E9 E00149

LAND USE ELEMENT LOCAL COASTAL PLAN

SAN LUIS OBISPO COUNTY GENERAL PLAN



FINAL ENVIRONMENTAL IMPACT REPORT

ESTERO AREA PLAN

SAN LUIS OBISPO COUNTY DEPARTMENT OF PLANNING & BUILDING

December 2003

Errata – Estero Area Plan EIR – June 15, 2004

At the time of this writing, the planning commission is nearing the end of their review of the Estero Area Plan and EIR. A number of changes have been tentatively approved that may require some clarifications in the text of the FEIR. In addition, a number of errors and other necessary clarifications have been identified beyond those identified in the May 3, 2004 errata sheet. This erratum represents a comprehensive review of the EIR to date in light of proposed plan alterations and public testimony received.

Changes to EIRs prior to certification are always viewed in terms of their potential to require recirculation of the EIR. Specific guidelines for recirculation are found in Section 15088.5 of the CEQA Guidelines.

(a) A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. As used in this section, the term "information" can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement. "Significant new information" requiring recirculation include, for example, a disclosure showing that:

(1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
(2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
(3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it.
(4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

(b) Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.

Pursuant to the subsection (e) of this guideline, decisions not to recirculate an EIR must be supported by substantial evidence in the record.

The following errata have been compiled pursuant to the guidance in the above section.

Plan Changes Affecting the EIR in a Number of Areas

(1) On May 27, 2004 the PC voted to increase the density on the Pollard property from 10 units to the acre to 26 units to the acre. This had the effect of increasing the dwelling unit potential from 109 units to 283 units, an increase of 174 units. The following analysis reflects the impact of this change on the EIR and its conclusions:

Project Description – The change would have the effect of changing the buildout in Cayucos under the plan from a potential dwelling unit increase of 135 to 309, and a potential population increase from 1,653 to 2,017.

Traffic – Assumptions for traffic increases in the Cayucos area totaled 1% per year, based on guidance provided by County Engineering staff. Staff have been contacted to determine whether the proposed change would impact their assumptions (Dave Flynn, pers. comm.); staff concluded that the proposed increase would not warrant changing the projected rate of increase. All roadways in the Cayucos area currently operate at LOS A, and are projected to do so through buildout of the area plan. The change therefore has no substantial impact on conclusions or mitigation regarding traffic in the EIR.

Air Quality – The conclusions in the air quality section are based on assessment of the plan's consistency with the most recent Clean Air Plan (CAP). In part, this assessment looks at the plan's population projection versus the CAP. The population projection is based on a mandated growth rate for Cayucos; the proposed alteration for the Pollard property would not change the growth rate. The change therefore has no substantial impact on conclusions or mitigation regarding CAP consistency.

Noise – The conclusions in the noise section are predicated on traffic growth; since the change will not impact projections for traffic as stated above, the noise environment will not be substantially affected.

Water Resources – Buildout in the Cayucos area was specifically set to maintain balance between water supplies and demand. The proposed change will increase demand in the Cayucos area by 39 AF/Y. The Pollard Trust has agreed to participate in the Nacimiento project for 50 AF/Y, therefore it appears their anticipated water supply will be sufficient. The reader should note the proposed density increase is conditioned on the availability of Nacimiento water.

Cumulatively, the proposed change would increase demand by 39 AF/Y, exacerbating shortages in the short term and potentially resulting in shortages under conservative scenarios in the long term. The long-term impact is mitigated by the condition that requires sufficient supplemental water prior to approval.

Wastewater – The proposed change will increase wastewater generation by 0.003 mgpd, bringing the total generated to 0.4939 mgpd for the community at buildout. This total is still well within the 0.944 mgpd in capacity Cayucos is entitled to. The

proposed change would therefore have a less than significant impact on wastewater treatment capacity.

Drainage and Water Quality – The proposed change would be subject to all of the proposed policies and standards regarding drainage. The proposed change would increase density, but would not otherwise change the assumptions or conclusions of this section.

Public Services – The proposed change may increase the project enrollment at Cayucos schools, further exacerbating projected shortages in classroom space. Mitigation through the assessment of fees would not change. The Plan contains policies and programs to support efforts for a new elementary school. The proposed change would not modify the conclusions or policies contained in the plan. Impacts to other services would not be substantial: the increased population may speed up the need for a new fire facility, and may require additional officers. Additional impacts are not considered substantial.

Biological Resources – The proposed change will not affect conclusions or analysis regarding biological resources. The site is currently shown for dense residential use, and continues to do so under the proposed change.

Agricultural Resources – The proposed change will not affect conclusions or analysis regarding agricultural resources. The site is currently shown for dense residential use, and continues to do so under the proposed change.

Aesthetics – The proposed change will increase density on a parcel adjacent to Highway 1. The project does not change height limitations, design standards or the nature of future development on site. The EIR finds significant cumulative impacts to views from roadways and beaches under the plan, due to increases in density and attendant lighting impacts. The proposed change will not change the conclusions or recommendations of the EIR. Development within the Highway 1 corridor is required to comply with scenic highway standards.

Geologic Conditions – Impacts associated with geology are inherent in the soil structure of the area. Increased density on this particular parcel will not impact conclusions or mitigation in the EIR.

Cultural Resources – The proposed increase in density would not impact conclusions or mitigation regarding cultural resources.

(2) Changes in Los Osos Dune Sands ESHA Mapping and Site Disturbance Standards. The Planning Commission has tentatively approved the removal of the following properties from the mapped Dune Sands ESHA:

- Properties West of the curve of South Bay Boulevard

- Proposed tentative Tract 2251 (Anastasi property, otherwise known as The Farm)
- Seahorse Lane properties
- Goedinghaus (already subdivided and graded)

The Planning Commission voted to retain the Dune Sands ESHA mapping.

The Planning Commission tentatively made the following changes to Dune Sands ESHA Standards:

- Exempted vegetation or fuel modification areas from site disturbance total
- Exempted from more restrictive standards projects disturbing less than 500 square feet
- Exempted restoration or native plant maintenance from site disturbance total
- Provided for an adjustment procedure for site disturbance through a MUP if certain findings can be made (including that the adjustment is necessary to allow reasonable use of site)
- Exempted like-kind and like-footprint replacement of destroyed structures
- Deleted standards pertaining to the South Bay Boulevard area

ESHA and related impacts of development in ESHA are addressed in Section 5.8, Biological Resources beginning on page 5.8-27, and continuing through to page 5.8-32. The analysis of biological impacts and consistency with the Coastal Act is general in nature. Modification of the specific parcels subject to the Dune Sands ESHA standards in particular do not therefore necessarily affect the discussion, conclusions or mitigation recommended in the EIR. Parcels throughout Los Osos will be subject to site-specific analysis of ESHA presence or absence or participation in an HCP pursuant to the standards in Chapter 7 whether they are mapped or unmapped. Nowhere does the plan exempt property owners from complying with endangered species act requirements.

The modifications in site disturbance limitations may increase incrementally the potential for impact to ESHA; however, existing measures requiring mitigation of impacts through one or more mechanisms may still apply; mitigation on or off-site would still take into account the total area of disturbance. Feasibility of mitigation would be part of the environmental review process.

The conclusion of the FEIR is that impacts are significant and unavoidable given the sensitive nature of the area. The proposed alterations would not change this conclusion or the mitigation proposed.

(3) Removal of TDC mapping – The Planning Commission tentatively approved removal of maps showing TDC sending and receiving sites. The program is still supported in

the plan; the commission felt there was not enough information to map sites. This proposed alteration has no impact on the EIR; the plan still calls for the development of a TDC program.

By Chapter

Chapter 1.0

No Changes

Chapter 2.0

Pg. 2-1 Reference to page 2-26 in footnote should reference page 2-25
Pg. 2-1 last paragraph may need revision to reflect additional population and dwelling unit figures
Pg. 2.0-3 on - Summary table needs to be revised to show cumulative impacts and should be checked for language changes in policies and programs

Chapter 3.0

General Note: Buildout of the Area Plan is projected in 2019 to 2031 depending on the subarea.
Page 3-4, Section 3.2.3 – The last sentence should be revised to say "Potential effects on the City are discussed through cumulative analyses in various sections of the EIR where a nexus exists (e.g., traffic, wastewater)." Buildout of the City of Morro Bay should be added as section 3.6.3 on page 3-29 and sections where the City is included in the analysis should be specified.
Page 3-11 – Add parenthesis first paragraph to enclose "July 2003"
Page 3-12 – Table 3-7 should be updated to specifically reference pages and numbering as shown in the plan (also Table 3-9 and 3-11)
Page 3-14 – Delete "net"
Page 3-16 – Figure 3-3 should appear on page 3-15
Page 3-25 – Delete references to specific TDCR and TDCS sites.
Page 3-26 – Note under (3) that buildout includes a 0.90 carrying capacity factor
Page 3-26 – Revise units and population numbers pursuant to Pollard density change
Page 3-27 – Revise Table 3-13 to account for Pollard

Chapter 4.0

No changes

Chapter 5.1

No changes.

Chapter 5.2

Page 5.2-3 – Revise to state that county is in attainment with ozone standards.

Page 5.2-5 - As shown in the attached table (from the CAP), the CAP projects population through 2015. Buildout of the Area Plan is projected in 2019 to 2031 depending on the subarea. The projected population for 2015 as shown in the area plan (Table 2-5) and the CAP (attached table) is compared below.

	CAP 2015 Population	EAP 2015 Population	Difference – EAP vs. CAP
Cayucos	4,202	4,050	(152)
Los Osos	17,488	18,220	732
Rural	1,456	1,250	(206)
Total	23,146	23,520	374

It should be noted in Section 5.2 that although the plan projects a higher population in 2015 than the CAP, projections for Cayucos and the Rural Area are actually lower than the CAP. It should also be noted that the projections are based on a growth rate proposed in the Area Plan in Chapter 2. The rate shown in the CAP is 1.1%, while the plan proposes a rate of 2.3%, beginning in 2006. Buildout figures may need revision to accommodate changes proposed for Pollard.

Chapter 5.3

No change

Chapter 5.4

Page 5.4-3 – Figure 5.4-1 should be deleted or revised to more clearly show boundary
Page 5.4-7 – If changes to Cayucos assumptions are needed, could be noted on this page
Page 5.4-10 – Footnote 24 missing
Page 5.4-14 – Footnote reference in text is misnumbered
Page 5.4-15 – Third paragraph, fifth line should be revised to "…requiring evidence of adequate water supplies at buildout prior to subdivision approval."
Page 5.4-16 – Impact statement is incorrect – should reflect text on following page that impacts are significant and unavoidable
Pg. 5.4-17 – Revise Table 5.4-7 of the EIR to include Pollard, and to reflect water demand and supply without Nacimiento water.
Page 5.4-21 and 5.4-22 last paragraph and 5.4-23 Los Osos – proof of adequate services is only required prior to subdivision of land. A will-serve letter is considered adequate for other permit actions. The reader should note that the County and water purveyors must serve legal lots of record; therefore the burden for additional impact assessment must lie with proposed subdivisions. Also, the statement of minimum development vis-à-vis takings applies in single-family categories only – RMF densities were set at 10 units to the acre, which more accurately reflects a high-density single family designation, being

below the 12-15 unit to the acre norm for multi-family. The text should be amended to clarify this point. The proposed increase in density for the Pollard property is an exception to the stated rule, as are bonuses for senior, affordable, mixed use and granny unit housing. The Pollard exception is predicated on additional water supplies, so is not seen as inconsistent. Other density bonuses are discretionary therefore there are opportunities to assess water supply impacts as such projects are proposed. One senior housing project at 38 units to the acre was assumed for Los Osos. Elsewhere, it is considered too speculative to assess the potential demand and supply impacts.

Chapter 5.5

Page 5.5-7 – Revise Table 5.5-2 to accommodate Pollard

Chapter 5.6

No change.

Chapter 5.7

No change.

Chapter 5.8

Page 5.8-18 – First paragraph, line 5 should reference Los Osos Dune Sands ESHA, Figure 7-48, page 7-119 of the Plan
Page 5.8-24 and 25 – Adjust last two bullets
Page 5.8-27 – Adjust paragraph spacing
Page 5.8-27 – "The proposed Estero Area Plan supports the designation of [portions] of the Estero Area as ESHA…"
Page 5.8-27 – "This is reflected in the proposed plan…" should be clarified along the lines of the following:
Page 5.8-28 – "…maximum protection of habitat resources under the law.." is not accurate. Should be revised to say "…The policies and programs therein support the development of an HCP and in general, the reduction of densities to the minimum allowable under the law. Exceptions include RMF categories; however, proposed densities are below standard multi-family densities (10 units to the acre versus the usual 12-15)." Specific statement about consistency could be revised as the HCP progresses.
Page 5.8-31 – Third paragraph "…is preparing"
Page 5.8-31 – delete second to last "the" in last bullet
Page 5.8-33 – Add Figure 5.8-3, Vegetation Map specific to Los Osos
Page 5.8-34 – Mitigation measures BR-5, BR-6, BR-7, and BR-11 have been included in the plan already and should be stricken from the EIR.

Chapter 5.9

No change

Chapter 5.10

Page 5.10-18 – The intent was to include attendant lighting impacts with statements regarding urbanization. The planning commission has tentatively approved a number of lighting control measures which should be referenced in the EIR.

NOTE: previous errata stated that Appendix 5.10 was missing; it was not missing.

Chapter 5.11

Page 5.11-4 and 5 – Update text and map as previously submitted

Chapter 5.12

No change

Chapter 6.0

Page 6-1 – Restate cumulative impact significance here

Chapter 7.0

No change

Chapter 10.0 Response to Comments –

Page 10-37 - Responses to Comments were issued early on in the process – in one case, tentative decisions made by the planning commission and subsequent work performed by staff have yielded a better informed response to the Coastal Commission.

Response to 6-3:

Add after first sentence: In response, County staff have drafted Appendix G of the plan, which serves to provide the requested additional information.

Errata – Estero Area Plan EIR – May 4, 2004

(1) Appendix 5.10 is missing from the printed FEIR document. The final version will be amended to include the appendix.

(2) Commissioner Liberto-Blanck requests additional information regarding the San Simeon Fault and earthquake and improvement of the fault map in Section 5.11. The revised map is attached as Exhibit A. The new graphic is a version of the fault hazard map in the County Safety Element.

The following text should precede the Hosgri Fault Zone description on page 5.11-4 (excerpted in part from the County Safety Element):

San Simeon-Hosgri Fault Zone. The Hosgri fault is the southern extension of the San Gregorio Fault Zone, which begins offshore near San Francisco. The San Simeon-Hosgri fault system generally consists of two fault zones: the Hosgri fault zone represented by a series of faults that are mapped off the San Luis Obispo County coast; and the San Simeon fault zone, which branches off the Hosgri, and comes onshore near the pier at San Simeon Point. Studies by Hanson and Lettis (1994) and Hall and others (1994) show that the San Simeon fault zone is a narrow zone or a single fault at San Simeon Bay, but that north of the bay, it splinters into several branches. Based on displaced Holocene-aged sediments, investigators estimate Holocene-age slip rates in the range of 1 to 3 mm/yr. Two of the San Simeon fault strands yield net slip estimates of 3 to 7 feet per event. On the basis of the slope rate and net slope per event, Hall and others (1994) estimated a recurrence interval of 600 to 1,800 years for large surface events on the fault. These studies have determined that the San Simeon fault zone shows multiple displacements of Holocene deposits. Therefore, the fault is considered to be active (Jennings, 1994), and a Earthquake Fault Zone has been established along strands of the fault by the Division of Mines and Geology under the Alquist-Priolo Act.

[INSERT Hosgri Fault Zone TEXT from EIR]

SAN LUIS OBISPO COUNTY
DEPARTMENT OF PLANNING AND BUILDING

VICTOR HOLANDA, AICP
DIRECTOR

July 22, 2004

Notice of Availability of Review Draft Planning Commission-Recommended Plan

ESTERO AREA PLAN UPDATE, INCLUDING AMENDMENTS TO THE ADELAIDA AND SAN LUIS OBISPO AREA PLANS AND THE COASTAL ZONE LAND USE ORDINANCE

A. What is the Estero Area Plan? Why Does it Need to Be Updated?

The Estero Area Plan is the general plan, circulation (transportation) element, and Coastal Plan for the communities of Los Osos, Cayucos and surrounding rural areas. It contains zoning, policies, programs, and standards to guide future land use and transportation. The update of the Estero Area Plan includes changes to zoning, policies, standards, programs, and information regarding land use and transportation. The plan is being updated to better reflect community wants and needs for the next 20 years. It has not been updated since it was developed in the early 1980's.

B. What are the Amendments to the Adelaida and San Luis Obispo Area Plans?

Revisions to the Adelaida and San Luis Obispo Area Plans and the Coastal Zone Land Use Ordinance will be considered concurrently with the Estero Area Plan Update. In the Adelaida Area Plan, a "planning impact area" is proposed, within which certain proposed applications for development would be referred to the Cayucos Citizens Advisory Council for review and comment. In addition, the proposed standards for the Estero Marine Terminal property within the Estero Planning Area are also proposed to be applied to the portion of that ownership that lies within the Adelaida Planning Area. In the San Luis Obispo Area Plan, a planning impact area is also proposed, within which discretionary applications would be referred to the Los Osos Community Advisory Council for review and comment. In addition, the boundary between the San Luis Obispo and Estero Planning Areas is proposed to be revised by including within the Estero Planning Area portions of Cuesta College and Camp San Luis Obispo that are within the coastal zone.

C. What are the Amendments to the Coastal Zone Land Use Ordinance?

A package of amendments to the Coastal Zone Land Use Ordinance includes many standards that were formerly proposed to apply only within the Estero Planning Area, but that are now proposed to apply throughout the coastal zone. The amendments modify existing development standards and establish new standards for water quality and drainage, road and bridge construction and maintenance, archaeological resources, visual resources, energy conservation, a community-based transfer of development credits (TDC) program for Los Osos, and appeals within unmapped environmentally sensitive habitats.

D. How Have Communities Participated in the Estero Area Plan Update?

The Estero Area Plan Update and related amendments to the Adelaida and San Luis Obispo Area Plans and the Coastal Zone Land Use Ordinance generally reflect recommendations made by the Cayucos Citizens Advisory Council and the Los Osos Community Advisory Council at numerous public meetings spanning several years. The County Department of Planning and Building has worked closely with those advisory councils, as well as with other groups, agencies and individuals, to prepare the Estero Area Plan Update and associated amendments to the Adelaida and San Luis Obispo Area Plans and the Coastal Zone Land Use Ordinance. In addition, in making its recommendations, the County Planning Commission considered testimony and correspondence from the public and advisory councils during 13 public hearings.

E. What are the Next Steps in the Estero Area Plan Update, and Where is the Update in the Process?

- ✓ Public Hearing Draft Plan, Draft EIR, Final EIR
- ✓ Planning Commission Public Hearings
- ✓ Planning Commission-Recommended Plan
- ❒ Board of Supervisors Public Hearings (tentative dates: 9/28/04, 10/5/04, 10/19/04)
- ❒ Review by California Coastal Commission

F. How and When Can I Comment on the Planning Commission-Recommended Plan and Related Amendments?

Public participation is encouraged. Comments on the Planning Commission-Recommended Plan are best submitted prior to the Board of Supervisors hearings that are tentatively scheduled for September 28, October 5 and October 19, 2004. Written comments are preferred. Interested persons and groups may also wish to attend the Board of Supervisors public hearings to speak for or against the proposals in the Planning Commission-Recommended Plan and related amendments.

F. Where Can I Obtain the Planning Commission-Recommended Plan and Related Amendments?

Copies are available for review at libraries in Cayucos, Morro Bay, Los Osos, and San Luis Obispo, and at the Cal Poly library. They are also available for review or for purchase at the Department of Planning and Building. The Plan, related amendments and the Final EIR can also soon be viewed on the Department of Planning and Building's website: www.sloplanning.org (click on "Coastal Zone" and then "Estero LCP Planning Commission-Recommend Plan" or "Estero EIR Final"). To obtain a copy by mail, please contact the Planning and Building Department by phone, FAX or E-mail (see below).

Have Questions?

Please contact Mike Wulkan, Senior Planner or Nancy Orton, Environmental Specialist

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FINAL ENVIRONMENTAL IMPACT REPORT
for the
ESTERO AREA PLAN

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Prepared for:

THE COUNTY OF SAN LUIS OBISPO
SAN LUIS OBISPO COUNTY DEPARTMENT OF PLANNING & BUILDING

****

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641 Higuera Street, Suite 302
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December 2003

CONTENTS

			Page
1.0	INTRODUCTION		1-1
	1.1	How To Use This EIR	1-2
	1.2	Purpose/Legal Requirements	1-2
	1.3	Scope & Content	1-3
	1.4	Lead, Responsible, & Trustee Agencies	1-4
	1.5	Environmental Impact Review Process	1-4
	1.6	Project Objectives	1-5
	1.7	Proposed Estero Area Plan	1-9
2.0	SUMMARY		2-1
	2.1	Summary	2-1
	2.2	Summary of Impacts, Mitigation Measures & Alternatives	2-2
	2.3	Summary Table	2-3
3.0	PROJECT DESCRIPTION		3-1
	3.1	Project Background	3-1
	3.2	Project Location	3-1
	3.3	Existing Conditions	3-4
	3.4	Proposed Project Conditions	3-7
	3.5	Combining Designations	3-21
	3.6	Buildout Under the Proposed Area Plan	3-26
4.0	ENVIRONMENTAL SETTING		4-1
	4.1	Historical Perspective	4-1
	4.2	General Physical Setting	4-2
	4.3	Subarea-Specific Setting	4-4
	4.4	Consistency with Plans and Policies	4-6
5.0	IMPACT SECTIONS		5-1
	5.1	Transportation & Circulation	5.1-1
	5.2	Air Quality	5.2-1
	5.3	Noise	5.3-1
	5.4	Water Resources	5.4-1
	5.5	Wastewater	5.5-1
	5.6	Drainage & Water Quality	5.6-1
	5.7	Public Services	5.7-1
	5.8	Biological Resources	5.8-1
	5.9	Agricultural Resources	5.9-1
	5.10	Aesthetics	5.10-1
	5.11	Geologic Conditions	5.11-1
	5.12	Cultural Resources	5.12-1

CONTENTS (Continued)

			Page
6.0	OTHER CEQA SECTIONS		6-1
	6.1	Cumulative Impacts	6-1
	6.2	Growth-Inducing Impacts	6-1
	6.3	Significant and Unavoidable Impacts if Estero Area Plan is Implemented	6-2
	6.4	Significant Irreversible Environmental Changes	6-2
7.0	ALTERNATIVES		7-1
	7.1	Description of Alternatives	7-2
	7.2	Analysis of Alternatives for the Estero Planning Area	7-3
	7.3	Environmentally Superior Alternative	7-4
8.0	LIST OF PREPARERS/INDIVIDUALS & AGENCIES CONTACTED		8-1
	8.1	Preparers	8-1
	8.2	Individuals and Agencies Contacted	8-1
9.0	REFERENCES		9-1
10.0	RESPONSE TO COMMENTS		10-1

APPENDICES

Appendix 1.0	Initial Study/NOP
Appendix 2.0	Mitigation Reporting Plan
Appendix 5.10	Sensitive Visual Resource Areas
Appendix 7.0	Draft Alternatives

LIST OF FIGURES

Figure		Page
3-1	Location of Estero Planning Area	3-2
3-2	Estero Area and Secondary Study Areas	3-3
3-3	Cayucos Map	3-16
3-4	Los Osos Map	3-18
5.2-1	Temperature Inversion	5.2-2
5.3-1	Common Noise Levels and Public Reaction	5.3-3
5.3-2	Percent Change in Annual Average Daily Traffic Compared to Traffic Noise Level	5.3-6
5.4-1	Chorro Reservoir Service Area	5.4-3
5.4-2	Estero Basins	5.4-6
5.6-1	Natural Drainage Areas	5.6-3
5.6-2	Flood Hazard Areas	5.6-4
5.7-1	School District Boundaries in the Estero Planning Area	5.7-4
5.8-1	Major Plant Communities in the Estero Planning Area	5.8-3
5.8-2	USFWS Recovery Areas	5.8-33
5.9-1	Prime Agricultural Land	5.9-2
5.9-2	Agricultural Lands Under the Williamson Act (LCA) Contract and Agricultural Preserves	5.9-6
5.10-1	Visual impact flowchart	5.10-7
5.10-2	Impacts AES-2 through AES-4	5.10-12
5.10-3	Los Osos Impact Areas	5.10-14
5.10-4	Impact AES-5 through AES-7	5.10-17
5.11-1	Seismic Hazards	5.11-5
5.11-2	Los Osos Special Studies Zone	5.11-15

LIST OF TABLES

Table		Page
2-1	Summary of Impacts and Mitigation	2-3
3-1	Acres in Study Area Proposed Plan	3-4
3-2	Estero Planning Area Land Use Category Changes 1988-2003	3-5
3-3	Allowable Land Uses (not all inclusive)	3-6
3-4	Total Acres in Each Land Use Category, Existing Plan	3-7
3-5	Planning Area Land Use Changes	3-10
3-6	Land Use Changes, Rural Estero	3-11
3-7	Rural Estero: Selected Policies, Programs & Standards	3-12
3-8	Land Use Changes, Cayucos	3-14
3-9	Cayucos and Vicinity Selected Policies, Programs & Standards	3-14
3-10	Land use Changes, Los Osos	3-17
3-11	Selected Policies, Programs and Standards for Los Osos	3-21
3-12	Sensitive Resource Areas in Sensitive Habitats	3-26
3-13	Proposed Area Plan Residential Buildout	3-30
3-14	Non-residential Buildout (in Square Feet)	3-31
3-15	Existing and Planned Activity at Major Public Institutions	3-32
5.1-1	Rural Estero-Existing Roadway Levels of Service	5.1-4
5.1-2	Cayucos Community-Existing Roadway Levels of Service	5.1-5
5.1-3	Los Osos Urban Area-Existing Roadway Levels of Service	5.1-7
5.1-4	Los Osos Community-Existing Intersection Levels of Service	5.1-8
5.1-5	Rural Estero - Future Roadway Levels of Service	5.1-9
5.1-6	Cayucos Community - Future Roadway Levels of Service	5.1-10
5.1-7	Los Osos - Future Roadway Levels of Service - without Improvements	5.1-11
5.1-8	Los Osos - Future Roadway Levels of Service - with Improvements	5.1-12
5.1-9	Los Osos - Future Intersection Levels of Service with no Improvements	5.1-13
5.1-10	Recommended Roadway Improvements	5.1-14
5.1-11	Recommended Intersection Improvements	5.1-16
5.2-1	Number of Days Exceeding the State Ozone Standard	5.2-3
5.2-2	Number of Days Exceeding the State PM10 Standard	5.2-3
5.2-3	State and Federal Ambient Air Quality Standards	5.2-8
5.3-1	Noise Contour Data: Distance (feet) from Center of Roadway to L_{dn} Contours	5.3-4
5.3-2	Maximum Allowable Noise Exposure: Transportation Noise Sources	5.3-5
5.3-3	Maximum Allowable Noise Exposure: Stationary Noise Sources	5.3-5
5.3-4	Subjective Reaction to Changes in Noise Levels of Similar Sources	5.3-7
5.3-5	Noise Increases on Area Roadways	5.3-9
5.3-6	Noise-Reducing Planning Area Policies & Standards (not all-inclusive)	5.3-10
5.4-1	State Water Entitlements	5.4-2
5.4-2	Estero Area Groundwater Basins-Storage Availability and Safe Annual Yield	5.4-4
5.4-3	Total Water Consumption in Acre-Feet Per Year (AF/Y): Morro Bay	5.4-9
5.4-4	Cayucos Area Water Purveyors	5.4-11
5.4-5	Nacimiento Water Project Participants	5.4-11
5.4-6	Water Consumption for Rural Estero	5.4-14
5.4-7	Water Consumption for Cayucos	5.4-15
5.4-8	Water Consumption for Cayucos Fringe	5.4-17
5.4-9	Water Consumption for Los Osos	5.4-17
5.4-10	Water Consumption for Other Watershed Area	5.4-19

5.5-1	Rural Estero Wastewater Calculations	5.5-4
5.5-2	Cayucos Wastewater Calculations	5.5-6
5.5-3	Cayucos Fringe Wastewater Calculations	5.5-6
5.5-4	Other Watershed Wastewater Calculations	5.5-9
5.5-5	Public Facilities Wastewater Calculations	5.5-9
5.7-1	Capacity and Enrollment, Estero Area Schools	5.7-2
5.7-2	Public Facilities Fees	5.7-5
5.7-3	Neighborhood and Community Park Acreage	5.7-7
5.7-4	Library Facilities (2002)	5.7-7
5.8-1	Estero Planning Area Sensitive Plant Taxa	5.8-9
5.8-2	Estero Planning Area Sensitive Animal Taxa	5.8-11
5.9-1	Summary of Lands Subject to LCA Contracts	5.9-4
5.9-2	Proposed Changes in Acres Designated for Agricultural Use	5.9-8
5.10-1	Significance Thresholds for Visibility and Visual Quality	5.10-7
5.10-2	Visual Quality	5.10-8
5.11-1	Geologic Units Within the Estero Planning Area	5.11-2
7-1	Comparison of New Draft Estero Area Plan With the Prior Alternatives (Totals at Buildout)	7-1
7-2	Comparison of 2003 Draft Estero Area Plan With Alternatives (Totals at Buildout)	7-3

1.0 Introduction

This document is an Environmental Impact Report (EIR) that evaluates the potential adverse environmental consequences associated with the proposed ~~project. The proposed project is an~~ update of the Estero Area Plan, originally adopted in 1988. The Estero planning area encompasses approximately 71.5 square miles (including the city of Morro Bay) along the northwest coast of San Luis Obispo County, surrounding the City of Morro Bay (see Figure 3-2). The proposed Estero Area Plan includes changes and clarifications of the land use policies, standards and programs for the Estero planning area and presents a number of land use changes from the current area plan. The ~~project is being offered~~ draft plan was prepared by the San Luis Obispo County Department of Planning and Building.

Background

An update of the 1988 Estero Area Plan was prepared in 2000. An EIR was prepared which analyzed the environmental effects of the proposed plan. Comments received on the 2000 Area Plan and EIR, including the California Coastal Commission, among other, resulted in the need for a wholesale revision of the plan. The current 2003 Public Hearing Draft Area Plan is a revision of the 2000 Public Hearing Draft Area Plan ~~based on comments received~~. The DEIR has herein been revised to reflect the 2003 Draft Area Plan. The DEIR is being recirculated along with the 2003 Area Plan. Changes to the Draft Area Plan since the 2000 version include, but are not limited to:

- Reduction in buildout in Los Osos and Cayucos
- Greater protection of natural resources
- Other changes based on comments received by the Coastal Commission, county departments and other agencies, advisory councils, other groups, and individuals

Changes to the DEIR include, but are not limited to:

- Update of buildout tables and all relevant calculations
- Update of policies, programs and standards referenced
- Update of background information including water supply, wastewater treatment, and circulation
- Removal of Section 5.13, "Electromagnetic Impacts."

Section 5.13 was eliminated based on the lack of definitive information regarding electromagnetic fields and their potential impacts.



Throughout this document the reader will note the referral to the Coastal Zone Land Use Ordinance (CZLUO) amendment package. The proposed amendments to the CZLUO have not yet been finalized or adopted and therefore cannot be considered mitigation in this EIR. However, the amendment package provides context regarding the County's plans for environmental preservation in the Coastal Zone. If adopted, the CZLUO amendments will apply throughout the Estero Area.

1.1 How to Use This EIR

This EIR describes the environmental effects of land development that would be allowed under the proposed Estero Area Plan. In describing these effects, the EIR takes into account other growth expected in areas surrounding the Estero planning area. Impacts of potential development within the Estero planning area and other cumulative development within the region are combined to show how future growth would affect the environment. The organization of the EIR is intended to make it as easy as possible for all EIR reviewers.

Section 2.0 (immediately following this Introduction) summarizes the impacts, mitigation measures, and residual impacts in tabular form.

Sections 3.0 and 4.0, "Project Description" and "Environmental Setting", respectively, describe the proposed project (Proposed Estero Area Plan), the development proposed within the Estero planning area, and the physical setting of the Estero area.

Section 5.0, "Impact Analysis", describes the impacts of projected development under buildout of the plan and proposes mitigation measures which would reduce these impacts to the extent feasible. The initial study determined that this project may have impacts with respect to many issues including traffic and water consumption (see Section 1.3, Scope and Content for discussion). Section 5.0 evaluates these impacts using a systematic approach. Each issue area is analyzed separately and the discussion is further divided into four parts: Setting, Significance Thresholds, Impact Analysis and Mitigation Measures, and Cumulative Impacts. The Setting discussion describes the existing environmental and/or regulatory conditions affecting the Estero planning area. This information forms the "baseline conditions" for which the impacts of the Draft Area Plan will be evaluated. The Significance Thresholds section describes the criteria that are used to determine the significance of impacts. The Impact Analysis and Mitigation Measures section evaluates impacts against accepted thresholds to determine if any of these impacts are significant and proposes actions which would lessen or eliminate the significant impacts identified in the impact analysis. The Cumulative Impacts discussion examines the impacts of the proposed project in the appropriate regional context.

Section 6.0 describes the general long-term impacts of the proposed project. This part of the EIR also evaluates the impacts of several alternatives to the project (Section 7.0), but in less detail than the discussion for the proposed project. At the end of the discussion of alternatives, the EIR determines which alternative (including the proposed project) is "environmentally superior" for each issue area. This information is useful to decision-makers to help them determine the conditions of project approval, if any.

The remainder of this introductory section discusses some of the legal requirements and contents of the EIR in greater detail.

1.2 Purpose/Legal Requirements

This EIR has been prepared in accordance with the California Environmental Quality Act (CEQA) and the State CEQA Guidelines. In accordance with Section 15121(a) of the State CEQA Guidelines(California Code of Regulations, Title 14, Division 6, Chapter 3), the purpose of this EIR is to serve as an informational document that:

> "... will inform public agency decision-makers and the public generally of the significant environmental effect of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project ..."

In response to the decision in *Environmental Information and Planning Council vs. County of El Dorado* (1982), this EIR evaluates the Draft Estero Area Plan on the basis of existing development rather than merely comparing plan

goals to those of previous plans. This approach provides a more realistic assessment of how implementation of the plan elements will affect the current state of the Estero planning area.

1.3 Scope & Content

In accordance with the State CEQA Guidelines, the County of San Luis Obispo, as Lead Agency, solicited comments from the public through the distribution of a Notice of Preparation (NOP) (Appendix 1.0). The Initial Study and comments received in response to the NOP were the basis for the technical focus of this EIR. The scope of the EIR includes analysis of the environmental impacts of the proposed project in the following issue areas:

- Transportation and Circulation
- Air Quality
- Noise
- Water Resources
- Wastewater
- Drainage, Erosion and Sedimentation
- Public Services
- Biological Resources
- Agricultural Resources
- Visual Resources
- Geologic Resources
- Cultural Resources

Each issue area is analyzed in regard to both project and cumulative impacts. The potential growth-inducing impacts of the project are also analyzed. Environmental impacts related to issues not analyzed in this EIR were determined in the Initial Environmental Study to be less than significant (see Appendix 1.0, Initial Study, Notice of Preparation and Comment Letters).

The preparation of an EIR necessarily involves some degree of forecasting and speculation. The CEQA Guidelines speak to these issues as follows:

- *15144. Forecasting.* Drafting an EIR necessarily involves some degree of forecasting. While foreseeing the unforeseeable is not possible, an agency must use its best efforts to find out and disclose all that it reasonably can.
- *15145. Speculation.* If, after thorough investigation, a Lead Agency finds that a particular impact is too speculative for evaluation, the Agency should note its conclusion and terminate discussion of the impact.
- *15146. Degree of Specificity.* The degree of specificity required by an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR.
  - An EIR on a construction project will necessarily be more detailed in the specific effects of the project than will be an EIR on the adoption of a local general plan or comprehensive zoning ordinance because the effects of the construction can be predicted with greater accuracy.
  - An EIR on a project such as the adoption or amendment of a comprehensive zoning ordinance or local general plan should focus on the secondary effects that can be expected to follow from the adoption or amendment, but the EIR need not be as detailed as an EIR on the specific construction projects that might follow.

This EIR focuses on the impacts that could result from the implementation of the Area Plan. The degree of specificity corresponds to the degree of specificity contained in the plan.

Section 7.0, "Alternatives", is prepared in accordance with Section 15126(d) of the State CEQA Guidelines and California court decisions. The alternatives section describes a range of reasonable alternatives which could feasiblely attain the basic objectives of the proposed project and identifies environmentally superior alternatives.

1.4 Lead, Responsible, & Trustee Agencies

The County of San Luis Obispo is the lead agency with respect to fulfilling CEQA requirements for the proposed project. Section 15367 of the State CEQA Guidelines defines the lead agency as "the public agency which has the principal responsibility for carrying out or approving a proposed project."

The California Coastal Commission has discretionary approval power over the proposed project as a responsible agency pursuant to Section 15381. Pursuant to Section 15386, trustee agencies for the project include all state agencies having jurisdiction over natural resources affected by project implementation, including the California Department of Fish and Game and the State Water Resources Control Board.

1.5 Environmental Impact Review Process

The environmental impact review process, as required under CEQA, is outlined below. The steps are presented in sequential order.

1. **Notice of Preparation (NOP) Mailed**. Immediately after deciding that an EIR is required, the lead agency must file a NOP soliciting input on the EIR scope to "responsible," "trustee," and involved federal agencies; to the State Clearinghouse, if one or more state agencies is a responsible or trustee agency; and to parties previously requesting notice in writing (State CEQA Guidelines Section 15082; Public Resources Code Section 21092.2). The NOP must be posted in the County Clerk's office for 30 days. A scoping meeting to solicit public input on the issues to be assessed in the EIR is required for projects of "statewide, regional or areawide importance."

   An NOP was prepared for the 2000 Draft Environmental Impact Report (DEIR) and a number of meetings were held to obtain public comment on the scope and content of the DEIR. A new NOP and scoping meeting is not required for the recirculation, since those objectives were met during preparation and review of the 2000 DEIR. Comments received on the initial NOP are included in the administrative record.

2. **DEIR Prepared**. The DEIR must contain: a) table of contents or index; b) summary; c) project description; d) environmental setting; e) significant impacts (direct, indirect, cumulative, growth inducing and unavoidable impacts); f) alternatives; g) mitigation measures; h) irreversible changes (required only in EIRs on plans, policies, ordinances, [LAFCO] actions and joint National Environmental Protection Agency [NEPA] documents).

   A DEIR was prepared for the 2000 Estero Area Plan Update. This document is a revision of the previous DEIR incorporating the land use, policies, programs and standards contained in the 2003 Update of the Estero Area Plan.

3. **Public Notice and Review.** A lead agency must prepare a Public Notice of Availability of an EIR. The Notice must be placed in the County Clerk's office for 30 days (Public Resources Code Section 21092). The lead agency must send a copy of its Notice to anyone requesting it (State CEQA Guidelines Section 15087). Additionally, public notice of DEIR availability must be given through at least one of the following procedures: a) publication in a newspaper of general circulation; b) posting on and off the project site; and c) direct mailing to owners and occupants of contiguous properties. The lead agency must consult with and request comments on the DEIR from responsible and trustee agencies, and adjacent cities and counties (Public Resources Code Sections 21104 and 21253). The minimum public review period for a DEIR is 30 days. When a DEIR is sent to the State Clearinghouse for review, the public review period must be 45 days unless a shorter period is approved by the Clearinghouse (Public Resources Code 21091). Distribution of the DEIR may be required through the State Clearinghouse

(State CEQA Guidelines Section 15305). CEQA does not require public hearings on the DEIR, although in practice, most agencies conduct such hearings.

The 2000 DEIR was circulated for public comment; comments received on the 2000 DEIR are not included in this version, but are included in the administrative record for the project, pursuant to Section 15088.5(f)(1) of the *CEQA Guidelines*. Commenters are advised to submit new comments specific to this DEIR.

4. **Notice of Completion**. A lead agency must file a Notice of Completion with the State Clearinghouse as soon as it completes a DEIR.

5. **Final EIR (FEIR)**. A FEIR must include: a) the DEIR; b) copies of comments received during public review; c) list of persons and entities commenting; and d) responses to comments.

6. **Certification of FEIR.** The lead agency shall certify: a) the FEIR has been completed in compliance with CEQA; b) the FEIR was presented to the decision-making body of the lead agency; and c) the decision-making body reviewed and considered the information in the FEIR prior to approving a project (State CEQA Guidelines Section 15090).

7. **Lead Agency Project Decision**. A lead agency may: a) disapprove a project because of its significant environmental effects; b) require changes to a project to reduce or avoid significant environmental effects; or c) approve a project despite its significant environmental effects, if the proper findings and statement of overriding considerations are adopted (State CEQA Guidelines Sections 15042 and 15043).

8. **Findings/Statement of Overriding Considerations**. For each significant impact of the project identified in the EIR, the lead or responsible agency must find, based on substantial evidence, that either: a) the project has been changed to avoid or substantially reduce the magnitude of the impact; b) changes to the project are within another agency's jurisdiction and such changes have or should be adopted; or c) specific economic, social, or other considerations make the mitigation measures or project alternatives infeasible (State CEQA Guidelines Section 15091). If an agency approves a project with unavoidable significant environmental effects, it must prepare a written Statement of Overriding Considerations that set forth the specific social, economic or other reasons supporting the agency's decision.

9. **Mitigation Monitoring/Reporting Program.** When an agency makes findings on significant effects identified in the EIR, the agency must adopt a reporting or monitoring program for mitigation measures that were adopted or made conditions of project approval to mitigate significant effects.

10. **Notice of Determination.** An agency must file a Notice of Determination after deciding to approve a project for which an EIR is prepared (State CEQA Guidelines Section 15094). A local agency must file the Notice with the County Clerk. The Notice must be posted for 30 days and sent to anyone previously requesting notice. Posting of the Notice starts a 30-day statute of limitations on CEQA challenges (Public Resources Code Section 21167[c]).

1.6 Project Objectives

The proposed Estero Area Plan contains a number of general goals which further define the goals of the County Land Use Element and specifically address the issues facing the planning area. These are listed below for the communities of Los Osos and Cayucos, and for Rural Estero[1].

[1] *Estero Area Plan Update, November 2002, Vision and General Goals, Public Review Draft,* pp 1-10 - 1-14.

"The following general goals provide the direction for the Estero Area Plan and the vision for the future of this area. These goals, together with policies, programs, standards, and other parts of the Land Use Element (LUE) and Local Coastal Program (LCP), constitute the plan for the Estero planning area for the next 20 years.

The goals are specific to the Estero planning area. They were developed by the public; primarily, the communities of Los Osos and Cayucos. The goals are expanded on and implemented by the policies, programs and standards found in the following chapters. The goals are consistent with the countywide general goals of the Land Use Element found in Coastal Zone Framework for Planning, but further refine and elaborate on those countywide goals.

The goals also function as *criteria* to help determine consistency of development proposals with the LUE/LCP. New development should be located, designed, and built in a manner that furthers these general goals and complies with all other applicable regulations.

Planning Areawide

Provide maximum public access, and protect existing public access, to the coast, the shoreline, the bay, and public recreation areas, consistent with the need to protect natural resources and private property rights.

Los Osos

The community of Los Osos has developed a vision for its future. The following key goals express that vision. Other important aspects of this vision are described by policies in the following chapters.

The following goals are based on a "Vision Statement for Los Osos" that was approved by the Los Osos Community Advisory Council (LOCAC) on June 22, 1995. This statement is the product of substantial community involvement and hard work by LOCAC. It was developed after a community survey, neighborhood meetings, and public discussion of the vision statement itself. Although residents of Los Osos hold a diversity of opinions and community agreement can not be expected on all issues, this vision statement is intended to generally reflect the community's desires.

The vision statement describes a community where urban development is contained within the existing urban reserve line (URL). Development occurs at a controlled rate and is sustained by resources and services. The URL is clearly defined by a greenbelt, including productive agricultural lands and open space that are managed to protect the Morro Bay estuary.

In the vision statement, Los Osos maintains its small-town, rural atmosphere and is environmentally-oriented, yet promotes expanded tourism and environmentally-friendly businesses that provide jobs for local residents. Automobile transportation is accommodated, but the need for automobile travel is reduced by encouraging alternative transportation. For example, pedestrian activity is encouraged, especially in commercial areas. Los Osos takes advantage of its environmental assets, offers a high quality of life and exhibits a high degree of community involvement and local control over its future.

Los Osos desires to uphold its community values and scale, take control of its own destiny, discourage gated communities, encourage neighborhood and community continuity, and best of all, be a community that is unique - not a replica of some other vision or model.

Environment

1. Protect and enhance the Morro Bay Estuary so that it is a clean, healthy, functioning ecosystem that harbors a diversity of wildlife.

Economy

2. Improve and diversify the local economy to make Los Osos more economically self-sufficient.

Air Quality

3. Minimize the amount and length of automobile trips through planning decisions and land use practices.

Population Growth

4. Establish a maximum rate of growth within the Los Osos urban reserve line, consistent with available resources, services and infrastructure provided and the community's sense of place.

Distribution of Land Uses, Location and Timing of Urban Development

5. Focus on infill and mixed use development.

Residential, Commercial and Industrial Land Uses

6. Maintain a small-town, rural atmosphere.

7. Provide flexible zoning that enables businesses to expand and remain in the community, and establish incentives to encourage good design of commercial development.

Visitor-Serving, Recreation and Resort Development

8. Encourage development of tourist-oriented facilities.

9. Develop additional neighborhood and community parks and recreation facilities in order to serve existing and future populations.

Public Services and Facilities

10. Base all land use policies and plans on sustainable development that meets the needs of the current population and visitors without endangering the ability of the future population to meet its needs or drawing upon outside resources.

11. Carefully manage water resources to provide a clean, sustainable resource for the community.

Implementation and Administration

12. Promote a high level of community participation and voice in land use planning decisions. Ultimately, achieve self-governance.

Circulation (Taken from Chapter 5 of the Draft Estero Area Plan Update July 2003)

13. Complete and pave the community's grid street system.

14. Provide a balanced mix of all means of transportation.

15. Complete an integrated and well-designed pedestrian, bicycle, equestrian, and public transportation system that reduces dependency on the private automobile and minimizes the number of automobile trips.

Cayucos

The community of Cayucos has developed general community goals that were recommended by the Cayucos Citizens Advisory Council (CCAC) following public discussion. The goals encourage carefully planned development that respects the area's natural assets, maintains the community's small-town character as a beach community, and balances and promotes both the residential and visitor-serving aspects of the community.

Environment

1. Plan with consideration for preserving the natural environment of Cayucos. Protect the seashore and coastal area with minimal impairment of physical and visual accessibility.

2. Protect ecological systems and wildlife habitats.

3. Plan for land use to take full advantage of the natural and agricultural assets of the area.

Residential and Commercial Land Uses

4. Preserve the character of Cayucos as a beach community.

5. Stress the residential nature of the community.

6. Provide for essential services.

7. Plan for the visitor-serving and residential features of the community to coexist in harmony and supplement each other. Emphasize both features of the community and promote their excellent potential.

8. Carefully plan for future commercial and residential development that is consistent with the current nature of the community. Since major development projects can have a devastating effect on a small community, carefully examine such proposed projects to see that they do not destroy the character of the community or so dominate it as to cause an imbalance between the residential and recreational elements of the community.

9. Maintain the community's small-town character.

Compact Development

10. Focus on infill and mixed use development.

11. Create a greenbelt that forms a hard edge around the community and protects scenic qualities and sensitive habitat.

Rural Area

Distribution of Land Uses; Open Space

1. Maintain agriculture and the rural character of the area.

2. Permanently protect the agricultural, open space and scenic resources of the Morros.

3. Prevent further urban and suburban encroachment into the Los Osos and Chorro Valleys in order to maintain valuable agricultural and open space resources.

4. Preserve agriculture, open space and sensitive resources.

5. Manage the watershed of the Morro Bay estuary so that the estuary is a clean, healthy, functioning ecosystem that harbors a diversity of wildlife.

Planning Areawide (Taken from Chapter 5 of the Draft Estero Area Plan)

Circulation

1. Establish an efficient circulation system and pattern of land uses that minimize the number of automobile trips.

2. Encourage alternatives to single-occupant automobile travel, such as pedestrian and bicycle travel, transit, carpooling, and tele-commuting. At the same time, accommodate automobile transportation.

1.7 Proposed Estero Area Plan

The proposed Estero Area Plan defines the amount, location and quality of future land development for the Estero planning area and identifies areas to be preserved, to be left as is, etcetera. All land use-related decisions must be consistent with the proposed Estero Area Plan. The impact of the proposed Estero Area Plan constitutes the project analyzed in this EIR. The Estero planning area standards are the primary tool for preventing environmental impacts from development contemplated under the proposed Estero Area Plan. This EIR addresses the adequacy of these standards in reducing significant environmental impacts and, where needed, recommends additional mitigation measures in the form of policy language to augment environmental protection.

2.0 Summary

This section has been prepared in accordance with the State of California Environmental Quality Act (CEQA) Guidelines. This section is divided into two components. The first summarizes the characteristics of the Estero planning area and proposed project components and identifies areas of controversy known to the Lead Agency (County), while the second identifies the environmental impacts, mitigation measures, and residual impacts associated with the project and cumulative development. Additionally, project alternatives are summarized as part of this section.

2.1 Summary

2.1.1 Project Synopsis

The proposed project is an area plan intended to increase economic diversity and promote resource conservation in the Estero planning area. The proposed project is designed to slightly reduce the buildout population in the Estero planning area and to protect sensitive environments, while providing increased opportunities for economic growth.

For the Los Osos area, the proposed Estero Area Plan incorporates several strategies to encourage economic development. In the central business district, opportunities for commercial uses are increased, incentives for senior housing are provided, and pedestrian-oriented designs are encouraged. Elsewhere in Los Osos, the proposed Area Plan allows for a multi-use business park and additional tourist businesses. Resource conservation is promoted through establishment of standards, policies and programs to encourage habitat preservation through transfers of development credits, reduction of densities, strategic preservation of open space, creation of a greenbelt, and mitigation banking.

