5.0 ALTERNATIVES

5.1 INTRODUCTION

The California Environmental Quality Act (CEQA) Guidelines state 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" (Section 15126.6).

The CEQA Guidelines state that "the range of alternatives required in an EIR is governed by a rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the Lead Agency determines could feasibly attain most of the basic objectives of the Project (Section 15126.6).

In defining feasibility of alternatives, the CEQA Guidelines state that "among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site" (Section 15126.6).

The alternatives must adequately represent the spectrum of environmental concerns in order to permit a reasoned choice among alternatives. The document must also provide the rationale for selecting or defining the alternatives evaluated throughout the document, including the identification of alternatives that were considered by the Lead Agency but rejected as infeasible during the scoping process.

The alternatives analysis for this EIR is presented in four major parts. The first section describes the objectives of the Avila Ranch Development Project (Project). The second section summarizes the potentially *significant unavoidable* short- and long-term impacts of the Avila Ranch Development Project (Project) from information presented in Section 3.0, *Environmental Analysis and Mitigation Measures*. The third section discusses potential impacts under the Project alternatives. The final section concludes with the selection of an environmentally superior alternative, based on a Project configuration that results in the fewest significant impacts and feasibly attains most of the Project objectives.

5.2 PROJECT OBJECTIVES

The Applicant and City objectives of the Project are described in Section 2.5 and restated below:

1) Development of an economically feasible specific plan that is consistent with, and implements policies within the City's Land Use and Circulation Elements (LUCE) and Airport Area Specific Plan (AASP).

2) Establishment of a complete "linked" community with the inclusion of amenities such as neighborhood parks and commercial goods and services that can serve the neighborhood.

3) Provision of a variety of housing opportunities for a wide range of socioeconomic groups and affordability levels.

4) Provision of a well-connected open space network that includes the addition of community gardens, neighborhood parks, bicycle paths, pedestrian sidewalks, open space buffers, and spaces for recreational activities.

5) Establishment of an internal transportation and circulation network of collector and residential roads; Class I, II, and III bicycle paths; and pedestrian sidewalks that are integrated and enhance the regional transportation system.

6) Restoration of Tank Farm Creek with improvements to the riparian creek corridor and establishment of open space buffers.

7) Model sustainable development practices and design features and achieve compliance with Leadership in Energy and Environmental Design Neighborhood Development (LEED-ND) Silver standards and the County of San Luis Obispo's Emerald certification rating.

5.3 SUMMARY OF SIGNIFICANT AND UNAVOIDABLE IMPACTS

The Project would result in significant and unavoidable impacts to air quality, noise, public services, and transportation and traffic.

5.3.1 Air Quality

In the short term, the projected emissions for the Project were found to be above the established APCD Tier 1 quarterly thresholds for construction emissions of ROG, NO_x and $PM_{2.5}$. Implementation of MM AQ-1a and -1b would minimize construction-related air

quality impacts; however, this impact would remain significant and unavoidable, even after mitigation.

In the long term, air emission impacts from ROG + NO_x, PM_{10}, and $PM_{2.5}$ as a result of vehicle trips, natural gas energy emissions, and additional area source emissions associated with the Project would be significant and unavoidable. In accordance with the San Luis Obispo APCD's CEQA Air Quality Handbook, all standard mitigation measures and feasible discretionary mitigation measures would be incorporated into the Project (see MM AQ-2a and 2b). Even so, the residual impacts would remain above the significance threshold identified in Section 3.3 *Air Quality and Greenhouse Gas Emissions*.

The Project was also found to have significant and unavoidable impacts related to consistency with the County of San Luis Obispo APCD's 2001 Clean Air Plan. The design of the Project would require relatively substantial changes to reduce inconsistency with overall land use planning principles contained in the Clean Air Plan to less than significant. The Project could hinder the County's ability to maintain attainment of the state ozone standard because the emissions reductions projected in the Clean Air Plan may not be met. The anticipated population growth and increase in vehicle trips associated with the Project is inconsistent with the projections contained within the 2001 Clean Air Plan. Therefore, inconsistencies with assumptions in the Clean Air Plan would remain significant and unavoidable, even after implementation of MM AQ-2b and MM TRANS-12.

5.3.2 Noise

In the short term, even with implementation of MM NO-1a through MM NO-1c, construction-associated noise levels from equipment and vehicles would temporarily exceed City noise thresholds established in the City's General Plan Noise Element and Noise Guidebook for noise-sensitive residential uses approximately 100 feet from the Project site during grading and construction activities. Standard mitigation measures restricting hours of construction would minimize impacts; however, due to the location of sensitive land uses adjacent to the Project site, noise standards would be periodically exceeded and therefore significant and unavoidable.

5.3.3 Transportation and Traffic

Impacts to traffic and transportation upon implementation of the Project would consist of delays and/or exceedance of intersection capacities. More specifically, Project generated traffic would cause exceedance of intersection capacities at the Buckley Road/State Route (SR) 227 intersection, resulting in significant and unavoidable impacts. Although the

Project would implement MM TRANS-5 and the Applicant would pay a fair share fee to offset Project contributions to this impact, as no County or Caltrans program for improvements is currently adopted, impacts would be significant and unavoidable.

In addition, the Project would contribute to significant and unavoidable impacts related to near-term operational conditions for the Prado Road/South Higuera Street. Although MM TRANS-15a would apply, there currently are no feasible funded or scheduled programs for improvements to this intersection to reduce this impact to a less than significant level.

5.4 ALTERNATIVES ANALYSIS

This section discusses alternatives to the proposed project, including alternatives which were considered and discarded. Each of these considers the ability of a particular alternative to comply with the City's General Plan or substantially reduce or eliminate the project's significant environmental impacts, while still meeting basic project objectives. The EIR also includes a No Project Alternative and an analysis of possible alternative sites that may not have the same environmental resource sensitivity as the selected project site. These alternatives include:

- CEQA "No Project" Alternative A and B;
- Mitigated Project Alternative; and
- Business Park Alternative.

5.4.1 Alternatives Considered but Discarded

As discussed above, CEQA Section 15126.6(c) requires that an EIR disclose alternatives that were considered and discarded and provide a brief explanation as to why such alternatives were not fully considered in the EIR. In particular, as required by the State CEQA Guidelines, the selection of alternatives included a screening process to determine a reasonable range of alternatives, which could reduce significant effects but also feasibly meet project objectives. If an alternative does not clearly provide any environmental advantages compared to the proposed Project, meet key Project objectives, nor achieve overall agency policy goals, it is eliminated from further consideration. For the proposed Project, characteristics used to eliminate alternatives from further consideration include:

- Failure to meet basic Project objectives;
- Limited effectiveness in reducing Project environmental impacts;
- Inconsistency with City policies regarding jobs/housing balance and provision of a mix of housing types;
- Potential for inconsistency with adopted agency plans and policies; and

- Reasonableness of the alternative when compared to other alternatives under consideration.

The following alternatives were considered but eliminated from further analysis by the Lead Agency due to infeasibility or inconsistency with primary Project objectives.

5.4.1.1 Retention of Agricultural Uses Alternative

Under this alternative, the site would continue to be used for agricultural production, which could be facilitated by a possible rezone of the site to an agricultural zoning district and General Plan amendment to an agricultural land use designation. This alternative would entail continuation of ongoing agricultural uses. Under this alternative, ongoing agricultural water use would continue; Tank Farm Creek would not be restored; and no substantial new source of automobile trips would be generated with associated impacts to congestion, air pollutant, and greenhouse gas (GHG) emissions.

However, this alternative would be inconsistent with the 2014 LUCE performance standards for the Project site and would not meet any of the Project objectives, which include the provision of a variety of housing types and affordability. In addition, the City's 2014 LUCE reviewed agricultural resource issues and did not designate this site for agricultural uses, instead identifying standards to mitigate site development impacts upon agricultural resources. Further, retention of the site for agricultural uses would not meet identified housing needs and would be inconsistent with City goals to provide a mix of housing types and increase the City's housing stock for residents. Therefore, this option was considered and discarded, consistent with CEQA Guidelines Section 15126.6(c).

5.4.1.2 Increased Housing Development Alternative

Under this alternative, substantially more housing as well as the number of affordable units would be developed in the site in order to address concerns over housing shortages within the City, lack of affordable units, displacement of very low-income and extremely low-income households to areas outside the City, and the City's jobs/housing balance. This alternative would reduce the number of proposed low and medium density residential units and increase the amount of medium-high density and high density residential units to provide a net increase of workforce housing units as well as a greater number of affordable units for low and very low income households. Under this alternative, a minimum of 50 percent of areas designated for residential use would be developed with medium-high or high density residential uses. This change in land use would likely increase residential development potential to 1,000 to 1,200 units, with a higher percentage of affordable by

design housing than the proposed Project. With greater high density buildout, this alternative would reduce the extent of low density units, allowing for greater amounts of open space within the Project site.

However, the Project as proposed already includes a strong housing focus. A greater number of housing units, and associated residential population increase under this alternative would increase on- and offsite environmental impacts, such as those to air quality, public services, utilities, and transportation. In addition, this alternative would be inconsistent with the City's 2014 LUCE, substantially exceeding allowable residential development and potentially requiring a General Plan amendment. As such, this alternative was considered and discarded, consistent with CEQA Guidelines Section 15126.6(c).

5.4.1.3 Major Reduced Project Alternative

Under this alternative, half the amount of housing would be introduced to the Project site. Instead of 720 units, approximately 360 units would be developed. The neighborhood commercial area would likewise be reduced by half, proposing approximately 7,500 square feet (sf) of development. Setbacks along Tank Farm Creek would be at least 35 feet back from the riparian edge, which would be nearly double that of City policies. No realignment of the Creek would occur under this alternative, preserving the existing biological and hydrological conditions at the Project site.

This alternative would not be consistent with envisioned development densities of the LUCE, which prescribes a minimum of 500 residential units and 15,000 sf of business development. While benefits would include less trip generation to the Project site and reduced construction-related air quality and noise impacts, development to provide housing for the City would result in long-term, detrimental impacts to these resource areas via this alternative. Reducing the Project by a major proportion would severely limit its consistency with the LUCE policies and its intent for development within the site. This alternative would be inconsistent with the intent of the City's 2014 LUCE, given the promotion of increased housing stock would not be realized. Such a substantial reduction in residential density may potentially require a rezone and General Plan amendment. As such, this alternative was considered and discarded, consistent with CEQA Guidelines Section 15126.6(c).

5.4.1.4 Business Park Land Use Alternative

This alternative would include development of the entire site as a business park with supporting commercial development, as indicated in the current City zoning map. To be

consistent with the site's zoning for Business Park – Specific Plan (BP-SP), this alternative would result in development of business and commercial-oriented uses emphasizing employment growth. This alternative would not require a rezone from a potential business park area to a district containing residential uses and open space allowances through the center of the Project site.

However, this alternative would not meet the intent of the 2014 LUCE performance standards for the Project site and would not meet all of the Project objectives, including the provision of a variety of housing types and affordability. In addition, existing City land use designations are thought to provide sufficient business park and commercial development to extend through 2035, while lands such as the Project site are needed to meet identified housing needs. Therefore, this option was considered and discarded, consistent with CEQA Guidelines Section 15126.6(c).

5.4.2 Alternatives Carried Forward for Analysis

5.4.2.1 No Project Alternative

Under the No Project Alternative, the Project would not be approved. Under this alternative, the EIR reviews two possible outcomes.

A. No Development. One possible outcome is that the site would remain vacant for the foreseeable future. No development would occur, including the Buckley Road Extension (although this project has been identified by Caltrans within the Regional Transportation Plan and the updated LUCE as a potential project, subject to future funding and planning requirements). Under this version of the No Project Alternative, ongoing agricultural production would continue, with associated water use, application of pesticides and herbicides and other ongoing impacts (e.g., dust generation). Tank Farm Creek would not be restored and no substantial new source of new automobile trips would be generated with associated impacts to congestion, air pollutant and GHG emissions. Development of the site would not contribute to the City's housing supply, the potential for displacement of City residents would increase, and a greater jobs/housing imbalance would result.

B. General Plan Development. As stated in CEQA Guidelines Section 15126.6(e)(3)(A), "where failure to proceed with the Project will not result in preservation of existing environmental conditions, the analysis should identify a practical result of the Project's non-approval and not create and analyze a set of artificial assumptions that would be required to preserve the existing physical

environment." As such, another possible outcome of the No Project Alternative is development of the Project site in accordance with the 2014 LUCE.

The 2014 LUCE identifies the Project site as a Special Focus Area – SP-4, and contains guidelines for development for between 500 and 700 residential units, along with requirements for provision of 15,000 to 25,000 sf of commercial space and retention of large areas of open space (50 percent) for agricultural buffers, provision of parks and creek restoration. Buildout under this alternative compared to the Project would ultimately be very similar. This alternative considers the highest possible buildout scenario (700 residential units and 25,000 sf of commercial space) to evaluate a greater extent of area disturbed with higher densities and land use potential. Compared to the Project's proposed 720 units, residential units could be reduced between 20 and as much as 220 units compared to the Project. Similarly, the Project proposes up to 10,000 sf less potential commercial space than could be developed under this alternative, which would allow this alternative to generate much higher amounts of traffic to the Project site for commercial reasons. The Buckley Road Extension, as envisioned in the updated LUCE, would occur under this alternative. Lastly, it is assumed the realignment of the North-South Creek Segment of Tank Farm Creek would not occur.

Analysis – No Project Alternative A (No Development)

Under this version of the No Project Alternative (A), a number of direct environmental impacts would generally be reduced compared to the proposed Project, although less beneficial indirect and long-term impacts would occur to resource areas such as population and housing for the City. Impacts to aesthetics and visual resources, cultural resources, noise, public services, utilities, and impacts to and/or from hazards and hazardous materials would be less than the Project, due to the absence of construction activities and development on the Project site. Mitigation measures would not be necessary for these resource areas to avoid significant impacts under this alternative.

Agricultural Resources. This alternative would result in no impact to agricultural resources, as there would be no development on the existing 78.2 acres of prime soils and 71.8 acres of farmland of statewide importance, allowing for a continuation of agricultural operations.

Air Quality and GHG Emissions. Impacts to air quality and GHG emissions within the Project site and immediate vicinity would likewise be much less than the Project, as there

would be no significant construction emissions under this alternative. Continued dust generation from agricultural operations would contribute to air quality emissions; however, such emissions would be substantially less than significant construction and operational emissions produced by the Project. Further, as no new development would occur, this alternative would remain consistent with land uses and vehicle miles traveled within the 2001 Clean Air Plan.

Biological Resources. Within the Project site, impacts to biological resources would be negligible. Preservation of the existing wetland and riparian habitat and associated sensitive species within the Project site would occur under this alternative. Compared to the Project, no mitigation measures would be required to lessen the significance of impacts upon the site's biological resources.

Land Use. Impacts to land use would result in continued discrepancies between the existing agricultural uses and the LUCE intent for the area to provide a substantial amount of residential units, Neighborhood Commercial uses, and preserved open space. This alternative would result in less than significant impacts related to consistency with LUCE policies, Airport Land Use Plan (ALUP) policies, and Airport Overlay Zones (AOZ) as no development would occur that would result in potential airport safety hazards or conflict with policies relating to Tank Farm Creek and development on agricultural lands.

Population and Housing. Compared to the Project, this alternative would not result in beneficial impacts to the housing supply nor assist in meeting the City's RHNA housing allocation targets, and would not meet existing and future housing needs or increased affordable housing opportunities. There would continue to be a jobs/housing imbalance within the City as described in Section 3.10.2, *Environmental Setting* of Section 3.10, *Population and Housing*. The continuation of these existing conditions would ultimately require increased demand for housing to support employment opportunities and economic growth projected to occur within the City. As a result, increasing numbers of households may opt to find housing opportunities outside of the City, and would travel to job opportunities within the City, as further discussed in Section 3.10, *Population and Housing*. Indirect impacts caused by the jobs/housing imbalance within the City and associated commuter trips include increased energy consumption, GHG emissions, and air pollutant emissions from additional commuters and increased commute distances and times. As No Project Alternative A would not provide housing opportunities within the Project site, this alternative would not alleviate some of these direct and indirect impacts to population and housing.

Transportation and Traffic. Direct traffic and transportation impacts to the Project site would be much less than the Project under this alternative, as there would be no development that would generate additional trips to and from the Project site or on adjacent roadways. Therefore, the significant and unavoidable impacts caused by the Project would not occur under this alternative.

Analysis – No Project Alternative B (General Plan Development)

Under this version of the No Project Alternative (B), environmental impacts would be somewhat similar to the proposed Project. Impacts to aesthetics and visual resources, cultural resources, noise, population and housing, public services, utilities, and impacts to and/or from hazards and hazardous materials would be similar to the Project, due to a similar amount of buildout between the Project and this alternative. As such, significant and unavoidable impacts related to construction noise and air quality would remain significant under this alternative. Future development projects proposed for the Project site would be subject to further CEQA review; mitigation measures similar to the Project would be necessary for the relevant aforementioned resource areas to avoid significant impacts under this alternative. Overall, similar to the Project, No Project Alternative B could continue to result in potentially significant and unavoidable impacts to construction and operational air quality emissions, construction-related noise levels, and transportation and traffic impacts.

Agricultural Resources. Impacts to agricultural resources would be similar to the Project, as the site would be developed with nonagricultural uses resulting in the loss of similar quantities of prime agricultural soils. Since a majority of the prime soils within the Project site are located within the western region of the Project site, much of the prime soil would be lost to development. However, the prime soils located along the southern buffer and the small area along the eastern border would be preserved as no development would occur within the Urban Reserve Line (URL), consistent with the City's Land Use Policy 1.4 – Urban Edges Character.

Air Quality and GHG Emissions. Impacts to air quality and GHG emissions would be incrementally greater than the Project, as construction and long-term maximum buildout of residential and neighborhood commercial uses would result in an estimated increase of at least 1,091 ADT under this alternative compared to the Project, due to the increase in Neighborhood Commercial buildout. Associated air quality and GHG emissions from this alternative would increase, resulting in inconsistency with the Clean Air Plan thresholds and incrementally greater significant and unavoidable impacts than the Project.

Biological Resources. Impacts to biological resources within the North-South Creek Segment would be less severe than under the Project, as Tank Farm Creek would retain its existing alignment, which would avoid some construction-related impacts to biological resources and reduce the loss of wetland and riparian habitat compared to the Project. However, the Project includes mitigation measures and features that replant and/or replace habitat, and it is possible that such features may not be included in future development plans under this alternative; this would result in a greater adverse impact compared to the Project. Ultimately, adverse impacts to biological resources could occur from construction and operation within the Project site under this alternative.

Land Use. Since the alternative would result in a similar amount of development and result in similar land uses to the Project, a similar set of tract map approvals, architectural review, etc. would be necessary with this alternative's implementation, and result in similar land use and planning policy impacts to the Project. Similar to the Project, future development would also be subject to review by the Airport Land Use Commission (ALUC), which would ensure the site design would be consistent with the ALUP.

Noise. This alternative would continue to result in construction-related noise, where City noise thresholds for noise-sensitive residential uses approximately 100 feet from construction vehicle routes would be temporarily exceeded during construction activities. The potential for higher total buildout intensity would result in incrementally more noise impacts during construction activities and would be expected to increase operational ambient noise levels due to increased density and intensity of uses. Therefore, noise impacts as identified in Section 3.9, *Noise*, would be incrementally more than the Project under this alternative, and remain significant and unavoidable.

Transportation and Traffic. Impacts to traffic and transportation would be incrementally greater than the Project, as construction impacts and long-term maximum buildout would result in an incrementally higher amount of trip generation. The total allowable buildout would enable 10,000 more sf of commercial development, which, using the trip generation value for Neighborhood Commercial used within Table 9 of the Transportation Impact Study (TIS; Appendix P), would result in up to 1,300 additional trips associated with the addition of neighborhood commercial uses compared to the Project. These additional trips would contribute to an increased amount of traffic and transportation impacts from automobiles within the Project site and adjacent roadways. Considering maximum residential buildout, this alternative proposes 700 units, which would be a reduction of 20 residential units compared to the Project's proposed 720 units. Using the low density

residential trip generation value as depicted in Table 9 of the TIS (Appendix P), this reduction of 20 units could result in up to 209 fewer trips, which would reduce the amount of associated traffic and transportation impacts from residential housing. Combined, there would be an increase of 1,091 trips under this alternative compared to the Project, most of which is associated with the increase in Neighborhood Commercial development. This increase in trip generation would likely result in significant and unavoidable impacts to transportation and traffic greater than that identified within Section 3.12, *Transportation and Traffic*, notably towards exceedance of certain intersection capacities and cumulative impacts.

5.4.2.2 Mitigated Project Alternative

The Mitigated Project Alternative (MPA) includes redesign of key Project elements intended to further reduce environmental impacts identified in the EIR. Required permits, findings and discretionary actions would be similar to the proposed Project:

Discretionary Actions:

- General Plan Amendment;
- Rezone;
- Airport Area Specific Plan (AASP) Amendment;
- Vesting Tentative Tract Map (VTM);
- Development Agreement/ Memorandum of Understanding; and
- Architectural Review approval.

