation system changes. The proposed changes would generally consist of bicycle- and pedestrian-related improvements; transit system additions; street realignments, extensions and connections; freeway on- and off-ramp modifications; and traffic flow modifications.

The proposed circulation system changes would not generate additional traffic, but would result in changes to existing traffic travel patterns that could result in the redistribution of existing and future traffic into and near residential areas. A substantial increase in traffic volumes in or near residential areas would have the potential to result in land use conflicts. The development of proposed street network changes would also have the potential to result in short-term construction impacts. Land use conflicts that may result from the implementation of proposed street network changes would have the potential to result in significant environmental impacts. These potential impacts, however, are reduced to a less than significant level with the implementation of the existing and proposed LUCE policies identified below.
Proposed Land Use Element Specific Plan Areas

- **San Luis Ranch Specific Plan Area**
  This 132-acre area is located in the southwestern portion of the city, and most of the site is in agricultural production. Nearby land uses include the San Luis Obispo Promenade shopping center to the east; Laguna Lake Park to the north; single family residential development to the west; U.S Highway 101 is to the southeast; and agricultural land with commercial development beyond is south of the site. The entire site is within the City’s LUCE SOI Planning Subarea, but is outside the current city limits. For analysis purposes it is anticipated that implementation of the San Luis Ranch Specific Plan would result in the development of approximately 500 dwelling units and 470,000 square feet of non-residential uses.

  Land use conflicts that could have the potential to occur between the San Luis Ranch Specific Plan and adjacent land uses may include impacts associated with nearby agricultural operations such as odors, dust, noise, pesticide or herbicide spraying, and trespass onto agricultural lands. Potential land use conflicts may also result from design- and construction-related issues such as increased noise and traffic, the impairment of views of important visual resources, shadows and loss of privacy, and short-term construction impacts. Conflicts between land uses on the San Luis Ranch site and nearby existing uses would have the potential to result in significant environmental impacts. 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.

- **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 would have the potential to result in the development of up to 350 residential units and 336,170 square feet of non-residential uses.

  Potential land use conflicts between the proposed Specific Plan and nearby retail and commercial uses would likely include potential increases in noise and traffic, and short-term construction impacts. Conflicts between land uses on the specific plan site and nearby existing uses would have the potential to result in significant environmental impacts. 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.

- **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.

  Conflicts that could have the potential to occur between the Avila Ranch Specific Plan and adjacent land uses may include impacts related to nearby service and manufacturing uses and agricultural operations such as odors, dust, noise, pesticide or herbicide spraying, and trespass onto agricultural lands. Potential land use conflicts may also result from design- and construction-related issues such as increased noise and traffic, the impairment of views of important visual resources, shadows and loss of privacy, and short-term construction impacts. Conflicts between land uses on the Avila Ranch Specific Plan site and nearby existing uses would have the potential to result in significant environmental impacts. 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. The South Broad Street Area Plan implements General Plan policies with three primary tools: a new land use vision, an emphasis on higher-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 adjacent land uses may include impacts related to design and construction issues such as increased noise and traffic, the impairment of views of important visual resources, shadows and loss of privacy, interim conflicts as more residential uses are added to an area with service and manufacturing uses, and short-term construction impacts. Conflicts between proposed uses in the South Broad Street area and nearby existing uses would have the potential to result in significant environmental impacts. 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.

**Proposed Annexations**

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.

Proposed Land Use Element policy 1.12.4 (Annexation in Airport Area) indicates that properties in the Airport Area Specific Plan may be annexed to the City, but only if specified criteria are met, including: the property is contiguous to the existing city limits; is within the existing urban reserve line; is located near to existing infrastructure and capacity is available to serve the proposed development. Annexations of properties in the Airport Area Specific Plan would not change existing physical conditions. Future development on land still to be annexed within the Airport Area Specific Plan has been planned for and addressed through the Specific Plan process and determined by the ALUC to be consistent with the County Airport Land Use Plan.

**Applicable LUCE Update Policies**

The LUCE Update includes policies intended to maintain and enhance existing neighborhood conditions, and to minimize the potential for future land use conflicts between existing land uses, neighborhoods, agricultural areas, and the airport. The policies included in the LUCE Update that would reduce the potential for significant development-related land use conflicts are provided below. (Note to reader: The proposed changes to existing policy statements are shown in strikethrough or underline text.)

**1.3 Urban Edges Character.** The City shall maintain a clear The boundary between San Luis Obispo's urban development and surrounding open land should be clear. Development just inside the boundary shall provide measures to avoid a stark-appearing edge between buildings in the city and adjacent open land. Such measures may include: using new or existing groves or windrows of trees, or hills or other landforms, to set the edge of development; increasing the required side-yard and rear-yard setbacks; and providing open space or agricultural transition buffers.

**1.15.1 County “RMS.”** The City will monitor reports of from the County “resource management system” and advocate adherence to that system’s principle of assuring that there will be adequate resources and environmental protection before development is approved.

**Land Use Element Chapter 2: Conservation and Development of Residential Neighborhoods**

**Neighborhood Identity.** The City shall assist residents to identify and designate neighborhoods. The City will work with residents to address neighborhood specific issues, prepare neighborhood plans, to facilitate development of including enhancing a sense of place within neighborhoods.

**2.1.3 Neighborhood Traffic.** Neighborhoods should be protected from intrusive traffic. All neighborhood street and circulation improvements should favor pedestrians, bicyclists, and local traffic. Vehicle traffic on residential streets should be slow. To foster suitable traffic speed, street design should include measures such as narrow
lanes, landscaped parkways, traffic circles, textured crosswalks, and, if necessary, stop signs, speed humps, and bollards, and on-street parking and sidewalks.

2.1.4 Neighborhood Connections. The City shall provide all areas should have a pattern of streets, pedestrian network, and sidewalk bicycle facilities pattern that promotes neighborhood and community cohesiveness. There should be continuous sidewalks or paths of adequate width, connecting neighborhoods with each other and with public and commercial services and public open space to provide continuous pedestrian paths throughout the City. Connectivity to nearby community facilities (such as parks and schools), open space, and supporting commercial areas shall also be enhanced, but shall not be done in a method that would increase cut-through traffic. (See also the Circulation Element.)

2.2.2 Separation and Buffering. The City shall seek to protect residential areas should be separated or screened from incompatible and detrimental non-residential activities and facilities, including most commercial and manufacturing businesses, traffic arteries, the freeway, and the railroad. Residential areas should be protected from encroachment by detrimental commercial and industrial activities.

2.2.3 Residential Next to Non-residential. In designing development at the boundary between residential and non-residential uses, the City shall make protection of a residential atmosphere is the first priority.

2.2.5 Neighborhood Pattern. The City shall require that all new residential development shall be integrated with existing neighborhoods. Where physical features make this impossible, the new development should create new neighborhoods.

2.2.6 Housing and Businesses. The City shall encourage mixed use projects, where appropriate and compatible with existing and planned development on the site and with adjacent and nearby properties. The City shall support the location of mixed use projects and community and neighborhood commercial centers near major activity nodes and transportation corridors / transit opportunities where appropriate. Where housing can be compatible with offices or other businesses, mixed use projects should be encouraged.

2.2.9 Compatible Development. The City shall require that new housing built within an existing neighborhood should be in-be sited and designed to be compatible with the scale and in character with that of the neighborhood. All multifamily development and large group-living facilities shall be compatible with any nearby, lower density development. Compatibility shall be evaluated using the following criteria:

A. Architectural Character. New Buildings should respect existing buildings which contribute to neighborhood historical or architectural character, in terms of size, spacing, and variety.

B. Front Setback Patterns. New development shall match the typical range of setbacks used in areas adjacent to the project.

C. Landscaping. New development shall repeat or enhance the landscaping provided in parkway areas (if any exist) along street frontages.

D. Rhythm of Development. New development shall reflect the rhythm of existing development in the area including features such as setbacks and facade widths along the front setback. Larger structures, such as multi-family (as allowed by the General Plan land use designation for the site) should replicate the spacing of structural components along the street frontage.

E. Street Orientation. New development shall match the general orientation of existing residential structures in the adjacent area and shall provide an inviting façade facing public streets.

F. Architecture. Architectural compatibility will be assessed based on a combination of factors, including height, scale, mass, form and architectural style. Desired outcome is a smooth transition between existing and proposed development, supporting a quality neighborhood.

G. Privacy and Solar Access. New buildings will respect the privacy and solar access of neighboring buildings and outdoor areas, particularly where multistory buildings or additions may overlook backyards of adjacent dwellings. (See also the City’s Conservation and Open Space Element.)
H. **Preservation of Natural, Historic and Cultural Features.** New development shall:

I. Respect historic context

J. Maintain mature trees on-site to the maximum extent feasible

K. Protect stream corridors and natural drainages

L. **Housing Diversity.** A mix of housing types, and a range of density within a neighborhood is generally desirable (see also Policy 2.1.6).

M. **Parking.** New development:

   a. Outside of the Downtown In-lieu Parking Fee Area, new development will be required to provide adequate off-street parking to match the intended use.

   b. For multi-family, parking shall be sited and designed to minimize the visual impact from the public street.

Land Use Element Chapter 3: Commercial & Industrial Development Policies

3.0.2 **Access.** The City shall require that commercial and industrial uses should have access from arterial and collector streets, and should be designed and located to avoid increasing traffic on residential streets.

Land Use Element Chapter 7: Airport Area Policies

7.3.3 **Airport Land Use Plan.** Land use density and intensity shall carefully balance noise impacts and the progression in the degree of reduced safety risk further away from the runways, consistent with California Airport Land Use Planning Handbook guidelines. The City shall use the Airport Master Plan forecasts of aviation activity as a reasonably foreseeable projection of ultimate aviation activity sufficient for long-term land use planning purposes. Development should be permitted only if it is consistent with the San Luis Obispo County Airport Land Use Plan. Prospective buyers of property which is subject to airport influence should be so informed.

**New Policy Airport Safety Zones.** Airport Safety Zones shall be consistent with California Airport Land Use Planning Handbook guidelines and substantiated by the San Luis Obispo County Airport Master Plan activity forecasts as used for noise planning purposes.

**New Policy Airport Noise Compatibility.** The City shall use the aircraft noise analysis prepared for the Airport Master Plan Environmental Impact Report 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 shall use the 60 dB CNEL aircraft noise contour (FAA and State aircraft noise planning standard) as the threshold for new urban residential areas. Interiors of new residential structures shall be constructed to meet a maximum 45 dB CNEL.

7.3.6 **Internal Open Space.** 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.

Land Use Element Chapter 7: Airport Area Programs

**New Program Airport Overlay Zone.** The City shall create an Airport Overlay Zone category to codify airport compatibility criteria identified in the general plan for those areas located within the Airport Influence Area consistent with the requirements of the California State Aeronautics Act (Cal.Pub. Utilities Code, Section 21670, et. seq.) which establishes statewide requirements for airport land use compatibility planning, the California Airport Land Use Planning Handbook, which is published by the California Department of Transportation Division of Aeronautics to support and amplify the State Aeronautics Act requirements, and other related federal and state requirements relating to airport land use compatibility planning. Implementation of the compatibility policies will be accomplished through the Airport Land Use and Zoning Code.
New Program Airport Land Use and Zoning Code. The City shall update its Zoning Regulations to address allowable uses and development standards for areas located within the Airport Influence Area consistent with the requirements of the State Aeronautics Act, Caltrans Handbook and related state and federal requirements relating to airport land use compatibility. These development standards will include, but not limited to, intensity and density limitations, identification of prohibited uses, infill development, height limitations and other hazards to flight, noise insulation requirements, buyer awareness measures, a sample avigation easement, nonconforming uses and reconstruction and the process for airport compatibility criteria reviews by the City consistent these development standards.

The Circulation Element Update includes the following policies that are specifically intended to reduce the potential for land use conflicts that may result from new development in the City of San Luis Obispo.

Circulation Element Chapter 7: Traffic Management

7.0.3 Growth Management & Roadway Expansion. The City shall manage the expansion of roadways to keep pace with only the level of increased vehicular traffic associated with development planned for in the Land Use Element and under the City’s growth management policies and regional transportation plans.

Circulation Element Chapter 8: Neighborhood Traffic Management

8.1.3 Quality of Life. When requested by neighborhoods, The City shall analyze residential streets shall be analyzed for their livability with regards to multi-modal traffic noise, volumes and speed. Traffic calming or other intervening measures. may be necessary to maintain the resident’s quality of life.

New Policy Regional Cut-Through Traffic. The City shall identify and address regional cut-through traffic issues in the City.

The implementation of the policies identified above would provide project design measures and project-related performance standards that would generally reduce potential land use conflicts to a less than significant level. No additional policy direction is required. Individual development projects are required to undergo separate environmental review, which may identify project-specific impacts that require additional mitigation measures consistent with the requirements of the policies identified above.

Mitigation Measures.

With the implementation of the policies and programs identified above, potential land use compatibility impacts of the LUCE Update would be less than significant and no mitigation measures are required.

Significance After Mitigation.

Implementation of LUCE Update policies and programs would reduce potential land use conflict impacts to a less than significant level. Subsequent development projects would be required to demonstrate compliance with the identified policies, and if required, may be subject to the implementation of additional mitigation measures.

Impact LU-3

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.

Proposed LUCE Update Development Areas and Street Network Changes

The development projects and street network changes proposed by the LUCE Update have not been fully designed and subsequent environmental review of projects proposed for implementation will be required after precise projects designs are available for review. It is possible, however, to provide a generalized review of potential land use impacts appropriate for this Programmatic EIR based on the project-related details provided in Section 2.0, Project Description.
Land use conflicts could have the potential to occur between the proposed development areas and street network changes and applicable habitat conservation plans or natural community conservation plans. These include potential loss of open space and agricultural land, encroachment into wetland or riparian areas with land uses or circulation infrastructure, and potential impacts to natural communities and wildlife corridors. The City has eight Open Space Conservation Plans that guide protection, access, and restoration efforts within these areas of the City’s Greenbelt (listed below).

- Agricultural Master Plan for Calle Joaquin Reserve
- Bishop Peak Natural Reserve
- Cerro San Luis Conservation Plan
- Irish Hills Conservation Plan (2011 Update)
- Johnson Ranch Conservation Plan
- South Hills Conservation Plan
- Stenner Springs Natural Reserve Draft Conservation Plan
- Reservoir Canyon Natural Reserve Conservation Plan

The LUCE update envisions two major development sites immediately adjacent to three of the Conservation Plan Areas:

- **San Luis Ranch Specific Plan Area**
  
  This 132-acre area is located in the southwestern portion of the city, and most of the site is in agricultural production. This area is immediately northwest of the Calle Joaquin Reserve which is addressed in the Agricultural Master Plan for the Calle Joaquin Reserve. Development of the San Luis Ranch area has the potential to conflict with the Calle Joaquin Reserve Plan if the open land envisioned with the Specific Plan area is not contiguous or configured in a way that supports on-going operations of the Agricultural Reserve. In addition, development of the San Luis Ranch property with residential uses may result in impacts related trespass onto agricultural lands or impacts to sensitive wildlife species addressed in the Plan. Conflicts between land uses on the San Luis Ranch site and the adjacent Calle Joaquin Reserve could have the potential to result in significant environmental impacts. These potential impacts, however, are reduced to a less than significant level with the implementation of the existing and proposed LUCE policies identified below.

- **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 located between property covered by two Conservation Plans – Irish Hills and Johnson Ranch Conservation Plans. The LUCE update envisions development occurring in the lower area near Los Osos Valley Road with conservation of the steeper hillsides to the southern end of the property. This open space area has the potential to provide a larger uninterrupted connection between the Irish Hills and the Johnson Ranch Conservation Areas. Conflicts between land uses on the Madonna site and the adjacent Conservation areas could have the potential to result in significant environmental impacts if development were to impact sensitive habitat or to encroach into conserved areas. These potential impacts, however, are reduced to a less than significant level with the implementation of the existing and proposed LUCE policies identified below.

In addition to Conservation Plan areas, the City of San Luis Obispo continues restoration activities in many areas of open space land and along San Luis Obispo Creek, however, infill and development associated with the LUCE update has the potential to impact sensitive habitat areas not covered by conservation plans. These areas of riparian and wildlife corridors, wetlands, habitat, and other natural communities are addressed through policies in the Conservation and Open Space Element, Hillside protection policies in the Land Use Element, and implementation measures in the Zoning Code. Conflicts between land uses introduced through the implementation of the proposed development areas and street network changes and existing habitat would have the potential to result in significant environmental impacts. These potential impacts, however, are reduced to a less than significant level with the implementation of the existing and proposed LUCE policies identified below.
Applicable LUCE Update Policies

The Land Use Element Update includes the following policies and programs that are specifically intended to reduce the potential for plan and policy conflicts that may result from proposed development standards.

1.15.1 Consistent Plans. The City will seek County Board of Supervisors approval amending the County Land Use Element to make it consistent with this element within San Luis Obispo's planning area. The City will work with the County during updates of the County's plan for the San Luis Obispo planning area.

3.3.1.1 Zoning Regulations. The City will amend its Zoning Regulations to implement the commercial and industrial policies changes included in the 2014 General Plan update program.

6.0.1 Resource Planning. It is the policy of the City to protect its unique natural resources and systems by including their considerations and needs within its planning program, and giving those considerations and needs a planning priority co-equal with that accorded other community needs. Under this policy, the City will make provisions for the continued existence of its natural resources within the community. The term “community” thus includes not only the urbanized human community, dominated by urban land development and technological systems, but also a natural community rich in biological and geological diversity, as well as a pre-urban human community with a strong agricultural base.

6.1.2 Open Space Uses. Lands designated Open Space should be used for purposes which do not need urban services, major structures, or extensive landform changes. Such uses include: watershed protection; wildlife and native plant habitat; grazing; cultivated crops; and passive recreation. The City shall require that buildings, lighting, paving, use of vehicles, and alterations to the landforms and native or cultural landscapes on open space lands are minimized, so rural character and resources are maintained. Buildings and paved surfaces, such as parking or roads, shall not exceed the following: where a parcel smaller than ten acres already exists, five percent of the site area; on a parcel of ten acres or more, three percent. (As explained in the Conservation and Open Space Element, the characteristics of an open space area may result in it being suitable for some open space uses, but not the full range.) Parcels within Open Space areas should not be further subdivided.

6.2.2 Development Limits. The City shall establish and maintain clear development limit lines for hills. The City shall have carefully chosen development limit lines, and special design standards for the hills which can be developed. The location of the development limit and the standards should cause development to avoid encroachment into sensitive habitats or unique resources as defined in the Conservation and Open Space Element, and public health and safety problems related to utility service, access, wildland fire hazard, erosion, flooding, and landslides and other geologic hazards. Also, the development limit line and the standards should help protect the City's scenic setting. (Locations of hills planning areas are shown in Figure 6. More precise locations of the development limit line and the urban reserve line are shown on large-scale aerial photographs on file at the Community Development Department; these are part of the Land Use Element.)

6.4.1 Creek and Wetlands Management Objectives. The City shall manage its lake, creeks, wetlands, floodplains, and associated wetlands to achieve the multiple objectives of:

A. Maintaining and restoring natural conditions and fish and wildlife habitat;
B. Preventing loss of life and minimizing property damage from flooding;
C. Providing recreational opportunities which are compatible with fish and wildlife habitat, flood protection, and use of adjacent private properties.
D. Recognizing and distinguishing between those sections of creeks and Laguna Lake which are in previously urbanized areas, such as the Downtown core, and sections which are in largely natural areas. Those sections already heavily impacted by urban development and activity may be appropriate for multiple use whereas creeks and lakeshore in a more natural state shall be managed for maximized ecological value.
Applicable Conservation and Open Space Element Policies

8.3.2 Open space buffers. When activities close to open space resources within or outside the urban area could harm them, the City will require buffers between the activities and the resources. The City will actively encourage individuals, organizations, and other agencies to follow this policy. Buffers associated with new development shall be on the site of the development, rather than on neighboring land containing the open space resource. Buffers provide distance in the form of setbacks, within which certain features or activities are not allowed or conditionally allowed. Buffers shall also use techniques such as planting and wildlife-compatible fencing. Buffers shall be adequate for the most sensitive species in the protected area, as determined by a qualified professional and shall complement the protected area’s habitat values. Buffers shall be required in the following situations:

A. Between urban development -- including parks and public facilities—and natural habitats such as creeks, wetlands, hillsides and ridgelines, Morros, scenic rock outcrops and other significant geological features, and grassland communities, to address noise, lighting, storm runoff, spread of invasive, nonnative species, and access by people and pets (see also the Safety Element for “defensible space” next to wildland fire areas).

B. Between urban development and agricultural operations, to address dust, noise, odors, chemical use, and access by people and pets.

C. Between agricultural operations and natural habitat, to address noise, chemical use, sediment transport, and livestock access.

D. Between new development and cultural resources, to address visual compatibility and access by people.

E. Between new development and scenic resources or the greenbelt, to address view blockage, lighting and noise, and visual transition from urban character to rural character.

F. Urban development or uses located adjacent to the Urban Reserve Line (URL) to provide a transition to open space or greenbelt areas. Transition areas should add to the preservation of open space lands or resources. At a minimum, a 50 foot transition area (preserved in essentially a natural state) shall be provided within the project along the project boundary with the URL, unless the transition area is defined elsewhere in this Element.

8.5.1 Public access. Public access to open space resources, with interpretive information, should be provided when doing so is consistent with protection of the resources, and with the security and privacy of affected landowners and occupants. Access will generally be limited to non vehicular movement, and may be visually or physically restricted in sensitive areas. Public access to or through production agricultural land, or through developed residential lots, will be considered only if the owner agrees (Land for active recreation is typically designated “Park” in the General Plan Land Use Map). The City shall also designate open space areas that are not intended for human presence or activity.

8.6.3 Required mitigation. Loss or harm shall be mitigated to the maximum extent feasible. Mitigation must at least comply with Federal and State requirements. Mitigation shall be implemented and monitored in compliance with State and Federal requirements, by qualified professionals, and shall be funded by the project applicant.

A. For natural habitat that is relatively limited in extent (such as riparian or wetland habitat) mitigation shall consist of creating twice the area of habitat lost, of equal quality, in the following order of preference:
   1. The same kind on the same site.
   2. The same kind on a different site (the site shall be within the San Luis Obispo planning area).
   3. A similar kind (such as seasonal wetland in place of freshwater marsh) on the same site.
   4. A similar kind on a different site (the site shall be within the San Luis Obispo Planning Area).

B. Habitat created as mitigation should be located and designed to minimize the need for long term artificial support (such as supplying wetlands from a well requiring energy and maintenance).

C. For a widespread habitat type or for farmland, mitigation shall consist of permanently protecting an equal area of equal quality, which does not already have permanent protection, within the San Luis Obispo Planning Area.

D. For projects involving enlargement of the urban reserve, mitigation shall consist of permanently protecting an area not previously protected, that is located and that has sufficient size (generally four times the area to be developed) to secure a permanent edge to the city.

E. Individual small projects, each with an incremental impact on an extensive resource, may provide mitigation through payment of a fee, to be used for protecting that resource within the San Luis Obispo planning area.
F. The City may establish or participate in a “mitigation bank,” through which resources are protected in a consolidated location ahead of the need to mitigate impacts of individual, small projects. The City will work with other agencies to assure successful operation of any mitigation bank that is established.

G. Any development that is allowed on a site designated as Open Space or Agriculture, or containing open-space resources, shall be designed to minimize its impacts on open space values on the site and on neighboring land.

1. Hillside development shall comply with the standards of the Land Use Element, including minimization of grading for structures and access, and use of building forms, colors, and landscaping that are not visually intrusive. (See also Chapter 9.21.1)

2. Creek corridors, wetlands, grassland communities, other valuable habitat areas, archaeological resources, agricultural land, and necessary buffers should be within their own parcel, rather than divided among newly created parcels (Figure 8). Where creation of a separate parcel is not practical, the resources shall be within an easement. The easement must clearly establish allowed uses and maintenance responsibilities in furtherance of resource protection.

3. The City will encourage the County not to create new parcels within the greenbelt, with the exception of those permitted under the County’s agriculture cluster incentive. Outside of cluster districts, allowed parcel sizes within the greenbelt should be no smaller, and the number of dwellings allowed on a parcel should be no greater than as designated in the September 2002 San Luis Obispo Area Plan and related County codes. The City will encourage the County to adopt and implement a mandatory cluster district for appropriate areas of the Greenbelt under County jurisdiction to preserve open space qualities, consistent with this Element. The City will encourage other agencies to follow these policies.

Mitigation Measures

With the implementation of the proposed project and adherence to the policies and programs identified above, potential plan and policy consistency impacts of the proposed Land Use Element Update would be less than significant and no mitigation measures are required.

Significance After Mitigation

Implementation of proposed and existing policies and programs would reduce potential plan and policy conflict impacts to a less than significant level.

Impact LU-3

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.

The proposed Circulation Element provides enhanced policy language that addresses 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 circulation.

The Circulation Element Update identifies seventeen potential street network changes that may be considered for future implementation. Each of the proposed street network modifications is described in Project Description Table 2.5-1 (Circulation Element Planning Subarea Proposed Street Network Changes). In general, the proposed street network changes would enhance existing vehicle, bicycle and pedestrian circulation; eliminate a previously proposed bridge over the Union Pacific railroad tracks; provide minor street realignments and connections; alter existing Highway 101/State Route 1 ramps and interchanges; and convert one-way streets to two-way circulation.

These types of street network changes would result in generally localized improvements intended to enhance transportation and minimize circulation-related conflicts. The proposed street network modifications would not result in linear improvements or other street system conditions that would physically divide neighborhoods. For example, the
4.10.3. Cumulative Impacts

The evaluation of potential land use impacts and conflicts provided above considers buildout of the proposed Land Use and Circulation Elements within the city limits and the larger LUCE Planning Subarea. Buildout of the proposed specific plans (San Luis Ranch, Madonna on LOVR, and Avila Ranch) and proposed special planning areas (Foothill at Santa Rosa area, Caltrans site, General Hospital site, Broad Street area, Pacific Beach site, LOVR Creekside area, and the Broad Street at Tank Farm Road site) could result in the development of 2,316 additional residential units in the City. In addition, buildout of existing specific plans, planned and approved projects, and other vacant land could result in the development of approximately 2,588 additional dwelling units. In total, buildout of the proposed Land Use Element could result in approximately 4,904 additional residential units in the City. When added to the 2013 housing supply of 20,697 units, approximately 25,601 dwelling units could be located in the City upon buildout of the proposed Land Use Element. Buildout of the proposed specific plans and special planning areas could provide approximately 1,991,443 additional square feet of non-residential uses in the LUCE planning subarea, while buildout of existing specific plans, planned and approved projects, and other vacant land could result in the development of approximately 3,090,265 square feet of non-residential uses. In total, buildout of the proposed Land Use Element could result in the development of approximately 5,081,708 additional square feet of non-residential uses in the City.

Proposed Land Use Element policies specify appropriate types of development that may occur in the unincorporated areas of the City’s Planning Area, and policies also encourage coordination between the City and San Luis Obispo County regarding future development. For example, Policy 1.15.7 (City-County Agreement indicates that “the City shall maintain a memorandum of understanding with the County, pledging that neither agency will approve a substantial amendment to its plan for San Luis Obispo's planning area without carefully considering the comment and recommendation of the other agency. The key feature of the memorandum would be the City's acceptance of the planned amount of growth and the County's agreement to not allow urban development within the planning area but outside the City.”

The Circulation Element Update identifies seventeen potential street network changes that would enhance existing vehicle, bicycle and pedestrian circulation; eliminate a previously proposed bridge over the Union Pacific railroad tracks; provide minor street realignments and connections; alter existing Highway 101/State Route 1 ramps and interchanges; and convert one-way streets to two-way circulation. Proposed street extensions, such as extensions of Buckley Road, would be constructed to serve planned development in the city. Therefore, the street network changes proposed by the Circulation Element Update would not foster economic or population growth in areas surrounding the city.

Proposed LUCE Update development standards and policies would not apply to any areas located beyond the City’s Planning Area and would not affect areas beyond the established Planning Area boundary. Therefore, the LUCE Update would have less than significant cumulative impacts related to land use incompatibility, plan consistency, of the division of and existing community.
This EIR section provides an evaluation of the potential noise-related effects of implementing the proposed LUCE Update, including short-term construction noise impacts, short- and long-term vibration exposure from construction activities as well as operational sources, long-term traffic noise increases, long-term railroad and aircraft-related noise impacts, and stationary noise impacts.

4.11.1. Setting

The purpose of this section is to describe the existing environmental and regulatory setting with respect to noise. The existing setting is described in detail in Section 6.10, Noise and Vibration, of the corresponding City of San Luis Obispo General Plan Update Background Report. The Background Report contains a detailed description of acoustics fundamentals, including common sources of noise and vibration and effects of noise on humans; existing noise conditions within the city; and applicable federal, state, and local regulations and guidelines that are designed to reduce or minimize adverse effects of noise and vibration on both human health and the built environment. Key findings from the Background Report section are briefly summarized below (please refer to Section 6.10 of the Background Report for detailed information).

a. Environmental Setting

A number of noise-sensitive land uses are present within the city, including various types of residential, schools, hospitals and care facilities, parks and recreation areas, hotels and transient lodging, and place of worship and libraries.

Based on ambient noise level measurements throughout the city, major sources of noise include traffic noise on major roadways, passing trains, and aircraft overflights. Roadway traffic from highways and major arterials is the most significant source of noise affecting sensitive land uses in the city. Since the Existing Conditions section was prepared for Section 6.10 of the Background Report, additional traffic noise modeling was conducted to properly characterize both the baseline and future noise environment. Table 4.11-1 includes a summary of revised existing traffic noise levels based on 2012 traffic data, which supersede the modeled values contained in the Background Report. In terms of noise contours this information is also included in Table 4.11-1. These revised numbers would not visible alter the graphical contours presented in the existing General Plan, due to the scale of the maps. Additional technical data related to the noise setting is included in the EIR technical appendices.
### Table 4.11-1  Summary of Modeled Existing Roadway Traffic Noise Levels

<table>
<thead>
<tr>
<th>Roadway ay Segment</th>
<th>Location</th>
<th>CNEL (dB) at 50 feet from Roadway Centerline</th>
<th>Contour 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 2094 6621</td>
</tr>
<tr>
<td>Highway 101</td>
<td>South of Los Osos Valley</td>
<td>82</td>
<td>714 2258 7140</td>
</tr>
<tr>
<td>Highway 101</td>
<td>North of Madonna</td>
<td>82</td>
<td>757 2393 7568</td>
</tr>
<tr>
<td>Highway 101</td>
<td>South of Madonna</td>
<td>81</td>
<td>651 2058 6508</td>
</tr>
<tr>
<td>Highway 101</td>
<td>North of Route 227</td>
<td>81</td>
<td>703 2222 7027</td>
</tr>
<tr>
<td>Highway 101</td>
<td>South of Route 227</td>
<td>82</td>
<td>763 2412 7626</td>
</tr>
<tr>
<td>Highway 101</td>
<td>North of Route 1 N</td>
<td>81</td>
<td>666 2106 6660</td>
</tr>
<tr>
<td>Highway 101</td>
<td>South of Route 1 N</td>
<td>82</td>
<td>733 2317 7328</td>
</tr>
<tr>
<td>Highway 101</td>
<td>North of California</td>
<td>80</td>
<td>545 1722 5446</td>
</tr>
<tr>
<td>Highway 101</td>
<td>South of California</td>
<td>81</td>
<td>576 1822 5760</td>
</tr>
<tr>
<td>Highway 101</td>
<td>North of Grand</td>
<td>80</td>
<td>457 1445 4571</td>
</tr>
<tr>
<td>Highway 101</td>
<td>South of Grand</td>
<td>80</td>
<td>545 1722 5446</td>
</tr>
<tr>
<td>Highway 101</td>
<td>North of Buena Vista</td>
<td>80</td>
<td>488 1545 4884</td>
</tr>
<tr>
<td>Highway 101</td>
<td>South of Buena Vista</td>
<td>80</td>
<td>455 1439 4550</td>
</tr>
<tr>
<td>Highway 101</td>
<td>North of Northern City Limit</td>
<td>80</td>
<td>488 1545 4884</td>
</tr>
<tr>
<td>Highway 101</td>
<td>South of Northern City Limit</td>
<td>80</td>
<td>488 1545 4884</td>
</tr>
<tr>
<td>Augusta</td>
<td>Bishop to Laurel</td>
<td>56</td>
<td>24 75 239</td>
</tr>
<tr>
<td>Broad</td>
<td>S to South</td>
<td>67</td>
<td>28 88 278</td>
</tr>
<tr>
<td>Broad</td>
<td>Foothill to Lincoln</td>
<td>59</td>
<td>37 117 369</td>
</tr>
<tr>
<td>Broad</td>
<td>Monterey to Marsh</td>
<td>60</td>
<td>81 257 811</td>
</tr>
<tr>
<td>Broad</td>
<td>Marsh to Upham</td>
<td>66</td>
<td>46 144 455</td>
</tr>
<tr>
<td>Broad</td>
<td>Upham to South</td>
<td>68</td>
<td>51 161 508</td>
</tr>
<tr>
<td>Broad</td>
<td>South to Orcutt</td>
<td>71</td>
<td>67 212 671</td>
</tr>
<tr>
<td>Broad</td>
<td>Orcutt to Tank Farm</td>
<td>72</td>
<td>22 68 216</td>
</tr>
<tr>
<td>Broad</td>
<td>Tank Farm to Buckley</td>
<td>71</td>
<td>13 40 127</td>
</tr>
<tr>
<td>Broad</td>
<td>Buckley South</td>
<td>70</td>
<td>17 54 171</td>
</tr>
<tr>
<td>Buchon</td>
<td>High to Santa Rosa</td>
<td>53</td>
<td>25 79 250</td>
</tr>
<tr>
<td>Buchon</td>
<td>Santa Rosa to Johnson</td>
<td>58</td>
<td>11 34 109</td>
</tr>
<tr>
<td>California</td>
<td>Cal Poly to Foothill</td>
<td>64</td>
<td>20 62 197</td>
</tr>
<tr>
<td>California</td>
<td>Foothill to Taft</td>
<td>67</td>
<td>31 98 311</td>
</tr>
<tr>
<td>California</td>
<td>Taft to Monterey</td>
<td>65</td>
<td>63 200 633</td>
</tr>
<tr>
<td>California</td>
<td>Taft to San Luis</td>
<td>65</td>
<td>77 242 767</td>
</tr>
<tr>
<td>Capitolio</td>
<td>Broad to Sacramento</td>
<td>59</td>
<td>91 288 911</td>
</tr>
<tr>
<td>Chorro</td>
<td>Highland to Foothill</td>
<td>60</td>
<td>80 254 802</td>
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<td>Chorro</td>
<td>Foothill to Lincoln</td>
<td>61</td>
<td>83 263 833</td>
</tr>
<tr>
<td>Chorro</td>
<td>Lincoln to Palm</td>
<td>60</td>
<td>62 196 619</td>
</tr>
<tr>
<td>Chorro</td>
<td>Palm to Pismo</td>
<td>60</td>
<td>73 230 727</td>
</tr>
<tr>
<td>Foothill</td>
<td>Los Osos Valley to Patricia</td>
<td>66</td>
<td>74 235 745</td>
</tr>
<tr>
<td>Foothill</td>
<td>Patricia to Broad</td>
<td>68</td>
<td>3 10 30</td>
</tr>
<tr>
<td>Foothill</td>
<td>Broad to Santa Rosa</td>
<td>69</td>
<td>11 36 114</td>
</tr>
<tr>
<td>Roadway ay Segment</td>
<td>Location</td>
<td>CNEL (dB) at 50 feet from Roadway Centerline</td>
<td>Contour Distance (Feet from Roadway Centerline to CNEL dBA)</td>
</tr>
<tr>
<td>-------------------</td>
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<td>----------------------------------------------------------</td>
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<tr>
<td></td>
<td></td>
<td>70</td>
<td>65</td>
</tr>
<tr>
<td>Foothill</td>
<td>Santa Rosa to California</td>
<td>69</td>
<td>5</td>
</tr>
<tr>
<td>High</td>
<td>Higuera to Broad</td>
<td>56</td>
<td>2</td>
</tr>
<tr>
<td>Highland</td>
<td>Patricia to Ferrini</td>
<td>59</td>
<td>5</td>
</tr>
<tr>
<td>Highland</td>
<td>Ferrini to Cal Poly</td>
<td>66</td>
<td>12</td>
</tr>
<tr>
<td>Higuera</td>
<td>Johnson to Santa Rosa</td>
<td>63</td>
<td>11</td>
</tr>
<tr>
<td>Higuera</td>
<td>Santa Rose to Nipomo</td>
<td>67</td>
<td>2</td>
</tr>
<tr>
<td>Higuera</td>
<td>Nipomo to Marsh</td>
<td>67</td>
<td>1</td>
</tr>
<tr>
<td>Higuera</td>
<td>Marsh to South</td>
<td>69</td>
<td>80</td>
</tr>
<tr>
<td>Higuera</td>
<td>South to Madonna</td>
<td>72</td>
<td>13</td>
</tr>
<tr>
<td>Higuera</td>
<td>Madonna to Prado</td>
<td>70</td>
<td>37</td>
</tr>
<tr>
<td>Higuera</td>
<td>Prado to Tank Farm</td>
<td>70</td>
<td>12</td>
</tr>
<tr>
<td>Higuera</td>
<td>Tank Farm to Los Osos Valley</td>
<td>71</td>
<td>3</td>
</tr>
<tr>
<td>Higuera</td>
<td>Los Osos Valley to South of City Limits</td>
<td>66</td>
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<tr>
<td>Industrial</td>
<td>Broad to Sacramento</td>
<td>64</td>
<td>3</td>
</tr>
<tr>
<td>Johnson</td>
<td>Monterey to San Luis</td>
<td>65</td>
<td>15</td>
</tr>
<tr>
<td>Johnson</td>
<td>San Luis to Laurel</td>
<td>67</td>
<td>15</td>
</tr>
<tr>
<td>Johnson</td>
<td>Laurel to Orcutt</td>
<td>63</td>
<td>5</td>
</tr>
<tr>
<td>Laurel</td>
<td>Johnson to Orcutt</td>
<td>66</td>
<td>11</td>
</tr>
<tr>
<td>Los Osos Valley</td>
<td>West City Limits</td>
<td>68</td>
<td>4</td>
</tr>
<tr>
<td>Los Osos Valley</td>
<td>North City Limits to Prefumo Canyon</td>
<td>71</td>
<td>6</td>
</tr>
<tr>
<td>Los Osos Valley</td>
<td>Prefumo Canyon to Madonna</td>
<td>72</td>
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</tr>
<tr>
<td>Los Osos Valley</td>
<td>Madonna to Highway 101</td>
<td>73</td>
<td>24</td>
</tr>
<tr>
<td>Los Osos Valley</td>
<td>Highway 101 to Higuera</td>
<td>72</td>
<td>28</td>
</tr>
<tr>
<td>Los Osos Valley</td>
<td>Highway 101 to Higuera (S. Bypass Road)</td>
<td>72</td>
<td>37</td>
</tr>
<tr>
<td>Madonna</td>
<td>Los Osos Valley to Oceanaire</td>
<td>71</td>
<td>81</td>
</tr>
<tr>
<td>Madonna</td>
<td>Oceanaire to Highway 101</td>
<td>72</td>
<td>46</td>
</tr>
<tr>
<td>Madonna</td>
<td>Highway 101 to Higuera</td>
<td>72</td>
<td>51</td>
</tr>
<tr>
<td>Margarita</td>
<td>E Higuera</td>
<td>58</td>
<td>67</td>
</tr>
<tr>
<td>Marsh</td>
<td>Higuera to Santa Rosa</td>
<td>64</td>
<td>22</td>
</tr>
<tr>
<td>Marsh</td>
<td>Santa Rosa to California</td>
<td>60</td>
<td>13</td>
</tr>
<tr>
<td>Mill</td>
<td>Grand to Chorro</td>
<td>55</td>
<td>17</td>
</tr>
<tr>
<td>Monterey</td>
<td>Chorro to Santa Rosa</td>
<td>60</td>
<td>25</td>
</tr>
<tr>
<td>Monterey</td>
<td>Santa Rosa to California</td>
<td>64</td>
<td>11</td>
</tr>
<tr>
<td>Monterey</td>
<td>California to Highway 101</td>
<td>64</td>
<td>20</td>
</tr>
<tr>
<td>Oceanaire</td>
<td>Los Osos Valley to Madonna (S. Lakeside)</td>
<td>56</td>
<td>31</td>
</tr>
<tr>
<td>Oceanaire</td>
<td>Los Osos Valley to Madonna (Southside)</td>
<td>51</td>
<td>63</td>
</tr>
<tr>
<td>Orcutt</td>
<td>Broad to Laurel</td>
<td>72</td>
<td>77</td>
</tr>
<tr>
<td>Orcutt</td>
<td>Laurel to Johnson</td>
<td>64</td>
<td>91</td>
</tr>
<tr>
<td>Orcutt</td>
<td>Johnson to Tank Farm</td>
<td>69</td>
<td>80</td>
</tr>
<tr>
<td>Orcutt</td>
<td>South City Limits</td>
<td>64</td>
<td>83</td>
</tr>
</tbody>
</table>
Of the road segments modeled, the distance from the roadway centerline to the 60 A-weighted decibel (dBA) contour ranges from 6 feet to 7,626 feet. Residential land uses located within the 60 dBA contour on these road segments are potentially exposed to noise levels above the 60 dBA Community Noise Equivalent Level (CNEL) standard for residential land uses. Some areas where this occurs include:

- Highway 101 and Grand
- Broad south of Orcutt
- California south of Mill
- Chorro south of Center
- Foothill west of Casa
- Johnson between Ella and Bishop
- Los Osos Valley west of Froom Ranch
- Madonna west of Oceanaire
- Santa Rosa north of Boysen

In addition to traffic noise on roadways, freight and passenger trains passing through the city contribute to community noise levels. 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. Aircraft overflights from San Luis Obispo County Regional Airport, located directly south of and adjacent to the City limits, also contribute to the noise environment. Stationary sources in the community include industrial facilities, as well as large institutions such as California Polytechnic State University.

### b. Regulatory Setting

A number of relevant federal, state, regional, and local rules, regulations or policies apply to sources and effects of noise and vibration that are described in detail in Section 6.10 of the Background Report.

Federal and state rules and regulations include the Federal Noise Control Act of 1972, Federal Transit Administration (FTA) guidelines for maximum-acceptable vibration criteria (FTA 2006), the California Governor’s Office of Planning and Research (OPR) State of California General Plan Guidelines (OPR 2003), and the California Department of Transportation (Caltrans) Transportation- and Construction-Induced Vibration Manual (Caltrans 2004). Please note that some of the aforementioned federal regulations do not apply directly to this type of project; however, standards and recommendations that they contain are relied upon for the analysis.

### San Luis Obispo County Regional Airport Land Use Plan

The San Luis Obispo County Regional Airport Land Use Plan (ALUP; 1973, amended May 2005) establishes noise compatibility policies for sensitive land uses within the projected 55 and 60 dBA CNEL airport noise contours associated with the hypothetical maximum use of both runways. (See Figure 6 of the Noise Element of the General Plan) The plan restricts extremely noise sensitive land uses within the 60 dBA CNEL airport noise contour and requires mitigation.
measures for moderately sensitive land uses within the 60 dBA CNEL airport noise contour. The ALUP is the primary document used by the County to help promote compatibility between the airport and the surrounding area.

The Airport Land Use Compatibility Report prepared by Johnson Aviation under contract to the City of San Luis Obispo reviewed the ALUP and determined that the noise contours based on the hypothetical maximum use of both runways would not reflect a reasonably foreseeable forecast of airport operations based on the Airport Master Plan, as required by state law. Because the Airport Master Plan provides the basis of the operational and physical growth of the airport, the EIR that accompanied the Airport Master Plan was reviewed for information related to projected operations. While the time horizon of the 2005 plan projected 140,050 operations by the year 2023, operations in 2013 (just under 68,000) were less than half of the 115,567 operations used in the EIR as the base year estimate taken from the year 1999. The trends predicted in the Master Plan have not been realized and actual aviation activity has been, and continues to be significantly lower than the forecasts. The noise contour shown in the 2006 EIR associated with the Airport Master Plan update are considered to be sufficiently conservative to assess potential future airport-generated noise impacts. Figure 6-5 in the Johnson Aviation Airport Compatibility Report, November 2013 shows the location of the noise contours associated with the forecasted 140,050 operations from the Airport Master Plan EIR (with the appropriate fleet mix, and time of day noise weighting). No new residential uses are proposed within the 60 dB CNEL noise contours associated with forecasted airport operations.

City of San Luis Obispo General Plan Noise Element

The existing City of San Luis Obispo General Plan Noise Element (1996) contains a number of noise policies and standards. These are generally summarized in Tables 4.11-2 and 4.11-3 below.

Land Use and Transportation Noise Sources

Table 4.11-2 summarizes the ranges of noise exposure, for various noise-sensitive land uses, which are considered to be acceptable, conditionally acceptable, or unacceptable in the City of San Luis Obispo. Table 4.11-3 summarizes maximum transportation noise exposure levels for noise-sensitive land uses.

### Table 4.11-2 Community Noise Exposure Levels

<table>
<thead>
<tr>
<th>Land Use Category</th>
<th>Community Noise Exposure (L_{dn} or CNEL, dB)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Acceptable¹</td>
</tr>
<tr>
<td>Residences, Theatres, Auditoriums, Music Halls</td>
<td>&lt;60</td>
</tr>
<tr>
<td>Motels, Hotels</td>
<td>&lt;60</td>
</tr>
<tr>
<td>Schools, Libraries, Hospitals, Nursing Homes, Meeting Halls, Churches, Mortuaries</td>
<td>&lt;60</td>
</tr>
<tr>
<td>Playgrounds</td>
<td>&lt;70</td>
</tr>
<tr>
<td>Office Buildings</td>
<td>&lt;60</td>
</tr>
<tr>
<td>Neighborhood Parks</td>
<td>&lt;65</td>
</tr>
</tbody>
</table>

Notes: CNEL = Community Noise Exposure Level; dB = decibels; dBA = A-weighted decibels; L_{dn} = day-night average sound level.

¹May be permitted without specific noise studies or mitigation.

²Development may be permitted if designed to meet noise exposure standards; a specific noise study is usually required.

³Development with acceptable noise exposure generally is not possible.

Source: City of San Luis Obispo General Plan, Noise Element, 1996.
Table 4.11-3  Maximum Noise Exposure for Noise-Sensitive Uses Due to Transportation Noise Sources

<table>
<thead>
<tr>
<th>Land Use</th>
<th>Outdoor Activity Areas&lt;sup&gt;1&lt;/sup&gt;</th>
<th>Interior Spaces</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>L&lt;sub&gt;in&lt;/sub&gt;/CNEL, dB</td>
<td>L&lt;sub&gt;eq&lt;/sub&gt;/CNEL, dB</td>
</tr>
<tr>
<td>Residential, Hotels, Motels, Hospitals, Nursing Homes</td>
<td>60</td>
<td>45</td>
</tr>
<tr>
<td>Theaters, Auditoriums, Music Halls</td>
<td>–</td>
<td>–</td>
</tr>
<tr>
<td>Churches, Meeting Halls, Office Buildings, Mortuaries</td>
<td>60</td>
<td>–</td>
</tr>
<tr>
<td>Schools, Libraries, Museums</td>
<td>–</td>
<td>–</td>
</tr>
<tr>
<td>Neighborhood Parks</td>
<td>65</td>
<td>–</td>
</tr>
<tr>
<td>Playgrounds</td>
<td>70</td>
<td>–</td>
</tr>
</tbody>
</table>

Notes:
<sup>1</sup>If the location of outdoor activity area is not shown, the outdoor noise standard shall apply at the property line of the receiving use.
<sup>2</sup>As determined for a typical worst-case hour during periods of use.
<sup>3</sup>L<sub>max</sub> indoor standard applies only to railroad noise at locations south of Orcutt Road.
Source: City of San Luis Obispo General Plan, Noise Element, 1996.

New Development and Stationary Noise Sources

New development of noise-sensitive land uses may be permitted only where location or design allow the development to meet the standards of Table 4.11-4, for an existing stationary noise source. Table 4.11-4 summarizes maximum noise exposure levels for noise-sensitive uses due to stationary noise sources. This policy does not apply to noise levels associated with agricultural operations.

