



slo

2035 

LAND USE &
CIRCULATION
UPDATE

VOLUME IV
APPENDICES E-J

EIR TECHNICAL
STUDIES

JUNE 2014



Please see the next page.

slo

2035

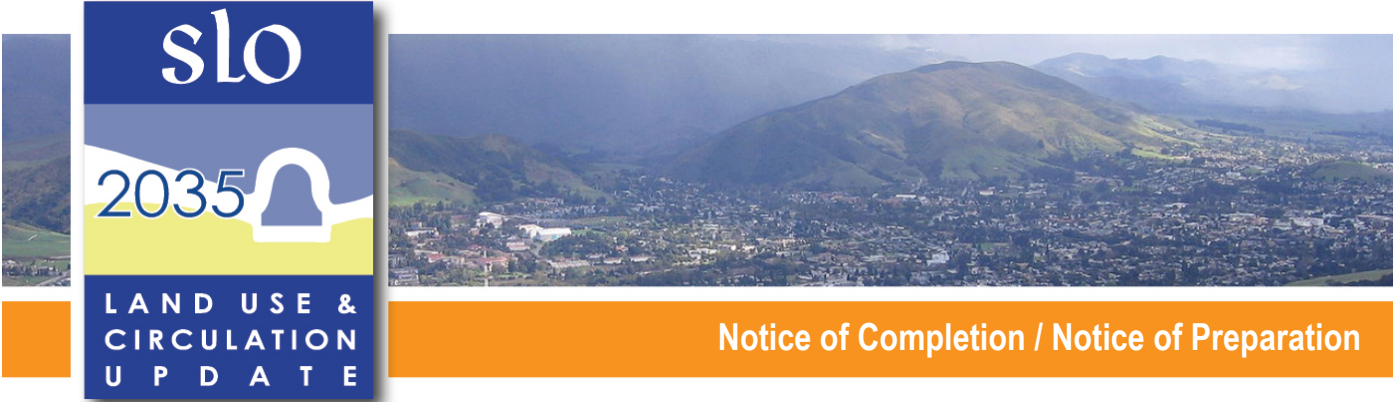


LAND USE &
CIRCULATION
UPDATE



APPENDIX E: NOP AND RESPONSES

Please see the next page.



Please see the next page

Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613
For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH # 2013121019

Project Title: City of San Luis Obispo General Plan Land Use and Circulation Elements Update

Lead Agency: City of San Luis Obispo Contact Person: Kim Murry
Mailing Address: 919 Palm Street Phone: 805-781-7274
City: San Luis Obispo Zip: 93401 County: San Luis Obispo

Project Location: County: San Luis Obispo City/Nearest Community: San Luis Obispo
Cross Streets: NA (Project is a City-wide update to the General Plan) Zip Code: 93401
Longitude/Latitude (degrees, minutes and seconds): Section: Twp.: Range: Base:
Assessor's Parcel No.: Within 2 Miles: State Hwy #: 101 and 1 Waterways: San Luis Creek, Chorro Creek
Airports: San Luis Obispo Airport Railways: UPRR Schools: SLOCUSD

Document Type:

CEQA: [X] NOP [] Draft EIR NEPA: [] NOI Other: [] Joint Document
[] Early Cons [] Supplement/Subsequent EIR [] EA [] Final Document
[] Neg Dec (Prior SCH No.) [] Draft EIS [] Other:
[] Mit Neg Dec Other:

RECEIVED

Local Action Type:

[X] General Plan Update [] Specific Plan [] Rezone [] Annexation
[] General Plan Amendment [] Master Plan [] Prezone [] Redevelopment
[] General Plan Element [] Planned Unit Development [] Use Permit [] Coastal Permit
[] Community Plan [] Site Plan [] Land Use Change [] Other:

DEC 05 2013

STATE CLEARINGHOUSE

Development Type:

[] Residential: Units Acres
[] Office: Sq.ft. Acres Employees
[] Commercial: Sq.ft. Acres Employees
[] Industrial: Sq.ft. Acres Employees
[] Educational:
[] Recreational:
[] Water Facilities: Type MGD
[] Transportation: Type
[] Mining: Mineral
[] Power: Type MW
[] Waste Treatment: Type MGD
[] Hazardous Waste: Type
[X] Other: No physical development proposed.

Project Issues Discussed in Document:

[X] Aesthetic/Visual [] Fiscal [X] Recreation/Parks [X] Vegetation
[X] Agricultural Land [X] Flood Plain/Flooding [] Schools/Universities [X] Water Quality
[X] Air Quality [] Forest Land/Fire Hazard [] Septic Systems [X] Water Supply/Groundwater
[X] Archeological/Historical [X] Geologic/Seismic [X] Sewer Capacity [X] Wetland/Riparian
[X] Biological Resources [] Minerals [X] Soil Erosion/Compaction/Grading [X] Growth Inducement
[] Coastal Zone [X] Noise [X] Solid Waste [X] Land Use
[X] Drainage/Absorption [X] Population/Housing Balance [X] Toxic/Hazardous [X] Cumulative Effects
[] Economic/Jobs [X] Public Services/Facilities [X] Traffic/Circulation [X] Other: Climate Change

Present Land Use/Zoning/General Plan Designation:

Project will revise and update existing Land Use Policy and address physical changes proposed within City limits.

Project Description: (please use a separate page if necessary)

The proposed project is an update to the City's Land Use and Circulation Elements. The Land Use Element designates the general location and intensity of housing, business, industry, open space, education, public buildings and facilities, and other land uses. It helps guide neighborhood preservation, revitalization, and enhancement and protects environmental resources. The Circulation Element includes goals and policies relating to how residents, products and visitors move around San Luis Obispo. This element addresses cars, bicycles, pedestrians, air, rail, and public transportation. As part of the update, small changes in the definition of the zoning designations are expected and specific sites will be evaluated for changes to the current designations. See the project NOP for a detailed project description and environmental issues to be analyzed in the EIR.

Note: The State Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in.

Reviewing Agencies Checklist

Lead Agencies may recommend State Clearinghouse distribution by marking agencies below with and "X".
If you have already sent your document to the agency please denote that with an "S".

- | | |
|---|--|
| <input checked="" type="checkbox"/> Air Resources Board | <input type="checkbox"/> Office of Historic Preservation |
| <input type="checkbox"/> Boating & Waterways, Department of | <input type="checkbox"/> Office of Public School Construction |
| <input type="checkbox"/> California Emergency Management Agency | <input checked="" type="checkbox"/> Parks & Recreation, Department of |
| <input type="checkbox"/> California Highway Patrol | <input type="checkbox"/> Pesticide Regulation, Department of |
| <input checked="" type="checkbox"/> Caltrans District #5 | <input type="checkbox"/> Public Utilities Commission |
| <input type="checkbox"/> Caltrans Division of Aeronautics | <input type="checkbox"/> Regional WQCB # _____ |
| <input checked="" type="checkbox"/> Caltrans Planning | <input type="checkbox"/> Resources Agency |
| <input type="checkbox"/> Central Valley Flood Protection Board | <input type="checkbox"/> Resources Recycling and Recovery, Department of |
| <input type="checkbox"/> Coachella Valley Mtns. Conservancy | <input type="checkbox"/> S.F. Bay Conservation & Development Comm. |
| <input type="checkbox"/> Coastal Commission | <input type="checkbox"/> San Gabriel & Lower L.A. Rivers & Mtns. Conservancy |
| <input type="checkbox"/> Colorado River Board | <input type="checkbox"/> San Joaquin River Conservancy |
| <input type="checkbox"/> Conservation, Department of | <input type="checkbox"/> Santa Monica Mtns. Conservancy |
| <input type="checkbox"/> Corrections, Department of | <input type="checkbox"/> State Lands Commission |
| <input type="checkbox"/> Delta Protection Commission | <input type="checkbox"/> SWRCB: Clean Water Grants |
| <input type="checkbox"/> Education, Department of | <input type="checkbox"/> SWRCB: Water Quality |
| <input type="checkbox"/> Energy Commission | <input type="checkbox"/> SWRCB: Water Rights |
| <input checked="" type="checkbox"/> Fish & Game Region #4 | <input type="checkbox"/> Tahoe Regional Planning Agency |
| <input type="checkbox"/> Food & Agriculture, Department of | <input checked="" type="checkbox"/> Toxic Substances Control, Department of |
| <input type="checkbox"/> Forestry and Fire Protection, Department of | <input type="checkbox"/> Water Resources, Department of |
| <input type="checkbox"/> General Services, Department of | <input type="checkbox"/> Other: _____ |
| <input type="checkbox"/> Health Services, Department of | <input type="checkbox"/> Other: _____ |
| <input checked="" type="checkbox"/> Housing & Community Development | |
| <input checked="" type="checkbox"/> Native American Heritage Commission | |

Local Public Review Period (to be filled in by lead agency)

Starting Date December 6, 2013 Ending Date January 10, 2014

Lead Agency (Complete if applicable):

Consulting Firm: <u>Matrix Design Group, Inc.</u>	Applicant: _____
Address: <u>7844 Madison Ave., Suite 111</u>	Address: _____
City/State/Zip: <u>Fair Oaks, CA 95628</u>	City/State/Zip: _____
Contact: <u>Rick Rust</u>	Phone: _____
Phone: <u>916-537-0026</u>	

Signature of Lead Agency Representative: *mm mung* **Date:** 12/2/13

Authority cited: Section 21083, Public Resources Code. Reference: Section 21161, Public Resources Code.



Edmund G. Brown Jr.
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Ken Alex
Director

Notice of Preparation

December 5, 2013

To: Reviewing Agencies
Re: General Plan Land Use and Circulation Elements Update
SCH# 2013121019

Attached for your review and comment is the Notice of Preparation (NOP) for the General Plan Land Use and Circulation Elements Update draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

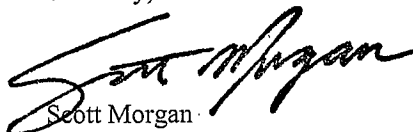
Please direct your comments to:

Kim Murry
City of San Luis Obispo
919 Palm Street
San Luis Obispo, CA 93401

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,



Scott Morgan
Director, State Clearinghouse

Attachments
cc: Lead Agency

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
TEL (916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

**Document Details Report
State Clearinghouse Data Base**

SCH# 2013121019
Project Title General Plan Land Use and Circulation Elements Update
Lead Agency San Luis Obispo, City of

Type Neg Negative Declaration
Description The Proposed project is an update to the City's Land Use and Circulation Elements. The Land use Element designates the general location and intensity of housing, business, industry, open space, education, public buildings and facilities, and other land uses. It helps guide neighborhood preservation, revitalization, and enhancement and protects environmental resources. The Circulation Element includes goals and policies relating to how residents, products and visitors move around San Luis Obispo. This element addresses cars, bicycles, pedestrians, air, rail, and public transportation. As part of the update, small changes in the definition of the zoning designations are expected and specific sites will be evaluated for changes to the current designations.

Lead Agency Contact

Name Kim Murry
Agency City of San Luis Obispo
Phone (805) 781-7274 **Fax**
email
Address 919 Palm Street
City San Luis Obispo **State** CA **Zip** 93401

Project Location

County San Luis Obispo
City San Luis Obispo
Region
Cross Streets
Lat / Long
Parcel No.
Township

Range	Section	Base
-------	---------	------

Proximity to:

Highways Hwy 101 & 1
Airports San Luis Obispo
Railways UPRR
Waterways San Luis Creek, Chorro Creek
Schools SLOCUSD
Land Use Project will revise and update existing Land Use Policy and address physical changes proposed within City limits.

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Flood Plain/Flooding; Geologic/Seismic; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Growth Inducing; Landuse; Cumulative Effects; Other Issues

Reviewing Agencies Resources Agency; Department of Conservation; Cal Fire; Department of Parks and Recreation; Department of Water Resources; Department of Fish and Wildlife, Region 4; Native American Heritage Commission; Public Utilities Commission; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 5; Air Resources Board; Air Resources Board, Transportation Projects; Regional Water Quality Control Board, Region 3

Date Received 12/05/2013 **Start of Review** 12/05/2013 **End of Review** 01/03/2014



**CITY OF SAN LUIS OBISPO
2035 LAND USE AND
CIRCULATION ELEMENT
UPDATE**

City of San Luis Obispo
NOTICE OF PREPARATION

DATE: December 4, 2013

TO: State Clearinghouse,
Concerned Agencies,
Interested Parties

FROM: City of San Luis Obispo
Community Development Department
919 Palm Street
San Luis Obispo, CA 93401

**SUBJECT: NOTICE OF PREPARATION OF A PROGRAMMATIC ENVIRONMENTAL
IMPACT REPORT (EIR)**

PROJECT TITLE: General Plan Land Use and Circulation Elements Update

LEAD AGENCY: City of San Luis Obispo, Community Development Department

RESPONSES DUE BY: January 10, 2014

The City of San Luis Obispo (City) will be the Lead Agency and will prepare a Program Environmental Impact Report (EIR) for the City of San Luis Obispo Land Use and Circulation Elements Update. We need to know the views of your agency and members of the public as to the scope and content of the environmental information. For agencies please provide comments pertinent to your agency's statutory responsibilities in connection with the proposed project.

Refer to the attached discussion for a description of the background of the Land Use and Circulation Elements (LUCE) Update process and a description of the proposed project. In addition, further information on the LUCE Update process, draft element language and opportunities for project involvement can be found on the project web site: www.slo2035.com

SCOPING MEETING: The City will conduct a public scoping meeting in conjunction with this Notice of Preparation (NOP) in order to present the project and the EIR process and to receive public comments and suggestions regarding the scope and content of the EIR. This meeting will be held by the Planning Commission on:

Wednesday, January 8, 2014 at 6 pm
Council Chambers, City Hall
990 Palm Street,
San Luis Obispo CA 93401

In addition, there will be an opportunity to provide scoping comments at a community workshop to be held:

Saturday, December 7, 2013, 1:00 PM – 4:30 PM
City-County Library Community Rooms
995 Palm Street
San Luis Obispo, CA 93401

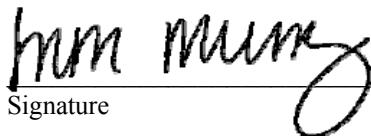
PLEASE provide us the following information at your earliest convenience, but not later than the 30-day comment period which will begin with your agency's receipt of the NOP.

1. **NAME OF CONTACT PERSON.** (Address and telephone number)
2. **PERMIT(S) or APPROVAL(S) AUTHORITY.** Please provide a summary description of these and send a copy of the relevant sections of legislation, regulatory guidance, etc.
3. **ENVIRONMENTAL INFORMATION.** What environmental information must be addressed in the Program EIR to enable your agency to use this documentation as a basis for your permit issuance or approval?
4. **ALTERNATIVES.** What alternatives does your agency recommend be analyzed in equivalent level of detail with those listed below?
5. **RELEVANT INFORMATION.** Please provide references for any available, appropriate documentation you believe may be useful to the City in preparing the Program EIR.
6. **FURTHER COMMENTS.** Please provide any further comments or information that will help the City to scope the document and determine the appropriate level of environmental assessment.

Due to the time limits mandated by State law, your response must be sent at the earliest possible date, but not later than **30 days** after receipt of this notice. Your responses will be included in the City record for this project.

Please send your response before **January 10, 2014** to **Kim Murry** at the following address:

Kim Murry, Deputy Director
Community Development Department
City of San Luis Obispo
919 Palm Street
San Luis Obispo, CA 93401

 12-4-13

Signature Date

Kim Murry, Deputy Director
Community Development Department
City of San Luis Obispo
919 Palm Street

San Luis Obispo, CA 93401

Telephone: (805) 781-7274

FAX: (805) 781-7173

Email: kmurry@slocity.org

Reference: California Administrative Code, Title 14, Section 15082.

**CITY SAN LUIS OBISPO
NOTICE OF PREPARATION OF A PROGRAMMATIC
ENVIRONMENTAL IMPACT REPORT
FOR THE
GENERAL PLAN LAND USE AND CIRCULATION ELEMENTS UPDATE**

1. Project Title

City of San Luis Obispo
Land Use and Circulation Elements Update (LUCE Update)

2. Lead Agency

City of San Luis Obispo
Community Development Department
919 Palm Street
San Luis Obispo, CA 93401

3. Contact Person

Kim Murry
Deputy Director, Long-Range Planning
(805) 781-7274
e-mail: kmurry@slocity.org

4. Project Website

For project information, please see www.slo2035.com

5. Scoping Meeting

The City will conduct a public scoping meeting in conjunction with this Notice of Preparation (NOP) in order to present the project and the EIR process and to receive public comments and suggestions regarding the scope and content of the EIR. This meeting will be held by the Planning Commission on:

Wednesday, January 8, 2014 at 6 pm
Council Chambers, City Hall
990 Palm Street,
San Luis Obispo CA 93401

In addition, there will be an opportunity to provide scoping comments at a community workshop (Future Fair 3) to be held:

Saturday, December 7, 2013, 1:00 PM – 4:30 PM
City-County Library Community Rooms
995 Palm Street
San Luis Obispo, CA 93401

Future Fair 3 will be a chance to see, review, and discuss the changes that are being proposed as part of the General Plan Update. City staff and the EIR consultant will be available to discuss the scope of the proposed Program EIR and to take input from the public on the Program EIR process and to answer any questions the public may have.