Findings:

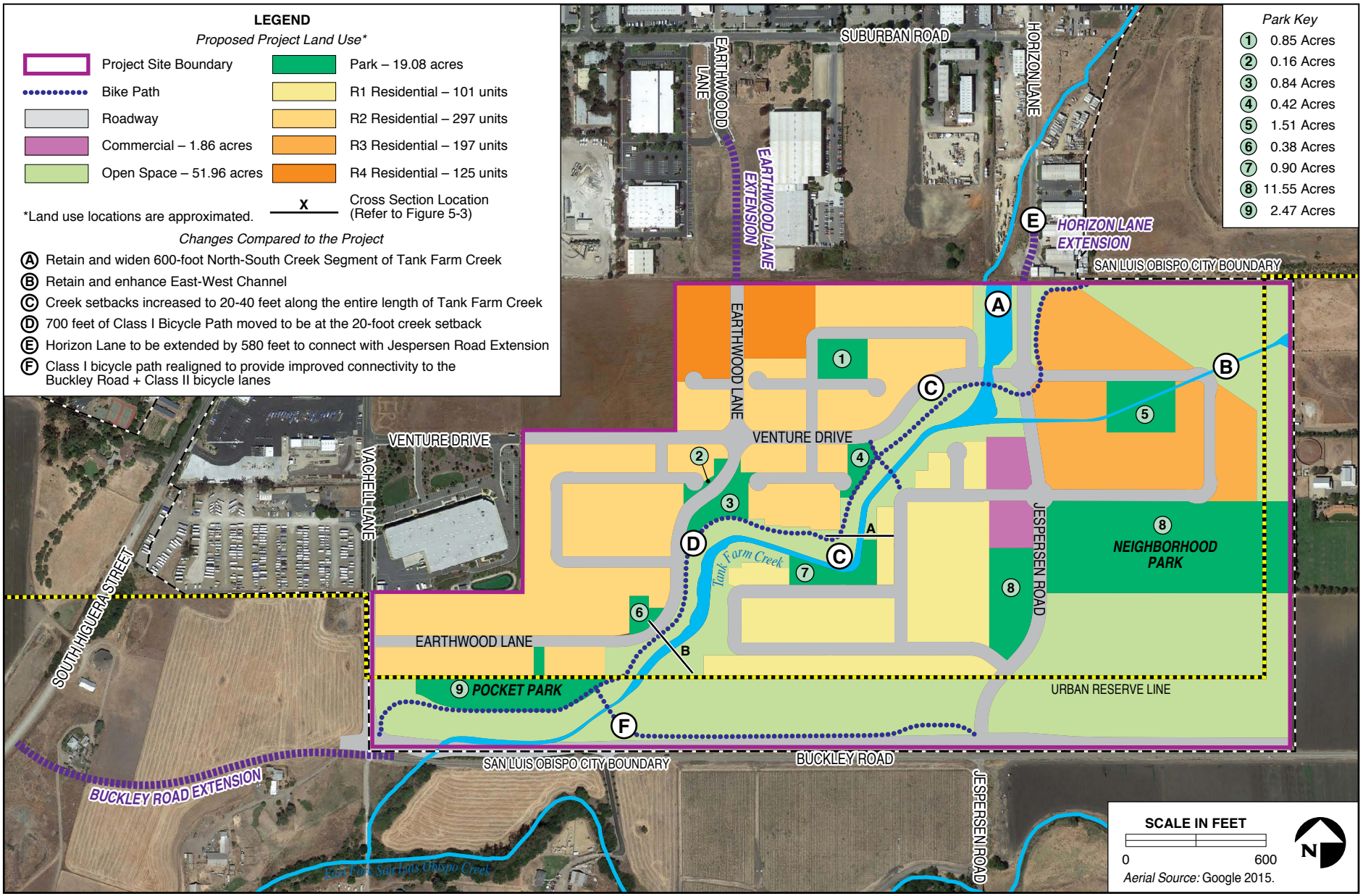
- General Plan Conformity Determination; and
- Airport Land Use Plan (ALUP) Conformity Finding by the Airport Land Use Commission (ALUC).

Responsible and Trustee agency permits would remain similar to the Project (refer to Section 2.6.1, *Required Approvals*). The MPA would include five primary features intended to reduce identified Project impacts: 1) Tank Farm Creek would not be realigned and the existing 600-foot long North-South Creek Segment would be retained to protect riparian habitat and no direct connection with the Chevron Tank Farm property would be provided; 2) the East-West Channel in the northeastern part of the site would be retained to accommodate surface drainage; 3) the mix of allowable uses within the Town Center development would be modified with the intention to reduce trip generation;

4) development setbacks from Tank Farm Creek would be increased to a minimum of 35 feet along a majority of the creek, with a minimum 20-foot setback along approximately 700 feet, primarily from the proposed Class I paved bicycle path, instead of the Project's setbacks of as low as 5 feet; and, 5) a number of onsite and offsite road and circulation improvements would be included as part of the MPA (see *Circulation* below for a list of proposed road improvements). Please see Figure 5-1, Figure 5-2, and Appendix Q for the Draft Development Plan for the MPA.

Land Use Plan

The overall land use plan and site design under the MPA would be similar to the Project (see Figure 5-1). The MPA would continue to provide residential land uses with varying densities, and the same overall number of residential units, but would slightly decrease the number of R-1 low density and R-2 medium density units and increase the number of R-3 medium-high density units. R-1 low density single-family residential neighborhoods would continue to be located south of Tank Farm Creek. Land uses northwest of the creek would continue to consist of a predominantly R-2 medium density single-family neighborhood, with R-4 high density residential uses continuing to be proposed along both sides of the Earthwood Lane at the site's northwest corner. The planned R-3 medium-high density residential uses would continue to be located in the northeast area of the site, although the configuration of this area would differ from the Project because of the revised alignment of Tank Farm Creek. The Town Center would continue to be located in the eastern portion of the site, south and east of the creek along the west side of the Jespersen Road Extension, and would include 15,000 square feet (sf) of commercial buildings. The size and configuration of open space areas would change, resulting in more contiguous open space compared to the Project, with open space concentrated in and adjacent to the 300-foot wide buffer along Buckley Road, along the creek, and in the northeast and southeast corners of the site. Park distribution and layout would change under the MPA, and park acreage would increase to a total of 19.08 acres, and with parks located throughout the Project. Park areas would be increased in the northwest R-2 (Phase 3) area, and in the R-3 (Phase 4) area. Resulting park area would be approximately 11.5 acres per thousand population. Primary internal circulation would remain similar to the Project, although neighborhood street layout in Phases 3 and 4 would change substantially in response to the new land use plan and drainage modifications. Phase 5 streets would be modified to reflect the inclusion of alley units with common open space (see Figure 5-2).



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Conceptual Mitigated Project Alternative

FIGURE 5-1

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Mitigated Project Alternative Composite Site Plan

FIGURE 5-2

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Table 5-1. Comparison of Proposed MPA to the Proposed Project

Item	MPA	Project	MPA Difference
Tank Farm Creek			
North-South Creek Segment	Not Realigned, widened to accommodate flood flows	Realigned and extended through to Tank Farm property	Reduced riparian habitat impacts
East-West Channel	Channel retained	Channel removed	Reduced hydrological impacts and in-channel wetland preserved
Creek/Riparian Buffer Setback	35 feet, with 20-foot minimum along no more than 700 linear feet	Generally 5-35 feet	Improved habitat and wildlife corridor connectivity
Tank Farm Creek Class I Bicycle Path	Minimum of 35 foot setback from top of creek bank/ riparian canopy with 20-foot minimum along no more than 700 lineal feet	Inside creek/ riparian buffer	Improved/ habitat and wildlife corridor
Retaining/flood walls at toe of slope along creek corridor	At setback along east side of the creek	Not included	Improved erosion protection and bio-filtration for runoff
Residential Uses			
Residential: Acreage	55.3 acres	68.23 acres	-12.93 acres
Residential: Units	720 units	720 units	none
Mix of Units	101 R-1 units 297 R-2 units 197 R-2 units 125 R-4 units	105 R-1 units 305 R-2 units 185 R-3 units 125 R-4 units	-4 R-1 units -8 R-2 units +12 R-3 units
ALUP Safety Areas			
Units within ALUP Safety Areas	No residential units within S-1B and S-1C Safety Areas	7 R-3 units within S-1B Safety Area	Residential units relocated outside of S-1B Safety Area
Neighborhood Commercial Uses			
Acreage	1.86 acres	3.34 acres	-1.48 acres
Maximum Square Footage	15,000 sf	15,000 sf	none
Potential Uses	Local uses	Broader mix of uses	Potential trip reduction
Open Space & Parks			
Open Space: Acreage	51.96 acres	55.3 acres	-3.34 acres
Parks: Acreage	19.08 acres	16.00 acres	+3.08 acres
Parks: Number	1 Neighborhood Park 1 Pocket Park 7 mini-parks	1 Neighborhood Park 1 Pocket Park 5 mini-parks	+2 mini-parks, 1 located in the creek setback; 1 located within R-3 development

The proposed MPA would include 55.3 acres of residential land uses (12.93 acres less than the Project), 71.04 of open space and parks (0.27 acres less than the Project), and 1.86 acres of Neighborhood Commercial development (1.48 acres less than the Project), with the balance of the site (approximately 21.71 acres) remaining in roads (see Table 5-2). The MPA would include development of 720 residential units. This level of development allows for a 20-unit density bonus, similar to that as proposed under the Project. Similar to the Project, low, medium, medium-high, and high density residential developments would be constructed along proposed residential collector and local roadways. One Neighborhood Park, seven mini-parks, and one pocket park would occupy 19.08 acres of developed park space, similar to the Project with two added mini-parks (see Figure 5-1).

Table 5-2. Summary of Proposed MPA Land Uses

Land Use	Acreage	Proposed Development Breakdown
Residential	**55.3**	**720 units**
R-1 Low Density (7 du/acre)	12.8 (14%)	101 single-family units
R-2 Medium Density (12 du/acre)	27.3 (41.7%)	297 single-family units
R-3 Medium-High Density (20 du/acre)	10.8 (26.1%)	197 multi-family units
R-4 High Density (24 du/acre)	4.4 (17.2%)	125 multi-family units
Affordable Housing Units	*N/A*	Consistent with City policies and requirements
Neighborhood Commercial	**1.86**	**15,000 sf**
Roadways	**21.71**	**14.4% of site acreage**
Open Space and Parks	**71.04**	**47.4% of site acreage**
Open Space	51.96	34.6% of site acreage
Parks	19.08	12.7% of site acreage

[1] Total exceeds 700 units as allowed in Section 8.1.6 of the Land Use Element due to assumed density bonus units. This total assumes all units planned within residential land uses.

Proposed Housing

The proposed mix of housing types under the MPA would be similar to the Project with slight modifications to the location of residential zones and distribution of units within each zone; the allocation of units between different allowable densities and product types (e.g., single vs. multiple family homes) would remain similar. The MPA would alter the land use plan and incrementally adjust dwelling unit allocation, resulting in a reduction of the R-2 units in the early phases of the Project, a reduction of R-1 units in Phase 5, and the addition of 12 R-3 units to Phase 4. Based upon preliminary plans, R-1 single-family home densities would increase somewhat, leading to incremental decreases in lot size compared to the Project (see Table 5-3).

Similar to the Project, the MPA would be consistent with the City-adopted Community Design Guidelines, would be LEED-ND "Silver" certified, and would include specific design standards (see Appendix F). Architectural styles of residential structures are anticipated to incorporate ranch, bungalow, mission, contemporary, mid-century modern, and craftsman features.

Similar to the Project, proposed housing would include R-1 and R-2 single-family homes and higher density R-3 and R-4 multiple-family condominiums and apartments. Residential uses would have a similar mix of housing densities and average lot sizes as proposed for the Project. Similar to the Project, R-2 units would be arranged along driveways in "four pack" and "six pack" layouts. The R-2 development program would include 76 small "cottage" single family detached units ranging in size from 750 sf to 1,075 sf. The Applicant projects that unit sizes would range from 650 sf for R-4 studio apartments to 2,300 sf for larger R-1 single-family residences, with the average size of 1,477 sf per dwelling unit across the entire MPA.

Table 5-3. Summary and Comparison of Housing and Population

Residential	MPA		Project	
Housing Type	**MPA Proposed Units**	**Estimated Population[1]**	**Project Proposed Units**	**Estimated Population[1]**
R-1 Single-family	101 (14.0%)	232	105	240
R-2 Single-family	297 (41.3%)	680	305	698
R-3 Multi-family[2, 3]	197 (27.3%)	451	185	424
R-4 Multi-family[2]	125 (17.2%)	286	125	286
TOTAL	**720**	**1,649**	**720**	**1,649**

[1] Population estimates are based on the number of units multiplied by the average number of persons per household. In the City of San Luis Obispo, the average number of persons per household is 2.29 (City of San Luis Obispo 2015).
[2]Per City zoning and Specific Plan policies R-3 and R-4 units are expressed as density units, and R-1 and R-2 densities are expressed as dwelling units. The number of actual dwelling units in the R-3 and R-4 zone may vary depending on the number of bedrooms.
[3] Density of R-3 and R-4 units would utilize the incorporated density bonus in accordance with Chapters 17.16.010 and 17.28 of the City's zoning regulations.

Proposed Inclusionary Affordable Housing

Similar to the Project, the MPA would provide a mix of market rate, inclusionary housing and housing targeted to those making 160 percent of the area median income through provision of different densities and designs of proposed new units; inclusionary affordable housing would be provided consistent with City policies and ordinance requirements. Under City Ordinances, inclusionary units would be required to constitute 15 percent of all housing, subject to any reductions available by housing policy. The exact distribution of these units among different housing types and densities would be determined during consideration of the MPA by City decision-makers.

Proposed Neighborhood Commercial Uses

Similar to the Project, the MPA would include the Town Center, which would be constructed adjacent to the Jespersen Road Extension and allow for Neighborhood Commercial uses that may comprise offices, service, and retail purposes aimed towards local residents.

The Town Center would contain 15,000 sf of commercial space, consisting of a variety of uses that may include retail, recreational/gym facilities, laundromats, community meeting rooms, vegetable and flower stands, etc.

The MPA would include development of up to 15,000 sf of new building space, similar to the Project. The Town Center would be shifted approximately 175 feet north of the location proposed in the Project to accommodate a four-way intersection and lie in closer proximity to proposed R-3 and R-1 residential uses. Additionally, the MPA proposes a different mix of uses compared to the Project, with the mitigation objective of potentially reducing the amount of offsite trips that may be generated (refer to Section 3.12, *Transportation and Traffic*). General retail store square footage would be limited to 7,500 sf, and individual stores would not exceed 1,800 sf. General (non-medical) professional, business, and services offices would be allowed. Uses within the proposed Town Center may include the following:

- General (non-medical) accessory, professional, business and service offices;
- General retail
- Restaurants
- Limited indoor commercial recreation and/or fitness/gym facilities;
- Religious facilities;
- Specialized and technical schools, private schools and tutoring services;
- Laundromats;
- Communication facilities, including community Wi-Fi/Wireless/digital in conformance with ALUP and FAA requirements;
- Public and quasi-public spaces;
- Community meeting rooms;
- Outdoor recreation and event locations (amphitheater, etc.) in conformance with ALUP density restrictions; and
- Fruit, vegetable and flower stands.

Proposed Parks and Open Space

As with the Project, approximately 16.49 acres of parks would be required under the MPA by Parks and Recreation Element Policies 3.13.1 and 3.15.3. The MPA would include an increase of approximately 19.08 acres of parks, approximately 2.6 acres more than the City requirement of 16.5 acres of park area for the 1,649 residents.

The MPA would provide a total of seven mini-parks, one Neighborhood Park, and one pocket park, which is two additional mini-parks compared to the Project. The MPA proposes an approximately 10.5-acre Neighborhood Park (0.7 more than the Project) east of the Town Center to fulfill Parks and Recreation Element Policy 3.15.1, which requires an 8-acre Neighborhood Park for the planned population. The MPA would also enable installation of two additional mini-parks compared to the Project. One 1.5-acre mini-park would be provided within the R-3 medium-high density residential zone along the East-West Channel, and one mini-park is proposed adjacent to Tank Farm Creek within the R-1 low density residential zone under the MPA. No riparian vegetation clearance would occur within the creek setback areas during development of the mini-park, and landscaping would be limited to native species; grading would be minimized and walkways limited to natural surfaces, with any hard improvements (e.g., picnic facilities) adhering to a minimum setback.

Tank Farm Creek and the riparian buffers along its sides would also provide an open space area between the creek and residential development totaling approximately 15 acres (3 acres less than the Project, and includes one new mini-park).

Relationship of Development to the ALUP Safety Areas

Similar to the Project, the MPA adheres to the constraints imposed by airport noise corridors included in the ALUP, as no development is proposed within the 65 dB single event noise contour. Like the Project, the MPA would adhere to land use density limitations for the respective ALUP Safety Areas, for the location of the zones as determined by the ALUC during the Project's pre-application. Additionally, compared to the Project, the MPA has eliminated all seven R-3 residential units permitted by the ALUP in Safety Area S-1B.

Circulation

Circulation improvements under the MPA would include a similar network of roads and trails within the Project site as the proposed Project. Integration with the surrounding

roadways would also be similar to the Project, with the addition of the extension of Horizon Lane north from the Project site (see Figure 5-1 and Appendix Q).

Offsite Improvements and Integration with the External Circulation Network

Similar to the Project, offsite roadway improvements included as part of the MPA would consist of:

1. The extension of Buckley Road along the Caltrans alignment to South Higuera Street and the establishment of connections from the Project to the external circulation system. This is proposed as part of Phase 2 of MPA development.

2. Buckley Road frontage improvements along the Project site (i.e., left and right turn lanes, and 8-foot wide Class II bicycle lanes on both sides where not constrained by bridge width or right-of-way).

3. The extension of Earthwood Lane from the Project site north to its current terminus approximately 580 feet north of the Project site to provide circulation through to Suburban Road. This road would meet the standards for a residential collector (e.g., 44 to 60 feet in width) and would be completed in Phase 1 of development.

In addition, the MPA would include several offsite roadway improvements intended to minimize traffic and transportation impacts identified for the Project. These would include the following:

4. The extension of Horizon Lane from the Project site north approximately 100 feet, north to the existing partially developed Horizon Road, which would provide a second connection through to Suburban Road. This would be completed as part of Phase 4 of MPA development.

5. Installation of left turn restrictions at the Vachell Lane/South Higuera Street intersection after the completion of the Buckley Road Extension under Phase 2 development.

6. Temporarily restricted ingress and egress to the Project site from Venture Drive/Vachell Lane and Earthwood Lane, except for emergency vehicles, bicycles, and pedestrians during Phase 1 development. Measures would be removed after Buckley Road Extension is completed and operational under Phase 2.

7. Offsite intersection improvements, to the South Higuera Street/Suburban Road intersection, including restriping to make the westbound turn lane into a shared

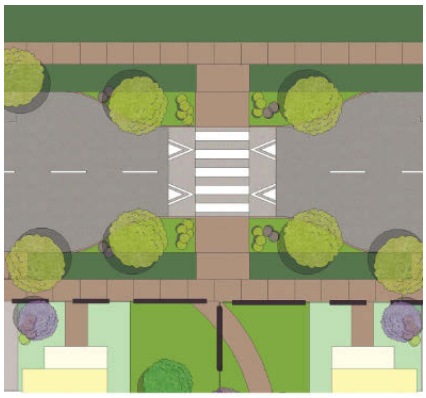
right/left turn lane to extend the length of the westbound left and right turn-lane and protected signal phasing for left turns.

8. Offsite improvements to the currently substandard reach of Horizon Lane would bring this road segment to City standards for a residential collector, with a width between 44 to 60 feet. This would also include intersection improvements to Horizon Lane/Suburban Road to achieve standards within the City Uniform Design Criteria and Municipal Code.

9. Improvements along Suburban Road in order to bring this road to conformance with City standards for a commercial collector to effectively serve commercial and industrial uses and through traffic generated by the MPA. Improvements to the western end of Suburban Road would be completed within Phase 1, while improvements to the eastern end would be completed within Phase 4.

Proposed Vehicular Circulation within the Project Site

Circulation within the Project site would remain largely consistent with the Project, retaining the 60-foot wide primary access collector roads of Jespersen Road Extension, Venture Drive Extension, and the north-south portion of the Earthwood Lane Extension. The Jespersen Road Extension within the Project site would be shifted east approximately 25 to 50 feet to accommodate the Tank Farm Creek flood control expansion, and a portion of Earthwood Lane would be shifted away from Tank Farm Creek to provide a wider buffer from the creek.



Traffic calming measures for residential collectors would include speed tables with parklets, and zebra striped pedestrian crossings.

Venture Drive and Jespersen Road/Horizon Lane extensions within the site would be classified as residential collectors, Earthwood Lane north of Venture Drive would be classified as a 60-foot wide residential collector, Earthwood Lane south of Venture Drive (to its east-west portion) would be classified as a 48-foot wide residential road, and the remaining street segments would be classified as residential local streets.

The 48-foot wide residential road configuration would also remain largely consistent with the Project under the MPA, though would be altered slightly with removed street portions and an increased number of cul-de-sacs. These changes would alter circulation within the

Project site for some streets affecting up to 46 residential units. Proposed residential roads that would change from the Project would be "Bravo Street", "Foxtrot Court", "Kitty Hawk Court", "Memphis Belle Way", "Earthway Lane", and "Hughes Lane" as labeled on the VTM for the MPA (see Appendix Q).

Special street standards and cross sections are established for each area. Traffic calming measures would be included throughout, especially along the extensions of Venture Drive, Horizon Lane, and Jespersen Road (see Appendix Q). Project roadways and driveway design would be reviewed and approved by the City to ensure compliance with City and Caltrans standards and best practices (e.g., aligning driveways on opposite sides of the roadway, positioning driveways as far upstream from intersections as possible).

Class I Paths and Class II Bicycle Lanes, and Pedestrian Circulation

The widths and circulation patterns of all Class I and Class II bicycle paths would remain consistent with the Project. However, an approximately 450-foot stretch of the MPA Tank Farm Creek Class I bicycle path adjacent to the northwestern edge of the southwestern reach of Tank Farm Creek would be setback further from the creek than proposed under the Project. The hardscape paving of the Class I bicycle path would be constructed outside the minimum 20-foot setback along this stretch of the creek, instead of within the setback as proposed within the Project. The Buckley frontage Class I bicycle path would be realigned to be provide a more direct connection across Tank Farm Creek.

