3.1 AESTHETICS AND VISUAL RESOURCES

This section describes the existing aesthetic setting of the Project site and vicinity and analyzes the potential impacts to aesthetics that could result with development of the Project. Aesthetic and visual resources are principally defined by how viewers perceive the visual attractiveness of an area. Based on this subjective perception, the key elements and features that create or enhance an area's visual quality are definable. Most communities recognize scenic resources as important assets, although specific valued scenic resources may vary depending on the community and context. In general, visual resources are features of urban (built) or natural environments with a high aesthetic or scenic value. In the City, regional natural environmental features contribute to the community's aesthetic character and visual quality and include views of open space, wildlife habitats/corridors, and vegetation; natural site features such as landforms, valleys, and creeks; undeveloped hillsides; and agricultural landscapes. In a suburban setting, like the Project site, aesthetic and visual resources typically consist of a combination of natural features (e.g., Irish Hills) and high-valued built features that contribute to a community's inherent character and overall identity and can include historic structures, buildings, or landscapes; designated scenic routes; and scenic public vistas. Public views are those that are experienced from a publicly accessible vantage point.

3.1.1 Existing Setting

3.1.1.1 General Visual Character

The City is set at the base of several hills and ridges that visually define the edges of urban development and provide a natural backdrop to most view corridors. The hills, ridges, and outcroppings, including the Irish Hills, Cerro San Luis Obispo, and Bishop Peak, provide recognizable physical landmarks within the City and visually frame the City in its natural context. The topography of the hillsides has also constrained development to lower elevations, creating a defined edge to the City.



Visual resources in the City are derived from its natural setting against hillsides and open space areas, including the Irish Hills along the southern edge of the City, as well as the City's rich history embodied in historic structures and settings. Source: hikespeak.com

Outside the urban edge of the City, unincorporated areas are agricultural in nature, providing grazing land and natural vegetation.

The City's built environment is defined by its historic downtown with a compact urban form centered on a street grid that extends out to less dense suburban neighborhoods and shopping centers on the City edges. Historic structures and districts within the City demarcate a rich history of habitation and development, including agricultural development such as the historic Froom Ranch Dairy Farm (see also, Section 3.5, *Cultural and Tribal Cultural Resources*). The City maintains a small-town character as a quintessential Central Coast town while also providing a wide array of neighborhood styles and designs, from historic bungalows to mid-century ranch neighborhoods. Consistent with the City's General Plan, development has focused on infill opportunities and been limited to low-lying areas of the City to maintain undeveloped hillsides, which has created a contiguous urbanized area with defined natural edges.

3.1.1.2 Visual Character of the Project Vicinity

The Project site consists of mostly undeveloped land located in the unincorporated County, directly adjacent to the southwestern City boundary and within the City's Sphere of Influence (SOI). The site is surrounded to the north, east, and south with urban development. To the south, four multi-story hotels and surface parking lots are clustered amongst sparse ornamental landscaping. To the east, several low-lying automobile dealerships and service centers are connected by surface parking lots and Los Osos Valley Road (LOVR). To the north, the Irish Hills Plaza is a regional-serving retail plaza anchored



The Project site (foreground) is characterized by grazing land in the lower elevations against a backdrop of dramatic hillsides within the Irish Hills Natural Reserve.

by large retail stores (e.g., Home Depot, Costco, Whole Foods, TJ Maxx) and connected with surface parking lots. The Project site is effectively surrounded on three sides by urban development. However, the vicinity to the west and southwest is largely undeveloped. Development in this area is limited primarily to Mountainbrook Church, a single-story, approximately 35-foot-tall complex atop a small rise to the southwest of the site. This mixture of developed land and natural and/or agricultural areas is characteristic of the City's interface with unincorporated areas when urban development transitions into rural settings.

The Irish Hills Natural Reserve is located immediately west of the Project site and provides a dramatic natural backdrop to open space and agricultural lands in the County and urban development in the City. The Irish Hills rise over 1,000 feet above the Project site to the north and west. The mountainous topography is covered with extensive chaparral habitat, oak woodland, and native grasslands and can be seen from area roadways, residential communities, and other parks and open space within the City and County. The Irish Hills are highly visible from the Project site and adjacent areas, including from roadways providing local and regional access.

The Project site is bordered to the east by LOVR and U.S. 101. LOVR in the Project vicinity is a four-lane road with on-road bike lanes on both sides and sidewalks on the east side only. LOVR is designated as having medium to high scenic value in the City's General Plan (City of San Luis Obispo 2006; 2017). The LOVR Overpass interchange extends over U.S. 101 for approximately 1,000 feet. The City General Plan Circulation Element (CE) designates this portion of the roadway as having a high scenic value. Substantial views of the Project site and Irish Hills, as well as surrounding mountains to the north and northwest, are available from the elevated roadway. The southeastern portion of the site is bordered



Views of the Irish Hills and the undeveloped areas of the Project site are available from the LOVR Overpass, with foreground views of riparian willow woodland associated with the Calle Joaquin wetlands and the LOVR ditch. The Project site visually transitions the City's urban edge to the natural setting of the Irish Hills Natural Reserve and unincorporated agricultural lands.

by Calle Joaquin, a two-lane road running generally north-south from LOVR and parallel to U.S. 101. Calle Joaquin provides sidewalks with median landscaping along both sides of the roadway, but no bicycle facilities are provided. This roadway is not designated as having scenic value by the General Plan CE, though views of the Irish Hills and surrounding undeveloped agricultural land are available across the Project site.

3.1.1.3 Visual Condition of the Project Site

There are several important visual resources that contribute to the scenic quality of the Project site. The 116.8-acre Project site is largely undeveloped and visually transitions the urban development of the City to the undeveloped, natural settings in the unincorporated area and the Irish Hills. The Project site has three distinct visual characters depending on location, including lower elevations, upper elevations, and the Froom Ranch Dairy complex.

The site's lower undeveloped elevations are characterized by low rolling slopes. The site is gently sloping from the base of the Irish Hills to LOVR. This area provides grazing land for horses and also contains the 3.2-acre stormwater detention basin, which is a low-lying earthen structure and frequently vegetated with wetland plants (see also, Section 3.4, *Biological Resources*). Otherwise, vegetation onsite is sparse within the lower elevations and consists primarily of grasslands; however, portions of these grasslands have been recently graded. Based on visual observations and review of aerial photography in 2018 and 2019 by the EIR consultant, approximately 8 acres of the site is routinely graded and shaped into a berm on the downslope side of Froom Creek. Grasslands appear to reemerge



Froom Creek flows from the Irish Hills through the Project site. Most of the creek is a seasonally dry channel lined with rock and cobble with earthen banks and no riparian vegetation. The lower elevations of the Project site support grassland and the Calle Joaquin wetlands, which provide broad natural views within the Project site.

when no grading occurs, but these construction activities periodically degrade the natural visual setting of this portion of the site.

At the site's southeast corner, the Calle Joaquin wetlands provide rich vegetation and ponding for surface waters at the site's lowest elevations. Along LOVR, intermittent willow woodlands along the LOVR ditch generally screen and block views of the site from LOVR and the commercial areas to the east. The lower elevations of the site are generally separated from the upper elevations by Froom Creek, which cuts across the site at the base of the Irish Hills, forming a natural boundary between the hillside areas to the west and the lowland grazing areas to the east. Froom Creek is a seasonally dry channel lined with rocks and cobble with earthen banks and no riparian vegetation within the Specific Plan area. Outside of the Specific Plan area in the proposed stormwater detention basin area, Froom Creek transitions into a dense riparian corridor that flows downslope of open grasslands downslope of Mountainbrook Church.

Approximately 7.5 acres in the northwestern area of the site is developed with the Froom Ranch Dairy complex (an onsite historic district) and a 5.5-acre permitted quarry with a construction storage yard. The historic Froom Ranch Dairy complex comprises seven buildings remaining from the former dairy operations onsite, four of which have been determined to be individually eligible as significant historic resources. The buildings are one-story, wooden structures, and only two are painted with neutral tones. Other non-historic structures associated with the complex include an outhouse, a shed, and a cellular service tower disguised like a turn-of-the-century water tower (see Section 3.5, *Cultural and Tribal Cultural Resources*). The complex is clearly visible from within the Project site, from the adjacent Irish Hills Plaza parking lots, and from trails within the Irish Hills Natural

Reserve, including the Froom Creek Connector Trail. The complex is only partially visible from LOVR near the entrance to the Project site where views are less obstructed by riparian vegetation and development within the Irish Hills Plaza, and is also visible from the atop Overpass. Immediately behind the complex, the gravel extraction quarry equipment/materials and storage areas lie adjacent to Froom Creek at



The northwestern area of the Project site is developed with the Froom Ranch Dairy complex and existing quarry and construction storage area, which is visible from public trails in the Irish Hills Natural Reserve.

the base of the Irish Hills. While there are no permanent structures in the quarry, stockpiles of soil, gravel, and construction debris/rubble are commonly seen onsite along with uncovered construction materials (e.g., pipe, conduit). The quarry is set on a level terrace tucked near Froom Creek and is less visible from within the site and from the Irish Hills Plaza; however, trail users have clear views of the quarry from the Froom Creek Connector Trail and the trailhead to the Irish Hills Natural Reserve trail system, which lies immediately behind the Project site to the west.



