Comments on the Los Osos Community Plan by R. D. Bowlus 9/28/2020

In my comments to the Planning Commission on 8/13,2020, I said that I had mistakenly sent comments noting errors and omissions to the LOCP EIR in December 2019, rather than to the LOCP, and that my comments were mostly dismissed as insignificant details.

I have now rewritten those comments so they apply to the LOCP itself, where I believe they ARE NOT insignificant. I regret that it has taken me more than an month to revise them and submit them to you. I hope that my suggested revisions, especially those containing "ground truth," can still be incorporated in the LOCP before the document is approved by the Planning Commission and/or before the LOCP is approved by the Board of Supervisors and Coastal Commission.

Page references apply to the LOCP document entitled "Complete-indexed-PHD-LOCP"

1.4, P. 1-4, pdf p. 23 "The Morro Bay estuary, one of the largest and most important wetland systems in the Central Coast, bounds the community on the northwest."

Suggested revision: The Morro Bay estuary, one of the largest and most important wetland systems in the Central Coast, bounds borders the community on the north, northwest, and west.

Comment: All of the back bay is part of the Morro Bay Estuary.

Planning Staff comments – This change can be made.

1.4, P. 1-4, pdf p. 23 "Los Osos possesses scenic beauty, a mild coastal climate, and natural resources that contribute to a high quality of life. These assets also present opportunities to improve jobs and services for local residents and to improve recreation and tourist-oriented uses for both locals and visitors."

Suggested revision: "Los Osos possesses scenic beauty, a mild coastal climate, and natural resources that contribute to a high quality of life. These assets also present opportunities to improve jobs and services for local residents and to improve recreation and tourist-oriented uses for both locals and visitors.

[New Paragraph] "An especially noteworthy attribute of Los Osos is its waterfront, protected from ocean waves by the sand spit. Pasadena Avenue Coastal Access has Morro Bay's only long sand beach, one of only two easily accessible sand beaches inside the bay. Longer sand beaches on the sandspit can only be reached by a long hike or by boat. Los Osos is the only place in Morro Bay with direct access to water ideally suited for small boats and for young or novice boaters; water free of hazards like strong currents, heavy motorboat traffic, and crowded boat mooring. Nowhere else on California's Central Coast is there another such bay, calm and wide-open for small boats yet small enough and shallow enough to exclude big boat traffic. Lakes and reservoirs, operated as parks with entry fees and known for having unpredictable winds, are the only other places one can use small boats on protected waters for hundreds of miles in all directions; yet such a bay is Los Osos' "front yard". Two more special features of Los Osos' back bay: First, boating is strictly governed by the tides because it empties and becomes a mud flat at low tide. Second, across the bay is the sandspit. A sail or paddle across to picnic or play on the dunes is always a recreational delight." [A much abbreviated version is on the next page.]

Or, here's what they added to the EIR (4.12.1, FEIR p. 4.12-1, pdf p. 432) in response to my comments:

"Notably, the shoreline access in the Baywood area is a unique coastal recreational amenity in the vicinity of Morro Bay and the Central Coast in general, offering calm water access free from hazards such as strong currents, motorboat traffic, and boat moorings."

Comment: Coastal access to a calm bay shore and waters is a special attribute of our town that impacts statements on many LOCP pages where recreational and environmental access and nature oriented activities are described. How special is our access to this bay? Along the shoreline of Morro Bay there is no other extensive sandy beach (unless one can hike or boat to the sandspit), nor is there any place else on Morro Bay with water that is free of strong currents, constant motorboat traffic, and numerous boats on crowded moorings. For about 250 miles along the coast of California between Ventura Harbor and Moss Landing there is no other enclosed bay for small craft use. Access to the undeveloped shoreline of the sandspit by small boat is a recreational delight.

Further explanation: Port San Luis and Santa Barbara Harbor are protected from ocean swells coming from the north and west, but they are open to seas arriving from the south. To find a large bay for small boat paddling and sailing one must drive south to the LA area or north to the small harbors at Moss Landing and Santa Cruz. Nooks and crannies of San Francisco Bay offer protected water for small boating. The Los Osos' back bay is a very special place to paddle or sail small boats.

Planning Staff comments – The second option is acceptable – "Notably....

2.2.1, p. 2-3, pdf p. 30 "Continued expansion of the community's trail system and bay-oriented recreation (e.g. kayaking, canoeing, sailing, etc.) could further promote establishment of Los Osos as a tourist destination.

Suggested revision: "Continued expansion of the community's trail system and improvement of informal small boat trailer-launching facilities to facilitate for bay-oriented recreation (e.g. kayaking, canoeing, sailing, etc.) could further promote establishment the reputation of Los Osos as a tourist destination."

Comment: Boating in non-motorized small craft on the wide-open peaceful back bay near Los Osos/Baywood Park is far superior to paddling and sailing near the City of Morro Bay where strong currents, heavy motorboat traffic, and crowds of moored boats degrade the experience. The lack of an improved trailer-launching site in Baywood Park inhibits this activity to a degree. Of course, it must be noted that boating on the back bay is not possible during daily times of low tides.

Planning Staff comments – *This change is not necessary.*

2.2.3, p. **2-4**, pdf p. **31** "Los Osos is located along the south shore of Morro Bay. The Morro Bay estuary is a nationally significant resource that supports wildlife and recreational opportunities."

Suggested revision: "Los Osos is located along the south shore of Morro Bay, the only embayment for over 100 miles in either direction along a rugged coastline exposed to the open sea. The Morro Bay estuary is a nationally significant resource that supports wildlife and as well as commercial and recreational opportunities."

Comment: There is no harm in spelling out why Morro Bay is crucial to maritime activity (both commercial and recreational) and why it is important enough to be included as one of NOAA's National Estuary Programs. Although Los Osos isn't directly involved in commercial shipping, Morro Bay's importance to commercial marine activities (including shipping, offshore fishing, and oyster farming) cannot be ignored in discussion. [More comment on the bay's value to the offshore commercial fishery is found below.]

Planning Staff comments – This change is not necessary.

2.2.3, p. 2-4, pdf p. 31 "Los Osos wishes to reduce its dependence on the automobile in addition to planning for climate change resilience along the bayshore. To achieve reduction in automobile dependence, the community envisions the development of an integrated circulation system that accommodates safe use not only by motorists, but also by pedestrians and bicyclists."

Suggested revision: "... To achieve reduction in automobile dependence, the community envisions the development of an integrated circulation system that accommodates safe use not only by motorists, but also by pedestrians and bicyclists. Increasing pedestrian and bicycle circulation is made challenging by Los Osos' tradition of narrow streets with no sidewalks serving as cross-town collectors, the general lack of sidewalks except for a few parts of the Los Osos and Baywood central business districts, and the soft sandy road shoulders."

Comment: Unfortunately there's been little money to pay for the infrastructure needed to increase multi-modal circulation, nor is there ever likely to be.

Planning Staff comments – This change is acceptable.

2.2.4, p. 2-5, pdf p. 32 "...the complete streets movement instead promotes efficient design for all users, including bicyclists and pedestrians. To achieve this, the community supports reduced paving widths for new roads. Reducing widths helps to calm and slow vehicular traffic, while allowing sufficient right-of-way to accommodate bicycle and pedestrian facilities.

Suggested revision: "...the community supports reduced driving lane widths for new roads. Reducing widths helps to calm and slow vehicular traffic, while allowing sufficient paved right-of-way to accommodate designated lanes for bicycles and pedestrians (pedestrian lanes could be hard-surfaced instead) facilities.

Comment: Are pedestrians and bicycles expected to use the unpaved shoulders of these "reduced paving widths" (in other words, narrow) roads as their "facilities"? See my comment above that mentions "soft sandy road shoulders".

Planning Staff comments – This change is acceptable.

2.2.4, p. 2-5, pdf p. 32 "The community also desires more "active" recreational facilities such as sports facilities for larger groups of people. Los Osos is rich with "passive recreation" opportunities, such as hiking and birdwatching. Trails are available throughout the community in preserved open space areas. Additionally, nearby state parks also support passive recreation. There is little active parkland, however, available in the community. The community desires a larger community center, additional sports fields, and an aquatic center. Funding and financing these facilities will likely require additional sources of revenue, such as a benefit assessment district."

Suggested revision: "... Los Osos is rich with "passive recreation" opportunities, such as hiking, and birdwatching, shore fishing, sand castle building and beach play, and boating. Trails are available throughout the community in preserved open space areas. Informal unimproved shoreline trails, located in Tract 40 and Cuesta-by-the-Sea. Informal sites for trailer-launching small boats are located at the Tract 40/Baywood CBD interface (south end of 1st Street) and at Cuesta-by-the-Sea, should be improved. Additionally, nearby state parks..."

Comment: Boating in non-motorized small craft on the calm, wide-open bay at Los Osos/Baywood Park is far superior to paddling and sailing near the City of Morro Bay where hazards of strong currents, heavy motorboat traffic, and a crowded boat anchorage degrade the experience. The lack of an improved trailer-launching site in Baywood Park inhibits this activity to a degree. (Boating on the back bay is possible except during some hours each day at times of low tides.)

Planning Staff comments – This change is not necessary.

2.2.5, p. 2-5, pdf p. 32 "Providing complete streets with bike lanes and pedestrian paths helps to encourage an active lifestyle. Similarly, ensuring adequate recreational facilities also supports healthy community activities like youth sports. By ensuring opportunities for physical activity as part of the built environment, we can ensure that future residents of Los Osos will have better public health outcomes.

Suggested revision: "Providing complete streets with paved bike lanes and hard surfaced pedestrian paths helps to encourage an active lifestyle. Similarly, ensuring adequate recreational facilities also supports healthy community activities like youth sports. By ensuring opportunities for physical activity as part of the built environment, we can ensure that future residents of Los Osos will have better public health outcomes."