The Noise Element of the existing General Plan also contains a number of policies that address procedures for noise mitigation, including specific treatments for sound walls.

Table 4.11-4  Maximum Noise Exposure for Noise-Sensitive Uses Due to Stationary Noise Sources

<table>
<thead>
<tr>
<th>Noise Level Descriptor</th>
<th>Daytime 7 a.m.-10 p.m.</th>
<th>Nighttime 10 p.m.-7 a.m.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hourly L&lt;sub&gt;eq&lt;/sub&gt;, dB</td>
<td>50</td>
<td>45</td>
</tr>
<tr>
<td>Maximum level, dB</td>
<td>70</td>
<td>65</td>
</tr>
<tr>
<td>Maximum impulsive level, dB</td>
<td>65</td>
<td>60</td>
</tr>
</tbody>
</table>

Notes:
As determined at the property line of the receiver. When determining effectiveness of noise mitigation measures, the standards may be applied on the receptor side of noise barriers or other property-line noise mitigation measures.
Sound level measurements shall be made with slow meter response.
Sound level measurements shall be made with fast meter response.
Source: City of San Luis Obispo General Plan, Noise Element, 1996.

City of San Luis Obispo Noise Ordinance

The City’s Noise Control ordinance is found in Chapter 9.12 of the City’s Municipal Code. Applicable sections of the existing noise ordinance are described below.

Section 9.12.050 of the ordinance stipulates that construction or demolition activities that create a noise disturbance across a residential or commercial property line are prohibited between the hours of 7:00 p.m. and 7:00 a.m., Monday through Saturday, and any time on Sundays or holidays. The ordinance further states that, where technically and economically feasible, construction activities shall not exceed the standards identified in Table 4.11-5.
### Table 4.11-5  Maximum Noise Levels for Properties Affected by Construction and Demolition Noise

<table>
<thead>
<tr>
<th>Mobile Equipment¹</th>
<th>Single-Family Residential</th>
<th>Multi-Family Residential</th>
<th>Mixed Residential/Commercial</th>
<th>Business Properties</th>
</tr>
</thead>
<tbody>
<tr>
<td>Daily, 7:00 a.m. to 7:00 p.m., Except Sundays and Legal Holidays</td>
<td>75 dBA</td>
<td>80 dBA</td>
<td>85 dBA</td>
<td>85 dBA</td>
</tr>
<tr>
<td>Daily, 7:00 p.m. to 7:00 a.m. and All Day Sunday and Legal Holidays</td>
<td>60 dBA</td>
<td>65 dBA</td>
<td>70 dBA</td>
<td>85 dBA</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Stationary Equipment¹</th>
<th>Single-Family Residential</th>
<th>Multi-Family Residential</th>
<th>Mixed Residential/Commercial</th>
<th>Business Properties</th>
</tr>
</thead>
<tbody>
<tr>
<td>Daily, 7:00 a.m. to 7:00 p.m., Except Sundays and Legal Holidays</td>
<td>60 dBA</td>
<td>65 dBA</td>
<td>70 dBA</td>
<td>75 dBA</td>
</tr>
<tr>
<td>Daily, 7:00 p.m. to 7:00 a.m. and all day Sunday and Legal Holidays</td>
<td>50 dBA</td>
<td>55 dBA</td>
<td>60 dBA</td>
<td>75 dBA</td>
</tr>
</tbody>
</table>

**Notes:**

¹All mobile or stationary internal combustion engine powered equipment or machinery shall be equipped with suitable exhaust and air intake silencers in proper working order.


Section 9.12.050 of the ordinance also prohibits operating or permitting the operation of any device that creates a vibration which is above the vibration perception threshold of an individual at or beyond the property boundary of the source if on private property or at 150 feet from the source if on a public space or public right-of-way.

Section 9.12.060 of the ordinance identifies exterior noise limits for noise generated by existing residential and nonresidential properties as summarized in Table 4.11-6. These noise level standards are not to be exceeded more than 30 minutes in any one hour. The noise levels in Table 4.11-6 do not apply to construction activities, which are covered under the noise levels summarized in Table 4.11-5.

### Table 4.11-6  Maximum Exterior Noise Limits

<table>
<thead>
<tr>
<th>Zoning Category</th>
<th>Time Period</th>
<th>Noise Level (dBA)</th>
</tr>
</thead>
<tbody>
<tr>
<td>R-1 and R-2, C/OS Low Density Residential</td>
<td>10:00 p.m. – 7:00 a.m.</td>
<td>50</td>
</tr>
<tr>
<td></td>
<td>7:00 a.m. – 10:00 p.m.</td>
<td>55</td>
</tr>
<tr>
<td>R-3 and R-4, High Density Residential</td>
<td>10:00 p.m. – 7:00 a.m.</td>
<td>50</td>
</tr>
<tr>
<td></td>
<td>7:00 a.m. – 10:00 p.m.</td>
<td>55</td>
</tr>
<tr>
<td>O, PF Ltd. Commercial</td>
<td>10:00 p.m. – 7:00 a.m.</td>
<td>55</td>
</tr>
<tr>
<td></td>
<td>7:00 a.m. – 10:00 p.m.</td>
<td>60</td>
</tr>
<tr>
<td>C-N, C-R, C-C, C-T Commercial</td>
<td>10:00 a.m. – 7:00 p.m.</td>
<td>60</td>
</tr>
<tr>
<td></td>
<td>7:00 a.m. – 10:00 p.m.</td>
<td>65</td>
</tr>
<tr>
<td>C-S Light Industrial</td>
<td>Anytime</td>
<td>70</td>
</tr>
<tr>
<td>M Heavy Industrial</td>
<td>Anytime</td>
<td>75</td>
</tr>
</tbody>
</table>

**Notes:**

The noise standard for the specified land use shall not be exceeded for a cumulative period of more than thirty minutes in any hour; or
The noise standard plus 5 dB for a cumulative period of more than fifteen minutes in any hour; or
The noise standard plus 10 dB for a cumulative period of more than five minutes in any hour; or
The noise standard plus 15 dB for a cumulative period of more than one minute in any hour; or The noise standard plus 20 dB for any period of time.

Source: City of San Luis Obispo Municipal Code Section 9.12.060
Based on the existing San Luis Obispo noise ordinance, the maximum interior noise standard for multi-family residential uses is 40 dBA from 10:00 p.m. to 7:00 a.m. and 45 dBA from 7:00 a.m. to 10:00 p.m. These noise levels shall not be exceeded for a cumulative period of more than five minutes in any hour or, the noise standard plus 5 dB for a cumulative period of more than one minute in any hour, or the noise standard plus 10 db for any period of time.

Section 9.12.080.A of the ordinance prohibits refuse collection between the hours of 7:00 p.m. and 6:30 a.m. within or adjacent to a residential area.

Finally, please note that the city uses the City of San Luis Obispo Noise Guidebook as part of their regulatory program and to implement the noise element of the General Plan.

4.11.2. Impact Analysis

a. Methodology and Significance Thresholds

Methodology

To assess potential short-term (construction-related) noise and vibration impacts, potential future development types and locations were identified and evaluated based on typical construction activities. Project-generated construction source noise and vibration levels were determined based on methodologies, reference noise levels, and usage factors from the United States Federal Transit Authority (FTA's) and the California Department of Transportation (Caltrans). Reference levels are noise and vibration emissions for specific equipment or activity types that are well documented and for which their usage is common practice in the field of acoustics.

To assess potential long-term (operation-related) noise impacts due to project-generated increases in traffic, modeling was conducted for major transportation networks in the city consistent with the U.S. Department of Transportation Federal Highway Administration (FHWA) Traffic Noise Model (TNM) and traffic data prepared for the LUCE Update. The analysis is based on the reference noise emission levels for automobiles, medium trucks, and heavy trucks, with consideration given to vehicle volume, speed, roadway configuration, and ground attenuation factors. The modeling conducted does not account for any natural or human-made shielding (e.g., the presence of vegetation, berms, walls, or buildings). As these features can reduce the noise energy between the source and the receptor, leaving them out of the calculations represents worst-case noise levels.

To assess noise and vibration impacts from railroads, the Transit Noise and Vibration Impact Assessment Guidelines (FTA 2006) were used to determine approximate vibration levels in close proximity to rail lines. Noise generated from train passings were also estimated using the Transit Noise and Vibration Impact Assessment Guidelines for assessing railroad and transit noise (FTA 2006). No natural or human-made noise shielding or barriers (e.g., topography, vegetation, berms, walls, or buildings or other attenuation measures) are accounted for, and therefore modeled noise levels are considered “worst case” railroad noise conditions along the length of each corridor.

All sound levels discussed in this section are A-weighted decibels, the frequency of sound most closely related to the way humans perceive sound, unless otherwise noted.

Significance Thresholds

Based on the CEQA Guidelines, a significant noise impact would occur if implementation of the proposed LUCE Update would result in any of the following effects:

(a) Expose people to or generate noise levels in excess of standards established in the proposed General Plan and noise standards, or applicable standards of other agencies (e.g., implementation of development projects under the proposed LUCE Update would involve construction that could result in noise levels that exceed standards [see impact N-1], for transportation-generated noise levels that could exceed standards see impact N-2, and for stationary noise levels that could exceed standards see impact N-3]);
(b) Result in a substantial (e.g., an increase of 3 dB or greater) is typically considered a substantial increase as it is perceivable by the human ear) permanent increase in ambient noise levels in the project vicinity above levels existing without the project (e.g. for substantial transportation-generated noise levels see impact N-2, and for substantial stationary noise levels see impact N-3);

(c) Create a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project (e.g., implementation of development projects under the proposed LUCE Update would involve construction that could result in temporary substantial increases in noise levels [see impact N-1];

(d) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would expose people residing or working in the project area to excessive noise levels (see impact N-4);

(e) For a project within the vicinity of a private airstrip, would expose people residing or working in the project area to excessive noise levels (see impact N-4); or

(f) Expose people to or generate excessive ground vibration or ground-borne noise levels (see impact N-5).

b. Project Impacts

**Impact N-1: 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.

Construction activities associated with future development projects consistent with the proposed LUCE Update could include site preparation (e.g., excavation, grading), laying of concrete foundations, paving, equipment installation, finishing, and cleanup. These activities typically involve the use of noise-generating equipment such as cranes, excavators, dozers, graders, dump trucks, generators, backhoes, compactors, and loaders. Table 4.11-7 shows the maximum noise levels generated by the types of equipment and activities that could be used during construction activities under the LUCE Update.
## Table 4.11-7  Typical Construction Equipment Noise Levels

<table>
<thead>
<tr>
<th>Type of Equipment</th>
<th>Noise Level (dBA L&lt;sub&gt;max&lt;/sub&gt;) at 50 feet</th>
</tr>
</thead>
<tbody>
<tr>
<td>Impact Pile Driver</td>
<td>101</td>
</tr>
<tr>
<td>Vibratory Pile Driver</td>
<td>101</td>
</tr>
<tr>
<td>Blasting</td>
<td>94</td>
</tr>
<tr>
<td>Crane</td>
<td>85</td>
</tr>
<tr>
<td>Excavator</td>
<td>85</td>
</tr>
<tr>
<td>Dozer</td>
<td>85</td>
</tr>
<tr>
<td>Grader</td>
<td>85</td>
</tr>
<tr>
<td>Dump Truck</td>
<td>84</td>
</tr>
<tr>
<td>Generator</td>
<td>82</td>
</tr>
<tr>
<td>Backhoe</td>
<td>80</td>
</tr>
<tr>
<td>Compactor</td>
<td>80</td>
</tr>
<tr>
<td>Front End Loader</td>
<td>80</td>
</tr>
<tr>
<td>Chain Saw</td>
<td>84</td>
</tr>
<tr>
<td>Wood Chipper</td>
<td>75&lt;sup&gt;1&lt;/sup&gt;</td>
</tr>
</tbody>
</table>

**Source:** All noise levels are from FHWA 2006: p.3, unless otherwise noted.

**Notes:**
1. The reference sound level for a wood chipper is based on sound levels provided in Berger, Neitzel, and Kladden 2010.

During land development projects, the site preparation phase of construction results in the most noise generation from the use of heavy-duty equipment such as excavators, graders, dozers, loaders, and trucks. Pile driving and blasting activities are unlikely to be used in most land development projects; however, they are shown in the table for reference. Based on the information provided in Table 4.11-7 and accounting for usage factors of individual pieces of equipment associated with a site preparation phase of construction, construction levels of up to 85 dBA L<sub>max</sub> at 50 feet from a construction site. These levels could exceed the maximum construction noise levels permitted by the City’s Municipal Code adjacent to existing residential or mixed residential/commercial land uses (see Table 4.11-5).

### Applicable LUCE Update Policies

The General Plan Land Use Element Update draft includes edits to existing policies and programs that apply to noise sources as a general matter and could be applicable to construction noise. However, there are no policies in the proposed LUCE Update that directly address construction noise. Policy language edited as part of the proposed LUCE Update is shown using “strikeout” and “underline” format, while some existing language was retained after critical review.

#### 2.1.1 Residential Project Objectives

Residential projects should provide:

- Privacy, for occupants and neighbors of the project;
- Adequate usable outdoor area, sheltered from noise and prevailing winds, and oriented to receive light and sunshine
- Use of natural ventilation, sunlight, and shade to make indoor and outdoor spaces comfortable with minimum mechanical support.
- Pleasant views from and toward the project;
- Security and safety.
- Bicycle facilities consistent with the City’s Bicycle Plan Separate paths for vehicles and for people, and bike paths along collector streets;
- Adequate parking and storage space;
4.0 Environmental Impact Analysis

- Noise and visual separation from adjacent roads and commercial uses. (Barrier walls, isolating a project, are not desirable. Noise mitigation walls may be used only when there is no practicable alternative. Where walls are used, they should help create an attractive pedestrian, residential setting through features such as setbacks, changes in alignment, detail and texture, places for people to walk through them at regular intervals, and planting.)
- Design elements that facilitate neighborhood interaction, such as front porches, front yards along streets, and entryways facing public walkways.
- Buffers from hazardous materials transport routes, as recommended by the City Fire Department.

2.8.1 Enforcing Standards
The City will review, revise if deemed necessary, and actively enforce noise, parking, and property-development and property-maintenance standards. Staff to adequately enforce these standards will be provided.

Applicable Existing City Policies
The existing General Plan Noise Element establishes operational standards for siting of new land uses; however, it contains no policies or programs that address the identification and mitigation of temporary construction noise generated by land development projects on existing sensitive receptors.

As noted in section 4.11.1 above under Regulatory Setting, the City’s existing Noise Control Ordinance in Chapter 9.12 of the Municipal Code contains sets forth maximum noise levels that apply to existing properties that may be affected by construction and demolition activities. However, many construction projects could still exceed the maximum levels permitted by the City’s ordinance, as noted above, particularly in infill areas where adjacent land uses could be affected.

Mitigation Measures
Enforcement of the Noise Element and noise control ordinance with respect to the existing practice that accommodates infill construction activity during the currently allowed hours of 7 AM to 7 PM would reduce impacts to the extent feasible.

Significance After Mitigation
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.

Impact N-2 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 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.

Implementation of the LUCE Update and associated development projects could result in exposure of new sensitive receptors to existing transportation noise sources. The LUCE Update would also generate increases in traffic on local roadways, due to planned increases in population, housing, and employment; which would increase overall traffic noise levels affecting both existing and new sensitive receptors.
Single-family residential development, schools, libraries, hospitals, convalescent homes, and places of worship are considered the most noise-sensitive land uses. High-density and mixed-use residential, commercial, and industrial development is less noise-sensitive because activities are primarily indoors, and typically noise exposure can be reduced through design and material choice (e.g., outdoor activity areas are located in courtyards surrounded by structures, materials with greater insulation are used).

**Roadway Traffic Noise**

Existing and future traffic noise levels throughout the city were modeled to determine the anticipated traffic noise levels along major roadways. For a complete list of roadway segments and the modeled distances from the roadway centerline to the 55, 60, 65, and the 70 dBA Community Noise Equivalent Level (CNEL)/Day-night level (L_{dn}) contour and the noise level at 50 feet from the roadway centerline, see the EIR technical appendices.

Table 4.11-8 shows the existing (baseline) traffic noise levels on modeled roadways, projected 2035 traffic noise levels, and the change in noise levels at 50 feet from the modeled roadways. Existing and future projected traffic noise levels were based on Average Daily Traffic (ADT) data from modeling provided by Kittelson Associates, based on the proposed land use diagram and circulation network in the LUCE Update. As described in the methodology section above, modeled noise levels are considered “worst-case.”

Based on the modeling conducted, future projected traffic volumes on modeled roadways would result in traffic noise increases ranging from 1 to 10 dBA. Based on human perception of noise increase, 3 decibels is perceived as barely noticeable (Egan 2007:21). Thus, with regards to traffic noise specifically, a noticeable increase in noise (i.e., 3 dB or greater), for the purposes of this analysis, would be considered a substantial increase in noise.

<table>
<thead>
<tr>
<th>Roadway Segment</th>
<th>Location</th>
<th>CNEL, dBA at 50 feet from Roadway Centerline</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Baseline (2012)</td>
</tr>
<tr>
<td>Highway 101</td>
<td>North of Los Osos Valley</td>
<td>81.2</td>
</tr>
<tr>
<td>Highway 101</td>
<td>South of Osos Valley</td>
<td>81.5</td>
</tr>
<tr>
<td>Highway 101</td>
<td>North of Madonna</td>
<td>81.8</td>
</tr>
<tr>
<td>Highway 101</td>
<td>South of Madonna</td>
<td>81.1</td>
</tr>
<tr>
<td>Highway 101</td>
<td>North of Route 227</td>
<td>81.5</td>
</tr>
<tr>
<td>Highway 101</td>
<td>South of Route 227</td>
<td>81.8</td>
</tr>
<tr>
<td>Highway 101</td>
<td>North of Route 1 N</td>
<td>81.2</td>
</tr>
<tr>
<td>Highway 101</td>
<td>South of Route 1 N</td>
<td>81.7</td>
</tr>
<tr>
<td>Highway 101</td>
<td>North of California</td>
<td>80.4</td>
</tr>
<tr>
<td>Highway 101</td>
<td>South of California</td>
<td>80.6</td>
</tr>
<tr>
<td>Highway 101</td>
<td>North of Grand</td>
<td>79.6</td>
</tr>
<tr>
<td>Highway 101</td>
<td>South of Grand</td>
<td>80.4</td>
</tr>
<tr>
<td>Highway 101</td>
<td>North of Buena Vista</td>
<td>79.9</td>
</tr>
<tr>
<td>Highway 101</td>
<td>South of Buena Vista</td>
<td>79.6</td>
</tr>
<tr>
<td>Highway 101</td>
<td>North of Northern City Limit</td>
<td>79.9</td>
</tr>
<tr>
<td>Highway 101</td>
<td>South of Northern City Limit</td>
<td>79.9</td>
</tr>
<tr>
<td>Augusta</td>
<td>Bishop to Laurel</td>
<td>56.4</td>
</tr>
<tr>
<td>Broad</td>
<td>S to South</td>
<td>66.9</td>
</tr>
<tr>
<td>Broad</td>
<td>Foothill to Lincoln</td>
<td>58.9</td>
</tr>
<tr>
<td>Broad</td>
<td>Monterey to Marsh</td>
<td>59.8</td>
</tr>
<tr>
<td>Broad</td>
<td>Marsh to Upham</td>
<td>66.3</td>
</tr>
<tr>
<td>Roadway Segment</td>
<td>Location</td>
<td>CNEL, dBA at 50 feet from Roadway Centerline</td>
</tr>
<tr>
<td>-----------------</td>
<td>-----------------------------------</td>
<td>---------------------------------------------</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Baseline (2012)</td>
</tr>
<tr>
<td>Broad</td>
<td>Upham to South</td>
<td>67.8</td>
</tr>
<tr>
<td>Broad</td>
<td>South to Orcutt</td>
<td>71.3</td>
</tr>
<tr>
<td>Broad</td>
<td>Orcutt to Tank Farm</td>
<td>72.1</td>
</tr>
<tr>
<td>Broad</td>
<td>Tank Farm to Buckley</td>
<td>70.6</td>
</tr>
<tr>
<td>Broad</td>
<td>Buckley South</td>
<td>69.8</td>
</tr>
<tr>
<td>Buchon</td>
<td>High to Santa Rosa</td>
<td>53.4</td>
</tr>
<tr>
<td>Buchon</td>
<td>Santa Rosa to Johnson</td>
<td>57.6</td>
</tr>
<tr>
<td>California</td>
<td>Cal Poly to Foothill</td>
<td>64.4</td>
</tr>
<tr>
<td>California</td>
<td>Foothill to Taft</td>
<td>67.4</td>
</tr>
<tr>
<td>California</td>
<td>Taft to Monterey</td>
<td>65.2</td>
</tr>
<tr>
<td>California</td>
<td>Taft to San Luis</td>
<td>65.3</td>
</tr>
<tr>
<td>Capitolio</td>
<td>Broad to Sacramento</td>
<td>58.9</td>
</tr>
<tr>
<td>Chorro</td>
<td>Highland to Foothill</td>
<td>60.4</td>
</tr>
<tr>
<td>Chorro</td>
<td>Foothill to Lincoln</td>
<td>61.5</td>
</tr>
<tr>
<td>Chorro</td>
<td>Lincoln to Palm</td>
<td>59.7</td>
</tr>
<tr>
<td>Chorro</td>
<td>Palm to Pismo</td>
<td>59.6</td>
</tr>
<tr>
<td>Foothill</td>
<td>Los Osos Valley to Patricia</td>
<td>66.3</td>
</tr>
<tr>
<td>Foothill</td>
<td>Patricia to Broad</td>
<td>67.8</td>
</tr>
<tr>
<td>Foothill</td>
<td>Broad to Santa Rosa</td>
<td>69.0</td>
</tr>
<tr>
<td>Foothill</td>
<td>Santa Rosa to California</td>
<td>68.7</td>
</tr>
<tr>
<td>High</td>
<td>Higuera to Broad</td>
<td>56.0</td>
</tr>
<tr>
<td>Highland</td>
<td>Patricia to Ferrini</td>
<td>58.6</td>
</tr>
<tr>
<td>Highland</td>
<td>Ferrini to Cal Poly</td>
<td>66.4</td>
</tr>
<tr>
<td>Higuera</td>
<td>Johnson to Santa Rosa</td>
<td>62.8</td>
</tr>
<tr>
<td>Higuera</td>
<td>Santa Rose to Nipomo</td>
<td>66.8</td>
</tr>
<tr>
<td>Higuera</td>
<td>Nipomo to Marsh</td>
<td>67.5</td>
</tr>
<tr>
<td>Higuera</td>
<td>Marsh to South</td>
<td>68.7</td>
</tr>
<tr>
<td>Higuera</td>
<td>South to Madonna</td>
<td>72.1</td>
</tr>
<tr>
<td>Higuera</td>
<td>Madonna to Prado</td>
<td>69.6</td>
</tr>
<tr>
<td>Higuera</td>
<td>Prado to Tank Farm</td>
<td>70.1</td>
</tr>
<tr>
<td>Higuera</td>
<td>Tank Farm to Los Osos Valley</td>
<td>71.3</td>
</tr>
<tr>
<td>Higuera</td>
<td>Los Osos Valley to South of City Limits</td>
<td>66.4</td>
</tr>
<tr>
<td>Industrial</td>
<td>Broad to Sacramento</td>
<td>64.1</td>
</tr>
<tr>
<td>Johnson</td>
<td>Monterey to San Luis</td>
<td>65.3</td>
</tr>
<tr>
<td>Johnson</td>
<td>San Luis to Laurel</td>
<td>67.0</td>
</tr>
<tr>
<td>Johnson</td>
<td>Laurel to Orcutt</td>
<td>63.4</td>
</tr>
<tr>
<td>Laurel</td>
<td>Johnson to Orcutt</td>
<td>66.0</td>
</tr>
<tr>
<td>Los Osos Valley</td>
<td>West City Limits</td>
<td>67.9</td>
</tr>
<tr>
<td>Los Osos Valley</td>
<td>North City Limits to Prefumo Canyon</td>
<td>71.0</td>
</tr>
<tr>
<td>Los Osos Valley</td>
<td>Prefumo Canyon to Madonna</td>
<td>71.9</td>
</tr>
<tr>
<td>Los Osos Valley</td>
<td>Madonna to Highway 101</td>
<td>72.6</td>
</tr>
</tbody>
</table>

4.0 Environmental Impact Analysis
## Roadway Traffic Noise

One existing railroad line owned by Union Pacific Railroad passes through the Planning Area and is used for both freight and passenger rail service. In 2012, approximately 16 trains per day (13 freight and 3 passenger) passed through the city. Amtrak operates one passenger station within the city on this line at 1101 Railroad Avenue in the downtown vicinity. Noise from railroads is generated primarily by diesel locomotive engines, warning horns, and gate bells at railroad crossings. Other components of noise include diesel exhaust, cooling fans, and railroad car wheel/rail interaction.

Existing railroad noise levels were modeled based on Noise Impact Assessment Guidelines for assessing railroad and transit noise (FTA 2006). 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. Railroad noise modeling is shown below in Table 4.11-9. The modeling summarizes the existing railroad noise levels at 50 feet from the railroad centerline, along with approximate distances.
from the railroad centerlines to the 70 dB, 65 dB, 60 dB, and 55 dB CNEL/Ldn noise contours. As described in the methodology section above, modeled noise levels are considered “worst case.”

Table 4.11-9. Summary of Modeled Existing Railroad Noise Levels

<table>
<thead>
<tr>
<th>Railroad</th>
<th>Location</th>
<th>CNEL (dBA) at 50 feet from Railroad</th>
<th>Distance (Feet from Railroad Centerline to CNEL (dBA) contours)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Union Pacific Railroad</td>
<td>City of San Luis Obispo</td>
<td>69</td>
<td>70 CNEL (dBA)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>42</td>
<td>120</td>
</tr>
</tbody>
</table>

Under the LUCE Update, changes in land use could result in additional residential and mixed-use development along major corridors, within the downtown area, or in various Special Planning Areas near or adjacent to the railroad line. Placement of new residential or other sensitive land uses in close proximity to this active railroad line could potentially expose people to excessive noise levels.

Applicable LUCE Update Policies

Land Use Element

Chapter 2 Conservation and Development of Residential Neighborhoods

2.2.11 Residential Project Objectives

Residential projects should provide:

- Privacy, for occupants and neighbors of the project;
- Adequate usable outdoor area, sheltered from noise and prevailing winds, and oriented to receive light and sunshine;
- Use of natural ventilation, sunlight, and shade to make indoor and outdoor spaces comfortable with minimum mechanical support;
- Pleasant views from and toward the project;
- Security and safety;
- Bicycle facilities consistent with the City’s Bicycle Plan, separate paths for vehicles and for people, and bike paths along collector streets;
- Adequate parking and storage space;
- Noise and visual separation from adjacent roads and commercial uses. (Barrier walls, isolating a project, are not desirable. Noise mitigation walls may be used only when there is no practicable alternative. Where walls are used, they should help create an attractive pedestrian, residential setting through features such as setbacks, changes in alignment, detail and texture, places for people to walk through them at regular intervals, and planting.)
- Design elements that facilitate neighborhood interaction, such as front porches, front yards along streets, and entryways facing public walkways;
- Buffers from hazardous materials transport routes, as recommended by the City Fire Department.

Chapter 3 Commercial & Industrial Development Policies

3.5.7.6 Noise Control

Zoning Regulations and Architectural Review Community Design Guidelines will include measures such as the following to prevent unacceptable noise exposure for residential areas or other noise-sensitive uses: location and shielding of mechanical equipment; location of truck loading, trash collection areas, and loudspeakers; landscaped setbacks or noise attenuation walls. (See also the Noise Element.)
Chapter 4  Downtown

4.0.13  Noise
Obtrusive sounds, including traffic noises and loud music, should be minimized. Desired activities which are noisy should be timed to avoid conflict with other desired activities which need a quiet setting.

Chapter 6  Resource Protection

6.0.1  Resource Mapping
The City shall prepare and maintain geographic information systems-based maps of the City, the urban reserve, and the planning area to guide in land use designations and decision-making. Maps for the city and urban reserve shall be in sufficient detail to highlight all significant natural resources and systems. Maps for the planning area may be at a lesser degree of detail.

The maps shall show at least the following resources: native plant communities, wildlife habitats and corridors, aquatic ecosystems, productive or potentially productive soils (prime or other unique agricultural soil types), viewsheds, terrain, hillsides, greenbelt areas. The overlay maps shall also show development constraints such as flood hazard areas, geological hazard areas, soil hazard areas (subsidence, liquefaction), noise impact areas, airport hazard and noise areas, radiation hazard areas.

The maps shall provide the basis of determining where urban development is most appropriate, and where other needs of the community outweigh the desire or need for urban development. As a result of the findings of these maps, the City shall re-evaluate its land use designations and future plans for undeveloped areas, and revise the LUE land use map accordingly.

6.2.7  Hillside Planning Areas

The City shall urge the County to implement the following hillside policies apply to all hills in and around the City. Specific policies to address particular concerns for the areas as shown on Figure 6 are listed below. For each of these areas, land above the development limit line should be secured as permanent open space. [Note – only the areas with policies applicable to noise are included for the purposes of this analysis]

A.  The Cal Poly - Cuesta Park area includes the hill east of Cal Poly and north of Highway 101 near Cuesta Park. Development should be separated or protected from highway traffic noise and should have adequate fire protection. The City shall urge the County to conduct architectural review should be required for of development of lots fronting Loomis Street to address visual impacts of development.

Chapter 8  Special Planning Areas

8.3.2.2  Specific Plan Content
All specific plans prepared for a Specific Plan Area must meet the requirements of State law and be comprised of four planning frameworks. Within each framework, the specific plan will provide the goals and policies that will guide future decisions on projects within the specific plan area. The plan will also include a detailed implementation plan that will identify responsibilities, financing requirements, and phasing / timing.

The Land Use Framework will include the proposed land use pattern, actual development densities in each subarea on the project site, and development phasing. The framework will also include specifics on development standards.
The Specific Plan prepared will provide complete guidance on the land use provisions that will guide future development within the Planning Area. At a minimum, these provisions will address the following topics. In consultation with City staff, other topics may be required depending on site specific needs.

- **Land Use Classification.** A land use classification system that clearly identifies the uses that may be allowed in each subarea. Based on the land use designations listed under “Performance Standards” section for each site, the specific plan will provide further details on development standards for each subarea. This classification system would use clear terminology to define and further describe allowable uses. Both the land use classification system and the uses allowed within the various subareas will provide for an overall mix of uses.

- **General Site Planning and Development Standards.** These standards will specify the requirements that would be applied to all development and land uses regardless of the applicable land use designation. These would address, as appropriate, sensitive resources; site access requirements; energy efficiency; fences, walls, hedges, buffers, and other screening; outdoor lighting standards; performance standards (e.g., air quality, glare, vibration, etc.), undergrounding of utilities; and other similar topics. Planning should also address how the development will be designed to enhance compatibility with adjacent properties.

- **Development Standards.** Development standards for each land use designation (e.g., building forms, design objectives, land use objectives, height limitations, setback requirements, site coverage requirements, etc.) will be organized in tables and graphically illustrated wherever possible.

- **Housing Mix.** The specific plan will discuss the proposed mix of housing types within the area. In keeping with the City’s Housing Element, affordable housing requirements and density bonus provisions and related incentives will be incorporated as appropriate. A key to the housing component will be to incorporate a mix of housing types, and to provide phasing mechanisms that ensure to the City the development of this housing mix as a part of each phase of the project.

The **Design Framework** will provide detailed design guidelines that will be used as the specific plan is implemented / developed. The purpose of these guidelines will be to establish the expected level of design within the area while still maintaining project flexibility and innovation. The objective of this framework is not to dictate a specific design, but to establish design expectations.

**Chapter 12 Review and Amendment**

12.3.11 **Environmental Review**

The purpose of the City’s Environmental Review process is to develop and maintain a high quality environment now and in the future. Some projects may be exempted from environmental review by state law or city procedures. For those projects subject to environmental review, features to be examined would include but not be limited to, toxic contamination, air quality, open space preservation, sustainability impacts, scenic values and impacts, airport operations, ground slopes, seismic hazards, soil and groundwater characteristics, wildlife habitats, road and rail traffic noise, water and sewer service limits, access and circulation, and historic and archaeological resources, is a formal way to inform the public and decision-makers of the expected consequences of their actions. Two common types of environmental documents are environmental impacts reports and "initial studies." Before relying on private proposals for a major development, such as a specific plan or special-design area, the City should conduct an evaluation of environmental opportunities and constraints, to which a private proposal can respond. The City is committed to early and meaningful participation by the community in the environmental review process to help inform the public and decision-makers of the potential environmental consequences of their actions. Features to be examined would include toxic contamination, airport operations, ground slopes, seismic hazards, soil and groundwater characteristics, significant wildlife habitats, road and rail traffic noise, water and sewer service limits, access and circulation, and historic and archaeological resources.
Circulation Element

Chapter 1  Introduction

1.0  Manage Traffic

San Luis Obispo should:

1. Limit traffic increases by managing population growth and economic development to the rates and levels stipulated by the Land Use Element and implementing regulations. Limit increases in ADT and VMT to the increase in employment within the City’s Urban Reserve.

2. Support county-wide programs that manage population growth to minimize county-wide travel demand.

3. Support county-wide programs that support modal shift while utilizing our existing road system and reducing air pollution and traffic congestion.

4. Provide a system of streets that allow safe travel and alternate modes of transportation throughout the city and connect with Regional Routes and Highways.

5. Manage the use of Arterial Streets, Regional Routes and Highways so that traffic levels during peak traffic periods do not result in extreme congestion, increased headways for transit vehicles, or unsafe conditions for pedestrians or bicyclists.

6. Ensure that development projects and subdivisions are designed and/or retrofitted to be efficiently served by buses, bike routes and pedestrian connections.

7. Consistent with the Land Use Element, allow neighborhood-serving business and provide parks and recreational areas that can be conveniently reached by pedestrians or bicyclists.

8. Protect the quality of residential areas by achieving quiet and by reducing or controlling traffic routing, volumes, and speeds on neighborhood streets.

9. Coordinate the management of San Luis Obispo County Airport and the planning of land uses around the airport to avoid noise and safety problems.

Chapter 8  Neighborhood Traffic Management

8.0.6  Non-Infill Development

In new, non-infill developments, sensitive receptors shall be set back from Regional Routes and Highways, Parkway Arterials, Arterials, Residential Arterials, and Collector streets so that interior and exterior noise standards can be met without the use of noise walls.

8.1.3  Quality of Life

When requested by neighborhoods, The City shall analyze residential streets shall be analyzed for their livability with regards to multi-modal traffic noise, volumes and speed. Traffic calming or other intervening measures may be necessary to maintain the resident's quality of life.

Chapter 10 Truck Transportation

10.0.1  Truck Routes

Commercial trucks should use the City’s established truck routes.

The City shall require STA-sized and CA legal trucks to use the City’s truck routes as designated in Figure 5.
10.1.1 Idling Trucks

Trucks should turn off motors when parked. The City will work with the Air Pollution Control District (APCD) for guidance in establishing standards that address air and noise pollution from idling trucks.

Applicable Existing City Policies

The existing General Plan Noise Element, adopted in 1996, contains community noise exposure standards that apply to both new development and new transportation sources. As noted under the Regulatory Setting above, Table 4.11-2 summarizes the ranges of noise exposure for various noise-sensitive land uses, which are considered to be acceptable, conditionally acceptable, or unacceptable in the City of San Luis Obispo. Table 4.11-3 summarizes maximum transportation noise exposure levels for noise-sensitive land uses.

Applicable policies in the Noise Element of the General Plan that address operational roadway and railroad traffic noise include the following:

1.1 Minimizing Noise.
The numerical noise standards of this element are maximum acceptable noise levels. New development should minimize noise exposure and noise generation.

1.2 Land Use & Transportation Noise Sources

Figure 1 shall be used to determine the appropriateness of designating land for noise sensitive uses, considering noise exposure due to transportation sources. Figure 1 shows the ranges of noise exposure, for various noise-sensitive land uses, which are considered to be acceptable, conditionally acceptable, or unacceptable.

- In acceptable noise environments, development may be permitted without requiring specific noise studies or specific noise-reducing features.
- In conditionally acceptable noise environments, development should be permitted only after noise mitigation has been designed as part of the project, to reduce noise exposure to the levels specified by the following policies. In these areas, further studies may be required to characterize the actual noise exposure and appropriate means to reduce it.
- In unacceptable noise environments, development in compliance with the policies generally is not possible.

1.3 New Development Design and Transportation Noise Sources

New noise-sensitive development shall be located and designed to meet the maximum outdoor and indoor noise exposure levels of Table 1.

1.4 New Transportation Noise Sources

Noise created by new transportation noise sources, including road, railroad, and airport expansion projects, shall be mitigated to not exceed the levels specified in Table 1 for outdoor activity areas and indoor spaces of noise-sensitive land uses which were established before the new transportation noise source.

1.5 Traffic Growth

The noise level standards in Table 1 should be used as criteria for limiting traffic growth on:

- Residential Collector streets, as designated by the Circulation Element;
- Local Streets, as designated by the Circulation Element, which extend through area designated for residential uses.

1.8 Preferred Noise Mitigation Approaches

When approving new development of noise-sensitive uses or noise sources, the City will require noise mitigation in the descending order of desirability shown below. For example, when mitigating outdoor noise exposure, providing distance between source and recipient is preferred to providing berms and walls. Before using a less desirable approach, the applicant must show that more desirable approaches are not effective or that it is not practical to use the preferred approaches consistent with other design criteria based on the General Plan.
1.8.1 Mitigating Noise Sources
A. Arrange activity areas on the site of the noise-producing project so project features, such as buildings containing uses that are not noise-sensitive, shield neighboring noise-sensitive uses;
B. Limit the operating times of noise-producing activities;
C. Provide features, such as walls, with a primary purpose of blocking noise.

1.8.2 Mitigating Outdoor Noise Exposure
A. Provide distance between noise source and recipient;
B. Provide distance plus planted earthen berms;
C. Provide distance and planted earthen berms, combined with sound walls;
D. Provide earthen berms combined with sound walls;
E. Provide sound walls only;
F. Integrate buildings and sound walls to create a continuous noise barrier.

1.8.3 Mitigating Indoor Noise Exposure
A. Achieve indoor noise level standards assuming windows are open
B. Achieve indoor noise level standards assuming windows must be closed (this option requires air conditioning or mechanical ventilation in buildings.)

1.9 Sound Walls
Noise mitigation walls (sound walls) may be used only when it is shown that preferred approaches are not effective or that it is not practical to use the preferred approaches consistent with other design criteria based on the General Plan. Where noise mitigation walls are used, they should help create an attractive pedestrian, residential setting through features such as setbacks, changes in alignment, detail and texture, places for people to walk through them at regular intervals, and planting.

In the Irish Hills Special Design Area and the Margarita and Orcutt expansion areas, dwelling shall be set back from Regional Routes and Highways, Parkway Arterials, Arterials, Residential Arterials, and Collector streets so that the interior and exterior noise standards can be met without the use of noise walls.

1.10 Existing and Cumulative Impacts
The City will consider the following mitigation measures where existing noise levels significantly impact existing noise-sensitive land uses, or where cumulative increases in noise levels resulting from new development significantly impact existing noise-sensitive land uses. (See also Chapter 2 of the Land Use Element, concerning residential neighborhoods.)
A. Rerouting traffic onto streets that can maintain desired levels of service, consistent with the Circulation Element, and which do not adjoin noise sensitive land uses.
B. Rerouting trucks onto streets that do not adjoin noise-sensitive land uses.
C. Constructing noise barriers.
D. Lowering traffic speeds through street or intersection design methods (see also the Circulation Element).
E. Retrofitting buildings with noise-reducing features.
F. Establishing financial programs, such as low cost loans to owners of noise impacted property, or establishment of developer fees to pay for noise mitigation or trip reduction programs.
1.11 Exceptions for Residential Noise Barriers
The City shall approve fence height exceptions to the extent required for effective noise-blocking walls in existing residential street yards, where existing traffic noise levels exceed the standards in Table 1. Such fence height exceptions shall be conditioned to minimize the aesthetic impacts to neighborhood character as perceived from the street and sidewalk. Such walls should help create an attractive pedestrian, residential setting through features such as setbacks, change in alignment, detail and texture, places for people to walk through them at regular intervals, and planting.

1.12 Development Review
The Community Development Department shall review new public and private development proposals to determine conformance with the policies of this element.

1.13 Noise Studies
Where a project may expose people to existing noise levels or projected built-out noise levels exceeding acceptable limits, the City shall require the applicant to provide a noise study early in the review process so that noise mitigation may be included in the project design. The City will maintain standards and procedures for the preparation of noise studies. (See the Noise Guidebook for specifics.)

1.14 Assuring Compliance
The City will ensure that required noise mitigation measures are carried out as a project is built, including enforcement of the State Building Code Chapter 35, “Sound Transmission Control,” as amended, and the “Noise Insulation Standards” (California Code of Regulations, Title 24).

1.15 Monitoring
The City will monitor compliance with required noise mitigation measures after completion of projects.

1.16 Vehicle Code Enforcement
The City will enforce within its jurisdiction California Vehicle Code sections on loud vehicle exhaust systems and sound amplification systems, and ask the California Highway Patrol and the County Sheriff’s Office to do so within their jurisdictions.

Buildout of the proposed LUCE Update could result in an increase of 3 dB or greater on several roadway segments in the city by the year 2035. This increase could have an adverse effect on both existing and new sensitive land uses in the city. However, the City’s Noise Element contains policies that apply to transportation projects that could increase traffic noise levels on existing streets or rail lines. Similarly, existing and proposed LUCE Update policies would serve to mitigate potential increases in roadway traffic noise that could occur as a result of overall development through 2035.

Implementation of the proposed LUCE Update could also introduce new sensitive land uses in close proximity to existing transportation noise sources that could exceed applicable thresholds contained in the City’s Noise Element. However, existing Noise Element policies and standards require all new development to comply with the City’s adopted noise standards, noise mitigation procedures, and sensitive land use siting policies. Site-specific noise studies would require mitigation measures, if necessary, to ensure that development meets noise standards.

Therefore, future planned development and updates to the city’s circulation system under the proposed LUCE Update would not expose people to excessive noise levels from roadway or railroad traffic noise. As such, with the incorporation of the proposed policies and programs and adherence to existing City policies and programs discussed above, additional mitigation is not required.

Mitigation Measures
None required.
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.

Stationary (and area) sources include landscape and building maintenance activities, stationary mechanical equipment (e.g., pumps, generators, HVAC units), garbage collection activities, commercial and industrial activities, and other stationary and area sources such as people’s voices, amplified music, and public address systems. Implementation of the 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.

Applicable LUCE Update Policies

Refer to those listed above under the Impact N-2.

Applicable Existing City Policies

Refer to those listed above under the Impact N-2. In addition, the existing General Plan Noise Element, adopted in 1996, contains community noise exposure standards that apply to both new development and new stationary sources. As noted under the Regulatory Setting above, Table 4.11-2 summarizes the ranges of noise exposure for various noise-sensitive land uses, which are considered to be acceptable, conditionally acceptable, or unacceptable in the City of San Luis Obispo. Table 4.11-5 summarizes maximum stationary noise exposure levels for noise-sensitive land uses.

Applicable policies in the Noise Element, in addition to those listed above under N-2) that address operational stationary also noise include the following:

1.6 New Development and Stationary Noise Sources

New development of noise-sensitive land uses may be permitted only where location or design allow the development to meet the standards of Table 2 (Table 4.11-4 of this document), for existing stationary noise sources.

1.7 New or Modified Stationary Noise Sources

Noise created by new stationary; noise sources, or by existing stationary noise sources which undergo modifications that may increase noise levels, shall be mitigated to not exceed the noise level standards of Table 2, for lands designated for noise-sensitive

Implementation of the 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, the City’s Noise Element contains policies that apply to new stationary sources, and, similarly, existing and proposed LUCE Update policies would serve to mitigate potential increases in stationary noise that could occur as a result of overall development through 2035.

Implementation of the proposed LUCE Update could also introduce new sensitive land uses in close proximity to existing stationary noise sources that could exceed applicable thresholds contained in the City’s Noise Element. However, existing Noise Element policies and standards require all new development to comply with the City’s adopted noise standards, noise mitigation procedures, and sensitive land use siting policies. Site-specific noise studies would require mitigation measures, if necessary, to ensure that development meets noise standards.
Therefore, implementation of the LUCE Update would not expose people to excessive noise levels from stationary sources. As such, with the incorporation of the proposed policies and programs and adherence to existing City policies and programs discussed above, additional mitigation is not required.

Mitigation Measures

None required.

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.

The San Luis Obispo County Regional Airport ALUP establishes noise compatibility policies for sensitive land uses within the projected 55 and 60 dBA CNEL airport noise contours associated with the hypothetical maximum use of both runways. The plan restricts extremely noise sensitive land uses within the 60 dBA CNEL airport noise contour and requires mitigation measures for moderately sensitive land uses within the 60 dBA CNEL airport noise contour (County of San Luis Obispo 2005).

The proposed update to the General Plan Land Use Element includes policies that would guide future updates to two existing specific plans within close proximity to the Airport, including the Airport Area Specific Plan and the Margarita Area Specific Plan. As shown in Figure 2.4-1, the Margarita Area Specific Plan area is located directly north of the Airport Area Specific Plan area and northwest of the Airport, while the Airport Area lies immediately adjacent to and north of the Airport.

- The Airport Area Specific Plan (AASP) is addressed in Chapter 7 of the existing Land Use Element. The Airport Area chapter of the 1994 Land Use Element focused on the need to develop a specific plan for the area surrounding the airport, which is located south of the current city limits. Since that time, the City adopted and is currently in the process of updating the Airport Area Specific Plan to address the Chevron remediation and redevelopment. Proposed changes to this chapter of the Land Use Element that address the AASP provide updates to reflect current conditions. While not directly referenced in Chapter 7, the Avila Ranch area is located within the AASP and future land use changes proposed for the Avila Ranch are supported by performance standards in Chapter 8 of the Land Use Element. Subsequent amendment to the AASP will be required to accommodate changes from the current designation of Business Park to a mix of residential densities and a small commercial center for the Avila Ranch.

- Portions of the Margarita Area Specific Plan (MASP) area are located within the 55 dBA and 60 dBA noise contours, as shown on Figure 2.4-1. A specific plan was approved for the area in 2004 that included 868 residential units, a business park, neighborhood park, sports fields, and open space areas. Policy 8.3.2.3 in the proposed LUCE Update (SP-1, Margarita Area Specific Plan Update) specifies that the City shall consider the area as potentially appropriate to accommodate additional housing. The adopted Margarita Area Specific Plan addresses airport compatibility and consistency with the adopted noise standards in the ALUP, and includes standards that apply to indoor noise exposure for residential and other sensitive uses within the 55 dBA contour. The existing Specific Plan places a 580 unit cap on the number of residential units allowed within the 55 dBA noise contour (City of San Luis Obispo 2004). This cap is consistent with Section 6.2 of the ALUP, which includes the residential unit cap as well as additional noise standards that apply to residential or other noise-sensitive uses within the Margarita Planning Area (County of San Luis Obispo 2005). Future changes to the MASP to accommodate additional residential development will need to address noise exposure from all sources of noise, including airport operational noise.
Applicable LUCE Update Policies

The proposed LUCE update includes edits to existing policies and programs that address consistency with the ALUP and airport noise compatibility. Policy language edited as part of the proposed LUCE Update is shown using “strikeout and underline” format, while some existing language was retained after critical review.

Land Use Element

7.3.3 Airport Land Use Plan

Land use density and intensity shall carefully balance noise impacts and the progression in the degree of reduced safety risk further away from the runways, consistent with California Airport Land Use Planning Handbook guidelines. The City shall use the Airport Master Plan forecasts of aviation activity as a reasonably foreseeable projection of ultimate aviation activity sufficient for long-term land use planning purposes. Prospective buyers of property subject to airport influence should be so informed.

New Policy Airport Noise Compatibility

The City shall use the aircraft noise analysis prepared for the Airport Master Plan Environmental Impact Report 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 shall use the 60 dB CNEL aircraft noise contour (FAA and State aircraft noise planning standard) as the threshold for new urban residential areas. Interiors of new residential structures shall be constructed to meet a maximum 45 dB CNEL.