For Cayucos, significant features of the Estero Area Plan include the reclassification of ~~the agricultural preserve~~ agriculturally-zoned land to allow ~~commercial, tourist oriented, and/or residential development~~ residential development on an approximately 10-acre parcel within the urban reserve line. The proposed project is expected to result in a lower population at buildout compared to the existing area plan, and new commercial and tourist-oriented development residential growth would be limited to 2.3 percent per year under a proposed program[1]. Additional standards for the design of new development are intended to protect sensitive habitats and scenic views of the hillsides.

For Rural Estero, resource conservation is emphasized through the establishment of programs intended to protect marine resources using the National Marine Sanctuary, National Estuary and other designations, along with legislation, as vehicles for protection and management. Additional policies encourage preservation of agriculture, open space, and sensitive resources. Policies also encourage management of the Morro Bay Estuary and its watershed to slow sedimentation of the Morro Bay Estuary and ensure that it is a clean, healthy, functioning ecosystem that harbors a diversity of wildlife. Another policy encourages the County and the City of Morro Bay to develop a joint groundwater management program and to support efforts to protect water quality in Morro Bay.

Residential land uses proposed in the Estero Area Plan would accommodate 3,134 additional dwelling units and could result in 7,705 additional residents compared to the existing estimated 2003 situation. In contrast, an additional 10,028 residents could result under buildout conditions for the existing area plan. The projected population of the proposed area plan is larger than the existing population, but smaller than the projected

1 *Estero Area Plan Update*, July 2003, Population and Economy, Pp 2-26

population of the buildout of the existing area plan.[2]

Commercial land uses proposed in the Estero Area Plan could potentially increase square footage of the commercial land uses from about 805,900 square feet currently to about 1.26 million square feet.[3] Lodging capacity (excluding RV and camping units) would increase from the existing 251 units to 547 units under the proposed plan.[4]

Under the proposed plan, acreage in the Agriculture land use category has the largest decline(314 acres), Rural Lands increase slightly (48 acres), Open Space has the largest increase (646 acres), and acreage designated as Recreation decreases slightly by 38 acres. Land designated as Public Facilities increases by 382 acres, primarily because the parts of Cuesta College and Camp San Luis Obispo that lie within the coastal zone are incorporated into the Estero planning area under this plan update. The amount of acreage in the Residential Single Family category decreases by 200 acres.

2.1.2 Synopsis of Alternatives

The document includes analysis of three alternative development scenarios for the Estero planning area.

- **No Project (No Development).** This alternative assumes that no further development would take place. This No Project Alternative is the continuation of existing conditions with no additional development.
- **No Project (Existing Plan Buildout).** This alternative assumes that no new plan is adopted and that buildout under the land use policies of the existing area plan will occur.
- **Morro Shores/Sweet Springs Corridor Alternative.** This alternative clusters development in the Morro Shores and Sweet Springs area in order to provide a wildlife and passive recreational corridor.

The Morro Shores/Sweet Springs Corridor Alternative is the environmentally superior alternative.

2.2 Summary of Impacts, Mitigation Measures & Alternatives

The summary included in Table 2-1 identifies four types of potential project impacts that are associated with the proposed project:

Class I: Significant, unavoidable, adverse impacts for which "specific economic, social or other considerations make infeasible the mitigation measures or project alternatives identified in the final EIR." If the County decides to approve the project, a Statement of Overriding Considerations must be adopted for any identified Class I impacts, as required by CEQA Guidelines Section 15093(b).

Class II: Significant adverse impacts that can be feasiblely mitigated to less than significant levels. CEQA Guidelines Section 15091(a)(1) requires that "Findings" be made indicating that changes or alterations have been required in the project to substantially lessen these impacts.

Class III: Adverse impacts that have been found to be less than significant.

Class IV: Beneficial impacts.

The table is organized by topic (e.g., Biology, Air Quality, etc.). Mitigation measures, residual impacts, and alternatives are described in the impact summary.

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2 Calculations from *Revised Public Hearing Draft Plan Buildout Summary*, May 2003

3 *Estero Area Plan Update*, July 2003, Population and Economy, Pp. 2-12

4 *Estero Area Plan Update*, July 2003, Population and Economy, Pp. 2-11

Table 2-1. Summary of Impacts and Mitigation				
Impacts	**Significance**	**Area Plan Policies and Standards**	**Mitigation**	**Residual Impact**
5.1 Transportation and Circulation				
Impact TC-1: The data listed in Table 5.1-5 indicate that South Bay Boulevard between State Park Road and Turri Road is projected to operate at LOS F. State Route 1 through Morro Bay is expected to operate at LOS E. Traffic on South Bay Boulevard is primarily comprised of commuter traffic traveling between Morro Bay and Los Osos and recreational traffic traveling to and from Morro Bay State Park.	Class I	1. Recommended Improvements to existing roadways 2. Trip Demand Management (TDM) Program	~~T-1. Implement measures identified in the Estero Area Plan Update for Los Osos~~ ~~T-2. Implement measures identified in the Estero Area Plan Update for the Rural Estero~~	Class I
Impact TC-2: Increases in traffic on Cayucos roadways resulting from buildout are less than significant.	Class III	None	None required	Class III
Impact TC-3: Increases in Traffic on Los Osos Roadways and Impacts to Intersections Resulting from Buildout.	Class I/II	1. Recommended Improvements to existing roadways 2. Trip-reducing measures 3. Recommended Improvements to existing intersections	T-2: Implement measures identified in the Estero Area Plan Update for Los Osos	Class I (Class III intersections and some roadway segments)
Impact TC-4: Emergency evacuation routes serving the planning area could be congested during the PM Peak Hour.	Class I	1. Recommended Improvements to existing roadways	None	Class I
Impact TC-5: Consistency with Section 30252 of the Coastal Act.	Class III	None	None required	Class III

Table 2-1. Summary of Impacts and Mitigation				
Impacts	**Significance**	**Area Plan Policies and Standards**	**Mitigation**	**Residual Impact**
5.2 Air Quality				
Impact AQ-1: Consistency with the Clean Air Plan	Class III	1. Promote infill 2. Trip-reducing measures 3. Efficient circulation system	None required.	Class III
5.3 Noise				
Impact N-1: Potential adverse but mitigable impact to existing and planned noise-sensitive land uses in the Estero planning area from roadways.	Class II	1. Limiting the types and range of land uses 2. Minimize vehicular travel 3. Prevent further urban development 4. Promote pedestrian travel and activities	General Measures N-1 through N-10: (Short Term - Equipment maintenance, dirt-hauling route orientation, vehicle staging area siting, portable noise barriers. Long Term - Acoustical shielding, loading dock time restrictions, commercial and industrial facility design. Interior noise mitigation packages.)	Class III
Impact N-2: Increased traffic volumes in the Rural Estero Area associated with buildout under the proposed Estero Area Plan will increase ~~in~~ noise ~~levels~~ exposure to planned and existing noise sensitive land uses. This impact is considered adverse but less than significant.	Class III	None	General Measures N-1 through N-10 (see above)	Class III
Impact N-3: Buildout ~~as delineated in~~ under the proposed Estero Area Plan would increase traffic noise levels in the Cayucos Area.; This impact is considered adverse but ~~creating~~ less than significant ~~impacts to existing and planned noise-sensitive land uses~~.	Class III	None	N-11: Site-specific acoustical analysis shall be performed for proposed development on the 10-acre parcel at the northern end of Cayucos. General Measures N-1 through N-10 above.	Class III
Impact N-4: Buildout as delineated in the proposed Estero Area Plan would expose existing and future noise-sensitive land uses in the Los Osos Area to increased levels of noise. This impact is considered adverse but less than significant.	Class III	None	General Measures N-1 through N-10 above	Class III

Table 2-1. Summary of Impacts and Mitigation				
Impacts	**Significance**	**Area Plan Policies and Standards**	**Mitigation**	**Residual Impact**
5.4 Water Resources				
Impact WR-1: Implementation of the Estero Area Plan would increase water demands in the planning area because of increases in residential, commercial and industrial land uses. According to available information, water resources may ~~are~~ not be sufficient in the communities of Los Osos or Cayucos to meet future demand, and full development under the plan would create a significant impact to water resources in those areas.	Refer to Impacts WR-3 through WR-6, below	1. Groundwater Basin Integrity Policy 2. Resource Management System Program 3. Development Within Resource Capacity Policy 4. Wastewater recycling	None required	Refer to Impacts WR-3 through WR-6, below
Impact WR-2: Implementation of the proposed Estero Area Plan could result in potential decreases in groundwater recharge capabilities.	Class II (Refer to Impact DWQ-1, below)	1. New development shall be designed to minimize the amount of impervious surfaces. 2. In suitable recharge areas, site design and layout shall retain runoff on-site to the extent feasible to maximize groundwater recharge and to maintain in stream flows and riparian habitats	None required	Class III
Impact WR-3: Potential less than significant impacts on water supplies in the Chorro and Morro Creek Basins from buildout.	Class I	1. Protect groundwater supplies for agriculture 2. Water Management Program 3. Project Referral Area Policy 4. Project Specific Environmental Review Standard	None	Class I
Impact WR-4: Under the most realistic estimate of future water demand in Cayucos, buildout ~~will outstrip~~ may exceed currently available supplies. Nacimiento Project water would reduce impacts to less than significant levels, however, future availability of such water is considered speculative.	Class I	1. Secure Supplemental Water Policy 2. Water Conservation Program utilizing public education, leak detection, landscape conversion, and various retrofit programs 3. Consolidation of Water Purveyors 4. Graywater Recycling	None	Class I

Table 2-1. Summary of Impacts and Mitigation				
Impacts	**Significance**	**Area Plan Policies and Standards**	**Mitigation**	**Residual Impact**
Impact WR-5: Implementation of the Estero Area Plan policies will result in potentially significant impacts to water supplies in the Los Osos basin.	Class I	1. General plan amendments only allowed if maintain or decrease net water use. 2. The proposed transfer of development potential shall not adversely affect the capacity of the community sewer system and shall not exceed the safe yield of the groundwater basin 3. New development will not be permitted unless it can be accommodated by the sustainable yield of the Los Osos groundwater basin without seawater intrusion 4. Water Management Standard 5. Urban Service Line Expansion 6. On-site Wastewater Disposal Standard	None	Class I
Impact WR-6: Implementation of the Estero Area Plan could decrease groundwater infiltration ~~in~~ and recharge of the Los Osos Basin. This impact is considered adverse but less than significant ~~because of standards incorporated into the proposed Area Plan~~.	Class II (Refer to Impact DWQ-1, below)	Refer to Area Plan Policies and Standards for Impact DWQ-1, below	None required	Class III
Impact WR-7: Consistency with Sections 30231, 30241(e), 30250(a), 30254, and 30255 of the Coastal Act.	Class III	Coastal Plan Policies Document, Policy 8	No additional	Class III

Table 2-1. Summary of Impacts and Mitigation				
Impacts	**Significance**	**Area Plan Policies and Standards**	**Mitigation**	**Residual Impact**
5.5 Wastewater				
Impact WW-1: ~~Implementation~~ Buildout of the proposed Estero Area Plan would increase the wastewater generation within the Estero planning area.	Refer to Impacts WW-2 and WW-3, below	~~None~~ **Policy I.B.1: Development within Resource Capacities.** Adequate public or private resource capacities shall be available to serve proposed development. Within urban areas, adequate water supply and sewage disposal capacities shall be available to serve both existing and potential development within the community before approval of new land divisions using those services. **Policy III.B: Sewage Disposal.** Monitor sewage flows through the Resource Management System to assure that new development can be accommodated by sewage disposal capacities **Program III.B.1: Wastewater Recycling.** Sewage disposal agencies should work with the County Public Works and Health Departments and the Regional Water Quality Control Board to develop a program to find alternative uses for treated wastewater, such as irrigation (e.g. on agricultural lands and the Morro Bay Golf Course), groundwater recharge, and environmental enhancement.	None required	Refer to Impacts WW-2 and WW-3, below

Table 2-1. Summary of Impacts and Mitigation				
Impacts	**Significance**	**Area Plan Policies and Standards**	**Mitigation**	**Residual Impact**
Impact WW-2: Increase in wastewater flows in portions of the Rural Estero area will have less than significant impacts on treatment facilities.	Class III	~~None~~ **Program III.A.7: Agricultural Water Supplies.** Maintain the quantity and quality of ground water resources currently consumed by production agriculture. Where sources of adequate wastewater quality are available, develop a program with appropriate agencies to use treated wastewater for irrigation.	None required	Class III
Impact WW-3: Buildout under the proposed Estero Area Plan would result in an increase in wastewater flow from the Cayucos area to the Morro Bay treatment plant.	Class III	~~None~~ **Program III.A.6: Graywater Recycling.** The county should work with the public to encourage development and use of large-scale graywater recycling projects for irrigation in new development.	None required	Class III
Impact WW-4: Water quality from wastewater generation in the Los Osos Area should improve ~~provided~~ when a community wastewater system is constructed. This is considered a beneficial impact.	Class IV	1. Proposed policy that wastewater systems shall not adversely affect groundwater quality.	None required	Class IV
Impact WW-5: Consistency with Coastal Act Sections 30231, 30250, 30254, and 30255.	Class III	None	None required	Class III
5.6 Drainage and Water Quality				
Impact DWQ-1: Changes in land use category designations may impact runoff patterns and volumes.	Class II	1. New development shall be designed to minimize the amount of impervious surfaces	DWQ-1: Consistency with Applicable Drainage-Related Plans. All new development in or near existing drainage systems and associated tributaries	Class III

Table 2-1. Summary of Impacts and Mitigation				
Impacts	**Significance**	**Area Plan Policies and Standards**	**Mitigation**	**Residual Impact**
		2. Drainage facility designs in new land divisions and other development subject to discretionary review shall maximize groundwater recharge through on-site or community-wide stormwater infiltration measures. Recharge basins shall be designed to be available for recreational use 3. Runoff from roads and development shall not adversely affect sensitive habitat, groundwater resources, and downstream areas 4. Flood -prone natural drainage courses should be maintained in their natural state to protect native vegetation and wildlife habitats. 5. County Engineering and Environmental Health Department should work with the community, property owners, water purveyors, and RWQCB to development and implement a water management program for the Los Osos groundwater basin. 6. Natural drainage courses shall be maintained to the extent feasible or restored to the closest approximation of natural conditions. New development near channels shall be subject to prescribed setbacks. 7. New development shall be subject to certain constraints related to properties of soil and bedrock and	shall be consistent with applicable existing drainage, grading, erosion control, and water quality-related policies, standards, and programs to the extent feasible including but not limited to the following: • San Luis Obispo County Coastal Zone Land Use Ordinance including Section 23.05.020 et. seq., Section 23.050.040 et. seq., Section 23.05.030 et. seq., Section 23.07.060 et. seq., and Section 23.06.100; • Water Quality Control Plan - Central Coast Basin including Best Management Practices (BMPs) DWQ-2: Pollution Stormwater Grease Traps. New development shall implement measures to eliminate pollutants from storm runoff prior to its drainage offsite. Such measures include grease traps in association with sedimentation detention basins. Grease traps should be sized so that at least the first inch from any one storm is retained on the project site to percolate and/or evaporate. Smaller developments (individual houses, home additions) may be exempt at the discretion of County Engineering. The reader should note that the above measure is typically required as part of stormwater plan approvals for specific projects. **DWQ-3:** CZLUO Amendment. If the current draft CZLUO amendment package is not adopted, the proposed Area Plan shall be amended to include equal or better drainage and water quality protection measures.	

Table 2-1. Summary of Impacts and Mitigation				
Impacts	**Significance**	**Area Plan Policies and Standards**	**Mitigation**	**Residual Impact**
		slopes in certain areas addressed by the plan.		
Impact DWQ-2: Potential temporary sediment erosion from construction activity spoils.	Class II	1. Cayucos Drainage Plan Program 2. Los Osos Drainage Plan Program 3. Drainage to Morro Bay Program	See DWQ-1 and DWQ-2 above.	Class III
Impact DWQ-3: Potential short-term increases in turbidity and sedimentation from construction activities.	Class II	Refer to Area Plan Policies and Standards listed for Impacts DWQ-1 and DWQ-2, above.	See DWQ-1 and DWQ-2 above.	Class III
Impact DWQ-4: Potential degradation of stormwater runoff and creek system water quality because of urban uses.	Class II	Refer to Area Plan Policies and Standards listed for Impacts DWQ-1 and DWQ-2, above.	See DWQ-1 and DWQ-2 above.	Class III
Impact DWQ-5: Potential degradation of groundwater quality	Class II	Refer to Area Plan Policies and Standards listed for Impacts DWQ-1 and DWQ-2, above.	See DWQ-1 and DWQ-2 above.	Class III
Impact DWQ-5: Coastal Act Consistency	Class III	None	DWQ-3: CZLUO Amendment. If the current draft CZLUO amendment package is not adopted, the proposed Area Plan shall be amended to include equal or better drainage and water quality protection measures.	Class III
5.7 Public Services				
Impact PS-1: Potential increase in student enrollment resulting in unmet demands for schools.	Class II	1. Qualitative improvements are planned for the high schools within the district using Measure "A" bond revenue. 2. The CESD is in the process of identifying a suitable 10-20 acre site for construction of a new school to alleviate school capacity issues for Cayucos Elementary School.	None required	Class III

Table 2-1. Summary of Impacts and Mitigation				
Impacts	**Significance**	**Area Plan Policies and Standards**	**Mitigation**	**Residual Impact**
		3. Joint Educational Facility study by San Luis County and SLCUD to assess feasibility of High School in Los Osos.		
Impact PS-2, 5, 10, 16: Potential increase in demand for fire protection from local fire districts.	Class II	None	PS-1: County shall evaluate the need for an additional fire station in the Estero Area by 2016	Class III
Impact PS-3, 6, 11, 17: Potential increase in demand for police protection from local law enforcement agencies.	Class III	None	None required	Class III
Impact PS-4, 7, 12, 18: Potential increase in solid waste generation and disposal at existing landfills.	Class III	1. Implementation of the County Integrated Waste Management Plan 2. Implementation of the actions recommended in the Source Reduction and Recycling Element for the unincorporated areas of San Luis Obispo County	None required	Class III
Impact PS-8, 13: Need for Additional Park Acreage	Class III	1. Promote development of recreational and visitor-serving uses, consistent with protection of agriculture and sensitive resources. 2. Locate new intensive recreational facilities and major visitor-serving commercial development within or immediately adjacent to urban areas on site that do not contain prime agricultural land or significant sensitive habitat. 3. Limit uses [in the Recreation Category] to open space, recreation and visitor-serving related uses. 4. Pursue improved coastal access and amenities south of Cayucos,	None required	Class III

Table 2-1. Summary of Impacts and Mitigation				
Impacts	**Significance**	**Area Plan Policies and Standards**	**Mitigation**	**Residual Impact**
		such as a bicycle and pedestrian path connection between Cayucos and the City of Morro Bay.		
Impact PS-9, 15: Potential Increase in Student Enrollment Resulting in Unmet Demands for Schools.	Class II	See Impact PS-1, above.	None required	Class III
Impact PS-14, 20: Potential Need for Expanded Library Space	Class III	1. Cayucos Community Center Program would include expansion of Veterans Memorial Building for a substantially expanded library 2. Los Osos Library expansion project	None required	Class III
Impact PS-19: Need for Expanded Recreational Space	Class III	1. Policy to develop at least 118 acres of neighborhood and community parks and recreation facilities	~~None required~~ **PS-2:** Add the following policy: "Monitor parks for degradation of natural resources, facilities, and other features throughout the implementation of the Estero Area Plan."	Class III
5.8 Biology				
Impact BR-1: Increasing urbanization within the Estero Planning area may result in direct or indirect impacts to sensitive species or their habitat.	Class I	1. Protect contiguous areas of sensitive habitats (in SRA or not). 2. Concentrate or cluster development on the least environmentally sensitive portions of the site in order to protect and sustain ecologically significant areas 3. Provide contiguous open space areas that connect, where feasible, to adjacent open space when clustering	BR-1 Implement Sedimentation Reduction Measures. BR-2 Tree Replacement. Riparian BR-3 Plant/Animal Survey Procedures BR-4 Construction Activity Timing BR-5 Prepare and Submit a Revegetation Plan. BR-6 Implement the Pre-Approved Revegetation Plan BR-7 Control Further Introduction of Invasive Exotic Plants at New Development Sites.	Class I

Table 2-1. Summary of Impacts and Mitigation				
Impacts	**Significance**	**Area Plan Policies and Standards**	**Mitigation**	**Residual Impact**
		or concentrating development to protect the above resources 4. Development shall comply with the minimum setbacks from environmentally sensitive habitats that are required in the Estero Area Plan and the CZLUO. 5. Make every effort to secure permanent protection and management of the county's significant marine resources using programs and legislation such as the national estuary, state and national marine sanctuary program, and other methods 6. Continue to obtain open space easements for sensitive wetlands and bayfront areas, and encourage other agencies and conservation organizations to obtain open space and conservation easements and fee title to these areas.	BR-8 Avoid Disturbance of Special-Status Plants at New Development Sites. BR-9 Implement Erosion and Spill Control Measures During Construction. BR-10 The County shall develop and revise current landscaping plan guidelines to include prohibition of the planting of invasive exotics designated by CNPS	
Impact BR-2: Increasing urbanization within the Estero planning area may adversely impact riparian habitat, wetlands, and other waters of the United States, by increasing impervious surfaces, accelerating erosion and input of sediment and pollutants to aquatic habitats occupied by sensitive species.	Class II	1. Development shall be designed to minimize the amount of impervious surface. 2. Runoff from roads and development shall not adversely affect sensitive habitat, groundwater resources, and downstream areas. 3. Flood-prone natural drainage courses should be maintained in their natural state to protect native vegetation and wildlife habitats. 4. The design of drainage facilities in new land division and other	BR-1 through BR-10, plus: BR-11: Eliminate Proposed Density Increases in Areas of Endangered Species Habitat.	Class III

Table 2-1. Summary of Impacts and Mitigation				
Impacts	**Significance**	**Area Plan Policies and Standards**	**Mitigation**	**Residual Impact**
		development subject to discretionary review shall maximize groundwater recharge through in-site or community-wide stormwater infiltration measures. 5. Encourage agriculturalists and other landowners to participate in education and assistance programs and other voluntary and cooperative programs that encourage sustainable land management practice that reduce erosion, sedimentation and nutrient levels in the watershed. 6. Slow the process of bay sedimentation. 7. The County Public Works Department should identify opportunities to reduce runoff, sedimentation and the volume and concentration of pollutants entering surface waters from county bridges and paved and unpaved roads.		
		8. The county should install and maintain sediment traps where appropriate in order to reduce sediment transport to coastal waters. The county should develop and implement other Best Management Practices to reduce sedimentation that can be used according to varying conditions and needs. 9. Los Osos Drainage Plan. The Los Osos Community Services District, the County Public Works		

Table 2-1. Summary of Impacts and Mitigation				
Impacts	**Significance**	**Area Plan Policies and Standards**	**Mitigation**	**Residual Impact**
		Department and/or the County Flood Control and Water Conservation District should prepare a master drainage plan for Los Osos and vicinity 10. Reduce the sediment load in surface drainage from the Los Osos street system into Morro Bay 11. Where streambank erosion is a concern, the county should implement creek restoration projects and other management measures to improve streambank morphology and stability, enhance riparian habitat and improve water quality. 12. Maintain, and where feasible, restore the quality and biological productivity of coastal waters, streams, wetlands, estuaries, and lakes in order to protect human health and maintain optimum populations of marine and other wildlife.		
Impact BR-3: Increased development in the Estero Area may adversely impact wildlife corridors through direct or indirect means.	Class II	1. Refer to policies and standards mentioned for BR-1, BR-2 above.	Refer to General Mitigation measures BR-1 through BR-11 above	Class III
Impact BR-4: Implementation of the proposed Estero Area Plan would not conflict with local policies or ordinances protecting biological resources.	Class III	1. Refer to policies and standards mentioned for BR-1, BR-2 above.	None Required	Class III
Impact BR-5: The proposed Estero Area Plan would not conflict with any adopted habitat conservation plans.	Class III	1. Refer to policies and standards mentioned for BR-1, BR-2 above 2. Use an ecosystem approach	None required	Class III

Table 2-1. Summary of Impacts and Mitigation				
Impacts	**Significance**	**Area Plan Policies and Standards**	**Mitigation**	**Residual Impact**
		whenever possible to preserve viable areas of sensitive habitat. 3. Implement a community-based transfer of development credits program, and concentrating or clustering development to protect sensitive species and contiguous areas of habitat 4. Mitigate impacts to sensitive habitat on the site of development so that contiguous areas of environmentally valuable habitat are preserved or restored. 5. Acquire land or purchasing development credits. 6. Limit the spread of urban development 7. Develop a Habitat Conservation Plan (HCP) or Natural Community Conservation Planning (NCCP) program that preserves sensitive habitat using an ecosystem approach, while easing the regulatory burden on private landowners. 8. .Develop an areawide strategy to monitor development activity as it affects habitat. 9. Implement the recovery plan developed by the USFWS for the Morro shoulderband snail, Morro manzanita, and Indian Knob mountainbalm.		

Table 2-1. Summary of Impacts and Mitigation				
Impacts	**Significance**	**Area Plan Policies and Standards**	**Mitigation**	**Residual Impact**
5.9 Agriculture				
Impact AG-1: Changes in land uses proposed by the Estero Area Plan will result in the permanent conversion of 38 acres of agricultural land to a non-agricultural use.	Class III	1. Maintain and protect agriculture, through the use of incentives and the continuance of land use designations. 2. Prevent further urban or suburban development, especially in areas of small rural lots. 3. Avoid "leapfrog" development. 4. Protect groundwater supplies for agriculture. 5. Supports the creation of a greenbelt around the community of Los Osos as a way to prevent sprawl onto the productive agricultural lands to the east. 6. Support the development of a consensus-based plan which preserves scenic vistas as well as agriculture around the Morros. 7. Supports continued agricultural use, retaining larger parcels for cropland and grazing uses while allowing plant and animal specialties on smaller parcels in the Rural Area. 8. Protect agriculture, open space and sensitive resources on the coastal terraces to the north and south of Cayucos. 9. Participation in a transfer of development credits (TDC) program and support formation of open space district	None required	Class III

Table 2-1. Summary of Impacts and Mitigation				
Impacts	**Significance**	**Area Plan Policies and Standards**	**Mitigation**	**Residual Impact**
5.10 Visual Resources				
Impact AES-1: Potential visual quality impact from development under the Area Plan update, which would result in additional development in the planning area.	Refer to Impacts AES-2 through 7, below	1. Sensitive Resource Area designation (SRA): • The Morros, Including Cerro Cabrillo, Hollister Peak and Associated Hills (SRA) • Highway 1 - Cayucos Viewshed ~~(SRA)~~ Critical Viewshed. • Ocean Shoreline (SRA). • Morro Bay Shoreline (SRA). • Other SRAs that serve to protect visual values in the area: Morro Bay Estuary, Hazard Canyon, Coon Creek, Los Osos Oaks State Reserve, Los Osos Creek, Eto and Warden Lakes, Whale Rock Reservoir Watershed.	~~None~~ **Mitigation Measure AES-1:** General measures to reduce visual impacts are largely addressed in the CZLUO and the proposed Estero Area Plan. If the proposed CZLUO amendments are not adopted, an amendment to the Estero Area Plan Update would be necessary. The amendment shall include protection measures equivalent to or better than those proposed in the CZLUO amendments.	Refer to Impacts AES-2 through 7, below
Impact AES-2: Potential visual quality impact from development of land following a change in ~~use~~ designation ~~change~~ from agriculture to residential multi-family.	Class III	1. Hillside Areas GSA. Many of the hillsides in the planning area are subject to high landslide risk, as identified in the Safety Element of the general plan. Of particular note are the hillsides above Morro Bay and Cayucos	None	Class III
Impact AES-3:Potential visual quality impact from development of land following a change in ~~use~~ designation ~~change~~ from Recreation to Residential Multi-Family/Commercial Retail.	Class III	1. Combining Designations. Flood Hazard (FH) policies pertaining to Los Osos, Chorro, Morro, Toro, Willow, Old, Cayucos, Little Cayucos, and Villa Creeks and Tributaries (FH). These flood-prone natural drainage courses should be maintained in their natural state to protect native vegetation and	None	Class III

Table 2-1. Summary of Impacts and Mitigation				
Impacts	**Significance**	**Area Plan Policies and Standards**	**Mitigation**	**Residual Impact**
		wildlife habitats. Flood hazard areas in Cayucos should be used for recreation where feasible		
Impact AES-4: Potential visual quality impact associated with development in areas along the Los Osos Creek corridor .	Class I	1. The plan for this area also encourages permanently protecting, sustaining, and managing agriculture and sensitive habitats through a variety of measures. These include establishing TDC sending sites for parcels adjacent to the creek inside and outside the urban reserve line, streamlining development review for projects that protect habitats through conservation easements, and offering a potential minor density increase for new land divisions that include conservation easements.	No mitigation available	Class I
Impact AES-5: Potential visual quality impact associated with development in vacant parcels west of Pecho Road.	Class I	1. Densities and standards in this area are adjusted to make development more environmentally sensitive, primarily by shifting development potential to less environmentally and visually sensitive locations. 2. TDC sender sites are proposed to transfer potential development away from the western portion nearest the sandspit. 3. Standards for the Recreation category have been revised to increase the allowable number of lodging units, limit the area of site disturbance to ~~ten~~ eight acres, and	No mitigation available	Class I

Table 2-1. Summary of Impacts and Mitigation				
Impacts	**Significance**	**Area Plan Policies and Standards**	**Mitigation**	**Residual Impact**
		preclude residential development.		
Impact AES-6: Potential visual quality impact associated with development in Morro Shores.	Class I	This 75.5-acre area, referred to as the Morro Shores mixed use area, in the central part of Los Osos. A specific plan is required for much of this mixed use area, which is proposed to be designated RSF, RMF, CS, CR over the entire site. The multi-use business parks are intended for non-polluting light manufacturing/assembly uses (particularly research and development, and high technology). The business parks would be campus-like and compatible with surrounding residential neighborhoods, and have a recreation area for use by employees. The specific plan may include medium and medium-to-high density residential development, with a density bonus provided for senior citizen housing. The specific plan may include other uses as well: neighborhood commercial/residential mixed use, a community services center, low density residential, and wastewater treatment ponds/park/recreational space as part of a community sewer system.	No mitigation available	Class I

Table 2-1. Summary of Impacts and Mitigation				
Impacts	**Significance**	**Area Plan Policies and Standards**	**Mitigation**	**Residual Impact**
5.11 Geologic Conditions				
Impact GEO-1: Significant impacts could occur because of the increased likelihood of soil erosion associated with development as described in the Estero Area Plan.	Class II	1. Hillside Areas GSA. This GSA is located on hillsides subject to high landslide risk, and covers many of the hillsides above Morro Bay and Cayucos. 2. Bluff Erosion GSA. This GSA is located along portions of the coastline where bluff erosion is a concern. Development should generally be located to withstand 75 years of bluff erosion without the need for a shoreline protection structure that would substantially alter the landform, affect public access, or impact sand movement. 3. Cayucos and Los Osos Liquefaction GSA. The Los Osos urban area and portions of the Cayucos urban area along creeks, some bluffs and the shoreline are subject to a high potential for liquefaction, as identified in the Safety Element of the general plan. 4. The Estero Area Plan also includes proposed standards for hillside development and erosion minimization, including requirements restricting runoff from impervious surfaces, and maximizing stormwater infiltration.	None	Class III

Table 2-1. Summary of Impacts and Mitigation				
Impacts	**Significance**	**Area Plan Policies and Standards**	**Mitigation**	**Residual Impact**
Impact GEO-2: Significant impacts could occur on local soils because of the increased likelihood of landslides associated with development as described in the Estero Area Plan.	Class II	See policies and standards for Impact GEO-1, above	None	Class III
Impact GEO-3: Increased exposure of persons and property to seismic events associated with the Estero Area Plan would constitute a less than significant impact.	Class III	None	None	Class III
Impact GEO-4: Increased exposure of persons and property to potential ground rupture events associated with the Estero Area Plan would constitute a less than significant impact.	Class III	None	None	Class III
Impact GEO-5: Impacts associated with implementation of the Estero Area Plan regarding landslides are less than significant.	Class III	None	None	Class III
Impact GEO-6: The overall potential for tsunamis and seiches is considered remote, thus impacts (with the exception of Cayucos) are not significant.	Refer to Impact GEO-9, below	None	None	Refer to Impact GEO-9, below
Impact GEO-7: Impacts associated with seismicity in the Rural Area would be considered less than significant under buildout as proposed in the Estero Area Plan.	Class III	None	None	Class III
Impact GEO-8: Development of residences on the Cayucos hillsides has a high likelihood of experiencing significant impacts from landslides.	Class III	Hillsides GSA	None	Class III

Table 2-1. Summary of Impacts and Mitigation				
Impacts	**Significance**	**Area Plan Policies and Standards**	**Mitigation**	**Residual Impact**
Impact GEO-9: Additional development on the immediate coastline could result in a less than significant impacts from tsunami damage.	Class III	None	None	Class III
Impact GEO-10: Potentially Significant Impacts on Development in the Vicinity of the Los Osos Fault.	Class II	1. Geologic Study Area (GSA) combining designation that would encompass land within 1000 feet of the Los Osos Fault was recommended. 2. The CZLUO requires preparation of a report on geologic hazards and appropriate mitigation measures. Structures must be designed to overcome these hazards	None	Class III
Impact GEO-11: Potentially significant impacts to development from liquefaction in the vicinity of the Los Osos Fault.	Class II	1. Geologic Study Area (GSA) combining designation. As the potential for liquefaction exists in the area, development projects within the Study Area included as mitigation would be required to complete a site specific geotechnical report to assess the potential for liquefaction onsite and recommend measures to reduce any potential impacts.	None	Class III

Table 2-1. Summary of Impacts and Mitigation				
Impacts	**Significance**	**Area Plan Policies and Standards**	**Mitigation**	**Residual Impact**
Impact GEO-12: Buildout as described in the Estero Area Plan could result in subsidence associated with the Los Osos Basin, a potentially significant impact.	Class II	1. Implementation of state and local regulations regarding ground shaking 2. Development requirements for low-density rural development and building code adherence 3. Nearly the entire study area is included in the GSA combining designation due to the potential landslide hazard, and is subject to the GSA standards for development in the CZLUO	None	Class III
5.12 Cultural Resources				
Impact CR-1: Disturbance of Prehistoric Resources in the Archaeologically Sensitive Areas of the Estero Planning Area.	Class II	1. Combining designations- Special overlay categories applied in areas of the county with hazardous conditions or special resources (e.g., Historic Site (H) for Canet Adobe, Spooner Residence, Los Osos Schoolhouse, Captain James Cass House, and Cayucos Pier). 2. Refer to Section 5.12.1.2(a)(1) of this EIR for a discussion of the draft standards and policies related to combining designations proposed for addition to the CZLUO. The CZLUO amendment is proceeding concurrent with, but separate from, the Estero Area Plan Update; therefore, the policies and standards cannot be considered mitigation in this EIR.	CR-1: The Environmental Division should employ a presumption that all project sites within the planning area are sensitive unless site features would indicate otherwise. The reader should note that the following represents the current practice of the County in determining archaeological sensitivity for specific projects. Continue to utilize procedures employed by the Environmental Division for protection of archaeological resources as described above. These can be summarized as follows: 1. Review discretionary permits on a case-by-case basis 2. Projects in the Estero planning area that appear to have characteristics indicative of Native American use are required to complete a Phase I surface survey 3. If archaeological resources are found, mitigation is required. Subsurface investigation may be necessary to determine	Class III

Table 2-1. Summary of Impacts and Mitigation				
Impacts	**Significance**	**Area Plan Policies and Standards**	**Mitigation**	**Residual Impact**
			the site's extent and/or significance. 4. Because of the sensitivity of resources in the Estero planning area, all development activities that require ground disturbance (no matter what type of activity) should be carefully reviewed by the Environmental Division for the possibility of archaeological resources. CR-2. All archaeological (and, when appropriate, historical) information should be maintained in a secure and confidential manner to minimize the potential for improper investigations and vandalism of cultural resources. CR-3. If the proposed amendments to the CZLUO are not approved, a functional equivalent of such language shall be incorporated into the Estero Area Plan.	
Impact CR-2: Disturbance of Unknown Resources on Unsurveyed Portions of the Estero Planning Area.	Class II	See policies and standards for Impact CR-1, above	See mitigation measures CR-1, CR-2, and CR-3, above	Class III
Impact CR-3: Disturbance of Known and Unknown Historic Resources in the Estero Planning Area.	Class II	See policies and standards for Impact CR-1, above	See mitigation measures CR-1, CR-2, and CR-3, above	Class III
Impact CR-4: Damage or Destruction of Known or Unknown Archaeological Sites Resulting from Indirect Effects.	Class I	See policies and standards for Impact CR-1, above	See mitigation measures CR-1, CR-2, and CR-3, above	Class I
Impact CR-5: Consistency with Coastal Zone Policies Protecting Archaeological and Historic Resources.	Class II	See policies and standards for Impact CR-1, above	See mitigation measures CR-1, CR-2, and CR-3, above	Class III

3.0 Project Description

The Estero Area Plan (Area Plan) constitutes the Land Use Element and Circulation Element of the County General Plan for the Estero planning area. The proposed project is a comprehensive update to the existing Area Plan offered by the County of San Luis Obispo. The Area Plan is the official statement of the County that sets forth policies, programs, and standards that will guide the future development of the area.

This section discusses the project background, location, and existing conditions for the proposed project. It presents the proposed project conditions, combining designations and planning area standards. The project description also discusses buildout calculations.

3.1 Project Background

In 1980, the County of San Luis Obispo adopted its present land use documents, known as the Land Use Ordinance (LUO) and the Land Use Element (LUE) of the General Plan. The LUE includes 15 Area Plans (11 inland, 4 coastal) that describe land use and circulation policies for distinct geographic regions of the county, including the Estero planning area. Periodic updates to each of the county's area plans are required under the LUE. The Estero Area Plan is part of the Local Coastal Program, which includes a land use plan and Coastal Zone Land Use Ordinance (CZLUO).

Since its preparation in the early '80s and adoption in 1988, the existing Estero Area Plan has been amended, but has not undergone a comprehensive update. This update was prepared by the San Luis Obispo County Department of Planning and Building and includes a number of text and map changes that respond to changes in conditions and community sentiment that have occurred since 1988 and earlier.

3.2 Project Location

The proposed project is located along the coastline in central San Luis Obispo County. The Estero planning area, secondary study areas, and the City of Morro Bay are described below in relation to the proposed project location.

3.2.1 Estero Planning Area

The Estero planning area occupies approximately 71.5 square miles of land along the coastline in central San Luis Obispo County. The planning area extends from Point Estero on the north to Point Buchon on the south, and extends up to seven miles inland. The planning area is defined by the coastal zone boundary established by the state of California in 1976 (See Figures 3-1 and 3-2). The Estero planning area is comprised of the City of Morro Bay, an incorporated city, two unincorporated communities, Los Osos and Cayucos, and surrounding unincorporated rural areas.

"Rural Estero" includes all land not within urban reserve lines of Cayucos, Los Osos or the City of Morro Bay. Rural Estero includes several outstanding natural features including the Morro Bay Estuary, the Morros (a chain of volcanic peaks), and the Montaña de Oro and Morro Bay State Parks and Beaches. Approximately 75 percent of the land in the planning area is zoned for agricultural uses such as row crop farming and grazing.

3.2.2 Secondary Study Areas

Secondary study areas were studied in connection with the update because of their various relationships, natural and otherwise, to the Estero planning area. The two secondary study areas considered include the upper areas of the Morro Bay watershed ("Other Watershed") and the "Cayucos Fringe". The Other Watershed extends

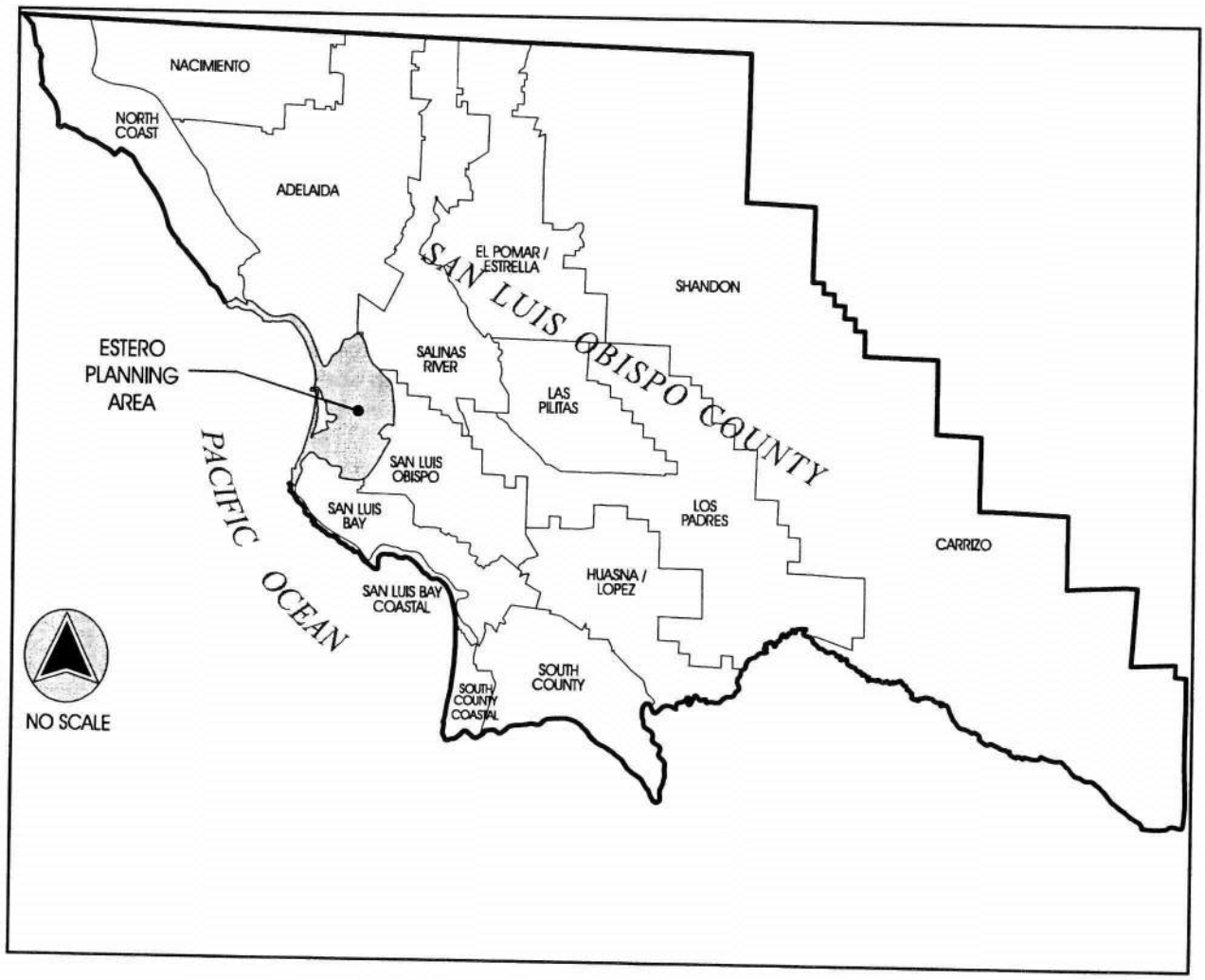


Figure 3-1. Location of Estero Planning Area.

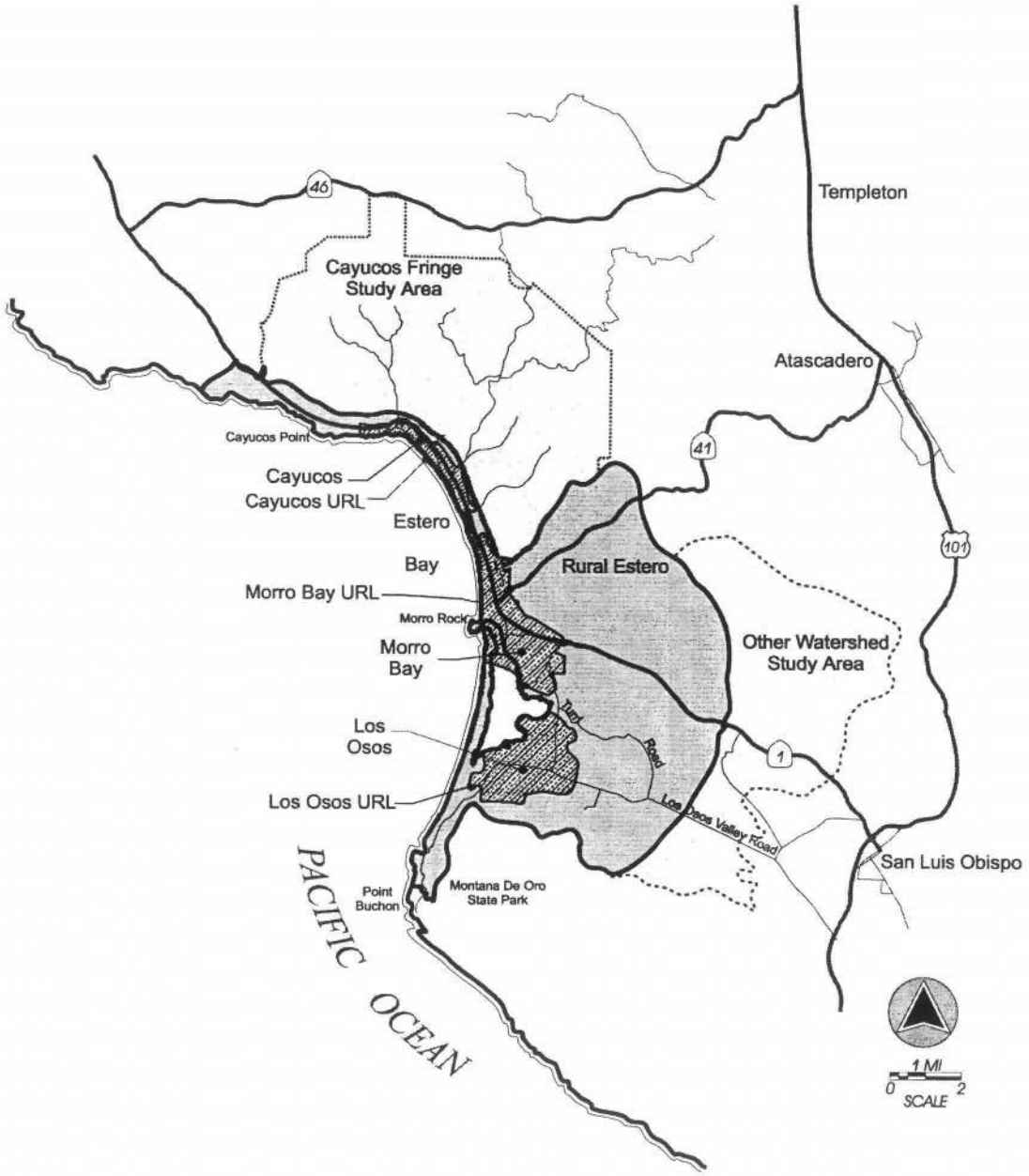


Figure 3-2 Estero Planning Area and Secondary Study Areas.

beyond the Estero planning area into portions of the Salinas River, San Luis Obispo, and San Luis Bay planning areas. The upper portions of the watershed extend into the Los Osos and Chorro Valleys and to Cuesta Ridge (See Figure 3-2). The Cayucos Fringe is located within the Adelaida planning area.

The upper portions of the Morro Bay watershed outside of the Estero planning area total about 17,000 acres (approximately 27 square miles). Land use and development activity in the upper portions of the watershed have a great effect on downstream areas within the Estero planning area and ultimately on the Morro Bay estuary. These downstream effects involve water supply, erosion, pollution and habitat, for example. Accordingly, land use planning and decisions need to consider the effects of activities in the Other Watershed on the rest of the watershed and on the Morro Bay estuary.

In recognition of the watershed as a single, inter-related system, the update of the Estero Area Plan has taken into consideration the entire Morro Bay watershed (Other Watershed Area). Land uses and environmental constraints in this secondary study area were studied in connection with the goals, policies, standards, and programs of the Estero Area Plan.

The Cayucos Fringe area covers approximately 34,000 acres, nearly 53 square miles (See Figure 3-2). The Fringe is included as a secondary study area for two reasons. First, the Cayucos Fringe includes most of the watersheds that affect Cayucos, especially Whale Rock Reservoir and its watershed which supplies water to Cayucos. Second, the Cayucos Fringe includes the area served by the Cayucos Elementary School.

Table 3-1: Acres in Study Area Proposed Plan

Sub-Area	Acres
Estero Planning Area	
Rural Estero	39,580
Cayucos	551
Los Osos	3,401
Total	43,532
Secondary Study Areas	
Other Watershed	17,023
Cayucos Fringe	33,824

Sources: *Estero Area Plan Update: Land Use.* August 2003, *Public Hearing Draft,* Table 4-1, Pp. 4-7; *Estero Area Plan Update Cayucos Fringe Land Use Survey, Buildout & Population Projections:* November, 1994

3.2.3 Morro Bay

The City of Morro Bay occupies about seven square miles along the coastline, mid-way between the communities of Los Osos and Cayucos. The city is surrounded by the Estero planning area, but is not directly part of this study. However, county policies will be evaluated for their potential effect on the City.

3.2.4 Acreage

The total Study Area acreage is shown in Table 3-1. Rural Estero encompasses over 39,500 acres. Cayucos includes 551 acres within its urban reserve line, while Los Osos covers 3,401 acres. The total acreage of 43,532 acres shown in Table 3-1 excludes the City of Morro Bay. The combined secondary study areas cover approximately 51,000 acres.

