

## 5.0 ALTERNATIVES

### 5.1 INTRODUCTION

The California Environmental Quality Act (CEQA) Guidelines state that an “Environmental Impact Report (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 sections. Section 5.2, *Project Objectives*, describes the objectives of the Froom Ranch Specific Plan (FRSP) (Project). Section 5.3, *Summary of Significant and Unavoidable Impacts*, summarizes the potentially *significant and unavoidable* short- and long-term impacts of the Project from information presented in Chapter 3, *Environmental Analysis and Mitigation Measures*. Section 5.4, *Alternatives Analysis*, discusses potential impacts under the Project alternatives, including a discussion of the alternatives considered but discarded. Section 5.5, *Identification of Environmentally Superior Alternative*, 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

Section 15124(b) of the State CEQA Guidelines requires a statement of a project's objectives that includes the underlying purpose of the project. The major objectives of the Project are described in Section 2.3, *Project Objectives*, and restated below.

1. Development of a mix of uses while protecting sensitive environmental resources and maintaining public views of the Irish Hills.
2. Provision of a range of housing options, including workforce housing, senior housing, and inclusionary housing.
3. Development of an economically feasible, healthy, safe, and secure Life Plan Community that will serve residents 60 years of age and over.
4. Development of multi-family housing, including housing consistent with the adopted City of San Luis Obispo (City) Inclusionary Housing Requirements in effect at the time of the Specific Plan adoption.
5. Provision of commercial retail uses that complement residential uses and facilitate pedestrian and bicycle access.
6. Provide site hydrology design to improve stormwater conveyance and management, provide a restored riparian creek corridor, and enhance fishery habitat and biological resource value.
7. Development of a public park that includes access and connection to existing trails in the Irish Hills Natural Reserve and proposed trails within the Specific Plan area.
8. Reconstruction, rehabilitation, and adaptive reuse of architecturally significant historic structures within a public park, in a setting and configuration that retains historic integrity, while avoiding seismic impacts.
9. Establishment of a cohesive transportation and circulation network of collector and residential roads, bicycle lanes, transit opportunities, and pedestrian sidewalks that is integrated with and enhances the regional transportation system.
10. Incorporation of sustainability measures that exceed the requirements of the California Building Standards Code (Title 24) and California Energy Code (Part 6) in effect at the time of construction, as well as provide onsite renewable energy facilities and Electric Vehicle (EV) charging infrastructure in all land use types.
11. Avoidance of impacts to sensitive plant and wildlife species, such as the state and federally-endangered Chorro Creek bog thistle (*Cirsium fontinale var. obispoense*).

### **5.3 SUMMARY OF SIGNIFICANT AND UNAVOIDABLE IMPACTS**

The Project would result in significant and unavoidable impacts to the following resources areas: aesthetics and visual resources; air quality and greenhouse gas emissions; biological resources; cultural and tribal cultural resources; hazards, hazardous materials, and wildfires; land use and planning, noise; and transportation and traffic, as summarized below.

#### **5.3.1 Aesthetics and Visual Resources**

Project development would result in significant impacts to the existing visual character of the site by changing an open space and rural setting to a commercial and residential setting, particularly as viewed from the Irish Hills Natural Reserve public trail system. As demonstrated in key viewing areas (KVAs) 4 and 5 in Section 3.1, *Aesthetics and Visual Resources*, the Project would develop up to 581 single and multi-family residences, senior assisted living facilities, commercial uses, a trailhead park, roads, bicycle paths, and other urban infrastructure that would eliminate existing high-quality scenic views. These new uses would be highly visible from numerous public trails along the southeastern edge of the Irish Hills Natural Reserve. Additionally, the Upper Terrace of Villaggio and portions of the Madonna Froom Ranch area would be developed above the 150-foot elevation line, an area that the City's General Plan currently states should be secured as permanent open space with no building sites above the 150-foot elevation in conjunction with any subdivision or development of the lower areas. These portions of the Project would be the only development above this line in the vicinity besides Mountainbrook Church, located in the unincorporated County of San Luis Obispo (County). Implementation of required mitigation measure MM VIS-1 would interrupt the contiguous massing of proposed multi-family and commercial structures by requiring onsite native tree screening plantings, although this would not sufficiently reduce the substantial damage to scenic resources resulting from loss of open space and natural visual setting. Therefore, impacts to aesthetics and visual resources under the Project would be considered significant and unavoidable.

#### **5.3.2 Air Quality and Greenhouse Gas Emissions**

During operation, air emission impacts from reactive organic gases (ROG) and nitrogen oxide (NO<sub>x</sub>) as a result of vehicle trips, energy emissions, and additional area source emissions associated with the Project would be significant and unavoidable. In accordance with the San Luis Obispo County Air Pollution Control District's (SLO County APCD's) CEQA Air Quality Handbook (as amended by the 2017 Clarification Memorandum), all

standard mitigation measures and feasible discretionary mitigation measures would be incorporated into the Project (see MM AQ-4). Many of these measures would be incorporated as policies of the FRSP for which future development would be required to implement and would manifest as site design measures which would reduce area source emissions. Many other measures identified in MM AQ-4 emphasize transportation strategies to reduce vehicle miles traveled (VMT) and associated mobile-source NO<sub>x</sub> emissions. Incorporation of this mix of measures is considered feasible for the Project and would substantially reduce operational ROG and NO<sub>x</sub> emissions. However, many measures listed in MM AQ-4 do not contain quantifiable air quality emissions reductions for programs under the FRSP. While implementation of these measures can feasibly reduce ROG and NO<sub>x</sub>, the Project's estimated emissions after implementation of these measures cannot reasonably be quantified, and long-term operational 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 SLO County 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 attain 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-4 and MM TRANS-5 and -8 through -10.

### **5.3.3 Biological Resources**

Implementation of the Project would result in significant and unavoidable impacts to biological resources. Construction and operation of the Project would impact sensitive habitats and species, including sensitive riparian, wetland, and native grassland habitats, migratory wildlife corridors, and sensitive and endangered species. The Project would substantially impact 14 special status plant species, including the state and federally endangered Chorro Creek bog thistle, and serpentine native bunchgrass and associated habitat. Development within the Upper Terrace of Villaggio would have substantial adverse effects on native grasslands and existing springs, seeps, and wetland habitats along Drainages 1, 2, and 3, and associated wildlife corridors. The wetland adjacent to Calle

Joaquin, a federal jurisdiction wetland, could be significantly impacted through modifications to site hydrology with the realignment of Froom Creek. Additionally, development located between the realigned Froom Creek and upland grassland habitats and drainages would have significant impacts on habitat connectivity and animal movement corridors along the urban-rural interface of the City's boundary. While mitigation measures proposed in Section 3.4, *Biological Resources*, would minimize or reduce adverse effects, impacts would continue to be substantial and are, therefore, considered significant and unavoidable.

#### **5.3.4 Cultural and Tribal Cultural Resources**

The Project would result in significant impacts to onsite historic resources, including a City-, state-, and federally-eligible historic district associated with the historic Froom Ranch Dairy complex. The Project would result in a loss of three out of seven buildings that contribute to the eligibility of the Froom Ranch Dairy complex for listing on the National Register, California Register of Historic Resources (CRHR), and City Master List of Historic Resources as a historic district. Though MM CR-9 through MM CR-14 would reduce the severity of this loss, impacts to the potential Froom Ranch Dairy historic district are considered significant and unavoidable.

#### **5.3.5 Hazards, Hazardous Materials, and Wildfires**

The Project would expose occupants to substantial wildfire hazards and would impair emergency response to fires in the Irish Hills Natural Reserve. The Project site is located in an area with moderate to very high fire hazard potential due to highly flammable vegetation and fire-prone topography within the adjacent Irish Hills Natural Reserve, as well as winds that periodically blow southeast downslope toward the Project site. Additionally, the Project would utilize security fencing, retaining walls, and closely spaced residential units in the western portion of Villaggio's Lower Area that would limit access for firefighters and vehicles to the wildfire interface. Although the Project would be required to implement mitigation measures to reduce wildfire risks, occupants would still be exposed to wildfire hazards and emergency response to a wildfire in the Irish Hills would continue to be impaired by the Project as currently designed. Therefore, impacts related to wildfire hazards would remain significant and unavoidable.

#### **5.3.6 Land Use and Planning**

The Project would substantially conflict with City General Plan policies for the protection of visual, biological, cultural resources, and wildfire hazards. The Project would develop

residential units above the 150-foot elevation line in Villaggio's Upper Terrace, which would be require a General Plan amendment and would be substantially inconsistent with the General Plan Land Use Element (LUE) and Conservation and Open Space (COSE) policies. These policies protect sensitive biological, open space, and visual resources, including LUE Policies 1.8.6, *Wildlife Habitats*, and 6.4.7, *Hillside Planning Areas*, and COSE Policies 7.3.1, *Protect Listed Species*, 7.3.2, *Protect Species of Local Concern*, and 9.2.1, *Views to and from public places, including scenic roadways*. Additionally, the Project would relocate or demolish structures associated with the historic Froom Ranch Dairy complex, a potential historic district under the City's Historic Preservation Ordinance and the CRHR. While mitigation measures would minimize these impacts, potential adverse physical effects related to the potential inconsistencies with City policies would remain significant and unavoidable.

### 5.3.7 Transportation and Traffic

Project traffic would exacerbate existing queuing and peak hour traffic congestion for automobiles, and poor levels of service for pedestrian, bicycle, and transit modes of transportation, causing transportation deficiencies in the Project vicinity, including Los Osos Valley Road (LOVR) and U.S. Highway 101 (U.S. 101), resulting in significant impacts. Although the Project would implement MM TRANS-2 and MM TRANS 12 through -18, which would require roadway improvements to improve multimodal facilities, increase capacity, and alleviate queuing impacts, feasible mitigation is not available to fully mitigate the Project impacts. Specifically, implementation of MM TRANS-6 requires the completion of the Prado Road Overpass/Interchange project, which cannot be ensured by this Project. Therefore, if Prado Road Overpass/Interchange project is not in place by Project occupancy, impacts would be significant and unavoidable.

## 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 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. Those alternatives carried forward for consideration and analysis include:

- CEQA "No Project" Alternative;

- Alternative 1 – Clustered Development Below the 150-Foot Elevation Alternative (Actionable Alternative)
- Alternative 2 – Residential Development Project Alternative
- Alternative 3 – Minimum LUCE-Compliant Alternative

#### **5.4.1 Alternatives Considered but Discarded**

CEQA Guidelines Section 15126.6(c) requires that an EIR disclose potential alternatives that were considered and discarded and provide a brief explanation as to why such alternatives were not fully considered in the EIR. As required by the State CEQA Guidelines, the selection of alternatives includes a screening process to determine a reasonable range of alternatives that could reduce significant effects but also feasibly meet most of the Project objectives. If an alternative does not clearly provide any environmental advantages compared to the proposed Project, meet key project objectives, or achieve overall agency policy goals, it has been eliminated from further consideration. 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 applicable 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 based on the above considerations.

##### **5.4.1.1 Alternative Land Use Mixes – Increased Commercial Retail/Elimination of Housing**

Under this potential alternative, the site would not be developed with residential uses or the Life Plan Community and would instead be developed with commercial retail uses within the proposed developed portion of the site. Froom Creek would not be realigned, and additional flood control improvements may be required to accommodate increased runoff from additional impermeable surfaces and development. To accommodate increases in personal and commercial vehicle trips to serve the commercial uses, a secondary access road would also be constructed onto LOVR. Under this alternative, 50 percent of the site would remain dedicated open space.

This alternative would be inconsistent with the General Plan LUE performance standards for the Project site and would not achieve a majority of the Project objectives, which include the provision of a variety of housing types and provision of commercial uses that complement residential uses. Further, development of the site solely for commercial 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. Further, this alternative would likely result in increased impacts to traffic, roadway congestion, and associated air quality due to the increased number of trips to and from the site. Therefore, this option was considered and discarded, consistent with CEQA Guidelines Section 15126.6(c).

### 5.4.1.2 Maximum Buildout Consistent with the General Plan, including LOVR Bypass

Under this alternative, substantially less housing and substantially more commercial uses would be developed on the site, consistent with the General Plan LUE and the existing performance standards for the SP-3, Madonna on LOVR Specific Plan area. These performance standards include a maximum of 350 residential units and 350,000 square feet (sf) of commercial space with a minimum of 50 percent of the site designated for open space. This alternative would not develop the site for a senior Life Plan Community as envisioned under the Project. This change in land use could change the mix and type of residential units, with a lower percentage of medium density units compared to commercial uses than the proposed Project. Further, analysis of this alternative would include consideration of planned transportation and traffic improvements (primarily the LOVR Bypass) and the effects those improvements would have on allowable General Plan buildout of the Project site and cumulative regional transportation. The LOVR Bypass would present additional offsite environmental impacts in addition to site development consistent with the General Plan.

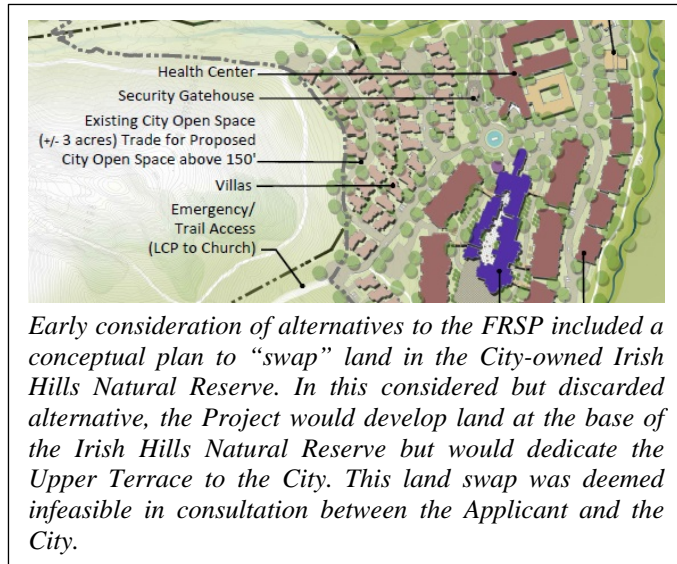
However, this alternative would not meet several of the Project objectives, including development of a Life Plan Community and development of a broader range of housing options, including multi-family units, senior, and inclusionary housing. In addition, the City has conducted a cost-benefit analysis for the LOVR Bypass and found that there were little-to-no benefits to overall traffic circulation associated with the project to justify the costs of the project and potential impacts to agricultural resources and riparian habitat. Therefore, this potential alternative is not reasonable or feasible to mitigate environmental impacts and this alternative has been considered and discarded, consistent with CEQA Guidelines Section 15126.6(c). In addition, this alternative was already considered within



the Land Use and Circulation Element (LUCE) Update EIR under the ‘Maximum Circulation Improvement Alternative,’ which assessed both buildout of the Project site under the General Plan scenario and development of the LOVR Bypass improvements. Further detailed analysis of this alternative need not be reconsidered under this EIR.

#### 5.4.1.3 Land Swap Alternative

Under this alternative, development proposed within Villaggio’s Upper Terrace would be relocated below the 150-foot elevation contour line. The Upper Terrace area would be dedicated open space and an emergency/trail access easement would be constructed from Mountainbrook Church to the Villaggio Life Plan Community development. To accommodate relocation, building density would be increased, along



with structure heights within the Lower Area of Villaggio. In addition, an approximately 10-acre area outside the Project site within the eastern edge of the Irish Hills Natural Reserve and situated below the 150-foot elevation (referred to as the “land swap” area) would be developed with R-3-SP zoned residential senior housing. On the Madonna From Ranch portion of the site, this alternative would result in relocation of historic structures and the proposed trailhead park to the upper northwestern corner of the Project site along From Creek, while the four attached multi-family housing structures would be relocated to the prior proposed trailhead park location. Further, this alternative would include additional circulation improvements, such as an easement onsite for a Class I bike path that parallels LOVR, a multi-modal roadway connection to Calle Joaquin, and a multi-modal roadway connection to the Irish Hills Plaza from Mountainbrook Church. Consistent with the General Plan development standards for the site, 50 percent of the site would remain dedicated for open space.

While this alternative would relocate some development below the 150-foot elevation contour in the Upper Terrace, structures would remain above this elevation and development would intrude into 10 acres of the Irish Hills Natural Reserve in the Lower

Area. Increased density and building heights in the Lower Area of Villaggio to accommodate relocation of proposed Upper Terrace development would result in similar or incrementally greater obstruction of views of the natural hillsides of the Irish Hills. As such, this alternative would continue to result in conflicts with the development standards and policies of the General Plan LUE. While benefits would include increased multi-modal connectivity to the Project site, reduced impacts associated with construction on slopes, and greater avoidance of sensitive serpentine bunchgrass grasslands and the federally-endangered Chorro Creek bog thistle (*Cirsium fontinale* var. *obispoense*), development would not lessen or avoid significant impacts associated with air quality, greenhouse gas (GHG) emissions, and transportation, and would conflict with conservation plans and easements for the Irish Hills Natural Reserve. Further, acquisition of the proposed land swap area would require modifications of a conservation easement held by The Land Conservancy for San Luis Obispo County, an Open Space Easement held by the County of San Luis Obispo, and restriction included in a Grant Agreement with The Nature Conservancy. Acquisition of this land for development would directly conflict with those plans, making acquisition of the land swap area infeasible. As such, this alternative was considered and discarded, consistent with CEQA Guidelines Section 15126.6(c).

### 5.4.1.4 Low Density Upper Terrace Alternative

Under this alternative, development proposed within Villaggio's Upper Terrace would be substantially reduced to include four large-lot estates relocated below the 150-foot elevation contour line. Each estate would include a 10-acre lot with a one-story single-family home within a one-acre building envelope. Areas in the Upper Terrace outside the estates would be dedicated open space. Access to the estates would be provided via a Calle Joaquin and the driveway to Mountainbrook Church, where a new local road would connect the estates then terminate at a cul-de-sac. The roadway would require three culvert crossings of Drainages 1, 2, and 3. An emergency/trail access easement would be constructed from the cul-de-sac to the Lower Area of Villaggio. Within the Lower Area and Madonna Froom Ranch, no changes would be made compared to the Project.

While this alternative would reduce the density of development above the 150-foot elevation contour in the Upper Terrace, structures and private yard space would remain above this elevation. Estate lots would disturb approximately 40 acres in the Upper Terrace, potentially impacting biological and cultural resources similar to the Project. Benefits would include reduced impacts associated with construction on slopes, and greater avoidance of sensitive serpentine bunchgrass grasslands and the federally-endangered

Chorro Creek bog thistle (*Cirsium fontinale* var. *obispoense*). However, the area of disturbance, including indirect impacts from private use of land during operation, would continue to impact these resources. Further, while the reduced density would substantially increase development setbacks from drainages, the estate lots would disrupt wildlife corridors and habitat continuity in the Irish Hills. The reduced building density and heights would reduce visual change in the Upper Terrace, but the development would remain visible from public trails in the Irish Hills Natural Reserve. As such, this alternative would continue to result in conflicts with the development standards and policies of the General Plan LUE. Development would not substantially lessen or avoid significant impacts associated with air quality, biological resources, GHG emissions, and transportation. As such, this alternative was considered and discarded, consistent with CEQA Guidelines Section 15126.6(c).

#### 5.4.1.5 Alternate Site in City of San Luis Obispo

Alternate sites within the City were considered for development of the proposed Project. Such sites would need to be large enough to accommodate the proposed Life Plan Community, multi-family housing, commercial square footage, public park, and requirement for 50 percent preservation of the site as open space (minimum 101.4 acres or greater) and be undeveloped or underdeveloped. Very few sites within the City are large enough to accommodate the proposed Project and those that do are already programmed for development under the General Plan LUE. In fact, many larger sites are currently undergoing concurrent development proposals, including the Avila Ranch Development Plan (SP-4 Avila Ranch) and the San Luis Ranch Specific Plan (SP-2 San Luis Ranch). Other large sites addressed within the General Plan LUE include properties in the County that lie outside the City's urban reserve line (URL) and may not align with City policies and regulations.

Further, alternate locations in the City may also be constrained (e.g., presence of historic resources, hazardous material site, etc.) in ways that would not permit the development of the Project with fewer potential impacts, including aesthetics, hazards, traffic, noise, and air quality. Alternate sites in the City are also not under ownership or management of the Project Applicant, nor do they have an interest from Villaggio as candidates for the Life Plan Community component. Because alternate locations are constrained in ways that would not permit the development of the Project with fewer potential impacts, and the alternate sites are not under the ownership or management of the Project Applicant and are not currently available for development, alternate locations in the City were determined

not to be feasible for development of the Project. Therefore, this alternative was discarded from further consideration, 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, no development or annexation of the site to the City would occur, and the site would remain designated for agricultural and commercial uses by the County. The site would continue to be designated as SP-3 of the City General Plan and remain within the City's Sphere of Influence, and all General Plan LUE requirements for SP-3 for potential future development would remain applicable. No new development or construction would occur under this alternative – for an analysis of development that could be allowed under the current General Plan, see Alternative 3.

Under the No Project Alternative, the site would continue to be used as grazing land and as a staging and operations site for the existing construction company. There would be no disturbance to existing soils or vegetation, except for any ongoing grading permitted by the County, and the site would remain as undeveloped open space. Froom Creek would not be realigned or enhanced and no changes to existing stormwater conveyance and management systems would occur. The existing wetlands and onsite stormwater detention basin would remain. All structures associated with the Froom Ranch Dairy complex would remain in place, would not be rebuilt or restored, and would continue to be utilized for construction business operations (offices, equipment storage, etc.). Daily vehicle trips would remain low/negligible associated with limited employee trips from the existing construction business onsite.

#### Analysis – No Project Alternative

Under the No Project Alternative, a number of significant and unavoidable environmental impacts would be avoided or reduced compared to the proposed Project, although beneficial impacts to population and housing would also not occur. Impacts to aesthetics and visual resources, biological resources, cultural and tribal cultural resources, noise, and impacts to and/or from hazards would be substantially less when compared to the Project, due to the absence of construction activities and operation of the Project. Mitigation measures would not be necessary for these resource areas to avoid significant impacts under this alternative. However, Froom Creek would not be enhanced or restored, and existing historic structures would likely continue to deteriorate.

### *Aesthetics and Visual Resources*

This alternative would result in no impact to aesthetics and visual resources, as there would be no new development of the site which would result in obstruction or degradation of views of the Irish Hills or from the public trails within the Irish Hills Natural Reserve.

### *Agricultural Resources*

This alternative would result in no impact to agricultural resources, as there would be no development that would affect agricultural soils or conflict with existing agricultural zoning. The No Project Alternative would not require reconfiguration of the existing agricultural conservation easement and would not reduce the viability of existing or potential agricultural operations onsite, including within the existing open space.

### *Air Quality and GHG Emissions*

Impacts to air quality and GHG emissions within the Project site and immediate vicinity would be reduced, as there would be no construction emissions under this alternative. Continued dust generation from construction company operations (e.g., staging of construction equipment, storage of fill material, site grading) would contribute to air quality emissions; however, such emissions would be the same as existing conditions and would be substantially less than the construction and operational emissions produced by the Project. Further, as no new development would occur, this alternative would remain consistent with the City and state goals for achieving carbon neutrality, and would be consistent with the land uses and VMT traveled identified in the 2001 Clean Air Plan.

### *Biological Resources*

Impacts to biological resources would be negligible and substantially less than under the proposed Project. Existing wetland and riparian habitat and associated sensitive species within the Project site would be subject to ongoing management practices, including grazing and occasional maintenance and removal of wetland vegetation with the existing stormwater detention basin. Realignment of Froom Creek would not occur and adjacent unpermitted grading would need to be addressed. Froom Creek would also not be enhanced with habitat for steelhead and riparian habitat areas. LOVR widening improvements would not occur and would not impact Calle Joaquin wetlands or the LOVR ditch. Sensitive plants species and habitats within the Upper Terrace would continue to be subject to low to moderate impacts from horse and cattle grazing and would remain unprotected through any

land protection mechanism. Compared to the Project, no mitigation measures would be required to lessen the significance of impacts upon the site's biological resources.

### *Cultural and Tribal Cultural Resources*

Identified historic structures would remain in place under the No Project Alternative; no structures would be rebuilt or restored and the main residence and some of the structures would continue to be utilized for construction business operations (offices, equipment storage, etc.). Permanent direct loss of structures composing a potential historic district would not occur as a result of this alternative, although some historic structures would continue to deteriorate. Impacts to buried or undiscovered cultural and archaeological resources within the Project site would be avoided, although ongoing onsite activities (mining, construction staging, grading) may impact such features.

While the No Project Alternative would not involve the physical alteration of any onsite historic structures affecting their significance or eligibility, these historic resources would not receive the same benefits as under the Project. Eligible historic structures/resources would not be rehabilitated and preserved, nor would they be relocated outside the potential active fault zone to more geologically stable locations. Under the No Project Alternative, these resources would continue to be utilized for storage and construction business operations, with no specialized maintenance or upkeep. As such, these structures may further deteriorate and continue to be at risk of failure or collapse. Over time, the deterioration of the structures may result in a loss of integrity while remaining on site and a loss of the resource value entirely when deterioration results in removal of the structures. Retention of these structures in their current place and status would not result in any changes to the eligibility of the resources or the potential historic district in the short-term, which would less impacts compared to the Project, but in the long-term, the No Project Alternative would inevitably result in negligence of the buildings and eventual loss of eligible structures. Therefore, impacts would ultimately be greater than under the Project.

### *Geology and Soils*

Impacts to and from geologic and soil resources under the No Project Alternative would be much less than under the proposed Project. No soil disturbance beyond existing agricultural operations and ongoing period grading would occur. Implementation of this alternative would not expose structures or persons to or create or exacerbate known or potential geologic and soils hazards.

### *Hazards and Hazardous Materials and Wildfire*

Implementation of the No Project Alternative would not result in any impacts to hazards and hazardous materials. This alternative would not construct new development that exacerbates existing hazards and would not expose persons to existing hazards or hazardous materials. This alternative would also avoid exacerbation of wildfire hazards, by both reducing the potential for ignition and keeping residential land uses out of high fire hazard areas at the urban wildland interface.

### *Hydrology and Water Quality*

Implementation of the No Project Alternative would not result in any impacts to hydrology or water quality. This alternative would not increase impermeable surfaces on the Project site and would not result in the potential to expose surface and groundwater sources to pollutants from construction and equipment. Froom Creek would not be realigned and restored, the habitats within the Calle Joaquin wetlands and LOVR ditch would remain similar to existing conditions, and the existing Irish Hills stormwater detention basin and associated wetlands would remain in operation along with impacts of periodic maintenance activities. However, this alternative would not result in alleviation or improvement of flood conditions at the U.S. 101 box culvert. Compared to the Project, flood conditions under this alternative would be worsened and result in greater impacts.

### *Land Use and Planning*

Impacts to land use under this alternative would be less than those anticipated under the proposed Project. The No Project Alternative would result in continued discrepancies between the existing agricultural uses and the General Plan LUE intent for the area to provide a substantial number of residential units, Neighborhood Commercial or Retail Commercial uses, and preserved open space; however, the existing use would continue to be consistent with the County General Plan. This alternative would result in less than significant impacts related to consistency with General Plan LUE policies as no development would conflict with policies relating to Froom Creek, development above the 150-foot elevation contour, and development on agricultural and biologically sensitive lands. However, the City's housing supply, particularly for senior units, would not be expanded, and conflicts with Housing Element (HE) goals for provision of such housing could potentially occur.

### *Noise*

The No Project Alternative would not result in any impacts related to noise. Under this alternative, no construction or operational noise would be generated. Noise levels at the site would remain similar to the existing setting at the Project site.

### *Population and Housing*

Impacts to population and housing under this alternative would likely be greater than under the proposed Project. Compared to the Project, this alternative would not result in beneficial impacts to the housing supply nor assist in meeting the City's Regional Housing Needs Allocation targets. The No Project Alternative would not meet existing and future housing needs or provide increased affordable housing opportunities. The jobs/housing imbalance within the City, as described in Section 3.11, *Population and Housing*, would continue or be exacerbated. Increased demand for housing within the City to support employment and economic growth would continue. 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 3.11, *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 the No Project Alternative would not provide housing opportunities within the Project site, this alternative would not partially alleviate some of these direct and indirect impacts to population and housing.

### *Public Services and Recreation*

The No Project Alternative would not result in any impacts to public services and recreation. Under this alternative, no additional police officers or fire fighters would be needed and there would not be an increase in population that would require construction of additional educational or recreational facilities.

### *Transportation and Traffic*

Traffic and transportation impacts would be much less than the proposed 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. This alternative would also not contribute to transportation improvements in the vicinity, such as LOVR



improvements (i.e., Class IV bike lanes and sidewalks) or intersection improvements at Auto Park Way.

*Utilities and Energy Conservation*

Impacts to utility and energy supplies and services would be much less compared to the proposed Project. There would be no new significant demand for water, electricity, natural gas, and fuel supplies nor additional demand for or increased strain on utility services and infrastructure. Implementation of the No Project Alternative would not require treatment capacity from the Wastewater Resource Recovery Facility (WRRF) during dry or wet-weather conditions.

*Mineral Resources*

Under this alternative, the onsite red rock quarry would continue as an existing permitted mining site in the County, though the quarry is not planned to be utilized for further production. Impacts to this mineral resource would be less than the proposed Project.