The southwestern area of the Project site contains diverse natural communities within drainages and woodland areas in the Upper Terrace of the Project site. This area is highly visible to trail users within the Irish Hills Natural Reserve.

The Upper Terrace has varied topography and rock outcroppings that provide visual interest. Vegetation in the Upper Terrace is richer and more varied, providing mature trees, riparian corridors, natural drainages, and often wildflower-filled open grasslands. The Upper Terrace's visual qualities blend seamlessly with those of the Irish Hills. The Irish Hills topographic forms are a dominant background view to the west. The Upper Terrace is also highly visible to trail users within the Irish Hills Natural Reserve trail system, including Neil Havlik Way and the Johnson Ranch Trail.

3.1.1.4 Scenic Resources

Scenic Vistas

A scenic vista is generally defined as a highquality view displaying good aesthetic and compositional values that can be seen from public viewpoints. The term "vista" generally implies an expansive view, usually from an elevated point or open area. The City General Plan Conservation and Open Space Element (COSE) has designated a scenic vista overlooking the Upper Terrace of the Project site (City of San Luis Obispo 2006).¹ This



The City's COSE of the General Plan designates a scenic vista overlooking the Project site from the Filipponi Ranch and Johnson Ranch Trail in the Irish Hills Natural Reserve. Source: hikespeak.com

¹ The COSE identifies cones of view in Figure 11: Scenic Roadways and Vistas.

designated vista is located 0.35 mile southwest of the Project site near Filipponi Ranch, uphill from the Upper Terrace and behind Mountainbrook Church. This public vista is accessible from the Froom Ranchto-Johnson Ranch Trail Connector Trail and the Filipponi Ranch Trail in the Irish Hills Natural Reserve and affords sweeping views over the City to the east and northeast, including background views of Cerro San Luis and Bishop Peak. In the foreground, the Upper Terrace is visible from this vista with mid-range views of the lower elevations of the site, including the proposed stormwater detention basin area. The Project site is not visible from any other City-designated scenic vista.

The Project site is visible from other public areas and overlooks, including the Irish Hills Natural Reserve. Over 10 miles of public trails within the Irish Hills Natural Reserve offer broad public views across the Project site to the east. Existing foreground views from the Irish Hills Natural Reserve trail system include undeveloped lands of the Project site as well as adjacent developed areas (e.g., Irish Hills Plaza, Mountainbrook Church). Background views include the hills and mountain ranges in the greater San Luis Obispo area. The most clear and persistent views of the Project site are available along nearly 2 miles of the following public trails; these trails comprise a popular intermediate









Views from the trails in the Irish Hills Natural Reserve provide sweeping views across the Project site to the east. Pictured here, Neil Havlik Way and the Froom Creek Connector Trail provide a public scenic vista east toward mountains, hillsides, and open space intermittently interrupted by low density development. Source: hikespeak.com

hiking-only loop in the Irish Hills with a trailhead immediately adjacent to the existing onsite quarry:

- Froom Creek Connector Trail is a 0.5-mile trail that provides clear views of the Project site's northwestern corner, including existing views of the Froom Ranch Dairy complex and quarry in the foreground and lower elevation grazing lands in the background. Midrange views include low-lying commercial development along LOVR, such as Irish Hills Plaza, against a background of distant mountains and open sky. Views include activities associated with Irish Hills Plaza at Costco, Home Depot, TJ Max, and Home Depot for loading dock activities, which include maneuvering, idling, and offloading of heavy commercial distribution trucks, trucks passing through the alley, operation of forklifts, parking for passenger vehicles, equipment storage, and trash storage and pickup.
- Neil Havlik Way is a 0.5-mile trail that circumvents the hillside above the Project site. Over 180-degree views are available from this trail segment capturing most of the Project site in the foreground. Irish Hills Plaza is plainly visible to the northeast, as described above. Views to the east and southeast include a band of commercial development and roadways, but is otherwise largely undeveloped and natural with background views of mountains and open sky.
- *Ocean View Trail* is a 2.9-mile trail that runs above the Upper Terrace of the Project site and affords users clear views of the upper and lower elevations of the Project site with views of Mountainbrook Church in the mid-range view. Views from this trail are largely undeveloped and natural with background views of mountains and open sky.
- *Filipponi Ranch Trail* is a 1.0-mile trail connecting Calle Joaquin to the Johnson Ranch Trail in the Irish Hills Natural Reserve, providing the southernmost entry point to the Reserve. This trail also provides access to the City's designated scenic vista overlooking the southern area of the City, including the Project site. This trail provides scenic views of the Project vicinity and surrounding area, including Mountainbrook Church, the Project site, and ample views of the surrounding mountains and open space to the east and south. U.S. 101 and commercial and residential areas are also visible from this trail, although they comprise a minor portion of the viewshed.

Regionally, the Project site is marginally visible from elevated locations, such as upper elevation trails in Laguna Lake Park Open Space and Bishop Peak, but clear views are highly limited by distance and intervening topography, vegetation, and development in the region. Views of the Project site from identified key viewing areas are further described below in Section 3.1.3.2, *Impact Assessment Methodology*.

Scenic Roadways and Highways

The Project site is visible from local public roads, including clear views from LOVR and Calle Joaquin adjacent to the site. Distant and intermittent views are also available from U.S. 101 primarily for southbound travelers. As further described below, U.S. 101 is eligible for designation as a State Scenic Highway in this area and identified as having high scenic value in the General Plan COSE. LOVR is locally designated as a roadway with moderate to high scenic value adjacent to the Project site. Calle Joaquin is not designated as a scenic roadway.

Local Roadways

LOVR is a public roadway that carries vehicles, bicyclists, and pedestrians along the eastern edge of the Project site for approximately 2,000 feet. Views of the Irish Hills Natural Reserve to the west from LOVR are contrasted against urban development, including commercial land uses and roadway infrastructure to the east. While the Irish Hills are visible in the background, views toward the Project site from LOVR are mostly obstructed by thick willow riparian vegetation in the LOVR ditch that runs along the roadway. Unobstructed views of the Project site from LOVR are available for a 250-footlong break in this vegetation from Auto Park Way to the site's existing driveway. Driver views of the Project site last approximately two seconds. This view captures a wide expanse of the site, including low-lying grasslands in the foreground, the Froom Ranch Dairy complex and Froom Creek in the mid-range view, and a background view of the natural hillsides of the Irish Hills Natural Reserve. To the north, the loading areas of Irish Hills Plaza are also visible. Another 100-foot-long break in the roadside vegetation exists closer to Calle Joaquin across from the Toyota of San Luis Obispo dealership. Limited views are available at this point toward the Irish Hills Natural Reserve, but the scenic quality is limited and obstructed by onsite vegetation (e.g., palm tree cluster). LOVR is designated by the City as having moderate scenic values along the 2,000 feet of frontage with the Project site. The visual qualities of the Project site are most visible for southbound travelers looking west toward the site through breaks in roadside vegetation. High quality views are therefore intermittent and varying along the Project frontages.



Views along LOVR (southbound) afford a combination of low-lying urban development to the east and natural open views to the west across the Project site. Source: Google 2019.

Approximately 300 feet south of the Project site, the LOVR Overpass (over U.S. 101) provides elevated views over the Project site for approximately 2.2 seconds. The LOVR Overpass is designated by the City as having high scenic value. The visual qualities of the Project site are most available from the LOVR Overpass for northbound travelers looking west. While most views to the Project site from the LOVR Overpass are obstructed by existing multi-story hotels on Calle Joaquin, including the four-story Hampton Suites, a clear view of the Project site, including the Upper Terrace and the Irish Hills Natural Reserve, is available for approximately 300 feet as the LOVR Overpass descends to LOVR. This view captures the Upper Terrace, lower elevation grasslands, and distant views of the Froom Ranch Dairy complex. Northbound travelers on this portion of the LOVR Overpass experience panoramic views of the Project site. Given a speed limit of 35 miles per hour (mph) and assuming average roadway speeds of 20 mph, drivers along this roadway experience views of the Project site for less than one minute. Pedestrians traveling across the overpass at 3 mph would experience these views for approximately four minutes.

Calle Joaquin is not a designated scenic roadway, but clear views of the Project site are available for westbound travelers. Substantially unobstructed foreground views of adjacent wetlands and grazing lands with a backdrop of natural hillsides and ridgelines are available from this roadway.

State Highways

The California Scenic Highway Program, maintained by the California Department of Transportation (Caltrans), protects State Scenic Highway corridors from changes that would diminish the aesthetic value of lands adjacent to highways. According to the California State Scenic Highway Program, the section of U.S. 101 in the Project vicinity is eligible for State Scenic Highway designation but is not officially designated (Caltrans 2017). The City's General Plan CE identifies this segment of U.S. 101 as having high scenic value (City of San Luis Obispo 2014).