The scoping meeting is provided to satisfy the requirements of the Public Resources Code, §21083.9, that require a Lead Agency to call at least one scoping meeting for a project such as the Draft 2035 LUCE Update. Interested persons should contact Kim Murry, Deputy Director, City of San Luis Obispo Community Development Department, at (805) 781-7274 if they have questions, or if they need information on additional locations where the documents can be accessed.

6. Project Location

The City of San Luis Obispo is situated in the Central Coast Region of California along U.S. Highway 101, about 230 miles south of San Francisco and 190 miles north of Los Angeles (see Figure 1). Its coastal location is characterized by a mild Mediterranean climate that is moderated by the influence of the Pacific Ocean. The city is nestled about 10 miles inland from the coast in a narrow valley between the Santa Lucia Mountains and volcanic hills reaching up to 3,000 feet. The city is surrounded by agriculture and open space, including vineyards, field crops, oak woodland, and grasslands. While the area has several creeks, San Luis Obispo Creek bisects the town and is a defining feature of the traditional, pedestrian-oriented downtown district.

The City's General Plan addresses a Planning Area that extends beyond the current San Luis Obispo city limits (see Figure 2). As defined by the California General Plan Guidelines (2003), a Planning Area typically "Encompasses incorporated and unincorporated territory bearing a relation to the city's planning. The planning area may extend beyond the sphere of influence."

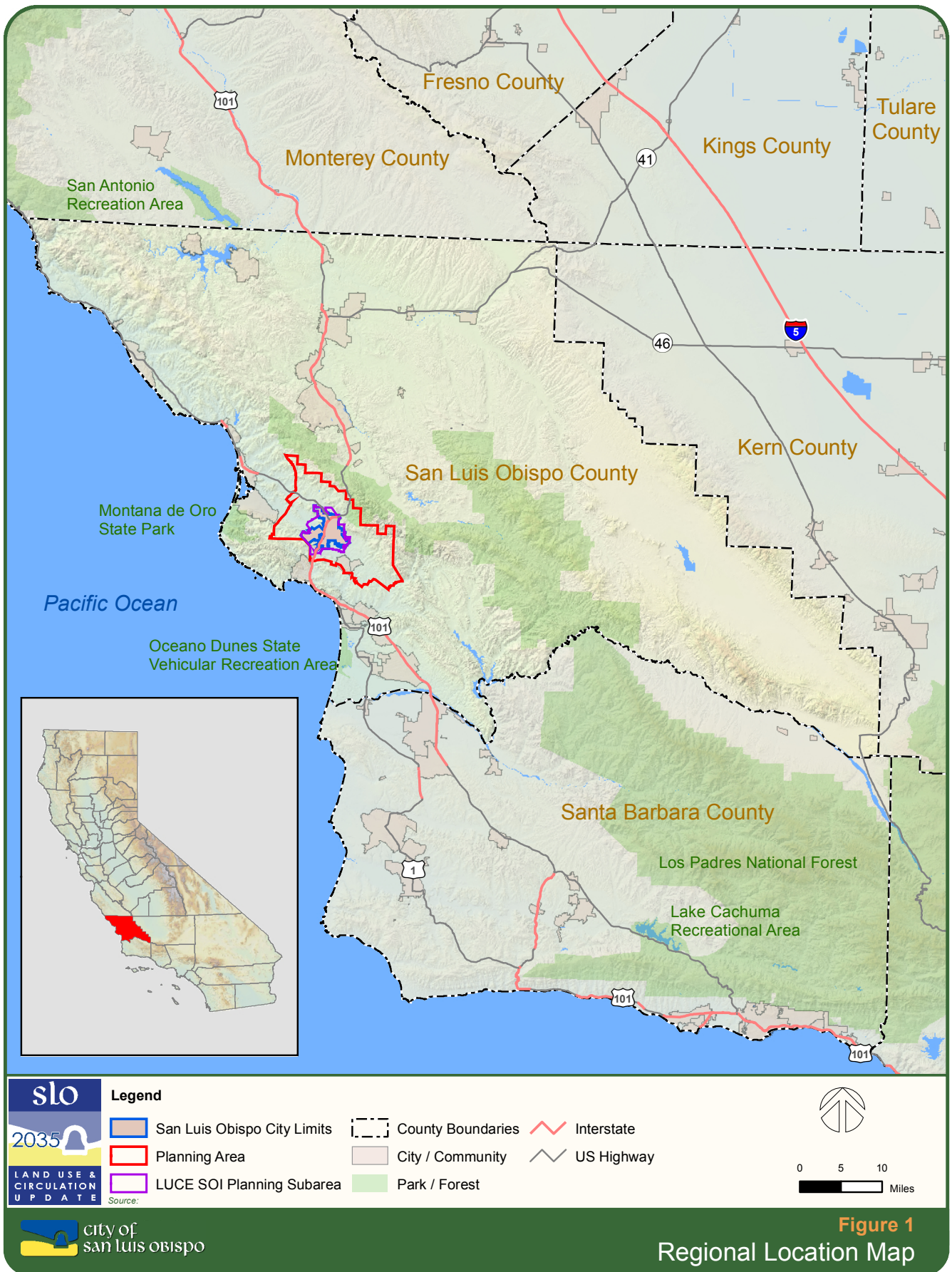
While the LUCE Update includes the complete Planning Area, changes in land use and circulation alternatives focused on a smaller, urbanized core area referred to as the LUCE Sphere of Influence Planning Subarea (LUCE SOI Planning Subarea). This smaller area is shown on Figure 3.

7. General Plan Elements Effected

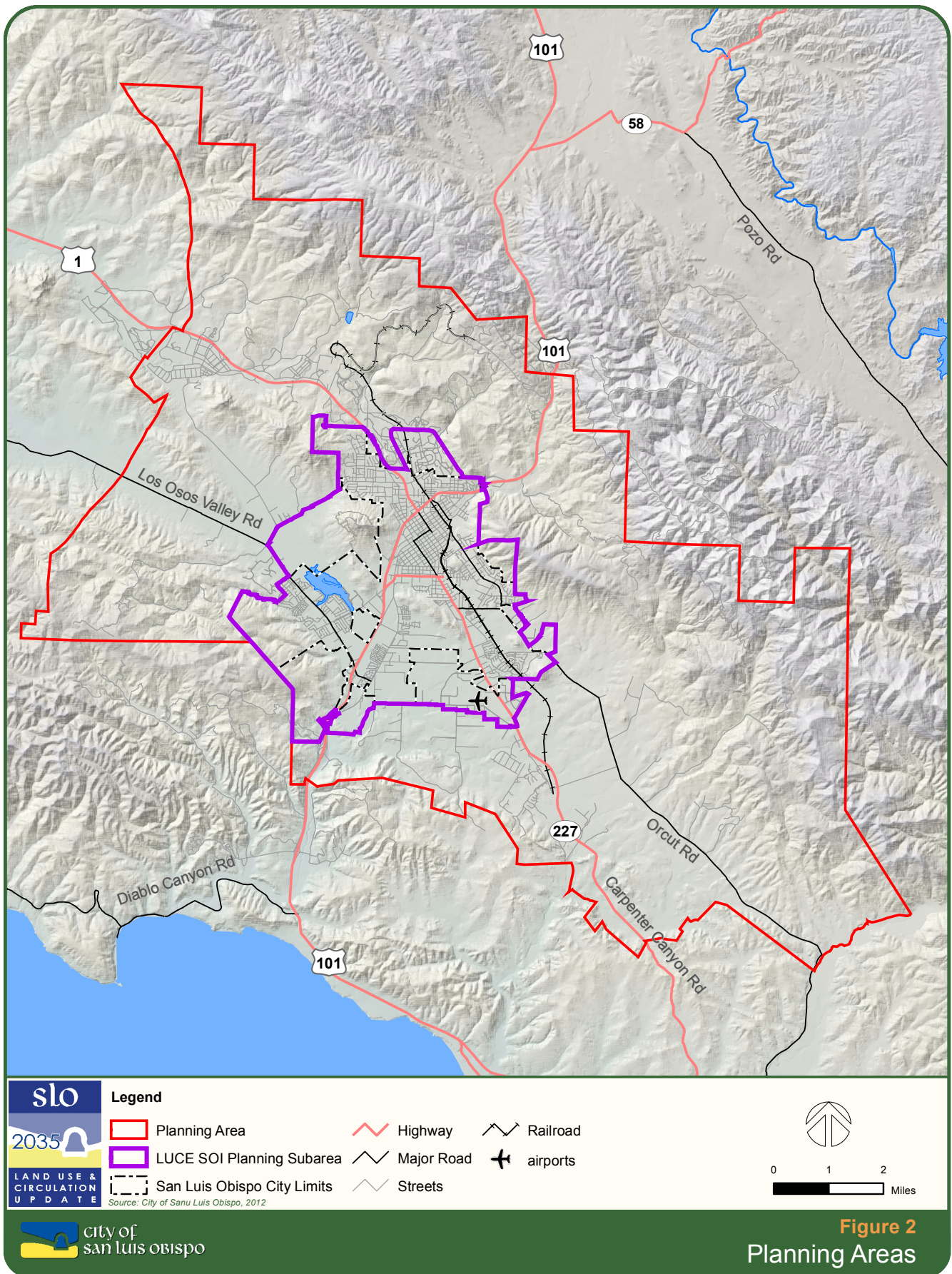
The Proposed Project is an update to the City's LUCE.

- The **Land Use Element** designates the general location and intensity of housing, business, industry, open space, education, public buildings and facilities, and other land uses. It helps guide neighborhood preservation, revitalization, and enhancement and protects environmental resources.
- The **Circulation Element** includes goals and policies relating to how residents, products and visitors move around San Luis Obispo. This element addresses cars, bicycles, pedestrians, air, rail, and public transportation.

As part of the Update, small changes in the definition of the designations are expected and specific sites will be evaluated for changes to their current designations (see Section 9, Project Description). Other elements of the City's General Plan will be reviewed and edited as necessary to remain consistent with any updates or changes that are made to the LUCE, but these changes are expected to be minor. State law requires this "internal consistency" so that each element supports and complements the others to achieve the community's goals.



SLOGPU_Basemap_Regional_2012_07_26_JKC



SLOGPU_Basemap_Regional_2012_07_26_JKC

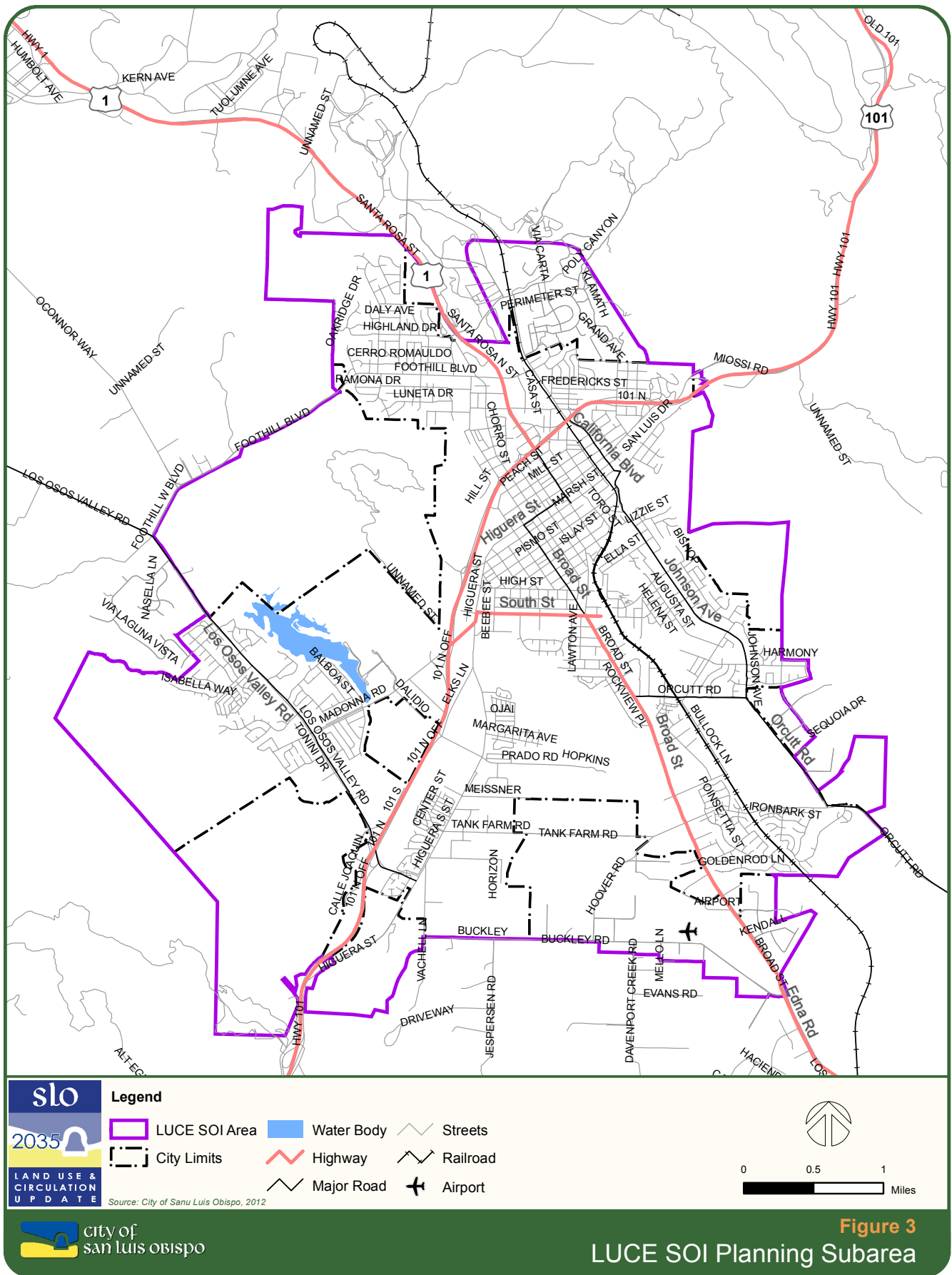


Figure 3
LUCE SOI Planning Subarea

SLOGPU_Basemap_Regional_2012_07_26_JKC

8. Zoning Designations Effected

Multiple designations. Future rezoning may be required for General Plan consistency and implementation for the sites evaluated and modified as part of this LUCE Update (see Section 9, Project Description).

9. Project Description

The City's General Plan guides the use and protection of various resources to meet community purposes. It reflects consensus and compromise among a wide diversity of citizens' preferences, within a framework set by State law. The General Plan is published in separately adopted sections, called elements, which address various topics.

Land Use Element Update

The Land Use Element represents a generalized blueprint for the future of the City of San Luis Obispo. Required by State law, it is the core of the General Plan. The Land Use Element sets forth a pattern for the orderly development of land within the City's planning area. This pattern should be based on residents' preference and on protection of natural assets unique to the planning area. The Element also describes the expected level of population growth resulting from construction of the kinds of housing units included in the plan, as well as the kinds of new commercial and industrial development that are responsive to the City's economic needs.

The City's Planning Area coincides with the County's San Luis Obispo Planning Area (Figure 2), and can be generally described as extending to the ridge of the Santa Lucia Mountains (Cuesta Ridge) on the north and east; the southerly end of the Edna Valley (northern Arroyo Grande Creek watershed boundary) on the southeast; the ridge of the Davenport Hills on the southwest; and the ridge of the Irish Hills, Turri Road in the Los Osos Valley, and Cuesta College in the Chorro Valley on the west. For the LUCE Update, the update of the Land Use Element focused primarily on a subset of the overall Planning Area. The geographic area primarily addressed by the LUCE Update extends beyond the city limits to incorporate the City's current Sphere of Influence, and is referred to as the LUCE SOI Planning Subarea (see Figure 3). This is the area directly influenced by the urban form of the community and the land use designation changes proposed as part of this Update.

The City's first General Plan, including land use and other elements, was adopted in 1961. A revised plan was adopted in 1966, following the County's first adoption of a plan for the San Luis Obispo area in 1965. The City adopted major revisions of its Land Use Element in 1972 and in 1977 and 1994.

Circulation Element Update

While the Land Use Element describes the City's desired character and size, the Circulation Element describes how transportation will be provided in the community. This Circulation Element Update describes how the City plans to provide for the transportation of people and materials within San Luis Obispo with connections to other county areas and beyond.

Transportation facilities and programs influence the character of neighborhoods, the location of specific land uses, and the overall form of the City. While the current Circulation Element is auto-centric in focus, the City's Circulation Element Update transitions to a more multi-modal approach. The Update will include "Complete Streets" concepts – providing equal focus to movement by automobiles, bicycles, pedestrians, and transit.