5.4.2.2 Alternative 1 – Clustered Development Below the 150-foot Elevation Alternative (the Actionable Alternative)

Through review of the Draft FRSP, the City acknowledged potential inconsistencies of the Project with hillside protection policies prohibiting development above 150-foot elevation line within the Irish Hills, requiring a General Plan amendment as part of the Project to accommodate the proposed Upper Terrace and Madonna Froom Ranch development that would intrude into the hillsides onsite. In the interest of Project review and decision-making, the City requested the Applicant develop an “Actionable Alternative” involving a land use configuration that would meet the Project objectives but could be approved under the existing City policy framework without substantial amendments. Alternative 1 was directly influenced by the Applicant’s work on the Actionable Alternative, which proposes to relocate development downhill and increased density within the Lower Area. This alternative is analyzed in project-level of detail compared to the Project to facilitate flexibility in City decision-making and action.

Alternative 1 would include a major reconfiguration of the proposed land use plan and redesign of key Project elements specifically to cluster proposed land uses into a smaller development footprint, thereby reducing environmental impacts identified in the EIR. Alternative 1 represents an alternative largely designed by the Project Applicant (see Appendix C for a conceptual design plan that informed this alternative analysis) with three

key changes to respond to the EIR's impact analysis for the Project, as discussed further below. This alternative is analyzed at a high level of detail to allow City adoption of this alternative (if selected).

Alternative 1 would include three primary features that differ from the Project to substantially reduce identified Project impacts:

- 1) Consistent with the 2014 General Plan LUE, all new urban development would occur below the 150-foot elevation line. All residential land uses under Alternative 1 would be relocated to areas within the Project site that are below the 150-foot elevation line and all development within the Upper Terrace would be removed. The only development that would occur above the 150-foot elevation line would be the proposed public park containing the same four Froom Ranch Dairy structures proposed to be retained by the proposed Project. This would restrict development to roughly 30 percent of the site;
- 2) Development would be clustered within the Lower Area of Villaggio and Madonna Froom Ranch. Overall building density in developed areas of the site would increase to accommodate the same capacity for development as the Project but within a smaller area. Maximum heights of some buildings would increase by approximately one story.
  - a. The Lower Area would remain designated R-3-SP, but development of buildings within the Lower Area would be reconfigured and some building heights and sizes would increase by one story, including the Villaggio Commons buildings and the proposed tower.
  - b. Residential areas within Madonna Froom Ranch would be designated R-4-SP and maximum residential density would increase to 24 units per acre from 20 units per acre under the Project;
- 3) Emergency access would be provided via three different connections: 1) from the Irish Hills Plaza into Madonna Froom Ranch; 2) from LOVR to the Lower Area of Villaggio; and 3) from Calle Joaquin to the Lower Area of Villaggio through the proposed stormwater detention basin area.

Required discretionary actions would be similar to the proposed Project:

- General Plan Amendment and Pre-zoning. Similar to the Project, Alternative 1 would exceed a maximum of 350 units as identified in Section 8.1.5 of the General

Plan LUE, which would require a General Plan amendment to LUE SP-3 performance standards to ensure consistency with the Specific Plan. Because the site is currently unincorporated, it would also need to be pre-zoned based on the approved Project before annexation to the City could be approved (see Table 5-1). Since Alternative 1 would only include a public park within the existing permitted quarry area developed above the 150-foot elevation, including retention of rural ranch buildings from the Froom Ranch Dairy complex, and would not involve urban development above the 150-foot elevation line, this alternative would not require a General Plan amendment to address hillside policy inconsistency related to grading, visual resources, biological and cultural resources, and hydrology associated with the Project. Specific amendments to the General Plan include:

- Amend LUE Section 8.1.5 – Performance Standards to allow a Life Plan Community senior housing land use, including health, support, and recreational amenities, and up to 404 senior housing residential units with 51 beds in health care facilities within the Specific Plan area.
- FRSP Adoption. The General Plan LUE identifies Froom Ranch as a Specific Plan area (SP-3, Madonna on LOVR) that requires the adoption of a Specific Plan prior to any development. The proposed Project would require adoption by the City prior to implementation, including Planning Commission and City Council discretionary review proceedings.
- Vesting Tentative Tract Map (VTTM). The Project would require a vesting tentative tract map (VTTM) to implement the provisions of the adopted Specific Plan. The VTTM establishes the proposed lot lines to allow individual ownership of properties and to layout the required infrastructure, water supply assessment, and utilities.
- Architectural Review and Planning Commission Approval. Final architectural review of housing, commercial buildings, and some site facilities by the City’s Architectural Review Commission would be required, with a recommendation provided to the final action hearing body.
- Annexation. If the Project is approved, the City would initiate the annexation process with the San Luis Obispo County Local Agency Formation Commission (LAFCO). Annexation would depend on the City’s ability to address any key issues raised by LAFCO, such as the ability to provide public services to the site (e.g., water, wastewater treatment, solid waste collection and disposal, and fire and police services) and the nature of a tax-sharing arrangement with the County.

Responsible and trustee agency permit requirements would remain similar to the Project and regulatory permits would be required from the California Department of Transportation (Caltrans), U.S. Army Corps of Engineers (USACE), California Department of Fish and Wildlife (CDFW), U.S. Fish and Wildlife Service (USFWS), National Oceanic and Atmospheric Administration Fisheries (NOAA Fisheries), Federal Emergency Management Agency (FEMA), and SLO County APCD (refer to Section 2.5, *Required Approvals*).

Land Use Plan and Site Design

The land use plan under Alternative 1 would substantially reduce the area of disturbance and development compared to the Project, including limiting residential and commercial land uses to areas of the site below the 150-foot elevation line (see Figure 5-1). Overall developed area would decrease by 8.2 acres as compared to the Project, and more than 6.1 additional acres within the Upper Terrace area would remain as open space, substantially reducing direct and indirect disturbance of habitats and natural resources in this area. Similar to the Project, Alternative 1 would allow for the development of up to 174 multi-family units, 404 independent and assisted senior villas and townhomes, and 51 beds in residential health care facilities. These residential uses would be located within medium-high and high-density residential zones, with 100,000 sf of commercial uses within retail-commercial zones (Table 5-1).

**Table 5-1. Summary of Alternative 1 Zoning and Land Uses**

Proposed Zones	Acreage	Housing Units/ sf
<b>VILLAGGIO</b>		
<b>R-3-SP Medium-High Density Residential</b>	<b>23.5</b>	<b>404 units/ 51 beds</b>
<i>Independent Living Units</i>		<i>366 units</i>
<i>Assisted Living Units</i>		<i>38 units</i>
<i>Health Care Units (Skilled Nursing &amp; Memory Care)</i>		<i>51 beds</i>
<i>Health Care Administration Building</i>		<i>85,670 sf</i>
<i>Ancillary Uses (wellness center, restaurants, theater, etc.)</i>		<i>76,509 sf</i>
<b>MADONNA FROM RANCH</b>		
<b>R-4-SP High Density Residential</b>	<b>7.4</b>	<b>174 multi-family units</b>
<b>C-R-SP Retail-Commercial</b>	<b>3.1</b>	<b>100,000 sf</b>
<i>Hotel with Restaurant</i>		<i>70,000 sf</i>
<i>Other Commercial</i>		<i>30,000 sf</i>
<b>PF-SP Public Facilities</b>	<b>3.3</b>	<b>--</b>
<b>ADDITIONAL USES</b>		
<b>C/OS-SP Conservation/ Open Space</b>	<b>66.8</b>	<b>--</b>
<i>Designated Open Space</i>	<i>59.7</i>	<i>--</i>
<i>Reconfigured Agricultural Easement</i>	<i>7.1</i>	<i>--</i>
<b>Roadways</b>	<b>5.6</b>	<b>--</b>
<b>TOTAL</b>	<b>109.7</b>	<b>578 units/51 beds<sup>1</sup> 100,000 sf commercial</b>

<sup>1</sup> Total exceeds Maximum 350 units as allowed in Section 8.1.5 of the General Plan LUE due to transition of allowed commercial land uses to residential land uses. This total assumes all units planned within residential land uses.

Similar to the Project, Alternative 1 would include adoption of specific zoning standards to govern development within the Specific Plan area. Modified development standards for residential uses from the City’s Municipal Code would apply to the Specific Plan area (Table 5-2).

**Table 5-2. Proposed Development Standards for Residential Zones**

Standard	R-3-SP	R-4-SP
Maximum Density (units/acre)	20 du/ac	24 du/ac
Maximum Building Coverage	60%	60%
Maximum Building Height <sup>1,2,3</sup>	55 feet for Villaggio only	35 feet
Minimum Street Yard Setback <sup>4</sup>	15 feet	15 feet
Minimum Other Yard Setback <sup>4</sup>	0-5 feet	0-5 feet
Minimum Lot Size <sup>5</sup>	1,000 sf	1,000 sf
Minimum Lot Width <sup>5</sup>	20 feet	20 feet
Minimum Lot Depth <sup>5</sup>	50 feet	50 feet

<sup>1</sup> Building heights are measured from finished grades established at the time of completion of subdivision grading.

<sup>3</sup> Components of solar energy systems, towers, and mechanical equipment screening may extend up to 10 feet above the maximum building height.

<sup>4</sup> Yard setbacks do not apply to development in Villaggio as all development is located along private streets.

<sup>5</sup> Lot area and dimensions standards do not apply to Villaggio as individual lots for housing units are not proposed.

*Villaggio Development*

Alternative 1 would continue to provide a Life Plan Community in Villaggio, designated within 23.4 acres of R-3-SP located entirely within the lower portion of the site. Alternative 1 development standards would only differ from the Project related to maximum building heights, where maximum building height within Villaggio would increase from 45 feet to 55 feet to accommodate higher density development within the Lower Area. This would result in changes to building configurations in proposed structures surrounding the Commons where additional Piazza Apartments and Community Village Suite Apartments would be provided (see Appendix C). Clustered development and taller buildings in the central Community Village area of Villaggio, including the proposed apartment buildings in the Commons, would accommodate more units compared to the Project in this area. Similar to the Project, Villaggio would provide planned residential use with independent living units and specialized residential facilities for assisted living, skilled nursing, and memory care (Table 5-3).

**Table 5-3. Types of Senior Housing within Villaggio**

Type of Senior Housing	Units	Size (sf)
<b>Independent Living Units</b>	366 units	700-2,000 sf
<i>Piazza Apartments</i>	<i>180 units</i>	700-1,900 sf
<i>Village Suites</i>	<i>85 units</i>	700-1,900 sf
<i>Garden Terraces</i>	<i>60 units</i>	1,300-1,800 sf
<i>Villas</i>	<i>41 units</i>	1,700-2,000 sf
<b>Assisted Living Units<sup>1</sup></b>	38 units	310-620 sf

<sup>1</sup> Assisted Living Units are assumed to be single occupancy.

Independent living units would vary in size, as follows:

- Piazza Apartments and Village Suites – 265 total units within the upper floors of three- to four-story multi-use buildings up to 55 feet in height;
- Garden Terraces – two- to three-story apartment buildings, containing a total of 60 two-bedroom units; and
- Villas – 41 detached one-story single-family homes with two bedrooms, up to 20 feet in height.

Similar to the Project, residential land uses would extend to the southwest portion of the Project site and would be proximate (i.e., within 50 feet) to the confluence of Drainages, 1, 2 and 3 with Froom Creek, but would not extend to the Upper Terrace. Alternative 1 would replace two Garden Terrace apartment buildings along the western bank of Froom Creek with Piazza Apartment development and would include additional Villas accessed via cul-de-sac at the base of Drainages 1, 2, and 3 to accommodate more units within the designated residential area.

Like the Project, Alternative 1 proposes non-residential development to serve future Villaggio residents, including health care facilities, ancillary restaurant and recreational uses, and other private amenities. These uses are proposed to serve onsite residents, guests, and staff only, and would not be open to the public or residents of Madonna Froom Ranch. Non-residential development within Villaggio would include:

- Health Care Administration Building – A three-story 85,670-sf building within the lower terrace near the Villaggio entrance gate. This building includes the assisted living units, memory care, and skilled nursing beds where residents require 24-hour care and supervision.
- Wellness Center – A 17,720-sf wellness center located within the lower terrace would provide recreational facilities, including an outdoor swimming pool, restrooms, lockers, yoga area, exercise equipment, and physical therapy services.

- The Commons – A four-story mixed-use building, known as “The Commons”, would serve as the community center and include ground floor resident-serving uses, such as restaurants, craft areas, workshops, recreation rooms, and a movie theater.
- Assembly Room – A 5,688-sf room would accommodate a variety of functions and gatherings.
- Tower – A 60-foot-tall tower is proposed that would include a library on the first floor, a total of four guestrooms on the second and third floors, and an observation deck on the fourth floor.
- Security Gatehouse – An approximately 250-sf security gatehouse structure would be located at the main entrance to Villaggio to control access and entry of residents, and provide directions, parking passes, etc. for visitors, employees, and deliveries.

#### *Madonna Froom Ranch Development*

Madonna Froom Ranch would continue to provide multi-family housing and retail commercial uses similar to the Project within 7.4 acres of High Density Residential (R-4-SP) and 3.1 acres of Retail Commercial/General Commercial (C-R-SP) designated areas. All proposed development standards for R-4-SP would remain the same as the Project; however, the proposed density of the residential areas would increase slightly from a maximum of 20 units per acre under the Project to 24 units per acre under Alternative 1. This change would accommodate the same number of residential units as the Project within a smaller development footprint and cluster the residential development within areas below the 150-foot elevation line. As a result of the reconfigured residential land uses, a portion of the multi-family homes would be relocated eastward to lower elevations within Madonna Froom Ranch, away from the habitats and wildfire hazards of the Irish Hills.

Under Alternative 1, the trailhead park would be provided within 3.3 acres of Public Facilities (PF-SP) designated area and would be relocated above the 150-foot elevation line in the northwest corner of the Project site adjacent to the Irish Hills Natural Reserve. This would increase the size of the public park by approximately 0.4 acre. Alternative 1 would include the same commercial uses as the Project located in the northeast portion of the Specific Plan area, including a three-story, 70,000-sf hotel up to 45 feet in height with ground floor retail and restaurant uses and 30,000 sf of retail and office uses within a one-story building up to 24 feet in height.

The reconfigurations included in Alternative 1 would ensure the land use plan better aligns with the policies of the City’s General Plan regarding development above the 150-foot elevation contour and natural resource protection. The land use plan for Alternative 1 would reserve 66 percent of the Specific Plan area (66.9 acres) in Conservation/Open Space

(C/OS-SP), which would be consistent with the City General Plan performance standard of providing a minimum of 50 percent of the Specific Plan area as Open Space/Agriculture (LUE Section 8.1.5. SP-3, Madonna on LOVR Specific Plan area). Alternative 1 would also comply with the General Plan LUE 150-foot elevation development limit line within the Irish Hills Hillside Planning Area, specifically, Subsection 6.4.7.H of the LUE (see also, Section 3.9, *Land Use and Planning*).

Alternative 1 would be similar to the Project in many ways but would represent a substantially more clustered approach to site design, with development restricted to approximately 30 percent of the site (34 acres) in the lower portions of the site. Alternative 1 would reduce overall residential acreage by 8.2 acres while increasing open space by 7.9 acres and public park acreage by 0.4 acres. Increased clustering under Alternative 1 would require substantial changes in the Villaggio design when compared to the Project, including changes to building locations and footprints, increases in maximum residential building heights by one floor (i.e., 10 feet), and an increase in the proposed tower height by five feet (refer to Table 5-4). Most significantly, all development would be removed from the Upper Terrace and nearly 50 acres of land in this area would be retained as contiguous, permanent open space within Villaggio adjacent to the Irish Hills Natural Reserve. These changes would substantially increase contiguous open space and result in improved ecologic and hydrologic connectivity within the Project site compared to the Project.

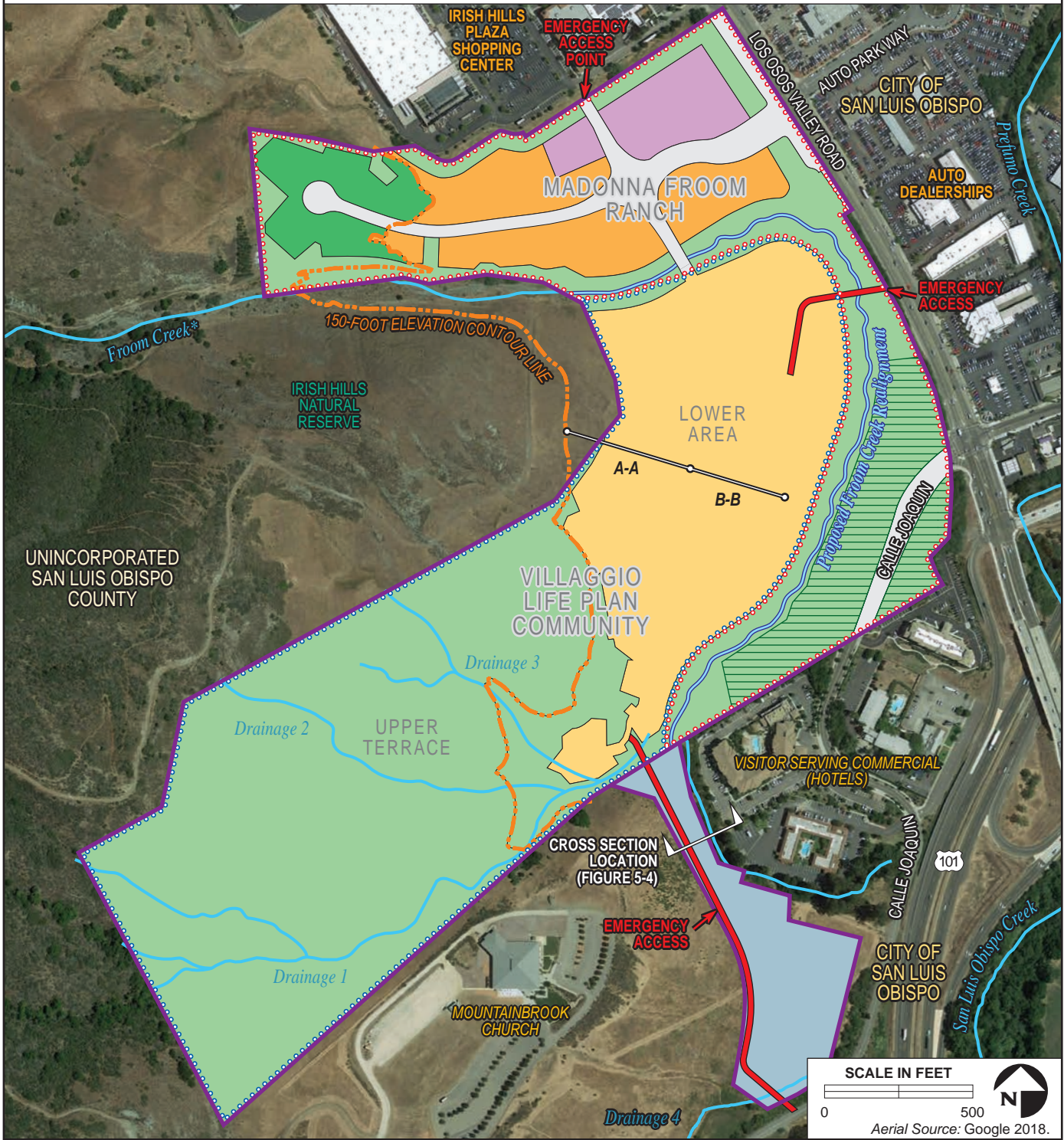
### *Site Design Features*

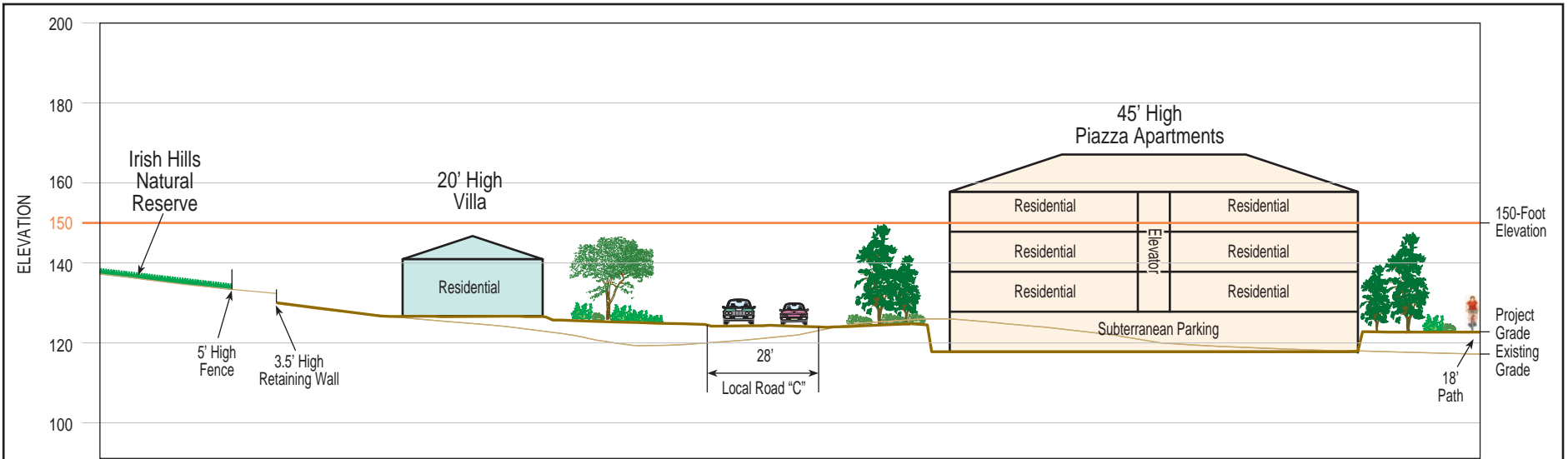
Froom Creek would be realigned and restored similar to the Project and stormwater management would be provided similar to the Project; see Section 2.5.4, *Stormwater Management System and Froom Creek Realignment*. Froom Creek would be realigned to along the eastern edge of development and a public trail along the realigned Froom Creek would be developed, similar to the Project. Additionally, the LOVR ditch would be reconstructed and revegetated similar to the Project and would experience the same reconfiguration to accommodate widening of LOVR. However, due to the reduction in developed area, fewer onsite retention and treatment features would be required, including one stormwater treatment area, one linear water quality treatment area, and four headwall and pipe culverts that would no longer be required in the Upper Terrace.



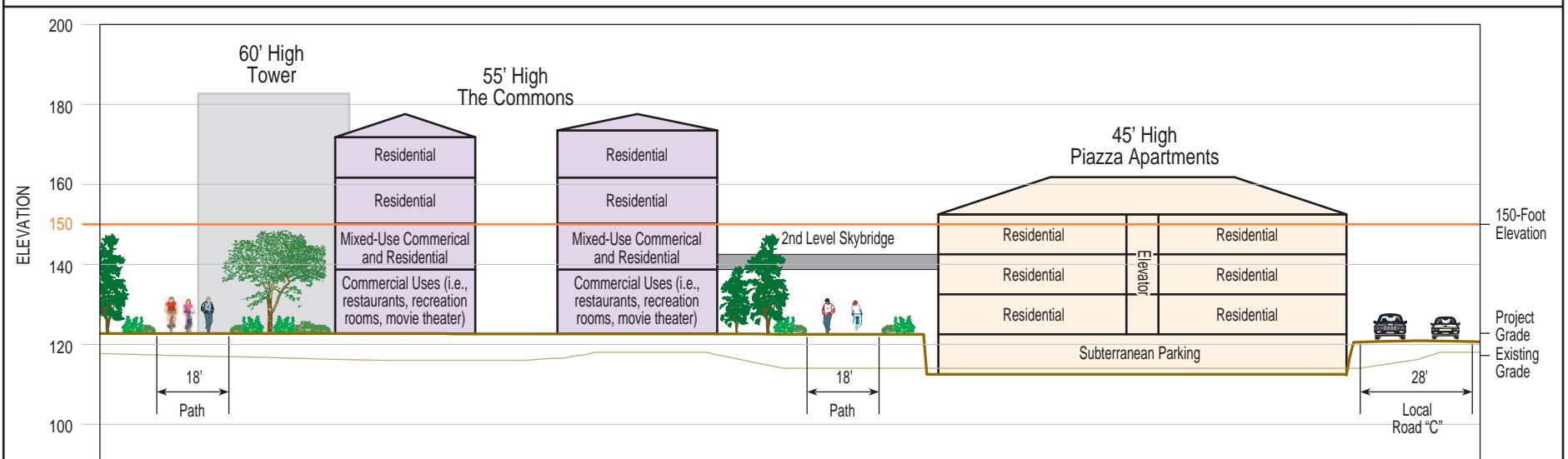
**LEGEND**

Project Site	Public Site Access Roadways: 5.6 acres	C-R-SP – Retail Commercial/ General Commercial: 3.1 acres	R-3-SP – Medium-High Density Residential: 23.4 acres
Cross Section Location (refer to Figure 5-2)	Easement for Relocated Stormwater Basin: 7.1 acres	C/OS-SP – Conservation/ Open Space: 66.9 acres	R-4-SP – High Density Residential: 7.4 acres
<b>Proposed Specific Plan Land Use</b>	Reconfigured Open Space and Agricultural Conservation Easement	PF-SP – Public Facilities: 3.3 acres	<i>*Notes: Roadways within Villaggio are private and are included as part of the medium high density residential land use. Froom Creek would be realigned.</i>
Villaggio (Private)			
Madonna Froom Ranch			





**Cross Section A-A – Irish Hills Natural Reserve to Villaggio Center**



**Cross Section B-B – Villaggio Center**



**Alternative 1 –  
Villaggio Life Plan Community Conceptual Cross Sections  
(refer to Figure 5-1 for cross section locations)**

**FIGURE  
5-2**

As with the proposed Project, at least two major retaining walls would be required under Alternative 1. An approximately 300-foot-long retaining wall would be constructed along the border of the Irish Hills Natural Reserve and northwestern area of Villaggio adjacent to proposed Villa units (refer to Cross Section A-A on Figure 2-6 within Chapter 2, *Project Description*). Another 75-foot-long retaining wall would be located near the historic dairy barn in Madonna Froom Ranch to support the eastern corner of the building if it is retained in its current location in the final design of the public park. These walls would vary from 3 feet to 8 feet in height but would be limited to a maximum exposed above ground height of 8 feet.

Similar to the proposed Project, Alternative 1 would include five-foot-tall security fencing to enclose Villaggio and adjacent to the residential areas within Madonna Froom Ranch. Villaggio would be a gated community with keyed access points for residents to access the Irish Hills Natural Reserve public trail system and the proposed public trail along the realigned Froom Creek. In addition to Villaggio security fencing, five-foot-tall wildlife-compatible agricultural fencing would surround the Specific Plan area and would be designed to allow for animal passage to open space areas, water sources, and wildlife corridors within the site.

In summary, Alternative 1 would differ from the Project in several ways, including a reconfigured residential land use plan, but would retain the basic features of the Project to provide a senior living community and multi-family neighborhood, as detailed in Table 5-4.

#### Circulation and Site Access

Circulation within Alternative 1 would involve public roadways within Madonna Froom Ranch and private roadways in Villaggio similar to the Project; however, the road system would be substantially reduced in length compared to the Project due the clustered development of Alternative 1. Similar to the Project, Alternative 1 would have a primary entrance from LOVR at Auto Park Way. Private access roads within Villaggio would only serve Villaggio and no roads would extend to the Upper Terrace above the 150-foot elevation line. Public roadways would lead to the public park at the northwestern corner of the site (above the 150-foot elevation) and the private gated entrance to Villaggio. Major components of the Alternative 1 circulation system are similar to the Project and are summarized below:

**Table 5-4. Comparison of Alternative 1 to the Proposed Project**

Item	Project	Alternative 1	Alternative 1 Difference
<b>Froom Creek</b>			
Froom Creek Realignment	Realigned	Realigned	None
Emergency access road through proposed stormwater detention basin area.	No emergency access road in proposed stormwater detention basin area.	20-foot-wide emergency access road along west edge of proposed stormwater detention basin area.	Emergency access road would replace the Project's proposed emergency access road through Mountainbrook Church. Drainage crossings would be required for Drainage 1 and Drainage 4.
<b>Residential Uses</b>			
Residential: Acreage	39.1 acres	30.9 acres	-8.2 acres
Residential: Units	578 units/51 beds	578 units/51 beds	None
Mix of Units	534 R-3-SP units 44 R-4-SP units	404 R-3-SP units 174 R-4-SP units	-130 R-3-SP units +130 R-4-SP units
<b>Retail Commercial Uses</b>			
Acreage	3.1 acres	3.1 acres	None
Maximum Square Footage	100,000 sf	100,000 sf	None
Potential Uses	Hotel, restaurants, and other commercial	Hotel, restaurants, and other commercial	None
<b>Open Space &amp; Parks</b>			
Open Space: Acreage	59.0 acres	66.9 acres	+7.9 acres
Parks: Acreage	2.9 acres	3.3 acres	+0.4 acres
Parks: Number	1 trailhead Park	1 trailhead Park	None
<b>Building Heights</b>			
Maximum Height	Residential: 20' to 45' (1 to 3 stories) Tower: 55'	Residential: 20' to 55' (1 to 4 stories) Tower: 60'	+10' (1 story) residential buildings +5' tower

- 1) A proposed signalized intersection with LOVR and the proposed main entrance to serve as the primary access to the Specific Plan area;
- 2) Widening of LOVR along a portion of the Project site's frontage;
- 3) Proposed internal roadway network consisting of public and private roads;
- 4) Proposed bicycle and pedestrian facilities throughout the Specific Plan area;
- 5) Parking facilities to accommodate residents, employees, and visitors within the Specific Plan area; and
- 6) A new bus stop that would be integrated into the regional public transportation system.