Pedestrian circulation under the MPA would be similar to the Project, with sidewalks and bicycle paths throughout the Project site following a pattern almost identical to the Project. However, as described above, some residential local road configurations would terminate in cul-de-sacs in order to conform to City access management guidelines. Pedestrians could travel similar routes by walking through the ends of some cul-de-sacs to adjacent areas. In addition, when compared to the Project, under the MPA two local residential road connections to the Earthwood Lane Extension within the R-2 residential zone would be removed and replaced with cul-de-sacs. Additionally, parts of at least two roads would be removed entirely, focusing access within the Project site and reducing the number of potential pedestrian or bicycle routes.

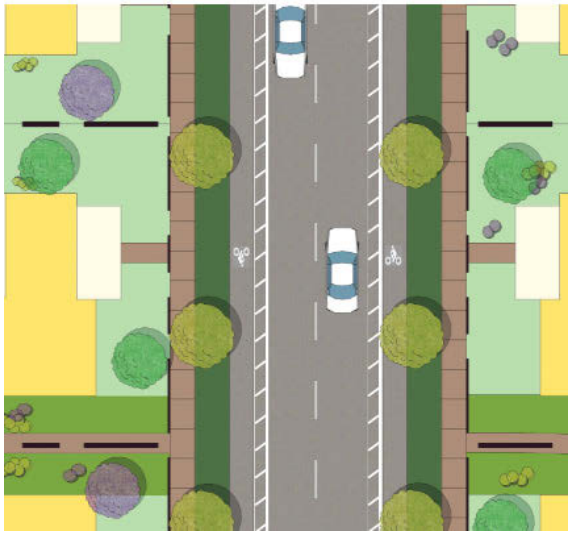
In addition, the following bicycle and pedestrian measures would be included as part of the MPA that are not included for the Project, in order to minimize impacts to bicycle circulation:

1. Design and construction of Class II bicycle lanes that connect to the regional bicycle network along the entire stretch of Vachell Lane, between Buckley Road and South Higuera Street, as part of Phase 1 development.

2. Move the location of the Buckley Road Class I bicycle path to be adjacent to Buckley Road west of Tank Farm Creek to provide continuous bicycle connection along Buckley Road. This would result in consistency with the Bicycle Transportation Plan (BTP). The Buckley Road Class I bicycle path would be realigned to reduce the curvature of the bicycle path and to provide a more direct and visible route across Tank Farm Creek (and around the Buckley/Tank Farm Creek bridge.

Parking

The MPA's parking arrangements and locations are largely similar to the Project, with on-street parking available in residential areas, covered onsite garages, and onsite guest parking spaces. At least 810 spaces (10 less than the Project) would be provided for R-1 and R-2 single-family residences, which require a minimum of two spaces, and R-3 and



Proposed 60-foot wide residential collectors would contain two vehicle travel lanes, 8-foot Class II bicycle lanes, 5-foot sidewalks, and 7-foot planters on both sides.

Proposed 48-foot wide residential local streets would contain two vehicle travel lanes, street parking, and 6-foot sidewalks on both sides.

R-4 multi-family units would provide spaces in accordance with the associated Zoning Ordinance as proposed for the Project. Portions of the R-2 development for "cottage" units would have a one car garage and an adjacent parking space. Approximately 60-70 spaces would be provided to support the Town Center, a 35 percent reduction from the Project. Added parking will be included in the final design of the Neighborhood Park to support that use.

Transit Improvements

Similar to the Project, the Applicant would coordinate with SLO Transit to accommodate changes in bus routes that would utilize new collector roads and to install two bus stops: one at the Town Center and one adjacent to the R-4 area on Earthwood Lane north of Venture Drive, and would ensure that adequate service would be provided to the two proposed bus stops. The bus stops would be constructed within the respective phase's development area. The proposed transit service onsite would meet standards stated in Policy 3.1.6, Service Standards, which require a transit route within 0.125-mile of R-2, R-3 and R-4 zones. In addition, during ongoing construction of the Project, the City and Applicant would work with SLO Transit to establish an interim route in the Project vicinity during Phase 1. This would include an interim turn-around location within the Project site at Venture Drive/Earthwood Lane, or other measures as deemed appropriate by the City to accommodate this interim transit access due to required site access limitations.

Utilities and Services

Similar to the Project, water, sewer, police, and fire services would be provided by the City. Natural gas service would be provided by Southern California Gas Company (SoCal Gas), and Pacific Gas & Electric (PG&E) would provide electrical service. Charter Communications would provide cable and television services. Water facilities would be installed to the Project site in a similar manner to the Project, as would integration of natural gas and electrical services. In addition, the MPA would abandon the exiting well within the northwest corner of the site (within the Phase 3 area) and install a replacement well in the open space buffer outside the URL to be used for agricultural irrigation within the Project site. This well would be used to irrigate the proposed 27 acres of agricultural area within Project site.

Police services would also be provided in a manner similar to the Project. Similar to the Project, fire protection services would be improved through dedication of a 0.3 acre site to house an Interim Fire Station. The 2009 Fire Department Master Plan recommended the

establishment of a fifth fire station for coverage of the southern areas of the City. Adoption of the 2016 Fire Department Master Plan finalized plans for the establishment of a fifth fire station for coverage of the City's southern and southwestern (and southeastern areas like Islay) areas. A two-person crew is recommended to be housed and staffed upon 50 percent buildout of the Project site, and a full, three-person crew at 90 percent buildout of the southern planning area of the City as identified in the 2016 Fire Department Master Plan (see also Section 3.11, *Public Services*). Funding is still being acquired to enable construction and operation of the full station, and development projects in this area are anticipated to pay fair share of the cost. The Interim Fire Station is proposed as part of the MPA at 50 percent buildout of the Project site and would be staffed by a two-person crew to serve development under the MPA and nearby projects. The Interim Fire Station would be located within the Project site, on Earthwood Lane north of Venture Drive. This Interim Fire Station would remain in operation until the City's fifth fire station is constructed and fully operational, at which point the City's fifth fire station would provide fire protection services for the new residential units and surrounding populace near the City's southern edge, and the Interim Fire Station will be decommissioned, and the site converted to a public park.

Stormwater Conveyances

Similar to the Project, development under this alternative would be subject to the Low Impact Development (LID) requirements of the Regional Water Quality Control Board's (RWQCB's) Post Construction Requirements. Development would also integrate the seven proposed culverts and infrastructure plan to direct surface runoff from streets and sidewalks via gutters throughout all phases of construction; this is one less outfall compared to the Project (see Appendix Q). The drainage culverts throughout the site would be installed beneath proposed Project roadways, and similar to the Project, a dual pocket park/bioretention basin would be located at the southwestern edge of the Project site.

Under the MPA, the 600-foot North-South Creek Segment would retain its existing alignment. In addition, this segment would be widened and enhances in order to carry greater offsite flows from the north.

Like the Project, proposed stormwater conveyance infrastructure would include an approximate 1,600-foot long collection swale along the northern boundary of the Project site that would be managed and maintained by the local homeowners association. Culvert and concrete apron sizes at Tank Farm Creek drainage outlets would be similar to the Project.

In contrast to the Project, under the MPA, the 1,600 foot-long collection swale along the northern site boundary would increase to 20 feet in width (8 feet wider than the Project) and rather than concrete would be unpaved, enabling a shallower grade of runoff, increased groundwater infiltration and establishment of limited native vegetation. The 20-foot wide collection swale would continue to extend from the northwest corner of the Project site to the proposed Jespersen Road Extension. The swale would be backed on the south side by a concrete block gravity wall rising 18 inches to 24 inches (reduced from the Project's 2 to 4 feet height) above the existing grade, with both banks graded to 3:1 slopes (instead of the Project's proposed 2:1 slopes). The swale would collect offsite runoff entering the site from north, particularly from the three existing retention basins located offsite adjacent to the northern Project boundary; the swale would contain a 5 percent longitudinal slope that would send runoff flows to the east and convey stormwater south via three culverts that would ultimately discharge to Tank Farm Creek. Stormwater conveyances and discharges to Tank Farm Creek would be of a similar configuration as the Project (refer to Figure 2-10 and Table 2-6).

Tank Farm Creek Alignment and Setbacks

Similar to the Project, the MPA would restore disturbed areas of Tank Farm Creek and enhance existing habitats. Substantial grading would occur along both sides of the creek corridor outside of existing riparian canopies to raise finished floor elevations for new building pads, and the creek would also undergo a series of modifications to control flood flows.

Unlike the Project, the MPA would not realign the North-South Creek Segment of Tank Farm Creek nor remove the East-West Channel, and would not include installation of a culvert through the existing 15- to 20-foot high berm along the Project site/ Chevron Tank Farm property boundary. Instead, drainage from Tank Farm Creek would continue to be routed around the berm along its current course toward areas to the north of the western half of the Project site. The existing North-South Creek Segment would undergo widening and restoration to convey flood flows and improve habitat between the proposed Jespersen Road Extension and proposed residential areas to the west. Additionally, the channel would

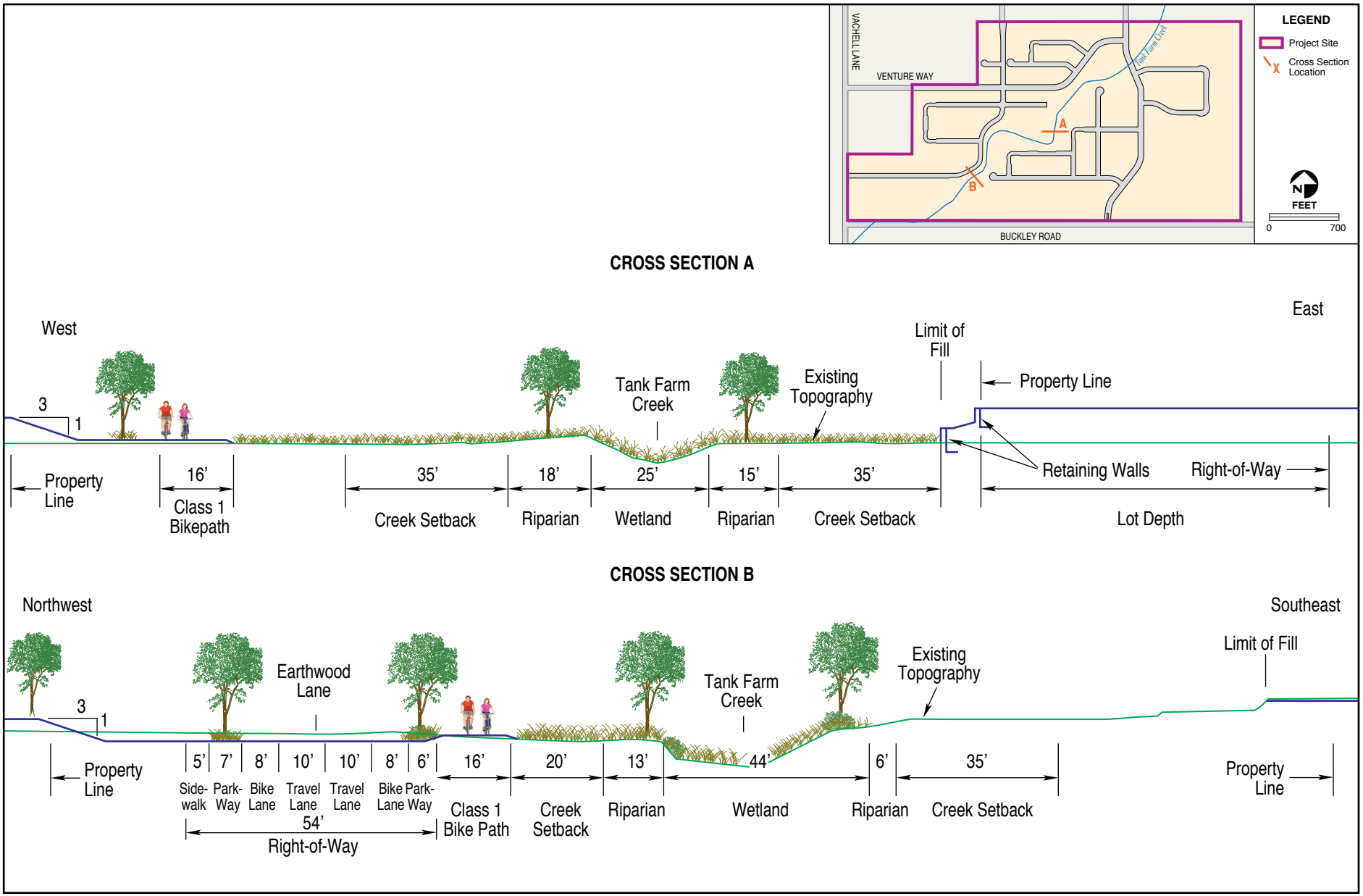
be widened south of the Venture Drive Extension at the confluence of the North-South Creek Segment with the East-West Channel to accommodate flood flows. The widening of Tank Farm Creek described above would add 0.63 acres of wetlands under the MPA.

Under the MPA, creek setbacks for new development would be increased along much of Tank Farm Creek. Setbacks along a majority of the creeks would be increased to approximately 35 to 40 feet, with development setback beyond these boundaries (see Figure 5-3). Development of portions of two proposed mini-parks would occur partially within creek setbacks and portions of the Earthwood Lane and Venture Drive extensions north of the creek as well as segments of local collector streets to the south would be located within 35 to 40 feet of the creek. The increased setbacks include the following adjustments to components within the MPA:

1. The proposed 16-foot-wide Tank Farm Creek Class I bicycle path corridor, consisting of 12 feet of paving with 2-foot decomposed granite shoulders on either side, would be located outside of a 20-foot minimum creek setback along the southwestern extent of the route. A total of 700 feet of the proposed path runs adjacent to the minimum 20-foot setback in two separate locations, comprising approximately 10 percent of the total creek frontage area of approximately 7,300 feet. The majority of the path adheres to setbacks of 35 to feet from the top of bank or edge of riparian canopy (whichever is further) of Tank Farm Creek.

2. The MPA would include a low gravity wall adjacent to fill slopes bordering Tank Farm Creek. The walls would be placed at the edge of the 35-foot setback, and would include slope stabilization, reinforcement, filtration, and drainage improvements. Associated fill slopes would not exceed a slope of 3:1.

3. In order to increase setbacks of the Class I bicycle path from Tank Farm Creek, under the MPA, Earthwood Lane would be shifted 25 to 50 feet west compared to the Project's proposed alignment. This realignment would change the function of Earthwood Lane from a residential collector to a residential local street with Class II on-street bicycle lanes on both sides of the street, and no street parking. In addition, replacement park space is proposed on the east side of Earthwood south of Venture Drive between Earthwood Lane and the creek setback to accommodate the realignment of Earthwood.



Illustrative Tank Farm Creek Cross Sections for the Mitigated Project Alternative

FIGURE 5-3

4. In contrast to the Project, under the MPA no residential development, housing pads, manufactured slopes, would be constructed within the minimum 35-foot creek setbacks; with the exception of the 700 feet discussed above, most paved bicycle path segments would adhere to this 35 foot setback as well. Further, one mini-park would be constructed along almost 450 feet of the creek, with designated parkland extending up to the top of the creek bank (Figure 5-2). Development of the mini-park would thus be limited by creek protection standards, with all improvements within 20 feet of the top of the creek bank or edge of riparian canopy limited to native habitat restoration. However, outside the 20-foot minimum setback, recreational facilities could be developed along with further restoration and use of native landscaping as appropriate.

5. Approximately 350 feet of the Jespersen Road Extension, west of the North-South Creek Segment and north of Venture Drive would meet only a 20-foot minimum setback.

Project Construction and Phasing

Similar to the Project, MPA construction would occur over six phases, and is anticipated to be completed over a period of approximately 10 years between 2020 and 2030 (see Table 5-4). Phase 1 would involve grading activities of Phase 3 and Phase 5 to borrow 6,517 cubic yards (cy) of fill soils needed for Phase 1. Phase 4 would involve grading activities of Phase 5 to borrow 4,302 cy of fill soils needed for Phase 1. Building construction, regarding, paving, and architectural coating activities would occur within each phase sequentially. Each phase would be subject to permit review to ensure conformity with the approved Avila Ranch Development Plan and the AASP, and consistency with applicable regulations. Each phase would identify the development activities to be performed during the phase and specify mitigation measures and best management practices (BMPs) that would apply.

Each phase of the MPA would follow a progression of stages similar to that proposed for the Project, as follows: re-construction design and permitting, site preparation and grading, construction, and final landscaping. Equipment anticipated for use during these stages under the MPA would be similar to that of the Project. The MPA would include a different assortment of construction activities within each construction phase, though would follow a similar progression of development within the Project site. Table 5-4 identifies which items would occur within each phase.

Table 5-4. MPA Construction Phasing

Phase	Project Component	Year	Grading (cy)[1]
1	• Construction of 177 R-2 units. • Installation of Class II bicycle lanes along Vachell Lane from Buckley Road to South Higuera Street. • Extension of Earthwood Lane from the roadway segment off of Suburban Road through the Project site and connecting to Vachell Lane, along with Class II bicycle lanes and sidewalks. • Improvements to Suburban Road between Earthwood Lane and Higuera Street.[2] • Extension of Venture Drive along the frontage of the phase through the Venture Drive/Earthwood Lane roundabout and connection of Earthwood to Suburban, with Class II bicycle lane. • Restrict vehicle access to the Project site from Venture Drive/Vachell Lane and from Earthwood Lane until the completion of the Buckley Road Extension. • South Street/Higuera Street intersection improvements to provide more storage capacity.[2] • South Higuera Street/Prado Road intersection improvements.[2] • Tank Farm Road/South Higuera Street intersection improvements.[2] • Restriping of Suburban Road at Suburban Road/South Higuera Street intersection. • Construction of the sewer pump station and force main along Earthwood Lane Extension. • Extension of dry utilities proposed within Phase 1. • Completion of pedestrian and bicycle bridge over Tank Farm Creek in the southwestern portion of the site (Class I Tank Farm Bridge No. 1). • Construction of Class I bicycle path from the southwest corner of the Project site north of Tank Farm Creek and paralleling Buckley Road to Class I Tank Farm Bridge No. 1 within the Project site, and along Tank Farm Creek within Phase 1 of the site. • Construction of residential roads. • Installation of transit stop to the east of the proposed roundabout at Venture Drive/Earthwood Lane. • South Higuera Street/Suburban Road intersection improvements. • Development of the pocket park/bioretention basin and mini-parks. • Development of the open space buffer and landscaped berm. • Grading of Phase 3 and 5 areas to provide 6,517 cy of fill.	2020 - 2023	110,800 cut/ 117,317 fill
2	• Construction of 29 R-2 units. • Extension of utility lines throughout the Phase 2 area. • Completion of Buckley Road Extension from the Project site to South Higuera Street, including Class I & II bicycle paths. • Installation of turn restrictions on Vachell Lane/ South Higuera Street following completion of the Buckley Road Extension. • Installation of the Tank Farm Creek Class I bicycle path along Tank Farm Creek within Phase 2.	2024	74,450 cut/ 74,850 fill

Table 5-4. MPA Construction Phasing (Continued)

Phase	Project Component	Year	Grading (cy)[1]
3	• Construction of 91 R-2 units. • Construction of 125 R-4 units. • Extension and completion of MPA collector and residential roads throughout the site along the Project site frontages to Tank Farm Creek. • Construction of the Phase 3 mini-park. • Completion of the Tank Farm Creek Class I path. • Construction of 20-foot swale. • Construction of the Interim Fire Station.	2024 - 2025	70,258 cut/ 64,186 fill
4	• Construction of 197 R-3 units. • Development of the Neighborhood Park and community gardens. • Construction of 1.5-acre mini-park within R-3 housing. • Construction of vehicle and pedestrian bridge from Venture Drive to Jespersen Road. • Construction of the offsite Horizon Lane Extension. • Buckley Road frontage improvements from Tank Farm Creek to the eastern Project site boundary. • Completion of Jespersen Road to Buckley Road roadway segment and utilities along this roadway. • Connection of Horizon Lane to Suburban Road, and related improvements to Suburban Road from Horizon Lane to Earthwood Lane. • Grading of Phase 5 area to provide 4,302 cy of fill.	2026 2028	22,200 cut/ 26,502 fill
5	• Construction of 101 R-1 units. • Installation of utilities with the R-1 residential area. • Installation of park facilities between the R-1 area and Jespersen Road.	2026 - 2028	62,000 cut/ 53,950 fill
6	• Construction of the Town Center. • Construction of the remainder of utilities along Buckley Road, and open space/buffer area along Buckley Road. • Widen Buckley Road from Tank Farm Creek to western edge of the Project site to accommodate westbound Class II bicycle lane and installation of the westbound Class II bicycle lane along Buckley Road from Tank Farm Creek to the eastern edge of the Project site.	20229 - 2030	8,756 cut/ 8,756 fill
TOTAL			348,646 cut/ 345,561 fill

[1] Grading estimates (cy) are approximate.
[2] Indicates required mitigation that would be subject to reimbursement agreements.

Analysis

The significance of each impact resulting from implementation of the MPA has been determined based on impact significance criteria and applicable CEQA Guidelines for each

impact topic. Table 5-5 presents a summary of the impacts, mitigation measures, and residual impacts from implementation of the MPA.