U.S. 101 runs northeast-southwest, passing to the south of the Project site before continuing north into the City and south into the County. Partial views of hillsides within the Project site and Irish Hills mountainous ridgelines are available in the distance from southbound U.S. 101 along an approximate 0.5-mile segment. Passing the Project site from the north, drivers experience broad views of open space near the Project site as they leave the City, although direct views of the Project site are nominal due to existing development, vegetation, and surrounding topography.

3.1.1.5 Light and Glare

The Project site does not currently contain sources of light or glare that affect nighttime views in the area. Existing operations of the construction business operations are not illuminated at night and onsite lighting is limited to minor interior light sources. The Project site and Irish Hills to the west do not contribute to nighttime lighting or daytime glare. In contrast, nighttime lighting from businesses and roadways in the Project vicinity is substantial and characteristic of the commercial urban area. Nighttime lighting conditions to the north, east, and south of the Project site including outdoor security lights, lighted signage, and interior lights that spill outdoors through large commercial windows. The site is surrounded on three sides by commercial development, including highly illuminated hotels to the south, Irish Hills Plaza to the north, and automobile dealerships to the east. LOVR and Calle Joaquin are not illuminated with street lights.

3.1.2 Regulatory Setting

There are no federal regulations that pertain to aesthetic or visual resources related to the Project. State and local regulations that are directly relevant to the Project are summarized below.

3.1.2.1 State

Caltrans Scenic Highway Program

Caltrans defines a scenic highway as any freeway, highway, road, or other public right-of-way that traverses an area of exceptional scenic quality. Suitability for designation as a State Scenic Highway is based on vividness, intactness, and unity. As discussed previously, U.S. 101, located approximately 0.45 mile west of the Project site, is eligible for State Scenic Highway designation; however, it is not currently designated as a State Scenic Highway. The City's General Plan CE designates U.S. 101 as having high scenic value.

3.1.2.2 Local

City of San Luis Obispo General Plan

The City's General Plan Land Use Element (LUE) contains policies to ensure that new development is compatible with existing surrounding visual character. The General Plan CE contains policies to ensure new development does not obstruct views from scenic roads or highways. The COSE includes policies to protect open space and minimize visual impacts on surrounding natural landscape and to protect views and scenic vistas. Pertinent policies from these elements are listed below.

Land Use Element

Policy LU 1.4 Urban Edges Character. The City shall maintain a clear boundary between San Luis Obispo's urban development and surrounding open land. Development just inside the boundary shall provide measures to avoid a stark-appearing edge between buildings in the City and adjacent open land. Such measures may include: using new or existing groves or windrows of trees, or hills or other landforms, to set the edge of development; increasing the required side-yard and rear-yard setbacks; and providing open space or agricultural transition buffers.

Policy LU 1.8.1 Open Space Protection. Within the City's planning area and outside the Urban Reserve Line (URL), undeveloped land should be kept open. Prime agricultural land, productive agricultural land, and potentially productive agricultural land shall be protected for farming. Scenic lands, sensitive wildlife habitat, and undeveloped prime agricultural land shall be permanently protected as open space.

Policy LU 2.3.7 Natural Features. The City shall require residential developments to preserve and incorporate as amenities natural site features, such as land forms, views, creeks, wetlands, wildlife habitats, wildlife corridors, and plants.

Policy LU 2.3.8 Parking. The City shall discourage the development of large parking lots and require parking lots be screened from street views. In general, parking should not be located between buildings and public streets.

Policy LU 2.3.10 Site Constraints. The City shall require new residential developments to respect site constraints such as property size and shape, ground slope, access, creeks and wetlands, wildlife habitats, wildlife corridors, native vegetation, and significant trees.

Policy LU 2.3.11 Residential Project Objectives. Residential projects should provide:

- A Privacy, for occupants and neighbors of the project;
- **B** Adequate usable outdoor area, sheltered from noise and prevailing winds, and oriented to receive light and sunshine;
- C Use of natural ventilation, sunlight, and shade to make indoor and outdoor spaces comfortable with minimum mechanical support;
- **D** Pleasant views from and toward the project;
- E Security and safety;
- F Bicycle facilities consistent with the City's Bicycle Plan;
- **G** Adequate parking and storage space;
- H Noise and visual separation from adjacent roads and commercial uses (Barrier walls, isolating a project, are not desirable. Noise mitigation walls may be used only when there is no practicable alternative. Where walls are used, they should help create an attractive pedestrian, residential setting through features such as setbacks, changes in alignment, detail and texture, places for people to walk through them at regular intervals, and planting.)
- I Design elements that facilitate neighborhood interaction, such as front porches, front yards along streets, and entryways facing public walkways;
- **J** Buffers from hazardous materials transport routes, as recommended by the City Fire Department.

Policy LU 6.4 Hillside Policies. As noted in the Open Space section of the COSE, San Luis Obispo wants to keep open its steeper, higher, and most visible hillsides. Some of the lower and less steep hillside areas, however, are seen as suitable for development, particularly where development is coupled with permanent open space protection of the more sensitive areas.

- **Policy LU 6.4.7 Hillside Planning Areas.** The City shall urge the County to implement the following hillside policies. Specific policies to address particular concerns for the areas as shown in LUE Figure 7 are listed below. For each of these areas, land above the development limit line should be secured as permanent open space.
 - **H.** The Irish Hills area should be secured permanent open space with no building sites above the 150-foot elevation, in conjunction with any subdivision or development of the lower areas.
- **Policy LU 8.1.1 Specific Plan/General Plan Amendment.** The City shall require the completion and approval of a specific plan and associated General Plan Amendment prior to annexation (if applicable) and development of land within an area designated as a

Specific Plan Area on LUE Figure 10. The required General Plan Amendment will modify the General Plan Land Use Diagram to reflect the land use diagram from the approved specific plan, based on the land uses listed under "Performance Standards" for each site.

The Project site is designated on LUE Figure 10 as a designated Specific Plan site, SP-3 Madonna on LOVR.

Circulation Element

Policy 15.1.2 Development along Scenic Routes. The City will preserve and improve views of important scenic resources form streets and roads. Development along scenic roadways should not block views or detract from the quality of views.

- **A** Projects, including signs, in the viewshed of a scenic roadway should be considered as "sensitive" and require architectural review.
- **B** Development projects should not wall-off scenic roadways and block views.
- C As part of the City's environmental review process, blocking of views along scenic roadways should be considered a significant environmental impact.
- **D** Signs along scenic roadways should not clutter vistas or views.
- E Street lights should be low scale and focus light at intersections where it is most needed. Tall light standards should be avoided. Street lighting should be integrated with other street furniture at locations where views are least disturbed. However, safety priorities should remain superior to scenic concerns.
- **F** Lighting along scenic roadways should not degrade the nighttime visual environment and night sky per the City's Night Sky Preservation Ordinance.

Policy 15.1.3 Public Equipment and Facilities. The City and other agencies should be encouraged to avoid cluttering scenic roadways with utility and circulation-related equipment and facilities.

- **A** Whenever possible, signs in the public right-of-way should be consolidated on a single low-profile standard;
- **B** Public utilities along scenic highways should be installed underground;
- C The placement of landscaping and street trees should not block views from Scenic Routes. Clustering of street trees along scenic roadways should be considered as an alternative to uniform spacing; and
- **D** Traffic signals with long mast arms should be discouraged along scenic roadways.

Conservation and Open Space Element

Policy COS 8.3.2 Open Space Buffers. Buffers shall be required in the following situations:

- A Between urban development -- including parks and public facilities -- and natural habitats such as creeks, wetlands, hillsides and ridgelines, Morros, scenic rock outcrops and other significant geological features, and grassland communities, to address noise, lighting, storm runoff, spread of invasive, non-native species, and access by people and pets.
- **B** Between urban development and agricultural operations, to address dust, noise, odors, chemical use, and access by people and pets.
- C Between new development and scenic resources or the greenbelt, to address view blockage, lighting and noise, and visual transition from urban character to rural character.
- D Urban development or uses located adjacent to the Urban Reserve Line to provide a transition to open space or greenbelt areas. Transition areas should add to the preservation of open space lands or resources. At a minimum, a 50-foot transition area (preserved in essentially a natural state) shall be provided within the project along the project boundary with the Urban Reserve Line, unless the transition area is defined elsewhere in this Element.

Policy COS 9.1.1 Preserve Natural and Agricultural Landscapes - B. Any development that is permitted in natural or agricultural landscapes shall be visually subordinate to and compatible with the landscape features. Such development shall:

- 1) Avoid visually prominent locations such as ridgelines, and slopes exceeding 20 percent.
- 2) Avoid unnecessary grading, vegetation removal, and site lighting.
- 3) Incorporate building forms, architectural materials, and landscaping that respect the setting, including the historical pattern of development in similar settings, and avoid stark contrasts with its setting.
- 4) Preserve scenic or unique landforms, significant trees in terms of size, age, species or rarity, and rock outcroppings.