Major circulation improvements under Alternative 1 within Madonna Froom Ranch and the lower portion of Villaggio would be the same as under the proposed Project. As with the Project, primary access to the Specific Plan area under Alternative 1 would be via a new two-lane road Commercial Collector "A", which would intersect with LOVR at Auto

Park Way and would be located approximately 1,000 feet south of the intersection of Froom Ranch Way with LOVR. The intersection would be signalized and would provide four-way pedestrian crosswalks.

Alternative 1 would include improvements to an 813-foot-long segment of LOVR along the northeastern boundary of the Specific Plan area at the proposed intersection of Commercial Collector “A” and LOVR. LOVR would be widened along this segment by about 35 feet into the Specific Plan area to accommodate new left and right turn lanes into the Project site (Figure 2-9). Alternative 1 would also include restriping the existing travel lanes, Class II bicycle lanes, and center median along this segment and a new sidewalk and parkway would be installed along approximately 550 feet of the west side of LOVR to connect to the Project site entrance (see Figure 2-10 in Chapter 2, *Project Description*). Bicycle racks would continue to be provided at the proposed retail commercial zone and the trailhead park within Madonna Froom Ranch.

Similar to the Project, all roadways within Madonna Froom Ranch would be open to the public and accessible by motorists, bicyclists, and pedestrians from LOVR. Similar to the Project, Alternative 1 would also include two public Commercial Collector roadways, “A” and “B”. Commercial Collector “A” would connect LOVR to residential and commercial areas within Madonna Froom Ranch. Commercial Collector “B” would connect to the main entrance to Villaggio and terminate at the Project site’s boundary to the north to only allow pedestrian, bicycle, and emergency access to Irish Hills Plaza. Local Road “A” would be a public roadway that extends to residential areas within Madonna Froom Ranch and to the proposed trailhead park. Proposed Class II striped bicycle lanes would be included along Commercial Collector “A” and Class III bicycle routes would be provided along Commercial Collector “B” and Local Road “A” to connect the public park and residential areas within Madonna Froom Ranch. All roads in Madonna Froom Ranch would have sidewalks, similar to the Project (see Figure 2-11 in Chapter 2, *Project Description*).

As with the Project, all roadways within Villaggio would be private roads. Similar to the Project, Alternative 1 would include Local Roads “B” and “C” as private roads within Villaggio (see Figure 2-11 in Chapter 2, *Project Description*). Local Road “B” would serve as the primary ingress/egress to Villaggio from Commercial Collector “B” to the Villaggio entrance gate. Local Road “C” would provide private access throughout Villaggio and would not provide sidewalks; however, a network of private walking trails separated from vehicle roadways would be provided for Villaggio residents similar to the Project (see Figure 2-12 in Chapter 2, *Project Description*).



Alternative 1 would include the proposed Froom Creek Trail that would be accessible from Madonna Froom Ranch, Villaggio, and the existing Irish Hills Natural Reserve trails system. The proposed Froom Creek Trail would be a 6-foot-wide, decomposed granite (or other stabilized natural surface) public pedestrian trail along the north bank of the realigned Froom Creek. Under Alternative 1, the public trail would terminate at a wetlands viewing area adjacent to a Villaggio gated access point similar to the Project, but would provide an additional connection through to the proposed emergency access road in the proposed stormwater detention basin area. This additional connection would give pedestrians the opportunity to reach the public trail and its connections to the Irish Hills Natural Reserve and proposed public park, as well as Irish Hills Plaza, from Calle Joaquin, including the adjacent hotel properties. In contrast to the Project, under Alternative 1, the trailhead park would be located at the highest elevation on the Madonna Froom Ranch side of the site, immediately adjacent to the Irish Hills Natural Reserve, providing complementary amenities and direct access to this existing City open space.

Parking would be similar to the proposed Project and provided in accordance with City development standards consistent with the requirements of Chapter 17.16 of the City Municipal Code. Parking in Madonna Froom Ranch residential and commercial areas would be provided via surface parking lots while parking in Villaggio would be a combination of surface parking lots and subterranean parking garages. A public surface lot would be located within the trailhead park, as under the Project.

Similar to the Project, a single new bus stop is proposed at the site's main entrance at Auto Park Way. Refer to Section 3.13, *Transportation and Traffic*, for a more complete description of transit operations.

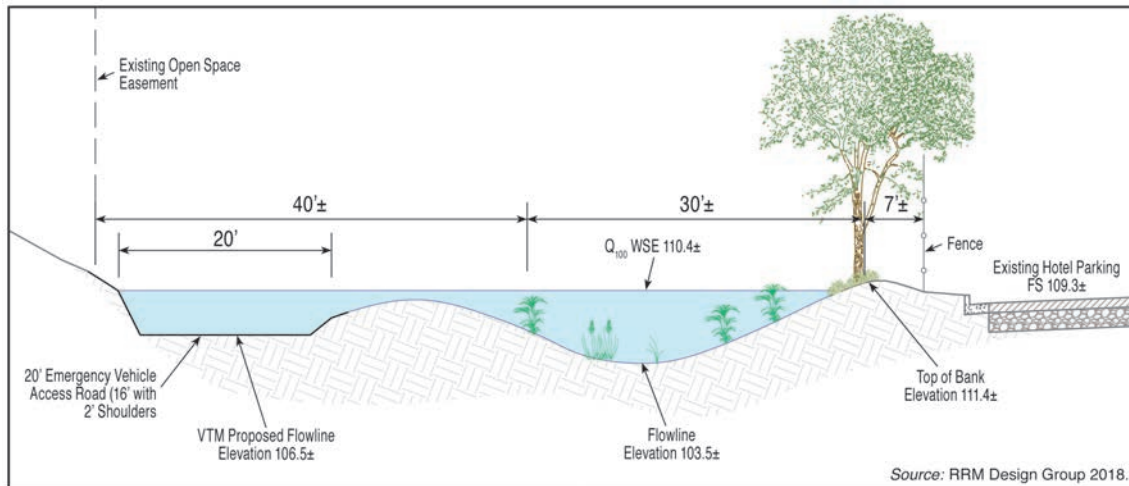
### Emergency Access

Emergency access to Mountainbrook Church would not be part of Alternative 1. Rather, emergency access would be provided via three different connections:

1. From the Irish Hills Plaza into Madonna Froom Ranch. A paved, level connection between Madonna Froom Ranch and Irish Hills Plaza would be provided near the end of Commercial Collector "B" and controlled with removable bollards that would be opened under emergency conditions, such as wildfire evacuation. This would require an easement from Irish Hills Plaza owners.
2. From LOVR to Villaggio. Another emergency access point would be provided via construction of a new free span bridge and access road across the realigned Froom

Creek channel to connect LOVR with Villaggio. This bridge and access road would be located roughly 800 feet east of the primary project entrance at Auto Park Way.

3. From Calle Joaquin to Villaggio through the proposed stormwater detention basin area. Because the two emergency access routes described above would funnel all evacuees onto LOVR and introduce challenges for ingress and egress of emergency responders, an additional 20-foot-wide paved emergency access road would be installed along the western edge of the proposed stormwater detention basin to connect Calle Joaquin to the Project site (see Figure 5-1); however, evacuees along this route would also ultimately funnel to LOVR further south and would connect to U.S. 101. This alternate emergency access road is included in Alternative 1 to replace the Project’s proposed emergency access through Mountainbrook Church and would supplement the two emergency access points discussed above to ensure a southern access/evacuation route for Villaggio that connects with Calle Joaquin, similar to the Project (See Figures 5-1 and 5-3). Given that this road would be immediately adjacent to the proposed stormwater detention basin, during times of very high stormwater flows the road could be partially submerged. Given that this road is intended primarily for emergency access during the fire season (e.g., typically August-November), occasional submersions during periods of heavy rain appears consistent with its use as a fire evacuation or access route. Figure 5-3 presents a conceptual design, but final engineering design would account for City standards.



Emergency Access Road Cross Section

**FIGURE 5-3**

### Onsite Historic Structures

Similar to the Project, Alternative 1 would include relocation of three structures contributing to the historic Froom Ranch Dairy complex, namely the creamery, the main residence, and the dairy barn, to the public park area; the fourth contributing structure, the granary, would remain in place within the park. These four structures would be rehabilitated and adaptively reused as part of the trailhead park, including interpretive signage/displays to document the history of Froom Ranch. The buildings would be relocated and reconstructed on graded terrain to maintain the historic configuration and proportional relationship of the buildings to each other. Similar to the Project, three contributing structures (shed/storage building, old barn, and bunkhouse) to the potential historic district would be demolished and removed from the site, and documented consistent with Secretary of Interior (SOI) standards.

### Proposed Housing and Population

The proposed mix of housing types under Alternative 1 would be similar to the Project with slight modifications to the location/extent of residential zones and distribution of units within each zone; the allocation of units between different allowable densities and product types (e.g., Life Plan Community, multi-family units) would remain similar. Alternative 1 would alter the land use plan and incrementally adjust dwelling unit allocation, resulting in a reduction of 130 R-3-SP units to be replaced with an increase of 130 R-4-SP units, a net zero change (Table 5-5).

Similar to the Project, proposed housing components of Alternative 1 would include a mix of single-family or duplex units in Villaggio and higher density multi-family condominiums and apartments in both Madonna Froom Ranch and Villaggio. Residential uses would have a similar mix of housing densities and average lot sizes as proposed for the Project, with dispersed single-story Villas, two story Garden Terraces, and up to four-story buildings supporting Piazza Apartments and Community Village Apartment suites. Exact unit layout and design is not currently known (see Appendix C for Applicant's conceptual site plan that informed Alternative 1).



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

Residential Housing Type	Project Proposed Units	Project Estimated Population	Alternative 1 Proposed Units	Alternative 1 Estimated Population <sup>1</sup>
R-3-SP - Villaggio	404 units/51 beds	825 people	404 units/51 beds	825 people
R-3-SP – Madonna Froom Ranch <sup>2</sup>	130 units	303 people	-	-
R-4-SP -Madonna Froom Ranch <sup>2</sup>	44 units	103 people	174 units	406 people
<b>TOTAL</b>	<b>578 units/51 beds</b>	<b>1,231 people</b>	<b>578 units/51 beds</b>	<b>1,231 people</b>

<sup>1</sup> Population estimates are based on the number of units multiplied by the average number of persons per household Based on the 2050 Regional Growth Forecast, the City’s average persons per household is 2.33 as of 2015 (SLOCOG 2017)

<sup>2</sup>Per City zoning, R-3 and R-4 units are expressed as density units. The number of actual dwelling units in the R-3 and R-4 zone may vary depending on the number of bedrooms.

Project Construction and Phasing

Similar to the Project, this EIR analysis assumes that Alternative 1 construction would occur over approximately five years between 2020 and 2024 although Alternative 1 would only require three phases (see Table 5-6).

- Phase 1 would involve construction activities including site preparation such as grading, realignment of Froom Creek, and installation of roadways, utility infrastructure, and trails.
- Phase 2 would include final grading and vertical development of Villaggio (to be located entirely in the lower portion of the site).
- Phase 3 would include final grading and vertical development of Madonna Froom Ranch, including extension of utilities and construction of residential and commercial buildings.

Each phase of Alternative 1 would follow a progression of stages similar to that proposed for the Project, as follows: construction design and permitting, site preparation and grading, construction, and final landscaping. Equipment anticipated for use during these stages would be similar to that of the Project. Alternative 1 would include a different assortment of construction activities within each construction phase, but it would follow a similar progression of development within the Project site. Each phase would be subject to permit review to ensure conformity with the approved FRSP, 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.

Table 5-6 identifies which project component would occur within each phase.

**Table 5-6. Alternative 1 Construction Phasing**

Phase	Project Component	Year	Estimated Grading (cy) <sup>1</sup>
1	<p><b><i>Installation of Project Infrastructure and Stormwater Management System.</i></b></p> <ul style="list-style-type: none"> <li>• Rough grading for Madonna Froom Ranch and distribution of export material to Phase 2 (31,800 cy stockpiled onsite).</li> <li>• Realign Froom Creek and reconstruct creek corridor.</li> <li>• Install proposed stormwater detention basin with emergency access road and bridge between Villaggio and Calle Joaquin.</li> <li>• Widen LOVR and install frontage improvements along LOVR, including bicycle lanes, sidewalks, bus stop, and signalized intersection.</li> <li>• Install onsite public roads (Commercial Collectors “A” and “B” and associated bicycle lanes and sidewalks).</li> <li>• Install public utility connections along Commercial Collectors “A” and “B”.</li> <li>• Construct crossing across Froom Creek from Commercial Collector “B”.</li> <li>• Construct crossing across Froom Creek from Local Road “C” to LOVR for emergency access.</li> <li>• Modify Irish Hills Plaza drainage, including modifications to the vegetated channel prior to connection with the realigned Froom Creek.</li> <li>• Install stormwater management system, including removal of existing culverts and onsite stormwater detention basin.</li> <li>• Installation of Froom Creek Trail.</li> <li>• Begin site clearing of lower portion of Villaggio in preparation for Phase 2.</li> </ul>	2020 - 2021	65,800 cut/ 34,000 fill
2	<p><b><i>Development of Villaggio.</i></b></p> <ul style="list-style-type: none"> <li>• Grading of the lower portion of the Villaggio site and import fill materials (158,000 cy import).</li> <li>• Install onsite private roads (Local Roads “B” and part of “C”).</li> <li>• Extend utility lines throughout Villaggio.</li> <li>• Construct water quality treatment areas within Phase 2.</li> <li>• Install fencing and pedestrian access gates.</li> <li>• Construct Villaggio residential uses.</li> <li>• Construct the Villaggio Health Administration Building.</li> <li>• Construct the Wellness Center.</li> <li>• Begin site clearing of Madonna Froom Ranch in preparation for Phase 3.</li> </ul>	2020 - 2023	27,500 cut/ 185,000 fill

**Table 5-6. Alternative 1 Construction Phasing (Continued)**

Phase	Project Component	Year	Estimated Grading (cy) <sup>1</sup>
3	<b><i>Development of Madonna Froom Ranch.</i></b>	2023-2024	0 cut/ 0 fill
	• Extend utility lines throughout Madonna Froom Ranch.		
	• Construction of multi-family units within Madonna Froom Ranch.		
	• Construct commercial retail buildings, including hotel, within Madonna Froom Ranch.		
	• Construction of the public park.		

<sup>1</sup>Grading estimates (cy) are approximate.

Analysis – Alternative 1 (Clustered Development Below the 150-Foot Elevation Alternative – Actionable Alternative)

The significance of each impact resulting from implementation of Alternative 1 has been determined based on impact significance criteria and applicable CEQA Guidelines for each impact topic (see Table 5-7).

**Table 5-7. Alternative 1 Impacts, Mitigation Measures, and Residual Impacts**

Impacts	Mitigation Measures	Residual Significance
<b>3.1 Aesthetics and Visual Resources</b>		
VIS-1. Alternative 1 implementation would change views of scenic resources, including hillsides, rock outcroppings, open space, and historic buildings, from a State Scenic Highway or local scenic roadway.	MM VIS-1	Less than Significant with Mitigation (Incrementally Less)
VIS-2. Alternative 1 would significantly impact the existing visual character of the site by changing a rural setting to a commercial and residential setting, particularly as viewed from the Irish Hills Natural Reserve trail system.	MM VIS-1	Less than Significant with Mitigation (Less)
VIS-3. Alternative 1 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)
<b>3.2 Agricultural Resources</b>		
AG-1. Alternative 1 would convert onsite Farmland of Local Potential and prime soils if irrigated to non-agricultural uses.	None Required	Less than Significant (Similar)
AG-2. Implementation of Alternative 1 would create potential conflicts with existing agricultural zoning.	None Required	Less than Significant (Incrementally Less)
AG-3. Alternative 1 adjust the boundary of an existing open space and agricultural conservation easement to a location that would reduce the viability of agricultural operations within the recorded easement.	None Required	Less than Significant (Similar)

**Table 5-7. Alternative 1 Impacts, Mitigation Measures, and Residual Impacts (Continued)**

Impacts	Mitigation Measures	Residual Significance
<b>3.3 Air Quality and Greenhouse Gas Emissions</b>		
AQ-1. Alternative 1 would result in potentially significant construction-related emissions, including dust and air pollutant emissions.	MM AQ-1 MM AQ-2 MM AQ-3	Less than Significant with Mitigation (Incrementally Less)
AQ-2. Alternative 1 would result in potentially significant long-term operational emissions.	MM AQ-4	Significant and Unavoidable (Incrementally Less)
AQ-3. Release of toxic diesel emissions or naturally occurring asbestos during construction of Alternative 1 could expose sensitive receptors to emissions-related health risks.	None required	Less than Significant (Incrementally Less)
AQ-4. Alternative 1 would be consistent with the City’s Climate Action Plan, but would result in potentially significant GHG emissions during construction and operation which would be inconsistent with other state and local goals for reducing GHG emissions.	MM AQ-4 MM AQ-5 MM AQ-6	Significant and Unavoidable (Incrementally Less)
AQ-5. Alternative 1 is potentially inconsistent with the SLO County APCD’s Clean Air Plan.	MM AQ-2 MM TRANS-5 MM TRANS-8 MM TRANS-9 MM TRANS-10	Significant and Unavoidable (Similar)
<b>3.4 Biological Resources</b>		
BIO-1. Alternative 1 implementation would impact sensitive riparian, wetland, and native grassland habitats identified as sensitive natural communities under state and City policy.	MM BIO-1 MM BIO-2 MM BIO-3 MM BIO-4 MM BIO-5 MM BIO-6 MM BIO-7 MM BIO-8 MM BIO-Alt. 1 MM HAZ-2	Less than Significant with Mitigation (Less)
BIO-2. Alternative 1 implementation would have substantial direct and indirect adverse impacts on candidate, sensitive, or special-status species that are known to or may occur on the Project site.	MM BIO-1 MM BIO-9 MM BIO-10 MM BIO-11 MM BIO-12 MM HAZ-2	Less than Significant with Mitigation (Less)
BIO-3. Alternative 1 implementation would have a substantial adverse impact on state and federally protected wetlands.	MM BIO-1 MM BIO-2 MM BIO-4 MM BIO-5 MM BIO-6	Significant and Unavoidable (Less)

**Table 5-7. Alternative 1 Impacts, Mitigation Measures, and Residual Impacts (Continued)**

Impacts	Mitigation Measures	Residual Significance
	MM BIO-7 MM BIO-Alt. 1	
BIO-4. Alternative 1 construction and operation would have a substantial adverse impact on the movement of resident or migratory fish or wildlife species or resident and migratory wildlife corridors along Froom Creek, Drainages 1, 2, and 3 and across open grasslands on the Upper Terrace of the Project site.	MM BIO-1 MM BIO-2 MM BIO-3 MM BIO-4 MM BIO-5 MM BIO-6 MM BIO-9 MM BIO-11 MM BIO-12 MM BIO-14	Less than Significant with Mitigation (Less)
BIO-5. Alternative 1 construction would result in the potential disturbance, trimming, or removal of up to 75 mature trees.	MM BIO-15	Less than Significant with Mitigation (Incrementally Less)
<b>3.5 Cultural and Tribal Resources</b>		
CR-1. Alternative 1 grading and construction would occur within areas of prehistoric archaeological sensitivity with the potential to impact subsurface cultural or tribal cultural resources.	MM CR-1 MM CR-2 MM CR-3 MM CR-4 MM CR-5 MM CR-6 MM CR-7	Less than Significant with Mitigation (Incrementally Less)
CR-2. Future resident recreational activities could impact archaeological resources located within proposed open space.	MM CR-8	Less than Significant with Mitigation (Less)
CR-3. Alternative 1 would result in relocation, demolition, disturbance, and/or removal of historic resources onsite, including individually eligible historic resources and a historic district.	MM CR-9 MM CR-10 MM CR-11 MM CR-12 MM CR-13 MM CR-14	Significant and Unavoidable (Similar)
<b>3.6 Geology and Soils</b>		
GEO-1. Alternative 1 would expose people or structures to adverse effects from earthquakes and seismically induced hazards.	None required	Less than Significant (Similar)
GEO-2. Alternative 1 has the potential to exacerbate potential soils hazards, including expansive soils, differential settlement, and subsidence.	None required	Less than Significant (Similar)
GEO-3. Alternative 1 would potentially cause erosion, landslides, and rockfall.	None required	Less than Significant (Similar)
GEO-4. Alternative 1 would include subterranean parking in Villaggio and may require groundwater dewatering in areas with high groundwater.	None required	Less than Significant (Similar)

**Table 5-7. Alternative 1 Impacts, Mitigation Measures, and Residual Impacts (Continued)**

Impacts	Mitigation Measures	Residual Significance
GEO-5. Alternative 1 construction could uncover paleontological resources in geologic deposits during earthwork activities. If improperly handled, such resources could be adversely impacted.	MM GEO-1	Less than Significant with Mitigation (Similar)
<b>3.7 Hazards, Hazardous Materials, and Wildfires</b>		
HAZ-1. Alternative 1 would exacerbate wildfire risks by exposing occupants to wildfire hazards and impairing emergency response and would require wildfire fuel management in the Irish Hills Natural Reserve.	MM HAZ-1 MM HAZ-2 MM HAZ-3 MM HAZ-4 MM HAZ-5	Significant and Unavoidable (Less)
HAZ-2. Alternative 1 would potentially expose persons to toxic, hazardous, or otherwise harmful chemicals through accidental conditions involving the release of hazardous materials into the environment.	None required	Less than Significant (Similar)
HAZ-3. Alternative 1 site is located within the 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)
<b>3.8 Hydrology and Water Quality</b>		
HYD-1. Alternative 1 construction activities would result in impacts to water quality due to polluted runoff and increased erosion or siltation.	MM HYD-1 MM HYD-2 MM HYD-3	Less than Significant with Mitigation (Less)
HYD-2. Alternative 1 would potentially exacerbate flooding and erosion hazards onsite and in areas downstream, particularly related to the proposed alignment and design of Froom Creek and developed areas of the site.	MM HYD-4	Less than Significant with Mitigation (Similar)
HYD-3. Operation of Alternative 1 would potentially impact water quality of Froom Creek and San Luis Obispo Creek due to polluted urban runoff and sedimentation.	None required	Less than Significant (Similar)
HYD-4. Alternative 1 would involve development of new impervious surfaces and potentially interfere with groundwater recharge.	None required	Less than Significant (Similar)
<b>3.9 Land Use and Planning</b>		
LU-1. Alternative 1 would allow urban development above the 150-foot elevation and would relocate portions of the Froom Ranch Dairy complex, which would potentially conflict with City General Plan policies adopted for the purpose of avoiding impacts to visual, biological, and cultural resources and wildfire hazards.	MM BIO-1 MM BIO-2 MM BIO-3 MM BIO-4 MM BIO-5 MM BIO-6 MM BIO-9 MM BIO-10 MM BIO-11	Significant and Unavoidable (Less)

**Table 5-7. Alternative 1 Impacts, Mitigation Measures, and Residual Impacts (Continued)**

Impacts	Mitigation Measures	Residual Significance
	MM BIO-12 MM BIO-13 MM BIO-14 MM CR-9 MM CR-10 MM CR-11 MM CR-12 MM CR-13 MM CR-14 MM HAZ-1 MM HAZ-2 MM HAZ-3 MM HAZ-4 MM HAZ-5	
LU-2. Alternative 1 would potentially be inconsistent with existing easements and setback requirements onsite.	None Required	Less than Significant (Incrementally Less)
<b>3.10 Noise</b>		
NO-1. Alternative 1 construction, including site grading and heavy truck trips, would generate noise levels that exceed thresholds established in the City's General Plan NE and Noise Guidebook with potential impacts to sensitive receptors.	MM NO-1 MM NO-2 MM NO-3	Less than Significant with Mitigation (Incrementally Less)
NO-2. Alternative 1 construction activities (e.g., excavation, transportation of heavy equipment) could result in exposure of sensitive receptors and buildings to excessive groundborne vibration.	None required	Less than Significant (Less)
NO-3. Long-term operational noise impacts would include higher roadway noise levels from increased vehicle traffic generated by Alternative 1, Alternative 1 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 Guidelines.	None Required	Less than Significant (Similar)
NO-4. Future residents and occupants of Alternative 1 could be exposed to periodic high noise levels from nearby commercial uses (e.g., delivery trucks, forklifts, backup alarms) that would exceed City thresholds for residential land uses.	MM NO-4	Less than Significant with Mitigation (Similar)
<b>3.11 Population and Housing</b>		
PH-1. Residential and commercial development associated with the Project would induce population growth.	None required	Less than Significant (Similar)
PH-2. Alternative 1 would provide additional housing for the City, assisting the jobs-to-housing ratio.	None required	Less than Significant (Similar)



**Table 5-7. Alternative 1 Impacts, Mitigation Measures, and Residual Impacts (Continued)**

Impacts	Mitigation Measures	Residual Significance
PH-3. The construction of affordable housing units under the Project would provide additional affordable housing for the City.	None required	Less than Significant (Similar)
<b>3.12 Public Services and Recreation</b>		
PS-1. Alternative 1 would increase demand on the SLOPD for police protection services.	None required	Less than Significant (Similar)
PS-2. Alternative 1 would increase the demand for SLOFD and CALFIRE fire protection services and create potential declines in firefighter-to-resident ratios, however would be located within the accepted response time performance area. Development of senior residential uses, which are associated with extraordinary calls for emergency medical service, would increase emergency calls for service beyond what the SLOFD anticipates being able to accommodate.	None required	Less than Significant (Similar)
PS-3. Alternative 1 would generate increases in enrollment at public schools (especially C.L. Elementary and Laguna Middle).	None required	Less than Significant (Similar)
PS-4. Alternative 1 would increase the demand for public parkland and neighborhood parks from increased residential population.	MM PS-1 MM PS-2	Less than Significant with Mitigation (Incrementally Less)
<b>3.13 Transportation and Traffic</b>		
TRANS-1. Alternative 1 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	Less than Significant with Mitigation (Incrementally Less)
TRANS-2. Under Existing plus Project conditions, the addition of Alternative 1 traffic would exacerbate existing queuing and peak hour traffic for automobiles, and poor levels of service for pedestrians and bicycle modes of transportation, causing transportation deficiencies in the Project vicinity.	MM AQ-6 MM TRANS-2 MM TRANS-3 MM TRANS-4 MM TRANS-5 MM TRANS-6 MM TRANS-7 MM TRANS-8 MM TRANS-9 MM TRANS-10 MM TRANS-11	Significant and Unavoidable (Similar)
TRANS-3. Under Near-Term plus Project (Scenario 2) conditions, the addition of Alternative 1 traffic would exacerbate existing queuing and peak hour traffic for automobiles and poor levels of service for pedestrians and bike modes of transportation,	MM TRANS-2 MM TRANS-5 MM TRANS-6 MM TRANS-8 MM TRANS-9 MM TRANS-12	Significant and Unavoidable (Similar)



**Table 5-7. Alternative 1 Impacts, Mitigation Measures, and Residual Impacts (Continued)**

Impacts	Mitigation Measures	Residual Significance
causing transportation deficiencies in the Project vicinity.	MM TRANS-13 MM TRANS-14 MM TRANS-15 MM TRANS-16 MM TRANS-17 MM TRANS-18 MM TRANS-19 MM TRANS-20	
TRANS-4. Alternative 1 would result in traffic safety impacts and inadequate emergency access and evacuation options, resulting in potential for structural damage, injuries, or loss of life due to wildland fires or other emergency situations.	MM HAZ-4 MM TRANS-21 MM TRANS-22 MM TRANS-23	Less than Significant with Mitigation (Incrementally Less)
TRANS-5. Onsite circulation would result in safety impacts to pedestrian and bicycle access.	MM TRANS-24	Less than Significant with Mitigation (Incrementally Less)
TRANS-6. Under long-term Cumulative plus Project conditions, Alternative 1-generated traffic would result in a cumulatively considerable contribution to traffic for automobiles and poor levels of service for pedestrians and bike modes of transportation, causing transportation deficiencies in the Project vicinity.	MM TRANS-8 MM TRANS-9 MM TRANS-13 MM TRANS-25 MM TRANS-26 MM TRANS-27 MM TRANS-28 MM TRANS-29 MM TRANS-30	Less than Significant with Mitigation (Incrementally Less)
<b>3.14 Utilities and Energy Conservation</b>		
UT-1. Alternative 1 would require the expansion of utility infrastructure to serve new development, including water, sewer, natural gas, and electricity into the site; the construction of which could cause environmental effects.	MM AQ-1 MM BIO-1 MM CR-3 MM CR-4 MM CR-5 MM HAZ-1 MM HYD-1 MM HYD-2 MM NO-1 MM NO-2 MM NO-3 MM NO-4 MM TRANS-1 MM UT-1	Less than Significant with Mitigation (Less)
UT-2. Alternative 1-related increases in water use would increase demand for the City's potable water supply.	None required	Less than Significant (Similar)

**Table 5-7. Alternative 1 Impacts, Mitigation Measures, and Residual Impacts (Continued)**

Impacts	Mitigation Measures	Residual Significance
UT-3. Alternative 1-generated wastewater would contribute to demand for wastewater collection facilities and remaining available and planned capacity of the City’s WRRF.	MM UT-2	Less than Significant with Mitigation (Similar)
UT-4. Alternative 1 would generate additional solid waste for disposal at the Cold Canyon Landfill.	None required	Less than Significant (Incrementally Less)
UT-5. Alternative 1 would result in an increase of energy consumption and requirement for additional energy resources.	None required	Less than Significant (Similar)
<b>3.15 Mineral Resources</b>		
MN-1. Alternative 1 implementation would result in the loss of the existing onsite red rock quarry (Froom Ranch Pit).	None required	Less than Significant (Similar)

*Aesthetics and Visual Resources*

Under Alternative 1, site design alterations would substantially reduce aesthetic impacts in comparison to the Project. Although total residential units and commercial square footage would remain the same, urban development would not occur above the 150-foot elevation line. Avoiding development of the Upper Terrace of Villaggio would reduce impacts to scenic resources, including natural habitats, historic resources, and rock outcroppings, that are visible to viewers in the surrounding area, including within the public trail system of the Irish Hills Natural Reserve. Further, relocation of the public park to the northwest corner of the Project site would relocate residential development to areas below the 150-foot elevation and reduce impacts to the scenic transition between adjacent natural habitats and residential development in the Madonna Froom Ranch.