Table 5-5. MPA Impacts, Mitigation Measures, and Residual Impacts

Impacts	Mitigation Measures	Residual Significance
3.1 Aesthetics and Visual Resources		
VIS-1. Implementation of the MPA would result in impacts to the existing scenic resources present at the site, particularly due to conversion of agricultural land to urban development, loss of mature native trees along Tank Farm Creek, and impairment of distant views of the Santa Lucia Mountains, Islay Hill, and Irish Hills from adjacent public roads.	None required	Less than Significant (Similar)
VIS-2. The proposed MPA would result in a change in the existing visual character of the site with the change of the rural character to a commercial and residential neighborhood.	None required	Less than Significant (Incrementally Less)
VIS-3. Construction of the MPA would create short-term disruption of the visual appearance of the site for travelers along Buckley Road, Vachell Lane, and Venture Drive.	None required	Less than Significant (Less)
VIS-4. The proposed MPA would introduce a major new source of nighttime light, impacting the quality of the nighttime sky and increasing ambient light.	None required	Less than Significant (Similar)
3.2 Agricultural Resources		
AG-1. The proposed MPA would impact agricultural land within the Project site and offsite Buckley Road extension with the direct conversion of historically cultivated farmland to urban development.	MM AG-1	Significant and Unavoidable (Similar)
AG-2. Development of the proposed MPA would create potential land use conflicts with continued agricultural operations to the south and east of the Project site.	MM AG-2a MM AG-2b	Significant but Mitigable (Similar)
3.3 Air Quality and Greenhouse Gas Emissions		
AQ-1. The MPA would result in potentially significant construction-related air quality impacts from dust and air pollutant emissions generated by grading and construction equipment operation.	MM AQ-1a MM AQ-1b MM AQ-1c|	Significant and Unavoidable (Similar)
AQ-2. The MPA would result in significant long-term operation-related air quality impacts generated by area, energy, and mobile emissions.	MM AQ-2a MM AQ-2b	Significant and Unavoidable (Similar)
AQ-3. Release of toxic diesel emissions during initial construction and long-term operation of the MPA could expose nearby sensitive receptors to such emissions.	None required	Less than Significant (Similar)

Table 5-5. MPA Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
AQ-4. Construction and operation of the MPA would result in impacts to global climate change from the emissions of GHGs and would be potentially inconsistent with the City's Climate Action Plan.	MM AQ-2a MM TRANS-2d MM TRANS-2f MM TRANS-10a MM TRANS-10b MM TRANS-10c MM TRANS-12	Significant but Mitigable (Less)
AQ-5. The MPA is potentially inconsistent with the County of San Luis Obispo APCD's 2001 Clean Air Plan.	MM AQ-2b MM TRANS-12	Significant and Unavoidable (Similar)
3.4 Biological Resources		
BIO-1. Construction activities within the Project site and Buckley Road Extension site, including extensive grading, excavation, and fill, would result in permanent and temporary impacts to sensitive habitats and species, particularly in areas within or near Tank Farm Creek.	MM BIO-1a MM BIO-1b MM HYD-1a – 1c	Significant and Mitigable (Less)
BIO-2. Onsite MPA development would result in permanent loss of habitats within the Project site, including protected wetlands and riparian areas associated with Tank Farm Creek.	MM BIO-2b MM BIO-2c MM BIO-2e MM BIO-2i	Significant but Mitigable (Less)
BIO-3. Onsite MPA development would interfere with the movement of common wildlife and special status species through establishment of confined wildlife corridors within the Project site.	MM BIO-1a MM BIO-1b MM BIO-2b MM BIO-2c MM BIO-2e MM BIO-2i MM BIO-3a – 3d MM	Significant but Mitigable (Less)
BIO-4. Offsite improvements to and extension of Buckley Road and associated bicycle and pedestrian paths have the potential to create permanent impacts to special status species through removal of suitable habitat.	MM BIO-1a MM BIO-1b MM BIO-3a MM BIO-3b MM BIO-4	Significant but Mitigable (Similar)
BIO-5. Long-term operation of the MPA has the potential to create significant impacts to biological resources as a result of increased light, noise, and increased human presence and other urban edge effects.	MM BIO-5a MM BIO-5b	Significant but Mitigable (Less)
BIO-6. MPA development could impact offsite biological resources from sedimentation into Tank Farm Creek.	MM BIO-1a MM BIO-1b MM BIO-6 MM HYD-1a – 1c	Significant but Mitigable (Incrementally Less)

Table 5-5. MPA Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
3.5 Cultural Resources		
CR-1. The MPA would result in adverse impacts to the octagonal silo foundation, historic feature P-40-038310.	None required	Less than Significant (Similar)
CR-2. Development and grading would result in direct significant impacts to known prehistoric resources within the site.	MM CR-2a MM CR-2b	Significant but Mitigable (Similar)
CR-3. Earthwork and ground disturbing construction activities for the MPA could potentially uncover significant unknown prehistoric or historic archaeological resources. If improperly handled, such resource could be adversely impacted.	MM CR-3a MM CR-3b	Significant but Mitigable (Incrementally Less)
3.6 Hazards and Hazardous Materials		
HAZ-1. During grading/construction activities and Project operations, the Project would potentially expose persons to potentially toxic, hazardous, or otherwise harmful chemicals through reasonably foreseeable upset and accidental conditions involving the release of hazardous materials into the environment.	MM HAZ-1	Significant but Mitigable (Similar)
HAZ-2. The proposed MPA would not create a hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.	None required	Less than Significant (Similar)
HAZ-3. The Project site is located within the LUCE defined AOZs and ALUP Safety Areas and would potentially result in an airport-related safety hazard for people residing or working in the Project site.	None required	Less than Significant (Similar)
HAZ-4. Implementation of the proposed MPA could expose people or structures to a significant risk of loss, injury, or death involving wildfire.	None required	Less than Significant (Similar)
3.7 Hydrology and Water Quality		
HYD-1. The MPA would result in potentially significant impacts to water quality due to polluted runoff during construction activities.	MM HYD-1a MM HYD-1b MM HYD-1c	Significant but Mitigable (Less)
HYD-2. MPA development would substantially alter existing drainage patterns on the Project site and Buckley Road Extension property, including burial of two segments of Tank Farm Creek and realignment of restored upstream reaches of the creek, which could potentially result in substantial flooding, erosion, or siltation onsite and offsite.	MM BIO-2a (MM MPA-1)	Significant but Mitigable (Less)

Table 5-5. MPA Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
HYD-3. The MPA could potentially result in flooding, including increased flood water surface elevations across the Project site, adjacent properties, and within Tank Farm Creek.	MM HYD-3a MM HYD-3b	Significant but Mitigable (Less)
HYD-4. Installation of a water utility line using horizontal directional drilling would bisect Tank Farm Creek and has the potential to impact water quality.	MM HYD-4a MM HYD-4b	Significant but Mitigable (Less)
HYD-5. Operation of the MPA would result in potentially significant impacts to water quality of Tank Farm and San Luis Obispo Creeks due to polluted urban runoff and sedimentation.	MM HYD-2a MM HYD-5	Significant but Mitigable (Incrementally Less)
HYD-6. The MPA would potentially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or lowering of the local groundwater table level.	None required	Less than Significant (Similar)
3.8 Land Use and Planning		
LU-1. MPA development would include residential uses located within the LUCE-defined Airport Overlay Zones (AOZs) that would be consistent with AOZ density and use restrictions and that would not interfere with airport operations or create safety impacts under recognized state and federal guidance for airport operations and safety.	None required	Less than Significant (Similar)
LU-2. The proposed Project would include development within ALUP Safety Areas S-1B, S-1C, and S-2; however, the Project would be potentially consistent with the ALUP.	None required	Less than Significant (Similar)
LU-3. The proposed MPA would be potentially inconsistent with several adopted City policies in the General Plan designed to protect biological resources and agricultural resources and ensure provision of adequate utilities and public services.	MM AG-1 MM BIO-2b MM BIO-2c MM BIO-2e MM BIO-2i MM TRANS-4 MM TRANS-10a – c MM TRANS-12	Significant and Unavoidable (Less)
3.9 Noise		
NO-1. Short-term construction activities would generate noise levels that would exceed thresholds established in the City's General Plan Noise Element and Noise Guidebook, with potential impacts to sensitive receptors.	MM NO-1a MM NO-1b MM NO-1c	Significant and Unavoidable (Similar)

Table 5-5. MPA Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
NO-2. Short-term noise construction activities could result in exposure of persons to or generation of excessive ground-borne vibration.	None required	Less than Significant (Similar)
NO-3. Long-term operational noise impacts would include higher roadway noise levels from increased vehicle traffic generated by the MPA, MPA operational noise, and exposure of future residents to high noise levels that could result in the exceedance of thresholds in the City's General Plan Noise Element and Noise Guidebook.	MM NO-3a MM NO-3b	Significant but Mitigable (Similar)
NO-4. Development within the ALUP noise contours could cause persons within the Project site to be exposed to unacceptable noise levels.	None required	Less than Significant (Similar)
3.10 Population and Housing		
PH-1. Residential development and associated population growth resulting from the MPA would not exceed the adopted annual growth rate threshold.	None required	Less than Significant (Similar)
PH-2. The construction of 720 units under the Project would provide additional housing for the City of San Luis Obispo, having beneficial impacts related to the jobs/housing imbalance.	None required	Beneficial (Similar)
PH-3. The construction of affordable housing units under the MPA would provide additional affordable housing for the City of San Luis Obispo.	Non required	Less than Significant (Similar)
3.11 Public Services		
PS-1. Implementation of the MPA would potentially increase demand on the SLOPD for police protection services.	MM PS-1	Significant but Mitigable (Similar)
PS-2. Project implementation would increase the demand for SLOFD fire protection services, create potential declines in firefighter to resident ratios, be located outside of accepted response time performance area and necessitate construction of an additional fire protection facility, with potential for secondary environmental impacts.	None required	Less than Significant (Similar)
PS-3. Development of 720 new homes as part of the MPA would generate increases in enrollment at public schools (Los Ranchos Elementary, Laguna Middle, and San Luis High).	None required	Less than Significant (Similar)
PS-4. Implementation of the MPA would potentially increase the demand for park services beyond current capacity.	None required	Less than Significant (Similar)

Table 5-5. MPA Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
3.12 Transportation and Traffic		
TRANS-1. MPA construction activities would potentially create traffic impacts due to congestion from construction vehicles (e.g., construction trucks, construction worker vehicles, equipment, etc.) as well as temporary traffic lane and sidewalk closures.	MM TRANS-1	Significant but Mitigable (Similar)
TRANS-2. Phased MPA development combined with limited site access and related increases in congestion on surrounding roadways would have the potential to cause transportation deficiencies throughout the Project vicinity.	MM TRANS-2a	Significant but Mitigable (Less)
TRANS-3. MPA-generated traffic would potentially create turning movement conflicts at driveways and intersections on the Project site.	MM TRANS-3a	Significant but Mitigable (Less)
TRANS-4. MPA-generated traffic would exceed Circulation Element maximum volume thresholds at Vachell Lane, Earthwood Lane, Horizon Lane, and Suburban Road.	MM TRANS-4	Significant but Mitigable (Similar)
TRANS-5. MPA-generated traffic would cause increase delays and cause exceedance of intersection capacity at the Buckley Road/SR 227 intersection in both the AM and PM peak hours.	MM TRANS-5	Significant and Unavoidable (Similar)
TRANS-6. MPA-generated traffic would exacerbate existing queuing at the South Street/Higuera Street intersection northbound right-turn lane, resulting in significant impacts.	MM TRANS-6	Significant but Mitigable (Similar)
TRANS-7. MPA-generated traffic would cause exceedance of storage capacities at several intersections along South Higuera Street.	MM TRANS-7a MM TRANS-7b	Significant but Mitigable (Less)
TRANS-8. MPA-generated traffic would cause delays and exceedance of intersection capacities at several intersections along Los Osos Valley Road.	MM TRANS-8a MM TRANS-8b	Significant but Mitigable (Similar)
TRAN-9. The proposed MPA would generate and attract trips to and from U.S. Highway 101, incrementally increasing congestion of the region's main highway.	None required	Less than Significant (Similar)
TRANS-10. The proposed MPA would potentially degrade level of service for various pedestrian facilities serving the Project vicinity.	MM TRANS-4 MM TRANS-8a MM TRANS-10a MM TRANS-10b MM TRANS-10c	Significant but Mitigable (Similar)
TRANS-11. MPA development would increase demand for bicycle facilities in an underserved area and would potentially conflict with the City's	None required	Less than Significant (Less)

Table 5-5. MPA Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
Bicycle Transportation Plan regulations and General Plan thresholds.		
TRANS-12. The proposed Project would increase demand for transit services in an underserved area, presenting a barrier to both transit dependent and non-transit dependent households for using transit.	MM TRANS-12	Significant but Mitigable (Similar)
TRANS-13. Under near-term plus MPA conditions, Project-generated traffic would cause delays and exceedance of storage capacities at Buckley/SR 227 and Los Osos Valley Road/South Higuera Street and contribute to road segment congestion.	MM TRANS-13	Significant but Mitigable (Similar)
TRANS-14. Under near-term conditions, the proposed MPA would cumulatively contribute incrementally to increased demand for bicycle and pedestrian facilities, potentially conflicting with the City's BTP regulations and General Plan thresholds.	MM TRANS-10b MM TRANS-14	Significant but Mitigable (Similar)
TRANS-15. Under long-term cumulative plus Project conditions, MPA-generated traffic would result in a cumulatively considerable contribution to potentially significant impacts to the operational conditions at four intersections.	MM TRANS-5 MM TRANS-15a MM TRANS-15b MM TRANS-15c MM TRANS-15d	Significant and Unavoidable (Similar)
3.13 Utilities		
UT-1. MPA generated wastewater would contribute to demand for wastewater collection facilities and remaining capacity of the City's Water Resource Recovery Facility (WRRF).	None required	Less than Significant (Incrementally Less)
UT-2. The MPA would require the expansion of utility infrastructure to serve new development, including water, sewer, gas and electricity into the site; the construction of which could cause environmental effects.	MM AQ-1a MM BIO-1a – 1b MM CR-2a – 2b MM CR-3a – 3b MM HAZ-1 HYD-4a – 4b MM NO-1a – 1c MM TRANS-1 MM UT-2	Significant but Mitigable (Less)
UT-3. Project-related increases in water use would incrementally increase demand for the City's potable water supply.	None required	Less than Significant (Similar)
UT-4. The MPA would generate additional solid waste for disposal at the Cold Canyon Landfill.	None required	Less than Significant (Similar)

Aesthetics. Under the MPA, overall site layout would be similar to the Project, including development of approximately 98 acres of rural open space and agriculture land with 720 one- and two-story single and multiple family residences, limited commercial development, parkland, roads, bridges and infrastructure and associated changes in views from public roads. Similar to the Project, MPA design would continue to include a 300-foot setback of open space buffer from Buckley Road for new residential development as well as construction of a landscaped berm during Phase 1 to screen new development from public viewing areas along Buckley Road. Overall, residual impacts would be similar to the Project.

Impact VIS-1 regarding changes to Key Viewing Areas (KVAs), would be similar to the Project, since adverse visual impacts from converting agricultural land to urban development and impairment of distant medium to high value scenic views KVAs of the Santa Lucia Mountains, Islay Hill, and Irish Hills from adjacent public roads would still occur. The open space buffer and landscaped berm would continue to provide a transition to the agricultural uses adjacent to the site and buffer views of new development from Buckley Road. Therefore, Impact VIS-1 under the MPA would remain less than significant with no mitigation required.

Impact VIS-2, which addresses impacts to visual character of the Project site, under the MPA would be incrementally less compared to the Project. Overall levels of development with associated changes in area aesthetic character would be similar to the Project; however, the MPA would not include realignment of Tank Farm Creek, thereby reducing removal of mature trees that add to the aesthetic character of the site. Further, the MPA would include increased setbacks between Tank Farm Creek and adjacent housing compared to the Project, thereby increasing open space adjacent to the creek. There would, therefore, be a reduced number of native trees lost along Tank Farm Creek due to increased setbacks. Similar to the Project, Impact VIS-2 would be less than significant.

Impact VIS-3, regarding visual impacts associated with short-term construction, would be lessened compared to the Project. In contrast with the Project, the MPA would develop the entire 300-foot wide open space buffer and landscape berm along Buckley Road as part of Phase 1 development instead of Phases 5 and 6, which would allow vegetation within the buffer to become established and provide partial screening of ongoing construction. This would eliminate the need to implement mitigation measure MM VIS-3. Therefore, short-term construction activities under this alternative would not substantially disrupt the visual

appearance of the site for travelers along Buckley Road and Impact VIS-3 would be less than significant.

Impact VIS-4, associated with increased night lighting, would remain largely similar to the Project as the levels and location of lighting would be similar under the MPA, and, therefore, would be less than significant.

Agricultural Resources. Similar to the Project, development of 720 new units and associated urban infrastructure under the MPA would continue to result in permanent conversion of 68 acres of prime soils to urban development, along with loss or disruption of agricultural production on a further 30 acres of farmland of statewide importance. Similar to the Project, implementation of the MPA would result in development of the majority of the prime farmland onsite with urban uses. The majority of prime farmland impacted by the MPA is located within the City's Urban Reserve Line (URL); however, 27 acres of farmland located outside the URL would be maintained for farming within the proposed open space buffer, of which 10 acres are considered prime soils when irrigated. Under the MPA, the existing onsite well would be abandoned and a new well would be installed within the open space buffer to irrigate these proposed agricultural lands.

Similar to the Project, the MPA would result in a permanent loss of approximately 71 acres of prime agricultural soils.

Under the MPA, Impact AG-1, which addresses permanent conversion of agricultural land to urban uses, would be similar to the Project, as development within the Project site would result in a direct loss of nearly 68 acres of agricultural land identified by the U.S. Natural Resources Conservation Service (NCRS) as prime soils. In addition, similar to the Project, the extension of Buckley Road Extension would continue to result in conversion of 3 acres of offsite prime soils. This would result in a total loss of approximately 71 acres in prime soils. Implementation of mitigation measure MM AG-1 would apply to establish an offsite agricultural land conservation of at least 71 acres or payment of in-lieu fees for the preservation of agricultural land. However, this impact would remain significant and unavoidable due to the permanent loss of prime farmland that could not be replaced.

Impact AG-2 addressing potential agricultural land use conflicts would be similar to the Project, as development of the MPA would still create potential conflicts with agricultural

operations to the south and east of the Project site. Construction of the MPA with six phases over approximately 10 years would generate substantial construction-related fugitive dust and traffic, potentially interfering with adjacent agricultural production. Additionally, over the long term similar to the Project, the introduction of residential uses adjacent to existing agricultural operations could cause conflicts surrounding agricultural lands due to increased potential for theft, vandalism, and complaints by future residents about noise, dust, and pesticide use associated with agricultural activity. MPA buildout would substantially increase traffic on area roads, potentially interfering with movement of farm equipment. However, like the Project, the MPA includes a 300-foot wide open space setback from agricultural operations to the south along Buckley Road, and a 150-foot setback on the eastern boundary of the Project site. Implementation of MM AG-2a, and MM AG-2b, which would identify and incorporate appropriate measures to reduce public access to agricultural cultivation areas as well as reduce the potential for noise, dust, and pesticide drift to affect future MPA residents, would reduce potential conflicts with adjacent agricultural uses. Therefore this impact is significant but mitigable under the MPA.

Air Quality and GHG Emissions. The MPA would generate similar air quality emissions as the Project as the MPA would follow a similar construction schedule using the same equipment, contains largely similar land uses, the same number of residential units, and would result in similar trip generation. A separate CalEEMod run was completed for the MPA, and the results of this run are quantitatively compared to the Project run below (see Appendix Q). Overall, impacts identified within Section 3.3, *Air Quality and Greenhouse Gas Emissions*, would be slightly less compared to the Project.

Impact AQ-1, which addresses construction emissions, would be similar to the Project. As the MPA has a similar construction schedule, equipment, and very similar land uses to the Project, construction-related air quality impacts from dust and air pollutant emissions generated by construction activities would be similar, according to CalEEMod estimates (Table 5-6 and 5-7). Therefore, construction-related air quality impacts would still exceed the San Luis Obispo Air Pollution Control District (APCD) Tier 1 Quarterly thresholds for construction emissions of Reactive Organic Gases (ROG) and Nitrogen Oxides (NO_x) and for construction emissions of Diesel Particulate Matter (DPM), although the MPA emissions would fall below the APCD Tier 2 Quarterly thresholds.

Table 5-6. Maximum Short-term Construction Emissions (Unmitigated)

	ROG	NO_x	ROG + NO_x	CO	SO_2	PM_{10}	DPM (fugitive $PM_{2.5}$)	CO_2e
Overall Construction (Maximum Daily Emission)								
(lbs/day)	827.93	81.07	909	160.25	0.29	36.95	14.20	23,908
(tons/qtr) includes Fugitive Dust	2.77	2.29	5.06	3.09	<0.01	0.56	0.24	586
APCD Daily Thresholds (lbs/day)	--	--	137	--	--	--	7	--
APCD Quarterly Thresholds – Tier 1 (tons/qtr)	--	--	2.5			2.5	0.13	--
Above Threshold?	--	--	**YES**	--	--	**NO**	**YES**	--
APCD Quarterly Thresholds – Tier 2 (tons/qtr)	--	--	6.3	--	--	--	0.32	--
Above Threshold?	--	--	**NO**	--	--	--	**NO**	--

See Appendix Q for CalEEMod worksheets.

Table 5-7. Maximum Short-term Construction Emissions (Mitigated)

	ROG	NO_x	ROG + NO_x	CO	SO_2	PM_{10}	DPM (fugitive $PM_{2.5}$)	CO_2e
Overall Construction (Maximum Daily Emission)								
(lbs/day)	827.87	77.01	904.88	151.48	0.29	25.88	8.74	23,302
(tons/qtr) includes Fugitive Dust	2.75	2.14	4.89	3.15	<0.01	0.55	0.14	586
APCD Daily Thresholds (lbs/day)	--	--	137	--	--	--	7	--
APCD Quarterly Thresholds – Tier 1 (tons/qtr)	--	--	2.5			2.5	0.13	--
Above Threshold?	--	--	**YES**	--	--	**NO**	**YES**	--
APCD Quarterly Thresholds – Tier 2 (tons/qtr)	--	--	6.3	--	--	--	0.32	--
Above Threshold?	--	--	**NO**	--	--	**NO**	**NO**	--

See Appendix Q for CalEEMod worksheets.

