

5.0 OTHER CEQA-REQUIRED DISCUSSIONS

This section discusses other issues for which CEQA requires analysis in addition to the specific issue areas discussed in Section 4.0, *Environmental Impact Analysis*. These additional issues include: (1) the potential to induce growth; (2) significant unavoidable effects of the project; and (3) significant and irreversible impacts on the environment.

5.1 GROWTH INDUCING EFFECTS

Section 15126.2(d) of the *State CEQA Guidelines* requires that EIRs discuss the potential for projects to induce population or economic growth, either directly or indirectly. CEQA also requires a discussion of ways in which a project may remove obstacles to growth. Generally speaking, a project may be considered growth inducing if it results in one or more of the five conditions identified below:

1. *Induces population growth;*
2. *Induces economic expansion;*
3. *Establishes a precedent setting action (e.g. an innovation, a radical change in zoning or general plan designation);*
4. *Results in development or encroachment in an isolated or adjacent area of open space (i.e. being distinct from "infill" development); or*
5. *Removes an impediment to growth (e.g. the establishment of an essential public service or the provision of new access to an area).*

The impacts identified below are based on buildout of the project which includes a Specific Plan, General Plan Amendment/Pre-Zoning, Tentative Tract Map, and development plan for the 131-acre project site, including annexation of the site into the City of San Luis Obispo. The project is intended to be consistent with the development parameters described in the City's Land Use and Circulation Element (adopted in December 2014). The project includes a mixture of residential, commercial, office, and hotel uses, with a portion of the site preserved for agriculture and open space uses. The project is planned to be constructed in six phases, beginning in 2017 and ending in 2023.

5.1.1 Population Growth

As discussed in Section 2.0, *Project Description*, the proposed project would result in up to 580 low-medium, medium, and high density residences that would range from detached single-family units to attached multi-family dwellings. Development of the project would add an estimated 1,293 residents to the City (546 new single family and multi-family dwelling units x 2.29 people/unit and 34 new affordable units x 1.25 people/unit).¹ When added to the City's existing population of 45,802, the City's total population with the project would be 47,095 persons. The City's General Plan allows the property to be developed with up to 500 dwelling units, 200,000 square feet of commercial, 150,000 square feet of office, and a 200-room hotel and conference center. In addition, as described in Section 2.0, *Project Description*, the project

¹ Population growth rate from City's Land Use and Circulation Element Appendix I Water Supply Assessment (page 9), as referred to in SB610 Water Supply Assessment – San Luis Ranch prepared by Cannon (2016; Appendix M).



includes an affordable housing component in accordance with City requirements. The San Luis Ranch Specific Plan proposes 34 deed-restricted affordable units on site for very low, low, and moderate income households, including 26 very low income units. Consistent with Section 17.90.040(d) of the City's Affordable Housing Incentives, the proposed affordable housing would allow for an 80-unit density bonus, bringing the total allowable residential units in the Specific Plan Area from 500 to 580. Therefore, population growth under the project is consistent with the City's General Plan. The potential environmental impacts associated with this population growth are analyzed throughout Sections 4.1 through 4.14 of this EIR.

5.1.2 Economic Growth

The proposed project includes residential development and commercial development. Commercial uses proposed for the project may include retail anchors, neighborhood retail, restaurants, offices, and a hotel. As such, the proposed project would contribute to economic growth by providing additional space for business within the City. Additionally, residential development may indirectly contribute to economic growth. As development occurs under the proposed project, the additional population would likely contribute to the local economy as demand for general goods increases, which in turn could result in economic growth for various sectors.

5.1.3 Precedent Setting Action

The San Luis Ranch property is identified in the City's updated Land Use Element as Specific Plan Area (SP-2). The Specific Plan area is currently part of the unincorporated area of San Luis Obispo County, but is within the City's Sphere of Influence. Policy 8.1.1 of the Land Use Element requires the completion and approval of a specific plan and associated General Plan amendment prior to annexation and development of land within the area designated SP-2. The parameters for future development within the area designated SP-2 are included in Policy 8.1.4. The San Luis Ranch Specific Plan must meet performance standards prescribed in the Land Use Element, including minimum and maximum density requirements. Annexation would be subject to approval by the San Luis Obispo Local Agency Formation Commission (LAFCo) in coordination with both the City and County of San Luis Obispo.