Impact VIS-1 regarding impacts to scenic resources from a state scenic highway or local scenic roadway would be similar impacts under the Project. Unlike the Project, Alternative 1 would not include development within the Upper Terrace and scenic natural resources within this area, including serpentine rock outcroppings, woodlands, open grasslands and riparian habitat, would be preserved. Similar to the Project, impacts to views from the portion of U.S. 101 eligible for State Scenic Highway designation would not be significant, nor would impacts to viewers along Calle Joaquin (see KVA 1). Similar to the Project, views from LOVR would be substantially impacted, and increased building density and height under Alternative 1 would incrementally increase the severity of these impacts (see KVAs 2 and 3). However, implementation of MM VIS-1 would ensure that landscape

screening shields views of development as much as possible, and impacts would continue to be *less than significant with mitigation*.

Impact VIS-2, which addresses impacts to the visual character of the Project site, would be substantially reduced under Alternative 1 as compared to the Project. While residential buildings would be up to 10 feet taller under the Project, the overall aerial extent and level of development and associated changes in aesthetic character of the Project site would be less than under the Project. Under Alternative 1, the Upper Terrace of Villaggio would remain undeveloped and scenic undeveloped open grasslands, woodlands, and chaparral habitats adjacent to the Irish Hills Natural Reserve would remain intact. Alternative 1



*Alternative 1 would eliminate development of the Upper Terrace portion of Villaggio, preserving open space within scenic vistas designated by the General Plan COSE. Photo source: hikespeak.com*

would improve the visual transition between the Irish Hills Natural Reserve and residential development as compared to the Project by relocating the public park adjacent to the Irish Hills Natural Reserve and relocating residential uses eastward. By avoiding development above the 150-foot elevation line, Alternative 1 would preserve aesthetic resources and provide a more natural transition from rural to urban settings, particularly for viewers located above proposed development within the Irish Hills Natural Reserve (see Alternative KVAs 4 and 5). Including implementation of MM VIS-1, impacts under Alternative 1 would be substantially less than under the Project and would be *less than significant with mitigation*.

Impact VIS-3, associated with increased night lighting, would remain largely similar to the Project as the levels of lighting would be similar under this alternative. However, avoiding residential development within the Upper Terrace of Villaggio and northwestern portion of the Project site would reduce the overall development footprint and adverse impacts from nighttime lighting or glare, particularly adjacent to the Irish Hills Natural Reserve. Accordingly, as under the Project, impacts would be considered *less than significant* under Alternative 1.

## 5.0 ALTERNATIVES

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Cumulative impacts on visual resources would be less than under the Project. Cumulative development is anticipated in the General Plan LUE and would be consistent with impacts associated with implementation of City General Plan policies. Alternative 1, in combination with approved, pending, and proposed development in San Luis Obispo, would contribute toward creating a transition from the rural environment along the City's perimeter to the urban environment. Consistent with long-term buildout under the General Plan, Alternative 1 and cumulative projects would be required to adhere to the design standards of the General Plan LUE and would be subject to discretionary review by the Planning Commission and/or City Council, as well as final design review by the Architectural Review Commission (with a recommendation to the final action hearing body). As identified in the LUCE Update EIR, all development that adheres to the General Plan LUE policies would result in less than significant impacts to aesthetic and visual resources. Unlike the Project, Alternative 1 would not include urban development above the 150-foot elevation line and would not be inconsistent with City policies designed to preserve scenic resources including Policy LUE 6.4, *Hillside Policies*. Additionally, this alternative would not include growth-inducing effects on adjacent parcels to create pressure for development above the 150-foot elevation. Therefore, the potential for cumulative impacts to aesthetic and visual resources would be less when compared to the Project and would be considered *less than significant with mitigation*.

*KVA 1 – Project Compared to Alternative 1*



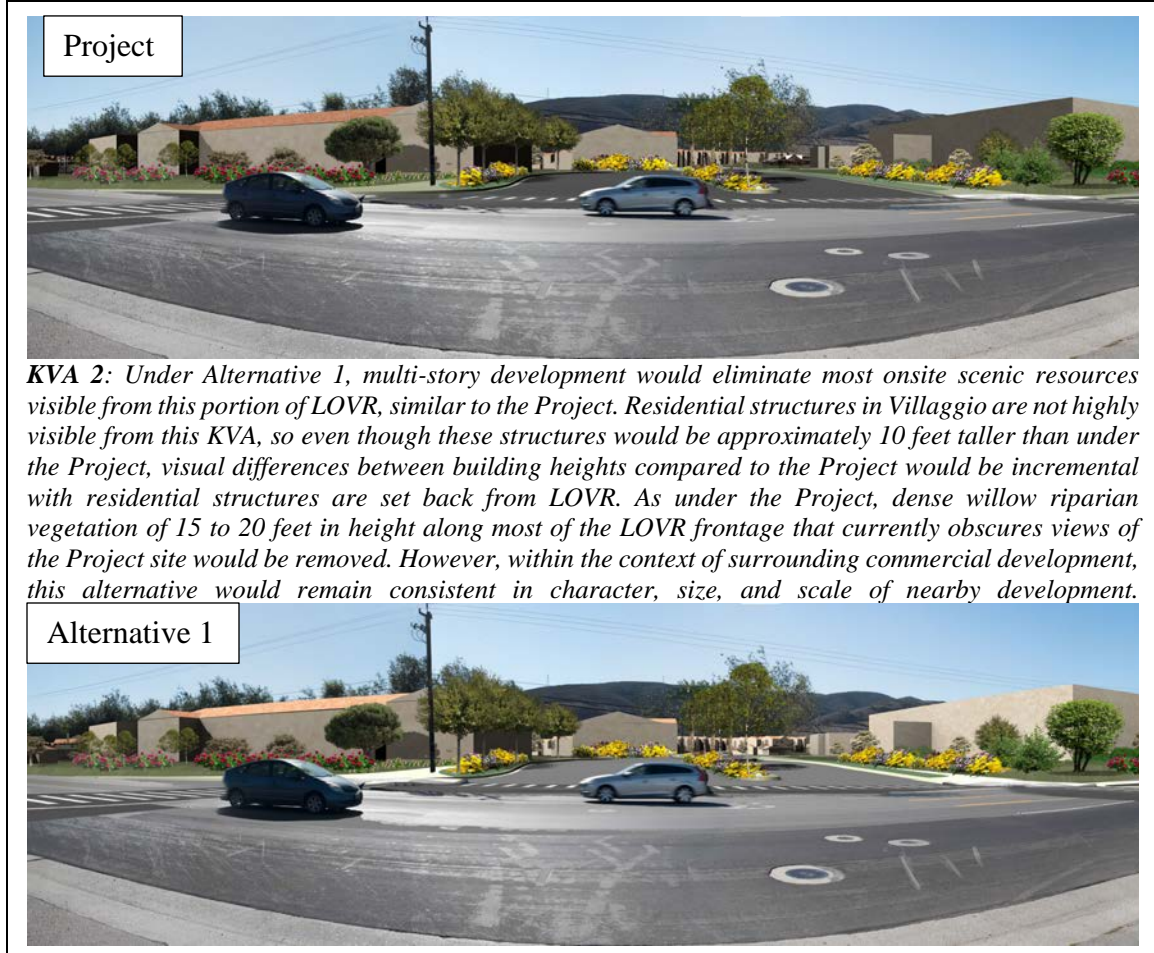
*KVA 1: Fleeting distant views of the Project site are available from U.S. 101. Under Alternative 1, the Upper Terrace would not be developed and direct views to the Irish Hills, including ridgelines, outcroppings, and natural vegetation, would be improved. Residential structures under this Alternative would be up to 10 feet taller than under the Project, but since the view from U.S. 101 is distant and channelized along Calle Joaquin, the increase in height is incremental and would not be noticed by viewers compared to the Project. Commercial development and street trees up to approximately 20 to 30 feet high, as well as telephone poles and wiring, would continue to impede views of the Project site.*





**5.0 ALTERNATIVES**

*KVA 2 – Project Compared to Alternative 1*



*KVA 3 – Project Compared to Alternative 1*

Project

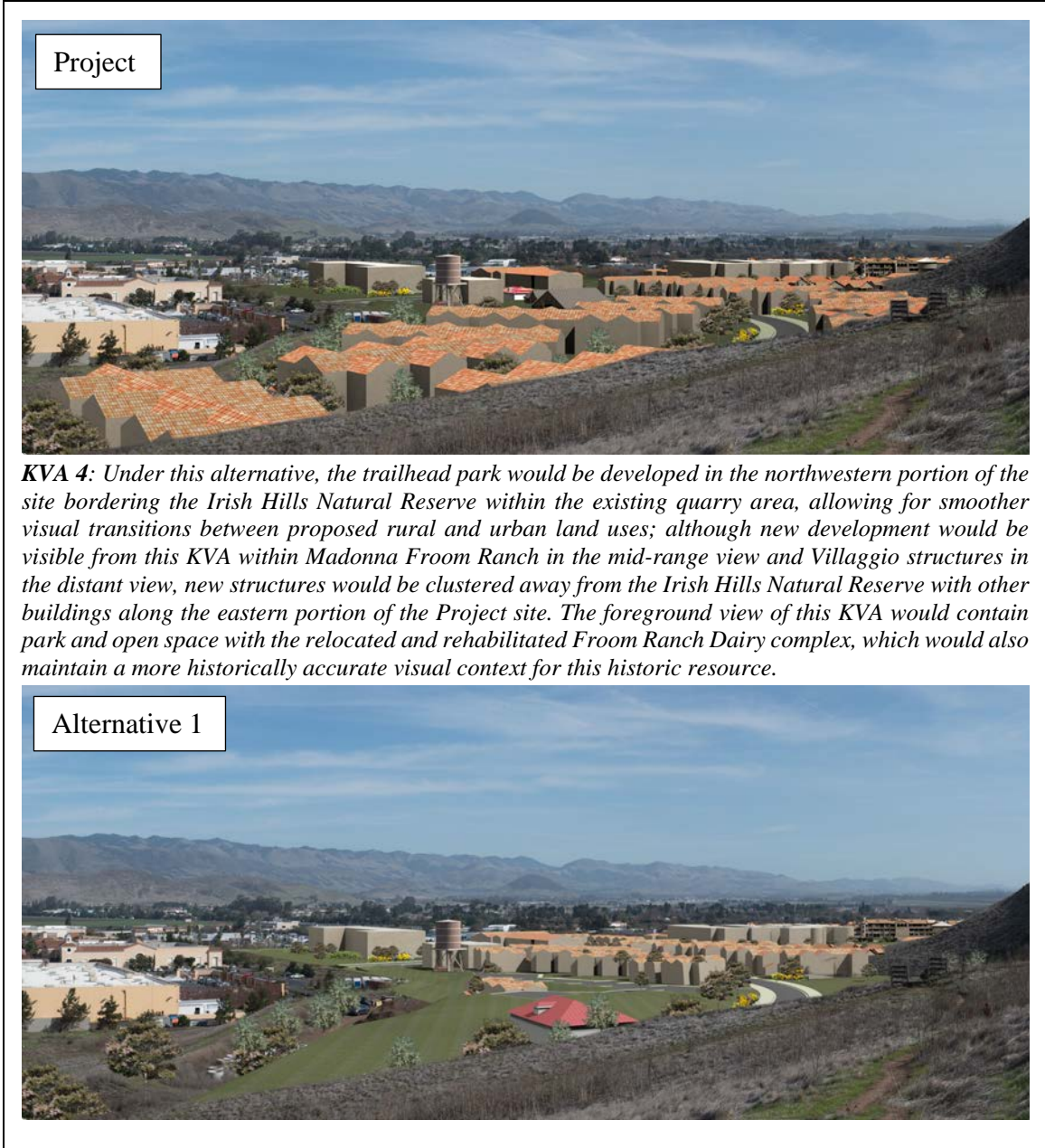


*KVA 3: As under the Project, development of multi-story residential buildings would impede visibility of aesthetic resources, including hillsides of the Irish Hills Natural Reserve, from the LOVR Overpass. Residential buildings in Villaggio allowed under this alternative would be up to 10 feet taller than under the Project, although views from this KVA would only be incrementally different given intervening distances. However, as no development would be permitted above the 150-foot elevation, views of the Irish Hills and associated scenic natural features would be maintained.*

Alternative 1



*KVA 4 – Project Compared to Alternative 1*



***KVA 4:** Under this alternative, the trailhead park would be developed in the northwestern portion of the site bordering the Irish Hills Natural Reserve within the existing quarry area, allowing for smoother visual transitions between proposed rural and urban land uses; although new development would be visible from this KVA within Madonna Froom Ranch in the mid-range view and Villaggio structures in the distant view, new structures would be clustered away from the Irish Hills Natural Reserve with other buildings along the eastern portion of the Project site. The foreground view of this KVA would contain park and open space with the relocated and rehabilitated Froom Ranch Dairy complex, which would also maintain a more historically accurate visual context for this historic resource.*



*KVA 5 – Project Compared to Alternative 1*



*KVA 5: Impacts to visual and scenic resources from this KVA would be less than under the Project, as development of residential units within the Upper Terrace would be avoided, preserving views of natural habitats and other scenic resources in this area. While remaining multi-story buildings on the Project site would be up to 10 feet taller than under the Project, these changes would appear incremental from this KVA given intervening distances and adjacent urban land uses to the north and east.*



### *Agricultural Resources*

Similar to the Project, development of Villaggio and Madonna Froom Ranch and associated urban infrastructure under this alternative would continue to result in permanent conversion of prime soils if irrigated to urban development, along with disruption of existing grazing activities on the site. Similar to the Project, development occurring under Alternative 1 would convert the majority of agricultural soils onsite, which are considered prime farmland if irrigated. Since the Upper Terrace of the Villaggio would not be developed, loss of grazing land and Farmland of Local Potential occurring above the 150-foot elevation would not occur under this alternative.

Impact AG-1, which addresses the development of land designated as Farmland of Local Potential to non-agricultural uses, would be similar under Alternative 1. As under the Project, this alternative would not result development of soils that are considered prime as no prime soils exist onsite. Therefore, impacts would remain *less than significant*.

Impact AG-2, addressing potential agricultural zoning conflicts, would be reduced under Alternative 1, although development of urban uses on agricultural land considered prime if irrigated would continue to occur. Unlike the Project, residential land uses would not be constructed in the Upper Terrace of Villaggio, thereby avoiding development on agricultural lands within this area. As under the Project, Alternative 1 would be planned for urban development with a Specific Plan (SP) land use designation under the General Plan LUE and the Project would be consistent with Policy 1.7.3, *Interim Uses*, where grazing uses would continue until urban development occurs under a Specific Plan. Therefore, similar to the Project, Impact AG-2 would be adverse, but *less than significant*.

Impact AG-3, associated with reduced viability of the existing agricultural easement within the Project site, would be similar to the Project, since the agricultural easement overlies areas within the Lower Area. However, realignment of the easement would support conservation of habitat and biological resources, particularly the protection of existing wetlands within this 1.6-acre portion east of Calle Joaquin, which is consistent with the easement's preservation intent. Thus, adjustment of the 7.1-acre easement would continue to meet the objectives and LAFCO requirements of the easement agreement and impacts, like the Project, are considered *less than significant*.

As under the Project, this alternative would contribute incrementally to the loss of agricultural land (Grazing Land and Farmland of Local Potential) to development within the City. However, this alternative would not contribute to the loss of Important Farmland.

Other cumulative development within the City that would result in the conversion of agricultural resources would be subject to Policy 1.9.2 in the LUE, Prime Agricultural Land, and Policy 8.6.3 in the COSE, Required Mitigation. Therefore, this alternative would not contribute to a cumulatively considerable loss of significant agricultural resources, and cumulative impacts would remain *less than significant*.

#### *Air Quality and GHG Emissions*

As under the Project, this alternative would use the same construction equipment, contain similar land uses, the same number of residential units, and would result in similar trip generation and air quality emissions. CalEEMod modeling for this alternative identifies impacts that would be slightly less compared to the Project (see Tables 5-8 through 5-12, below; also see Appendix D) largely due to the reduced area of disturbance required to construct the development by eliminating development above the 150-foot elevation on the site.

Impact AQ-1, which addresses construction emissions, would be similar to the Project. Alternative 1 would involve slightly more construction activities on site at the same time and increased import of fill, as excess material would no longer be available from onsite grading within the Upper Terrace of Villaggio. This would create a slightly higher maximum daily emissions level from air emissions; Alternative 1 is estimated to generate a maximum of 3.55 lbs/day more reactive organic gases (ROG) and nitrogen oxides (NO<sub>x</sub>) compared to the Project, which is nominal, and daily maximum PM<sub>2.5</sub> is estimated to decrease by 0.57 lbs/day compared to the Project. This impact would be similar to the Project and construction-related air quality impacts would still exceed the SLO County APCD's Tier 1 Quarterly thresholds for construction emissions of ROGs and NO<sub>x</sub> (Table 5-8 and 5-9). As under the Project, required implementation of a Construction Activity Management Plan (CAMP) (MM AQ-1), use of low or no volatile organic compound-emission paint (MM AQ-2), and use of an offsite mitigation strategy (MM AQ-3), would bring DPM emissions below SLO County APCD Tier 2 and Tier 1 quarterly thresholds. Implementation of these mitigation measures would reduce construction-related air quality impacts to a less than significant level, consistent with SLO County APCD methodology. Therefore, residual impacts under this alternative would remain *less than significant with mitigation*.

**Table 5-8. Maximum Short-term Construction Emissions (Unmitigated)**

	ROG	NO <sub>x</sub>	ROG + NO <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>10</sub>	DPM (Exhaust PM <sub>2.5</sub> )
<b>Overall Construction (Maximum Daily Emission)</b>							
Peak Daily Emissions (lbs/day)	182.08	193.29	375.37	110.21	0.27	30.88	6.66
Peak Quarterly Emissions (tons/qtr) <sup>1</sup>	1.16	5.52	8.24 <sup>2</sup>	3.17	<0.01	0.91	0.19
APCD Daily Thresholds (lbs/day)	--	--	137	--	--	--	7
APCD Quarterly Thresholds – Tier 1 (tons/qtr)	--	--	2.5	--	--	2.5	0.13
Above Threshold?	--	--	<b>YES</b>	--	--	NO	<b>YES</b>
APCD Quarterly Thresholds – Tier 2 (tons/qtr)	--	--	6.3	--	--	--	0.32
Above Threshold?	--	--	<b>YES</b>	--	--	NO	NO

<sup>1</sup> tons/qtr calculated based on maximum annual emissions divided by four (i.e., one quarter of a year).

<sup>2</sup> tons/qtr for ROG + NO<sub>x</sub> emissions calculated in CalEEMod.

See Appendix D for CalEEMod worksheets.

**Table 5-9. Maximum Short-term Construction Emissions (Mitigated)**

	ROG	NO <sub>x</sub>	ROG + NO <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>10</sub>	DPM (Exhaust PM <sub>2.5</sub> )	CO <sub>2e</sub>
<b>Overall Construction (Maximum Daily Emission)</b>								
(lbs/day)	60.71	122.86	183.57	129.39	0.27	19.24	4.36	27,336
(tons/qtr) includes Fugitive Dust <sup>1</sup>	0.42	3.49	5.09 <sup>2</sup>	3.73	<0.01	0.52	0.13	698
APCD Daily Thresholds (lbs/day)	--	--	137	--	--	--	7	--
APCD Quarterly Thresholds – Tier 1 (tons/qtr)	--	--	2.5	--	--	2.5	0.13	--
Above Threshold?	--	--	<b>YES</b>	--	--	NO	NO	--
APCD Quarterly Thresholds – Tier 2 (tons/qtr)	--	--	6.3	--	--	--	0.32	--
Above Threshold?	--	--	NO	--	--	NO	NO	--

<sup>1</sup> tons/qtr calculated based on maximum annual emissions divided by four (i.e., one quarter of a year).

<sup>2</sup> tons/qtr for ROG + NO<sub>x</sub> emissions calculated in CalEEMod.

See Appendix D for CalEEMod worksheets.

Impact AQ-2, addressing long-term impacts of operational air emissions, would be similar to the Project. This Alternative has the same number of residential units and commercial square footage, which would have similar trip generation, energy demand, and water demand as the Project. Therefore, operational-related air quality impacts from onsite energy use, water demand, and mobile emissions would be the same as the Project. Like the Project, while this alternative would not exceed annual emissions thresholds, projected maximum daily emissions would be above the established APCD daily thresholds for operational emissions of ROG + NO<sub>x</sub> (see Table 5-10). Like the Project, implementation of MM AQ-4, which requires implementation of all feasible measures within Table 3-5 of the APCD CEQA Air Quality Handbook (see Table 3.3-9), would also apply to reduce adverse operational effects. However, many of the measures listed in MM AQ-4 do not include quantifiable air quality emissions reductions. As a result, the CalEEMod results for Alternative 1 demonstrate that Alternative 1 operational emissions would exceed SLOAPCD's maximum daily thresholds for ROG and NO<sub>x</sub>. Therefore, like the Project, long-term operational impacts would continue to be *significant and unavoidable*.

Impact AQ-3, addressing toxic air contaminants (TAC) or naturally occurring asbestos (NOA), would be less than under the Project. There are no existing sensitive receptors on the Project site or vicinity that would be exposed to significant Project construction emissions. Unlike the Project, no occupation of the site would occur concurrent with heavy-haul truck traffic, grading, and excavating, so the potential for exposure of residents to TAC from diesel emissions during construction would be substantially reduced or avoided. Further, areas within the Upper Terrace that potentially contain NOA would not be excavated under Alternative 1 and any soil-disturbing excavation would occur prior to occupancy of Villaggio or Madonna Froom Ranch. Similar to the Project, this alternative is outside of recommended buffer zones of sources of potential TAC, such as congested highways or intersections, and planned residential and commercial uses would not generate substantial amounts of TACs. Therefore, this alternative is not expected to expose sensitive receptors to substantial levels of TACs or NOA. Therefore, as under the Project, impacts would continue to be considered *less than significant*.

**Table 5-10. Maximum Long-term Operational Emissions (Unmitigated)**

	ROG	NO <sub>x</sub>	ROG + NO <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>10</sub>	DPM (Exhaust PM <sub>10</sub> )	CO <sub>2e</sub>
<b>Overall Operational (Maximum Daily Emission)</b>								
Area (lbs/day)	24.27	0.60	24.87	51.96	<0.01	0.29	0.29	96
Energy (lbs/day)	0.38	3.35	3.73	2.16	0.02	0.26	0.26	4,169
Mobile (lbs/day)	6.70	23.10	29.80	65.53	0.21	20.47	0.17	21,212
Total (lbs/day)	31.35	27.05	58.4	119.65	0.24	21.00	0.72	25,477
Threshold (lbs/day)	-	-	25	550	-	25	1.25	-
Significance?	-	-	<b>YES</b>	NO	-	NO	NO	-
<b>Overall Operational (Annual Emission)</b>								
<b>Area (tons/year)</b>	4.40	0.10	4.50	8.57	<0.01	0.05	0.05	14
<b>Energy (tons/year)</b>	0.07	0.61	0.68	0.39	<0.01	0.05	0.05	2,235
<b>Mobile (tons/year)</b>	1.05	3.99	5.04	11.06	0.03	3.35	0.03	3,129
<b>Waste (tons/year)</b>	-	-	-	-	-	-	-	253
<b>Water (tons/year)</b>	-	-	-	-	-	-	-	142
<b>Total (tons/year)</b>	5.52	4.7	10.22	20.02	0.05	3.45	0.13	5,773
<b>Threshold (tons/year)</b>	-	-	25	-	-	25	-	-
<b>Significant?</b>	-	-	NO	-	-	NO		-

Note: Values in this table are rounded for reporting purposes. See Appendix D for CalEEMod worksheets.

Impact AQ-4, addressing global climate change from GHG emissions, would be similar to the Project. While Alternative 1 would substantially reduce the area of disturbance and onsite excavation and earthmoving, this alternative would need increased offsite import of fill, since excavation of the Upper Terrace would not occur and would not provide an onsite source of needed fill for Madonna Froom Ranch. These increased diesel haul truck trips would slightly increase construction-related GHG emissions based on CalEEMod estimates, by approximately 6.6 metric tons of carbon dioxide equivalent (MT CO<sub>2e</sub>) more than the Project’s total GHG emissions, which is within the margin of error for such

projections. Construction activities under this alternative would generate an estimated 7,859 MT CO<sub>2</sub>e (see Tables 5-11 and 5-12). Amortized over a 25-year period (consistent with SLO County APCD methodology), construction of Alternative 1 would result in approximately 314 MT CO<sub>2</sub>e per year (MT CO<sub>2</sub>e/yr). Unmitigated operational GHG emissions generated by Alternative 1 would be approximately 5,773 MT CO<sub>2</sub>e. Combined with construction emissions amortized over a 25-year period (314 MT CO<sub>2</sub>e), total unmitigated GHG emissions would be approximately 6,087 MT CO<sub>2</sub>e. Similar to the Project, Alternative 1 would need to consider the goals of SB 32 and statewide goals for GHG reduction by 2030. With application of MM AQ-4 through -6 to include site-specific and communitywide GHG reduction strategies in the FRSP to attain as close to 0 MT CO<sub>2</sub>e/yr as feasible for stationary source emissions; however, mobile source emissions have potential to result in continued inconsistency with GHG reduction targets. Impact AQ-4 would remain significant and unavoidable.

**Table 5-11. Estimated Construction GHG Emissions (Unmitigated)**

Year	Annual Emissions MT CO <sub>2</sub> e
2020	2,791
2021	1,560
2022	1,689
2023	1,020
2024	799
<b>Total</b>	<b>7,859</b>
<i>Amortized over 25 years</i>	<i>314</i>

**Table 5-12. Estimated Operational GHG Emissions (Unmitigated)**

Emission Source	Annual Emissions MT CO <sub>2</sub> e
Area	14
Energy Use	2,235
Mobile	3,129
Water Use	253
Solid Waste	142
Total	5,773
<i>Amortized Construction Emissions</i>	<i>314</i>
<b>Total Project GHG Emissions</b>	<b>6,087</b>

Under Alternative 1, Impact AQ-5 would be similar to the Project with regards to potential inconsistencies with the Clean Air Plan. Population increases under Alternative 1 would be similar to the Project, as would total added average daily trips (ADT). As a result, similar to the Project, the rate of increase in population would continue to exceed the allowable rate of increase in vehicle trips and miles traveled, and would therefore remain inconsistent with the Clean Air Plan. As under the Project, Alternative 1 would install one new bus stop along southbound LOVR during Phase 1, ensuring transit services would be available in the Project vicinity prior to occupancy of the first unit. Despite implementation of MM AQ-2, MM TRANS-5, and MM TRANS-8 through -10 requiring reductions in Project VMTs, this alternative would remain inconsistent with the City's Clean Air Plan due to continued exceedance of population growth, vehicle trip, and VMT projections for the region. Similar to the Project, impacts would be *significant and unavoidable*.

Cumulative air quality impacts would be similar to the Project. This alternative would also result in significant and unavoidable long-term operational air quality impacts within an Air Basin that is in non-attainment and would, therefore, contribute to cumulatively considerable impacts to air quality emissions in the region. In addition, the LUCE Update Final EIR also determined that full buildout under the General Plan would be potentially inconsistent with the Clean Air Plan, and that cumulative impacts related to the increase in air quality emissions resulting from implementation of this alternative would be *significant and unavoidable*.

This alternative would contribute incrementally to GHG emissions regionally and statewide, but MM AQ-4 through MM AQ-6 would reduce construction and operational emissions to as close to 0 MT CO<sub>2</sub>e/yr as feasible, consistent with SB 32 and emerging City regulation requiring net-zero GHG emissions by 2035. Therefore, this alternative would not contribute to a cumulatively considerable contribution of GHGs, and cumulative impacts would be *less than significant with mitigation*, similar to the Project.