Comment: As I said in a previous comment, narrowing the pavement to 'slow traffic' accomplishes nothing for pedestrians if they need to make do with the soft sand road shoulder while cars and trucks—the drivers looking at their phones—go by, a few feet away. New "complete streets" do nothing in most of the town when there is no funding to improve existing streets to include bicycle lanes and hard surfaces for pedestrians.

Planning Staff comments – This change is acceptable.

lu-9.1, p. 2-29, pdf p. 56 "C. Additional parks and recreational projects. As funding becomes available (e.g. through a benefit assessment), the LOCSD and/or County Parks should pursue the development of desired parks and recreational facilities. The community has identified the following desired improvements:

- A boat launch and park in the Back Bay or Cuesta Inlet areas "
- [Sorry. Auto-formatting has run-amuck.]

• Suggested revision: • "An improvement of informal sites for launching small boats from trailers launch at 1st Street in Baywood Park-and near Lupine Street at Cuesta Inlet areas-with associated parks in the Back Bay or

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• Comment: Passive recreation is mentioned many, many times in Chapter 2 Community Plan Policies. The informal trail along the Tract 40 shoreline exists today, with accessss points at the south end of 1st and 2nd Streets, at the north end of 3rd Street, and at Pasadena Coastal Access near the western end of Santa Ysabel Avenue. The shoreline area is commonly used for walking and hand-launching paddleboards and kayaks. All that would be required to improve this *de facto* park is the widening of roadway shoulders for parking, and the addition of more better-tended trash receptacles and signage. Improved roadway width for walking and bicycling is also needed nearby. Unleashed dogs frighten shorebirds and signage might help a little. The informal launch ramp at Cuesta Inlet is muddy and is located at the eastern end of a long narrow channel. The prevailing wind opposes progress to reach the bay. This site is useful to strong paddlers to launch their boats, but it is a very inconvenient place for use by inexperienced or weak paddlers and for launching sailboats.

Planning Staff comments – This change is not necessary and too specific.

CIR-1.4B, Table2-3 p. 2.47, pdf p. 74 "Access Improvements: Bay Street, 7th Street, and Pecho Road."

Suggested revision: "Coastal Access Improvements, including beaches, access points, and viewpoints: Bay Street, 7th Street, and Pecho Road, beaches, and other sites." Also, please add non-profits to Other Participants for this item.

Comment: I'm not aware of a "Bay Street." The viewing platform described as being at "Bay Street" (location described in next paragraph) has been in place for several years. (It's been there long enough for rotted posts to cause the sign to fall over a couple of years ago. I was the one who notified County Parks. The sign was repaired.)

Comment continues: 6.4.1, p. 6-4, pdf p. 132 says this "In Tract 40 on the Baywood Peninsula at the end of Santa Ysabel Avenue, a small parking area and trail to the bay has been developed. To the north is Bay Street, which includes a bay overlook." I'm not aware of a "Bay Street" in Los Osos/Baywood Park. (Perhaps it is a leftover from early maps of Tract 40.) The overlook that is described as being north of the Pasadena Coastal Access is located between homes at 1119 and 1131 Pasadena Drive. There is also a small platform with a bench next to the street at 600 Santa Lucia Avenue. I don't know if it is an official viewpoint.

Planning Staff comments - This change is acceptable.

EN-1.4, Table2-3 p. 2.48, pdf p. 75 "Protection and management of sensitive habitats."

Suggested revision: "Protection and management of sensitive habitats and viewpoints." Add PW to list of Other Participants.

Planning Staff comments – Okay with the change to add PW to list of Other Participants. However staff is not supportive of the change to this program:

The County should work closely with public agencies and conservation organizations to protect and manage sensitive habitat resources.

The addition of: and viewpoints is not appropriate.

Table 2-?, p. 2-51, pdf p. 78 "Key to Agencies referenced in table 2-4"

Error correction: "Key to Agencies referenced in table 2-4 2-3"

Planning Staff comments – This change is acceptable.

3.7, p. 3-12, pdf p. 91 "The community's shoreline is a special place where many passive recreation areas are located, such as Sweet Springs Nature Preserve, the Elfin Forest, Audubon 3rd street Lookout, and street-end easements. Local residents and tourists enjoy the shoreline."

Suggested revision: "The community's shoreline is a special place where many passive recreation areas are located, including viewing platforms at Sweet Springs Nature Preserve, the Elfin Forest, and at the Audubon Overlook on 3rds 4th Street. , and No vertical access to the bay is available at these viewpoints. Access to the waterfront area skirting the Baywood Peninsula (Tract 40) is afforded by the street-end easements at the south end of 1st and 2nd Streets, at Pasadena Coastal Access at the west end of Santa Ysabel Avenue, and at the north end of 3rd. Waterfront access is afforded along the shoreline at Cuesta Inlet. Local Los Osos residents and tourists enjoy the shoreline. The Elfin Forest Natural Preserve includes trails, a boardwalk loop with ADA connection to 16th Street, and two platforms with views of the bay, but there is no shoreline access.

Comment: Known as the "Audubon Overlook," this viewpoint platform is located on the edge of the bay where 4th Street intersects with Santa Lucia Avenue. The shoreline around the Baywood Peninsula may be the town's most used park if one counts all the varied uses it is put to all day, every day. [Also noted in next item and elsewhere.]

Planning Staff comments – This change is acceptable.

3.7.1, p. 3-12, pdf p. 91

"Los Osos has one community park, the 6.2-acre Los Osos Community Park. In addition, Los Osos residents have convenient access to Montana de Oro State Park, and other "special" recreation facilities, including Sweet Springs Nature Preserve, Elfin Forest Natural Area, Morro Bay State Park and Golf Course, and Los Osos Oaks State Reserve. Public schools augment the community's recreational facilities. The California Education

Code allows community use of public school facilities and grounds, including supervised recreation activities. Although the County has no joint-use agreements with the school district, school sites are extensively used by local neighborhoods for recreational purposes. "

Suggested revision: "Los Osos has one community park, the 6.2-acre Los Osos Community Park. In addition, Los Osos residents have convenient access to Montana de Oro State Park, and other "special" recreation facilities, including Sweet Springs Nature Preserve, Elfin Forest Natural Area, Morro Bay State Park and Golf Course, and Los Osos Oaks State Reserve. The waterfront area that skirts the Baywood Peninsula (Tract 40), between 2nd Street on the South and 3rd Street on the north, is a *de facto* community park. Public schools augment the community's recreational facilities. The California Education Code allows community use of public school facilities and grounds, including supervised recreation activities. Although the County has no joint-use agreements with the school district, school sites are extensively used by local neighborhoods for recreational purposes.

Planning Staff comments – This change is not necessary.

Figure 3-7 Open space, recreation and tourism, p. 3-13, pdf p. 92

suggested revision: "Elfin Forest Natural Area (County Park / Morro Bay State Park)"

Comment: Full name and the ownership/management is not designated for the Elfin Forest.

Planning Staff comments – This change is not necessary.

4.2.1, p. 4-2, pdf p. 95

Paragraph 1: The Morro Bay watershed is essential...

Paragraph 2: The Morro Bay Estuary supports the most significant wetland system on the south central coast. The estuary, together with its watershed, supports a variety of valuable natural and human resources and activities: ...[and six bulleted points]"

Suggested revisions to the bulleted points:

- Crop production on fertile bottom lands and grazing on hillsides*, and aquaculture
- An established commercial fishing industry
- Spawning grounds and nursery waters for fish and other marine life
- Habitat for shorebirds, waterfowl, raptors, migrating birds, and more than 24 threatened or endangered plants and animals
- Tourism and recreation, such as fishing, boating with power or sail, kayaking, golfing*, and tourist attractions, sandy beach activity
- Electric power generation transmission*
- Refuge and services for vessels traversing over 200 miles of open coast between harbors at Santa Barbara and Monterey

*Comment: Besides proximity, how is the Morro Bay estuary related to grazing, golfing and electric power generation? (The power plant has been decommissioned and permanently closed for many years.) You could change the paragraph's opening sentence to say "...Estuary area...", but the area—the watershed—is described in the previous paragraph on p. 95. It would

make sense to move the items on grazing on hillsides, golfing (also on hillsides), and electric power transmission to that previous paragraph. (If offshore wind-farm energy generation ever comes to fruition, it will connect to the power plant's power distribution yard through the cooling water outfall that opens directly into the Estero Bay, outside of Morro Bay.)

Comment: Why is Morro Bay Estuary the "most significant?" Because it is the <u>only</u> estuary of any size for over 200 miles of rugged coastline, from the Carpinteria Salt Marsh south of Santa Barbara to Elkhorn Slough at Moss Landing at Monterey Bay. Morro Bay estuary's function as spawning ground and nursery area for commercially valuable fish as well as other marine organisms is crucial to the productivity of a very large ocean region along the coast of central California. (Morro Bay is the only navigable harbor with protection from south-swells for an even wider distance—from Ventura Harbor to Moss Landing.)

Planning Staff comments – We can update the language. However, this language is directly from the adopted Estero Area Plan.

4.7.6-A-3-d, p. **4-8**, pdf p. **101** "Baywood Peninsula (SRA). This area is a narrow fringe of dune sands with planted Monterey cypress and pine trees rising above the bay and providing an exceptional close-hand view of the bay."

Suggested revision: "Baywood Peninsula (SRA). This area is a exceptionally scenic -narrow fringe of dune sands ,with planted Monterey cypress and pine trees rising above the bay and or mud, submerged at highest tides, is a prime feeding and resting area for shorebirds, although they are often driven away when unleashed dogs are brought here. California Seablight, an endangered plant, grows on the slopes at the highest tidal range. The shore is inhabited on its sandy west-facing side by burrowing marine invertebrates. The finer sediments of the muddy shore of south-facing and north-facing shorelines support a salt water marsh plant community. A gritting area for migratory Black Brant geese exists at the south. Nearby, large planted Monterey cypress and pine trees provide night roosts for herons and daytime vantage points for raptors.