Update Overview

The City was successful in obtaining a Sustainable Communities Grant through the Strategic Growth Council (SGC). Several objectives were identified by the grant and the final LUCE Update product is anticipated to contain policy recommendations that are based on the following.

- Community input regarding the physical, social, economic, cultural and environmental character of the city in order to develop a vision of San Luis Obispo through the year 2035;
- A comprehensive guide for decision-making based on land use, design, circulation and access, sustainability and the preservation of the quality of life in the community;
- Policies that balance development and conservation to preserve the City's natural beauty, unique character and heritage while supporting housing opportunities, a vibrant economy and addressing disadvantaged communities;
- Evaluation of consistency with the Regional Blueprint and policies that guide development of a Sustainable Communities Strategy in collaboration with the San Luis Obispo Council of Governments (SLOCOG);
- Opportunities to create a "Complete Streets" circulation system (multi-modal system);
- Identification of areas appropriate for residential infill and densification;
- Identification of the circulation system that is needed to appropriately balance the community's values and desired growth;
- Identification of programs to help migrate to transportation modes other than the single occupant vehicle;
- Identification of transit opportunities that may be enhanced to accommodate Transit Oriented Developments (TOD);
- Identification of ways to achieve more affordable housing; and
- Promotion of energy efficiency & conservation and incorporating Climate Action Plan strategies.

In addition to the grant objectives (as developed by the City), the LUCE Update and associated Program EIR will also address the following.

- **South Broad Street Corridor Plan:** The LUCE Update will incorporate an area plan that addresses residential infill and enhancement of an area of the City currently zoned for commercial service and manufacturing uses. The Program EIR will incorporate this plan into the project description of the LUCE Update.
- **Healthy Cities Initiatives:** The LUCE Update will explore healthy cities initiatives and the link between health and land use planning.
- **Pedestrian Circulation Plan:** The LUCE Update will include development of a Pedestrian Circulation Plan for the Downtown as part of the Circulation Element update.
- **Nightlife Public Safety Assessment:** The LUCE Update will evaluate type, density, and capacity of various types of alcohol and late-night entertainment establishments that are desirable for the downtown and develop policies to support those findings.
- **Airport Issues:** The LUCE Update will include an updated technical assessment of safety zones around the airport and proposed policy language to promote the use and development of the airport while protecting the health, safety and welfare of the community.
- **Traffic Congestion Relief:** The LUCE Update will continue to seek ways to address traffic congestion through efforts such as street modifications, intersection improvements, pedestrian improvements, bicycle facilities, sidewalks, trip reduction programs, traffic signal operations, Los Osos Valley Road interchange, Prado Road construction, and public transit.
- **Other Transportation Issues:** The Circulation Element Update shall incorporate multi-modal levels of service standards for all modes of transportation including pedestrians, bicycles, and transit. The update shall comply with current regulations such as the Highway Capacity Manual 2010 incorporating pedestrian, bicycle, and transit level of service standards in addition to Complete Streets policies.

- **LAFCO Sphere of Influence Areas:** LAFCO has identified sphere of influence areas for the City of San Luis Obispo. These areas will be reviewed for their development potential.

Development of LUCE Update Alternatives

The result of the review and implementation of the preliminary program discussed above is the drafting of the Land Use Element and Circulation Element alternatives to be presented to City decision makers for their consideration, review and ultimate adoption.

The alternatives under consideration have been developed based on the ideas and concepts provided by the public (during previous community workshops / Future Fair events, online interactions, public meetings and a community-wide survey) and with the guidance of the Task Force for the Land Use and Circulation Elements Update (TF-LUCE) – a residents’ committee established by the City Council to assist in the LUCE Update.

For the City of San Luis Obispo, the alternatives process is a focused approach that looks at small adjustments that sustain an already desirable community form. The development of alternatives for San Luis Obispo is a two-step process: proposed physical alternatives and proposed policy changes.

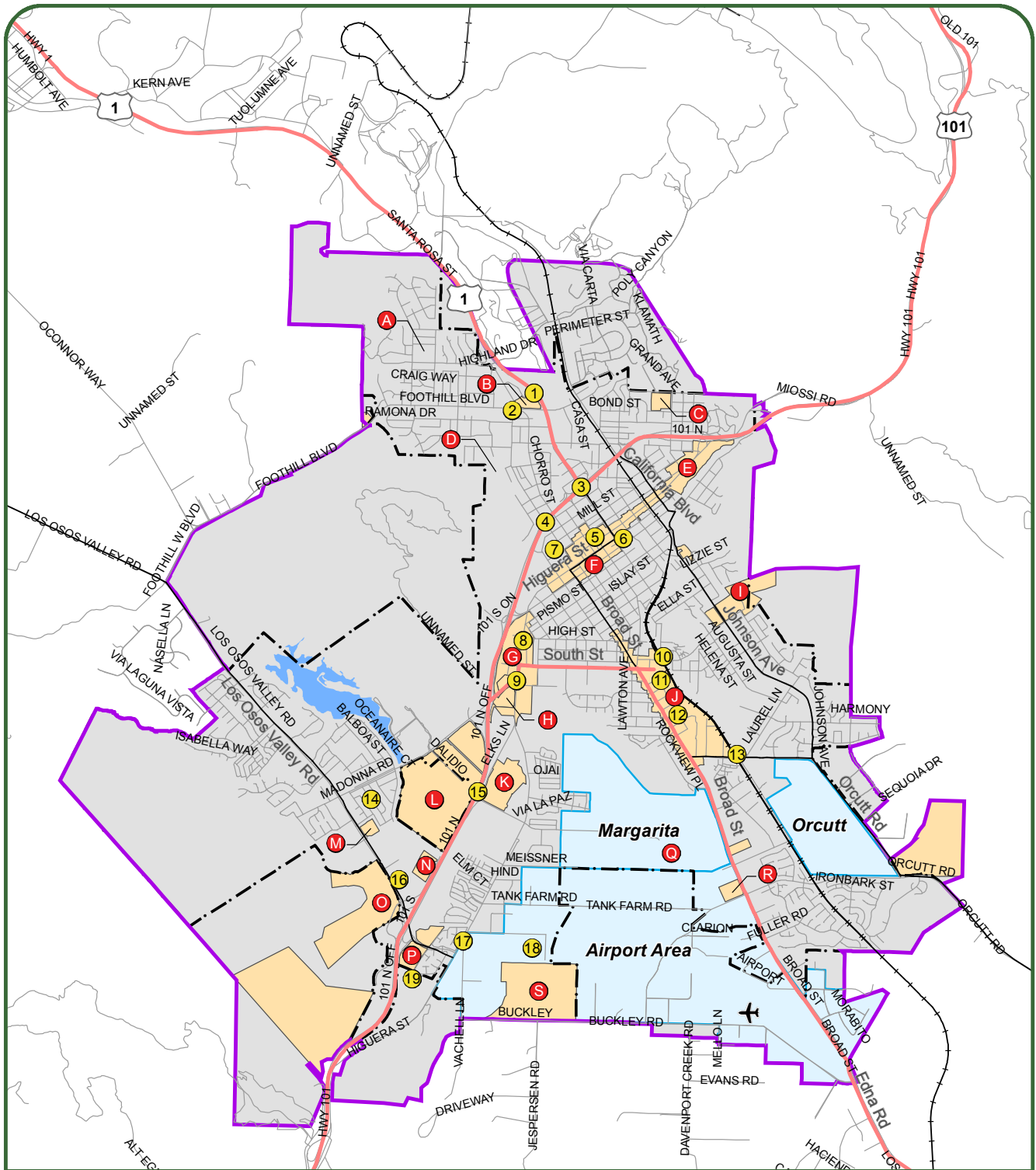
Proposed Physical Alternatives: This phase of the alternatives process started with City staff and the Consulting Team working together to identify locations that could be looked at as part of the LUCE Update. This included a review of existing plans, such as the City’s Housing Element, Economic Development Strategy, and Capital Improvements Plan. Additional input on locations that should be evaluated was sought from the community, the TF-LUCE, Planning Commission, and the City Council.

As the LUCE Update is a focused update, the intent was to concentrate on locations with the potential to accommodate change in land use type or intensity or areas in need of circulation improvements. For land use, most of the neighborhood areas were noted as “preserve and enhance” to indicate that changes will not be proposed relative to the existing General Plan Land Use Diagram (see Figure 4). While the land use designations in these areas will not change, vacant lots in these areas will potentially develop, enhancements to properties will occur, and improvements to the community will move forward.

The locations identified as areas of potential change (land use or circulation) were refined and one or more alternatives were developed for each location. Four of the locations identified (Avila Ranch, Foothill / Santa Rosa area, Dalidio / Madonna Road area, and the General Hospital property) were featured at the December 1, 2012 Community Workshop. At the workshop, participants were also asked to weigh in on the future of the Downtown area and to help identify other areas that should be considered for land use changes. For circulation, participants provided input on bike system improvements and locations that should be addressed in the LUCE Update.

Context was important when developing alternatives. Issues such as existing/proposed circulation patterns, type of adjacent land uses, neighborhood connections, and type and amount of land use were considered at each location. The alternatives will continue to be reviewed and refined throughout the LUCE process. See Figure 4 for a map of all locations put forward for potential land use or circulation changes.

On October 15, 2013, the City Council held a public hearing to review land use and circulation alternatives that had been developed to date through the public process and the recommendations provided by the TF-LUCE and the Planning Commission concerning physical alternatives. At this meeting, the City Council adopted a Resolution of the City Of San Luis Obispo Endorsing the Physical Alternatives Set for the LUCE Update to be Considered Through the EIR Process (Resolutions 10466, 10467, and 10468). These physical alternatives comprise one part of the Proposed Project to be assessed in the LUCE Program EIR (see Tables 1 and 2).



Legend

LUCE SOI Area	Specific Plan Area	Water Body	Railroad
Area of Potential Land Use Change	Preserve and Enhance	Highway	Airport
Circulation Potential Change	City Limits	Major Road	Streets

Scale: 0 0.5 1 Miles



Figure 4
Land Use and Circulation Alternatives Being Considered

SLOGPU_Basemap_Regional_2012_07_26_JKC

Table 1. Land Use Alternatives Being Considered

A	Nativity Church Site Removed from consideration.
B	Foothill @ Santa Rosa Area Consider mixed use for the area on both sides of Foothill between Chorro and Santa Rosa. Consider both horizontal and vertical mixed use. Emphasis on retail and housing near campus. Policies to support consideration of parking and height changes to facilitate mixed use.
C	Pacheco Elementary Site Removed from consideration.
D	Diocese Site near Bressi Pl. & Broad St. Removed from consideration.
E	Upper Monterey Area No physical land use changes proposed.
F	Downtown Area No physical land use changes proposed.
G	Mid-Higuera Area No physical land use changes proposed.
H	Caltrans Site Mixed use to include tourist commercial, office and some residential as shown in H-2 and H-4. Site may be appropriate to review height limit changes to accommodate desired development. Consider more public open space uses to serve as gateway and uses compatible with conference center.
I	General Hospital Site Support additional residential development on the site behind existing structure but delete the residential development proposed between the URL and the City limit line currently designated OS. Policies should support flexibility so that a range of residential uses can be considered (i.e. residential care, adjunct to transitional care use, other residential uses consistent with area).
J	Broad Street Area Incorporate physical alternative described in South Broad Street Area Plan endorsed by September 17, 2013 by City Council (Council Resolution 10460).
K	Sunset Drive-In Site Support consideration of mixed use. Develop policies to address appropriate mix of uses. Policy discussion should address historic nature of Sunset Drive-In and ensure site can still accommodate Homeless Services center. Provide bike connections as called for in bicycle transportation plan.
L	Dalidio / Madonna Area Support consideration of a mix of uses through LUE policies with significant open space/agricultural (at least 50%) component. Alt. L5 without specific direction of particular sizes or shapes. Residential component to be consistent with applicable airport policies.
M	Pacific Beach Site Policy development to support consideration of Commercial Retail fronting LOVR and Froom Ranch and park to serve neighborhood.
N	Calle Joaquin Auto Sales Area Support consideration of mixed use in the context with the Dalidio property and the City's agricultural parcel and focus on connectivity to the neighborhoods to the north. Develop policies to address appropriate mix of uses.

O	Madonna Site on LOVR Support consideration of policies to address future development. These should include viewshed, hillside and open space protection, potential height limits, wetland protection, access to other connections, historic farm buildings, mixed use to accommodate workforce housing, and neighborhood commercial type uses. Develop policies to address appropriate mix of uses.
P	LOVR Creekside Area Support consideration of a modified Alternative P-5 with medium high density residential infill housing with open space.
Q	Margarita Specific Plan Policy to support consideration of changes to MASP to allow increased density on eastern portion of MASP area,
R	Broad St. @ Tank Farm Rd. Site Support consideration of a mix of commercial uses with limited residential on upper floors. Commercial uses should serve the surrounding businesses and bicycle and pedestrian connectivity must be addressed.
S	Avila Ranch Support consideration of a mix of residential densities, connection to shops to the north, connection to S. Higuera and a mix of uses similar to what is shown in owners' concept. Respect creek/wildlife corridor. Develop policies to direct future development.

Table 2. Circulation Alternatives Being Considered

1	Boysen Ave. and Santa Rosa St. Support consideration of separated crossing for bikes/pedestrians of Santa Rosa at Boysen. Consider all vehicular alternatives for Boysen intersection at SR 1 including full closure, access restrictions, and retaining its current configuration.
2	Realign Chorro St., Boysen Ave., and Broad St. Support consideration of alternative 2-3 realignment of Chorro and Broad and Boysen.
3	Potential Ramp Closures at Highway 101 and State Route 1 Support consideration of alternative 3-2 ramp closures and consolidated SR1/Highway 101 interchange for further evaluation including impacts to residential streets and the need for a signage/way-finding program.
4	Broad St. and Highway 101 Ramp Closures Support consideration of alternative 4-2 ramp closures at Broad with the addition of bike and pedestrian overpass.
5	Convert Marsh St. and Higuera St. to Two-way (Santa Rosa St. to California Blvd.) Support consideration of two way vehicular circulation of Marsh and Higuera between Santa Rosa and California.
6	Transit Center Location on Santa Rosa St. and Higuera St. Support consideration of site/block of Higuera/Santa Rosa/Monterey for the transit center location and consider use of both public and private property. Include ideas from student projects and the Downtown Concept Plan.

7	Mission Plaza "Dog Leg" Support consideration of alternatives 7-2 and 7-3 (varying degrees of streets affected). Analyze full closure of roadways. Develop policy direction regarding desired outcomes and nature and phasing of treatment for the area.
8	Realign Bianchi Ln. and Pismo St. Support consideration of alternative 8-3, realignment of street intersection (Pismo to Bianchi).
9	Realign Madonna Rd. to Bridge St Instead of Higuera St. Consider appropriate connection from Madonna to S. Higuera in concert with redevelopment of Caltrans site. Potential to realign Madonna to connect with Bridge Street may better address some pedestrian and bike connections.
10	Bishop St. Extension Evaluate elimination of Bishop Street bridge over railroad tracks and consider road diet for Johnson Ave.
11	Victoria Ave. Connection to Emily St. Support consideration of Victoria connection to Emily.
12	Broad St. – Consolidate Access Support consideration of Broad Street consolidation of access points.
13	Orcutt Rd. Overpass Keep facility as part of Circulation Element. Do not consider removing facility due to concerns about increasing rail traffic.
14	Froom Rd. Connection to Oceanaire Neighborhood Provide pedestrian and bicycle connectivity only.
15	Prado Rd. Interchange vs. Overpass Evaluate both interchange and overpass
16	Connections to Dalidio Dr. from Froom Ranch Way and/or Calle Joaquin Evaluate whether one or more connections are needed to provide an additional connection between LOVR and Prado/Dalidio; whether an internal east-west or loop road is needed to connect these roads on the Dalidio property; and minimizing impact of road extensions on AG/OS land.
17	Realign Vachel Ln. Support consideration of alternative 17-2 Vachel to Higuera connection as a "back up" alternative in the event Buckley Road does not connect to S. Higuera.
18	North-South Connection between Tank Farm Rd. and Buckley Rd. Support consideration of alternative 18-2 creating a north-south connection between Tank Farm and Buckley for future connectivity.
19	Buckley Rd. to LOVR Connections Support consideration of alternatives 19-2 (Buckley to Higuera) and 19-3 (Higuera to LOVR behind Los Verdes - 101 bypass)

Proposed Policy Changes: As part of the LUCE Update, City staff, working with the Consulting Team, conducted a comprehensive evaluation of the existing goals, policies, and implementation programs that make up the current LUCE. This evaluation, presented in a matrix format, was used when reviewing the alternatives and existing LUCE policies. Existing policy was reviewed using the following criteria.

- Execution. Was the intent met or implemented?
- Clarity. Does it provide clear direction to staff, decision makers, and other users?
- Progress. Was this monitored or capable of being monitored.
- Outcome. Did this have the desired results?
- Current. Does this adequately address current vision, issues, opportunities, or City direction?
- Continuation. Should this be continued in the updated General Plan?
- Modification. How should this be modified?
- Other Comments. Notes for consideration as part of the LUCE Update.