### *Biological Resources*

Under this alternative, biological resource impacts related to loss of wetland, riparian, and upland habitats and potential effects on sensitive, threatened, and endangered species would be substantially reduced compared to the Project. Residences and related infrastructure would not be constructed within the Upper Terrace of Villaggio, which would substantially reduce impacts to serpentine native bunchgrass grassland habitats and minimize impacts to springs, seeps, and wetland habitats along Drainages 1, 2, and 3, as well as associated impacts to 12 special status plant species in the Upper Terrace. Impacts



to wildlife movement and wildlife corridors would also be substantially reduced and consistency with the policies of the City General Plan would be substantially increased. In particular, consistency with LUE Policies 1.8.6, *Wildlife Habitats*, and 6.4.7, *Hillside Planning Areas*, and COSE Policies 7.3.1, *Protect Listed Species*, 7.3.2, *Protect Species of Local Concern*, 7.3.3, *Wildlife Habitat and Corridors*, and 7.7.7, *Preserve Ecotones*, would be improved.



*Potential impacts to approximately 3.9 acres of native serpentine bunchgrass grassland habitat and associated special status plant species would be avoided under Alternative 1.*

However, development in the southwest corner of the lower portion of Villaggio, consisting of up to 12 Villas along Froom Creek and within a cul-de-sac at the confluence of Drainages 1, 2 and 3 and adjacent to a large serpentine outcrop, would continue to impact sensitive biological resources and create potential inconsistencies with City General Plan policies. The residential cul-de-sac with Villas would be

located immediately adjacent to wetlands along Drainages 1, 2, and 3 and potential special status plants on an adjacent serpentine rock outcrop. The development would also be located proximate to California bay woodland and may generate the need for fire buffer clearance within this woodland. Although reduced when compared to the Project, the Villas would continue to isolate the restored Froom Creek and sensitive natural communities such as the Calle Joaquin wetlands and LOVR ditch riparian habitat from high quality grassland and other habitats in the southern portion of the Project site above the 150-foot elevation line and the Irish Hills Natural Reserve. While these natural communities would continue to have a connection to the Irish Hills along the portion of the restored Froom Creek located between Villaggio and Madonna Froom Ranch, the broad existing ecotones with grasslands would be eliminated. While this alternative would substantially reduce impacts and improve consistency with City General Plan Policies, these units and associated infrastructure would continue to interrupt habitat continuity, wildlife habitat and corridors, and potentially impact special status plant species and thus would remain potentially inconsistent with the intent of multiple City General Plan policies, particularly COSE Policies 7.3.2, 7.3.3 and 7.7.7. Similar to the Project, this impact would require mitigation for targeted site redesign to reduce and/or avoid, as further described below.

## 5.0 ALTERNATIVES

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Impact BIO-1, addressing construction impacts on sensitive riparian, wetland, and native grassland habitats, identified as sensitive natural communities under state and City policy, would be less severe than under the Project, as residential development above the 150-foot elevation would not occur, thereby preserving the highest-quality habitat within the site. Avoiding development in the Upper Terrace of Villaggio would preserve approximately 3.9 acres of native serpentine bunchgrass grassland habitat that would be impacted under the Project. This bunchgrass is a designated sensitive natural community considered biologically important by the California Department of Fish and Wildlife (CDFW). By avoiding development in the Upper Terrace of Villaggio, this alternative would reduce the perimeter length of residential development abutting open space by approximately 3,904 feet, equating to a 49 percent reduction of the wildland-urban interface. This would reduce habitat disturbance related to construction and maintenance of on- and offsite wildfire buffers by approximately 9.0 acres, including impacts to serpentine rock outcroppings and native serpentine bunchgrass grassland habitat.

Due to a reduced amount of development and required vegetation clearance for wildfire protection, 3.23 acres of coast live oak/California bay woodland habitat and 6.85 acres of coastal shrub/chaparral habitat would no longer be impacted. In addition, sensitive habitats within the Upper Terrace would not be subject to gradual degradation over time through trampling, landscape maintenance, introduction of non-native species, or other activities of new residents. Additionally, this alternative would not result in grading, vegetation clearance and management, or culvert-headwall installation along the majority of Drainages 1, 2, or 3, reducing Project impacts to creek, stream, and wetland habitat, as well as associated endangered species.

Impacts of Alternative 1 on riparian habitat areas would be similar to the Project. Permanent direct loss of 1.13 acres of riparian scrub would result from construction of the proposed stormwater detention basin, realignment of the Froom Creek corridor, widening of LOVR, and construction of a new Project entrance road. Similar to the Project, major changes to the hydrology of the Calle Joaquin wetlands could result in adverse effects to the long-term biological



*Avoidance of impacts to Drainages 1, 2, and 3 under Alternative 1 would also reduce impacts to the Calle Joaquin wetlands, which provides high-quality habitat for several plant and animal species (Appendix E).*

productivity or functions of these wetlands, as well as impacts to water quality and sensitive habitat from potential introduction of sediment runoff, siltation, and accidental spillage of fuel and lubricants.

Unlike the Project, this alternative would also include construction of two additional emergency access roads that could impact native riparian habitats. The first emergency access road would cross the proposed Froom Creek realignment and the LOVR ditch to provide access to LOVR approximately 800 feet southeast from the primary Project access road at Auto Park Way. Although Applicant-prepared conceptual plans do not provide specific details, this road would require construction of a second free-span bridge of approximately 24 feet in width across the 60-foot-wide realigned Froom Creek channel and a new box culvert of 24 to 48 inches across the LOVR ditch. This new emergency access road would lead to additional habitat loss and fragmentation and would further decrease the hydrologic and habitat connectivity within Froom Creek and the LOVR ditch as compared to the Project. Under this alternative, an additional emergency access road would also be constructed along the southwest edge of the proposed stormwater detention basin on the Mountainbrook Church property easement. This emergency access would connect to Calle Joaquin and would cross the confluence of the three drainages near Froom Creek, as well as cross Drainage 4 near Calle Joaquin, an intermittent, willow-lined roadside conveyance. While conceptual plans are not currently available, this access road would also likely be 24 feet in width and would require installation of a box culvert across Drainage 4, impacting willow riparian vegetation.

Similar to the Project, the following mitigation measures would be required to minimize potential impacts:

- MM BIO-1: implementation of a Biological Mitigation Plan
- MM BIO-2: ensures a qualified Environmental Monitor will oversee compliance of construction activities with the Biological Mitigation Plan.
- MM BIO-3: requirement that the Biological Mitigation Plan include a Habitat Mitigation and Monitoring Plan.
- MM BIO-4: requirement that the Biological Mitigation Plan include avoidance and replacement of sensitive natural communities outside approved development footprints.
- MM BIO-5: mitigates temporary and permanent impacts to wetlands, grasslands, and riparian habitat.
- MM BIO-6: timing and implementation requirements for habitat restoration. MM BIO-13: requires relocation of buildings along the confluence of Drainages 1, 2,

and 3 and Froom Creek outside of a buffer from the water courses to increase ecologic and hydrologic connectivity.

- MM HAZ-1: a Community Fire Protection Plan that protects sensitive habitats and species to the maximum extent possible.

The potential impacts to biological resources from Alternative 1 would be substantially lessened with inclusion of the Project's mitigation measures listed above. Policy consistency with the General Plan would also be greatly improved. However, since the emergency access roadways connecting Villaggio to Calle Joaquin and LOVR have not been designed or engineered yet, it is possible that these features may have significant impacts on riparian communities along the LOVR ditch and realigned Froom Creek and on Drainage 4. For this reason, an additional mitigation measure MM BIO-Alt. 1 is identified to ensure these alternative features are specifically mitigated.

*MM BIO-Alt. 1      The additional emergency access roadway across Froom Creek and the LOVR ditch and the southern emergency access route entering the site from Calle Joaquin shall be reviewed by the City's Public Works Department, Community Development Department, Natural Resources Manager, and Fire Department prior to adoption of the Final FRSP and approval of the Vesting Tentative Tract Map to ensure that design is adequate for City emergency ingress/egress standards and minimizes impacts to riparian vegetation and wildlife passage, and that adequate on- and offsite mitigation of impacted riparian and wetland vegetation is provided. The City shall ensure review and approval of these features as part of the Final FRSP considers the siting, alignment, width, materials, and access controls.*

**Alternative 1 Plan Requirements and Timing.** The Applicant is required to implement the above mitigation measures prior to FRSP and Vesting Tentative Tract Map (VTTM) approval. The access roads shall be integrated into the VTTM preliminary grading plan. City staff shall ensure the above measures are incorporated into the FRSP and VTTM prior to acceptance of the final FRSP.

**Monitoring.** The City shall ensure the above measure is incorporated into the Final FRSP and VTTM prior to Project approval.

Implementation of MM BIO-Alt. 1 under Alternative 1 would further reduce impacts to riparian and wetland habitats as compared to the Project. Potential alignment of the southern emergency access route under MM BIO-Alt. 1 would be designed to reduce impacts of crossing the confluence of Drainages 1, 2, and 3 and Drainage 4.

Alternative 1 would substantially reduce impacts to sensitive habitats and species and wildlife corridors as compared to the Project, particularly those associated with habitats in the Upper Terrace. This alternative as modified by the above mitigation measures would improve consistency with several policies within the City General Plan adopted to protect important natural resources, including LUE Policies 1.8.6, *Wildlife Habitats*, and 6.4.7, *Hillside Planning Areas*, and COSE Policies 7.3.1, *Protect Listed Species*, 7.3.2, *Protect Species of Local Concern*, 7.3.3, *Wildlife Habitat and Corridors*, and 7.7.7, *Preserve Ecotones*. Because Alternative 1 would not develop the Upper Terrace and would be required to implement additional mitigation measures to avoid disturbance, alteration, or removal of high value habitats, Impact BIO-1 would be substantially less than under the Project and would be considered *less than significant with mitigation*.

Impact BIO-2, which addresses direct and indirect adverse impacts on candidate, sensitive, or special status species that are known to or may occur on the Project site, would also be substantially reduced under Alternative 1. Unlike the Project, Alternative 1 would substantially reduce impacts to sensitive habitats in the Upper Terrace that support 12 known special status plant species, as well as the potential occurrence of several other species. Woodland areas and other habitats in the Upper Terrace would not be impacted by fire clearance, protecting foraging, roosting, and nesting habitat for several Species of Special Concern, including bats and birds. Additionally, avoidance of development within the Upper Terrace would protect the majority of Drainages 1, 2, and 3 where these drainages support a federally endangered species and provide water to sensitive plant and animal species.

Although the development footprint for Alternative 1 would be considerably smaller than the Project, direct and indirect impacts to species on- and offsite could continue similar to the Project, including those resulting from construction noise, increased human presence, and potential exposure to pollutants and hazardous materials. Riparian and wetland habitats and associated species would also continue to be impacted.



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Mitigation measures proposed under the Project would also be implemented to reduce potential impacts. These would include implementation of MM HAZ-2, MM BIO-1, as well as MM BIO-9, ensuring access to riparian habitat for special status species would not be interrupted during construction. MM BIO-10, minimizing impacts to Chorro Creek Bog Thistle, MM BIO-11, ensuring the Biological Mitigation Plan addresses special status wildlife species management,



*Alternative 1 would preserve approximately 0.25 acres of rare seep wetlands in the Upper Terrace and ensure hydrologic connectivity between Drainages 1, 2, and 3 and downstream wetlands, including the Calle Joaquin wetlands.*

and MM BIO-12, ensuring the Biological Mitigation Plan includes bat colony and migratory and nesting bird management, would also apply. MM BIO-13 would also further reduce impacts to creek, stream, and wetland habitat and increase habitat connectivity between the realigned Froom Creek corridor and the high quality habitats in the Upper Terrace area of Villaggio and the Irish Hills Natural Reserve through relocation of residential development and associated road infrastructure outside an adequate buffer around the confluence of Drainages 1, 2, and 3, which flow to Froom Creek. Given that development within the Upper Terrace would not occur and all applicable mitigation measures would be implemented under Alternative 1 as under the Project, Alternative 1 would have substantially reduced impacts on candidate, sensitive, or endangered species known to exist on the Project site and impacts would be *less than significant with mitigation*.

Impact BIO-3, addressing Project impacts to federally-protected wetlands, would be decreased as compared to the Project. Unlike the Project, this alternative would not include installation of culvert-headwalls or otherwise disturb Drainages 1, 2, or 3 except near the convergence of these drainages, and would avoid approximately 0.25 acres of rare seep wetlands in the Upper Terrace, as well as water sources for adjacent and downstream riparian and wetland habitat. However, CDFW and USACE jurisdictional wetlands, including the LOVR ditch and Calle Joaquin wetlands, would continue to be impacted as a result of LOVR frontage improvements, emergency access road construction, and Froom Creek realignment. As under the Project, implementation of MM BIO-4 would preserve

open space at the confluence of Drainages 1, 2, and 3 and would greatly enhance hydrologic connectivity between the Upper Terrace and downstream wetlands. Additionally, geotechnical recommendations required in MM BIO-7 to reduce potential for horizontal directional drilling operations to adversely affect Calle Joaquin wetlands would still be required.

However, interruption or redirection of ground and surface water sources for these wetlands from realignment of Froom Creek and adjacent development could still result in changes in wetland habitats and characteristics. While implementation of MM BIO-1 through -3, MM BIO-5 through -7, and MM BIO-13 would partially reduce impacts to USFWS and CDFW jurisdictional wetland areas through avoidance to the maximum extent feasible of on- or offsite wetlands, full replacement of equivalent wetland values if wetlands are affected would be challenging. Although impacts to wetlands in the Upper Terrace area of Villaggio would be less than under the Project, direct and indirect impacts to jurisdictional wetlands would continue, and impacts would remain *significant and unavoidable*.

Impact BIO-4 addressing impacts on the movement of resident or migratory wildlife species or resident and migratory wildlife corridors would be substantially reduced under Alternative 1. Unlike the Project, Alternative 1 would avoid all development in the Upper Terrace and would allow wildlife movement across the Upper Terrace and along Drainages 1, 2, and 3, which link Froom Creek through the Project site to the Irish Hills. By avoiding extensive site alteration and construction of new



*Alternative 1 would ensure realigned Froom Creek would connect to high quality habitats in the Upper Terrace and Irish Hills Natural Reserve, allowing for safe passage between these habitats by resident and migratory wildlife.*

homes, roadways, trails, fences, and utility and drainage infrastructure within the Upper Terrace, Alternative 1 would reduce noise, lighting, and glare that would disrupt wildlife movement across the Project site. Implementation MM BIO-13 through -14 and MM BIO Alt. 1 would further reduce such impacts. As under the Project, Calle Joaquin wetlands and the restored Froom Creek channel could be isolated from wildlife and habitats in the Upper Terrace and Irish Hills Natural Reserve, replacing existing broad open grassland ecotones that currently link these habitats with intensive development, particularly near the

confluence of Drainages 1, 2, and 3. While the realigned and restored Froom Creek corridor is proposed to provide enhanced riparian habitat, it would be an urban creek corridor bordered by relatively intensive development that would limit movement of terrestrial and avian species. Long-term impacts to migrating species would be similar to the Project due to the increase in human presence onsite, including lighting located on buildings and in parking areas, increased noise from automobiles, and other human activities. These long-term impacts could cause these species to be killed, to flee the area, or could disrupt breeding and nesting efforts.

As under the Project, implementation of MM BIO-1 through -2, BIO-5 through -6, BIO-9, BIO-11 through -12, and MM BIO-13 would reduce potential impacts to resident or migratory wildlife and resident or migratory corridors. By ensuring the ability of resident or migratory wildlife to access high quality habitats, Impact BIO-4 would be substantially less severe when compared to the Project and would be considered *less than significant with mitigation*.



*Alternative 1 would reduce impacts to mature trees, including coast live oak/ California bay woodland, and eucalyptus.*

Impact BIO-5, related to the potential disturbance, trimming, or removal of up to 75 mature trees, would be less severe when compared to the Project. On the northwestern side of the site, potentially affected trees are located in the developed/disturbed area adjacent to the existing quarry and construction business. Mature trees in the Upper Terrace in the

southwest portion of the Project site adjacent to Drainages 1, 2, and 3 would also be potentially affected. The land use map for Alternative 1 would designate residential and commercial areas to avoid direct and indirect disturbance to much of the woodland areas that would be developed by the Project in the Upper Terrace, reducing indirect fire clearance impacts to coast live oak and California bay woodlands in particular. Similar to the Project, trimming or work within the rootzone of mature trees for construction or wildfire buffering could indirectly impact these trees. As under the Project, MM BIO-15 would ensure avoidance of trees, and MM BIO-Alt. 1 would protect additional coast live oak/California bay woodlands from development or associated fire management processes. As under the Project, impacts would be *less than significant with mitigation*.



Impacts to biological resources under this alternative would be substantially less than those resulting from the Project. However, as under the Project, following incorporation of all mitigation measures described above, Alternative 1's contribution to regional cumulative impacts to biological resources would be cumulatively considerable and *significant and unavoidable*. Additionally, as discussed in the 2014 LUCE Update EIR, implementation of General Plan LUE policies and compliance with state and federal regulations would ensure cumulative impacts resulting from development under the General Plan LUE would be *less than significant*.

#### *Cultural and Tribal Cultural Resources*

Under Alternative 1, impacts to cultural resources and tribal cultural resources would be less when compared to the Project. Soil disturbance would still occur within areas considered to be sensitive for cultural resources but required grading and excavation would avoid the Upper Terrace, which has a high potential for discovery of buried archeological resources. Similar to the Project, proposed relocation of historic structures within the From Ranch Dairy complex would adversely affect significant historic resources, including a potential historic district. Mitigation measures would continue to be implemented to minimize potential impacts of development and operation on archaeological and prehistoric resources, as well as historic resources.

Impact CR-1 addressing potential to impact subsurface cultural resources would be less severe when compared to the Project. Per the technical studies completed for the FRSP (Appendix F) and the City's Archeological Resource Preservation Program Guidelines, there are two known prehistoric sites and archaeologically sensitive areas within the Project site that may contain undiscovered cultural resources that would be impacted by construction under this alternative, including within the Upper Terrace and a 200-foot area around the top of banks of the existing From Creek. Similar to the Project, mitigation measures would be implemented that would reduce potential impacts. These would include requiring a subsurface archaeological resource evaluation in areas within 200 feet of identified sites (MM CR-1), identification of Environmentally Sensitive Areas (MM CR-2), requiring preparation and implementation of an Archaeological Monitoring Plan (MM CR-3 and MM CR-4), ensuring cessation of construction activities following discovery of prehistoric or historic-period archaeological resources and/or human remains (MM CR-5 and MM CR-7), and ensuring construction personnel receive cultural resources training (MM CR-6). Unlike the Project, no development would occur within the Upper Terrace, an area which supports several recorded archaeological sites and resources. Therefore,

Impact CR-1 would be less than under the Project and considered *less than significant with mitigation*.

Impact CR-2, which addresses potential indirect impacts to archaeological resources resulting from recreational activities of future residents, would be substantially less than under the Project. By avoiding development in the Upper Terrace, proposed residential development would be located more than 100 feet from known archaeological resources and, therefore, less subject to potential indirect disturbance by future residents. Similar to the Project, the nearest residential structures in Villaggio would be enclosed by a security fence under Alternative 1 that would substantially limit incidental access to these cultural resources with the open space area. The archaeologically sensitive areas in the Upper Terrace would be preserved as protected open space under Alternative 1, further protecting them from risks associated with future development within the Specific Plan area. MM CR-8 requiring that recreational facilities and roadways are not located within 50 feet of known resources would also continue to apply. Impact CR-2 would, therefore, be less than under the Project and would be considered *less than significant with mitigation*.

Impact CR-3, addressing impacts to historic resources onsite, would remain similar to the Project, as Alternative 1 would relocate and/or adaptively reuse four Froom Ranch Dairy complex buildings (i.e., main residence, creamery, dairy barn, and granary) within the proposed trailhead park. These structures are eligible for listing on the National Register, California Register, and City Master List of Historic Resources as a historic district. Additionally, several structures onsite that contribute to the potential Froom Ranch Dairy historic district (i.e., the shed, bunkhouse, and old barn) would be demolished similar to the Project.

As under the Project, the following mitigation measures would apply to minimize potential impacts to historic resources:

- MM CR-9: ensures retention of a qualified historic architect to review and comment on construction drawings as well as conduct construction monitoring
- MM CR-10: ensures photo documentation of existing historic buildings
- MM CR-11: requires production of an educational pamphlet regarding cultural and architectural heritage of the site
- MM CR-12: requires the Applicant to maximize reuse of original building material
- MM CR-13: requires preparation of design guidelines and review for construction proximate to the Main Residence
- MM CR-14: requires a preservation plan to protect historic buildings during construction

Relocation and reconstruction of the Froom Ranch Dairy complex, including implementation of the above mitigation measures, would retain sufficient integrity to convey the buildings' significant association with the dairy industry and the Froom family. Retaining the four historic structures that contribute to the potential historic district within the trailhead park and in a natural setting more reminiscent of their historic past than the Project (i.e., set atop a rise against the natural hillside of the Irish Hills rather than set amongst multi-family housing units and commercial buildings) would lessen the potential impact to historic resources as well. However, as under the Project, the loss of three contributors to the potential historic district would also occur under Alternative 1, and, therefore, Impact CR-3 would remain significant and unavoidable.

Similar to the Project, Alternative 1 would contribute to the potential loss of significant archaeological and tribal cultural resources, though its contribution would be less than significant with mitigation identified above. As under the Project, significant and unavoidable impacts associated with the removal, relocation, and reconstruction of features associated with the historic Froom Ranch Dairy complex could occur and would be cumulatively considerable when combined with overall loss of historic resources in the City and surrounding areas for pending and future projects. As such, Alternative 1 would contribute to the cumulative loss of historic resources in the City and result in *significant and unavoidable* cumulative impacts.

#### *Geology and Soils*

Under this alternative, impacts related to geologic and soil resources would be similar when compared to the Project due to similar construction activities, geologic hazards, and minimal impacts. As under the Project, design and construction of proposed land uses would be subject to several requirements and regulations to ensure structural integrity in seismically active areas. By locating development outside of fault setbacks and implementing the most current industry standards for structural design, impacts of structural failure and risks to life and property due to seismic shaking and seismic-related ground failure would be avoided or reduced.

Impact GEO-1, addressing exposure of people or structures to adverse effects from earthquakes and seismically induced hazards, would be similar when compared to the Project. Development would be required to be sited to avoid existing fault lines, and to adhere to the California Building Code (CBC) and the City Municipal Code. Similar to the Project, the Los Osos Fault would cross Madonna Froom Ranch and Alternative 1 would include a development setback from the potentially active Los Osos Fault segments onsite.

## 5.0 ALTERNATIVES

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As under the Project, compliance with state and local building regulations for site preparation and structural design would ensure that seismically induced hazards would remain *less than significant*.

Impact GEO-2, addressing potential for soil hazards, would remain the same as the Project. Potential for subsidence to occur onsite is low and development would not cause or exacerbate subsidence. Grading under Alternative 1 would require approximately 94,000 cubic yards (cy) less fill as compared to the Project. Implementation of recommendations outlined in the Project Soils Engineering Report and the geotechnical recommendations included therein would continue be implemented under Alternative 1 and would reduce impacts related to construction on loose, saturated, or expansive soils. Additionally, compliance with federal, state, and local regulations (i.e., CBC, the City's Safety Element [SE], and the City Municipal Code) would reduce direct impacts associated with expansive soils, differential settlement, and subsidence. As under the Project, impacts from Alternative 1 would be *less than significant*.

Impact GEO-3, which addresses the potential for erosion and landslides, would be less severe when compared to the Project since grading within areas above the 150-foot elevation would not occur. In the lower portions of the site and Madonna Froom Ranch, grading for site development has the potential to expose undocumented fill and existing soft alluvium, which may erode or slide. While there is the potential for limited slope instability to occur during excavation and construction activities, implementation of the CBC and compliance with federal, state, and local regulations would reduce the potential for erosion and long-term impacts during construction, similar to the Project. While potential for landslides to occur at the Project site is considered low, potential impacts would be reduced by removing private access roadways and medium-high density residential uses that are proposed under the Project in the Upper Terrace that would be located within a potential rockfall hazard area. Removal of development from the Upper Terrace under this alternative would also reduce hazards associated with development on steeper slopes. Compliance with applicable regulations and recommendations outlined in the Preliminary Soils Engineering Report and Preliminary Engineering Geology Investigation would further reduce impacts related to erosion or landslides, and impacts would be *less than significant*.

Impact GEO-4, addressing potential groundwater dewatering impacts, would result in impacts similar to those under the Project. Subsurface parking structures constructed in Villaggio adjacent to the realigned Froom Creek could require dewatering. Construction of

these structures could require excavation up to 12 feet below ground surface (bgs), potentially intercepting shallow groundwater observed at a depth of 1.5 to 4.0 feet bgs. As under the Project, compliance with the Preliminary Engineering Geology Investigation recommendations, as well as Occupational Safety and Health Administration regulations, would reduce impacts to *less than significant*.

Impact GEO-5, addressing the potential to uncover and impact paleontological resources in geologic deposits, would be similar to the Project. If paleontological resources were uncovered during construction and were then improperly handled, such unknown paleontological resources could be damaged or destroyed. As under the Project, incorporation of MM GEO-1 would ensure the protection of potential paleontological resources, and impacts would be considered *less than significant with mitigation*.

Cumulative impacts related to geology and soils would result if impacts under Alternative 1, when combined with other past, present, and future projects, would cumulatively increase the potential for geologic hazards, such as ground-shaking, or increased soil impacts, such as erosion. The City Municipal Code and the General Plan SE require all discretionary development within the City to undergo analysis of each site's geological and soil conditions prior to construction. Because all projects would be required to undergo an analysis of site-specific geological and soil conditions, and because restrictions on development would be applied in the event that geological or soil conditions pose a risk to safety, this alternative's contribution to cumulative impacts associated with seismic activity, soil instability, subsidence, collapse, and/or expansive soil would be the same as under the Project and would be considered *less than significant*.

#### *Hazards, Hazardous Materials, and Wildfire*

Under Alternative 1, impacts related to wildfire hazards would be substantially reduced due to reconfiguration of proposed habitable structures to more defensible locations within the site and provision of additional emergency access options for emergency responders. Impacts related to hazardous materials and contamination from spills would be similar to the Project due to extended construction activities. Airport safety hazards would also be similar to the Project.

Impact HAZ-1, addressing exposure of wildfire hazards and emergency response access, would be substantially reduced. The Project site is located in an area with moderate to very high fire hazards due to flammable vegetation onsite and within the adjacent Irish Hills Natural Reserve, as well as due to winds that periodically blow southeast downslope

toward the Project site. As under the Project, adherence to applicable requirements to minimize the risk from accidental construction- and operation-related wildfires, including clearance or management of flammable vegetation within 100 feet of residential development, including within the Irish Hills Natural Reserve, would mitigate this impact. Unlike the Project, all residential development within the Upper Terrace and in the northwestern portion of the site within Madonna Froom Ranch would be retained as open space, reducing wildland-urban interface by approximately 4,750 feet (50 percent of wildland-urban interface under the Project). This increased clustering within lower hazard areas in the lower portion of the site and Madonna Froom Ranch would increase the buffer between new development and very high fire hazard areas.

Impacts resulting from impaired emergency evacuation and exposure of residents and visitors to wildfire hazards would be reduced. Unlike the Project, this alternative would include emergency ingress to the Project site from a new emergency access road and bridge across LOVR ditch to LOVR approximately 800 feet southeast of the main Project entrance and a new emergency access road to Calle Joaquin located along the western edge of the proposed stormwater detention basin (see Figure 5-1). Emergency access through the Irish Hills Plaza would also be included. Therefore, a total of four access routes, including the primary entrance, would provide for evacuation and less congested access to the site for emergency respondents in the case of an emergency.

Under Alternative 1, security fencing, retaining walls, and closely spaced residential units in Villaggio would continue to limit access for firefighters to attack fires threatening residential units adjacent to the Irish Hills Natural Reserve. As under the Project, implementation of several mitigation measures would avoid or reduce impacts. MM HAZ-1, requiring construction measures to reduce the potential for brush or grass fires, MM HAZ-2, requiring preparation of a Community Fire Protection Plan, and MM HAZ-3, requiring designation of smoking areas away from onsite fire hazards would all reduce these impacts. MM HAZ-4, requiring preparation and implementation of an Evacuation Plan, and MM HAZ-5, requiring that design of the Lower Area provides direct access for emergency response vehicles to the Irish Hills Natural Reserve bordering the Project site to the west, would further reduce impacts. Despite these measures, Alternative 1 would continue to be located in an area highly susceptible to potential fire hazards, and Impact HAZ-1 would remain *significant and unavoidable*.

Impact HAZ-2, addressing accidental releases of hazardous materials, would remain the same as under the Project. The routine transport, use, or disposal of hazardous materials

would be unchanged. As under the Project, hazardous materials encountered during demolition or construction activities would be disposed of in compliance with all pertinent regulations for the handling of such waste, including requirements of the SLO County APCD and California Code of Regulations. Additionally, this alternative would not substantially increase the risk from hazardous materials to the public within the Project site or within the surrounding area. Minimal safety risks from the storage, handling, and use of hazardous materials in the Project site would be reduced through compliance with any applicable standards and regulations. Therefore, Impact HAZ-2 would continue to be *less than significant*.

Impact HAZ-3 related to airport hazards would be similar to the Project. Although portions of the Project site lie within Safety Sub-Areas S-1b and S-1c of the 2005 Airport Land Use Plan, the Project site falls outside of the Aviation Safety Areas according to criteria in the Caltrans Airport Land Use Planning Handbook (Johnson Aviation 2014). Accordingly, as under the Project, no substantial physical airport-related safety hazard is expected to occur. Therefore, aviation-related safety impacts to residents and commercial employees or patrons would be *less than significant*.