Policy COS 9.1.2 Urban Development. Urban development should reflect its architectural context. This does not necessarily prescribe a specific style, but requires deliberate design choices that acknowledge human scale, natural site features, and

neighboring urban development, and that are compatible with historical and architectural resources. Plans for sub-areas of the City may require certain architectural styles.

Policy COS 9.1.3 Utilities and Signs. In and near public streets, plazas and parks, features that clutter, degrade, intrude on, or obstruct views should be avoided. Necessary features, such as utility and communication equipment, and traffic equipment and signs should be designed and placed so as to not impinge upon or degrade scenic views of the Morros or surrounding hillsides, or farmland, consistent with the primary objective of safety. New billboard signs shall not be allowed, and existing billboard signs shall be removed as soon as practicable, as provided in the Sign Regulations.

Policy COS 9.1.4 Streetscapes and Major Roadways. In the acquisition, design, construction or significant modification of major roadways (highways/regional routes and arterial streets), the City will promote the creation of "streetscapes" and linear scenic parkways or corridors that promote the City's visual quality and character, enhance adjacent uses and integrate roadways with surrounding districts.

Policy COS 9.1.5 View Protection in New Development. The City will include in all environmental review and carefully consider effects of new development, streets, and road construction on views and visual quality by applying the Community Design Guidelines, height restrictions, hillside standards, Historical Preservation Program Guidelines, and the California Environmental Quality Act and Guidelines.

Policy COS 9.2.1 Views To and From Public Places, Including Scenic Roadways. The City will preserve and improve views of important scenic resources from public places and encourage other agencies with jurisdiction to do so. Public places include parks, plazas, the grounds of civic buildings, streets and roads, and publicly accessible open space.

- 1) Development projects shall not wall-off scenic roadways and block views.
- 2) Utilities, traffic signals, and public and private signs and lights shall not intrude on or clutter views, consistent with safety needs.
- 3) Where important vistas of distant landscape features occur along streets, street trees shall be clustered to facilitate viewing of the distant features.
- 4) Development projects, including signs, in the viewshed of a scenic roadway shall be considered "sensitive" and require architectural review.

Policy COS 9.2.2 Views To and From Private Development. Projects should incorporate as amenities views from and within private development sites. Private development designs

should cause the least view blockage for neighboring property that allows project objectives to be met.

Policy COS 9.2.3 Outdoor Lighting. Outdoor lighting shall avoid: operating at unnecessary locations, levels, and times; spillage to areas not needing or wanting illumination; glare (intense line-of-site contrast); and frequencies (colors) that interfere with astronomical viewing.

Policy COS 9.3.6 View blockage Along Scenic Highways. Determine that view blockage along scenic roadways is a significant impact.

City of San Luis Obispo Zoning Ordinance

The Zoning Ordinance of the City's Municipal Code was developed in conformance with the General Plan(City of San Luis Obispo 2019). Zoning is intended to promote and enforce broad General Plan policies related to land use, physical development, and construction. The following Zoning Ordinance policies are related to the visual impact of lighting.

17.70.100 Lighting and Night Sky Preservation. Establishes lighting regulations that encourage lighting practices and systems that will:

- a. Permit reasonable uses of outdoor lighting for nighttime safety, utility, security, and enjoyment while preserving the ambience of night;
- b. Curtail and reverse any degradation of the nighttime visual environment and the night sky;
- c. Minimize glare and obtrusive light by limiting outdoor lighting that is misdirected, excessive, or unnecessary;
- d. Help protect the natural environment from the damaging effects of night lighting; and
- e. Meet the minimum requirements of the California Code of Regulations for Outdoor Lighting and Signs (Title 24, Chapter 6).

City of San Luis Obispo Community Design Guidelines

The City's Community Design Guidelines were developed to communicate the City's expectations relating to the quality and character of site and building design. Many of the guidelines specifically target the reduction of visual impacts and the promotion of visual harmony with surrounding context (City of San Luis Obispo 2010). The following subjects are relevant to this Project analysis.

Chapter 3 – Commercial and Industrial Project Designs

Chapter 3 includes guidelines relating to the massing, scale, form, style, and design of commercial and industrial use buildings to promote the visual and architectural compatibility of new development with existing and proposed surrounding structures.

Chapter 5 – Residential Project Design

Chapter 5 includes guidelines relating to the goals for residential project design, subdivision design and general residential project principles, infill development, multifamily and clustered housing design, and single-family housing design, all of which apply to this Project. Qualities examined include protection of scenic roadways; visually pleasing parking design and location; consideration of neighboring development; quality landscaping and lighting; and site-specific building design.

Chapter 6 – Site Planning and Other Design Details

Chapter 6 details qualities such as energy and resource conservation, lighting, storage, trash/recycling enclosures, landscaping, parking, and public art, among other items.

Chapter 7 – Special Design Considerations

This section of the City's Design Guidelines focuses on creekside and hillside development, as well as preservation of historic resources. Guidelines for creekside development outline the City's expectations concerning necessary setbacks from creek banks and the maintenance of public visual access to scenic creeks and corridors. Guidelines for hillside development outline the importance of preserving the natural character of hillsides through expectations concerning the height of buildings, grading and development on steep slopes, installation of fencing and landscaping, and exterior lighting. Requirements for the preservation of historic and cultural resources are administered by the City's Cultural Heritage Committee (CHC) and the guidelines adopted in the City Municipal Code for architectural review.

3.1.3 Environmental Impact Analysis

3.1.3.1 Thresholds of Significance

As specified in the CEQA Guidelines, the Project would result in a significant impact to aesthetics if it would:

a) Have a substantial adverse effect on a scenic vista;

- b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, open space, and historic buildings within a designated scenic local or State Scenic Highway;
- c) Substantially degrade the existing visual character or quality of public views of the site and its surroundings; or
- d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

3.1.3.2 Impact Assessment Methodology

The City's General Plan policies provide definitions of physical attributes that are considered potential important visual resources. These include:

- Open space, (LUE Policy 1.13.8 Open Space);
- Natural site features such as landforms, views, creeks (LUE Policy 2.3.7 Natural Features;
- Scenic hillside areas and natural features such as the volcanic Morros, ridge lines, plant communities, rock outcroppings and steep slope areas that function as landscape backdrops for the community (LUE Policy 6.4.1 Hillside Policies);
- Hillside planning areas that contribute to the City's scenic setting (LUE Policy 6.4.2 Development Limits);
- Preserve natural and agricultural landscapes (COSE Policy 9.1.1);
- Preserve nighttime views and prevent light pollution (COSE Policy 9.1.6 Night-sky preservation)

Adopted City General Plan policies require that the Project must consider potential loss of open space, minimize aesthetic impacts, and remain compatible with nearby visual resources.

Analysis of visual impacts of the Project includes fieldwork and visual reconnaissance of the Project site, notes and photographs of existing visual resources (e.g., trees, buildings, and view corridors), analysis of the Project site's relationship to the surrounding community, and the City's existing policy framework for protecting visual resources. Visual reconnaissance of the Project site and surrounding areas was conducted by Wood Environment & Infrastructure Solutions on December 19, 2017, January 9, 2018, January 18, 2018, and April 25, 2019. Field notes and photographs of existing visual resources of

the Project site and vicinity are used to support this analysis. This information was utilized to identify important visual resources present on the Project site and in the vicinity.