This step also looked at the addition of new policy language that may be needed to:

- address notable policy gaps (missing policies) that have been identified over time in the existing General Plan;
- address other new policy areas identified thru the public process;
- add policy topics to respond to changes in State law, like policies on global warming and complete streets; and
- address items described in the Sustainable Communities grant that is funding this update.

As part of the project scope for the LUCE Update, new policy considerations noted by the City included:

- Neighborhood Wellness
- South Broad Street Corridor area
- Healthy Cities Initiatives
- Pedestrian Circulation Plan
- Consistency with San Luis Obispo Council of Governments (SLOCOG) efforts
- Nightlife Public Safety Assessment
- Airport Issues
- Traffic Congestion Relief
- Other Transportation Issues
- LAFCO Sphere of Influence Areas

At the time of the publishing of the NOP, policy changes were still in review by the TF-LUCE, and are scheduled to be forwarded to the Planning Commission in December 2013 and City Council in January 2014. The City Council is expected to make a recommendation on the proposed policy changes that will be part of the Proposed Project (in addition to the physical alternatives identified in October 2013).

Capacity for Growth

As background for considering land use and circulation alternatives, it is important to understand current conditions and likely trends into the future, with a particular focus on projected land demand and the availability of land in the City and surrounding area to satisfy that demand. According to recent projections prepared by the SLOCOG, the City of San Luis Obispo is projected to grow in population from approximately 44,000 in 2010 to 49,000 in 2035, an increase of approximately 5,000 persons in 25 years. During the same period, the City of San Luis Obispo's housing stock is projected to grow by 2,651 units.

SLOCOG has also projected that the City of San Luis Obispo will grow its job base from 33,000 jobs in 2010 to 42,400 jobs in 2035, an increase of 9,400 jobs in 25 years. This roughly translates into demand for an additional 5 million square feet of floor area, approximately a quarter of which would be retail development.

These demand numbers need to be compared to the existing and planned supply of land available to meet this demand, including planned and approved projects, specific plans, and vacant land.

The City has approved three specific plans (Margarita Area, Airport Area, and Orcutt Area). If built out as adopted, these specific plan areas would provide for 3,496,642 total square feet of new non-residential floor area (575,954 square feet of this would be new retail floor area), 1,847 new housing units, and provide for 6,358 new jobs. Outside of these specific plans, the City has also approved projects with the potential to provide 390 new housing units and 99,000 square feet of retail floor area.

After subtracting the vacant land already involved in planned and approved projects and land within the three specific plan areas, the City can expect approximately 730 new units of residential development and 1,258,112 square feet of non-residential development from vacant land.

Draft LUCE Update

As a result of the efforts discussed above, through input from the public and the TF-LUCE, and with direction from the City Planning Commission and City Council, the draft LUCE have been created as working documents to be refined through further public participation and ultimately finalized through adoption by the City Council.

Full copies of the working drafts of the preferred physical and policy alternatives will be posted to the project website at www.slo2035.com. In addition, the project website also has the following available for the public:

- Project information and overview and purpose of the General Plan and Program EIR;
- Listing of all meetings;
- All presentations and materials produced for public meetings and workshops;
- Fact sheets regarding the planning process;
- All drafts and materials produced for the Plan and the Program EIR; and
- Library with all relevant documents.

The City has been working with the community on the development of the LUCE Update. A complete public draft is expected to be made available to the public in the first quarter of 2013 with the Draft Program EIR following soon after. All materials will be posted on the internet at the project website (www.slo2035.com). Hard copies of the Draft Program EIR will be available for review at the City Community Development Department (919 Palm Street, San Luis Obispo, CA) and the City/County Library (995 Palm Street, San Luis Obispo, CA).

10. PUBLIC PARTICIPATION AND DECISION MAKING OVERVIEW

The City has committed to designing a comprehensive and inclusive public participation program for the development of the LUCE Update. The goal is to ensure that by the time the project begins the final adoption process, members of the public have had the opportunity to take an active role in the development of the LUCE Update. In order to facilitate this process, the City is taking full advantage of multi-media promotions using public service announcements at local movie theatres, an informative project web site, and social networking involving outlets such as Facebook, Twitter, Foursquare and MindMixer.

Public Workshops: The City has, and will continue to host a comprehensive set of public workshop, and is encouraging any interested parties or agency representatives to participate to get their voice shared and their concerns addressed. The following is a summary of the public workshops and Future Fairs to date and upcoming opportunities to attend future workshops:

- **May 16, 2012.** The first public workshop focused on identifying San Luis Obispo neighborhoods, what makes them special, and what can be done to make them better.
- **September 27, 2012.** The objective of the workshop was to collect/refine community input on issues and opportunities associated with six key topic areas. This information will be used to guide development of alternatives in later phases. The six topics were developed based on the community survey, neighborhood workshops and TF-LUCE inputs. The six topic areas were: 1) Creative Reuse of Land, 2) Downtown, 3) Motorized Circulation, 4) Non-Motorized Circulation, 5) New Growth Areas, and 6) Community Amenities.
- **December 1, 2012.** Future Fair 1. This was the kick off for the first Future Fair and was designed to 1) get community input on the principles that will guide the update, 2) get thoughts on how to "reimagine" the future of several key sites around the community, and 3) get input on circulation improvements and priorities. The input will be used to develop a set of alternatives that will be used to guide the development of the General Plan Update and improve and enhance our community.
- **June 1, 2013.** Future Fair 2. This community workshop was designed to provide an overview of the land use and circulation alternatives that have been developed for consideration and to get community input on these alternatives. The workshop also featured a station designed to gain input on Complete Street priorities and transit use. The input will be used in the development of a Preferred Alternative that will be used to guide the development of the General Plan Update.
- **December 7, 2013.** Future Fair 3 (Upcoming). The past two Future Fair events have been held to get the public's help in defining the course for the City's General Plan Update. Future Fair 3 (1pm to 5pm, City-County Library, 995 Palm Street, Downtown San Luis Obispo) will be a chance to see, review, and discuss the changes that are being proposed as part of the General Plan Update. This Future Fair will also include the Program EIR scoping meeting giving the public the opportunity to ask questions about the Program EIR process and to provide input on topics to be covered.

Detailed meeting materials and supporting documentation for all of the workshops discussed above, in addition to information on future opportunities for public involvement, can be found on the project web site at www.slo2035.com.

TF-LUCE Meetings: To date, the TF-LUCE has participated in 27 meetings (all open to the public) to discuss the project and to refine the current LUCE documents for review by City decision makers. A complete outline of past and future meeting topics and objectives can be found on the project web site at www.slo2035.com.

Planning Commission: The City Planning Commission is an advisory body, appointed by the City Council, to make decisions on land use projects through the public hearing process. The Planning Commission also provides recommendations on long range planning projects to the City Council. The Planning Commission has a key role in the LUCE Update as the reviewing body for the draft elements formulated through the TF-LUCE and City staff. To date, the Planning Commission has met five times to discuss the LUCE Update.

City Council: The San Luis Obispo City Council is the ultimate review and final adoption authority for the LUCE Update. They will consider the input gathered throughout the planning process and will review the recommendations made by the City advisory bodies including the Planning Commission and the TF-

LUCE as well as the other advisory bodies citywide. The City Council has the final opportunity to revise the alternatives presented by staff and the project consultant team and will have the responsibility to certify the Program EIR. To date, the City Council has met nine times to review and provide comments on the project development process.

11. Program Environmental EIR

The comprehensive update to the City's General Plan LUCE is proposed in order to establish and implement an updated set of goals, policies, and programs as well as associated LUCE diagrams for directing the future of the community relative to topics covered by these two elements.

The City of San Luis Obispo will be the Lead Agency and will prepare a Program Environmental Impact Report (EIR) for the adoption and implementation of the LUCE Update and any ancillary updates to other elements. This Notice of Preparation (NOP) for a Program EIR has been prepared in compliance with the California Environmental Quality Act (CEQA).

The CEQA Guidelines identify several types of EIRs, each applicable to different project circumstances. The proposed LUCE Update EIR will be prepared as a Program EIR pursuant to State CEQA Guidelines Section 15168. Program EIRs are defined by Section 15168 as the environmental impact analysis of a series of actions that can be characterized as one large, related project. The program level analysis will consider the broad environmental effects of the proposed changes associated with the LUCE Update. The EIR will be used to evaluate subsequent projects (public and private) under the proposed Update consistent with CEQA and the State CEQA Guidelines.

A Program EIR, prepared in connection with general plan elements, necessarily deals with issues on a level of broad generalities, and due to the nature of the project (a general plan update) is not as detailed as an EIR on a specific construction project. The program-level analysis addresses the probable environmental impacts of basic policies and programs, general cumulative effects, and programmatic mitigation measures and alternatives. Potential effects associated with subsequent development accommodated by a general plan update can be predicted and analyzed in more detail, but the analysis of the general plan is limited by the absence of specific development proposals in most cases.

Section 15082 of the CEQA Guidelines requires that after a decision is made to prepare an EIR, the lead agency must prepare an NOP to inform all responsible and trustee agencies that an EIR will be prepared. The purpose of this NOP is to provide sufficient information about the 2035 LUCE Update and its potential environmental impacts to allow agencies and the public to make a meaningful response related to the scope and content of the EIR. An Initial Study has not been prepared for this project because the EIR will address all environmental topics. Instead, a summarized description of the 2035 LUCE Update and a description of potential environmental effects to be analyzed are provided herein.

12. Potential Environmental Impacts to be Assessed

Pursuant to state and local guidelines implementing CEQA, the City of San Luis Obispo, as the Lead Agency, has determined that a Program EIR is required to evaluate the proposed 2035 LUCE Update. The Program EIR will evaluate the following impacts, considered to be the probable environmental impacts resulting from the proposed general plan update:

Aesthetics

The city is located in a visually outstanding location, with the volcanic Morros, Santa Lucia Mountains, open space, and agricultural areas providing a scenic backdrop that frames the city. Scenic routes also traverse the planning area, such as Highway 1 and Highway 227. Long-term development accommodated by the LUCE Update could affect the overall aesthetic character of the area and development could introduce a source of additional light and glare that could adversely affect nearby areas. These issues will be addressed in the EIR.

Agricultural Resources

The City of San Luis Obispo is an urban area, and large scale agricultural activities are primarily located outside of the city limits; however, because of its location within a rural and agricultural region, the city functions as an important center location for agricultural commerce, both locally and beyond. Development under the LUCE Update could affect Prime Farmland, Unique Farmland or Farmland of Statewide Importance surrounding the city, including land currently under cultivation. Adoption of the LUCE Update could potentially re-designate current land uses within the City's Sphere of Influence and potentially require annexation of lands influenced by agricultural activities. These issues will be analyzed in the EIR.

Air Quality

The proposed LUCE would permit a build-out potential that would potentially increase the city's existing population. Projected population levels may be inconsistent with the San Luis Obispo County Air Pollution Control District's Air Quality Management Plan. The increase in population would result in an increase in vehicular traffic, which would result in the marginal degradation of the air quality of the air basin. Future development may also increase air pollution due to construction activities and energy generation for utilities serving the developments. Modeling will be conducted to estimate regional (e.g., construction and operational) increases in criteria air pollutants and precursors (e.g., respirable particulate matter [PM10], fine particulate matter [PM2.5], reactive organic gases [ROG], and oxides of nitrogen [NOX]). These issues will be analyzed in the EIR.

Biological Resources

While a majority of the existing city is developed with urban uses, some of the areas may include sensitive plant and animal species. Existing undeveloped lands provide open space and support habitats that are considered sensitive to the region. The LUCE Update may have the potential to affect potentially sensitive species, their habitats, and wildlife corridors. These issues related to biological resources will be addressed in the EIR. There is potential for development associated with the project to result in losses to native vegetation and oak trees. In addition, locally designated natural communities may potentially be affected by development resulting from the General Plan build-out. The EIR will discuss issues related to locally designated species and natural communities.

Cultural Resources

Lands throughout the city and vicinity contain a wide variety of resources that are significant to the area's local history, regional architecture, archaeology, and culture. The area is within a region historically inhabited by Native American groups, namely the Obispeño Chumash. Much of the city's downtown consists of land near the Mission San Luis Obispo de Tolosa, a highly sensitive and unique historic resource. Prehistoric Native American sites and historic resources such as the Mission and Chinatown district are known to support sensitive cultural resources. These locations are considered highly sensitive as there is a high probability that they may contain significant cultural resources. Historic resources related to early city development are also prevalent within the city. Generalized impacts to historic and prehistoric resources will be described in the EIR.

Geology and Soils

There are several faults within the vicinity of San Luis Obispo. These faults include the Santa Andreas, Hosgri, Los Osos, West Huasna, Oceanic and Edna Faults. Other geologic hazards in the planning area include liquefaction, slope stability (landslides primarily) and alluvial soils. The EIR will include a discussion of potential seismic and landslide hazards, as well as expansive soil related hazards. The City and planning area are not located in an area that would be subject to hazards associated with tsunami, seiche, or mudflow. It should be noted that the City of San Luis Obispo recognizes these geologic influences in the application of the Uniform Building Code to all new development within the city. General Plan policies would control the density and type of development permitted in areas with identified geologic constraints. These issues will be analyzed in the proposed EIR.

Public Services

Increased development within the City and potential annexation areas may result in a need for additional fire and police protection services. Future residential development in vacant and undeveloped areas in addition to increasing residential density at various locations may affect the area schools. Additionally, the increase in population due to the LUCE Update may require additional park and recreational facilities. Increased population may also increase maintenance costs of public facilities, including roads and result in a need for additional municipal services including administration, planning, and public works. The EIR will address impacts related to public services.

Transportation and Circulation

New trips will be generated by build-out of existing vacant parcels located within the current city limits, and development of the land uses envisioned for expansion areas. This planned development, the potential population increase, and tourism-related activities may generate additional vehicular movement, impact existing transportation systems, and create a demand for additional parking. These effects will be discussed in the EIR, and the recommendations carried forward through the Circulation Element. Impacts related to the use of alternative transportation methods (public transit, bikeways and pedestrian systems) will be discussed in the EIR, and policies would be included to address this issue.

Global Climate Change

The analysis of climate change impacts will evaluate the greenhouse gas (GHG) emissions associated with the implementation of the proposed LUCE Update. To the extent feasible, this analysis will rely on the city's Climate Action Plan (CAP) for the determination of carbon dioxide equivalent (CO₂e) mass emissions with implementation of the plan. The EIR will also reconcile GHG emissions modeling assumptions with those used in the GHG emissions inventory, to ensure consistency. The EIR will determine if there are any additional feasible mitigation measures that are not currently included in the General Plan or CAP. Where potentially significant impacts of climate change on the project are identified, the EIR will include mitigation measures to help the LUCE Update remain consistent with applicable requirements.

Hazards and Hazardous Materials

The storage and handling of hazardous materials occurs within the City and planning area. New development may include additional storage and handling of such materials. Development of vacant and/or agricultural areas within the Sphere of Influence and within the undeveloped expansion areas may expose people to hazards resulting from exposure to dust and pesticides associated with adjacent agricultural operations. The introduction of activities and development in areas considered to be high fire hazard zones has the potential to result in increased exposure to fire hazards. In addition, impacts related to exposure to hazards related to the operation of the Diablo Canyon Nuclear Power Plant and San Luis Obispo Airport will be addressed. These issues will be analyzed in the EIR.

Hydrology and Water Quality

Drainage patterns may be altered as a result of future development in accordance with the LUCE Update. In addition, development in undeveloped areas will result in changes to absorption rates and the rate and amount of surface runoff. Drainage issues will be discussed in the EIR. Potential flooding impacts affect both developed properties in the city and undeveloped lands in the city's expansion areas. The 100-year floodplain traverses through portions of the City and planning area. Surface waters may be significantly affected by development associated with the LUCE Update. Future land uses replacing undeveloped areas may discharge pollutants into surface waters. Development is also anticipated to result in increased surface runoff that has the potential to affect surface water quantities. These issues will be analyzed in the EIR.

Land Use and Planning

The proposed Land Use Element establishes a planned land use pattern and long-range policies to guide growth within the City corporate boundary and proposed Sphere of Influence. These policies, to be implemented by a series of implementation measures, are intended to preserve and enhance the quality

of the community. The General Plan is the governing long-range guide for future development in the City, and all implementation tools will need to be made consistent with the General Plan. The EIR will examine the General Plan's consistency with regional plans, including those related to transportation, air quality, and the protection of natural resources. These issues will be examined further in the EIR. The General Plan would not conflict with any adopted habitat conservation plan.

Noise

As a result of implementation of the updated LUCE, currently vacant and undeveloped areas may be developed. The development of these areas may produce increased noise levels. Short-term increases could arise from construction, while long-term increases are typically associated with increased traffic. Future noise sources in the planning area also include (but are not limited to) the San Luis Obispo Airport, Highway 101, and industrial, commercial, and agricultural operations. Noise levels will be modeled for existing and cumulative conditions (both with and without the implementation of the plan) for the purposes of determining increases at noise sensitive receptors and potential land use incompatibilities. Noise issues will be addressed in the EIR.