Cumulative hazards from wildfire would be exacerbated by additional construction and operation of urban uses within the City and region along the urban-wildland interface. Projects along the City's wildland-urban interface would introduce additional fire hazard-related risks from typical residential operations and increased human activity (e.g., smoking, introduction of ignition sources, landscape equipment) and would place additional people and structures at risk of injury or damage in the event of a wildfire. Further, the heightened potential for future fire hazards from the influence of climate change and warmer conditions, as discussed in Section 3.7.1.1, would contribute to the potential for a higher frequency, intensity, and size of fires that may occur in such areas. As under the Project, adherence to mitigation measures MM HAZ-1 through -5, as well as the California Fire Code, City Municipal Code, policies within the SE, and review of discretionary projects by the SLOFD would reduce impact severity. While these measures would reduce potential wildfire hazards, given the high potential for wildfire along the City's wildland-urban interface, the potential for cumulative development to exacerbate wildfire hazards would be similar to the Project and impacts would be considered *significant and unavoidable*.

Cumulative projects within the City and the Project vicinity would have the potential to expose future area residents, employees, and visitors to chemical hazards through

development of sites and structures that may be contaminated from either historic or ongoing uses. The severity of potential hazards for individual projects would depend upon the location, type, and size of development and the specific hazards associated with individual sites. Discretionary projects proposed in the City would be required to undergo individual environmental review, including review of potential impacts related to hazards and hazardous materials that are applicable to that particular development site and proposed use. Additionally, projects would also be subject to the local, state, and federal standards which require the safe removal of potentially hazardous building materials and the cleanup of contaminated properties, thus reducing the level of risk on a particular site. Because development standards or remediation requirements would be applied if hazards or hazardous materials posed a risk to safety, contribution to cumulative impacts associated with exposure to hazards or hazardous materials would be similar to those of the Project and would be considered *less than significant*.

### *Hydrology and Water Quality*

Impacts related to hydrology and water quality would be substantially similar to the Project due to similar types of development and similar realignment of Froom Creek paired with the proposed stormwater detention basin. Increases in impervious surfaces under this alternative would decrease as compared to the Project due to the reduction in developed area on the site (approximately 18 percent decrease), and continued compliance with applicable local, regional, state, and federal requirements would further reduce the potential for significant impacts.

Impact HYD-1 addressing construction impacts to water quality would be reduced as compared to the Project. Unlike the Project, no construction would occur in the Upper Terrace of Villaggio, substantially reducing the potential for spill of oil, gasoline, hydraulic fluids, and other contaminants into Drainages 1, 2, or 3. In addition, soil erosion impacts to the drainages within the Upper Terrace would be reduced compared to the Project. Grading under Alternative 1 would require approximately 94,000 cy less fill as compared to the Project. As under the Project, construction in the lower portion of the site and Madonna Froom Ranch would present a potential for polluted construction related surface runoff to flow into onsite wetlands and Froom Creek.

Discharge of pollutants from construction equipment, including accidental spillage of fuels and lubricants, could also occur. Implementation of MM HYD-1, MM HYD-2, and MM HYD-3, requiring stormwater permitting and management actions, would be implemented. As under the Project, these mitigation measures would reduce the potential for erosion and



construction runoff to flow downstream to San Luis Obispo Creek or to the Calle Joaquin wetlands, and potential impacts would remain *less than significant with mitigation*.

Impact HYD-2, addressing potential onsite flooding and erosion hazards, would be similar when compared to the Project since the proposed stormwater system for Alternative 1 would involve the same components. Froom Creek realignment would be similar to the design under the Project. Preliminary calculations prepared by the Applicant and peer-reviewed by the City's EIR consultant, indicate the stormwater management system would be capable of accommodating a 100-year storm event. Development under Alternative 1 would be clustered, so the acreage of impervious surfaces would be less severe when compared to the Project. Replacement of approximately 8.2 acres of residential development with open space in the Upper Terrace would decrease potential stormwater surface flows. Implementation of MM HYD-4 requiring creek bank and channel bottom stability and avoidance or reduction of further erosion would continue to apply, and impacts would be less than significant with mitigation.

Impact HYD-3, addressing water quality impacts to Froom Creek and San Luis Obispo Creek due to polluted urban runoff and sedimentation, would be the same as under the Project. While development of the site increases the possibility of runoff, similar to the Project inclusion of a comprehensive stormwater management system with approximately four stormwater retention and treatment areas onsite would reduce impacts. As under the Project, this alternative would be subject to the Central Coast Regional Water Quality Control Board's (RWQCB's) Post Construction Requirements and National Pollutant Discharge Elimination System discharge permits. Implementation of proposed BMP strategies of the FRSP would also reduce impacts from urban runoff. Further, upon compliance with the City's Storm Water Management Plan, Engineering Standards, General Plan, and City Municipal Code requirements, adverse effects to water quality from operation of this alternative would be reduced. Impacts would be similar to the Project and *less than significant*.

Impact HYD-4, involving impacts to groundwater, would be lessened compared to the Project. Unlike the Project, the Upper Terrace would remain undeveloped, allowing continued natural percolation and reduced opportunities for pollutants to be carried into adjacent waterways as a result of stormwater flows. The City no longer relies on local groundwater as of April 2015, and the San Luis Obispo Groundwater Basin is not in overdraft and recharges quickly following normal rainfall years. Additionally, as under the Project, implementation of BMPs would be required consistent with City and RWQCB

standards. Similar to the Project, groundwater resources would not be depleted or degraded, and groundwater recharge would not be impeded. Groundwater impacts would be similar to the Project and would be considered *less than significant*.

Cumulative impacts to water quality would be incrementally reduced compared to the Project, including potential contribution to cumulative trends of increased urban pollutant discharge to the San Luis Obispo Creek system. As under the Project, mitigation of these impacts would be required through compliance with water quality requirements and State Water Resources Control Board (SWRCB) regulations, and potentially significant cumulative impacts would therefore be *less than significant with mitigation*.

### *Land Use and Planning*

Under this alternative, the layout, acreage, and placement of residential and commercial development, as well as parkland and roadways, within the Project site would substantially differ from the Project. While the total number of residential units and square footage of commercial land uses would remain the same as the Project, Alternative 1 would be consistent with policies within the General Plan LUE that prohibit development above the 150-foot elevation line. This aspect of Alternative 1 would relocate residential development in upper elevations of Villaggio and Madonna Froom Ranch to lower elevations of the site and relocate the proposed trailhead park to the portion of Madonna Froom Ranch above the 150-foot elevation. Residential and commercial development would be tightly clustered within approximately 30 percent of the site (e.g., 36 acres), with over 60 acres of contiguous open space provided on the Upper Terrace and upper reaches of Madonna Froom Ranch within a public park. Overall, impacts identified within Section 3.8, *Land Use and Planning*, would be substantially less than under the Project.

Impact LU-1, regarding conflicts with City General Plan policies for visual, biological, and cultural resources and wildfire hazards, would be substantially reduced compared to the Project. Unlike the Project, urban development above the 150-foot elevation would not be permitted, consistent with the City General Plan. This alternative would be substantially more consistent with the General Plan LUE and COSE policies that protect sensitive biological, cultural, open space, and visual resources. These policies include LUE Policies 1.8.6, *Wildlife Habitats*, and 6.4.7, *Hillside Planning Areas*, and COSE Policies 7.3.1, *Protect Listed Species*, 7.3.2, *Protect Species of Local Concern*, and 9.2.1, *Views to and from public places, including scenic roadways*. However, development of 12 Villas in the southwest corner of Villaggio's Lower Area would continue to substantially impact onsite biological habitat connectivity between the Froom Creek corridor and grassland within the

Upper Terrace, and would be potentially inconsistent with COSE Policies, including 7.3.3, *Wildlife Habitat and Corridors*, and 7.7.7, *Preserve Ecotones*.

Full compliance with the General Plan LUE and COSE would protect sensitive biological, open space, and visual resources, and reduce potential fire hazards. Avoidance of development within the Upper Terrace would protect biological resources, including federal jurisdiction wetlands and 12 special status plant species. Required implementation of MM BIO-4 would result in relocation of residential uses in the southwest portion of Villaggio to maintain a buffer on the centerline of the confluence of Drainages 1, 2, and 3, and would reduce potential inconsistencies with General Plan policies designed to protect wildlife corridors and ecotones, as discussed above. Further, relocation of the proposed trailhead park to the existing quarry location in the northwest portion of the Project site and moving residential uses eastward would ensure consistency with General Plan LUE policies to protect the Froom Creek watershed and trailhead. By relocating residential structures in the northwestern portion of the Project site and Upper Terrace of Villaggio, the visual transition between the Irish Hills Natural Reserve and the Project site would be improved, substantially reducing visual impacts (refer to KVA-4 and -5, above). Removing urban development above the 150-foot elevation line would also greatly increase open space buffers between development in Madonna Froom Ranch and Villaggio, improving safety from potential wildfire hazards onsite. Additionally, implementation of MM BIO-1 through -7 and -10 through -12 and MM HAZ-1 through -5 would further reduce potential impacts to biological resources and wildfire hazards. In contrast with the Project, Alternative 1 would avoid the significant land use and planning impacts related to General Plan policy consistency by eliminating urban development above the 150-foot elevation line onsite.

However, the Project site also supports the historic Froom Ranch Dairy complex, including seven existing structures associated with the historic dairy and Froom family. These structures could constitute a potential historic district under the City's Historic Preservation Ordinance and the CRHR. As under the Project, retention and relocation of four structures (i.e., main residence, creamery, dairy barn, and granary) and demolition of three contributors to the potential Froom Ranch Dairy historic district (i.e., the shed, bunkhouse, and old barn) would impact historic resources. While implementation of MM CR-7 through -14 would reduce potential impacts, the permanent loss of the historic integrity and contributing structures of the potential historic district would result in *significant and unavoidable* impacts and potentially conflict with City policies for historic resource protection.

Impact LU-2, addressing potential inconsistencies with City setback requirements and the existing onsite agricultural easement, would be less than under the Project. Realignment of the open space and agricultural easement would support conservation of habitat and biological resources, particularly the protection of existing wetlands within this 1.6-acre portion east of Calle Joaquin, which is consistent with the easement's preservation intent. Further, because development would not be permitted within the Upper Terrace, Drainages 1, 2, and 3 would remain protected from the impacts of development. Therefore, impacts under this alternative would be less than under the Project and would be remain *less than significant*.

Significant cumulative land use and planning impacts could occur as the result of many planned and/or proposed residential developments in undeveloped open or agricultural lands along edges of the City. As under the Project, this alternative's incremental contributions to conversion of agricultural and rural land along the perimeter of the City to developed urban uses would result in loss of open space and habitat, increases in impervious surfaces, night lighting, noise, and traffic that accompany such development. However, as with the Project, development under this alternative would be generally consistent with adjacent development uses along LOVR and all pending/future projects would be required to comply with development standards and General Plan policies of the City, and potential impacts would be assessed and mitigated in accordance with CEQA and applicable City policies prior to approval. Design and implementation of mitigation measures under this alternative would ensure consistency with General Plan policies, design standards and Zoning Ordinance regulations, and cumulative impacts related to land use and planning would continue to be *less than significant*.

### *Noise*

Construction and operational noise impacts would be similar to the Project as overall residential and commercial development would be comparable in size and scale. Development of residential and commercial land uses would result in construction noise impacts. The location of those noise sources under Alternative 1 would be confined to the lower portion of the site and Madonna Froom Ranch, as well as the proposed stormwater management system. Operationally, this alternative would have a similar amount of traffic generation as the Project, resulting in minimal increases in mobile noise from increased vehicular traffic on area roads. As with the Project, noise sensitive residential uses would be developed adjacent to existing commercial uses that could exceed acceptable noise levels under City standards.

Impact NO-1, addressing construction noise, would be less severe when compared to the Project. Similar to the Project, short-term increases in noise from the use of heavy-duty construction equipment would exceed applicable standards in the City Noise Ordinance. Also, similar to the Project, noise impacts from grading and construction would exceed City and County standards for nearby sensitive receptors, including hotels along Calle Joaquin and recreational users within the Irish Hills Natural Reserve, but would be limited to a smaller footprint on the site away from natural areas in the Irish Hills and Mountainbrook Church. Unlike the Project, development would not include the Upper Terrace of the Villaggio, thereby reducing construction noise impacts to sensitive receptors within occupied units within the Lower Area, as well as recreational users along trails within the Irish Hills Natural Reserve. As under the Project, noise impacts to sensitive receptors would be minimized to the maximum extent feasible through compliance with the City's Noise Ordinance and implementation of MM NO-1, limiting construction activities during evenings, Sundays, or holidays, MM NO-2, requiring noise attenuation measures, and MM NO-3 ensuring neighbors are informed regarding allowed construction timelines and noise complaint procedures. Noise generated from construction of this alternative would be less severe when compared to the Project, and implementation of mitigation would ensure noise levels under this alternative would not exceed City noise thresholds periodically over the construction period. Residual impacts would continue to be considered *less than significant with mitigation*.

Impact NO-2, related to ground-borne vibration, would be similar to the Project, as short-term construction activities could expose people to excessive ground-borne vibration. Construction would follow a similar progression of development within the Project site and vibrations would be temporary and intermittent during the hours of construction. Because residential units would not be developed within the Upper Terrace of Villaggio, heavy construction equipment would not pass through occupied units in the lower area and potential impacts from construction-related vibration on this population would be less than under the Project. While Villaggio would be occupied during construction of Madonna From Ranch, vibration would be attenuated with the intervening distance and would be at an imperceptible level at the location of proximate sensitive receptors. Therefore, vibration impacts from construction under this alternative would be less severe when compared to the Project and would be *less than significant*.

Impact NO-3, considering exposure of future residents to noise from nearby roadways, would be similar to the Project, as residential units in Madonna From Ranch and the lower portions of the site would remain located in an area that exceeds City noise limits for

roadway noise. Maximum allowable noise exposure resulting from transportation sources for residences, hotels, and office buildings within the City is 60 decibel average (dBA) outdoor and 45 dBA within interior spaces (see Table 3.10-5 within Section 3.10, *Noise*). As under the Project, areas could be exposed to outdoor noise levels above 60 dBA. However, the Acoustics Assessment prepared for the Project site modeled the 60 dBA noise contour to be outside of these residential areas and estimates that noise levels for residential land uses would be approximately 45 to 57 dBA (Appendix I). Traffic generated under this alternative would increase ADT on LOVR by roughly the same amount as the Project, although these increases would be negligible compared to existing levels and would not result in a perceptible increase in noise levels. As under the Project, compliance with the California Building Standards Code requirements would reduce noise levels for outdoor activity areas and exterior living spaces do not exceed acceptable levels. Similar to the Project, this impact would be *less than significant*.

Impact NO-4, addressing noise impacts from commercial uses to the north, would be similar to the Project. Approximately the same number of residential units would be developed adjacent to these commercial uses as the Project, resulting in potential impacts from commercial deliveries and other associated activities that would exceed allowed noise levels for residential areas. Similar to the Project, required implementation of MM NO-4 would reduce anticipated noise levels through the use of noise reduction measures such as a planted earthen berm or sound wall along the site boundary. As under the Project, residual impacts would be considered *less than significant with mitigation*.

As under the Project, this alternative would contribute a marginal increase in stationary and mobile noise sources, and the cumulative impact of noise levels resulting from construction and operation of this alternative would remain *less than significant with mitigation*.

### *Population and Housing*

Population and housing impacts would be the same as under the Project, as Alternative 1 would facilitate similar levels of new residential development (578 units), and associated population increase (1,231 persons) as the Project. In addition, the composition of inclusionary affordable housing units offered by this alternative would be similar to the Project as required for consistency with City Inclusionary Housing Requirements and Specific Plan Area Expansion Area Inclusionary Housing Requirements.

Impact PH-1, addressing population growth, would be the same as under the Project. The increase in population would be well below projected population under the LUE by 2035. As under the Project, this alternative would not exceed the adopted annual City growth rate of one percent under General Plan Policy LU 1.11.2. and would be compliant with the intent of the City's growth management strategies relating to the annual average and overall increases in housing units and population. Impacts would therefore remain *less than significant*.

Impact PH-2, which addresses the City's jobs-housing balance, would be similar to the Project and would have beneficial impacts related to the City's jobs-to-housing balance and assist in achieving the target jobs-to-housing ratios of 1.5 to 1. The proposed construction of 174 new housing units would provide additional housing for the existing and growing labor force within a community that currently has a 1.6 to 1 jobs-to-housing ratio. Therefore, this impact would be *less than significant*.

Impact PH-3, which addresses construction of affordable housing within the City, would be similar to the Project. This alternative would adhere to the same requirements of the Specific Plan area and HE Policies as the Project, including the requirement to build a minimum of five percent low- and ten percent moderate-income affordable dwelling units. Because the same number of units, including low- and moderate-income affordable units, would be constructed as under the Project, impacts would remain *less than significant*.

Cumulative impacts would be similar to the Project. Cumulative development and associated growth in population and housing is anticipated in the General Plan LUE and would be consistent with City General Plan policies. This alternative, in combination with pending/future developments, would align with the City's plans for buildout as projected by the General Plan. This alternative would be consistent with the residential unit growth requirements specified by General Plan LUE Policy 1.11.2 and Table 3.11-17 within Section 3.11, Population and Housing, though there may be pressure to exceed the annual one percent rate allowed under General Plan LUE Policy 1.11.2. However, the contribution under this alternative would remain consistent with LUE and HE policies and would not result in significant cumulative contribution. Further, existing LUE policies requiring that the City manage its housing supply so that it does not exceed a growth rate of one percent per year, on average, would help to ensure population growth does not exceed planned growth or result in significant cumulative impacts associated with increases in population and housing within the City. Therefore, cumulative impacts would remain less than significant.

### *Public Services and Recreation*

Under Alternative 1, the quantity of residential units introduced to the Project site would be the same as the Project, potentially resulting in an estimated 1,231 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 Alternative 1 would be incrementally greater than the Project (an additional 0.4 acre), which would directly benefit new residents and generally comply with the City's parkland requirements, although mitigation for provision of additional parkland would be required to fully comply with applicable requirements.

Impact PS-1, relating to police services, would be similar to the Project, as development would not require or result in the provision of new or physically altered facilities. Development under Alternative 1 would result in the same number of residential units and square footage of commercial area as under the Project, and therefore place a similar demand on police services. As under the Project, the anticipated population increase may require the hiring of an additional police officer to maintain the current ratio of 1.17 police officers per 1,000 residents. However, this increase would be funded through property, sales, and transient occupancy taxes throughout the City, including those resulting from Alternative 1, and would not necessitate police station expansion or construction beyond that already approved by the City. As under the Project, this alternative would be required to implement measures to decrease demand for police protection, including consistency with SLOPD's Crime Prevention Through Environmental Design Principles. Accordingly, impacts to police protection services would remain *less than significant*.

Impact PS-2, relating to fire protection services, would be similar to the Project. Population increases would be the same as under the Project, including estimated increases in seniors. Development would continue to be subject to SLOFD standards and the California Fire Code and would be located within the four-minute safe response (travel) time required by the SE of the City General Plan. While the number of firefighters required under Alternative 1 would increase, Alternative 1 would not require construction of new firefighting facilities that would adversely impact the physical environment and Impact PS-2 would continue to be *less than significant*.

Impact PS-3, relating to public schools, would be similar to the Project, as 404 of the 578 proposed residential units would be for seniors who are not expected to generate school-aged populations. As under the Project, the remaining 174 multi-family units would be anticipated to generate approximately 37 school-age children. Schools that are closest to



the Project site have the capacity to accommodate the estimated increase in the student population. As under the Project, required payment of development fees would offset potential impacts of increased enrollment on school facilities. Given school district-wide capacity and the payment of impact fees for school facilities, anticipated impacts to school facilities would be similar to the Project and would be *less than significant*.

Impact PS-4, relating to parkland availability, would be slightly less significant than the Project. Approximately 12.31 acres of parkland would be required to meet the City's standard of 10 acres of parkland per 1,000 residents, as described in Parks and Recreation Element (PRE) Policy 3.13.1. Alternative 1 would include 3.3 acres of public parkland within the Project site, which is 0.4 acre greater than under the proposed Project and 9.01 acres less than required under the City General Plan. As under the Project, implementation of MM PS-1 and MM PS-2, would require additional parkland dedication or payment of in-lieu fees to satisfy City requirements for 10 acres of parkland per 1,000 residents, including five acres of neighborhood parks. As under the Project, implementation of these measures would result in impacts to park and recreation resources that would be considered *less than significant with mitigation*.

Alternative 1, in conjunction with approved, pending, or proposed development projects in the City, proposed land use changes under the General Plan LUE, along with associated population growth, would incrementally increase overall demand for public services, including fire protection, police protection, schools, and parks. However, as under the Project, projects would be required to address potential contribution to cumulative impacts through fair share payments, as well as other standard mitigation measures. Similar to the Project, Alternative 1 would not result in cumulatively considerable deterioration of existing public facilities or service levels and cumulative impacts would be *less than significant with mitigation*.

#### *Transportation and Traffic*

Impacts related to transportation and traffic would not substantially vary in comparison to the Project due to identical levels of residential and commercial development and is anticipated to also generate 2,700 daily vehicle trips. Additionally, emergency access points will be altered as compared to the Project, lessening potential evacuation impacts.

Alternative 1 would include similar road and transportation improvements to the Project:

- 1) A signalized intersection with LOVR that would provide four-way pedestrian crosswalks and access to a new two-lane road (Collector “A”) that would serve as the primary access to the Specific Plan area;
- 2) Widening of LOVR along a portion of the Project site’s frontage;
- 3) Proposed internal roadway network consisting of public and private roads;
- 4) Proposed bicycle and pedestrian facilities throughout the Specific Plan area;
- 5) Parking facilities to accommodate residents, employees, and visitors within the Specific Plan area; and
- 6) A new bus stop that would be integrated into the regional public transportation system.

Emergency access roads from Mountainbrook Church would not be included in this Alternative. Emergency access roads would instead be provided via three different connections: 1) from the Irish Hills Plaza into Madonna Froom Ranch; 2) from LOVR to Villaggio; and 3) from Calle Joaquin to Villaggio through the proposed stormwater detention basin area. Following incorporation of these roadway and transportation improvements and mitigation measures discussed below, residual impacts for Alternative 1 would be similar to those identified in the City-prepared Traffic Impact Study (TIS) findings for Existing plus Project Conditions (see Tables 3.13-13 through 3.13-16 within Section 3.13, *Transportation and Traffic*; see also Appendix J).

Impact TRANS-1, associated with construction traffic impacts, would be less severe when compared to those associated with the Project because removal of development in the Upper Terrace would eliminate the need for construction vehicles to travel along Calle Joaquin and within proposed local roads within the Project site. Construction timing under Alternative 1 would change to avoid overlap between occupancy of Villaggio and construction activities in the Upper Terrace, as proposed by the Project. Alternative 1 would result in construction traffic being separated from occupied portions of the site in Villaggio and Madonna Froom Ranch and would shorten the time in which construction vehicles would interfere with regular roadway traffic. As under the Project, this Alternative would implement MM TRANS-1 requiring preparation of a Construction Transportation Management Plan for all phases of development, to be reviewed and approved by the City. Given substantial reductions in development footprint and implementation of required mitigation measures, this impact would be incrementally less severe when compared to the Project and would be *less than significant with mitigation*.

Impact TRANS-2, regarding exacerbation of queuing and peak hour traffic for automobiles and poor levels of service for pedestrians and bicycle modes of transportation under Existing plus Alternative 1 conditions, would be similar to the Project. The anticipated residential population of Alternative 1 is the same as the Project and roadway intersections impacted by the Project would continue to be impacted by Alternative 1. Although internal roadways would be lessened as a result of removal of residential uses in the Upper Terrace, internal traffic would continue to be potentially significant at occupation of Madonna Froom Ranch, although MM TRANS-11 requiring use of traffic calming measures on Local Street "A" would reduce this impact to less than significant. Although required implementation of MM TRANS-2 through -5 and MM TRANS-7 through -11 would reduce other impacts under Existing plus Alternative 1 conditions to less than significant, MM TRANS-6 requiring payment of fair share costs for the completion of the Prado Road Overpass/Interchange project would not mitigate potential impacts until this infrastructure project is complete. Therefore, similar to the Project, if the Prado Road Overpass/Interchange project is not in place by occupancy of Alternative 1, this impact would remain *significant and unavoidable*.

Impact TRANS-3, which addresses exacerbation of existing queuing and peak hour traffic for automobiles and poor levels of service for pedestrians and bicyclists under Near-Term plus Alternative 1 conditions, would be similar to the Project. As discussed above, Alternative 1 would generate similar population increases and associated traffic as the Project. Although required implementation of MM TRANS-2, -5, -8, -9, -12, -13, and -15 through -18 would reduce impacts under Near-Term plus Alternative 1, completion of MM TRANS-6 and MM TRANS-14 require completion of the Prado Road Overpass/Interchange project, which cannot be ensured by this alternative. Therefore, if the Prado Road Overpass/Interchange project is not in place by occupancy of Alternative 1, this impact would remain *significant and unavoidable*.

Impact TRANS-4, addressing inadequate emergency access and evacuations in areas of high and very high fire hazard, would be less severe when compared to the Project, as additional emergency evacuation options would be provided under Alternative 1 and development would be reduced to lower risk areas of the site. Similar to the Project, this alternative would continue to provide an emergency access route between Madonna Froom Ranch and Irish Hills Plaza. Unlike the Project, Alternative 1 would not provide an emergency access route through the Mountainbrook Church private road and would instead provide one emergency access route along the proposed stormwater basin and another across the realigned Froom Creek channel to connect to LOVR, thereby improving options

for emergency access and evacuation. The access route adjacent to the stormwater basin would allow evacuees located within the southwestern portion of Villaggio to evacuate without further exacerbating potential congestion along LOVR, as well as provide additional ingress and egress points for emergency responders. Additionally, Alternative 1 would require MM TRANS-19, inclusion of an emergency access point from the Lower Area to the existing dirt access road that connects to the utility power line structures at the top of the ridgelines, and MM TRANS-22, requiring provision of emergency respondent access to Project site perimeters, which would increase emergency access to the site and reduce potential impacts to *less than significant with mitigation*.

Impact TRANS-5, regarding pedestrian and bicycle circulation safety issues, would be similar to the Project, as anticipated generation of internal roadway trips would be the same. MM TRANS-24 would continue to be required, ensuring Alternative 1 would include Project concept designs and design guidance published by the National Association of City Transportation Officials and the Federal Highway Administration, including installation of American Disabilities Act-compliant sidewalks, Lead Pedestrian Intervals and pedestrian refuges at the LOVR/Auto Park Way intersection, and Class IV bikeways along LOVR approaching/departing this intersection. Implementation of this mitigation measure would ensure residual impacts to onsite circulation for pedestrians, and bicyclists would be *less than significant with mitigation*.

Impact TRANS-6 regarding Cumulative plus Project conditions, would be similar when compared to the Project. As under the Project, potentially significant impacts could occur to 14 separate intersections and roadway segments due to increased automobile, pedestrian, and bicycle traffic under Cumulative plus Project conditions (see Table 3.13-16 in Section 3.13, *Transportation and Traffic*). However, required implementation of MM TRANS-25 through -30, as well as MM TRANS-8, -9, and -13, would reduce cumulative impacts to *less than significant with mitigation*.

### *Utilities and Energy Conservation*

Under Alternative 1, similar activities involving installation of public utilities and associated trenching would occur within a smaller area of development to support residential and commercial development within the lower portions of the site. New residential development (578 units) and associated population increase (1,231 persons) would be similar to the Project. However, 130 units of medium-high density R-3 units would be replaced with 130 high density R-4 units. This alternate range of unit types would not change the demand for utilities and service systems except for solid waste. Based on

the below analysis, transitioning to multi-family units with incrementally higher density units would generally result in a decrease of solid waste production compared to the Project.

Impact UT-1, regarding potential environmental impacts resulting from expansion of utility infrastructure, would be incrementally less adverse when compared to the Project. Impacts would be less adverse when compared to the Project due to reductions in building footprints and elimination of development in areas above the 150-foot elevation. Anticipated levels of service to be provided would be similar as under the Project, as would associated infrastructure requirements. Implementation of Alternative 1 would include MM UT-1, ensuring Project utilities are engineered consistent with City standards. Similar to the Project, residual impacts would continue to be less than significant with mitigation.

Impact UT-2, regarding demand increases to the City's potable water supply, would remain the same as under the Project. Residential and commercial development under Alternative 1 would be similar to the Project, and all landscaping would continue to be irrigated using recycled water and augmented with a groundwater well. Although the number of residential units in areas designated as R-3 and R-4 would change incrementally compared to the Project, units within these land use designations are similar and are anticipated to require the same level of potable and recycled water. As under the Project, demand projections indicate sufficient available supply of City potable and recycled water and impacts would continue to be *less than significant*.

Impact UT-3, regarding demand for wastewater collection facilities, would be the same as under the Project. Alternative 1 would result in construction of the same number of residential units and the same amount of commercial development and therefore would not result in greater demand for the City's available wastewater services as compared to the Project. As under the Project, the Applicant would comply with City standards, including fused sewer lines and would not significantly contribute to existing exceedance in wet-weather capacity of City facilities to process and treat wastewater; however, the City notes that the Laguna lift station currently experiences capacity issues (Personal communication with Jennifer Metz, City of San Luis Obispo Utilities Department, May 2019). Implementation of Alternative 1 would therefore contribute to, or exacerbate existing issues associated with capacity of the City's wastewater collection and conveyance system. Similar to the Project, implementation of MM UT-2 and payment of development impact fees would also be required to offset any impacts to the City's wastewater management

capacity. Impacts related to wastewater services would therefore continue to be *less than significant with mitigation*.