Comment: Off the top of my head as a marine scientist: the Baywood Peninsula is a shorebird feeding area, the gritting area for Black Brant geese, a habitat for mud and sand dwelling invertebrates, with estuarine plant community on the north and south facing shores where there is mud rather than sand along shoreline, endangered Seablite all along the peninsula shoreline. Trees and view don't describe the shoreline but do provide roosts for birds. (Sweet Springs and Elfin Forest also have views but views are not mentioned their descriptions.)

Planning Staff comments – This change is not necessary, but acceptable.

Lisa Denker emailed me recently, sending this:

Hi Dave,

Here's plant information for the Baywood Park Peninsula Bayshore Plants.

<u>Baywood Park Peninsula Bayshore Plants</u>Estuarine plants: **Fleshy jaumea** (*Jaumea carnosa*), **Pickleweed** (*Salicornia sp.*), **Alkali heath** (*Frankenia salina*), **California sea lavender** (*Limonium californicum*, **Salt grass** (*Distichlis spicata*), and **California seablite** (*Suaeda californica*). These plants grow on the shoreline from brackish low-med tide to high tide mark depending on each plants specific zone.

According to the Morro Bay National Estuary Program, "California seablite (Suaeda californica) has been federally listed as endangered due to loss of estuarine habitat; in fact, Morro Bay supports the very last remaining natural population. A group of wetland ecologists from San Francisco State University have established and are monitoring a restored population in San Francisco marshland."

There are also California coastal sage and chaparral and Maritime chaparral growing on the slopes of the peninsula, like Silver lupine, Black sage (*Salvia melifera*), California sagebrush (*Artemisia californica*). Maybe it should just highlight the above list.

Birds

The peninsula has resident Great Blue Herons that roost in the old growth Monterey Cypress and hunt for fish on south facing shore. Other birds that are seen daily on south facing shore are Great Egret hunt fish in the shallows of the bays edge waters, and lizards and mice on the adjacent properties. Snowy Egrets are seen, Black-crowned Night-Heron(though less of them with the decline of mature trees on the peninsula). America Coots have been a regular part of the shoreline at the end of 1st Street eating algae and gritting, but have also declined in numbers due to the increase human foot traffic and dogs. Grebes and Loons can be seen hunting for small fish right on the waters edge. A variety of Ducks come over from Sweet Springs to warm on the south shore and feed and grit. Curlews, Dowitcher, Godwits, American Avocet, and many other Pipers also warm, feed and perfect their flight patterns on the south shore of the peninsula. Other birds include Kingfishers, Turkey Vultures, a wide range of Hawks, Osprey and Peregrine Falcons. Fall in Baywood Park is pronounced by the arrival and sound of the Terns (not sure which type of Tern) that congregate at north/west of the Peninsula on the oyster beds floats.

Should Mudflats be mentioned?

Wetlands filter water, the Pickleweed sequesters carbon and filters debris working it into the mud, and a variety of wildlife eggs are incubated in the Pickleweed.

https://www.mbnep.org/2018/10/26/native-plant-series-6-estuarine-and-salt-marsh/

 $\frac{https://www.fisheries.noaa.gov/infographic/infographic-value-coastal-wetland-habitat}{Thanks,}$

Chapter 5 Circulation Element

Comment: The chapter opens with a photo of Santa Ysabel Avenue, one of only a few streets with a bikeway. I wish there were more streets like that in the town.

p. 5-2, pdf p. 111

"The California Complete Streets Act (2011) requires that jurisdictions address the needs of all users
of public roadways when updating General Plan documents. Users of public roadways include
motorists, pedestrians, bicyclists,
children, persons with disabilities, seniors,

movers of commercial goods, and users of public transportation. Planning a "complete street" means taking the safety, convenience, and comfort of all of these users into account. Features of a "complete street" could include: "

suggested revision:

1. "The California Complete Streets Act (2011) requires that jurisdictions address the needs of all users of public roadways when updating General Plan documents. Users of public roadways include motorists, pedestrians, mothers pushing baby buggies, bicyclists, children, persons with disabilities, seniors, movers of commercial goods, and users of public

transportation. Planning a "complete street" means taking the safety, convenience, and comfort of all of these users into account. Features of a "complete street" could include: "

Comment: Many young families live in Los Osos. The soft sand shoulder of a road is not a "safe, comfortable, or convenient" place to push a baby buggy!

Planning Staff comments – This change is not necessary, but acceptable.

Table 5-2, p. 5-3, pdf p. 112

I wish you could add these items: (Often discussed at LOCAC's Traffic and Circulation committee for at least the past five years):

- --Narrow street with soft shoulders unsafe for pedestrians on 9th Street between Santa Ynez Avenue and Ramona Avenue.
- --Narrow street with soft shoulders unsafe for pedestrians on Ramona Avenue between 9th Street and 4th Street.
- --Narrow street with soft shoulders unsafe for pedestrians on Los Osos Valley road between Pine Avenue and Doris Avenue.

Planning Staff comments – This change is acceptable – under circulation deficiencies identified by the community.

1. **5.1.2**, p. **5-4**, pdf p. **113** "A north-south connection west of the central business district between Los Osos Valley Road and the El Moro and Baywood commercial areas.

Question: Is this needed because the people in Redfield Woods need better access to Baywood Park and vice versa, or is it because the 9th-to-Ramona-to-7th-to-El Moro route is inadequate? The former is unlikely. If the latter, all an additional connection (Ravenna extension) will accomplish is to serve many drivers seeking to avoid the winding route between the Los Osos CBD and Baywood.

Planning Staff comments – Any direct route that provides access for residents is certainly better than winding or circuitous routes to get to the same area.

These north-south connections served as the only routes of access between Baywood Park and Los Osos Valley Road, until the construction of South Bay Boulevard. Once So Bay Blvd was built, the north-south connections became less critical. Now, they carry far less traffic than they used to. But local traffic still relies heavily on this roadway network. Any additional roads constructed to provide more direct routes of access relieves pressure on other overburdened roads.

For residents living in the 1400 and 1500 blocks of 4th Street (a residential street and likely path of least resistance for through travel—even with the chicane), the prospect of a Ravenna extension leading to more through-traffic on 4th is ominous. If housing is developed in the Morro Shores area in the future build-out, I suggest including local roads that wind through the development to carry those residents in and out; but I oppose the inclusion of a major connecting route that passes straight through between LOVR to Ramona. A winding local road design for Morro Shores would widen the distribution of traffic between Los Osos CBD and Baywood, thus lessening some pressure on 9th and Ramona.

Planning Staff comments - As it stands in 2018, 4th Street north of Ramona carried just over 1700 cars per day, and north of Pismo (the location of the chicane) saw just over 700 cars per day. 3rd Street saw just over 1100 cars per day – the math does not align exactly, but the numbers correlate sufficiently. 3rd Street carries far more traffic than 4th Street. And development on Morro Shores would likely contribute to increases on 3rd Street – the drivers using 4th Street are likely local and know where they are going, and are not likely using 4th Street to go to the CBD in Baywood – it simply takes them out of the way.

Staff recommends retaining the Ravenna Street connection in the Plan. We have flexibility with the current language:

Extend Ravenna Avenue between Los Osos Valley Road and Ramona Avenue as development occurs, if needed and warranted for the circulation system (as determined by Public Works).

If we were to make the change as Dave Bowlus suggests, that additional traffic will occur – but it will be pushed to Broderson or Pine and/or 9th Street; creating a more circuitous route and will not relieve pressure on 9th Street – it is likely to add to the pressure, as well as add pressure onto other parallel roads. Staff does not want to limit our options for this connection.

At T&C meetings I have suggested devising a system that designates one-way travel on parts of 7th, 9th, Nipomo, and Ramona as a way to spread out motor vehicle traffic on the 9th to 7th route and provide space on the pavement for pedestrian and bike lanes. The only expenses would be for signage and painted lines on the street.

Planning Staff comments — Public Works staff has heard the request to create a one-way street system. And while this is something that could be considered, this idea is not ready to establish into policy. Two persons have brought it up at LOCAC's Traffic and Circulation meetings — but we have not heard from the broader community and have not looked into whether or not it would work/be feasible.

5.2.1 C, p. 5-5, pdf p. 114

Residents in Los Osos have shown interest in a comprehensive approach to slow-down traffic in residential and commercial neighborhoods. Slower traffic can make neighborhoods safer, quieter, more conducive to walking and bicycling, and more livable, with a greater sense of community. A variety of "traffic calming" measures can be used to slow traffic, including reducing widths of existing streets and designing narrower streets in new land divisions. Some measures involve landscaping, which can also make neighborhoods more attractive. Specific traffic calming measures may be considered for approval by the County Public Works Department.

suggested revision: Residents in Los Osos have shown interest in a comprehensive approach to slow-down traffic in residential and commercial neighborhoods. Slower traffic can make neighborhoods safer, quieter, more conducive to walking and bicycling, and more livable, with a greater sense of community. A variety of "traffic calming" measures can be used to slow traffic, including reducing driving lane widths of existing streets and designing narrower driving lanes on streets in new land divisions. Hard surface lanes are needed for pedestrian and bicycle use due to the town's soft sandy ground. Some measures involve landscaping, which can also make neighborhoods more attractive. Specific traffic calming measures may be considered for approval by the County Public Works Department.

Comment: Narrower streets alone will not solve the problems of pedestrians and bicycles. Hard surface lanes are needed for pedestrian and bicycle use due to the soft sandy ground in Los Osos.

Planning Staff comments – *This change is acceptable.*

Table 5-3, p. 5-6, pdf p. 115 Los Osos Valley Road within the CBD.

Add: Complete the sidewalks! (Is that what "Streetscape improvements" means?

Planning Staff comments – Sidewalks are included in streetscape improvements, but we can be more specific if desired.