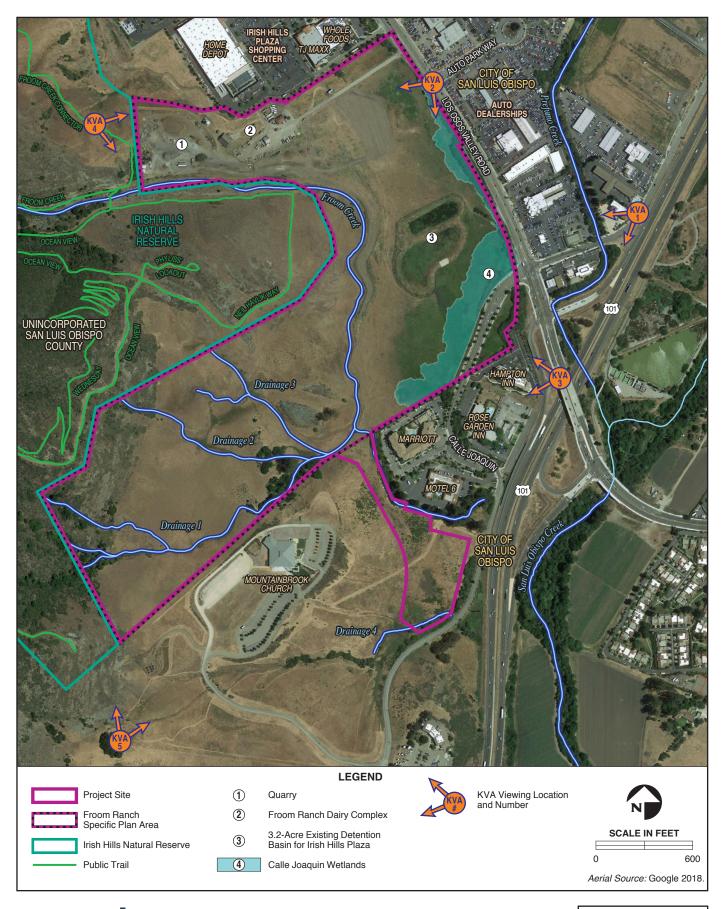
Scenic Vistas and Scenic Resources

The view impact assessment depends upon the sensitivity of the resource, as supported by public testimony, viewer susceptibility, viewing conditions (e.g., angle of view, distance, and primary viewing directions), degree of change and visual contrasts to surroundings. These could include a change to existing features that no longer appear characteristic of the area or development that substantially or entirely blocks public scenic views or removes key aesthetic features. This analysis focuses on changes to public views. Impacts to private views are not considered under CEQA (Pub. Res. Code Section 21082.2). Public views include local- and state-designated scenic roadways or highways and public vantages, including LOVR, U.S. 101, and the public open space within the Irish Hills Natural Reserve. This analysis considers the field of view for different viewers; drivers and cyclists on local roadways are generally forward-facing in the direction of the traffic flow, whereas pedestrians and hikers are able to perceive views in any direction. This analysis also considers the different expectations of viewers; drivers and cyclists on roadways may be occupied with travel mechanics, other vehicles, and the immediate vicinity, whereas pedestrians, hikers, and mountain bikers may seek aesthetic relief as part of recreational activity.

Visual Character

The analysis of visual character and quality focuses on whether development of the Project would substantially degrade the existing visual character of the Project site or vicinity. Considerations include potential visual contrast and/or the compatibility of scale and character of future development to existing visual conditions.

Because assessment of aesthetics is inherently subjective, concerns raised by the public during the scoping process were considered. To evaluate potential Project-related impacts to visual resources, Key Viewing Areas (KVAs) were identified and factors such as overall changes to visual character were considered. KVAs were selected based on representative locations from which the Project would be clearly seen from public locations in the Project vicinity (Figure 3.1-1). The KVA analysis focuses on changes from existing conditions as they would be experienced by motorists, bicyclists, and pedestrians from the public realm. KVAs are then reviewed in the context of the Draft FRSP, architectural renderings, a 3D



wood.

KVA Locations

FIGURE 3.1-1

model of the Project and elevations which are used for visual simulations of the Project for each KVA to determine whether the Project may substantially degrade or conflict with the existing visual character of the site and Project vicinity. The KVA existing setting photographs are compared to Project visual simulations prepared by the EIR consultant. The KVA visual simulations include topographic changes based on proposed grading plans, structures location, and parameters based on the Draft FRSP (Appendix C) and the draft Vesting Tentative Tract Map (VTTM), and landscaping based on conceptual landscape plans. As detailed architectural design and landscaping details are not available at this time, the visual simulations are conceptual and subject to change; however, the depiction of bulk, scale, and size of the Project is considered accurate for the purposes of impact analysis. Existing KVA visual characteristics are compared to computer-based visual simulations of the Project in Section 3.1.3.3, *Project Impacts and Mitigation Measures*.

The following KVAs were selected for analysis (refer to Figure 3.1-1 for KVA locations). The analysis focuses on changes from existing conditions as they would be experienced by viewers from adjacent public locations, including roadways and the Irish Hills Natural Reserve. To the extent feasible, this assessment quantifies the potential changes to visual resources (i.e., building heights, setbacks, and distances). However, aesthetic impacts are also addressed qualitatively where quantification was determined to be unavailable and/or inaccurate. The changes to visual character are also discussed in the context of major pending public and private developments within the Project vicinity.

KVA 1: U.S. 101 southbound looking southwest

This KVA represents one of the only views of the Project site looking southwest from a southbound lane of the U.S. 101. This KVA was selected because it provides a channelized view of the Project site, including open space located above the 150-foot elevation line.





The Project site is generally not visible from U.S. 101. Intervening development and vegetation obscure views toward the site for both southbound (left) and northbound (right) drivers. One channelized view along Calle Joaquin affords a clear view of the site for southbound drivers looking southwest and this view is the basis of KVA 1. Source: Google Earth 2019.

Additionally, this KVA depicts the natural habitat present on the foothills of the Irish Hills. Views of the Project site from U.S. 101 are generally blocked by intervening development and vegetation. This segment of U.S. 101 is identified as having high scenic value in the General Plan COSE.

KVA 2: LOVR looking west

This KVA represents views of the eastern boundary of the Project site from LOVR. This KVA was selected because it provides a view of the existing onsite open space and the Irish Hills to the west of the Project site. This KVA is identified as having high or moderate scenic value in the General Plan COSE and affords views of the existing roadside vegetation that currently limits views of the Project site from this location.

KVA 3: LOVR Overpass looking northwest

This KVA represents views of the Project site looking northwest from the LOVR Overpass. This KVA was selected because it is highly traveled and provides a view of the Project site and Irish Hills backdrop. The LOVR Overpass is identified as having high scenic value in the General Plan COSE. Additionally, this KVA depicts screening resulting from existing roadway vegetation.

KVA 4: Froom Creek Connector Trail looking east

This KVA represents east-facing views of the Project site from the Froom Creek Connector Trail. This KVA was selected because it provides a clear view of the existing historic buildings, construction company operations, and open space currently located on the Project site, along with distant views of mountains and ridgelines.

KVA 5: Mountainbrook Trail looking northeast

This KVA represents views looking northeast from the Irish Hills over the Upper Terrace toward the lower elevations of the site along LOVR. This KVA was selected because it provides a view of the existing open space and adjacent land uses experienced from upper elevation trails in the Irish Hills Natural Reserve. This KVA also represents the view from a location identified in the General Plan COSE as a scenic vista.

Light and Glare

The analysis of light/glare impacts reviews the new light/glare sources that would be introduced under the Project and determines whether light/glare would substantially affect

views in the Project vicinity. A key element in this assessment methodology involves consideration of the existing light/glare standards in the City's Zoning Ordinance.

3.1.3.3 Project Impacts and Mitigation Measures

The Project would result in the following visual impacts. Table 3.1-1 below provides a summary of these impacts.

Table 3.1-1. Summary of Project Impacts

Aesthetics and Visual Resources Impacts	Mitigation Measures	Residual Significance
VIS-1. Project implementation would change views of scenic resources, including hillsides, rock outcroppings, open space, and historic buildings, from an eligible State Scenic Highway or local scenic roadway.	MM VIS-1	Less than Significant with Mitigation
VIS-2. The Project 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	Significant and Unavoidable
VIS-3. The Project would introduce a new source of nighttime light, impacting the quality of the nighttime sky and increasing ambient light.	None	Less than Significant

Impact VIS-1 Project implementation would change views of scenic resources, including hillsides, rock outcroppings, open space, and historic buildings, from an eligible State Scenic Highway or local scenic roadway (Less than Significant with Mitigation).

The Project site is visible from several public roadways in the Project vicinity, including U.S. 101, LOVR, and Calle Joaquin. There are no designated State Scenic Highways in the Project vicinity; however, U.S. 101 through the City has been identified as eligible for designation as a State Scenic Highway. U.S. 101 and LOVR are designated scenic roadways by the City's COSE. Development of the Project may change, degrade, eliminate, or block public views of visual resources onsite and in the Irish Hills, including hillsides, rock outcroppings, the historic Froom Ranch Dairy complex, and vegetation, for drivers, pedestrians, and bicyclists, as further analyzed below.

U.S. 101

The segment of U.S. 101 in the Project vicinity is eligible for State Scenic Highway designation, but not currently designated (Caltrans 2017). The City's COSE identifies this

segment of U.S. 101 as having high scenic value (City of San Luis Obispo 2014). Views toward the Project site are generally blocked by commercial development, vegetation, distance, and topography, but the quality of views change depending on the driver's travel direction, as described below. The Froom Ranch Dairy complex is not substantially visible from U.S. 101 (refer to KVA 1).



KVA 1: Fleeting distant views of the Project site are available from U.S. 101, including the Upper Terrace channelized along Calle Joaquin (pictured). This KVA affords direct views to the Irish Hills, including ridgelines, outcroppings, and natural vegetation, but is obstructed by commercial development and street trees up to approximately 20 to 30 feet high, as well as telephone poles and wiring. The Project would result in the loss or obstruction of these scenic resources in the mid-range view with development of multi-story development, but would not obstruct existing background views of the Irish Hills ridgelines and hillsides and would be consistent with adjacent multi-story development in the vicinity that is also visible from U.S. 101.