Impact UT-4, regarding generation of solid waste, would be less severe when compared to the Project. Alternative 1 would include development of 7.4 acres within the Madonna Froom Ranch with high density residential uses, as opposed to 6.3 acres of medium density residential and 1.8 acres of high density residential as proposed under the Project (see Table 5-1). Denser residential land uses typically generate lower levels of solid waste per unit; therefore, the Madonna Froom Ranch development under Alternative 1 would generate approximately 923.9 lbs/day from residential uses as compared to 1,351.6 lbs/day under the Project (see Table 5-13). This difference in solid waste generation equates to a decrease in 427.7 lbs/day or 76 tons/year, or an approximate 31.6 percent reduction. Based on the daily solid waste projections and similar to the Project, Alternative 1 would contribute approximately 0.3 percent of the potential daily waste capacity of Cold Canyon Landfill. The waste produced 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 would remain *less than significant*.

**Table 5-13. Estimated Solid Waste Production Under Alternative 1**

Waste Generation Source	Proposed Uses	Quantity (# of Units)	Waste Generation Factor	Waste Generation (lbs/day)
<b>VILLAGGIO</b>				
Multi-family	Independent Living Units	366 units	8.6 lbs/day/unit	3,147.6
Nursing/Retirement Home	Assisted Living Units	38 units	5 lbs/person/day <sup>1</sup>	190
Hospital	Health Care Units	51 beds	16 lbs/bed/day <sup>1</sup>	816
Office	Administration Building and Ancillary Uses	85,078 sf	0.006 lbs/sf/day	510.5
Commercial Sector (Commercial Retail)	Ancillary Uses	84,078 sf	0.046 lbs/sf/day	3,867.6
<b>MADONNA FROOM RANCH</b>				
Multi-family	High Density Residential	174 units	5.31 lbs/day/unit <sup>4</sup>	923.9
Service Sector (Other Services)	Hotel with Restaurant	70,000 sf	3.12 lbs/100 sf/day	2,184
Commercial Sector (Commercial Retail)	Other Commercial	30,000 sf	0.046 lbs/sf/day	1,380
<b>Estimated Total Waste Generation (lbs per day)</b>			<b>13,019.6</b>	
<b>Estimated Total Waste Generation (lbs per year)</b>			<b>4,755,423.5</b>	
<b>Estimated Total Waste Generation (tons per day)</b>			<b>6.5</b>	
<b>Estimated Total Waste Generation (tons per year)</b>			<b>2377.7</b>	

Impact UT-5, regarding available energy resources and consumption rates, would remain the same as under the Project. Estimated fuel consumption for construction would be similar to estimated fuel consumption for construction under the Project. Consumption of electricity, natural gas, and gasoline during operation under Alternative 1 would also be the same as under the Project. As under the Project, compliance with federal, state, and local regulations pertaining to renewable energy, improved energy efficiency, and conservation in both construction and operation would be required. Further, though not required to reduce impacts of this alternative, a number of mitigation measures identified to reduce Project impacts to various resources would have the secondary effect of reducing Project energy demands. The demand for energy under Alternative 1 is generally lower than County and state averages, and potential direct impacts to energy resources and conservation are considered *less than significant*.

Implementation of Alternative 1 and other proposed or current projects listed in Table 3.0-1 within Section 3.0.3, *Cumulative Impact Analysis*, would increase the cumulative demand on utilities; however, these projects would be required to comply with standards for

adequate utilities set forth in the City General Plan, would be subject to City planning and review requirements, and would be required to pay development impact fees to offset any impacts from utility infrastructure needs and service capacities. As such, and as indicated by the LUCE Update EIR, no significant or adverse cumulative effects are anticipated related to the supply of water, waste water, solid waste, or energy utilities. Therefore, cumulative impacts to utilities would be *less than significant with mitigation*.

### *Mineral Resources*

Impacts related to mineral resources would not vary from the Project. As under the Project, closure of the quarry under this alternative would nominally lower available acreage for red rock extraction, and Impact MN-1 would remain *less than significant*. Additionally, cumulative impacts to mineral resources or mineral resource recovery sites would continue to be considered *less than significant* as the City does not allow mineral resource extraction and there are no other proximate active mines identified for future annexation into the City. Therefore, there are no projects within the City that are expected to further reduce currently available supplies.

#### 5.4.2.3 Alternative 2 – Residential Development Project Alternative

Similar to Alternative 1, Alternative 2 would include a major reconfiguration of the proposed land use plan and redesign of key Project elements, including substantially increased clustering of development within Madonna Froom Ranch and the Lower Area of Villaggio to reduce environmental impacts identified in the EIR. Alternative 2 would continue to provide a Life Plan Community and new multi-family neighborhood; however, unlike the Project and Alternative 1, Alternative 2 would eliminate commercial uses on site. Instead, Alternative 2 would support 178 multi-family residential units (four more than proposed under the Project or Alternative 1), 404 senior independent living units, 51 beds in residential health care facilities, and 3.3 acres of public parkland. Four primary features of this alternative are intended to substantially reduce identified Project impacts:

- 1) No commercial development (e.g., hotel, retail) would be included in the Madonna-Froom Ranch portion of this alternative; commercial uses proposed under the Project in Madonna Froom Ranch would be replaced with R-4-SP High Density Residential Uses. Resident-serving commercial uses would continue to be developed within Villaggio to serve Villaggio residents and would be similar to those proposed under the Project (e.g., restaurants, theater);



- 2) Consistent with the General Plan LUE, all development would be confined to areas below the 150-foot elevation, removing all development from the Upper Terrace and restricting new development to roughly 30 percent of the site within Villaggio's Lower Area and Madonna Froom Ranch;
- 3) Development of buildings within the Lower Area would be reconfigured, and some building heights and sizes increased to accommodate the same capacity for development as the Project of 404 units, 51 beds in health care units, and more than 160,000 sf of administrative and support facilities;
- 4) As with Alternative 1, emergency access would be provided via three different connections: 1) from Irish Hills Plaza into Madonna Froom Ranch; 2) from LOVR to Villaggio; and 3) from Calle Joaquin to Villaggio through the proposed stormwater detention basin area on the Mountain Brook Church easement.

Required discretionary actions would be similar to the proposed Project, while the construction phasing plan would be similar to Alternative 1 (see also Table 5-6).

As under the Project, this alternative would realign Froom Creek to improve site drainage and make space for residential development, along with additional drainage improvements as proposed under the Project (refer to Chapter 2, *Project Description*).

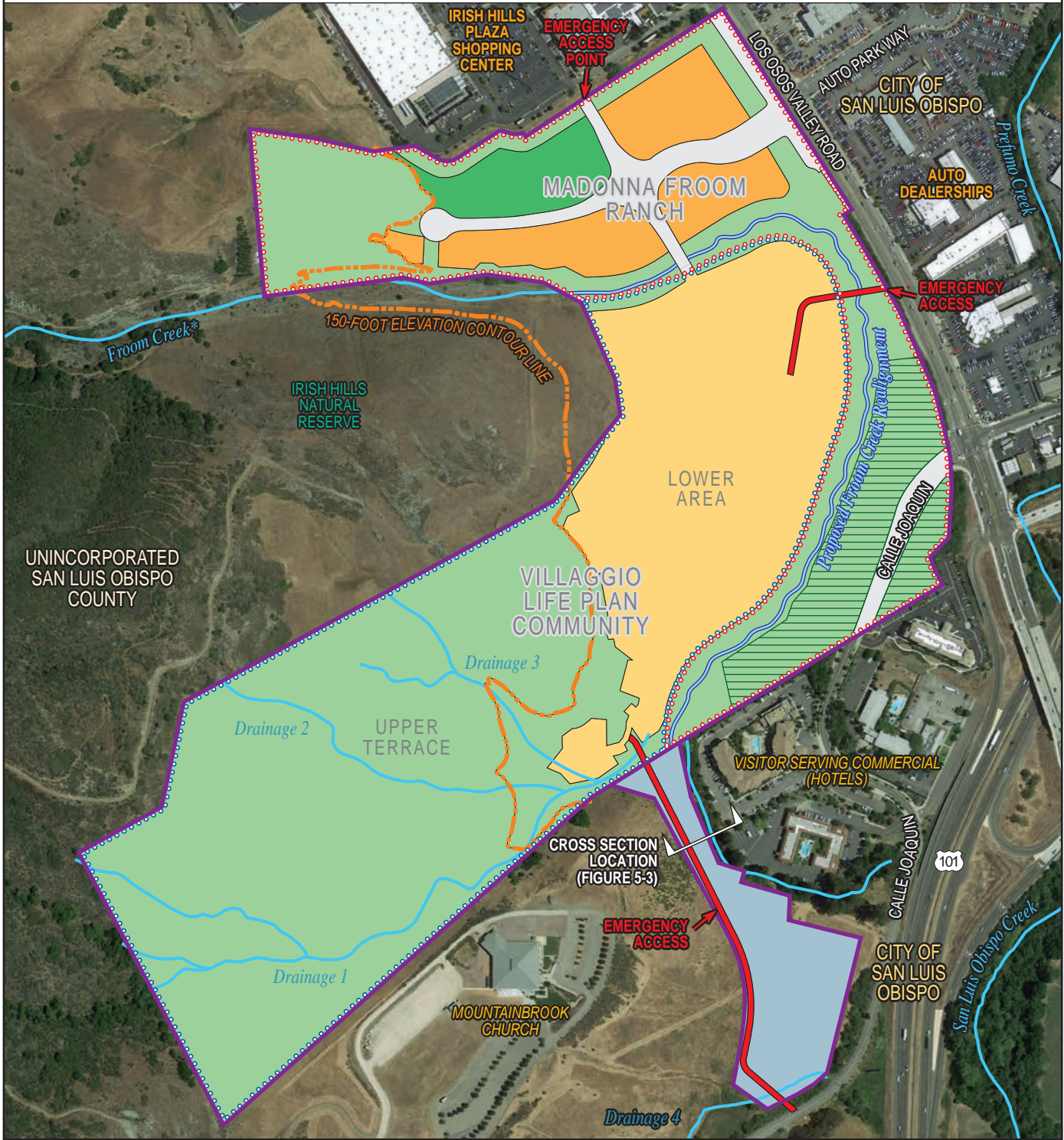
#### Land Use Plan and Site Design

Alternative 2 would increase clustering of development compared to the Project, including limiting residential and commercial land uses to areas of the site below the 150-foot elevation (see Figure 5-4). As compared to the Project, overall developed area would decrease by 8.2 acres and more than 6.1 additional acres of the Upper Terrace would remain as contiguous open space, substantially reducing direct and indirect habitat disturbance. The quarry on Madonna Froom Ranch adjacent to the Irish Hills Natural Reserve would also become open space as a new trailhead park under this alternative. Alternative 2 would allow for the development of a total of up to 582 residential units within medium-high and high density residential zones, including 178 multi-family units, 404 independent and assisted senior villas and apartments, and 51 beds in residential health care facilities, which is four more multi-family units than the Project. However, no commercial space would be provided in Madonna Froom Ranch (Table 5-14), which would reduce development compared to the Project by 100,000 sf. More than 160,000 sf of administrative and ancillary buildings would continue to be provided within Villaggio.

**LEGEND**

Project Site	Public Site Access Roadways: 3.7 acres	C/OS-SP – Conservation/ Open Space: 70.7 acres	R-3-SP – Medium-High Density Residential: 23.4 acres
<b>Proposed Specific Plan Land Use</b>	Easement for Relocated Stormwater Basin: 7.1 acres	PF-SP – Public Facilities: 3.0 acres	R-4-SP – High Density Residential: 7.3 acres
Villaggio (Private)	Reconfigured Open Space and Agricultural Conservation Easement	*Notes: Roadways within Villaggio are private and are included as part of the medium high density residential land use. Froom Creek would be realigned.	
Madonna Froom Ranch		<b>SCALE IN FEET</b> 0 500	

Aerial Source: Google 2018.



**Table 5-14. Summary of Alternative 2 Zoning and Land Uses**

Proposed Zones	Acreage	Housing Units/ sf
<b>VILLAGGIO</b>		
<b>R-3-SP Medium-High Density Residential</b>	<b>23.5</b>	<b>404 units/51 beds</b>
<i>Independent Living Units</i>		<i>366 units</i>
<i>Assisted Living Units</i>		<i>38 units</i>
<i>Health Care Units (Skilled Nursing &amp; Memory Care)</i>		<i>51 beds</i>
<i>Health Care Administration Building</i>		<i>85,670 sf</i>
<i>Ancillary Uses (wellness center, restaurants, theater, etc.)</i>		<i>76,509 sf</i>
<b>MADONNA FROMM RANCH</b>		
<b>R-4-SP High Density Residential</b>	<b>7.4</b>	<b>178 multi-family units</b>
<b>PF-SP Public Facilities</b>	<b>3.2</b>	<b>--</b>
<b>ADDITIONAL USES</b>		
<b>C/OS-SP Conservation/ Open Space</b>	<b>70.1</b>	<b>--</b>
<i>Designated Open Space</i>	<i>62.9</i>	<i>--</i>
<i>Reconfigured Agricultural Easement</i>	<i>7.1</i>	<i>--</i>
<b>Roadways</b>	<b>5.6</b>	<b>--</b>
<b>TOTAL</b>	<b>109.7</b>	<b>582 units/51 beds<sup>1</sup></b>

<sup>1</sup> Total exceeds Maximum 350 units as allowed in Section 8.1.5 of the General Plan LUE due to transition of allowed commercial land uses to residential land uses. This total assumes all units planned within residential land uses.

Alternative 2 would continue to provide a Life Plan Community within 23.4 acres designated as R-3-SP in Lower Villaggio, with additional apartment units provided by expanded and taller buildings in the central area of Lower Villaggio, similar to Alternative 1. Madonna Fromm Ranch would continue to provide multi-family housing within 7.4 acres of R-4-SP, with a density of 24 units per acre. A majority of these multi-family homes would be relocated eastward away from sensitive habitats and high fire hazards from the Irish Hills Natural Reserve and would replace commercial uses proposed under the Project.

A trailhead park would be provided within 3.3 acres of Public Facilities (PF-SP) designated area in the same location as under the Project. Areas proposed for Medium-High Density Residential uses under the Project within the existing quarry above the 150-foot elevation contour line adjacent to the Irish Hills Natural Reserve would be set aside as open space. These changes would ensure the land use plan better aligns with the policies of the City General Plan regarding development above the 150-foot elevation contour. The land use plan for Alternative 2 would reserve over 63 percent of the site (70.1 acres) in C/OS-SP, including preservation of almost 50 acres of contiguous open space on the Upper Terrace above the 150-foot elevation.

Froom Creek would be realigned and restored similar to the Project and stormwater management would be provided similar to the Project (see Section 2.5.4, *Stormwater Management System and Froom Creek Realignment*). Since Alternative 2 would not

involve development above 150-foot elevation, this alternative would not require a General Plan amendment to address this policy inconsistency associated with the Project. Grading, retention walls, and fencing plans would be similar to Alternative 1.

### Circulation and Site Access

Similar to the Project, circulation under Alternative 2 would entail provision of public roadways within Madonna Froom Ranch (Collectors A and B) and private local roadways in Villaggio. However, because all development would be restricted to below the 150-foot elevation contour, the road system would be substantially reduced in length compared to the Project, particularly local private roads. Emergency access via Mountainbrook Church would not be part of this alternative. Similar to the Project, Alternative 2 would have a primary entrance from LOVR at Auto Park Way. This public roadway would lead to the trailhead park, Madonna Froom Ranch neighborhoods, and the private gated entrance to Villaggio. Major components of the circulation system proposed under Alternative 2 are similar to the Project and are summarized below (see also Section 2.0, *Project Description*, for more details):

1. A signalized intersection with LOVR that would provide four-way pedestrian crosswalks and access to a new two-lane road (Collector “A”) that would serve as the primary access to the Specific Plan area;
2. Widening of LOVR along a portion of the Project site’s frontage;
3. Internal roadway network consisting of public and private roads;
4. Bicycle and pedestrian facilities throughout the Specific Plan area;
5. Parking facilities to accommodate residents, employees, and visitors within the Specific Plan area;
6. A new bus stop that would be integrated into the regional public transportation system; and
7. Three separate emergency access points would be provided, similar to Alternative 1 (see Figure 5-4).

### Proposed Housing and Population

Population and housing under Alternative 2 would be similar to the Project; allocation of units between different allowable densities and product types (e.g., Life Plan Community, multi-family units) would remain similar. Alternative 2 would alter the land use plan and incrementally adjust dwelling unit allocation, replacing 130 R-3-SP units in Madonna Froom Ranch with 134 R-4-SP units to allow for building clustering and greater densities (see Table 5-15).



Similar to the Project, proposed housing components of Alternative 2 would include a mix of single-family or duplex units in Villaggio and higher density multi-family condominiums and apartments in both Madonna Froom Ranch and Villaggio. Residential uses would have a similar mix of housing densities and average lot sizes as proposed for the Project, with dispersed single-story Villas, two story Garden Terraces, and up to 4-story buildings supporting Piazza Apartments and Community Village Apartment suites. Exact unit layout and design is not currently known

**Table 5-15. Summary and Comparison of Housing and Population**

Residential Housing Type	Alternative 2		Project	
	Alternative 2 Proposed Units	Estimated Population <sup>1</sup>	Project Proposed Units	Estimated Population <sup>1</sup>
R-3-SP - Villaggio	404 units/51 beds	976	404 units/51 beds	976
R-3-SP – Madonna Froom Ranch <sup>2</sup>	-	-	130 units	298
R-4-SP -Madonna Froom Ranch <sup>2</sup>	178 units	408	44 units	101
<b>TOTAL</b>	<b>578 units/51 beds</b>	<b>1,384<sup>3</sup></b>	<b>578 units/51 beds</b>	<b>1,375<sup>3</sup></b>

<sup>1</sup>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).  
<sup>2</sup>Per the City’s zoning ordinance, R-3 and R-4 units are expressed as density units. The number of actual dwelling units in the R-3 and R-4 zone may vary depending on the number of bedrooms.  
<sup>3</sup>Differences in estimated populations are a result of rounding inaccuracies and estimated populations are assumed to be the same.

Analysis –Alternative 2 (Residential Development Project Alternative)

Impacts under this alternative would be considerably less than that of the Project. Primary changes would consist of substantially increased clustering, improved protection of open space, and removal of all commercial uses. However, four additional residential units would be constructed in Madonna Froom Ranch under this alternative. Froom Creek would continue to be realigned under this Project, resulting in continued potential adverse and beneficial impacts. Avoidance of development above the 150-foot elevation line would substantially reduce potential impacts relating to aesthetics, biological resources, and wildfire hazards as compared to the Project.

*Aesthetics and Visual Resources*

Since development would not occur above the 150-foot elevation, within the Villaggio Upper Terrace or Madonna Froom Ranch quarry, impacts to scenic resources would be substantially decreased under this alternative. Avoiding development above the 150-foot elevation line would protect existing onsite visual resources including natural habitats and

serpentine rock outcroppings and would ensure a more gradual transition from rural land uses within the Irish Hills Natural Reserve to the urban land uses proposed under Alternative 2. While inclusion of taller structures within Villaggio could incrementally increase visibility of these buildings, substantially increased open space protection would reduce overall impacts to key views. Impacts to key views would be similar to the Project and Alternative 1. Implementation of mitigation measures as under the Project would require vegetative screens for buildings and associated infrastructure and would ensure potential impacts to aesthetic character would be mitigated to less than significant. Impacts related to nighttime lighting and glare would also be reduced as a result of reduced building construction. Therefore, impacts from Alternative 2 would be *less than significant with mitigation*.

### *Agricultural Resources*

Because the area impacted by development under this alternative is substantially less severe when compared to the Project, including avoidance of development within the Villaggio Upper Terrace and the existing quarry area, impacts to agricultural resources would be reduced. Further, this alternative would not result in the loss of Important Farmland. Impacts would therefore remain *less than significant*.

### *Air Quality and GHG Emissions*

Under Alternative 2, vehicle trip generation would be slightly reduced due to removal of commercial development from Madonna Froom Ranch, decreasing potential air quality and GHG emission impacts compared to the Project. Elimination of development above 150-foot elevation would substantially reduce grading needs for this alternative and would limit use of heavy construction equipment and associated emissions. Although residential units would be approximately the same as under the Project, this alternative would greatly decrease onsite commercial development, substantially reducing vehicle trips and GHGs and other air pollutant emissions associated with operations of commercial development. Additionally, the Project would continue to be required to implement mitigation measures to further reduce potential impacts to air quality. Despite substantial reductions as compared to the Project, impacts to air quality from implementation of this alternative remain significant due to inability to feasibly predict reductions in long-term operational (particularly mobile-source) emissions from required mitigation. Additionally, as a result of exceedance of population growth projections from the 2001 Clean Air Plan, the alternative would continue to be inconsistent with the 2001 Clean Air Plan, resulting in *significant and unavoidable* impacts.

### *Biological Resources*

Impacts to biological resources under Alternative 2 would be substantially reduced as compared to the Project and would be similar to Alternative 1. This alternative would not include residential development (Villaggio or Madonna Froom Ranch) above the 150-foot elevation line and would substantially reduce the building footprint and required onsite construction and grading within areas supporting sensitive natural habitats, thereby greatly reducing potential impacts to sensitive habitats and species onsite. This alternative would completely remove development within the Upper Terrace and impacts to sensitive species, drainages, and onsite wetlands within this area would be substantially avoided and/or reduced. Alternative 2 would reserve the existing quarry area as open space, which may support enhanced biological productivity over time in this currently degraded area adjacent to Froom Creek. Secondary impacts of fire clearance on native habitats would also be greatly reduced as the urban-wildland interface would be decreased by approximately 50 percent due to building clustering and removal of development above the 150-foot elevation line. However, Froom Creek would continue to be realigned and restored under this alternative and major clearing of riparian vegetation along LOVR ditch would continue, which could result in potential impacts to sensitive riparian habitats and species. Additionally, residential units in the southwestern area of Lower Villaggio developed under this alternative would continue to impact habitat connectivity between Froom Creek and grassland within the Upper Terrace, as well as impacts to sensitive riparian and wetland species at the confluence of Drainages 1, 2, and 3. Implementation of mitigation measures described under Section 3.4, *Biological Resources*, as well as MM BIO-Alt. 1 would substantially reduce potential impacts to sensitive and protected species, onsite natural habitats, and ecotone connectivity. However, potentially impacts to the Calle Joaquin wetlands would continue to occur as a result of creek realignment and LOVR drainage frontage improvements. Therefore, impacts would remain *significant and unavoidable*.

### *Cultural and Tribal Cultural Resources*

Impacts to cultural and tribal cultural resources under this alternative would be reduced, as avoidance of development within the Upper Terrace area of the Villaggio would decrease potential for impacts to known or potential archaeological sites. Site preparation and grading would still occur within areas containing sensitive cultural resources with potential for associated impacts, though required implementation of mitigation measures would reduce potential impacts during operation and construction of this alternative. Although appropriate mitigation measures would be required, relocation of dairy structures within

Froom Ranch would continue to have *significant and unavoidable* impacts on potentially significant historic resources. Overall impacts would be similar but slightly reduced as compared to the Project.

### *Geology and Soils*

Under this alternative, impacts related to geology and soils would be similar to the Project due to similar construction activities and geologic hazards onsite. As under the Project, design and construction of proposed land uses under this alternative would be subject to the requirements and regulations of the CBC and the City Municipal Code to ensure structural integrity in seismically active areas. By locating development outside of fault setbacks and implementing the most current regulatory standards for structural design, impacts of structural failure and risks to life and property due to seismic shaking, seismic-related ground failure, and soil constraints or hazards under this alternative would be the same as compared to the Project, and potential impacts would remain *less than significant*.

### *Hazards, Hazardous Materials, and Wildfire*

Under this alternative, impacts related to fire hazards, hazardous materials, and airport operations would be less than under the Project because of reduced construction activities due to substantial development clustering and smaller building footprints. Avoidance of development above the 150-foot elevation line within the Villaggio Upper Terrace and the northwestern portion of Madonna Froom Ranch would reduce urban-wildland interface by approximately 50 percent, reducing defensible space requirements and increasing the distance between proposed residential units and wildfires originating from western upland areas with very high fire hazard potential. Additionally, similar to the Project, this alternative would also be required to implement required mitigation measures that would decrease likelihood of wildfires, improve fire response evacuation, and ensure firefighters can attack fires encroaching on the Project site from the Irish Hills Natural Reserve. Potential impacts from hazardous materials and aircraft 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 be similar to the Project, and no new hazards due to use of hazardous materials or exposure to airport safety hazards would result from this alternative. However, as under the Project, Alternative 2 would be located in an area highly susceptible to potential fire hazards and impacts would remain *significant and unavoidable*.



### *Hydrology and Water Quality*

Under this alternative, impacts related to hydrology and water quality would not substantially vary from the Project due to similar drainage improvements, including realignment and restoration of Froom Creek and installation of a new stormwater detention basin, as well as onsite retention features for water treatment. Development would be substantially more clustered than the Project and areas of impervious surfaces would decrease under this alternative (approximate 62.1 percent reduction compared to the Project). Further, this alternative would better retain natural watershed processes, particularly in the higher elevation areas of the watershed onsite due to lack of development within these areas compared to the Project. This alternative would continue to be required to comply with applicable local, regional, state, and federal water quality protection and stormwater management requirements, further reducing the potential for significant impacts. Similar to the Project, required mitigation measures would minimize potential impacts to hydrologic resources during construction and reduce potential erosion of the realigned Froom Creek that could result from storm events. Additionally, avoidance of development within the Upper Terrace would prevent impacts to Drainages 1, 2, and 3, as well as hydrologically connected habitats downstream including grasslands and federal jurisdiction wetlands. Similar to the Project, impacts would be *less than significant with mitigation*.

### *Land Use and Planning*

Impacts under this alternative would be less than under the Project because, consistent with the requirements of the General Plan LUE, development would not occur above the 150-foot elevation line. By avoiding development in these upper elevations on site, this alternative would greatly improve consistency with adopted City policies. Required implementation measures would further increase habitat connectivity and compliance with Conservation and Open Space Policies 7.3.3, *Wildlife Habitat and Corridors*, and 7.7.7, *Preserve Ecotones*. Avoiding residential development above the 150-foot elevation line, including in the Upper Terrace of Villaggio and the northwestern portion of Madonna Froom Ranch, would minimize aesthetic impacts, as well as fire hazards, and would be consistent with the requirements of Hillside Planning Area policies in the City General Plan. As under the Project, this alternative would be required to implement mitigation measures to avoid significant impacts to the viability of the onsite agricultural easement. However, this alternative would continue to relocate structures within the historic Froom Ranch Dairy complex, resulting in the relocation and/or permanent loss of structures

composing a potential historic district despite implementation of mitigation measures and causing potential inconsistencies with COSE Policies 3.3.1, *Historic Preservation*, 3.3.3, *Historical Documentation*, and 3.3.4, *Changes to Historic Buildings*. Impacts would remain *significant and unavoidable*.

### *Noise*

Under this alternative, construction and operational noise impacts would be incrementally less adverse when compared to the Project. Despite elimination of commercial land uses in Madonna Froom Ranch and implementation of applicable mitigation measures, development of residential units and realignment of Froom Creek would continue to cause construction noise levels that exceed City noise thresholds for sensitive receptors adjacent to the Project site. Required implementation of mitigation measures similar to those under the Project would reduce exposure of proposed residential units to noise levels above City thresholds, as would substantial reductions in commercial development. Impacts resulting from operations of the Alternative would therefore be incrementally less than under the Project and would remain less than significant with mitigation.

### *Population and Housing*

Impacts to population and housing would be less than to the Project, as this alternative would develop a similar number of units but would not develop onsite commercial land uses. Assuming Citywide household size of 2.29 persons per household, this alternative would be expected to increase the City's population by approximately 1,384 persons, which is incrementally more than the Project. Assuming 550 square feet per job in planned commercial uses, this alternative would result in 182 fewer jobs than the Project, incrementally improving the City's existing jobs/housing imbalance by providing more housing compared to jobs onsite. Although this alternative would replace medium- high density units in Madonna Froom Ranch with high density units, potentially improving provision of workforce housing, this alternative would not result in additional affordable housing units as compared to the Project. As under the Project, impacts would be considered *less than significant*.

### *Public Services and Recreation*

This alternative would result in decreased impacts to public services due to elimination of commercial land uses that would be developed under the Project. Population increases resulting from the alternative are expected to be similar, and corresponding increases in demand and associated potential for impacts on police, fire protection, and education

services and facilities would also be similar to the Project. Elimination of commercial land uses on site would also incrementally decrease demand on these services due to elimination of uses which generate greater demands for service. While dedicated parkland within the Project site would continue to be deficient to serve the anticipated increase in population, this alternative would be required to implement mitigation measures to ensure appropriate recreational facilities would be maintained within the City's Sphere of Influence, and impacts would continue to be *less than significant with mitigation*.