Table 5-3, p. 5-6, pdf p. 115 Collector Roads Ravenna Avenue:

Comment: If housing is developed in the Morro Shores area, I suggest local roads there to carry those residents in and out, but no major connector through-route from LOVR to Ramona.

(There's more.)

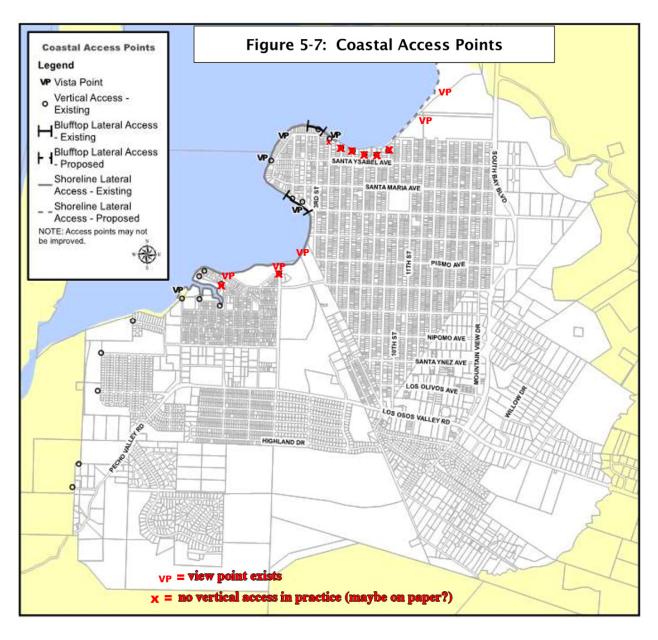
p. 5-17, pdf p. 126 Figure 5-7 Coastal Access Points:

Viewpoints in Elfin forest and at Sweet Springs not shown

Viewpoint but no bay access in Cuesta by the Sea at the north end of Doris.

Other viewpoints lack vertical access

Vertical access points at 4-9th streets and elsewhere may only exist on paper.



(For better visibility, a pdf of this image is also attached to the email.)

Planning Staff comments – Okay with this change regarding the View Points. The x's are street ends or designated areas that may be developed in the future.

LOCP Chapter 6 Coastal Access

General Comment on Tract 40 bayside access: Regarding coastal access to the shoreline and the bay: On the bayside perimeter of Tract 40 on the Baywood Peninsula, between the south end of 2nd Street and the north end of 3rd Street, there exists an informal path along the shoreline and access to the protected waters of the bay. This area, which was almost unmentioned as a recreational resource in the December 2019 version of the LOCP EIR and mentioned a little more in this LOCP draft, is possibly the most used recreational site in the entire town if one counts its almost constant use for strolling, dog walking, picnicking, beach play, sunset viewing, nature viewing, shore fishing, and the hand-launching of stand-up paddleboards, kayaks, and canoes. Small sailboats can also be launched here with varying degrees of difficulty. Tidal rhythms affect use since it is slightly submerged during the highest tides that occur for a few hours on a few days each month.

General Comment on Special Quality of Boating in Los Osos' Back Bay [repeated from Chapter 2]: Boating in non-motorized small craft on the wide-open peaceful back bay near Los Osos/Baywood Park is far superior to paddling and sailing near the City of Morro Bay, where hazards of strong currents, heavy motorboat traffic, and crowds of moored boats degrade the experience. The lack of an improved trailer-launching site in Baywood Park inhibits this activity to a degree. (Boating on the back bay is possible except during times of low tides.)

Planning Staff comments – Comment noted.

6.4, p. 6-3, pdf p. 130 "The community of Los Osos offers a wide variety of public access opportunities, including two nature preserves, a state park, and formal and informal accessways to the Morro Bay estuary..."

Comment: Is the Elfin Forest one of the nature preserves mentioned? Two platforms serve as coastal viewpoints at the EF and two platforms are at SS. But there is no access to set foot on the shoreline of the estuary at Sweet Springs or at the Elfin Forest.

Planning Staff comments - Comment noted.

6.4, p. 6-3, pdf p. 130 "...Several improved facilities exist, including overlooks and trails along the shoreline of the Bay. Most accessways are lateral easements. There are also potential vertical accessways, vista points and a trail connecting Sweet Springs to Baywood along the shoreline of the Bay. Currently, the primary use of the shoreline of the Bay is by local residents, as residential neighborhoods border the shoreline."

Suggested revision: "...Several improved bay overlook facilities exist, including overlooks and but only informal trails exist along the shoreline of the Bay. A hard surface pathway on one shoulder of 4th Street, Pismo Avenue, and 3rd Street connects Sweet Springs to Baywood. and a trail connecting Sweet Springs to Baywood along the shoreline of the Bay. Most accessways are lateral easements. There are also potential vertical accessways and, vista points. Currently, the primary use of the The shoreline of the Bay is used by local residents, as residential neighborhoods border the shoreline. In addition, people from other parts of town and from out of town make extensive use of the shoreline and many launch boats there on holidays and weekends. Numerous parked vehicles crowd nearby streets at those times. Large numbers of people from all over town use of the shoreline near the Baywood Pier on weekdays during free weekly concerts and during the weekly Farmers' Markets held in the Baywood CBD.

Comment: The completed eastern addition to Morro Coast Audubon Society's Sweet Springs Nature Preserve includes a viewing platform, designed to function as a bird blind to minimize human disturbance of waterfowl at the edge of the bay. It would be anothem for people to walk along the shoreline near the bird viewing area of Sweet Springs. If that isn't enough to discard the idea of a shoreline path to Baywood, I know from personal experience that the shoreline along this eastern bight of the bay consists of soft mud. It would be necessary to construct a boardwalk mounted on pilings in order to have a shoreline pathway.

Planning Staff comments – This trail is in the Parks and Recreation Element. More discussion is warranted before removing this trail.

6.4.1 p. 6-4, pdf p. 131 "The Elfin Forest ... boardwalk loop trail and overlooks are accessible from 16th Street, and connecting trails extend to adjacent street ends."

Suggested addition: "The Elfin Forest ... boardwalk loop trail and overlooks are accessible from 16th Street, and connecting trails extend to adjacent street ends. There is no shoreline access at the Elfin Forest."

Planning Staff comments – This change is acceptable.

6.4.1 p. 6-4, pdf p. 131 West of the Elfin Forest, there is an opportunity to develop the northern end of 7th Street for public access and an overlook that offers vast vistas of the Morro Bay estuary and the sandspit. The end of 4th Street is developed with an overlook. The other street ends between 5th and 9th Streets should be managed to protect, conserve and preserve habitat.

Suggested revision: West of the Elfin Forest, there is an opportunity to develop the northern end of 7th Street for public access and an overlook that offers vast a wide vistas of including the Morro Bay estuary, and

the sandspit, and the volcanic landforms to the north. The north end of 4th Street is developed with an overlook. The other street ends between 5th and 9th Streets should be managed to protect, conserve and preserve habitat.

Comment: The shoreline between 5th and 9th is overgrown with willows and other vegetation. That shoreline offers no bay access except at a few crude docks on private property.

Planning Staff comments – This change is not necessary, but acceptable.

6.4.1, p. 6-4, pdf p. 131 "In the Baywood Commercial area, the southern end of 2nd Street is developed with a small pier with a seating area. In the vicinity are benches overlooking the bay and the tidal flats. Lateral access is available along the shoreline of the Bay. Opportunities for boat launching are limited due to sensitive habitat."

Suggested revision: "In the Baywood Commercial area, the southern end of 2nd Street is developed with a small pier with a seating area. In the vicinity are benches overlooking the bay and the tidal flats. Lateral access is available along the shoreline of the Bay. A sandy beach is immediate to the pier. Opportunities for boat launching are limited due to sensitive habitat Small watercraft may be launched by hand or with a hand-operated buggy down the ramp on the Pier and at the beach nearby, access limited by the availability of nearby parking. Trailer-launching of small boats near the pier is precluded by the design of the parking lot. Hand launching and small boat trailer-launching is available on an informal ramp at the south end of 1st Street. There is an opportunity to develop an improved ramp at 1st street. Boating is strictly governed by the tides. The shallow back bay deters nearly all use by motorized boats. For paddle boats and small sailboats the back bay offers unique coastal recreational amenities: wide calm water that is free from hazards such as strong currents, motorboat traffic, and crowded boat moorings.

Comment: Trailer launching at the so-called launch ramp at the Baywood Pier requires backing the trailer across 2nd Street traffic, then backing around a bend, then driving over a curb and over an unreinforced boardwalk, before driving across soft sand to reach the water. As for other waterfront activity including boat launching, the site is clearly posted "Public Coastal Access". SENSITIVE HABITAT HAS NOTHING TO DO WITH IT. WHERE THE HECK DID THIS IDEA COME FROM?!

Planning Staff comments — This is an area with sensitive habitat. Due to environmental concerns County Parks decided not to pursue a boat launch at 1st Street. A portion of this change can be made —

"In the Baywood Commercial area, the southern end of 2nd Street is developed with a small pier with a seating area. In the vicinity are benches overlooking the bay and the tidal flats. Lateral access is available along the shoreline of the Bay. A sandy beach is immediate to the pier. Opportunities for boat launching are limited due to sensitive habitat Small watercraft may be launched by hand or with a hand-operated buggy down the ramp on the Pier and at the beach nearby, access limited by the availability of nearby parking. Trailer-launching of small boats near the pier is precluded by the design of the parking lot. Hand launching and small boat trailer-launching is available on an informal ramp at the south end of 1st Street. There is an opportunity to develop an improved ramp at 1st street. Boating is strictly governed by the tides. The shallow back bay deters nearly all use by motorized boats. For paddle boats and small sailboats the back bay offers unique coastal recreational

amenities: wide calm water that is free from hazards such as strong currents, motorboat traffic, and crowded boat moorings.

6.4.1, p. 6-4, pdf p. 132 "In Tract 40 on the Baywood Peninsula at the end of Santa Ysabel Avenue, a small parking area and trail to the bay has been developed. To the north is Bay Street, which includes a bay overlook."