The project, as proposed, would require discretionary approvals from the City including the San Luis Ranch Specific Plan, General Plan Amendment/Pre-Zoning, Tentative Tract Map, and development plan for the 131-acre site, including annexation of the site into the City of San Luis Obispo, and Architectural Review. Since the project would be required to be consistent with the development parameters and what is envisioned for the site in the City's General Plan, it would not be considered precedent setting. Nevertheless, the project would be at the discretion of the City Council who may consider it on its own merits in terms of how the new proposal fulfills the City General Plan goals and objectives. Any growth inducement from these actions would occur within what is planned for the site in the City's General Plan.

5.1.4 Development of Open Space/Vacant Land

Development of open space is considered growth-inducing when it occurs outside urban boundaries or in isolated locations instead of infill areas. The City's General Plan has identified



several specific plan areas within its boundaries that are designated for development. The San Luis Ranch Specific Plan area is designated as such and development of the site would occur in an area of the City surrounded by existing development. The Specific Plan would not involve development on existing dedicated open space or parks. As described in Section 2.0, *Project Description*, the project would also preserve approximately 53 acres of project site in agriculture and approximately 8 acres of the project site in open space.

5.1.5 Removal of an Impediment to Growth

The project would not result in the removal of an impediment for growth, as adequate access and services are already available for the adjacent and surrounding areas, which are all within the City of San Luis Obispo. Rather, the project would facilitate a planned mixture of uses on one of the last remaining large sites and Specific Plan areas identified within the City of San Luis Obispo's General Plan Land Use Element. As such, it would reduce the potential for uncontrolled piecemeal growth in the region and it would reduce the pressure for urban sprawl beyond the existing urban limits. The project site is contiguous to urban land uses designated for urban development, and the site is entirely surrounded by land within the limits of the City. In addition, by focusing development within already urban-designated areas, it is anticipated that implementation of the project would reduce growth pressure in undeveloped areas at the periphery of the City. This would be expected to reduce the potential for impacts relating to such issues as biological resources, regional traffic, and air quality as compared to development on lands beyond urban boundaries. No additional utility infrastructure or facilities beyond those necessary to accommodate the project would be required. Overall, the proposed project would not result in the removal of an impediment to growth.

5.2 SIGNIFICANT UNAVOIDABLE EFFECTS

State CEQA Guidelines §15126(b) requires that an EIR identify those significant impacts that cannot be reduced to a less than significant level with the application of mitigation measures. The implications and reasons why the project is being proposed, notwithstanding, must be described.

As discussed in Sections 4.3, 4.5, 4.9, 4.10, and 4.12, implementation of the project would result in the following significant and unavoidable impacts:

- *Air Quality – 2001 Clean Air Plan consistency*
- *Cultural Resources – Relocation and removal of historic structures*
- *Land Use/Policy Consistency – Inconsistency with City General Plan policies related to historic resource protection and multimodal level of service*
- *Noise – Temporary construction noise*
- *Transportation and Circulation – Near-Term Plus Project and Cumulative Plus Project traffic conditions*



5.3 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL EFFECTS

State CEQA Guidelines §15126.2(c) requires a discussion of any significant irreversible environmental changes which would be caused by the proposed project should it be implemented. Such significant irreversible environmental changes may include the following:

- *Use of non-renewable resources during the initial and continued phases of the project which would be irreversible because a large commitment of such resources makes removal or non-use unlikely;*
- *Primary impacts and, particularly secondary impacts (such as highway improvement which provides access to a previously inaccessible area) which generally commit future generations to similar uses; or*
- *Irreversible damage which may result from environmental accidents associated with the project.*

Project development would result in the permanent conversion of open, agricultural lands to residential and commercial uses. It would also require building materials and energy, some of which are non-renewable resources. Consumption of these resources would occur with any development in the region and are not unique to the proposed project. The addition of new residential units and commercial space would irreversibly increase local demand for non-renewable energy resources such as petroleum and natural gas. Increasingly efficient building fixtures and automobile engines, as well as implementation of policies included in the San Luis Ranch Specific Plan are expected to offset the demand to some degree. It is not anticipated that growth accommodated under the proposed project would significantly affect local or regional energy supplies.

Growth accommodated under the proposed project would require an irreversible commitment of law enforcement, fire protection, water supply, wastewater treatment, and solid waste disposal services. In addition, the vehicle trips associated with the proposed project would incrementally contribute local traffic and noise levels and regional air pollutant emissions. Accordingly, impacts related to air quality, cultural resources, greenhouse gas emissions, land use/policy consistency, noise, and transportation and circulation were determined to be significant and unavoidable, as discussed in Sections 4.3, 4.5, 4.6, 4.9, 4.10, and 4.12 of this EIR.