#### *Transportation and Traffic*

Alternative 2 would have slightly fewer traffic and transportation impacts compared to the Project. Although additional residential units would be anticipated to increase traffic, Alternative 2 would not develop commercial units within Madonna Froom Ranch (e.g. hotel, retail) that would also contribute to increased daily trips. This alternative would be required to comply with applicable local, regional, state, and federal transportation requirements, and would require implementation of applicable mitigation measures to further reduce potential impacts. However, as trip generation and demand for multi-modal transportation facilities is expected to be approximately similar to the Project, impacts to area roadways would continue to be considered *significant and unavoidable* under Alternative 2 in the near-term while the Prado Road Overpass is constructed. As under the Project, cumulative impacts would be considered *less than significant with mitigation* once the Prado Road Overpass is complete.

#### *Utilities and Energy Conservation*

Impacts to utilities would be less severe when compared to the Project, due to the elimination of onsite commercial land uses and reduction in the development footprint. Elimination of commercial land uses would also reduce impacts to utility services such as solid waste disposal and electricity. In addition, similar to the Project, this alternative would continue to comply with applicable design, engineering, and installation requirements and guidelines to increase energy efficiency and minimize environmental impacts to the maximum extent feasible. Applicable mitigation measures would also be required under this alternative, and impacts would continue to be considered *less than significant with mitigation*.

#### *Mineral Resources*

Impacts to mineral resources would be incrementally reduced under this alternative as under the Project. This alternative would designate the existing red rock quarry for Open

Space/Conservation, theoretically retaining available acreage for extraction of this resource within the County. However, mineral resource extraction is prohibited in the City's General Plan and would not be allowed following adoption of the FRSP. Therefore, impacts to mineral resources within the City would continue to be *less than significant*.

### 5.4.2.4 Alternative 3 – Minimum LUE-Compliant Project Alternative

Alternative 3 would be a low-build alternative with the most restricted area for development and a major redesign of key Project elements. Alternative 3 would substantially reduce the development capacity of the Project site to the minimum development allowed by the General Plan LUE. This alternative would be most closely aligned with the existing General Plan LUE performance standards and minimum development policy framework for the Project site with regard to the land use mix and allowable development levels. Alternative 3 would support 200 multiple family residential units, 50,000 sf of commercial uses and 3.0 acres of public facilities, but would not support development of a Life Plan Community. This development would be clustered in already-disturbed areas of the Project site on the northern side and below the 150-foot elevation line, which would avoid or minimize a range of environmental impacts identified in this EIR. Alternative 3 would reduce or change Project impacts through:

1. Residential development would be reduced to 200 units consistent with the minimum development performance standards of the LUE SP-3, Madonna on LOVR Specific Plan Area, from 582 units and 51 beds under the Project (an approximately 65.6 percent reduction). Residential uses would be confined to 10 acres that would be developed under R-3-SP Medium-High Density zoning at a maximum density of 20 units/acre;
2. Commercial development would be reduced to 50,000 sf consistent with the minimum development performance standards of the LUE SP-3, a reduction of 50 percent from the Project, with commercial uses limited to 2.5 acres compared to 3.1 acres under the Project;
3. The Villaggio Life Plan Community would no longer be developed, thereby avoiding a range of impacts associated with biological and cultural resources (particularly in the Upper Terrace), hydrology and water quality, and fire hazards but also not maximizing housing production to address jobs housing balance issues, particularly for senior housing, consistent with City Housing goals;

4. Froom Creek would not be realigned, thereby avoiding the potential impacts and benefits associated with this major element of the Project. The existing Irish Hills stormwater detention basin system would be retained and expanded or modified to accommodate any increases in runoff under this alternative. Internal drainage and stormwater improvements to slow and infiltrate runoff into the soil within developed areas would remain similar to the Project;
5. Road improvements, including Commercial Collectors A and B would remain similar to the Project, along with required widening of LOVR, with associated impacts to riparian and wetland habitats along LOVR ditch, but no local or private roads would be needed to serve Alternative 3;
6. Consistent with the City's General Plan, all development would be confined to areas below 150-foot elevation;
7. Emergency access would be provided at only two different connections: 1) from the Irish Hills Plaza into Madonna Froom Ranch; and 2) from LOVR to the southern area of Madonna Froom Ranch.
8. Required discretionary actions would be similar to the proposed Project, while the construction phasing plan would be accelerated.

#### Land Use Plan and Site Design

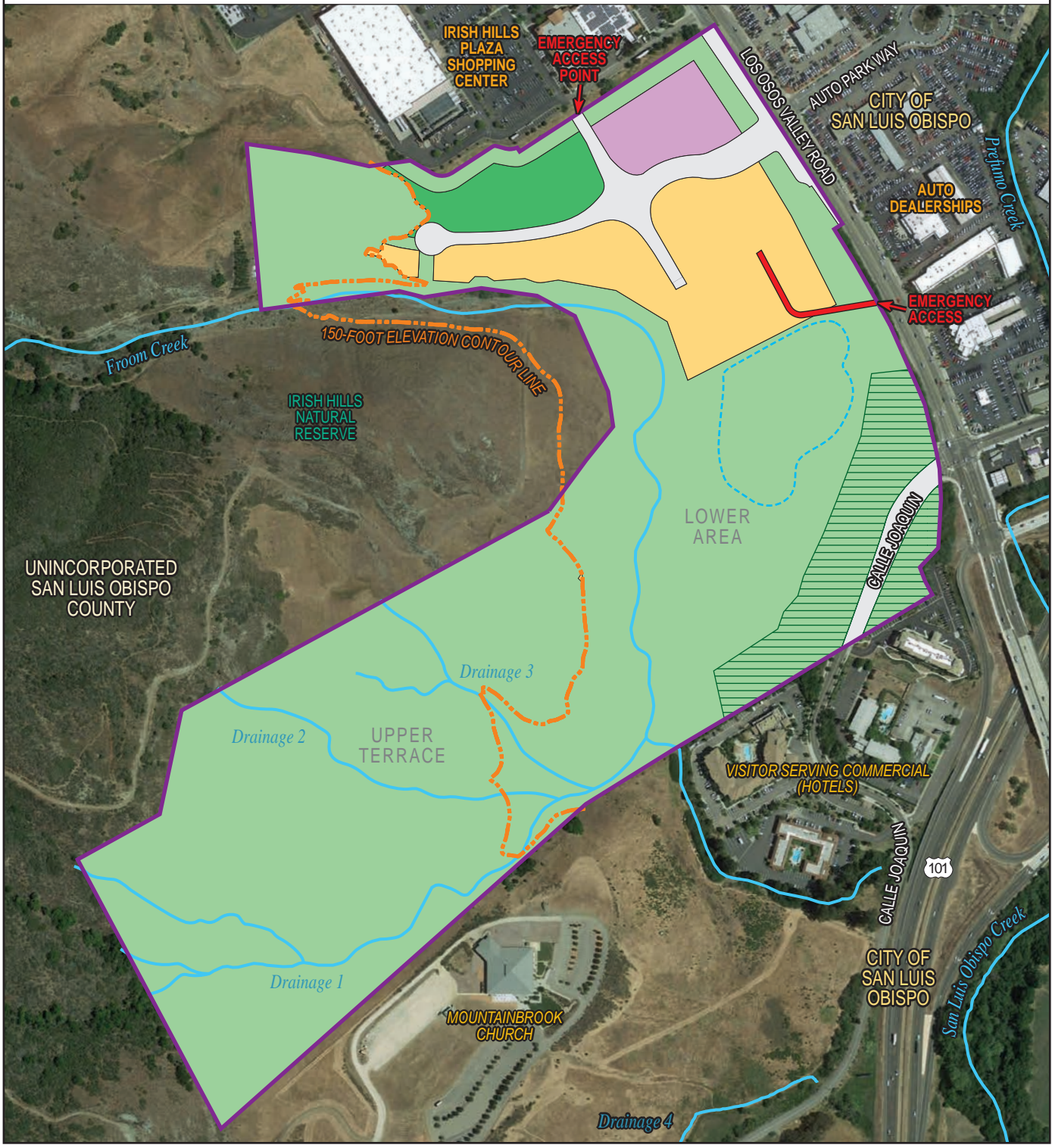
Alternative 3 would maximize clustering of development compared to the Project and Alternatives 1 and 2, limiting residential and commercial land uses and associated roads and infrastructure to less than a 20-acre area of the Project site below 150-foot elevation (see Figure 5-5). Overall developed area would decrease by roughly 30 acres, compared to the Project, with 89 acres of the Project Site (81 percent) retained as Conservation/Open Space. Both the Upper Terrace and the majority of the lower area of Villaggio would remain as contiguous open space, substantially reducing direct and indirect habitat disturbance. The quarry on Madonna Froom Ranch adjacent to the Irish Hills Natural Reserve would also become open space under this alternative.

**LEGEND**

- Project Site
- Existing 3.2-Acre Stormwater Basin
- Proposed Specific Plan Land Use*
- Public Site Access Roadways: 3.8 acres
- Reconfigured Open Space and Agricultural Conservation Easement
- C-R-SP – Retail Commercial/ General Commercial: 2.5 acres
- C/OS-SP – Conservation/Open Space: 89.0 acres
- PF-SP – Public Facilities: 3.0 acres
- R-3-SP – Medium-High Density Residential: 10.0 acres



Aerial Source: Google 2018.



Alternative 3 Land Use Plan

**FIGURE 5-5**



**Table 5-16. Summary of Alternative 3 Zoning and Land Uses**

Proposed Zones	Acreage	Housing Units/ sf
<b>R-3-SP Medium-High Density Residential</b>	<b>10</b>	<b>200 multi-family units</b>
<b>C-R-SP Retail-Commercial</b>	<b>2.5</b>	<b>50,000 sf</b>
<b>PF-SP Public Facilities</b>	<b>3.0</b>	<b>--</b>
<b>ADDITIONAL USES</b>		
<b>C/OS-SP Conservation/ Open Space</b>	<b>88.9</b>	<b>--</b>
<i>Designated Open Space</i>	<i>81.8</i>	<i>--</i>
<i>Reconfigured Agricultural Easement</i>	<i>7.1</i>	<i>--</i>
<b>Roadways</b>	<b>5.6</b>	<b>--</b>
<b>TOTAL</b>	<b>109.7</b>	<b>200 units<sup>1</sup> 50,000 sf commercial</b>

<sup>1</sup> Total matches minimum performance standards as allowed in Section 8.1.5 of the General Plan LUE. This total assumes all units planned within residential land uses.

Madonna From Ranch would continue to provide multi-family housing, but development would be contained within 10 acres of Medium-High Density Residential (R-3-SP) zoning designation, with a density of 20 units per acre under Alternative 3. A majority of these multi-family homes would be located away from the habitats and high fire hazards of the Irish Hills Natural Reserve. Approximately four acres would be located in an area along the northern bank of From Creek, which would provide somewhat of a fire buffer between this area and high fire hazards within the Irish Hills Natural Reserve.

Areas proposed for Medium-High Density Residential (R-3-SP) uses under Alternative 3 would be limited to existing disturbed areas on the northeastern portion of the site and outside of the existing onsite stormwater detention basin. Similar to the Project, the northwestern corner of the site would be designated for Retail-Commercial (C-R-SP) uses, but would only accommodate up to 50,000 sf. This alternative includes a trailhead park within 3.0 acres of Public Facilities (PF-SP) designated area in the same location as under the Project, but under the 150-foot elevation line. Areas within the quarry above the 150-foot elevation contour line adjacent to the Irish Hills Natural Reserve would be set aside as open space. These changes would ensure the land use plan better aligns with the policies of the City's General Plan regarding development above the 150-foot elevation contour. Since Alternative 3 would not involve development above the 150-foot elevation, this

alternative would not require a General Plan amendment to address this policy inconsistency associated with the Project.

Froom Creek would not be realigned and restored under Alternative 3 and stormwater management would be supported partially by existing onsite infrastructure, which may require upgrades or modifications to accommodate site development. The need for grading, retaining walls, and fencing would be substantially less severe when compared to the Project. Site disturbance would be limited to approximately 21.1 acres of relatively level terrain that would not require substantial excavations, barring potential low-lying retaining walls along Froom Creek, which is currently perched behind a manmade berm along the central portions of the site.

### Circulation and Site Access

Similar to the Project, circulation under Alternative 3 would entail provision of public roadways within Madonna Froom Ranch (Collectors A and B). All development would be restricted to below the 150-foot elevation contour and would not extend substantially into the lower area of Villaggio; therefore, the road system would be reduced in length compared to the Project. Similar to the Project, Alternative 3 would have a primary entrance from LOVR at Auto Park Way. Public roadways would lead to the trailhead park and Madonna Froom Ranch neighborhoods. Major components of the Alternative 3 circulation system are similar to the Project and are summarized below:

1. A proposed signalized intersection with LOVR and proposed roadway to serve as the primary access to the Specific Plan area;
2. Widening of LOVR along a portion of the Project site's frontage;
3. Proposed internal roadway network consisting of public roads;
4. Proposed bicycle and pedestrian facilities on public roads;
5. Parking facilities to accommodate residents, employees, and visitors within the Specific Plan area; and
6. A new bus stop that would be integrated into the regional public transportation system.
7. Two separate emergency access points would be provided (see Figure 5-5) while the Mountainbrook Church emergency access road would be deleted.



Proposed Housing and Population

Alternative 3 would provide substantially fewer units than the Project. Under this alternative, 200 multi-family units would accommodate approximately 458 new residents, assuming 2.29 persons per household.

Analysis – Alternative 3 (Minimum LUE-Compliant Alternative)

Impacts under this alternative would be considerably less than that of the Project. Primary tradeoffs would consist of lower intensity buildout of both residential and commercial land uses under this alternative, as well as elimination of development above the 150-foot elevation line. Residential units would decrease by 378 units (65 percent) and commercial development area would decrease by 50,000 square feet (50 percent). Additionally, senior housing units would not be provided within a Life Plan Community. Froom Creek would not be realigned under this project, reducing potential impacts to noise and other affected resources; however, lack of realignment of the creek would not support restoration or improvement of the creek corridor to provide improved steelhead habitat or alleviate flood capacity constraints downstream at U.S. 101. Retaining the majority of the site as open space, including avoiding development above the 150-foot elevation line, would greatly decrease potential environmental impacts, including impacts to biology, aesthetics, and wildfire hazards.

*Aesthetics and Visual Resources*

Impacts to scenic resources onsite would be greatly decreased under this alternative as a result of reduced development, particularly in areas of higher elevation. Avoiding development above the 150-foot elevation would protect onsite scenic resources, including natural habitats, open grazing land, and serpentine rock outcroppings. Designation of the majority of the site as Conservation/Open Space would smooth visual transitions from rural landscapes to commercial and residential development, substantially reducing impacts to visual character of the Project site and surrounding area for viewers within the Irish Hills Natural Reserve as compared to the Project. Implementation of MM VIS-1, requiring vegetative screens for buildings and associated infrastructure, would ensure potential impacts to aesthetic character would be *less than significant*. Impacts to nighttime lighting and glare would also be reduced as compared to the project due to substantial reduction in development area and associated exterior lighting.

### *Agricultural Resources*

The area impacted by development under this alternative would be substantially less severe when compared to the Project; this alternative would avoid development within the Upper Terrace and the majority of the lower portion of Villaggio. This alternative would result in greater protection of agricultural land currently used for grazing as open space, therefore, impacts to agricultural resources would be reduced compared to the Project. Impacts would remain *less than significant*.

### *Air Quality and GHG Emissions*

Impacts to air quality and GHG emissions would be substantially reduced under this alternative, as overall commercial development would be reduced by half and residential development would be reduced by 378 units as compared to the Project. Grading required for building construction would be substantially lessened under this alternative, which would greatly decrease emissions from heavy construction equipment. This alternative would also reduce anticipated population increases by more than half, and corresponding reductions in vehicle trips associated with reductions in residential, commercial, and senior residential land uses. These reductions in development would also result in a decrease in emissions generated onsite. Additionally, this alternative would be required to implement applicable mitigation measures to further reduce potential impacts to air quality. As a result, impacts to air quality from construction and operation of this alternative are estimated to be lower than APCD thresholds and would no longer be considered significant. Similar to the determination in the LUCE Update EIR, implementation of the City's General Plan would not be consistent with the assumptions contained in the Clean Air Plan. Therefore, specific to consistency with the Clean Air Plan and potential impacts related to GHG emissions from mobile sources, it is expected Alternative 3 would result in *significant and unavoidable impacts*. All other air quality and GHG impacts are anticipated to be *less than significant with mitigation*.

### *Biological Resources*

Impacts under this alternative would substantially reduce potential impacts to biological resources as compared to the Project. This alternative would not include development above the 150-foot elevation line or realignment of Froom Creek, and would substantially reduce the development area and required onsite construction grading as compared to the Project. Reduced development onsite would minimize impacts to sensitive species, drainages, and onsite wetlands that would occur under the Project, although there is

potential for sensitive-species to occur within the development footprint of Alternative 3. Development of areas below the 150-foot elevation line would be greatly limited west of Fromm Creek, and habitat connectivity and ecotone protection would be substantially increased as compared to the Project. Additionally, this alternative would develop 14.7 acres of residential units within the lower area of Villaggio, as compared to 23.4 acres under the Project, preserving an additional 8.7 acres of sensitive grasslands onsite, including serpentine bunchgrass. Continued required implementation of mitigation measures as described under Section 3.4, Biological Resources, would further reduce potential impacts to sensitive and protected species and natural habitats onsite. However, although Fromm Creek would not be realigned under this alternative, roadway improvements along LOVR would continue to result in significant impacts to a federal jurisdiction wetlands mapped within the LOVR ditch. Lack of realignment of Fromm Creek would also not support improved steelhead habitat, as is proposed under the Project. With restoration requirements, impacts would be less than significant with mitigation.

#### *Cultural and Tribal Cultural Resources*

Impacts to cultural and tribal cultural resources under this alternative would be reduced, as the reduction in developed area within the Project site and a 278-unit reduction of residential units would decrease potential for incidental discovery and impacts. Site preparation and grading would still occur within areas containing sensitive cultural resources, though mitigation measures would be implemented to reduce potential impacts to less than significant during operation and construction of this alternative. Although mitigation measures would be implemented, relocation of dairy structures on the Fromm Ranch to avoid fault lines would continue to have *significant and unavoidable* impacts on potentially significant historic resources.

#### *Geology and Soils*

Under this alternative, impacts related to geologic and soil resources would be less severe when compared to the Project due to reduced commercial and residential development and minimal geologic hazards onsite. As under the Project, design and construction of proposed land uses under this alternative would be subject to several requirements and regulations to ensure structural integrity in seismically active areas. Additionally, residential development would be reduced by 278 units and commercial land uses would be reduced by 50,000 square feet, lessening potential impacts to residents, employees, and consumers located onsite. By locating development outside of fault setbacks and implementing the most current industry standards for structural design, impacts of structural failure and risks

to life and property due to seismic shaking and seismic-related ground failure under this alternative would be reduced as compared to the Project, and potential impacts would remain *less than significant*.

### *Hazards, Hazardous Materials, and Wildfire*

Under this alternative, impacts related to fire hazards, hazardous materials, and airport operations would be less than under the Project due to reduced construction activities associated with substantial development reductions and smaller building footprints. Reduction of development areas to already disturbed portions of the site in the northeast corner would reduce urban-wildland interface by approximately 75 percent, reducing defensible space requirements and increasing the distance between proposed residential units and wildfires originating from western upland areas with very high fire hazard potential. Additionally, similar to the Project, this alternative would also be required to implement required mitigation measures that would decrease likelihood of wildfires, improve fire response evacuation, and ensure firefighters can attack fires encroaching on the Project site from the Irish Hills Natural Reserve. Potential impacts from hazardous materials and aircraft 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 or exposure to airport safety hazards would result from this alternative. However, as under the Project, Alternative 3 would be located in an area highly susceptible to potential fire hazards, particularly at the base of the Fromm Creek watershed where steep slopes and prevailing winds increase potential for a fire in the Irish Hills to move towards the site, and impacts would remain *significant and unavoidable*.

### *Hydrology and Water Quality*

Under this alternative, impacts related to hydrology and water quality would be less than those of the Project due to substantial reductions in development and retention of Fromm Creek in its existing alignment onsite. This alternative would result in 21.1 acres of development, including 12.5 acres of residential and commercial uses, considerably decreasing impervious surfaces as compared to the Project. Decreased construction of pervious surfaces would increase groundwater recharge onsite and reduce the potential for erosion, stormwater runoff, and onsite flooding as compared to the Project. The existing onsite stormwater detention basin would continue to attenuate runoff from Irish Hills Plaza and would be upgraded or modified under Alternative 3 to support limited additional

development on the Project site. However, impacts to flooding are likely to be increased compared to the Project due to lack of proposed flood control improvements which would alleviate capacity constraints at the U.S. 101 box culvert. Therefore, capacity constraints would persist under this alternative, though this alternative would not contribute towards those existing impacts. Mitigation measures implemented under this alternative would continue to minimize potential impacts to hydrologic resources during construction. Additionally, avoidance of development within the Upper Terrace would reduce the potential for pollutants to enter Drainages 1, 2, or 3 and other hydrologically connected sensitive habitats onsite. Therefore, impacts would be *less than significant with mitigation*.

#### *Land Use and Planning*

Impacts under this alternative would be considerably less than under the Project, as development would not occur above the 150-foot elevation line. By avoiding development within the Upper Terrace and west of Froom Creek, this alternative would eliminate impacts to serpentine native bunchgrass grassland habitats and minimize impacts to springs, seeps, and wetlands along Drainages 1, 2 and 3, as well as associated impacts to 12 special status plant species. As a result, this alternative would comply with the General Plan, including COSE Policies 7.3.1, *Protect Listed Species*, and 7.3.2, *Protect Species of Local Concern*. Retaining the majority of the site as open space would minimize aesthetic impacts and would be consistent with Hillside Planning Area policies in the City's General Plan. However, this alternative would continue to relocate the historic Froom Ranch Dairy complex to preserve onsite historic structures and remove them from identified fault hazard areas, resulting in permanent loss of structures composing a potential historic district despite implementation of mitigation measures and causing potential inconsistencies with COSE Policies 3.3.1, *Historic Preservation*, 3.3.3, *Historical Documentation*, and 3.3.4, *Changes to Historic Buildings*. Impacts would remain *significant and unavoidable* due to inconsistency with City policies and regulations.

#### *Noise*

Under this alternative, construction and operational noise impacts would be substantially less severe when compared to the Project. Construction duration would be much shorter than the Project and there would be no overlap in phases. All construction equipment would be isolated on the northern side of the site, well away from sensitive receptors in the adjacent hotel properties and Mountainbrook Church to the south. This alternative would substantially reduce overall commercial and residential land uses as compared to the

Project and would continue to implement all applicable mitigation measures. Noise impacts would be less than significant with mitigation.

### *Population and Housing*

Impacts to population and housing would be less severe when compared to the Project, as the alternative would develop 378 less residential units and 50,000 square feet less commercial land uses. Assuming Citywide household size of 2.29 persons per household, this alternative would result in housing for approximately 458 people, or 866 less people than under the Project. This alternative would locate all residences within medium-high density residential land uses, and senior living units would not be produced. Additionally, this alternative would be expected to result in 91 less jobs than under the Project. Given this alternative does not proposed a Life Community Plan, the development of 200 residential units would result in an increase in housing that would count towards the City's housing supply. In compliance with City requirements, the additional 26 multi-family residential units counting towards City housing supply would result in provision of additional affordable housing units that would be constructed under inclusionary housing requirements. Impacts would continue to be considered *less than significant*.

### *Public Services and Recreation*

This alternative would result in decreased impacts to public services due to substantial reduction of commercial and residential land uses as compared to the Project. Residential population resulting from the alternative would be substantially reduced for this alternative, and corresponding increases in demand on police, fire protection, and education services and facilities would also be reduced. Reduction of commercial land uses on site by 50 percent would further reduce onsite population and decreased demand on these services. Given elimination of senior living units and associated recreational amenities, it would be reasonable to anticipate increased per capita demand for parkland, although overall population on the Project site would be substantially reduced compared to the Project. While dedicated parkland within the Project site would continue to be deficient to serve the expected increase in population and would require payment of in-lieu fees, this alternative would continue to implement mitigation measures ensuring appropriate recreational facilities would be maintained within the City's Sphere of Influence, and impacts would continue to be considered *less than significant with mitigation*.

### *Transportation and Traffic*

Alternative 3 would have substantially reduced impacts to transportation as compared to the Project, as the development footprint would be considerably minimized, and trips would be reduced. This alternative would reduce residential units by 65 percent and commercial square footage by 50 percent compared to the Project. This large reduction in development footprint would be significantly lower anticipated addition of trips to internal and area roadways. Additionally, this alternative is consistent with the General Plan LUE and the environmental impact analysis conducted in the LUCE Update EIR (City of San Luis Obispo 2014). Finally, this alternative would comply with all applicable local, regional, state, and federal requirements, as well as applicable mitigation measures. Therefore, impacts under this alternative would be considered *less than significant*.

### *Utilities and Energy Conservation*

Impacts to utilities would be less severe when compared to the Project, due to the overall substantial reductions of onsite commercial and residential land uses and reduction in the development footprint. By reducing urban development onsite, this alternative would considerably reduce potential demands for water, wastewater treatment, solid waste disposal, and energy. Reduction of commercial land uses by 50 percent and residential units by 378 units would considerably reduce impacts to utility services. In addition to utilization of appropriate mitigation measures, this alternative would continue to comply with applicable design, engineering, and installation requirements and guidelines to increase energy efficiency and minimize environmental impacts to the maximum extent feasible. As a result, impacts would continue to be *less than significant with mitigation* under this alternative.

### *Mineral Resources*

Impacts to mineral resources would be incrementally reduced under this alternative as under the Project. The Alternative would designate the existing red rock quarry for Open Space/Conservation, theoretically retaining available acreage for extraction of this resource within the County. However, mineral resource extraction is prohibited under the City and would not be allowed following adoption of the FRSP. Therefore, impacts to mineral resources within the City would continue to be considered *less than significant*.

### 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 5-17 summarizes the environmental advantages and disadvantages associated with the proposed Project and the four analyzed alternatives. Although the No Project Alternative would result in the least amount of impacts, 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 the No Project Alternative would result in the least amount of impacts, this alternative would not meet most Project objectives. Given this, Alternative 1 is considered to be the environmentally superior alternative since impacts would be reduced for many issue areas and all Project objectives would be met, as described below. Alternative 1 would substantially reduce impacts as compared to the Project in the following resource areas: aesthetics and visual resources; biological resources; cultural and tribal cultural resources; hazards, hazardous materials, and wildfires; and land use and planning. For instance, avoidance of development within the Upper Terrace area of Villaggio would greatly eliminate impacts to biological resources, including serpentine native bunchgrass grassland habitats, and would minimize impacts to springs, seeps, and wetland habitats along Drainages 1, 2, and 3, as well as associated impacts to 12 special status plant species. Despite substantial reductions to many impacts under Alternative 1 as compared to the Project, Alternative 1 would continue to result in significant and unavoidable impacts to air quality and greenhouse gases; biological resources; historic resources; hazards, hazardous materials, and wildfires; land use and planning; noise; and transportation and traffic.

Alternative 1 would also achieve all of the Project objectives. This alternative is largely consistent with the General Plan LUE, and would develop a mix of commercial, residential, and open space/recreation uses on the Project site. A variety of housing opportunities would be available, including affordable housing as well as potentially more affordable, higher density multi-family housing opportunities and 404 residential units for seniors in a Life Plan Community. The Project site would provide additional opportunities to access the Irish Hills Natural Reserve system, as well as new public parkland within the Project



site that would be located adjacent to the Irish Hills Natural Reserve. Avoidance of development within the Upper Terrace area preserves sensitive plant and wildlife species, including the state- and federally-endangered Chorro Creek bog thistle, as well as important drainages and wetlands within this area. Additionally, realignment of Froom Creek under Alternative 1 would improve stormwater conveyance and create riparian habitat, enhancing fish habitat, and biological resource value. Alternative 1 would be similar to the Project in its contribution to the regional transportation system and 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 5-17.

**Table 5-17. Impact Comparison of Alternatives to the Proposed Project**

<b>Issue Area</b>	<b>No Project</b>	<b>Alternative 1 – Clustered Development Below the 150- Foot Elevation Alternative (Actionable Alternative)</b>	<b>Alternative 2 – Residential Development Project Alternative</b>	<b>Alternative 3 – Minimum LUE- Compliant Project Alternative</b>
<b>Aesthetics and Visual Resources</b>	Less	Less	Less	Less
<b>Agricultural Resources</b>	Less	Similar	Similar	Less
<b>Air Quality and GHG Emissions</b>	Less	Similar	Similar	Less
<b>Biological Resources</b>	Less	Less	Less	Less
<b>Cultural and Tribal Resources</b>	Greater	Less	Less	Less
<b>Geology and Soils</b>	Less	Similar	Similar	Similar
<b>Hazards, Hazardous Materials, and Wildfires</b>	Less	Less	Less	Less
<b>Hydrology and Water Quality</b>	Less	Similar	Similar	Less
<b>Land Use and Planning</b>	Less	Less	Less	Less
<b>Noise</b>	Less	Less	Less	Less
<b>Population and Housing</b>	Greater	Similar	Similar	Less
<b>Public Services</b>	Less	Similar	Similar	Less
<b>Transportation and Traffic</b>	Less	Similar	Similar	Less
<b>Utilities and Energy Conservation</b>	Less	Similar	Similar	Less
<b>Mineral Resources</b>	Less	Similar	Similar	Similar
<b>Project Objectives Met?</b>	No	Yes	Partially	Partially