Suggested revision: 6.4.1, p. 6-4, pdf p. 132 says this "In Tract 40 on the Baywood Peninsula at the end of Santa Ysabel Avenue, a small parking area and trail to the bay has been developed. About a block to To-the north on Pasadena Drive is Bay Street, which includes a bay overlook platform. The south end of 1st Street, at the interface of the Baywood commercial district and Tract 40 residential area, is an undeveloped site with grand views of bay and sunsets, a picnic table, and an informal site for hand-launching and trailer-launching small boats with nearby parking (except during Baywood CBD events). There is an opportunity to develop an improved launch ramp at 1st street. Boating is strictly governed by the tides. The shallow back bay deters nearly all use by motorized boats.

Comment: I'm not aware of a "Bay Street" in Los Osos/Baywood Park. The overlook that is described as being north of the Pasadena Coastal Access is located on a lot between homes at 1119 and 1131 Pasadena Drive. There is also a small platform with a bench next to the street at 600 Santa Lucia Avenue.

Planning Staff comments – This is an area with sensitive habitat. Due to environmental concerns County Parks decided not to pursue a boat launch at 1st Street. A portion of this change can be made –

In Tract 40 on the Baywood Peninsula at the end of Santa Ysabel Avenue, a small parking area and trail to the bay has been developed. About a block to To-the north on Pasadena Drive is Bay Street, which includes a bay overlook platform. The south end of 1st Street, at the interface of the Baywood commercial district and Tract 40 residential area, is an undeveloped site with grand views of bay and sunsets, a picnic table, and an informal site for hand-launching and trailer-launching small boats with nearby parking (except during Baywood CBD events). There is an opportunity to develop an improved launch ramp at 1st street. Boating is strictly governed by the tides. The shallow back bay deters nearly all use by motorized boats.

Table 6-2, p. 6-10, pdf p. 137 "038-692-015"

Error. Please correct to "038-732-015"

Planning Staff comments – This correction was made in the staff report – Attachment 5.

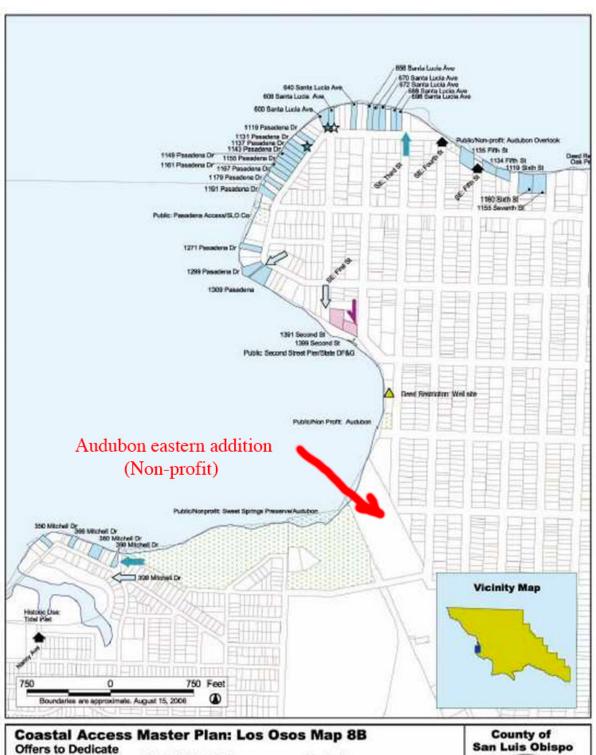
pdf p. 140 Coastal Access Master Plan: Los Osos map 8 B

Correction to map on next page:

Sweet Springs eastern extension not indicted as public/nonprofit

(For better visibility, a pdf of the image is also attached to the email.)

Planning Staff comments – This change is acceptable.





General Services Parks Division Dear Ms. Brown,

I appreciate your patience with our community and the many years of work you have put into the Los Osos Community Plan. Also, I'm in awe of the complexities that you take in stride as a County Planner. With the LOCP being such an important document, I have read it again, and in the course of doing so, I saw a few things that may need either updating or correcting. Since there seem to be multiple versions of the document, I cited sections and page numbers to direct you to places in the "original" document (I think) and a later one although you probably have all of the versions memorized by now.

I hope there is still time to make changes before the October meeting with the Planning Commission. Thank you for your forbearance once again.

Sincerely,

Beverly Boyd

Public Review Draft, January 30, 2015

Chapter 3: Land Use Descriptions and Settings

Figure 3-5: Existing Public Facilities in Los Osos (page 3-10)

3rd Street identifies 5th Street rather than 3rd. The label needs to be moved two streets to the west.

Chapter 5: Circulation Element

5.2 Circulation Improvements (page 5-4)

Second paragraph, second sentence: "One map shows existing and proposed roads that are classified by their function as principal arterial, arterial, and collector roads." From my reading it seems that roads throughout the CP are classified as "arterial, collector, and local roads." (See page 5-5.) Should this sentence be changed?

Planning Staff comments — This correction was made in the staff report — Attachment 5.

Table 5-3: Needed Circulation Improvements (page 5-6)

What determines what is "needed" when identifying these changes? Is what is listed here written in stone? I submit that the extension of Ravenna Avenue as a Collector Road

is not "needed" by surrounding neighborhoods and will, in fact, be detrimental to them. Adjacent Local Roads are inadequately prepared to bear the brunt of significantly increased traffic of hundreds of vehicles, resulting from an estimated 414 dwellings for an estimated population increase of 994 persons "at Buildout." [See Table 3-1: Land Use Summary, p. 3-2.]

Ravenna's extension as a Collector Road contradicts a central goal of the Community Plan, which is to increase multi-modal forms of transportation. There are better options for the Morro Shores parcel that should be considered.

When the Traffic and Circulation Subcommittee* reviewed circulation priorities (with Mike Britton in attendance), one key option was to create a pedestrian path / bicycle route through the Morro Shores parcel instead of making Ravenna a Collector Road through there. Doing so would ensure a safe route for children as well as adults to and from schools, the library, and the community center while creating no pollution.

If and when development must occur in that area, why not encourage multi-modal transportation while providing a more desirable neighborhood on site as well? New housing could include cul-de-sacs and provide two or three different entrances onto existing Collector Roads. In that way pressure on surrounding neighborhoods would be lessened as they would share the burden of more traffic. The new housing, too, would be subject to less traffic, noise, and pollution.

Is there a way to review alternatives rather than have a Ravenna Extension designated as a Collector Road and listed as a "**needed** improvement"? In other words, can it be taken off that list on Table 5-3? It seems there are better solutions.

[If Ravenna were removed from the "Improvement" list, the description of Ravenna as a Collector would need to be eliminated from the Circulation Appendix as well. (F.2. Proposed Improvements, B.2., page F-12).]

(* I have been a regular attendee of the Traffic and Circulation Subcommittee meetings since June 2015.)

Planning Staff comments -

Staff recommends retaining the Ravenna Street connection in the Plan. We have flexibility with the current language:

Extend Ravenna Avenue between Los Osos Valley Road and Ramona Avenue as development occurs, if needed and warranted for the circulation system (as determined by Public Works).

Figure 5-7: Coastal Access Points (page 5-15)

This map is inaccurate and incomplete. Missing are at least two vertical access spots: the south end of 1st Street and the southwest corner of the peninsula between 1299 and 1309 Pasadena Drive. Other streets are marked as vertical access when they are merely vista points.

Chapter 6: Coastal Access

6.4.1 Baywood Park (page 6-4)

1st Street, a vertical access street, is not mentioned in this section. Please insert a new paragraph before or following Paragraph 3 that identifies First Street as offering coastal access. My suggestion:

"The southern end of 1st Street offers vertical access to the Bay where one may find a picnic table, enjoy splendid sunsets, or slide a small, unmotorized boat, such as a kayak or a sailboat, into the bay"

Planning Staff comments — This correction was made in the staff report — Attachment 5.

Figure 6-1: Potential Alignment of the California Coastal Trail (page 6-7)

On this map 3rd Street seems to label 4th Street (or 5th). The designation needs to be moved to the west where 3rd Street is highlighted in yellow.

Planning Staff comments – *This change is acceptable.*

Figure 6-2: Improvement of Coastal Access (page 6-12)

This map (page 6-8) is incomplete, possibly inaccurate, and conflicts with other data.

- a. 3rd Street already has a gravel path at the convergence of Santa Lucia and 3rd Street that leads down to the water (i.e., vertical access). If someone wants a more elaborate path, then it might remain as designated.
- b. Figure 6-2 does not indicate the designated vertical access between 1309 and 1299 Pasadena Drive, which is shown on Figure 6-4, Map 8B (page 6-13). It is also described in "6.4.1. Baywood Park" (page 6-4) in the fourth paragraph. Currently, access is blocked with foliage. Consequently, it should be marked on Figure 6-2 as well, indicating an access point that needs improvement.

Planning Staff comments – Staff recommends retaining the 3rd Street access improvements and adding the 1309/1299 access point.

Table 6-2: Coastal Access Inventory (pages 6-9 & 10)

- a. Incomplete parcel number for 1309 Pasadena Drive: Shouldn't it be 038-732-008 (page 6-10)? Also, shouldn't it be labeled as "Vertical" Access? Please see the map on the LOCP's page 6-13 (Coastal Access Master Plan: Los Osos Map 8B). Also, it's shown as such on Tract 40, Book 038, p. 73, on the SLO County's Assessor's map. The same designation of "Vertical" should probably be added for parcel #038-732-007 at 1299 Pasadena Drive (page 6-9).
- b. Incorrect parcel number for "Street End: First St. South end:" Designated as "Vertical," that parcel number should be 038-732-015 rather than 038-692-015 (page 6-10).

Please double-check my suggestions for these numbers.

* *

Planning Staff comments – This correction was made in the staff report – Attachment 5.