Like the Project, implementation of MM AQ-1a, which requires a Construction Activity Management Plan (CAMP), MM AQ-1b, which requires the use of low or zero VOC

emission paint, and MM AQ-1c, which requires the development of an offsite mitigation strategy, would also apply to the MPA. Implementation of these mitigations would reduce construction emissions but would remain above the APCD Tier 1 quarterly thresholds. Therefore, impacts would be significant and unavoidable.

Impact AQ-2, which addresses long-term impacts of operational air emissions, would be similar to the Project. As the MPA has similar land uses to the Project and similar trip generation, operational-related air quality impacts generated by area, energy, and mobile emissions would be comparable to the Project, according to CalEEMod estimates. Like the Project, projected emissions for the MPA were also found to be above the established APCD daily thresholds for operational emissions of ROG + NO_x, PM_{10}, and DPM, even after mitigation measures are implemented (see Tables 5-8 and 5-9).

Table 5-8. Maximum Long-term Operational Emissions (Unmitigated)

	ROG	NO_x	ROG + NOx	CO	SO_2	PM_{10}	DPM (fugitive $PM_{2.5}$)	CO_2e
Overall Operational (Maximum Daily Emission)								
Area (lbs/day)	94.06	0.68	94.74	59.41	0.0032	0.33	--	109
Energy (lbs/day)	0.56	4.78	5.34	2.04	0.0305	0.39	--	6,139
Mobile (lbs/day)	17.33	31.94	49.27	152.09	0.5231	37.15	9.77	36,859
Total (lbs/day)	111.95	37.40	149.35	213.54	0.5568	37.86	9.77	43,108
Threshold (lbs/day)	--	--	25	550	--	25	1.25	--
Threshold (tons/year)	--	--	25	--	--	25	--	--
Significant?	**--**	**--**	**YES**	**NO**	**--**	**YES**	**YES**	**--**

See Appendix Q for CalEEMod worksheets.

Table 5-9. Maximum Long-term Operational Emissions (Mitigated)

	ROG	NO_x	ROG + NO_x	CO	SO_2	PM_{10}	DPM (fugitive $PM_{2.5}$)	CO_2e
Overall Operational (Maximum Daily Emission)								
Area (lbs/day)	74.50	0.68	75.18	59.41	0.0032	0.33	--	109
Energy (lbs/day)	0.44	3.78	4.22	1.61	0.0242	0.31	--	4,859
Mobile (lbs/day)	16.47	27.76	44.23	136.47	0.4373	30.85	8.11	30,810
Total (lbs/day)	91.41	32.22	123.63	197.49	0.4646	31.49	8.11	35,779
Threshold (lbs/day)	--	--	25	550	--	25	1.25	--
Threshold (tons/year)	--	--	25	--	--	25	--	--
Significant?	--	--	**YES**	NO	--	**YES**	**YES**	--

See Appendix Q for CalEEMod worksheets.

Like the Project, implementation of MM AQ-2a, which includes water, solid waste, and fugitive dust conservation strategies, and MM AQ-2b, which requires implementation of all feasible measures within Table 3-5 of the APCD CEQA Air Quality Handbook, would also apply to the MPA to reduce adverse operational effects, although impacts would remain significant and unavoidable.

Impact AQ-3 addressing toxic diesel emissions would be similar to the Project, as the MPA would generate similar levels of DPM emissions from construction and operational activities within 1,000 feet of single-family residences adjacent to the east and the Calvary SLO Church to the northwest, which are considered sensitive receptors. As the MPA is also outside the recommended buffer zone of potential Toxic Air Contaminant (TAC) emitters, the MPA is also not expected to expose these sensitive receptors to substantial levels of TACs. Therefore, the impact would be less than significant.

Impact AQ-4, which address contributions to global climate change from greenhouse gas (GHG) emissions, would be less than the Project, as the MPA would reduce GHG emissions and have a greater consistency with the City's Climate Action Plan than the Project. This analysis uses consistency with the Climate Action Plan, as it is a Qualified GHG Reduction Plan, to determine impact significance rather than a quantitative approach, although the CalEEMod estimates of GHGs are provided below. Based on CalEEMod

estimates, construction activities for the MPA would generate an estimated 15,015.16 MT of CO_2e (see Table 5-10). Amortized over a 25-year period (consistent with APCD methodology), construction of the MPA would generate approximately 600.61 MT of CO_2e per year. These CalEEMod estimates are similar to the Project.

Table 5-10. Estimated Construction GHG Emissions (Unmitigated)

Year	Annual Emissions MT CO_2e
2020	933.83
2021	907.18
2022	587.40
2023	581.25
2024	1,177.14
2025	1,926.89
2026	1,529.81
2027	1,739.42
2028	2,345.51
2029	1,867.31
2030	1,419.43
Total	15,015.16
Amortized over 25 years	600.61

Total unmitigated operational GHG emissions generated by the MPA would be approximately 8,719.77 MT CO_2e. Combined with construction emissions amortized over a 25-year period (600.61 MT CO_2e), total GHG emissions for the MPA would be approximately 9,320.38 MT CO_2e, which is 59.39 MT CO_2e less than the Project's total GHG emissions (Table 5-11 and 5-12).

Table 5-11. Estimated Operational GHG Emissions (Unmitigated)

Emission Source	Annual Emissions MT CO_2e
Area	16.39
Energy Use	2,429.94
Solid Waste	468.88
Water Use	117.80
Mobile Sources	5,686.76
Total	8,719.77

See Appendix Q for CalEEMod computer program output and for GHG emission factor assumptions.

Table 5-12. Estimated Operational GHG Emissions (Mitigated)

Emission Source	Annual Emissions MT CO_2e
Area	16.39
Energy Use	1,764.01
Solid Waste	468.88
Water Use	94.95
Mobile Sources	4,754.04
Total	7,098.27

See Appendix Q for CalEEMod computer program output and for GHG emission factor assumptions.

MM AQ-2a, MM TRANS-10a through c, and MM TRANS-12 would apply to the MPA. After factoring in this proposed mitigation, total mitigated operational GHG emissions of the MPA would be approximately 7,098.27 MT CO_2e. Combined with construction emissions amortized over a 25-year period (600.61 MT CO_2e), total GHG emissions for the MPA would be approximately 7,698.88 MT CO_2e, which is 46.81 MT CO_2e less than the Project.

The MPA would achieve greater consistency with the City's Climate Action Plan goals, actions, and strategies. Like the Project, the MPA is consistent with the City's goal for building efficiency since the MPA's buildings would be at least 25 percent more energy efficient than state or local regulations require. The MPA is consistent with the goal for renewable energy with its inclusion of at least 50 percent the residential units with photovoltaic (PV) energy systems that would provide at least 50 percent of the units' electrical energy demand. The MPA is consistent with the transportation and land use goal given the proposed development of pedestrian and bicycle facilities, a dense street pattern, and the inclusion of nearby transit, including the creation of two new bus stops. The MPA would also include additional bicycle and pedestrian improvements that are not part of the Project, in order to minimize impacts to bicycle circulation. In addition to the transit improvements included in the Project, the MPA would include the establishment of an interim transit route in the Project vicinity during Phase 1, in order to accommodate interim transit access. These additions under the MPA would further help to retain consistency with the City's transportation and land use goal even during the early phases of development. The MPA is consistent with the water goal with its inclusion of features to reduce average daily potable water usage, provide recycled water for outdoor use, and implement progressive storm water treatment and management improvements. The MPA is consistent with the solid waste goal with its compliance with the City's waste management practices. The MPA is

consistent with the parks and open space goal with its inclusion of approximately 19.08 acres of parks, which is 3.08 acres more than the Project. The MPA would also provide 51.96 acres of open space and maintain Tank Farm Creek and the riparian buffers, which would provide an additional open space area between the creek and residential development. The MPA is consistent with the government operations goal considering the range of inclusions discussed above. Therefore, the MPA would be consistent with the Climate Action Plan after implementation of all applicable actions and measures, and, with implementation of MM AQ-2a, MM TRANS-10a through c, and MM TRANS-12, impacts from GHG emissions would be significant but mitigable.

Regarding consistency with the Clean Air Plan, Impact AQ-5 would be similar to the Project, as the MPA would also be inconsistent with the Clean Air Plan. This is because the MPA would include the same increase in population as the Project, and would only incrementally reduce the total added average daily trips (ADT) compared to the Project by 7 trips (from 6,776 ADT to 6,767 ADT), as detailed below and in Section 3.12, *Transportation and Traffic*. Therefore, the anticipated population growth and increase in vehicle trips is also inconsistent with the Clean Air Plan under the MPA. Even with the implementation of MM AQ-2b and MM TRANS-12, this impact would remain significant and unavoidable.

Cumulative air quality impacts would remain significant and unavoidable similar to the Project. As the MPA would also result in significant and unavoidable long-term operational air quality impacts within an Air Basin that is in non-attainment, the MPA would contribute cumulatively and considerably to air quality emissions throughout the region. In addition, the Land Use and Circulation Element (LUCE) Update Final EIR also determined that full buildout under the LUCE would be inconsistent with the Clean Air Plan, and cumulative impacts related to this increase in air quality emissions resulting from the MPA would be significant and unavoidable.

Cumulative GHG impacts would remain less than significant similar to the Project with implementation of Project mitigation. Since the analysis of GHG emissions is inherently cumulative in nature, and the preceding analysis found the MPA to have less than significant after mitigation impacts, the cumulative impact is the same.

Biological Resources. Under the MPA, biological resource impacts related to loss of wetland, riparian, and upland habitats and potential effects on sensitive species, particularly within Tank Farm Creek, would be substantially reduced when compared to the Project. The MPA would leave in place the North-South Creek Segment and the East-West

Channel, which would reduce loss of riparian and wetland habitats and impacts to sensitive species. Further, the MPA would reduce direct and indirect impacts to these habitats and sensitive species through inclusion of wider riparian buffers with larger creek setbacks of at least 20 to 35 feet, consistent with COS Policy 7.7.9 and Section 17.16.025 B(c) of the City of San Luis Obispo Zoning Regulations.

Wider creek setbacks of at least 20 to 35 feet under the MPA would reduce impacts to biological resources within the Tank Farm Creek corridor.

Under the MPA, Impact BIO-1 addressing construction impacts would be less severe than under the Project, as Tank Farm Creek would be retained in its existing alignment, and wider creek setbacks would reduce construction activities adjacent to the creek. However, construction would still include extensive grading, excavation, and fill, which would result in permanent and temporary impacts to riparian and upland habitats and sensitive species, specifically in the vicinity of Tank Farm Creek. For example, while direct grading immediately adjacent to or within the riparian canopy would be reduced, the installation of retaining/flood walls along the toe of fill slopes bordering the creek corridor would result in additional major construction activities after completion of rough grading with added potential for disturbance related to the presence of construction equipment and personnel. MM HYD-1a through 1c in Section 3.7, *Hydrology and Water Quality* would help avoid significant impacts to sensitive biological resources within the creek corridor with implementation of a Storm Water Pollution Prevention Plan (SWPPP) and noticing to reduce construction impacts to water quality. In addition, MM BIO-1a would require preparation of a Biological Mitigation Plan with BMPs to reduce or avoid construction-related impacts to sensitive habitats and species, and MM BIO-1b would require a qualified Environmental Monitor and/ or a California Department of Fish and Wildlife (CDFW)-approved biologist to oversee compliance of the construction activities with the Biological Monitoring Plan and applicable laws, regulations, and policies. With implementation of the aforementioned mitigation measures, impacts to biological resources during construction would remain potentially significant but mitigable.

Under the MPA, Impact BIO-2, which addresses permanent loss of biological resources, would be slightly less severe than under the Project. While the North-South Creek Segment of Tank Farm Creek and the East-West Channel would be retained in place, thereby reducing direct removal of riparian and wetland habitats, relocation of the Buckley Road

Class I bicycle path and bridge would result in the removal of additional wetland and riparian habitat. Compared to the Project, the MPA would reduce the loss of in-channel wetland habitat by 0.77 acre. However, under the MPA, the loss of isolated wetlands located within agricultural lands would increase by 0.11 acre more than the Project and the loss of riparian habitat would increase by 0.15 acre (see Table 5-13).

Table 5-13. Permanent Impacts to Wetlands and Riparian Areas

Feature Type	Impact Description	MPA Impact Area (acres)	Project Impact Area (acres)
In-Channel Wetland	Removal of North-South Creek Segment	0.17	0.41
	Removal of East-West Channel	0.00	0.53
	Drainage headwalls and aprons	0.04	0.04
Total		**0.21**	**0.98**
Isolated Wetland	Housing pads and roads	0.97	0.86
Total		**0.97**	**0.86**
Riparian	Pedestrian/bicycle bridges	0.31	0.06
	Storm water pipes	0.03	0.03
	Class I bicycle path	0.00	0.10
Total		**0.34**	**0.19**

Source: Althouse and Meade, Inc 2016; see Appendix Q.

The MPA and the Project include replacement of habitat removed and would occur using the following ratios: 3 to 1 acres of in-channel/federal wetlands, 1.5 to 1 acre of isolated wetlands/state, and 1.5 to 1 acre of riparian habitat.

In contrast to the Project, the MPA would result in a loss of habitat due to the relocation of the Class I bicycle lane along Buckley Road. This improvement would result in the loss of 0.31 acres of riparian and wetland habitat adjacent to Buckley Road. This may also include the loss of potentially suitable habitat for the California red-legged frog, western pond turtle, and southern steelhead trout. However, impacts to riparian and wetland habitats under the MPA would remain potentially significant but mitigable though application of MM BIO-2b, Biological Mitigation Plan; MM BIO-2c, replacement of riparian trees, wetlands, and riparian habitat; MM BIO-2e, stockpiling sufficient emergent vegetation; and, MM BIO-2i to hydroseed all bare disturbed soils for reducing erosion. For example, replacement of riparian habitat lost due to the bridge over Tank Farm Creek for the Buckley Road Class I bicycle path would occur up creek slightly in an area that currently lacks

sufficient viable riparian vegetation. All other mitigations listed under Impact BIO-2 would not be required under the MPA. Therefore, this impact is significant but mitigable.

Impact BIO-3 addressing wildlife corridors would be substantially less severe compared to the Project, as retention of the existing North-South Creek Segment and East-West Channel, and increased development setbacks from the creek would reduce impacts to special status species and wildlife movement through the creek corridor. The MPA would establish a typical creek/riparian canopy setback of 35 feet with a 20-foot minimum setback along no more than 700 linear feet. These setbacks would improve habitat and wildlife corridor connectivity adjacent to Tank Farm Creek. However, implementation of the MPA would still reduce overall connectivity through the Project site for wildlife due to more than 78 acres of urban development and associated roads, bridges and other infrastructure and loss of habitat. Development under the MPA would also continue to have potentially significant but mitigable impacts to special status species, such as the California red-legged frog, southern steelhead trout, western pond turtle, etc. Under the MPA, application of mitigation measures MM BIO-1a and -1b, MM BIO-2b, -2c, -2e, and -2i would ensure that such impacts would be mitigable. In addition, MM BIO-3a to conduct training for construction personnel, MM BIO-3b to address wildlife and special status species movement under the Biological Mitigation Plan, MM BIO-3c to protect the California red-legged frog, and MM BIO-3d to protect the western pond turtle would continue to apply.

Impact BIO-4 would be the same as the Project, as offsite improvements including the extension of Buckley Road and associated bicycle and pedestrian paths would also occur under the MPA and have the potential to create permanent impacts to special status species through removal of suitable habitat. Implementation of MM BIO-4 to address bat colonies for the Buckley Road Extension site within the Biological Mitigation Plan, in addition to MM BIO-1a, MM BIO-1b, MM BIO-3a, and MM BIO-3b, would be necessary to retain a significant but mitigable impact.

Impact BIO-5 addressing disturbance of habitat and species from MPA operation would be less than under the Project, however, increased light, noise, and increased human presence would also occur under the MPA. Impacts would be slightly reduced as the MPA includes larger creek setbacks that would set development and associated noise, light and glare further back from the creek corridor. However, the MPA would continue to have the potential to create significant impacts to biological resources during long-term operation, potentially resulting in sensitive species onsite fleeing the area, disruption in breeding/nesting cycles, and/or mortality. Implementation of MM BIO-5a to introduce

lighting restrictions near Tank Farm Creek and MM BIO-5b to ensure native vegetation is installed along the creek frontage in order to minimize light spillover would be necessary to retain a significant but mitigable impact.

Impact BIO-6 would be incrementally less than the Project, as the amount of grading would be reduced under the MPA by approximately 13,000 cy. As a result, the MPA would involve less potential erosion during rainy seasons in close proximity to Tank Farm Creek. Under the MPA, installation of retaining/flood walls at the toe of fill slopes at the setback along the creek corridor along the east side of the creek would improve erosion protection, reducing sedimentation. Though potential sedimentation would be reduced, continued extensive grading could degrade sensitive habitats downstream with offsite impacts to sensitive species, such as southern steelhead trout and California red-legged frogs. Impacts would be mitigated with implementation of MM BIO-6 to restrict all work in and within 100 feet of Tank Farm Creek, including work within the creek setback to occur outside the rainy season. In addition, implementation of mitigation measures MM BIO-1a and 1b, and MM HYD-1a through -1c would apply. Therefore impacts from construction of the MPA on offsite biological resources would retain a significant but mitigable impact.

Cumulative impacts would be significant but mitigable with implementation of all mitigation measures mentioned within this biological resources subsection.

Cultural Resources. Under the MPA, impacts to cultural resources would be similar to the Project. Extensive site preparation and grading would still occur within areas of known sensitive cultural resource remains. The dispersed nature of cultural resource remains over 15 acres of potentially developable area of the site would limit potential for avoidance while still achieving basic project objectives, particularly given other site constraints.

Impact CR-1 addressing impacts to the octagonal silo foundation would be similar to the Project, as construction of the Buckley Road Extension would also occur under this alternative with demolition of historical feature P-040-038310. This feature is not considered a significant historical resource or eligible for listing on the California Register of Historic Resources (CRHR), and this alternative would maintain an adverse but less than significant impact.

Impact CR-2, which addresses known prehistoric resource CA-SLO-2798/H, would be similar to the Project as extensive excavation, grading, and eventual residential development would occur within a known area of sensitive cultural resources. Under the MPA, avoidance of the cultural resource site CA-SLO-2798/H site would remain infeasible

due to the large scale of the site, dispersed remains, and other major site constraints that limit potential for Project redesign to avoid this cultural site. To illustrate, no development could occur outside the URL. Additionally, ALUP and City density restrictions within the ALUP Safety Areas and City Airport Overlay Zones (AOZs) and Tank Farm Creek required setbacks all constrain development and limit potential for redesign to avoid cultural resources, which appear to be dispersed across approximately 15 acres of the site at unknown densities. With implementation of MM CR-2a and MM CR-2b, which would ensure proper monitoring efforts and systematic grading practices, impacts would remain significant but mitigable.

Impact CR-3 addressing potential cultural resources would be slightly less severe than under than the Project as grading activities under the MPA would be reduced by approximately 13,000 cy. However, construction activities could continue to potentially uncover significant unknown prehistoric or historic archaeological resources. Construction of the Buckley Road Extension, roadway improvements, and utility easements, among other features that are generally similar in arrangement to the Project have the potential to encounter unknown prehistoric or historic archaeological deposits within the Project site and during offsite improvements. Due to the reduced amount of potential cut and fill within the Project site, the chance of encountering these resources is incrementally less than the Project. Implementation of the mitigation measures MM CR-3a and MM CR-3b, which require a cultural resource monitor and training for construction personnel, would ensure appropriate precautions to avoid potentially significantly impacts to unknown or undiscovered archaeological resources, resulting in significant but mitigable impacts.

Hazards and Hazardous Materials. Under the MPA, impacts related to hazards and hazardous materials would not substantially vary from the Project due to similar construction activities, and the amount and layout of development in relation to aircraft hazard areas. Impacts from hazardous materials and contamination during construction would remain similar to the Project, and no new hazards due to use of hazardous materials, increased exposure to airport safety hazards, or wildfire risk would occur.

Impact HAZ-1 related to exposure to hazardous materials during construction and operations would be similar to the Project, and still require implementation of MM HAZ-1, which would address safe removal of potential hazardous building materials and cleanup of contaminated soils. The alternative would continue to potentially expose persons to toxic, hazardous, or otherwise harmful chemicals based on the Project site's proximity to the Chevron Tank Farm property and contaminants. In addition, the potential presence of

asbestos containing material (ACM) within the offsite structures on the Buckley Road Extension site, and the past use of pesticides and herbicides within the Project site would remain a hazard during construction. Therefore, the potential would remain for construction workers and/or nearby occupants to be exposed to potentially toxic, hazardous, or harmful chemicals during excavation, grading, and site preparation activities. Inclusion of MM HAZ-1, implementation of the Health and Safety Plan, would reduce potential impacts to the construction workers and nearby general public associated with hazardous materials, and this would remain a significant but mitigable impact.

Impact HAZ-2 would remain similar to the Project, as the MPA site design would not create a hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Implementation of BMPs, site maintenance, and compliance with standards and regulations, as further discussed in Section 3.7, *Hydrology and Water Quality*, would reduce potential impacts related to routine transport, use, or disposal of hazardous materials to less than significant.

Impact HAZ-3 related to airport hazards would be similar to the Project, as MPA design and the location of residential uses would also adhere to the established AOZs and Airport Safety Areas as indicated within the LUCE and ALUP, respectively. Though residential unit densities would vary throughout the Project site, no residential development would be located within more restrictive City LUCE AOZs or Airport Safety Areas S-1B and S-1C, and the site layout would not exceed or conflict with any established airport safety standards. Therefore, similar to the Project, the MPA would be subject to review and approval by the ALUC for consistency with the ALUP. As further discussed in Section 3.8, *Land Use and Planning*, airport safety impacts to residents and commercial Town Center employees or patrons within the Project site would be less than significant.