3.3 Existing Conditions

3.3.1 Existing Area Plan

The existing plan for the Estero planning area includes land use and circulation policies, programs, and standards. The area plan allocates land use throughout the planning area by land use categories. These categories, together with applicable planning area standards, determine the varieties of land uses that may be established on a parcel of land and the allowable densities and intensities of such uses. Combining designations are also identified in

the area plan where areas of potential hazards or special resources of concern exist including flood hazards, geologic instability, and environmentally sensitive habitats. The area plan also includes planning area standards that further define allowable uses and development standards for certain areas.

3.3.1.1 Planning Area Boundary

The existing area plan has been amended since its adoption in 1988. Therefore, the distribution of land use categories shown in the existing plan text is no longer accurate. Also, the Estero planning area boundary has changed since the 1988 plan. In 1990, the planning area boundary was divided at the coastal zone boundary, with most of the land outside the boundary placed into the Adelaida and Salinas River Planning Areas. Table 3-2 corrects the existing area plan by incorporating the changes that have occurred since 1988.

3.3.1.2 Existing Land Uses in the Planning Area

There are nearly 42,000 ~~net~~ acres in the Estero planning area. All land in the planning area is assigned to one of thirteen land use categories. The designations and typical allowable land uses are shown in Table 3-3. Table 3-4 shows acreage within each land use category in the Estero planning area.

In the Estero planning area, the Agriculture land use category accounts for 76 percent of the total acreage, while the Recreation category accounts for approximately 13 percent of the total acreage. All four residential categories (Rural, Suburban, Single Family and Multi-Family) combined account for seven percent of the acreage in the planning area. The remaining five percent of the total is divided among six land use categories: Open Space (837 acres), Rural Lands (683 acres), Public Facilities (305 acres), Commercial Retail (87 acres), Office and Professional (33 acres), and Commercial Service (24 acres).

Table 3-2: Estero Planning Area Land Use Category Changes[1], 1988-2003

Land Use Categories	1988 Plan Acres[2]	2003 Land Use Category Acres[2] (Existing Plan)	Net Change[3]
Agriculture	55,214	31,729	(23,485)
Rural Lands	2,729	683	(2,046)
Recreation	8,254	5,395	(2,859)
Open Space	1,700	822	(878)
Residential Rural	72	174	86
Residential Suburban	1,020	1,018	(2)
Residential Single Family	1,239	1,515	277
Residential Multi-Family	177	169	(8)
Office and Professional	34	29	(5)
Commercial Retail	77	79	10
Commercial Service	24	24	0
Industrial	0	0	0
Public Facilities	206	305	99
Commercial Retail, Public Facilities	0	8	8
Office and Professional, Public Facilities	0	3	3
Total	70,746	41,953	(28,800)

Source: *County of San Luis Obispo, Department of Building and Planning,* July 2003.
Notes:
1. Does not include secondary planning areas.
2. Net acreage; does not include road rights-of-ways and beach areas.
3. '03 and '88 figures may not be directly comparable, because '03 acreage for Los Osos and Cayucos was calculated using GIS, and all other acreage was not.

Within the urban boundaries of Los Osos and Cayucos, 86 and 71 percent of the acreage, respectively, are within the residential land use categories. These two communities also include all of the commercial land use categories in the planning area.

Within the commercial and office land use categories, nearly two-thirds (60 percent) of the area consists of Commercial Retail, 17 percent Commercial Service, and 23 percent Office and Professional. No land designated for industrial uses occur within the planning area.

Table 3-3: Allowable Land Uses (not all inclusive)

Land Use Category	Typical Allowable Uses			
Open Space (OS)	Crop Production & Grazing	Passive Recreation	Camping	Coastal Accessways
Public Facilities (PF)	Public Facilities	Offices	Schools	Utility Stations
Industrial (I)	Warehousing	Building Materials	Heavy Manufacturing	Construction Contractors
Commercial Service (CS)	Offices	Business Support	Small-scale Manufacturing	Storage Yards
Commercial Retail (CR)	Restaurants	Food & Beverage	General Merchandise	Furniture
Office & Professional (OP)	Financial Services	Health Care	Offices	Personal Services
Residential, Multi-Family (RMF)	Multi-family units	Passive Recreation	Single-family units	Schools
Residential, Single-Family (RSF)	Single-family units	Mobile Home Parks	Churches	Home Occupations
Residential, Suburban (RS)	Single-family units	Bed & Breakfast Inn	Schools	Churches
Residential, Rural (RR)	Single-family units	Crop Production	Passive Recreation	Bed & Breakfast Inn
Recreation (REC)	Hotels/Motels	Outdoor Sports	RV Parks	Rural Recreation
Rural Lands (RL)	Forestry	Single-family units	Crop Production & Grazing	Mobile Homes
Agriculture, Prime Soils (AG)	Crop Production & Grazing	Nursery Specialties--Soil Dependent	Agricultural Accessory Structures	Water Wells
Agriculture, Non-Prime Soils (AG)	Crop Production & Grazing	Single-family units	Agricultural Accessory Structures	Specialized Animal Facilities

Source: County of San Luis Obispo, *Coastal Zone Framework for Planning, Land Use Categories, Table O; Allowable Land Uses in the Coastal Zone of the County,* 1996.

3.3.1.3 Existing Land Uses in the Secondary Study Areas

The Secondary Study areas lie outside of the Estero planning area. These areas are included in the discussion of the existing area plan because land use and development in these areas adjacent to the Estero planning area may impact and be impacted by the proposed project.

Agriculture is the dominant land use category in both the Cayucos Fringe and the upper areas of the Morro Bay Watershed ("Other Watershed" in Table 3-4). These areas have no land designated for commercial or industrial land uses. Residential uses are allowable in the Agriculture and Rural Lands categories.

Table 3-4: Total Acres in Each Land Use Category[1], Existing Plan

Land Use Categories	Estero Planning Areas				Secondary Study Areas		Total, including Study Areas[6]
	Rural Estero	Cayucos	Los Osos	Total[6]	Cayucos Fringe[5]	Other Watershed[2]	
Agriculture	31,719	10	0	**31,729**	29,609	10,713	**72,051**
Rural Lands	683	0	0	**683**	2,956	752	**4,391**
Recreation	5,206	48	141	**5,395**	128	590	**6,113**
Open Space	653	0	169	**822**	1,131	2,059	**4,012**
Residential Rural	34	0	140	**174**	0	0	**174**
Residential Suburban	91	0	927	**1,018**	0	0	**1,018**
Residential Single Family	0	180	1,335	**1,515**	0	0	**1,515**
Residential Multi-Family	0	59	110	**169**	0	0	**169**
Office and Professional	0	6	23	**29**	0	0	**29**
Commercial Retail	0	17	62	**79**	0	0	**79**
Commercial Service	0	1	23	**24**	0	0	**24**
Industrial	0	0	0	**0**	0	0	**0**
Public Facilities	221	18	66	**305**	0	2,865	**3,170**
Commercial Retail, Public Facilities	0	0	8	**8**	0	0	**8**
Office and Professional, Public Facilities	0	0	3	**3**	0	0	**3**
Total (net) Acres[3]	38,607	339	3,007	**41,953**	33,568	16,979	**92,500**
Total Acres[4]	39,088	551	3,401	**43,040**	33,824	17,023	**93,887**

Source: *Draft Estero Area Plan Update Cayucos Fringe Buildout and Population Projections:* November, 1994, pg. 14.
County of San Luis Obispo, Department of Building and Planning, July 2003.
Notes:
1. This table includes the Estero planning area and other areas of the watershed for Morro Bay and Cayucos Fringe.
2. Other watershed areas include the portions of Adelaida, Salinas River, San Luis Obispo, and San Luis Bay Planning Areas.
3. Net acres reflect areas within individual property ownerships.
4. Total acres are net areas plus areas within road rights of way, and beach areas along the bay or ocean.
5. Total acres for Cayucos Fringe includes 256 acres of road right-of-way.
6. Totals may differ due to rounding partial acres.

3.4 Proposed Project Conditions

Section 3.4.1 presents the proposed Estero Area Plan, lists the general goals of the update, and summarizes some of the major changes from the existing area plan. Sections 3.4.2 and 3.4.3 describe the proposed land use category changes under the proposed Estero Area Plan along with summaries of changes to policies, programs and standards for both the primary and secondary study areas. This section of the report emphasizes changes in land use categories and changes in policies, programs and standards. Additional combining designations and planning area standards are discussed in Sections 3.5 and 3.6, "Combining Designations" and "Buildout under the Proposed Area Plan", respectively.

3.4.1 Proposed Estero Area Plan

The update of the existing area plan is the proposed project under review in this EIR. Like the existing plan, the proposed area plan contains goals and policies to guide land use development and circulation in the planning area. Land use categories and planning area standards changes are also proposed which affect the buildout potential of the area.

3.4.1.1 General Goals and Features

The proposed Estero Area Plan contains a number of general goals for the planning area. These goals, which further define general goals contained in Chapter 1 of the County's Framework for Planning - Coastal Area, are outlined in Section 1.6, "Introduction" of this document. Other general features of the proposed Estero Area Plan include:

- Changing land use categories, combining designations, proposed public facilities, street classifications, future vehicular and non-vehicular access and circulation patterns.
- Reviewing and revising programs and standards that function as mitigating measures for growth anticipated by the plan.
- Updating resource management data for water, sewage disposal, schools, and air quality.
- Adding new goals and objectives for land use planning and circulation.
- Completely updating census statistics, figures, land use acreage, and other data.
- Adding demographic and economic information.
- Correcting mistakes and ambiguities, and other minor reorganization of text.
- Clarifying, reorganizing, revising, and adding goals, policies, programs, and standards for land use planning and circulation.
- Projecting housing and population growth.
- Adding a new chapter on coastal access.

3.4.1.2 Changes from the Existing Area Plan

The proposed Estero Area Plan carries forward many of the planning area standards found in the existing plan. In addition, the update has new standards and guidelines that:

- Offer a variety of development options to preserve contiguous areas of environmentally sensitive habitats;
- Protect and enhance the Morro Bay Estuary and its watershed;
- Protect, enhance, and sustain environmentally sensitive habitat in Los Osos;
- Offer incentives for development of mixed uses (e.g. commercial and residential), especially in central business districts, and senior citizen housing;
- Provide a new mixed use area in the central portion of Los Osos, where a specific plan would enable development of a multi-use business park and a variety of other uses;
- Require referral of certain development applications within identified "planning impact areas" to the City of Morro Bay and the Cayucos Citizens Advisory Council for review and comment;
- Set minimum residential densities in certain multi-family land use categories in Los Osos.
- Encourage pedestrian-oriented commercial areas in Los Osos and Cayucos; and
- Reduce the visual massing of buildings in the Cayucos central business district.

The proposed area plan establishes a voluntary, community-based transfer of development credits (TDC) program for Los Osos. TDC programs allow development potential to be shifted from environmentally or otherwise sensitive sending (TDCS) sites to receiving (TDCR) sites that are appropriate for higher intensity development.

3.4.2 Proposed Land Use Categories, Policies, Programs, and Standards

Many land use changes are proposed throughout the Estero planning area as part of the proposed Estero Area Plan. A comparison of the acreage currently dedicated to each of the 13 land use categories in the planning area to that proposed under the proposed Estero Area Plan is provided in Table 3-5. In addition to land use designation changes, new policies, programs and standards are proposed.

Policies are general recommendations for land use practices that may be implemented through programs and standards. Programs are optional actions. A recommended program may be implemented if funding is available and if the program receives community support. Standards are mandatory requirements. New development must comply with all applicable standards. In the context of this EIR, standards and policies may reduce project impacts because implementation is a part of the proposed project. Programs may also serve to reduce project impacts, but implementation is not assured until program funding is obtained. In the following discussion, selected policies, programs and standards, which are intended to ameliorate project impacts, are presented for each of the Estero project sub-areas. For a complete list of the proposed policies, standards, and programs refer to Chapters 2-8 in the Draft Estero Area Plan Update (July 2003).

The proposed area plan covers ~~would result in a~~ slightly more ~~increase in total~~ acreage than the existing plan. This is due to the inclusion within the Estero planning area of portions of Cuesta College and Camp San Luis Obispo that are located within the coastal zone. This change constitutes an amendment to the San Luis Obispo Area Plan to be processed concurrently with the Estero Area Plan Update. The other amendment to the San Luis Obispo Area Plan proceeding along with the Estero Area Plan Update package is the creation of a referral area in the Los Osos Creek watershed wherein applications for discretionary land use permits, land divisions and General Plan amendments would be referred to the Los Osos Citizen's Advisory Committee (LOCAC). A similar referral area is being created within the Adelaida planning area for the Cayucos Citizen's Advisory Council which is roughly coterminous with Cayucos Fringe area. In addition, a concurrent amendment to the Adelaida Area Plan is proposed which would apply the Estero Marine Terminal standards contained in the Estero Area Plan to inland, as well as coastal portions of the Marine Terminal property. Other land use designation changes and selected policies, programs, and standards are discussed for Rural Estero, Cayucos and Los Osos below.

Table 3-5: Planning Area Land Use Changes (acres)

Land Use Categories	Existing Plan	% of Land In Category	Proposed Plan	% of Land In Category	Net Change[1]
Agriculture	31,729	75.63%	31,415	74.21%	(314)
Rural Lands	683	1.63%	731	1.73%	48
Recreation	5,395	12.86%	5,355	12.65%	(40)
Open Space	822	1.96%	1,483	3.50%	661
Residential Rural	174	0.41%	103	0.24%	(71)
Residential Suburban	1,018	2.43%	893	2.11%	(125)
Residential Single Family (RSF)	1,515	3.61%	1,316	3.11%	(199)
Residential Multi-Family (RMF)	169	0.40%	150	0.35%	(19)
Office and Professional	29	0.07%	12	0.03%	(17)
Commercial Retail (CR)	79	0.19%	90	0.21%	11
Commercial Service (CS)	24	0.06%	25	0.06%	1
Industrial	0	0.00%	0	0.00%	0
Public Facilities	305	0.73%	687	1.62%	382
Commercial Retail, Public Facilities	8	0.02%	0	0.00%	(8)
Office and Professional, Public Facilities	3	0.01%	0	0.00%	(3)
Morro Shores Mixed Use Area (RMF, RSF, CS, CR)[2]	0	0.00%	75	0.18%	75
Total (net) Acres[1]	41,953	100.00%	42,335	100.00%	382

Sources: County of San Luis Obispo, Estero Area Plan Update, Land Use, Public Hearing Draft August July 2003, Table 4-1, Pp. 4-7.
Notes: 1. Totals may vary due to rounding partial acres. 2. Morro Shores Mixed Use Category acreage:: RMF, RSF, CS, CR: 64.05 acres; CR, PF: 8.25 acres; OP, PF: 3.2 acres

3.4.2.1 Planning Area Standards

Planning area standards respond to concerns in a particular rural area or community. The standards can range from special setbacks in one neighborhood, to restrictions on certain land uses that would otherwise be allowable. These standards for proposed projects are in addition to provisions of the Coastal Zone Land Use Ordinance (CZLUO). Where planning area standards conflict with the CZLUO, the planning area standards take precedence.

In the Estero planning area, the standards are organized by area, community, land use designation, and combining designation. Because a large number of standards are described in the "Planning Area Standards" chapter of the Proposed Estero Area Plan, individual standards are not described in this report. However, certain standards are reviewed for the areas slated for changes in land use categories, and applicable standards are integrated into the impacts and mitigation measures section of the EIR. Standards which ameliorate anticipated environmental impacts are listed in the appropriate sections of Section 5.0, "Environmental Consequences".

3.4.2.2 Rural Estero

a. Proposed Land Use Categories

Rural Estero lies outside of the urban reserve lines of Cayucos, Los Osos and the City of Morro Bay (see Figure 3-2). Under the proposed plan, the area increases from 38,607 to 39,099 acres. This increase is primarily due to the addition of 402 acres under the jurisdiction of Cuesta Community College and Camp San Luis Obispo into the Estero planning area from the San Luis Obispo Planning Area (see Table 3-6).

In the Agriculture land use category, two parcels totaling 48 acres are reclassified as Rural Lands under the proposed area plan, 20 acres of Turri Road Public Facilities are reclassified as Agricultural and the remaining 275 acres of agriculture is reclassified as Open Space. Overall, acreage of land in the Agriculture category decreases by 304 acres under the proposed area plan.

Two areas totaling 90 acres are removed from the Los Osos Urban Reserve Line and are added to Rural Estero in the Open Space designation. These two areas are the parcels that make up the Elfin Forest and a parcel of state-owned land west of Pecho Valley Road. Combined with the 275 acres of Agricultural lands converted to Open Space this yields a total of 366 acres reclassified as Open Space.

The land use patterns proposed in the proposed Estero Area Plan for Rural Estero are similar to those in the existing area plan.

Table 3-6: Land Use Changes, Rural Estero (acres)

Land Use Categories	Existing Plan	% of Land In Category	Proposed Plan	% of Land In Category	Net Change[1]
Agriculture	31,719	82.16%	31,415	80.35%	(304)
Rural Lands	683	1.77%	731	1.87%	48
Recreation	5,206	13.48%	5,206	13.31%	0
Open Space	653	1.69%	1,019	2.61%	366
Residential Rural	34	0.09%	34	0.09%	0
Residential Suburban	91	0.24%	91	0.23%	0
Residential Single Family	0	0.00%	0	0.00%	0
Residential Multi-Family	0	0.00%	0	0.00%	0
Office and Professional	0	0.00%	0	0.00%	0
Commercial Retail	0	0.00%	0	0.00%	0
Commercial Service	0	0.00%	0	0.00%	0
Industrial	0	0.00%	0	0.00%	0
Public Facilities	221	0.57%	603	1.54%	382
Total (net) Acres[1]	38,607	100.00%	39,099	100.00%	492

Sources: *Draft Estero Area Plan Update* Background Report, Cayucos Fringe Land Use Survey Buildout and Population Projection: November, 1994 and County of San Luis Obispo, *Estero Area Plan Update, Land Use*, August. 2003, Table 4-1, Pp. 4-7,
Notes: 1. Totals may vary due to rounding of partial acres.

b. Proposed Policies, Programs, and Standards

Table 3-7 presents some of the key policies, programs and standards applicable to Rural Estero, as well as to the entire planning area. A complete listing of applicable policies, programs and standards may be found in the Draft Estero Area Plan Update July 2003). The standards for Rural Estero require referral of certain development applications within identified "planning impact areas" to the City of Morro Bay and the Los Osos Community Advisory Council for review and comment. Policies developed for the rural areas include maintaining existing Agriculture land use categories, not expanding urban reserve lines, preventing urban sprawl, and supporting permanent protection and management of the County's significant marine resources, with particular emphasis on the Morro Bay Estuary.

3.4.2.3 Cayucos

Cayucos is located in the northwest portion of the planning area (see Figure 3-3). Under both the existing and proposed plan, Cayucos covers 339 net acres which is less than one percent of the Estero planning area.

a. Proposed Land Use Categories

Under the proposed plan, the amount of agricultural land within the urban reserve line would decrease by approximately 10 acres on property for which a land conservation contract was terminated by the land owner. The agricultural preserve on this property is proposed to be "disestablished" as part of the proposed Estero Area Plan and would no longer be accorded agricultural preserve status. The zoning of this parcel changes to RMF.

Table 3-7: Rural Estero: Selected Policies, Programs & Standards

Location	Policies, Programs & Standards
Chorro and Morro Creek watersheds and groundwater basins	• **Standard:** Refer the following applications within the impact area to City of Morro Bay for review and comment and coordination regarding appropriate infrastructure improvements and development standards: all discretionary applications, including land divisions, general plan amendments. For applications for development subject to discretionary review within the Morro and Chorro groundwater basins, the following also apply: • **Standard:** Applications for development subject to discretionary review within the Morro and Chorro groundwater basins shall not adversely impact aquatic habitats. Environmental review shall evaluate potential impacts of development on groundwater resources.
Shoreline and offshore areas-(Planning Areawide)	**Include the following policies:** Make every effort to secure permanent protection and management of the county's significant marine resources using programs and legislation such as the national estuary and state and national marine sanctuary, and others.
Morro Bay Estuary and its Watershed (includes Los Osos, Rural Estero, Other Watershed)	**Policy**: Where feasible, implement applicable provisions of the Comprehensive Conservation and Management Plan for Morro Bay published by the Morro Bay National Estuary Program through special programs, land use planning strategies, review of development proposals, and public education.
Morro Bay Estuary and its Watershed	**Policy**: Slow the process of bay sedimentation. Keep Chorro and Los Osos Creeks and other watercourses free of excessive sediment and other pollutants to maintain fresh water flow into the estuary, nurture steelhead and support other plant and animal species. (Other important policies are listed on page 6-26 of the Draft Area Plan, which encourage educational programs, and minimize erosion)
Los Osos Groundwater Basin	• **Standard:** New land divisions shall not be approved unless the review authority makes a finding that development resulting from the proposed land division, existing development, and development of all vacant parcels within the Los Osos urban services line can be accommodated by the sustainable yield of the Los Osos groundwater basin without seawater intrusion.
Irish Hills Scenic Backdrop Critical Viewshed and Los Osos Valley Road Scenic Corridor	• **Standard:** These areas are established with the primary purpose of the protecting important views of scenic backdrops, background vistas and foreground areas from Los Osos Valley Road, important plant and animal habitat, and watershed resources. The scenic protection standards in Chapter 23.04 of the CZLUO apply within these areas, in addition to all other applicable standards in the CZLUO.
Planning Areawide	• **Standard:** Cluster or concentrate development in least sensitive portions of site in order to protect and sustain SRAs; significant areas of oaks, coastal strand, coastal sage scrub, dune scrub, maritime chaparral (whether or not in SRA); riparian habitat corridors; rare, endangered or threatened species; and other significant stands of vegetation. Development shall not cause significant adverse impacts to the above features, and shall be consistent with biological continuance of the habitat.
Planning Areawide	• **Standard:** Applications for land divisions, Minor Use Permits and Development Plans within one mile of a municipal well shall be referred to the County Environmental Health Division for review and recommendations in accordance with Chapter 23.06 of the Coastal Zone Land Use Ordinance

Source: *Planning Area Standards, Estero Are Plan Update, Public Hearing Draft,* August 2003.

Additionally, approximately 2 acres of land zoned Recreation would be reclassified as Residential Multi-Family and Commercial Retail. Land use category acreage under the existing and proposed plans is discussed in Table 3-8.

b. Proposed Policies, Programs, and Standards

Many new standards are proposed for the Community of Cayucos and vicinity. The standards most relevant to the EIR include the establishment of a ~~Sensitive Resources Area (SRA)~~ Critical Viewshed ~~combining designation~~ for visual quality protection for all land visible from Highway 1 inland to the first prominent ridge line (outside of the Cayucos Urban Reserve Line). The ~~SRA~~ Critical Viewshed standards are proposed as part of the CZLUO amendment package and are consistent with those standards proposed for SRAs. ~~are similar to other existing visual SRA standards.~~ In addition, an existing SRA west of Cayucos is proposed to be expanded to cover the entire area between the Cayucos urban reserve line west to the planning area boundary, south of Highway 1. The primary purposes of this SRA are to protect views from Highway 1 and to protect sensitive plant species. The existing SRA standards are revised to require ~~criteria for location and screening of development and for~~ biological assessments to ~~biological impacts to~~ address marine mammals. Proposed changes to the visual standards are included in the CZLUO amendment package, which is in progress. Addressing the visual standards through the CZLUO amendment ensures that consistent standards are applied throughout the planning area. Additional information on the combining designations is included in Section 3.5, "Combining Designations".

Table 3-8: Land Use Changes, Cayucos

Land Use Categories	Existing Plan	% of Land In Category	Proposed Plan	% of Land In Category	Net Change[1]
Agriculture	10	2.95%	0	0.06%	(10)
Rural Lands	0	0.00%	0	0.00%	0
Recreation	48	14.16%	46	13.55%	(2)
Open Space	0	0.00%	0	0.00%	0
Residential Rural	0	0.00%	0	0.00%	0
Residential Suburban	0	0.00%	0	0.00%	0
Residential Single Family (RSF)	180	53.10%	180	53.03%	0
Residential Multi-Family (RMF)	59	17.40%	70	20.62%	11
Office and Professional	6	1.77%	6	1.83%	0
Commercial Retail (CR)	17	5.01%	18	5.30%	1
Commercial Service (CS)	1	0.30%	1	0.29%	0
Industrial	0	0.00%	0	0.00%	0
Public Facilities	18	5.31%	18	5.30%	0
Total (net) Acres[1]	339	100.00%	339	100.00%	0

Sources: *Draft Estero Area Plan Update Background Report, Cayucos Fringe Land Use Survey Buildout and Population Projection:* November, 1994 and County of San Luis Obispo, *Estero Area Plan Update, Land Use,* August 2003, Table 4-1, Pp. 4-7 Notes: 1. Totals may vary due to rounding of partial acres.

Standards proposed for the ~~former agricultural preserve~~ agriculturally zoned land in northern Cayucos allow single-family housing, multi-family housing, mobilehomes, and residential accessory uses. A new Sensitive Resource Area-Terrestrial Habitat (SRA-TH) combining designation has been established near the Cayucos central business district in order to protect and enhance the habitat of a significant overwintering site for Monarch butterflies.

Table 3-9 outlines selected policies, programs, and standards. A complete listing of applicable policies, programs and standards may be found in Chapters 2, 3, 4, 6 and 7 of the proposed Estero Area Plan.

Table 3-9: Cayucos and Vicinity Selected Policies, Programs & Standards

Location	Policies, Programs & Standards
Between North Ocean Avenue and Highway One, north of Locarno Tract, north end of Cayucos: APN 064-481-005	**Standard: Allow the following uses:** Single-family housing, multi-family housing, mobilehomes, and residential accessory uses. The maximum number of dwelling units shall be 10 if at least 65 percent of the site is permanently reserved as undeveloped open space to protect scenic vistas; 15 dwelling units if 75 or more percent of the site is so reserved.
RMF categories within .5 miles of CBD, excluding Locarno	**Standard:** Establish incentives for senior housing, including independent living, assisted living, or other senior projects: e.g. 38 units/acre within .5 miles of CBD (straight line distance), relax Floor Area Ratio (FAR), open area requirements.
Communitywide	**Standard:** New land divisions, other than condominium conversions, shall not be approved unless the review authority makes a finding that there are sufficient waster and sewer capacities to serve development resulting from the proposed land division, existing development, and all vacant parcels at buildout under this plan.
Communitywide	**Program:** Amend the Title 26, the Growth Management Ordinance, to limit new residential growth to an annual rate of 2.3 % (50 units in the first year) within the URL.
Communitywide	**Policy:** Generally, do not expand the urban reserve line
Communitywide	**Policy:** Support efforts to acquire and develop a new elementary school on an appropriate site as close as possible to the existing urban reserve line. In the event that an appropriate elementary school site is selected outside and in close proximity to the existing URL, the URL and urban services line should be extended to include that site, and the needed land use category change should be initiated.
Communitywide	**Policy:** Support creation of greenbelt adjacent to the urban reserve line to clearly define the urban edge of Cayucos , prevent urban sprawl, maintain agricultural resources, protect critical habitat of sensitive plants and animals, and protect scenic qualities. Offer incentives for landowners to participate in a greenbelt program.
Communitywide	**Policy:** Facilitate provision of supplemental water to accommodate future development. **Program:** Water purveyors should set goal of reducing residential water demand by at least 20% and should cooperatively implement conservation programs involving measures such as: a. public education; b. leak detection; c. landscape conversion; and d. retrofit programs

Source: *Planning Area Standards, Estero Area Plan Update, Public Hearing Draft, August 2003*

3.4.2.4 Los Osos

The community of Los Osos is located in the southwestern portion of the planning area (See Figure 3-4). The Los Osos area covers approximately 2,900 net acres, or about seven percent of the total planning area under the proposed and existing plan. Table 3-10 shows the acreage in the Los Osos area within each land use category under both the existing and proposed plans.

Table 3-10: Land Use Changes, Los Osos

Land Use Categories	Existing Plan	% of Land In Category	Proposed Plan	% of Land In Category	Net Change[1]
Agriculture	0	0.00%	0	0.00%	0
Rural Lands	0	0.00%	0	0.00%	0
Recreation	141	4.69%	103	3.56%	(38)
Open Space	169	5.62%	505	17.43%	336
Residential Rural	140	4.66%	69	2.38%	(71)
Residential Suburban	927	30.83%	761	26.27%	(166)
Residential Single Family	1,335	44.40%	1,096	37.83%	(239)
Residential Multi-Family	110	3.66%	80	2.76%	(30)
Office and Professional	23	0.76%	6	0.21%	(17)
Commercial Retail	62	2.06%	72	2.49%	10
Commercial Service	23	0.76%	24	0.83%	1
Industrial	0	0.00%	0	0.00%	0
Public Facilities	66	2.19%	106	3.66%	40
RSF, RMF, CS, CR (Morro Shores Mixed Use Area):					
CR, PF	8	0.27%	8	0.28%	0
O/P, PF	3	0.10%	3	0.10%	0
RSF, RMF, CS, CR	N/A		64	2.21%	-
Total (net) Acres[2]	3,007	100.00%	2,897	100.00%	(110)

Sources: *Draft Estero Area Plan Update Background Report, Cayucos Fringe Land Use Survey Buildout and Population Projection:* November, 1994 and County of San Luis Obispo, *Estero Area Plan Update,* Land Use, July 2003, Table 4-1, Pp. 4-7.
Notes:
1.. Totals may differ due to rounding partial acres.

Land use categories and policies, programs and standards for Los Osos are summarized for the community as a whole.

a. Community-wide Land Use Changes

In the community of Los Osos, some areas are removed from inside the urban reserve line. Several land use designation changes are proposed, especially in and around the central business district and in the southern hillsides. Overall, the number of acres designated for residential uses has been reduced.

*1. **Proposed Land Use Categories.*** The acreage in the Los Osos urban reserve line decreases by 90 acres under the proposed plan.

There are no Agriculture, Rural Lands, or Industrial land use categories within the urban reserve line in either the existing or the proposed area plan. Under the proposed plan, areas designated Recreation decrease by 38 acres, while areas designated for Open Space increase by 336 acres.

In the residential land use categories, the acreage of the Residential Suburban, Residential Rural, Residential Single Family, and Residential Multi-Family categories decrease, with the most significant decreases in Residential Suburban and Residential Single Family categories.

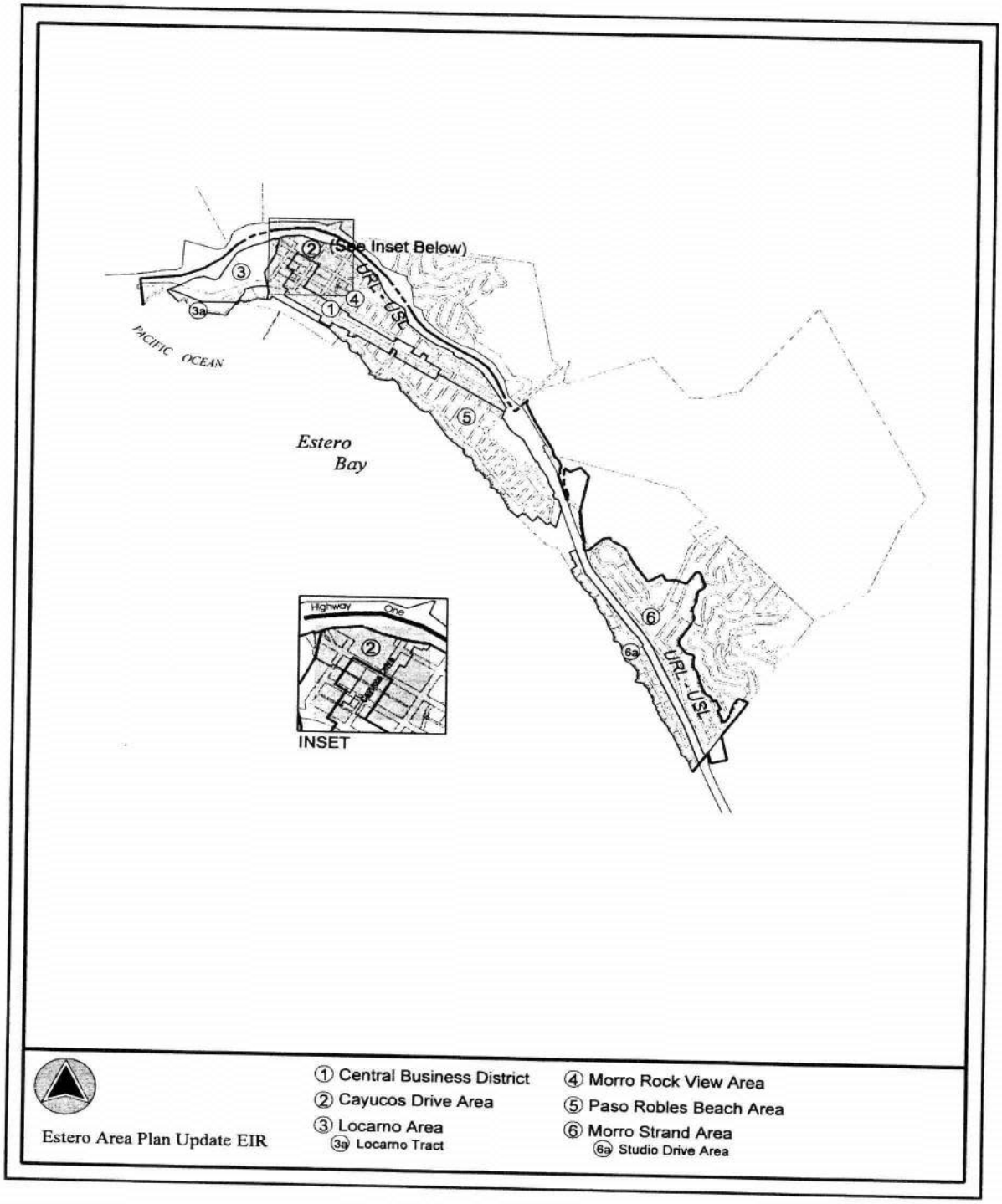


Figure 3-3 Cayucos Map

In the office and commercial categories, Office/Professional decreases by 17 acres while Commercial Retail increases by 10 acres. In the central business district, eight acres of Office/Professional are rezoned to Commercial Retail. Another eight acres of Office/Professional are rezoned to Residential Multi-Family and excluded from the central business district, while planning area standards are revised to include incentives for senior housing.

A new mixed-use area is established west of the central business district, south of Los Osos Valley Road. Land use categories of this 75-acre area are changed from Residential Single-Family (RSF), Residential Multi-Family (RMF), Commercial Retail(CR), and Office and Professional to a designation of RSF, RMF, CR, and Commercial Service (CS) that covers the entire mixed-use area. A map of Los Osos follows as Figure 3-4.

2. Policies, Programs and Standards. Several standards are proposed to reduce environmental hazards and to protect biological and water resources.

Standards are proposed for Los Osos and the rest of the planning area which require concentrated or clustered housing to protect environmentally sensitive resources. The standards encourage protection of contiguous sensitive areas where possible.

General policies for Los Osos support creation of a greenbelt adjacent to the urban reserve line to clearly define the urban edge of Los Osos, prevent urban sprawl, discourage conversion of agricultural land, and protect unique and sensitive habitat.

Other standards establish minimum parcel sizes for land divisions in certain areas, provide incentives for the development of senior housing, and encourage mixed use developments in the central business district and the Baywood commercial area. Table 3-11 outlines selected standards for Los Osos. The full text of the proposed changes to policies, programs and standards may be found in the Draft Estero Area Plan Update (July 2003).

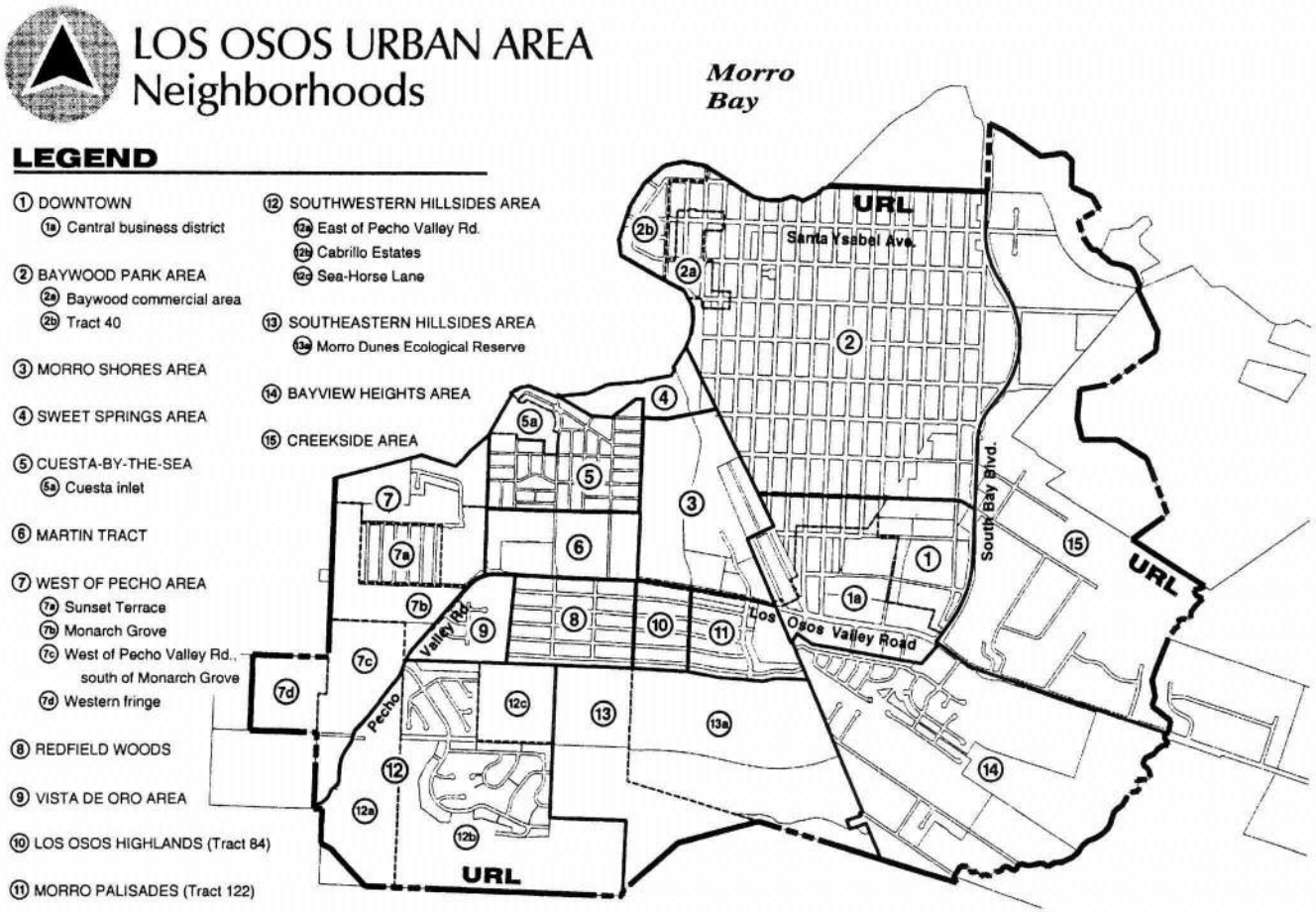


Figure 3-4: Los Osos Map

Table 3-11: Selected Policies, Programs and Standards for Los Osos

Location	Policies, Programs, Standards
CR and OP categories in CBD	Various incentives to encourage mixed use in Central Business District (CBD) allow max residential density of 15 units/acre calculated using acreage of entire mixed use site. Incentives for senior housing, including independent living, assisted living, or other senior projects: e.g. 19 units/acre calculated using acreage of entire mixed use site, relax Floor Area Ratio (FAR), open area requirements.
RMF categories within .5 miles of CBD, CR categories within CBD	Incentives for senior housing, including independent living, assisted living, or other senior projects: e.g. 38 units/acre in RMF within .5 miles of CBD (straight line distance), relax FAR, open area requirements.
All RMF categories except Morro Shores and West of Pecho areas which have specified minimum densities	**Minimum** overall density 10 units/ac. for parcels > 10,000 ft.^{2}; if physically feasible and environmental impacts can be mitigated
Baywood CR:	E/side 3rd, Santa Maria to s/o El Morro: allow multi-family as principal use at maximum density of 15/acre; encourage motels, B&Bs; W/side 3rd, Santa Maria to n/o Santa Ysabel; north, south sides Santa Ysabel, 3rd to 4th: allow residential only on 2nd story above commercial at 15 units/acre using acreage of entire mixed use site
Areawide	Concentrate or cluster development to protect and not adversely impact sensitive habitats (in SRA or not): ecologically significant areas of oak woodland, coastal strand, coastal sage scrub, maritime chaparral communities; all riparian habitat corridors; rare, endangered or threatened species; other significant stands of vegetation. Apply CZLUO standards for environmentally sensitive habitats to development within 100ft of the preceding sensitive areas
Areawide	Policy: Monitor water demand through the Resource Management System to assure that new development can be supported by available water supplies without depleting groundwater supplies or degrading water quality, including annual report to board.
Location	**Standards**
Areawide	**Policy:** Monitor sewage flows through the Resource Management System to assure that new development can be accommodated by sewage disposal capacities
Areawide	**Program:** The water purveyors within the Los Osos groundwater basin should do all of the following: • Pursue water conservation measures and water recycling programs to assure that the existing groundwater supply can serve the expected buildout population. • Estimate water demand from agricultural irrigation and private wells, as well as urban demand, to confirm water use estimates. **Program:** After a groundwater study of the Los Osos groundwater basin has been completed and the effects of a communitywide sewer system are better understood, the county should reevaluate the Estero Area Plan with regard to the ability of the sustainable yield of the Los Osos groundwater basin to support the buildout population of Los Osos.
Areawide	**Standard:** Overriding Land Division Requirements. New land divisions shall be prohibited unless all of the following criteria are satisfied: • Development on all proposed building sites results in no adverse impacts to environmentally sensitive area and the required setbacks therefrom, as verified by the required biological report. • Building sites shall not be located on slopes or ridgetops so that structures are silhouetted against the sky as viewed from public roads, public beaches, the ocean, or the Morro Bay estuary. **Standard:** Environmentally Sensitive Habitat: Site Disturbance. The following standards apply where it is not feasible to locate a building site without causing adverse impacts to environmentally sensitive areas and the required setbacks therefrom, as verified by the required biological report.

	• The maximum total, aggregate amount of site disturbance shall be limited to avoid and mitigate adverse environmental effects to the maximum extent feasible, except as otherwise provided in the Los Osos combining designations standards, consistent with applicable legal requirements to allow reasonable use of the site.
Communitywide	Replace ISCA (Community Standard 2) with standards: • Evaluate proposed general plan amendments regarding effects on water supply and demand. Approve only amendments that maintain or decrease net water use. • existing Coastal Plan policies (Public Works 1,6 and 8) and implementing CZLUO provisions already deal with service capacities, adequacy of services, and priority uses
Communitywide	**Standard: Water Capacity,** New land divisions, other than condominium conversions, shall not be approved unless the review authority makes a finding that the following development can be accommodated by the sustainable yield of the Los Osos groundwater basin without seawater intrusion: development resulting from the proposed land division, existing development (at current rates of water use and occupancy), and development of all vacant parcels within the Los Osos urban services line at buildout under this plan. This finding shall be based on the best available scientific information. **Standard: Sewer Capacity**, Land Divisions Within the Sewer Service Area. New land divisions, other than condominium conversions, within the service area of the community sewer provider, shall not be approved unless the review authority makes a finding that a community sewer system is in operation and has sufficient capacity to serve the following: development resulting from the proposed land division, existing development (at current rates of water use and occupancy), and development of all vacant parcels within the Los Osos urban services line at buildout under this plan.
Communitywide	Standard for development to protect and maintain stands of native trees and trees that provide valuable habitat to the maximum extent feasible, while allowing reasonable use of the property
Communitywide	Standard for land divisions, minor use permits and developmental plans to retain healthy Monterey pines where feasible, except where removal is appropriate for habitat restoration or enhancement, and replace diseased or old pines with suitable species
Communitywide	Standards to require planting of street trees for all new land divisions and other development, in accordance with requirements for size, number, location and tree characteristics
Communitywide	Standard that calls for appropriate public vehicular, bicycle, pedestrian and equestrian connections to surrounding areas in new land divisions and residential projects.
Communitywide	Standard to limit the number of parking spaces provided in all Commercial Retail and Office and Professional categories in the CBD and Baywood Commercial areas so that the number is no more than required by Ch..23.04 of CZLUO. Allow community and on street parking to satisfy parking requirements.

Source: *Planning Area Standards, Estero Are Plan Update, Public Hearing Draft,* August 2003.

3.5 Combining Designations

Combining designations are special overlay zones applied in areas with potentially hazardous conditions or special resources. Proposed projects in these areas may require more detailed review to avoid or minimize adverse environmental impacts or the effects of hazardous conditions. In some cases, specific standards have been adopted where a combining designation is applied.

Combining designations are included in the existing plan for several types of hazards and resources in the planning areas, including geologic study and flood hazard areas, sensitive resource areas, historic areas, areas in the coastal zone, and energy and extractive areas. Each type of combining designation is listed below along with the applicable procedures for project review and a list of specific designations which are applicable in the Estero planning area.

Local Coastal Program (LCP)
All of the Estero planning area lies within the LCP combining designation. This designation identifies specific programs to ensure that access to the shoreline is provided.

Geologic Study Area (GSA)
For all proposed development projects located within a Geologic Study Area, a geologic and soils report prepared by a certified engineering geologist and/or registered civil engineer is required. The report covers seismic shaking, liquefaction or landslide, and potential hazard of surface fault rupture, as applicable. The report also provides conclusions and recommendations for building techniques, site preparation measures, and setbacks which would reduce risks to life and property to insignificant levels. All land uses in a Geologic Study Area must also adhere to other specific standards relating to grading, seismic hazard areas, erosion and geologic stability.[1]

The following are the GSAs identified in the proposed plan.

- Hillside Areas GSA . This GSA is located on hillsides subject to high landslide risk, and covers many of the hillsides above Morro Bay and Cayucos.

- Bluff Erosion GSA. This GSA is located along portions of the coastline where bluff erosion is a concern Cayucos and Los Osos Liquefaction GSA. The Los Osos urban area and portions of the Cayucos urban area along creeks, some bluffs and the shoreline are subject to a high potential for liquefaction, as identified in the Safety Element of the general plan.

NOTE: Based on information contained in a Fault Evaluation Report prepared by the California Department of Mines and Geology[2], the Los Osos fault zone traverses the southern portion of the Los Osos Valley, extending from the eastern planning area boundary through Los Osos. a 1,000-foot wide zone on either side of the fault trace has a higher potential for ground rupture during an earthquake.

Flood Hazard (FH)
Los Osos, Chorro, Morro, Toro, Willow, Old, Cayucos, Little Cayucos, and Villa Creeks and tributaries. This designation is applied to flood prone areas identified through review of data from federal, state and local agencies. In the Estero planning area, the flood hazard combining designation allows recreation in the Cayucos area, where feasible. Natural drainage courses should be maintained in their natural state to protect native vegetation and wildlife habitats.

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1 County of San Luis Obispo *Coastal Zone Land Use Ordinance, Combining Designation Standards, Sections 23.07.082-084.*

2 California Department of Mines and Geology. Fault Evaluation Report-200, Los Osos Fault Zone, 1989.

Historic Site (H)
As recommended in the proposed plan, Minor Use Permit approval is generally required for modifications to existing historic structures and new structures or uses within 200 feet of the historic structures. Applications for projects within an Historic Site combining designation must include a description of measures proposed to protect the historic resource identified by the Land Use Element. Land use permit applications can be approved only where specified findings are made regarding protection of historic resources. However, the proposed plan allows for alternative methods to protect such resources.

The Estero planning area includes five Historic Site combining designations. Two of these sites are new (Spooner Residence and Cayucos Pier), and one (Captain James Cass House) has been enlarged in the proposed area plan. Other sites protected by the Historic Site designation include the Canet Adobe and the Los Osos Schoolhouse.

Archaeologically Sensitive Areas (AS)
A preliminary site survey is required before a land use or construction permit for development can be issued within an archaeologically sensitive area. This survey is to be conducted by an archaeologist who is knowledgeable in Chumash and/or Salinan Indian culture and approved by the Environmental Coordinator. This site survey examines existing records and covers a preliminary surface check of the site to determine the likelihood of the existence of resources.

The archaeologist prepares a mitigation plan if the preliminary site survey determines that proposed development may have significant effects on existing, known or suspected archaeological resources. The plan may recommend the need for further study, subsurface testing, monitoring during construction activities, project redesign, or other actions to mitigate the impacts on the resource.[3] Land use or construction permits can only be approved if the project includes adequate measures to protect significant archaeological resources.

Typically, the specific locations of archaeologically sensitive sites are not disclosed in order to protect the resource. However, the general locations of archaeologically sensitive areas within urban areas are identified on the combining designation maps, and the sensitivities of given sites are assessed when development permits are submitted.

Sensitive Resource Area (SRA)
Land use permit applications for projects within a Sensitive Resource Area include a description of measures proposed to protect the resource identified by the area plan. An area may receive the SRA designation either because of visual sensitivity (areas of scenic values including geologic features) or environmental or habitat sensitivity (such as terrestrial habitats, coastal streams and riparian vegetation, wetlands, and marine habitat.). The planning area includes three primarily visual SRAs and four primarily habitat-oriented SRAs. However, it should be noted that the protection of biological and scenic resources tends to be inter-related .

Any land use permit application within a Sensitive Resource Area shall be approved only where the Review Authority can make required findings based on the following: preservation and protection of natural features through site design; consideration of natural features and topography in physical improvement design and siting; minimal clearance of topsoil, trees, or other features, and; suitability of soil and subsoil conditions. Additional findings are required for environmentally sensitive habitats: wetlands, streams and riparian vegetation, terrestrial habitat, and marine habitats. The proposed plan includes standards that require clustering or concentrating development in the least sensitive portions of sites in SRAs and other areas that contain ecologically and otherwise significant plants and animals.