New Policy County Airport Land Use Plan

The City shall continue to work with the County Airport Land Use Commission to strive to achieve consistency between the County Airport Land Use Plan and the City’s General Plan. If consistency cannot be achieved, the City shall preserve and maintain as a plausible alternative its constitutional land use authority to overrule the Airport Land Use Commission with regard to adopting General Plan policies that are consistent with the purposes of the California Airport Land Use Planning Handbook, State Aeronautics Act and State Law. Applicable sections of the Zoning Regulations and Specific Plans shall be amended accordingly.

NEW PROGRAMS

7.14 Airport Overlay Zone

The City shall create an Airport Overlay Zone category to codify airport compatibility criteria identified in the general plan for those areas located within the Airport Influence Area consistent with the requirements of the California State Aeronautics Act (Cal.Pub. Utilities Code, Section 21670, et. seq.) which establishes statewide requirements for airport land use compatibility planning, the California Airport Land Use Planning Handbook, which is published by the California Department of Transportation Division of Aeronautics to support and amplify the State Aeronautics Act requirements, and other related federal and state requirements relating to airport land use compatibility planning. Implementation of the compatibility policies will be accomplished through the Airport Land Use and Zoning Code.

7.15 Airport Land Use and Zoning Code

The City shall update its Zoning Regulations to address allowable uses and development standards for areas located within the Airport Influence Area consistent with the requirements of the State Aeronautics Act, Caltrans Handbook and related state and federal requirements relating to airport land use compatibility. These development standards will include, but not limited to, intensity and density limitations, identification of prohibited uses, infill development, height limitations and other hazards to flight, noise insulation requirements, buyer awareness measures, nonconforming uses and reconstruction and the process for airport compatibility criteria reviews by the City consistent these development standards.
Circulation Element

1.1 Manage Traffic

San Luis Obispo should:

1. Limit traffic increases by managing population growth and economic development to the rates and levels stipulated by the Land Use Element and implementing regulations. Limit increases in ADT and VMT to the increase in employment within the City’s Urban Reserve.

2. Support county-wide programs that manage population growth to minimize county-wide travel demand.

3. Support county-wide programs that support modal shift while utilizing our existing road system and reducing air pollution and traffic congestion.

4. Provide a system of streets that allow safe travel and alternate modes of transportation throughout the city and connect with Regional Routes and Highways.

5. Manage the use of Arterial Streets, Regional Routes and Highways so that traffic levels during peak traffic periods do not result in extreme congestion, increased headways for transit vehicles, or unsafe conditions for pedestrians or bicyclists.

6. Ensure that development projects and subdivisions are designed and/or retrofitted to be efficiently served by buses, bike routes and pedestrian connections.

7. Consistent with the Land Use Element, allow neighborhood-serving business and provide parks and recreational areas that can be conveniently reached by pedestrians or bicyclists.

8. Protect the quality of residential areas by achieving quiet and by reducing or controlling traffic routing, volumes, and speeds on neighborhood streets.

9. Coordinate the management of San Luis Obispo County Airport and the planning of land uses around the airport to avoid noise and safety problems.

11.0.2 County Aircraft Operations

The City shall work with the County to continue to appropriately address aircraft operations so that noise and safety problems are not created in developed areas or areas targeted for future development by the City’s Land Use Element.

11.1.4 Update of the Airport Land Use Plan

The City shall work with the County Airport Land Use Commission to complete its update of the Airport Land Use Plan for the San Luis Obispo County Airport in regard to significant changes in noise, adjacent land impacts, and safety zones.

Applicable Existing City Policies

The Noise Element in the City’s General Plan, adopted in 1996, contains standards that apply to both new development and new transportation noise sources (see Regulatory Setting above in this section for details). The following policies in the Noise Element are generally applicable to airport noise exposure:

1.4 New Transportation Noise Sources

Noise created by new transportation noise sources, including road, railroad, and airport expansion projects, shall be mitigated to not exceed the levels specified in Table 1 for outdoor activity areas and indoor spaces of noise-sensitive land uses which were established before the new transportation noise source.

1.23 Relationship to Noise Ordinance

Noise elements are directed at minimizing future noise conflicts, while noise ordinances are intended mainly to resolve noise conflicts. A noise control ordinance addresses noise generated by industrial, commercial,
agricultural, and residential uses, which are not subject to Federal or State noise regulations. The regulation of noise sources such as traffic on public roads, rail line operations, and aircraft in flight is preempted by Federal and State regulations, meaning that such sources generally cannot be controlled by a local ordinance. The Noise Element can address the prevention of noise conflicts from all sources, however. The standards of a noise control ordinance should be consistent with the Noise Element, to achieve consistency in the implementation of noise control programs, and to provide businesses with consistent design criteria for development or expansion. The City has adopted, occasionally amends, and enforces a noise control ordinance, which is chapter 9.12 of the Municipal Code.

Adoption of the proposed LUCE Update would include updates to two specific plan areas within close proximity or adjacent to San Luis Obispo County Regional Airport. Additional residential uses could be located within the ALUP’s 55 dBA or 60 dBA noise contours under a potential update to the Margarita Area Specific Plan. However, the proposed LUCE Update policies and programs discussed above would ensure that these specific plan updates would be consistent with current ALUP noise compatibility standards, as well as ongoing coordination with the County Airport Land Use Commission to ensure that residential uses are not located within the 60 dBA noise contour. As such, with the incorporation of the proposed policies and programs and adherence to existing City policies and programs discussed above, additional mitigation is not required.

Mitigation Measures

None required.

<table>
<thead>
<tr>
<th>Impact N-5 Exposure to Excessive Vibration Levels.</th>
</tr>
</thead>
<tbody>
<tr>
<td>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.</td>
</tr>
</tbody>
</table>

Ground vibration may result from short-term construction activities as well as long-term exposure from transportation noise sources (i.e., passenger trains, freight trains, buses). Short-term and long-term vibration exposures are discussed separately below.

(a) Short-Term Construction-Related Ground Vibration Exposure. Construction activities have the potential to result in varying degrees of temporary ground vibration, depending on the specific construction equipment used and activities involved. Vibration generated by construction equipment spreads through the ground and diminishes with increases in distance. Construction-related ground vibration is normally associated with impact equipment such as pile drivers, jackhammers, and the operation of some heavy-duty construction equipment, such as dozers and trucks. Blasting activities also generate relatively high levels of ground vibration. Table 4.11-10 displays ground vibration levels for typical construction equipment. The effects of ground vibration may be imperceptible at the lowest levels, result in low rumbling sounds and detectable vibrations at moderate levels, and high levels of vibration can cause sleep disturbance in places where people normally sleep or annoyance in buildings that are primarily used for daytime functions and sleeping.

Ground vibration can also potentially damage the foundations and exteriors of existing structures even if it does not result in a negative human response. Pile driving and blasting activities produce the highest levels of ground vibration, as shown in Table 4.11-10, and can result in structural damage to existing buildings. Future development as a result of the LUCE Update would occur in primarily urban settings where land is already disturbed and; therefore, would not be anticipated to require blasting, which is typically used to remove unwanted rock or earth. However, it is possible that pile driving could occur during building construction under the LUCE Update.
Table 4.11-10  Representative Ground Vibration and Ground Noise Levels for Construction Equipment

<table>
<thead>
<tr>
<th>Equipment</th>
<th>PPV at 25 feet (in/sec)</th>
<th>Approximate Lv (VdB) at 25 feet</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pile Driver (impact) upper range</td>
<td>1.518</td>
<td>112</td>
</tr>
<tr>
<td>typical</td>
<td>0.644</td>
<td>104</td>
</tr>
<tr>
<td>Pile Driver (sonic) upper range</td>
<td>0.734</td>
<td>105</td>
</tr>
<tr>
<td>typical</td>
<td>0.170</td>
<td>93</td>
</tr>
<tr>
<td>Blasting</td>
<td>1.13</td>
<td>109</td>
</tr>
<tr>
<td>Large Dozer</td>
<td>0.089</td>
<td>87</td>
</tr>
<tr>
<td>Caisson Drilling</td>
<td>0.089</td>
<td>87</td>
</tr>
<tr>
<td>Loaded Trucks</td>
<td>0.076</td>
<td>86</td>
</tr>
<tr>
<td>Rock Breaker</td>
<td>0.059</td>
<td>83</td>
</tr>
<tr>
<td>Jackhammer</td>
<td>0.035</td>
<td>79</td>
</tr>
<tr>
<td>Small Dozer</td>
<td>0.003</td>
<td>58</td>
</tr>
</tbody>
</table>

**Source:** FTA 2006:p.12-6,12-8

PPV = peak particle velocity; \( L_v = \) the root mean square velocity expressed in vibration decibels (VdB), assuming a crest factor of 4

(b) Long-term Ground Vibration Exposure. The LUCE Update could facilitate the construction of sensitive land uses within portions of the Planning Area where known vibration sources exist, primarily in areas located along the existing active railroad corridors (a primary ground vibration source within the city). With regards to vibration impacts on new development near railroads, human disturbance is the primary concern. Vibration levels from trains passing would not result in structural damage to new development. Therefore, this analysis focuses on the effects of ground vibration on human disturbance from trains within the city.

The FTA Transit Noise and Vibration Impact Assessment Guidelines provides recommended vibration levels for various land use types based on the frequency of exposure from vibration events (i.e., number of trains passing by a sensitive land use). In some portions of the city, future planned development could be exposed to frequent vibration events (i.e., more than 16 trains per day), occurring adjacent to rail lines. Based on this frequency of train passing events (less than 30 trains per day), the FTA recommended level for which human disturbance would occur is 80 VdB (for residences and buildings were people typical sleep).

Based on the Generalized Ground Surface Vibration curves in the FTA guidance, proposed development within 80 feet of an existing railroad centerline could exceed the recommended threshold for human disturbance of 80 VdB for sensitive receptors that are exposed to an infrequent amount of vibration events.

**Applicable LUCE Update Policies**

There are no updates that refer specifically to vibration exposure.

**Applicable Existing City Policies**

The existing General Plan Noise Element establishes standards for siting of new land uses; however, it contains no policies or programs that address the specifically vibration exposure.

However, the City’s existing Noise Control Ordinance in Chapter 9.12 of the Municipal Code contains the following:

7. **Vibration.**

Operating or permitting the operation of any device that creates a vibration which is above the vibration perception threshold of an individual at or beyond the property boundary of the source if on private property or at one hundred fifty feet (forty-six meters) from the source if on a public space or public right-of-way.
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, not significant. No additional mitigation is required.

Mitigation Measures
None required.

4.3.3. Cumulative Impacts
Cumulative buildout of the proposed LUCE Update includes buildout of areas within existing city boundaries, as well as buildout of the identified expansion areas. Overall, development under the LUCE Update would increase development intensity within the city limits, as well as undeveloped areas to a more built environment, thereby resulting in the generation of noise impacts as experienced by sensitive receptors.

By its nature, the LUCE Update considers cumulative development within the city and potential expansion areas. Thus, cumulative impacts are generally equivalent to project-specific impacts. The combination of these impacts reflects the cumulative impacts of the LUCE Update. As noted above, the existing General Plan and the proposed LUCE Update protects sensitive receptors from noise impacts through policies and plan review. Adherence to these requirements would reduce any long term impacts from buildout, as well as buildout of Specific Plan and Special Planning Areas identified in the LUCE Update to a less-than-significant level. With the implementation of feasible construction noise reduction measures and exemptions, short term construction activities could still exceed applicable standards especially if activities are near existing receptors and/or occur during the nighttime. Thus, cumulative short-term construction noise levels remain Class I, significant and unavoidable.
This section describes the existing and projected population and housing characteristics of the City and County of San Luis Obispo, and the potential effects the proposed LUCE Update may have on future population and housing conditions within the City of San Luis Obispo.

4.12.1. Setting

Population and housing characteristics for the City and County of San Luis Obispo are described in detail in San Luis Obispo General Plan Update Background Report Section 2.1, Demographics. Please refer to the Background Report, which is hereby incorporated by reference, for additional details related to existing population and dwelling unit conditions in the City and County.

a. Population

Current estimates show that as of January 2013 the City of San Luis Obispo has a population of 45,541, and San Luis Obispo County has a population of 272,177 (CA DOF, 2013). The City’s population is approximately 17 percent of the total county-wide population. Table 4.12-1 shows recent population growth characteristics for the City and County, and indicates that the City’s population growth during the 2000-2010 decade was less than half the rate it was during the 1990s.

<table>
<thead>
<tr>
<th>Table 4.12-1</th>
<th>Population in San Luis Obispo City and County, 1990-2010</th>
</tr>
</thead>
<tbody>
<tr>
<td>Population</td>
<td>1990</td>
</tr>
<tr>
<td>City of San Luis Obispo</td>
<td>41,958</td>
</tr>
<tr>
<td>San Luis Obispo County</td>
<td>217,162</td>
</tr>
</tbody>
</table>

*Source: General Plan Background Report, 2014*

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 4,613 people between 2010 and 2035 (Table 4.12-2).

<table>
<thead>
<tr>
<th>Table 4.12-2</th>
<th>Existing and Projected Population, City of San Luis Obispo</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>2010</td>
</tr>
<tr>
<td>Low</td>
<td>43,937</td>
</tr>
<tr>
<td>Mid</td>
<td>43,937</td>
</tr>
<tr>
<td>High</td>
<td>43,937</td>
</tr>
</tbody>
</table>

*Source: General Plan Background Report, 2014*

Over the past 30 years, the population of the City has grown at an average rate of about one percent per year, with periods of faster or slower growth reflecting national and statewide economic cycles. For example, in the late 1980s and early 1990s, the City grew at an annual average rate of two percent. This was followed by a much slower rate of growth in the 1990s. Between 1990 and 1999, the City grew at annual average of only 0.3 percent, well below the General Plan’s
one percent growth target prescribed by Land Use Element’ Residential Growth Rate policy. Since April 2000, the City has grown a total of one percent, with the annual rate varying from a negative 0.3 percent to a positive 0.5 percent (City of San Luis Obispo, 2010).

b. Housing

The California DOF reports that at the beginning of 2013 the City had 20,697 housing units. About 46 percent are single-family detached houses, and 40 percent are multi-family housing. The remaining units are mobile homes and attached single family units. Over 60 percent of the City’s households are non-family households, which is defined by the U.S. Census Bureau as a “situation where a person is living in a household with non-relatives or by themselves.” In comparison, 37 percent of the County’s households are categorized as non-family households. The presence of college students likely contributes to the high percentage of non-family households, as well as to the fact that 60.7 percent of households in the City are renters.

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 2,651 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>Low</td>
<td>20,553</td>
<td>21,523</td>
<td>22,982</td>
<td>2,429</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>21,528</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)

The City’s Housing Element was adopted in January 2010 and includes the City’s Regional Housing Need Allocation (RHNA) for the period January 2010 through December 2014. The RHNA was determined by SLOCOG in 2008, in accordance with state law, and shows a projected need of 488 single-family units and 1,101 multi-family units, for a total of 1,589 dwelling units. As of 2010, the City had fulfilled 911 units against this RHNA, which under the state regulations may include units approved or constructed since January 1, 2007. Since 2010, the City has completed approximately 190 units, leaving about 488 units to be completed between 2012 and 2014.

c. Regulatory Setting

State Department of Housing and Community Development (HCD): HCD administers the state laws related to General Plan Housing Elements and RHNA. The City’s Housing Element was certified by the State in 2010 and is currently under revision. The 2014 allocation of 1,144 units for the City’s Housing Element update reflects the downturn in the economy over the previous five year timeframe. Decisions associated with the LUCE Update need to be made with consideration of the current RHNA assignment as well as the upcoming allocations and the increasing State-wide policy direction to accommodate residential growth where services are available. SLOCOG develops the regional projections that determine the RHNA for the region in collaboration with HCD. SLOCOG then works with staff from the county and the cities to determine the formula by which to divide and assign a portion of the regional allocation to each jurisdiction. The city’s current housing needs targets apply through 2014, and show the City’s zoning can accommodate the assigned 1,589 units. The 2014 RHNA for the region is 4,090, of which 1,144 is the City of San Luis Obispo’s responsibility.
4.12.2 Impact Analysis

a. Methodology and Significance Thresholds.

The analysis of population and housing impacts is based upon a review of conditions that could exist after buildout of the LUCE Update and a comparison of buildout conditions to both existing conditions and anticipated future conditions described by adopted long-range housing and population forecasts. Impacts relating to population and housing are considered significant if implementation of the LUCE Update would:

- Induce substantial population growth either directly or indirectly;
- Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere;
- Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.

b. Project-Specific Impacts

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.

An existing Land Use Element policy and proposed Land Use Element policy 1.10.2 (Residential Growth Rate) indicates that the City shall manage its housing supply so that it does not exceed a growth rate of one percent per year, on average, excluding dwellings affordable to residents with extremely low, very low or low incomes as defined by the State Department of Housing and Community Development for the City and County of San Luis Obispo and reflected in the City’s Housing Element.

1.10.2 Residential Growth Rate. The City shall manage the growth of the City’s housing supply so that it does not exceed no faster than one percent per year, on average, based on thresholds established by Land Use Element Table 44, excluding dwellings affordable to residents with extremely low, very low or low incomes as defined by the Housing Element. This rate of growth may continue so long as the City’s basic service capacity is assured. Table 4-4 shows the approximate number of dwellings and residents which would result from the one percent maximum average annual growth rate over the planning period. Approved specific plan areas may develop in accordance with the phasing schedule adopted by each specific plan provided thresholds established by Table 4-4 are not exceeded. The City Council shall review the rate of growth on an annual basis in conjunction with the General Plan annual report to ensure consistency with the City’s gradual assimilation policy.

The housing supply requirements specified by Policy 1.10.2 (Land Use Element Table 4) are depicted on EIR Table 4.12-4.

Table 4.12-4 Housing Supply Thresholds – One Percent Per Year Growth

<table>
<thead>
<tr>
<th>Year</th>
<th>Approximate Maximum Number of Dwellings*</th>
</tr>
</thead>
<tbody>
<tr>
<td>2013</td>
<td>20,697</td>
</tr>
<tr>
<td>2015</td>
<td>21,113</td>
</tr>
<tr>
<td>2020</td>
<td>22,190</td>
</tr>
<tr>
<td>2025</td>
<td>23,322</td>
</tr>
<tr>
<td>2030</td>
<td>24,512</td>
</tr>
<tr>
<td>2035</td>
<td>25,762</td>
</tr>
</tbody>
</table>

*Source: City of San Luis Obispo Land Use Element
It is estimated that at the start of 2013 there were 20,697 dwelling units in the city. Based on a maximum annual residential unit growth rate of one percent per year, by the year 2035 (the buildout year for the proposed LUCE Update) the maximum number of residential units in the city would be 25,762.

EIR Project Description Table 2.4-3 (Total Future Development Capacity within the Planning Subarea) includes an estimate of the number of new dwelling units that could be developed under the proposed Land Use Element. The table indicates that by 2035, buildout of the proposed specific plan areas (San Luis Ranch, Madonna on LOVR, and Avila Ranch) and proposed special planning areas (Foothill at Santa Rosa area, Caltrans site, General Hospital site, Broad Street area, Pacific Beach site, LOVR Creekside area, and the Broad Street at Tank Farm Road site) could result in the development of 2,316 additional residential units in the city. Table 2.4-3 also indicates that buildout of existing specific plans, planned and approved projects, and other vacant land could result in the development of approximately 2,588 additional dwelling units. In total, buildout of the proposed Land Use Element could result in approximately 4,904 additional residential units in the city. When added to the 2013 housing supply of 20,697 units, approximately 25,601 dwelling units could be located in the city upon buildout of the proposed Land Use Element.

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). Therefore, the Land Use Element Update would not exceed the adopted and proposed housing growth thresholds of Policy 1.10.2, which would not induce substantial population growth either directly or indirectly. Housing and population impacts of the proposed Land Use Element Update would be less than significant.

The estimated dwelling unit buildout characteristics of the Land Use Element Update reflect reasonable assumptions regarding development potential based on land use designation requirements. The estimates do not, however, reflect anticipated market conditions or new housing unit demand that would support buildout of the proposed Land Use Element. Recent dwelling unit projections prepared by SLOCOG are based on recent trends and estimated future demand for additional housing units. As shown on Table 4.12-3, SLOCOG estimates that by 2035, there will be 23,204 housing units (an increase of 2,507 units over 2013 conditions) in the City of San Luis Obispo. This estimate of the future number of housing units in the city is substantially below the one percent residential unit growth threshold specified by Land Use Element policy 1.10.2.

Proposed Land Use Element Development Special Planning Areas

In addition to the proposed specific and area plans described above, the proposed Land Use Element Update identifies six potential future development sites that could provide approximately 412 new dwelling units. These sites include the Foothill at Santa Rosa area (80 units); Caltrans site (53 units); General Hospital site (41 units); Pacific Beach site (38 units); LOVR Creekside area (159 units); and the Broad Street at Tank Farm Road site (41 units). In total, the proposed special planning areas could result in the development of 412 dwelling units. As indicated by the analysis provided above, buildout of the proposed special planning areas would not result in or substantially contribute to a significant housing or related population impact because buildout of the residential units proposed Land Use Element would be consistent with the residential unit growth specified by Land Use Element Policy 1.10.2. Therefore, the proposed special planning areas would not induce substantial population growth either directly or indirectly and would result in less than significant housing and population impacts.

Proposed Circulation Element Street Network Changes

The Circulation Element Update identifies seventeen proposed street network and other circulation system changes. The proposed changes would generally consist of bicycle- and pedestrian-related improvements; transit system additions; street realignments, extensions and connections; freeway on- and off-ramp modifications; and traffic flow modifications. These types of circulation system modifications would not result in or contribute to a significant population or housing impact because they would not substantially increase or decrease the population of the city or the number of dwelling units located in the city.
Proposed Land Use Element Specific Plan Areas

Much of the potential residential unit growth identified by the Land Use Element Update would occur on areas included in proposed specific plans and a proposed area plan. As indicated on Project Description Table 2.4-3, the San Luis Ranch Specific Plan would have the potential to include approximately 500 residential units; the Madonna on LOVR project could include approximately 115 units; and the Avila Ranch project could include approximately 700 units, for a total of approximately 1,315 residential units. Future development proposed by the South Broad Street Area Plan would have the potential to provide approximately 589 additional dwelling units. In total, the proposed specific plans and area plan could result in the development of 1,904 new dwelling units. As indicated by the analysis provided above, buildout of the proposed specific plans and area plan would not result in or substantially contribute to a significant housing impact, or a related population impact, because buildout of the proposed LUCE Update would be consistent with the residential unit growth requirements specified by Land Use Element Policy 1.10.2. Therefore, the proposed specific plans and area plan would not induce substantial housing or population growth either directly or indirectly and would result in less than significant housing and population impacts.

Mitigation Measures

The proposed LUCE Update would result in less than significant population and housing impacts and no mitigation measures are required.

Significance After Mitigation

The LUCE Update would not induce substantial population growth either directly or indirectly, and potential population and housing impacts would be less than significant.

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.

Proposed Land Use Element Development Special Planning Areas

The proposed Land Use Element Update identifies eight potential special planning areas that would provide a mix of residential units and non-residential uses. As indicated on Project Description Table 2.4-3, the proposed special planning areas include: the Foothill at Santa Rosa are, Caltrans site, General Hospital site, Sunset Drive-in site, Pacific Beach site, Calle Joaquin Auto Sales area, LOVR Creekside area, and the Broad Street at Tank Farm Road site. New development in the special planning areas could result in the loss of a limited number of dwelling units as future project sites are redeveloped to a more efficient mixed use or residential project, however, any loss of existing units that may occur as a result of future infill development is not expected to be significant, and in total, the proposed special planning areas could result in the development of 412 additional dwelling units in the city.

Proposed Circulation Element Street Network Changes

The proposed Circulation Element Update identifies seventeen proposed street network and other circulation system changes. The proposed circulation system modifications would not result in a significant loss of existing residential units or the displacement of residents.

Proposed Land Use Element Specific Plan Areas

The Land Use Element Update proposes to establish three new specific plan areas (San Luis Ranch, Madonna on LOVR, and Avila Ranch), which would have the potential to result in the development of approximately 1,315 residential units. The proposed specific plan sites are mostly vacant and would not result in significant displacements of residents or the loss of existing dwelling units. Even though several homes may be razed as a result of new development, the addition of homes at all market levels will offset the loss of the few homes that exist. The Land Use Element Update would also focus new development onto infill sites located throughout the city, including the proposed South Broad Street area, which would provide approximately 589 additional dwelling units. New development in the South Broad Street area could result in the loss of a limited number of dwelling units as future project sites are redeveloped to a more efficient mixed use or
residential project, however, any loss of existing units that may occur as a result of future infill development is not expected to be significant. Overall, implementation of the Land Use Element Update could result in the development of 1,904 additional residential units in the proposed specific plan and area plan areas.

**Mitigation Measures**

The LUCE Update would result in less than significant housing-related impacts and no mitigation measures are required.

**Significance After Mitigation**

The LUCE Update would result in less than significant housing-related impacts in the City of San Luis Obispo.

### 4.12.3. Cumulative Impacts

A comparison of existing (2010) and projected 2035 population and dwelling unit characteristics for the City and County of San Luis Obispo is provided on Table 4.12-5. As shown, projected population and dwelling unit growth in the City is projected to be commensurate with anticipated growth throughout San Luis Obispo County. A corresponding growth rate between the City and County indicates that the LUCE Update would not substantially alter the balance of population or dwelling units in the County. In addition, as a General Plan Update, cumulative impacts are treated somewhat differently than would be the case for a project-specific development. By its nature, the LUCE Update considers cumulative development within the city and potential expansion areas. Thus, cumulative impacts are generally equivalent to project-specific impacts. Therefore, the LUCE Update would have less than significant cumulative impacts related to providing new residential units and associated population growth.

<table>
<thead>
<tr>
<th></th>
<th>Population</th>
<th>2010</th>
<th>2035</th>
<th>2010</th>
<th>2035</th>
</tr>
</thead>
<tbody>
<tr>
<td>County of San Luis Obispo</td>
<td>252,631</td>
<td>304,736</td>
<td>117,315</td>
<td>141,888</td>
<td></td>
</tr>
<tr>
<td>City of San Luis Obispo</td>
<td>43,937</td>
<td>48,550</td>
<td>20,553</td>
<td>23,204</td>
<td></td>
</tr>
<tr>
<td>City Share of County-Wide Total</td>
<td>17%</td>
<td>16%</td>
<td>18%</td>
<td>16%</td>
<td></td>
</tr>
</tbody>
</table>

*Sources: SLOCOG, 2011*
This section describes existing public services provided in the City of San Luis Obispo, including fire and police protection, and public schools. This section also describes how the proposed LUCE Update would impact the provision of these services.

### 4.13.1. Setting

Existing fire, police, and public school service characteristics in the City of San Luis Obispo are described in detail in San Luis Obispo General Plan Update Background Report Sections 5.3, Public Services. Please refer to the Background Report, which is hereby incorporated by reference, for additional details related the provision of public services in the city.

#### a. Fire Protection Services

The San Luis Obispo Fire Department (SLOFD) provides fire and emergency services to the City of San Luis Obispo. The Fire Department is organized into five divisions: Emergency Operations, Fire Prevention and Life Safety, Training and Equipment, Administrative, and Support Services. In addition to providing fire and emergency services to the city, SLOFD maintains an Emergency Services Contract with Cal Poly. Under the current contract, SLOFD provides fire and emergency services to the university in return for a set annual fee.

The Insurance Services Office (ISO) provides fire department ratings for the insurance industry. The ratings are based on a scale from Class 1 to Class 10 where Class 1 is the best score. ISO ratings are derived from a community’s fire-suppression delivery system, including fire dispatch, fire department, and water supply. San Luis Obispo currently (2012) has a Class 2 ISO rating.

**Facilities:** SLOFD operates out of four fire stations located throughout the city. The locations of each fire station are depicted on Figure 4.13-1, and each station is briefly described below.

**Station One:** Constructed in 1996, Fire Station One is the newest firehouse in the city. The station is located at 2160 Santa Barbara Avenue and houses administrative offices, the Fire Prevention Bureau, and the maintenance shop. The station is staffed with the Battalion Chief and a four-person paramedic team.

**Station Two:** Constructed in 1954, Fire Station Two is the oldest firehouse in the city. The station is located at 126 North Chorro and is staffed with a three-person paramedic engine company.

**Station Three:** Fire Station Three was constructed in 1960 and is located at 1280 Laurel Lane. The station is staffed with a three-person paramedic engine company.

**Station Four:** Fire Station Four was constructed in 1978 and is located at 1395 Madonna Road. The station is staffed with a three-person paramedic engine company.
Staffing: A total of 51.8 full time employees worked at the San Luis Obispo City Fire Department as of July 2012. The Department is led by the Fire Chief and three Battalion Chiefs. Other fire personnel include 13 Captains, 15 Engineers, and 12 Firefighters. SLOFD also employs a Fire Marshal, a Hazardous Materials Coordinator, 1.8 Fire Inspectors, one fire vehicle mechanic, and three administrative staff.

Firefighters work 24-hour shifts. There is one Battalion Chief on command and three personnel, including a paramedic, assigned to each station engine and truck, except for Station One, which has four personnel. Based on these staffing assignments, each shift has a minimum of 14 personnel on duty at any given time.

SLOFD meets National Fire Protection Association (NFPA) guideline 1710, which calls for 14 firefighters on duty to fight the average structure fire; however, Station One is the only station with a four person team as recommended by NFPA guideline 1710 and OSHA. For a serious building fire, the City must send out 100 percent of the on-duty force to meet the Emergency Operations Plan goal of sending three engines and one ladder truck. The County Fire Department assists the City when a fifth unit is needed.

Response Times: Program 9.3A of the Safety Element of the City’s General Plan establishes a fire department response time standard of four minutes; however, the standard does not indicate how the beginning and end of the response time is to be measured and this should be clarified. The Fire Department Master Plan (2009) evaluates response times based on NFPA and ISO standards. The NFPA recommends a four-minute travel time for the first responding engine. The ISO recommends a 1.5 mile distance response area for the first responding engine. Generally, a response time of four minutes or less can be achieved if the call for service for location is less than 1.5 miles from the fire station.

A map depicting the Fire Department’s four-minute response area is depicted on Figure 4.13-1. As shown, most of the city is within a four minute response (travel) time from an existing city fire station. The southern portion of the city is the largest area outside of the Department’s four-minute response time. A smaller area outside the four-minute response area is located in the northern portion of the city.

Planning Programs: Measures related to fire protection services in the city are contained in the City’s Safety Element of the General Plan (2012) and the Fire Department Master Plan (2009). The goals of the Safety Element are to: minimize injury and loss of life; minimize damage to public and private property; and minimize social and economic disruptions resulting from injury, death, and property damage. The Safety Element addresses a variety of natural and human-caused hazards, including wildfire and methods to reduce the effects of wildfires on the City. The Safety Element also provides policy guidance indicating fire protection services should be adequate to serve new development. The Fire Department Master Plan provides an evaluation of the City’s Fire Department, including a review of fire station and crew deployment; fire station and staffing infrastructure; fire prevention systems; and possible costs related to recommended changes to the Fire Department.

b. Police Protection Services

The San Luis Obispo Police Department (SLOPD) provides police protection services within the city limits. SLOPD is responsible for responding to calls for service, investigating crimes and arresting offenders, enforcing traffic and other laws, and promoting community safety through crime prevention and school-safety patrols. The Police Department consists of two bureaus, Administration and Operations, each of which has four divisions. The Police Department operates out of one main facility located at 1042 Walnut Street and a small additional office at 1016 Walnut Street. In July 2010, a new Emergency Communications Center opened at Fire Station One. The Emergency Communications Center provides dispatch for the Police Department and Fire Department. Program 9.3C of the Safety Element establishes a 30% available time objective for patrol response. “Available time” is the fraction of total time that a patrol unit is not previously assigned and is intended for use to conduct proactive enforcement, community policing or to assist with neighborhood wellness initiatives.
The San Luis Obispo County Sheriff’s Department provides law enforcement services to areas outside the city but within the LUCE Planning Subarea. The Cal Poly Police Department provides police protection on campus. The California Highway Patrol (CHP) also provides law enforcement services within the LUCE Planning Subarea, primarily along state highways.

**Staffing:** The San Luis Obispo Police Department was staffed with 82.5 full- and part-time employees as of July 2012, including 57 sworn police officers. SLOPD is led by the Chief of Police and two bureau Captains. The other sworn police officers include three lieutenants, eight sergeants, and 43 officers.

SLOPD’s current (2012) staffing ratio is 1.27 officers per 1,000 residents. Neither the General Plan nor the SLOPD establishes staffing ratio goals for the Department; however, the Federal Bureau of Investigation and the California Commission on Peace Officer Standards and Training report average police department staffing ratios across the nation. Table 4.13-1 lists the staffing ratios for other city police departments in San Luis Obispo County, and the state average staffing ratio for cities with a population of 25,000 to 49,999. According to the California Commission on Peace Officer Standards and Training, SLOPD’s staffing ratio is lower than other police departments in the region, except Atascadero and Paso Robles, and is slightly below the state average for comparable communities.

**Table 4.13-1 Police Department 2012 Staffing Ratios County of San Luis Obispo**

<table>
<thead>
<tr>
<th>Jurisdiction</th>
<th>Ratio of Officers per 1,000 People</th>
</tr>
</thead>
<tbody>
<tr>
<td>San Luis Obispo</td>
<td>1.27</td>
</tr>
<tr>
<td>Arroyo Grande</td>
<td>1.39</td>
</tr>
<tr>
<td>Atascadero</td>
<td>0.98</td>
</tr>
<tr>
<td>Grover Beach</td>
<td>1.29</td>
</tr>
<tr>
<td>Morro Bay</td>
<td>1.75</td>
</tr>
<tr>
<td>Paso Robles</td>
<td>1.12</td>
</tr>
<tr>
<td>Pismo Beach</td>
<td>3.12</td>
</tr>
<tr>
<td>State of California*</td>
<td>1.38</td>
</tr>
</tbody>
</table>


c. **Public Schools**

The San Luis Coastal Unified School District (SLCUSD) serves an area between the coast and the Los Padres National Forest, and from Morro Bay to the north and Arroyo Grande to the south. In total, the District operates ten elementary schools, two middle schools, two high schools, one continuation high school, and an adult education facility. In addition to the K-12 educational program, the SLCUSD offers a variety of additional educational programs, including: cooperative preschool, preschool early education, and parent participation. Within the San Luis Obispo LUCE Planning Subarea, the District operates six elementary schools, one middle school, one high school, and one continuation high school. Total District enrollment has increased by three percent over the past three years following a ten-year steady decline in enrollment. Table 4.13-2 lists the public schools in the LUCE Planning Subarea, their addresses, 2014 enrollment, and school capacity. The locations of the schools in the LUCE Planning Subarea are shown in Figure 4.13-2.
Figure 4.13-2
SLCUSD Schools

Legend

- Planning Area
- Schools

Source: City of San Luis Obispo, 2012.

4.0 Environmental Impact Analysis

June 2014
Table 4.13-2  LUCE Planning Subarea Public Schools

<table>
<thead>
<tr>
<th>School</th>
<th>Grades</th>
<th>Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bishop’s Peak Elementary</td>
<td>K-6</td>
<td>451 Jaycee Drive</td>
</tr>
<tr>
<td>Hawthorne Elementary</td>
<td>K-6</td>
<td>2125 Story Street</td>
</tr>
<tr>
<td>Los Ranchos Elementary¹</td>
<td>Pre K-6</td>
<td>5785 Los Ranchos Road</td>
</tr>
<tr>
<td>Pacheco Elementary</td>
<td>K-6</td>
<td>261 Cuesta Drive</td>
</tr>
<tr>
<td>Sinsheimer Elementary*</td>
<td>K-6</td>
<td>2755 Augusta</td>
</tr>
<tr>
<td>C.L. Smith Elementary</td>
<td>Pre K-6</td>
<td>1375 Balboa</td>
</tr>
<tr>
<td>Teach Elementary²</td>
<td></td>
<td>4-6</td>
</tr>
<tr>
<td>Laguna Middle School</td>
<td>7-8</td>
<td>11050 Los Osos Valley Road</td>
</tr>
<tr>
<td>Pacific Beach High School</td>
<td>10-12</td>
<td>11950 Los Osos Valley Road</td>
</tr>
<tr>
<td>San Luis Obispo High School</td>
<td>9-12</td>
<td>1499 San Luis Drive</td>
</tr>
</tbody>
</table>

¹ Los Ranchos Elementary School is located outside the Land Use and Circulation Planning Subarea but serves San Luis Obispo.
² Teach Elementary School shares a campus site with Bishop’s Peak Elementary. It is an open enrollment school accepting highly motivated children in grades 4-6 with advanced skills from throughout the San Luis Coastal Unified School District.
Source: SLCUSD, 2014

There are six private schools located within the LUCE SOI Planning Subarea that provide preschool, primary, secondary, and high school educational services to residents based on individually set criteria (e.g., academic performance, religious affiliation). California Polytechnic State University San Luis Obispo and Cuesta College provide college education services.

4.13.2 Impact Analysis

a. Methodology and Significance Thresholds.

The proposed LUCE Update would result in potentially significant impacts if it would result in the following:

- Substantial adverse physical impacts associated with provision of new or physically altered governmental facilities, and
- The need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives.

b. Project Impacts

Impact PS-1

Buildout of the proposed Land Use Element would increase the demand for fire protection services by increasing population and the number of structures in the city. This is a Class II, potentially significant but mitigable impact.

New residential and non-residential development facilitated by the proposed Land Use Element Update would place additional service demands on the SLOFD. 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.

Proposed LUCE Update Development Special Planning Areas and Street Network Changes

The proposed Land Use Element Update identifies eight potential special planning areas that would provide a mix of residential units and non-residential uses. The proposed special planning areas include: the Foothill at Santa Rosa area, Caltrans site, General Hospital site, Sunset Drive-in site, Pacific Beach site, Calle Joaquin Auto Sales area, LOVR Creekside area, and the Broad Street at Tank Farm Road site.
Foothill @ Santa Rosa: This area is located in the northern portion of the city, less than 0.5 miles east of Fire Station No. 2. As depicted on Figure 4.13-1, the Foothill at Santa Rosa area is within the Fire Department’s four-minute travel time.

Caltrans Site: This area is located in the central portion of the city, approximately one mile west of Fire Station No.1. As depicted on Figure 4.13-1, the Caltrans site is within the Fire Department’s four-minute travel time.

General Hospital Site: This area is located in the eastern portion of the city, approximately one mile northeast of Fire Station No.1, and one mile north of Fire Station No. 3. As depicted on Figure 4.13-1, the General Hospital site is within the Fire Department’s four-minute travel time.

Sunset Drive-in Site: This area is located in the southern portion of the city, approximately 1.5 miles southwest of Fire Station No. 1, and 1.5 miles east of Fire Station No. 4. As depicted on Figure 4.13-1, the southern portion of the Sunset Drive-in site is adjacent to but beyond the Fire Department’s four-minute travel time.

Pacific Beach Site: This area is located in the western portion of the city, less than 0.5 mile from Fire Station No. 4. As depicted on Figure 4.13-1, the Pacific Beach site is within the Fire Department’s four-minute travel time.

Calle Joaquin Auto Sales Area: This area is located in the western portion of the city, approximately 0.5 mile southeast of Fire Station No. 4. As depicted on Figure 4.13-1, the Calle Joaquin Auto Sates area is within the Fire Department’s four-minute travel time.

LOVR Creekside Area: This area is located in the southern portion of the city, approximately one mile southeast of Fire Station No.4. As depicted on Figure 4.13-1, the LOVR Creekside area is within the Fire Department’s four-minute travel time to the property boundary at LOVR. Internal circulation has the potential to be outside of the response time.

Broad Street at Tank Farm Road site: This area is located in the southern portion of the city, approximately 0.5 mile north of CalFire Station No. 21. As depicted on Figure 4.13-1, the Broad Street at Tank Farm Road site is located with a four-minute travel time area.

Development that may occur at the Sunset Drive-in and LOVR Creekside area would be located adjacent to but beyond the currently designated Fire Department four-minute travel time. It is unlikely that development in these areas would require the development of a new fire station or other facilities that would have the potential to result in significant environmental impacts. The provision of adequate fire suppressions services to these areas could be achieved through the implementation of the general plan policies and mitigation identified below.

Proposed Circulation Element Street Network Changes
The Circulation Element Update identifies seventeen proposed street network and other circulation system changes. The proposed changes would generally consist of bicycle- and pedestrian-related improvements; transit system additions; street realignments, extensions and connections; freeway on- and off-ramp modifications; and traffic flow modifications. These types of circulation system modifications would not result in or contribute to a significant increase in the demand for fire suppression services and in some instances could improve response time by providing additional connections.

Proposed Land Use Element Specific and Area Plans

San Luis Ranch Specific Plan
This 132-acre specific plan site is located in the southwestern portion of the city, and the development of this area could result in the construction of approximately 500 dwelling units and 470,000 square feet of non-residential uses. The San Luis Ranch Specific Plan area is located approximately 0.5 mile east of City Fire Station No. 4, and is within the four-minute response area of the fire station.
- **Madonna on Los Osos Valley Road Specific Plan Area**
  This site consists of approximately 111 acres and is located directly west of the intersection of Los Osos Valley Road and Calle Joaquin. Implementation of the Specific Plan could result in the development of approximately 115 residential units and 336,170 square feet of non-residential uses. This specific plan site is located approximately 0.5 mile south of City Fire Station No. 4, and is within the four-minute response area of the fire station.

- **Avila Ranch Specific Plan Area**
  This site encompasses approximately 150 acres and is located near the southern edge of the City. Implementation of the Avila Ranch Specific Plan could result in the development of approximately 700 residential units and 25,000 square feet of non-residential uses. This specific plan site is located approximately 1.5 miles west of CalFire Fire Station No. 21 which provides mutual aid response, but is located beyond the City Fire Department’s four minute travel time area. The lack of four-minute response coverage in the southern portion of the city was identified by the Fire Department Master Plan, which recommended adding a fifth fire station and crew to improve response time in southern areas of the city. Potential fire safety impacts that may result from new development located beyond the Fire Department’s four-minute response 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 should be approved only when adequate fire suppression services and facilities are available. The proposed Specific Plan performance standards include the requirement to address fire protection and impacts to emergency response times.

  If a new fire station is required, environmental impacts that may result could include short-term effects such as construction-related increases in noise and air emissions, water quality impacts from increased erosion or an accidental release of construction materials, or impacts to sensitive biologic or cultural resources if such resources are present within or adjacent to project site. Short-term, construction-related impacts such as these are generally reduced to a less than significant level with the implementation of site design measures and compliance with applicable regulations. Fire stations are commonly located within or adjacent to residential areas, therefore, it is reasonably anticipated that potential long-term compatibility impacts of a new fire station (i.e., noise, traffic, aesthetics, etc.) would not be significant. Adverse physical impacts associated with the provision of a new or altered fire station needed to comply with travel time standards are unlikely as any new or reconstructed facility would be required to meet community design guidelines, and its location would need to meet the response time needs of the community.

- **South Broad Street Special Planning Area**
  The South Broad Street area is located in the central portion of the city. Implementation of the Area Plan could result in the development of approximately 589 residential units and 229,068 square feet of non-residential uses. New development in the South Broad Street area would be located approximately one mile north of City Fire Station No. 1 and would be within the four-minute response area of the fire station.

**Applicable LUCE Update Policies**

Proposed Land Use Element Policy 8.3.2.6 establishes performance standards related to the planning, design and development of the Avila Ranch Specific Plan, and item “K” of that policy recognizes the “fire protection and impacts to emergency response times” that would be associated with development on the Avila Ranch Specific Plan site. While this policy recognizes that fire protection services in the southern portion of the City must be addressed, the policy is not adequate to reduce potential fire protection impacts of the Avila Ranch Specific Plan to a less than significant level.

**Other Applicable City Policies**

In addition to planning requirements for the Avila Ranch Specific Plan, General Plan Safety Element Policy 3.0 addresses the provision of adequate fire protection services for new development and states:
Policy 3.0: Adequate Fire Services. 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.

As indicated by the Fire Department Master Plan, a fifth fire station in the southern portion of the city would be required if development such as the proposed Avila Ranch Specific Plan and other development envisioned in the Airport Area Specific Plan is to be consistent with the intent of Safety Element Policy 3.0. The implementation of this policy would also reduce potential fire protection impacts in the Sunset Drive-in and LOVR Creekside areas, which are located slightly beyond the Fire Department’s four-minute travel area.

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.

Impacts related to fire and wildland fire hazards, and the existing General Plan Safety Element policies and programs that address these impacts, are discussed in detail under Section 4.8, Hazards and Hazardous Materials.

Mitigation Measures.

The following mitigation measure is proposed to reduce potential fire suppression impacts of the proposed Land Use Element Update. (Note to reader: The following policy includes strikethrough and underline text to reflect the proposed changes to the General Plan.)

The following policy shall be added to the proposed Land Use Element Update prior to adoption:

PS-1 New Policy. Development should 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.

Significance After Mitigation.

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 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.

Impact PS-2

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.

New residential and non-residential development facilitated by the proposed Land Use Element Update would place additional service demands on the SLOPD. Increased service demands would have the potential to result in a significant environmental impact if new or physically altered law enforcement service facilities would be required.
Proposed Land Use Element Update

EIR Project Description Table 2.4-3 (Total Future Development Capacity within the Planning Subarea) indicates that buildout of the proposed Land Use Element could result in the development of approximately 4,904 new dwelling units in the city. When added to the City’s existing 20,697 dwelling units (DOF, 2013), a total of approximately 25,601 residential units would be located in the city under general plan buildout conditions. Using an average population of 2.29 persons per dwelling unit, the proposed Land Use Element would have the potential to support a city-wide population of approximately 58,626. The City currently has 57 sworn police officers. If no additional police officers were hired by the buildout year of 2035, the ratio of officers to 1,000 people in the city would drop from the existing ratio of 1.27 to a ratio of 1.03.

If additional officers were hired commensurate with future population growth facilitated by the proposed Land Use Element, a total of 74 officers, an increase of seventeen officers compared to existing conditions, would be required to retain the existing officer to population ratio of 1.27. Space to house police personnel and equipment is currently fully subscribed. With additional officers, there could be additional need for evidence and equipment storage, locker space, area to park police vehicles, and support staff (and their associated space needs) necessary to support additional officers. Should a substantial number of officers be hired in the future, reconfiguration, reconstruction or new construction of facilities may be needed to accommodate them. If a new or additional facility is constructed in a new location, changes to response time could result. Adverse physical impacts associated with the provision of new or altered facilities needed to maintain the existing ratio of officers to the population served are unlikely as any new or reconstructed facility would be required to meet community design guidelines, and its location would need to meet the response time needs of the community.

Proposed Circulation Element Update

The Circulation Element Update identifies seventeen proposed street network and other circulation system changes. The proposed changes would generally consist of bicycle- and pedestrian-related improvements; transit system additions; street realignments, extensions and connections; freeway on- and off-ramp modifications; and traffic flow modifications. These types of circulation system modifications would not result in or contribute to a significant increase in the demand for law enforcement services, however there may be potential impacts related to the increased physical area to patrol. This potential impact is addressed through maintaining the ratio of sworn police officers to community members.

Mitigation Measures.

The proposed LUCE Update would result in less than significant environmental impacts related to law enforcement services and no mitigation measures are required.

Significance After Mitigation.

The proposed LUCE Update would not result in substantial adverse physical impacts associated with the provision of new or altered facilities related to law enforcement services.

Impact PS-3

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.

Providing new residential units would increase the population of the City, which would result in additional school-age children attending the City’s public schools. New student generation rates for single- and multi-family residential units are depicted on Table 4.13-3.
Table 4.13-3  Student Generation Rates

<table>
<thead>
<tr>
<th>Grade Level</th>
<th>Single-Family Units (students per unit)</th>
<th>Multi-Family Units (students per unit)</th>
</tr>
</thead>
<tbody>
<tr>
<td>K-6</td>
<td>0.110</td>
<td>0.116</td>
</tr>
<tr>
<td>7-8</td>
<td>0.012</td>
<td>0.032</td>
</tr>
<tr>
<td>9-12</td>
<td>0.035</td>
<td>0.066</td>
</tr>
</tbody>
</table>

Source: San Luis Coastal Unified School District, 2014

EIR Project Description Table 2.4-3 (Total Future Development Capacity within the Planning Subarea) indicates that buildout of the proposed Land Use Element could result in the development of approximately 4,904 new dwelling units in the city, consisting of 2,420 single-family dwellings and 2,484 multi-family units. Projected new student generation that would result from buildout of the proposed Land Use Element is provided on Table 4.13-4.