The Project site is not clearly visible for northbound drivers as U.S. 101 is angled eastward away from the Project along this segment and northbound views toward the site are blocked by topography, vegetation, and existing commercial development (e.g., four multi-story hotels on Calle Joaquin, mature eucalyptus trees). Northbound drivers may catch glimpses of the Upper Terrace for a moment near the LOVR exit ramp, but the view corridor would pass quickly given high vehicle speeds on U.S. 101 and would be behind the forward-facing viewers. Therefore, changes to views from northbound U.S. 101 would not be substantial. The Project would also not eliminate or change northbound views of scenic resources, such as Irish Hills ridgelines, outcroppings, and vegetation. Therefore, development of the Project site would not substantially change visible scenic resources for northbound drivers on U.S. 101.

Views of the Project site for southbound drivers are also largely obstructed by intervening development, vegetation, and topography; however, the angle of U.S. 101 directs southbound drivers toward the southern portions of the Project, which increases the availability of channelized views that would change under the Project. There are no clear, open, and/or long-lasting views of the Project site for southbound drivers. KVA 1 was selected for analysis as it is one of the only views of the Project site available from U.S. 101. Otherwise, the Project would not be substantially visible to southbound drivers on U.S. 101. KVA 1 models the potential change to a channelized view from U.S. 101. This KVA affords southbound drivers a momentary glimpse of the Upper Terrace of the Project site from southbound U.S. 101. From this KVA, the Project would result in development of the Upper Terrace with dense, multi-story development, including a centrally located building with substantial bulk. This development would be elevated above other existing proximate development within the City (i.e., above 150 feet in elevation). The Project would eliminate open space and vegetation within the Upper Terrace and would partially block existing views of open hillsides in the Irish Hills from KVA 1. However, this visual change would not be substantial for drivers on U.S. 101 considering the high speed of traffic and the lower sensitivity of the driver to visual change. Pedestrians and cyclists are not allowed on U.S. 101 and would not be affected by Project changes to the visual setting on the site. Since there are no open or long-lasting views that would be affected by the Project and visible impacts would be limited to momentary glimpses of the Project in the mid-range along a channelized view lined with trees and existing development and utility infrastructure, the impact on views from southbound U.S. 101 would not be substantial. The Project would not eliminate or change southbound views of scenic resources, such as Irish Hills ridgelines, outcroppings, and vegetation. Therefore, development of the Project

site would not substantially change visible scenic resources for southbound drivers on U.S. 101.

Understanding that the U.S. 101 is designated as having a high scenic value, the Project would not substantially affect scenic resources visible for southbound or northbound drivers on U.S. 101.

LOVR and LOVR Overpass

As discussed in Section 3.1.1.2, *Visual Character of the Project Vicinity*, the City's COSE designates LOVR as having moderate to high scenic value and the LOVR Overpass as having high scenic value. The Project would be visible to travelers along LOVR, but the impact of development onsite would vary along the LOVR corridor.

Views from LOVR along the 2,000-foot-long Project site frontage have moderate visual resource value due to the developed nature of this corridor. The four-lane-wide roadway is lined to the east by commercial development, including automobile dealerships and service centers that include expansive surface parking lots, security lighting, bulky low-lying buildings, and highly visible signage with little to no landscaping or streetscape. To the west, views of the Project site capture upper elevations of the Irish Hills, including ridgelines, outcroppings, and vegetation, as well as distant glimpses of the Froom Ranch Dairy complex, but most of the foreground and mid-range views of the site are block by thick willow riparian vegetation along the roadside in the LOVR ditch, as depicted by KVA 2 below. Clear views across the site toward scenic resources are only available through two limited breaks in this vegetation: a 250-foot-long break at Auto Park Way, and a 100-foot-long break at the base of the LOVR Overpass. Views of the Upper Terrace are not clearly available from LOVR. With this segment of LOVR lined by vegetation to the west and commercial development to the east, views to the north and south are channelized along the roadway.

Views of the Project site from the LOVR Overpass are available for northbound drivers, pedestrians, and cyclists, as depicted in KVA 3 below. Because the LOVR Overpass is elevated, views overlook the lower elevations of the Project site, including open grasslands and the Froom Ranch Dairy complex in the mid-range view. The view has a clear backdrop of the Irish Hills ridgelines, outcroppings, and vegetation. However, the view is limited to a view corridor between existing development, including multi-story hotel buildings and commercial development along LOVR, and is currently obstructed by thick willow riparian vegetation lining the Project site along Calle Joaquin.



KVA 2: The Project site is visually obscured behind dense willow riparian vegetation of 15 to 20 feet in height along most of the LOVR frontage (see left side of photo). Intermittent breaks in the vegetation provide brief views of onsite visual resources including open space and grazing lands in the middle ground and the Irish Hills in the background. Clear views of the site are available at Auto Park Way (pictured), where the proposed main entrance of the Project would be constructed, and capture distant views of Irish Hills Plaza and the Froom Ranch Dairy complex. Motorists, cyclists, and pedestrians along this roadway experience views of scenic resources, though the duration of this view is limited by traffic speed and volumes that require focusing on roadway activities. While background views of the Irish Hills would remain following construction, multi-story development would eliminate onsite scenic resources. However, in context of surrounding commercial development, the Project would be consistent in character, size, and scale. Further, the Project would remove the thick vegetation in the LOVR ditch currently providing visual screening of the Project site.



Project implementation would change the view from LOVR and the LOVR Overpass by developing the Project site, which would be visible during construction and operation. Construction would occur over a five-year period and involve grading and structural development. During this time, viewers would see construction equipment, materials, and activities, as well as loss of onsite vegetation, including the existing willow riparian vegetation sustained in the LOVR ditch and potentially along Calle Joaquin.² The loss of this existing visual shielding would expose viewers to areas of the site not currently visible from LOVR. As the loss of the vegetation in the LOVR ditch would occur early in the Project (Phase 1) during site grading and relocation of Froom Creek, construction activities

² It appears the existing vegetation along the Project site boundary would be removed to facilitate installation of the proposed stormwater management system. See Section 2.0, *Project Description* for details. The Draft FRSP does not include a detailed landscaping plan but this EIR presumes a combination of native and ornamental plantings along the site boundary.

would be visible for the full construction duration from both LOVR and the LOVR Overpass.

Once occupied, the Project would result in the permanent loss of the open space and grasslands currently visible from limited portions of LOVR and the LOVR Overpass, as modeled by KVA 2 and KVA 3. Existing mid-range open space views would be converted to dense multi-story development that would also extend up to the base of the Irish Hills Natural Reserve hillside. Project buildout would remove riparian vegetation in the foreground along LOVR while structures up to 55 feet in height would replace open space and agricultural grazing land in the mid-range view. The Draft FRSP ([Section 5.7.2[d]) identifies conceptual ornamental landscaping "where practical" and streetscape



KVA 3: Views of the Project site from the LOVR Overpass are mostly blocked by vegetation and the existing multi-story hotels in the foreground. This KVA affords an open view of the Project, including distant views of the Irish Hills, the Froom Ranch Dairy complex, and Irish Hills Plaza. The Project would also reduce access to mid-range and distant visual resources, but would not obstruct existing views to the Irish Hills and would be consistent with multi-story development in the vicinity.



landscaping would include street and parkway trees to form "the canopy, provide shade, introduce seasonal color, and define the street edge (Section 6.7.4[f]). None of these conceptual landscaping design standards specifically address screening of proposed structures to reduce the visual impact of massing as experienced by the viewer on LOVR and the LOVR Overpass. Further, two-story structures would obstruct background views of the base of Irish Hills but would maintain views of ridgelines and outcroppings. Distant views of the Froom Ranch Dairy complex would be blocked by new development, though these buildings are not highly visible from the KVAs and most public viewing locations. While views of key scenic resources, including ridgelines, outcroppings, and vegetated open space, would remain, there would be a permanent loss of views toward the Froom Ranch Dairy complex both in its current location and in its proposed new location lower in elevation within the proposed onsite public park. Based on KVA 2 and KVA 3 analysis, the Project would be a dominant feature within these public views and loss of vegetation along the Project site boundary would expose viewers to substantial changes to scenic resources within the site.

As most of the existing views of the Project site from LOVR and the LOVR Overpass are currently obstructed by multi-story development or thick vegetation, the Project would only result in a substantial change to existing views from LOVR and the LOVR Overpass in limited places, including KVA 2 and KVA 3. With the loss of vegetation, mid-range views of the Project site would become urbanized similar to adjacent development in Irish Hills Plaza or the existing hotels on Calle Joaquin. However, while mid-range views would change, views of scenic resources, including the Irish Hills ridgelines and outcroppings, would remain. Further, considering different travel speeds, drivers along the stretch of LOVR would experience views of the developed Project site for approximately one minute and pedestrians traveling across the overpass would experience these views for approximately four minutes.