Population and Housing

In addition to the infill of vacant land within the city limits, the General Plan envisions potential development within the city's existing Sphere of Influence. The Land Use Element Update describes the pattern and intensity of future development, including residential, commercial, industrial, recreation, and open space land uses. Infill within the current corporate boundary and within expansion areas as allowed under the proposed LUCE Update will result in additional housing and employment opportunities. The effects of anticipated growth in the City's population and housing units will be discussed in the EIR, as it pertains to regional land use and air quality-related growth forecasts to determine consistency with regional plans. The growth-inducing impacts of the General Plan will also be discussed in the EIR.

Recreation

The increase in population due to build-out under the Land Use Element Update may increase the demand for park and recreational facilities. Development in undeveloped areas of potential expansion areas as well as infill development may affect existing recreational opportunities. The increase in parks demand, as well as the need for additional facilities to accommodate future growth, will be discussed in the EIR.

Utilities and Service Systems

Increased development within the City and annexation areas may result in a need for additional fire and police protection services and may affect local schools. Additionally, the increase in population due to the LUCE Update may require additional park and recreational facilities and may also increase maintenance costs of public facilities, including roads and result in a need for additional municipal services including administration, planning, and public works. The EIR will address public services.

The proposed General Plan would accommodate development that would increase the demand on sewer systems serving the planning area. This issue will be addressed in the EIR.

Local creeks are subject to flooding during severe storm events. Drainage issues will be addressed in the EIR.

Solid waste is transferred and disposed of at the Cold Canyon Landfill. The increase in solid waste that will occur with the LUCE Update will be addressed in the EIR.

The City of San Luis Obispo has adopted a multi-source water supply strategy and obtains water from five sources: Salinas Reservoir (Santa Margarita Lake), Whale Rock Reservoir, Nacimiento Reservoir, ground water, and recycled water. Build-out of the LUCE Update could result in increased demand on current water resource availability. This issue will be examined in the EIR to ensure that adequate water supply is identified for future growth.



Please see the next page



Air Pollution Control District
San Luis Obispo County

January 24, 2014

Kim Murry
City of San Luis Obispo
919 Palm Street
San Luis Obispo CA 93401

SUBJECT: APCD Comments Regarding the Notice of Preparation of a Programmatic Environmental Impact Report (EIR)

Dear Ms. Murry,

Thank you for including the San Luis Obispo County Air Pollution Control District (APCD) in the environmental review process. We have completed our review of Notice of Preparation of a Programmatic EIR for the City of San Luis Obispo's General Land Use Plan and Circulation Elements Update. *The following are APCD comments that are pertinent to this project.*

GENERAL COMMENTS

As a commenting agency in the California Environmental Quality Act (CEQA) review process for a project, the APCD assesses air pollution impacts from both the construction and operational phases of a project, with separate significant thresholds for each. **Please address the action items contained in this letter, with special attention to items that are highlighted by bold and underlined text.**

Comment 1

1. Contact Person:

Melissa Guise
Air Pollution Control District
3433 Roberto Court
San Luis Obispo, CA 93401
(805) 781-5912

2. Permit(s) or Approval(s) Authority:

Individual projects managed under the future Land Use and Circulation Element will have to meet the following construction and operational phase permit requirements from the APCD:

Construction Permit Requirements

Portable equipment, 50 horsepower (hp) or greater, used during construction activities may require California statewide portable equipment registration (issued by the California Air Resources Board) or an APCD permit. Operational sources may also require APCD permits. The following list is provided as a guide to equipment and operations that may have permitting requirements, but should not be viewed as exclusive. For a more detailed listing, refer to the Technical Appendices, page 4-4, in the APCD's 2012 CEQA Handbook.

- Power screens, conveyors, diesel engines, and/or crushers
- Portable generators and equipment with engines that are 50 hp or greater
- Electrical generation plants or the use of standby generator
- Internal combustion engines
- Rock and pavement crushing
- Unconfined abrasive blasting operations
- Tub grinders
- Trommel screens
- Portable plants (e.g. aggregate plant, asphalt batch plant, concrete batch plant, etc)

To minimize potential delays, prior to the start of the project, please contact the APCD Engineering Division at (805) 781-5912 for specific information regarding permitting requirements.

Operational Permit Requirements

Operational sources may require APCD permits. The following list is provided as a guide to equipment and operations that may have permitting requirements, but should not be viewed as exclusive. For a more detailed listing, refer to the Technical Appendix, page 4-4, in the APCD's 2012 CEQA Handbook.

- Portable generators and equipment with engines that are 50 hp or greater;
- Electrical generation plants or the use of standby generator;
- Dry cleaning;
- Boilers;
- Internal combustion engines; and
- Cogeneration facilities.

Most facilities applying for an Authority to Construct or Permit to Operate with stationary diesel engines greater than 50 hp, should be prioritized or screened for facility wide health risk impacts. A diesel engine-only facility limited to 20 non-emergency operating hours per year or that has demonstrated to have overall diesel particulate emissions less than or equal to 2 lb/yr does not need to do additional health risk assessment. **To minimize potential delays, prior to the start of the project, please contact the APCD Engineering Division at (805) 781-5912 for specific information regarding permitting requirements.**

3. Environmental Information:

The projects conducted under the Land Use Plan and Circulation Element has the potential for significant impacts to local air emissions, ambient air quality, sensitive receptors, and the implementation of the Clean Air Plan (CAP). A complete air quality analysis should be included in the DEIR to adequately evaluate the overall air quality impacts associated with implementation

of the proposed Plan. This analysis should address both short-term (construction) and long-term (operational) emissions impacts (including traditional air pollutants and greenhouse gas emissions). The following is an outline of items that should be included in the analysis:

- a) **Existing Conditions.** A description of existing air quality and emissions in the impact area, including the attainment status of the APCD relative to State and Federal air quality standards and any existing regulatory restrictions to development. The most recent Clean Air Plan (CAP) should be consulted for applicable information and the APCD should be consulted to determine if there is more up to date information available.
- b) **Project Emissions.** A detailed quantitative air emissions analysis at the project scale is not relevant at this time.
- c) **Consistency Analysis.** A qualitative analysis of the air quality impacts should be conducted. A consistency analysis with the CAP will determine if the emissions resulting from development under the project will be consistent with the emissions projected in the CAP, as described in item 6 of this letter. The qualitative analysis should be based upon criteria such as prevention of urban sprawl and reduced dependence on automobiles. A finding of Class I impacts could be determined qualitatively. The DEIR author should contact the APCD if additional information and guidance is required. All assumptions used should be fully documented in the DEIR.
- d) **Project Traffic.** To aid in the air quality analysis, the traffic study for the Plan should include the total daily traffic volumes projected. The traffic study results can be used in a qualitative analyses of the Plan to compare trip generation potentials between different alternatives and to consider effectiveness of mitigation methods for reducing traffic impacts.
- e) **Project Alternatives.** The DEIR should include a range of alternatives that could effectively minimize air quality impacts. A consistency analysis should be performed for each of the proposed alternatives identified, as described above. A qualitative analysis of the air quality impacts should be generated for each of the proposed alternatives. Examples include but are not limited to:
 - Flexible zoning to promote mixed use and design standards that protect mixed use.
 - Increase the amount of neighborhood scale mixed use.
 - Additional density beyond proposed zoning allowances.
 - Design standards that require narrow streets and minimum front setbacks on structures.
 - Limiting the size of each arterial through the development. This reduces the need for noise barriers such as cinder block walls along roadways, decreases roadway widths, and slows the speed of traffic, creating an atmosphere that encourages walking and bicycling.
- f) **Mitigation Measures.** Mitigation measures to reduce potentially significant air quality impacts from construction and operational phases to a level of insignificance should be

specified. If you would like to receive a copy of an example of a recommended format for the qualitative analysis section on air emissions impacts, contact the APCD Planning Division at 781-5912.

4. Permit Stipulations/Conditions:

It is recommended that you refer to the "CEQA Air Quality Handbook" (the Handbook). If you do not have a copy, it can be accessed on the APCD web page (<http://slocleanair.org/business/regulations.php>).

5. Alternatives:

Any alternatives described in the DEIR should involve the same level of air quality analysis as described in section 3 above.

6. Reasonably Foreseeable Projects, Programs or Plans:

The most appropriate standard for assessing the significance of potential air quality impacts for Community Plan EIRs is the preparation of a consistency analysis where the proposed project is evaluated against the land use goals, policies, and population projections contained in the CAP. The rationale for requiring the preparation of a consistency analysis is to ensure that the attainment projections developed by the APCD are met and maintained. Failure to comply with the CAP could result in long term air quality impacts. Inability to maintain compliance with the state ozone standard could bear potential negative economic implications for the county's residents and business community. The APCD's CEQA Air Quality Handbook provides guidance for preparing the consistency analysis and recommends evaluation of the following questions:

- a) Are the population projections used in the plan or project equal to or less than those used in the most recent CAP for the same area?
- b) Is the rate of increase in vehicle trips and miles traveled less than or equal to the rate of population growth for the same area?
- c) Have all applicable land use and transportation control measures from the CAP been included in the plan or project to the maximum extent feasible?

The land use and circulation policy areas contained in Appendix E of the APCD's CAP are crucial to the consistency analysis and should be specifically addressed in the DEIR. Implementation of these land use planning strategies is the best way to mitigate air quality impacts at the Community Plan scale.

These land use planning strategies are:

- Planning Compact Communities
- Providing for Mixed Land Use
- Balancing Jobs and Housing
- Circulation Management Policies and Programs
 - Promoting Accessibility in the Transportation System
 - Promoting Walking and Bicycling
 - Parking Management
 - Transportation Demand Management
 - Communication, Coordination and Monitoring

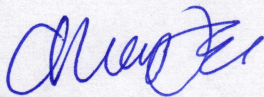
The formation of compact, pedestrian friendly and more economically self-sufficient communities will reduce automobile trip generation rates and trip lengths.

7. Relevant Information:

As mentioned earlier, the Handbook should be referenced in the EIR for determining the significance of impacts and level of mitigation recommended.

Again, thank you for the opportunity to comment on this proposal. If you have any questions or comments, the APCD staff member that will be responsible for this project in the future will be Melissa Guise at 781-5912.

Sincerely,



Meghan Field
Air Quality Specialist

MDF/arr

cc: City of San Luis Obispo
Melissa Guise, APCD

h:\plan\ceqa\project_review\3000\3800\3801-1\3801-1.docx

NOP Comment Responses

APCD Comment Letter

Comment Number	Comment Issues	Responses
Comment 1	Commenter includes a discussion of APCD permit review authority, standard air quality conditions for construction and operational impacts, environmental information required prior to APCD determinations, and permit stipulations. The commenter also requests detailed review of LUCE Update Alternatives, and an analysis of consistency with the approved CAP.	The permit review authority of the APCD is discussed in the project Background Report and in the EIR Setting discussion under Section 4.3, Air Quality. This section also includes a discussion of existing regulatory policy requirements and project consistency with the approved CAP. It is important to note that future development under the LUCE Update would be reviewed for consistency with these applicable policies and subsequent environmental review. The Alternatives in this EIR have been prepared in accordance with the requirements for alternative review under CEQA.

SUBCOMMITTEE FOR THE AIRPORT LAND USE COMMISSION

Commissioners: Roger Oxbarrow
Robert Tefft
Terry Orton

Date: January 10, 2014

To: City of San Luis Obispo
State Clearinghouse
Division of Aeronautics, California Department of Transportation

From: The Airport Land Use Commission of San Luis Obispo County Subcommittee

Subject: Notice of Preparation of a Programmatic Environmental Impact Report (EIR) for the City of San Luis Obispo Land Use and Circulation Element

The Airport Land Use Commission of San Luis Obispo County (ALUC) is a responsible agency for those portions of the City of San Luis Obispo which lie within the Airport Planning Area, as defined by the Airport Land Use Plan for the San Luis Obispo County Regional Airport (McChesney Field). The Airport Land Use Plan (ALUP) was adopted in December of 1973 and was most recently amended on May 18, 2005. The ALUC Subcommittee on the ALUP Amendment for the San Luis Obispo Regional Airport (Subcommittee) submits this reply to the City of San Luis Obispo's Notice of Preparation of a Programmatic Environmental Impact Report on behalf of the ALUC. The ALUC has authorized and directed the Subcommittee to communicate with the City on matters related to the General Plan Land Use and Circulation Element Update in connection with its work on the ALUP Amendment. This response is prepared in accord with and pursuant to California Code of Regulations (CCR) Title 14, Division 6, Chapter 3, Article 7, § 15082(b), which reads, in part, as follows:

"Response to Notice of Preparation. Within 30 days after receiving the notice of preparation under subdivision (a), each responsible and trustee agency and the Office of Planning and Research shall provide the lead agency with specific detail about the scope and content of the environmental information related to the responsible or trustee agency's area of statutory responsibility that must be included in the draft EIR."

The area of statutory responsibility of the Airport Land Use Commission directly encompasses the prevention of safety hazards and noise impacts which would be created by establishment of incompatible land uses within the Airport Land Use Planning Area.

Specific guidance is provided to lead agencies that undertake preparation of an environmental assessment for a project located in the vicinity of an airport by CCR Title 14, Division 6, Chapter 3, Article 10, §15154(a):

"When a lead agency prepares an EIR for a project within the boundaries of a comprehensive airport land use plan or, if a comprehensive airport land use plan has not been adopted for a project within two nautical miles of a public airport or public use airport, the agency shall utilize the Airport Land Use Planning Handbook published by Caltrans' Division of Aeronautics to assist in the preparation of the EIR relative to potential airport-related safety hazards and noise problems."

It is of note, however, that the Airport Land Use Handbook (Handbook, CALUPH) does not provide standards that can be applied to the evaluation of aviation safety hazards or noise impacts at a specific airport. The Handbook provides only generic guidance "to assist ALUCs in delineation of safety zones for a given airport" (CALUPH, page 3-16). As stated on page 3-20 of the Handbook:

"The generic safety zones presented in the preceding section are intended just as a starting point for the development of zones appropriate for a particular airport [...] In most instances, however, some degree of adjustment of the generic zones is necessary in recognition of the physical and operational characteristics of the airport."

Additionally, Table 3A of the Handbook provides a detailed enumeration of local factors which must be considered in determining appropriate safety zones for a specific airport.

It is clear, then, that the Airport Land Use Planning Handbook does not provide actual standards to be applied in the evaluation of airport-related safety hazards and noise problems, but, rather, defines a process by which such standards may be established for each public-use airport within the State, through the mechanism of duly-constituted Airport Land Use Commissions. For cases in which an Airport Land Use Commission has been established and has formulated and adopted an Airport Land Use Plan for a specific airport, the Airport Land Use Handbook fully supports and endorses the noise, safety, overflight, and airspace provisions of the local Airport Land Use Plan as being the definitive standards for that airport. In extensive consultations with the City of San Luis Obispo and the ALUC, the Division of Aeronautics of the California Department of Transportation has indicated that their interpretation of the Airport Land Use Planning Handbook and the California Aeronautics Act are consistent with this position. The adopted Airport Land Use Plan for the San Luis Obispo County Regional Airport provides the only set of criteria for evaluating airport-related safety and noise impacts which has been developed and approved through the mechanism set forth in the Airport Land Use Planning Handbook. In keeping with the provisions of 14 CCR §15154(a), therefore, consistency with the provisions of the adopted Airport Land Use Plan for the San Luis Obispo County Regional Airport should be utilized as the basis for determining whether or not significant environmental impacts related to safety or noise would be created by changes in land uses proposed by the Draft Land Use and Circulation Element.

Comment 1

The Airport Land Use Commission takes note of the fact that the proposed content of the City of San Luis Obispo Land Use and Circulation Element includes a (draft) section dealing with airport land use compatibility. This is somewhat troublesome, as this chapter was not developed in accord with the process and procedural requirements specified in the California Airport Land Use Handbook, and, therefore, would not meet the requirements of 14 CCR § 15082. The Division of

Comment 2

Aeronautics has, in fact, determined and communicated to the City that the City cannot adopt an alternate airport land use plan to the plan adopted by the ALUC. **Comment 2**

In light of the above discussion and in execution of the responsibilities imposed by §15096 (b)(2) of Title 14 of the California Code of Regulations, the Airport Land Use Commission of San Luis Obispo County specifies that the scope and content of the proposed environmental impact report for the City of San Luis Obispo Land Use and Circulation Element shall include the following information germane to the ALUC's statutory responsibilities in connection with this project:

- (a) For each of the "Land Use Alternatives Being Considered" listed in Table 1 of the Notice of Preparation, an indication as to whether the land use alternative lies entirely within the Airport Land Use Planning Area, partially within the Airport Land Use Planning Area, or entirely outside of the Airport Land Use Planning Area.
- (b) For each of the "Land Use Alternatives Being Considered" listed in Table 1 of the Notice of Preparation which lie entirely or partially within the Airport Land Use Planning Area, an analysis as to whether or not any potential future development that would be allowed by the Draft Land Use and Circulation Element would create an airport-related safety hazard or noise problem (as defined by being inconsistent with any noise, safety, overflight, or airspace protection provision of the adopted Airport Land Use Plan for the San Luis Obispo County Regional Airport).
- (c) For each of the "Land Use Alternatives Being Considered" listed in Table 1 of the Notice of Preparation which lie entirely or partially within the Airport Land Use Planning Area and which would create an airport-related safety hazard or noise problem (as defined by being inconsistent with any noise, safety, overflight, or airspace protection provision of the adopted Airport Land Use Plan for the San Luis Obispo County Regional Airport), alternative land use regulations with respect to residential density, non-residential intensity of use and special land-use functions which would eliminate airport-related safety hazards and/or noise problems by conforming to the noise, safety, overflight, and airspace protection provision of the adopted Airport Land Use Plan.
- (d) For each of the "Land Use Alternatives Being Considered" listed in Table 1 of the Notice of Preparation which lie entirely or partially within the Airport Land Use Planning Area, an analysis as to whether or not and the extent to which the alternatives and any potential future development that would be allowed by the Draft Land Use and Circulation Element would conflict with the Airport Land Use Plan.