Table 4.13-4 Proposed Land Use Element Buildout Student Generation

<table>
<thead>
<tr>
<th>Grade Level</th>
<th>Generation Rates</th>
<th>Proposed Units</th>
<th>Additional Students</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Single-Family Units (students per unit)</td>
<td>Multi-Family Units (students per unit)</td>
<td>Single-Family Units</td>
</tr>
<tr>
<td>K-6</td>
<td>0.110</td>
<td>0.116</td>
<td>2,420</td>
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<tr>
<td>7-8</td>
<td>0.012</td>
<td>0.032</td>
<td>2,420</td>
</tr>
<tr>
<td>9-12</td>
<td>0.035</td>
<td>0.066</td>
<td>2,420</td>
</tr>
<tr>
<td>TOTAL</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
</tbody>
</table>

Source: San Luis Coastal Unified School District, 2014

Based on student generation rates provided by San Luis Coastal Unified School District, the Land Use Element Update would have the potential to generate approximately 911 additional students by the year 2035, which is anticipated to be the buildout year of the proposed Land Use Element. The additional students generated by buildout of the proposed Land Use Element could result in over-capacity conditions at certain schools located in the LUCE Planning Area. The additional students could result in the need for the expansion of existing schools and/or the installation of portable classrooms at existing school sites; however, it is unlikely that providing additional classrooms at existing school sites would result in significant environmental impacts. Should new school facilities be required, environmental impacts could include short-term effects such as construction-related increases in noise and air emissions, water quality impacts from increased erosion or an accidental release of construction materials, or impacts to sensitive biologic or cultural resources if such resources are present within or adjacent to project site. Short-term, construction-related impacts such as these are generally reduced to a less than significant level with the implementation of site design measures and compliance with applicable regulations. Schools are commonly located within or adjacent to residential areas, therefore, it is reasonably anticipated that potential long-term compatibility impacts (i.e., noise, traffic, aesthetics, etc.) would not be significant. Site-specific evaluations of any proposed new or expanded schools would be required, however, it is expected that, the proposed Land Use Element Update would not result in significant adverse physical impacts associated with the provision of new or altered school facilities needed to serve additional school-age children residing in the additional 4,904 residential units that could be developed under the proposed Land Use Element.

Proposed Land Use Element Development Special Planning Areas

The proposed Land Use Element Update identifies eight potential special planning areas that would provide a mix of residential units and non-residential uses. The proposed special planning areas include: the Foothill at Santa Rosa area, Caltrans site, General Hospital site, Sunset Drive-in site, Pacific Beach site, Calle Joaquin Auto Sales area, LOVR Creekside area, and the Broad Street at Tank Farm Road site. In total, the proposed special planning areas could result in the development of 412 new dwelling units, consisting of nine (9) single-family dwellings and 403 multi-family units. Potential student generation characteristics of the proposed special planning areas are described below and summarized on Table 4.13-5.
Foothill @ Santa Rosa. The Foothill at Santa Rosa site could result in the development of 80 multi-family units, which would have the potential to generate 17 school-age children.

Caltrans Site. The Caltrans site could result in the development of 53 multi-family units, which would have the potential to generate 11 school-age children.

General Hospital Site. The General Hospital site could result in the development of 41 dwelling units, consisting of nine (9) single-family dwellings and 32 multi-family units. The proposed residences would have the potential to generate eight (8) school-age children.

Sunset Drive-in Site. No residential units are proposed for this area.

Pacific Beach Site. The Pacific Beach site could result in the development of 38 multi-family units, which would have the potential to generate eight (8) school-age children.

Calle Joaquin Auto Sales Area. No residential units are proposed for this area.

LOVR Creekside Area. The LOVR Creekside area could result in the development of 159 multi-family units, which would have the potential to generate 34 school-age children.

Broad Street at Tank Farm Road site. This potential development site could result in the development of 41 multi-family units, which would have the potential to generate nine (9) school-age children.

### Table 4.13-5. Proposed Special Planning Area Student Generation

<table>
<thead>
<tr>
<th>Grade Level</th>
<th>Single-Family Units (students per unit)</th>
<th>Multi-Family Units (students per unit)</th>
<th>Proposed Units</th>
<th>Additional Students</th>
</tr>
</thead>
<tbody>
<tr>
<td>K-6</td>
<td>0.110</td>
<td>0.116</td>
<td>9</td>
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<tr>
<td>7-8</td>
<td>0.012</td>
<td>0.032</td>
<td>9</td>
<td>403</td>
</tr>
<tr>
<td>9-12</td>
<td>0.035</td>
<td>0.066</td>
<td>9</td>
<td>403</td>
</tr>
<tr>
<td>TOTAL</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
</tbody>
</table>

Source: San Luis Coastal Unified School District, 2014

In total, the proposed special planning areas would have the potential to generate approximately 88 school-age children, which could contribute to over-capacity conditions at certain schools. As indicated above, the additional students could result in the need for the expansion of existing schools and/or the installation of portable classrooms at existing school sites; however, it is unlikely that providing additional classrooms at existing school sites would result in significant environmental impacts. Therefore, the proposed specific and area plans would not result in significant adverse physical impacts associated with the provision of new or altered school facilities needed to serve additional school-age children.

### Proposed Circulation Element Street Network Changes

The Circulation Element Update identifies seventeen proposed street network and other circulation system changes. The proposed changes would generally consist of bicycle- and pedestrian-related improvements; transit system additions; street realignments, extensions and connections; freeway on- and off-ramp modifications; and traffic flow modifications. The proposed street network and circulation system changes would not result in the generation of school-age children.

### Proposed Land Use Element Specific and Area Plans

The proposed Land Use Element would result in the establishment of three new specific plan areas in the city: San Luis Ranch, Madonna on LOVR, and Avila Ranch. In total, the proposed specific plans would have the potential to provide approximately 1,315 residential units. As indicated on Project Description Table 2.4-3, approximately 725 of the proposed units would be single-family dwellings and approximately 590 would be multi-family units. In addition, future development proposed by the South Broad Street Area Plan would have the potential to result in the development approximately 589 additional multi-family dwelling units. In total, the proposed specific and area plans could result in the development of 1,904 new dwelling units, consisting of 725 single-family dwellings and 1,179 multi-family units.
Potential student generation characteristics of the proposed specific and area plans are described below and summarized on Table 4.13-6.

- **San Luis Ranch Specific Plan Area**
  The San Luis Ranch Specific Plan could result in the development of approximately 500 residences, consisting of 320 single-family dwellings and 180 multi-family units. It is estimated that the new residences located on the San Luis Ranch Specific Plan site would generate approximately 89 additional school-age children.

- **Madonna on Los Osos Valley Road Specific Plan Area**
  This Specific Plan could result in the development of approximately 115 multi-family units. It is estimated that the dwelling units located on the Madonna on Los Osos Valley Road Specific Plan site would generate approximately 25 additional school-age children.

- **Avila Ranch Specific Plan Area**
  The Avila Ranch Specific Plan could result in the development of approximately 700 residential units, consisting of 405 single-family dwellings and 295 multi-family units. It is estimated that the new residences located on specific plan site would generate approximately 127 additional school-age children.

- **South Broad Street Special Planning Area**
  Implementation of this Area Plan could result in the development of approximately 589 multi-family units. It is estimated that the new dwelling units located in the South Broad Street Area Plan would generate approximately 126 additional school age children.

<table>
<thead>
<tr>
<th>Grade Level</th>
<th>Generation Rates</th>
<th>Proposed Units</th>
<th>Additional Students</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Single-Family Units (students per unit)</td>
<td>Multi-Family Units (students per unit)</td>
<td>Single-Family Units</td>
</tr>
<tr>
<td>K-6</td>
<td>0.110</td>
<td>0.116</td>
<td>725</td>
</tr>
<tr>
<td>7-8</td>
<td>0.012</td>
<td>0.032</td>
<td>725</td>
</tr>
<tr>
<td>9-12</td>
<td>0.035</td>
<td>0.066</td>
<td>725</td>
</tr>
<tr>
<td>TOTAL</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
</tbody>
</table>

*Source: San Luis Coastal Unified School District, 2014*

In total, the proposed specific and area plans would have the potential to generate approximately 367 school-age children, which could contribute to over-capacity conditions at certain schools. As indicated above, the additional students could result in the need for the expansion of existing schools and/or the installation of portable classrooms at existing school sites; however, it is unlikely that providing additional classrooms at existing school sites would result in significant environmental impacts. Therefore, the proposed specific and area plans would not result in significant adverse physical impacts associated with the provision of new or altered school facilities needed to serve additional school-age children.

**Mitigation Measures**

Senate Bill 50 (Government Code Section 65970) implemented school impact fee reforms in 1998 by amending the laws governing developer fees and school mitigation. Pursuant to SB 50, future development projects would be required to pay school impact fees established to offset potential impacts on school facilities. Therefore, although the LUCE Update would result in additional students and could result in or contribute to over-capacity at individual schools, payment of the fees mandated under SB 50 is the mitigation measure prescribed by the statute, and payment of the fees is deemed full and complete mitigation. Therefore, no additional mitigation is required.
Significance After Mitigation

With the required payment of statutory fees, school impacts associated with buildout of the proposed Land Use Element Update would be less than significant.

4.13.3. Cumulative Impacts

The analysis of fire, police, and public school services provided above evaluates potential impacts resulting from buildout of the proposed Land Use Element Update. The impact analysis concluded that increased demands for police services resulting from additional population facilitated by buildout of the proposed LUCE Update would not require expanded law enforcement facilities that would have the potential to result in significant environmental impacts. The analysis also concluded that providing additional classrooms at existing school sites to accommodate students generated by buildout of the Land Use Element Update would be unlikely to result in significant environmental impacts. Therefore, the less than significant environmental impacts that could result from providing additional classrooms would not be cumulatively considerable, and buildout of the proposed Land Use Element Update would result in less than significant cumulative environmental impacts related to providing adequate police and school services under future buildout conditions.

The analysis also determined that development proposed by the LUCE Update in the southern portion of the city (primarily the Avila Ranch Specific Plan) would be located beyond the Fire Department’s four minute response time area. Other future development in the southern portion of the city, such as on the Airport Specific Plan area, would also be located beyond the existing four minute response area. To comply with Safety Element Policy 3.0 and proposed mitigation measures PS-1, which require that development be approved only when adequate fire suppression services and facilities are or will be available, a new fire station will be needed in the southern portion of the city. As described above, it is not anticipated that the development and operation of a new fire station would result in significant environmental impacts. Therefore, the less than significant environmental impacts that could result from new facilities required to provide adequate fire services in the southern portion of the city would not be cumulatively considerable and would result in less than significant cumulative impacts.
This section describes existing park and recreation facilities in San Luis Obispo, identifies proposed changes in the amount and location of park facilities proposed by the LUCE Update, and evaluates the impacts of these changes on the overall supply of parkland in the city.

4.14.1. Setting

Recreation facility characteristics in the City of San Luis Obispo are described in detail in San Luis Obispo General Plan Update Background Report Section 5.6, Parks and Recreation. Please refer to the Background Report, which is hereby incorporated by reference, for additional details related to parks and recreation facilities in the city.

a. Existing Recreation Facilities

In 2012 there were 26 parks in the city, consisting of eight (8) community parks, 10 neighborhood parks, and eight (8) mini parks. There are also six (6) joint use facilities, and several recreation centers and special facilities (e.g., Damon Garcia Sports Fields and the SLO Swim Center). There is currently approximately 151.65 acres of parkland in the city, of which 33.53 acres are neighborhood parks. In addition to developed parks, the City owns or manages over 6,970 acres of open space within and adjacent to San Luis Obispo, some of which provide trails that accommodate hiking and mountain biking. Tables 4.14-1 and 4.14-2 and Figure 4.14-1 describe the type, location, and amenities provided by parks and special facilities in San Luis Obispo.

The general characteristics of recreation facilities are described below.

Community Parks: Community parks are large and intended to serve the entire community. Usually identified by unique features, community parks may be constructed for specialized and active uses, and may include a wide range of facilities where members of the community can congregate. The parks may also include natural areas that can be used for passive recreation, such as nature trails for walking, viewing, and picnicking. San Luis Obispo has eight community parks, totaling approximately 113 acres.

Neighborhood Parks: Neighborhood parks are defined as areas that are convenient and accessible for active and passive recreation to residents in adjacent and nearby neighborhoods. Neighborhood parks often include turf playfields, playground equipment, and landscaped picnic/seating areas, and may provide facilities such as hard-surfaced courts, restrooms, group barbecues, natural or cultural features, and on-site parking. The optimum site for a neighborhood park is in the center of a neighborhood within safe walking or bicycling distance of neighborhood residents. Playfields are sometimes a component of neighborhood parks and can provide opportunities for organized recreation activities. San Luis Obispo has ten neighborhood parks, totaling approximately 34 acres.
<table>
<thead>
<tr>
<th>ID</th>
<th>Park Name</th>
<th>Address</th>
<th>Facilities</th>
<th>Acres</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Damon-Garcia Sports Fields</td>
<td>680 Industrial Way</td>
<td>4 regulation soccer fields with lights (configurable for up to 9 smaller fields); rentable concession stand; restrooms</td>
<td>20.00</td>
</tr>
<tr>
<td>2</td>
<td>Jack House Gardens</td>
<td>536 Marsh St.</td>
<td>Site of Historic Jack House; patio area with fountain; kitchen and utility building; barbeque area; restrooms; Washhouse Gift Shop</td>
<td>0.75</td>
</tr>
<tr>
<td>3</td>
<td>Laguna Lake Nature Park</td>
<td>504 Madonna Road</td>
<td>Group barbeque areas; 3 small picnic areas; par course fitness trail; disc golf course; restrooms; Laguna Lake fishing, sail boating, row boating; dog park</td>
<td>40.00</td>
</tr>
<tr>
<td>4</td>
<td>Meadow Park</td>
<td>2333 Meadow</td>
<td>Individual and group picnic/barbeque areas; 2 horseshoe pits; 2 sand volleyball courts; multi-use basketball court; softball field; playground; fitness course; walking trails; Community Garden</td>
<td>14.00</td>
</tr>
<tr>
<td>5</td>
<td>Mission Plaza</td>
<td>989 Chorro St.</td>
<td>Mission Plaza Amphitheater; Arbor Patio Area; Restrooms</td>
<td>4.00</td>
</tr>
<tr>
<td>6</td>
<td>Santa Rosa Park</td>
<td>Santa Rosa and Oak</td>
<td>2 group barbecue areas; drop-in picnic areas; 10 lighted horseshoe pits; lighted softball field; youth baseball field; lighted multi-use court for roller hockey, roller derby, and basketball; large playground area</td>
<td>11.00</td>
</tr>
<tr>
<td>7</td>
<td>Cuesta County Park</td>
<td>Loomis St.</td>
<td>large barbecue area; smaller barbecue pits; playground; small baseball field; volleyball court; restrooms; creek access</td>
<td>5.00</td>
</tr>
<tr>
<td>8</td>
<td>Sinsheimer Park</td>
<td>900 Southwood St.</td>
<td>2 group barbecue areas; 6 tennis courts; playground; nine-hole disc golf course; sand volleyball court; Railroad Recreational Trail; horseshoe pits; SLO Stadium; Stockton Field</td>
<td>23.50</td>
</tr>
</tbody>
</table>

**City Community Parks Acreage Subtotal**: 113.25

**Neighborhood Parks**

<table>
<thead>
<tr>
<th>ID</th>
<th>Park Name</th>
<th>Address</th>
<th>Facilities</th>
<th>Acres</th>
</tr>
</thead>
<tbody>
<tr>
<td>9</td>
<td>Anholm Park</td>
<td>870 Mission St.</td>
<td>picnic tables; play area</td>
<td>0.13</td>
</tr>
<tr>
<td>10</td>
<td>De Vaul Park</td>
<td>1651 Spooner St.</td>
<td>playground; picnic tables</td>
<td>0.90</td>
</tr>
<tr>
<td>11</td>
<td>Emerson Park</td>
<td>1316 Beach St.</td>
<td>sports field; basketball courts; bocce ball courts; children's play area; adult fitness zone; community garden; picnic tables</td>
<td>3.00</td>
</tr>
<tr>
<td>12</td>
<td>French Park</td>
<td>1040 Fuller Road</td>
<td>multi-use court; youth baseball/softball field; sand volleyball court; tennis court; 2 horseshoe pits; individual picnic/barbecue area; large barbecue area; children's playground</td>
<td>10.00</td>
</tr>
<tr>
<td>13</td>
<td>Mitchell Park</td>
<td>1400 Osos St.</td>
<td>playground; individual picnic tables; horseshoe pit</td>
<td>3.00</td>
</tr>
</tbody>
</table>
### Neighborhood Parks

<table>
<thead>
<tr>
<th>ID</th>
<th>Park Name</th>
<th>Address</th>
<th>Facilities</th>
<th>Acres</th>
</tr>
</thead>
<tbody>
<tr>
<td>14</td>
<td>Islay Hill Park</td>
<td>1151 Tank Farm Road</td>
<td>barbeque area; Bandstand youth baseball/softball field; basketball court;</td>
<td>5.00</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>tennis court; sand volleyball court; picnic areas; children's play area;</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>restrooms</td>
<td></td>
</tr>
<tr>
<td>15</td>
<td>Johnson Park</td>
<td>1020 Southwood</td>
<td>children's playground; large barbecue area; basketball courts; restrooms</td>
<td>4.50</td>
</tr>
<tr>
<td>16</td>
<td>Laguna Hills Park</td>
<td>890 Mirada</td>
<td>picnic tables; play area</td>
<td>3.50</td>
</tr>
<tr>
<td>17</td>
<td>Throop Park</td>
<td>510 Cerro Romauldo</td>
<td>picnic tables; play area; softball/baseball field; restrooms</td>
<td>3.00</td>
</tr>
<tr>
<td>18</td>
<td>Vista Lago Park</td>
<td>1170 Vista Lago</td>
<td>picnic tables; play area; benches</td>
<td>0.50</td>
</tr>
</tbody>
</table>

**Neighborhood Parks Acreage Subtotal**  
33.53

**Mini-Parks**

<table>
<thead>
<tr>
<th>ID</th>
<th>Park Name</th>
<th>Address</th>
<th>Facilities</th>
<th>Acres</th>
</tr>
</thead>
<tbody>
<tr>
<td>19</td>
<td>Buena Vista Park</td>
<td>100 Block of Buena Vista</td>
<td>circular grass area</td>
<td>0.44</td>
</tr>
<tr>
<td>20</td>
<td>Cheng Park</td>
<td>1038 Marsh. St.</td>
<td>Chinese commemoration theme, benches?</td>
<td>0.10</td>
</tr>
<tr>
<td>21</td>
<td>Eto Park</td>
<td>South and Brook St.</td>
<td>pond; bench area</td>
<td>0.25</td>
</tr>
<tr>
<td>22</td>
<td>Ellsford Park</td>
<td>San Luis Dr. Near California</td>
<td>2 creek side grass areas</td>
<td>1.00</td>
</tr>
<tr>
<td>23</td>
<td>Stoneridge Park</td>
<td>535 Bluerock Dr.</td>
<td>small, grass-covered neighborhood lot</td>
<td>0.50</td>
</tr>
<tr>
<td>24</td>
<td>Osos/Triangle Park</td>
<td>Santa Barbara St. at Osos</td>
<td>picnic site</td>
<td>0.32</td>
</tr>
<tr>
<td>25</td>
<td>Las Praderas Park</td>
<td>Las Praderas and Mariposa Dr.</td>
<td>creek side lot, 2 benches</td>
<td>1.76</td>
</tr>
<tr>
<td>26</td>
<td>Priolo-Martin Park</td>
<td>Vista del Collados and Vista del Arroyo</td>
<td></td>
<td>0.50</td>
</tr>
</tbody>
</table>

**Mini-Parks Acreage Subtotal**  
4.87

**Joint-Use Facilities (Not Included Towards Park Standard)**

<table>
<thead>
<tr>
<th>ID</th>
<th>Park Name</th>
<th>Address</th>
<th>Facilities</th>
<th>Acres</th>
</tr>
</thead>
<tbody>
<tr>
<td>27</td>
<td>Laguna Middle School</td>
<td>11051 Los Osos Valley Rd.</td>
<td>regulation baseball field; youth baseball field; soccer/athletic field;</td>
<td>8.7</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>tennis courts; outdoor</td>
<td></td>
</tr>
<tr>
<td>28</td>
<td>C.L. Smith Elementary School</td>
<td>1375 Balboa St.</td>
<td>baseball/softball diamonds; soccer and athletic fields; children's play</td>
<td>4.8</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>area; basketball courts</td>
<td></td>
</tr>
<tr>
<td>29</td>
<td>Sinsheimer Elementary School</td>
<td>2755 Augusta St.</td>
<td>gymnasium; youth baseball/softball field; large turf area</td>
<td>N/A</td>
</tr>
<tr>
<td>30</td>
<td>Hawthorne Elementary School</td>
<td>2125 Story St.</td>
<td>gymnasium; youth baseball/softball field; large turf area</td>
<td>N/A</td>
</tr>
<tr>
<td>31</td>
<td>Bishop Peak/Teach Elementary School</td>
<td>451 Jaycee Dr.</td>
<td>gymnasium; large turf area</td>
<td>N/A</td>
</tr>
<tr>
<td>32</td>
<td>Pacheco Elementary School</td>
<td>261 Cuesta Dr.</td>
<td>gymnasium, large turf area</td>
<td>N/A</td>
</tr>
</tbody>
</table>

**Total**  
151.65

*Source: General Plan Background Report, 2014*
### Table 4.14-2 Existing City of San Luis Obispo Special Facilities

<table>
<thead>
<tr>
<th>Facility Name</th>
<th>Address/Location</th>
<th>Amenities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Laguna Lake Golf Course</td>
<td>11175 Los Osos Valley Rd.</td>
<td>9-hole, 27 acre executive length golf course with additional features including small practice putting green and driving range, barbecue pit and picnic area and restrooms.</td>
</tr>
<tr>
<td>SLO Swim Center</td>
<td>900 Laurel Lane</td>
<td>Square feet totaling 43,720 that includes a 50 X 25 meter pool, separate tot pool, restrooms, locker rooms, and a multi-purpose room.</td>
</tr>
<tr>
<td>Jack House</td>
<td>536 Marsh St.</td>
<td>Multi-use building, main house, washhouse, shop and carriage house.</td>
</tr>
<tr>
<td>Ludwick Community Center</td>
<td>664 Santa Rosa St.</td>
<td>Game room, weight room, pottery and lapidary studio, 3 meeting rooms, gymnasium, preschool facility, shower facilities, and restrooms.</td>
</tr>
<tr>
<td>Senior Center</td>
<td>1445 Santa Rosa St.</td>
<td>Multi-use room, meeting room, small specialty meeting rooms, restrooms, and a kitchen.</td>
</tr>
<tr>
<td>Meadow Park Center</td>
<td>2333 Meadow St.</td>
<td>Multi-use facility and restrooms</td>
</tr>
<tr>
<td>Laurel Lane Community Gardens</td>
<td>Laurel Lane next to Fire Station</td>
<td>16 individual agriculture plots</td>
</tr>
<tr>
<td>Broad Street Community Gardens</td>
<td>North Broad St. near Highway 101 southbound exit</td>
<td>17 individual agriculture plots</td>
</tr>
<tr>
<td>Meadow Park Community Gardens</td>
<td>2333 Meadow St.</td>
<td>40 plots</td>
</tr>
<tr>
<td>Emerson Park Community Gardens</td>
<td>1316 Beach St.</td>
<td>39 plots</td>
</tr>
</tbody>
</table>

Source: General Plan Background Report, 2014
4.0 Environmental Impact Analysis

Figure 4.14-1
Parks Locations

Legend
- Land Use and Circulation Planning Subarea
- Parks
- City Limits
- Park ID Corresponds with Table 5.6-1

Source: City of San Luis Obispo; July 2012
Mini Parks: Mini parks are typically small recreational sites that provide neighborhoods or commercial areas with passive or active recreation facilities. This type of park may be appropriate in areas where larger parks are not feasible or accessible to residents and employees in the immediate area. San Luis Obispo has eight mini parks, totaling approximately five acres.

Joint Use Sites: Joint use sites include facilities and/or properties where long-term uses are shared between the City and another agency through a formal agreement. Joint use facilities typically have fields and gymnasiums on San Luis Coastal Unified School District property, and are available for recreation programs and public use after school hours.

Special Facilities: Special facilities such as pools, civic centers, and golf courses, provide specific recreation opportunities for residents and visitors.

b. Planned Recreation Facilities

There are several parks and new recreation facilities planned in the City of San Luis Obispo that would result in the development of new or improved parkland. The planned facilities include:

- Enhancement of the Santa Rosa Skate Park
- The Mid-Higuera Street Enhancement Plan (2001) identifies a future park and city “gateway” on the corner of Higuera Street and Madonna Road if the land can be obtained from Caltrans.
- 25.9 acres of sports fields (existing) and neighborhood parks in the Margarita Specific Plan area
- A 12-acre neighborhood park, 2 acres of linear and pocket parks, and a 2.5 acre trail-junction park in the Orcutt Specific Plan Area. An additional 4 acres is planned in conjunction with a joint use facility if the San Luis Coastal Unified School District establishes a new park in the Specific Plan.

Most of the previously approved but undeveloped parkland in the city would be located in the previously approved Margarita and Orcutt Specific Plan areas. In total, approximately 37.9 acres of additional parkland is planned but unbuilt. This unbuilt parkland acreage does not include 4.0 acres of joint use parks to be provided in the Orcutt Specific Plan area.

c. Parkland Standards

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, with at least five of each 10 acres developed as neighborhood parks. The City of San Luis Obispo has a population of 45,541 (CA DOF, 2013). Based on the City’s adopted parkland standard, approximately 455 acres of total parkland, including 228 acres of neighborhood parkland, should be provided in the city. There is currently about 151.65 acres of parkland in the city, of which 33.53 acres are neighborhood parks. This results in approximately 3.32 acres of total parkland per 1,000 residents, and 0.72 acres of neighborhood parks per 1,000 residents. Based on existing population and parks acreage conditions, the city needs an additional 303 acres of park land, of which 195 acres should be neighborhood parks, to meet its per capita parkland standard.

d. Regulatory Setting

Quimby Act (1975). The Quimby Act gives cities and counties the authority, by ordinance, to require the dedication of land or payment of in-lieu fees, or a combination of both, for park and recreation purposes as a condition of approval of a tract map or parcel map. The Quimby Act allows fees to be collected for up to five acres of parkland per 1,000 residents.

San Luis Obispo Parks and Recreation Element and Master Plan (2001). The City Parks and Recreation Element and Master Plan describes existing parks and recreation facilities, activities, and financing within the city. The Plan identifies unmet needs, details a park vision for the future, and outlines an implementation strategy for the development of new parks and recreation facilities and programs. The Element Policy 3.13.1 establishes a standard of 10 acres of parks space per 1,000 residents that must include five acres of neighborhood park and five acres of any other type of park.

Parkland Impact Fees. The Orcutt Area and Margarita Area Specific Plans have associated parkland impact fees to ensure dedication and development of parkland occurs. However, development in other areas of the City is not subject to park fees other than through Quimby Act fees collected with subdivisions.
4.14.2. Impact Analysis

a. Methodology and Significance Thresholds

The City has adopted a standard of providing 10 acres of parkland for each 1,000 residents, and under existing conditions does not meet that standard. Impacts of the LUCE Update are considered significant if, under General Plan buildout conditions, the existing per capita parkland acreage deficiency would be increased. Additionally, in accordance with Appendix G of the State CEQA Guidelines, an impact is considered significant if physical changes that could be facilitated by buildout of the LUCE Update would result in one or more of the following conditions:

- The project would increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; or
- The project includes recreational facilities or requires the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

b. Project Impacts

<table>
<thead>
<tr>
<th>Impact REC-1</th>
</tr>
</thead>
<tbody>
<tr>
<td>Buildout of the proposed LUCE Update would increase the population of the city and would facilitate the development of additional parkland. Buildout of the proposed LUCE Update would result in a small increase in total per capita parkland in the city when compared to existing conditions. Although the LUCE Update would not comply with the City’s per capita parkland standard, this would not result in a physical effect. Therefore the LUCE Update would result in a Class III, less than significant environmental impact related to the increased use of existing park and recreation facilities.</td>
</tr>
</tbody>
</table>

The City’s current per capita parkland standard is 10 acres per 1,000 residents. There are currently approximately 151.65 acres of parkland in the city, and based on a 2013 population of 45,541 (DOF, 2013), there is approximately 3.32 acres of parkland per 1,000 residents. Under existing conditions, the City’s per capita parkland standard is not achieved.

EIR Project Description Table 2.4-3 (Total Future Development Capacity within the Planning Subarea) indicates that buildout of the proposed Land Use Element could result in the development of approximately 4,904 new dwelling units in the city. When added to the City’s existing 20,697 dwelling units (DOF, 2013), a total of approximately 25,601 residential units would be located in the city under general plan buildout conditions. Using an average population of 2.29 persons per dwelling unit, the proposed Land Use Element Update would have the potential to support a city-wide population of approximately 58,626.

Approximately 151.65 acres of parkland currently exists in the city. As depicted on Project Description Table 2.4-3, buildout of the proposed Land Use Element would provide approximately 52.4 additional acres of parkland in the city, resulting in a total of approximately 204 acres of parkland.

Based on a potential buildout population of 58,626 and a total of 204 acres of parkland, the amount of per capita parkland in the city would be 3.44 acres per 1,000 residents, which is more per capita parkland than the existing 3.32 acres of parkland for each 1,000 residents currently provided. As such, implementation of the LUCE Update would result in a slightly improved parkland per capita ratio when compared to existing conditions.

To achieve the City’s parkland standard of 10 acres per 1,000 residents under proposed LUCE Update buildout conditions, approximately 586 acres of parkland would be required in the city. The increase in per capita parkland proposed by the LUCE Update would incrementally improve the existing condition in which the City’s per capita parkland standard is not achieved. In addition, the increase in per capita parkland would minimize the potential for an adverse increase in the use of existing parks or other recreational facilities such that substantial physical deterioration of the existing facilities would occur or be accelerated. Therefore, the LUCE Update would result in a less than significant environmental impact related to the use of existing park and recreation facilities.
Policy 3.13.1. of the Parks and Recreation Element (shown below) directs the City to develop and maintain 10 acres of parkland per 1,000 residents of City population. Policy 3.13.3 indicates that parks shall be designed to meet a variety of needs depending on size, location, features and user demands.

**Policy 3.13.1.** The City shall develop and maintain a park system at the rate of 10 acres of parkland per 1,000 residents. Five acres shall be dedicated as a neighborhood park. The remaining five acres required under the 10 acres per 1,000 residents in the residential annexation policy may be located anywhere within the City’s park system as deemed appropriate.

The determination of what is and is not calculated into meeting the parkland requirements for the community influences the determination of per capita results. For instance, the 27 acres associated with the Laguna Golf Course is not added to the parkland area despite serving as a recreational facility for the community. The nearly 14 acres of joint use facilities are also not counted toward parkland area for reasons of limited times of use (must occur when schools are not in session) and also due to their contractual nature of availability (the City neither owns nor controls these sites). The City’s Class I bikeways are not counted toward parkland area. Cuesta Park, a county-owned facility of which one-half is located within City limits, is not included in parkland calculations. However, all of these sites provide recreational and parks opportunities to residents in the community.

Because the City’s park standard set by the Parks and Recreation Element is 10 acres per 1,000 residents, and the ability to collect fees through Quimby Act is limited to 5 acres per 1,000 residents, the City does not have a financing mechanism to achieve its per capita park acreage goal. Recommendations to address this condition include, but are not limited to, the following additions to the Parks and Recreation Element:

- Development may be required to fund or dedicate parkland greater than what is required through the Quimby Act in order to meet the community’s needs and goals for parkland.
- The City shall pursue a gift of Cuesta Park from the County to the City as part of the City’s parkland system.

The General Plan recommendations listed above would have the beneficial effect of providing additional opportunities to improve compliance with the City’s 10 acres per 1,000 residents parkland standard. Although the LUCE Update would result in less than significant environmental impacts related to the provision of parkland in the city, 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 goal 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.

**Proposed Land Use Element Development Special Planning Areas**

In addition to the proposed specific and area plans described above, the LUCE Update identifies six potential future development sites that could provide approximately 412 new dwelling units. These sites include the following:

- Foothill @ Santa Rosa area (80 units);
- Caltrans site (53 units);
- General Hospital site (41 units);
- Pacific Beach site (38 units);
- LOVR Creekside area (159 units); and
- Broad Street at Tank Farm Road site (41 units).

The potential residential units on these sites would support a population of approximately 943 people, which would generate an additional parkland demand of approximately 9.4 acres. As indicated on Project Description Table 2.4-3, approximately 3.5 acres of parkland would be located on the Caltrans site, and 2.7 acres of parkland would be located on the LOVR Creekside area, for a total of 6.2 acres of new parkland. The combined parkland area provided by the proposed special planning areas would not meet the City’s parkland standard of 10 acres per 1,000 residents, however, this is not considered to result in or contribute to a significant recreation-related environmental impact because on a city-wide basis
the proposed Land Use Element Update would result in an increase in the existing per capita parkland area in the city, and would not result in an increase in the use of existing neighborhood and regional parks or other recreational facilities such that a substantial physical deterioration of the facility would occur.

Proposed Circulation Element Street Network Changes

The Circulation Element Update identifies seventeen proposed street network and other circulation system changes. The proposed changes would generally consist of bicycle- and pedestrian-related improvements; transit system additions; street realignments, extensions and connections; freeway on- and off-ramp modifications; and traffic flow modifications. These types of circulation system modifications would not result in or contribute to a significant recreation impact because they would not increase the population of the city or increase the demand for recreation facilities.

Proposed Land Use Element Specific Plan Areas

The proposed Land Use Element Update would result in the establishment of three new specific plan areas in the city: San Luis Ranch, Madonna on LOVR, and Avila Ranch. As indicated on Project Description Table 2.4-3, the San Luis Ranch Specific Plan would have the potential to provide approximately 500 residential units; the Madonna on LOVR project would provide approximately 115 units; and the Avila Ranch project would provide approximately 700 units, for a total of approximately 1,315 residential units. In addition, future development proposed by the South Broad Street Area Plan would have the potential to provide approximately 589 additional dwelling units. In total, the proposed specific plans and area plan could result in the development of 1,904 new dwelling units. Based on an average dwelling unit occupancy rate of 2.29 people, the proposed specific plans and Broad Street Area Plan could support a population of approximately 4,360 people. To achieve the City’s parkland standard of 10 acres per 1,000 residents, a total of approximately 43 acres of parkland would be required to serve the combined population of the proposed specific plans and the area plan. New parkland would be provided on the San Luis Ranch Specific Plan, Avila Ranch Specific Plan, and Madonna at LOVR Specific Plan sites. The size, location, and uses of parkland area provided by the proposed specific plans and area plan has not yet been defined and may not meet the City’s parkland standard of 10 acres per 1,000 residents, however, this is not considered to result in or contribute to a significant recreation impact because on a city-wide basis the proposed Land Use Element Update would result in an increase in the existing per capita parkland area in the city, and would not result in an increase in the use of existing neighborhood and regional parks or other recreational facilities such that a substantial physical deterioration of the facility would occur.

Applicable LUCE Update Policies

The General Plan Land Use Element Update includes policies intended to minimize and mitigate for potential impacts related to the provision of park facilities for existing and proposed development, including the following:

2.1.1 Mixed Uses &and Convenience. The City shall promote Neighborhoods shall include a mix of compatible uses in neighborhoods to serve the daily needs of nearby residents, including schools, parks, churches, and convenience retail stores. Neighborhood shopping and services should be available within about one mile of all dwellings. When nonresidential, neighborhood-serving uses are developed, existing housing shall be preserved and new housing added where possible. If existing dwellings are removed for such uses, the development shall include replacement dwellings (no net loss of residential units).

New Policy

The City shall increase Downtown green space and public parks, including pocket parks, as the number of people living Downtown increases.

Applicable Existing City Policies

Consistent with the City’s commitment to provide recreational facilities for citizens, the existing General Plan Parks and Recreation Element includes extensive policies and programs intended to minimize and mitigate for potential impacts related to the provision of park facilities for existing and proposed development, including the following:

Policy 3.13.4 The Park and Recreation Element and Master Plan shall support the downtown plan concept by encouraging the development of the identified recreation areas found in the Conceptual Physical Plan for the City’s Center.
Policy 3.13.5 Park amenities (such as athletic fields, play equipment, skateboarding area, amphitheaters) will be developed, based on funding availability and community demand.

Policy 3.13.6 Lease or sale of City-owned parkland is discouraged unless such an action meets a demonstrated need which cannot otherwise be met.

Policy 3.13.7 Provisions must be made to replace any parkland sold with an equal amount of land at another location.

Policy 3.14.3 New significant residential developments and annexations shall provide sufficient athletic fields to meet the demands of the youth who will reside in the development.

Program 1. As space becomes available, additional fields will be added in the vicinity of the Damon-Garcia Sports Complex.

Policy 3.15.1 San Luis Obispo residents shall have access to a neighborhood park within .5 to 1.0 mile walking distance of their residence.

Policy 3.15.3 All residential annexation areas shall provide developed neighborhood parks at the rate of 5 acres per 1000 residents.

Policy 3.15.4 In neighborhoods where existing parks do not adequately serve residents, mini-parks may be considered.

Policy 3.19.1 As space and funding are available and as public need is indicated, special recreation areas shall be constructed.

Program 1 The Playground Equipment Replacement Program shall continue to be implemented

Policy 3.21.2 The City will encourage private agencies to support or provide facilities to satisfy unmet demands.

Policy 3.21.3 Where possible, the joint use of facilities between the City and the S.L.C.U.S.D. should be expanded. Joint use may include gymnasiums, stadiums, classrooms, pools, athletic fields, and play equipment.

Policy 4.2.1 The City will assign the highest recreation priority to providing services and activities for the residents of San Luis Obispo.

Policy 5.0.1 The City shall continue to acquire and develop parkland through the development review and annexation process.

Policy 5.0.2 For annexation areas, at least 10 acres of developed parkland for each 1000 new residents shall be provided by the developer.

Policy 5.0.3 Staff shall pursue all appropriate State and Federal grant programs for project and acquisition funding.

Policy 5.0.4 The City Council shall review park-in-lieu fees periodically to ensure that they stay consistent with land acquisition and development costs.

Policy 5.0.5 Park-in-lieu fees shall be committed to a project within two years from collection and shall have a direct benefit to the area for which they were intended.

Program 6.0.3 Develop joint use agreements with other public agencies, in addition to the current agreement with the San Luis Coastal School District, to maximize the use of existing facilities.

Program 6.0.5 Insure that athletic fields are provided within new residential developments within the community.

Program 6.2.1 Construct mini-parks on Purple Sage Drive [the Rodriguez Adobe] and at the corner of Marsh and Santa Rosa Streets through the City’s normal Capital Improvement process.

Program 6.2.2 Support efforts of neighborhoods lacking adequate park space to develop mini-parks.
Continued implementation of the general plan policies and programs identified above, implementation of park-related improvements and policies identified by the proposed LUCE Update, and the implementing statutes of the Municipal Code/Zoning Code, will ensure that environmental impacts to existing parkland and other facilities caused by an increase in use remain less than significant. No additional policy direction is required. Individual developments will be required to undergo separate environmental review, which may identify impacts that require project specific mitigation consistent with these policies.

Mitigation Measures

The proposed LUCE Update would result in less than significant recreation-related environmental impacts and no mitigation measures are required. Although the LUCE Update would result in less than significant environmental impacts related to the provision of parkland in the city, 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 goal 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 and no mitigation is required.

Significance After Mitigation

The proposed LUCE Update would increase the existing amount of per capita parkland in the city. As a result, the proposed Project would not result in an adverse increase in the use of parks or other recreation facilities such that a substantial physical deterioration of existing facilities would occur or be accelerated. Therefore, the LUCE Update would result in a less than significant (Class III) recreation-related environmental impact and no mitigation measures are required.

The increase in per capita parkland proposed by the LUCE Update would incrementally improve the existing per capita parkland conditions in the city and the General Plan Parks and Recreation Element recommendations discussed above would have the beneficial effect of providing additional opportunities to improve compliance with the City’s 10 acres per 1,000 residents parkland standard, but this would not result in achieving city-wide consistency with the existing parkland acreage standard. It is important to note that the City’s per capita parkland ratio goal 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.

Impact REC-2

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.

The construction and use of park facilities adjacent to residential areas has the potential to result in significant environmental impacts related to issues such as traffic, noise, dust generation and emissions, night lighting and land use compatibility. Existing General Plan policies applicable to future park project design would substantially reduce the potential for park-related environmental impacts. In addition, subsequent CEQA review would identify project-specific impacts and provide measures to reduce potential impacts to the extent possible. Furthermore, most of the future parkland to be provided in the city would be constructed as part of the buildout of previously approved (Margarita and Orcutt) or proposed (San Luis Ranch, Avila Ranch, Madonna) specific plans, which would facilitate park planning and design opportunities to minimize environmental impacts and land use conflicts. Therefore, potential adverse physical effects on the environment resulting from future park development and use would be reduced to a less than significant level through the implementation of proposed policy and project-specific CEQA requirements.
Applicable LUCE Update Policies

The General Plan Land Use Element Update includes policies intended to minimize and mitigate for potential impacts related to park facility development, including the following:

2.1.2 Separation and Buffering.

The City shall seek to protect residential areas from incompatible and detrimental non-residential activities and facilities, including most commercial and manufacturing businesses, traffic arteries, the freeway, and the railroad. Residential areas should be protected from encroachment by detrimental commercial and industrial activities.

12.3.11 Environmental Review

The purpose of the City's Environmental Review process is to develop and maintain a high quality environment now and in the future. Some projects may be exempted from environmental review by state law or city procedures. For those projects subject to environmental review, features to be examined would include but not be limited to, toxic contamination, air quality, open space preservation, sustainability impacts, scenic values and impacts, airport operations, ground slopes, seismic hazards, soil and groundwater characteristics, wildlife habitats, road and rail traffic noise, water and sewer service limits, access and circulation, and historic and archaeological resources. The two common types of environmental documents are environmental impacts reports and “initial studies.” Before considering private proposals for a major development, such as a specific plan or special-design area, the City must conduct an evaluation of environmental opportunities and constraints, to which a private proposal can respond. The City is committed to early and meaningful participation by the community in the environmental review process to help inform the public and decision-makers of the potential environmental consequences of their actions. Features to be examined would include toxic contamination, airport operations, ground slopes, seismic hazards, soil and groundwater characteristics, significant wildlife habitats, road and rail traffic noise, water and sewer service limits, access and circulation, and historic and archaeological resources.

Future development under the LUCE Update will be required to comply with local, State, and Federal laws and policies, and all applicable permitting requirements of the regulatory and oversight agencies intended to address potential impacts resulting from future development of parks facilities. No additional policy direction is required to ensure impacts remain less than significant. Individual development will be required to undergo separate environmental review, which may result in specific impacts that require project specific mitigation consistent with these policies.

Mitigation Measures

The implementation of Policy 2.2.2 would require the implementation of design measures such as increased setbacks between certain park-related facilities (e.g. parking lots and active play areas) and adjoining uses; the use of landscape and other buffers; and orientation of active recreation facilities away from adjoining uses. Buffering from park-related facilities will help reduce impacts related to potential park facility development (i.e., operational impacts and construction related impacts such as noise, traffic, night lighting and dust/air quality) to less than significant levels by further separation between potentially incompatible land uses.

In addition to Policy 2.2.2 and other General Plan policies, subsequent CEQA review would identify project-specific impacts and provide measures to reduce potential impacts to the extent possible. Furthermore, most of the future parkland to be provided in the city would be constructed as part of the buildout of previously approved (Santa Margarita and Orcutt) or proposed (San Luis Ranch) specific plans, which would facilitate park planning and design opportunities to minimize environmental impacts and land use conflicts. Therefore, potential adverse physical effects on the environment resulting from future park development

The proposed LUCE Update would result in less than significant recreation-related environmental impacts and no mitigation measures are required.
Significance After Mitigation

With incorporation of the above City policies and programs, the proposed LUCE Update would result in less than significant park development and use impacts.

4.14.3. Cumulative Impacts

Cumulative impacts of the proposed LUCE Update include the development of previously approved but unbuilt parks, and parkland proposed by the LUCE Update. Existing and proposed park facilities would incrementally increase the amount of per capita parkland area in the city.

As a General Plan Update, cumulative impacts are treated somewhat differently than would be the case for a project-specific development. By its nature, the LUCE Update considers cumulative development within the city and potential expansion areas. Thus, cumulative impacts are generally equivalent to project-specific impacts.

Impacts related to the provision of parks for additional residents and development of potential new parks as a result of the LUCE Update have been addressed in the paragraphs above. The combination of these impacts reflects the cumulative impacts of the proposed LUCE Update. As noted above, the existing General Plan and proposed LUCE Update policies and programs along with the continued implementation Quimby Act fees and the general increase in the amount of per capita parkland in the city as a result of the LUCE Update will address the provision and development of park facilities. These programs and policies will reduce environmental impacts from new development, as well as buildout of Specific Plan and Special Planning Areas identified in the LUCE Update to a less than significant level.
Please see the next page.
This section reviews the City of San Luis Obispo Land Use and Circulation Element Update’s (LUCE Update) potential impacts with respect to traffic congestion and mobility. Specifically, changes in roadway and intersection level of service, bicycle and pedestrian access, and transit services are discussed.

4.15.1. Setting

The purpose of this section is to provide a setting for the city with respect to traffic, mobility and circulation. The transportation setting for the city was discussed in detail in Section 4, Transportation and Circulation, of the corresponding City of San Luis Obispo General Plan Update Background Report. Refer to the Background Report, which is incorporated herein by reference, for additional details with respect to the city’s transportation and circulation setting.

The Background Report reviews the existing context for all modes of transportation in the City of San Luis Obispo. It describes the key transportation infrastructure and services in the city, and how they are addressed in the existing General Plan. It also describes the regulatory environment as it relates to transportation.

a. Transportation System Overview

The city is accessed primarily by roadways including US 101, State Route (SR) 1 and SR 227. Routes of regional significance providing access include Los Osos Valley Road, Foothill Road, Broad Street, O’Connor Way, Prefumo Canyon Road, South Higuera Street and Orcutt Road. The city is accessed by air via the San Luis Obispo County Regional Airport or by rail via Amtrak’s Pacific Surfliner and Coast Starlight routes. The local roadway system is characterized by a regular street grid in the downtown area and neighborhood street patterns in other parts of the city. US 101 and the Union Pacific Rail Corridor are significant barriers to local street connectivity as is the topography of the land in several parts of the city. Figure 4.15-1 displays the city’s roadway, airport and rail system, Figure 4.15-2 shows transit routes within the city, and Figure 4.15-3 shows the city’s bicycle facilities.

SLO Transit is the City’s fixed-route bus program, which serves the public within the city limits, surrounding county areas and the Cal Poly campus. The program operates seven routes throughout the city on weekdays, five routes after-hours on weekdays during the school year, six routes on Saturdays and four routes on Sundays. In addition to the fixed route system, SLO Transit operates the Downtown Trolley, a shuttle service geared towards visitors that operates Thursdays through Saturdays between the downtown commercial area and hotels located along Monterey Street. The San Luis Obispo Regional Transit Authority (RTA) is a joint powers authority operating fixed-route bus service in San Luis Obispo County. RTA services provide direct connections between the City of San Luis Obispo and communities along US 101 from Santa Maria to San Miguel and to the Pacific Coast at Morro Bay and Osos. RTA also provides complementary Americans with Disabilities Act (ADA) paratransit service through Runabout, a demand response system. Runabout operates within ½ mile of all fixed-route services in the county during the same hours/days as local and regional fixed-route services.