Three SRAs primarily protect visual resources: the Ocean Shoreline SRA and Critical Viewsheds, the Morros ~~Area~~ SRA and Critical Viewshed, Including Cerro Cabrillo, Hollister Peak and Associated Hills (SRA), ~~the Highway 1 -~~

[3] County of San Luis Obispo Coastal Zone Land Use Ordinance, Combining Designation Standards, *Section 23.07.104.*

~~Cayucos SRA and Critical Viewshed,~~ and the Coastal Terrace SRA and Critical Viewshed West of Cayucos. In the proposed plan, the Ocean Shoreline, Morros, and Coastal Terrace SRAs are revised~~, and the Highway 1--Cayucos SRA and Critical Viewshed SRA is added,~~ as follows:

- Ocean Shoreline (SRA) and Critical Viewsheds. These ~~highly scenic and~~ sensitive, largely undeveloped ocean shoreline areas include the coastal terraces and shoreline between Point Estero and Cayucos, between Cayucos and the City of Morro Bay, and along Montaña de Oro State Park. Also included is the Morro Bay Sand Spit (discussed separately in this section).[4] In general, concerns include maintaining open views of the shoreline and ocean from Highway 1, providing additional public recreation areas, and maintaining maximum public access to the immediate shoreline.

  The SRA and Critical Viewshed west of Cayucos consists of ~~Among the areas included in this SRA is~~ the entire coastal terrace on the ocean side of Highway 1, extending from the Cayucos urban reserve line west to the planning area boundary. The ~~primary~~ purpose of the SRA standards for this area is to protect views of the shoreline, bay and ocean, and to protect marine mammals and sensitive plants.

- ~~Highway 1 - Cayucos SRA and Critical Viewshed. This SRA covers areas inland of and generally visible from Highway 1, between the highway and the first prominent ridgeline or ridgetop approximately between Toro Creek Road and Villa Creek. These steep, open hillsides are bisected by narrow valleys and provide a scenic backdrop to views of the bay and coastline. The primary purpose of this SRA is to protect scenic views that help define the character of this area. This SRA includes most of the Cayucos hillsides.~~

- The Morros Area SRA and Critical Viewshed. These unique volcanic peaks stretch from San Luis Obispo to Morro Bay and separate the Chorro and Los Osos Valleys. This chain of peaks forms spectacular scenic backdrops and natural landmarks that rise above the valley floor and helps define the character of the area.

  The SRA covers Cerro Cabrillo, Hollister Peak, and associated hills from the topes of these peaks, hills and connecting ridges down to the 300-foot elevation. These areas correspond to the visually prominent peaks and backdrops that are visible from Highway 1, Los Osos Valley Road, Turri Road, and South Bay Boulevard. The SRA standards are intended to protect scenic vistas from ~~Highway 1, Los Osos Valley Road, and Turri Road and South Bay Boulevard~~ from these roads.

- ~~Los Osos Dune Sands. The following provisions are intended to ensure the long-term preservation of the rare and sensitive Los Osos Dune Sands habitat within the "greenbelt" area (which is an Environmentally Sensitive Habitat). Such habitat is of relative high quality compared to that on smaller, isolated, undeveloped lots in the mostly developed, "central urbanized area" of Los Osos (see Figure 7-48 of the Estero Area Plan). Following are the specific objectives:~~

  - ~~Preserve, maintain, and protect rare and specific endangered species;~~

  - ~~Throughout Los Osos, preserve, maintain, and enhance the following environmentally sensitive areas: 1) Los Osos Dune Sands habitat, and 2) natural land forms that are barren or covered with non-native plants and that are potentially restorable to native plant cover such as Morro manzanita and Indian Knob mountainbalm;~~

  - ~~Eliminate any incentives for the illegal or inappropriate removal of Dune Sands habitat;~~

  - ~~Ensure that all new development is compatible with and sensitive to Los Osos Dune Sands~~

[4] Refers to page 6-9 of the proposed Area Plan

~~habitat;~~

~~• Subordinate all public and private development to the protection of critical natural areas~~

- Coastal Terrace SRA and Critical Viewshed West of Cayucos. The Coastal Terrace SRA and Critical Viewshed west of Cayucos is located on ~~This area consists of~~ the coastal terrace ~~west of Cayucos~~ south of Highway One that extends from the Cayucos urban reserve line westward toward the planning area boundary. The purpose of this SRA and Critical Viewshed is to protect views of this scenic coastal area as viewed from Highway 1, public beaches and the ocean, and to protect sensitive plants. ~~Allowable uses shall be limited to crop production and grazing (grazing only), coastal accessways, passive recreation, water wells and impoundments, pipelines and transmission lines.~~

SRAs that protect sensitive habitats are described in Table 3-12. These habitats are sensitive for a variety of reasons. Some of the habitats shelter endangered plant and animal species. Other habitats encompass scarce marine or freshwater resources. The proposed plan includes two new SRAs that protect Monarch butterfly habitat; one in Los Osos and the other in Cayucos.

Table 3-12: Sensitive Resource Areas in Sensitive Habitats

Morro Bay Estuary (SRA). The Morro Bay Estuary is the most important wetland on California's south central coast. It is a shallow lagoon which drains Chorro and Los Osos Creeks, and supports several biotic communities including coastal salt marsh, tidal mudflats, and coastal scrub. The bay supports a wide variety of habitats and many sensitive and endangered plants and animals, including many protected species of migratory birds. It is an essential link in the Pacific Flyway, providing one of the state's largest waterfowl habitats south of the San Francisco Bay. For example, the migratory Brant goose forages on highly significant eelgrass beds. The bay is also one of the country's top areas for birds, according to annual bird counts.
Morro Bay Sand Spit (SRA). This ridge of sand dunes (a continuation of the Hazard Canyon Dunes) separates most of Morro Bay from Estero Bay and plays an important role in Morro Bay's physical and biological environment. It supports an abundance of plant species.
Morro Bay Shoreline (SRA). The Morro Bay tidelands and adjoining shoreline areas are important to the ecology of the bay, and are also highly scenic . Marshlands are particularly important as a source of food and refuge for marine life and also provide feeding and nesting areas for a variety of waterfowl and shorebirds. Critical areas include the following: Sweet Springs and Cuesta-by-the-Sea Marsh (SRA), Los Osos Estuary (SRA), Baywood Peninsula, and the Fairbanks Property.
Los Osos Dune Sands (SRA). These sands provide the soil characteristics that support globally rare habitat in a unique composition of highly sensitive biological communities. The habitats of Los Osos have been disturbed from time to time for agriculture, silviculture and development. However, they usually recover quickly and result in high quality vegetative cover. Together, they support a diversity of native plant species and a number of rare, endangered or threatened species of plants and animals, including the Morro manzanita, Indian Knob mountainbalm, Morro shoulderband snail, and Morro Bay kangaroo rat. The Morro Bay kangaroo rat is an endangered species that has a very restricted range that makes it highly susceptible to human disturbance.
Hazard Canyon (SRA). The threatened Morro manzanita occurs only in the area between Baywood Park and Hazard Canyon. In addition, two of the six known stands of the endangered Indian Knob mountainbalm occur in Hazard Canyon. Many other endemic plant species are found in the dunes near the mouth of the canyon. This area is an excellent example of the successive stages of dune stabilization. Much of this area is within Montana de Oro State Park.
Montana de Oro Grassland (SRA). The marine terrace between Islay and Coon Creeks is a mosaic of the Stipa grassland community and the northern coastal scrub and coastal sage scrub. The terrace also supports numerous wildflowers.
Coon Creek (SRA). Several natural plant communities occur in this area. The most interesting is the Bishop pine forest located on steep slopes just outside Montana de Oro State Park. This is a large conifer forest where specimens of the Bishop pine may have been first collected scientifically and used to describe the species. The county's only native population of Ceanothus griseus is found in this area.
Los Osos Oaks State Reserve (SRA). The Los Osos forest is an 86-acre state park reserve containing outstanding examples of California pygmy oaks-- stunted coast live oaks, growing in a stabilized dune area. Other oaks are also present, making this area an outstanding example of an oak woodland. The forest also includes a strip of open space preserved by the developer of Tract 527, but it is not open to public access.

Los Osos Creek (SRA). The lower eight miles of the creek is an anadromous fish stream (primarily steelhead), and adjacent riparian areas are rich in wildlife. Environmental concerns include contamination and excessive siltation of both the creek and the bay by development or other adverse uses occurring too close to the creek and its tributaries.
Los Osos Monarch Butterfly Habitat (SRA). This eucalyptus grove is located west of Pecho Valley Road in the vicinity of Monarch Lane. It has been historically used for overwintering, and is a regionally important roosting site.
Cayucos Monarch Butterfly Habitat (SRA). This overwintering site is located near the central business district. It has been frequented by very large numbers of butterflies for a number of years, and is one of the significant sites in the entire state.
Eto and Warden Lakes (SRA). These are two of the few remaining isolated freshwater marshes in the county. Both lie within the Los Osos Creek drainage. The freshwater marshes, along with the associated riparian habitat, are important sites for migratory birds.
Whale Rock Reservoir Watershed (SRA). This area encompasses the immediate watershed of Whale Rock Reservoir owned by the State. Rangeland uses surrounding the state-owned land should provide sufficient protection of the watershed.
Camp San Luis Obispo Relict Grasslands (SRA). Along the northern boundary of this former military reservation are several relict stands of grasslands, typical of the original central valley prairie.

Source: *Estero Area Plan Update, Chapter 6: Environmental and Cultural Resource Policies and Programs , Public Hearing Draft,* August 2003.

Transfer of Development Credits (TDC)

Transfer of Development Credits - Receiving (TDCR) and Transfer of Development Credits - Sending (TDCS).

These identify sites included in a proposed community-based transfer of development credits program for Los Osos and vicinity. TDC programs allow development potential to be shifted from environmentally or otherwise sensitive TDCS sites to TDCR sites that are appropriate for higher intensity development.

The TDCR and TDCS sites are described as follows:

- South Bay Boulevard (TDCR). The area bounded by South Bay Blvd., 18th Street, Ramona Avenue and Santa Ysabel Avenue that is within the Residential Single-Family and Commercial Retail land use categories is eligible to participate in the TDC program as a TDCR site. Under the TDC program, development could include a combination of neighborhood commercial, senior housing, multi-family, and recreational uses.

- RSF Parcels Eligible for Secondary Dwellings (TDCR). All parcels in the Residential Single-Family land use category that are equal to or greater than 6,000 square feet in area are eligible to participate in the TDC program as TDCR sites. Under the TDC program, secondary dwellings could be developed on parcels that would otherwise be too small according to Coastal Zone Land Use Ordinance standards for Los Osos.

- Los Osos Creek and Vicinity (TDCS). Certain parcels in the vicinity of Los Osos Creek are eligible to participate in the TDC program as TDCS sites: parcels in the Agriculture land use category outside of and immediately adjacent to the urban reserve line, and other parcels in the Residential Rural and Residential Suburban categories adjacent to and west of Los Osos Creek within the urban reserve line.

- Baywood Park West of 3rd Street, Eastern Portion of Sweet Springs Area, Cuesta-By-The-Sea North of Ramona Ave. (TDCS). Several properties west of 3rd Street, adjacent to the shoreline of the Morro Bay Estuary are eligible to participate in the TDC program as TDCS sites due to sensitive habitat and visual character. These sites are the Baywood Park Area west of 3rd Street; the eastern portion of the Sweet Springs Area; and an area in Cuesta-By-The Sea located north of Ramona Ave.,west of the first tier of lots west of Broderson Ave., and south of the unimproved portion of Pine Ave.[5]

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5 *Estero Area Plan Update, Environmental and Cultural Resource Policies and Programs*, Pp. 6-47, August 2003

- West of Pecho Valley Road (TDCS). A parcel ~~int ch~~ in the Western Fringe of the West of Pecho Area is eligible to participate in the TDC program as a TDCS site.

- Western Hillsides (TDCS). Properties at the upper elevations of the Western Hillsides in the Residential Suburban category are eligible to participate in the TDC program as TDCS sites.

Los Osos Habitat Conservation Program.
Los Osos and its environs host a number of rare and endangered species of plants and animals. In an effort to assist with the recovery of these species, the County has developed a number of methods for reducing development pressures on their habitat. These methods include the transfer of development credits program described above, expansion of SRA combining designation to protect habitat of sensitive species, preparation of a Habitat Conservation Plan (HCP) and implementation of other programs to protect and manage sensitive habitat, mandatory concentrating or clustering of development, purchase of open space as mitigation for the sewer development, and zoning standards. These efforts are being coordinated with the California Department of Fish and Game, the U.S. Fish and Wildlife Service, the Land Conservancy and others.

3.6 Buildout under the Proposed Area Plan

The estimated maximum likely residential and non-residential development that could occur under the ~~general~~ area plan is called "buildout capacity". It is a function of: 1) the acreage of each land use category or parcel; 2) the number of parcels that can be created; 3) allowable residential density and estimated square footage of non-residential development; and 4) the number of people per household. The buildout capacity may also include consideration of constraints such as topography, the size and shape of parcels and market factors.

3.6.1 Residential Buildout

Table 3-13 shows the projected population and housing buildout capacity in the urban and rural areas within the planning area. As this table illustrates, buildout under the proposed Area Plan would increase the number of dwellings in the Estero planning area by 2,239 units, increasing the total to 11,210 units. The total planning area's population would increase by 7,701, to a total population of 26,171 under the proposed plan.[6]

6 Calculations from *Revised Public Hearing Draft Plan Buildout Summary*, May 2003

Table 3-13: Proposed Area Plan Residential Buildout

Area	Dwellings			Population		
	Existing (2003)[5]	Buildout Capacity	Potential Increase	Existing (2003)[5]	Buildout Capacity[1]	Potential Increase
Los Osos	6,253	8,033	1,780	14,440	19,601[4]	5,161
Cayucos	2,354	2,489	135	3,080	4,733[2]	1,653
Rural Area	364	688	324	950	1,837[4]	887
Total	**8,971**	**11,210**	**2239**	**18,470**	**26,171**	**7,701**
Other Watershed	175	432	257	466	1,153	687
Cayucos Fringe	123	426	303	362	1,252[3]	890

Source: *San Luis Obispo Department of Planning and Building*, July 2003.
Notes:
1. Buildout estimates assume that existing numbers of person per dwelling unit will remain the same in the future.
2. Buildout estimates for Cayucos assume a vacancy rate of 9.3 percent for existing development, 5 percent for future development.
3. Buildout estimates for Cayucos Fringe and other watersheds assume that all dwelling units will be occupied.
4. Buildout estimates for Los Osos and Rural Area assume that all dwelling units will be occupied.
5. Figures for other watershed and Cayucos Fringe are for 1994; no significant changes have occurred since then.

Table 3-14 shows the changes from the existing uses to uses at buildout in the three Estero planning areas for commercial retail, office and professional, commercial service, and hotel/motel units designations. Figures for potential new uses (other than camping units) are not cited in Table 3-14 for Rural Estero, Cayucos Fringe, and Other Watershed. The reason for this is the difficulty in estimating how much development of barns, greenhouses and other non-residential uses may occur in the future. Part of the difficulty in making such estimates is that the large amounts of acreage in the rural areas would yield results that are highly theoretical and potentially unrealistic. However, it is expected that there will be minor increases in non-residential development in the rural areas.

3.6.2 Development at Major Public Institutions

The ~~Morro Bay watershed~~ secondary study area includes three major public institutions that may impact planned development within the Estero planning area. The facilities are Cuesta Community College, Camp San Luis Obispo and California Men's Colony. Portions of Cuesta Community College and Camp San Luis Obispo are proposed to be included within the Estero planning area as part of this update. This section briefly describes existing and planned development at these facilities. Table 3-15 summarizes this information.

- **Cuesta Community College**

The Cuesta College campus on Highway 1 provides community college services and associate of arts degrees. Enrollment in 2002 was 10,807 students, many of whom were only part-time. Cuesta College employs approximately 151 full-time faculty, 324 part-time faculty, 210 classified staff, 400 hourly and student employees, and 50 managers, administrators, supervisors and confidentials.[7]

7 Public Information and Marketing. Cuesta College, San Luis Obispo County Community College District. Accessed June 17, 2003. <http://academic.cuesta.edu/pim/facts.htm>

Table 3-14: Non-Residential Buildout[1] (in square feet)

Area	Commercial Retail Category Existing	Buildout Capacity	Potential Increase
Los Osos	439,200	668,100	228,900
Cayucos	116,800	174,400	57,600
Rural Area	0	0	0
Total	556,000	842,500	286,500
Area	**Office and Professional Category (does not include business park)** **Existing**	**Buildout Capacity**	**Potential Increase**
Los Osos	10,100	61,600	51,500
Cayucos	12,900	59,400	46,500
Rural Area	0	0	0
Total	23,000	121,000	98,000
Area	**Commercial Service Category (includes business park development in Los Osos)** **Existing**	**Buildout Capacity**	**Potential Increase**
Los Osos	221,000	284,600	63,600
Cayucos	5,900	11,300	5,400
Rural Area	0	0	0
Total	226,900	295,900	69,000
Total For All Uses	**805,900**	**1,259,400**	**453,500**
Area	**Hotel/Motel Units (figures in the rural area are for camping units)** **Existing**	**Buildout Capacity**	**Potential Increase**
Los Osos	74	309	235
Cayucos	177	238	61
Rural	85	165	80
Total	**255**	**763**	**508**
Other Watershed	50	52	2

Source: *County of San Luis Obispo, Department of Planning & Building Estero Area Plan Update, Population and Economy,* August 2003, Pp. 2-11, 2-12 County of San Luis Obispo Department of Planning and building,. July 2003.
Note: 1. Excludes non-residential development in Recreation, Open Space, Public Facilities and Residential land use categories.

- **Camp San Luis Obispo**

Camp San Luis Obispo provides operational, training and logistical support to a wide variety of civilian and military agencies at federal, state and local levels. These agencies include the United States Property and Fiscal Office, the California Army and National Guard, the United States Army Reserve, the United States Coast Guard Reserve, the California Conservation Corps, the California Specialized Training Institute, Cuesta Community College and CalTrans. Units of the National Guard, Army Reserve and Active Army occupy facilities at Camp San Luis Obispo for two to three week periods of training duty, primarily during the summer months. In the past, the camp has also provided temporary housing and an operational base for fire fighting crews during a major wildfire. There are currently about 1,000 employees using the facility, including both military and civilian personnel. There are currently no plans for significant expansion.

- **California Men's Colony**

The Men's Colony is a medium-security prison north of Highway 1. Including both the East and West Facilities,

the total current inmate population of the prison is 6,612 persons, and total staff is about 1,673.[8] Significant expansion of the capacity of the prison is not anticipated.

Table 3-15: Existing and Planned Activity at Major Public Institutions

Facility	Employees	Students	Inmates
Existing			
Cuesta College	1,135	10,807	-
California Men's Colony	1,673	-	6,612
Camp San Luis Obispo	1,000	-	-
Planned			
Cuesta College	420[9]	11,828[10]	-
California Men's Colony	1,800[1]	-	7,000[1]
Camp San Luis Obispo	-	-	-

Sources: John Kellerman, Facilities Planner, California Men's Colony, 2003. and Chris Wilde, Environmental Coordinator, Camp San Luis Obispo, 2003. *Draft Estero Area Plan EIR*, 1999.

Notes:

1. Maximum capacity based on current infrastructure. No plans to develop more infrastructure.

8 California Department of Corrections. *California Men's Colony, Institution Statistics.* June 20, 2003. <http://www.cdc.state.ca.us/InstitutionsDiv/INSTDIV/facilities/fac_prison_CMC.asp>

9 *Draft Estero Area Plan EIR*, San Luis Obispo County, 1999.

10 Student Housing North FEIR, Technical Appendices. California Polytechnic State University. September, 2003.

4.0 Environmental Setting

This section provides a general description of the current environmental conditions within the Estero planning area and each of its subareas.

4.1 Historical Perspective



Estero Bay was sighted by Cabrillo in 1542 during his exploration of the California Coast. In 1769, Portola's expedition camped at the mouth of Villa Creek which enters the ocean at the northern most boundary of the Estero planning area.

Originally an area of Native American settlement, the Central Coast grew under Spanish influence with the founding of the San Luis Obispo de Tolosa mission in 1772. The community that developed around the mission remained tiny through the Spanish, Mexican and early American periods. Agriculture dominated the area's early economy. Only with the coming of the Southern Pacific Railroad in 1894, did the Central Coast begin to experience significant population growth.

Cayucos. The bay at Cayucos was named by the Spanish for the Chumash kayaks. The community of Cayucos was laid out in 1873 by Chauncey Phillips. The main street in Cayucos was Ocean Avenue which extended approximately one mile long and 100 feet wide. Phillips helped settle the community by enticing Italian Swiss immigrants to relocate to the area and to establish dairy farms. He was so successful that Cayucos became known as "Little Italy". The first county road was constructed from San Luis to San Simeon in the 1870s and was justified by the need to transport dairy products.

The first pier in Cayucos was built in 1875 by Captain James Cass. By the early 1900's an abalone drying enterprise was operating in Cayucos and up until the mid-1940s, seaweed was harvested near Cayucos primarily for export to China. By the 1930s, Cayucos was attracting tourists, and harbored five party boats used for fishing.

Los Osos. The community of Los Osos is named for the now extinct troop of grizzly bears, "Los Osos" and was settled in the early 1800's and supported farming and grazing. During the early American Period, farming became an increasingly important economic basis in the Los Osos valley by the turn of the century. Following World War II, urban expansion into the Morro Bay/Los Osos Valley region began in earnest.

The area was promoted for its gentle weather ("the land of eternal springtime") and its location mid-way between Los Angeles and San Francisco. By 1935, about 100 homes had been built. The sand spit and Morro Rock were already a part of the State Parks system, and Morro Bay State Park and the associated golf course were attracting tourists. Agriculture, mining and oil production were listed as important local industries, and the National Guard and Camp Roberts were cited as the significant local employers.

The early history of both Cayucos and Los Osos is closely tied to the development of Morro Bay. When the city of Morro Bay readied for incorporation in the 1960s, the inclusion of Baywood and Cayucos within the City was considered.

4.2 General Physical Setting

4.2.1 Location

The Estero planning area occupies approximately 71.5 square miles of land along the coastline in central San Luis Obispo County. The planning area encompasses Point Estero on the north and Point Buchon on the south. The planning area is defined by the coastal zone boundary established by the state in 1976, and thus is subject to two political jurisdictions, the County of San Luis Obispo and the state of California (See Figures 3-1 and 3-2 in Section 3.0, "Project Description"). The Estero Area is comprised of the City of Morro Bay and two major unincorporated communities, Cayucos and Los Osos.

4.2.2 Regional Access

State Route 1 is the principal transportation corridor in the Estero planning area and provides access to coastal destinations located north of the area including Hearst Castle and Big Sur. The regional state highway extends on a south-east to north-west alignment from its junction with U.S. Highway 101 in the City of San Luis Obispo to the San Luis Obispo/Monterey County line and beyond.

State Route 41 runs from the city of Morro Bay to Atascadero and connects U.S. Highway 101 and State Route 1. U.S. Highway 101 serves as a regional route which links the area to both San Francisco and Los Angeles.

4.2.3 Climate and Air Quality

The climate of the Estero planning area can be described as semi-arid with warm, dry summers followed by a cool, rainy period from November to March. Dense morning fog followed by periods of afternoon sunshine is a pattern repeated day after day during the summer months. Temperatures in the Estero area range from a minimum average of 42 degrees Farenheit in January to 79 degrees Farenheit in September. The average annual rainfall for the Estero area is approximately 15.73 inches.

San Luis Obispo County has been identified as a non-attainment area for both ozone and particulates (PM10). Maximum concentrations of other criteria pollutants are currently within state and federal standards. High ozone levels in the County have been occasionally traced to air pollutants transported from other basins including the South Coast Air Basin, the San Francisco Bay Area, and the San Joaquin Valley. However, most exceedences of the state ozone standard measured in the County are the result of local emissions and adverse meteorology.

4.2.4 Demographics

According to the 2000 US Census, the 2000 Estero planning area population is estimated at approximately 28,574 people, including the City of Morro Bay. Most of the population within the planning area resides along the coastline in Cayucos (population 2,943), Los Osos (population 14,351) and Morro Bay (population 10,350).[1] The unincorporated portions of the Estero planning area support a population of 930 people.

The 1980 Census data and current population estimates provide a clear picture of population increases in the two unincorporated communities in the Estero planning area. The population of Los Osos grew from 10,933 in 1980 to 14,351 in 2000, an increase of 31 percent. Cayucos expanded from 2,301 to 2,943 during that period, an increase of 28 percent. During the same period, the population of San Luis Obispo County as a whole rose from 155,435 to 246,681, an increase of nearly 59 percent. The relatively slower rates of growth in Los Osos and Cayucos can be largely attributed to moratoria resulting from sewer and water constraints, respectively.

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1 U.S. Census Bureau (2000). *Summary File 3.* Retrieved June 20, 2003 from <http://factfinder.census.gov/servlet/DTTable?_ts=74193391868>

The Estero planning area has a lower percentage of school-aged children and a higher percentage of elderly residents than the County as a whole. The population of the planning area has educational attainment levels that are higher than the County average. Median household income in San Luis Obispo County in 1999 was $42,428 per year.[2] Approximately 80 percent of the housing stock in this area consists of single family, detached units. This proportion is significantly higher than the same measure county-wide (65%)[3]. A majority (85-90%) of workers in Los Osos and Cayucos work outside of the community in which they reside. The average one-way commute time for these people is about 20 minutes.

4.2.5 Physiography

The Estero planning area is located in San Luis Obispo County. The county is largely rural and a popular destination for visitors primarily because of its scenic variety and beauty. Different areas of the County contain scenery and vegetation reflecting the geography and climate of the region. Stands of pines in the north coastal portion of the County give way to oak-dotted grasslands, chaparral and sand dunes along the southern coast. Inland, livestock populate the grass-covered rolling hills, interrupted by farmland, vineyards, orchards and natural communities such as oak savannah and chaparral habitats. The diverse geologic features which characterize the County include forms of volcanic rock (most notable are the Morros extending from San Luis Obispo to Morro Bay), alluvial material washed into fertile valleys, and sand dunes.

The Estero Area has a primarily north/south orientation, extending along the Pacific Coast from Point Buchon to Point Estero. The level inland valley areas of Los Osos, Morro and Chorro Creeks are dedicated primarily to cultivated agriculture while hillside areas consist largely of rangelands. The steep Santa Lucia mountain range is the major physical barrier dividing the County into coastal and inland portions. It trends northwesterly to define the planning area's eastern boundary. The dark tones of the chaparral and oak woodlands that cover the slopes of the Santa Lucia Mountains provide contrast to the grasslands of the range's lower slopes. This area is sparsely developed, as the steep slopes, dense vegetative cover, and lack of extensive transportation, infrastructure, and public service networks have historically limited urbanization and agricultural activity.

4.2.6 Biological Resources

The Estero planning area supports a variety of major plant communities including marine intertidal, estuarine, coastal salt marsh, freshwater marsh, riparian scrub and woodland, coastal strand, dune scrub, coastal sage scrub, chaparral, oak woodland, non-native grassland, eucalyptus woodland and ruderal (disturbed) vegetation. A variety of habitat types important to wildlife occur within the Estero planning area. Each vegetative community supports assemblages of animal species.

Several sensitive habitats, plant taxa, and animal taxa have been recently or historically known to occur in the Estero planning area. Five sensitive habitat areas, seventeen sensitive plant species, and twelve sensitive animal species are identified in the California Natural Diversity Data Base (CNDDB) for the Estero planning area.[4] In addition to the CNDDB sensitive species list, two plant, ten bird, one amphibian, one reptile, one fish, and two mammalian species considered to be sensitive have been identified as occurring in the vicinity of the planning

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2 U.S. Census Bureau (2000). *Summary File 3.* Retrieved July 7, 2003 from <http://factfinder.census.gov/servlet/DTTable?_ts=75657066535>

3 U.S. Census Bureau (2000) *Summary File 3.* Retrieved July 8, 2003 from <http://factfinder.census.gov/servlet/DTTable?_ts=75730082288>

4 State of California Department of Fish and Game (2003), California Natural Diversity Database (CNDDB). Retrieved from <http://www.dfg.ca.gov/whdab/html/cnddb.html>

area through previous field surveys or are believed to occur in the area due to the presence of appropriate habitat.

Many of the sensitive habitats, plant taxa, and animal taxa are protected within the sensitive resource combining designation. Land use permit applications for projects within a Sensitive Resource Area include a description of measures proposed to protect the resource, along with an environmental review under the CEQA.

Important biological resource areas designated SRAs within the Estero planning area include Morro Bay kangaroo rat habitat, Hazard Canyon, Montana de Oro Grassland, Coon Creek, Los Osos Oak Forest, Los Osos Creek, Eto and Warden Lakes, Camp San Luis Obispo Relict Grassland, and the entire Morro Bay estuary, sand spit and shoreline.

4.2.7 Water Resources

The Estero planning area water supplies are currently obtained primarily from surface and subsurface flows of creeks, and the ground water basins of several coastal streams in the Estero Area. Section 5.4, "Water Resources", lists the storage availabilities and annual safe yields for the creeks within the planning area. The total storage capacity of the six creek basins within the Estero Area is 35,500 acre-feet[5] while the estimated ~~basin~~ yield of these basins is 9,280/9,660 acre-feet per year (AF/Y).[6]

The water supplies of the Estero planning area have historically been derived entirely from local sources with negligible importation of water into the area. Deliveries of State Water Project water to the City of Morro Bay began in October of 1997. Importation of Nacimiento Project water has been requested by both Los Osos and Cayucos water purveyors to supplement existing water supplies, although final commitments have not been made. The City of Morro Bay has developed capacity for sea water desalination. The availability of alternative sources of water such as imported or desalinized water will ultimately affect the overall quantity of water available within the planning area.

4.3 Subarea-Specific Setting

4.3.1 Rural Estero

Rural Estero includes all land not within urban reserve lines of Cayucos and Los Osos or the City of Morro Bay. Rural Estero includes several outstanding natural features including the Morro Bay Estuary, the Morros (a chain of volcanic peaks) and the Montaña de Oro and Morro Bay State Parks and Beaches. Approximately 75% of the land in the Estero planning area is zoned for agricultural uses such as row crops and grazing.

4.3.2 Cayucos

The 2000 population of Cayucos was 2,943. This represents a 28 percent increase over the 1980 population and a 64 percent increase over the 1970 population.

The per capita income of Cayucos residents is significantly greater than the county average and the average household size is smaller. Seventy-five (75) percent of the housing in Cayucos consists of single family units,[7]

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5 *Estero Area Plan Update, Public Hearing Draft, Chapter 3, Table 3-1,* August 2003, San Luis Obispo County.

6 Safe annual yield without/with a community sewer system, *Estero Area Plan Update, Public Hearing Draft, Chapter 3,* August 2003, San Luis Obispo County.

7 U.S. Census Bureau (2000). *Summary File 3.* Retrieved July 7, 2003 from <http://factfinder.census.gov/servlet/DTTable?_ts=75657720615>

compared to a countywide average of about 65 percent. Cayucos has a comparatively large population of adults over 65; close to 22 percent of the population of Cayucos is over 65,[8] compared to a county-wide average of over 14 percent.[9]

4.3.3 Los Osos

The 2000 population of Los Osos was 14,351. Although Los Osos is unincorporated, it is the largest urbanized area in the Estero planning area. In comparison, Morro Bay has a 2000 population of 10,350. The community of Los Osos has grown by over 300 percent since 1970. The population has increased by 31 percent since 1980.

The median household income ($46,558) and per capita household income ($24,838)[10] of Los Osos is higher than the county average, the percentage of children and teenagers in the community is smaller than that in the county as a whole. Seniors 55 and older makeup about 28% of the population in Los Osos, compared to about 23% countywide. The education levels of Los Osos residents are higher than the county average: 48% percent have college degrees compared to about 36%percent county-wide.[11]

4.3.4 Secondary Study Areas

Secondary study areas were studied in connection with the update because of their various relationships, natural and otherwise, to the Estero planning area. The two secondary study areas considered include the upper areas of the Morro Bay watershed and the "Cayucos Fringe".

Other Watershed

The Other Watershed area extends beyond the Estero planning area into portions of the Salinas River, San Luis Obispo, and San Luis Bay Planning Areas. The area extends into the Los Osos and Chorro Valleys and to Cuesta Ridge (See Figure 3-2).

The Other Watershed is sparsely populated and characterized by low rolling hills and valleys which transition to more prominent coastal range mountains. The area supports non-native grassland, chaparral, riparian scrub/woodland and oak woodland communities among agricultural uses and rural residences. Bird, reptile and mammalian species thrive in the large and mostly contiguous stretches of undeveloped land in the Other Watershed and benefit from adequate separation from urbanized areas.

The upper portions of the Morro Bay watershed outside of the Estero planning area total about 17,000 acres (approximately 27 square miles). Land use and development activity in the upper portions of the watershed have a great effect on downstream areas within the Estero planning area and ultimately on the Morro Bay estuary. These downstream effects involve water supply, erosion, pollution and habitat, for example. Accordingly, land

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8 U.S. Census Bureau (2000). *Summary File 3.* Retrieved June 20, 2003 from <http://factfinder.census.gov/servlet/DTTable?_ts=74192783451>

9 U.S. Census Bureau (2000). *Summary File 3.* Retrieved June 20, 2003 from <http://factfinder.census.gov/servlet/DTTable?_ts=74193789687>

10 U.S. Census Bureau (2000). *Summary File 3.* Retrieved July 15, 2003 from <http://factfinder.census.gov/servlet/DTTable?_ts=76351419039>

11 U.S. Census Bureau (2000). *Summary File 3.* Retrieved July 7, 2003 from <http://factfinder.census.gov/servlet/DTGeoSearchByListServlet?ds_name=DEC_2000_SF3_U&_lang=en&_ts=75729716743>

use planning decisions should take into consideration the effects of activities in the Other Watershed area on the rest of the watershed and on the Morro Bay estuary.

In recognition of the watershed as a single, inter-related system, the update of the Estero Area Plan has taken into consideration the entire Morro Bay watershed. Land uses and environmental constraints in this secondary study area were studied in connection with the goals, policies, standards, and programs of the Estero Area Plan.

Cayucos Fringe

The Cayucos Fringe area covers approximately 34,000 acres, nearly 53 square miles (See Figure 3-2). The Fringe is included as a secondary study area for two reasons. First, the Cayucos Fringe includes most of the watersheds that affect Cayucos, especially Whale Rock Reservoir and its watershed which supplies water to Cayucos. Second, the Cayucos Fringe includes the area served by the Cayucos Elementary School. The Cayucos Fringe is located within the Adelaida Planning Area.

The low coastal hills of the Cayucos Fringe feature several riparian corridors and a variety of native plant communities among ranching, farming and rural residential uses. Non-native grassland, riparian scrub/woodland and oak woodland communities predominate.

4.4 Consistency with Plans and Policies

The Estero Area Plan is part of the County's General Plan Land Use Element and its Local Coastal Plan. All elements of a general plan must be consistent. Data, assumptions and projections must be the same in each element of the plan.[12]

The following plans or other documents have relevance to the Proposed Estero Area Plan. They have been reviewed and compared to the contents of the Proposed Estero Area Plan. In most instances, policies enumerated are either consistent, too general to be inconsistent, or irrelevant to the update, and these are generally not discussed. The relevant plans and policies and areas of marked inconsistency are discussed in each section of the EIR. This does not constitute a detailed assessment of the adequacy of any of the general plan elements and related county ordinances and studies.

- Open Space Plan
- Safety Element
- Seismic Safety Element
- Clean Air Plan
- Parks and Recreation Master Plan
- Noise Element
- Highway One Corridor Study
- Solid Waste Management Plan
- Land Use Element and Local Coastal Plan, Framework for Planning
- San Luis Obispo County Department of Agriculture, Agricultural Preservation Policies
- Resource Management System

Also discussed is the consistency of the proposed Estero Area Plan with adopted policies of state and federal regulatory agencies, such as:

- California Coastal Act of 1976
- Regional Water Quality Control Board, Central Coast Basin Plan,

12 State of California Government Code 55300.5 (1981). *Sierra Club V. Board of Supervisors*, 126 Cal. App. 3d 698

- California Department of Fish and Game policies,
- U.S. Fish and Wildlife Service policies,
- California Endangered Species Act, and
- Federal Endangered Species Act.

Each resource section of the EIR contains a consistency discussion. In some sections, this is under a separate heading. In other instances, the consistency discussion is contained in the impact analysis section. The latter approach is taken where the plan discussed is central to the issue area.

5.0 Impact Sections

This section of the report examines the environmental issues for which the proposed area plan will or may have adverse impacts. Each issue contains four subsections.

Setting. This subsection describes the existing environmental conditions and regulatory structure affecting the planning area. This EIR attempts to describe both area-wide and community-specific settings, so that both large- and small-scale issues are brought to light.

Significance Thresholds. This subsection establishes thresholds by which a determination of significance will be made. Thresholds set quantitative or qualitative standards or criteria for a particular resource. These standards are then used to compare the environmental setting of the resource with and without the project impact to determine whether the impact is significant.[1] The thresholds used in this report are generally a combination of State CEQA Guidelines, expert opinion, and significance criteria established in other Area Plan EIR's and County documents (e.g., the Noise Element).

Proposed Project Impact Analysis. The "Area-wide" and "Community-specific" subsections evaluate the impacts of the proposed Area Plan buildout on the existing physical and regulatory environment. "Area-wide" analysis focuses on large-scale, general policy impacts, while the "Community-specific" section instead centers on specific issues facing the smaller communities, and the impact of area-specific policies and standards.

Special Policies, Programs & Standards. The Estero Area Plan contains numerous measures designed, in part, to reduce environmental impacts of the plan. Many of these measures were derived from the initial Constraints Analysis that was prepared prior to, and for the benefit of, the Area Plan update. Often the policies, programs and standards adequately reduce potential impacts of the Estero Area Plan. Where impacts will still occur, additional mitigation measures are proposed. **NOTE: modification or elimination of the policies cited in each impact section may modify the conclusions of this EIR.**

Mitigation Measures. Mitigation measures are additions to the project which aim to lessen or eliminate impacts as discussed above. Mitigation measures included in the following analysis generally attempt to be feasible and meaningful, and are constrained by the limited sphere of influence of the County of San Luis Obispo over private entities and incorporated cities.

Residual Impacts. This section describes the level of Area Plan impacts after implementation of the recommended mitigation measures.

Determination of Impacts at the Area Plan (or Programmatic) Level. It is important to note the difference between the analysis of impacts at the Area Plan, as opposed to project-specific, level. As the reader will notice, the assessment of significance of many of the potential impacts in the following sections is general in nature, and mitigation is often relegated to project-specific analysis at some later date. This is typical of a program-level EIR, which is legally allowed a more general discussion of impacts, alternatives and mitigation measures. The reader should keep in mind that this EIR is intended to act as a background report for future, more specific environmental assessment, and that discussion herein will be general in nature.

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1 Bass et.al., *CEQA Deskbook,* 2000 Edition.

5.1 Transportation & Circulation

This section assesses the potential impacts to transportation and circulation systems associated with buildout of the land uses recommended by the Estero Area Plan Update. The study area, scope of work and study methodologies used to prepare this section were determined based on input from staff of the County of San Luis Obispo Public Works and Planning Departments and Associated Transportation Engineers, Inc. (ATE).

The methodology for assessment of new trips was based on certain assumptions, particular to each of the three portions of the Estero planning area. In Cayucos, growth in traffic volumes over recent years has not exceeded one percent; this pattern of growth is not expected to change over the life of the Area Plan. Therefore, the one percent growth rate is applied to existing traffic levels on Cayucos roadways for a twenty-year time frame to yield the buildout traffic volumes. In the Rural Estero, growth on many of the roadways, except for Highway 1 and Highway 41, is expected to be negligible. Forecasts for Highways 1 and 41 were obtained from Caltrans and are considered inclusive of growth planned under the Area Plan. Forecasts for other roadways were obtained from analysis completed for the 2000 Estero Area Plan EIR. Projected traffic volumes for Los Osos were obtained from modeling performed for the Los Osos Circulation Study in 2002. Forecasts were also made which included the assumptions of the proposed Estero Area Plan. The analysis provides existing roadway levels of service as a baseline for assessing future conditions on the relevant street systems (although external traffic passing through the system is also included).

The analysis procedures used in this study to determine roadway operational levels are based on standard roadway design capacities. The methodology first establishes average daily traffic (ADT) volumes. In Cayucos and the Rural Estero, the methodology then assumes a 10% factor for peak hour trips and peak hour capacities, and establishes level of service based on peak hour trip assumptions. In Los Osos, detailed peak hour level of service analysis was performed for the Los Osos Circulation Study. The data provided in that study is incorporated by reference. Data relating to intersection operational levels were also obtained from the Los Osos Circulation Study[1].

Future travel demand increases can be minimized through the development and implementation of appropriate Transportation Demand Management (TDM) programs. The implementation of these programs can potentially result in a substantial reduction of both existing and future travel demands during peak commuter travel periods, as well as during off-peak periods. These reductions can, in turn, reduce or delay the need for physical transportation infrastructure improvements, such as the widening of roads. A discussion of the TDM programs which could potentially reduce future travel demands on the study-area roadway network is presented in this analysis.

5.1.1 Setting

5.1.1.1 Regulatory Setting

1. ***San Luis Obispo County General Plan*** -- Estero Area Plan Circulation Element (1996). The adopted Area Plan contains a Circulation Element which establishes goals, policies and programs to meet the transportation needs of all segments of the population of the Estero planning area. The Area Plan identifies specific roadway deficiencies, as well as improvements necessary to achieve and maintain an acceptable level of service on the transportation system through buildout of the Estero area.

The Circulation Element also contains roadway classifications which will be used in the analysis that follows:

1 *Los Osos Circulation Study* (2002); County of San Luis Obispo.

Principal arterials consist of freeways, expressways or other principal county roads that connect major population centers and other points of traffic generation. Access to principal arterials is strictly controlled; they are not intended for local trips. Within the Estero planning area, State Route 41 and State Highway 1 between the eastern planning area boundary and the western boundary of the Cayucos urban reserve line are considered principal arterials.

Arterials carry traffic between principal arterials and between population centers, or they may carry large volumes of traffic within urban or rural areas. They are not intended to provide primary access to residences and are best used for controlled access to areas of retail and service commercial uses, industrial facilities and major community facilities. Within the Estero Planning Area, Ocean Avenue in Cayucos is an example of an arterial within an urban area; Los Osos Valley Road is an example of an arterial in the Rural Area.

Collector roads enable traffic to move to and from local roads, arterial roads and activity centers. They are principal roads of residential areas and can carry relatively high volumes of traffic. Residential driveway access from collector roads should be limited according to traffic volumes, parcel sizes and sight distances. Ramona Avenue in the community of Los Osos is an example of a collector. Old Creek Road east of Cayucos is an example of a collector in the Rural Area.

Minor roads are used primarily for access to adjacent properties.

2. 2001 Regional Transportation Plan (RTP)[2]. The RTP examines a full range of transportation issues, opportunities and needs of the San Luis Obispo region. It also identifies the goals, objectives and policies to guide the identification and implementation of necessary future transportation improvements for all transportation modes (public transit, highways, streets and roads, bikeways, rail, harbor, aviation and pedestrian). The primary purpose of this plan is to guide the development of a coordinated and balanced transportation system that meets the basic transportation needs of all social groups, businesses and industries in the region. A secondary purpose of this plan is to satisfy federal and state requirements for a regional transportation plan and an ongoing regional planning process.

3. San Luis Obispo County Clean Air Plan (CAP)[3]. The CAP provides strategies designed to achieve and maintain state and federal ambient air quality standards. Land use and circulation management strategies outlined in the CAP include the implementation of transportation control measures (TCM) to achieve a substantial reduction in the growth rate of motor vehicle trips and vehicle miles traveled. A variety of TCM are presented in the CAP and are discussed in the TDM section of this analysis. Consistency with the CAP is addressed in Section 5.2.

4. County Bikeways Plan. The Bikeways Plan identifies bicycle circulation routes as well as bike path design and improvement standards.

5. California Coastal Act. The Coastal Act includes language guiding the provision of access.

> Section 30252, Maintenance and enhancement of coastal access.
>
> > The location and amount of new development should maintain and enhance public access to the coast by (1) facilitating the provision or extension of transit service, (2) providing commercial facilities within or adjoining residential development or in other areas that will minimize the use of coastal access roads, (3) providing nonautomobile circulation within the

2 *2001 Regional Transportation Plan;* San Luis Obispo Council of Governments

3 *Clean Air Plan San Luis Obispo County;* San Luis Obispo County Air Pollution Control District, 2001.

development, (4) providing adequate parking facilities or providing substitute means of serving the development with public transportation, (5) assuring the potential for public transit for high intensity uses such as high-rise office buildings, and by (6) assuring that the recreational needs of new residents will not overload nearby coastal recreation areas by correlating the amount of development with local park acquisition and development plans with the provision of onsite recreational facilities to serve the new development.

5.1.1.2 Existing Conditions

Motor vehicle traffic volumes are most often expressed in terms of Average Daily Traffic, or ADT, which is the number of vehicle trips passing a given point in each travel direction. In evaluating roadway operational conditions, "Level of Service" (LOS) A through F are applied, with LOS A indicating very good operating conditions and LOS F indicating poor conditions. According to information provided by staff at the County's Public Works Department, LOS C has been established as the minimum acceptable level of service for roadway segments within the rural area of the Estero planning area, and LOS D within urban areas. The cusp of LOS C/D is considered the minimum acceptable level on Caltrans facilities.

a. Rural Estero

The rural portion of the Estero planning area is served primarily by State Route 1 (S.R. 1), State Route 41 (S.R. 41) and a network of arterial streets. The following is a brief description of the principal roadway segments serving the rural portions of the Estero planning area.

1. Existing Street Network. The following text describes the major roads in Rural Estero.

State Route 1 is a regional State Highway facility which extends on a south-east to north-west alignment from its junction with U.S. Highway 101 in the City of San Luis Obispo to the San Luis Obispo/Monterey County line and beyond. The segment of S.R. 1 between the western outskirts of San Luis Obispo through the Cayucos area is a divided four-lane highway, while the segment north of this point is predominately a two-lane coastal highway. State Route 1 is also the State's designated coastal bike route.

State Route 41 is a State Highway facility with two travel lanes between U.S. Highway 101 (junction at Atascadero) and S.R. 1. This section of S.R. 41 passes through mountainous terrain and primarily serves local and recreational traffic.

Old Creek Road extends easterly from an "at-grade" intersection with S.R. 1 in the Cayucos area to and beyond S.R. 46 to the north. This two-lane road serves the residential uses in the Cayucos area and the agricultural area east of Cayucos.

South Bay Boulevard is a two-lane arterial which traverses Morro Bay State Park and connects the City of Morro Bay with the community of Los Osos. While the speed limit of South Bay Boulevard is posted at 55 mph north of the Los Osos area, this roadway segment is narrow and curvilinear. South Bay Boulevard is a designated County bikeway.

Pecho Valley Road connects Los Osos Valley Road with Montana de Oro State Park to the south. This two-lane road runs north-south and serves the residential neighborhoods to the east and west. Outside the Los Osos urban reserve line, Pecho Valley Road is a two-lane collector street.

Los Osos Valley Road, the segment east of the community of Los Osos, is a two-lane arterial which traverses the agricultural lands between Los Osos and San Luis Obispo. There are two passing lanes of about one mile in length, approximately midway within this segment and one in each direction. This is a designated County bikeway.

2. Existing Traffic Volumes and Levels of Service. Existing ADT volumes for the street network serving the rural area of the Estero planning area were obtained from the County's traffic count manual and Regional

Transportation Plan (RTP). Table 5.1-1 displays the existing ADT volumes and corresponding levels of service for the study-area street segments serving the rural area of the Estero planning area.

The data presented in Table 5.1-1 indicate that the majority of the study street segments currently operate at acceptable levels of service (LOS C or better), except for the segment of South Bay Boulevard between State Park Road and Turri Rd. The adverse levels of service along this street segment may indicate congested operations during peak travel time periods.

Table 5.1-1: Rural Estero - Existing Roadway Levels of Service

Roadway Segment	Roadway Classification	Capacity (ADT)	Existing ADT	PM Peak Hour (2-way volume)	LOS
S.R. 1, north Morro Bay to north of Cayucos	4-Lane Arterial	35,900	16,700	1,670	A
Creek Road					
S.R. 1, Morro Bay	4-Lane Arterial	35,900	24,500	2,450	B
S.R. 41, east of S.R. 1	2-Lane Arterial	18,000	8,800	880	A
Old Creek Rd, east of Richard Ave	2-Lane Collector	14,400	1,441	144	A
South Bay Blvd, State Park Road - Turri Rd (a)	2-Lane Arterial	16,000	16,505	1,500	E
Turri Rd, N/O LOVR	2-Lane Collector	14,400	435	44	A
Los Osos Valley Rd, east of Los Osos Creek	2-Lane Arterial	18,000	14,539	1,400	C

(a) Reduced capacity to account for narrow roadway width and curved alignment.
Source: County of San Luis Obispo Public Works Department, *Traffic Volumes*, May, 2003
http://www.slocog.org/reports/2001_RTP_north_coast_profiles.pdf

b. Cayucos Area

1. Existing Street Network. Regional access to the Cayucos community is provided by S.R. 1, while local access within the northern and southern section of Cayucos is provided by a grid street system. The streets within the Cayucos area serve mostly residential land uses. Design characteristics are typical of rural local collector streets, with narrow pavement widths (24 feet or less), unpaved shoulders, and on-street parking. The following text provides a brief description of the primary roadway segments within the area.

State Route 1 is a State Highway facility which provides regional access to the Cayucos community. Access between the northern Cayucos street system and S.R. 1 is provided via an "at-grade" intersection at North Ocean Avenue, a diamond interchange at Cayucos Drive, a partial diamond interchange at 13th Street (access to and from the south only), and an "at-grade" intersection at Cass Avenue. Access between the southern Cayucos street system and S.R. 1 is provided via "at-grade" intersections at Old Creek Road-Studio Drive and Ocean Boulevard-Chaney Avenue. S.R. 1 is the state's designated coastal bicycle route.