Comment 3

The development of a realistic assessment of the need for additional residential development within the Airport Planning Area should be informed by a reasonable projection of future housing needs within the City, as a whole. Figures previously put forward by the City estimate that the population of San Luis Obispo will increase by "more than 5000" by the year 2030. The authority for this estimate is given as the San Luis Obispo Council of Governments (SLOCOG). It would appear, then, that the figures quoted are from the document *Long-Range Socio-Economic Projections (2030)*, which was prepared for SLOCOG by Economics Research Associates in 2006. Since these projections

Comment 4

predate the recent major shifts in the economic environment of the nation and of San Luis Obispo County, their accuracy can no longer be relied upon. The proposed LUCE, and its environmental potential impact within the Airport Planning Area should be based on future growth projections that reflect current economic realities.

It is even more important that the Community Development Department recognize that, because of the fact that the population of the City includes a large number of college students, total population growth is an extremely poor indicator of the need for residential development. The Community Development Department has stated quite emphatically its expectation that all future growth in the student body at California Polytechnic University (Cal Poly) will be accommodated in on-campus housing. The currently-proposed LUCE, therefore, must be based upon estimated future growth in the non-student population of San Luis Obispo, rather than on total population. From a historical perspective, actual growth in the non-student population of the City has been minimal. As shown in Table 1, between the U. S. Census of 2000 and that of 2010, the student population of San Luis Obispo increased by nearly 8%, while the non-student population actually fell by almost 300.

Table 1: Total and Non-Student Population Growth in San Luis Obispo, 2000 - 2010
 Source: 2000 and 2010 Decennial Censuses of the United States

Gensus Data	Total Population	Number of College and Graduate-Level Students	All Others
2000 Census	44,174	15,596	28, 578
2010 Census	45,119	16,819	28,300
Change	+945	+1,223	-278
Change (%)	+2.14%	+7.84%	-0.97%

Comment 4

The "Medium Growth" scenario of the above-cited study by Economic Research Associates projects a total population growth for the City of San Luis Obispo of 3,250 persons between 2015 and 2030. At the same time, Cal Poly administrators are expecting an increase of approximately 200 students per year (3000 total students) over the same time period (*The Tribune*, May 15, 2013). Thus, even if one accepts the pre-recession forecast of population growth, it can be seen that growth in the non-student population of the City is projected to be quite modest (250 persons over 15 years), and that, consequently, the demand for additional off-campus housing will be low (7.2 additional dwelling units per year at the City's median household size of 2.3 persons/household).

In light of these considerations, the ALUC requests that, during the preparation of the proposed Programmatic Environmental Impact Report for the Land Use and Circulation Element, the City develop and analyze an alternative project which limits residential development within the Airport Planning Area to the locations and densities compatible with the adopted Airport Land Use Plan.

Comment 4

The Airport Land Use Commission of San Luis Obispo County appreciates this opportunity to participate in the environmental analysis of the proposed City of San Luis Obispo Land Use and Circulation Elements Update and looks forward to working cooperatively with the City to ensure that future development within the Airport Land Use Planning Area is compatible with current and anticipated operations at the San Luis Obispo County Regional Airport.

Cordially,



Roger Oxborrow
Chairman
Airport Land Use Commission of San Luis Obispo County

NOP Comment Responses

Airport Land Use Commission Comment Letter

Comment Number	Comment Issues	Responses
Comment 1	Commenter states that the Airport Land Use Planning Handbook, as part of the ALUP, should be used to assess land use compatibility impacts between airport operations and potential development in the area.	Section 4.10, Land Use, provides a discussion of project compatibility with the ALUP document. Potential land use conflicts are discussed under Section 4.8, Hazards and Hazardous Materials, in addition to general impact assessments under Sections 4.3, Air Quality and 4.11, Noise.
Comment 2	Commenter restates concerns regarding compatibility between the project and the ALUP, and provides statutory requirements for ensuring compatibility.	ALUP compatibility is discussed in detail under Section 4.10, Land Use.
Comment 3	Commenter provides a list of impact issues areas that must be covered in the EIR. Including a) define location of land use areas within the Airport Planning Area, b) analysis of impacts related to development in the Airport Planning Area, c) analysis of impacts related to development in overflight area, and d) analysis of impacts related to conflicts with the ALUP.	Section 4.10, Land Use, provides a discussion of project compatibility with the ALUP document. Potential land use conflicts are discussed under Section 4.8, Hazards and Hazardous Materials, in addition to general impact assessments under Sections 4.3, Air Quality and 4.11, Noise. The EIR also includes graphic representation of all areas within the Airport Planning Area.

Comment Number	Comment Issues	Responses
<p>Comment 4</p>	<p>The commenter suggests that the assessment of the need for residential growth in the Airport Planning Area be informed by a housing needs projection and questions the accuracy of SLOCOG population projections, and includes a question about the including of students in the need for growth since they are located on-campus. Commenter suggests using the Census as an indicator of growth. Commenter suggests the analysis of a limited residential development EIR Alternative.</p>	<p>The details of the proposed LUCE Update and the process for establishing population growth and housing needs are discussed in Section 2.0, Project Description. In addition, the project web site (www.slo2035.com) includes information on the LUCE Update decision-making process. The General Plan Background Report also includes information on the existing city land use environment with respect to population and growth. Section 4.12, Population and Housing includes a discussion of potential population growth and residential development. This includes a discussion on the use of the SLOCOG growth rate and use of the US Census. Section 6.0, Alternatives also includes the analysis of a Reduced Development Alternative, and includes a discussion of Alternatives considered but removed for further evaluation.</p>

DEPARTMENT OF TRANSPORTATION

DIVISION OF AERONAUTICS

1120 N STREET, Suite 3300

P. O. BOX 942874, MS-40

SACRAMENTO, CA 94274-0001

PHONE (916) 654-4959

FAX (916) 653-9531

TTY 711

www.dot.ca.gov



*Flex your power!
Be energy efficient!*

January 6, 2014

Ms. Kim Murry
Community Development Department
City of San Luis Obispo
919 Palm Street
San Luis Obispo, CA 93401

Dear Ms. Murry:

Re: Notice of Preparation for the City of San Luis Obispo General Plan; SCH#2013121019

The California Department of Transportation (Caltrans), Division of Aeronautics (Division), reviewed the above-referenced document with respect to airport-related noise and safety impacts and regional aviation land use planning issues pursuant to the California Environmental Quality Act (CEQA). The Division has technical expertise in the areas of airport operations safety and airport land use compatibility. We are a funding agency for airport projects and we have permit authority for public-use and special-use airports and heliports. The following comments are offered for your consideration.

The proposal is for an update to the City of San Luis Obispo General Plan Land Use and Circulation Elements.

In accordance with California Public Utilities Code (PUC) Section 21676 *et seq.*, prior to the amendment of a general plan or specific plan, or the adoption or approval of a zoning ordinance or building regulation within the planning boundary established by the airport land use commission (ALUC), the local agency shall first refer the proposed action to the ALUC.

If the ALUC determines that the proposed action is inconsistent with the airport land use compatibility plan, the referring agency shall be notified. The local agency may, after a public hearing, propose to overrule the ALUC by a two-thirds vote of its governing body after it makes specific findings. At least 45 days prior to the decision to overrule the ALUC, the local agency's governing body shall provide to the ALUC and the Division a copy of the proposed decision and findings. The Division reviews and comments on the specific findings a local government intends to use when proposing to overrule an ALUC. The Division specifically looks at the proposed findings to gauge their relationship to the overrule. Also, pursuant to the PUC 21670 *et seq.*, findings should show evidence that the local agency is minimizing "...the public's exposure to excessive noise and safety hazards within areas around public airports to the extent that these areas are not already devoted to incompatible uses."

Comment 1

General plans and elements must clearly demonstrate intent to adhere to ALUC policies to ensure compliance with compatibility criteria. Direct conflicts between mapped land use

designations in a general plan and the ALUC criteria must be eliminated. A general plan must include policies committing the city to adopt compatibility criteria essential to ensuring that such conflicts will be avoided. The criteria do not necessarily need to be spelled out in the general plan. There are a number of ways for a city or county to address the airport consistency issue, including:

- Incorporating airport compatibility policies into the update.
- Adopting an airport-combining zoning ordinance.
- Adopting an “Airport Element” into the general plan.
- Adopting the airport compatibility plan as a “stand alone” document or as a specific plan.

Comment 2

The general plan must acknowledge that until ALUC compatibility criteria are incorporated into the general plan, proposals within the airport influence area must be submitted to the ALUC for review. These provisions must be included in the general plan at a minimum for it to be considered consistent with the airport land use compatibility plan.

The proposal should also be coordinated with San Luis Obispo Airport staff to ensure its compatibility with future as well as existing airport operations.

CEQA, Public Resources Code 21096, requires the California Airport Land Use Planning Handbook (Handbook) be utilized as a resource in the preparation of environmental documents for projects within airport land use compatibility plan boundaries or if such a plan has not been adopted, within two nautical miles of an airport. The Handbook provides a “General Plan Consistency Checklist” in Table 5A and a “Possible Airport Combining Zone Components” in Table 5B. The Handbook is a resource that should be applied to all public use airports and is available on-line at:

<http://www.dot.ca.gov/hq/planning/aeronaut/documents/alucp/AirportLandUsePlanningHandbook.pdf>

Since communities vary greatly in size and character from urban to rural, the level of noise deemed acceptable in one community is not necessarily the same for another community. For most airports in California, 65 dB CNEL is considered too high a noise level to be appropriate as a standard for land use compatibility planning. This is particularly the case for evaluating new development in the vicinity of the airport. The 60 dB CNEL, or even 55 dB CNEL, may be more suitable for new development around most airports. For a further discussion of how to establish an appropriate noise level for a particular community, please refer to the Division’s Airport Land Use Planning Handbook

Business and Professions Code Section 11010 and Civil Code Sections 1102.6, 1103.4, and 1353 address buyer notification requirements for lands around airports and are available on-line at <http://www.leginfo.ca.gov/calaw.html>. Any person who intends to offer subdivided lands, common interest developments and residential properties for sale or lease within an airport influence area is required to disclose that fact to the person buying the property.

Comment 3

Land use practices that attract or sustain hazardous wildlife populations on or near airports can significantly increase the potential for wildlife-aircraft collisions. The Federal Aviation Administration (FAA) recommends that landfills, wastewater treatment facilities, surface

“Caltrans improves mobility across California”

mining, wetlands and other uses that have the potential to attract wildlife, be restricted in the vicinity of an airport. FAA Advisory Circular (AC150/5200-33B) entitled “Hazardous Wildlife Attractants on or Near Airports” and AC 150/5200-34 entitled “Construction or Establishment of Landfills near Public Airports” address these issues. For further information, please refer to the FAA website <http://wildlife-mitigation.tc.faa.gov/>. For additional information concerning wildlife damage management, you may wish to contact the United States Department of Agriculture, Wildlife Services, at (916) 979-2675.

Comment 3

These comments reflect the areas of concern to the Division with respect to airport-related noise, safety, and regional land use planning issues. We advise you to contact our District 5 office concerning surface transportation issues.

Thank you for the opportunity to review and comment on this proposal. If you have any questions, please contact me at (916) 654-6223, or by email at philip.crimmins@dot.ca.gov.

Sincerely,

Original Signed by

PHILIP CRIMMINS
Aviation Environmental Specialist

c: State Clearinghouse, San Luis Obispo County ALUC, SLO Airport

NOP Comment Responses

CalTrans Comment Letter

Comment Number	Comment Issues	Responses
Comment 1	Commenter describes ALUC authority over consistency between the LUCE Update and the ALUP and provides policies for making a consistency determination and actions to be taken for determining consistency.	Policy consistency is discussed in detail under Section 4.10, Land Use. The City will work with the ALUC on ensuring consistency between documents.
Comment 2	Commenter restates consistency requirements and provides methods to ensure consistency and stipulates the legal authority for ensuring consistency.	Refer to discussion under Comment 1.
Comment 3	Commenter states several environmental issue areas that have the potential to impact sensitive receptors near airports and issues that could potentially impact airport operations. Including noise and attracting wildlife with the potential for conflict with airport operations.	Potential development in areas that may expose sensitive receptors to excessive noise is analyzed in detail under Section 4.11, Noise. The proposed project does not include habitat restoration with the potential to attract wildlife to the airport area. Individual projects that may be developed under the LUCE Update would be evaluated for policy consistency and environmental impacts prior to permit approvals.

From: [Murry, Kim](#)
To: [Rick Rust \(rick_rust@matrixdesigngroup.com\)](mailto:rick_rust@matrixdesigngroup.com); [Celeste Werner \(celeste_werner@matrixdesigngroup.com\)](mailto:celeste_werner@matrixdesigngroup.com); [Mintier-Harnish](#); [Jeff Oliveira](#)
Cc: [Mandeville, Peggy](#)
Subject: FW: LUCE Upper Monterey Street Area Update concerns for NOP for EIR
Date: Monday, January 13, 2014 5:39:59 PM

Rick et al:
Please see these comments regarding NOP scope for the EIR. Thank you!

Kim Murry
Deputy Director, Long Range Planning
City of San Luis Obispo, Community Development
919 Palm Street
San Luis Obispo CA 93401
Ph: 805-781-7274 FAX: 805-781-7173
Web: www.slocity.org
Email: kmurry@slocity.org

-----Original Message-----

From: Debra Farwell [<mailto:dif53@earthlink.net>]
Sent: Monday, January 13, 2014 4:51 PM
To: Murry, Kim; Marx, Jan; Smith, Kathy; Carpenter, Dan; Christianson, Carlyn; Ashbaugh, John
Subject: LUCE Upper Monterey Street Area Update concerns for NOP for EIR

Kim Murry, Deputy Director
Community Development Department
City of San Luis Obispo
General Plan Land Use and Circulation Elements Update Scoping Meeting for NOP

Jan. 9, 2014

Kim,

I am submitting written comments, based on my oral presentation to the Planning Commission on Wednesday Jan. 8th. My concerns are directed toward the Upper Monterey Area LUCE Update and what appears to be a lack of knowledge about current conditions that we as neighbors, face day to day. I realize that at this point, the language for the NOP is standardized and non-specific, due to the large scope of the update. I will use the N.O.P. paperwork provided at the Dec. 7, 2013 Future Fair as a guideline for my comments. I'd appreciate it if you could please pass along my written comments to the Commission, as they consider the EIR for the LUCE Update. I appreciate your time and consideration. I will e-mail my comments on the City Council myself, to save you some time.

On page 1, Notice of Completion & Environmental Document Transmittal, dated 12/2/13, the second section, Project Location. Please note "Waterways" with San Luis Obispo Creek and Chorro Creek listed. I'd like to point out that there is a small (depending upon drought) year-round creek, which crosses our property. I believe that the source for the creek is along the foothills of the Cal Poly Grand Ave entry, along Slack St. It travels toward Hwy 101, to cross Wilson St. and behind houses along Park. It crosses behind VFW Hall on Mill St. near the Vet's Building. It crosses Palm St. and travels across resident property lines and can be found next to Frank's Hot Dogs on Monterey St. and California. I believe it passes along Monterey St. down to join San Luis Creek at the concrete culverts near the Anderson Hotel. Street run-off and gutter drainage passes directly into this small local creek, finding its' way eventually into the downtown creek system.

While "no zoning changes have been proposed", the language of the Update reflects an intent to increase the density of hotels, restaurants and a possible conference center along the Upper Monterey

Comment 1

Corridor. With increased density, there will be more hazardous materials discharged into our creek. Increased garbage storage, auto drainage on streets, air and dust pollution will be washed by surface water into the creek in our neighborhood, to join the larger San Luis Creek.