Additionally, the incorporated City of San Luis Obispo currently contains:

- 7.2 miles of Class I Bicycle Paths
- 29.7 miles of roadway with Class II Bicycle Lanes
- 24.0 miles of Class III Bicycle Routes.
Figure 4.15-2
City of San Luis Obispo Roads, Transit
Bicycle traffic in the City of San Luis Obispo is particularly heavy during peak commute periods, mid-day in downtown and throughout the day between downtown and the Cal Poly campus. Additional facilities exist to make connections across unincorporated areas as well as where city boundary irregularities take key facilities outside of city limits. Currently, constructed Class I Bicycle Paths do not form a continuous network across the city and exist largely in isolated segments. The Class II Bicycle Lane network is more fully developed, establishing crosstown connectivity along the Higuera Street / Madonna Road corridors east and west and the Santa Rosa Street / Broad Street corridors north and south. Additional Class II and Class III facilities provide system access to most of San Luis Obispo neighborhoods.

For pedestrians, the city has an established system of sidewalks. The system provides access to many sites that attract a lot of pedestrian traffic, including schools, residential and commercial areas, outdoor and indoor recreational facilities, and places of worship. The most notable gaps in the current sidewalk network are:

- residential neighborhoods between US 101 and Cal Poly,
- residential neighborhoods on both sides of E. Foothill Boulevard between Patricia Drive and Tassajara Drive,
- San Luis Drive north of Cazadero Street, and
- Pepper Street, particularly on the east side.

b. Roadways

The roadways within the City of San Luis Obispo are the backbone of the city’s transportation network. The roadway system consists of Freeway (US 101) and the surface network which is made up of arterials, collectors, and local roadways.

**Functional Roadway Classifications.** Roads are typically classified and defined by their function. Common classifications are as follows.

- **Freeways.** Operated and maintained by the California Department of Transportation (Caltrans), these facilities are designed as high-volume, high-speed facilities for intercity and regional traffic with limited access.
- **Expressways.** These facilities are high-speed roadways for inter community travel. They generally have 4-6 lanes, and access and intersections are usually controlled. Expressways typically carry traffic between important centers of activity or employment.
- **Arterials.** These facilities, including major and minor arterials, are the principal network for through-traffic within a community and often between communities. Carrying 25,000-45,000 trips per day, although some carry fewer trips, arterials provide access routes to shopping areas, places of employment, recreational areas, and other places of assembly. Minor arterials include 2-4 lanes; major arterials, 4-6.
- **Collectors.** Two-lane facilities, collectors function as the main interior streets within neighborhoods and business areas. They are designed to carry fewer than 10,000 vehicles per day and serve to connect these areas with the higher classification roadways.
- **Local.** These facilities are two-lane streets that provide local access and service. They include residential, commercial, industrial, and rural roads.

**Local Roadways.** Although federal transportation regulations mandate the use of a federal classification system, local jurisdictions, such as City of San Luis Obispo, also develop classification systems to define their own roadways. The descriptions and standards of streets are shown in Table 4.15-1. Figure 4.15-4 depicts the classification of a particular street segment within the City.

A total of 75 roadway segments in the local, county, and state roadway system were studied using the City’s AADT LOS thresholds (per Florida Department of Transportation (FDOT) Methodology). The thresholds and analysis results have been included in Appendix M. The City of San Luis Obispo considers roadways operating at LOS D or better to be acceptable, excepting segments downtown where LOS is allowed to drop to E. The only segment noted to be deficient under existing conditions is Broad Street south of Buckley Road, which is under State of California and County jurisdiction. While this segment is outside the City Limit, it is an important gateway to the city, so is relevant to this EIR. Study segments are shown on Figure 4.15-5.
San Luis Obispo Roadway Classification Map (including Future Roadways)

Street Classification
- Freeway
- Highway / Regional Route
- Arterial
- Residential Arterial
- Commercial Collector
- Residential Collector
- Local
- Parkway Arterial

Future Roadways
- Arterial
- Commercial Collector
- Residential Collector
- Local

City Limits

Figure 4.15-4
San Luis Obispo Roadway Classification Map (including Future Roadways)

June 2014
**Table 4.15-1  San Luis Obispo Street Types**

<table>
<thead>
<tr>
<th>Street Types</th>
<th>Desired Max ADT/LOS (1)</th>
<th>Desired Max MPH (2)</th>
<th>Travel Lanes</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Local Commercial Streets</strong></td>
<td>5,000</td>
<td>25</td>
<td>2</td>
</tr>
<tr>
<td>directly serve nonresidential development that front them and channel traffic to commercial collector streets.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Local Residential Streets</strong></td>
<td>1,500</td>
<td>25</td>
<td>2</td>
</tr>
<tr>
<td>directly serve residential development that front them and channel traffic to residential collector streets.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Commercial Collector Streets</strong></td>
<td>10,000</td>
<td>25</td>
<td>2</td>
</tr>
<tr>
<td>collect traffic from commercial areas and channel it to commercial arterials.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Residential Collector Streets</strong></td>
<td>3,000</td>
<td>25</td>
<td>2</td>
</tr>
<tr>
<td>collect traffic from residential areas and channel it to arterials.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Residential Arterials</strong></td>
<td>LOS D</td>
<td>35</td>
<td>2</td>
</tr>
<tr>
<td>are bordered by residential property where preservation of neighborhood character is as important as providing for traffic flow and where speeds should be controlled.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Arterial Streets</strong></td>
<td>LOS E (Downtown)</td>
<td>25</td>
<td>2-4</td>
</tr>
<tr>
<td>provide circulation between major activity centers and residential areas.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Parkway Arterials</strong></td>
<td>LOS D</td>
<td>45</td>
<td>4-6</td>
</tr>
<tr>
<td>are arterial streets with landscaped medians and roadside areas where the number of cross streets is limited and direct access from fronting properties is discouraged.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Highway/Regional Routes</strong></td>
<td>LOS D</td>
<td>45 (In City)</td>
<td>2-6</td>
</tr>
<tr>
<td>connect the City with other parts of the county and are used by people traveling throughout the county and state and are designated as primary traffic carriers. Segments of these routes leading into San Luis Obispo should include landscaped medians and roadside areas to better define them as community entryways.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Freeway</strong></td>
<td>LOS D</td>
<td>55</td>
<td>4-6</td>
</tr>
<tr>
<td>is a regional route of significance where access is controlled.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Table 4.15-2. Local Roadway LOS (Per ADT Threshold)**

<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>1</td>
<td>Augusta (Bishop – Laurel) W / Laurel</td>
<td>Collector</td>
<td>2</td>
<td>NO</td>
<td>YES</td>
<td>2,688</td>
</tr>
<tr>
<td>3</td>
<td>Broad ( S / South)</td>
<td>Regional Route</td>
<td>4</td>
<td>YES</td>
<td>YES</td>
<td>29,980</td>
</tr>
<tr>
<td>4</td>
<td>Broad (Foothill – Lincoln)</td>
<td>Collector</td>
<td>2</td>
<td>NO</td>
<td>NO</td>
<td>4,799</td>
</tr>
<tr>
<td>5</td>
<td>Broad (Monterey - Marsh)</td>
<td>Collector</td>
<td>2</td>
<td>NO</td>
<td>NO</td>
<td>5,867</td>
</tr>
<tr>
<td>6</td>
<td>Broad (Marsh – Upham)</td>
<td>Arterial</td>
<td>2</td>
<td>NO</td>
<td>NO</td>
<td>9,479</td>
</tr>
<tr>
<td>7</td>
<td>Broad (Upham – South)</td>
<td>Arterial</td>
<td>4</td>
<td>YES</td>
<td>YES</td>
<td>13,526</td>
</tr>
<tr>
<td>8</td>
<td>Broad (South – Orcutt)</td>
<td>Arterial</td>
<td>4</td>
<td>YES</td>
<td>YES</td>
<td>29,980</td>
</tr>
<tr>
<td>9</td>
<td>Broad (Orcutt – Tank Farm Road)</td>
<td>Regional Route</td>
<td>4</td>
<td>YES</td>
<td>YES</td>
<td>26,308</td>
</tr>
<tr>
<td>10</td>
<td>Broad (Tank Farm Road – Buckley)</td>
<td>Regional Route</td>
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*June 2014*
### Key Intersections

Intersections are the primary source of delay and conflict in the transportation system. This is particularly true where multiple transportation modes are sharing the roadway. A total of 102 intersections were analyzed as part of the LUCE Update. All analyzed intersections reflect existing infrastructure. Newly created intersections resulting from the Proposed Project were analyzed as part of the Sensitivity Analysis documented in Appendix N. Given that newly created intersections are sized and configured based on design considerations and that these facilities will be formally analyzed at the time of project specific environmental review, they were not formally included herein. The study intersections are listed in Table 4.15-3. The locations of the study area intersections and the geometric configurations are provided in Appendix M.

#### Table 4.15-3. Study Intersections

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4.0 Environmental Impact Analysis

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<td>43</td>
<td>Santa Rosa Street</td>
<td>Mill Street</td>
<td>94</td>
<td>Broad Street</td>
<td>Rockview Place</td>
</tr>
<tr>
<td>44</td>
<td>Johnson Avenue</td>
<td>Mill Street</td>
<td>95</td>
<td>Broad Street</td>
<td>Capitolio Way</td>
</tr>
<tr>
<td>45</td>
<td>California Boulevard</td>
<td>Mill Street</td>
<td>96</td>
<td>Johnson Avenue</td>
<td>Orcutt Road</td>
</tr>
<tr>
<td>46</td>
<td>Santa Rosa Street</td>
<td>Palm Street</td>
<td>97</td>
<td>Broad Street</td>
<td>Industrial Way</td>
</tr>
<tr>
<td>47</td>
<td>Santa Rosa Street</td>
<td>Monterey Street</td>
<td>98</td>
<td>Broad Street</td>
<td>Tank Farm Road</td>
</tr>
<tr>
<td>48</td>
<td>Johnson Avenue</td>
<td>Monterey Street</td>
<td>99</td>
<td>Poinsettia Street</td>
<td>Tank Farm Road</td>
</tr>
<tr>
<td>49</td>
<td>California Boulevard</td>
<td>Monterey Street</td>
<td>100</td>
<td>Brookpine Drive</td>
<td>Tank Farm Road</td>
</tr>
<tr>
<td>50</td>
<td>Grand Avenue</td>
<td>Monterey Street</td>
<td>101</td>
<td>Broad Street</td>
<td>Aero Drive</td>
</tr>
<tr>
<td>51</td>
<td>Santa Rosa Street</td>
<td>Higuera Street</td>
<td>102</td>
<td>Broad Street</td>
<td>Airport Way</td>
</tr>
</tbody>
</table>

Note: *Italicized locations are controlled by Caltrans.*
d. Neighborhood Traffic Management

In June 1998, the City Council adopted a comprehensive 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.

Neighborhood areas may be eligible for traffic management plan efforts if traffic volumes and speeds exceed maximum levels established in Policy 6.2 of the Circulation Element.

- Over 25 neighborhoods have requested the development of a traffic management plan since the program was developed in 1998.
- Addressing traffic speed has been the main reason for requesting a traffic management plan with 20 neighborhoods experiencing higher speeds than the City’s desired 85th percentile.
- The average daily traffic in five of these 25 neighborhoods exceeded the City’s desired maximum volumes for Residential Collector and Local streets in 2012. The neighborhoods with studied streets that exceed the ADT thresholds include:
  - Monterey Heights
  - Murray
  - Patricia
  - Ramona/Verde
  - Woodbridge
- The Neighborhood Traffic Management Program has been successful in addressing excessive neighborhood traffic speed and volumes.
- Funding for the Neighborhood Traffic Management Program is considered every two years during the City’s Financial Planning process. Funding for the program has varied significantly with some years receiving no funding.

e. Roadway Operations

Traffic analyses are based on the concept of level of service (LOS). LOS is a qualitative measure of the effect of a number of factors, including speed and travel time, traffic interruptions, freedom to maneuver, driving comfort and convenience. LOS are designated A through F from best to worst, which cover the entire range of traffic operations that might occur. LOS A represents essentially free-flow conditions, and LOS F indicates substantial congestion and delay.

Freeways. Freeway segments are analyzed in terms of density, which is expressed as passenger cars per lane per mile. The density analysis for US 101 revealed that all sections currently operate acceptably at LOS D or better.

Local Roadways. As presented in the Background Report Section 4, the local roadways and key study intersections currently operate acceptably with the exception of the following locations:

- Broad Street south of Buckley Street currently exceeds FDOT’s ADT thresholds and is operating unacceptably at LOS E or worse. This segment is outside of City Limits, but is a key corridor into and out of town.
- Five study intersections currently (2012) operate at unacceptable levels of service (LOS), E or F, during the AM, Noon, or PM peak hours. All five intersections are fully under the jurisdiction of the City of San Luis Obispo. These intersections are as follows:
  - Taft Street and California Boulevard (#12)
  - California Boulevard and San Luis Drive (#55)
  - Madonna Road and Los Osos Valley Road (#68)
  - Vachell Lane and Higuera Street (#83)
  - Airport Drive and Broad Street (#102)
4.0 Environmental Impact Analysis

f. Regulatory Setting

There are a number of federal, state, and local regulations that govern traffic and transportation. The City of San Luis Obispo General Plan Update Background Report provides a detailed listing of relevant regulations and governing bodies. Applicable regulations and plans are summarized with a full list of regulations and materials in the Background Report containing more information.

The following are the federal, state and local regulations and plans that pertain directly to vehicular circulation systems in the city.

Federal

**Manual on Uniform Traffic Control Devices (MUTCD).** The MUTCD defines the standards used by road managers nationwide to install and maintain traffic control devices on all public streets, highways, bikeways, and private roads open to public traffic. The MUTCD is published by the Federal Highway Administration (FHWA) under 23 Code of Federal Regulations (CFR), Part 655, Subpart F. The MUTCD, which has been administered by the FHWA since 1971, is a compilation of national standards for all traffic control devices, including road markings, highway signs, and traffic signals. It is updated periodically to accommodate the nation's changing transportation needs and address new safety technologies, traffic control tools, and traffic management techniques.

**Surface Transportation Assistance Act Routes (STAA – Federal Designation).** Act passed in 1982 that allows large trucks to operate on the interstate and certain primary routes collectively called the National Network. These routes, referred to as STAA routes, calls for providing turning radii that can accommodate movements by large, articulated trucks.

State

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. Federal highway standards are implemented in California by Caltrans.

**California Manual on Uniform Traffic Control Devices.** Caltrans adopted the 2012 California Manual on Uniform Traffic Control Devices (California MUTCD) to provide for uniform standards and specifications for all official traffic control devices in California. This action was taken pursuant to the provisions of California Vehicle Code Section 21400 and the recommendation of the California Traffic Control Devices Committee (CTCDC). The Department requested and has received a letter to confirm substantial conformance from the Federal Highway Administration (FHWA) for California MUTCD 2012 edition.

**California Complete Streets Act of 2008 (AB-1358).** This law requires cities and counties to include complete streets policies as part of their general plans so that roadways are designed to safely accommodate all users, including bicyclists, pedestrians, transit riders, children, the elderly and persons with disabilities, as well as motorists. It will complement an existing policy, which directs Caltrans to “fully consider the needs of non-motorized travelers (including pedestrians, bicyclists, and persons with disabilities) in all programming, planning, maintenance, construction, operations and project development activities and products.” Beginning January 2011, any substantive revision of the circulation element in the general plan of a California local government will include complete streets provisions.

**CEQA Reform Through SB-743.** SB-743 requires the Governor’s Office of Planning and Research (OPR) to update the CEQA Guidelines and establish “criteria for determining the significance of transportation impacts of projects within transit priority areas.” OPR’s initial evaluation of existing metrics suggested that vehicle delay and LOS may perform counter to goals such as greenhouse gas reduction and accommodation of all modes. Some alternative metrics were identified in the law, including vehicle miles of travel (VMT) and vehicle trip generation rates. These metrics can help identify how projects...
(land development and infrastructure) influence emissions as well as accessibility of resources; however, they do not provide information about how the transportation network performs or functions with respect to efficiency or user experience. Accessibility as well as travel time and delay experienced by users are important planning objectives in many communities. SB-743 does not prevent a city from continuing to analyze delay or LOS as part of other plans, studies or ongoing network monitoring, but these metrics may no longer constitute the sole basis for CEQA impacts. OPR expects to publish the final draft of changes to the CEQA Guidelines by July 1, 2014, but the guidelines will not be applied until several months later.

Regional

Regional Transportation Plan. As the regional transportation planning agency for San Luis Obispo County, the SLOCOG developed and adopted the 2010 Regional Transportation Plan (RTP). The RTP complies with State and Federal transportation-planning requirements required of urbanized counties for a comprehensive and long-range transportation plan. The RTP is a financially constrained, multi-modal plan that identifies regional transportation improvements needed to improve system maintenance and operations, and to improve mobility and accessibility countywide.

San Luis Obispo Regional Transit District. The San Luis Obispo Regional Transit Authority (SLORTA) is administered by SLOCOG. The Board consists of twelve delegates; five members from the County Board of Supervisors and one representative from each of the seven cities in the region: Arroyo Grande, Atascadero, Grover Beach, Morro Bay, Paso Robles, Pismo Beach and San Luis Obispo.

Local

City of San Luis Obispo Circulation Element. In accordance to San Luis Obispo’s 2004 General Plan’s Section 6.2, Descriptions and Standards for Streets Classification, acceptable traffic operating conditions are LOS E in the Downtown and LOS D outside of the Downtown.

City Specific Plans. The City has several adopted specific plans that include notable circulation infrastructure.

Margarita Area Specific Plan. The Margarita Area is located in the southern part of the City and is bounded by South Higuera Street, Broad Street, Tank Farm Road, and the ridge of the South Hills. The plan provides a comprehensive land use program for the planning area along with development standards to guide future public and private actions relating not only to physical development, but also the conservation of open space and natural resources. This is the final document, which was approved by the City Council on October 12th, 2004.

Orcutt Area Specific Plan. The newest addition to the City (Annexed November 16, 2011) The Orcutt Area is located along the southwestern edge of the city limits of San Luis Obispo. The Orcutt Area encompasses 230 acres of land at the base of Righetti Hill. The specific plan outlines a conceptual pattern for how open space, trails, parks, and future housing development should occur in this expansion area.

Airport Area Specific Plan. The Airport Area includes 1,500 acres of land adjacent to the San Luis Obispo Regional Airport. This specific plan was adopted by the City Council in August 2005. The Specific Plan provides for areas of industrial development, business parks, open space and agriculture. The guidelines and standards contained in the specific plan are compatible with airport operations and are intended to complement the ongoing use and expansion of the regional airport.

Climate Action Plan (CAP). The City of San Luis Obispo adopted its Climate Action Plan by resolution in July 2012. The plan includes a complete streets program with several implementation strategies to implement the California Complete Streets Act of 2008.
4.15.2. Impact Analysis

This section describes the impact analysis of the project on transportation and circulation. The significance criteria follow the checklist as set forth in Appendix G to the State CEQA Guidelines. The methodologies used to determine the project impacts are described. Impacts on the transportation system are determined based upon the thresholds of significance, and mitigation measures are identified for those impacts considered to be significant.

a. Methodology and Significance Thresholds

Based on Appendix G of the State CEQA Guidelines, Section XVI, a significant transportation impact would occur if the implementation of the LUCE update would:

- Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit; Specifically,
  - 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;
  - Intersection (not downtown) operating at LOS D or better, but degrading to LOS E or F or
  - Intersection (downtown) operating at LOS E or better, but degrading to LOS F or
  - Intersection is currently deficient, and any increase in volume due to the project increases.
- 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 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;
- Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks;
- Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment);
  - Railroad: The City does not own or operation rail facilities. As such, operational (non-safety) impacts resulting from implementation of the LUCE update are not anticipated. For railroad operations, where the LUCE update implementation has the potential to result in interface with automobiles/bicycles/pedestrian traffic at at-grade crossings or where railroads share roadway space, impacts related to safety could be considered significant
- Result in inadequate emergency access; or
- Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.

However, it is important to note that the proposed LUCE update project would not directly result in a change to air traffic patterns. The EIR will then reference policies per the Airport Master Plan and the Airport Land Use Compatibility policies that would reduce any impacts to less than significant levels.
**Freeways.** Freeway segments are analyzed in terms of density, which is expressed as passenger cars per lane per mile. The level of service (LOS) classifications for density are:

- LOS A  \[\text{Density} \leq 11\]
- LOS B  \[\text{Density} > 11 \text{ and} \leq 18\]
- LOS C  \[\text{Density} > 18 \text{ and} \leq 26\]
- LOS D  \[\text{Density} > 26 \text{ and} \leq 35\]
- LOS E  \[\text{Density} > 35 \text{ and} \leq 45\]
- LOS F  \[\text{Density} > 45 \text{ (Demand exceeds capacity)}\]

**City Level of Service (LOS) Standards and Methodologies.** The traffic analysis was based on the concept of level of service (LOS). LOS is a qualitative measure of the effect of a number of factors, including speed and travel time, traffic interruptions, freedom to maneuver, driving comfort and convenience. LOS are designated A through F from best to worst, which cover the entire range of traffic operations that might occur. LOS A represents essentially free-flow conditions, and LOS F indicates substantial congestion and delay.

The City of San Luis Obispo uses an LOS D goal for roadway operating conditions outside of the “downtown” area as defined in the City’s Circulation Element of the General Plan. LOS E shall be the acceptable level of service in the downtown area as per the City’s Circulation Element. As shown in Table 4.15-1, for local and collector streets the operations are based on daily volume-based LOS grade.

- Signalized intersection analyses were conducted using the operational methodology outlined in the Highway Capacity Manual (Transportation Research Board, Washington D.C., 2000, Chapters 10 and 16). This procedure calculates an average stopped delay per vehicle at a signalized intersection, and assigns a level of service designation based upon the delay. The method also provides a calculation of the volume-to-capacity (v/c) ratio of the critical movements at the intersection. The description and level of service criteria are summarized in Table 4.15-4.
- Non-signalized All-Way Stop Controlled (AWSC) intersection analyses were conducted using the operational methodology outlined in the Highway Capacity Manual (Transportation Research Board, Washington D.C., 2000, Chapters 10 and 17). This procedure calculates an average stopped delay per vehicle at an intersection, and assigns a level of service designation based upon the delay. The description and level of service criteria are summarized in Table 4.15-5.
- Non-signalized Two-Way Stop Controlled (TWSC) intersection analyses were conducted using the operational methodology outlined in the Highway Capacity Manual (Transportation Research Board, Washington D.C., 2000, Chapters 10 and 17). This procedure calculates an average stopped delay per vehicle for each movement and assigns a level of service designation based upon the minor leg’s worst movement average delay. The description and level of service criteria are summarized in Table 4.15-5.

In accordance to the criteria specified in the San Luis Obispo Circulation Element Policy 6.2, the project has a significant impact on street segments when it causes segment volumes to exceed the maximum desired traffic volume thresholds or when traffic is added to those street segments that already are deficient under cumulative conditions.
### Table 4.15-4  Level of Service Criteria – Signalized Intersections

<table>
<thead>
<tr>
<th>Level of Service (LOS)</th>
<th>Average Delay (seconds/vehicle)</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>&lt; 10</td>
<td>LOS A represents free-flow travel with an excellent level of comfort and convenience and the freedom to maneuver.</td>
</tr>
<tr>
<td>B</td>
<td>&gt; 10 and &lt; 20</td>
<td>LOS B has stable operating conditions, but the presence of other road users causes a noticeable, though slight, reduction in comfort, convenience, and maneuvering freedom.</td>
</tr>
<tr>
<td>C</td>
<td>&gt; 20 and &lt; 35</td>
<td>LOS C has stable operating conditions, but the operation of individual users is substantially affected by the interaction with others in the traffic stream.</td>
</tr>
<tr>
<td>D</td>
<td>&gt; 35 and &lt; 55</td>
<td>LOS D represents high-density, but stable flow. Users experience severe restriction in speed and freedom to maneuver, with poor levels of comfort and convenience.</td>
</tr>
<tr>
<td>E</td>
<td>&gt; 55 and &lt; 80</td>
<td>LOS E represents operating conditions at or near capacity. Speeds are reduced to a low but relatively uniform value. Freedom to maneuver is difficult with users experiencing frustration and poor comfort and convenience. Unstable operation is frequent, and minor disturbances in traffic flow can cause breakdown conditions.</td>
</tr>
<tr>
<td>F</td>
<td>&gt; 80</td>
<td>LOS F is used to define forced or breakdown conditions. This condition exists wherever the volume of traffic exceeds the capacity of the roadway. Long queues can form behind these bottleneck points with queued traffic traveling in a stop-and-go fashion.</td>
</tr>
</tbody>
</table>


### Table 4.15-5  Level of Service Criteria – Unsignalized Intersections

<table>
<thead>
<tr>
<th>Level of Service (LOS)</th>
<th>Average Delay (seconds / vehicle)</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>&lt; 10</td>
<td>Little or no delay</td>
</tr>
<tr>
<td>B</td>
<td>&gt; 10 and &lt; 15</td>
<td>Short traffic delay</td>
</tr>
<tr>
<td>C</td>
<td>&gt; 15 and &lt; 25</td>
<td>Average traffic delays</td>
</tr>
<tr>
<td>D</td>
<td>&gt; 25 and &lt; 35</td>
<td>Long traffic delays</td>
</tr>
<tr>
<td>E</td>
<td>&gt; 35 and &lt; 50</td>
<td>Very long traffic delays</td>
</tr>
<tr>
<td>F</td>
<td>&gt; 50</td>
<td>Extreme delays potentially affecting other traffic movements in the intersection</td>
</tr>
</tbody>
</table>

Peak Hour Signal Warrant. Non-signalized intersections shown to trigger the peak hour (Warrant 3) CAMUTCD signal warrant are considered deficient in this analysis for discussion purposes. However, the decision to install a traffic signal should not be based solely upon a single warrant (the MUTCD and CA MUTCD define a total of nine signal warrants). Delay, congestion, driver confusion, future land use or other evidence for right of way assignment beyond that provided by stop controls must be demonstrated.

Warrant 3 addresses peak hour traffic volume levels above which it is presumed that the need for a traffic signal is warranted. Traffic signals tend to reduce the potential for right-angle type collisions but also tend to increase the potential for less severe rear-end collisions. Signal warrant peak hour volumes represent the threshold point at which the potential for more rear-end collisions is offset by the potential for fewer more severe right-angle collisions. Data needed to perform these warrant analyses were peak hour traffic counts collected or forecasted as part of this Circulation Element update.

Analysis Approach and Methodology. The City’s travel demand model (TDM) was based on data collected in San Luis Obispo through the 2001 California Statewide Household Travel Survey and the 2007 SLO Transit On-Board Survey, which included questions about the origins, destinations, purposes, lengths and modes of each trip made by a representative sample of households in San Luis Obispo. The model was then calibrated to represent these trip patterns and validated by checking its ability to replicate observed traffic counts on city streets as well as transit volumes. Once calibrated and validated, the model is expected to provide reasonable estimates of changes in traveler behavior in response to changes in land use and transportation infrastructure. Given the scale and size of the Proposed Project, the travel model was the best tool available for the current transportation planning and forecasting effort.

To account for anticipated traffic growth resulting from the Proposed Project as well as traffic growth outside the City (regional traffic growth), the 2035 Proposed Project traffic forecasts were developed by using the City’s travel demand model. The City’s model is a four-step travel demand model which includes: trip generation, gravity-based trip distribution, nested mode choice module including a transit network and a capacity constrained user equilibrium assignment. The model runs on the TransCAD software platform and includes a 2008 calibrated/validated baseline model and provides for a future 2035 out-year forecast.

Adjustments were performed to modify the City’s travel model “raw” output to be suitable for operational analysis. For segments, systematic modeling error was addressed by post-processing adjustments based on the NCHRP Report 255. NCHRP-255 adjustments entail applying model generated link-based growth estimates (computed variation between base year and forecast year model volumes) to baseline traffic counts to reflect future conditions. For each count location, traffic growth estimates were generated using both the Ratio and the Difference method, as well taking the average between the two methods.

For study intersections, a refinement process called the Furness Method was applied. This adjustment is based on the premise that travel models are calibrated to produce more accurate results for roadway segments than for individual turn movements. The Furness Method iteratively adjusts turning movement ground counts until the directional sum of the movements balance to the NCHRP-255 adjusted future link volumes. This factoring process produces forecast turn distributions that resemble the count distribution, but turn movement proportions will change in response to different growth rates on different legs as produced by the City’s travel demand model. The Furness Method is limited in its applicability to produce turn movement distributions at locations with new facilities or future improvements that change travel patterns. All turn movements were checked for balancing and adjusted as appropriate.

Future traffic signals were assumed to operate with the same timings as in the Existing condition. However, if shown to fail, intersection timings were optimized. In accordance with standard practice and per Caltrans guidelines, a 0.92 peak hour factor was applied to all intersections under the 2035 future year analysis.

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. In general, the Proposed Project provides for greater housing relative to the existing General Plan – particularly multi-family units. For non-
residential uses, less office, service and industrial growth is planned while greater growth in retail is planned under the Proposed Project relative to the existing General Plan. Future development is primarily focused in the same specific plan areas identified in the existing General Plan. These changes resulted in the following land use development changes relative to the existing General Plan for the City of San Luis Obispo.

<table>
<thead>
<tr>
<th>Land Use Change</th>
<th>Land Use Category</th>
<th>Units</th>
</tr>
</thead>
<tbody>
<tr>
<td>214</td>
<td>Single Family Housing</td>
<td>units</td>
</tr>
<tr>
<td>1,492</td>
<td>Multiple Family Housing</td>
<td>units</td>
</tr>
<tr>
<td>-922,459</td>
<td>Office</td>
<td>sq.ft</td>
</tr>
<tr>
<td>-7,875</td>
<td>Religious</td>
<td>sq.ft</td>
</tr>
<tr>
<td>-476,681</td>
<td>Service</td>
<td>sq.ft</td>
</tr>
<tr>
<td>99,411</td>
<td>Drive In Retail</td>
<td>sq.ft</td>
</tr>
<tr>
<td>172,717</td>
<td>High End Retail</td>
<td>sq.ft</td>
</tr>
<tr>
<td>350,350</td>
<td>Medium End Retail</td>
<td>sq.ft</td>
</tr>
<tr>
<td>-348,555</td>
<td>Low End Retail</td>
<td>sq.ft</td>
</tr>
<tr>
<td>-54</td>
<td>Elementary School</td>
<td>students</td>
</tr>
<tr>
<td>-3,943</td>
<td>Heavy Industry</td>
<td>sq.ft</td>
</tr>
<tr>
<td>-132</td>
<td>Light Industry</td>
<td>sq.ft</td>
</tr>
<tr>
<td>-157</td>
<td>Park and Recreation</td>
<td>sq.ft</td>
</tr>
<tr>
<td>-7</td>
<td>Agriculture</td>
<td>acres</td>
</tr>
<tr>
<td>-10</td>
<td>Undeveloped</td>
<td>acres</td>
</tr>
</tbody>
</table>

These proposed changes to the Land Use Element Development Special Planning Areas would generate traffic that would be distributed to the local and regional roadway network. Roadways and intersections immediately adjacent to the proposed development areas would experience the greater increase in volumes; however, overall travel on the city streets would increase. The proposed street network changes would result in changes in travel patterns through the city. Sensitivity testing was performed using the City’s travel demand model to gauge the degree of capacity improvements necessary to best accommodate the planned growth under the Proposed Project. Based on the results of the sensitivity analysis and considering other factors such as policy consistency, cost and feasibility, the following infrastructure improvements identified in the Proposed Project were coded into the 2035 model network. A description of this analysis is provided in Appendix N. These improvements are as follows:

- Prado Road Interchange with US 101
- Orcutt Overpass
- Broad Street Ramp closures
- Marsh/Higuera Convert 1-way to 2-way
- Madonna Road – Realignment
- Boysen and Santa Rosa – includes grade-separated crossing for bike/ped and turn restrictions
- New collector – Tank Farm to Buckley:
- Broad Street – Consolidate access
- Bishop Street Extension
- LOVR By-Pass
- Hwy 1/Hwy 101 Interchange Reconstruction (SPUI)
- Mission Plaza Expansion
- Chorro and Broad Street – Realignment
- Bianchi/Pismo/Higuera Realignment:
- Victoria Connection
- DT Transit Center Relocation

Consistent with CEQA case law and the Caltrans Guide for the Preparation of Traffic Impact Studies (December, 2002), the following two currently programmed roadway improvements with an identified funding source are also reflected as part of the future baseline: 1) Los Osos Valley Road and US 101 Interchange; and, 2) Prado Road Extension.

Proposed development projects and street network changes have the potential to result in significant impacts related to traffic and transportation. It is important to note that these projects have not been fully vetted through the advanced planning process and could be required to perform subsequent environmental review based on precise project designs that could determine additional levels of impact.
**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>Mode</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Drive Alone</td>
<td>60.21%</td>
</tr>
<tr>
<td>Carpool</td>
<td>30.49%</td>
</tr>
<tr>
<td>Transit</td>
<td>1.00%</td>
</tr>
<tr>
<td>Walk</td>
<td>4.15%</td>
</tr>
<tr>
<td>Bike</td>
<td>4.15%</td>
</tr>
</tbody>
</table>

These mode split percentages reflect a doubling of bicycle commute trips and tripling of non-commute bike trips over existing conditions in the travel demand model, supported by the provision of Class I bike paths within ¼ mile of nearly all City residents. The increased transit mode share would occur due to reductions in headways and increased service coverage.

**b. Project Impacts**

Based on the analysis approach described above, the impacts of the Proposed Project on state highway facilities (Tables 4.15-6 and 4.15-7), local roadways (Table 4.15-8), and intersections (Table 4.15-9) are summarized below. Intersection LOS worksheets are provided in Appendix L.

<table>
<thead>
<tr>
<th>Freeway Location</th>
<th>US-101 Proposed Project AM Peak-Hour LOS (Post Miles from South to North)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Northbound</td>
</tr>
<tr>
<td></td>
<td>Post Mile</td>
</tr>
<tr>
<td>Los Osos</td>
<td>25.911</td>
</tr>
<tr>
<td>Madonna</td>
<td>27.501</td>
</tr>
<tr>
<td>Rte. 227</td>
<td>28.088</td>
</tr>
<tr>
<td>Rte. 227</td>
<td>28.088</td>
</tr>
<tr>
<td>Rte. 1</td>
<td>29.067</td>
</tr>
<tr>
<td>Rte. 1</td>
<td>29.067</td>
</tr>
<tr>
<td>California</td>
<td>29.375</td>
</tr>
<tr>
<td>Grand</td>
<td>29.767³</td>
</tr>
<tr>
<td>Grand</td>
<td>29.767³</td>
</tr>
<tr>
<td>Buena V.</td>
<td>29.985</td>
</tr>
</tbody>
</table>

¹ Density expressed in pc/mi/ln, passenger cars per mile per lane
² Level of service is based on density as described in Basic Freeway Segment, Chapter 11, HCM 2010
³ Ahead or north of postmile
⁴ Back or south of postmile

*Source: Kittelson & Associates, Inc.*
### Table 4.15-7  US-101 Proposed Project PM Peak-Hour LOS (Post Miles from South to North)

<table>
<thead>
<tr>
<th>Freeway Location</th>
<th>Northbound</th>
<th>Southbound</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Post Mile</td>
<td>Volume</td>
</tr>
<tr>
<td>Los Osos</td>
<td>25.911</td>
<td>3,705</td>
</tr>
<tr>
<td>Madonna</td>
<td>27.501</td>
<td>3,420</td>
</tr>
<tr>
<td>Rte. 227</td>
<td>28.088</td>
<td>3,875</td>
</tr>
<tr>
<td>Rte. 227</td>
<td>28.088</td>
<td>3,635</td>
</tr>
<tr>
<td>Rte. 1</td>
<td>29.067</td>
<td>3,355</td>
</tr>
<tr>
<td>Rte. 1</td>
<td>29.067</td>
<td>3,685</td>
</tr>
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<td>California</td>
<td>29.375</td>
<td>3,275</td>
</tr>
<tr>
<td>Grand</td>
<td>29.767</td>
<td>3,205</td>
</tr>
<tr>
<td>Grand</td>
<td>29.767</td>
<td>3,090</td>
</tr>
<tr>
<td>Buena V.</td>
<td>29.985</td>
<td>3,400</td>
</tr>
</tbody>
</table>

¹ Density expressed in pc/mi/ln, passenger cars per mile per lane  
² Level of service is based on density as described in Basic Freeway Segment, Chapter 11, HCM 2010 

Source: Kittelson & Associates, Inc.

### Table 4.15-8  Cumulative Local Roadway LOS (Using FDOT Procedures)

<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>Cumulative AADT</th>
<th>LOS</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Augusta (Bishop – Laurel) W / Laurel</td>
<td>Collector</td>
<td>2</td>
<td>NO</td>
<td>YES</td>
<td>2,690</td>
<td>B</td>
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<tr>
<td>3</td>
<td>Broad (S / South)</td>
<td>Regional Route</td>
<td>4</td>
<td>YES</td>
<td>YES</td>
<td>33,690</td>
<td>F</td>
</tr>
<tr>
<td>4</td>
<td>Broad (Foothill – Lincoln)</td>
<td>Collector</td>
<td>2</td>
<td>NO</td>
<td>NO</td>
<td>4,800</td>
<td>C</td>
</tr>
<tr>
<td>5</td>
<td>Broad (Monterey - Marsh)</td>
<td>Collector</td>
<td>2</td>
<td>NO</td>
<td>NO</td>
<td>5,870</td>
<td>C</td>
</tr>
<tr>
<td>6</td>
<td>Broad (Marsh – Upham)</td>
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<td>2</td>
<td>NO</td>
<td>NO</td>
<td>11,265</td>
<td>D</td>
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<td>7</td>
<td>Broad (Upham – South)</td>
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<td>YES</td>
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<td>YES</td>
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<td>YES</td>
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<td>Regional Route - County</td>
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<td>YES</td>
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<td>NO</td>
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<td>YES</td>
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<td>20</td>
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<td>Capitolio (Broad – Sacramento) E / Broad</td>
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<td>YES</td>
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<td>Chorro (Highland – Foothill)</td>
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<td>NO</td>
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<td>Left Turn Lanes</td>
<td>Cumulative AADT</td>
<td>LOS</td>
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<td>Grand (Cal Poly – Mill)</td>
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<td>YES</td>
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<td>YES</td>
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<tr>
<td>44</td>
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<td>Arterial</td>
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<td>NO</td>
<td>YES</td>
<td>8,400</td>
<td>C</td>
</tr>
<tr>
<td>45</td>
<td>Industrial (Broad – Sacramento) E / Broad</td>
<td>Collector</td>
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<td>NO</td>
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<td>YES</td>
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<td>NO</td>
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<td>18,030</td>
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<tr>
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<td>Los Osos Valley (North City Limits – Prefumo Canyon)</td>
<td>Arterial</td>
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<td>YES</td>
<td>30,820</td>
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<td>54</td>
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<td>YES</td>
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<td>YES</td>
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<td>61</td>
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<td>YES</td>
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<tr>
<td>62</td>
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<td>3</td>
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<td>NO</td>
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<td>C</td>
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<td>65</td>
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<td>NO</td>
<td>NO</td>
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<td>Oceanaire (LOVR – Madonna) South Side</td>
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<td>NO</td>
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<td>71</td>
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<td>4</td>
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<td>YES</td>
<td>18,030</td>
<td>B</td>
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<tr>
<td>72</td>
<td>Orcutt (Laurel – Johnson)</td>
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<td>NO</td>
<td>NO</td>
<td>3,930</td>
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</tr>
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<td>73</td>
<td>Orcutt (Johnson – Tank Farm)</td>
<td>Arterial</td>
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<td>NO</td>
<td>NO</td>
<td>13,515</td>
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<td>74</td>
<td>Orcutt (S / City Limits)</td>
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</tr>
<tr>
<td>ID #</td>
<td>Location</td>
<td>Road Type</td>
<td>Lanes</td>
<td>Divided Roadway</td>
<td>Left Turn Lanes</td>
<td>Cumulative AADT</td>
<td>LOS</td>
</tr>
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<tr>
<td>75</td>
<td>Palm (Chorro – Santa Rosa) W / Osos</td>
<td>Collector</td>
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<td>NO</td>
<td>NO</td>
<td>4,195</td>
<td>C</td>
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<td>77</td>
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<td>NO</td>
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<td>NO</td>
<td>3,015</td>
<td>B</td>
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<tr>
<td>79</td>
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<td>NO</td>
<td>YES</td>
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<td>C</td>
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<tr>
<td>80</td>
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<td>NO</td>
<td>YES</td>
<td>36,230</td>
<td>F</td>
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<tr>
<td>81</td>
<td>Prado (Higuera – Broad Street)</td>
<td>Regional Route</td>
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<td>NO</td>
<td>YES</td>
<td>34,690</td>
<td>F</td>
</tr>
<tr>
<td>82</td>
<td>Prefumo (LOVR – CL) W / LOVR</td>
<td>Collector</td>
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<td>NO</td>
<td>YES</td>
<td>4,990</td>
<td>C</td>
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<tr>
<td>83</td>
<td>Ramona (Patricia – Broad) W / Broad</td>
<td>Collector</td>
<td>2</td>
<td>NO</td>
<td>NO</td>
<td>6,325</td>
<td>C</td>
</tr>
<tr>
<td>84</td>
<td>Sacramento (Orcutt – Industrial)</td>
<td>Collector</td>
<td>2</td>
<td>NO</td>
<td>NO</td>
<td>5,280</td>
<td>C</td>
</tr>
<tr>
<td>85</td>
<td>San Luis (California – Johnson)</td>
<td>Arterial</td>
<td>2</td>
<td>NO</td>
<td>YES</td>
<td>13,870</td>
<td>D</td>
</tr>
<tr>
<td>86</td>
<td>SR-1-Santa Rosa St (US-101 – Foothill)</td>
<td>Arterial - Caltrans</td>
<td>4</td>
<td>PARTIAL</td>
<td>YES</td>
<td>30,965</td>
<td>C</td>
</tr>
<tr>
<td>87</td>
<td>SR-1-Cabrillo Hwy (Foothill – Northern City Limit)</td>
<td>Arterial - Caltrans</td>
<td>4</td>
<td>YES</td>
<td>YES</td>
<td>27,390</td>
<td>B</td>
</tr>
</tbody>
</table>

*Source: Kittelson & Associates, Inc.*
### Table 4.15-9  2035 Intersection LOS Summary – LOS E/F

<table>
<thead>
<tr>
<th>Int. #</th>
<th>Intersection</th>
<th>Traffic Control</th>
<th>North-South</th>
<th>East-West</th>
<th>AM Peak Hour</th>
<th>PM Peak Hour</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>LOS Delay (seconds)</td>
<td>v/C Ratio</td>
</tr>
<tr>
<td>8</td>
<td>Grand Ave Slack St</td>
<td>AWSC</td>
<td>C</td>
<td></td>
<td>16.7</td>
<td>0.75</td>
</tr>
<tr>
<td>12</td>
<td>California Blvd Taft St</td>
<td>SSSC</td>
<td>F</td>
<td></td>
<td>111.8</td>
<td>1.15</td>
</tr>
<tr>
<td>13</td>
<td>Grand Ave Hwy 101 SB</td>
<td>SSSC</td>
<td>C</td>
<td></td>
<td>22.8</td>
<td>0.56</td>
</tr>
<tr>
<td>55</td>
<td>San Luis Dr California Blvd</td>
<td>AWSC</td>
<td>F</td>
<td></td>
<td>79.4</td>
<td>--</td>
</tr>
<tr>
<td>85</td>
<td>Higuera St Tank Farm Rd</td>
<td>Signal</td>
<td>E</td>
<td></td>
<td>66.7</td>
<td>1.03</td>
</tr>
<tr>
<td>89</td>
<td>Broad St High St</td>
<td>SSSC</td>
<td>F</td>
<td></td>
<td>--</td>
<td>73.03</td>
</tr>
<tr>
<td>94</td>
<td>Broad St Rockview Pl</td>
<td>SSSC</td>
<td>E</td>
<td></td>
<td>39.4</td>
<td>0.71</td>
</tr>
<tr>
<td>95</td>
<td>Broad St Capitolio Way</td>
<td>SSSC</td>
<td>E</td>
<td></td>
<td>39.4</td>
<td>0.70</td>
</tr>
<tr>
<td>96</td>
<td>Johnson Ave Orcutt Rd</td>
<td>AWSC</td>
<td>E</td>
<td></td>
<td>40</td>
<td>--</td>
</tr>
<tr>
<td>98</td>
<td>Broad St Tank Farm Rd</td>
<td>Signal</td>
<td>E</td>
<td></td>
<td>56.3</td>
<td>0.98</td>
</tr>
<tr>
<td>102</td>
<td>Broad St Airport Way</td>
<td>SSSC</td>
<td>E</td>
<td></td>
<td>36.8</td>
<td>0.68</td>
</tr>
</tbody>
</table>

1. **Traffic control:** Signal = Signalized; SSSC = Side-street stop-controlled; AWSC = All-way stop-controlled
2. **v/C** = Volume to capacity

*Source: Kittelson & Associates, Inc.*
c. Project Impacts

Impact CIR-1

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). Impact is considered to be Class I, significant and unavoidable.

Future implementation of the proposed development area projects and street network changes would have the potential to result in significant impacts related to roadway operations. As shown in Table 4.15-6, 8 roadway segments would experience significant impacts due to increases in volumes.

**Broad (S/South, South – Orcutt, Orcutt – Tank Farm Road and Buckley – South City Limit).** Due to changes in local and regional land uses and traffic patterns, these segments would experience significant increases in volume.

**Chorro (Foothill – Lincoln).** Due to changes in traffic patterns, this segment will experience a significant increase in volume.

**Los Osos Valley Road (just west of the City Limits).** Due to land use changes in the vicinity of the interchange and changes in traffic patterns, these segments will experience significant increases in volume.

**Prado (US 101 – Higuera and Higuera – Broad).** Due to the construction of the interchange at US 101/Prado Road, these segments will experience significant increases in volume.

While the potential addition of traffic related to implementation of the above development area projects and street network changes would be considered significant, the incorporation of the LUCE Update policies and existing City policies discussed below could reduce volumes. However, further reduction of volumes would be necessary to reduce impacts to less than significant levels.

**Applicable LUCE Update Policies**

The General Plan Circulation Element Update includes goals, policies and programs, including those listed below, to address the potential impacts related to increased traffic volumes on local roadways.

**2.0.1 Multi-level Programs**

The City shall support county-wide and community-based efforts aimed at substantially reducing the number of vehicle trips and parking demand.

**2.0.2 Flexible Work Schedules**

The City shall support flex time programs and alternative work schedules to reduce peak hour traffic demand.

**2.0.3 Work-based Trip Reduction**

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.

**2.0.4 Downtown Congestion**

Within the Downtown the City shall establish and promote programs aimed at reducing congestion in a way that supports the long-term economic viability of the downtown.
2.0.5 Long-term Measure
The City shall support programs that reduce traffic congestion and maintain air quality. If air quality degrades below legal standards or level of service (LOS) standards are exceeded, the City will pursue more stringent measures to achieve its transportation goals.

6.0.A Complete Streets
The City shall design and operate city streets to enable safe, comfortable, and convenient access and travel for users of all abilities including pedestrians, bicyclists, transit users, and motorists.

6.0.B Multimodal Level of Service (LOS) Objectives, Service Standards, & 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 6.0.1 and the Highway Capacity manual.

<table>
<thead>
<tr>
<th>Table 6.0.1 Multimodal Level of Service (LOS) Objectives</th>
</tr>
</thead>
<tbody>
<tr>
<td>Travel Mode</td>
</tr>
<tr>
<td>Bicycle</td>
</tr>
<tr>
<td>Pedestrian</td>
</tr>
<tr>
<td>Transit</td>
</tr>
<tr>
<td>Vehicle</td>
</tr>
</tbody>
</table>

Notes:
(1) Bicycle LOS objectives & standards only apply to routes identified in the City’s adopted Bicycle Transportation Plan.
(2) Exceptions to minimum pedestrian LOS objectives & standards may apply when it determined that sidewalks are not consistent with neighborhood character including topography, street design and existing density.
(3) Transit LOS objectives & standards only apply to routes identified in the City’s Short Range Transit Plan.

6.0.C Multimodal Priorities
In addition to maintaining minimum levels of service, Multimodal service levels should be prioritized in accordance with the established modal priorities designated in Table 6.0.2, such that construction, expansion, or alteration for one mode should not degrade the service level of a higher priority mode.