Impact HAZ-4 addressing wildfire would be similar to the Project, as wildfires burning into open space surrounding the Project area could still occur with potential impacts related to exposing people or structures to wildfires. The acreage of open space with associated natural fuel risks would be greater under the MPA than the Project. However, compliance with California Building Code (CBC) and International Building Code (IBC) construction requirements for residences would continue to minimize any associated risks. Further, compliance with policies within the Safety Element would reduce the risk of damage or injury. In addition, the inclusion of the Interim Fire Station within the Project site, as well as eventual development of the Fifth Fire Station within the southern extent of the City, would result in the provision of additional fire protection services to respond to fire hazards

within the vicinity. This alternative would therefore result in less than significant impacts related to exposing people or structures to wildland fires.

Hydrology. Under the MPA, the realignment of the North-South Creek Segment of Tank Farm Creek and the burial of the East-West Channel would not occur. Wider setbacks would be implemented between Tank Farm Creek and proposed development, and the storm water collection swale along the northern boundary of the Project site would be widened and unpaved. These differences in the MPA from the Project would reduce adverse effects on water quality and hydrological systems. Overall, impacts identified within Section 3.7, *Hydrology and Water Quality* would be reduced compared to the Project.

Impact HYD-1 associated with increased erosion and sedimentation into Tank Farm Creek would be less than the Project, as there would be reduced construction within and along Tank Farm Creek due to the retention of the North-South Creek Segment and provision of wider creek setbacks during construction activities. In addition, under the MPA, one less storm water outfall would be constructed within the creek, reducing disturbance of creek channel banks and bottom and associated potential for water quality impacts due to erosion and sedimentation. However, potentially significant impacts to water quality due to polluted runoff during construction activities would continue to occur under the MPA due to grading and use of heavy construction equipment, which creates potential for sediment laden or polluted runoff to enter Tank Farm Creek. In addition, unlike the Project, the MPA would include installation of retaining/flood walls along portions of the creek channel and would result in additional construction activities taking place near the creek corridor, with added potential for excavation, soil disturbance and sedimentation due to operation of construction equipment near the creek channel. MM HYD-1a, which requires the submittal of a Notice of Intent (NOI) for discharge, MM HYD 1-b, which requires a SWPPP, and MM HYD-1c, which mandates that installation of all drainage outlets within Tank Farm Creek occurs during the dry season, would all apply to the MPA as well. Therefore, Impact HYD-1 under the MPA would remain significant but mitigable.

Impact HYD-2 regarding alteration of drainage patterns would be less severe than under the Project, since the MPA would not include realignment of Tank Farm Creek and both the North-South Creek Segment and the East-West Channel would remain in place. In addition, the North-South Creek Segment would be widened to accommodate increased flows entering the site from the northeast. In addition, MM HYD-2a, development of a

Drainage Master Plan, would apply. Overall, with implementation of the above mitigation, impacts under the MPA would be significant but mitigable.

Impact HYD-3 related to onsite flooding would be less severe than under the Project, since channel design under the MPA would be able to accommodate higher flood flows. The widening of the North-South Creek Segment under the MPA would allow the creek to carry greater offsite flows from properties to the north. The retention of the East-West Channel in the northeastern part of the site would also help to accommodate surface drainage from the east within the existing 100-year flood plain. In a change from the Project, the MPA would also include widening the proposed 1,600 foot-long collection swale along the northern site boundary by 8 feet. The swale would be unpaved, which would increase the ability to collect and convey surface water drainage under the MPA. Further, under the MPA, the proposed Jespersen Road Extension would be shifted east approximately 25 to 50 feet to accommodate the widened North-South Creek Segment, and a portion of Earthwood Lane would be shifted away from Tank Farm Creek to provide a wider buffer from the creek. These features of the MPA would reduce flooding impacts compared to the Project, but would still require mitigation measures to ensure that such flooding impacts do not remain significant. MM HYD-3a, which ensures that the Master Drainage Plan considers cumulative regional drainage and flooding impacts, and MM HYD-3b, which ensures that all modifications to the creek channels must comply with and receive of approval of the City, would also fully apply to the MPA.

However, in contrast to the Project, the 100-year floodplain offsite to the north of the Project site would not experience a reduction in the 100-year floodplain associated with potential Chevron Tank Farm improvements, and this area would continue to be subject to flooding (see Appendix Q); this region is already contained within the Federal Emergency Management Agency (FEMA) 100-year flood plain and is not considered a change from baseline conditions. Absent realignment of Tank Farm Creek to connect with the Chevron Tank Farm property, it is unclear how or whether these existing regional flooding and drainage issues can be resolved. However, overall, Impact HYD-3 would be significant but mitigable.

Impact HYD-4 related to the use of horizontal directional drilling (HDD) would be less severe compared to the Project. The MPA would also include use of HDD beneath Tank Farm Creek to install utility lines, which could impact water quality; however, MPA HDD activities would only occur at one location along the creek, compared to two locations under the Project. Due to the risk of frac-outs, MM HYD-4a, which requires a geotechnical

investigation for areas proposed for HDD, and MM HYD-4b, which requires the implementation of a Frac-out Contingency Plan, would also be necessary to mitigate this potential impact under the MPA. Therefore, Impact HYD-4 would be significant but mitigable.

Impact HYD-5, which addresses long-term impacts to water quality, would be slightly less severe when compared to the Project; however, long-term operation of the MPA would also impact the water quality in Tank Farm and San Luis Obispo Creeks due to polluted urban runoff and sedimentation. The MPA would contain wider creek setbacks that would incrementally reduce runoff, erosion and sedimentation from manufactured slopes; increased setbacks of the Class I bicycle path from the top of the creek bank would also incrementally reduce such impacts. Nonetheless, development under the MPA within the vicinity of the creek would still potentially produce increases in polluted urban runoff due to the increases in impervious surfaces and increased population within the site. MM HYD-2a, which requires a Master Drainage Plan, and MM HYD-5, which requires a Development Maintenance Manual, would also apply to the MPA. Therefore, Impact HYD-5 would be significant but mitigable.

Impact HYD-6 involving impacts to groundwater would be similar to the Project, as the MPA would result in impervious surfaces that would incrementally reduce areas for groundwater percolation. Like the Project, the MPA would also include a new dual use bioswale and pocket park in the southwest portion of the Project site to help offset the decreased percolation caused by the substantial increase in impervious surfaces with development of the site. The northern boundary collection swale would be widened and would be unpaved, which may also incrementally increase groundwater infiltration. Therefore, Impact HYD-6 would be less than significant.

Cumulative impacts to water quality would be similar to the Project, as the MPA would contribute to the cumulative trend of increased urban pollutant discharge to the San Luis Obispo Creek system. However, under the MPA, these impacts would be mitigated by water quality requirements and State Water Resources Control Board (SWRCB) regulations, and, therefore, would be less than significant. Unlike the Project, the MPA would not address cumulative regional flooding impacts due to discontinuation of realignment of Tank Farm Creek and associated hydrologic connections to the Chevron Tank Farm property to the north of the Project site. In not addressing such issues, the MPA may foreclose options for regional drainage improvements that would provide long-term solutions to area flooding. However, the MPA would not exacerbate such flooding and

would not contribute to this aspect of cumulative flooding impacts. Additional hydrological investigations may be required to determine the extent of cumulative drainage impacts.

Land Use and Planning. Under the MPA, the layout, acreage, and placement of residential units, parkland, roadways, and the Town Center with the Project site would differ slightly from the Project. However, the total number of resident units and square footage of Neighborhood Commercial uses would remain the same. Additional roadway, pedestrian, and bicycle improvements would be implemented under the MPA, which would improve consistency with applicable General Plan Circulation Element policies. Further, like the Project, the MPA would be consistent with standards that apply to City AOZs and ALUP Safety Areas. Overall, impacts identified within Section 3.8, *Land Use and Planning*, would be slightly less compared to the Project.

Impact LU-1 regarding consistency with LUCE-defined AOZs would be similar to the Project, as the MPA would also include residential uses that would be consistent with AOZ density and use restrictions and would not interfere with airport operations or create safety impacts. Like the Project, all residential units would be located either within AOZ-6 or outside the AOZs, both of which have no limitations on development intensity for either residential or non-residential uses (Table 5-14).

Table 5-14. Residential Units Proposed within AOZs

City's Airport Overlay Zone in Project Site	Allowable Densities	Project Site Designation (acres)	MPA Proposed Residential Units in Zone	Project Proposed Residential Units in Zone
AOZ-4 Outer Approach/ Departure Zone	Residential = Infill to average of surrounding density Non-Residential = 150-200 persons/acre	5	0	0
AOZ-6 Traffic Pattern Zone	No Limitations	142	712	712
Outside AOZ	No Limitations	3	8	8

Source: ALUC 2014.

The AOZs are designed to provide development standards that address airport safety consistent with the City's local authority. Given the location, type, and density of proposed development, the MPA would be consistent with the City's AOZs, and, therefore, land use compatibility impacts with the LUCE Airport policies, and associated AOZs would be less than significant.

Impact LU-2 regarding ALUP consistency would be similar to the Project, as development of the MPA would result in no construction of residential units within ALUP Safety Area S-1B or Safety Area S-1C, and would not conflict with allowable density permitted under the ALUP (Table 5-15). All residential development would fall within Safety Area S-2, which does not restrict residential density and would be consistent with standards for the current ALUP Safety Areas.

Table 5-15. ALUP Airport Safety Area Standards for Residential Densities[1]

ALUP Safety Area	Project Site Designation (approximate acres)	Maximum Land Use Density – Residential (units/acre)	Maximum Allowable Units in Safety Area on Project site	MPA Proposed Residential Units within ALUP Safety Area	Consistent with ALUP	Project Proposed Residential Units within ALUP Safety Area	Consistent with ALUP
S-1B	34.9	0.2	7	**Total: 0**	Yes	R-3: 7 **Total: 7**	Yes
S-1C	7.6	0.2	1.5	**Total: 0**	Yes	**Total : 0**	Yes
S-2	107.5	unlimited	unlimited	R-1: 101 R-2: 297 R-3: 197 R-4: 125 **Total: 720**	Yes	R-1: 105 R-2: 305 R-3: 178 R-4 : 125 **Total: 713**	Yes

[1] Airport safety zone standards are based on Clustered Development Zone project classification and Project/MPA compliance with a Detailed Area Plan that would be developed in consultation with ALUC and determined to be consistent with ALUP.
[2] Maximum density of residential land is unlimited with approved ACOS, and Clustered Development Zone (CDZ) and Development Area Plan.
Source: ALUC 2005.

Like the Project, the MPA would still continue to be subject to review by the ALUC, the MPA would be consistent with the LUCE AOZs, consistent with direction in the State Aeronautics Act, the FAA regulations, and guidance provided in the Caltrans California Airport Land Use Planning Handbook and the ALUP; therefore, no resultant substantial physical airport-related safety hazards would occur as result of MPA implementation, consistent with ALUP policies. As a result, airport land use planning impacts to residential and Neighborhood Commercial uses under the MPA would remain less than significant.

Regarding Impact LU-3, the MPA would achieve greater General Plan consistency than the Project as the MPA is more consistent with several General Plan policies designed to protect agricultural resources, biological resources, and ensures provision of adequate transportation, as further summarized below.

Agricultural Resources

Similar to the Project, the MPA would result in the conversion of 71 acres of agricultural land and is therefore subject to mitigation under Policy 1.9.2. MM AG-1 would satisfy the criteria of Policy 1.9.2, therefore making the MPA consistent with this policy after mitigation.

Biological Resources

In contrast to the Project, the MPA would not result in development within designated City creek setbacks, consistent with COS Element, Policy 7.7.9 and Section 17.16.025 of the City Zoning Regulations. The MPA would have less severe impacts to wildlife movement through the Tank Farm Creek corridor than the Project due to its increased development setbacks from the creek and its retention of existing creek features. However, the MPA's potential interference with wildlife passage through the creek corridor and depreciation in value as a wildlife corridor would still have the potential to be inconsistent with LU Policy 6.6.1, and COS Policies 7.3.3 and 7.7.8. Impacts to riparian and wetland habitats under the MPA would be significant but mitigable after implementation of MM BIO-2b, 2c, 2e and 2i, requiring a biological resources plan and monitoring. Therefore, impacts associated with COS Element policies under the MPA would also be significant but mitigable.

Traffic and Transportation

Unlike the Project, the MPA would include the extension of Horizon Lane north from the site connecting through to Suburban Road, along with improvements to Horizon Lane to attain City roadway standards for a residential collector, which would include intersection improvements to Horizon Lane and Suburban Road in order to achieve standards within the City Uniform Design Criteria and Municipal Code. This feature of the MPA would increase its policy consistency over the Project by ensuring these roadways meet Circulation Element maximum volume thresholds. The MPA would also provide connections to the regional bicycle network along the entirety of Vachell Lane. These improvements would achieve consistency with Circulation Element Policy 5.1.2, Sidewalks and Paths, as they would provide continuous bicycle access.

Unlike the Project, the MPA would establish an interim bus route during Phase 1 of development in order to accommodate site access limitations. These improvements would improve consistency with Circulation Element Policy 3.1.7, *Transit Service Access*, by facilitating access to transit service during all phases of development. In addition, the MPA would implement MM TRANS-4 to address pedestrian and bicycle lane deficiencies on Vachell Lane, Earthwood Lane, Horizon Lane, and Suburban Road; MM TRANS-10a

through 10c to improve pedestrian connectivity on South Higuera Street; and MM TRANS-12 to enhance coordination with SLO Transit. As a result, impacts would be significant but mitigable.

Cumulative impacts would be similar to the Project. Cumulative development is anticipated in the City's LUCE Update and would be consistent with City General Plan policies. The MPA, in combination with pending/future developments, is aligned with the City's plans for buildout as projected by the LUCE Update. After mitigation, the MPA would not have a cumulatively considerable effect on citywide land use and development. Therefore, like the Project, the MPA's cumulatively considerable impact to land use in combination with other pending/future projects would be less than significant.

Noise. Under the MPA, construction and operational noise impacts would be similar to the Project as overall development would be comparable. The MPA would include development of 720 residential units and 15,000 sf of Neighborhood Commercial uses, resulting in construction noise impacts. Operationally, the MPA would have a similar amount of traffic generation with associated mobile noise from increased vehicular traffic on area roads. The MPA would continue to avoid development of noise sensitive residential uses within airport noise corridors.

Under the MPA, Impact NO-1 addressing construction noise would remain similar to the Project, as construction activities and associated noise would remain similar within each phase over the 10-year construction period. Similar to the Project, MPA would generate short-term increases in noise that would exceed applicable standards in the City's Noise Ordinance from the use of heavy-duty construction equipment. Also, similar to the Project, noise impacts to nearby residences associated with grading and construction, including the Buckley Road Extension, would not exceed County standards. Impacts from heavy haul trucks along vicinity roads could also exceed maximum noise level criteria for mobile equipment, impacting sensitive receptors along haul routes. Implementation of MM TRANS-1, the Construction Transportation Management Plan, and mitigation measures MM NO-1a, MM NO-1b, and MM NO-1c, addressing construction noise, would help avoid impacts to sensitive receptors, including the use of noise emission restrictions, noise attenuation techniques, and resident notification of construction operations. Because estimated sound levels associated with construction activities would exceed the City's threshold for noise exposure during construction, even with mitigation, similar to the Project, onsite and offsite construction noise impacts would be significant and unavoidable.

Impact NO-2 would be similar to the Project, as short-term noise construction activities could potentially result in exposure of persons to excessive ground-borne vibration. As described above, construction under the MPA would follow a similar progression of development within the Project site, and vibrations would be temporary and intermittent during the hours of construction. Vibration would attenuate as the distance from the source increases would likely be at an imperceptible level to sensitive receptors. Therefore, vibration impacts from construction under the MPA would remain less than significant.

Impact NO-3 addressing mobile noise sources would be similar to the Project, as the MPA would generate a similar increase in traffic that would increase noise levels on roadways in the Project vicinity. As with the Project, projected generation of new ADT along area roadways would substantially increase noise levels along Earthwood Lane and Horizon Lane, with an associated increase of 13 dBA and above. However, noise levels would be below the 65 dBA exterior threshold and there are no identified sensitive receptors along the affected segments of Earthwood Lane and Horizon Lane. However, projected increases in ADT along Vachell Lane and Buckley Road are not expected to result in an increase greater than 3 dBA on these roads. Similar to the Project, although residential units associated with the MPA are not considered part of the baseline conditions for noise analysis under CEQA, residences have the potential to experience future noise levels above the City thresholds. To ensure interior noise levels are below the 45 dBA interior noise level threshold, mitigation of any potential outdoor activity areas for R-1 and R-2 residential units planned within 600 feet of Buckley Road as described in MM NO-3 would be necessary, making operational noise impacts significant but mitigable. Future R-2 and R-4 residences within the Project site near Earthwood Lane and Horizon Lane would not experience noise levels above the City noise thresholds given the distance to the roadway noise source.

Impact NO-4 addressing airport noise would be similar to the Project and less than significant, as no residential units are proposed within areas identified in the ALUP has having excessive airport noise (all applicable excessive noise contours are located in the S-1C and S-1B areas where no residential uses will be planned) under the MPA, though development within the Project site would still be exposed to some background airport noise.

Population and Housing. The MPA would facilitate similar levels of new residential development (720 units), and associated population increase (1,649 persons) as the Project. However, this alternative would reduce the number of low and medium density R-1 and R-

2 units to achieve desired Tank Farm Creek corridor objectives, and there will be an increase of 12 medium-high density R-3 units. In addition, the composition of inclusionary affordable housing units offered by the alternative would be similar to the Project to maintain consistency with City's Inclusionary Housing Requirements and Specific Plan Area Expansion Area Inclusionary Housing Requirements as indicated in Municipal Code 17.91; the exact number and distribution of affordable units would be determined during consideration and approval of the alternative by City decision-makers.

Under the MPA, Impact PH-1 addressing housing policy consistency would be similar to the Project and remain less than significant, as the residential development and associated population growth would be similar to the Project and would not exceed the adopted annual City growth rate of 1.0 percent under General Plan Policy LU 1.11.2.

Impact PH-2, which addresses the City's jobs-housing balance, would be similar to the Project and remain beneficial due to providing additional housing for the City that would have beneficial impacts related to the City's jobs-to-housing balance and assist in achieving the target jobs-to-housing rations of 1.5 to 1. The MPA's proposed construction of 720 units would provide additional housing for the existing and growing labor force within a community that is currently experiencing a 1.6 to 1 jobs-to-housing ratio. Therefore, this impact would be beneficial.

Impact PH-3 would be similar to the Project, as the MPA would adhere to the same requirements of the Specific Plan Area and Housing Element Policies as the Project. The distribution of inclusionary affordable units under the MPA between R-1 to R-4 housing options may differ due to the increase of R-3 units and decrease of R-1 and R-2 units; however, adherence to inclusionary housing requirements would maintain a less than significant impact.

Public Services. Under the MPA, the quantity of residential units introduced to the Project site would be the same as the Project, resulting in 1,649 estimated new residents. The new residents would increase demand for police protection, fire protection, parks, and schools, with impacts similar to the Project. The amount of parkland supplied under the MPA would be greater than the Project, which would directly benefit the new residents and comply with the City's parkland requirements.

Impact PS-1 relating to police services would be similar to the Project, as development within the Project site with up to 720 residential units would increase demand on the San Luis Obispo Police Department (SLOPD) for police protection services. Similar to the

Project, implementation of the alternative and associated increases in population may necessitate a need to hire two additional officers or purchase new police equipment to maintain adequate response time objectives. The Project proposes to fund public services through Community Facilities District (CFD) assessments. The City Council would address departmental budget, staffing, and equipment needs as part of the annual budgetary process, and determine precise timing of services and improvements. The MPA would contribute to general revenue from CFD assessments, sales taxes associated with local household expenditures and other revenue associated with residential development, as itemized in Tables 2-4 of the LUCE Fiscal Impact Analysis (plus revenues from the CFD) and such increases in revenues could be used to hire additional officers and purchase equipment to maintain or improve SLOPD service levels over time to meet changing demands, if determined appropriate by the City Council. MM PS-1, which requires a site security plan, would be implemented to relieve some demand for police services under the MPA, and this impact would remain significant but mitigable.

Impact PS-2 relating to fire protection services would be similar to the Project. Although the Project site is currently outside the 4-minute San Luis Obispo Fire District (SLOFD) response time, like the Project, the MPA would include an Interim Fire Station that would be utilized until the City's fifth fire station is constructed and fully operational. Further, the increased demand for SLOFD fire protection services would be satisfied by implementation of the Interim Fire Station, and inclusion of the Interim Fire Station would ensure compliance with the City's Safety Element's adequate response time performance standards. Therefore, impacts to fire protection services under this alternative would remain less than significant.

Impact PS-3 relating to public schools would be similar to the Project under the MPA, as development of 720 new residential units and the associated increase in population would generate increases in enrollment at public schools. This increase would mirror that of the Project, with a similar estimated quantity of additional students (approximately 262 students under the MPA, compared to 269 under the Project). Given district-wide capacity and the payment of impact fees for school facilities under the MPA, impacts on school facilities would be considered adverse but less than significant.

Table 5-16. MPA Student Generation

Grade Level	Generation Rates		Proposed Units		Additional Students
	Single-Family Units (students per unit)	Multi-Family Units (students per unit)	Single-Family Units	Multi-Family Units	
K-6	0.302	0.116	398	322	157.55
7-8	0.064	0.032	398	322	35.77
9-12	0.119	0.066	398	322	68.61
TOTAL (K-12)	**0.485**	**0.214**	**398**	**310**	**261.93**

Source: SLCUSD 2015.