During my lifetime, I've lived closely to the creeks in my neighborhood. I've lived here on Palm St. for 39 years, next to our small creek. In 1971-1972 I lived over Muzio's Grocery Store in Downtown San Luis. We spent a good deal of time listening to the frogs in the creek in front of the Mission. Since the 70's there has been a significant decrease in the Summer frog chorus downtown and on our own property. Frogs have been considered the "canary in the coalmine", by some environmental researchers. Please address supportive biological environments as required in the Biological Resources section of the EIR in relation to frogs and other impacted fauna.

Comment 1

My second point of concern about the LUCE for the Upper Monterey Street Area is noise. In addition to auto traffic, the music of restaurants, impacts our environment. Frank's Hot Dogs have 2 speakers facing the outside eating patio. The "canned music" is audible about 1/2 a block away on Monterey and California. Daily sound volume and wind are factors in how far the sound travels. Add to that, the traffic noise. An additional source of loud noise and dust, are the "professional" landscape maintenance, which blows clean the businesses along Monterey and California. An increasing number of businesses and landlord's, use the "blow and go" type of landscaping. Noise is a Potential Environmental Impact, which needs to be assessed, in the EIR for the LUCE Update. Please address this very intrusive factor that we who live on the Monterey Street corridor live with daily.

Comment 2

My third concern is related to restaurant and business garbage within the Upper Monterey Street Area. Over the last 5 years, the numbers of raccoons, opossums and rats have been increasing. These critters get into the numerous garbage containers along Monterey Street and use the creek as a transportation system. With the blessing of US Fish and Wildlife, I trapped 5 raccoons myself, between November and December. The raccoons killed one opossum and I trapped another. I still have raccoons coming in at night. The rats are a constant. The garbage containers are left open, wet garbage leaks out through the container onto the pavement, which can wash into the gutter system. The critters are destructive, digging and destroying landscaping. In additional, they are a health hazard. Please consider the impact that restaurant and business garbage has on the surrounding neighborhood, within the Hazardous Materials section of the EIR.

Comment 3

Under the Aesthetics section of potential environmental impacts, light and glare is addressed. Currently the Lamplighter Hotel has security lights facing away from the hotel into the parking lot, due to vandalism and concerns of theft. They shine away from the hotel into the windows of the residence across the street. The neighbor has unsuccessfully approached the hotel in attempts to have the lights turned away from the house. Due to terrain, the Lamplighter Hotel towers about 4 stories above our homes, if one is standing on the corner, of Grove and Palm St. Security lights are rotated outwards, but the lights shine for quite a distance beyond the hotel. When we first moved into our home, we could see the Milky Way. Now, we are lucky if we can see the brightest stars/planets. Light pollution needs to be addressed in the EIR, with the current and any future density that is considered.

Comment 4

View shed has been greatly reduced during the last decade on our 2 blocks of Palm Street. We used to be able to see mountains to the East and to the West from our home. Now, we have lost all view to the West and partial view to the East. A two story house was built to the West. We were assured that there would be no impact. However, due to the foundation being raised for flood purposes, and over height ceilings, we lost our view from our sun porch. Positioned on a slope, the Lamplighter Motel renovation extends 4 stories. It has a huge impact on the neighborhood view shed. I am concerned about any remodels that extend upward, blocking both sunshine and view to our neighborhood. Please consider the impact of buildings, which block the view or sunlight of pre-existing residences. This hasn't been taken into account in the past, leaving us with visual blights.

There is no mention of the environmental impact of odor into a residential neighborhood. This is a huge issue for those of us living along Palm Street. Starting around 6 AM, Franks' starts breakfast with onions and bacon cooking. As the day progresses, the smells are of hamburger and sometimes rancid grease. Depending on the wind, it is possible to detect odors from the railroad tracks on Palm, to Grove Street at Monterey. I have a lovely garden, but when I walk outside, it isn't my flowers I smell. It is onions, bacon and burgers from Franks'. All of my neighbors have complained as well. It is nauseating,

Comment 5

to smell the odors every day. One can smell bread from Splash Cafe and Mexican food from Pepe Delgados walking along Monterey Street. By far, Franks' odors travel the farthest and are the most constant. For the neighbors with 2-story homes, the odors seem to enter their higher windows easier. While odor isn't directly listed on the N.O.P. Potential Environmental Impacts to be Assessed, please discuss odors related to restaurant food prep and garbage storage. Being able to enjoy our homes and gardens is directly effected by the smells in the air around us. Increasing hotel, restaurants and possible conference center density, will make it worse, if the current problems aren't mitigated.

Comment 5

I appreciate your consideration of these concerns. Increased traffic will make the intersection at California and Monterey Street even less safe. It has limited visibility and some high-speed traffic. Bikes, skateboards, pedestrians, food delivery trucks and autos all share a very small space. In walking through our neighborhood, it appears that very little forethought was used in creating a residential and business community. This is a good opportunity to improve upon the mistakes that were made in the past. Thank you for allowing our input into the process.

Comment 6

Debbie Farwell
Palm Street

NOP Comment Responses

Public Comment Letter (Farwell)

Comment Number	Comment Issues	Responses
Comment 1	Commenter describes a small seasonal drainage on their property and environmental concerns for increased development in the Upper (north) Monterey Street area.	Please refer to Section 4.4, Biological Resources, for a detailed discussion of potential impacts to waterways and City policies addressing impacts to creeks and wetlands.
Comment 2	Commenter states existing noise impacts related to existing businesses and landscape maintenance in the Upper Monterey Street area.	Section 4.11, Noise, of the EIR includes a detailed discussion of City noise policies and requirements to meet community noise standards.
Comment 3	Commenter states existing issues with garbage storage for businesses in the Upper Monterey Street area, stating health hazards and wildlife/vector attractants.	Health concerns related to restaurants are addressed through the Public Health Department.
Comment 4	Commenter states concerns regarding existing impacts related to nighttime lighting and the blocking of views resulting from current development.	Policies relating to aesthetic impacts are discussed in detail under Section 4.1, Aesthetics. Policy consistency is addressed as individual projects are proposed.
Comment 5	Commenter states concerns regarding the odors from existing restaurants along the Upper Monterey Area.	Odor policies are discussed under Section 4.3, Air Quality. Complaints regarding existing conditions should be directed to the City Community Development Department.
Comment 6	Commenter states concerns related to traffic impacts at the intersection of California Boulevard and Monterey Street.	Please refer to Section 4.15, Traffic and Circulation, for a detailed review of existing traffic conditions citywide, including potential impacts related to implementation of the LUCE Update.

From: [Murry, Kim](#)
To: [Rick Rust \(rick_rust@matrixdesigngroup.com\)](mailto:rick_rust@matrixdesigngroup.com); [Jeff Oliveira](#)
Cc: [Mandeville, Peggy](#)
Subject: FW: Public Comments on LUCE EIR
Date: Friday, January 24, 2014 8:13:13 AM

Comments on the NOP.

Kim Murry
Deputy Director, Long Range Planning
City of San Luis Obispo, Community Development
919 Palm Street
San Luis Obispo CA 93401
Ph: 805-781-7274 FAX: 805-781-7173
Web: www.slocity.org
Email: kmurry@slocity.org

From: Cindy Jacinth [mailto:cindyjacinth@gmail.com]
Sent: Thursday, January 23, 2014 10:31 PM
To: Murry, Kim
Subject: Public Comments on LUCE EIR

Hi Kim,

The City's main page of the website says "As part of the Land Use and Circulation Elements (LUCE) update, the City is preparing an Environmental Impact Report (EIR) that will analyze project alternatives and potential environmental impacts. The [Notice of Preparation](#) summarizes anticipated issues to be analyzed as part of the EIR.

Comments regarding the scope and content of the EIR are requested by January 24, 2014. Visit www.slo2035.com and scroll down to Notice of Preparation (NOP) to submit comments."

However, when I click on the slo2035 website link, it takes me to a page that says comments are due by January 20th. Since the City has a discrepancy on when comments are due (20th or 24th?) and since today is the 23rd, I ask that the City include my comments:

Regarding the Notice of Preparation, I am opposed to circulation changes in the South Broad Street area which would involve new no-left turns from Broad onto Mitchell, Broad onto Caudill and Broad onto Woodbridge. I am concerned about the impacts of diverting collector traffic onto residential streets (namely Lawrence and Funston). Particularly Lawrence, which for northbound traffic turning into this residential development would negatively impact traffic onto a narrow residential street and funnel traffic from Lawrence to Chandler and Tenbrook Streets. I am concerned about impacts to increased traffic, noise and pedestrian safety and encourage the City to include these issues in the EIR and reconsider proposals for no-left turns.

Comment 1

Thank you for including my comments.

Cindy Jacinth
SLO Resident of Broad Street area

NOP Comment Responses

Public Comment Letter (Jacinth)

Comment Number	Comment Issues	Responses
Comment 1	Commenter states concern regarding potential left turn lanes in the South Broad Street area, and potentially diverting collector traffic to residential streets.	Please refer to Section 4.15, Traffic and Circulation, for a detailed discussion of potential city circulation improvements, regulations, policies and potential impacts.

From: [Rick Rust](#)
To: [Jeff Oliveira](#); [Honey Walters](#)
Cc: [Celeste Werner](#); [Larry Mintier](#); [Rick Rust](#)
Subject: Fwd: Feedback - Notice of Preparation:LUCE
Date: Wednesday, January 01, 2014 1:52:49 PM

Jeff / Honey,

NOP comments for your tracking, use.

Rick Rust, AICP
Sent from my iPhone

Begin forwarded message:

From: "Murry, Kim" <kmurry@slocity.org>
Date: January 1, 2014 at 1:18:40 PM PST
To: Rick Rust <rick_rust@matrixdesigngroup.com>
Subject: Fwd: Feedback - Notice of Preparation:LUCE

Can you please forward this to Jeff Oliveira? Thanks.

Kim Murry
Sent from my Verizon Wireless phone

----- Forwarded message -----

From: "Mila Vujovich-LaBarre" <milavu@hotmail.com>
To: "Mejia, Anthony" <amejia@slocity.org>, "Murry, Kim" <kmurry@slocity.org>
Cc: "rosemary" <rwilvert@sbcglobal.net>, "eric prater" <eprater@slcusd.org>, "jcalandro@slcusd.org" <jcalandro@slcusd.org>, "adam hill" <achill29@hotmail.com>
Subject: Feedback - Notice of Preparation:LUCE
Date: Fri, Dec 27, 2013 4:43 pm

December 27, 2013

Mayor Jan Marx and San Luis Obispo City Council Members

City Hall

990 Palm Street

San Luis Obispo, California 93401

E-mail: amejia@slocity.org

Kim Murry

Deputy Director, Community Development Department

City of San Luis Obispo

919 Palm Street

San Luis Obispo, California 93401

Email: kmurry@slocity.org

Dear Mayor Marx, Members of the San Luis Obispo City Council and Ms. Murry,

The comments below are in regard to the Notice of Preparation (NOP) for the findings of the Land Use Circulation Element (LUCE) document. Please forward them to the appropriate parties including the contracted individual who is executing the Environmental Impact Report (EIR) for LUCE so that they become part of the official, documented feedback.

Although I wrote down some of these concerns on the comment cards presented at the last LUCE Community Forum in December 2013, I wanted to make sure that these concerns were addressed in the upcoming LUCE EIR.

Prado Road

Prado Road is delineated in the LUCE document on numerous occasions and designated as a four-lane truck highway. The preliminary design had this road with round-a-bouts through new residential and new commercial development in the Margarita Area. Originally, the construction of the Northern Alignment of Prado Road also included a pedestrian tunnel from the Damon-Garcia Sports Fields to the new neighborhoods. Neither a round-a-bout nor that tunnel is obvious to me in the LUCE documents that I reviewed. Are they still being considered?

Through the LUCE EIR process, I would like to have a comprehensive EIR of Prado Road from Broad Street to Madonna Road executed. Prado Road, as an East-West cross-town connection, has indeed been on City

Comment 1

documents since the 1960's.

The EIR should include the adopted Northern Alignment of Prado Road and examine acceptable alternatives to the Northern Alignment. The EIR should also examine the health and safety factors of having the Damon-Garcia Sports Complex adjacent to the proposed, four-lane truck highway.

The additional stoplight on Broad Street, in between Industrial Way and Orcutt Road, will have trucks idling on Broad Street preparing to turn on Prado Road and idling trucks on Prado Road, preparing to turn on Broad Street. It seems that since the sports fields are downwind from the planned Northern Alignment of Prado Road that there may be safer alternatives. In my opinion, the safer alternatives include a connection to Industrial Way, which is already signalized, or to an aligned Santa Fe Road connected to a widened Tank Farm Road. Both of those alternatives could be examined in the comprehensive EIR of Prado Road.

Comment 1

My desire for a comprehensive EIR of Prado Road is based on the information from Curtin's Land Use and Planning Law. It states, "In Citizens Association, the court held that 'chopping up' a large project into many little ones, each with minimal impact on the environment, with the use of negative declarations, did not comply with CEQA, as it would result in overlooking the cumulative environmental consequences, which could be disastrous. Citizens Association, 172 Cal.App. 3d at 151."

Prado Road should not be analyzed in pieces, especially since it is cemented in the LUCE document as a four-lane truck highway. A proper analysis now would provide feasible mitigation measures and/or alternate routes.

Still on the subject of Prado Road is the interchange at Highway 101. In the LUCE document it states that this matter has been forwarded to Caltrans for review. It seems that the review from Caltrans is critical at this time as one examines the proposed circulation element. In my past conversations with Caltrans personnel, I have been told that an interchange at Prado Road would not be feasible given its proximity to both the Madonna Road interchange and the Los Osos Valley Road interchange. It seems that an expedited review from Caltrans would help a lot of people make plans for the future and save a substantial amount of tax dollars.

In the unlikely event that a Prado Road interchange is fully condoned, it seems that entities such as representatives from the San Luis Obispo Homeless Services should be notified immediately, since their personnel are currently examining the viability of a new Homeless Shelter on Prado Road adjacent to the current Sunset Drive-In. If the Prado Road interchange is approved, it seems that a new, expanded Homeless Service Shelter would be best located on the donated land on South Higuera, not on Prado Road.

A comprehensive EIR of Prado Road will also indicate whether or not the public will best be served by a four-lane overpass for trucks, cars, bicyclists and pedestrians, or an interchange. Since the "Dalidio" property is now under new ownership, this information will be beneficial for that party as well.

Comment 1

The other Prado Road consideration is the archaeological site that is adjacent to the Damon -Garcia Sports Fields near the family farmhouse on Broad Street. The archaeological site has been recognized by local tribes and is designated in the formal Native American registry. A four-lane truck highway will undoubtedly destroy at least 50% of this site. It seems that here are viable alternatives to protect this site. Maybe the seven acres of land reserved for the extension of Prado Road would best serve the public as a parking lot and/or recreation area? This would maintain the connection of the Damon-Garcia Sports Fields to the South Hills Open Space and direct Prado Road to a widened Tank Farm Road at the aligned Santa Fe or the already signalized Industrial Way.

As my cohort Rosemary Wilvert and I indicated in a letter to the City Council and other parties in May 2013, after an EIR is completed maybe the best decision will be to move the Damon-Garcia Sports Fields to another location in the City of San Luis Obispo. That way Prado Road could be built properly, without having to worry about the health and safety of athletes and individuals who enjoy that area for recreation, or the integrity of the archaeological site.

Chevron Remediation

The Chevron remediation will open up alternatives for both roads and land use. Since the land is still in the County, I understand that the land use and circulation options there could not be fully addressed in the city's LUCE document. However it seems that with the proposed recreation on the Chevron land, the four-lane expansion of Tank Farm Road, complete with bike lanes, and the Class -1 bike lanes that are proposed tangent to the new development along Santa Fe Road, that the Chevron remediation should be included at least as an addendum to the LUCE document.

Comment 2

The Chevron remediation also includes a proposed 800,000 square foot commercial building at the intersection of Santa Fe and Tank Farm Road that should be noted somewhere as well. The ingress and egress to and from that commercial space will undoubtedly impact traffic and circulation in the City of San Luis Obispo, especially on Tank Farm Road, Santa Fe Road and the Broad Street corridor.

Chevron also proposes to nearly level the area known as the "flower mounds," the visible hills adjacent to the Damon-Garcia Sports Fields at the end of Industrial Way to a 3% grade, making available new road alternatives and areas for Class-1 bike lanes. That improvement is not noted in the LUCE document since the land is in the County, however it could be noted in an addendum as well.

Comment 2

The Chevron remediation also proposes approximately ten acres of land for recreation along Tank Farm Road, specifically for Cal Ripken ball fields. In communication to Chevron personnel, I have proposed that area be placed closer and actually adjacent to the Damon-Garcia Sports Fields to create a "Central Park" feel to that area of town, and to make life easier for families in the next generation.

Schools

During the LUCE process some holdings by the San Luis Coastal Unified School District (SLCUSD) were withheld for consideration towards the end of LUCE discussions. That being noted, where are the proposed schools in the LUCE document? Will the current schools support the newly planned residences allegedly for young families? Does the infrastructure of walking and biking paths support student accessibility to neighborhood schools?