<table>
<thead>
<tr>
<th>Table 6.0.2 Multimodal Priorities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Complete Streets Areas</td>
</tr>
<tr>
<td>Downtown &amp; Upper Monterey Street</td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td>Commercial Corridors &amp; Areas</td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td>Regional Arterial and Highway Corridors</td>
</tr>
<tr>
<td></td>
</tr>
</tbody>
</table>

Notes:
Exceptions to multimodal priorities may apply when in conflict with safety or regulatory requirements or conflicts with area character, topography, street design, and existing density.
6.0.D  Defining Significant Circulation Impact
Any degradation of the level of service shall be minimized to the extent feasible in accordance with the modal priorities established in Policy 6.0.C. If the level of service degrades below thresholds established in policy 6.0.B, it shall be determined a significant impact for purposes of environmental review under the California Environmental Quality Act (CEQA). For roadways already operating below the established MMLOS standards, any further degradation to the MMLOS score will be considered a significant impact under CEQA.

Where a potential impact is identified, the City in accordance with the modal priorities established in Policy 6.0.C, can determine if the modal impact in question is adequately served through other means e.g., another parallel facility or like service. Based on this determination, a finding of no significant impact may be determined by the City.

6.0.E  Mitigation
For significant impacts, developments shall be responsible for their fair share of any improvements required. Potential improvements for alternative mode may include, but are not limited to:

a.  Pedestrian: Provision of sidewalk, providing or increasing a buffer from vehicular travel lanes, increased sidewalk clear width, providing a continuous barrier between pedestrians and vehicle traffic, improved crossings, reduced signal delay, traffic calming, no right turn on red, reducing intersection crossing distance.

b.  Bicycle: Addition of a bicycle lane, traffic calming, provision of a buffer between bicycle and vehicle traffic, pavement resurfacing, reduced number of access points, or provision of an exclusive bicycle path, reducing intersection crossing distance.

c.  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, or exclusive transit lanes.

6.0.F  City Review
When new projects impact the existing circulation system, the City shall review the effectiveness and desirability of "direct fix" mitigation improvements to address MMLOS impacts. Where a significant impact is found, alternative system-wide project mitigations may be submitted for consideration to the City in accordance with the modal priorities established in Policy 6.0.C. Exceptions shall be based on the physical conditions of the right-of-way to support additional improvements. If the right-of-way in question cannot address on-site mitigation, appropriate off-site improvements that have direct nexus to and effectively address the specific impacts created by the project may be considered.

7.0.3  Growth Management & Roadway Expansion
The City shall manage the expansion of roadways to keep pace with only the level of increased vehicular traffic associated with development planned for in the Land Use Element and under the City’s growth management policies and regional transportation plans.

7.0.4  Transportation Funding
In order to increase support for non-automobile travel, the City shall strive to allocate transportation funding across various modes approximately proportional to the modal split objectives for 2035 as shown in Figure1.

7.0.5  Vehicle Speeds
To the extent permitted under the CVC, the City shall endeavor to maintain and reduce speeds where possible in residential neighborhoods.
7.1.7 Traffic Access Management [Program]
The City shall adopt an access management policy to control location, spacing, design and operation of driveways, median openings, crosswalks, interchanges and street connections to a particular roadway in a manner that preserves the safety and efficiency of the transportation system.

In addition to implementation of these policies, the LUCE Update includes policies that support and encourage use of alternative modes, which would result in a shift in mode of travel, and reduction in the traffic volumes on city streets. See the discussion under Impact CIR-7 for the full text of the policies listed above for biking and walking.

Applicable Existing City Policies

The existing General Plan Circulation Element (2006) lists policies aimed to reduce impacts from increased traffic volumes on local streets. These include:

7.0.1 Peak Hour and Daily Traffic
The City shall cooperate with County and State government to institute programs that reduce the levels of peak-hour and daily vehicle traffic.

7.0.2 Street Network
The City shall manage to the extent feasible the street network so that the standards presented in Table 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.

Mitigation Measures

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. As such, with the incorporation of the Proposed Project and adherence to proposed and existing City policies and programs discussed above, existing and proposed City policies that contribute to reducing volumes along roadways would partially mitigate this impact. However, the impact would remain significant and unavoidable.

Significance After Mitigation

Implementation of proposed and existing policies would not fully mitigate the impact, so the impact would remain potentially significant and unavoidable.

Impact CIR-2

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 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.

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 4.15-7, a total of 11 intersections would operate at unacceptable conditions during the AM and/or PM peak hours.

Grand & Slack (#8). Due to increases in traffic on Grand Boulevard, SB through vehicles and vehicles attempting to make an EB left-turn from Slack Street experience significant delay.

California & Taft (#12). Due to increases in traffic on California Boulevard, vehicles attempting to make a WB left-turn from Taft Street experience significant delay.
4.0 Environmental Impact Analysis

Grand & US 101 SB on-ramp/Loomis (#13). Due to increases in traffic on Grand Avenue, WB vehicles on Loomis Street experience significant delay when attempting to turn onto Grand Avenue or cross to the on-ramp.

San Luis & California (#55). Due to changes in land use in the general vicinity of this intersection, traffic increases such that the EB left-turn and NB left-turn movements experience significant delay.

Higuera & Tank Farm (#85). Due to increases in traffic along Higuera Street and Tank Farm Road, the SB left-turn movement experiences significant delay.

Broad & High (#89). Due to increases in traffic along Broad Street, vehicles on High Street experience significant delay at this intersection.

Broad & Rockview (#94). Due to increases in traffic along Broad Street, EB vehicles on Rockview Place experience significant delay.

Broad & Capitolio (#95). Due to increases in traffic along Broad Street, WB vehicles on Capitolio Way experience significant delay.

Johnson & Orcutt (#96). Due to increases in traffic along Johnson Avenue and Orcutt Road, EBL vehicles experience significant delay.

Broad & Tank Farm (#98). Due to increases in traffic on both streets, all approaches experience significant delay.

Broad & Airport (#102). Due to increases in traffic along Broad Street, the EBL movement experiences significant delay.

The potential addition of traffic related to implementation of the above development area projects and street network changes would be considered significant; however, incorporation of the LUCE Update policies and existing City policies discussed below would reduce impacts to less than significant levels.

Applicable LUCE Update Policies

The General Plan Circulation Element Update includes goals, policies and programs to address impacts related to increased traffic volumes on local roadways. Please refer to the policy discussion under Impact CIR-1 for the full text of the policies.

Mitigation Measures

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 land use or other evidence for right of way assignment beyond that provided by stop controls must be demonstrated. The City will adhere to Caltrans’ process for intersection control evaluation.

CIR-2.a Grand & Slack (#8)
- Install increased traffic control (traffic signal or roundabout).

CIR-2.b California & Taft (#12)
- Install increased traffic control (traffic signal or roundabout).

CIR-2.b Grand & US 101 SB on-ramp (#13)
- Install dedicated WB right-turn lane.

CIR-2.c San Luis & California (#55)
- Install increased traffic control (traffic signal or roundabout).
CIR-2.j Higuera & Tank Farm (#85)
- Add NB right-turn lane, WB dual right-turn lanes, two-way left-turn lane on Tank Farm between Higuera and Long.

CIR-2.l Broad & High (#89)
- Install increased traffic control (traffic signal or roundabout).
- Augment bicycle facilities and improve transit headways on Broad Street.

CIR-2.n Broad & Rockview (#94)
- Install downstream signal at Broad & Capitolio.
- Augment bicycle facilities and improve transit headways on Broad Street.

CIR-2.o Broad & Capitolio (#95)
- Install increased traffic control (traffic signal or roundabout).
- Augment bicycle facilities and improve transit headways on Broad Street.

CIR-2.p Johnson & Orcutt (#96)
- Install roundabout.

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.

CIR-2.s Broad & Airport (#102)
- Install TWLTL north of intersection.
- Augment Bicycle facilities and improve transit headways on Broad Street.

All mitigated LOS worksheets are provided in Appendix L.

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. As such, with the incorporation of the Proposed Project and adherence to proposed and existing City policies and programs discussed above, additional mitigation is not required.

Significance After Mitigation

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. However, many of the proposed mitigations are infeasible due to right-of-way or funding constraints. Therefore, the impact remains significant and unavoidable.

Impact CIR-3

Development under the LUCE Update will increase traffic on freeway facilities. Impact is considered to be Class I, significant and unavoidable.

Future implementation of the Proposed Project i.e., development projects and street network changes would have the potential to result in significant impacts on freeway facilities, as shown in Tables 4.15-4 and 4.15-5.

Based on an analysis of all US 101 freeway segments through the City of San Luis Obispo (post mile 25.911 to 29.985), one segment north of Madonna Road (post mile 28.088) is projected to experience unstable flow conditions (LOS F) in northbound direction during the AM peak hour. All other segments are projected to operate at LOS D or better during the AM peak hour in 2035. During the PM peak hour in the southbound direction, all US 101 segments (4.074 centerline miles
of freeway) are projected to experience unstable flow conditions (LOS F). All segments in the northbound direction are projected to operate at LOS D.

The comparison of 2035 Proposed Project to existing conditions is problematic. Given that traffic growth on US 101 in the incorporated area of San Luis Obispo is the result of growth within the City, but also traffic growth from the unincorporated areas, the other incorporated cities of San Luis Obispo County and interregional travel, comparing the Proposed Project’s 2035 traffic growth on US 101 to the existing condition would not effectively isolate the impacts of the proposed plan over the 20-year planning horizon. It would be more meaningful to test the significance of freeway impacts by comparing the Proposed Project to a future baseline condition. Differences observed between the Proposed Project and such a future baseline scenario would provide a more meaningful comparative analysis framework for purposes of CEQA. It should also be noted that the City of San Luis Obispo’s land use growth assumptions for areas outside the City used for modeling future traffic were developed based on pre-recession characteristics and land use development growth rates. The SLOCOG regional travel model, for instance, projects significantly lower AM/PM peak hour volumes on US 101 for 2035 relative to the forecasts generated by the City’s 2035 travel model. Nevertheless, for CEQA purposes, the impact on freeway facilities will be based on the City’s traffic projections that assume implementation of the Proposed Project relative to existing conditions.

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.

**Applicable LUCE Update Policies**

The General Plan Circulation Element Update includes goals, policies and programs to address impacts related to increased traffic volumes on local roadways. Please refer to the policy discussion under Impact CIR-1 for the full text of the policies.

**Mitigation Measures**

The following mitigation measures would be required for the US 101 freeway segments to meet the LOS standard.

Widen US 101 from 4- to 6-lanes from post mile 25.911 to 29.985 would effectively mitigate this impact. However, given that 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, and that the City of San Luis Obispo, as the lead agency, has no jurisdiction over this improvement, and that the impact would arise under future cumulative conditions, and there is no feasible mitigation measures 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 considered significant and unavoidable.

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 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.
Adoption of the LUCE Update has the potential to increase traffic volumes and speeds in neighborhoods.

**Applicable LUCE Update Policies**

The General Plan Circulation Element Update includes the following policies and programs to address neighborhood traffic:

8.0.1 **Through Traffic**

The City shall design its circulation network to encourage through traffic to use Regional Routes, Highways, Arterials, Parkway Arterials, and Residential Arterial streets and to discourage through traffic use of Collectors and Local streets.

8.0.3 **Neighborhood Traffic Speeds**

To the extent permitted under the California Vehicle Code, the City shall endeavor to reduce and maintain vehicular speeds in residential neighborhoods.

8.0.4 **Neighborhood Traffic Management**

The City should ensure that neighborhood traffic management projects:

- Provide for the mitigation of adverse impacts on all residential neighborhoods.
- Allow for adequate response conditions for emergency vehicles.
- Provide for convenient and safe through bicycle and pedestrian traffic.

8.0.5 **Neighborhood Traffic Management Guidelines**

The City shall update its Neighborhood Traffic Management Guidelines to address voting, funding, and implementation procedures.

8.0.6 **Non-Infill Development**

In new, non-infill developments, dwellings shall be set back from Regional Routes and Highways, Parkway Arterials, Arterials, Residential Arterials, and Collector streets so that interior and exterior noise standards can be met without the use of noise walls.

8.0.7 **Development**

The City shall not approve development which significantly worsens already deficient residential neighborhood traffic conditions except as provided under CEQA. New development shall incorporate traffic calming features to minimize speeding and cut-through traffic.

**Applicable Existing City Policies**

In addition, the existing General Plan Circulation Element (2006) lists goals, policies and programs aimed to protect neighborhoods from increased traffic.

8.0.2 **Residential Streets**

The City should not approve commercial development that encourages customers, employees or deliveries to use Residential Local or Residential Collector streets.
Mitigation Measures

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.

**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.

Adoption of the LUCE Update may encourage increased truck traffic on non-designated truck routes.

**Applicable LUCE Update Policies**

The General Plan Circulation Element Update includes the following policies and programs to address increased truck traffic:

**10.0.1 Truck Routes**

The City shall require STA-sized and CA legal trucks to use the City's truck routes as designated in Figure 5.

Mitigation Measures

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.

**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.

Adoption of the LUCE Update may lead to changes in traffic volumes of traffic patterns that result in deteriorated safety conditions.

**Applicable LUCE Update Policies**

The General Plan Circulation Element Update includes the following policies and programs to address safety:

**11.0.1 Interstate Air Service**

The City shall support and encourage expansion of air transportation services.

**11.0.2 County Aircraft Operations**

The City shall work with the County to continue to address aircraft operations so that noise and safety problems are not created in developed areas or areas targeted for future development by the City’s Land Use Element.

**11.0.3 Public Transit Service**

The City shall encourage improved public transit service to the County airport as soon as practical.

Mitigation Measures

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.
Adoption of the LUCE Update will not impose new barriers on bicycle and pedestrian traffic within the City of San Luis Obispo, nor will in conflict with existing policies that are supportive of it. The LUCE Update provides additional policy support which further encourages the use of active transportation modes within the City. Therefore the impact is not significant.

Applicable LUCE Update Policies

The General Plan Circulation Element Update includes the following policies and programs to support active transportation.

4.0.1 Bicycle Use
The City shall expand the bicycle network and provide end-of-trip facilities to encourage bicycle use and to make bicycling safe, convenient and enjoyable.

4.0.2 Campus and School Site Trips
The City shall encourage the use of bicycles by students and staff traveling to local educational facilities.

4.0.3 Continuous Network
The City shall collaborate with SLO County to coordinate planning and development of county bikeways to support a regional bike network and identify and acquire additional rights of way in the City as they become available.

4.0.4 New Development
The City shall require that new development provide bikeways, secure bicycle storage, parking facilities and showers consistent with City plans and development standards. When evaluating transportation impacts, the City shall use a Multimodal Level of Service analysis.

4.0.5 Bikeway Design and Maintenance
The City shall design and maintain bikeways to make bicycling safe, convenient and enjoyable.

4.0.6 Bikeway Development with Road Improvements
The City shall construct bikeways facilities as designated in the Bicycle Transportation Plan when:
- The street section is repaved, restriped, or changes are made to its cross-sectional design; or
- The street section is being changed as part of a development project.

4.0.7 Education and Safety
The City shall support education and safety programs aimed at all youth, adult cyclists and motorists.

4.0.8 Bicycle Transportation Coordinator
The City shall support the allocation of staff and resources to coordinate and implement the bicycle transportation plan policies and programs.

4.0.9 Traffic Law Compliance
The City shall continue to seek compliance with its traffic laws through enforcement and education.
4.0.10 Right-of-way Acquisition
The City shall identify and pursue the acquisition of right-of-ways needed to implement the projects identified in the City’s Bicycle Transportation Plan.

4.0.11 Bicycle Transportation Plan Implementation
The City shall support allocation of staff and resources to coordinate and implement bicycle transportation policies and programs.

4.0.12 Bike Parking
The City shall facilitate development of conveniently located bike parking so as not to impede pedestrian walkways.

5.0.1 Promote Walking
The City shall encourage and promote walking as a regular means of transportation.

5.0.2 Sidewalks and Paths
The City should complete a continuous pedestrian network connecting residential areas with major activity centers as well as trails leading into city and county open spaces.

5.0.4 Pedestrian Access
New or renovated commercial and government public buildings shall provide convenient pedestrian access from nearby sidewalks and pedestrian paths, separate from driveways and vehicle entrances.

5.0.5 Pedestrian Crossings
To improve pedestrian crossing safety at heavily used intersections, the City shall institute the following:
   i. Install crossing controls where warranted by the California Manual on Uniform Traffic Control Devices (MUTCD) that provide adequate time for pedestrians to cross the street.
   ii. In the downtown, install traffic-calming features such as textured cross walks and bulb-outs, where appropriate.
   iii. On Arterial Streets, Parkways or Regional Routes with four or more travel lanes, install medians at pedestrian crossings where roadway width allows.

5.0.6 Downtown
The City shall require that pedestrian facilities in the downtown be designed in accordance with the Downtown Pedestrian Plan design guidelines to allow a clear path of travel and include conveniently located rest areas with shade and seating.

5.0.7 Sidewalks
As allowed by the American with Disabilities Act, the City shall consider neighborhood character including topography, street design, existing density and connectivity when identifying and prioritizing the installation of sidewalks.

Applicable Existing City Policies
The existing General Plan Circulation Element (2006) lists additional policies aimed to encourage active transportation modes, particularly walking include:

5.0.3 New Development. New development shall provide sidewalks and pedestrian paths consistent with City policies, plans, programs and standards.
Mitigation Measures

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.

<table>
<thead>
<tr>
<th>Impact CIR-8</th>
</tr>
</thead>
<tbody>
<tr>
<td>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.</td>
</tr>
</tbody>
</table>

Adoption of the LUCE Update encourages increased use of transit and provides policies that will enhance city provided transit services that will better connect with other transportation modes. Therefore the impact is not significant.

Applicable LUCE Update Policies

The General Plan Circulation Element Update includes the following policies and programs to support increased transit ridership:

3.0.1 Transit Development

The City shall encourage transit development, expansion, coordination and marketing throughout San Luis Obispo County to serve a broad range of local and regional transportation needs.

3.0.2 City Bus Service

The City shall improve and expand city bus service to make the system more convenient and accessible for everyone. Transit services owned and operated by the City shall endeavor to maintain and improve all system-side transit standards identified in the City’s Short Range Transit Plan.

3.0.3 Paratransit Service

The City shall continue to support paratransit service for the elderly and disabled persons provided by public and private transportation providers.

3.0.4 Campus Service

The City shall continue to work with Cal Poly to maintain and expand the "free fare subsidy program" for campus affiliates. The City shall work with Cuesta College and other schools to establish similar programs.

3.0.5 Unmet Transit Needs

The City shall work with SLOCOG to identify and address Unmet Transit Needs.

3.0.6 Service Standards

The City shall implement the following service standards for its transit system and for development that is proximate to the transit network:

A. Routes, schedules and transfer procedures of the City and regional transit systems should be coordinated to encourage use of buses.

B. In existing developed areas, transit routes should be located within 1/4 mile of existing businesses or dwellings.

C. In City expansion areas, employment-intensive uses or medium, medium-high or high density residential uses should be located within 1/8 mile of a transit route.

D. The spacing of stops should balance patron convenience and speed of operation.
Applicable Existing City Policies

In addition, the existing General Plan Circulation Element (2006) lists goals, policies and programs aimed to improve transit access and mode share, particularly for key trips.

3.0.7 Transit Service Access. New development should be designed to facilitate access to transit service.

Mitigation Measures

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.

4.15.3. Cumulative Impacts

Cumulative buildout of the proposed LUCE Update includes buildout of areas within existing city boundaries, as well as buildout of the identified expansion areas and within the sphere of influence. The increased development results in increased traffic, biking, walking, and transit usage throughout the city. By its nature, the LUCE Update considers cumulative development within the city and potential expansion areas. Thus, cumulative impacts are generally equivalent to project-specific impacts described above.
Please see the next page.
This section describes the water, wastewater and solid waste systems that serve the City of San Luis Obispo and describes how the proposed LUCE Update would impact the continued provision of those services.

4.16.1. Setting

Existing water and wastewater utility service characteristics in the City of San Luis Obispo are described in detail in San Luis Obispo General Plan Update Background Report Sections 5.1, Water, and 5.3 Wastewater. Existing solid waste collection and disposal information is provided in Background Report Section 5.5, Public Services and Utilities. Please refer to the Background Report, which is hereby incorporated by reference, for additional details related water, wastewater and solid waste utilities in the city.

a. Water

The City of San Luis Obispo Utilities Department provides potable and recycled water to the community and is responsible for water supply, treatment, distribution, and resource planning. The City is the sole water provider within the city limits and most of the City’s water is supplied from multiple surface water sources. However, the City also uses groundwater to supplement surface water supplies and recycled water is used to supplement irrigation demand. Recycled water may also be used for all approved uses consistent with the City’s Master Permit and Title 22.

Surface Water Supply: The Water and Wastewater Element of the General Plan, first adopted in 1987 and most recently updated in 2010, specifies that the City shall utilize multiple water resources to meet its water supply needs. Having several sources of water avoids dependence on any one source that may not be available during a drought or other water supply reduction or emergency. With the update of the Water and Wastewater Element 2010, the City Council reaffirmed the policy for a multi-source water supply. Consistent with the multi-source water supply concept, the City obtains water from five sources:

- Salinas Reservoir (Santa Margarita Lake) and Whale Rock Reservoir: Combined Safe Annual Yield 6,940 AF/year
- Nacimiento Reservoir: 3,380 AF/year dependable yield/contractual limit
- Recycled water from the City’s Water Resource Recovery Facility (WRRF): 165 AF/year

Groundwater resources resulted in a 100 acre-foot supplemental domestic water supply for the City in 2011. However, due to limitations for the use of the groundwater resources, and consistent with Policy A 3.2.3 from the City’s 2010 Water and Wastewater Management Element of the General Plan and Table 16 in Section 4 of the Urban Water Management Plan, the City will continue to use groundwater for domestic purposes when available, but will not consider this source of supply as part of its water resource planning or water supply availability.

The Salinas Reservoir (Santa Margarita Lake) captures water from a 112-square mile watershed and can store up to 23,843 acre feet. Since the late 1940s, the San Luis Obispo County Flood Control and Water Conservation District has operated this water supply for the city under a lease from the U.S. Army Corps of Engineers. Water from the reservoir is pumped through the Cuesta Tunnel, which is a one-mile long tunnel through the mountains of the Cuesta Ridge, and then flows by gravity to the city’s Water Treatment Plant on Stenner Creek Road.

The Whale Rock Reservoir is a 40,662 acre-foot reservoir created by the construction of an earthen dam on Old Creek near the town of Cayucos. The Whale Rock Dam captures water from a 20.3 square mile watershed and water is
delivered through 17.6 miles of 30-inch pipeline and by two pumping stations. The City of San Luis Obispo owns 55.05 percent of the water storage rights at the reservoir. The remaining water storage rights are divided between the two State agencies with Cal Poly owning 33.71 percent and the California Men’s Colony owning 11.24 percent.

The Nacimiento Reservoir provides flood protection and is a source of supply for groundwater recharge for the Salinas Valley. It is owned and operated by the Monterey County Water Resources Agency. Since 1959, the San Luis Obispo County Flood Control and Water Conservation District has had an entitlement to 17,500 acre feet per year of water from the reservoir for use in San Luis Obispo County. Approximately 1,750 acre feet per year have been designated for uses around the lake, leaving 15,750 AF/year for allocation to other areas within the County of San Luis Obispo.

A summary of the surface water resources available to the city are summarized in Table 4.16-1.

Table 4.16-1  Surface Water Resources

<table>
<thead>
<tr>
<th>Water Resource</th>
<th>2012 Annual Availability</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Salinas &amp; Whale Rock Reservoirs</td>
<td>6,940 AF</td>
<td>Safe Annual Yield (A)</td>
</tr>
<tr>
<td>Nacimiento Reservoir</td>
<td>3,380 AF</td>
<td>Dependable Yield (B)</td>
</tr>
<tr>
<td>Recycled Water</td>
<td>165 AF</td>
<td>2011 Annual Usage (C)</td>
</tr>
<tr>
<td>Siltation from 2010 to 2060</td>
<td>(500 AF)</td>
<td>WWE Policy A 4.2.2 (D)</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>9,985 AF</strong></td>
<td></td>
</tr>
</tbody>
</table>

A. **Quantity of water which can be withdrawn every year while operating both reservoirs in coordinated operations under critical drought conditions** (Water and Wastewater Element Policy A 4.2.1).
B. **Dependable Yield is the contractual amount of water the City has rights to from Nacimiento Reservoir.**
C. **The quantity of recycled water included is the actual prior year’s recycled water usage (2012) per WEME Policy A 7.2.2.**
D. **Reservoir siltation is a natural occurrence that reduces storage capacity over long periods, resulting in the reduction of safe annual yield.**

Source: 2013 Water Resources Status Report

**Recycled Water Supply:** Water recycling was envisioned as part of the City’s overall water supply strategy since the 1980s. In 1994, the City completed a major capital improvement project at the Water Reclamation Facility that included addition of tertiary treatment and other unit processes required to meet stringent effluent quality limits intended to protect and enhance the receiving waters of San Luis Obispo Creek. While a municipal water reuse program was envisioned at the time of this upgrade, the City did not receive regulatory approvals for diversion of treated effluent for off-site landscape irrigation and other approved uses until 2002.

The City’s 2004 Water Reuse Master Plan identifies the areas of the city to be served with recycled water, as well as potential customers and anticipated future recycled water demands. The City completed construction of the Water Reuse Project in 2006 and recycled water deliveries began in October 2006 delivering a total of 7.69 acre-feet (AF) of water. In 2013, recycled water was delivered to 29 sites with total usage over 176 AF per year. A summary of recycled water usage over the past several years is provided in Table 4.16-2.

Table 4.16-2 Annual Recycled Water Usage Inventory

<table>
<thead>
<tr>
<th>Calendar Year</th>
<th>Annual Recycled Water Usage (AF)</th>
<th>Number of Sites Using Recycled Water</th>
</tr>
</thead>
<tbody>
<tr>
<td>2006</td>
<td>7.69</td>
<td>1</td>
</tr>
<tr>
<td>2007</td>
<td>77.17</td>
<td>10</td>
</tr>
<tr>
<td>2008</td>
<td>89.95</td>
<td>11</td>
</tr>
<tr>
<td>2009</td>
<td>138.07</td>
<td>17</td>
</tr>
<tr>
<td>2010</td>
<td>152.63</td>
<td>22</td>
</tr>
<tr>
<td>2011</td>
<td>157.65</td>
<td>25</td>
</tr>
<tr>
<td>2012</td>
<td>166.71</td>
<td>26</td>
</tr>
<tr>
<td>2013</td>
<td>176.82</td>
<td>29</td>
</tr>
</tbody>
</table>

Source: City of San Luis Obispo Water and Wastewater Element, 2010; Metz, Jennifer, City of San Luis Obispo Utilities Department, 2014
**Groundwater Supply:** The principal source of groundwater for the city is the San Luis Obispo Groundwater Basin, and the majority of groundwater use from the basin is for agricultural purposes and private property uses. The basin is relatively small and recharges very quickly following normal rainfall years. In 2011, the City relied on groundwater to supply approximately two percent of the city’s annual water demand.

**Water Demand:** Water use in the city includes single-family, multi-family, commercial (including institutional and industrial), and irrigation customers. No agricultural uses are supplied by City water and the City does not sell water to other agencies. The City does not have additional water demands such as water use for saline barriers, groundwater recharge, etc. In 2011, the total water demand for the city was 5,285 AF, and total demand in 2012 was 5,541 AF. The total water demand for the city in 2005 was 6,098 AF. Even with an increase in population, a decrease in water demand is consistent with nationwide trends, due in part to conservation success and recent recessionary impacts (vacancy rates, etc.).

**Per Capita Water Demand:** The total per capita water demand for the city between 2003 and 2012 are summarized in Table 4.16-3. The per capita use rate is not the amount that the average person uses but takes into account all water uses including residential, commercial, industrial, and landscape. The ten year annual daily per capita water use in the city is 119 gallons per day.

<table>
<thead>
<tr>
<th>Year</th>
<th>Population</th>
<th>Total Annual Water Use (acre feet)</th>
<th>Annual Daily Per Capita Water Use (gpcd)</th>
</tr>
</thead>
<tbody>
<tr>
<td>2003</td>
<td>44,357</td>
<td>5,968</td>
<td>120</td>
</tr>
<tr>
<td>2004</td>
<td>44,298</td>
<td>6,239</td>
<td>126</td>
</tr>
<tr>
<td>2005</td>
<td>44,687</td>
<td>6,098</td>
<td>122</td>
</tr>
<tr>
<td>2006</td>
<td>44,559</td>
<td>5,999</td>
<td>120</td>
</tr>
<tr>
<td>2007</td>
<td>44,433</td>
<td>6,493</td>
<td>130</td>
</tr>
<tr>
<td>2008</td>
<td>44,579</td>
<td>6,359</td>
<td>127</td>
</tr>
<tr>
<td>2009</td>
<td>44,829</td>
<td>6,134</td>
<td>122</td>
</tr>
<tr>
<td>2010</td>
<td>44,948</td>
<td>5,489</td>
<td>109</td>
</tr>
<tr>
<td>2011</td>
<td>45,419</td>
<td>5,285</td>
<td>104</td>
</tr>
<tr>
<td>2012</td>
<td>45,308</td>
<td>5,541</td>
<td>109</td>
</tr>
</tbody>
</table>

**Ten Year Per Capita Average** 119

*Source: 2013 Water Resources Status Report*

**Distribution and Storage:** The City’s water distribution system delivers potable water from the treatment plant and one well to customers and fire hydrants via two storage reservoirs, eight pump stations, ten water tanks, and approximately 185 miles of water mains. The City has approximately 14,500 metered potable water customers. The goal of the distribution system is to provide uninterrupted water flow at adequate pressures to meet all fire and domestic flow requirements while minimizing water loss due to leakage. Concurrent with the LUCE Update, the City is developing a hydraulic model and Water Master Plan to identify and prioritize replacement of aged and undersized water distribution facilities.

**Water Treatment.** The City-operated surface water treatment plant is located on Stenner Creek Road, northwest of the Cal Poly campus. The plant was originally constructed in 1964 with a design capacity of eight million gallons per day (MGD). Multiple upgrades have occurred to the plant, the most recent in 2008, increasing the total capacity to 16.0 MGD. The treatment plant is a conventional plant that includes ozone disinfection, coagulation, flocculation, sedimentation, and filtration. Ozone disinfection has allowed the city to meet the trihalomethane limits enforced by the EPA. Currently, the treatment plant meets all compliance regulations.
b. Water Resources Regulatory Setting

Numerous regulatory requirements have been adopted related to the production, storage and distribution of water. Several of the requirements applicable to the evaluation of the LUCE Update project are summarized below.

Urban Water Management Planning Act: The Urban Water Management Planning Act became part of the California water code with passage of AB 797 in 1984. The act requires every urban water supplier (providing water for municipal purposes to more than 3,000 customers or supplying more than 3,000 acre-feet of water annually) to adopt and submit an urban water management plan at least once every five years to the Department of Water Resources. The City’s Urban Water Management Plan was last updated in 2010 and will be updated in 2015 to reflect the LUCE Update.

SB 610 and SB 221: Senate Bill 610 became effective January 1, 2002, and requires cities and counties in connection with the California Environmental Quality Act (CEQA) to review and consider water supply assessments when evaluating certain development projects to determine if projected water supplies can meet the project’s anticipated water demand. SB 610 also requires additional factors to be considered in the preparation of urban water management plans, water supply assessments, and for certain development projects that are otherwise subject to CEQA review. SB 221 requires similar analysis for subdivision maps that meet the threshold review criteria.

Water Code Section 10912: Section 10912 (also contained in CEQA Guidelines Section 15155) identifies development projects that need to be reviewed and considered for impact on the water supply. Those projects are defined as: (a) a residential development of more than 500 dwelling units; (b) a shopping center or business employing more than 1,000 persons or having more than 500,000 gross square feet of floor space; (c) a commercial office building employing more than 1,000 persons or having more than 250,000 gross square feet; (d) a hotel or motel with more than 500 rooms; (e) an industrial or manufacturing establishment housing more than 1,000 persons or having more than 650,000 gross square feet or 40 acres; (f) a mixed use project containing any of the foregoing; or (g) any other project that would generate a water demand at least equal to a 500 dwelling unit residential project.

Senate Bill X7-7: SBX7-7 was enacted in 2009 as part of a proposal to help solve the water issues surrounding the Sacramento/San Joaquin River delta, and requires a 20 percent statewide reduction in urban per capita daily water use by 2020. SBX7-7 requires each urban retail water supplier to develop urban water use targets to help meet the 20 percent reduction goal by 2020 and an interim 10 percent goal by 2015.

c. Wastewater

The wastewater system for the city includes facilities for wastewater collection and treatment. A summary of existing wastewater collection and treatment conditions is provided below.

Collection system: The city’s collection system serves residential, commercial, and industrial customers. Sewer service is provided only to properties within the city limits, with the exception of a few residential properties located just outside of the city limits, Cal Poly San Luis Obispo, and the County of San Luis Obispo Airport. There are approximately 14,400 service connections. The collection system is divided into 18 flow basins with nine lift stations, 133 miles of gravity sewer line and three miles of force main. The gravity sewer lines range in size from six to 48 inches in diameter, and the force main lines range in size from four to 10 inches in diameter.

Parts of the collection system are over 100 years old and are past their design life. Portions of the collection system require frequent preventive maintenance because of root intrusion, poor grade, and/or pipe conditions. The City has also identified portions of the system that have reached their design capacity and will require modifications to accommodate future development. Many lift stations and force mains are also at the end of their service life and will require replacement in the next five years. Concurrent with the LUCE Update, the City is developing a hydraulic model and Infrastructure Replacement Strategy for the collection system to identify existing and future capacity deficiencies and a prioritized schedule for replacement.

The City’s wastewater collection system and the WRRF both experience problems associated with wet-weather infiltration and inflow. The collection system can be overloaded which can result in sanitary sewer overflows. During heavy rains instantaneous peak flows to the WRRF can reach 25 mgd which can present significant operational challenges.
Wastewater Treatment Facilities: The City’s WRRF processes wastewater in accordance with the standards set by the State’s RWQCB. The WRRF removes solids, reduces the amount of nutrients, and eliminates bacteria in the treated wastewater, which is then discharged to San Luis Obispo Creek. The WRRF was last upgraded in 1994 to meet various treatment requirements. In 2013, the WRRF had an average dry weather flow capacity of 5.1 MGD and a peak wet weather flow capacity of 22 MGD. Based on average daily influent flow records for 2000 through 2012 average flows to the WRRF are approximately 4.39 MGD. Of this flow, approximately 0.350 MGD is from Cal Poly and 4.04 MGD is from the city.

The Water and Wastewater Development Impact Fee Study (2013) estimated that future flows to the WRRF would be 5.55 MGD, of which 0.471 MGD would be from Cal Poly and 5.08 MGD would be from the City. The Water Reclamation Facility Master Plan (2000) has evaluated future WRRF treatment capacities ranging from 5.29 to 5.83 MGD.

The City’s WRRF began producing recycled water in 2006 that meets California Code of Regulations Title 22 requirements. An upgrade of the WRRF is planned in response to stricter discharge limits required by the Central Coast Regional Water Quality Control Board, to increase capacity to serve the City’s population at General Plan buildout, and to replace existing aged facilities at the end of their service life. Study and design phases of the WRRF upgrade were scheduled to begin in 2013-14, with construction anticipated in 2016-17.

d. Wastewater Regulatory Setting

Regulatory agencies with jurisdiction regarding domestic wastewater treatment and discharge are summarized below.

Regional Water Quality Control Board (RWQCB): The RWQCB provides standards for the processes used in wastewater treatment.

National Pollutant Discharge Elimination System: The NPDES permits the standards for the discharge of treated wastewater. The standards are to protect the beneficial uses of the receiving water (San Luis Obispo Creek). The NPDES permit incorporates a wide range of regulatory requirements, including Federal and State wastewater discharge permitting requirements, water quality standards and effluent limits, collection and treatment facility operational requirements, and treatment facility monitoring requirements. The City of San Luis Obispo’s WRRF is currently operating under NPDES permit No. CA0049224, Regional Board Order No. R3-2002-0043, issued in March 2005. Major elements of the order include, but are not necessarily limited to, the following:

- Stringent, effluent limits for total dissolved solids (TSS), turbidity, and total coliform.
- Stringent effluent limits for trihalomethanes (THMs), including chloroform, chlorodibromomethane (CDBM), and dichlorobromomethane (DCBM).
- Stringent effluent limits for trace toxics, including copper, cyanide, and numerous trace organics and pesticides.
- Year-round ammonia limits
- Significantly expanded effluent, receiving water, and groundwater monitoring requirements.
- Extensive requirements for studies examining the presence and possible control options for various trace toxic constituents and total dissolved solids.

e. Solid Waste

Solid Waste Collection: The City’s Utilities Department is responsible for administering an exclusive franchise agreement with San Luis Garbage Company to collect and dispose solid waste generated by residential, commercial, and industrial customers in San Luis Obispo. This agreement also includes curbside recycling, and green waste service. The recycling program includes paper, cardboard, plastic, glass, aluminum and tin cans, yard and green waste, office and computer paper, and motor oil and oil filter recycling. Commercial operations that use roll-off services and/or construction and demolition waste removal services may choose any permitted hauler. Services for collection of universal waste (e.g., batteries, electronics, and fluorescent bulbs) are provided by private businesses located throughout the city.
Landfills Serving the City: There are three solid waste disposal facilities within San Luis Obispo County. Most solid waste collected in the city is disposed of at the Cold Canyon Landfill. Table 4.16-4 shows the names, locations, and remaining capacities of these landfills. Cold Canyon Landfill has far less overall capacity than the other landfills in the county.

Table 4.16-4 Solid Waste Disposal Sites City and County of San Luis Obispo July 2012

<table>
<thead>
<tr>
<th>Landfill</th>
<th>Location</th>
<th>Remaining Cubic Yards</th>
<th>Remaining Capacity</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cold Canyon Landfill</td>
<td>2268 Carpenter Canyon Road, San Luis Obispo</td>
<td>1,830,000</td>
<td>16.8%</td>
</tr>
<tr>
<td>Chicago Grade Landfill</td>
<td>2290 Homestead Road, Atascadero</td>
<td>8,329,699</td>
<td>93.0%</td>
</tr>
<tr>
<td>Paso Robles Landfill</td>
<td>Highway 46, Paso Robles</td>
<td>5,327,500</td>
<td>82.0%</td>
</tr>
</tbody>
</table>


The Cold Canyon Landfill is located at 2268 Carpenter Canyon Road, south of the LUCE Planning Subarea. It is a Class III (non-hazardous waste) disposal site, located on 121 acres with a permitted disposal acreage of 88 acres. The facility accepts agricultural, construction and demolition, contaminated soil, dead animals, industrial, inert, mixed municipal, tires, sludge, and greenwaste materials. Cold Canyon Landfill also includes recycling and household hazardous waste collection facilities. Several jurisdictions in San Luis Obispo County send solid waste to the Cold Canyon Landfill, including the county communities and the cities of San Luis Obispo, Pismo Beach, Arroyo Grande, Morro Bay and Grover Beach.

Cold Canyon Landfill is currently (2012) permitted to receive up to 1,620 tons of solid waste per day, with an estimated remaining capacity of 1,830,000 cubic yards (16.8 percent remaining capacity). The landfill’s current conditional use permit was approved in 1991 to extend the life of the landfill at least nine years. However, the landfill has maintained disposal capacity by diversion and recycling process improvements. In 2010, the Cold Canyon Landfill operator estimated the landfill is expected to reach capacity in 2018.

The Cold Canyon Landfill received approvals from the County and the State in 2013 to allow continued waste disposal operations through 2040. The landfill expansion project expands its permitted disposal acreage by 46 acres, increases the allowed daily tonnage to 2,050 tons per day, and allows a new entrance and scale house about a quarter-mile south of the current entrance off of Highway 227.

Solid Waste Diversion: In 2010, San Luis Obispo County sent 226,987 tons of solid waste to landfills. In 2011, the City of San Luis Obispo generated 49,979 tons of solid waste that was disposed at the Cold Canyon Landfill. The San Luis Obispo region has established a population-related solid waste disposal target of 7.4 pounds per person per day, and an employment solid waste disposal target of 18.7 pounds per person per day. The target rates were set at 50 percent of 2006 waste disposal levels. Between 2007 and 2010, the population-related solid waste disposal rate ranged between 4.4 and 5.4 pounds per person, and the employment solid waste disposal rate ranged between 11.7 and 13.8 pounds per person. In addition to existing solid waste diversion, the City’s Climate Action Plan includes the goal to reduce the community waste stream to as close to zero waste as possible, with a 75 percent diversion rate by the year 2020.

f. Solid Waste Regulatory Setting

Numerous regulatory requirements have been adopted related to the management and disposal of municipal solid waste. Several of the requirements applicable to the evaluation of the LUCE Update project are summarized below.

California Department of Resources Recycling and Recovery: The California Department of Resources Recycling and Recovery (CalRecycle) develops, manages, and enforces waste disposal and recycling regulations. CalRecycle requires that the fifty percent diversion requirement established by AB 939 be measured in terms of per-capita disposal and goal measurement to comply with SB 1016 (Wiggins 2008). The San Luis Obispo County Integrated Waste Management Authority reports solid waste disposal rates to CalRecycle on behalf of the City of San Luis Obispo as a Regional Agency.

Assembly Bill 939: Assembly Bill 939 (AB 939) (Public Resources Code 41780) requires cities and counties to prepare integrated waste management plans (IWMPs) and to divert approximately 50 percent of solid waste from landfills. AB 939 also requires cities and counties to prepare Source Reduction and Recycling Elements as part of the IWMP. These elements are designed to develop programs to achieve diversion goals, stimulate local recycling in manufacturing and stimulate the purchase of recycled products.
Assembly Bill 341: Assembly Bill 341 would create “green” jobs by expanding recycling programs to multi-family residences and businesses, and requires that the state achieves a 75 percent solid waste recycling rate by 2020.

4.0 Environmental Impact Analysis

4.0.2. Impact Analysis

a. Methodology and Significance Thresholds.

According to Appendix G of the State CEQA Guidelines, the LUCE Update project would have a significant impact with respect to water provision, wastewater treatment, and solid waste disposal systems if it would:

- Require or result in the construction of new water facilities or expansion of existing facilities, the construction of which could cause significant environmental effects;
- Fail to have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed;
- Require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects;
- Result in a determination that the wastewater treatment provider that it does not have adequate capacity to serve projected demand in addition to existing commitments;
- Result in not being served by a landfill with sufficient permitted capacity to accommodate the project’s solid waste disposal needs; or
- Comply with federal, state, and local statutes and regulations related to solid waste.

b. Project Impacts

| Impact USS-1 | 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. |

Section 5 of the City’s Water and Wastewater Element requires the City to account for water supplies necessary to meet three specific community needs, including primary water supply, reliability reserve, and secondary water supply.

The primary water supply is defined as the amount of water needed to serve the build-out population of the city as identified in the Land Use Element of the General Plan. The quantity of water needed for the primary water supply is calculated using the ten-year average of actual per capita water use and the city’s build-out population. The reliability reserve provides a buffer for future unforeseen or unpredictable long-term impacts to the City’s available water supply. The quantity of water for the reliability reserve is established using twenty percent of the ten-year average of actual per capita water use and the City’s current population. The secondary water supply is the amount of water remaining from the City’s available water resources above those needed to meet the primary water supply and reliability reserve. The secondary supply is identified to meet peak water demand periods or short-term loss of City water supply sources.

EIR Project Description Table 2.4-3 (Total Future Development Capacity within the Planning Subarea) provides an estimate of the dwelling unit buildout potential of the proposed Land Use Element Update. The table indicates that by 2035, buildout of the proposed specific plan areas (San Luis Ranch, Madonna on LOVR, and Avila Ranch) and proposed special planning areas (Foothill at Santa Rosa area, Caltrans site, General Hospital site, Broad Street area, Pacific Beach site, LOVR Creekside area, and the Broad Street at Tank Farm Road site) could result in the development of 2,316 additional residential units in the City. Table 2.4-3 also indicates that buildout of existing specific plans, planned and approved projects, and other vacant land could result in the development of approximately 2,588 additional dwelling units. In total, buildout of the proposed Land Use Element could result in approximately 4,904 additional residential units in the City. When added to the 2013 housing supply of 20,697 units, approximately 25,601 dwelling units could be located in the city upon buildout of the proposed Land Use Element. Using a dwelling unit occupancy rate of 2.29 persons per dwelling unit, buildout of the proposed Land Use Element could support a general plan buildout population of approximately 58,626.
Based on the calculations below, the primary water supply required for estimated buildout demand resulting from the proposed Land Use Element Update would be 7,815 acre feet per year. A per capita water demand of 119 gallons per day has been used for this calculation, although compliance with the water reduction requirements of SBX7-7 would reduce per capita water use to 117 gallons per day by 2020.

\[
\text{LUCE Update Water Demand} = \text{Ten Year Average per Capita Water Use} \times \text{City Buildout Population}
\]

\[
= 119 \text{ gal/cap-day} \times 58,626 \text{ cap} \times 365 \text{ day/year} \times \text{Acre-Ft}/325,853 \text{ gal}
\]

\[
= 7,815 \text{ Acre-Ft/year.}
\]

Table 4.16-5 summarizes water supply and demand conditions associated with the buildout of the proposed LUCE Update. As shown, the amount of water required to serve estimated buildout conditions under proposed 2035 buildout conditions (7,815 acre feet per year) would not exceed total water supplies available to the city (9,980 acre feet per year). Buildout of the proposed LUCE Update would increase the City’s water use from 5,541 acre feet in 2012 to 7,815 acre feet in 2035, an increase of 2,274 acre feet per year over existing conditions.

<table>
<thead>
<tr>
<th>Primary Water Supply</th>
<th>Reliability Reserve</th>
<th>Secondary Water Supply</th>
<th>Total Water Supply</th>
</tr>
</thead>
<tbody>
<tr>
<td>7,815 AF</td>
<td>1,214 AF</td>
<td>951 AF</td>
<td>9,980 AF</td>
</tr>
</tbody>
</table>

As shown on Table 4.16-5, the City would have adequate water supplies to meet per capita demand after buildout of the proposed Land Use Element Update. Therefore, the proposed Land Use Element Update would not result in substantial adverse physical impacts resulting from the construction of new water facilities or the expansion of existing water supplies and facilities.

Senate Bill No. 610 (Costa) became effective January 1, 2002. The bill requires that when a city or county determines a “project” (as defined in Water Code § 10912) is subject to the California Environmental Quality Act (CEQA), it must identify any public water system that may supply water for the project and to request those public water systems to prepare a specified water supply assessment. This assessment can be found in Appendix I (Volume IV, EIR Technical Studies) of the Draft EIR. It should be noted that SB 221 (Kuehl) also requires a similar assessment, but this law only applies to residential subdivisions of more than 500 dwelling units. Because this is a General Plan Update (and not a residential subdivision development), SB 221 does not apply.

The water supply and reliability analysis provided by the 2010 Urban Water Management Plan uses historical information since 1941 for evaluation of water supply availability and safe annual yield for the Salinas and Whale Rock Reservoirs. The analysis of water supply availability is based on the controlling drought period for the two reservoirs, which occurred between 1987 and 1991. Table 4.16-6 summarizes the results of that analysis and indicates the City’s water resources are reliable during extended drought periods. Through the coordinated operation of Salinas and Whale Rock Reservoirs and the ability to use other available water supplies (Nacimiento, recycled water and limited groundwater), climatic conditions such as prolonged drought do not impact the City’s water supply.

<table>
<thead>
<tr>
<th>Average/Normal Water Year (acre feet)</th>
<th>Single Dry Water Year (acre feet)</th>
<th>Multiple Dry Water Years</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Year 1</td>
<td>Year 2</td>
</tr>
<tr>
<td>10,471 (1)</td>
<td>10,471</td>
<td>10,471</td>
</tr>
</tbody>
</table>

Percent of Average/Normal Year

| Percent of Average/Normal Year | 100% | 100% | 100% | 100% | 100% |

\(1) \text{ Water supply of 10,471 acre feet does not include 500 acre foot siltation buffer and assumes a recycled water supply of 151 acre feet rather than 165 acre feet.}

Source: 2010 Urban Water Management Plan
Proposed Land Use Element Development Special Planning Areas

The proposed Land Use Element Update identifies eight potential special planning areas that could provide a mix of residential units and non-residential uses. The proposed special planning areas include: the Foothill at Santa Rosa area, Caltrans site, General Hospital site, Sunset Drive-in site, Pacific Beach site, Calle Joaquin Auto Sales area, LOVR Creekside area, and the Broad Street at Tank Farm Road site. In total, the proposed special planning areas could result in the development of 412 new dwelling units. Using an occupancy rate of 2.29 persons per dwelling unit, buildout of the special planning areas could support a residential population of approximately 943. Based on a per capita water use of 119 gallons per day, the special planning areas would have a water demand of approximately 126 acre feet per year.