Impact PS-4 relating to parkland availability would be slightly less than the Project. Approximately 16.49 acres of parkland would be required to meet City standards under Parks and Recreation Element Policy 3.15.1, and the MPA proposes 19.08 acres of parkland within the Project site. As the MPA includes approximately 3.08 acres of additional park space beyond the Project, the MPA would satisfy the amount of parkland required within 0.5 mile from residential neighborhoods. This increased quantity of parkland would surpass the 1.5-acre contribution or fee proposed by the Project, thus no longer requiring the payment of in-lieu fees. Accounting for in-lieu park fees under the Project, the MPA would ultimately provide 1.58 acres more parkland. Therefore, this alternative would comply with the City General Plan, Parks and Recreation Element and impacts to parks would remain less than significant.

Transportation and Traffic. The MPA would substantially reduce transportation and traffic impacts when compared to the Project. The primary factors that would contribute to this reduction in impacts would be the incorporation of 10 onsite and offsite road and transportation improvements into the MPA that are identified within mitigation measures in Section 3.12, *Transportation and Traffic* (see list below) and set forth in the Transportation Impact Study (TIS) (Appendix P).

Under the MPA, vehicular trip generation would remain similar to the Project with similar potential for transportation and traffic impacts. Adjustments in the mix of residential units under this alternative would incrementally reduce average daily trips (ADT) generation compared to the Project by approximately 7 trips from 6,776 ADT to 6,769 ADT, with approximately 405 of these trips occurring in the AM Peak Hour and 553 in the PM Peak Hour (refer to Table 5-17). In addition, the Applicant contends that an adjusted mix of uses in the Town Center would also reduce net new ADTs; however, this result cannot be confirmed until a final mix of uses is selected. Therefore, a conservative approach towards

trip generation is used for analysis of the MPA. Under the MPA, overall trip generation, distribution, and vehicle miles traveled (VMT) would be similar to the Project.

Table 5-17. Approximate Estimated Vehicular Trip Generation under the MPA

Land Use	Size	Daily Trip Rate	Number of Trips		
			Daily	Peak Hour	
				AM	PM
Low Density Housing (R-1)	101 units	10.46	1,057	83	110
Medium Density Housing (R-2)	297 units	5.56	1,652	126	150
High Density Housing (R-3 and R-4)	322 units	6.46	2,081	156	188
Neighborhood Commercial	15,000 sf	0.13	1,979	49	168
Net New Trips		--	6,769	414	616
Internal Capture Trips [2] Trips added to adjacent streets		--	-872 5,904	-8 406	-62 554

Source: Central Coast Transportation Consulting 2016; see Appendix P.
[1] Peak hour trips for the MPA are rough approximations based on the TIS, Appendix P.
[2] Internal trips refer to those that are retained within the Project site traveling between onsite uses (e.g., residents using parks or the commercial center). Internal capture estimates use ITE method for Average Daily Trips and NCHRP method for AM and PM trips.

As noted above (*Circulation*), the MPA would include key road and transportation improvements specifically designed to reduce congestion and travel impacts:

1. Turn restrictions on Vachell Lane/South Higuera Street under Phase 2 after the Buckley Road Extension is completed;

2. Restricted ingress and egress during Phase 1 at the Project site border on Venture Drive and the Vachell Lane/Earthwood Lane intersection, which would be removed under Phase 2, concurrent with the Buckley Road Extension;

3. Construction of an interim bus turn-around location within the Project site or other measures as deemed appropriate by the City to accommodate this interim transit access due to required site access limitations during Phase 1 construction; the roundabout at Venture Drive/Earthwood Lane has been designed to serve this purpose and no interim improvements should be needed.

4. Construction of Class II bicycle lanes that connect to the regional bicycle network along the entire stretch of Vachell Lane, between Buckley Road and South Higuera Street, as part of Phase 1 development;

5. Construction of Buckley Road frontage improvements from Tank Farm Creek to Phase 1 development from Vachell Lane to the Class II bicycle lane to bicycle path diversion, Phase 5 from the diversion up to and including the Jesperson/Buckley intersection, and the remaining portion with Phase 6;

6. Extension of the Jespersen Road/Horizon Lane connection as well as improvements to bring this road segment to City standards for a residential collector as part of Phase 4.

With incorporation of the above roadway and transportation improvements into the MPA, residual impacts would be similar to those identified in the TIS findings for Existing plus Project Conditions (refer to Tables 3.12-7, 3.12-8, 3.12-9, and 3.12-10 within Section 3.12, *Transportation and Traffic*; see Appendix P).

Impact TRANS-1 associated with construction traffic impacts would remain similar to those described under the Project, and implementation of a Construction Transportation Management Plan under MM TRANS-1 would reduce this impact to a less than significant level.

Impact TRANS-2 regarding trip generation during phased development would be reduced when compared to the Project due to inclusion of the transportation improvements described above into the MPA in appropriate Project development phases. Incorporation of these elements within the MPA would eliminate the need to implement MM TRANS-2b through MM TRANS-2f. However, MM TRANS-2a, which requires the development of a Transportation Improvement Phasing Plan, would still be applicable to the MPA in order to demonstrate consistency with the TIS findings and to specify design and timing of offsite traffic improvements. Therefore, Impact TRANS-2 would be significant but mitigable under the MPA.

Impact TRANS-3, which addresses proposed internal road circulation safety within the Project site, would be reduced from the Project, as the MPA would include traffic calming measures on all internal collector roadways to minimize potential turning movement conflicts at intersections, reduce vehicular speeds to improve safety, limit pedestrian and bicycle conflicts, and improve line of sight at driveways and intersections. This would eliminate the need to implement MM TRANS-3b. Further, Project site roadways and driveway design would be reviewed and approved by the City to ensure compliance with City engineering standards and best practices (e.g., aligning driveways on opposite sides of the roadway, positioning driveways as far upstream from intersections as possible) with

implementation of mitigation measure MM TRANS-3a. Therefore, this impact would be significant but mitigable under the MPA.

Impact TRANS-4, which addresses impacts to collector roads in the Project vicinity, would be similar to the Project, as ADT and trip distribution on Vachell Lane, Earthwood Lane, Horizon Lane, and Suburban Road are expected to be similar under both the MPA and Project as described in the TIS (Appendix P). Due to the increase in traffic volumes, these roadways would potentially exceed Circulation Element maximum volume thresholds, result in impacts to roadway and intersection operations, and result in pedestrian and bicycle path deficiencies. Application of MM TRANS-4 would require the development and implementation of an improvement plan for Earthwood Lane and Suburban Road, which would reduce this impact. Therefore, this impact would be significant but mitigable under the MPA.

Impact TRANS-5 regarding capacity at the Buckley Road/SR 227 intersection would be similar to the Project, as MPA-generated traffic would contribute towards increased delays at this intersection. MM TRANS-5, which requires the Applicant to provide a fair share contribution towards intersection improvements, would apply to the MPA. However, similar to the Project, while payment of the fair share contribution would help to offset the MPA's relatively minor contribution to impacts at this intersection, as a financing program for this improvement is not yet in place, impacts to the Buckley Road/ SR 227 intersection would remain significant and unavoidable under the MPA until improvements are designed, funded and completed by the County and/or Caltrans.

Under the MPA, Impact TRANS-6, which describes queuing at the South Street/Higuera Street intersection, would be similar to the Project. Implementation of mitigation measure MM TRANS-6, which includes extension of the northbound right-turn lane to provide more storage capacity to accommodate MPA-generated traffic, would reduce impacts to significant but mitigable.

Impact TRANS-7 regarding storage capacities at intersections along South Higuera Street would be reduced from the Project. The MPA would include offsite traffic improvements to facilitate acceptable LOS at the Vachell Lane/South Higuera Street and Suburban Road/South Higuera Street intersections. With the inclusion of improvements of these intersections, mitigation measures MM TRANS-7c and 7d would no longer be required. However, mitigation measures MM TRANS-7a, which requires intersection improvements at South Street/Higuera Street, and MM TRANS-7b, which requires intersection

improvements at South Higuera Street/Tank Farm Road, would continue to apply. Therefore, impacts would be significant but mitigable.

Impact TRANS-8, which addresses impacts to Los Osos Valley Road intersections, would be similar to the Project, as MPA-generated traffic would cause delays and exceedance of intersection capacities at several intersections along Los Osos Valley Road. Implementation of MM TRANS-8a and MM TRANS-8b, requiring the payment of Los Osos Valley Road subarea fee, the retiming of traffic signals at the Los Osos Valley Road/South Higuera Street intersection, and installation of signage at the South Higuera Street/Buckley Road intersection, would reduce impacts, resulting in a significant but mitigable impact.

Impact TRANS-9, which involves trip distribution along U.S. Highway 101, would be similar to the Project, as the MPA would result in similar trip generation and distribution along U.S. Highway 101. Accordingly, impacts would be less than significant.

Impact TRANS-10 regarding pedestrian LOS would be similar to the Project. The MPA would have a similar potential to degrade pedestrian LOS surrounding the vicinity resulting in unacceptable pedestrian operations due to the lack of pedestrian connectivity between the Project site and surrounding areas, including commercial and recreational uses. Similar to the Project, the MPA would exceed the City's multi-modal threshold of significance for pedestrian LOS at South Higuera from Buckley Road to Los Osos Valley Road, Vachell Lane/South Higuera Street intersection, and Suburban Road from South Higuera Street to Earthwood Lane. Implementation of MM TRANS-10a through -10c would reduce this impact with the installation of sidewalk segments and ADA ramps on South Higuera Street and Suburban Road; therefore, this impact would be to significant but mitigable.

Impact TRANS-11 regarding the adequacy of bicycle facilities would be reduced from the Project under the MPA. Relocation of the Buckley Road Class I bicycle path to run parallel to Buckley Road would improve on-road cycling safety and connectivity and ensure consistency with the Bicycle Transportation Plan (BTP) and Circulation Element policies regarding bikeway connections. This would allow cyclists travelling along the Buckley Road westbound Class II bicycle path to migrate to the Class I bicycle path at the terminus of the Class II path at the Tank Farm Creek Bridge. Impacts would therefore be less than significant.

Impact TRANS-12, which concerns transit service demand, would be similar to the Project, as the MPA would generate a similar demand on transit services. Implementation of MM

TRANS-12, which requires coordination with SLO Transit and payment of fair share costs towards improvements in transit service and any physical improvements needed to accommodate the new bus routes within the site, would reduce impacts. Accordingly, overall impacts would be significant but mitigable.

Under near term conditions, Impact TRANS-13 would be similar to the Project, where MPA-generated traffic would cause delays and exceedance of storage capacities at Buckley Road/SR 227 and Los Osos Valley Road/South Higuera Street intersections, contributing to road segment congestion. Implementation of MM TRANS-13, which requires the Applicant to pay its fair share fees to fund the improvements, would mitigate the MPA's contribution to this impact, making this impact significant but mitigable similar to the Project.

Under near-term conditions (post-Phase 4 of MPA development), Impact TRANS-14 would be similar to the Project, where the MPA would incrementally contribute to cumulative increases in demand for bicycle and pedestrian facilities, degrading operations of these facilities and potentially conflicting with the City's BTP regulations and General Plan thresholds. In particular, the MPA would incrementally contribute towards the decrease in LOS for bicycle facilities at the intersections of South Higuera Street/Tank Farm Road, and Buckley Road/ South Higuera Street, and for pedestrian facilities on some segments of South Higuera Street. MM TRANS-14, which requires fair share payment of fees for the installation of a Class I bicycle path connection and continuous pedestrian facilities at the Buckley Road/South Higuera Street intersection to Los Osos Valley Road/U.S. Highway 101 southbound ramps intersection, would apply to the MPA. This would reduce impacts to significant but mitigable similar to the Project.

Similar to the Project, under long-term cumulative conditions, the MPA would contribute towards to potentially significant impacts to the operational conditions at four intersections: 1) Prado Road/South Higuera Street; 2) Tank Farm Road/South Higuera Street; 3) Tank Farm Road/Horizon Lane; and, 4) Buckley Road/SR 227. Similar to the Project, implementation of MM TRANS-15b and -15c would reduce the MPA's contribution towards cumulative impacts at Tank Farm Road/South Higuera Street, and Tank Farm Road/Horizon Lane to less than cumulatively considerable. However, after implementation of MM TRANS-15a and 15d, the MPA's cumulative contribution to impacts at the Prado Road/South Higuera Street and Buckley Road/SR 227 intersections would be significant and unavoidable, similar to the Project, as these measures are not currently included in any fee program.

Utilities. Under the MPA, similar activities involving installation of public utilities and associated trenching would occur to support residential and Neighborhood Commercial development. The MPA would facilitate similar levels of new residential development (720 units), and associated population increase (1,649 persons) as the Project. However, this alternative would reduce the number of low and medium density R-1 and R-2 units in favor of a small increase of 12 medium-high density R-3 units. The alternate range of unit types would change the demand for utilities and service system, including the amount of estimated water demand and wastewater flows that would need to be accommodated under this alternative. Based on the below analysis, transitioning to more multi-family units under the MPA would generally result in an incremental decrease of estimated necessary wastewater capacity, energy, and solid waste production compared to the Project. In addition, more parkland under the MPA would slightly increase demand for water, although parks would be irrigated using the proposed recycled water system. The abandonment of the onsite well and installation of a new the onsite well for agricultural irrigation would also increase groundwater use by the MPA.

Impact UT-1 regarding wastewater generation would be incrementally less than the Project, as implementation of the MPA would result a similar amount of development with a similar increase in demand for wastewater collection and recovery facilities. Using wastewater generation factors provided by the City's LUCE, the MPA is estimated to produce approximately 0.10 million gallons per day (MGD) of increased wastewater flows (approximately 540 gallons per day less than the proposed Project), resulting in an incremental decrease to wastewater flows. As noted in Section 3.13, *Utilities*, this reduced quantity would not produce a significant increase in demand for wastewater treatment. Also, similar to the Project, payment of development impact fees as part of standard conditions for approval would ensure that the Applicant pays a fair share of costs associated with the wastewater treatment infrastructure needed to serve the development and ensure adequate Water Resource Recovery Facility (WRRF) capacity. Therefore, impacts to wastewater facilities would remain less than significant.

Table 5-18. Wastewater Projections Resulting from the MPA.

Land Use	Mitigated Project Alternative Proposed Development	Wastewater Generation Factor[1]	Wastewater Flow
Single-Family	398 units	150 gallons/unit/day	59,700 gallons/day
Multi-Family	322 units	105 gallons/unit/day	33,810 gallons/day
Commercial	15,000 sf	60 gallons/1,000 sf/day	900 gallons/day
Total (Gallons)	--	--	94,410 gallons/day
Total (MGD)	**--**	**--**	**0.10 MGD**

[1] City of San Luis Obispo 2014a.

Impact UT-2 regarding utility installation impacts would be less than the Project. The MPA would require the expansion of utility infrastructure, including water, sewer, gas, and electricity into the site to serve new development; however, the MPA utility layout includes modifications to reduce potential impacts. Construction of these items would follow a similar process as the Project, which would have similar associated environmental effects as described within Section 3.13, *Utilities*. These potential adverse actions include trenching and installation of utility-scale pipelines, HDD boring under Tank Farm Creek with the potential for frac-outs, in addition to noise and traffic impacts, especially on Vachell Lane and Venture Drive near sensitive land uses. However, under the MPA, HDD boring would only occur at one location along the creek rather than two locations under the Project. There would also be one less drainage culvert than the Project, resulting in reduced impacts within the creek channel. To reduce the potential for significant impacts, the MPA would require inclusion of mitigation measures within other resource sections including: MM AQ-1a, Construction Activity Management Plan; MM BIO-1a, Biological Mitigation Plan; MM BIO-1b, environmental monitor; MM CR-2a, systematic grading; MM CR-2b, cultural resource monitor; MM CR-3a, stopping work upon discovery of a buried cultural resource; MM CR-3b, cultural resource training; MM HAZ-1, Health and Safety Plan for earthwork activities; MM HYD-4a, geotechnical investigations for HDD activities; MM HYD-4b, Frac-out Contingency Plan; and MM TRANS-1, Construction Transportation Management Plan. In addition MM UT-2, which requires review and approval of utility improvements by the City's Public Works and Utilities Departments, would be implemented. Therefore, similar to the Project, impacts to the environment associated with onsite and offsite utility line installation would be significant but mitigable.

Impact UT-3 regarding water demand would be incrementally greater than the Project. For potable municipal water, implementation of the MPA would result a similar amount of development with a similar increase in demand for the City's potable water supply, but

with more irrigated parkland. The WSA estimated total water demand from the Project to be 127.7 AFY (see Appendix Q); using the City's more conservative water use factors within the 2015 Urban Water Management Plan (UWMP), the MPA is estimated to have a water demand of approximately 193.4 AFY (see Table 5-19), which is 5.55 AFY more than the Project (Project estimates 187.85 AFY). While the MPA would result in an increased water demand compared to the Project, this demand is due to an increased acreage of parkland (32 AFY for the Project, and 38.2 AFY for the MPA; see Table 5-19). Additionally, the 5.55 AFY difference associated with the MPA could be accommodated by the existing recycled water supply system. To address this issue, the MPA includes measures to ensure landscaping water efficiency, consistent with the City's General Plan policies and similar to the Project.

Further, the MPA would include 27 acres of irrigated agricultural land. Based on a water use factor of 3 AFY per acre, this would result in a water demand of 81 AFY of groundwater in addition to the 193.4 AFY or municipal water sources for developed uses. However, historically, given the relatively higher water demand associated with irrigated agricultural crop production, water demand for the 140 acres of active onsite agricultural land equates to approximately 420 AFY. Overall, the water usage under the MPA would be reduced from long-term historic water use on this site. Therefore, groundwater for irrigation would be sufficient to meet the MPA's demand.

As described in Section 3.13, *Utilities*, under current conditions, there is 6,007 AFY of reserve water supply available for new development. Therefore, based on MPA-related water demand estimates, the Project would require approximately 5.5 percent of the water available. At LUCE buildout, the City is estimated to have approximately 4,680 AFY of reserve water supply available and the MPA would require approximately 7 percent of the remaining amount of water anticipated to be available at buildout. Since the existing and future water supply would be sufficient to serve the MPA's estimated demands, impacts to the City's water supply would be considered adverse but less than significant. Development of the Project site would also require payment of water impact fees to the City. Therefore, impacts to the City's water supply would remain less than significant.

Table 5-19. Estimated MPA Water Demand based on City Water Use Factors

Areas	Quantity	Use Factor[1]	Demand (AFY)
R-1	101 units	0.3 AF/unit/day	30.3
R-2	297 units	0.21 AF/unit/day	62.4
R-3/R-4	322 units	0.18 AF/unit/day	58.0
Neighborhood Commercial	15,000 sf	0.3 AF/1,000 sf/year	4.5
Parkland	19.08 acres	2 AF/year	38.2
TOTAL	**--**	--	**193.4**

Note: AFY = acre-feet/year sf = square feet
[1] Use factors based on historical water usage rates for similar land uses in the City.
Source: Cannon 2016.

Impact UT-4 regarding solid waste generation would be similar to the Project. The MPA would generate a similar quantity of solid waste for disposal at the Cold Canyon Landfill. The MPA would contribute an estimated 2.82 tons per day of solid waste, or 0.03 less than the Project (estimated 2.85 tons per year; see Table 5-20). The estimated waste from R-1 and R-2 residential units would be slightly reduced, and waste from R-3 residential units would increase compared to the Project, due to the distribution of housing under the MPA. Based on the daily solid waste projections and similar to the Project, the MPA would contribute approximately 0.1 percent of the potential daily waste capacity of Cold Canyon Landfill. The waste produced by the MPA would not substantially affect the landfill's capacity or ability to comply with federal, state, or local regulations. Therefore, impacts regarding the generation of solid waste by the MPA would remain less than significant.

Table 5-20. Estimated Solid Waste Production under the MPA

Land Use	Proposed Uses	Quantity (# of Units)	Waste Generation Factor	Waste Generation (lbs/day)
Residential	R-1 (Single Family)	101	9.8 lb/day/unit	989.8
	R-2 (Single Family)	297	9.8 lb/day/unit	2,910.6
	R-3 (Multi-Family)	197	5.31 lb/day/unit	1,046.07
	R-4 (Multi-Family)	125	5.31 lb/day/unit	663.75
Neighborhood Commercial	Retail, local services, or outdoor dining	15,000 sf	2.5 lb/1000 sf/day	37.5
Estimated Total Waste Generation (lbs per day)			**5,647.72**	
Estimated Total Waste Generation (lbs per year)			**2,061,418**	
Estimated Total Waste Generation (tons per day)			**2.82**	
Estimated Total Waste Generation (tons per year)			**1,030.7**	

Source: CalRecycle 2013a; 2013b; 2013c.

