

TO: City of San Luis Obispo Parks and Recreation Commission  
FROM: Neil Havlik

SUBJECT: FROOM RANCH PROJECT PROPOSAL AGENDA ITEM, December 4, 2019

Dear Commissioners:

At your meeting of December 4, 2019, you will be 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 would like to draw your attention to the overriding feature of this project, and that is the requested abandonment of the elevation limit line for the Irish Hills, embodied in the City of San Luis Obispo's General Plan. The General Plan (LUE Policy 6.4.7: Hillside Planning Areas, Section H) states: "The Irish Hills area should secure permanent open space with no building sites above the 150-foot elevation, in conjunction with any subdivision or development of the lower areas"). This policy has been in effect for more than 25 years, and has led to the creation and growth of the City's largest and most ecologically diverse natural area, the 1,300 acre Irish Hills Natural Reserve. This great open space, with its rich biology, geology, and history, is home to miles of multi-use trails that are enjoyed by our citizens every day. It is in many ways the flagship of the City's open space system. Over the years your Commission has been closely involved in the establishment, growth, planning, and development of the Natural Reserve for the Community's benefit. It is your duty and obligation to preserve and protect the beauty, integrity, and usability of City parks and open space lands. It is incumbent upon you to faithfully adhere to that role as you review the document that could fundamentally change the character of this open space.

The Froom Ranch project as proposed in the DEIR seeks to exceed the 150 foot elevation limit in two places: at the northwestern corner of the project site (which I refer to as the "storage area"), and the larger and higher plateau or terrace area on the southwestern portion of the site. Looking at the project map, one can see that the Froom Ranch wraps around a portion of Irish Hills Natural Area. This configuration is the result of establishment of a scenic easement by the County of San Luis Obispo some years ago, related to the Home Depot project, which was originally developed in the unincorporated area of San Luis Obispo County. Later on the area covered by this easement was included in lands purchased by the City to bring the many trails in the area into public ownership. In fact, four trails join immediately adjacent to the storage area; two more branch off less than ½ mile away. Allowing the proposed development above the 150 foot elevation in this area will significantly degrade the experience of visitors to Irish Hills Natural Area, since numerous trails pass along or through this portion of it.

The November 25, 2019 edition of the San Luis Obispo Tribune (page 3) carried an article about the Froom Ranch development, in which the newspaper reported that a spokesperson for the developers stated that they would no longer pursue development above the 150 foot elevation. While this is a welcome change, it does not appear to be completely true, as the project at the

northwestern corner of the property still proposes to develop above that level, immediately adjacent to Irish Hills Natural Reserve.

This impact---and a means of avoiding much of it---is included in the DEIR. The DEIR recognizes that there would be a loss of scenic, aesthetic, and environmental values if the project goes forward as proposed. However, the California Environmental Quality Act (CEQA) requires that the DEIR evaluate alternatives, and if appropriate identify an “environmentally superior” alternative; that is, an alternative design that avoids or reduces the environmental impacts of the project while still attaining as many of the goals of the project as possible.

The DEIR does this.

Alternative #1 is the so-called “actionable alternative”, which was required by the City Council as part of its permission for the project sponsors to undertake their planning in 2017. This alternative was specifically required to detail how the project could be developed while staying below the 150 foot elevation at the base of the Irish Hills. Among other things, Alternative #1 calls for restricting development to below the 150 foot elevation, and placing a proposed trailhead and historic park at the storage area, where it would be immediately adjacent to the existing Natural Reserve. Such a public amenity associated historically and recreationally with the adjacent open space can be justified at that location, whereas private residential development there cannot be so justified. That is why Alternative #1 is identified in the DEIR as “the environmentally superior alternative”.

Alternative #1 and two other alternative projects would significantly reduce the negative impacts of the proposed project in many important regards, including ecological impact, impact upon recreational uses of Irish Hills Natural Reserve, on the scenic and aesthetic views from the Reserve, and upon the cultural (historic and archeological) resources of the area. They would also allow for immediate trail access to the Irish Hills Natural Reserve: as noted above, four major trails come off of this spot, with fifth and sixth trails within another ½ mile. Also, Froom Creek in the immediate vicinity of the storage area offers a great opportunity for true restoration, unlike the flood control channel-like facility proposed further downstream. 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 an ecological restoration effort right at the trailhead for our citizens and our environment.

With regard to the historic structures at the former Froom Dairy, the DEIR specifically 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.” What this is saying is that the structures should be relocated to the storage area, and be part of a trailhead/historic park there.

The DEIR states that Alternatives #1, 2 and 3 would all significantly reduce the impacts upon ecological, archeological, scenic, and aesthetic 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. Among other things, this would eliminate the need for a road to service the development proposed here, which would be severely impact the quality of experience for users of the Natural Reserve. The terrace could and should be added to the Natural Reserve. Likewise, the storage area could be cleaned up and the historic structures relocated there along with a true trailhead, and with real restoration of Froom Creek in that location. That site could also be added to the Reserve or protected in some similar manner.

Finally, there is the issue of buffers. City policy states that the boundaries between City owned lands and private development should include buffers, and that those buffers should be part of the development and not as encroachments into the City lands. It is not certain whether the proposed development does this, but I believe your commission should seek greater detail as to how the urban development proposed next to the Natural Reserve will interface with it. This is part of your duty to the lands within your purview.

Your Commission has the duty to do the best that it can to preserve, protect and enhance the park and open space resources of the City of San Luis Obispo. In this instance that duty demands that you seek the best outcome relative to Irish Hills Natural Reserve by recommending to the City Council (1) that the original project proposal (which is the subject of the DEIR) be rejected in favor of one of the other Alternatives, (2) that the project not develop any building sites above the 150 foot elevation line, except for the trailhead park and associated historical features, (a public amenity as noted above) and (3) that the City Council insist on adequate buffers (consistent with Policy 8.3.2 of the City’s General Plan Conservation and Open Space Element) between any proposed new development and Irish Hill Natural Reserve. By so doing you will be defending the General Plan, and defending the integrity of the Natural Reserve. Thank you.

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

December 4, 2019

*(Postscript and Disclosure: After my retirement as City Natural Resources Manager in July 2012, the City did me the honor of naming the trail near this boundary after me, as Neil Havlik Way. While I am gratified by this honor, I can assure your Commission that this designation has no influence on my attitude toward the proposed development adjacent to this sensitive area. I am concerned solely with protecting the integrity of Irish Hills Natural Reserve to the best of my ability, and making it the best it can be.—N.H.)*