

TO: City of San Luis Obispo Cultural Heritage Committee  
FROM: Neil Havlik

SUBJECT: FROOM RANCH PROJECT PROPOSAL AGENDA ITEM, November 18, 2019

Dear Committee Members:

At your meeting of November 18, 2019, you are being asked to provide input into the Draft Environmental Impact Report (DEIR) of the Froom Ranch Specific Plan Project (the "Project"), located on Los Osos Valley Road and Calle Joaquin.

I am sorry that I will not be able to be present at your meeting, but I am currently out of the State on a previously planned visit with family members.

Since the DEIR was only released to the public on November 8, 2019, and is hundreds of pages long, I presume that you have not really had time to review and consider it in any detail.

However, I draw your attention to the two chapters (Cultural and Tribal Cultural Resources, and Alternatives) dealing with matters most directly under your purview, especially to the alternatives section, which outlines alternative ways to undertake the project.

Alternative #1 is the so-called "actionable alternative", required by the City Council as part of its permission for the project sponsors to undertake their planning. This alternative was specifically required to detail how the project could be developed while maintaining one of the City's most important environmental policies, that of preservation of lands above the 150 foot elevation at the base of the Irish Hills. This policy has been in effect for 25 years and has played an important role in the creation and growth of the Irish Hills Natural Reserve. It significantly reduces the negative impacts of the proposed project in many important regards, including ecological impact, impact upon recreational uses of Irish Hills Natural Reserve, and upon the cultural (historic and archeological) resources of the area.

A survey of the dairy farm complex identified four buildings which were recommended for restoration or replication. You may recall that, at the time of the Notice of Preparation (NOP) for the DEIR, it was not considered feasible to move the large barn building, and as a result the proposed project includes the construction of a replica of this building. Also the barn needs to be moved as it was found to sit on the trace of the potentially active Los Osos Fault. The other buildings will be moved as well. The project sponsors propose to keep the buildings in the same general area as they are today, and claim that certain measured distances between the buildings would be retained and that this somehow preserves the historical character of the site.

It has been previously argued before your commission that the buildings should be moved to what is referred to as the "storage area" to the west of the dairy site, which would provide a much more appropriate setting (oriented to the Irish Hills Natural Reserve) for this historic complex than being situated among a bunch of apartments and commercial buildings fronting on

a busy street. Though it would lie just above the 150 foot elevation, the public park and trailhead, dairy complex, and Froom Creek restoration constitute a public amenity that can be justified at that elevation, whereas typical private residential development cannot.

The DEIR supports this viewpoint. It states (see page 5-67 of the DEIR) that “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.”

The DEIR likewise states that Alternative #1 would reduce impacts upon archeological resources by keeping urban development below the 150 foot elevation at the so-called “terrace” area, sparing it from the significant grading disturbance associated with such development.

It is clear that Alternative #1 is much preferable to the project as proposed with regard to its cultural impacts. It must be noted that those impacts are still considered significant and unavoidable; however, that is due to the fact that the dairy site will be destroyed and a number of its buildings demolished in any case, and also to the fact that some disturbance or damage may still occur to archeological resources. The very existence of the proposed project leads to these significant and unavoidable impacts being recognized. But reducing them significantly, and locating the remaining buildings of the dairy farm into a still-rural setting is much better in the long run for the community than what is proposed under the current Project.

Creating an historic and trailhead park at the storage area would have other community benefits. Trail access to the Irish Hills Natural Reserve would be immediate: four major trails come off of this spot, with fifth and sixth trails within another 1/3 to 1/2 mile. Also, Froom Creek in that immediate vicinity offers a great opportunity for restoration, unlike the flood control channel-like facility proposed further downstream. Thus the historic/trailhead park offers opportunities for preservation of the historic buildings in a rural, more attractive setting, immediate access to a comprehensive trail system, and the opportunity to have immediate access to an ecological restoration effort right at the trailhead for our citizens and our environment.

I urge your Commission to recognize the values of this approach compared to the proposed project, and recommend to the City Council that it select Alternative #1 as the project to consider further for possible annexation and development.

Thank you.

Neil Havlik, PhD,  
City of San Luis Obispo Natural Resources Manager (retired)

November 17, 2019