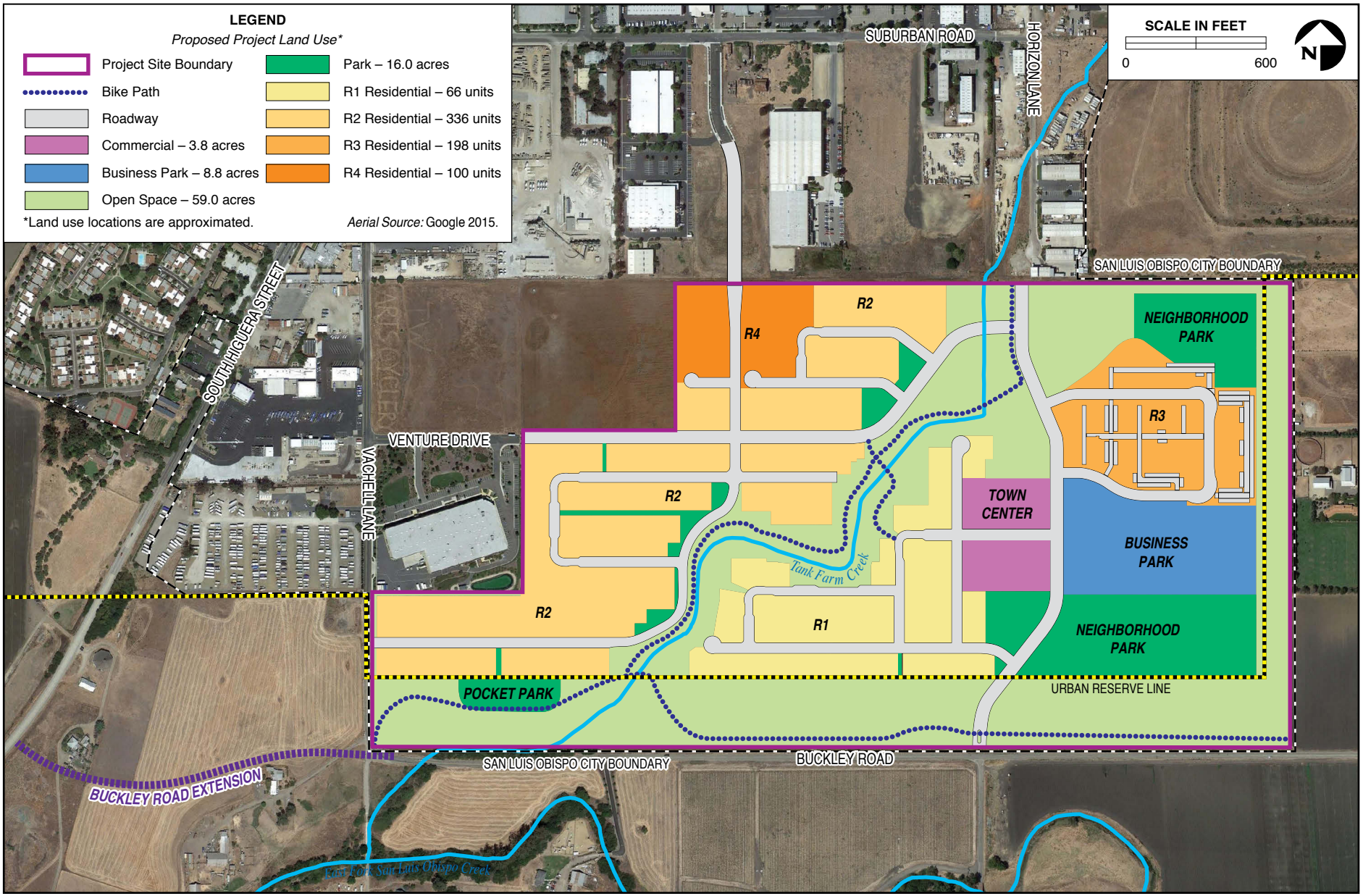
5.4.2.3 Residential Plus Business Park Land Use Alternative

This alternative would combine development of the site as a residential area with development of the site as a business park with supporting commercial development. This alternative would provide for development of a business area, following the site's current zoning for "BP-SP", or Business Park – Specific Plan, encouraging employment growth in the eastern region of the Project site. The residential component of the alternative would allow up to 700 units, located in the western and northeastern regions of the Project site, contained within ALUP Safety Areas S-1C and S-2.

Tank Farm Creek Alignment and Riparian Corridor

The Residential Plus Business Park Land Use Alternative would result in avoidance or reduction of potentially significant impacts to hydrological and biological resources by maintaining the existing creek realignment rather than the creek alterations and relocation as proposed within the Project. Unlike the Project, this alternative would generally maintain the current creek alignment, with a minor modification at the current junction of the North-South Creek Segment with the diagonal branch to form a better angle compared to the existing sharp bend between the two branches, as depicted in Figure 5-4. Similar to the Project, this alternative would not remain consistent with the City policies guiding 20-foot setbacks from Tank Farm Creek, and some property lot lines would extend into the 20-foot setback area. Also similar to the Project, the East-West Channel within the Project site would be realigned around the proposed medium-high density residential development, and would avoid the proposed business park area. Southerly flows from the Chevron Tank Farm's southern border and future alterations in southerly flow from potential offsite Chevron improvements would likewise be directed towards the relocated channel and associated culvert. As such, this alternative would consist of incrementally less habitat disturbance and long term alterations than the Project.

The existing North-South Creek Segment would be able to accommodate some residual runoff from the light industrial properties to the north. A proposed 12-foot wide drainage swale along the northern border would also function to direct some runoff into the North-South Creek Segment; this alternative would reduce the number of subsurface drainage culverts required to convey runoff 600 feet south to Tank Farm Creek.



amec foster wheeler

Conceptual Residential Plus Business Park Land Use Alternative

FIGURE 5-4

Riparian buffers adjacent to the creek would be similar to the Project. Similar to the Project, grading outside of this riparian corridor would allow for accommodation of 100-year flood events. The proposed Tank Farm Creek Class I bicycle path would continue to be within the riparian corridor boundary, located proximate to the creek's natural vegetation. The Project's proposed dual pock park/bioswale within the southern border would likewise be implemented under this alternative.

Housing Units

Similar to the Project, housing would range from traditional single-family homes to higher density multiple-unit complexes, enabling a mix of residential arrangements, lot sizes, intended income levels, and densities similar to that described in Section 2.6, *Project Overview*. Unlike the Project, this alternative would not require a density bonus for implementation. Additionally, this alternative would facilitate development of 700 units, and would not push the limit of maximum du/acre allowances, allowing more room for private open spaces within residential properties. Also similar to the Project, the alternative would intermittently adhere to setback and open space buffer requirements, although without mitigation this alternative would not maintain the necessary setbacks throughout the entire length of the Tank Farm Creek riparian corridor. The quantity and total acre coverage by each residential land use would be as detailed below and as summarized in Table 5-21:

- Proposed 66 R-1 single-family units would occupy approximately 11.3 acres and comprise 9.4 percent of all residential units. Compared to the Project, this would be a reduction of 39 units and 6.15 acres of R-1 coverage.
- Proposed 336 R-2 single-family units would comprise approximately 48.0 percent of the proposed residential units over an area of 36.4 acres. Compared to the Project, this would be an increase of 31 units and 1.37 acres of R-2 coverage.
- Proposed development of 198 R-3 multi-family units would constitute 28.3 percent of the planned residential development onsite over 10.0 acres of medium-high density residential land uses. Compared to the Project, this would be an increase of 13 units and a decrease of 1.04 acres of R-3 coverage.
- Proposed development of 100 R-4 multiple-family units would constitute approximately 14.3 percent of the planned residential development onsite over 4.7 acres. Compared to the Project, this would be a decrease of 25 units and 0.06 acres of R-4 coverage.

Table 5-21. Housing Proposed under Residential Plus Business Park Land Use Alternative

Housing type	Maximum Units/Acre[2]	Total Proposed Units	Acres covered	Estimated Population[1]
R-1 Single-family	7	66	11.3	151
R-2 Single-family	12	336	36.4	769
R-3 Multi-family	20	198	10.0	453
R-4 Multi-family	24	100	4.7	229
TOTAL	**N/A**	**700**	**62.4**	**1,603**

Development within ALUP Airport Safety Areas and AOZs

Under this alternative, no residential units would be located within the S-1C ALUP Safety Area, in the northeastern Project area, and 198 R-3 units and 38 R-2 units would be located within the S-1B ALUP Safety Area, adjacent to the Town Center. Finally, 100 R-4 units, 298 R-2 units, and 66 R-1 units would be located within the S-2 ALUP Safety Area. The ALUP Safety Areas have more restrictive development intensity allowances than City AOZs within the Project site (for instance, 75 persons per acre are permitted within ALUP Safety Area S-1B whereas 150 persons per acre are permitted within City AOZ-4, where each development intensity allowance areas would overlap portions of the proposed business park area).

In relation to the City's AOZs, this alternative would be consistent with development standards and allowed uses and densities within the AOZs. Similar to the Project, no residential units are proposed within AOZ-4. However, approximately 1 acre of the proposed Business Park uses would be within this zone. AOZ-6 would overlay the majority of the site and associated development, which includes the Town Center, up to all 700 residential units, the Neighborhood Park, open space, and the portion of the Business Park not within AOZ-4.

Town Center and Business Park

This alternative would increase the Neighborhood Commercial buildout to 35,000 sf with development over 3.77 acres, compared to the Project's 15,000 sf of Neighborhood Commercial development. Also unlike the Project, this alternative would include 120,000 sf of Business Park development over approximately 8.83 acres in the eastern region of the park, located south of the R-3 development. Accounting for all residential, Neighborhood

Commercial, and Business Park acreage, approximately 75.0 acres would be developed within the Project site under this alternative.

Parks and Open Space

This alternative would provide a similar amount of park space and a decreased amount of open space compared to the Project, with at least 16.0 acres of park space consistent with LUCE Policies 3.13.1 and 3.15.1, and approximately 59.0 acres of open space.

Analysis – Residential Plus Business Park Land Use Alternative

Impacts under the Residential Plus Business Park Land Use Alternative would be greater than that of the Project. Primary tradeoffs would consist of higher intensity buildout of Business Park and Town Center, resulting in increased impacts to land use policies, air quality and GHG emissions, and traffic and transportation. The addition of Business Park uses in combination with an incremental decrease in housing would result in greater impacts to population and housing within the City. The major creek realignment would not occur, resulting in preservation of existing biological and hydrological resources; however, relocation of the East-West Channel and substandard setbacks similar to the Project would result in adverse impacts of this alternative on biological and hydrological resources. Due to increased buildout and decreased amounts of open space, potential impacts to visual and aesthetic resources and cultural resources would be greater than the Project, and potential impacts from hazardous resources would be greater than the Project.

Agricultural Resources. Since development is proposed in similar areas under this alternative as the Project, impacts to agricultural resources, such as a loss of prime soils, would be similar to the Project. Similar to the Project, the prime soils located along the southern buffer would still be preserved under this alternative.

Air Quality and GHG Emissions. An increase in vehicle trips to the area would likewise increase potential air quality and GHG emission impacts under this alternative, compared to the Project. For instance, the increased maximum buildout under this alternative would result in an increase of construction emissions. Additionally, long-term development of residential and neighborhood commercial uses would result in an estimated increase of approximately 2,807 ADT compared to the Project. Associated air quality and GHG emissions from this increase would likewise increase and result in an increased intensity of air quality and GHG emission impacts. Impacts to air quality and GHG emissions under this alternative would remain above thresholds and be inconsistent with the 2001 Clean Air Plan, resulting in significant and unavoidable impacts.

Biological Resources. Because the creek would not be substantially realigned as the Project proposes, impacts to biological and hydrological resources associated with Tank Farm Creek along the North-South Creek Segment would be reduced. By maintaining the existing Tank Farm Creek alignment, some impacts identified within Sections 3.4, *Biological Resources* would be avoided, including preservation of the cottonwood species along the North-South Creek Segment. However, similar to the Project, relocation of the East-West Channel and disturbance of the adjacent wetland area would result in detrimental biological and hydrological impacts.

Hydrology and Water Quality. While this alternative would retain the existing North-South Creek Segment alignment, the East-West Channel would be removed, and as such would alter drainage within the eastern portion of the Project site. This would require mitigation as listed within Section 3.7, *Hydrology and Water Quality* in order to direct runoff and flows from lands adjacent to the east of the site. By retaining the existing Tank Farm Creek alignment, existing hydrological issues would not be addressed and may be more difficult to resolve in the future, including ongoing flood risk to the north of the Project site. Further, additional hydrological investigations that analyze drainage in conjunction with any proposed creek realignment upstream within the Chevron Tank Farm property would be required to determine how best to resolve regional drainage issues and identify appropriate recommendations.

In addition, under this alternative and similar to the Project, development including the Class I bicycle path, building pads, and nearby roadways would continue to be within close proximity (e.g., less than 50 feet) to Tank Farm Creek. As such, impacts related to erosion and runoff would be similar to the Project, and would require mitigation.

Land Use. Impacts to land use and planning would be greater than that of the Project. As stated above, this alternative would result in 700 units within the Project site, which unlike the Project would comply with the maximum capacity for SP-4 area under the LUCE, without a necessary density bonus allowance. While a density bonus provides additional housing units, increased demand upon services and resources would typically result. However, a General Plan amendment may be required as this alternative exceeds the maximum sf of Neighborhood Commercial uses allowed under the LUCE and contains additional Business Park uses. The alternative would offer a comparable amount of affordable, higher density housing for the City as the Project. Also similar to the Project, the locations of the residential units, Neighborhood Commercial, and Business Park development would partially comply with ALUP Safety Area standards for unit and

persons densities, as shown below in Table 5-22. However, this alternative would be consistent with development standards for the City's AOZs (see Table 5-23).

Table 5-22. ALUP Safety Area Standards for Unit or Persons Densities[1]

ALUP Safety Area	Project Site Designation (approximate acres)	Maximum Land Use Density	Maximum Allowable Units (or Persons) in Safety Area on Project site	Proposed Quantity of Units or Persons within Safety Airport Safety Area	Consistent with ALUP
S-1B	34.9	0.2 units/acre (or 75 persons per acre for non-residential)	7 (or 2,618)	Units: 7 Persons: 282[3]	Yes
S-1C	7.6	0.2 units/acre (or 120 persons per acre for non-residential)	1.5 (or 912)	Units: 0 Persons: N/A	Yes
S-2	107.5	unlimited	unlimited	Units: 693Persons: N/A	Yes

[1] ALUP Safety Area standards are based on Clustered Development Zone project classification and Project compliance with a Detailed Area Plan that would be developed in consultation with ALUC and determined to be consistent with ALUP.
[2] Maximum density of residential land is unlimited with approved ACOS, and Clustered Development Zone (CDZ) and Detailed Area Plan
[3] Estimated number of persons by assuming 550 square feet per job as discussed in Section 3.10, *Population and Housing*, for 120,000 sf of business park development and 35,000 sf of neighborhood commercial development. However, additional customers and visitors may raise this value.
Source: ALUC 2005.

Table 5-23. Consistency with AOZs

City's Airport Overlay Zone in Project Site	Allowable Densities	Project Site Designation (acres)	Proposed Residential Units in Zone
AOZ-4 **Outer Approach/ Departure Zone**	Residential=Infill to average of surrounding density Non-Residential=150-200 persons/acre	5	0 (Consistent)
AOZ-6 **Traffic Pattern Zone**	No Limitations	142	+/-700 (Consistent)
Outside AOZ	No Limitations	3	0 (Consistent)

Source: (ALUC 2014).

Provisions for more affordable housing opportunities and a mix of housing affordable to various economic strata are intermixed, per Goal 4 of the City's Housing Element. Also similar to the Project, development of approximately 75.0 acres of the 150.0-acre area would be consistent with maintaining a 50 percent development balance between open space and development within the Project site. Unlike the Project, the proposed Business Park area and associated 120,000 sf of development would not be consistent with SP-4 land uses, despite the existing zoning for BP-SP. As such, inclusion of the Business Park area

would require additional approvals of tract layout and use, and possibly require a General Plan amendment. Further, an increased amount of architectural review and planning effort would be necessary under this alternative's implementation, and would overall result in greater land use impacts than the Project.

Noise. Even with implementation of applicable mitigation measures, City noise thresholds for noise-sensitive residential uses approximately 100 feet from construction vehicle routes may be temporarily exceeded during construction activities under this alternative. Additionally, the higher total buildout intensity would result in more noise impacts during construction activities and would incrementally increase operational ambient noise levels. Therefore, the intensity of significant and unavoidable noise impacts as identified in Section 3.9, *Noise*, would be more than the Project under this alternative, and remain significant and unavoidable.

Population and Housing. Impacts to population and housing would be similar to the Project; there would be incrementally less population growth within the Project site but would further offset the City's jobs/housing balance. With buildout of 700 units under this alternative, and assuming the Citywide household size of 2.29 persons per household, this alternative would be expected to increase the City's population by approximately 1,603 persons, or 46 persons less than that estimated for the Project and thus an incremental difference. Assuming 550 sf per job, the 35,000 sf of Neighborhood Commercial and 120,000 sf of Business Park development would introduce approximately 282 new jobs to the Project site.

Implementation of this alternative would result in an incremental decrease in housing opportunities compared to the Project as described in the preceding paragraph, in favor of more R-2 and R-3 units. Combined, there would be a reduction of 12 R-3 and R-4 units, which would result in an incremental reduction of potential lower cost housing opportunities; nevertheless, this alternative would still result in a similar amount of affordable housing units. Ultimately, the decrease in housing opportunities would have an associated decrease in job housing support compared to the Project. The estimated increase of approximately 282 jobs provided by the 35,000 sf of Neighborhood Commercial and 120,000 sf of Business Park development would further offset the jobs/housing balance for the City.

Public Services. This alternative would result in similar public service impacts due to a slight reduction in demand associated with the reduced number of potential residential population and buildout, though an increased amount of public service demand associated

with Neighborhood Commercial and Business Park development. Similar to the Project, an Interim Fire Station would be constructed to provide on fire protection services to the Project site.

Transportation and Traffic. The Residential Plus Business Park Land Uses Alternative would have greater traffic and transportation impacts than the Project. For this alternative, three primary factors which contribute to total estimated trip generation were examined: 1) greater Neighborhood Commercial buildout; 2) the proportion of R-1, R-2, R-3, and R-4 units within the Project site; and, 3) the Business Park component. Central Coast Transportation Consulting conducted an analysis of these components, with the following results:

Table 5-24. Estimated Net New Daily Trips under Residential Plus Business Park Land Uses Alternative

Land Use	Total Proposed Quantity	ADT
Low Density Housing	66 units	717
Medium Density Housing	336 units	1,846
High Density Housing	298 units	1,929
Neighborhood Commercial	35,000 sf	3,432
Office Park	120,000 sf	1,659
Net New Trips		**9,583**

Source: Central Coast Transportation Consulting 2015.

Considering the adjusted proportion of R-1, R-2, R-3, and R-4 units, Neighborhood Commercial buildout, and business park development within the Project site under this alternative, the alterations would greatly increase the total added ADT of the alternative compared to the Project by approximately 2,807 ADT (from 6,776 ADT to 9,583 ADT). Therefore, the Residential Plus Business Park Land Uses Alternative would greatly increase the potentially significant and unavoidable traffic and transportation impacts compared to the Project.

Utilities. Impacts to utilities would be greater than the Project, due to the increased amount of overall buildout and increased Neighborhood Commercial and Business Park uses within the Project site compared to the Project. However, with 700 units requiring water, wastewater, solid waste, instead of 720, impacts to utilities would be less than the Project for the residential component.

5.5 IDENTIFICATION OF ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Section 15126.6(e)(2) of the State CEQA Guidelines indicates that an analysis of alternatives shall identify an environmentally superior alternative among the alternatives evaluated in the EIR. In general, the environmentally superior alternative as defined by CEQA should minimize adverse impacts to the Project site and its surrounding environment.

Table 5-25 summarizes the environmental advantages and disadvantages associated with the proposed project and the analyzed alternatives. CEQA Guidelines section 15126.6 states that if the environmentally superior alternative is the No Project Alternative, the EIR shall also identify an environmentally superior alternative from among the other alternatives.

Although No Project Alternative A would result in the least amount of impacts, No Project Alternative B would continue to result in significant and unavoidable impacts. Thus, none of the alternatives analyzed would reduce any of the Project's significant and unavoidable impacts (air quality, construction noise, public services and traffic) to a level below significance thresholds. Given this, the *Mitigated Project Alternative* is considered to be the environmentally superior alternative since impacts would be reduced for most issue areas and all Project objectives would be met. The Mitigated Project Alternative would result in the fewest impacts to the following resource areas: biological resources, hydrology and water quality, land use, transportation and traffic, and utilities. For instance, impacts to biological resources would be reduced due to avoidance of realigning the North-South Creek Segment of Tank Farm Creek, and restoring the East-West Channel, thus offering more protection for the existing sensitive species and habitat in the associated area. Noise, air quality and GHG emissions impacts would remain significant and unavoidable related to short-term construction activities, similar to the Project. While impacts to transportation and traffic would also likely remain significant and unavoidable for the Buckley Road/SR 227 intersection, offsite transportation improvements would reduce impacts compared to the Project and other alternatives. Required traffic mitigations and improvements would be similar to other General Plan-based development upon the Project site, as discussed under No Project Alternative B.

The Mitigated Project Alternative would also achieve all of the Project objectives. This alternative is largely consistent with the updated LUCE and AASP with inclusion of a Neighborhood Park and a Neighborhood Commercial area. A variety of housing opportunities would be available, including an increased amount of potentially lower

priced, higher density R-3 and R-4 housing opportunities. The open space network would include a variety of recreational activities and accessibility via automobile, bicycle, and pedestrian amenities. Unlike the Project, Tank Farm Creek along the North-South Creek Segment and along the East-West Channel would be preserved, as would flexible future accommodation for potential future Tank Farm alterations within the Project site's northeast region under this alternative. The alternative would be similar to the Project in its adherence to sustainable development practices and design features. Therefore, this alternative is considered to be the environmentally superior alternative over other alternatives, as shown in Table 5-25.

Table 5-25. Impact Comparison of Alternatives to the Proposed Project

Issue Area	No Project		Mitigated Project	Business Park
	A. No Development	**B. General Plan Development**		
Aesthetics and Visual Resources	Less	Similar	Similar	Greater
Agricultural Resources	Less	Similar	Similar	Similar
Air Quality	Less	Similar	Similar	Greater
Biological Resources	Less	Similar	Less	Less
Cultural Resources	Less	Similar	Similar	Greater
Hazardous Materials	Less	Similar	Similar	Greater
Hydrology and Water Quality	Less	Less	Less	Less
Land Use and Planning	Less	Less	Less	Greater
Noise	Less	Similar	Similar	Greater
Population and Housing	Greater	Similar	Similar	Similar
Public Services	Less	Similar	Similar	Similar
Transportation and Traffic	Less	Similar	Less	Greater
Utilities	Less	Similar	Less	Greater
Project Objectives Met?	No	Partially	Yes	Yes

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