Cayucos Drive has two travel lanes and is the primary north-south collector within the northern Cayucos area. Cayucos Drive has design characteristics typical of a collector street with on-street parking. There is essentially no curb, gutter and sidewalk provided along the segment north of Ocean Avenue.

Ocean Avenue is a two-lane roadway that runs east-west within the northern Cayucos area. North Ocean Avenue extends from S.R. 1 on the north to E Street, while the roadway continues as South Ocean Avenue from E Street to S.R. 1 on the south. Design characteristics are typical of a collector street with direct access provided for residential and commercial land uses. On-street parking (angled) is provided west of E Street in the downtown commercial area and bike lanes are present on the segment south of the downtown.

Pacific Avenue is a two-lane roadway that runs parallel to the Pacific Ocean within the northern Cayucos area. This roadway serves the residential land uses along its length.

Old Creek Road extends easterly from an "at-grade" intersection with S.R. 1 in the Cayucos area. This two-lane road serves the residential uses within the southern Cayucos area and extends to the agricultural area east of Cayucos.

Ocean Boulevard is a frontage road which parallels the east side of S.R. 1 within the southern Cayucos area. This two-lane roadway serves predominately residential uses.

Studio Drive is a two-lane roadway that parallels the Pacific Ocean within the southern Cayucos area, serving the residential uses along its length.

2. Existing Volumes and Levels of Service. Existing ADT volumes for the street network serving Cayucos were obtained from the County, SLOCOG and Caltrans. Table 5.1-2 displays the existing ADT volumes and corresponding levels of service for the study-area street segments serving the Cayucos community.

Table 5.1-2: Cayucos Community - Existing Roadway Levels of Service

Roadway Segment	Roadway Classification	Capacity (ADT)	Existing ADT	PM Peak Hour (2-way volume)	LOS
S.R. 1, north Morro Bay to north of Cayucos Creek Road	4-Lane Arterial	35,900	16,700	1,670	A
Cayucos Dr, south of S.R. 1	2-Lane Collector	14,400	2,062	206	A
North Ocean Ave, north end @ Hwy 1	2-Lane Collector	14,400	2,068	207	A
South Ocean Ave, north of 13th St	2-Lane Collector	14,400	5,750	575	A
Pacific Ave, north of 13th St	2-Lane Collector	14,400	1,330	133	A
Old Creek Rd, east Ocean Blvd	2-Lane Collector	14,400	3,110	311	A
Ocean Blvd, north of Old Creek Rd	2-Lane Collector	14,400	864	86	A
Ocean Blvd, south of Old Creek Rd	2-Lane Collector	14,400	1,038	104	A
Studio Drive, west of S.R. 1	2-Lane Collector	14,400	510	51	A

Sources: County of San Luis Obispo Public Works Department, *Traffic Volumes,* May 2003
http://www.slocog.org/reports/2001_RTP_north_coast_profiles.pdf

The data presented in Table 5.1-2 indicate that all of the study street segments within the Cayucos community currently operate at an acceptable level of service (LOS A).

c. Los Osos Area

1. Existing Street Network. Regional access to the Los Osos community is provided by South Bay Boulevard and Los Osos Valley Road. Local access within the area is provided by a grid street system comprised of collector and local streets. The design character of the streets within the grid system is rural in nature, with narrow pavement widths (24 feet or less), unpaved shoulders, and on-street parking. The following text provides a brief description of the primary roadway segments within the Los Osos community study area.

South Bay Boulevard is a north-south road that extends north from Los Osos Valley Road. This roadway is classified as a two-lane arterial and has paved shoulders on both sides of the street. Traffic signals control the intersections of South Bay Boulevard at both Santa Ysabel Avenue and Los Osos Valley Road. North of the Los Osos area, the roadway continues through Morro Bay State Park and eventually connects to S.R. 1.

Los Osos Valley Road is a four-lane east-west arterial partially improved with curb, gutter and sidewalk on both sides of the street between Los Osos Creek on the east and Ninth Street on the west. Traffic signals control the Los Osos Valley Road intersections at South Bay Boulevard, Doris Avenue, Ninth Street, and Tenth Street. West of Ninth Street the roadway continues as a two-lane arterial with paved shoulders. Roadway improvements were installed in front of Monarch Grove Elementary School. Further west, the roadway becomes Pecho Valley Road and continues as a two-lane collector road to Montana De Oro State Park.

Santa Ysabel Avenue is a two-lane collector street which extends in an east-west direction from Second Street to its terminus east of South Bay Boulevard; the portion west of South Bay Boulevard is a collector. Class II bike lanes are provided on both sides of the street from Second Street to South Bay Boulevard.

Ramona Avenue is also a two-lane collector street, extending in an east-west direction between Pine Avenue on the west and Seventeenth Street on the east. Between Tenth and Eleventh Streets, and east of 15th Street, the roadway is currently unpaved.

Nipomo Avenue is a two-lane collector street which extends in an east-west direction from Seventh Street on the west to Andre Avenue east of South Bay Boulevard.

Pine Avenue is a two-lane north-south collector street extending between Los Osos Valley Road and Ramona Avenue. Bike lanes are provided on both sides of the street.

Seventh Street extends in a north-south direction between Ramona Avenue on the south and Santa Ysabel Avenue on the north. This two-lane collector street is partially improved between Nipomo Avenue and San Luis Avenue.

Ninth Street, a north-south two-lane collector street, extends between Ramona Avenue on the north and Los Osos Valley Road on the south. The roadway continues as Bayview Heights Drive south of Los Osos Valley Road.

Eleventh Street is a north-south two-lane street designated as a collector north of Los Olivos Avenue. North of Santa Ysabel Avenue, Eleventh Street transitions to a local street.

2. Existing Volumes and Levels of Service. Existing ADT volumes for the study street segments serving the Los Osos urban area were obtained from the County. Table 5.1-3 displays the existing ADT volumes and corresponding levels of service for the study-area street segments serving the Los Osos community.

Table 5.1-3: Los Osos Urban Area - Existing Roadway Levels of Service

Roadway Segment	Roadway Classification	Capacity (ADT)	Existing ADT	PM Peak Hour (2-way volume)	LOS
South Bay Blvd., south of Santa Ysabel Ave.	2-Lane Arterial	18,000	9,940	1,000	D
South Bay Blvd., north of Los Osos Valley Rd.	2-Lane Arterial	18,000	11,920	1,200	D
Los Osos Valley Rd., west of Doris Ave.	2-Lane Arterial	18,000	5,370	550	C
Los Osos Valley Rd., west of Ninth St. (a)	2-Lane Arterial	16,000	11,910	1,200	E
Los Osos Valley Rd., west of South Bay Blvd.	4-Lane Arterial	35,900	17,280	1,700	C
Los Osos Valley Rd., east of South Bay Blvd.	4-Lane Arterial	35,900	16,350	1,600	C
Santa Ysabel Ave., east of Seventh St.	2-Lane Collector	14,400	3,850	400	C
Santa Ysabel Ave., west of South Bay Blvd.	2-Lane Collector	14,400	7,480	750	D
Ramona Ave., west of Fourth St.	2-Lane Collector	14,400	2,720	300	C
Nipomo Ave., west of South Bay Blvd.	2-Lane Collector	14,400	2,600	300	C
Pine Ave., north of Los Osos Valley Rd.	2-Lane Collector	14,400	2,660	300	C
Ninth St., north of Los Osos Valley Road	2-Lane Collector	14,400	6,650	700	C
Bayview Heights Drive, south of Los Osos Valley Rd.	2-Lane Collector	14,400	2,270	200	B

(a) Reduced capacity due to narrow width and side friction between Ninth Street and Pine Avenue.
Source: *Los Osos Circulation Study*, County of San Luis Obispo, 2002

LOS D is the Board of Supervisors policy for the minimum acceptable level of service standard for roadway segments located within urban areas. The data presented in Table 5.1-3 indicate that most of the study street segments within the Los Osos community currently operate at acceptable levels of service (LOS D or better). Los Osos Valley Road west of Ninth Street is currently operating at LOS E during peak travel hours. This condition results from the reduced road capacity due to narrow width and side friction between Ninth Street and Pine Avenue. Side friction refers to traffic movements to and from driveways, pedestrians, bicycles, roadside features such as ditches, curved alignments, etc. Side friction can reduce the carrying capacity of roadways.

3. Existing Intersection Operations. Several intersections within the Los Osos community are controlled by traffic signals. These locations are where traffic flows become restricted, especially during peak travel periods. The level of service grading system previously discussed for roadway operations is also used in rating intersection operations (with LOS A indicating very good conditions and LOS F indicating poor conditions).

The Board of Supervisors has established LOS C as the minimum acceptable level of service for the signalized intersections within the Los Osos community. Table 5.1-4 lists the existing P.M. peak hour level of service for the signalized intersections in the Los Osos area, as contained in the Los Osos Circulation Study.

Table 5.1-4: Los Osos Community - Existing Intersection Levels of Service

Intersection	Existing Level of Service
Santa Ysabel Ave/South Bay Blvd	B
Santa Ysabel Ave/11th	A
Santa Ysabel Ave/7th	A
Los Osos Valley Rd/9th St	A
Los Osos Valley Rd/10th St	B
Los Osos Valley Rd/South Bay Blvd	B
Los Osos Valley Rd/Doris Avenue	B
Los Osos Valley Rd/Palisades	A
Los Osos Valley Rd/Ravenna	A
Los Osos Valley Rd/Pine	A
South Bay/Nipomo	A
South Bay/Pismo	A
South Bay/El Moro	B
Ramona/4th	A
Ramona/7th	A

Source: *Los Osos Circulation Study* (2002). County of San Luis Obispo;

As shown in Table 5.1-4, the signalized intersections within the Los Osos community currently operate at LOS A or B, which are considered acceptable.

5.1.2 Significance Thresholds

The Board of Supervisors has established LOS D as the minimum acceptable level of service standard for roadway segments located within urban areas, and LOS C as the minimum for rural areas. For signalized intersections, the Board of Supervisors has established LOS C as the acceptable level of service. A significant adverse impact on transportation and circulation would occur if buildout in accordance with the land uses recommended by of the Estero Area could result in the reduction of levels of service below these thresholds.

Methodology

For the Cayucos area, a one percent annual increase in ADT was considered very conservative and consistent with typical County Public Works assumptions. Increases in the Rural Estero were based on information provided by Caltrans for the major roadways Highways 1 and 41, while projections for other minor roadways were based on previous study in the 2000 EIR or modeling performed for the Los Osos Circulation Study. Projections for Los Osos were based on modeling performed for the Los Osos Circulation Study, altered to include land use assumptions for the proposed Estero Area Plan. Projections for Los Osos include a future scenario with no roadway improvements, and a future scenario with proposed roadway improvements. Modeling performed for Los Osos included assumptions for regional trips, thereby accounting for growth in other areas. The roadway improvements proposed are listed in Table 5.1-10.

5.1.3 Proposed Project Impacts and Mitigation Measures

5.1.3.1 Rural Estero

Table 5.1-5: Rural Estero - Future Roadway Levels of Service

Roadway Segment	Roadway Classification	Capacity (ADT)	Existing ADT	Future ADT	PM Peak Hour (2-way volume)	LOS
S.R. 1, north Morro Bay to Cayucos Creek Road	4-Lane Arterial	35,900	16,700	18,600	1,860	A
S.R. 1, Morro Bay	4-Lane Arterial	35,900	24,500	33,500	3,350	E
S.R. 41, east of S.R. 1	2-Lane Arterial	18,000	8,800	12,600	1,260	B
Old Creek Rd, east of Richard Ave	2-Lane Collector	14,400	1,441	1,760	176	A
South Bay Blvd, State Park Road - Turri Rd (a)	2-Lane Arterial	16,000	16,505	30,400	3,040	F
Turri Rd, east of South Bay Blvd	2-Lane Collector	14,400	435	N/A	N/A	N/A
Los Osos Valley Rd, east of Los Osos Creek	2-Lane Arterial	18,000	14,539	27,100	2,200	C

(a) Reduced capacity to account for existing roadway characteristics.
Source: Caltrans, Don Morehouse and Keith Heinrickson, pers. comm. 7/30/03
Los Osos Circulation Study, Estero Area Plan model run, 2002.

Impact TC-1: The data listed in Table 5.1-5 indicate that South Bay Boulevard between State Park Road and Turri Road is projected to operate at LOS F. State Route 1 through Morro Bay is expected to operate at LOS E. Traffic on South Bay Boulevard is primarily comprised of commuter traffic traveling between Morro Bay and Los Osos and recreational traffic traveling to and from Morro Bay State Park.

Implementation of the proposed Area Plan would result in unacceptable levels of service for two particular roadway segments in Rural Estero. South Bay Boulevard between State Park Road and Turri Road and State Route 1 through Morro Bay are projected to operate unacceptably at LOS F and E, respectively, as shown in Table 5.1-5. Traffic on this segment of South Bay Boulevard is primarily comprised of commuter traffic traveling between Morro Bay and Los Osos and recreational traffic traveling to and from the Morro Bay State Park. Projected levels of service ~~are unacceptable~~ exceed level of service D; therefore, this impact is considered significant.

Improvements proposed by the County in the Estero Area Plan and Los Osos Circulation Study would ~~change~~ improve the LOS for the segment of this roadway south of Turri Road, however, they would not ~~change~~ improve the LOS for the segment north ~~at~~ to Morro Bay. The portion of South Bay Boulevard projected to exceed acceptable levels of service would require capacity enhancing improvements to accommodate buildout traffic volumes. This section of roadway lies within the City of Morro Bay and/or state property and is therefore not under the jurisdiction of the County. Impacts are considered significant and unavoidable.

Caltrans is in the process of studying and planning for needed improvements to Highway 1. Strategies for improvement of conditions on this roadway would be developed on a regional scale. The project's contribution to traffic on this roadway is considered a significant and unavoidable impact.

Since both roadways in question act as major points of access to the coast, deficient LOS may also affect coastal access, to the extent that traffic may hamper ease of access. However, this impact is considered less than significant because deficient levels of service are experienced at peak hours, during which times recreational travel is expected to be lower.

Implementation and operation of successful TDM programs could produce substantial reductions in ~~the number of~~ trips generat~~ioned resulting from~~ by buildout in the planning area and the City of Morro Bay (in the range of 5-15%). TDM measures alone will not reduce the impacts of buildout ADT volumes to a less than significant level. A TDM program should be developed in conjunction with capacity enhancing roadway improvements.

5.1.3.2 Cayucos Area

The County has stated that a one percent or less annual growth rate is more than adequate to project traffic volumes in Cayucos[4]. The exception is traffic volumes on Highway 1, which are forecast by Caltrans. Based on these daily traffic volume forecasts, the roadway LOS were calculated assuming existing capacities. The results of this analysis are presented in Table 5.1-6.

Table 5.1-6: Cayucos Community - Future Roadway Levels of Service

Roadway Segment	Roadway Classification	Capacity (ADT)	Existing ADT/LOS	Future ADT/LOS	PM Peak Hour (2-way volume)	LOS
S.R. 1, north Morro Bay to north of Cayucos Creek Road	4-Lane Arterial	35,900	16,700/A	18,600/A	1,860	A
Cayucos Dr, south of S.R. 1	2-Lane Collector	14,400	2,062/A	2,520/A	252	A
North Ocean Ave, north end at Hwy 1	2-Lane Collector	14,400	2,068/A	2,525/A	253	A
South Ocean Ave, north of 13th St	2-Lane Collector	14,400	5,750/A	7,025/A	703	A
Pacific Ave, north of 13th St	2-Lane Collector	14,400	1,330/A	1,625/A	163	A
Old Creek Rd, east Ocean Blvd	2-Lane Collector	14,400	3,110/A	3,800/A	380	A
Ocean Blvd, north of Old Creek Rd	2-Lane Collector	14,400	864/A	1,055/A	106	A
Ocean Blvd, south of Old Creek Rd	2-Lane Collector	14,400	1,038/A	1,270/A	127	A
Studio Drive, west of S.R. 1	2-Lane Collector	14,400	510/A	625/A	63	A

Sources: County of San Luis Obispo Engineering Department, *Traffic Volumes,* May 2003

Impact TC-2: Increases in Traffic on Cayucos Roadways Resulting from Buildout are Less than Significant.

Implementation of the proposed Area Plan would not result in substantial adverse effects to traffic volumes or LOS levels for Cayucos roadways and would therefore not result in substantial adverse effects to coastal access. As shown in Table 5.1-6, roadway segments within the Cayucos area would continue to operate at acceptable levels of service (LOS C or better) with increases in traffic volumes at buildout. Therefore, this impact is considered less than significant.

[4] Dave Flynn. Personal Communication.

5.1.3.3 Los Osos Area

Projections for Los Osos were based on modeling performed for the Los Osos Circulation Study, altered to include land use assumptions for the proposed Estero Area Plan. Projections for Los Osos include a future scenario with no roadway improvements, and a future scenario with proposed roadway improvements. Modeling performed for Los Osos included assumptions for regional trips, thereby accounting for growth in other areas. The results of the model without improvements and with improvements are outlined in Tables 5.1-7 and 5.1-8.

Table 5.1-7: Los Osos - Future Roadway Levels of Service - Without Improvements

Roadway Segment	Roadway Classification	Capacity (ADT)	Existing ADT/LOS	Future ADT	Future PM Peak Hour (2-way volume)	Future LOS
South Bay Blvd., south of Santa Ysabel	2-Lane Arterial	18,000	9,940/D	17,900	2,000	E
South Bay Blvd., north of Los Osos Valley Rd.	2-Lane Arterial	18,000	11,920/D	18,100	1,800	E
Los Osos Valley Rd., west of Doris Ave.	2-Lane Arterial	18,000	5,370/C	10,900	800	D
Los Osos Valley Rd., west of Ninth St. (a)	2-Lane Arterial	16,000	11,910/E	16,300	1,400	E
Los Osos Valley Rd., west of South Bay Blvd.	4-Lane Arterial	35,900	17,280/C	29,800	2,200	C
Los Osos Valley Rd., east of South Bay Blvd.	4-Lane Arterial	35,900	16,350/C	28,900	2,300	C
Santa Ysabel Ave., east of Seventh St.	2-Lane Collector	14,400	3,850/C	7,100	500	C
Santa Ysabel Ave., west of South Bay Blvd.	2-Lane Collector	14,400	7,480/D	13,800	1,000	E
Ramona Ave., west of Fourth St.	2-Lane Collector	14,400	2,720/C	5,800	400	C
Nipomo Ave., west of South Bay Blvd.	2-Lane Collector	14,400	2,600/C	5,100	400	C
Pine Ave., north of Los Osos Valley Rd.	2-Lane Collector	14,400	2,660/C	4,400	300	C
Ninth St., north of Los Osos Valley Rd.	2-Lane Collector	14,400	6,650/C	10,700	600	D
Bayview Heights Drive, south of Los Osos Valley Rd.	2-Lane Collector	14,400	2,270/B	4,400	300	B

(a) Reduced capacity due to narrow width and side friction between Ninth Street and Pine Avenue.

Source: Los Osos Circulation Study, County of San Luis Obispo, 2002

Table 5.1-8: Los Osos - Future Roadway Levels of Service - With Improvements

Roadway Segment	Roadway Classification	Capacity (ADT)	Existing ADT/LOS	Future ADT	Future LOS
South Bay Blvd., south of Santa Ysabel	2-Lane Arterial	18,000	9,940/D	22,344	B/C
South Bay Blvd., north of Los Osos Valley Rd.	2-Lane Arterial	18,000	11,920/D	18,653	B/C
Los Osos Valley Rd., west of Doris Ave.	2-Lane Arterial	18,000	5,370/C	11,061	C/D
Los Osos Valley Rd., west of Ninth St. (a)	2-Lane Arterial	16,000	11,910/E	16,548	C/D
Los Osos Valley Rd., west of South Bay Blvd.	4-Lane Arterial	35,900	17,280/C	29,175	C
Los Osos Valley Rd., east of South Bay Blvd.	4-Lane Arterial	35,900	16,350/C	28,586	C
Santa Ysabel Ave., east of Seventh St.	2-Lane Collector	14,400	3,850/C	3,281	C
Santa Ysabel Ave., west of South Bay Blvd.	2-Lane Collector	14,400	7,480/D	8,170	C
Ramona Ave., west of Fourth St.	2-Lane Collector	14,400	2,720/C	5,446	C
Nipomo Ave., west of South Bay Blvd.	2-Lane Collector	14,400	2,660/C	4,171	C
Pine Ave., north of Los Osos Valley Rd.	2-Lane Collector	14,400	2,660/C	4,027	C
Ninth St., north of Los Osos Valley Rd.	2-Lane Collector	14,400	6,650/C	11,089	D
Bayview Heights Drive, south of Los Osos Valley Rd.	2-Lane Collector	14,400	2,270/B	3,628	B

(a) Reduced capacity due to narrow width and side friction between Ninth Street and Pine Avenue.

Source: Los Osos Circulation Study, County of San Luis Obispo, 2002

Table 5.1-9: Los Osos - Future Intersection Levels of Service with no Improvements

Intersection	Existing LOS	Future LOS
Santa Ysabel Ave/South Bay Blvd	B	F
Santa Ysabel Ave/11th	A	D
Santa Ysabel Ave/7th	A	A
Los Osos Valley Rd/9th St	A	B
Los Osos Valley Rd/10th St	B	B
Los Osos Valley Rd/South Bay Blvd	B	C*
Los Osos Valley Rd/Doris Avenue	B	B
Los Osos Valley Rd/Palisades	A	B
Los Osos Valley Rd/Ravenna	A	F
Los Osos Valley Rd/Pine	A	F
South Bay/Nipomo	A	F
South Bay/Pismo	A	F
South Bay/El Moro	B	F
Ramona/4th	A	A
Ramona/7th	A	A

Source: Los Osos Circulation Study, 2002.
* Left turn pocket onto LOVR will operate at LOS E

Impact TC-3: Increases in Traffic on Los Osos Roadways and Impacts to Intersections Resulting from Buildout.

~~Projected roadway operations are expected to exceed acceptable levels of service on Santa Ysabel west of South Bay Boulevard. No feasible mitigation exists for this roadway. This impact is considered significant and unavoidable (Class I).~~

Projected roadway operations are expected to exceed acceptable levels of service on Santa Ysabel west of South Bay Boulevard under the "no improvement" scenario. Implementation of improvements identified in the Los Osos Circulation Study, particularly the extension of roadways through to Santa Ysabel, will alleviate traffic on the roadway such that acceptable levels of service would be attainable. Impacts are considered less than significant because of mitigation included in the Area Plan.

All other roadways are expected to operate within acceptable levels when proposed improvements are considered. Impacts are less than significant.

Roadways in Los Osos providing direct coastal access are expected to operate within acceptable levels; therefore impacts to coastal access are considered less than significant. Implementation of the area plan may improve coastal access opportunities by improving access points and providing more roadway connections from major roadways to the waterfront.

Unacceptable levels of service are expected at several intersections in the Los Osos area at buildout, as outlined in Table 5.1-9 above. The Area Plan and Los Osos Circulation Study contain measures to ensure acceptable levels of service. Impacts are therefore considered significant, but mitigable. Recommended improvements and resulting LOS are outlined in Table 5.1-11.

Impact TC-4: Emergency Evacuation Routes Serving the Planning Area Could Be Congested During the PM Peak Hour.

In accordance with regulations established by the Nuclear Regulatory Commission, an evacuation plan has been prepared (Korve Engineers) for areas that could be affected by an accident at Pacific Gas and Electric Company's Diablo Canyon Nuclear Power Plant (DCNPP). The power plant is located along the south-facing coastline between Point Buchon and Point San Luis just south of the Estero planning area. Buildout of the planning area in accordance with the Draft Area Plan will result in more residents living in the area and more traffic on surrounding roadways.

South Bay Boulevard and Los Osos Valley Road would be the primary evacuation points for an emergency in the Los Osos area. Since these roads also serve as primary evacuation routes, an emergency evacuation occurring during the afternoon peak hour would be hampered by traffic already on the roadway system. It should be noted, however, that a power plant accident that would require a large-scale evacuation of the planning area is unlikely. It is even more unlikely that an emergency that required a large-scale evacuation of the area would occur during the afternoon peak traffic hour. Nonetheless, it is a potentially significant adverse impact that is unavoidable and adverse (Class I).

Impact TC-5: Consistency with Section 30252 of the Coastal Act.

NOTE: Issues associated with coastal access are also considered under community-specific LOS impacts. The following specific discussion has been added in response to comments received from the Coastal Commission (see Appendices).

Consistency with Section 30252 of the Coastal Act can be addressed by answering the following questions:

Does the project:

(1) Facilitate the provision or extension of transit service?

Area plan response: Information regarding transit service enhancements is detailed in the TDM portion of this chapter, and in Chapter 5 of the proposed plan. The plan includes a number of policies and programs aimed at the facilitation of transit service.

(2) Provide commercial facilities within or adjoining residential development or in other areas that will minimize the use of coastal access roads?

Area plan response: New commercial facilities under the proposed plan are concentrated in portions of the planning area which currently support commercial uses. In Cayucos, new commercial use is concentrated in the existing commercial core along Ocean Boulevard. In Los Osos, commercial development potential is located in two primary areas; the existing commercial centers along Los Osos Valley Road and the Baywood Park commercial area.

In Cayucos, commercial development will be sited along the major roadway in the community, which is also the major route for coastal access. However, the plan does not designate land such that coastal access would be obstructed, and would not generate vehicular traffic which would hamper use of access points (see Impact discussion herein). By concentrating commercial development in areas with existing commercial uses, and by reserving areas with direct coastal access points for other uses, the Plan minimizes use of coastal access roads.

In Los Osos, coastal access is provided by developed access points in Baywood Park, and a number of local roadways. The plan does not designate land for commercial use such that coastal access would be obstructed.

(3) Provide nonautomobile circulation within the development?

Area plan response: Chapter 5 also includes policies and programs intended to facilitate the provision of facilities for bicycles and pedestrians and/or require such facilities as part of new development.

(4) Provide adequate parking facilities or providing substitute means of serving the development with public transportation?

Area plan response: The proposed Area Plan contains policies and programs intended to provide adequate parking while also proposing improvements to public transportation modes, as detailed in Chapter 5.

(5) Assure the potential for public transit for high intensity uses such as high-rise office buildings?

Area plan response: The plan does not provide for high intensity uses such as high-rise office buildings.

(6) Assure that the recreational needs of new residents will not overload nearby coastal recreation areas by correlating the amount of development with local park acquisition and development plans with the provision of onsite recreational facilities to serve the new development.

Area plan response: The provision of park space is addressed in Section 5.7.

The plan is considered consistent with this Section of the Coastal Act. Coastal access in general is addressed in greater detail in Chapter 8 of the proposed Plan.

5.1.3.4 Area Plan Response

The proposed Estero Area Plan update recommends roadway and intersection improvements to address existing and future traffic congestion problems that would arise through buildout in accordance with the recommended land uses. Many of these recommended improvements and programs were derived from the *Los Osos Circulation Study* prepared in 2002 and incorporated herein by this reference. In addition to addressing vehicular circulation improvements (motor vehicles as well as bicycles) the programs and improvements recommended by the Area Plan include measures to reduce the total number of vehicle trips through the use of transit and other modes of transportation. Many of these provide mitigation to impacts that could result from development under the Estero Area Plan. **NOTE: subsequent modification or elimination of the policies cited in this section may modify the conclusions of this EIR.**

As indicated by the previous analysis, roadways and intersections in Rural Estero and the community of Cayucos are expected to continue to operate at acceptable levels of service through buildout of the proposed Area Plan, with the exception of South Bay Boulevard between State Park Road and Turri Road, ~~Santa Ysabel west of South Bay Boulevard~~ and Highway 1 through Morro Bay. A number of improvements are recommended to achieve and maintain acceptable levels of service and to address existing roadway and safety problems within the community of Los Osos and elsewhere in the planning area. The primary improvements are summarized below. A more complete description of all of the recommended improvements is provided in the Estero Area Plan update and the *Los Osos Circulation Study.*

Table 5.1-10: Recommended Roadway Improvements

Roadway	Recommended Improvements	Comment
Community of Los Osos		
South Bay Boulevard north of Santa Ysabel	Provide two 12-foot travel lanes and two 8-foot shoulders; provide Class II bike lanes on both sides; extend to the south and west to connect to Cabrillo Estates and to Pecho Valley Road.	Deleted from previous study
	Create a four-lane road between Los Osos Valley Road and Nipomo Ave raising the LOS to B or C depending on signal improvements	This project is necessary to make the signal operate at an acceptable LOS.
	Create a four-lane road between Nipomo Ave. and El Moro Ave. raising the LOS to B or C depending on signal improvements.	
	Create a four-land road between El Moro Ave. and Santa Ysabel Ave. raising the LOS to B or C depending on signal improvements.	This project is necessary to make the signal operate at an acceptable LOS.
	Create a four-lane road from Santa Ysabel Ave. to northern study cordon raising the LOS to B or C depending on signal improvements.	This project is necessary to make the signal operate at an acceptable LOS.
Los Osos Valley Road	Install Class I bike path on north side of right-of-way between Montana de Oro State Park and Palisades Avenue;	This two-way left turn land between Ninth and Bush is being recommended as a top priority since the corridor is already operating at an insufficient LOS, the grades need to be established for the proposed signal at Palisades Avenue and the sewer treatment plant road improvements, as well as address the chronic drainage issues at this location.
	Add a two way left turn lane to the roadway between Bush Street and Palisades Avenue raising the LOS to C or D depending on signal improvements	
	Add a two way left turn lane to the roadway between Palisades Avenue And Doris Avenue raising the LOS to C or D depending on signal improvements.	
	Add a two way left turn lane to the roadway between Ninth Street and Bush Street raising the LOS to C or D depending on signal improvements.	

Roadway	Recommended Improvements	Comment
Ravenna Avenue	Extend north from LOVR to Ramona Avenue at Fourth Street as development occurs in the vicinity.	This will provide a much needed north-south link between Los Osos Valley Road and the Baywood Park area. Final alignment will need to consider impacts to sensitive wetlands.
Highland Drive	Extend west to provide pedestrian, bicycle and equestrian and emergency vehicle access to Pecho Valley Road.	Do not provide public vehicular access, but accommodate public pedestrian, bicycle and equestrian travel.
Doris Avenue	Extend northward from Rosina to South Court; provide pedestrian path.	Is intended to improve safe access to Monarch Grove School.
Skyline Drive	Complete Skyline Drive between Doris and Pine Avenues then extend the street eastward to Palisades Avenue. Ultimately extend the street from Palisades Avenue eastward to Nipomo Avenue at 7th Street when development occurs in that area.	No improvements are proposed for Morro Palisades because the area has been placed under conservation.
Ramona Avenue	Complete between 10th Street and South Bay Boulevard after re-alignment of the Ramona Avenue/4th Street intersection.	The street will serve as an east-west collector serving much of the area north of Los Osos Valley Road.
Fairchild Way	Extend to Nipomo Avenue	
Traffic Calming	Implement traffic calming strategies in various locations throughout Los Osos where appropriate	The Public Works Department is pursuing enhancements such as Santa Ysabel Traffic Calming on a case by case basis. The Department will be developing a countywide guideline that will be approved through the Board of Supervisors. This guideline will be applied to the individual cases.
Rural Estero		
State Highway 1	Install one passing lane in each direction W of Cayucos; each passing lane should be no greater than 1 mile in length, consistent with the statute that requires Hwy 1 to remain a two-lane scenic road in rural areas	
State Highway 41	Install passing lanes and channelization east of Morro Bay	
Community of Cayucos		
Ocean Avenue	Install sidewalks in the central business district as development occurs; add bicycle lanes	

Table 5.1-11: Recommended Intersection Improvements

Intersection	Recommended Improvements
LOVR and Palisades Avenue	Signalize; After signalizing, intersection will operate at LOS B.
LOVR and Pine	Signalize; Also add southbound left turn pocket.
LOVR and Ravenna	Signalize; Also add westbound left turn pocket. Intersection will operate at LOS A.
LOVR and South Bay Boulevard	Add a dual left turn lane to the southbound left movement. Intersection will operate at LOS B.
Ramona Avenue and Ravenna/3rd/4th	Improve alignment
Ramona and 9th Street	Improve alignment
South Bay Boulevard and Ramona	Signalize
South Bay Boulevard and Santa Ysabel Avenue	Make South Bay Boulevard four lanes with left turn pockets through the intersection. Add an eastbound right turn lane as well. Intersection will operate at LOS C.
South Bay and Nipomo	Signalize; intersection will operate at LOS B
South Bay and Pismo	Signalize; intersection will operate at LOS B
South Bay and El Moro	Signalize; intersection will operate at LOS B

5.1.3.5 Mitigation Measures

~~Los Osos Area~~

~~T-1 Implement measures identified in the Estero Area Plan Update (August 2003).~~

~~Rural Estero~~

~~T-2 Implement measures identified in the Estero Area Plan Update, (August 2003).~~

Implementation of measures identified in the Estero Area Plan Update would be sufficient to mitigate most impacts anticipated under the Draft Plan. No additional mitigation is recommended.

~~The draft Area Plan recommends two 12-foot travel lanes and two 8-foot wide shoulders on South Bay Boulevard north of Santa Ysabel. This is not expected to provide sufficient capacity to improve the level of service to D or above. Although transit demand management techniques could improve capacity by as much as 15%, this impact is considered adverse and unavoidable (Class I).~~

~~It should be noted that the impacted segment of South Bay Boulevard is not under County jurisdiction, but rather under the control of either the State or City of Morro Bay. Consequently, implementation of these improvements is somewhat speculative since the availability of funding is unknown in the future and the improvements could only be implemented with the cooperation of these jurisdictions. It should also be remembered that the recommended widenings are intended as guidelines for generalized long-range planning purposes and more detailed analyses should be completed as the planning area builds out.~~

~~Impacts to South Bay Boulevard north of Santa Ysabel, Santa Ysabel west of South Bay Boulevard, and Highway 1 through Morro Bay would be significant and unavoidable (Class I). All other impacts would be less than significant because of measures included in the Area Plan as outlined above.~~

5.1.4 Transportation System/Demand Management

Transportation Demand Management (TDM) refers to programs and policies intended to reduce travel demands and congestion on the roadway system through various means, particularly during peak traffic periods. Transportation System Management (TSM) entails the provision of low cost engineering improvements to enhance the capacity of the existing circulation facilities without requiring major capital expansions. These strategies have become the focus of efforts by jurisdictions throughout the State to reduce both traffic congestion and traffic-related air emissions. As outlined in the 2001 RTP and the County's Clean Air Plan (CAP), TSM/TDM programs encompass a broad range of potential actions, including incentives for transit use and ridesharing, management of parking facilities, provision of amenities for pedestrians and bicyclists, adoption of land use controls that are supportive of alternative commute modes, and implementation of low cost engineering strategies to improve overall system efficiency. TSM/TDM methods are also closely related to the goals and recommendations of the County's CAP.

TSM programs involve engineering strategies designed to improve roadway traffic flow and maximize traffic efficiency with minimal expenditures for capacity expansion. Examples of these methods include traffic signal synchronization and timing, channelization of street intersections, designation of one-way streets, provision of left and right-turn lanes, implementation of passing lanes and high occupancy vehicle lanes, and utilization of peak hour on-street parking limitations.

TDM programs involve methods to reduce the number of single occupant vehicle trips made in the planning area by promoting alternative modes of travel such as ridesharing, transit, and bicycling. TDM policies can be used to reduce or delay the need for more expensive conventional street and highway improvements, such as adding traffic lanes or constructing new roads. Demand strategies emphasize productivity, efficiency, and modification of individual transportation choices. They are typically designed to promote alternative mode choices both voluntarily and through trip reduction ordinances. Land use planning strategies can also be implemented to reduce dependence on the automobile. For instance, residential communities, commercial centers, and employment bases can be located and designed in a way that reduces the need to drive. Land use polices and standards can also be developed which require developments to mitigate their effects on the circulation system.

TDM measures are most frequently directed at commute trips made by employees and students because these groups comprise the bulk of peak-hour travel. In the Estero planning area, it is estimated that trips for work and school purposes comprise over 75 percent of the peak hour travel. Because roadway and intersection lane requirements are generally determined based on peak hour design volumes, the most effective opportunities for trip reductions occur among these commute trips.

Currently, most TDM programs are targeted at large employers and large employment/ educational centers. It is in these settings that commuters (and students) with similar origins and work schedules can be matched for carpools and support transit service. In this regard, S.R. 1, Los Osos Valley Road, and South Bay Boulevard serve as primary routes for commuters and students within the Estero Area. Therefore, actions to implement TDM measures must include many parties in addition to the County of San Luis Obispo. Trip reductions within the planning area will depend heavily on the involvement of the County, the City of Morro Bay, surrounding unincorporated areas, large and small employers, schools, and other jurisdictions in setting policies and promoting TDM actions. TDM programs in the Estero area are currently supported by Caltrans, the County, the City of Morro Bay, and Cal Poly. The programs involve a variety of elements to encourage ridesharing, transit riding, bicycling and walking to work.

Residential densities are a secondary determinant in influencing the success of TDM measures. Generally, ridesharing is most effective in serving suburban commute trips of 6 to 20 miles in length, which applies to many commutes in the Estero planning area, as well as other nearby planning areas, including those using the heavily

traveled Highway 101, S.R. 1, S.R. 227 and Los Osos Valley Road corridors. To be cost effective, frequent transit service also requires residential densities of at least seven dwelling units per acre. This criteria is also met in most of the Estero urban areas.

Various TSM/TDM programs are discussed in the following text with respect to their potential applications in the Estero planning area.

5.1.4.1 Types of Programs

a. Transportation System Management (TSM) Strategies

The goal of the TSM strategies is to improve traffic flow conditions on the planning area's circulation network in order to maximize the use and efficiency of the existing transportation facilities, thus limiting or delaying the need for future capacity expansion projects. It is recommended that the County actively pursue a strong TSM program in the Estero planning area. Key components of such a plan are outlined below:

- Implement coordinated traffic signal timing plans, including the interconnection and synchronization of traffic signals if and when they are installed. The County should encourage other jurisdictions in the Estero planning area (City of Morro Bay and Caltrans) to enter into cooperative signal timing agreements to provide regional and sub-regional signal system coordination plans;
- Promote the provision of intersection channelization at locations where warranted by traffic volumes, conflicts, delays and accidents;
- Explore the feasibility of converting existing two-way street systems to pairs of one-way streets;
- Review the feasibility of eliminating or restricting on-street parking on congested routes to provide increased capacity without requiring street widening.

b. Transit Service

Public transportation is currently provided between the San Luis Obispo region and the communities in the Estero planning area by the following transit agencies or operators:

- **San Luis Obispo Regional Transit Authority (SLORTA).** The SLORTA was created by a joint powers agreement between the County and some of the incorporated cities. SLORTA currently provides fixed routes of service, dialysis transportation (medical service), and implements the county-wide ride-sharing program. In addition, SLORTA operates a paratransit system (Runabout), that provides countywide dial-a-ride service primarily to seniors and disabled persons. The San Luis Obispo Council of Governments is the policy board.

- **Other Dial-A-Ride Providers.** Dial-a-ride services are also provided within Atascadero, Morro Bay and Los Osos. In addition, Ride-On Transportation provides quasi-public transit service, primarily to medi-care customers.

Transit service improvements can be very effective in markets where other conditions are supportive (e.g. high employment densities with pay parking, high employment densities, educational facilities with large populations and downtown areas experiencing heavy traffic congestion). In these settings, trip reductions of 20 to 50 percent have been documented. Without these supportive conditions, trip reductions of less than 10 percent could be expected.

Expanded transit service with support facilities can increase the attractiveness of commuting by public transit. In surveys of local bus operations, frequency and reliability of the bus schedule were often ranked as the primary concerns of transit patrons. A number of actions are available to increase the use of transit both for commute and non-commute travel. These include the following:

- Transit schedules should be designed to reduce headways (maximum waiting times between bus service) and to make transfer connections more reliable. The increases in the number of bus trips on existing routes should initially emphasize the peak commute periods. Bus headways of 20 to 30 minutes during these hours may be required to boost ridership;
- Provide bus shelters and route signing at major bus stops. New development should contribute funds to provide bus stops and shelters;
- Develop enhanced transit centers to facilitate intermodal transfers (e.g. cars to buses, bus transfers, etc.);
- Implement subscription bus service for long-distance commuters, providing custom service at a monthly rate for groups of commuters with common origins and destinations;
- Introduction of bicycle racks on buses serving the planning area can promote the use of bicycle/transit commuting for long-distance commuters as well as students (already implemented);
- Provide subsidized transit services;
- Explore the possibility of implementing a free or low cost shuttle system in urbanized areas between employment centers, retail areas, housing tracts and education centers. These types of shuttles can be highly effective during mid-day periods, as well as weekends;
- SLOCOG should continue to assess long-range transit needs for the region, based on growth assumptions contained in community and county general plans, and promote coordination of the various transportation companies serving the county.

The CAP also includes a proposed control measure designed to increase overall transit ridership by 2.5 percent per year county-wide, which would also reduce trips generated within the planning areas to a similar degree. The measure calls for various transit infrastructure improvements, as well as additions to transit service along a number of transportation routes, including Highway 101.

c. Rideshare Strategies

The Regional Transit Authority, in cooperation with State and Federal governments, operates the Regional Ridesharing program. This program provides opportunities for carpool formation through its carpool matching service. In addition, it serves as a clearinghouse for information on all other alternative transportation modes. The ridesharing program concentrates on outreach to major employers, as these have the density of employment necessary to assure successful carpool matching. Ridesharing can be further enhanced through the following measures:

- Install or enlarge Park & Ride lots. The County and SLOCOG should work with local jurisdictions to expand the capacity of existing Park & Ride lots where daily capacity reaches 80%. The County should also seek available funding to increase the number of Park & Ride lots in the Estero planning area, particularly in areas adjacent to major commute corridors (S.R. 1, Los Osos Valley Road, and South Bay Boulevard) and popular bus stops and/or transit centers. New development could also contribute lands and monies toward the creation of new Park & Ride facilities.
- Require employers to reserve carpool/vanpool parking in preferred locations for employee parking.
- Encourage vanpooling by subsidizing vehicle purchase and insurance, and allow for personal use by the assigned driver.
- Continue to expand the County's successful Ridesharing Program through increased education and promotional activities.
- In areas with pay parking, require employers to provide a rate reduction for commuters who rideshare.

Programs to provide such incentives and amenities are typically required of large employers in some communities that have enacted Trip Reduction Ordinances (TRO). It has been recommended that the County adopt a county-wide measure that would require all employers in the County of 100 or more employees to prepare trip reduction plans that would include incentives to reduce employee's reliance on Single Occupant Vehicle (SOV) travel. The proposed measure could also be extended to cover high schools and colleges in the county with enrollments greater than 500 students.

d. Bicycle Incentives

A number of means to increase the use of bicycling as an alternative travel mode are available. The attractiveness of bicycling can be enhanced by providing for secure bicycle storage at the destination end of the trip, and/or by providing bicycle racks on public transit buses. Showers and lockers also provide added convenience for bicycle commuters. In addition, exclusive bikeways or shared bicycle/pedestrian paths can be provided in corridors where the volume of bicycle traffic is high or where conflicts with vehicle traffic are present.

- New employment centers should be required to install bicycle lockers and shower facilities for employees;
- County sponsored transit facilities should be equipped to handle bicycles;
- Existing Park & Ride facilities should be enhanced with bicycle lockers (lockers are installed at all Park & Ride facilities in Caltrans right-of-way. New Park & Ride facilities should also be equipped with such devices;
- The County should delineate and expand the amount of maintenance funding which is allotted for bicycle facilities. This includes existing maintenance such as street sweeping and bicycle pavement markings.

e. Alternative Work Schedules

The intent of these TDM measures is to reduce commuter travel or shift this travel to off-peak hours. These measures may include the following:

- Encourage employers to adopt shortened work weeks of 4-day/40-hour or 9-day/80 hour schedules.
- Implement flexible work schedules to facilitate the use of transit or carpooling by employees.
- Adopt staggered work hours to reduce peak-hour traffic impacts associated with shift changes and work schedules.
- Adopt telecommuting and teleconferencing programs to enable employees to work at, or close to, home one or more days per week. These strategies can be facilitated with satellite offices that include computers with modems, copiers, facsimile transmission machines, and video telecommunications.

The trip reduction measures described above are among those for which employers could receive trip reduction credit under the CAP control measures. Such measures could reduce buildout trips by up to five percent.

5.1.4.2 Effectiveness of TDM Programs/Recommended Measures.

The County's CAP recommends a number of ordinances and policies which promote the use of alternative modes of transportation instead of Single-Occupancy Vehicles (SOVs). These ordinances and policies would be expected to increase the use of various alternative transportation modes in the planning area, including transit use, carpooling, bicycling and walking. The relative effectiveness of various TDM measures are quantified in the following section, based on studies contained in ITE publications.

These programs may potentially reduce future trip generation associated with buildout of the planning area by 15 percent, thus reducing future travel demands on the study- area roadway network. Potential air quality benefits associated with this trip reduction are discussed in Section 5.2 (Air Quality).

Though the trip reductions attributable to TDM programs can reduce future travel demands on the study-area street system, these programs may not be considered as formal mitigation measure for future deficiencies unless ordinances supporting their implementation are adopted by the County as well as the local jurisdictions. If these TDM programs are enacted and successfully implemented, physical improvements (i.e. roadway widenings, access limitations, and signal installations) for the area plan street system could be delayed and/or reduced.

5.1.5 Cumulative Impacts

Because the transportation and circulation impacts described in this analysis are considered cumulative for the Estero Area, no additional cumulative impacts would occur.

5.1.6 Residual Impacts

The draft Area Plan recommends two 12-foot travel lanes and two 8-foot wide shoulders on South Bay Boulevard north of Santa Ysabel. This is not expected to provide sufficient capacity to improve the level of service to D or above. Although transit demand management techniques could improve capacity by as much as 15%, this impact is considered adverse and unavoidable (Class I).

It should be noted that the impacted segment of South Bay Boulevard is not under County jurisdiction, but rather under the control of either the State or City of Morro Bay. Consequently, implementation of these improvements is somewhat speculative since the availability of funding is unknown in the future and the improvements could only be implemented with the cooperation of these jurisdictions. It should also be remembered that the recommended widenings are intended as guidelines for generalized long-range planning purposes and more detailed analyses should be completed as the planning area builds out.

Impacts to South Bay Boulevard north of Santa Ysabel and Highway 1 through Morro Bay would be significant and unavoidable (Class I). All other impacts would be less than significant because of improvements proposed in the Area Plan and the South Bay Circulation Study.

5.2 Air Quality

Air pollution is considered a health hazard. To help protect the public from the harmful effects of air pollution, federal and State air quality standards have been adopted. Currently, San Luis Obispo County is a non-attainment area for the State standards for ozone and respirable particulate matter (PM 10). Emissions of these air pollutants, and their precursors, will increase as a result of increased motor vehicle trips generated by development in accordance with the Draft Area Plan, and from the operation of heating and air-conditioning systems, industrial and manufacturing processes and other sources associated with such development. As this EIR is of a programmatic nature it "does not require a quantitative air emissions analysis at the project scale. A qualitative analysis of air quality impacts should be conducted instead, and should be generated for each of the proposed alternatives to be considered."[1] Pursuant to the preceding Air Pollution Control District (APCD) recommendations, the main analysis included in this section will be evaluation of consistency with the Clean Air Plan (CAP).

5.2.1 Setting

5.2.1.1 Environmental Setting

The Estero Area Plan governs coastal San Luis Obispo County between the communities of Cayucos and Los Osos. The area is characterized by hills and low mountains penetrated by a series of valleys that lead inland from the ocean.

The climate of the Estero planning area can be described as semi-arid with warm, dry summers followed by a cool, rainy period from November to March. Dense morning fog followed by periods of afternoon sunshine is a pattern repeated daily during the summer months. The nearest weather station to the planning area is located in San Luis Obispo, about 12 miles to the east, where minimum average January temperatures have averaged about 42° F and maximum September temperatures have averaged about 79°F. The average annual rainfall in San Luis Obispo measured from 1950 to 1980 was 23 inches. These data are considered representative of the planning area, although the high and low temperatures will be moderated by the proximity of the ocean.

Environmental factors which affect air quality in the Estero area include:

- The type, quantity and location of pollutant emissions.

The emissions inventory compiled by the San Luis Obispo Air Pollution Control District (APCD) indicates the primary emissions source affecting the coastal air shed is motor vehicles and emissions from the PG&E Morro Bay power plant. Therefore, projects that result in an increase in motor vehicle trips could have an adverse impact on air quality. Likewise, changes to the operation of the power plant could have an impact on air quality.

- The physical setting.

The Estero Area contains varied topography ranging from broad coastal plains and valleys to low mountains. The valleys that separate the hills and mountains extend well inland, providing an avenue for pollutants to travel on the prevailing westerly breezes. During periods of low inversions (see below) pollutants may be trapped against these hills causing pollutant concentrations to rise.

- The weather and climate of the area.

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1 *CEQA Air Quality Handbook* (April 2003). Air Pollution Control District of San Luis Obispo County.

Local and regional weather conditions, including wind speed and direction (as outlined above), atmospheric stability, air temperature, and the presence or absence of temperature inversions can all contribute to increasing pollutant concentrations.

The speed and direction of local winds are influenced by several factors, including: 1) the location and strength of the Pacific High Pressure System, 2) local and regional topographic conditions, and 3) circulation patterns resulting from temperature differences between the land and the sea.

During the spring and summer, the Pacific High attains its greatest strength. During the day, the prevailing winds are onshore from the northwest. As evening approaches, the onshore winds die down and the wind direction reverses resulting in weak easterly winds flowing down the coastal mountains and valleys toward the ocean. In the fall, onshore winds decline allowing an occasional offshore flow. The combination of daily onshore breezes and nightly offshore flow can result in a "sloshing" effect which allows pollutants to accumulate over the ocean and be carried onshore with the return of sea breezes.

Normally, air temperature decreases with altitude in the atmosphere. The temperature is said to be "inverted" when it decreases for a certain altitude and then increases for a short distance before decreasing again (see Figure 5.2-1). The resultant warm air mass acts as a barrier to vertical circulation, confining pollutants and increasing their local concentration. When inversions occur at altitudes lower than surrounding topographic features, such as the coastal hills and mountains, pollutants can be especially concentrated.