Public Hearing Draft, June 8, 2020

The following comments respond to a version of the LOCP that has corrections in blue.

Figure 5-4: Circulation Plan (page 5-14)

If there's an alternative to extending Ravenna so as not to make it a Collector Road through Morro Shores, Ravenna needs to be removed from this figure and the list as a "Collector."

Planning Staff comments – See previous comment on Ravenna.

6.4 Overview of Existing and Potential Coastal Access

Here I see statements I think may be incorrect or unfeasible in the future. In the first paragraph, third sentence, the last part of the sentence (page 6-3) is questionable: "There are also potential vertical accessways, vista points and a trail connecting Sweet Springs to Baywood along the shoreline of the Bay."

Explanation: Depending on what is meant by "shoreline," that would be a lovely path, but along 3rd Street the shoreline consists mostly of mud and thick brush in which many animals make their homes. Currently, the closest connection to the shoreline for pedestrians is to take El Moro to 3rd Street to Pismo to 4th Street to

Ramona to Sweet Springs. As it is, it's already a lovely walk. Developing a path on the shoreline might be problematic in that doing so would involve the destruction of habitat. A biologist would need to be consulted. By the way, Audubon built a bird blind on the waterfront of the eastern addition of Sweet Springs, and a bayfront path would eliminate the use of that blind.

See also: Chapter 7-60, #2. Baywood Park Area West of 3rd Street.

a. Limitation on of (sic) Use - West of 3rd Street. "For the bayfront area between Pismo and El Morro (Moro?) Avenues, allowable uses are limited to one single family dwelling per legal parcel, residential accessory structures, home occupations, animal raising and keeping, coastal accessways, and passive recreation (hiking and nature trails and nature study.)"

Question: Does this describe East, rather than West, of 3rd Street? Is the area west of 3rd along the bay developable, especially with sea level rise? Also, isn't it part of the estuary?

Planning Staff comments — The trail is in the Parks and Recreation Element, if the trail is no longer desired by the community it will need to be removed from the Parks and Recreation Element.

Kerry Brown

From: Marie Smith <mailmarie@charter.net>
Sent: Monday, October 5, 2020 10:28 PM

To: Kerry Brown

Subject: [EXT]Fwd: Los Osos Community Plan - A comment

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

Dear Kerry,

I do not know if my comments in the attached 2016 email ever made it into the public comments for the LO Community Plan or if the report has already been changed to reflect my concerns. I saw my other email comments posted but not this one, attached below.

Please continue to scroll down in that email to notice that <u>the area in question is in a protected area: the Morro Bay State Marine Reserve!</u>

Since the 2016 email, I have personally observed the Brant and other birds resting and eating in the area <u>from the 3rd street end heading east and north.</u>

The 3rd street end heading west and south to the Pasadena access has become like a dog park!

Please look into this important concern for nature (and us!), Thank you, Marie

Begin forwarded message:

From: Marie Smith <mailmarie@charter.net>
Subject: Los Osos Community Plan - A comment
Date: December 12, 2016 at 12:45:59 PM PST
To: Kerry Brown <kbrown@co.slo.ca.us>

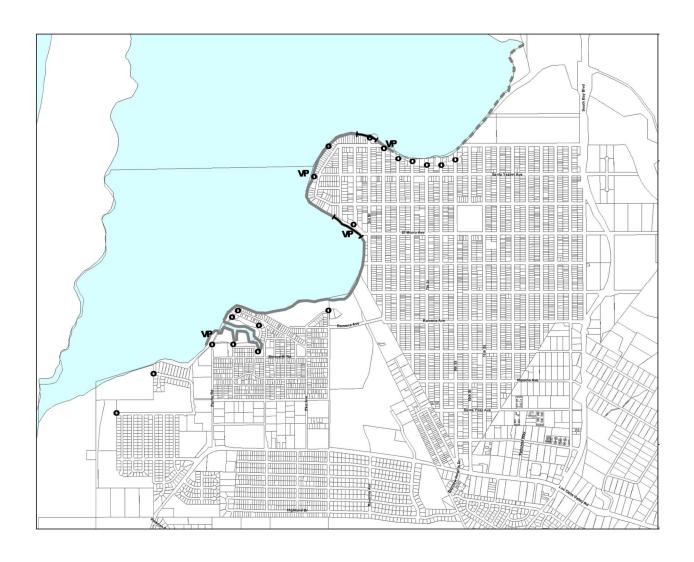
Hello Kerry,

In response to the Community Plan, posted on the LOCAC website:

When considering the addition of shoreline Lateral Access, like in Figure 5-7 *, we need to be careful. Areas where the birds and wildlife are undisturbed by people, dogs, boats are necessary for the survival of nature. There already is easy beach walking from the south end of 1st Street to the north end of 3rd street. The natural vistas and birds can also be seen from the street ends. Creating another official lateral shoreline access as proposed below may interfere with the many birds and animals seeking food and refuge there. One of the present wonders of the Elfin Forest is the ability to see the natural, undisturbed vista from its' overlooks. Please reconsider this proposed shoreline in the Community Plan - it may be undesirable!

Thank you, Marie Smith Los Osos

^{*} Figure 5-7 Proposed Shoreline Lateral Access as indicated by the dash line in the following:





This is from the Morro Bay State Park Pamphlet.

Notice that the area in question is along the shore of the Morro Bay State Marine Reserve, where "Hundreds of species of birds reside or migrate to these rich and diverse MPAs" (Marine Protected Areas).



San Luis Obispo County August 7, 2020

Attn: Planning Commissioners

RE: Los Osos Community Plan Agenda Item #4 LOCP - continued

I addressed the Commissioners via ZOOM during the Public Comment period in the July 9th meeting. However, due to the limited time allowed and the numerous concerns I was trying to express, I was not able to convey my thoughts within the allotted time. My objective was to offer enough specific existing problems with the Circulation and Public Funding sections of the LOCP and to recommend that the Planning Commission direct the Planning team to revisit the Circulation and Public Funding sections along with their supporting Appendices to ensure they were accurate and met the necessary regulatory requirements. My time expired and I did not get a chance to make this request.

One of the items I noted pertaining to the Figure and text conflicted in the Bikeways description, and the Bikeways and Trails paragraph's figures do not match where each references the other. In the July meeting Commissioner Multari directed Planning to ensure these were consistent. I do not see that this has been addressed in the material being presented in this session.

My three areas of concern:

- 1. The Circulation and Public funding sections, Appendices F & G and even the master index, listing items included the Appendices has significant editorial mistakes and missing content in Appendices referenced for supporting detail. The document is a legal document and needs to be accurate to recommend it to the county Board of Supervisors for "approval".
- 2. The Circulation element forecasted impact is based solely on the TDM model. The model has a material error having not included the full Collector route from 4th/Pismo/3rd to Baywood CBD in the model(Pismo link missing). This route is presently impacted today and will be the shortest, most direct route from the Morro Shores new development area and Baywood CBD and El Moro in general. As such, the accuracy and impact to both vehicles and noise throughout this El Moro Area is in question. Reviews of Circulation Study updates back to 2007, which was used for the 2009 EAP, suggest this error has likely existed since then and therefore likely missed identifying Capital Improvement Fund qualifying impacted locations that should currently be factored into fee calculations. Further, all Local designated roads are dismissed from review. Many of these Local roads are precisely what the community has been voicing concerns about; especially having limited sidewalks. Many of these are interconnected into the road network and are impacted by through-traffic and Public Works has no process to identify and address problems.
- It does not appear analysis of the Circulation element meets the standards of new required Government Codes and 2008 Complete Streets Act to provide a stronger link to multi-modal alternate travels. This is especially apparent having disregarded all Local roads in the assessment.
 - Several nearby community Circulation/General Plan updates demonstrate those jurisdictions have taken a more pragmatic and disciplined approach to assessing and improving multi-modal alternatives. I believe the strengthened Government Codes along with the 2008 Complete Streets Act stipulate this requirement(effective Jan 2011) require all jurisdictions to do this. The

draft LOCP follows a basic outline similar to the EAP and is even worse having material editorial errors.

The LOCP document is not yet ready for Board of Supervisor's consideration. There is a reasonable risk the set of issues identified above will be flagged at one of the subsequent reviews and cause a recycle to correct the deficiencies. A better approach is to get it right the first time.

Attached below is an embedded attachment with specifics for those wishing to read the actual document sections for a more detailed understanding.

Sincerely,

Robert Kreps Los Osos resident

Attachment

Most of the comments provided herein were provided in submissions during the formal Public Comment period to both the EIR and the base LOCP. Only the EIR only has a requirement to formally respond to public comment. Paraphrasing the Consultant's response----it is out of their purview to review the TDM model since it has been previously vetted and is only needed for higher level planning. Also, there was no apparent follow-up within Planning regarding the written comments provided to the LOCP to investigate the concerns. Apparently Public Works was not directly involved in the preparation of the Circulation element of the document. It is not clear if the EIR consultant or some other party complied the LOCP Circulation element or who/how it was proofed for accuracy.

The Public Funding section was not available in the public comment draft & and the document's Master Index was revised with errors. This was brought to Planning's attention and has not been corrected in this LOCP version recommended "for approval".