The combined water demand of the proposed special planning areas (126 acre feet per year) would be approximately six (6) percent of the city-wide increase in water use (2,274 acre feet per year) that would result from buildout of the entire proposed Land Use Element

Proposed Circulation Element Street Network Changes

The Circulation Element Update identifies 17 proposed street network and other circulation system changes. The proposed changes would generally consist of bicycle- and pedestrian-related improvements; transit system additions; street realignments, extensions and connections; freeway on- and off-ramp modifications; and traffic flow modifications. The proposed street network and circulation system changes would not result in additional population or an increase in per capita water use in the city.

Proposed Land Use Element Specific Plan Areas

Much of the potential residential unit growth identified by the Land Use Element Update would occur on areas included in proposed specific plans and the proposed South Broad Street Area Plan. As indicated on Project Description Table 2.4-3, the San Luis Ranch Specific Plan would have the potential to include approximately 500 residential units; the Madonna on LOVR project could include approximately 115 units; and the Avila Ranch project could include approximately 700 units, for a total of approximately 1,315 residential units. Future development proposed by the South Broad Street Area Plan would have the potential to provide approximately 589 additional dwelling units. In total, the proposed specific plans and area plan could result in the development of 1,904 new dwelling units.

As detailed below, the proposed specific and area plans would have a total potential water demand of approximately 582 acre feet per year.

- **San Luis Ranch Specific Plan Area**
  
The San Luis Ranch Specific Plan could result in the development of approximately 500 residences. Using a dwelling unit occupancy rate of 2.29 persons per dwelling unit, buildout of the specific plan could support a population of approximately 1,145. Based on a per capita water use of 119 gallons per day, the San Luis Ranch Specific Plan would have a water demand of approximately 153 acre feet per year. Additionally, it is important to note that the per capita water use introduced by development of the specific plan area would replace the existing irrigated row crops and associated groundwater use.

- **Madonna on Los Osos Valley Road Specific Plan Area**
  
  This Specific Plan could result in the development of approximately 115 multi-family units. Using a dwelling unit occupancy rate of 2.29 persons per dwelling unit, buildout of the specific plan could support a population of approximately 263. Based on a per capita water use of 119 gallons per day, the Madonna on Los Osos Valley Road Specific Plan would have a water demand of approximately 35 acre feet per year.

- **Avila Ranch Specific Plan Area**
  
  The Avila Ranch Specific Plan could result in the development of approximately 700 residential units. Using a dwelling unit occupancy rate of 2.29 persons per dwelling unit, buildout of the specific plan could support a population of approximately 1,603. Based on a per capita water use of 119 gallons per day, the Avila Ranch Specific Plan would have a water demand of approximately 214 acre feet per year.
### South Broad Street Special Planning Area

Implementation of this Area Plan could result in the development of approximately 589 multi-family units. Using a dwelling unit occupancy rate of 2.29 persons per dwelling unit, buildout of the area plan could support a population of approximately 1,349. Based on a per capita water use of 119 gallons per day, the South Broad Street Area Plan would have a water demand of approximately 180 acre feet per year.

The combined water demand of the proposed specific and area plans (582 acre feet per year) would be approximately 26 percent of the city-wide increase in water use (an increase of 2,274 acre feet per year) over existing conditions (5,541 acre feet in 2012) that would result from buildout of the entire proposed Land Use Element.

### Applicable LUCE Update Policies

The General Plan LUCE Update includes policies intended to minimize and mitigate for potential impacts related to the water availability for potential buildout, including the following:

1.12.1 **Water and Sewer Service.** The City shall not provide nor permit delivery of City potable water or sewer services to the following areas. However, the City will serve those parties having valid previous connections or contracts with the City.
   - Outside the City limits;
   - Outside the urban reserve line;
   - Above elevations reliably served by gravity-flow in the City water system;
   - Below elevations reliably served by gravity-flow or pumps in the City sewer system.

9.3.7 **Sustainable Design [REVELENT PORTION].** The City shall promote and, where appropriate, require sustainable building practices that consume less energy, water and other resources, facilitate natural ventilation, use daylight effectively, and are healthy, safe, comfortable, and durable. Projects shall include, unless deemed infeasible by the City, the following sustainable design features.
   - **Plumbing.** Utilize plumbing fixtures that conserve or reuse water such as low flow faucets or grey water systems.
   - **Efficient Landscaping.** Include landscaping that reduces water use through use of drought-tolerant/native plant species, high-efficiency irrigation (drip irrigation), and reduction or elimination of the use of turf. Collection and use of site runoff and rainwater harvesting in landscape irrigation is encouraged.

### Applicable Existing City Policies

The existing General Plan Water and Wastewater Element includes extensive policies and programs intended to minimize and mitigate for potential impacts related to the availability of water for buildout of the LUCE Update, including the following:

**A 3.1 Goal.** Manage the City’s water resources to meet the current and future water demand requirements associated with development envisioned by the General Plan.

**A 3.2 Basis for Planning.** The City will plan for future development through the Land Use Element taking into consideration available water resources from the Salinas, Whale Rock, and Nacimiento Reservoirs and recycled water.

**A 3.2.2 Coordinated Operation.** The City will coordinate the operation of the Salinas, Whale Rock, and Nacimiento Reservoirs to maximize available water resources.

**A 3.2.3 Groundwater.** Due to limitations for the use of the groundwater resources, the City will continue to use groundwater for domestic purposes when available, but will not consider this source of supply as part of its water resource availability.
Adherence to the existing City’s Water and Wastewater Element and the 2010 Urban Water Management Plan will ensure that impacts related to water demand for new development would remain less than significant. No additional policy direction is required. Individual development will be required to undergo separate environmental review, which may result in specific impacts that require project specific mitigation consistent with these policies.

Mitigation Measures.

The LUCE Update would result in less than significant water supply impacts as the City would have sufficient water supplies available to serve future development that may occur with the implementation of the proposed Land Use Element. No mitigation measures are required.

Significance After Mitigation.

The water supply impacts of the LUCE Update would be less than significant, Class III.

<table>
<thead>
<tr>
<th>Impact USS-2</th>
</tr>
</thead>
<tbody>
<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>
</tr>
</tbody>
</table>

The City’s WRRF has a dry weather flow capacity of 5.1 MGD, and currently receives flows of approximately 4.39 MGD. As shown on LUCE Update EIR Project Description Table 2.4-3 (Total Future Development Capacity within the Planning Subarea), the proposed Land Use Element would facilitate various changes in future development potential in the city. These changes include an increase in residential units, office and commercial square footage, industrial uses, and the number of hotel rooms in the city. Potential future wastewater flows resulting from land use changes proposed by Land Use Element Update are depicted on Table 4.16-7.

Table 4.16-7 Proposed Land Use Element Development Wastewater Generation

<table>
<thead>
<tr>
<th>Land Use</th>
<th>Land Use Element Proposed Development</th>
<th>Wastewater Generation Factor (GPD) (1)</th>
<th>Wastewater Flow (GPD)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Single- Family (Units)</td>
<td>2,420</td>
<td>150/unit</td>
<td>363,000</td>
</tr>
<tr>
<td>Multi-Family (Units)</td>
<td>2,484</td>
<td>105/unit</td>
<td>260,820</td>
</tr>
<tr>
<td>Office (sq. ft.)</td>
<td>1,872,927</td>
<td>54/1,000 sq. ft.</td>
<td>101,138</td>
</tr>
<tr>
<td>Commercial (sq. ft.)</td>
<td>1,920,903</td>
<td>60/1,000 sq. ft.</td>
<td>115,254</td>
</tr>
<tr>
<td>Industrial (sq. ft.)</td>
<td>892,479</td>
<td>54/1,000 sq. ft.</td>
<td>48,193</td>
</tr>
<tr>
<td>Hotel (Rooms)</td>
<td>809</td>
<td>105/room</td>
<td>84,945</td>
</tr>
<tr>
<td>Total Wastewater Flow (GPD)</td>
<td></td>
<td></td>
<td>973,350</td>
</tr>
<tr>
<td>Total Wastewater Flow (MGD)</td>
<td></td>
<td></td>
<td>0.97</td>
</tr>
</tbody>
</table>

(1) Source: 2013 Water and Wastewater Development Impact Fee Study.

Buildout of the proposed Land Use Element would result in wastewater flows of approximately 0.97 MGD, which when added to existing wastewater flows would result in Land Use Element buildout wastewater flows of approximately 5.36 MGD. Future wastewater flows that could result from the buildout of the proposed Land Use Element would exceed the existing WRRF treatment capacity by approximately 0.26 MGD.
Preliminary planning efforts for the expansion of the WRRF have indicated that its treatment capacity could be increased up to 5.83 MGD, which would be adequate to treat wastewater flows resulting from buildout of the proposed Land Use Element. A significant wastewater treatment impact would occur if the WRRF is not expanded or the planned expansion does not provide sufficient treatment capacity to accommodate anticipated Land Use Element buildout conditions. Adequate wastewater treatment to meet future demand could be achieved through the implementation of the general plan policies identified below.

**Proposed Land Use Element Development Special Planning Areas**

The proposed Land Use Element Update identifies eight potential special planning areas that would provide a mix of residential units and non-residential uses. The proposed special planning areas include: the Foothill at Santa Rosa area, Caltrans site, General Hospital site, Sunset Drive-in site, Pacific Beach site, Calle Joaquin Auto Sales area, LOVR Creekside area, and the Broad Street at Tank Farm Road site. As indicated on Project Description Table 2.4-3, the proposed special planning areas would have the potential to result in the development of approximately 412 residential units, approximately 455,174 square feet of commercial area, 284,031 square feet of office area, and 320 hotel rooms. Waste water flow from the special planning areas is estimated on Table 4.16-8.

**Table 4.16-8 Proposed Special Planning Areas Wastewater Generation**

<table>
<thead>
<tr>
<th>Land Use</th>
<th>Specific Plans and Area Plan Proposed Development</th>
<th>Wastewater Generation Factor (GPD) (1)</th>
<th>Wastewater Flow (GPD)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Single- Family (Units)</td>
<td>9</td>
<td>150/unit</td>
<td>1,350</td>
</tr>
<tr>
<td>Multi-Family (Units)</td>
<td>403</td>
<td>105/unit</td>
<td>42,315</td>
</tr>
<tr>
<td>Office (sq. ft.)</td>
<td>284,031</td>
<td>54/1,000 sq. ft.</td>
<td>15,338</td>
</tr>
<tr>
<td>Commercial (sq. ft.)</td>
<td>455,174</td>
<td>60/1,000 sq. ft.</td>
<td>27,310</td>
</tr>
<tr>
<td>Hotel (Rooms)</td>
<td>320</td>
<td>105/room</td>
<td>33,600</td>
</tr>
<tr>
<td>Total Wastewater Flow (GPD)</td>
<td></td>
<td></td>
<td>119,913</td>
</tr>
<tr>
<td>Total Wastewater Flow (MGD)</td>
<td></td>
<td></td>
<td>0.12</td>
</tr>
</tbody>
</table>

(1) Source: 2013 Water and Wastewater Development Impact Fee Study.

The additional wastewater generated by the proposed special planning areas would be approximately 0.12 MGD. This wastewater flow would be approximately 12 percent of the city-wide increase in wastewater generation that would result from buildout of the entire proposed Land Use Element.

**Proposed Circulation Element Street Network Changes**

The Circulation Element Update identifies 17 proposed street network and other circulation system changes. The proposed changes would generally consist of bicycle- and pedestrian-related improvements; transit system additions; street realignments, extensions and connections; freeway on- and off-ramp modifications; and traffic flow modifications. The proposed street network and circulation system changes would not generate additional wastewater flows.

**Proposed Land Use Element Specific and Area Plans**

Much of the potential increase in wastewater flows would result from the development of the proposed San Luis Ranch, Madonna on LOVR, and Avila Ranch specific plans. As indicated on Project Description Table 2.4-3, the proposed specific plans would have the potential to result in the development of approximately 1,315 residential units, approximately 461,000 square feet of commercial area, 166,770 square feet of office area, and 339 hotel rooms. In addition, the proposed South Broad Street Area Plan would have the potential to facilitate the development of an additional 589 dwelling units and 229,068 square feet of commercial uses. Waste water flows from the proposed specific plans and area plan is estimated on Table 4.16-9.
### Table 4.16-9 Proposed Specific Plans and Area Plan Wastewater Generation

<table>
<thead>
<tr>
<th>Land Use</th>
<th>Specific Plans and Area Plan Proposed Development</th>
<th>Wastewater Generation Factor (GPD) (1)</th>
<th>Wastewater Flow (GPD)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Single-Family (Units)</td>
<td>725</td>
<td>150/unit</td>
<td>108,750</td>
</tr>
<tr>
<td>Multi-Family (Units)</td>
<td>1,179</td>
<td>105/unit</td>
<td>123,795</td>
</tr>
<tr>
<td>Office (sq. ft.)</td>
<td>166,770</td>
<td>54/1,000 sq. ft.</td>
<td>9,006</td>
</tr>
<tr>
<td>Commercial (sq. ft.)</td>
<td>690,068</td>
<td>60/1,000 sq. ft.</td>
<td>41,404</td>
</tr>
<tr>
<td>Hotel (Rooms)</td>
<td>339</td>
<td>105/room</td>
<td>35,595</td>
</tr>
<tr>
<td><strong>Total Wastewater Flow (GPD)</strong></td>
<td></td>
<td></td>
<td><strong>318,550</strong></td>
</tr>
<tr>
<td><strong>Total Wastewater Flow (MGD)</strong></td>
<td></td>
<td></td>
<td><strong>0.32</strong></td>
</tr>
</tbody>
</table>

(1) Source: 2013 Water and Wastewater Development Impact Fee Study.

The additional wastewater generated by the proposed specific plans and area plan would be approximately 0.32 MGD. This wastewater flow would be approximately 32 percent of the city-wide increase in wastewater generation that would result from buildout of the entire proposed Land Use Element.

**Applicable LUCE Update Policies**

The General Plan LUCE Update includes policies intended to minimize and mitigate for potential impacts related to wastewater flow treatment for potential buildout, including the following:

- 1.12.1 Water and Sewer Service.

Please refer to the discussion under Impact USS-1, above, for the full policy text.

**Applicable Existing City Policies**

The existing General Plan Water and Wastewater Element includes extensive policies and programs intended to minimize and mitigate for potential impacts related to wastewater collection and treatment for buildout of the LUCE Update, including the following:

**B2.2.2 Service Capacity.** The City’s wastewater collection system and Water Reclamation Facility shall support population and related service demands consistent with the General Plan.

**B2.2.3 Wastewater Service for New Development.** New development shall pay its proportionate or “fair share” of expanded treatment and collection system capacity and upgrades. New development will only be permitted if adequate capacity is available within the wastewater collection system and/or Water Reclamation Facility.

With the implementation of these policies, development identified by the proposed Land Use Element Update could not occur unless it was demonstrated that adequate treatment capacity at the WRRF existed prior to approval of future development projects. Therefore, implementation of the proposed Land Use Element would not result in new development and associated increases in wastewater flows that would exceed the capacity of the WRRF.

**Mitigation Measures.**

With the implementation of the planned WRRF expansion and the policies identified above, the City would have adequate wastewater treatment capacity to serve projected demand in addition to existing commitments. No mitigation measures are required.

**Significance After Mitigation.**

Implementation of the planned WRRF expansion and existing Water and Wastewater Element policies would reduce potential wastewater treatment impacts to a less than significant level. Future development projects would be required to demonstrate that adequate treatment capacity exists prior to the approval of those projects.
Impact USS-3

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.

Parts of the city’s water distribution and wastewater collection systems are approaching or are past their estimated lifespan. In addition, new development proposed by the Land Use Element Update could require the installation of new or upgraded water transmission and distribution mains, and the installation of new water tanks. The City’s Water Master Plan will identify needed improvements to the water distribution system, including water tanks that are undersized. Wastewater collection to serve new development may also require the installation of new or upgraded gravity sewer lines, force mains and pump stations. The Infrastructure Renewal Strategy will identify capacity issues for the wastewater collection system and a prioritized list of replacements.

It is anticipated that most infrastructure improvements needed to serve development facilitated by the proposed Land Use Element would be required in conjunction with the development of the proposed San Luis Ranch, Madonna on LOVR, and Avila Ranch Specific Plan areas. For example, the Avila Ranch Specific Plan area is not served by any water and sewer service infrastructure and will require the construction of a new sewer lift station. Other development that may occur in the proposed special planning areas may also require water and sewer service infrastructure improvements.

Environmental impacts that may result from the construction of new or upgraded infrastructure pipelines, water tanks, lift stations and other facilities generally include the potential for short-term impacts such as construction-related increases in noise and air emissions, temporary roadway lane closures and other circulation-related impacts, water quality impacts from increased erosion or an accidental release of construction materials. Impacts to sensitive biologic or cultural resources may also result if resources are present within or adjacent to proposed construction corridors. The construction of above-ground facilities, such as water tanks, may have the potential to result in long-term aesthetic impacts.

Applicable LUCE Update Policies

Short-term construction impacts that may be result from infrastructure improvement projects are usually minimized by standard construction site and operation measures such as: designing projects to avoid or minimize construction activities in or adjacent to sensitive areas; implementing appropriate resource protection/restoration measures; implementing standard safety precautions; conducting construction activities in a manner that minimizes equipment use and other construction activities within and adjacent to construction corridors; and compliance with applicable regulatory requirements and City policies. For example, Land Use Element policy 12.3.11 (Environmental Review) requires project-specific reviews to identify potential on- and off-site environmental impacts that may result from future infrastructure improvements.

12.3.11 Environmental Review. The purpose of the City’s Environmental Review process is to develop and maintain a high quality environment now and in the future. Some projects may be exempted from environmental review by state law or city procedures. For those projects subject to environmental review, features to be examined would include but not be limited to, toxic contamination, air quality, open space preservation, sustainability impacts, scenic values and impacts, airport operations, ground slopes, seismic hazards, soil and groundwater characteristics, wildlife habitats, road and rail traffic noise, water and sewer service limits, access and circulation, and historic and archaeological resources. is a formal way to inform the public and decision-makers of the expected consequences of their actions. Two common types of environmental documents are environmental impacts reports and "initial studies." Before considering private proposals for a major development, such as a specific plan or special-design area, the City should conduct an evaluation of environmental opportunities and constraints, to which a private proposal can respond. The City is committed to early and meaningful participation by the community in the environmental review process to help inform the public and decision-makers of the potential environmental consequences of their actions. Features to be examined would include toxic contamination, airport operations, ground slopes, seismic hazards, soil and
groundwater characteristics, significant wildlife habitats, road and rail traffic noise, water and sewer service limits, access and circulation, and historic and archaeological resources.

Through the City’s existing environmental review process, project-specific measures to reduce infrastructure construction impacts to the extent possible can be identified and incorporated into the design and operation of infrastructure improvement projects.

**Mitigation Measures.**

With adherence to the policy and development review requirements identified above, potential infrastructure construction impacts would be less than significant and no mitigation measures are required.

**Significance After Mitigation.**

Implementation of LUCE Update policies would reduce potential infrastructure construction impacts to a less than significant level. Subsequent development projects would be required to demonstrate compliance with the applicable policies and regulatory requirements, and if required, may be subject to the implementation of additional mitigation measures.

<table>
<thead>
<tr>
<th>Impact US-4</th>
</tr>
</thead>
<tbody>
<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>
</tr>
</tbody>
</table>

Most of the solid waste generated by residential and non-residential land uses in San Luis Obispo is sent to the Cold Canyon Landfill for disposal. A recently approved expansion of the landfill extended its service life to 2040. With the implementation of the recently approved landfill expansion, the Cold Canyon landfill will accommodate the City’s long-term solid waste disposal needs through 2040. Other potential solid waste disposal sites that could serve the City include the Chicago Grade and/or Paso Robles landfills, or at out of county waste disposal facilities.

New development facilitated by the proposed Land Use Element that would most substantially increase the demand for additional solid waste disposal capacity would be the residential and non-residential uses proposed for the San Luis Ranch, Madonna on LOVR, and Avila Ranch Specific Plan areas, and the South Broad Street Area Plan site.

**Applicable LUCE Update Policies**

Potentially significant solid waste disposal impacts that could result from inadequate disposal capacity would be minimized by Land Use Element policy 1.14 (Solid Waste Capacity), which requires that adequate solid waste disposal capacity be available to serve new development. The policy states:

**1.14 Solid Waste Capacity** In addition to other requirements for adequate resources and services prior to development, the City **must** determine requires that adequate solid waste disposal capacity will be available exists before granting any discretionary land use approval which would increase solid waste generation.

San Luis Obispo City and County are focusing on waste diversion and recycling efforts to minimize future waste disposal impacts. For example, new development projects are required to minimize short-term waste disposal impacts by recycling construction and demolition waste. Long-term waste disposal impacts are minimized by including facilities for the collection and storage of recyclables in new development projects. These efforts will enhance the ability of the City to achieve a 75 percent diversion rate by the year 2020 and to ultimately be as close to zero waste as possible.
Mitigation Measures.

With adherence to the policy requirements identified above, potential solid waste disposal impacts would be less than significant and new development facilitated by the Land Use Element Update would not interfere with the City’s ability to comply with regulations related to solid waste management or increased solid waste diversion rates. Therefore, no mitigation measures are required.

Significance After Mitigation.

Implementation of LUCE Update policies would reduce potential solid waste disposal and diversion impacts to a less than significant level. Subsequent development projects would be required to demonstrate compliance with the applicable policies and regulatory requirements, and if required, may be subject to the implementation of additional mitigation measures.

4.16.3. Cumulative Impacts

Cumulative impacts of the proposed LUCE Update include the potential for increased water demand and wastewater flow treatment, potential impacts related to construction of new or upgraded City water and wastewater infrastructure and facilities, and increased solid waste generation and associated impacts to existing and proposed solid waste disposal facilities.

As a General Plan Update, cumulative impacts are treated somewhat differently than would be the case for a project-specific development. By its nature, the LUCE Update considers cumulative development within the city and potential expansion areas. Thus, cumulative impacts are generally equivalent to project-specific impacts.

The water and wastewater treatment analysis provided above evaluates potential impacts of cumulative development resulting from buildout of the proposed Land Use Element. The analysis determined that future water and wastewater service impacts would be less than significant. Except for existing uses such as Cal Poly, the airport, and minor amounts of residential development, the City does not provide water or sewer service to uses located beyond the city limits. Therefore, growth in the region would not result in cumulative impacts related to water and sewer services provided by the City.

In regard to the City’s practice of not providing water service outside of the city, proposed Land Use Element Policy 1.12.1 states:

1.12.1 Water and Sewer Service. The City shall not provide nor permit delivery of City potable water or sewer services to the following areas. However, the City will serve those parties having valid previous connections or contracts with the City.

A. Outside the City limits;
B. Outside the urban reserve line;
C. Above elevations reliably served by gravity-flow in the City water system;
D. Below elevations reliably served by gravity-flow or pumps in the City sewer system.

The proposed policy language change specifies that potable water shall not be provided beyond the city limits. The proposed policy change would, however, allow recycled non-potable water to be provided outside the city limits. The proposed policy would be consistent with Program 7.3.4 of the City’s Water and Wastewater Element of the General Plan, which states:

Program 7.3.4. Consider the potential to deliver available recycled water supplies to customers outside the city limits, including analysis of policy issues, technical concerns, and cost recovery, provided it is found to be consistent with the General Plan.
4.0 Environmental Impact Analysis

Providing recycled water to areas beyond the city limits would also be consistent with requirements of Government Code Section 56133e (the Cortese-Knox-Hertzberg Act), which indicates that extending surplus water service to any project outside the city limits that will support or induce development requires written approval from the Local Agency Formation Commission (LAFCO) before the transfer is made. However, LAFCO approval is not required for the transfer of non-potable water.

Solid waste generated by future development in the city, and development facilitated by the proposed Land Use Element, would contribute to the demand for solid waste disposal capacity in the County. With the implementation of local and state requirements to increase existing waste diversion rates and the total solid waste disposal capacity available in the County, the additional solid waste generated by future development in the city would not be cumulatively considerable and would not result in a significant cumulative solid waste disposal impact.
Please see the next page.
Please see the next page.
CEQA Guidelines Section 15126.2, Consideration and Discussion of Significant Environmental Impacts, indicates that the following evaluations of a proposed project’s environmental impacts are to be included in an EIR:

- The Significant Environmental Effects of the Proposed Project.
- Significant Environmental Effects Which Cannot be Avoided if the Proposed Project is Implemented.
- Significant Irreversible Environmental Changes Which Would be Caused by the Proposed Project Should it be Implemented.
- Growth-Inducing Impact of the Proposed Project.

The significant environmental effects of the proposed LUCE Update Project, as well as the significant environmental effects of the Project that cannot be reduced to a less than significant level, are described in Section 4.0 of this EIR. This section of the EIR describes the potential for the LUCE Update Project to result in significant irreversible environmental effects and growth inducing impacts.

### 5.1. Significant Irreversible Environmental Effects

CEQA Guidelines §15126.2(c) requires a description of the significant irreversible environmental effects that would be caused by the proposed project should it be implemented. As described by this section of the CEQA Guidelines, examples of significant irreversible environmental effects may include the following:

- The use of non-renewable resources during the initial and continued phases of the project which may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely.
- Primary impacts and, particularly secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses.
- Irreversible damage which may result from environmental accidents associated with the project.

Development of residential and non-residential uses identified by the LUCE Update would require the use of non-renewable building materials and energy, and the long-term occupancy and use of proposed residential and non-residential would irreversibly increase local demand for non-renewable energy resources. The use of building materials and long-term energy use that would result from the implementation of the LUCE Update would not result in the use of non-renewable resources in a wasteful manner, and would not be excessive in consideration of the additional population of the city that would be served by the use of those resources. Therefore, the proposed LUCE Update would not result in significant irreversible environmental effects related to the use of non-renewable resources.

The proposed Circulation Element Update identifies seventeen potential street network changes that may be considered for future implementation. In general, the proposed street network changes would enhance existing vehicle, bicycle and pedestrian circulation; eliminate a previously proposed bridge over the Union Pacific railroad tracks; provide minor street realignments and connections; alter existing Highway 101/State Route 1 ramps and interchanges; and convert one-way streets to two-way circulation. These types of street network changes would result in localized improvements intended to
enhance transportation and minimize circulation-related conflicts. The proposed street network modifications would not provide vehicle access to previously inaccessible areas.

Implementation of the LUCE Update would result in the development of additional residential and non-residential uses at specified locations throughout the city. Non-residential uses that have been proposed consist primarily of office and commercial uses, which would not have a substantial potential to result in accidents that would result in irreversible environmental damage. The policy and program updates proposed by the Land Use Element reflect airport safety, noise, airspace protection and overflight considerations consistent with the purposes of the State Aeronautics Act to preserve and enhance compatibility between airport activities and land uses around the airport. The implementation of these policies would reduce the potential for future airport-related accidents in the city.

### 5.2. Growth Inducing Impacts

Section 15126.2(d) of the CEQA Guidelines requires that an EIR evaluate “the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth.” This Section also indicates “It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.”

The General Plan provides a “blueprint” for the physical growth of the City. While the General Plan does not propose or implement any specific development projects, it does establish land use and policy requirements that control future population and economic growth within the City and its planning area. As proposed, buildout of the proposed the LUCE Update would facilitate the development of approximately 4,904 additional dwelling units and approximately five million additional square feet of non-residential land uses in the city. Of this possible future development, approximately 2,316 residential units and 1.99 million square feet of non-residential uses would be located on three proposed specific plan sites and nine “opportunity” sites identified as part of the LUCE Update process. Based on these potential future development characteristics, adoption of the proposed LUCE Update would indirectly foster population and economic growth in the city. However, the possible future population and economic growth effects of the LUCE Update would be consistent with the goal of the General Plan to functions as a guide to the ultimate pattern of development in the city.

As indicated by CEQA Guidelines Section 15126.2(d), a project may be considered growth inducing if it would remove an obstacle to population growth. Examples of actions that may remove an obstacle to growth include providing access to an otherwise inaccessible area, or providing public utilities in or near areas where those services are currently not available. The physical circulation system modifications proposed by the LUCE Update would generally serve localized areas in developed portions of the City, and would not result in the extension of roads into or near areas that are currently inaccessible. Implementation of the LUCE Update would result in extensions of water and waste water utilities to areas that currently do not have those services, such as the proposed Avila Ranch Specific Plan site. However, based on existing and proposed Land Use Element policy requirements, future utility service could not be provided to areas located beyond the city limits where future residential and non-residential growth is not anticipated. Therefore, the proposed LUCE Update would not result in actions that would remove an obstacle to population growth.

In conclusion, the proposed LUCE Update would facilitate the orderly growth of the City and would not remove an obstacle to future unanticipated growth. Based on these considerations, the proposed LUCE Update would not result in a significant growth inducing impact.
Please see the next page.
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, an EIR is to consider a “range of reasonable” alternatives to foster informed decision-making and public participation. The LUCE Update process has included extensive efforts to identify and select the land use options included in the proposed LUCE Update. As a result of those efforts, the proposed LUCE Update is a focused effort that concentrates on identifying locations in the city with the potential to accommodate changes in land use type or intensity, or areas in need of circulation improvements. For land use, most of the city’s neighborhood areas were noted as “preserve and enhance” to indicate that changes would not be proposed related to the existing General Plan land use requirements. The locations identified by the proposed LUCE Update as areas of potential land use or circulation change were refined through an extensive review process, and one or more future development options were considered for each location. The potential development options considered a wide range of issues, such as existing/proposed circulation patterns, type of adjacent uses, neighborhood connections, and proximity to services and similar land uses.

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.”

As described in Section 2.6 of this EIR, the objectives of the LUCE Update Project are to:

**Land Use Element**

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; and
6. Maintain a healthy and attractive natural environment within a compact urban form.

**Circulation Element**

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; and  
6. Establish and maintain livable street corridors.  
7. Support the development and maintenance of a circulation system that balances the needs of all circulation modes.

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. The three additional street network changes were options identified during the preliminary public review of potential street system changes but were not included in the proposed draft Circulation Element.

### 6.1 Alternatives Considered but Removed From Consideration

Several potential alternatives of the proposed LUCE Update were considered but removed from further analysis because they may not be feasible or would result in increased environmental impacts when compared to the impacts of the proposed project. Alternatives removed from further consideration are described below.

**Reduced Residential Unit Capacity.** This alternative would only reduce the residential unit development capacity of the proposed Land Use Element Update. This alternative was rejected as being potentially infeasible because it would have the potential to leave the city unable to meet capacity for future regional housing needs allocations.

**Reduced Non-Residential Capacity.** This alternative would reduce the non-residential development capacity proposed by the Land Use Element Update, but would not change the number of residential units that have been proposed. This alternative was removed from further consideration because a substantial reduction in non-residential uses, such as neighborhood-serving uses and/or a reduction of proposed job center and commercial areas, would have the potential to increase vehicle miles travelled if city residents were to drive to more distant services and job locations. Such an alternative would have the potential to result in increased traffic, air quality, greenhouse gas, and noise impacts when compared to the proposed project. In addition, the proposed Project includes conversion of planned non-residential development to primarily residential uses in the San Luis Ranch and Avila Ranch areas.

**Provide Additional Residential Development Outside the LUCE Planning Area.** This alternative would have provided additional residential units beyond the existing city limits and was rejected based on its potential to result in increased vehicle miles travelled and associated impacts, potential increased impacts from additional urban development in predominately undeveloped unincorporated areas (i.e., aesthetics, biological resources), inconsistency with greenbelt and agricultural preservation policies, and inconsistency with project objectives of providing residential infill opportunities.

**Alternative Locations.** The LUCE Update has included an extensive process of alternative site evaluation and selection. Based on that effort, a reasonable range of sites were identified that may be suitable to accommodate additional residential and non-residential development in the city.

**Prado Overpass instead of Interchange.** The technical work to support the Circulation Element update modeled network impacts associated with providing an overpass at Prado Road instead of the planned full interchange with freeway on- and off-ramps. With an overpass alone, vehicular traffic is redistributed. For build-out of development envisioned in the Land Use Element, this reduces traffic on Prado between Higuera and Hwy 101, however, it results 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. The redistribution increases traffic volumes and congestion levels at Higuera and Madonna and Los Osos Valley Road and Hwy 101 beyond acceptable thresholds, and therefore the proposed project retains the planned infrastructure of a full interchange at Prado Road and Hwy 101.
Eliminate Bishop Street Extension. The existing Circulation Element shows an overpass from Bishop Street on the east over the railroad tracks to connect to Santa Barbara Street on the west. This anticipated overpass provides an east-west connection for traffic traveling to and from Johnson Avenue between Laurel/Orcutt and Pismo/Buchon. For build-out of development envisioned with the Land Use Element and regional increases in traffic, circulation modeling shows that when the Bishop Street extension is eliminated, it increases traffic volumes in the Pismo and Buchon neighborhoods beyond acceptable thresholds. However, the high cost and technical difficulties in constructing and connecting an overpass in this location make completion of this infrastructure especially challenging. For these reasons, the planned Bishop Street extension was retained in the proposed Circulation Element with the recommendation to add policy language to investigate offsetting measures that would allow elimination of the Bishop Street extension without impacting the Pismo and Buchon neighborhoods.

Extend Calle Joaquin to Froom/Prado Roads. This alternative connection was evaluated in the circulation section but rejected. While it provides some improvement to overall circulation in the immediate area, the effects are negligible and the benefits are localized. This marginal circulation improvement comes at the cost of impacts to farmland, high fiscal cost to implement and increased congestion at the LOVR and Hwy 101 Interchange. For these reasons, the extension of Calle Joaquin was not supported as part of the proposed project.

6.2 No Project Alternative

The No Project Alternative compares the environmental impacts of the proposed LUCE Update to the impacts that would result if the project were not approved and future development in the city occurred in accordance with the land use and policy requirements of the existing 1994 Land Use and Circulation Elements.

Land Use Element

If the No Project Alternative were to be implemented, future land use projects in the city would generally consist of new development located in the three previously approved Specific Plan areas (Margarita, Airport and Orcutt Area Specific Plans); the development of previously approved and planned projects; and the development of other vacant land in the city in accordance with existing land use designation and policy requirements. A description of the development that could occur in the city based on existing Land Use Element requirements is summarized below and on Table 6.2-1.

Opportunity Sites

The City has identified 12 opportunity sites (i.e., proposed specific plan and special planning areas) within the LUCE Planning Subarea, and the proposed growth potential of those sites has been analyzed by the LUCE Update EIR. The analysis below, however, evaluates the potential capacity in these sites under the existing General Plan. Opportunity sites are estimated to result in 472 new dwelling units and 3,325,552 square feet of new non-residential floor area.

Existing Specific Plans

There are three key specific plans within the LUCE Planning Subarea: The Margarita Area Specific Plan, the Airport Area Specific Plan, and the Orcutt Area Specific Plan. After capacity from the Avila Ranch and Broad Street at Tank Farm Road opportunity sites were removed to avoid double counting, the three specific plan areas account for 1,847 units and 2,771,832 square feet of new non-residential floor area.

Planned Projects

Planned projects include developments with approved land use entitlements, pending building permit approval, in plan check, or under construction. There are eight planned or approved projects outside the opportunity sites, including three residential and five mixed use developments. Together, these projects would result in an estimated 289 new housing units and 88,000 square feet of non-residential floor area.

Other Vacant Land

Other vacant land includes what could realistically be developed on remaining vacant land within the LUCE Planning Subarea based on constraints and historical development practice. Table 3.1-11 shows the breakdown of vacant land by land use designations in 2013, excluding approved projects, vacant land in specific plan areas, and vacant land within
opportunity sites. Excluding these areas, the city has 87 acres of vacant land. Services and Manufacturing and Low Density Residential areas account for the greatest number of vacant, developable acres.

Based on allowed density, anticipated infrastructure, and development history, vacant land in San Luis Obispo can support an additional 452 units. Most of these units would be in low, medium, and high density residential areas. Based on allowed FAR, anticipated infrastructure, and development history, vacant land in San Luis Obispo can support an additional 230,433 square feet of non-residential development.

In total, under the existing 1994 Land Use Element, San Luis Obispo has a capacity for 3,060 new residential units and 6,415,817 square feet of non-residential floor area.

The analysis of the No Project Alternative has assumed that the specific plan areas identified by the proposed Land Use Element Update (San Luis Ranch, Madonna on LOVR, and Avila Ranch) would retain their existing general plan land use designations and develop under current assumptions (a mix of commercial and residential uses for San Luis Ranch, limited commercial for a small portion of Madonna on LOVR, and Business Park uses for Avila Ranch). The proposed South Broad Street Area Plan would also not be implemented and development in that area would occur as allowed under that area’s existing Services and Manufacturing land use designation. In addition, only portions of the development/redevelopment of vacant or under-utilized land in the eight special planning areas identified by the LUCE Update would occur. For the areas designated Interim Open Space, no development is presumed to occur. For other areas where policy direction has been proposed, the sites are assumed to develop within currently allowed land use designations.

For comparison purposes, the proposed Land Use Element would provide the capacity to develop 4,904 additional dwelling units in the city; while under the 1994 Land Use Element, 3,060 additional dwelling units could be provided. Therefore, buildout of the existing Land Use Element would result in 1,844 fewer dwelling units when compared to the proposed Land Use Element. The proposed Land Use Element would provide the capacity to develop a total of 5,081,708 square feet of non-residential uses; while under the 1994 Land Use Element, 6,415,817 additional square feet of non-residential uses could be provided. Therefore, buildout of the existing Land Use Element would result in an increase of 1,334,109 square feet of non-residential uses when compared to the proposed Land Use Element.
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<th>Non-Residential (FAR)</th>
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<th>Office</th>
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<th>Industrial</th>
<th>Hotel</th>
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<td>0</td>
<td>0</td>
<td>-</td>
<td>4,000</td>
<td>7</td>
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<tr>
<td>Subtotal</td>
<td>10</td>
<td>279</td>
<td>289</td>
<td>660</td>
<td>10,000</td>
<td>78,000</td>
<td>-</td>
<td>150</td>
<td>-</td>
<td>88,000</td>
<td>252</td>
<td></td>
</tr>
</tbody>
</table>

Table 6.2-1  Potential Capacity from Opportunity Sites, Specific Plans, Planned Projects and Other Vacant Land, San Luis Obispo 2013
<table>
<thead>
<tr>
<th>Other Vacant Land (by General Plan Designation)¹²</th>
<th>Acres</th>
<th>Residential (Units/Acre)</th>
<th>Non-Residential (FAR)</th>
<th>Units²</th>
<th>Capacity</th>
<th>Non-Residential Square Footage²</th>
<th>Employment¹⁰</th>
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<tbody>
<tr>
<td>Suburban Residential¹</td>
<td>4.0</td>
<td>1</td>
<td></td>
<td>4</td>
<td>4</td>
<td>9</td>
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<tr>
<td>Low Density Residential</td>
<td>53.4</td>
<td>6</td>
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<td>320</td>
<td>320</td>
<td>733</td>
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<td>Medium Density Residential</td>
<td>7.1</td>
<td>10</td>
<td>-</td>
<td>71</td>
<td>71</td>
<td>163</td>
<td>-</td>
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<tr>
<td>Medium-High Density Residential</td>
<td>0.4</td>
<td>16</td>
<td>-</td>
<td>6</td>
<td>6</td>
<td>14</td>
<td>-</td>
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<tr>
<td>High Density Residential</td>
<td>2.7</td>
<td>19</td>
<td>-</td>
<td>51</td>
<td>51</td>
<td>117</td>
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<tr>
<td>Neighborhood Commercial</td>
<td>0.2</td>
<td>0.30</td>
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<td></td>
<td></td>
<td>2,614</td>
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<td>Community Commercial</td>
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<td>6,098</td>
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<td>Subtotal</td>
<td>87</td>
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<td>395</td>
<td>57</td>
<td>452,1036,859</td>
<td>3,606,895</td>
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<tr>
<td>Total Capacity</td>
<td>1,753</td>
<td>1,307</td>
<td>3,060</td>
<td>7,007</td>
<td>25,918</td>
<td>59,678</td>
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<td>920,357</td>
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<td></td>
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<td></td>
<td>6,415,817</td>
<td>16,760</td>
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</tbody>
</table>

¹ Typical density and FAR is based on a net acre assumption accounting for necessary infrastructure and facilities. To get the typical density, the maximum density was recalculated based on a percent assumption on what is average for new development.

² Unit capacity for other vacant land is calculated by multiplying acres and the typical density.

³ Population based on 2010 Census estimate of 2.29 persons per household.

⁴ 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 calculated by multiplying acres and the typical FAR.

⁵ Employment is estimated using 300 square feet per employee for office uses, 550 square feet per employee for commercial uses, 750 square feet per employee for industrial uses, and 1,150 square feet per employee for hotels/motels.

⁶ Opportunity Sites estimate the net new residential and non-residential development in opportunity areas under the existing General Plan. Units and non-residential square footage are calculated based on existing general plan designations and input from the City. Some of these sites have existing development that will likely be adapted to facilitate new development.

⁷ Non-Residential square footage includes land designated neighborhood commercial, services commercial, business park, and manufacturing.

⁸ The Airport Area Specific Plan (AASP) does not include capacity from the Avila Ranch or Broad St. @ Tank Farm opportunity sites. These sites are counted in the opportunity sites section. Non-residential square footage in the AASP includes 605,293 square feet from underutilized land that is likely to redevelop. Remaining capacity in the AASP based on analysis conducted by the City of San Luis Obispo Planning and GIS staff.

⁹ Does not include projects that fall within the boundaries of the Specific Plan areas or the opportunity sites. Only those projects that provided specific unit/square footage numbers were included.

¹⁰ Does not include parcels that fall within the boundaries of the Specific Plan Areas, opportunity sites, or planned and approved projects. Acres are taken from the vacant land category in the existing land use inventory.

Sources: Community Development Department Project Status Report (December 31, 2012), San Luis Obispo General Plan, Land Use Element, 2010; City of San Luis Obispo, 2014; Matrix, 2014; Mintier Harnish, 2014.
6.0 Alternatives

Circulation Element

Under the No Project Alternative, several new street network changes and circulation system modifications identified by the Circulation Element Update would not be implemented. In addition, policies and programs intended to reduce vehicle trips; and to enhance transit, bicycle, and pedestrian circulation would also not be implemented.

Aesthetics. Most of the future development in the city that could occur under the No Project Alternative would be located on the previously approved specific plan areas, and at various infill sites located throughout the city. The No Project Alternative would reduce new development in the Madonna on LOVR specific plan area and would change the type of infill development in the City when compared to the proposed Update Project. By reducing the amount of future development on the Madonna on LOVR specific plan area, potential aesthetic impacts associated with the development of the open area at that site would be avoided. The potential for future aesthetic conflicts between existing and proposed uses at the infill sites would be reduced, and the potential for future lighting-related impacts would also be reduced. Because the existing General Plan envisions development on the San Luis Ranch, Avila Ranch, and South Broad Street areas, the type of development that could occur under the No Project Alternative would change, but development would be anticipated to occur in those areas. The No Project Alternative would have reduced aesthetic impacts when compared to the less than significant impacts of the proposed Project, however, future development under this alternative would also have the potential to result in significant impacts. Future development that may occur under this alternative would be required to comply with applicable policies of the 1994 Land Use and Circulation Elements, and may also be required to implement mitigation measures identified by project-specific environmental reviews to reduce aesthetic impacts to a less than significant level.

Agricultural Resources. The No Project Alternative would reduce new urban uses at the Madonna at LOVR specific plan area and several future development sites identified by the LUCE Update, including the areas currently designated Interim Open Space. Retaining those areas in their primarily open space condition would reduce Project-related impacts resulting from the conversion of agricultural soils to urban uses, and the potential for conflicts between agricultural operations and adjacent urban uses. The No Project Alternative would not eliminate the potential for future impacts to agricultural resources, as the buildout of the previously approved specific plans and areas envisioned for development under the 1994 Land Use and Circulation Elements would also result in the loss of agricultural soils and would have the potential to result in conflicts with nearby farming operations.

Air Quality. The No Project Alternative would result in 1,844 fewer residential units and 1.33 million more square feet of non-residential development than would occur if the proposed LUCE Update were to be implemented. It is estimated that the No Project Alternative would result in 1,346,530 daily vehicle miles traveled and 6,695 daily vehicle hours of delay; while the proposed LUCE Update would result in 1,356,310 daily vehicle miles travelled and 5,100 daily hours of vehicle delay. Therefore, the No Project Alternative would result in 9,780 fewer daily vehicle miles travelled, but an increase of 1,595 daily vehicle hours of delay when compared to the proposed Project. The reduction in vehicle miles travelled would occur due to the reduced number of dwelling units and associated population in the city, while the increased hours of delay would occur because several proposed street system modifications would not be made. The increased hours of vehicle delay could have localized air quality effects; however, the decrease in vehicle miles travelled would result in reduced mobile emissions when compared to the proposed Project.

The substantial increase in non-residential development that would occur if the No Project Alternative were to be implemented would result in increased short-term construction emissions when compared to the short-term emissions of the proposed Project. However, long-term vehicle emissions of the No Project Alternative would be decreased when compared to the impacts of the proposed Project. Overall, the No Project Alternative would have decreased air quality emission impacts when compared to the emissions and impacts of the proposed Project. However, similar to the proposed Project, the total emissions resulting from additional development that may occur consistent with the 1994 Land Use Element would exceed adopted emission significance thresholds and would result in a significant and unavoidable air quality impact.

The No Project Alternative would not implement proposed Circulation Element policies that would enhance transportation and circulation systems that have air quality benefits, such as reducing vehicle delays; and increasing the use of transit, bicycle and pedestrian systems. This beneficial aspect of the proposed LUCE Update Project would not be achieved if the No Project Alternative were to be implemented.
Biological Resources. The No Project Alternative would avoid developing new urban uses on the one proposed specific plan area identified by the LUCE Update, and would focus new development onto the previously approved specific plans, anticipated development areas such as San Luis Ranch, and infill development sites. Retaining the proposed Madonna at LOVR specific plan area and Creekside LOVR area primarily as open space would reduce the potential for Project-related impacts to common habitats; would reduce the potential for impacts to plant and animal species of local concern; and would also minimize Project-related impacts to special status plants, animals, and the habitats that support those species. Therefore, the No Project Alternative would have reduced impacts to biological resources when compared to the less than significant impacts of the proposed LUCE Update Project. Although the potential for biology-related impacts would be reduced, future development under the No Project Alternative would also have the potential to result in significant impacts. Future development that may occur under this alternative would be required to comply with applicable policies of the 1994 Land Use Element, and may also be required to implement mitigation measures identified by project-specific environmental reviews to reduce project-related impacts to biological resources to a less than significant level.

Cultural Resources. The No Project Alternative would avoid developing new urban uses at the future development sites identified by the LUCE Update, and would reduce development at the relatively undisturbed Madonna at LOVR specific plan site. Retaining this area in its primarily open space condition would avoid potential impacts to archaeological resources that could result from the disturbance of previously undetected artifacts, and would also avoid potential impacts to historical resources located on or near the specific plan areas. Therefore, the potential cultural resources impacts of the No Project Alternative would be reduced when compared to the less than significant impacts of the proposed LUCE Update Project. The No Project Alternative would not eliminate the potential for future impacts to cultural resources, as the buildout of the previously approved specific plans and future infill development projects would also have the potential to impact archaeological and historical resources. Similar to the proposed Project, it is anticipated that those potential impacts would be reduced to a less than significant level with the implementation of existing 1994 Land Use Element policies, along with the implementation of applicable resource protection and environmental review requirements.