Comment 3

Johnson Avenue Project

It has come to my attention that the SLCUSD has been in contact with the City of San Luis Obispo in regard to the property roughly at the intersection of Johnson Avenue at San Luis Drive. It seems that that property should be a part of the LUCE discussion. The SLCUSD has already spent roughly \$350,000 on plans and evaluation of this development yet I did not see it mentioned in the LUCE documents.

Comment 4

San Luis Drive residents have commented that they are concerned about the proposed 88 residential units for that site given the traffic already in

the area. My concern is that I think the area may be best suited for an expanded educational site or a business complex. It seems that the SLCUSD would benefit from the expertise of the LUCE EIR if it is dedicated to developing this property in the next decade to enhance much-needed, public school revenues. I think that the SLCUSD personnel should be invited to become a part of the city plan and dialogue in order to facilitate their decisions.

Comment 4

Emergency Services

Perhaps I missed it but it seems that additional emergency services will be needed in proximity to the Margarita Area and Airport Area given the proposed build out.

Comment 5

I did not see them noted in the land use element. Are the current emergency services adequate?

Current Pacific Beach High School site

The LUCE Committee has the SLCUSD held Pacific Beach High School site on Los Osos Valley Road slated for more commercial development. It seems that it would be in the best interest of the community for this area to be developed as Section 8 housing, senior housing or affordable housing for the significant amount of workers in the area. The housing with a neighborhood park seems like it would meld better with the existing Laguna Lake neighborhood, rather than additional commercial development. There are functional bus lines and bike lanes for individuals who want to or need to access public transportation. The revenue generated for the SLCUSD may be a deciding factor on why they would prefer commercial development there instead of housing. It just seems that the LUCE EIR could analyze now what mitigations would need to be taken to complete one design or the other.

Comment 6

The Dalidio Development

The agricultural area previously known as the Dalidio development is now under new ownership. I was heartened to see that any new proposed development will be in an elongated rectangle of sorts, east of the current post office and adjacent to the current Embassy Suites parking lot, rather than in a mass across the visible tree line. This configuration will preserve the vista of our local mountains, the trees and agricultural land that is treasured by locals and tourists alike. It will also ensure that the "Dalidio" agricultural area is directly adjacent to the SLO City Farm that is in its infancy.

Comment 7

It would be wonderful to see in the LUCE EIR a connection with the

Laguna Lake recreation area so that if and when the land is ever developed commercially and annexed into the City, that the new commercial development will facilitate ease of mobility for people for all ages and abilities in our City from the commercial area to the recreation area and open space.

Although I still question the long-term logic of pouring cement and building commercial and/or residential development on even half of the 131-acres of prime agricultural land that sits on top of an accessible emergency water supply, I do acknowledge the rights of the new property owner. If the members of LUCE and city officials think that type of development is best for the next generation in 2035, then I will abide by the decision of the majority.

Comment 7

Again, the new property owner will undoubtedly benefit from the previously requested comprehensive EIR of Prado Road to calculate the developer's financial share of the construction of the Prado Road interchange or overpass.

Recreation

It was my understanding that the City goals included not just maintenance of, but an increase in, accessible areas to recreate. In the LUCE documents, I did not see an increase in designated recreation areas in the Broad Street corridor or any of the other areas, with the exception of bike paths. Given the proximity of the proposed Prado Road to the Damon-Garcia Sports Fields, instead I see current areas for recreation being infringed upon. Please clarify where the new and improved areas for recreation are that balances the proposed development.

Comment 8

Thank you for all of your hard work in making San Luis Obispo the best it can be now and for the future generations.

Sincerely,

Mila Vujovich-La Barre

Mila Vujovich-La Barre

650 Skyline Drive

San Luis Obispo, California 93405

E-mail: milavu@hotmail.com

NOP Comment Responses

Public Comment Letter (La Barre)

Comment Number	Comment Issues	Responses
Comment 1	Commenter states concerns regarding the potential future development of improvements to Prado Road. Commenter asks if Prado Road improvements are included in the LUCE Update and requests a comprehensive EIR for the extension of Prado Road from Broad Street to Madonna Road that covers all impact issue areas.	Please refer to Section 4.15, Traffic and Circulation, for a detailed discussion of potential city circulation improvements, regulations, policies and potential impacts. Please note that as future circulation improvements are proposed for actual construction, individual projects will be reviewed for impacts and policy consistency as development is proposed.
Comment 2	The commenter requests that the Chevron Tank Farm Remediation and Redevelopment EIR be included as an appendix to the LUCE Update EIR and states concerns regarding compatibility between land uses and the expansion of Tank Farm road as proposed under that project.	While considered as part of existing city development under the LUCE Update EIR cumulative impact analysis, the details of the Chevron project have been analyzed in the EIR prepared for that project.
Comment 3	The commenter asks if impacts to schools will be analyzed in this EIR.	Please refer to Section 4.13, Public Services, for a detailed discussion of impacts to schools as a result of buildout of the proposed LUCE Update.
Comment 4	The commenter states concerns regarding the potential Johnson Avenue development project and impacts that may result, and provides recommendations for future development of this site.	Impacts related to other projects do not fall under the preveue of this EIR. At this time, it is our understanding that the plans for the Johnson Avenue project have been withdrawn by the SLCUSD. If a new project is proposed, it will be analyzed in a separate environmental determination.

San Luis Obispo General Plan Update

Comment Number	Comment Issues	Responses
Comment 5	The commenter states concerns regarding the provision of emergency services for potential development in the Margarita and Airport areas.	Impacts related to the provision of emergency services are discussed in detail under Section 4.13, Public Services.
Comment 6	The commenter states that the potential future development of the Pacific Beach High School site would be best served by shifting to more residential development versus commercial development.	The consideration for the future development of this site was considered by the City and the LUCE Task Force during development of the LUCE Update. Please note that as potential future projects are proposed under the LUCE Update, each project would be reviewed for consistency with City policies and environmental impacts once a project is proposed and prior to permit approvals.
Comment 7	The commenter requests an analysis for connectivity between the Laguna Lake open space and adjacent commercial and potential residential development at the Dalidio property and acquiesces to the likelihood of development in this area.	In the event that new development is proposed in this area, issues related to alternative transportation and connectivity will be addressed through the required environmental review. Impacts related to potential circulation improvement under the LUCE Update are discussed in detail Section 4.15, Traffic and Circulation.
Comment 8	The commenter asks if the proposed project will increase recreational opportunities in the city and states concerns with buildout impacts to existing recreational facilities in the South Broad Street area.	Impacts related to recreation as a result of the LUCE Update are discussed in Section 4.14, Recreation. Buildout of the LUCE Update would slightly improve the city's current parks-to-people ratio. As future circulation improvements and buildout projects are proposed, their impacts related to recreation will be analyzed for consistency with City policies and potential impacts.



895 Monterey Street
San Luis Obispo, CA
93401-3278
Ermina Karim, President/CEO

January 24, 2014

Honorable Mayor and Council Members
City of San Luis Obispo
990 Palm St.
San Luis Obispo, CA 93401

Subject: Recommendation re. LUCE EIR

Dear Mayor Marx and City Council Members,

The San Luis Obispo Chamber of Commerce appreciates the opportunity to continue our participation in the City’s important Land Use & Circulation Element (LUCE) update. This update is the community’s opportunity to address current inequities regarding available housing, opportunities for economic growth, infrastructure for all modes of transportation, and address gaps for much needed community amenities. The amendments to the LUCE will provide important guidance for the coming decades of community development.

As such, the Chamber would like to provide some additional comments that specifically address the critical need for additional housing capacity in our city. We are certainly not alone in recognizing the benefits of adequately accommodating those who wish to work and live in the same community. The lack of housing available for our workforce is consistently among the top needs identified by residents in annual city surveys; it is the long-standing top business challenge for local employers of all sizes; and it is the chief contributor to greenhouse gas emissions in our region.

We have asked throughout this process that the City’s jobs-housing goals as identified in numerous documents -- including the General Plan Annual Report, Climate Action Plan, and Economic Development Strategic Plan -- be more specifically addressed in the LUCE update. The city’s stated jobs-housing target is 1.5 jobs per housing unit; according to the city’s own reports, it appears that we are currently at an approximately 1.8 jobs-to-housing ratio. This performance gap is merely maintained in the current LUCE document.

While our community may not achieve its target ideal balance, identifying potential tools to move us closer to this goal and understanding the implications of these tools is critical so that wise future planning decisions can be made. For this reason, the Chamber would like to submit the following suggestions for consideration with the scope of the LUCE environmental impact report (EIR):

- 1. Building Heights: After careful analysis of all the planning areas within the LUCE document, we have identified specific areas where additional building height may be appropriate to increase the availability of housing while discouraging sprawl. There are many considerations when increasing building height, such as impacts to view shed, however the EIR process can help identify impacts for

Comment
1

T 805.781.2670
F 805.543.1255
E slochamber@slochamber.org

slochamber.org
visitslo.com
slo-business.com

future decision making. In some instances, the existing language already supports potential building height adjustments. Our request is intended to provide more specific direction to the EIR consultant in order to yield more beneficial analysis. While we are not specifically supporting heights to increase in each of these areas at this time, we want this topic to be studied within the scope of the EIR so that the community can make informed decisions long into the future. We have attached specific recommendations to this letter for consideration (See addendum).

**Comment
1**

2. The Chamber requests the City to consider a program to study height limits citywide and modernize zoning regulations to reflect these updates.

3. We urge that the City direct the EIR consultant to study an alternative in the program EIR that produces specifically the City's own goal of a jobs/housing ratio of 1.5:1.

**Comment
2**

It is imperative that the LUCE addresses our jobs-housing imbalance so that we can strive to minimize it over time. The jobs-housing relationship is at the heart of AB 32 and AB 375, the funding source of the Sustainable Communities Grant for this LUCE update. We urge you to more meaningfully address this inequity and request that you incorporate the study of the items identified above and in the attached language within the scope of the EIR so that we can move one step closer to our collective goal of improving San Luis Obispo economically, socially and environmentally.

In conclusion, the Chamber would like to thank the City for embarking on this important undertaking and we appreciate the spirit of open collaboration shown us to date.

Thank you for your consideration.

Sincerely,



Stacey White, Chair
SLO Chamber of Commerce LUCE Task Force

Cc: Eric Meyer, Chairperson, LUCE Task Force
Michael Drazee, Chairperson, City of San Luis Obispo Planning Commission
Kim Murry, Deputy Director, Community Development Department

Addendum: Recommendations for Study within the Scope of the LUCE EIR

1.4 Jobs/Housing Relationship

Recommendation for study: Add additional language to the jobs/housing policy

The gap between housing demand (due to more job and college enrollment) and supply should not increase. The City shall strive to improve the gap between jobs and housing from the 2014 ratio of 1.8:1 towards the target of 1.5:1.

Caltrans Site

Recommendation for study: Increase height from 45 to 60 ft.

While this area is within the Mid-Higuera Area, the unique qualities and opportunities provided by the site warranted special consideration in the General Plan. This area is planned for redevelopment from a Caltrans office and yard complex to a mixed use development. Commercial uses will be as described under the Tourist Commercial designation with some residential incorporated using a Medium High to High Density Residential component. Redevelopment plans shall consider the suitability of realignment of the Madonna/South Higuera intersection. The site should be developed to serve as a gateway into the community, with consideration of additional open space uses, retention and rehabilitation of the Master List historic structure, and retention of Heritage Trees on the site. Conference center-type uses are encouraged along with other appropriate tourist-serving uses as appropriate for the site.... Building height adjustments in this area can also be considered up to 60 feet with mixed use development.

Foothill Boulevard / Santa Rosa Area

Recommendation for study: Increase height from 45 to 60 ft.

This area, which includes land on both sides of Foothill Boulevard between Chorro and Santa Rosa, is currently developed as commercial centers that include highway and neighborhood serving commercial uses. At the affected property owners' request, the boundary of this area on the north side of Foothill maybe extended to include one or more of the existing commercial properties west of Chorro Street. The City shall work with property owners/developers to redevelop the area as mixed use (either horizontal or vertical mixed use) to include a mix of uses as described under the Neighborhood Commercial, Community Commercial and Medium High to High Density Residential designations.

Building height adjustments up to 60 feet in this area can also be considered with mixed use development that provides additional residential housing.

Upper Monterey

Recommendation for study: Add a section "i" to the list of actions in this area, with consideration of an increased height limit from 45 to 60 ft. in the area closer to Downtown

- i. Consider building height adjustments up to 60 feet with mixed use development in the lower Monterey area defined as Santa Rosa St. to California Blvd.

Mid-Higuera Area

Recommendation for study: Increase from 35-45 ft. to 60 ft.

The City will update the plan for this multi-block commercial area to reflect current needs and changes that have occurred since the 2001 plan was adopted. Building height adjustments up to 60 feet in this area can also be considered with mixed use development.

Broad Street at Tank Farm Road Site

Recommendation for study: Increase height from 35 to 50 ft.

Located at the northwest corner of Board Street and Tank Farm Road, this approximate 10 acre site will be used as a mixed use site, providing for a mix of uses as described under the Community Commercial and Office designations and residential limited to upper floors. Building height adjustments in this area can also be considered up to 50 feet. Areas along the creek on the western edge of the site will be appropriately buffered to provide creek protections. Attention to connectivity and comfort of bicycle and pedestrian circulation will be especially important in the development of this corner.

Building Height (Downtown)

Recommendation for study: Increase height from 50 to 60 ft. for new buildings; increase height from 50 to 75 to 60 to 75 ft. for taller buildings

New buildings shall fit within the context and vertical scale of existing development, shall not obstruct views from, or sunlight to, publicly-owned gathering places such as Mission Plaza, and should be stepped back above the second or third level to maintain a street façade that is consistent with the historic pattern of development. Generally, new buildings should not exceed 60 feet in height. Tall buildings (60-75 feet) shall be designed to achieve multiple policy objectives, including design amenities, housing and retail land uses, such as:

- Publicly accessible, open viewing spaces at the upper levels
- Housing affordability in excess of the Inclusionary Housing Requirement
- Energy efficiency beyond State mandated requirements
- Adaptive reuse of a historical resource in a manner consistent with the Secretary of the Interior's Standards for Rehabilitation
- High residential density (e.g. above 24 units per acre) achieved by a concentration of smaller dwelling units
- Street level features such as a public plaza, public seating and/or public art
- Increased retail floor area, including multi-story retail
- Directly implements specific and identifiable City objectives, as set forth in the General Plan, the Conceptual Plan for the City's Center, the Downtown Strategic Plan and other key policy documents
- Receiving Transfer of Development Credits for open space protection or historic preservation
- Provide midblock or other significant pedestrian connections

Margarita Area Specific Plan Update

Recommendation for study: Add back more specific target for study that reflects prior project plans

Location: The Margarita Area covers about 420 acres bounded by South Higuera Street, Broad Street, Tank Farm Road, and the ridge of the South Street Hills in the southern portion of San Luis Obispo.

Purpose: Adopted in October 2004, the Margarita Area Specific Plan contains five key principles: open space and sensitive resource production, cohesive neighborhood creation, transit supporting land uses and densities, pedestrian environment, and minimizing infrastructure costs.

The approved specific plan includes 868 residential dwelling units, as well as a business park, a neighborhood park, sports fields, and open space areas. Over 40 percent of the land area is designated as open space and 56 acres are designated as parks.

The City shall consider this area as potentially appropriate to accommodate additional housing **up to 1,200 units**. Revision to the Margarita Area Specific Plan will be require if residential development in excess of that accommodated in the plan is proposed.

NOP Comment Responses

San Luis Obispo Chamber of Commerce Comment Letter

Comment Number	Comment Issues	Responses
Comment 1	<p>Commenter states concerns regarding City policies concerning building height limits and their relationship to limiting development intended to reach stated jobs/housing goals. The comment letter includes an addendum that provides specific recommendations for area-specific revisions to existing building height requirements, this also includes a request to increase residential densities planned for the Margarita Area Specific Plan.</p>	<p>The details of the LUCE Update were reviewed by City staff and the LUCE Task Force, and adopted by the City Council. The result of this review is the currently proposed LUCE Update, which is being analyzed for environmental impacts through this EIR. The analysis in this EIR is limited to the changes made to the existing Land Use and Circulation Elements as a result of the proposed LUCE Update. Requests for further amendments to the LUCE Update will be considered through the project decision-making process. If additional changes to city land uses are proposed for addition to the LUCE Update, the EIR will analyze those changes as proposed by the City Council.</p>
Comment 2	<p>The commenter requests that the EIR include a study for an alternative that meets the City's jobs/housing ration of 1.5:1. The comment letter also includes an addendum that requests amendments to the City's policies for a jobs/housing balance.</p>	<p>With respect to the EIR analysis, please refer to the discussion under Comment 1 above. It should be noted that the residential development proposed under the LUCE Update was designed to address the City's goals with respect to achieving the jobs/housing balance, including the development of the EIR Alternatives.</p>

This page left intentionally blank