The Project would not eliminate or change views of scenic resources, such as Irish Hills ridgelines, outcroppings, and vegetation, and the loss of views of the Froom Ranch Dairy complex in the background would not be substantially perceptible. Even though the Project's impacts would be limited to development in the mid-range that would not obscure important scenic resources, the impact on views from LOVR and the LOVR Overpass would be substantial due to the potential loss of vegetation currently providing visual shielding for the Project site, as well as the loss of distant views of the Froom Ranch Dairy complex. Because LOVR and the LOVR Overpass are considered scenic roadways by the

City and the Project would expose viewers to a replacement of open space and vegetation with urban development, the impact to scenic resources would be *potentially significant*.

Calle Joaquin

The portion of Calle Joaquin extending to the west of LOVR towards the Project site is a small, two-lane road that leads to adjacent hotels, Mountainbrook Church, a television broadcasting station, and the Filipponi Ranch. This 1-mile long roadway experiences low levels of traffic and is visually impeded for a long portion of the roadway by one- to four-story hotel buildings. While views of scenic resources may be affected by Project implementation from Calle Joaquin, Calle Joaquin is not a designated scenic roadway and receives little use compared to LOVR and U.S. 101; therefore, the potential for the Project to adversely affect a substantial number of public viewers is low and impacts to views of scenic resources from Calle Joaquin would be *less than significant*.

Mitigation Measures

- MM VIS-1 The Draft Froom Ranch Specific Plan shall be revised to include the following Landscape Screening Guidelines to provide effective screening of proposed structural massing as experienced from public views along LOVR and the LOVR Overpass. The Project landscape plan shall be prepared by a qualified landscape architect and include the following:
 - 1. Maximize protection of existing vegetation along the Project site boundary to provide visual screening during Project construction and operation.
 - 4.2.Retain existing vegetation fronting the Project site along LOVR to the greatest extent feasible to screen construction activities.
 - 2.3. Specify a plant palette and landscape plan that ensure a vegetated site boundary of sufficient height and density to provide visual screening of the proposed development from public views. Robust riparian planting shall be included in landscape plans to achieve visual screening along the proposed realigned Froom Creek.
 - 3.4. Native tree specimens and shrubs capable of reaching or exceeding the heights of the adjacent proposed structures shall be planted along Project site boundaries visible from public views.

- 4.5. Screening planting specimen selection and location shall emphasize the ability to interrupt the contiguous massing of structures as experienced from area roadways and scenic vistas. Spacing shall be sufficient to minimize views of structures within the Project site.
- 5.6. Screening planting specimen selection shall emphasize the ability of planting species to effectively establish and thrive over the life of the Project, such that smaller sizes shall be considered rather than exclusively larger box sizes. Planting establishment rates shall be considered but shall not preclude the use of slower-growing species, such as coast valley oak and willows.
- 6.7. Native tree specimens capable of reaching or exceeding the heights of adjacent structures shall be planted adjacent to multi-family and commercial structures located within the interior of the Specific Plan area consistent with the specifications above.
- 7.8. A bond for screening landscaping and irrigation shall be provided to ensure establishment of plantings. The bond shall be revoked upon satisfactory establishment of screen planting vegetation according to the plan.

Requirements and Timing. The Specific Plan Landscape Screening Guidelines and landscape bond shall be reviewed and approved by the City Community Development Department prior to vesting tract map recordation. Landscape plantings, including irrigation, outside of building sites shall be in place prior to issuance of building permits for each phase of the Project. Landscape plantings, including irrigation, within building sites shall be in place prior to occupancy for each phase. A landscape architect approved by the City shall provide verification of landscaping establishment pursuant to the Screening Plan to the City's Community Development Department for review and approval prior to relinquishment of the bond.

Monitoring. The City Community Development Department shall review and approve the Specific Plan Landscape Screening Guidelines. The Applicant shall ensure that all landscape planting and irrigation are in place and shall prepare a memo verifying condition compliance. The City

Community Development Department shall review and approve the landscaping establishment bond letter.

Residual Impacts

Implementation of MM VIS-1 would reduce scenic resource impacts caused by the proposed development's structural massing as experienced from adjacent public roadways and ensure that affected views retain vegetation that provides a similar level of screening to the existing setting. As views of scenic resources would be maintained from adjacent public roads and the proposed development would be sufficiently shielded by proposed vegetation, impacts to scenic resources would be *less than significant with mitigation*.

Impact VIS-2 The Project 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 (Significant and Unavoidable).

The Project would facilitate development of up to 174 multi-family residences, 404 senior housing units and assisted living facilities and amenities in association with the Villaggio Life Plan Community, commercial development, developed urban parks, roads, bicycle paths, and other urban infrastructure. The Project would conserve 59 acres of open space primarily in the Upper Terrace of the Project site within the Irish Hills and would relocate and rehabilitate four historic structures in the Froom Ranch Dairy complex. The proposed development would transition the Project site from predominantly open space and grazing uses to dense multi-story development creating a continuous swath of urban development at the base of the Irish Hills Natural Reserve. While the scale and style of the Project would be generally visually compatible with surrounding commercial development to the south, east, and north, development of the 116.8-acre site would substantially change the visual character of the area from the loss of open space and vegetation, particularly as viewed from hillsides in the Irish Hills. The Project would also transition the Froom Ranch Dairy complex to a public park setting surrounded by multi-family residential development. This change in character would be substantial and development would be highly visible from several public trails within the Irish Hills Natural Reserve, including the Froom Creek Connector, Neil Havlik Way, and Ocean View trails, as well as the existing designated vista located 0.35 mile southwest of the Project site near Filipponi Ranch, uphill from the Upper Terrace and behind Mountainbrook Church. Development of the Upper Terrace of Villaggio and upper elevations of Madonna Froom Ranch would cause the most dramatic change to site character on the Project site's highly visible hillsides.

The visual character of the Project, including the architectural style, height, bulk, scale, and landscaping would be generally consistent with architectural styles and scale of adjacent commercial development in the Irish Hills Plaza to the north, the four multi-story hotels to the south, Mountainbrook Church to the southwest, and the automobile dealerships and service centers to the east. The Draft FRSP includes conceptual architectural styles and requires architectural character of future development to be compatible with the setting of the Project site. The Project design guidelines establish standards to allow for the modern interpretation of common San Luis Obispo styles, including Ranch, Craftsman, Mediterranean, and California Mission. Each area of the Project would have a mix of styles, with one or two dominant, to provide architectural interest that contributes to the respective community character. The design guidelines also provide standards for scale, mass, color, and other features to maintain an appropriate balance between variability and consistency within neighborhoods. Building facades would be fully articulated, and architecturally compatible treatments would be used throughout development to ensure transitions between different areas of the Project.

The Project Design Guidelines for residential and commercial architectural design aim to adhere to the policies in the City's LUCE Update. Such policies include Policy LU 1.4, Urban Edges, which requires development to maintain a clear boundary between urban development and undeveloped open space; and Policy COS 2.3.7, Natural Features, which requires residential developments to preserve natural site features such as vegetation and ridgelines, as described in Impact VIS-1. The Lower Area of Villaggio is an infill area surrounded on three sides by fully developed urban areas and does not extend up the hillside above 150 feet in elevation. Senior residences, health care facilities, and the Commons in the Lower Area would be as tall as 45 feet and feature a 55-foot tower providing for a library, guest rooms, and observation deck. Non-habitable space appurtenances, towers, and utilities would be allowed to extend an additional 10 feet above the maximum building height. While development of the Lower Area would eliminate open grazing lands that are also highly visible from the Irish Hills Natural Reserve, the development would occur in visual context with the Irish Hills Plaza, the four multi-story hotels, and automobile dealerships and service centers. In this context, development of the Lower Area would be visually compatible with surrounding development and would not substantially change the character of the area, including for viewers within the Irish Hills Natural Reserve. Development within the Lower Area would also be set back from LOVR and Calle Joaquin by approximately 300 feet to accommodate the Calle Joaquin wetlands and realigned Froom Creek channel, which would maintain a portion of the site with

existing vegetation and open space as a visual buffer. The proposed architectural and landscape design guidelines would help ensure Project development integrates with the natural setting of the site against the Irish Hills, including limiting the height of structures to 55 feet and providing vegetation to screen new development.

However, the Project's proposed land use plan and conceptual design (refer to Figures 2-3 and 2-4) indicate that development is not contained wholly within infill areas. The Project would include substantial development above 150 feet in elevation within the Upper Terrace and portions of Madonna Froom Ranch and place urban development in visual context with the undeveloped Irish Hills Natural Reserve. The Upper Terrace would contain 108 total units within several three-story buildings and up to 31 single-story villas. Within Madonna Froom Ranch, approximately 3 acres of multi-family residential development would occur above 150 feet in elevation within the site. These structures would be built above the 150-foot elevation line and would further extend in height above 150 feet in elevation. While open space maintained in the Upper Terrace would buffer proposed development from the Project site boundary with the Irish Hills Natural Reserve, the visual result of this development would intrude into or obstruct views of the Irish Hills Natural Reserve natural open spaces. The Upper Terrace and the upper elevations of Madonna Froom Ranch are highly visible from public trails in the Irish Hills Natural Reserve and the Project would eliminate onsite natural features (e.g., grasslands, trees) that contribute to the visual quality of these hillsides.