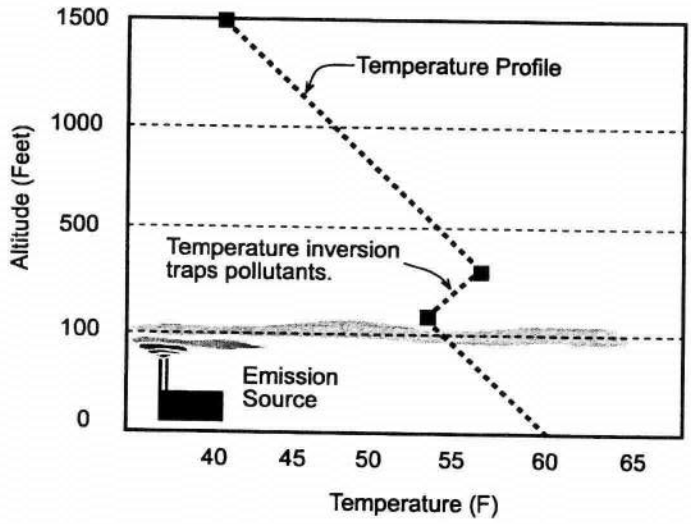


Figure 5.2-1: Temperature Inversion

5.2.1.2 Regulatory Setting

Table 5.2-7 summarizes federal and State air quality standards that establish thresholds for the maximum acceptable concentrations of selected pollutants (so-called "criteria pollutants"). In most cases, the State standards are more strict than their federal counterparts.

a. Air Quality Standards

Ambient air quality (the level of certain pollutants) is monitored at several locations throughout the County by the San Luis Obispo County Air Pollution Control District (APCD) and others. For example, ozone, sulphur

dioxide and respirable particulate matter (also known as PM10) have been monitored in Morro Bay since 1985. Tables 5.2-1 and 5.2-2 show the number of days exceeding the State ozone and PM10 standards, respectively, for Morro Bay, Nipomo and Paso Robles. Table 5.2-1 shows that the State ozone standard was equaled or exceeded three times in the past decade in Morro Bay.

Table 5.2-1. Number of Days Exceeding the State Ozone Standard

Location	1991	1992	1993	1994	1995	1996	1997	1998	1999	2000	2001
Morro Bay	1	1	0	0	0	0	0	0	1	0	0
Nipomo	0	0	1	0	0	1	0	NA	0	0	0
Paso Robles	0	0	0	1	5	9	0	25	1	0	0

Source: San Luis Obispo County Air Pollution Control District

Table 5.2-2. Number of Days Exceeding the State PM10 Standard

Location	1991	1992	1993	1994	1995	1996	1997	1998	1999	2000	2001
Morro Bay	0	0	2	0	0	0	1	0	0	0	0
Nipomo	0	0	1	1	1	0	NA	0	0	0	2
Paso Robles	4	2	2	0	3	0	1	1	1	2	2

Note: PM10 measurements are taken once every six days, or sixty times per year. Thus, a year in which the standard was exceeded on six days would have exceeded the standard on 10% of all measured days.
Source: San Luis Obispo Air Pollution Control District

On a regional basis, ozone (O3) appears to be the pollutant of most concern. Ozone is a form of oxygen formed in the atmosphere by complex photochemical reactions involving precursor pollutants (compounds that provide a chemical pathway for the formation of ozone in the atmosphere) and sunlight. Precursors include reactive organic gases (ROG), also known as reactive hydrocarbons (RHC), and oxides of nitrogen (NOx). NOx emissions result from the combustion of fuels, including the so-called "fossil fuels" (oil, natural gas, coal, etc.). Sources of ROG emissions include the incomplete combustion of fossil fuels and the evaporation of petroleum products. The amount of ozone formed in the atmosphere depends on the concentration of these chemical precursors and the intensity and duration of sunlight. Consequently, ambient ozone concentrations tend to vary with the seasons (higher in summertime, lower in winter when there is less sunlight).

San Luis Obispo County is either an "attainment area" or "unclassified" for all pollutants regulated by the Federal Clean Air Act and the National Ambient Air Quality Standards. An "attainment area" is one where air quality meets, or attains the air quality standard. An area is said to be "unclassified" when there is insufficient data to determine attainment or nonattainment.

The County is currently a "moderate nonattainment area" for the State ozone standard. To meet the standard, the County is required to reduce emissions of ozone precursors by at least 5 percent per year until the standard is achieved. The California Air Resources Board (ARB) requires that emissions of ozone precursors countywide be decreased by 20 percent from 1987 levels as a strategy to meet the State standard. However, it is currently estimated that countywide emissions of nonattainment pollutants must be reduced by at least 40 percent from 1987 levels to meet State standards.

The County is also a nonattainment area for the State standard for respirable particulate matter (PM10). According to the Air Pollution Control District, a plan will be developed to provide strategies to meet this standard in the future. One source of respirable particulate matter is "re- entrained" road dust, or dust that is generated and re-circulated by on-road motor vehicles. Mitigation strategies to reduce the total amount and length of on-road motor vehicle trips will have a beneficial impact on respirable particulates as well.

Other pollutants of concern include diesel particulate matter, naturally occurring asbestos, and toxic air pollutants. Diesel particulate matter is associated with emissions from construction equipment. There is no standard for exposure to diesel particulate matter; specific projects are instead analyzed on a case-by-case basis. Assessment of diesel particulate matter is more appropriate, therefore, in project-specific environmental analysis. Naturally occurring asbestos is locally associated with serpentine soils. Disturbance of serpentine during construction may result in worker exposure to asbestos. Specific projects are reviewed for presence of serpentine soils and control measures are required to be implemented. Assessment of the potential for naturally-occurring asbestos exposure is more appropriate at the project-specific level. Toxic air pollutants can include emissions from some industrial and commercial land uses. Toxic air pollutants are better addressed at the project-specific level. As stated in the introduction, this section will focus on analysis of the proposed Area Plan's consistency with the CAP, rather than quantitative analysis of potential emissions.

5.2.2 Significance Thresholds

The APCD has prepared and adopted the *2003 California Environmental Quality Act (CEQA) Air Quality Handbook* to assist in the assessment of air quality impacts. The Handbook provides methodology for the assessment of air quality impacts from development activities and establishes thresholds of significance for both construction and operational impacts. For projects such as a general plan whose scope is large and implemented over time (i.e., "programmatic"), the Handbook provides a range of land use and circulation management strategies aimed at reducing the generation of emissions through community design.

The APCD has established guidelines to determine the significance of impacts associated with specific development proposals. The characteristics of a project (size, land use, vehicle trips generated, etc.) are input to a computer program to determine the emissions that would be generated. Specific measures can then be imposed to reduce emissions levels.

Owing to the lack of detail in an Area Plan compared to individual development projects, the APCD recommends comparison of the plan with the adopted CAP in lieu of computer modeling. The APCD recommends that the consistency analysis address whether:

- The population projections used in the plan are equal to or less than those used in the most recent CAP for the same area;
- The rate of increase in vehicle trips and miles traveled are less than or equal to the rate of population growth for the same area;
- All applicable land use and transportation control measures and strategies from the CAP been included in the plan or project to the maximum extent feasible

If the answer to all of the above is yes, then the plan is determined consistent with the CAP. If the answer to any of the above is no, then the plan is considered inhibitive to the CAP and is considered inconsistent. Inconsistency with the CAP is considered a significant impact.

5.2.3 Proposed Project Impacts and Mitigation Measures

5.2.3.1 Area-wide Impacts

Impact AQ-1: Consistency with the Clean Air Plan

Air quality impacts associated with the adoption of a plan or program are more appropriately assessed by determining consistency with the adopted Clean Air Plan.

1. *Are the population projections contained in the proposed Estero Area Plan equal to or less than those used in the Clean Air Plan?*

Area Plan Response. The proposed Estero Area Plan would accommodate a buildout population of about 26,171 within the planning area by 2020, an increase of 7,701 over the current population of about 18,470. The CAP only projects population to the year 2015. The Estero Area Plan would accommodate 23,520 people by 2015. The CAP projects a population of 23,146 for the Estero Area (listed as Estero (rural), Cayucos, and Los Osos) by the year 2015. Although the Area Plan shows a slightly greater population potential for the year 2015, (1.6 percent greater), this is considered well within the margin of error for such projections. A number of factors can influence the amount of growth in a particular area over a decade, including local and regional economy, and resource limitations. For instance, the presence of a sewer in Los Osos would change the rate and amount of growth in that area. For the purposes of this analysis, the Area Plan is considered consistent with the CAP in terms of projected population.

2. *Is the rate of increase in vehicle trips and miles traveled equal to or less than the rate of population growth projected by the proposed Estero Area Plan?*

Area Plan Response. The proposed Area Plan contains a number of policies to promote greater use of alternatives to the single-occupant automobile. These methods include encouraging increased use of bicycles and public transit, promoting ridesharing, and supporting telecommuting. These trip reduction techniques are anticipated to reduce per capita vehicle miles traveled (VMT), with a corresponding improvement to regional air quality. The overall reduction in VMT within the planning area will help ensure that the rate of growth in area-wide VMT would be less than the projected population growth rate for the planning area, which in turn helps ensure consistency with the CAP. Other methods to reduce VMT are discussed below.

3. *Have the applicable land use planning strategies and transportation control measures contained in the Clean Air Plan been incorporated into the proposed Estero Area Plan to the extent feasible?*

A third measure of consistency is whether or not the Area Plan is consistent with the various policies and strategies described in the CAP for attainment of the ozone and PM10 standards. Overall, the CAP promotes the use of both circulation and land use strategies to help meet the state ozone standard. The following discussion focuses on applicable land use strategies contained in the CAP.

Compact Communities. Strategy L-1 of the CAP promotes the development of communities in which housing, job centers, and support services are located close together to enable the efficient use of alternate forms of transportation such as walking, bicycling and transit. The strategy also promotes the development of urban land uses within the existing urban reserve lines of cities to discourage "sprawl".

Area Plan Response. The Area Plan concentrates urban development within the urban reserve lines of existing urban areas (Cayucos, Morro Bay and Los Osos). In addition, the total acreage designated for residential development is reduced by over 200 acres (primarily in Los Osos) which means that the total population holding capacity of the recommended plan is less than the adopted plan. Moreover, no urban reserve lines are proposed for amendment. Overall, the proposed Estero Area Plan is consistent with this policy.

Providing For Mixed Land Uses. A corollary to strategy L-1, the mixed-use strategy promotes the development of land uses in close proximity that are complementary in terms of trip origins and destinations. For example, projects that incorporate residences with commercial or office land uses on the same site promote walking and make vehicle trips shorter.

Area Plan Response. Policies of the Area Plan promote infill development within the existing urban reserve line with emphasis on mixed-use development. Within the community of Los Osos, the draft plan establishes a 75.5 acre mixed-use area within the Morro Shores area which is intended for a combination of residential, commercial, service and office uses, as well as lodging. The intent of this designation is to accommodate development of a multi-use business park that provide jobs (from non-polluting industries) and affordable housing within close proximity. The resulting air quality benefits would include shorter and perhaps fewer motor vehicle trips. Overall, the Area Plan can be considered consistent with this policy.

Balancing Jobs and Housing. This strategy encourages the development of housing in sufficient quantities and price to meet the needs of the local work force, enabling workers to live near their jobs and reduce the home-to-work commute distance. For areas that are "housing rich", this strategy would promote the development of job-generating land uses to encourage residents to work within a City or unincorporated community. Communities with jobs/housing ratios of between 1.0 and 1.6 jobs per housing unit are typically considered "balanced."

Area Plan Response. The Estero planning area can be considered 'housing rich' for purposes of discussing the jobs/housing balance. The Area Plan proposes to increase the amount of land devoted to non-residential land uses, and primarily those devoted to commercial and public facilities land uses. A corresponding decrease in the amount of land devoted to single-family residential land uses is also proposed. Although the Area Plan as a whole will remain inconsistent with the goal of establishing a ratio of 1.0 to 1.6 jobs per household, the gap will narrow somewhat. Moreover, the goal of balancing jobs and housing must be weighed within the context of other competing goals of the Area Plan, such as the desire to preserve the scale and character of existing urban areas and preserve sensitive resources.

Circulation Management Policies and Programs. The CAP recommends that local and regional (county) jurisdictions adopt policies and programs to prevent or reduce congestion during peak commute hours by encouraging alternatives to single-occupant motor vehicles. It is also recommended that roadway improvements be designed to accommodate projected traffic volumes without providing excess capacity, that local transit service be improved, that bicycle/pedestrian transportation networks be developed, and that transportation demand management (TDM) strategies be incorporated into local plans.

Area Plan Response. The overall goals of the Circulation Element of the proposed Estero Area Plan include:

1. Plan transportation system improvements to provide for, but not exceed, the demand of visitors and permanent residents in the year 2030. These improvements should be consistent with the land use patterns allowed by both the land use element and the cities' general plans, so that growth is not facilitated or induced in inappropriate amounts or locations.
2. Establish an efficient circulation system and pattern of land use that minimizes the number of automobile trips. And,
3. Encourage alternatives to single-occupant vehicles travel, such as pedestrian and bicycle travel, transit, and carpooling. At the same time, accommodate automobile transportation.

Thus, the Circulation Element of the proposed Estero Area Plan recognizes that transportation in the planning area is likely to remain automobile-based. Nevertheless, it recommends efforts to make alternative modes of travel, such as transit and bikeways, increasingly important parts of the areawide transportation network.

The proposed Estero Area Plan also contains a number of policies and programs (detailed in Section 5.1, "Transportation and Circulation") to promote transit as an alternative to the single-occupant vehicle. The

Circulation Element encourages the development of additional bicycle facilities and easing bus access and use. The Plan encourages the provision of bicycle and pedestrian routes between residential areas, schools and commercial areas. Overall, the proposed Area Plan is consistent with this policy.

5.2.3.2 Community Specific Impacts

Impacts related to project implementation for Rural Estero, Los Osos, Cayucos, Other Watershed Area and Cayucos Fringe are similar to those described in the area-wide impacts discussion above. Mitigation measures are similar to those described in "Mitigation Measures" below.

5.2.3.3 Mitigation Measures

None required.

5.2.4 Cumulative Impacts

Cumulative air quality impacts will result from development which occurs throughout the air basin described in the CAP. Cumulative emission increases associated with residential and nonresidential development will contribute to the degradation of regional air quality. While agricultural operations will continue to make a large contribution to PM10 levels in the planning area, agricultural activity is not expected to substantially increase under the proposed Estero Area Plan.

As previously discussed, population projections for the proposed Estero Area Plan are similar to those included in the CAP. The Area Plan proposes a number of measures designed to reduce vehicle miles traveled and associated air emissions. Consequently, emissions associated with cumulative development in the area would be within the emission projections upon which the CAP's control strategies are based.

5.2.5 Residual Impacts

Based on consistency with the Clean Air Plan, adoption of the policies, programs and standards contained in the proposed Area Plan, would not result in a significant adverse impact on air quality because implementation of the Clean Air Plan is expected to result in attainment of the State ozone standard within the next three to five years. Individual development projects, however, will be evaluated on a project-by-project basis to determine the potential impacts to air quality, and appropriate mitigation may be required as determined by the County and the Air Pollution Control District.

Table 5.2-3: State and Federal Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards[1]		National Standards[2]		
		Concentration[3]	Method[4]	Primary[3,5]	Secondary[3,4,6]	Method[7]
Ozone	1 Hour	0.09 ppm (180 µg/m3)	Ultraviolet Photometry	0.12 ppm (235 µg/m3)	Same as Primary Std.	Ethylene Chemiluminescence
Carbon Monoxide	8 Hour	9.0 ppm (10 mg/m3)	Non-dispersive infrared Spectroscopy (NDIR)	9.0 ppm (10 mg/m3)		Non-dispersive infrared Spectroscopy (NDIR)
	1 Hour	20 ppm (23 mg/m3)		35 ppm (40 mg/m3)		
Nitrogen Dioxide	Annual Average	---	Gas Phase Chemiluminescence	0.053 ppm (100 µg/m3)	Same as Primary Std.	Gas Phase Chemiluminescence
	1 Hour	0.25 ppm (470 µg/m3)		---		
Sulfur Dioxide	Annual Average	---	Ultraviolet Fluorescence	80 µg/m3 (0.03 ppm)	---	Pararosoaniline
	24 Hour	0.05 ppm[8] (131 µg/m3)		365 µg/m3 (0.14 ppm)	---	
	3 Hour	---		---	1300 µg/m3 (0.5 ppm)	
	1 Hour	0.25 ppm (655 µg/m3)		---	---	
Suspended Particulate Matter (PM_{10})	Annual Geometric Mean	30 µg/m3	Size Selective Inlet High Volume Sampler and Gravimetric Analysis	---	---	---
	24 Hour	50 µg/m3		150 µg/m3	Same as Primary Stds.	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	---	---	50 µg/m3		
Sulfates	24 Hour	25 µg/m3	Turbidimetric Barium Sulfate	---	---	---
Lead	30 Day Average	1.5 µg/m3	Atomic Absorption	---	---	Atomic Absorption
	Calendar Quarter	---		1.5 µg/m3	Same as Primary Std.	
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m3)	Cadmium Hydroxide Stractan	---	---	---
Vinyl Chloride (chloro-ethane)	24 Hour	0.010 ppm (26 µg/m3)	Tedlar Bag Collection, Gas Chromatography	---	---	---
Visibility Reducing Particles[9]	8 Hour (10 a.m.-6 p.m. PST)	In sufficient amount to produce an extinction coefficient of 0.23 per kilometer due to particulates when the relative humidity is less than 70 percent. Measurement in accordance with ARB method V.		---	---	---

Notes for Table 5.2-8

1. California standards for ozone, carbon monoxide, sulfur dioxide (1 hour), nitrogen dioxide, suspended particulate matter - PM_{10} and visibility-reducing particulates, are values that are not to be exceeded. The

sulfur dioxide (24-hour), sulfates, lead, hydrogen sulfide and vinyl chloride standards are not to be equaled or exceeded.

2. National standards, other than ozone and those based on annual averages or annual arithmetic means, are not to be exceeded more than once a year. The ozone standard is attained when the expected number of days per calendar year with maximum hourly average concentrations above the standard is equal to or less than one.

3. Concentration is expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 mm of mercury. All measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 mm of mercury (1,013.2 millibar); ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.

4. Any equivalent procedure which can be shown to the satisfaction of the Air Resources Board to give equivalent results at or near the level of the air quality standard may be used.

5. National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health. Each state must attain the primary standards no later than three years after that state's implementation plan is approved by the Environmental Protection Agency.

6. National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant. Each state must attain the secondary standards within a "reasonable time" after the implementation plan is approved by the EPA.

7. Reference method as described by the EPA. An "equivalent method" of measurement may be used but must have a "consistent relationship to the reference method" and must be approved by the EPA.

8. At locations where the state standards for ozone and/or total suspended particulate matter are violated. National standards apply elsewhere.

9. This standard is intended to limit the frequency and severity of visibility impairment due to regional haze and is equivalent to a ten-mile nominal visual range when relative humidity is less than 70 percent.

5.3 Noise

This section addresses potential noise impacts that would result from implementation of the proposed Estero Area Plan. The noise analysis is based on an evaluation of the proposed Estero Area Plan in relation to existing noise conditions as indicated in the Noise Element and by existing traffic levels.

It is important to note that noise is very difficult to assess at the area plan level. Site-specific factors such as topography, intervening structures and building construction, may significantly affect noise exposure at a given location. The following discussion attempts to estimate future noise increases associated with growth in each of the Estero sub-areas, and to give a general picture of the scope of potential impacts. Throughout the section the reader should keep in mind that these calculations are based on relatively general information and are not intended to assess site-specific impacts (such as the resulting noise level at 1234 Elm St.).

5.3.1 Setting

5.3.1.1 Characteristics and Measurements of Noise / Existing Conditions

a. Characteristics and Measurements of Noise

Nature of noise.
Noise levels are measured on a logarithmic scale because of the physical characteristics associated with noise transmission and reception. Noise is typically expressed in decibels (dBA). A doubling of noise energy normally results in a 3.0 decibel (dB) increase in noise levels. Because of the structure of the human auditory system, a 10-decibel increase in noise is required to perceive a doubling of noise. A 1- to 2-decibel change in ambient noise levels is generally not perceptible to sensitive receptors (defined below).

Noise levels are generally reported in terms of the "A" weighting scale, which modifies actual sound power levels to correspond to the human perception of sound. The symbol dBA indicates a noise measurement incorporating this weighting scale. Noise levels diminish (or attenuate) as distance from the source increases based on an inverse square rule, but the rate constant varies with the type of sound source. Sound from point sources, such as industrial facilities, attenuates at a rate of 6 dBA per doubling of distance. Heavily-traveled roads with few gaps in traffic behave as continuous line sources with an attenuation rate of 3 dBA per doubling of distance. Otherwise, roads typically have an attenuation rate of 4.5 dBA.

Factors Affecting Noise.
The duration of noise and the time period at which it occurs are important factors in determining the impact of noise on sensitive land uses. Such factors are accounted for by the Community Noise Equivalent Level (CNEL) and the Day-Night Average Level (DNL or Ldn), indices used to measure average daily noise levels. There are time-weighted average values based on the equivalent sound level (Leq), which is a constant sound level that equals the same amount of acoustic energy as actual time-varying sound over a particular time period. While the methods employed in determining a CNEL and Ldn reading differ slightly, the results of the two are generally equivalent. (CNEL penalizes evening (seven to 10:00 p.m.) noise levels by 5 dBA and Ldn penalizes nighttime (10:00 p.m. to 7:00 a.m.) noise levels by 10 dBA.)

Effects of Noise.

People are subject to a multitude of sounds in the urban environment. Typical noise levels of indoor/outdoor environments and public response to these sounds are shown in Figure 5.3-1. Excessive noise can be not only undesirable but may also cause physical and/or psychological damage. The amount of annoyance or damage caused by noise is dependent primarily upon three factors: the amount and nature of the noise, the amount of ambient noise present before the intruding noise, and the activity of the person working or living in the noise source area.

The difficulty in relating noise exposure to public health and welfare is one of the major obstacles in determining appropriate maximum noise levels. Although there has been some dispute in the scientific community regarding the detrimental effects of noise, a number of general conclusions have been reached:

- Noise of sufficient intensity can cause irreversible hearing damage;
- Noise can produce physiological changes in humans and animals;
- Noise can interfere with speech and other communication; and
- Noise can be a major source of annoyance by disturbing sleep, rest, and relaxation.

b. Existing Conditions

Roadways are the primary noise sources in the largely rural planning area. Stationary noise sources include construction and commercial/industrial activity. These noise sources are described more fully below.

Highway Noise.

Highway 1 is the primary planning area highway carrying sufficient traffic volumes to produce noise levels exceeding 60 dBA Ldn. Projected Area Plan traffic levels would produce noise in excess of 60 dBA Ldn along the entire length of Highway 1 within the planning area. Noise levels generated by Highway 1 traffic will exceed 70 dBA Ldn near Morro Bay. Current roadway noise for the planning area is shown in Table 5.3-1. The Table includes roadways most likely to experience significant noise levels and conflicts.

Construction Noise.

Noise associated with individual development projects occurs throughout the planning area. Because of its intermittent nature, it is not possible to characterize construction noise either by location or intensity. However, construction noise typically ranges from 70 to 95 dBA at 50 feet from the noise source, depending on the amount and types of equipment used.

Commercial Noise.

The Noise Element does not identify any existing significant stationary commercial or industrial noise sources in the Estero planning area. The Duke Energy (formerly PG&E) Morro Bay plant does not exceed 45 dBA Leq in any portion of the planning area. Future commercial or industrial development in the planning area may generate noise levels that exceed applicable County standards. However, the exact nature and potential noise generation of these sources is not quantifiable at this time.

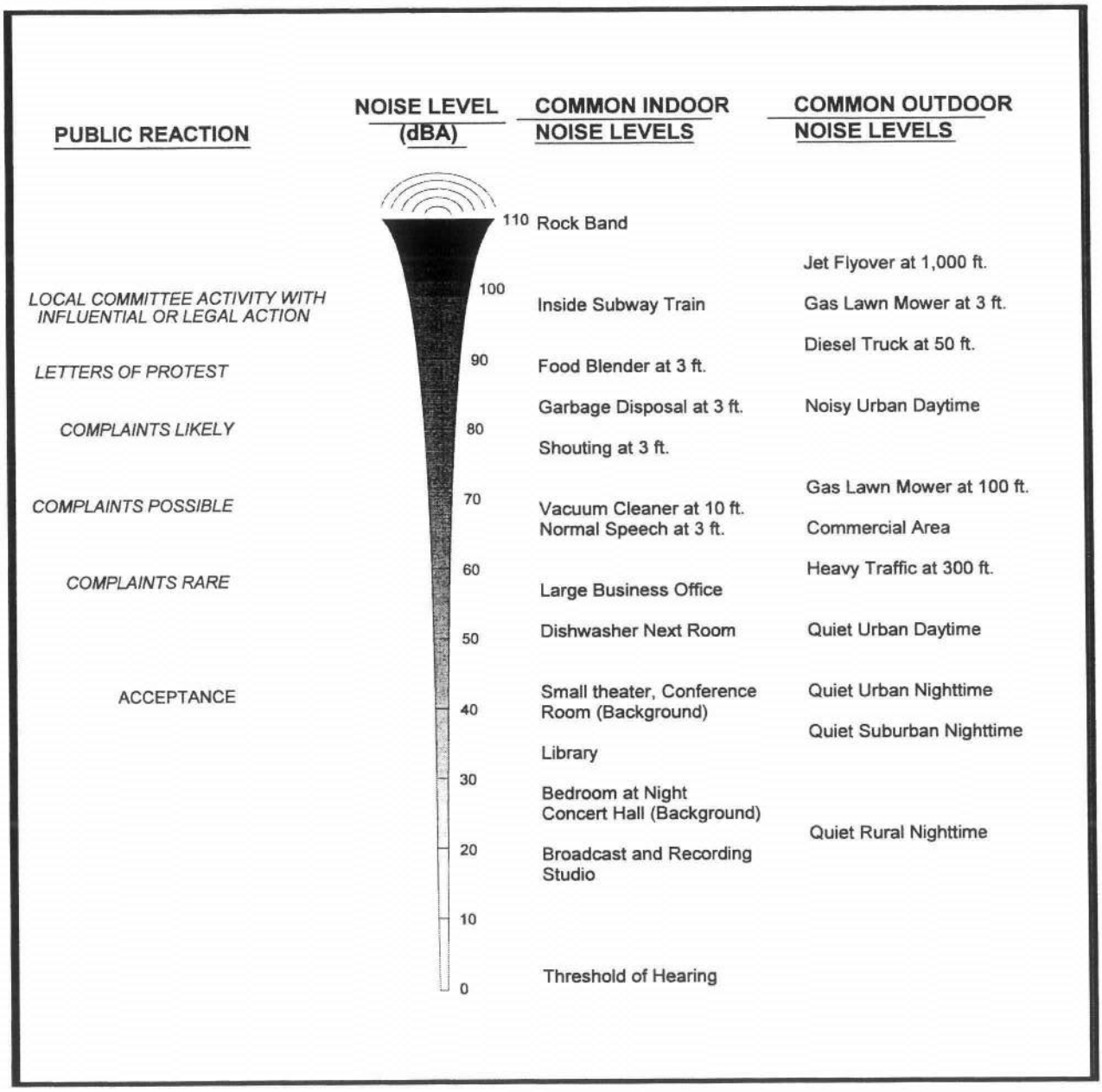


Figure 5.3-1 Common Noise Levels and Public Reaction

Sensitive Noise Receptors.
The Noise Element of the San Luis Obispo County General Plan identifies various land use types that are considered noise-sensitive. These include residences, schools, health care services, churches, public assembly facilities, libraries, museums, hotels and motels, outdoor recreation areas, and offices. The Estero planning area contains all of these uses in various locations. Noise levels in areas where these uses exist are restricted to below 70 dBA Ldn in Outdoor Sports and Recreation areas, and 60 dBA Ldn (exterior level) in all other land use types (refer to Table 5.3-2). Some existing noise-sensitive receptors are currently exposed to traffic-related noise levels exceeding this threshold. These instances are primarily limited to land uses within the Rural Area, Los Osos and Cayucos that are located along major roadways (Highway 1, Los Osos Valley Road).

Table 5.3-1: Noise Contour Data: Distance (feet) from Center of Roadway to L_{dn} Contours

Segment Nos.	Description	Sub-Area	Existing decibel contour line in ft from centerline of road		
			60 dB	65 dB	70 dB
STATE HIGHWAYS					
Highway 1					
11-12	Highland Dr to South Morro Bay Intrch.	Rural Estero	478	222	103
13-14	South Morro Bay Intrch. to North Morro Bay Intrch.	Rural Estero	456	212	98
15-16	North Morro Bay Intrch. to Jct. Rte. 41	Rural Estero	470	218	101
17-18	Jct. Rte. 41 to Old Creek Rd Intrch.	Rural Estero /Cayucos	370	172	80
19-20	Old Creek Rd Intrch. to Ardath Dr	Cayucos	190	88	41
Hwy 41					
27-28	Jct. Rte 1 to Cerro Alto Rd	Rural Estero	178	83	38
COUNTY AREA ROADS					
91-92	Los Osos Valley Rd (SLO Plng Boundary to Sombrero)	Rural Estero	293	136	63
93-94	Los Osos Valley Rd (Sombrero Dr to South Bay Blvd)	Rural Estero	252	117	54
95-96	Los Osos Valley Rd (South Bay Blvd to 9th St)	Los Osos	158	74	34
97-98	Los Osos Valley Rd (9th St to Pecho Rd)	Los Osos	106	49	23
99-100	Santa Ysabel Ave (2nd St to South Bay Blvd)	Los Osos	95	44	20
101-102	South Bay Blvd (Los Osos Valley Rd to URL)	Los Osos	223	104	48
103-104	El Morro Ave (3rd St to 11th St)	Los Osos	36	17	8
105-106	7th St (Ramona Ave to Santa Ysabel)	Los Osos	52	24	11
107-108	Ramona Ave (Pine St. to 11th St)	Los Osos	46	21	10
109-110	Pine Ave (Ramona Ave to Los Osos Valley Rd)	Los Osos	47	22	10
111-112	9th St (Ramona Ave to Los Osos Valley Rd)	Los Osos	56	26	12
113-114	Santa Inez Ave (9th St to 11th St)	Los Osos	59	27	13
115-116	10th St (Los Osos Valley Rd to Nipomo Ave)	Los Osos	59	27	13

Source: Noise Element, San Luis Obispo County General Plan (1992)

5.3.1.2 Regulatory Setting

The County of San Luis Obispo General Plan Noise Element contains goals, policies and implementation measures for the compatibility of sensitive land uses with noise. The purpose of these goals, policies and implementation measures is to reduce the various potential effects of noise on people. The Noise Element sets maximum allowable noise exposure from both transportation and stationary sources. These maximum levels are listed in Tables 5.3-2 and 5.3-3, below.

Table 5.3-2: Maximum Allowable Noise Exposure: Transportation Noise Sources

Land Use	Outdoor Activity Areas[1]	Interior Spaces	
	Ldn/CNEL, dBA	Ldn/CNEL, dBA	Leq, dBA[2]
Residences, Hotels and Motels, Hospitals, and Nursing and Personal Care	60[3]	45	--
Public Assembly and Entertainment	--	--	35
Offices	60[3]	--	45
Churches, Meeting Halls, Schools, Libraries and Museums	--	--	45
Outdoor Sports and Recreation	70	--	--

[1] Where the location of outdoor activity areas is unknown, the exterior noise level standard shall be applied to the property line of the receiving land use.
[2] As determined for a typical worst-case hour during periods of use.
[3] For other than residential uses, where an outdoor activity area is not proposed, the standard shall not apply. Where it is not possible to reduce noise in outdoor activity areas to 60 dB Ldn/CNEL or less using a practical application of the best available noise reduction measures, an exterior noise level of up to 65 dB Ldn/CNEL may be allowed provided that available exterior noise level reduction measures have been implemented and interior noise levels are in compliance with this table.

Table 5.3-3: Maximum Allowable Noise Exposure: Stationary Noise Sources[1]

	Daytime (7 a.m. to 10 p.m.)	Nighttime[2] (10 p.m. to 7 a.m.)
Hourly Leq, dBA[3]	50	45
Maximum Level, dBA[3]	70	65
Maximum Level, dBA - Impulsive Noise[4]	65	60

[1] As determined at the property line of the receiving land use. When determining the effectiveness of noise mitigation measures, the standards may be applied on the receptor side of noise barriers or other property line noise mitigation measures.
[2] Applies only where the receiving land use operates or is occupied during nighttime hours.
[3] Sound level measurements shall be made with slow meter response.
[4] Sound level measurements shall be made with fast meter response.

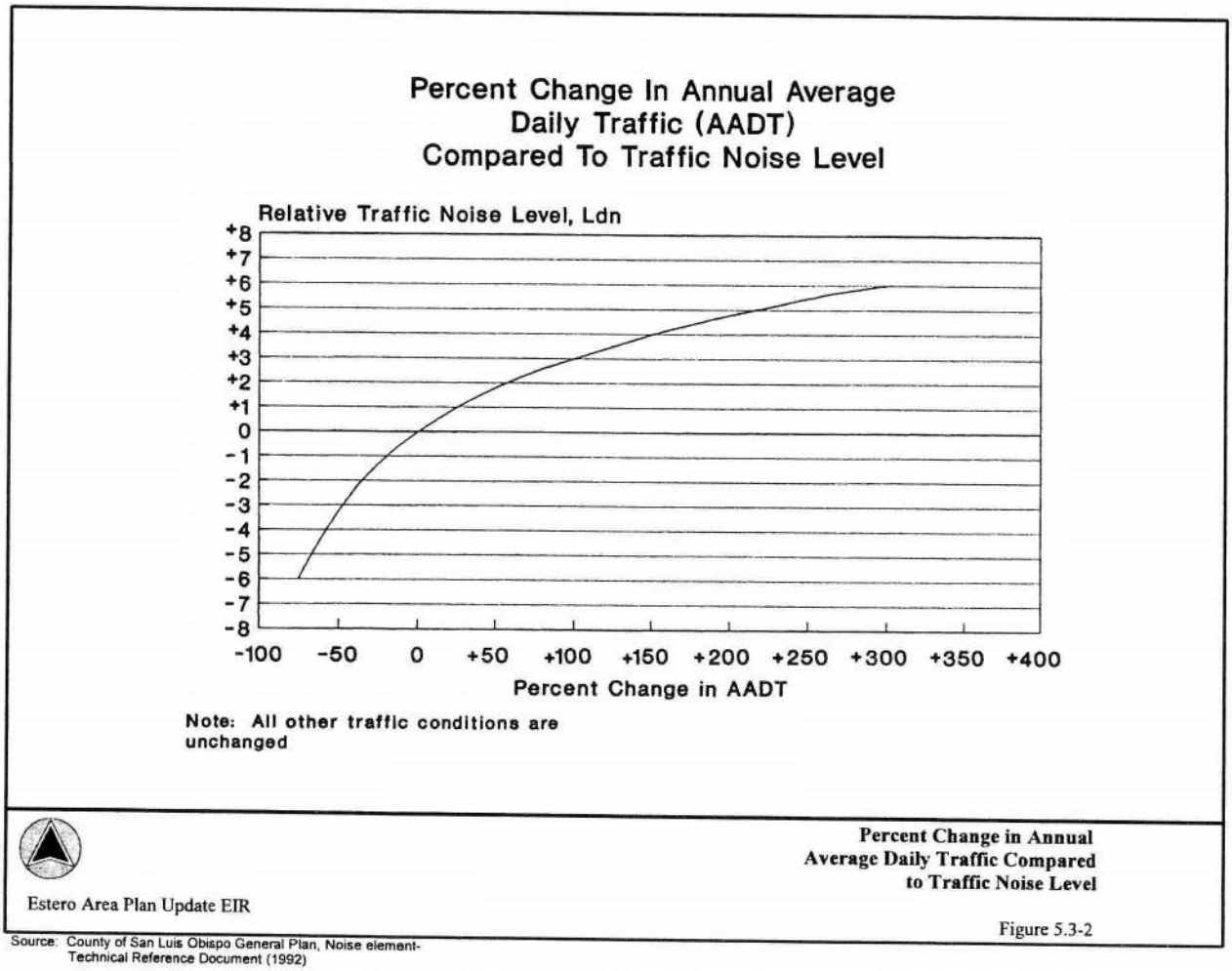


Figure 5.3-2 Percent Change in Annual Average Daily Traffic Compared to Traffic Noise Level

5.3.2 Methodology and Significance Thresholds

5.3.2.1 Methodology

This EIR attempts to quantify noise impacts associated with buildout of the Estero Area Plan. Traffic is the main source of noise in the Estero planning area, and is the main issue addressed in the following analysis. The County Noise Element (1992) provides existing and future noise contour maps for much of the Estero Area. "Existing" noise levels in the Noise Element are based on 1990 traffic levels, which generally differ from current (2003) traffic conditions. For the purposes of this analysis, current traffic levels were considered to be those reported in Section 5.1, "Transportation and Circulation." The corresponding traffic increases were compared against Figure 5.3-2 (Figure 3-2, Noise Element Technical Reference Document) to assess the overall increase from current 2003 noise levels.

Where an existing noise sensitive use would experience a perceptible increase in noise levels over the County thresholds as a result of the proposed Estero Area Plan, a significant impact would occur (refer to Table 5.3-4). A perceptible increase is defined as an increase in noise levels of greater than 3 dBA[1]. Long-term increases in noise levels of greater than 3 dBA are identified as usually perceptible, while changes of less than 1 dBA are generally not discernible to local residents or noise-sensitive land uses. Per the County Noise Element, roadways with an ADT of 5,000 or less and speed limits less than 50 mph were not considered, because noise contours on such roadways would be confined to areas much closer to the road than normal residential setbacks.

Table 5.3-4: Subjective Reaction to Changes in Noise Levels of Similar Sources

Increase in Sound Pressure Level, dB	Relative Increase in Acoustical Energy	Subjective Reaction
1	1.26 times	Minimum Detectable Change (Lab)
3	2.0 times	Usually Noticeable Change
5	3.2 times	Definitely Noticeable Change
10	10.0 times	Twice as Loud as Before
Sources: San Luis Obispo County Noise Element, 1992		

5.3.2.2 Significance Thresholds

The Noise Element contains policies that are applicable to all development in the County. The most relevant policies are shown below. Proposed development that does not conform to these policies constitutes a significant impact.

> **Policy 3.3.2** - "New development of noise-sensitive land uses shall not be permitted in areas exposed to existing or future levels of noise from transportation noise sources which exceed 60 dBA Ldn or CNEL (70 dBA Ldn or CNEL for outdoor sports and recreation) unless the project design includes effective mitigation measures to reduce noise in outdoor activity areas and interior spaces to or below the levels specified for the given land uses in Table 3-1" of the Noise Element.

[1] *Cal Poly Sports Complex Final EIR*, 1997.

Policy 3.3.3 - "Noise created by new transportation noise sources, including roadway improvement projects, shall be mitigated so as not to exceed the levels specified in Table 3-1 (Noise Element) within the outdoor activity areas and interior spaces of existing noise-sensitive land uses." This policy would apply to new road construction as proposed in Chapter 5, "Circulation" of the proposed Area Plan.

For the purposes of this report, the threshold of significance for existing noise sensitive uses will be a perceptible traffic noise increase over 60 dBA Ldn (because noise mitigation cannot be assured for existing development), and for proposed development, 70 dBA Ldn, per the County Noise Element.
Other policies include:

Policy 3.3.4 - "New development of noise-sensitive land uses shall not be permitted where the noise level due to existing stationary noise sources will exceed [a daytime Leq of 50 dBA and a nighttime Leq of 45 dBA]." This policy applies unless effective noise mitigation measures have been incorporated into the design of the development to reduce noise exposure to or below the level specified in Table 3-2 of the Noise Element.

Policy 3.3.5 - "Noise created by new proposed stationary noise sources or existing stationary noise sources which undergo modifications that may increase noise levels shall be mitigated as follows and shall be the responsibility of the developer of the stationary noise source.

a - Noise from agricultural operation conducted in accordance with accepted standards and practices is not required to be mitigated.

b - Noise levels shall be reduced to or below the noise level standards in Table 3-2 [of the Noise Element] where the stationary noise source will expose an existing noise-sensitive land use (which is listed in the Land Use Element as an allowable use within its existing land use category) to noise levels which exceed the standards in Table 3-2. When the affected noise-sensitive land use is Outdoor Sports and Recreation, the noise level standards in Table 3-2 shall be increased by 10 dB. Where the noise source is one of the following electrical substations which is not modified so as to increase noise levels, the noise standards shall instead be fifty dB between 10 p.m. and 7 a.m. and fifty-five dB between 7 a.m. and 10 p.m., determined at the property line of the receiving land use: [includes the Cayucos, Baywood, and the Highway 1 between the Men's Colony and Morro Bay electrical substations].

c - Noise levels shall be reduced to or below [a daytime Leq of 50 dBA and nighttime Leq of 45 dBA] where the stationary noise source will expose vacant land in the Agriculture, Rural Lands, Residential Rural, Residential Suburban, Residential Single-Family, Residential Multi-Family, Recreation, Office and Professional and Commercial Retail land use categories to noise levels in excess of [these standards]. This policy may be waived when the Director of Planning and Building determines that such vacant land is not likely to be developed with a noise-sensitive land use."

In addition, State CEQA Guidelines cite an impact as significant if a project will:

- Expose persons to or generate noise levels in excess of standards established in the local general plan or noise ordinance (cited above), or applicable standards of other agencies;
- Expose persons to or generate excessive groundbourne vibration or groundbourne noise levels;
- Create a substantial permanent increase in ambient noise levels above levels existing without the project; or,
- Create a substantial temporary or periodic increase in ambient noise levels above those existing without the project.

Project-by-project review of proposed development projects as part of the County permitting process ensures the implementation of the aforementioned policies. A substantial increase is defined as an audible increase, or 3 or more decibels.

5.3.3 Proposed Project Impacts and Mitigation Measures

5.3.3.1 Area-Wide Impacts

Impacts associated with noise are difficult to quantify at the area plan level. Site-specific factors such as topography and proposed and surrounding land uses vary and affect potential impacts to a great degree. More specific detail regarding noise impacts can be found in Section 5.3.3.2, "Community-specific Impacts" below, and impacts will be further assessed on a project-by-project basis through acoustical analyses as required by the County Noise Element and the site-specific permitting process.

The greatest source of noise in the Estero Area will continue to stem from vehicular sources. The following table provides information on existing and projected traffic volumes, and resulting noise increases. The following is based on Figure 3-2 in the Technical Appendix of the County Noise Element, which relates relative traffic noise to percent change in ADT. In general, a 100% increase in ADT is required before an increase becomes generally audible.

Table 5.3-5: Noise Increases on Area Roadways

Roadway	ADT Existing	ADT Future	Difference	Percent	Resulting dBA increase	Significant ?
Highway 1 - Morro Bay	24,500	33,500	9,000	36	1.5	NO
Highway 1 North of Morro Bay	16,700	18,600	1,900	11	0.5	NO
Highway 41	8,800	12,600	3,800	43	1.5	NO
LOVR (east of South Bay)	14,539	27,100	12,561	86	>2.5	NO
LOVR (west of South Bay to Ninth)	17,280	29,800	12,520	72	>2.5	NO
LOVR (west of ninth)	11,910	16,300	4,390	37	<1.5	NO
Santa Ysabel (west of SB Blvd)	7,480	13,800	6,320	85	>2.5	NO
South Bay (N/O LOVR)	11,920	18,100	6,180	52	>1.5	NO
Ninth (Ramona to LOVR)	6,650	10,700	4,050	61	2	NO

Impact N-1: Potential Adverse but Mitigable Impact to Existing and Planned Noise-Sensitive Land Uses in the Estero Planning Area from Roadways.

Special Policies, Programs & Standards

The County Noise Element contains a policy that could mitigate existing (and cumulative) noise impacts.

> **Policy 3.3.6** - San Luis Obispo County shall consider implementing mitigation measures where existing noise levels produce significant impacts to noise-sensitive land uses or where new development may result in cumulative increases of noise upon noise-sensitive land uses.

Furthermore, the proposed Estero Area Plan includes planning area standards and policies which may indirectly reduce noise impacts on existing and planned noise sensitive land uses. Generally, these standards and policies, together with Local Coastal Plan provisions, would do so by:

- Limiting the types and range of land uses allowed in a specific land use category or geographical area (e.g., limiting the range of activity allowed in the Recreation land use category, with the effect of precluding some uses that can be notable noise sources, such as off-road vehicle parks, public assembly and entertainment, temporary events, etc.); or
- Requiring discretionary entitlements for specific land uses or types of development, thereby invoking full CEQA review of individual projects and enabling full consideration of the noise impacts of proposed projects during the review process, that would otherwise not have been required without the Planning Area Standard (in the Coastal Zone, most uses, especially those that could generate noise, already require discretionary approval); or
- Minimizing vehicular travel.

The following table provides examples of policies and standards in the proposed Estero Area Plan that can reduce impacts from noise. The proposed Area Plan includes numerous policies such as these which may indirectly reduce noise impacts.

Table 5.3-6: Noise-Reducing Planning Area Policies & Standards (not all-inclusive)

Area Of Applicability	Title/Description of Standard	Page
Rural Area	3. Maintain existing land use categories and agricultural use	4-8
Rural Area / Agriculture	3. Prevent further urban or suburban development	4-9
Los Osos / All Categories	4. Encourage development of media links and other networks to permit business without commuting	4-40
Los Osos / Commercial	4. Promote pedestrian travel and activities	4-48
Rural Area / Open Space	A.2. Permit Requirement	7-39

Existing Noise-sensitive Land Uses.

Generally, the greatest potential impacts to existing noise-sensitive land uses in the Estero planning area will stem from increased traffic volumes. Traffic volumes would increase an average of 50 percent in each of the planning sub-areas as a result of future development under the proposed Area Plan. This could result in road-specific impacts on existing residences throughout the planning area. Temporary noise increases from construction activities could also adversely impact existing residences in the planning area. Construction impacts for all areas are considered significant, but mitigable. Potential impacts associated with increased traffic are discussed in §5.3.3.2 "Community-specific Impacts" below.

No major stationary noise sources exist in the Estero planning area. The Duke power plant in Morro Bay does not generate noise at a level sufficient to create impacts in the Estero planning area. Therefore, no noise conflicts are expected to occur with any such sources. Noise impacts from substations, as discussed in §5.3.2, "Significance Thresholds" above, are not considered significant because of existing regulatory constraints.

Future Development.

Implementation of the proposed Estero Area Plan would result in a variety of land use changes. Under the proposed plan, acreage within the Rural Lands, Residential Suburban, Recreation, Open Space, Commercial Retail and Public Facilities land use categories would increase. The land area in the Agriculture category would decrease. Where a noise-sensitive use would replace a less sensitive use (for example, where residential uses replace agriculture), there would be a potential for noise impacts if the noise-sensitive use is proposed for an area subject to high noise levels from auto/truck traffic or stationary noise sources. The potential for such impacts to occur has been evaluated on an area-by-area basis below.

5.3.3.2 Community-Specific Impacts

The Noise Element of the San Luis Obispo County General Plan (1992) contains existing noise contour maps for much of the Estero planning area. Sections of the planning area that have not been surveyed generally do not experience noise at levels of concern, or they have site-specific factors (such as agricultural qualities) which limit potential impacts. Future noise levels were assessed based on projected ADT from §5.1, "Transportation and Circulation" adjusted for current (2003) traffic conditions.

a. Rural Estero.

Impact N-2: Increased traffic volumes in the Rural Estero Area associated with buildout under the proposed Estero Area Plan will increase ~~in~~noise ~~levels~~ exposure to planned and existing noise sensitive land uses. This impact is considered adverse but less than significant (Class III).

Special Programs, Policies and Standards

The proposed Estero Area Plan does not contain policies or standards specific to the problem of noise. As mentioned in §5.3.3.1 "Area-wide Impacts" above, some policies may indirectly reduce future noise impacts through traffic reduction and land use category consistency.

Potential noise impacts in the rural portions of the Estero planning area would typically result from increased traffic levels in areas of existing and planned residential development in close proximity to the planning area's major highways and roads, including Highway 1, Highway 41, and Los Osos Valley Road. Currently, existing noise sensitive uses within 190 and 478 feet of the centerline of Highway 1 west of Cayucos and east of Morro Bay, respectively, experience noise levels at or exceeding the 60 dBA threshold. Existing uses within 178 feet of the centerline of Highway 41 (particularly the mobile home park near the outskirts of the City of Morro Bay) experience levels at or exceeding the 60 dBA threshold. The only other major roadway in the area is Los Osos Valley Road. Existing noise sensitive uses within 293 feet of the centerline of this road (technically a few scattered agricultural residences) experience levels at or exceeding the 60 dBA threshold. Traffic resulting from

buildout will not be sufficient to create an audible increase in roadway noise as defined in the significance thresholds established above; therefore, impacts associated with increased traffic noise to existing noise-sensitive uses are less than significant (Class III).

As discussed in §5.3.2.2, "Significance Thresholds," 70 dBA Ldn is the level at which thresholds are exceeded for proposed development. In most cases, the 70 dBA Ldn contour is closer to the road than normal residential setbacks. For most roads within the Rural Area, this contour is within the road right-of-way. The two potential exceptions are Highway 1 east of Morro Bay, where the existing noise contour is 103 feet from the centerline of the road, and Los Osos Valley Road, where the existing 70 dBA contour lies 63 feet from the centerline. However, at buildout under the proposed Area Plan, noise levels in these areas would increase by 1.5 and 2.5 dBA, respectively. Neither of those increases exceeds significance thresholds. Also, in the rural areas, parcels are generally large enough so that new noise sensitive development can be set back outside of the 70 dBA contour. The rural area west of Cayucos is well outside the existing contour line along Highway 1.