Geology and Soils. Most of the future development in the city that could occur under the No Project Alternative would be located at the previously approved specific plan sites, and various infill sites located throughout the city. The No Project Alternative would reduce new development in the proposed Madonna at LOVR specific plan area and would reduce the amount of infill development in the City. By reducing the amount of future development, potential construction-related erosion and sedimentation impacts would be reduced, and long-term potential impacts from geologic hazards would also be minimized. Therefore, the geology and soils impacts of the No Project Alternative would be reduced when compared to the less than significant impacts of the proposed LUCE Update Project. However, similar to the proposed Project, the development of new land uses consistent with the land use designations of the 1994 Land Use Element would still have the potential to result in significant geology- and soils-related impacts. It is anticipated that those potential impacts could be reduced to a less than significant level with the implementation of existing general plan policy requirements, building code requirements, and mitigation measures identified by project-specific environmental reviews.

Global Climate Change. In 2009, the City conducted a Greenhouse Gas (GHG) emissions inventory of annual emissions for the baseline year 2005. The inventory includes estimated community-wide emissions for the transportation, residential and commercial/industrial energy usage (electricity and natural gas), and solid waste sectors. The City’s CAP also included forecasted business-as-usual (BAU) emissions under the current Land Use Element for 2010, 2020, and 2035, consistent with population, housing and employment data for 2010 and projections for 2020 and 2035. Forecasted 2020 and 2035 emissions were estimated based on growth rates provided by the San Luis Obispo Council of Governments (SLOCOG). Communitywide BAU emissions would increase by approximately 9 percent in 2020 compared to 2005 levels, and would further increase by approximately 21 percent in 2035 compared to 2005 levels.

The CAP includes a communitywide GHG emissions reduction target of 15 percent below 2005 levels by 2020. This target can also be expressed as a 22 percent reduction below the projected BAU forecast by 2020, which takes into account anticipated growth in population, housing and employment and associated changes in the built environment. The CAP includes specific GHG reduction measures that are designed to achieve this target, in combination with state and federal legislative reductions. With incorporation of these requirements, communitywide emissions would be reduced to 16 percent below 2005 levels by the year 2020, exceeding the 15 percent target. As with the proposed LUCE Update, the
potential No Project Alternative development would be subject to consistency with the CAP requirements and impacts would remain less than significant.

The No Project Alternative would not implement proposed Circulation Element policies that would enhance transportation and circulation systems that would have reduced greenhouse gas emissions benefits, such as reducing vehicle delays; and increasing the use of transit, bicycle and pedestrian systems. This beneficial aspect of the proposed LUCE Update Project and would not be achieved if the No Project Alternative were to be implemented.

**Hazards and Hazardous Materials.** The No Project Alternative would result in fewer residential units than would occur if the proposed LUCE Update were to be implemented. A reduced amount of future residential development in the City would minimize the potential for impacts that may occur if future residents were to be exposed to hazardous materials. A reduction in future residential development in high fire hazard zones would reduce the potential for future wildfire-related impacts. The only new development area proposed within an identified high fire hazard zone (State Area Responsibility) is the Madonna at LOVR Specific Plan site. This area is accompanied by development parameters that direct development closer to Los Osos Valley Road and away from the steeper hillsides, where the fire hazard zone is located. However, the potential fire-related hazard impacts of the No Project Alternative would be reduced when compared to the less than significant impacts of the proposed LUCE Update Project because no new development areas would occur near a high fire hazard zone. Although the potential for hazard-related impacts would be reduced by the No Project Alternative, future development under this alternative would also have the potential to be adversely affected by hazard- and hazardous material-related impacts. Future development under this alternative would be required to be consistent with 1994 Land Use Element policies, comply with hazard reduction and avoidance regulations, and may also be required to implement mitigation measures identified by project-specific environmental reviews to reduce project-related hazard and hazardous material impacts to a less than significant level.

**Hydrology and Water Quality.** The No Project Alternative would reduce future development of new urban uses in areas located within a designated 100-year floodplain. This includes portions of the Madonna on LOVR specific plan, and LOVR Creekside special planning area. Therefore, the No Project Alternative would have reduced flooding-related impacts when compared to the less than significant impacts of the proposed Project. The No Project Alternative would also reduce the potential for future drainage and water quality impacts that result from new development projects. Although the potential for hydrology and water quality impacts would be reduced by the No Project Alternative, future development under this alternative would also have the potential to be adversely affected by flooding impacts and could result in short- and long-term water quality impacts. Future development under this alternative would be required to be consistent with existing Land Use Element policies, comply with applicable regulations, and may also be required to implement mitigation measures identified by project-specific environmental reviews to reduce project-related impacts to a less than significant level.

**Land Use.** The No Project Alternative would reduce new development on the proposed Madonna on LOVR specific plan site; and would reduce the amount of future infill development in the City. By reducing the amount of future development, the potential for land use conflicts between proposed and existing land uses would be reduced. In addition, the No Project Alternative would lessen potential policy inconsistencies with the existing Airport Land Use Plan. Therefore, the No Project Alternative would have reduced land use impacts when compared to the significant impacts of the proposed LUCE Update Project. Although the No Project Alternative would reduce the potential for land use conflicts, future development under this alternative would also have the potential to result in significant land use conflict-related impacts. Future development that may occur under this alternative would be required to comply with applicable policies of the 1994 Land Use and Circulation Elements to minimize the potential for project-related land use conflicts.

If the No Project Alternative were to be implemented, proposed changes and additions to existing Land Use Element and Circulation Element policies would not be adopted. In many instances, the proposed new and revised policies clarify and update existing policy language and requirements. This beneficial aspect of the proposed LUCE Update Project would not be achieved if the No Project Alternative were to be implemented.

**Noise.** Short-Term Construction Noise Levels and Groundborn Vibration: Implementation of development projects under the proposed LUCE Update would involve construction that could result in temporary increases in noise levels and vibration primarily from the use of heavy-duty construction equipment. Based on modeling for typical construction activities, short-term construction-generated noise could exceed applicable standards for mobile construction equipment.
in the City’s Noise Control Ordinance. With implementation of conditional project requirements and City policy requirements, impacts related to short-term construction and associated vibration would be less than significant. The No Project Alternative would not preclude future development, as such; short-term construction impacts would be similar to those under the LUCE Update.

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 and could also result in the siting of new sensitive receptors in close proximity to transportation noise sources, with potential to exceed the land use compatibility and transportation noise exposure standards in the existing Noise Element. However, because the City’s existing 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 less than significant. The No Project Alternative would result in 9,780 fewer daily vehicle miles travelled when compared to the proposed LUCE Update Project, however, the No Project Alternative would not preclude future development. Long-term roadway traffic noise under the No Project Alternative would remain less than significant with the incorporation of the City’s noise policies.

It is also important to note that implementation of either the No Project Alternative or the LUCE Update would have the potential to introduce noise sensitive receptors to stationary noise sources. As with the LUCE Update, implementation of the No Project Alternative would remain less than significant with the incorporation of the City’s noise policies.

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. Although the proposed LUCE Update policies address airport noise compatibility and consistency with the adopted ALUP, proposed changes to this chapter of the Land Use Element primarily clarify policy language and provide updates to reflect current conditions. Because the San Luis Obispo County Regional Airport ALUP establishes noise compatibility policies for sensitive land uses within the projected 55 and 60 dBA CNEL airport noise contours associated with the hypothetical maximum use of both runways and restricts extremely noise sensitive land uses within the 60 dBA CNEL airport noise contour and requires mitigation measures for moderately sensitive land uses within the 60 dBA CNEL airport noise contour, impacts associated with the No Project Alternative would remain less than significant.

**Population and Housing.** As shown on Table 6.2-1, approximately 3,060 additional dwelling units could be developed in the city if the No Project Alternative were to be implemented. When added to the 20,697 dwelling units that existed in 2013, buildout of the No Project Alternative would result in approximately 23,757 residential units in the city, which would be approximately 1,844 fewer units than what is proposed by the Land Use Element Update. The number of residential units that could be provided in the City under the No Project Alternative would be consistent with Land Use Element Policy 1.10.2 (Residential Growth Rate), which limits residential unit growth in the city to an average of one percent per year. Therefore, similar to the proposed Project, the No Project Alternative would not result in residential unit development or associated population growth that exceeds an adopted growth rate threshold. It should be recognized that the No Project Alternative would provide 1,177 fewer multi-family residences than the proposed Project, which would have the potential to result in a substantial reduction in the number of affordable dwelling units in the City when compared to proposed Project.

**Public Services.** The No Project Alternative would result in less residential development than would occur if the proposed LUCE Update were to be implemented. The reduction in future residential development capacity would result in reduced demands for fire and law enforcement services, and could delay the need to develop a new fire station in the southern portion of the city. The reduction in dwelling units that would occur under the No Project Alternative would also reduce the number of additional school-age children in the city, which could avoid or delay the possible need to expand school capacity in the future. Therefore, the public service impacts of the No Project Alternative would be reduced when compared to the less than significant impacts of the proposed Project.

**Recreation.** The No Project Alternative would reduce the amount of future residential development in the city, resulting in a corresponding reduction in the demand for additional parkland. The proposed Land Use Element Update would provide 52.4 additional acres of parkland in the city and increase the residents/parkland ratio from of 3.32 acres to 3.44
acres for each 1,000 residents. If the No Project Alternative were to be implemented, a total of 44.1 acres of new parkland would be provided, and the population of the city would be increased to approximately 54,404 people, which would result in a city-wide parkland (195.75 acres) to 1,000 residents (54,404/1,000) ratio of 3.59. Therefore, similar to the proposed Project, the No Project Alternative would result in small increase in per capita parkland in the city when compared to the proposed Project. Also similar to the proposed Project, the No Project Alternative would not achieve consistency with the City’s per capita parkland standard of 10 acres of parkland for each 1,000 residents.

**Transportation and Circulation.** The No Project Alternative would result in fewer residential units and an increase in non-residential development when compared to the proposed LUCE Update Project. It is estimated that upon buildout, the proposed LUCE Update would result in approximately 1,356,310 daily vehicle miles travelled throughout the City and its sphere of influence. It is also estimated that under the No Project Alternative, approximately 1,346,530 daily vehicle miles would be travelled after the existing (1994) Land Use Element is built out. Therefore, the No Project Alternative would result in a reduction of 9,780 daily vehicle miles travelled when compared to the proposed Project. Impacts related to traffic generation would be incrementally reduced with the No Project Alternative when compared to the LUCE Update.

The proposed Circulation Element Update would make various transportation and circulation system modifications that would improve street system travel characteristics, and would also enhance the use of transit, bicycle and pedestrian modes of transportation. It is estimated that if the proposed Circulation Element street system modifications were implemented, approximately 5,100 daily vehicle hours of delay would occur in the city and its sphere of influence. It is also estimated that under the No Project Alternative, approximately 6,695 daily vehicle hours of delay would occur in the City and its sphere of influence. Therefore, the No Project Alternative would result in an increase of 1,595 daily hours of vehicle delay throughout the city and its sphere of influence when compared to the proposed Project. Impacts related to increased traffic congestion, such as Level of Service delays, would be incrementally increased with the No Project Alternative when compared to the LUCE Update.

**Utilities and Service Systems.** As shown on Table 6.2-1, approximately 3,060 additional dwelling units could be developed in the City if the No Project Alternative were to be implemented. When added to the 20,697 dwelling units that existed in 2013, buildout of the 1994 Land Use Element would result in approximately 23,757 units in the City, which would support a population of approximately 54,404 people. Buildout of the No Project Alternative would result in an annual water use of approximately 7,252 acre feet per year, which would be 563 acre feet less than the 7,815 acre feet that would be required for the buildout of the proposed Land Use Element.

Development potential under the 1994 Land Use Element and resulting wastewater generation is summarized below on Table 6.2-2. The No Project Alternative would result in additional wastewater flows of approximately 0.77 MGD, which is 0.20 MGD lower than the wastewater flows that would result from the proposed Land Use Element Update. The City’s WRRF has a dry weather flow capacity of 5.1 MGD, and currently receives flows of approximately 4.39 MGD. Therefore, the No Project Alternative would result in total future wastewater flows of approximately 5.16 MGD, which would incrementally exceed the capacity of the City’s WRRF. Although the No Project Alternative would exceed the existing treatment capacity of the WRRF, the impacts of this alternative are considered to be reduced when compared to the proposed Project due to the 0.20 MGD reduction in wastewater flows that would result.

The reduction in future residential units and the increase in non-residential development that would result from the implementation of the No Project Alternative would likely result in a similar amount of solid waste that requires landfill disposal when compared to the amount of solid waste that would be generated by the proposed Land Use Element Update Project.

Overall, the utility and service system impacts of the No Project Alternative would be reduced when compared to the less than significant impacts of the proposed LUCE Update Project.
Table 6.2-2  No Project Alternative: Wastewater Generation

<table>
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<tr>
<th>Land Use</th>
<th>No Project Alternative: 1994 Land Use Element Buildout Development Capacity</th>
<th>Wastewater Generation Factor (GPD) (1)</th>
<th>Wastewater Flow (GPD)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Single-Family (Units)</td>
<td>1,753</td>
<td>150/unit</td>
<td>262,950</td>
</tr>
<tr>
<td>Multi-Family (Units)</td>
<td>1,307</td>
<td>105/unit</td>
<td>137,235</td>
</tr>
<tr>
<td>Office (sq. ft.)</td>
<td>3,606,895</td>
<td>54/1,000 sq. ft.</td>
<td>194,772</td>
</tr>
<tr>
<td>Commercial (sq. ft.)</td>
<td>1,888,566</td>
<td>60/1,000 sq. ft.</td>
<td>113,314</td>
</tr>
<tr>
<td>Industrial (sq. ft.)</td>
<td>920,357</td>
<td>54/1,000 sq. ft.</td>
<td>49,699</td>
</tr>
<tr>
<td>Hotel (Rooms)</td>
<td>150</td>
<td>105/room</td>
<td>15,750</td>
</tr>
<tr>
<td><strong>Total Wastewater Flow (GPD)</strong></td>
<td></td>
<td></td>
<td><strong>773,720</strong></td>
</tr>
<tr>
<td><strong>Total Wastewater Flow (MGD)</strong></td>
<td></td>
<td></td>
<td><strong>0.77</strong></td>
</tr>
</tbody>
</table>

6.3 Reduced Development Alternative

This alternative evaluates environmental conditions that would result if the residential and non-residential development capacity of the proposed Land Use Element Update were to be reduced. This alternative would only reduce development identified by the Land Use Update related to the proposed specific and area plans, and special planning areas. The Reduced Development Alternative would not reduce planned development associated with existing specific plans, planned and approved projects, or other vacant land in the city. Assumptions used to identify reductions in the amount of development capacity identified by the Land Use Element are described below.

Residential Uses

The proposed Land Use Element would facilitate the development of 2,316 additional dwelling units in the city, including 412 units in the proposed special planning areas, 1,315 units in the proposed specific plan areas, and 589 units proposed by the South Broad Street Area Plan. Project Description Table 2.4-1 (Proposed Specific Plan Area Development Parameters), depicts the range of residential unit development capacity considered for each of the three proposed specific plans (San Luis Ranch, Madonna on LOVR, and Avila Ranch). The table indicates that a maximum total of 1,450 residential units and a minimum total of 1,050 units could be developed on the three specific plan areas. The three proposed specific plans would provide a total of approximately 1,315 residential units, which would be within the range of new unit development (1,050-1,450) indicated by Table 2.4-1.

For the analysis of the Reduced Development Alternative, it was assumed that the proposed specific plans would provide the minimum number of units identified on Table 2.4-1, which would reduce the number of proposed specific plan residential units from 1,315 to 1,050. This would reduce the proposed number of specific plan residential units by approximately 20 percent. For this alternative, the number of proposed residential units associated with each of the proposed specific plans was reduced by approximately 20 percent, resulting in an alternative development capacity of 400 units for the San Luis Ranch Specific Plan, 560 units for the Avila Ranch Specific Plan, and 90 units for the Madonna on LOVR Specific Plan. A similar 20 percent reduction in units has been applied to the proposed special planning areas and the South Broad Street Area Plan. Table 6.3-1 provides a summary of the number and type (single-family and multi-family) of residential units that could be developed under the Reduced Development Alternative.

Non-Residential Uses

The proposed Land Use Element would facilitate the development of approximately 1.99 million additional square feet of non-residential uses in the city, including approximately 0.93 million square feet in the proposed special planning areas; 0.83 million square feet in the proposed specific plan areas (approximately 0.71 million square feet of office and commercial uses, and approximately 120,000 square feet of hotel uses); and 0.23 million square feet proposed by the
South Broad Street Area Plan. Project Description Table 2.4-1 (Proposed Specific Plan Area Development Parameters), presents the range of non-residential unit development capacity considered for three proposed specific plan areas. The table indicates that exclusive of hotel-related square footage, a maximum total of 0.72 million square feet of non-residential uses and a minimum total of 0.31 million square feet of non-residential uses could be developed in the three specific plan areas. As indicated above, the proposed specific plans would provide a total of approximately 0.71 million square feet on non-residential uses (excluding hotels), which would be near the upper end of the proposed specific plan non-residential development capacity (0.72 million square feet) specified by Table 2.4-1.

The range of non-residential square footage considered for the proposed specific plan areas, as depicted on Table 2.4-1, is extensive (0.31 to 0.72 million square feet). If the Reduced Development Alternative were to reduce the amount of non-residential square footage proposed by the Land Use Element commensurate with the proposed versus minimum amount of development indicated by Table 2.4-1, as was done with residential units, the Reduced Project Alternative would reduce the total amount of non-residential square footage proposed by the Land Use Element Update by over 50 percent. Such a reduction would have the potential to result in an adverse imbalance (i.e., insufficient local services) to serve future residential and non-residential uses. To retain a balance between residential and non-residential land uses, the Reduced Development Alternative has assumed that the non-residential uses proposed by the Land Use Element Update would be reduced by 20 percent, commensurate with the reduction in residential units described above.

Table 6.3-1 depicts the amount of non-residential development that could be provided under the Reduced Development Alternative. In summary, this alternative would facilitate the development of approximately 4.68 million additional square feet of non-residential uses in the city, which would be a reduction of approximately 0.40 million square feet when compared to the non-residential development capacity of the proposed Land Use Element.

**Aesthetics.** The Reduced Development Alternative would decrease the amount of development in the proposed San Luis Ranch, Madonna on LOVR, and Avila Ranch specific plan areas; in the South Broad Street Area Plan; and would reduce the amount of infill development in the City when compared to the proposed Project. By reducing the amount of future development, potential aesthetic impacts that would result from development in the open space areas at the proposed specific plan sites would be decreased but not avoided. The potential for future aesthetic conflicts between existing and proposed uses at infill sites would also be decreased, as well as the potential for future lighting-related impacts. The reduced amount of development could have the potential to decrease aesthetic impacts by providing increased development setbacks and/or reduced building heights. Therefore, the Reduced Development Alternative would have less aesthetic impacts when compared to the less than significant impacts of the proposed Project. Although the amount of development would be reduced, future development under this alternative could have the potential to result in significant aesthetic impacts and would be required to comply with applicable policies of the proposed LUCE Update. New projects may also be required to implement mitigation measures identified by project-specific environmental reviews to reduce project-related aesthetic impacts to a less than significant level.

**Agricultural Resources.** The Reduced Development Alternative would reduce the amount of future development in the city; however, new urban development would still occur at mostly vacant sites such as the three proposed specific plan areas. Therefore, the conversion of prime agricultural soils impacts of this alternative would be similar to the impacts of the proposed Project. The Reduced Development Alternative could minimize the potential for conflicts between agricultural operations and adjacent urban uses if the reduction in future development facilitated increased separation distances between new urban uses and adjacent farming areas. Overall, however, the Reduced Development Alternative would have agricultural resources impacts that are similar to the less than significant impacts of the proposed Project.
Table 6.3-1  Reduced Development Alternative: Development Capacity within the Planning Subarea

<table>
<thead>
<tr>
<th>Element</th>
<th>Dwelling Units</th>
<th>Population</th>
<th>Non-Residential Square Footage</th>
<th>Total (includes hotels)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Single-Family</td>
<td>Multi-family</td>
<td>Total</td>
<td></td>
</tr>
<tr>
<td>Reduced Development</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Alternative:</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Development Capacity</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(1) Proposed</td>
<td>7</td>
<td>322</td>
<td>329</td>
<td>753</td>
</tr>
<tr>
<td>Special Planning Areas</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Proposed Specific</td>
<td>580</td>
<td>943</td>
<td>1,523</td>
<td>3,488</td>
</tr>
<tr>
<td>and Area Plans</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Subtotal</td>
<td>587</td>
<td>1,265</td>
<td>1,852</td>
<td>4,241</td>
</tr>
<tr>
<td>Reduced Development</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Alternative:</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total Land Use Element</td>
<td>2,273</td>
<td>2,167</td>
<td>4,440</td>
<td>10,167</td>
</tr>
<tr>
<td>Buildout Development</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Capacity (2)</td>
<td>1,782,767</td>
<td>991,854</td>
<td>892,479</td>
<td>52.4</td>
</tr>
</tbody>
</table>

(1) Residential and non-residential development capacity of the proposed specific plans, South Broad Street Area Plan, and special planning areas is reduced 20 percent compared to the development capacity identified by the proposed Land Use Element.

(2) Total Land Use Element buildout capacity includes development proposed by the Land Use Element Update plus additional development that may occur on the existing specific plant sites, planned and approved projects, and other vacant land in the city.
**Air Quality.** The Reduced Development Alternative would result in less residential and non-residential development, and would result in fewer annual vehicle miles travelled when compared to the proposed Project. The reduction in future development that would result from the implementation of the Reduced Development Alternative would result in reduced short-term construction and long-term vehicle and stationary emissions. Therefore, the air quality emissions and impacts of the Reduced Development Alternative would be decreased when compared to the emissions and impacts of the proposed Project. However, similar to the proposed Project, the total long-term emissions from additional development that may occur under this alternative would exceed adopted emission significance thresholds and impacts would remain significant and unavoidable.

**Biological Resources.** The Reduced Development Alternative would decrease the amount of residential and non-residential development in the proposed specific plan areas; the South Broad Street Area Plan; and the amount of infill development in the City when compared to the proposed Project. By reducing the amount of future development, the potential for impacts to common habitats, plant and animal species of local concern, special status plants and animals, and sensitive habitats may be minimized. Potential impacts to biological resources may be reduced by this alternative because a decrease in the amount of development at future project sites may facilitate the avoidance of sensitive areas and/or by providing increased development setbacks from sensitive resources. Therefore, the Reduced Development Alternative would have decreased impacts to biological resources when compared to the less than significant impacts of the proposed Project. Although the potential for biology-related impacts could be decreased by the Reduced Development Alternative, future development under this alternative could result in significant impacts and would be required to comply with applicable policies of the proposed Land Use Element Update and other applicable City policies. Future development projects may also be required to implement mitigation measures identified by project-specific environmental reviews to reduce project-related impacts to biological resources to a less than significant level.

**Cultural Resources.** A reduction in the amount of development proposed by the Land Use Element Update may reduce the potential for impacts to archaeological resources, as a reduction in future construction activities could reduce the potential for impacts to previously undetected archaeological resources. Potential impacts to historical resources located on or near future development sites may also be reduced. Therefore, the potential cultural resources impacts of the Reduced Development Alternative would be somewhat decreased when compared to the less than significant impacts of the proposed Project. The Reduced Development Alternative would not eliminate the potential for future impacts to cultural resources, and similar to the proposed Project, implementation of existing and proposed Land Use Element policies, along with the implementation of applicable resource protection and environmental review requirements, would be required to reduce potential future impacts to a less than significant level.

**Geology and Soils.** A reduction in the amount of development proposed by the Land Use Element Update would decrease future construction-related erosion and sedimentation impacts, and the potential for long-term impacts from geologic hazards may also be decreased. Therefore, the geology and soils impacts of the Reduced Development Alternative would be reduced when compared to the less than significant impacts of the proposed Project. However, similar to the proposed Project, the development of new land uses under this alternative would still have the potential to result in significant geology- and soils-related impacts. It is anticipated that these potential impacts could be reduced to a less than significant level through the implementation of general plan policy requirements, building code requirements, and mitigation measures identified by project-specific environmental reviews.

**Global Climate Change.** The Reduced Development Alternative would result in less residential and non-residential development than would occur if the proposed Project were to be implemented, which would decrease annual vehicle miles travelled when compared to the proposed Project. The reduction in development would decrease future short- and long-term emissions of greenhouse gases from mobile and stationary sources. In addition, The CAP includes specific GHG reduction measures that are designed to achieve targeted emission reductions, in combination with state and federal legislative reductions. With incorporation of these requirements, communitywide emissions would be reduced to 16 percent below 2005 levels by the year 2020, exceeding the 15 percent target. As with the proposed LUCE Update, the potential Reduced Development Alternative development would be subject to consistency with the CAP requirements and impacts would remain less than significant.

**Hazards and Hazardous Materials.** The decreased amount of future urban development in the city that would result from the Reduced Development Alternative would minimize the potential for impacts that may occur if future residents or
building occupants were to be exposed to hazardous materials. A reduction in future urban development in high fire hazard zones may also reduce the potential for future wildfire-related impacts. Therefore, the potential hazards and hazardous material impacts of the Reduced Development Alternative would be reduced when compared to the less than significant impacts of the proposed Project. Although the potential for hazard-related impacts would be reduced by the Reduced Development Alternative, future development under this alternative would also have the potential to be adversely affected by hazard- and hazardous material-related impacts. Future development under this alternative would be required to be consistent with existing and proposed Land Use Element policies, comply with hazard reduction and avoidance regulations, and may also be required to implement mitigation measures identified by project-specific environmental reviews to reduce project-related hazard and hazardous material impacts to a less than significant level.

**Hydrology and Water Quality.** The Reduced Development Alternative would decrease the amount of future development in areas located within designated 100-year floodplain areas. These areas include portions of the San Luis Ranch, Madonna on LOVR, and Avila Ranch specific plan areas; and the Caltrans, Calle Joaquin Auto Sales, and LOVR Creekside special planning areas. Therefore, the Reduced Development Alternative would have decreased flooding-related impacts when compared to the less than significant impacts of the proposed Project. The Reduced Development Alternative would also decrease the potential for future drainage and water quality impacts that result from new development projects. Although the potential for hydrology and water quality impacts would be reduced by the Reduced Development Alternative, future development under this alternative would also have the potential to result in significant flooding and water quality impacts. Future development under this alternative would be required to be consistent with existing and proposed Land Use Element policies, comply with flooding hazard reduction and water quality regulations, and may also be required to implement mitigation measures identified by project-specific environmental reviews to reduce project-related impacts to a less than significant level.

**Land Use.** The Reduced Development Alternative would decrease the amount of new development proposed for San Luis Ranch, Madonna on LOVR, and Avila Ranch specific plan sites; the South Broad Street Area Plan site; and would decrease the amount of future infill development in the City. By decreasing the amount of future development, the potential for land use conflicts between proposed and existing land uses would be reduced. In addition, the Reduced Project Alternative could lessen potential policy inconsistencies with the existing Airport Land Use Plan. The potential for future land use conflicts could be decreased by facilitating increased setbacks between new and existing uses, decreased building heights, and a reduction in traffic-related impacts. Therefore, the Reduced Development Alternative would minimize the potential for future land use impacts when compared to the significant land use impacts of the proposed Project. Although the Reduced Development Alternative would decrease the potential for land use conflicts, future development under this alternative would also have the potential to result in significant land use conflict-related impacts. Future development that may occur under this alternative would be required to comply with applicable general plan policies to minimize the potential for project-related land use conflicts.

**Noise.** Short-Term Construction Noise Levels and Groundborn Vibration: Implementation of development projects under the proposed LUCE Update would involve construction that could result in temporary increases in noise levels and vibration primarily from the use of heavy-duty construction equipment. Based on modeling for typical construction activities, short-term construction-generated noise could exceed applicable standards for mobile construction equipment in the City’s Noise Control Ordinance. With implementation of conditional project requirements and City policy requirements, impacts related to short term construction and associated vibration would be less than significant. The Reduced Development Alternative would result in a reduction in future development, as such; short-term construction impacts would be incrementally reduced compared to those under the LUCE Update.

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 and could also result in the siting of new sensitive receptors in close proximity to transportation noise sources, with potential to exceed the land use compatibility and transportation noise exposure standards in the existing Noise Element. However, because the City’s existing 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 less than significant. The Reduced Development Alternative would result in fewer daily vehicle miles travelled when compared to
the proposed LUCE Update Project. Long-term roadway traffic noise under the Reduced Development Alternative would remain less than significant with the incorporation of the City’s noise policies.

It is also important to note that implementation of either the Reduced Project Alternative or the LUCE Update would have the potential to introduce noise sensitive receptors to stationary noise sources. As with the LUCE Update, implementation of the Reduced Development Alternative would remain less than significant with the incorporation of the City’s noise policies.

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. Although the proposed LUCE Update policies address airport noise compatibility and consistency with the adopted ALUP, proposed changes to this chapter of the Land Use Element primarily clarify policy language and provide updates to reflect current conditions. Because the San Luis Obispo County Regional Airport ALUP establishes noise compatibility policies for sensitive land uses within the projected 55 and 60 dBA CNEL airport noise contours associated with the hypothetical maximum use of both runways and restricts extremely noise sensitive land uses within the 60 dBA CNEL airport noise contour and requires mitigation measures for moderately sensitive land uses within the 60 dBA CNEL airport noise contour, impacts associated with the Reduced Development Alternative would remain less than significant.

Population and Housing. As shown on Table 6.3-1, the Reduced Development Alternative would facilitate the construction of approximately 4,440 additional dwelling units in the city, which would be a decrease of approximately 464 units when compared to the 4,904 additional units that would be facilitated by the proposed Project. When added to the 20,697 dwelling units that existed in the city in 2013, buildout of the Reduced Development Alternative would result in approximately 25,137 residential units in the city. The number of residential units that could be provided under the Reduced Development Alternative would be consistent with Land Use Element Policy 1.10.2 (Residential Growth Rate), which limits residential unit growth in the city to an average of one percent per year. Therefore, similar to the proposed Project, the Reduced Development Alternative not result in residential unit development or associated population growth that exceeds an adopted growth rate threshold. It should be recognized that the Reduced Development Alternative would provide 317 fewer multi-family residences than the proposed Project, which would have the potential to result in a fewer affordable dwelling units in the City when compared to proposed Project.

Public Services. The Reduced Development Alternative would result in less residential and non-residential development than would occur if the proposed LUCE Update were to be implemented, which would result in reduced demands for fire and law enforcement services. However, development in the southern portion of the city that could occur under this alternative would still require that a new fire station be constructed to comply with the Fire Department’s four-minute travel time standard. The reduction in dwelling units that would occur if the Reduced Development Alternative were to be implemented would also reduce the number of additional school-age children in the city, but may not avoid the possible need to expand school capacity in the future. Therefore, the public service impacts of the Reduced Development Alternative would generally be similar to the less than significant public service impacts of the Proposed LUCE Update Project.

Recreation. The Reduced Development Alternative would decrease the amount of new residential development in the City when compared to the proposed Project, which would result in a corresponding decrease in the demand for additional parkland. Reducing the amount of residential and non-residential development could also increase the amount of land area available to provide new park facilities, but decrease the development available to pay or dedicate the land. Therefore, similar to the proposed Project, the Reduced Development Alternative would result in a small increase in per capita parkland in the city when compared to the proposed Project. Also similar to the proposed Project, the Reduced Development Alternative would not achieve consistency with the City’s per capita parkland standard of providing 10 acres of parkland for each 1,000 residents.

Transportation and Circulation. Buildout of the Reduced Development Alternative would result in 464 fewer residential units and an approximately 0.40 million square foot reduction in non-residential development capacity when compared to the proposed Project. The reduction in residential and non-residential development would reduce the number of average daily vehicle trips in the city when compared to the proposed project, which would have the potential to result in fewer traffic-related impacts.
Utilities and Service Systems. As shown on Table 6.3-1, approximately 4,440 additional dwelling units could be developed in the city if the Reduced Development Alternative were to be implemented. When added to the 20,697 dwelling units that existed in 2013, buildout of the Reduced Development Alternative would result in approximately 25,137 units in the City, which would support a population of approximately 57,564 people. Buildout of the Reduced Development Alternative would result in an annual water use of approximately 7,673 acre feet per year, which would be 142 acre feet less than the 7,815 acre feet that would be required for the buildout of the proposed Land Use Element.

The development capacity potential and resulting wastewater generation characteristics of the Reduced Development Alternative are summarized below on Table 6.3-2. Buildout of the Reduced Development Alternative would result in additional wastewater flows of approximately 0.84 MGD, which is 0.13 MGD lower than the wastewater flows that would result from buildout of the proposed Project. The City’s WRRF has a dry weather flow capacity of 5.1 MGD, and currently receives flows of approximately 4.39 MGD. Therefore, the Reduced Development Alternative would result in total future wastewater flows of approximately 5.23 MGD, which would exceed the capacity of the City’s WRRF by approximately 0.13 MGD.

The reduction in future residential and non-residential development that would result from the implementation of the Reduced Development Alternative would decrease the amount of solid waste that requires landfill disposal when compared to the amount of solid waste that would be generated by the proposed Land Use Element Update Project.

Overall, the Reduced Development Alternative would result in beneficial decreases in water use, waste water generation and solid waste disposal when compared to the less than significant impacts of the proposed LUCE Update Project. However, the reductions in water use and solid waste disposal would be relatively minor, and an expansion of the City’s WRRF would still be required. Therefore, the utility and service system impacts of the Reduced Development Alternative would only be slightly reduced when compared to the impacts of the proposed Project.

<table>
<thead>
<tr>
<th>Land Use</th>
<th>Reduced Development Alternative: General Plan Buildout Development Capacity</th>
<th>Wastewater Generation Factor (GPD) (1)</th>
<th>Wastewater Flow (GPD)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Single-Family (Units)</td>
<td>2,273</td>
<td>150/unit</td>
<td>340,950</td>
</tr>
<tr>
<td>Multi-Family (Units)</td>
<td>2,167</td>
<td>105/unit</td>
<td>227,535</td>
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<tr>
<td>Office (sq. ft.)</td>
<td>1,782,767</td>
<td>54/1,000 sq. ft.</td>
<td>96,269</td>
</tr>
<tr>
<td>Commercial (sq. ft.)</td>
<td>991,854</td>
<td>60/1,000 sq. ft.</td>
<td>59,511</td>
</tr>
<tr>
<td>Industrial (sq. ft.)</td>
<td>892,479</td>
<td>54/1,000 sq. ft.</td>
<td>48,193</td>
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<tr>
<td>Hotel (Rooms)</td>
<td>677</td>
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<td>71,085</td>
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<td><strong>Total Wastewater Flow (GPD)</strong></td>
<td></td>
<td></td>
<td><strong>843,543</strong></td>
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<tr>
<td><strong>Total Wastewater Flow (MGD)</strong></td>
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<td><strong>0.84</strong></td>
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</table>

6.4 Maximum Circulation Improvements Alternative

This alternative evaluates the environmental conditions that would result if three additional street system modifications were added to the proposed LUCE Update. The three additional street system modifications that would be added to the proposed update of the Circulation Element are described below.

Buckley Road From Higuera to Los Osos Valley Road Connection

Buckley Road is located in the southern portion of the city and extends between Vachell Lane to the west and Edna Road/Broad Street to the east. The existing General Plan envisions the extension of Buckley Road westward from its intersection with Vachell Lane to intersect with South Higuera Street at a location south of and adjacent to the Octagon...
Barn. The Maximum Circulation Improvement alternative builds on this connection by further extending the road northward to intersect with Los Osos Valley Road. The eastern segment (currently in the GP) of the Buckley Road extension would be located on land that is in agricultural production. The western segment of the roadway extension would be located on agricultural land and on the Los Osos Valley Road Creekside special planning area, and would be west of and adjacent to a residential neighborhood, and east of and adjacent to the confluence of San Luis Obispo and Prefumo Creeks.

**Vachell Lane Realignment**

Vachell Lane is located in the southern portion of the city and extends between Buckley Road to South Higuera Street. Vachell Lane currently intersects with South Higuera Street approximately one-tenth of a mile north of the South Higuera Street/Los Osos Valley Road intersection. This street system modification would realign Vachell Lane so that it would intersect with the existing South Higuera Street/Los Osos Valley Road intersection. The realigned portion of Vachell Lane would require the demolition/reconstruction of an existing industrial development.

**Calle Joaquin Connection to Dalidio Drive**

Calle Joaquin is in the southern portion of the city and is generally parallel to the northern side of U.S. 101. The northern end of the existing road dead-ends on the proposed San Luis Ranch Specific Plan site. This street system modification would extend Calle Joaquin northward approximately 0.6 of a mile to connect with Dalidio Drive, which currently dead-ends along the northern edge of the San Luis Ranch Specific Plan site.

**Aesthetics.** The Buckley Road and Calle Joaquin roadway extensions would be located in areas that are currently open space, and their development would have the potential to result in potentially significant aesthetic and lighting impacts. Portions of the Buckley Road extension would be located on the Los Osos Valley Road Creekside special planning area, and the Calle Joaquin extension would be located almost entirely on the San Luis Ranch Specific Plan site. Due to their locations on proposed development areas and proximity to other previously developed areas, the Buckley and Calle Joaquin alternative roadway modifications would not substantially increase the potential for aesthetic impacts when compared to the impacts of the proposed Project. The Vachell Lane realignment would be located in an existing industrial area and would not result in a significant aesthetic impact. Therefore, the aesthetic impacts of the Maximum Circulation Improvements Alternative would be similar to the impacts of the proposed Project.

**Agricultural Resources.** The Buckley Road and Calle Joaquin roadway extensions would be located in areas that are currently in agricultural production. The Buckley Road extension would be partially located on the Los Osos Valley Road Creekside special planning area; however, the road would extend across an existing agricultural area located south of the special planning area. By traversing an area in agricultural production, the viability of the existing agricultural operation would be substantially reduced. Therefore, the Buckley Road extension would have impacts to agricultural resources that are increased when compared to the impacts of the proposed Project. The Calle Joaquin extension would be located mostly on the San Luis Ranch Specific Plan site. Due to its location on a proposed specific plan site, the impacts to agricultural operations resulting from the Calle Joaquin extension would be similar to the impacts of the proposed project, which would remove the San Luis Ranch Specific Plan area from agricultural production. However, should the Calle Joaquin extension be developed and the San Luis Ranch Specific Plan remain in agricultural production, the alternative road extension would have the potential to result in impacts to agricultural operations that are greater than the impacts of the proposed Project. The Vachell Lane realignment would be located in an existing industrial area and would not adversely affect agricultural resources. Overall, the agricultural resource impacts of the Maximum Circulation Improvements Alternative would be greater than the impacts of the proposed Project.

**Air Quality.** It is estimated that upon buildout, the proposed LUCE Update Project would result in approximately 1,356,310 daily vehicle miles travelled throughout the City and its sphere of influence. It is also estimated that upon buildout of the Maximum Circulation Improvements Alternative, approximately 1,344,440 daily vehicle miles would be travelled throughout the City and its sphere of influence. Therefore, the Maximum Circulation Improvements Alternative would result in a reduction of 11,870 daily vehicle miles travelled when compared to the proposed Project.

The proposed Circulation Element Update would make various transportation and circulation system modifications that would improve street system travel characteristics, and would also enhance the use of transit, bicycle and pedestrian modes of transportation. It is estimated that if the proposed Circulation Element street network modifications were
implemented, approximately 5,100 daily vehicle hours of delay would occur in the City and its sphere of influence. It is also estimated that under the Maximum Circulation Improvements Alternative, approximately 4,735 daily vehicle hours of delay would occur in the City and its sphere of influence. Therefore, the Maximum Circulation Improvements Alternative would result in a daily decrease of 365 hours of vehicle delay when compared to the proposed Project.

The Maximum Circulation Improvements Alternative would result in an incremental increase in short-term construction emissions when compared to the construction-related emissions that would result from the implementation of the proposed Circulation Element. However, due to the long-term reduction in vehicle miles travelled and hours of delay that would be achieved by this alternative, the Maximum Circulation Improvements Alternative would have reduced air quality impacts when compared to the air quality impacts of the proposed Project.

**Biological Resources.** The western segment of the Buckley Road extension would be located near San Luis Obispo Creek and Prefumo Creek. This road segment is currently part of the City’s General Plan; however its construction as part of this alternative would have the potential to result in significant impacts to biological resources located in or near the creeks. The Buckley Road extension from Higuera to Los Osos Valley Road would impact areas adjacent to the creek and although part of the road would be located on the Los Osos Valley Road Creekside special planning area, there would be new impacts to the riparian area between the Creekside planning area and South Higuera. Therefore, the potential impacts of this street system modification would greater than the impacts of the proposed Project. The Calle Joaquin road extension would be located mostly on the San Luis Ranch Specific Plan site, which is currently in agricultural production. The potential for the Calle Joaquin roadway extension to result in significant impacts to biological resources would be similar to the impacts of the proposed Project. The Vachell Lane realignment would be located in an existing industrial area and would not adversely affect biological resources. Therefore, the biological resource impacts of the Maximum Circulation Improvements Alternative would be greater than the impacts of the proposed Project.

**Cultural Resources.** The Buckley Road extension would be located on undeveloped land that could have the potential to contain previously undetected archaeological resources. A portion of the road extension would be on the Los Osos Valley Road Creekside special planning area, however, the remainder of the road extension would be located in areas where no new development has been proposed. The Buckley Road extension would also be located adjacent to the historic Octogonl Barn. Therefore, the Buckley Road extension would have an increased potential to result in impacts to archaeological and historical resources when compared to the cultural resource impacts of the proposed project. The Calle Joaquin road extension would be located entirely on the San Luis Ranch Specific Plan site, therefore, the potential for this road extension to result in impacts to cultural resources would be similar to the impacts of the proposed project. The Vachell Lane realignment would be located in a previously developed area and would not result in a significant impact to cultural resources.

**Geology and Soils.** The western portion of the Buckley Road extension would be located adjacent to San Luis Obispo and Prefumo Creeks and would have the potential to result in significant construction-related erosion and sedimentation impacts. The Calle Joaquin extension and Vachell Lane realignment could also result in short-term construction impacts. Similar to the proposed project, the construction-related impacts of the Maximum Circulation Improvements Alternative could be reduced to a less than significant level. The alternative street system modifications would not increase the population of the City and would not expose additional people to geologic hazards. Therefore, the geology and soils impacts of the Maximum Circulation Improvements Alternative would be similar to the less than significant impacts of the proposed Project.

**Global Climate Change.** It is estimated that upon buildout, the proposed LUCE Update would result in approximately 1,356,310 daily vehicle miles travelled and approximately 5,100 daily vehicle hours of delay throughout the City and its sphere of influence. It is also estimated that upon buildout of the Maximum Circulation Improvements Alternative, approximately 1,344,440 daily vehicle miles would be travelled and approximately 4,735 daily vehicle hours of delay would occur throughout the city and its sphere of influence. Therefore, the Maximum Circulation Improvements Alternative would result in a reduction of 11,870 daily vehicle miles travelled and 365 hours of vehicle delay when compared to the proposed Project. Due to the reduction in vehicle miles travelled and hours of delay under buildout conditions, the Maximum Circulation Improvements Alternative would have reduced greenhouse gas emission impacts when compared to the impacts of the proposed Project.
6.0 Alternatives

Hazards and Hazardous Materials. The alternative street system modifications would not expose additional people in the city to hazardous materials, increase residential or non-residential uses in aircraft operation safety zones, or increase the potential for wildfire hazards. Therefore, the hazards and hazardous material impacts of the Maximum Circulation Improvements Alternative would be similar to the less than significant impacts of the proposed Project.

Hydrology and Water Quality. The Buckley Road and Calle Joaquin road extensions would be located within or near 100-year floodplain areas. These road extensions would not substantially increase existing flooding hazards, or expose people or houses to flooding-related impacts. Similar to the proposed project, potential construction-related water quality impacts of the alternative roadway modifications could be reduced to a less than significant level. The modified roadways would not be a substantial long-term source of water quality impacts. Therefore, the hydrology and water quality impacts of the Maximum Circulation Improvements Alternative would be similar to the less than significant impacts of the proposed Project.

Land Use. The alternative street system modifications would not increase or decrease the potential residential or non-residential development capacity identified by the proposed Project. Therefore, the land use impacts of the Maximum Circulation Improvements Alternative would be similar to the less than significant impacts of the proposed Project.

Noise. A portion of the western segment of the Buckley Road extension would be located in the proposed Los Osos Valley Road Creekside special planning area, and would also be west of and adjacent to a residential neighborhood. A substantial increase in traffic noise would have the potential to result in a significant environmental impact to the adjacent neighborhood; however, it is likely that noise control measures (i.e., road design to maximize setbacks from residential uses, berms, sound walls, etc.) could be incorporated into the design of the Los Osos Valley Road Creekside special planning area that would minimize noise impacts of the Buckley Road extension to nearby sensitive receptors. The Calle Joaquin road extension would be located on the San Luis Ranch Specific Plan, and it is anticipated that design measures would be incorporated into the design of the specific plan to reduce potential noise impacts to future residential uses on the specific plan site to a less than significant level. The Vachell Land realignment would be located in an industrial area and would not result in significant noise impacts. Overall, due to the potential noise impacts of the Buckley Road extension, the noise impacts of the Maximum Circulation Improvements Alternative would be increased when compared to the impacts of the proposed Project.

Population and Housing. The alternative street system modifications would not increase or decrease the potential residential or non-residential development capacity identified by the proposed Project. Therefore, the population and housing impacts of the Maximum Circulation Improvements Alternative would be similar to the less than significant impacts of the proposed Project.

Public Services. The alternative street system modifications would not increase or decrease the potential residential or non-residential development capacity identified by the proposed Project. Therefore, the public service demands of the Maximum Circulation Improvements Alternative would be similar to the less than significant impacts of the proposed Project.

Recreation. The alternative street system modifications would not increase or decrease the potential residential or non-residential development capacity identified by the proposed Project, and would not increase or decrease the amount of existing or planned parkland in the city. Therefore, the recreation impacts of the Maximum Circulation Improvements Alternative would be similar to the less than significant impacts of the proposed Project.

Transportation and Circulation. It is estimated that upon buildout, the proposed LUCE Update Project would result in approximately 1,356,310 daily vehicle miles travelled and approximately 5,100 daily vehicle hours of delay throughout the City and its sphere of influence. It is also estimated that upon buildout of the Maximum Circulation Improvements Alternative, approximately 1,344,440 daily vehicle miles would be travelled and approximately 4,735 daily vehicle hours of delay would occur throughout the City and its sphere of influence. Therefore, the Maximum Circulation Improvements Alternative would result in a reduction of 11,870 daily vehicle miles travelled and 365 hours of vehicle delay when compared to the proposed Project. These reductions occur due to the more efficient street system and circulation patterns that would be provided by the alternative street system modifications. Therefore, the Maximum Circulation Improvements Alternative would have reduced traffic and circulation impacts when compared to the impacts of the proposed Project.
Utilities and Service Systems. The alternative street system modifications would not increase or decrease the potential residential or non-residential development capacity identified by the proposed Project. Therefore, the utility and service system demands of the Maximum Circulation Improvements Alternative would be similar to the less than significant impacts of the proposed Project.

6.5 Environmentally Preferred Alternative

Each of the LUCE Update project alternatives are listed on Table 6.5-1, below. This table summarizes the potential for each of the evaluated alternatives to result in reduced, similar, or increased environmental impacts when compared to the respective impacts of the proposed Project. The table also indicates if an alternative would have reduced policy-related benefits or would be inconsistent with a general plan policy.

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 Land Use Element Update and has the potential to leave the city unable to meet capacity for future regional housing needs allocations. 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 in 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. This alternative would generally result in environmental impacts that are similar to the proposed Project, but would have reduced air quality, greenhouse gas emission, and traffic impacts. This alternative would also have the potential to result in increased cultural resource, biological resource and noise impacts along portions 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 area-wide environmental benefits associated with reductions in air emissions and improved traffic conditions, and would not impede the implementation of proposed Land Use and Circulation Element Update objectives. 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.
### Table 6.5-1 Alternative Impact Comparison Summary

<table>
<thead>
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<th>Environmental Issue Area and Project Objectives</th>
<th>Environmental Impact Comparison</th>
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<tr>
<td></td>
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<tr>
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<tr>
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</tr>
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<tr>
<td>Greenhouse Gas Emissions</td>
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<td>Hazards and Hazardous Materials</td>
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<td>Hydrology and Water Quality</td>
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</tr>
<tr>
<td>Land Use</td>
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</tr>
<tr>
<td>Noise</td>
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<tr>
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<td>Public Services</td>
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Please see the next page.
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Please see the next page.
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