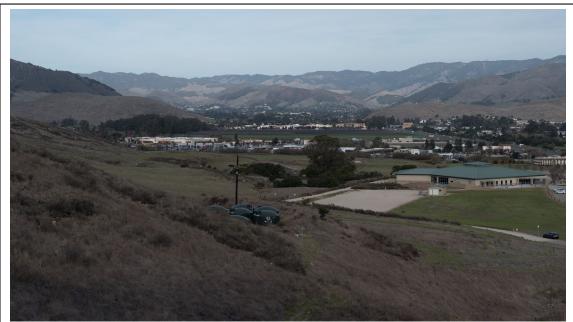
The Project site is highly visible from public trails along the southeastern edge of the Irish Hills Natural Reserve. This includes Project site visibility along the entirety of Neil Havlik Way, the Ocean View Trail and a majority of the Froom Creek Connector Trail. The Irish Hills Natural Reserve offers premier hiking trails and scenic vistas in the region, as well as trails for equestrians and mountain bikers. These visitors would be exposed to the Project for substantial durations, with hikers being exposed for over 20 minutes traversing the ridgelines above the Project site on foot. Given several popular trail segments would be exposed to the Project, and that recreationalists are visiting the Reserve for a natural setting, viewer exposure and sensitivity is high. Project development would substantially change views experienced by visitors on trails within the adjacent Irish Hills Natural Reserve. High quality views of visual resources within the Project site, a high level of exposure of viewers on trails, and high viewer expectations characterize the Project site as highly susceptible to visual impacts. The visual impacts of the Project from the Irish Hills Natural Reserve are represented in KVA 4 and KVA 5.

As depicted by KVA 4, the Madonna Froom Ranch development would be highly visible from the Froom Creek Connector Trail, which is a key multi-use trail to the Froom Creek Trailhead, which lies directly west of the Project site. While activities associated with Irish Hills Plaza such as fuel stations and loading docks are present, the existing character of the view faces urban development from a rural setting. The Project site can be viewed as natural buffer between commercial and urban development within the City and the natural landscapes of the Irish Hills. Residential and commercial buildings would replace the existing quarry with dense development and would reach a maximum height of 35 and 45 feet, respectively. Development would also relocate and encase the Froom Ranch Dairy complex, which is highly visible from this KVA, in residential development. The current background of open lands and Froom Creek in its current location would be replaced with



KVA 4: Views of existing historic structures, business operations, and open space within the Project site are unobstructed. Adjacent commercial land uses are also clearly visible from this KVA. The Project would be highly visible from this portion of the Froom Creek Connector Trail, though development would not directly impede views of surrounding landscapes.





KVA 5: Views of the open space currently existing onsite are provided from this location, as well as adjacent land uses. Views also include the Santa Lucia Mountains to the north, South Hills to the east, as well as expansive views of agricultural developments in the region. Development of the Project would be highly visible from this KVA, though it would not directly impede views of the Irish Hills Natural Reserve or surrounding hillsides from this trail.



urban development. Froom Creek would also be realigned to flow east through the proposed development and would not be clearly visible from the Froom Creek Trail. The proposed buildings would dominate southeastern mid-range views for approximately 1,700 feet along this trail. Assuming a hiking rate of 2 mph, hikers would experience sustained views of the Project for at least 10 minutes. The obstruction of view corridors over the

Project site and modification of existing structures would be considered a significant impact on visual resources.

KVA 5 captures a view of the Upper Terrace of the Project site and, as such, demonstrates visual impacts of Project development for trail segments overlooking the Upper Terrace, including the Ocean View Trail, the Mountainbrook Trail, and Neil Havlik Way. While the overall height of this Project component would be similar in scale to adjacent Mountainbrook Church, Delevelopment of the Upper Terrace would be highly visible and extensive to hikers looking northeast from this KVA. Project buildout would remove extensive open space and natural habitat area and permanently interrupt the visual continuity of the Irish Hills in this area. Impacts to these important visual resources as experienced from these trails would be significant.

Although adherence to City policies and regulation, as well as the architectural and landscape design guidelines, would ensure compatibility of the Project with surrounding commercial development, the Project would be a stark contrast to the agricultural pasture and historic structures currently onsite. Additionally, the Upper Terrace area and portions of the Madonna Froom Ranch area would be developed above the 150-foot elevation line and would be the only development above this line in the vicinity besides Mountainbrook Church. Further, analysis of both visual susceptibility and visual severity of Project impacts indicates a high potential for substantial impacts to the visual character of the site, including public perception from the Irish Hills Natural Reserve. As depicted by KVA 4 and KVA 5, the Project site would be extremely visible and would replace existing scenic views of grazing land and riparian habitat. Recreationalists currently expect scenic views of highquality natural habitats, and development of the Project would negatively impact these resources. The Project design and style would be compatible with adjacent development in the Lower Area, but because the Project would substantially degrade the visual quality of the site's hillsides and upper elevations, aesthetic impacts would be considered *potentially* significant.

Mitigation Measures

MM VIS-1 would apply.

Residual Impacts

MM VIS-1 would interrupt the contiguous massing of proposed multi-family and commercial structures by requiring onsite native tree screening plantings. No additional

feasible mitigation measures are available to minimize the conversion of the Project site's rural setting to a commercial and residential setting. While MM VIS-1 would reduce aesthetic impacts of the proposed structural massing as experienced from public trails, this measure would not sufficiently reduce the substantial adverse effect on scenic resources resulting from loss of open space and natural visual setting as experienced from these trails. As no other feasible measures are available, impacts to visual resources would be *significant and unavoidable*.

Impact VIS-3 The Project would introduce a new source of nighttime light, impacting the quality of the nighttime sky and increasing ambient light (Less than Significant).

Development of the Project site would alter current lighting conditions by increasing the amount of exterior lighting fixtures and light produced on the Project site. These new sources of light may be visible from public areas, including the Irish Hills Natural Reserve and LOVR. However, light from surrounding land uses already dominates the night sky and the Project would not substantially contribute to an increase in this existing condition. Therefore, the Project would not result in substantial impacts to nighttime views of the area for viewers to the north, south, and east. Nighttime views for recreationalists along the Irish Hills Natural Reserve trail system could potentially be impacted by the increase in lighting sources resulting from the Project, though the Reserve closes at sunset each day and, therefore, effects would be limited. Any views from the Irish Hills that would be affected by Project night lighting would also be affected by existing commercial and security lights from adjacent automobile dealerships, the Irish Hills Plaza, and the four multi-story hotels. Further, light pollution from the Project would be regulated by outdoor lighting standards consistent with the City's Night Sky Preservation Ordinance and Community Design Guidelines (see Section 2.4.2, *Project Design*).

The Project would also increase non-stationary source lighting resulting from increases in local vehicle trips and traffic volumes. As discussed in Section 3.13, *Transportation and Traffic*, the Project would result in a notable increase in PM trips or traffic, which would increase the amount of headlight glare along local roadways, particularly along LOVR. However, LOVR and other local roadways already carry nighttime traffic and Project contributions would not be substantial from a lighting perspective. Additionally, there are no immediately adjacent residential uses that may be affected by increased nighttime light or glare. Commercial uses generally close in the evening and are less sensitive to nighttime lighting. Existing vegetative screens or physical barriers also exist along many adjacent

arterials that reduce nighttime glare from adjacent roadways, reducing potential adverse impacts on visual resources from increased headlight glare. Because the Project's night lighting would comply with the City's Night Sky Preservation Ordinance and Community Design Guidelines and would not affect substantial residential or recreational viewers, Project impacts would be *less than significant*.

3.1.3.4 Cumulative Impacts

The Project, in combination with approved, pending, and proposed development in the City, would contribute toward creating a defined transition from the rural environment towards the south of the City to the urban environment to the north of the City. Consistent with long-term buildout under the General Plan, the Project and cumulative projects would be required to adhere to the design standards of the City General Plan, Community Design Guidelines, and City Building Standards and would be subject to discretionary review by the Community Development Director, Architectural Review Commission (ARC), and Planning Commission. As concluded by the LUCE Update EIR, all development that adheres to the LUCE policies would result in less than significant impacts. However, the Project would require development above the 150-foot elevation line and would require a General Plan Amendment of Policy LU 6.4, Hillside Policies (see also, Section 3.9, Land Use and Planning), and would obstruct scenic views of open spaces from the City and Irish Hills Natural Reserve. The Project, in conjunction with other cumulative development occurring within the City and URL on or adjacent to undeveloped lands would have significant cumulative impacts on visual resources and the natural and open space visual character along the City's urban-rural fringe. MM VIS-1 would not be sufficient to reduce the Project's long-term contribution to cumulative impacts on aesthetic resources; therefore, impacts would be *significant and unavoidable*.