Generally, where residential uses are exposed to exterior noise levels of 70 dBA Ldn or less from transportation noise, noise impacts to future development can be mitigated through building placement and design, and the installation of berms and other sound barriers. Excessive noise in outdoor areas is more difficult to mitigate, but careful building placement may help reduce noise levels in outdoor areas as well. All of these potential design factors are regulated by the County Noise Element, and would be required as part of the acoustical analysis and permitting process. Therefore, impacts to future residential and other noise-sensitive land uses are considered to be less than significant, because of mitigation incorporated below and as part of the County permitting process (Class II).

b. Cayucos Area.

Impact N-3: Buildout ~~as delineated in~~ under the proposed Estero Area Plan would increase traffic noise levels in the Cayucos Area. This impact is considered adverse but ~~creating~~ less than significant ~~impacts to existing and planned noise-sensitive land uses~~ (Class III).

Special Policies, Programs, and Standards

The proposed Estero Area Plan does not contain policies or standards specific to the problem of noise. As mentioned in §5.3.3.1 "Area-wide Impacts'" above, some policies may indirectly mitigate future noise impacts through traffic reduction and land use category consistency.

Highway 1 is the only roadway anticipated to generate any potentially significant noise levels in the Cayucos Area. Existing noise-sensitive development within 190 feet (north of Old Creek Road) to 370 feet (south of Old Creek Road) of the Highway centerline, the location of the 60 dBA Ldn noise contour, will experience noise level increases of less than 3 dBA. The impact is less than significant.

The proposed 10-acre parcel on the northern portion of town will most likely be developed for residential use. This site is unique because it is separated from the highway by a large hill, which could reduce potential noise levels as much as 20 dBA[2]. Because this site is proposed for future development, an acoustical analysis of the site will be completed by the County as part of the permitting process. Impacts associated with noise on this site will be less than significant due to topography. Mitigation measure N-11, below, would most likely eliminate any potential impacts. This impact would be assessed on a project-specific basis at such time development is proposed.

[2] Caltrans, Technical Noise Supplement, October 1998.

c. Los Osos

Impact N-4: Buildout as delineated in the proposed Estero Area Plan would expose existing and future noise-sensitive land uses in the Los Osos Area to increased levels of noise. This impact is considered adverse but less than significant (Class III).

Special Programs, Policies and Standards

The proposed Estero Area Plan does not contain policies or standards specific to the problem of noise. As mentioned in §5.3.3.1 "Area-wide Impacts"' above, some policies may indirectly mitigate future noise impacts through traffic reduction and land use category consistency.

Roadways in the Los Osos area that have the potential to cause significant impacts to existing and planned noise-sensitive development are Los Osos Valley Road and South Bay Boulevard. Much of the roadway of South Bay Boulevard is lined by berms and small hills, or the roadway is elevated above existing homes. Both of those factors help to reduce potential impacts. This analysis does not take those features into account. However, the reader should keep in mind the varying topography and site characteristics which influence noise levels. Other roads in the area, including 9th Street and Santa Ysabel Avenue do not have traffic increases at buildout under the proposed Area Plan of a sufficient magnitude to register a perceptible noise increase (traffic increases for these roads are on the order of less than 5 percent).

Existing noise sensitive uses within 223 feet of the centerline of South Bay Boulevard, 252 feet of the centerline of Los Osos Valley Road east of South Bay Boulevard, 158 feet of the centerline of Los Osos Valley Road between South Bay Boulevard and 9th Street, and 106 feet of the centerline of Los Osos Valley Road west of 9th Street experience noise levels at or exceeding 60 dBA. Traffic increases associated with implementation of the proposed Estero Area Plan would result in noise level increases of 1.5 and 2.5 dBA on South Bay Boulevard and Los Osos Valley Road, respectively. These increases are less than significant.

d. Other Watershed

The watershed area contains limited development, most of which is associated with the California Men's Colony and Camp San Luis Obispo. Noise-sensitive uses in the area include Cuesta College and El Chorro Regional Park. Major noise sources in this area are restricted to periodic operations at Camp San Luis Obispo including military helicopter flights, and traffic noise from Highway 1. Because Cuesta College is set back from Highway 1, no noise conflicts are anticipated to occur. Most of El Chorro Regional Park, except for the baseball field, is separated from the Highway by berms, natural hills and distance, which all serve to reduce potential noise impacts. Impacts in this area are not considered to be significant.

e. Cayucos Fringe

The Cayucos Fringe area is sparsely developed, mountainous territory with no major noise sources. No noise conflicts are anticipated to occur in this area.

5.3.3.3 Mitigation Measures

The measures described in this section would mitigate both project-specific and cumulative noise impacts. General mitigation described below would also help alleviate impacts on existing noise-sensitive uses, as would measures intended to reduce traffic noise. It is important to note that this analysis only considers exacerbation of noise levels, and that the following measures are not intended to mitigate existing noise conflicts.

Existing Regulations

The Noise Element states that if mitigation of noise impacts is necessary for new development, it shall be achieved by: a) carrying out an acoustical analysis or b) implementing standard noise mitigation packages contained in the Acoustical Design Manual. The Acoustical Design Manual (Volume III of the Element) contains a noise mitigation package designed to mitigate both interior and exterior noise levels. Large-scale projects and/or projects to be sited in areas with complex noise characteristics require project-specific analysis and mitigation design by an acoustical expert.

Interior Noise Mitigation. The following standardized noise mitigation packages are contained in the Noise Element and are important to maintain as County requirements. These packages are examples of measures that should reduce noise inside a single family dwelling, office, church or meeting hall to acceptable levels.

If the Exterior Noise Level is 60-65 dBA Ldn/CNEL - Air conditioning or a mechanical ventilation system; Windows and sliding glass doors mounted in low air infiltration rate frames (0.5 cfm or less, per ANSI specifications); Solid core exterior doors with perimeter weather stripping and threshold seals.

If the Exterior Noise Level is 65-70 dBA Ldn/CNEL - The same as N-9; Exterior walls consist of stucco or brick veneer. Wood siding with a ½" minimum thickness fiberboard ("soundboard") underlayer may also be used; Glass in both windows and doors should not exceed 20% of the floor area in a room; Roof or attic vents facing the noise source should be baffled (see Appendix C in County Noise Element Acoustical Design Manual for an example).

If the Exterior Noise Level is 70-75 dBA/CNEL - The same as N-10; The interior sheetrock of exterior wall assemblies should be attached to studs by resilient channels. Staggered studs or double walls are acceptable alternatives; Window assemblies should have a laboratory-tested STC rating of 30 or greater.

In addition to the mitigation procedure provided in the Noise Element, the following mitigation measures should be implemented.

~~General~~ Additional Measures

In addition to the Noise Element-mandated measures described above, the following measures should be implemented to mitigate general impacts throughout the planning area:

a. *Short-term.* The following measures are recommended to reduce short-term noise impacts associated with individual project construction:

N-1. **Equipment Maintenance.** All construction equipment shall be in proper operating condition and fitted with factory standard silencing features.

N-2. **Dirt-Hauling Route Orientation.** Dirt hauling routes shall be oriented away from existing noise-sensitive land uses.

N-3. **Vehicle Staging Area Siting.** Stockpiling and vehicle staging areas shall be located as far as practical from occupied structures.

N-4. **Portable Noise Barriers.** Temporary portable noise barriers shall be erected between sensitive structures and construction areas during those activities that utilize high noise generating equipment, unless the construction activity would be of short duration (a few days). These temporary barriers could reduce noise levels by approximately 3 to 5 dBA, depending upon the materials used to erect such a feature. Non-noise generating construction activities, such as interior painting, would not be subject to this restriction.

b. *Long-term.* The following measures are recommended to further reduce general adverse noise conditions that would result from implementation of the proposed Estero Area Plan.

N-5. **Acoustical Shielding.** Noise impacts from mechanical and electrical equipment, such as ventilation or air-conditioning units shall be minimized by locating equipment away from receptor areas, installation of equipment with proper acoustical shielding, and including the use of parapets into building designs. Moreover, the use of block sound attenuation walls, greenbelts, and/or setbacks shall be required at boundary lines between commercial/industrial and sensitive uses.

N-6. **Loading Dock Time Restrictions.** If noise problems should arise from loading dock operations within commercial and industrial land use areas, deliveries shall be restricted only to hours permitted by the County of San Luis Obispo. It is suggested that loading dock operations near noise-sensitive receptors be prohibited during the nighttime hours.

N-7. **Commercial and Industrial Facility Design.** Design of new commercial and industrial facilities adjacent to residential land uses shall site truck loading areas, garbage dumpsters, and loudspeaker systems away from adjacent residential property lines. Sound attenuation walls or landscaped setbacks shall be required at property lines between commercial/industrial and residential uses.

~~c. *Interior Noise Mitigation.* The following standardized noise mitigation packages are contained in the Noise Element and are important to maintain as County requirements. These packages are examples of measures that should reduce noise inside a single family dwelling, office, church or meeting hall to acceptable levels.~~

~~N-8. **If the Exterior Noise Level is 60-65 dBA Ldn/CNEL** - Air conditioning or a mechanical ventilation system, Windows and sliding glass doors mounted in low air infiltration rate frames (0.5 cfm or less, per ANSI specifications), Solid core exterior doors with perimeter weather stripping and threshold seals.~~

~~N-9. **If the Exterior Noise Level is 65-70 dBA Ldn/CNEL** - The same as N-9, Exterior walls consist of stucco or brick veneer. Wood siding with a ½" minimum thickness fiberboard ("soundboard") underlayer may also be used, Glass in both windows and doors should not exceed 20% of the floor area in a room, Roof or attic vents facing the noise source should be baffled (see Appendix C in County Noise Element Acoustical Design Manual for an example).~~

~~N-10. **If the Exterior Noise Level is 70-75 dBA/CNEL** - The same as N-10, The interior sheetrock of exterior wall assemblies should be attached to studs by resilient channels. Staggered studs or double walls are acceptable alternatives, Window assemblies should have a laboratory-tested STC rating of 30 or greater.~~

The reader should note that the above mitigation are typically imposed upon projects as part of specific County approvals.

Site-Specific Measures

N-11. **Proposed Recreation Category (North Cayucos Area).** A site-specific acoustical analysis shall be performed for proposed development in this area.

5.3.4 Cumulative Impacts

The proposed Estero Area Plan would guide long-range land development patterns in the planning area. As a

result, cumulative impacts are considered to be equivalent to those analyzed above.

5.3.5 Residual Impacts

In general, implementation of County noise policies and the recommended mitigation measures would help to further reduce noise impacts to existing and proposed land use categories.

5.4 Water Resources



The following section analyzes impacts to local surface and groundwater supplies associated with implementation of the proposed Area Plan. Water supply is the most important and limiting resource for development in the Estero Area.

A measure of uncertainty in this analysis stems from the undeveloped areas surrounding the community of Cayucos, namely the "Cayucos Hillsides", a collection of paper lots which may be developed in the future. It is unknown how many of these lots will be developed, and which water source would serve future residents. Much of the area is geologically unstable, and is therefore infeasible for development. For the purposes of this EIR, water demand calculations do not include potential use at the Cayucos Hillsides, because the potential for development is too speculative.

5.4.1 Setting

5.4.1.1 Existing Conditions

a. Area-Wide Water Sources.

Surface Water Supplies. The Estero planning area and its associated secondary study areas receive surface water supplies from three sources: the coastal branch of the State Water Pipeline, Chorro Reservoir and Whale Rock Reservoir near Cayucos.

The Coastal Branch Pipeline, which was completed in 1997, currently provides state water allotments to the City of Morro Bay and several other entities outside of the Estero planning area. A breakdown of distribution within the study area is summarized in Table 5.4-1. California Men's Colony (CMC), the County Operational Center (COC) and Cuesta College, are allocated a total of 1,025 AF/Y. CMC allocations are currently supplying Dairy Creek Golf Course.[1] According to personnel at these facilities, current demand from the State Water Project totals 685 acre feet per year . COC has used an average of 85 AF/Y of their allocation in recent years.[2] CMC has used their total allocation of 400 AF each year.[3] Cuesta College forfeits 40 acre feet of their allotment to CMC and uses 160 acre feet onsite.[4]

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1 Mark Hutchinson, County of San Luis Obispo Dept. of Planning and Building pers. comm.

2 Doug Bird, San Luis Obispo County PublicWorks. Personal Communication. July 9, 2003.

3 John Kellerman, plant supervisor. California Men's Colony. Personal Communication. July 8, 2003.

4 Terry Reece, director, maintenance, operations and grounds. Cuesta College. Personal Communication. July 24, 2003.

Table 5.4-1: State Water Entitlements

Name	Water Allotment (AF/Y)
California Men's Colony*	400
County Operational Center*	425
Cuesta College*	200
Morro Bay	1,313
Total:	**2,338**

Source: County of San Luis Obispo, Engineering Department, 1999.

Note: (*) indicates outside Estero, within "Other Watershed" secondary study area.

Chorro Reservoir is located toward the eastern end of the Morro Bay watershed northeast of the California Men's Colony in the Other Watershed secondary study area. Water in storage in the reservoir, augmented by water from Whale Rock Reservoir (refer to discussion below), supplies the needs of CMC, Camp San Luis Obispo, COC, the County Education Center, Achievement House and two private properties. The facilities are shown in Figure 5.4-1. The wastewater generated by the treatment plant serving these clients is released to Chorro Creek where it contributes to the safe yield of the Chorro Creek groundwater basin.[5]

Whale Rock Reservoir is operated by the City of San Luis Obispo under the direction of the Whale Rock Commission. The City of San Luis Obispo holds rights to most of the water at the Reservoir and much of the available supply is exported from the planning area. However, approximately 600 AF/Y are allocated to the community of Cayucos to serve municipal needs in that area. Additionally, public facilities in the Other Watershed area (discussed above) hold rights to 1,025 AF/Y. Actual use of this allocation is in question because of the availability of State and other water supplies. Generally, public facilities in the Other Watershed rely primarily on Chorro Reservoir with Whale Rock available for backup and maintenance of flows in Chorro Creek.[6]

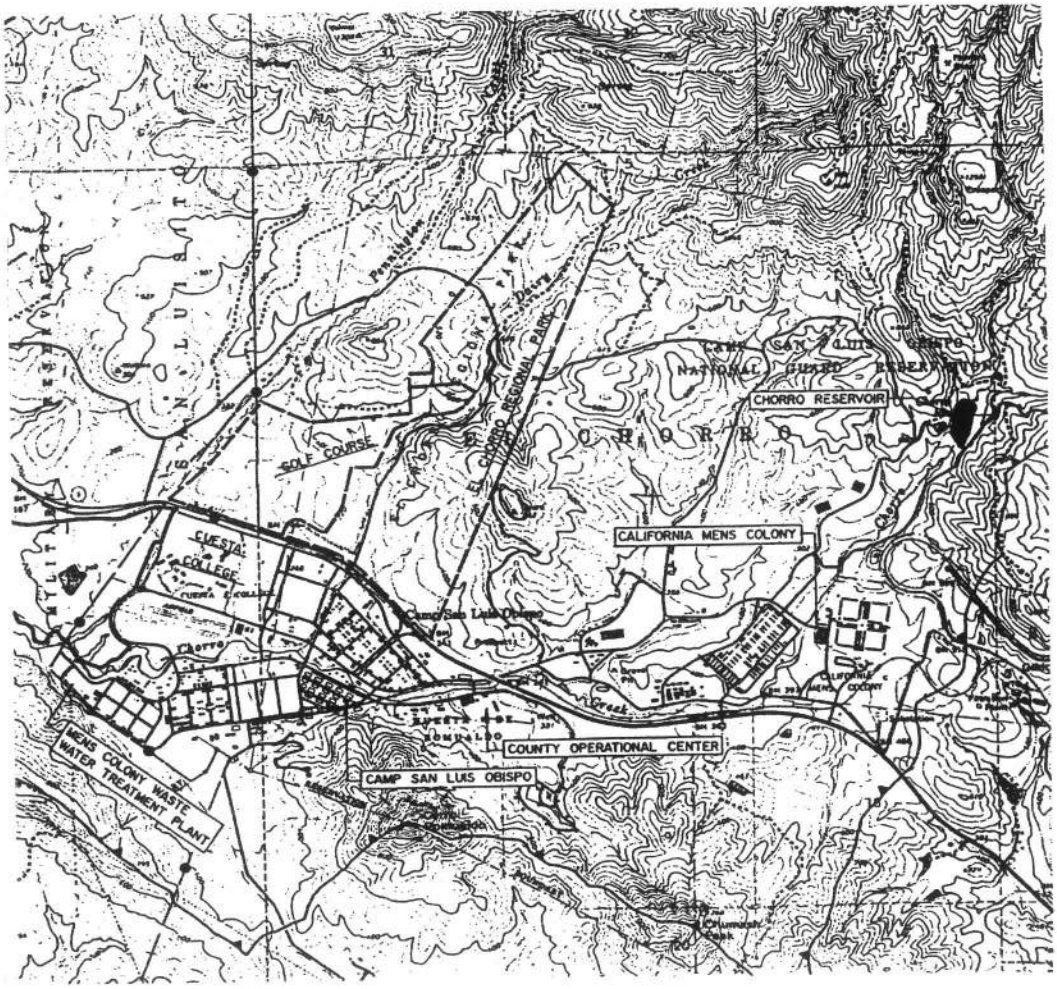
Groundwater Supplies. Planning and secondary study area water supplies are primarily obtained from the groundwater basins of several local coastal streams. The Estero Area encompasses the Villa, Cayucos, Old, Toro, Morro, Chorro, and Los Osos Creek Basins, most of which are utilized for groundwater pumpage. Available storage and safe annual yield for each basin is described below and is summarized in Table 5.4-2, and the basins are depicted in Figure 5.4-2.[7] The total storage capacity of the seven creek basins within the Estero Area is 35,506 acre-feet and the safe annual yield of these basins is estimated at 9,281-9,661 AF/Y. The range in total safe annual yield is due to differing estimates of the safe annual yield of the Los Osos Creek Basin with and without a community wastewater facility.

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5 County of San Luis Obispo, *Estero Area Plan Update, Service Level Survey Background Report*, August 1994.

6 Mark Hutchinson, County of San Luis Obispo Dept. of Planning and Building pers. comm.

7 A safe annual yield refers to "the average annual amount of groundwater that can be extracted from a groundwater basin over a long period of time without developing a net change in storage of fresh water."



Chorro Reservoir Service Area

Estero Area Plan Update EIR

Figure 5.4-1 Chorro Reservoir Service Area.

Table 5.4-2: Estero Area Groundwater Basins - Storage Availability and Safe Annual Yield

Basin	Usable Storage (AF)	Safe Annual Yield (AF/Y)
Villa Creek	2,200	1000
Cayucos Creek	1,300	600
Old Creek	1,500	330
Toro Creek	1,000	591
Morro Creek	7,000	1,500
Chorro Creek	7,000	1,700
Los Osos Creek	14,506	3,560/3,940
Total	**35,506**	**9,281/9,661**

Source: *Estero Area Plan Update*, 2003. pg. 3-10

- **Villa Creek Basin**. The Villa Creek basin forms the northern boundary of the plan area, serves the agricultural needs of the Cayucos Fringe secondary study area, and is estimated to have a total available storage of 2,200 acre-feet and a safe annual yield of 1,000 acre-feet.[8]

- **Cayucos Creek Basin**. The Cayucos Creek basin includes Cayucos Creek which serves the agricultural and residential needs of the Cayucos Fringe secondary study area. The total usable capacity of the Cayucos basin is 1,300 acre-feet and the safe annual yield is approximately 600 acre-feet.[9]

- **Old Creek Basin/ Whale Rock Reservoir**. The Old Creek basin lies northeast of the community of Cayucos and includes areas up and downstream of Whale Rock Reservoir, located at the confluence of Old Creek and Cottontail Creek. The total usable capacity of the Old Creek basin upstream of Whale Rock Reservoir is estimated at 1,500 acre-feet and the safe annual yield has been reported as approximately 330 acre-feet.[10] However, the "Constraints Analysis" prepared for this EIR states that supplies from this basin are associated with Whale Rock Reservoir. Whale Rock Reservoir provides not only surface water to the City of San Luis Obispo and associated consumers but also a negligible amount of groundwater recharge to the Old Basin below the dam which was historically pumped for use by Cayucos. Installation of a surface water treatment system has replaced this method of water extraction. Therefore, neither supplies upstream of Whale Rock nor recharge to the Old Basin below the Whale Rock dam will be included in this discussion of water supply for the Estero Area. As stated above, total allocations of reservoir water to the community of Cayucos and public facilities in the Other Watershed area are 600 AF/Y and 1,025 AF/Y, respectively.

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8 *San Luis Obispo County Master Water Plan Update*, 1998. It should be noted that there are many documents available that represent studies of ground and surface water in and around the Estero planning area. Some discrepancies in data are encountered among these reports, and may contradict information found in this EIR. In most cases, figures found in this report represent the latest available information.

9 *Ibid.*

10 *Ibid.*

- **Toro Creek Basin.** The Toro Creek basin is located approximately 0.5 miles north of the City of Morro Bay and serves the agricultural and rural residential needs of the Cayucos Fringe secondary study area. It is estimated to have a total usable capacity of approximately 1,000 acre-feet and a safe annual yield of 591 acre-feet.[11]

- **Morro Creek Basin.** The Morro Creek basin includes Morro Creek and areas of coastal alluvial soils north of the creek mouth. Morro Creek Basin serves the City of Morro Bay, and irrigated agriculture in the Morro and Little Morro Valleys. The total usable capacity of the basin is unknown, although the basin's safe annual yield is estimated to be 1,500 acre-feet.[12]

- **Chorro Creek Basin.** The Chorro Creek Basin is oriented in an east-west direction along Highway 1. The basin includes Chorro Creek which drains into the northern portion of Morro Bay. This basin serves the City of Morro Bay, Morro Bay Golf Course, and Chorro Valley agricultural water consumers. The total usable water capacity of the basin is estimated as approximately 7,000 acre- feet, and the basin's safe annual yield is estimated to be 1,700 acre-feet.[13]

- **Los Osos Creek Basin.** The Los Osos Creek Basin contains Los Osos Creek which drains the Los Osos and Clark Valleys westward to the southern portion of Morro Bay. This basin serves agricultural needs in Los Osos Valley, and South Bay domestic uses. The estimated usable storage capacity is approximately 14,506 acre-feet, and the basin's safe-yield is estimated to be 3,560/3,940 acre-feet,[14] based on use of existing septic systems or installation of the proposed treatment plant, respectively. The current understanding of the basin depicts a shallow upper aquifer whose water is of low quality due primarily to septic system effluent, and a larger lower aquifer with higher quality water. The latter is the source of groundwater withdrawals for the community. When the sewer is complete, as it is currently contemplated, effluent released into the upper aquifer will be reduced, and a greater quantity will recharge the lower aquifer.

b. Current Water Consumption

Planning Area.
Current water consumption within the Estero planning area is associated with agricultural, urban, rural, and nonresidential uses. Water consumption associated with agricultural use was calculated based upon existing agricultural acreage. Water consumption and water use projections within the planning area were based upon water demand calculations used in the "Facilities, Services, Resources" section of the Estero Area Plan.

Rural Estero.
Water use in the Rural Estero is associated with agricultural and rural residential consumption. Water for this area is withdrawn from the Los Osos, Morro and Chorro Creek Basins, and totaled 3,634 AF/Y in 2000. The demand figure for this basin overlaps with the figures for the Los Osos Basin, and is based on calculations performed for the 2000 Draft EIR. For more information on issues surrounding groundwater in the Los Osos basin, refer to the discussion under the Los Osos Area below. This data is considered representative of current conditions because of the negligible amount of development that has occurred in this area.

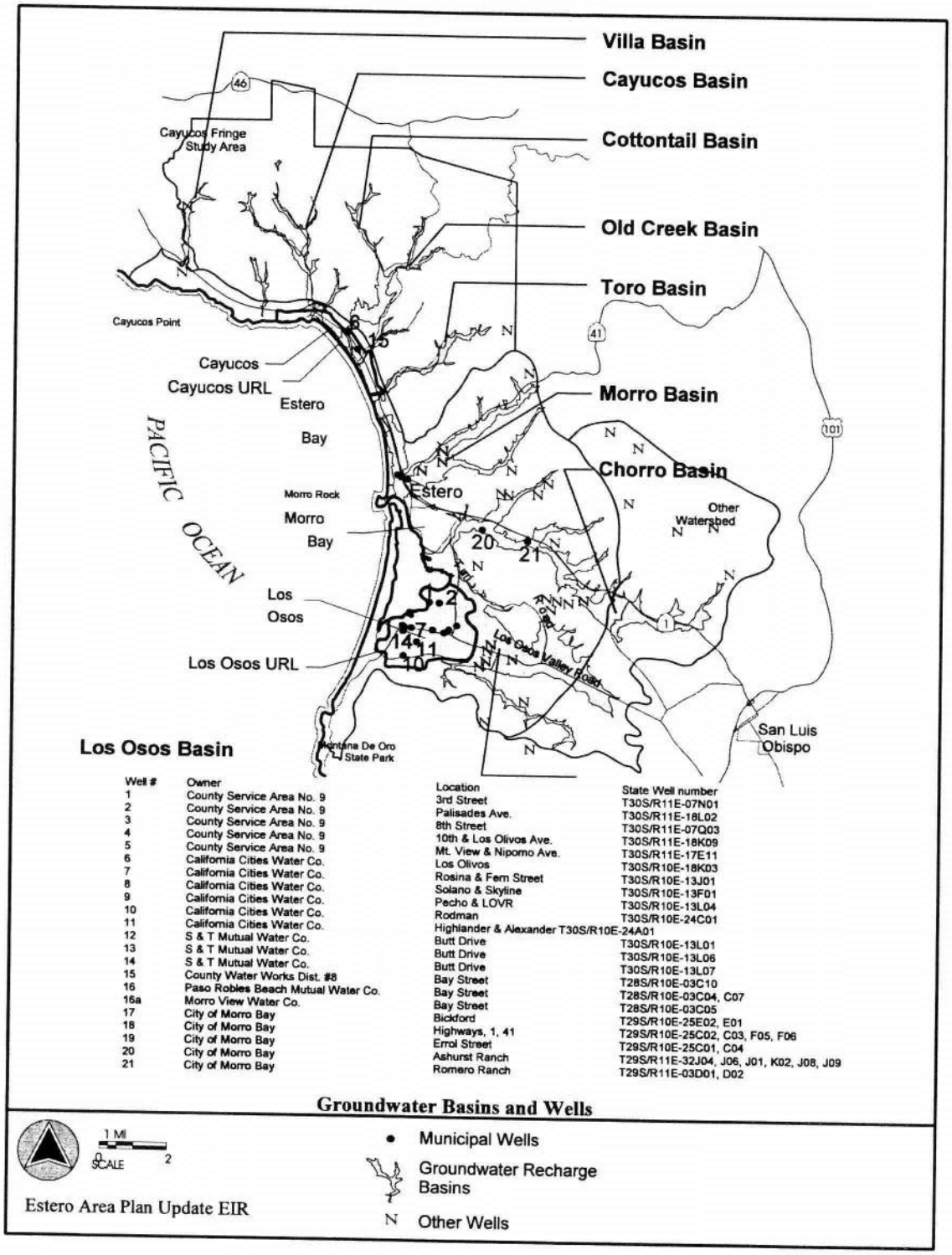
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11 *Draft Estero Area Plan Update*, 2003.

12 *Ibid.*

13 San Luis Obispo Department of Planning and Building, based on Cleath and Associates, 1993

14 Los Osos Community Service District (LOCSD). *Water Master Plan (2002).*



Well #	Owner	Location	State Well number
1	County Service Area No. 9	3rd Street	T30S/R11E-07N01
2	County Service Area No. 9	Palisades Ave.	T30S/R11E-18L02
3	County Service Area No. 9	8th Street	T30S/R11E-07Q03
4	County Service Area No. 9	10th & Los Olivos Ave.	T30S/R11E-18K09
5	County Service Area No. 9	Mt. View & Nipomo Ave.	T30S/R11E-17E11
6	California Cities Water Co.	Los Olivos	T30S/R10E-18K03
7	California Cities Water Co.	Rosina & Fern Street	T30S/R10E-13J01
8	California Cities Water Co.	Solano & Skyline	T30S/R10E-13F01
9	California Cities Water Co.	Pecho & LOVR	T30S/R10E-13L04
10	California Cities Water Co.	Rodman	T30S/R10E-24C01
11	California Cities Water Co.	Highlander & Alexander	T30S/R10E-24A01
12	S & T Mutual Water Co.	Butt Drive	T30S/R10E-13L01
13	S & T Mutual Water Co.	Butt Drive	T30S/R10E-13L06
14	S & T Mutual Water Co.	Butt Drive	T30S/R10E-13L07
15	County Water Works Dist. #8	Bay Street	T28S/R10E-03C10
16	Paso Robles Beach Mutual Water Co.	Bay Street	T28S/R10E-03C04, C07
16a	Morro View Water Co.	Bay Street	T28S/R10E-03C05
17	City of Morro Bay	Bickford	T29S/R10E-25E02, E01
18	City of Morro Bay	Highways, 1, 41	T29S/R10E-25C02, C03, F05, F06
19	City of Morro Bay	Errol Street	T29S/R10E-25C01, C04
20	City of Morro Bay	Ashurst Ranch	T29S/R11E-32J04, J06, J01, K02, J08, J09
21	City of Morro Bay	Romero Ranch	T29S/R11E-03D01, D02

Figure 5.4-2 Estero Groundwater Basins.

Cayucos.
Extractions from Whale Rock Reservoir for use in the Cayucos Area have remained fairly constant at 400 AF/Y for the past ten years.[15]

Los Osos.
Water is provided to the Los Osos area via groundwater extraction from the Los Osos Basin. The Regional Water Quality Control Board (RWQCB) has identified septic tank wastewater leaching as a water quality problem in this basin and future development in this area is constrained pending resolution of the wastewater disposal issues. The RWQCB action is intended to protect groundwater quality from further degradation that could result from domestic wastewater disposal. Water quality and water supply are interrelated in this region. There has been some dispute over the decades regarding water supply in the Los Osos groundwater basin USGS 1988, DWR 1989). To resolve these disputes and ensure growth takes place in accordance with available resources, Cleath and Associates is currently preparing a hydrogeologic study of the basin. The study is not yet complete; however, safe annual yield estimates presented herein are considered accurate.[16] The Los Osos CSD has prepared a Water Master Plan (August 2002) which examines the current state of water supply issues in the Los Osos Basin and provides strategies to ensure storage and distribution through buildout.[17] The plan identifies storage deficiencies as a major concern, and reiterates the benefits of a sewer system in terms of supply. Current estimates of safe annual yield total 3,560 AF/Y under present conditions, and 3,940 AF/Y with the development of the sewer project currently proposed. Ground water production from the overall basin (including agriculture) has exceeded the basin's safe yield in approximately half the years between 1985 and 2000. Total existing demand (agricultural, private rural wells, and urban domestic) is estimated at 3,380 AF/Y.[18] Localized problems with excessive pumping have resulted in sea water intrusion, while inadequate pumping in other areas has resulting in rising groundwater.[19] The Master Plan identifies means of resolving these concerns.

Secondary Study Areas.

NOTE: The most recent information regarding water use in the secondary study areas dates to the mid-90's and the preparation of the 2000 Draft EIR. Growth in the secondary study areas has been negligible and therefore this information is still considered representative.

Other Watershed.
The water supply situation in the Other Watershed Area is complicated by the number of sources available for use and the diversity of users. Consumption in this region is associated with rural residential dwellings, recreational use (Dairy Creek Golf Course) and public facilities. Public facilities in this area receive State Water at a total amount of 1,025 AF/Y from the City of San Luis Obispo in return for minimizing use of wells in the Chorro Creek basin. Because total current usage by these entities amounts to approximately 1,240 AF/Y,[20] public facilities in the Other Watershed cannot rely solely on State Water supplies. However, these entities still hold rights to water in Chorro Reservoir (refer to Figure 5.4-1) and most likely supplement supplies with that source

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15 *Draft Estero Area Plan Update*, 2003. pg. 3-16

16 Tim Cleath, pers. comm., July 28, 2003

17 http://www.losososcsd.org/watermasterplan/index.html

18 Cleath and Associates. Appendix to the *Water Master Plan*, 2002

19 *Draft Estero Area Plan Update*, 2003. pg. 3-20

20 County of San Luis Obispo. *San Luis Obispo Area Plan EIR*, 1995.

at a total of 215 AF/Y. Dairy Creek is currently supplied by Whale Rock water, and could be supplied with greywater in the event a system is approved. Rights to Whale Rock Reservoir for use by public facilities in the Other Watershed Area total 1,024 AF/Y, however, Whale Rock water is used as a last resort. Residences in the Other Watershed withdraw approximately 40 AF/Y from the Chorro Creek Basin, for an area total of 255 AF/Y from groundwater sources, and 1,025 AF/Y from surface (State Water) sources.

Cayucos Fringe.
The Cayucos Fringe encompasses the Villa, Cayucos, and Toro Creek Basins. Water consumption within the Villa Creek Basin is confined to agricultural and domestic water users. Approximately 450 acre-feet of water are withdrawn by agricultural users. (Based on 216 acres of irrigated land and three residential dwellings.)[21] Water use within the Cayucos Creek basin is limited to domestic and irrigated agricultural use within the Cayucos Valley. Approximately 116 acres of irrigated agricultural land exists within the basin. Annual water extraction from the basin is estimated at approximately 250 acre-feet.[22] It is important to note that the *Master Water Plan Update* (1998) cites a 350 AF/Y withdrawal from this basin in 1987. For the purpose of this report, the more recent figure (250 AF/Y) will be used. Water consumption within the Toro Creek basin is limited to domestic and agricultural use within Toro Valley. Annual water extraction from the basin is estimated at approximately 50 acre-feet.[23] Note that a withdrawal of 532 acre-feet was reported in 1987[24] but that for the purposes of this report, the more recent figure will be used.

Agricultural and rural residential water consumers in the Cayucos Fringe secondary study area currently withdraw a total of 750 AF/Y from area water supply basins.

City of Morro Bay.
Consumption within the City's service area during the past 6 years is shown in Table 5.4-3. Total consumption is discussed in terms of water use by customers within the city's incorporated area, including residential and commercial land use designations. Consumption has generally been decreasing since the late 1980's, and reached a low in 1998. Total consumption has increased steadily since that time.

The completion of the State Water Project's Coastal Pipeline Branch has made more water available to the Morro Bay community. State water allocations total more than 1,300 AF/Y for municipal and residential use. The City currently supplements less than 10 percent of its water with municipal wells, depending on the efficiency and availability of water in the State system. Additionally, Morro Bay is served by seawater extraction wells that serve the City desalinization facility in times of shortage.

Although the City of Morro Bay lies outside of the Estero planning area, it holds 1,758 AF/Y in stream allocations from the Chorro and Morro Creek basins. As previously discussed, the City currently receives its water from the State Water Project, but operational problems or peak usage days on the State Water System would stimulate the need to withdraw from the groundwater basins. In planning for the future of the Estero Area, it is important to keep in mind the impact that future Morro Bay water consumption could have on available water supply.

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21 San Luis Obispo County. *Estero Area Plan Update, Environmental Constraints Analysis*, Water Supply, 1994.

22 Ibid.

23 Ibid.

24 *San Luis Obispo County Master Water Plan Update*, August 1998.

Table 5.4-3. Total Water Consumption in Acre-feet Per Year (AF/Y): Morro Bay

Year	Surface Sources (AF/Y)	Groundwater (AF/Y)	Total Consumption (AF/Y)
1997	301	1,234	1,535
1998	1,288	38	1,326
1999	1,359	34	1,393
2000	1,396	4	1,400
2001	1,399[1]	11	1,410
2002	1,373	81	1,454

Source: Bill Boucher, City of Morro Bay Public Works. Personal Communication. July 8, 2003.

[1] The Coastal Branch of the State Water Pipeline Project was completed in September of 1997. Remaining water usage for the year is assumed to originate from this system

[2] Less than 10% of annual consumption is provided by municipal wells.

Environmental Demand.

The following discussion is excerpted in large part from the San Luis Obispo County Master Water Plan Update, August 1998.

Current Environmental Demand

Information on current environmental demand is available from two sources: 1) conditions on water rights permits and licenses and associated orders on file with the State Water Resources Control Board (SWRCB), and 2) agreements between the California Department of Fish and Game (CDFG) and other entities. The term "environmental demand" refers to restrictions or reservations of water supply either for the benefit of fish and wildlife or for other environmental reasons. Existing permit conditions which serve to protect the environment are in effect in the Old, Chorro and Los Osos Creeks in the Estero planning area. These include:

- ***Old Creek.*** "Subject to 'Agreement for Supply of Water from Whale Rock Reservoir to Cayucos Area Water Organizations'".

- ***Chorro Creek.*** "Flow in Chorro Creek is regulated by a series of MOUs between the CDFG and the California Men's Colony. An August, 1996 MOA calls for 180 AF of effluent to be released into Chorro Creek from May 1 to November 30 and stored water to be released on a prescribed schedule.

  There is also a 1 cfs (cubic foot per second) streamflow required below the reservoir on California National Guard property in the upper watershed. Under the license, 'The licensee shall release or bypass a flow of a least 1 cfs into the natural channel of Chorro Creek below the point of diversion...whenever the natural flow of the stream entering into the reservoir is two cfs or more'".

Furthermore, since the availability of State Water supplies, the City of Morro Bay has been required to cease diversions from at least seven municipal wells in the Chorro Creek Basin when downstream surface flows are less than 1.4 cfs.

- ***Los Osos Creek.*** Los Osos Creek has been fully declared appropriated by the SWRCB. No further allocations or permits for appropriation are available.

Future Environmental Demand

CDFG, as the primary agency responsible for the protection of fish and wildlife resources, is also charged with protecting the habitats associated with those species. This responsibility includes streams supporting protected and sensitive species. Potential means of protecting such resources may include:

- Reservation of 60% of the average annual unimpaired wet-season flow for instream habitat.
- Bypass of all natural flow during dry season (June to September).
- No diversions until the stream flows to the ocean (sandbar breached).

CDFG may consider requesting that the SWRCB re-open existing water rights. Re-allocation of water rights to augment instream reservations for environmental benefit under the public trust doctrine and State Fish and Game Code has some important recent legal precedence.

"The CDFG is currently developing a protocol for determining stream flow needs to protect environmental values. This protocol is under development and has not been formally accepted or even formally proposed."[24] Its inclusion in this EIR is for the purposes of noting a potential impact on future water supply and demand in the Estero planning area. This program would most likely involve agreements between the California Department of Fish and Game (CDFG), private entities, and other agencies as described above. In the Estero planning area, in-stream flow requirements associated with environmental demand could potentially apply to many of the coastal streams mentioned in previous sections. Although, for the purposes of this report, no quantification of environmental flow is considered, it is important to note that implementation of this program could affect future water supplies in the Estero planning area. The reader should note that the potential impact is somewhat reduced due to reliance on groundwater and reservoir sources for much of the planning area as opposed to instream flows.

c. Water Treatment and Distribution

Planning Area. Regions outside the jurisdiction of the City of Morro Bay receive their water from private companies or individual groundwater wells. Other outlying areas, including CMC, Cuesta College and Camp San Luis Obispo, receive water supplies primarily from the State Water Pipeline and Whale Rock Reservoir. The County Engineering Department oversees several waterworks districts and one County Service Area (C.S.A. #10) within the unincorporated area of the County. County water delivery systems consist of pumps, mains, and storage facilities.

Rural Area. Within the Rural Area, water for agriculture and domestic uses is supplied by privately-owned and operated wells or extraction systems from nearby streams. Systems in these regions are either not required to treat the water or utilize onsite water treatment.

Cayucos. Morro Rock Mutual Water Company, Paso Robles Mutual Water Association, and C.S.A. #10 (collectively the Cayucos Area Water Organizations (CAWO)) have historically used a groundwater recharge and extraction system below Whale Rock Dam in the vicinity of Old Basin. However, a surface water treatment system was installed in 1997 which has since all but replaced the extraction system. Wells operated by CAWO in the Old Basin now only obtain water from local runoff, and seepage or overflow from Whale Rock.[25] Allocations from the reservoir total 600 AF/Y. Allocations of Whale Rock water to these purveyors is as follows:

Table 5.4-4. Cayucos Area Water Purveyors

Purveyor	Allocation
Paso Robles Beach Water Association	222 AF/Y
Morro Rock Mutual Water Company	170 AF/Y
C.S.A. #10	190 AF/Y
Cayucos Cemetery District	18 AF/Y
Total	**600 AF/Y**

Source: *Draft Estero Area Plan Update*, 2003. p. 3-16

Los Osos. Water supply to the Los Osos area is provided by groundwater extraction from the Los Osos groundwater basin. Wells in this area supply municipal residential and commercial users. Treatment is provided by area water suppliers, including private companies (S and T Mutual Water and CalCities), and Los Osos Community Services District (LOCSD). As previously stated, this basin is considered to be in overdraft.

Other Watershed. Rural water use within the Other Watershed area is similar to that discussed for the Rural Area. Public facilities in this region receive water primarily from the State Water Project, the Chorro Reservoir, and Whale Rock Reservoir, in that order of priority.

Cayucos Fringe. Water use within the Cayucos Fringe Area is similar to that discussed for the Rural Area.

d. Potential Future Water Sources

San Luis Obispo County has a water entitlement of 17,500 AF/Y from Lake Nacimiento. The County is exploring the possibility of constructing a water delivery pipeline from Lake Nacimiento in cooperation with other water purveyors within the San Luis Obispo area. Fifteen agencies have expressed interest in and are participating in the environmental studies related to the acquisition of Lake Nacimiento water. The community of Cayucos (Morro Rock Mutual Water, Lewis Pollard Trust, and C.S.A. #10) could gain 160 AF/Y through its participation in the project. Table 5.4-5 shows the Estero Area agencies participating in the Nacimiento Water Project and the amount of water each is requesting.

[25] *San Luis Obispo County Master Water Plan Update*, 1998.

Table 5.4-5: Nacimiento Water Project Participants

~~Agency~~ Party	~~Agency~~ Amount (AF/Y)
County Service Area No. 10A Cayucos	80
Lewis Pollard Trust - Cayucos	50
Morro Rock Mutual Water Company - Cayucos	30
Total:	**160**

Source: Nancy Orton, County of San Luis Obispo Department of Planning and Building pers. comm., 2003.

The County Service Area No. 10A, operated by SLO county, is one of the three domestic purveyors in the coastal community of Cayucos. CSA 10A receives water from Whale Rock Reservoir per the terms of the March 20, 1958 agreement. CSA 10A ~~hope~~ proposes to arrange for an exchange of Nacimiento Project water for Whale Rock Water to avoid costly construction of an extension to the existing Chorro Valley pipeline.

The Lewis C. Pollard Family Trust owns five parcels in Cayucos including an 84-unit trailer park. Shallow wells supply water under a permit issued by the County. The Pollard Trust has requested the delivery of 50 acre feet per year (AF/Y) of Nacimiento water.

Morro Rock Mutual Water Company receives water from Whale Rock Reservoir per the terms of the March 20, 1958 agreement with the Whale Rock Commission. Morro Rock Mutual Water Company has requested an allocation of 30 afy in the Nacimiento Water Project system for exchange with a Whale Rock Commission Member.

Although not listed on Table 5.4-5, water has been requested from the Nacimiento Water Project by the San Luis Community Unified School District. Their intent is to purchase Nacimiento Project water to be delivered through the State Water Project Chorro Valley Pipeline along with City of Morro Bay State Water. They anticipate negotiating an agreement with the City to wheel this water through the City of Morro Bay's system in the same manner they now receive water.

5.4.1.2 Regulatory Setting

a. San Luis Obispo County.

The San Luis Obispo County Division of Environmental Health is responsible under the provisions of Section 4.019.9 of the California Health and Safety Code for the regulation of water systems that fall under the state criteria of Public Water Systems. On January 1, 1991, the State assumed responsibility for regulation of these systems. However, budget constraints have prevented the state from taking over as the actual service provider and the State has contracted with County Health for continuation of these services. County Health regulates both individual domestic wells and wells with two to four connections.

The CZLUO includes standards which address drainage and water quality. The proposed amendment to the CZLUO detailed in Section 5.6, "Drainage" includes standards which indirectly apply to water supply. The reader is referred to Section 5.6 for more detailed information.

b. City of Morro Bay.

Policy 3.3 of Morro Bay's Water and Wastewater Management Element states that Morro Bay will not compete with local agricultural use of groundwater or damage wildlife habitat through reduced stream flows in obtaining long-term sources of supply.

c. Coastal Act (1976)

The Coastal Act contains the following sections pertaining to water supply (added in response to comments received by the Coastal Commission, see appendices).

> 30231. Biological productivity; water quality. The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of wastewater discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface water flow, encouraging wastewater reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.

(Issues associated with drainage and water quality are addressed in Section 5.6. Issues associated with groundwater supplies are addressed herein. Issues associated with biological resources are addressed in Section 5.8.)

> 30241(e). Prime agricultural land; maintenance in agricultural production. The maximum amount of prime agricultural land shall be maintained in agricultural production to assure the protection of the areas agricultural economy, and conflicts shall be minimized between agricultural and urban land uses...(e) by assuring that public service and facility expansions and nonagricultural development do not impair agricultural viability, either through increased assessment costs or degraded air and water quality.

(Issues associated with agricultural land are addressed in Section 5.9. Issues associated with air quality are addressed in Section 5.2; impacts associated with water quality are addressed in Section 5.6.)

> 30250(a). Location; existing developed area. New residential, commercial, or industrial development, except as otherwise provided in this division, shall be located within, contiguous with, or in close proximity to, existing developed areas able to accommodate it or, where such areas are not able to accommodate it, in other areas with adequate public services and where it will not have significant adverse effects, either individually or cumulatively, on coastal resources. In addition, land divisions, other than leases for agricultural uses, outside existing developed areas shall be permitted only where 50 percent of the usable parcels in the area have been developed and the created parcels would be no smaller than the average size of surrounding parcels.
>
> 30254. Public works facilities. New or expanded public works facilities shall be designed and limited to accommodate needs generated by development of uses permitted consistent with the provisions of this division; provided, however, that it is the intent of the Legislature that State Highway Route 1 in rural areas remain a scenic two-lane road. Special districts shall not be formed or expanded except where assessment for, and provision of, the service would not induce new development inconsistent with this division. Where existing or planned public works facilities can accommodate only a limited amount of new development, services to coastal dependent land use, essential public services and basic industries vital to the economic health of the region, state, or nation, public recreation, commercial recreation, and visitor-serving land uses shall not be precluded by other development.
>
> 30255. Priority of coastal-dependent developments. Coastal-dependent developments shall have priority over other developments on or near the shoreline. Except as provided elsewhere in this division, coastal-dependent developments shall not be sited in a wetland. When appropriate, coastal-related developments should be accommodated within reasonable proximity to the coastal-dependent uses they support.

5.4.2 Methodology and Significance Thresholds

Methodology for estimation of water demand associated with the proposed Area Plan was based upon land use water demand factors discussed in Section 5.4.1.1 "Current Water Consumption". According to State CEQA guidelines, a project will have a significant impact on the environment if it will:

- Substantially degrade water quality;
- Substantially degrade or deplete groundwater resources; or
- Interfere substantially with groundwater recharge

In addition, the county[20] has typically found impacts significant if project implementation results in a water demand that exceeds available supplies.

5.4.3 Proposed Project Impacts and Mitigation Measures

5.4.3.1 Area-wide

The Estero Area is relatively large and encompasses many waterways experiencing differing water supply situations and stresses, impacts associated with water resources are not appropriate for assessment at the area-wide level. While general statements of impacts are provided below, the reader should refer to Section 5.4.3.2 "Community-specific Impacts" for a more thorough analysis.

Impact WR-1: Implementation of the Estero Area Plan would increase water demands in the planning area because of increases in residential, commercial and industrial land uses. According to available information, water resources ~~are~~ may not be sufficient in the communities of Los Osos or Cayucos to meet future demand, and full development under the plan would create a significant impact to water resources in those areas.

Special Policies, Programs & Standards.

Many of these provide mitigation to impacts that could result from development under the Estero Area Plan. **NOTE: subsequent modification or elimination of the policies cited in this section may modify the conclusions of this EIR.**

Policy 1 - Local Coastal Plan, Groundwater Basin Integrity: The long-term integrity of groundwater basins within the coastal zone shall be protected. The safe yield of the groundwater basin, including return and retained water, shall not be exceeded except as part of a conjunctive or resource management program which assures that the biological productivity of aquatic habitats are not significantly adversely impacted.[26]

Policy III.A.1. Monitor water demand through the Resource Management System to ensure that new development can be supported by available water supplies without depleting groundwater supplies or degrading water quality.

Program - Resource Management System: This program annually reviews resources in the planning area and establishes thresholds of severity for any problems that arise. Recommendations are then made to the Board for review and certification. The Board may adopt ordinances for community-specific problems.[27]

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26 *SLO County Local Coastal Plan,* Coastal Watershed Policies, Policy #1

27 *Annual Resource Summary Report* (2002). County of San Luis Obispo.

Policy 4.I.B.1 Development Within Resource Capacities: Adequate public or private resource capacities shall be available to serve proposed development. Within urban areas, adequate water supply and sewage disposal capacities shall be available to serve both existing and potential development within the community before approval of new land divisions using those services.

Program 3.III.B.1 Wastewater Recycling: Sewage disposal agencies should work with the County Public Works and Health Departments and the Regional Water Quality Control Board to develop a program to find alternative uses for treated wastewater, such as irrigation (e.g. on agricultural lands and the Morro Bay Golf Course), groundwater recharge, and environmental enhancement.

Discussion

Implementation of the proposed Estero Area Plan would result in an increase in water demand due to increased development and slight increases in agricultural usage. Constrained water supplies may also impact coastal-related uses. The Area Plan includes a number of policies and programs, which, consistent with the Coastal Act, aim to reduce impacts to water supply, including concentrating development within existing developed areas, and requiring evidence of adequate water supply prior to permit approval. Projected water demands by subarea are shown in Tables 5.4-7 through 12. The significance of this impact is assessed on a community-specific level below.

Impact WR-2: Implementation of the proposed Estero Area Plan could result in potential decreases in groundwater recharge capabilities.