Issues:

- The LOCP has material editing errors: Master Reference Index; Section 5 Circulation;
 Section 8 Public Funding.
 - a. Master Index references items in Appendix F & G that do not exist.
 - b. Circulation Roads Leaving various identified new road improvements timing associated with the Morro Shores area development up to the discretion of Public Works is not appropriate. Various upgrades are identified at full development, but as described more fully below, El Morro area traffic is impacted today. Any incremental development will further contribute impact on these Collector and Local road segments

- without any improvement. My focus has been primarily on the El Moro area circulation impact. Could there be other areas of the community having impacts within the General Plan similarly missed if they were looked at in more detail?
- c. Circulation Bikeways -- Written commentary describing the future plans are inaccurate and does not match the displayed figure.
- d. Circulation The SLOCOG El Morro sidewalk project is not identified by name nor any commentary around the longer-term strategy this is trying to accomplish. Nor are any details about the South Bay Bridge project.
- e. Circulation The section references tables in Appendix F that do not exist.
- f. Circulation Brief commentary regarding the Complete Streets Act ties to the wrong date. 2011 vs. 2008. Minor typo, but inaccurate editing on an important aspect.
- g. Public Funding The section refers to summarizes information referring to supporting detail in Appendix G that does not exist.
- h. Public Funding The chart is supposed to capture all County capital costs. However, drainage improvements capital costs to roads need to be quantified and included if they are considered a priority before new development can proceed. Please note the editor makes reference to drainage problems as being "seasonal and cosmetic" essentially not important. This is troubling as these situations of sand in streets or flooding has a big impact to street circulation.
- i. General theme Narrowing roads for speed-calming. No distinction is made regarding using this technique for new roads, along with appropriate bike & pedestrian accommodations, or whether the strategy applies to all roads, including existing roads, that must accommodate bikes and pedestrians that must also use the same road pavement. Further, there needs to be a description of the area's current emergency evacuation routes addressing how this will not be compromised under a narrowing street policy to encourage speed-calming. The Montecito flood, Paradise fire disasters, and other potential causes for rapid emergency evacuation raise this aspect for higher consideration in road design counter to a narrowing street strategy. If street narrowing is to be promoted, a description regarding how it will not compromise evacuation plans needs to be provided.
- j. General theme Page 2-35 and the goal EN-2 of the LOCP states that Public Works has to have implemented necessary drainage projects affecting the estuary prior to any new development. This provision should be strengthened regarding the use of words "should" and "shall" prepositions now intermix. These drainage improvements need to be made a priority both for estuary protection and correcting some of today's circulation deficiencies even without dependence on new development. The estuary is being impacted today by lack of proper drainage. It needs to be stated perfectly clear that no new development will proceed until these deficiencies are addressed.

2. Circulation study analysis and the TDM model

a. Assumptions to set "existing" conditions are in error and therefore cannot be relied upon for future buildout impacts. A review of the latest 2018 and prior Circulation

- Studies suggest this error may have existed for the 2009 EAP General Plan, which relied on a 2007 Circulation Study.
- Using data collected spanning from 2003 to 2016 at various locations for model input to represent "current-state" system flow likely contributes to erroneous results.
- c. Specific Collector path Ramona/4th/Pismo/3th (to Baywood CBD) results do not show this having any impact. Public Works is aware of current traffic impacts along this route and has taken some temporary measures for speed calming while environmental restrictions limit their alternatives. Given that it is impacted today, any future traffic load increase will require more substantive engineering at 4th/Pismo and maybe Pismo/3rd intersections. Not identifying this section and intersections, along with other locations that have been identified needing upgrades, will underfund Road Improvement Fund calculations. Similarly, I believe this has been modelled incorrectly all along.
- d. The Circulation study only looks at Arterial and Collector roads. Los Osos is basically a bedroom community with many Local roads. The need for speed-calming and improved pedestrian safety has been a common theme provided by the community given the pedestrian need to share roads. This is consistent with community desires identified in the 2009 EAP. However, Public Works has no formal program and policy to assess impact to Local roads. Both within the TDM circulation modeling and in Public Works commentary define Local roads are intended only for Local traffic. Therefore, Local roads are not included in any assessment. Public Works makes only this statement: their policy is to "discourage through-traffic on Local roads"; however, in practice they have no funds or process materially affect this on existing impacted roads. In fact, they really do not have any systematic review of potentially impacted areas, only feedback from the public.
- e. The EIR provides a summary of the 2009 EAP indicating a Ravenna road extension to Ramona upon the development of the Morro Shores area with a route diversion out of the existing right-of-way. This language is not in the original EAP. Conversations with Public Works in 2019 confirmed the line item in the Capital Improvement Project table includes a future extension within the existing ROW. The approved Bikeway Plan associated with this same extension is consistent with this. This is an important point because this assumes a direct connection intersecting at Ramona/4th intersection that will further influence traffic onto the 4th/Pismo/3rd Collector and Local streets to Baywood CBD without planned improvements. This proposed change was never discussed with the community or LOCAC for any subsequent revision to one of the Circulation Studies. But it is clearly not part of the existing approved EAP as described.
- f. The EIR Noise assessment relies on the TDM ADT data. Similarly, with incorrect input data, this may not be highlighting impact areas correctly. For example, 9th Street displays as being fully connected with higher noise level from LOVR to Santa Ysabel. There is a street traffic barrier near Pismo cross street separating 9th Street

to effectively have two cul-de-sacs along the route negating the assumed traffic flow. The generated higher noise results indicate this Noise model or the TDM model are incorrect. Similarly, for the lack of having reported information within the TDM model on the 4^{th} /Pismo/ 3^{rd} Collector route to/from the Baywood CBD, no existing nor future noise was simulated along this route. One would expect to see an increase similar to 7^{th} Street or El Morro.

- g. The new traffic distribution assumptions to/from the Morro Shores new development area are not provided. This leaves it up to the Modeler's discretion to set the model to forecast how the various new connections would distribute traffic. It is common in modelling applications to perform a variable sensitivity assessment to understand if further evaluation is warranted. This is not provided.
- 3. The Circulation element of the LOCP has not been examined to the standards now required by the 2008 California Complete Streets Act.
 - a. I am not well versed in the full details of implementation of the Act. However, by inspection of the Circulation sections for other localities that have been prepared after 2011, it is apparent they each prepared a more comprehensive evaluation and multi-modal plan. There is a more concerted effort of the requirement to ensure progress is achieved to promote alternative transportation.
 - b. The Act requires, whenever a responsible jurisdiction updates a General Plan's Land-Use after January 2011, that a more substantive examination of Circulation include achievable **plans**, not just ideas or policies, to enhance multi-modal transportation in new development, redevelopment of existing areas, as well <u>as existing areas</u> within the General Plan's geographical boundary.
 - c. It appears many communities have sidewalks along Local roads so these are of less concern. Residential areas with through-traffic do get attention.
 - d. The Circulation section does not appropriately address the requirements of the Act.
 - i. Trails program has not been changed since 2006.... except for the potential new multi-use trail along LOVR from Palisades to the Monarch School. And it is not even clear that this has been formally accepted by Parks & Rec.
 - ii. The Bikeways Plan eliminated all new future bikeways within the neighborhoods that were in the plan at the time the EAP was approved. No new bikeways are proposed/planned within existing neighborhoods despite this being one of the key findings of community needs.
 - e. I stated in the July 9th Zoom meeting that the Circulation section Bikeways Figure and corresponding text conflict and the Bikeways and Trails figures do not match where each references the other. Commissioner Multari directed Planning to ensure these were consistent. I do not see that this has been addressed.
 - f. Public Works has data to confirm that El Moro area Local streets carry substantial through-traffic.

August 8, 2020

Attn: Planning Commissioners

RE: Los Osos Community Plan Agenda Item #4 LOCP - continued

These comments are supplemental to my previous letter dated August 7th. There are three Los Osos referenced SLOCOG circulation projects identified in Appendix F. It would be useful to have the Circulation element include some details and descriptions of these projects and prospective timing as they have an impact on this element.

• South Bay Bridge - The South Bay bridge is in need of a future upgrade. Some commentary about this project would be useful.

Will this upgrade be a nearby replacement or use solely the existing foot-print? Will it be provisioned for future 4 lane traffic or sized similar to today? There will also be a need for a protected bike/pedestrian walkway. This might be a separate bridge feature. The California Coastal Trail LOCP commentary refers to the bridge as the point of access to Los Osos.

A precise definition for the Urban Reserve Line, specifically to the north in the area where the South Bay Bridge is located should be clear. I understand it is "at" the bridge. Any contemplated area of land that may potentially be affected by the new bridge(s) construction need to be clearly identified as being within or outside the URL. It is ambiguous relying only on the URL outline figure. Without clarity, the County could potentially be under two different Environmental review/approval processes in conjunction with the project making it much more complex; one approved for the LOCP URL and another that applies to county areas outside the URL.

- Turri Road Based on the LOCP URL boundary figure, it appears that Turri road outside the URL area. However, the Turri road slipout project is identified as a Los Osos SLOCOG project and listed in Appendix F.
- El Moro Pedestrian This project is a one block "sidewalk" construction project near Baywood Elementary. Some commentary regarding the associated strategy associated with this would be useful.

F-9 c. Circulation Appendix – Refers to Nipomo Creek Bridge in title. Another typo?

Sincerely,

Robert Kreps Los Osos resident

Item 4

San Luis Obispo County
Attn: Planning Commissioners

October 4, 2020

RE: Los Osos Community Plan
Input to October 08, 2020 meeting

Thank you for giving attention to the comments I previously submitted. I recognize the review process needs to move forward. I hope these comments provide a useful approach that will ensure the concerns of the community regarding safety for all mode users on all roads are met.

California has placed a much greater focus on alternate modes of transportation and reducing GHG with the signing of both the Complete Streets Act and Senate Bill 743. Senate bill 743 lead to the elimination of the Level of Service (LOS) metric for CEQA used in the LOCP Circulation Study. The new metric is Vehicle Miles Travelled (VMT). A two-year transition period was granted for projects, as may be needed. The bill also provides for a supplemental Local Mobility Analysis (LMA) when jurisdictions deem appropriate. Many jurisdictions have already transitioned to this system.

Los Osos neighborhoods must accommodate motor vehicles, bikes and pedestrians on common road pavement. Bikes and pedestrians are considered vulnerable road users. Los Osos' road network is predominately made up of Local residential roads, yet the Circulation study (focused solely on impacts to motorists) dismissed Local roads from review, stating the assumption that Local roads serve only local area residents. Another assumption is that all roads meet current County standards. Neither of these assumptions is accurate. Los Osos is an appropriate candidate to benefit from an LMA analysis as well as an active transportation assessment to understand impact of the proposed growth plan.

The LOCP Circulation section lacks any evaluation from the vulnerable user perspective of the impact increased vehicles will have on safety of multi-user shared road segments. Neither Parks & Rec nor the Bikeways Committee has the responsibility to evaluate the impact an increase in vehicles would have regarding bikes or pedestrians in a General Plan review. In addition, Park & Rec's Trails perspective appears geared towards pedestrian recreation and leisure-oriented activities separate from roads. It is not clear who is responsible for evaluating common road use and pedestrian safety in established neighborhoods. The community expressed neighborhood road safety concerns in the 2015 Planning-led workshops and in comments to the LOCP and EIR drafts. This remains a significant analysis gap today.

SLO County is committed to achieve longer term goals of encouraging increased use of alternate transportation and to reduce vehicle use (and GHG emissions). Los Osos residents need to have safe routes for using alternate transportation, thereby lessening their dependence on motor vehicle use. The State has also elevated the priority of ensuring vulnerable roads users' safety. County Planning recognized the need to ensure that there are sustainable water resources by including specific measures to be completed before allowing new growth. Similarly, future growth should be conditioned on completion of a new transportation system analysis using the California's current VMT and LMA standards and the completion of an active transportation assessment for Los Osos.

Sincerely,

Robert Kreps Los Osos resident October 5, 2020

To: Planning Commission

Re: Los Osos LCP Update

Commissioners:

I have previously written to you regarding my concerns with the LCP update. Please refer to my previous letter, as those concerns still exist. The purpose of this letter is to hi-lite a couple of significant points regarding the unfair and inappropriate designations of ESHA within the USL—specifically for those areas within developed sections of the community.

It is important that each of you recognize the significant adverse impacts that come into play by virtue of ESHA designations where in fact there is no ESHA. The citations below are from the most recent staff report and point out that under an ESHA designation there are no new land divisions allowed. This is significant in restricting the ability to provide much needed housing. It is just plain wrong. These in-fill areas should at least have the opportunity to make a case for development, rather than being precluded by a blanket designation.

"Traditional development is allowed in ESHA only to the extent necessary to avoid an unconstitutional taking. For example, if an entire residential parcel were designated as ESHA, it could be developed with a single family residence of the minimum size and site disturbance to avoid a taking and subject to mitigation measures to minimize impacts on the identified ESHA. Subdivisions are prohibited on sites containing ESHA."

I urge you to please carefully consider the long-term impacts of your commissions decision to designate any areas within the USL as ESHA. The staff originally did not designate these areas as such, instead relying on an entirely appropriate programmatic approach on a project basis. Below is the citation from the staff report.

"Since the LOCP anticipates buildout within the Los Osos USL and since the LOHCP establishes a programmatic approach for mitigating impacts to sensitive habitat areas within the USL, staff did not originally designate any areas within the Los Osos USL as ESHA."

There is absolutely no justifiable reason for designating the areas within the USL as mapped ESHA and severely restricting development opportunity on any of these properties. I urge you to direct staff to amend this section of the update prior to sending to the Board of Supervisors.

Respectfully submitted,

Rick Kirk

805-459-4101



FURTHER DISCUSSION REGARDING THE DRAFT LOS OSOS COMMUNITY PLAN (LOCP) & ENVIRONMENTALLY SENSITIVE HABITAT AREAS (ESHA)

County File No. LRP2011-00016 & LRP2020-00006 08 October 2020

Dear Planning Commissioners,

As you know, we represent the heirs of the Clayton E. & Claire M. Fluitt Irrevocable Trust, owners of property located within the study area of the Los Osos Community Plan and, specifically, APNs 038-711-020, -021, 038-720-008, -023. The properties are zoned residential suburban and residential single-family, respectively, and are located adjacent to and east and west of South Bay Boulevard. After commenting on the LOCP's Environmental Impact Report and providing written responses and testimony to the Commission, we appreciate the opportunity, once again, to provide these comments regarding the implications of an ESHA designation on our client's and other properties.

1. The LOCP ESHA Map's Inconsistency with the EAP

The draft LOCP ESHA map is inconsistent with the certified Estero Area Plan. The Estero Area Plan (EAP) states that "[a]ll other county plans, policies and programs that involve the Estero Planning Area"—including Los Osos—"are to be consistent with and implement this plan." (See EAP at 1-1.) Further, "all public and private development in this planning area is to be consistent with [the Estero Area Plan]."

The Estero Area Plan, most recently updated and certified by the California Coastal Commission in 2009, includes an official Combining Designations ESHA Map^[1] for the Estero Planning Area, which includes Los Osos. (See EAP at 1-10 (incorporating said Map into EAP)). The LOCP includes proposed amendments to the EAP to reference the new LOCP. The EAP was certified and adopted just a little over a decade ago. Nevertheless, a new ESHA map is being proposed as part of the LOCP process that is **inconsistent** with the certified Combining Designations ESHA Map. The provenance and analytical basis for the proposed ESHA map have remained unclear throughout the public review process, and the proposed ESHA map is inconsistent with the EAP and the EAP's plain mandate that "all other county plans, policies and programs that involve the Estero Planning Area" be "consistent with and implement" the EAP. (See EAP at 1-1.). The Planning Commission is urged to dispense with a new, contradictory, and confusing ESHA map that undermines the EAP.

[1] County law defines what constitutes "Mapped ESHA." Mapped ESHA must be "mapped as Land Use Element combining designations." (Coastal Zone Land Use Ordinance § 23.11.030, at 11-16). In other words, mapped ESHA must be depicted on a map. And not just any map. It must be an "official map" adopted as part of the Land Use Element. (CZLUO § 23.07.160 ("The Sensitive Resource Area combining designation is applied by the Official Maps (Part III) of the Land Use Element to identify areas with special environmental qualities, or areas containing unique or endangered vegetation or habitat resources.").

3427 Miguelito Court

Nor does the County **need** to adopt a new ESHA map as part of the LOCP process. As described above, an official ESHA map for Los Osos and the greater Estero Planning Area already exists. That map has been certified by the Coastal Commission, meaning the Commission deems it consistent with the Coastal Act. The only reason for updating the EAP's official Combining Designations ESHA Map would be if the map incorrectly designates property as ESHA when the property in fact has no ESHA. On the other hand, if the ESHA Map does **not** designate ESHA where ESHA in fact exists, there is a ready solution in the County's Coastal Zone Land Use Ordinance (CZLUO): the "unmapped ESHA" process. Under that process, the County can assess whether property being proposed for development contains ESHA at the time of permit application. (See CZLUO § 23.11.030, at 11-17 (defining "Unmapped ESHA")). The County has nothing to gain but confusion and potential disputes with property owners from adopting a different ESHA map for an area that already has one.

2. Lack of Support for an ESHA Designation

Any ESHA designation that is <u>arbitrary</u>, <u>capricious</u>, <u>or lacking in evidentiary support</u> would be susceptible to legal challenge.

Staff states that one factor justifying <u>exclusion</u> of a parcel from an ESHA designation is where the parcel is "surrounded by development." The parcels we represent are surrounded by development on all sides – an arterial road to the north and east, and residential and commercial development to the south and west. It would be arbitrary and capricious to single out these parcels for an ESHA designation under the staff's own standards; standards which are consistent with the Coastal Zone Land Use Ordinance's (CZLUO) definition of "ESHA."

3. CA Fish & Wildlife Service (CAFWS) and the Listing of the Morro Shoulderband Snail

County staff has stated that the LOCP ESHA Map is based on the analysis completed for the Los Osos Habitat Conservation Plan (LOHCP). The LOHCP, in turn, is based largely on the protection of an endangered species—the MSS. However, in July, the CAFWS issued a proposed rule to down-list the MSS to "threatened." As part of that rule, the CAFWS sought information "on activities or areas that might warrant being exempted from" the "take" prohibitions of the ESA (a "Rule 4(d)" exemption). In other words, in the near future, certain activities (e.g., residential development) in certain areas (Los Osos / our parcels) that are habitat to the MSS may be exempt from the "take" prohibition. In light of this recent turn of events, it would be premature to designate the parcels as ESHA.

4. Mapped vs. Unmapped ESHA

Coastal Commission staff has long pressured the County to map the entire Los Osos area as ESHA. But, under the Coastal Act, it is the *County* – not the Commission staff –

^[2] We have previously provided references to show the LOCP mapping is not consistent with the LOHCP mapping, so the analytical relationship between the documents is convoluted.

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OASIS ASSOCIATES, INC. 08 October 2020 PC Item No. 4 Los Osos Community Plan & ESHA Page 3 of 3

who decides how to write its LCP. County staff is urged to protect its jurisdiction in this respect. In addition, Commission staff ignores the important process contained in the County's CZLUO: the unmapped ESHA process. Under that process, property that is not mapped ESHA may nevertheless be found to contain ESHA after a careful, site-specific analysis at the time of a permit application. By their nature, unmapped ESHA analyses are more rigorous and scientific than the "mapped ESHA" process, which—given its enormous geographic scope—often involves "windshield" surveys.

5. The Request

In closing, we appreciate your consideration of the aforementioned information and respectfully request that the Commission consider the <u>removal of the Los Osos Community Plan ESHA map and maintaining the mapped ESHA currently identified in the Estero Area Plan's official Combining Designations Map.[3]</u>

Respectfully yours, OASIS ASSOCIATES, INC.

C.M. Florence, AICP Agent

Clayton E. & Claire M. Fluitt Irrevocable Trust

Attachments - Los Osos Urban Reserve Area Combining Designation Map

c: Fluitt & Schmid Family Members 19-0072

^[3] This would also maintain the ESHA designations in the Countywide and Los Osos Urban Reserve Area Combining Designations maps which would contain the same and consistent information throughout but are scaled for legibility and readability.