Special Policies, Programs & Standards

Groundwater recharge is addressed in policies cited in Section 5.6, "Drainage".

Additionally: In suitable recharge areas, site design and layout shall retain runoff on-site to the extent feasible to maximize groundwater recharge and to maintain in stream flows and riparian habitats[26] In general, increases in development may potentially have an effect on groundwater recharge and available supply. Increases in impermeable surfaces (e.g., roofs, streets) because of development may affect the overall groundwater supply by not allowing precipitation to infiltrate. Further discussion and mitigation regarding drainage may be found in Section 5.6, "Drainage and Water Quality". Because of the project-specific nature of this impact, no significance can be assessed at this level.

5.4.3.2 Community-Specific Impacts

This section of the analysis describes water consumption associated with buildout of each portion of the planning area. As discussed previously, this analysis presents a reasonable "worst case" scenario and assumes that no further water conservation measures are implemented either in domestic, industrial, commercial or agricultural use. Moreover, it assumes that savings due to conversion of agricultural lands are nonexistent. Tables 5.4-7 through 5.4-12 show the distributions of increased water consumption associated with future development in the planning area. Note that most of the additional water consumed would be accounted for by increased urban residential development in the Los Osos area.

a. *Rural Estero.*

Because the Rural Estero spans three distinct groundwater supply basins with unique issues, the following discussion is broken down for clarity. Because of the unique issues facing the Los Osos groundwater basin, the discussion regarding the section of the Rural Estero which receives supplies from the Los Osos basin is discussed under "d. Los Osos Area", below.

Table 5.4-6. Water Consumption for Rural Estero

Location / Use	Current Supply (Safe Annual Yield - AF/Y)	Current Demand (AF/Y)**	Projected Demand (AF/Y)	(Shortfall) Surplus AF/Y
Morro & Chorro Creek Basins: Agriculture	3,200*	2,412	2,600	
Morro & Chorro Creek Basins: Private Wells	[a]	52	60	
Total	**3,200***	**2,464**	**2,660**	**540** [b]

[a] Supply is some portion of the combined flows from the Chorro and Morro Creek Basins
[b] Refer to discussion below.
* Supply is equal to the total safe annual yields of Morro and Chorro Creek Basin minus the 255 AF/Y withdrawal assumed for the Other Watershed area.
** From 2000 DEIR; considered valid due to slow growth in Rural Estero

Impact WR-3: Potential less than significant impacts to water supplies in the Chorro and Morro Creek Basins from Buildout.

Special Policies, Programs and Standards

Policy 4.II.5: Protect groundwater supplies for agriculture. Reject proposed general plan amendments to increase density or expand urban areas if resulting development would adversely affect ground water supplies, quality or recharge capability needed for agricultural users.

Program 3.III.A.8 Water Management: The county and city of Morro Bay should jointly develop a groundwater management program that results in cooperative planning among affected agencies. The program should encourage better recharge through percolation basins and consider drilling of new wells and changing the frequency of well pumping.

Policy 4.III.2: Establish a "project referral area" that includes the Morro and Chorro Creek hydrologic basins within the sphere of influence of the city of Morro Bay. Refer to the city for its review and comment on proposed development subject to discretionary review.

Standard 7.III.G.2 Morro and Chorro Groundwater Basins: Applications for land divisions, general plan amendments, Minor Use Permits, and Development Plans within the Morro and Chorro groundwater basins shown in Figure 7-5 shall not adversely impact aquatic habitats. Environmental review shall evaluate potential impacts of development on groundwater resources.

As discussed in Section 3.0, "Project Description", implementation of the Estero Area Plan would result in an increase in residential development in this area.

Historically, the Morro and Chorro Creek Basins were used by the City of Morro Bay and the public facilities in the Other Watershed secondary study area to supply water. The recent completion of the State Water Project has relieved the dependence of these entities on these basins to a great degree. However, it is important to note that the City of Morro Bay still maintains its rights to Morro and Chorro Creek, which total 1,758 AF/Y. Currently, State Water supply rates are sufficient to handle City demand without the need for supplemental well water. However, it is reasonably foreseeable that as the State Water system is built out and as the City of Morro Bay continues to grow, the rate (gpm) of water flow may not be sufficient for peak (summer) demand[28]. Other

[28] Bill Boucher, Morro Bay Public Works. Personal Communication.

complications could occur in the case of State Water Project system problems. The City of Morro Bay is already near the limits of their allotment from the State Water project. Potential use of water from the Morro and Chorro Creek basins would more than negate the surplus calculated above. Estero Area Plan policies to protect agricultural water sources do not apply to the City of Morro Bay, which lies outside the jurisdiction of the proposed Estero Area Plan. The potential water deficit associated with buildout under the Estero Area Plan therefore constitutes a significant impact. Implementation of the aforementioned program in the plan would most likely reduce this impact to less than significant. However, programs are instituted only if funds are available, and are not guaranteed to happen. The impact therefore remains significant.

b. *Cayucos Area.*

Table 5.4-7: Water Consumption for Cayucos (From pg. 3-13, Estero Area Plan Update)

Location / Use	Supply (AF/Y)		Demand (AF/Y)		(Shortfall) Surplus - AF/Y	
	Current	Projected (+ Nacimiento)	Current	Projected	Current	Projected
Cayucos: Community + Cemetery	600	760	400	513-749[1]	200	11-247

[1]Varies, based on different scenarios; see Table 3-3 in Area Plan.

Impact WR-4: Under the most realistic estimate of future water demand presented in Table 3-3 of the Draft Area Plan, buildout ~~will outstrip~~ may exceed currently available supplies. Nacimiento Project water would reduce impacts to less than significant levels, however, future availability of such water is considered speculative.

Special Policies, Programs and Standards

Policy 3.II.A.2: Securing supplemental water to accommodate future development in Cayucos shall be a priority. Some of the buildout projections in the Area Plan would see Cayucos surpassing its projected water supply. Efforts to procure additional water sources will be necessary under this scenario.

Programs: Cayucos water purveyors should set goal of reducing residential water demand by at least 20 percent by establishing programs such as public education, leak detection, landscape conversion, and various retrofit programs.

Water Conservation - The Cayucos water purveyors should set a goal of reducing total residential water demand by at least 20% and should cooperatively implement conservation programs involving measures such as public education, leak detection, landscape conversion, and various retrofit programs. For example, the water purveyors should jointly develop a voluntary program for retrofitting existing dwellings and businesses in order to earn additional water units and enable additional development within applicable growth management limitations.

Consolidation of Water Purveyors - The county, water purveyors, community, and LAFCo should study the possibility of consolidating all the water purveyors in a way that would be cost-beneficial to the community as a whole.

Graywater Recycling - The county should work with the public to encourage development and use of large-scale graywater recycling projects for irrigation in new development.

Standards 7.V.A.1-3

1. Land Divisions: Finding. New land divisions, other than condominium conversions, shall not be

approved unless the review authority makes a finding that there are sufficient water and sewer capacities to serve development resulting from the proposed land division, existing development (at current rates of water use and occupancy), and all vacant parcels at buildout under this plan.

2. Land Divisions and Land Use Permits: Application Content. All applications for new land divisions and land use permits for new development shall be accompanied by letters from the applicable water purveyor and the Cayucos Sanitary District stating their intent to serve the proposed project.

3. Building Permits: Clearance for Services. All applications for building permit approval are to be accompanied by a letter or other verification from the Cayucos Fire Protection District, the applicable water purveyor, and the Cayucos Sanitary District indicating that the proposed project has received fire clearance and water service and sewer connection approvals.

Varying buildout scenarios were created for the Cayucos area based on different occupancy rates. For more detail on the alternatives relating to these impacts see the Estero Area Plan, Chapter 3: "Public Facilities, Services and Resources". The scenarios differ depending upon assumptions about the number of residences that would be occupied year round. Many residences in Cayucos are seasonal, and therefore use less than the average household. In general, the trend may entail more houses being occupied year round. Assuming 70 % occupancy for existing development and 95% for new development, the community's water demand at buildout could be a little over 600 AF/Y–the community's allocation–without retrofitting. However, based on historic conditions, another scenario provides a more realistic estimate of water demand. In that scenario, an approximate 87% occupancy rate for existing development and a 91% occupancy rate for new development could result in a buildout demand that is substantially higher than 600 AF/Y without retrofitting. If Cayucos' existing residences and businesses were to have their plumbing fixtures replaced with ultra low-flow fixtures–many residences have already been retrofitted–demand estimates would be reduced. Implementation of the aforementioned Estero Area Plan policy could create an additional 160 AF/Y water supply from the Lake Nacimiento Project, effectively extending the occupancy rates (population) allowable. Implementation of a conservation program within CSA 10 could further reduce demand by 38 AF/Y, reducing the deficit further. However, availability of water from the Lake Nacimiento Project is considered too speculative to include in the assumption of this EIR; impacts are therefore potentially significant.[29]

c. ***Cayucos Fringe Area.***

Table 5.4-8: Water Consumption for Cayucos Fringe

Location / Use	Supply (Safe Annual Yield - AF/Y)		Demand		(Shortfall) Surplus - AF/Y	
	Current	Projected	Current	Projected	Current	Projected
Villa Creek Basin: Ag/rural	1,000	1,000	450	475	550	525
Cayucos Creek Basin: Ag/rural	600	600	250	265	350	335
Toro Creek Basin: Ag/rural	591	591	50	60	541	531
Total	**2,191**	**2,191**	**750**	**800**	**1,441**	**1,391**

29 The reader should note that obtaining water from the Nacimiento project would not require the extension of infrastructure into the area; additional water supplies would be obtained through transfer of Whale Rock entitlements from the City of San Luis Obispo.

The Cayucos Fringe is supplied by the Villa, Cayucos, and Toro Creek Basins, which combined have a safe annual yield of 2,191 AF/Y. Implementation of the Estero Area Plan in this region would result in a total demand of 800 AF/Y, well below available supply. Impacts to water supply in this area would be less than significant.

d. ***Los Osos Area.***

Table 5.4-9: Water Consumption for Los Osos

Location / Use	Supply (Safe Annual Yield - AF/Y)		Demand (AF/Y)		Projected (Shortfall) Surplus AF/Y
	Current	Projected	Current	Projected	
Los Osos: Community	[a]	[b]	UK	3,000	
Los Osos Basin: Agriculture	[a]	[b]	UK	800	
Los Osos Basin: Private Wells	[a]	[b]	UK	200	
Total	**3,560**	**3,940**	**3,380**	**4,000[c]**	**(60)**

[a] Supply is equal to some portion of 3,560 AF/Y (estimated safe annual yield of Los Osos Basin).
[b] Supply is equal to some portion of 3,940 AF/Y (projected estimated safe annual yield of Los Osos Basin).
[c] Project demand is based on the Los Osos CSD's Water Master Plan, which uses a slightly higher buildout population than the Draft Area Plan. Projected demand under the proposed Area Plan is expected to be slightly less; however, it is not clear to what degree it will be reduced. The figure given in the table is considered a conservative estimate.

Impact WR-5: Implementation of the Estero Area Plan policies will result in potentially significant impacts to water supplies in the Los Osos basin.

Special Policies, Programs and Standards

Standard 7.VI.B.5 General Plan Amendments: General plan amendments shall be evaluated with regard to their effects on water supply and demand and only amendments that maintain or decrease net water use may be approved.

Standard 7.VI.K.1.4.2 Sewer and Water Capacity. The proposed transfer of development potential shall not adversely affect the capacity of the community sewer system and shall not exceed the safe yield of the groundwater basin.

Also: Policies, programs, and standards concerning resource capacities, adequacy of services and priority of uses: RMS system, and existing Coastal Plan (Public Works) policies 1, 8, and 6 and implementing CZLUO provisions.

Program 3.III.A.2 Reevaluation of Buildout: If construction permits are issued for a community sewer project and a groundwater study of the Los Osos groundwater basin is adopted by the Los Osos Community Services District, the Planning and Building Department should do the following:

1. Compare the amount of buildout under this plan to sewer capacity and "safe yield" of the groundwater basin; and

2. Initiate general plan amendments as needed that propose changes to buildout and the location of the Urban Services Line so that the amount of future development can be

accommodated by the capacity of the sewer system and the safe yield of the groundwater basin without seawater intrusion.

Buildout Reductions--No Sewer. In the event that a community sewer system is not operational by Spring 2008, the county should initiate general plan amendments as needed to reduce buildout within the Urban Reserve Line to a level that can be accommodated by use of septic systems throughout the community. (The reader should note that this amount would effectively be zero within the prohibition zone, which excludes some areas within the URL, including Cabrillo Estates, properties east of South Bay Boulevard, and other hillside properties. A cease and desist order issued in 1988 prohibits use of septic systems for wastewater disposal within the prohibition zone after 2006.)

Standard 7.VI.B.1 Water Capacity, Land Divisions: New land divisions within the Los Osos groundwater basin (see Figure 3-3 in Chapter 3 of the Area Plan) shall not be approved unless the review authority makes a finding that the following development can be accommodated by the sustainable yield of the Los Osos groundwater basin without seawater intrusion: development resulting from the proposed land division, existing development (at current rates of water use and occupancy), and development of all vacant parcels within the Los Osos urban services line at buildout under this plan. This finding shall be based on the best available scientific information.

Program 3.III.A.1 Water Management--Los Osos Groundwater Basin - The water purveyors within the Los Osos groundwater basin should do all of the following:

A. Pursue water conservation measures and water recycling programs to assure that the existing groundwater supply can serve the expected buildout population

B. Estimate water demand from agricultural irrigation and private wells, as well as urban demand, to confirm water use estimates

Policy 4.V.A.7 Urban Service Line Expansion: Consider expanding the urban services line only when water service can be provided by a community water purveyor, and only when either or both of the following occur:

1 A groundwater study demonstrates that buildout within the urban reserve line, together with historic agricultural uses, can be supported by the sustainable yield of the groundwater basin, without seawater intrusion

2 A program to make additional water available to Los Osos has been approved and funded

Standard 7.VI.A. On-Site Wastewater Disposal. New development using on-site wastewater disposal systems shall protect coastal water quality and meet the requirements of the Regional Water Quality Control Board.

Discussion

Development associated with the Estero Area Plan would exceed available supply by 60 AF/Y, assuming the moratorium is lifted and the sewer is constructed. Recycling programs identified in the Area Plan would be sufficient to reduce demand to within available supplies, especially considering the reduced buildout (and demand) of the Area Plan when compared with the Water Master Plan, however, the implementation of such programs is at the discretion of the Los Osos CSD and is not the jurisdiction of the County. Such programs cannot be relied on as mitigation in this EIR, therefore, and impacts remain significant.

Impact WR-6: Implementation of the Estero Area Plan could decrease groundwater infiltration and recharge of ~~in~~ the Los Osos Basin. This ~~is~~ impact is considered adverse but less than significant ~~because of standards incorporated into the proposed Area Plan~~.

Special Policies, Programs and Standards

Refer to Section 5.6, Drainage for applicable policies and standards.

The USGS reports that fully 80 percent of the recharge of the Los Osos Valley groundwater basin comes from rainfall infiltration. Increases in impermeable surfaces associated with residential and commercial buildout would decrease the amount of exposed ground, and would inhibit direct infiltration of rainfall. However, installation of proper drainage basins and the use of recharge basins may mitigate this impact. This impact can only be assessed adequately on a more project-specific level, and for the purposes of this report is a potential impact only. Mitigation will be determined on a site-specific basis.

e. ***Other Watershed Area.***

Table 5.4-10: Water Consumption for Other Watershed Area

Location / Use	Supply (AF/Y)		Demand (AF/Y)		(Shortfall) Surplus - AF/Y	
	Current	Projected	Current	Projected	Current	Projected
Other Watershed - Public Facilities	2,049 + a	2,049 + a	1,240	1,347[c]		
Other Watershed - Residential	b	b	40	97		
Other Watershed - Camping Units*	b	b	5.5	6.05		
Total	**2,049 +a,b**	**2,049 + a,b**	**1,285.5**	**1,450.05**	**>763.5**	**>598.95**

a Supply includes some portion of the Chorro Creek Basin
b Supply is some portion of the Chorro Creek Basin
c *San Luis Obispo Area Plan EIR*, 1995.
* Water use demand calculations for camping were considered to be the lowest available for motel use (.11 AF/Y. North Coast Area Plan EIR, 1997). Other values for motels were on the order of .13 -.43 AF/Y and greater (Mike Wulkan, County of San Luis Obispo Planning Department, pers. comm.).

Implementation of the applicable area plans in this region would result in an increase in consumption of approximately 165 AF/Y, most of which is due to increased development associated with public facilities. Development associated with implementation of the Estero Area Plan would have a less than significant effect on water supplies in this area.

f. Other

Impact WR-6: Consistency with Sections 30231, 30241(e), 30250(a), 30254, and 30255 of the Coastal Act.

NOTE: This information has been added in response to Coastal Commission comments received.

30231. The plan includes programs to minimize the effects of wastewater discharge (mentioned earlier in this section). Issues associated with drainage and riparian areas are addressed elsewhere in this EIR. The plan prevents depletion of ground water supplies primarily by requiring development to analyze effects on ground water supplies (including agricultural supplies) prior to permit approval, and includes other policies and programs aimed at sustainable water use.

30241(e). The Area Plan does not propose increased assessment costs for agricultural operations. The Plan furthermore includes a policy placing priority on agricultural use for ground water supplies (mentioned earlier in this section).

30250(a). Impacts to coastal resources are addressed throughout this EIR. In general, the Area Plan is consistent with this section, in that it concentrates development in existing developed areas, and requires evidence of adequate services prior to permit approval. Development is generally allowed at the minimum density necessary

to avoid invocation of takings law.

30254. Highway 1 is addressed in Section 5.1, but is purposefully not proposed to be widened in accordance with this section. In terms of water-related public works facilities, the plan does not identify extensions except in Los Osos in areas considered as part of the supply analysis, and even then conditions development on a number of levels. The plan does not call for formation or expansion of special districts. The County's Coastal Plan policies document contains a public works policy (8, pg. 8-8) which places priority on coastal-dependent developments consistent with the Coastal Act.

30255. The County's Coastal Plan policies document contains a public works policy (8, pg. 8-8) which places priority on coastal-dependent developments consistent with the Coastal Act.

The Area Plan is considered consistent with these sections of the Coastal Act.

5.4.3.3 Mitigation Measures

No additional policies or programs are recommended.

5.4.4 Cumulative Impacts

Cumulative impacts would occur if water resources within the planning area were used outside the planning area and were not accounted for. The discussion above has covered all exportation of water from the area. Another type of cumulative impact that could occur relates to the stresses on water supplies imported to the planning area, such as State Water or Nacimiento water. Drought or other over-commitment of these resources could result in impacts to the planning area. This potential diminution in supplies is a recognized component of the water resource planning that went into decisions of how much allocation to acquire from the imported sources. Water suppliers have little control over these issues and mitigation is beyond their capability.

5.4.5 Residual Impacts

Rural Estero.

Development in the Rural Estero associated with the implementation of the proposed Estero Area Plan could result in a significant, unavoidable impact on water supply in the Chorro and Morro Basins. Water supply in this area is constrained by water rights held by the City of Morro Bay, and upstream water users in the Other Watershed Study Area. Potential use by these entities could exceed the safe annual yields of these basins. Because the City of Morro Bay lies outside the jurisdiction of this Area Plan, no regulation of that entity under this Area Plan is feasible. Policies contained in the proposed Estero Area Plan would effectively preclude any development in the area until further supplies were assured. However, because projected development may exceed safe annual yields, the impact of full development under the Area Plan remains significant.

Cayucos.

Buildout in the Cayucos Area would exceed ~~available~~ *current* supplies ~~even with the inclusion of Nacimiento Project water and with policies legislating reduction of water use by CSA 10~~. Policies legislating the reduction of water use by CSA 10 and the Nacimiento Project water would provide sufficient water to meet future demand, however, future availability of such water is considered speculative. Policies contained in the Area Plan, which restrict development until adequate water supplies are available would effectively limit development, and maintain reasonable demand. It should also be noted that the Cayucos community has performed well in water conservation efforts in the past, and that a county-sponsored conservation program would most likely reduce impacts even further. However, because demand under some buildout scenarios would exceed supply, impacts remain significant.

Los Osos.

Buildout in the Los Osos Area would exceed available supplies. Policies contained in the Area Plan, which restrict development until adequate water supplies are available would effectively limit development, and maintain ~~reasonable~~ balanced demand. It should also be noted that the LOCSD has identified water conservation measures in its Water Master Plan which would most likely reduce impacts. However, the County does not have discretion over the implementation of such conservation measures; therefore, ~~because demand under the proposed Area Plan would exceed supply,~~ impacts are considered significant and unavoidable.

5.5 Wastewater

The following section analyzes impacts to wastewater treatment plants and septic tank systems associated with implementation of the proposed Estero Area Plan.

5.5.1 Setting

5.5.1.1 Existing Conditions

Wastewater collection for the planning area is provided through wastewater service districts and individual septic tank systems.

a. Wastewater Service Districts

The community of Cayucos and the City of Morro Bay are located within the Morro Bay wastewater service district. A joint powers agreement between the Cayucos Sanitary District and the City of Morro Bay provides for disposal and treatment at the Morro Bay plant. Morro Bay's treatment plant was originally designed in 1964 to accommodate 1.7 million gallons per day (mgpd). In 1984, the plant was expanded to provide a total dry weather flow capacity of 2.36 mgpd.[1] The joint powers agreement allots 40 percent of plant capacity to the Cayucos Sanitary District (approximately 0.944 mgpd). Cayucos is currently operating at 27 percent of its total entitlement or approximately 0.252 mgpd.[2] The City of Morro Bay is entitled to the remaining 60 percent of capacity and currently utilizes approximately 97 percent of its total allotment or approximately 1.370 mgpd.[1]

Secondary Study Areas. The California Men's Colony (CMC), Camp San Luis Obispo, the County Operational Center and Cuesta College are all served by a 1.2 mgpd treatment plant operated by the state at CMC. Average flow to this plant has been reported as approximately 0.62 mgpd, or 52 percent of capacity.[3]

b. Septic Tank Systems

Septic tank sewage disposal is utilized in portions of the Estero planning area not covered by wastewater service districts, including Los Osos and the Rural Estero. Because the exact number of septic tanks in use in the planning area is not known at this time, based on dwelling unit numbers discussed in Section 3.0, "Project Description" it is estimated that approximately 6,617 septic tank systems are in use.[4]

Secondary Study Areas. Rural dwellings in portions of the Cayucos Fringe and Other Watershed secondary study areas also utilize septic systems for wastewater disposal. Although exact numbers are not known at this time, it is assumed that approximately 298 septic tank systems are in use in these areas.[5]

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1 Personal Communication, Les Girvin, Morro Bay Wastewater Treatment Plant Supervisor. July 22, 2003

2 Estero Area Plan Update. Facilities, Services, Resources. Public Hearing Draft. July 2003.

3 *San Luis Obispo Area Plan EIR*, 1995.

4 Based on dwelling unit numbers discussed in Section 3.0, "Project Description". One septic system is assumed for each residence outside of wastewater service districts.

5 Based on dwelling unit numbers discussed in Section 3.0, "Project Description". One septic system is assumed for each residence outside of wastewater service districts.

"Septage" refers to accumulated matter in septic systems that must be routinely pumped out of the system.[6] Historically, septage from tank pumping has been disposed of at a number of privately-owned sites within San Luis Obispo County largely through land application methods because of the associated low cost of disposal. It is important to note that a regularly maintained residential septic tank should only be pumped for septage about once every five years.[7] Regulatory requirements have resulted in the gradual closure of privately operated disposal sites within San Luis Obispo County. Sludge disposal for private pumpers is currently provided by the City of Santa Maria wastewater treatment plant which accepts sludge from private pumpers on a fee basis. This wastewater facility consists of percolation basins for effluent disposal and has an existing treatment capacity of 9.9 mgpd. Santa Maria recently expanded their treatment capacity and will not reassess their treatment capacity until 2008. Santa Maria is at capacity for it septage receiving capabilities and could not accommodate any large future demands for septage treatment.[8]

Community of Los Osos. Perhaps the most complex issue in the Estero area is wastewater management in Los Osos. The community has been ordered to build a community wastewater facility by the Regional Water Quality Control Board (RWQCB). No development has been allowed (with limited exception) within a "prohibition area" since 1988. In November of 1998, voters approved the formation of a Community Services District (CSD) for Los Osos to assume responsibility for the completion of a wastewater project. The CSD has proposed a conventional collection, treatment and disposal system for the community and has chosen to implement a Septic System Maintenance and Management Program (SSMMP) for those areas where wastewater will not be collected. Septage will then be treated by the newly constructed wastewater project in Los Osos. Construction is planned for the Fall of 2004. For more detail, refer to discussion under Section 5.5.3.2d, "Los Osos Area", below.

5.5.1.2 Regulatory Setting

a. Wastewater Treatment and Collection Facilities

Sewage collection treatment and disposal facilities are regulated by a number of agencies at the federal, state and regional levels. The RWQCB issues National Pollutant Discharge Elimination System (NPDES) permits which regulate stormwater and wastewater discharge under authority of the State. RWQCB also requires periodic effluent testing and reporting from these facilities to ensure their efficacy. The California State Water Resources Control Board (SWRCB) provides financial assistance for the construction of new facilities. Permits for streambed alterations in conjunction with effluent disposal are issued by the California Department of Fish and Game. The San Luis Obispo Air Pollution Control District issues air pollution permits to construct and operate anaerobic wastewater treatment plant facilities(approximately half of all the plants constructed), including Morro Bay.

b. Septic Tanks

Use of septic tank systems is regulated by the San Luis Obispo County Building Department, County Environmental Health Division and the RWQCB. The Building Department is the administrative authority over septic tank operation within the County and conducts permitting and inspection of septic tank systems. County Environmental Health conducts feasibility review of new systems and requires septic tank pumpers to submit an annual report of septic tanks within the County. The RWQCB regulates effects of septic systems on water quality by enforcing the Porter-Cologne Water Quality Control Act. Septic systems in Los Osos that will remain after the construction of the wastewater treatment plant will also be incorporated into the SSMMP.

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6 *North Coast Area Plan EIR*, 1996. pg. 5.3-9

7 Final *Environmental Impact Report for Los Osos Wastewater Facilities Project*, Los Osos CSD. 2001.

8 Personal Communication, Tom LaMoreaux, Santa Maria Wastewater Treatment Plant Supervisor. July 24, 2003.

The Coastal Act contains the following sections pertaining to wastewater.

> 30231. Biological productivity; water quality. The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of wastewater discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface water flow, encouraging wastewater reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.

(Issues associated with drainage and water quality (including wastewater discharge) are addressed in Section 5.6. Issues associated with groundwater supplies are addressed in Section 5.4. Issues associated with biological resources are addressed in Section 5.8.)

> 30250(a). Location; existing developed area. New residential, commercial, or industrial development, except as otherwise provided in this division, shall be located within, contiguous with, or in close proximity to, existing developed areas able to accommodate it or, where such areas are not able to accommodate it, in other areas with adequate public services and where it will not have significant adverse effects, either individually or cumulatively, on coastal resources. In addition, land divisions, other than leases for agricultural uses, outside existing developed areas shall be permitted only where 50 percent of the usable parcels in the area have been developed and the created parcels would be no smaller than the average size of surrounding parcels.

> 30254. Public works facilities. New or expanded public works facilities shall be designed and limited to accommodate needs generated by development of uses permitted consistent with the provisions of this division; provided, however, that it is the intent of the Legislature that State Highway Route 1 in rural areas of the remain a scenic two-lane road. Special districts shall not be formed or expanded except where assessment for, and provision of, the service would not induce new development inconsistent with this division. Where existing or planned public works facilities can accommodate only a limited amount of new development, services to coastal dependent land use, essential public services and basic industries vital to the economic health of the region, state, or nation, public recreation, commercial recreation, and visitor-serving land uses shall not be precluded by other development.

> 30255. Priority of coastal-dependent developments. Coastal-dependent developments shall have priority over other developments on or near the shoreline. Except as provided elsewhere in this division, coastal-dependent developments shall not be sited in a wetland. When appropriate, coastal-related developments should be accommodated within reasonable proximity to the coastal-dependent uses they support.

5.5.2 Methodology and Significance Thresholds

The County of San Luis Obispo wastewater production rates were applied to existing figures and buildout projections for the different land use categories discussed in Section 3.0, "Project Description" to quantify and project wastewater generation in the Estero Area. Morro Bay projections were based on population estimates used in the *Master Water Plan Update* and in the *Morro Bay General Plan.* A wastewater generation rate of 106 gallons per capita (gpc) was applied to these numbers to project wastewater output associated with buildout in Morro Bay.[9]

CEQA guidelines state that a impact will be significant if: the project would:

- Exceed wastewater treatment requirements of the Central Coast Regional Water Quality Control Board.
- Require or result in the construction of new wastewater treatment facilities or expansion of existing

9 *San Luis Obispo Area Plan EIR*, 1995.

facilities, the construction of which could have significant environmental effects.

- Result in a determination by the wastewater treatment provider which serves the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.

5.5.3 Proposed Project Impact Analysis and Mitigation Measures

5.5.3.1 Area-wide Impacts

Special Policies, Programs, and Standards for the Proposed Area Plan

Policy I.B.1: **Development within Resource Capacities.** Adequate public or private resource capacities shall be available to serve proposed development. Within urban areas, adequate water supply and sewage disposal capacities shall be available to serve both existing and potential development within the community before approval of new land divisions using those services.

Policy III.B: **Sewage Disposal.** Monitor sewage flows through the Resource Management System to assure that new development can be accommodated by sewage disposal capacities

Program III.B.1: **Wastewater Recycling.** Sewage disposal agencies should work with the County Public Works and Health Departments and the Regional Water Quality Control Board to develop a program to find alternative uses for treated wastewater, such as irrigation (e.g. on agricultural lands and the Morro Bay Golf Course), groundwater recharge, and environmental enhancement.

Impact WW-1.: **~~Implementation~~ Buildout of the proposed Estero Area Plan would increase the wastewater generation within the Estero planning area.**

Because of the varying methods of wastewater disposal service within the Estero planning area, this impact will be assessed and discussed by community in the following "Community-Specific"sections. As previously discussed, wastewater service to the majority of the planning area is provided through individual septic tank systems. Development within areas not served by wastewater treatment plants would be required to provide adequate septic tank systems on a project-by-project basis. Development in the Los Osos area is constrained by the moratorium on sewage discharge, and new septic systems are generally not allowed within the restriction zone. Proposed systems outside of Los Osos would be subject to feasibility review and permitting by County Building and Planning and County Environmental Health. The installation of additional septic systems within the planning area would also increase septage generation. Disposal of septage within the planning area would be to the City of Santa Maria wastewater treatment plant. Los Osos plans to treat their own septage from the SSMMP when their wastewater treatment plant is constructed. Septage generation associated with buildout of the planning area is shown in Tables 5.5-1 through 5.5-6 (where applicable). Tables 5.5-1 through 5.5-6 also show the projected wastewater flow for each sub-area upon buildout of the proposed Area Plan.

5.5.3.2 Community-Specific Impacts

a. Rural Estero.

Special Policies, Programs, and Standards for the Proposed Area Plan

Program III.A.7: Agricultural Water Supplies. Maintain the quantity and quality of ground water resources currently consumed by production agriculture. Where sources of adequate wastewater quality are available, develop a program with appropriate agencies to use treated wastewater for irrigation.

Table 5.5-1: Rural Estero Wastewater Calculations

Land Use	Existing Units[1]	Rate (gpd)[2]	Existing flow (mgpd)	Number of units at Buildout	Projected flow (mgpd)	Potential flow increase (mgpd)	Potential Septage Increase (gpd)[3]
Residential	364	200/du	0.073	688	0.138	0.065	650
Commercial	85 camping units	30 (50% occup)[4]	0.0025	165	0.0049	0.0024	24
Total			0.0755		0.1429	0.0674	674

[1] All numbers are from Section3.0, "Project Description" unless otherwise noted.

[2] Residential rates are from the County Department of Planning and Building, and all others are from the *San Luis Obispo Area Plan EIR*, unless otherwise noted.

[3] Septage generation is based on an assumption of 1% of total flow as residue as per the *San Luis Obispo Area Plan EIR*, 1995. Septage generation is not considered for communities in wastewater service districts.

[4] Rates for hotel generation are from the *North Coast Area Plan EIR*, 1996. These figures are considered to be very low comparative to actual hotel use, and are used here to reflect camping generation. There are many uncertainties surrounding this assumption, among which is the use of motor homes by visitors, which dump wastewater only intermittently. This is a best educated guess at actual waste generation.

Impact WW-2: Increases in wastewater flows in portions of the Rural Estero area will have less than significant impacts on treatment facilities.

Buildout as proposed in the Estero Area Plan rural areas would result in an increase in wastewater flow, and subsequently, an increase in septage generation. The relatively small contribution that these increases would make to the plant at Santa Maria would not result in levels exceeding wastewater flow capacities for this facility. Furthermore, the distribution of the septic systems in the rural area would be relatively wide, resulting in a very small impact to groundwater quality. New septic systems would be designed to current engineering standards based on site-specific information, and would be subject to criteria outlined in the RWQCB Basin Plan, and the County Health and Building Divisions. Assuming such systems are properly sited and maintained, impacts associated with the implementation of the Estero Area Plan in the rural area would be less than significant. The County is currently exploring septage disposal options as part of a regional effort.

b. Cayucos.

Special Policies, Programs, and Standards for the Proposed Area Plan

Program III.A.6: Graywater Recycling. The county should work with the public to encourage development and use of large-scale graywater recycling projects for irrigation in new development.

Impact WW-3: Buildout under the proposed Estero Area Plan would result in an increase in wastewater flow from the Cayucos area to the Morro Bay treatment plant.

Buildout associated with implementation of the Estero Area Plan would result in an increase in wastewater flow from the Cayucos area to the Morro Bay treatment plant. Buildout in Cayucos would result in a potential increase of 0.24 mgd, or a total of 0.49 mgd. The total flow at buildout would only represent 52 percent of Cayucos' total entitlement at the facility, and would therefore not have a substantial adverse effect on the system. It is important to note that buildout of the City of Morro Bay would generate approximately 1.4 mgd of flow. This would approach the maximum of their portion of the treatment capacity (shown in Table 5.5-2 for comparison), and that increase could affect Cayucos' available treatment in the long-term, if Morro Bay begins to exceed their allotted capacity. Further discussion of this impact can be found under "Cumulative Impacts" at the end of the section.

A difficult issue to address is the impact to wastewater from potential development in the Cayucos Hillsides, which includes two antiquated subdivisions, Morro Rock View and Morro Strand. This is addressed in an issues report prepared for the update of the area plan.[10] This report estimates development potential for the subdivisions to be 149 units if the area were developed with individual water wells and septic systems, or 1,177 units if a community water and sewer system were developed. The difference in numbers has to do with the site difficulties for development, which include slopes and soils, and the requirement for a one-acre minimum site area for development using individual wells and septic systems. Generally, an owner would need to combine several existing lots to obtain a one-acre building site. Further, much of the area is potentially too geologically hazardous for *any* development to be feasible in the future. The development of the Cayucos Hillsides is a difficult problem for the County. The County has had a policy of acquiring tax-defaulted properties in the Cayucos hillsides. The proposed Estero Area Plan includes policies to continue retaining these properties acquired through tax defaults, to defer tax actions to give the community and conservation organizations a chance to purchase properties, and to facilitate discussion between property owners, the community, and conservation organizations to resolve hillside development issues. Private conservation organizations are also working to protect these areas. The calculations for sewage in the Cayucos Hillsides is not included in Table 5.5-2 as the potential for development is too speculative.

[10] *Cayucos Issues Report #4: Cayucos Hillsides,* January 1996, prepared by the County of San Luis Obispo.

Table 5.5-2: Cayucos Wastewater Calculations

Land Use	Number of units at Buildout	Rate (gpd)[2]	Existing flow (mgpd)	Projected flow (mgpd)	Potential flow increase (mgpd)	Treatment Available (mgpd)
Residential	2,489	175/du	--	0.436	--	
Non-residential	245,100 sq. ft.	195 gpd/1,000 sq. ft.	--	0.0478	--	
Hotel/Motel	238	30 / room	--	0.00714	--	
Total (Cayucos)			0.252	0.4909	0.2389	0.944
Morro Bay - (by population)	10,959[4] (persons)	125 gpcd [3]	1.37[5]	1.42[6]	0.05	1.416
Total (Morro Bay + Cayucos Compared to Treatment Plant Capacity)			1.895	1.911	0.0289	2.36

[1] All numbers are from Section 3.0, "Project Description" unless otherwise noted.
[2] All rates are from the County Department of Planning and Building, except for Hotel/Motel, which is from the *North Coast Area Plan EIR*, 1997. Hotel/Motel assumes 50% occupancy due to the seasonal nature of the industry.
[3] gpcd = gallons per capita per day
[4] 2001 Clean Air Plan
[5] Annual Resource Summary Report. San Luis Obispo County. 2002.
[6] Morro Bay buildout estimated at 11,348. Personal Communication, Greig Cummings, City of Morro Bay. July 24, 2003

c. Cayucos Fringe.

Table 5.5-3: Cayucos Fringe Wastewater Calculations

Land Use	Existing Units[1]	Rate (gpd)[2]	Existing flow (mgpd)	Number of units at Buildout	Projected flow (mgpd)	Potential flow increase (mgpd)	Potential Septage Increase (gpd)[3]
Residential	123	200/du	0.023	426	0.081	0.058	580

[1] All numbers are from Section3.0, "Project Description" unless otherwise noted.
[2] Residential rates are from the County Department of Planning and Building and all others are from the *San Luis Obispo Area Plan EIR*, unless otherwise noted.
[3] Septage generation is based on an assumption of 1% of total flow as residue as per the *San Luis Obispo Area Plan EIR*, 1995. Septage generation is not considered for communities in wastewater service districts.

Refer to Impact: WW-2 described under "Rural Area" discussion above. The low number and low density of homes in the Cayucos Fringe will result in a relatively small overall impact to wastewater disposal.

d. Los Osos.

Special Policies, Programs and Standards

Because of Los Osos' ongoing issues with groundwater quality in the basin, existing and proposed policies place

limits or conditions on septic systems and discharge in the area. These include:

- RWQCB moratorium on discharge and new septic systems (1988). This restriction would be lifted upon the completion of the community wastewater treatment system. The prohibition area includes the densest portion of Los Osos, generally bounded by South Bay Boulevard on the west, the lower hillsides on the south, and Morro Bay on the east and north;
- Estero Area Plan proposed policy that wastewater systems shall not adversely affect groundwater quality.
- **Buildout Reductions - No Sewer.** In the event that a community sewer system is not operational by Spring 2008, the county should initiate general plan amendments as needed to reduce buildout within the Urban Reserve Line to a level that can be accommodated by use of septic systems throughout the community.

Standard VI.A: **On-Site Wastewater Disposal.** New development using on-site wastewater disposal systems shall protect coastal water quality and meet the requirements of the Regional Water Quality Control Board.

Standard VII.C: **Environmental Mitigation.** The land use/coastal development permit for development of a wastewater treatment plant and related facilities shall require implementation of the following mitigation measures as described on the listed pages in the *Final Environmental Impact Report for the Los Osos Community Services District Wastewater Facilities Project* (FEIR), SCH# 9911103, certified on March 1, 2001. Some of the following mitigation measures apply to other components of a proposed wastewater facilities project, as the entire project is expected to be processed under a single land use/coastal development permit.

Geology. Mitigation measures GEO-1 through GEO-9 on pages 112-113, Part II.

Hydrogeology. Mitigation measures H-1 through H-3 on page 114, Part II.

Drainage. Mitigation measures WR-1 through WR-3 on page 115, Part II.

Cultural Resources. Mitigation measures C-1 and C-2 on page 116, Part II.

Traffic. Mitigation measures TR-1 and TR-2 on page 117, Part II.

Air Quality. Mitigation measures AQ-1 through AQ-4 on pages 118-119, Part II.

Noise. Mitigation measures N-1, N-2, N-4, and N-5 on page 120, Part II.

Public Health, Safety and Services. Mitigation measures P-1 through PS-5 on pages 120-121, Part II.

Visual Resources. Mitigation measures AES-1 through AES-5 on page 121, Part II.

Biological Resources. Mitigation measures BIO-1 through BIO-16 on pages 121-128, Part II.

The *Water Quality Control Plan for the Central Coast Basin - Region 3* (1994) states:

"Development on small lots in Los Osos-Baywood has resulted in one of the most densely populated areas without public sewers on the central coast. Septic tank effluent is discharged in predominantly sandy soil over a ground water basin which is the sole source of water for the area. Some shallow wells have approached and exceeded the public health maximum nitrate concentration limit. The County of San Luis Obispo" conducted a Clean Water Grant funded study of this situation. Study findings resulted in a Basin Plan Prohibition of

discharges effective November 1, 1988. The County has not implemented the recommended project of sewering the area. (A new septic system discharge prohibition now exists for the area)."

Sewer Delays. The development of the Los Osos sewer has been delayed by a number of important factors, including:

- litigation;
- ~~costs~~;
- potential habitat loss for the recently listed endangered Morro shoulderband dune snail.

Impacts of Sewer Construction. While this EIR does not analyze the impacts of developing a sewer in Los Osos, carrying out the Estero Area Plan is only possible with such a facility. The impacts of wastewater disposal have been documented in a series of environmental impact reports written for the development of the sewer. These include:

- Final *Environmental Impact Report for the CSA 9 Wastewater Treatment Facilities;* and August 1987 prepared by The Morro Group [including numerous addendums and supplements]
- *Final Supplemental Environmental Impact Report for the CSA 9 Wastewater Treatment Facilities,* February 1997 prepared by Fugro West.
- Final *Environmental Impact Report for the Wastewater Facilities Project*, March 2001 prepared for the Los Osos CSD by Crawford Multari & Clark Associates.
- *Addendum to the Final Environmental Impact Report for the Wastewater Facilities Project*, May 2003.

In very general terms, the contemplated impacts of sewer construction will include:

- Loss of habitat for rare and endangered species both directly from facility construction and indirectly from the residential and commercial development that will be allowed after the lifting of the prohibition;
- Disturbance to the many archaeological sites in the community, especially during installation of the collection lines;
- Changes in water quality with the elimination of septic effluent and disposal of treated wastewater into the groundwater (this will be a beneficial impact);
- Short-term, construction related impacts; and
- Resulting increase in development in Los Osos (whose impacts are addressed in this EIR).

Draft Plan Impacts to Wastewater Disposal. The analysis of impacts to wastewater disposal in Los Osos from the Draft Estero Area Plan is somewhat anomalous. Typically, additional development would result in greater use of septic systems, adding to the amount of septage generated increasing impacts to water quality. However, because of the RWQCB order, there will be no further development in the prohibition area using septic systems. In order to develop towards buildout contemplated under the Plan, the order would need to be lifted, which will only occur after completion of a community wastewater system. A community wastewater system will both increase wastewater capacity in Los Osos and improve groundwater quality. For this reason, current conditions are worse than would be the case with development contemplated under the draft plan, since such development could only occur with the completion of the wastewater system. The purpose of the RWCQB's order is to improve water quality by improving the quality and capacity of wastewater treatment in Los Osos. Therefore, assuming an adequate community wastewater system, buildout under the draft plan will result in less than significant impacts, and be an overall improvement over current conditions.

Impact WW-4: Water quality from wastewater generation in the Los Osos Area should improve ~~provided~~ when a community wastewater system is constructed. This is considered a beneficial impact ~~(Class IV)~~.

As stated above, much of the Los Osos Area is currently under an RWQCB prohibition on sewage discharge, which generally prohibits further construction within a specified zone. The RWQCB has ordered the construction of a local sewer system, which this analysis assumes will be built at the direction of the Los Osos CSD. This system will reduce impacts to groundwater stemming from septic system discharge in the community

of Los Osos. The treatment facility will be designed with a capacity to treat an average daily dry weather flow (ADWF) of approximately 1.365 mgd.[11] Septage pumped periodically form the septic tanks within the service area of the SSMMP will be received and treated at the wastewater facility site.

Impact WW-5: Consistency with Coastal Act Sections 30231, 30250, 30254, and 30255.

NOTE: This information has been added in response to Coastal Commission comments received.

30231. The plan includes programs to minimize the effects of wastewater discharge (mentioned earlier in this section). Issues associated with drainage and riparian areas are addressed elsewhere in this EIR. The plan prevents depletion of ground water supplies primarily by requiring development to analyze effects on ground water supplies (including agricultural supplies) prior to permit approval, and includes other policies and programs aimed at sustainable water use.

30250. Impacts to coastal resources are addressed throughout this EIR. In general, the Area Plan is consistent with this section, in that it concentrates development in existing developed areas, and requires evidence of adequate services prior to permit approval. Development is generally allowed at the minimum density allowed law.

30254. Highway 1 is addressed in Section 5.1, but is purposefully not proposed to be widened in accordance with this section. In terms of wastewater-related public works facilities, the plan does not identify extensions except in Los Osos in areas considered part of the sewer service area, largely limited to existing developed portions of Los Osos, and even then conditions development on a number of levels. The plan does not call for formation or expansion of special districts. The County's Coastal Plan policies document contains a public works policy (8, pg. 8-8) which places priority on coastal-dependent developments consistent with the Coastal Act.

30255. The County's Coastal Plan policies document contains a public works policy (8, pg. 8-8) which places priority on coastal-dependent developments consistent with the Coastal Act.

The Area Plan is considered consistent with these sections of the Coastal Act.

e. Other Watershed.

Table 5.5-4 illustrates the amount of additional flow calculated for buildout in the Other Watershed under the proposed draft area plan.

[11] Final EIR Wastewater Facilities Project. Los Osos CSD. 2001.

Table 5.5-4: Other Watershed Wastewater Calculations

Land Use	Existing Units[1]	Rate (gpd)[2]	Existing flow (mgpd)	Number of units at Buildout	Projected flow (mgpd)	Potential flow Increase (mgpd)	Potential Septage Increase (gpd)[3]
Residential	175	200/du	0.033	432	0.082	0.049	490
Other	50 camping sites	30 (50% occ.)*	0.0015	52	0.0016	0.0001	1
Total			**0.0345**		**0.0836**	**0.0491**	**491**

[1] All numbers are from Section3.0, "Project Description" unless otherwise noted.
[2] Residential rates are from the County Department of Planning and Building, and all others are from the *San Luis Obispo Area Plan EIR*, unless otherwise noted.
[3] Septage generation is based on an assumption of 1% of total flow as residue as per the *San Luis Obispo Area Plan EIR*, 1995. Septage generation is not considered for communities in wastewater service districts.
* Wastewater flow rates for camping are actually the lowest available for motel units (North Coast Area Plan EIR, 1997). Given the range of rates available, these figures are assumed to be a best guess for usage in camping and RV parks.

Impacts in this area are similar to those discussed for the "Rural Area" above. In addition, these impacts occur mostly in the San Luis Obispo Planning Area and are discussed in detail in the *Final Environmental Impact Report for the Land Use Element San Luis Obispo Area Plan*, August 1995.

f. Public Facilities.

Table 5.5-5: Public Facilities Wastewater Calculations

Land Use	Existing Persons[1]	Rate (gpd)[2]	Existing flow (mgpd)	Number of persons at Buildout	Projected flow (mgpd)	Potential flow Increase (mgpd)	Total Treatment Available
Cuesta College	11,942 persons	20/ person	0.2388	12,983	0.2597	0.0209	
California Mens' Colony	8,285 persons	50/ person	0.414	8,800	0.440	0.026	
County Operational Center	752 persons	50/ person	0.038	891	0.0446	0.0066	
Camp San Luis Obispo	1,000 persons	50/ person	0.05	1,000	0.05	0	
Total			0.7408		0.7943	0.0535	1.2 mgpd

[1] All numbers are from Section 3.0, "Project Description" unless otherwise noted.
[2] All rates are from the *San Luis Obispo Area Plan EIR*, 1995.

Projected growth in this region would increase wastewater flow to the CMC treatment plant, however, total flow would not exceed the significance thresholds mentioned above. Therefore, this impact is considered less than significant. Full utilization of the greywater system at CMC, which is currently in place, would further reduce wastewater impacts.

5.5.3.3 Mitigation Measures

No additional mitigation measures are required.

5.5.4 Cumulative Impacts

Cumulative buildout under the proposed plan would increase demands on both municipal and septic wastewater treatment systems. Cumulative impacts to each disposal system are discussed below.

Wastewater Treatment Plants.

Although growth as delineated in the Estero Area Plan would increase flow to the Morro Bay treatment plant, the system has sufficient capacity for projected wastewater increases. Therefore, cumulative impacts to this system would be less than significant. Growth in Los Osos is planned to be accommodated by the proposed Los Osos Sewer; development of a wastewater treatment plant in this community would ensure adequate treatment levels and is therefore a beneficial impact. However, if this project is not developed, the moratorium would remain in effect and additional septic systems would not be allowed within the prohibition areas.

Septic Systems.

Additional development outside of the future sewer ~~service~~ collection area in Los Osos will include the installation of new, additional, septic systems. These systems will add effluent to the groundwater system; ~~and result in a general reduction in water quality~~ however, new septic systems would be designed to current engineering standards based on site-specific information, and would be subject to criteria outlined in the RWQCB Basin Plan, and the County Health and Building Divisions. Assuming such systems are properly sited and maintained, impacts to groundwater quality would be less than significant. Septage that is produced by additional septic systems will be treated at the new wastewater facility under the SSMMP. The net result of installing the wastewater treatment system is by design, supposed to achieve an increase in water quality, therefore, cumulative impacts from additional septic system development should be less than significant in this area. If the wastewater treatment project is not developed, and additional septic systems continue to be built outside the prohibition area, impacts are not considered cumulatively considerable. Although additional systems may be built, septage generated in these areas is not anticipated to substantially contribute to an exceedance of septage treatment capacity at the City of Santa Maria treatment plant. Impacts are considered less than significant.

Other Areas.

As previously discussed, disposal for septage generated within the Estero planning area is currently provided by the Santa Maria treatment plant. Buildout under the proposed plan would result in a total septage generation of approximately 1,429 gpd. Because of the periodic nature of septage disposal, and the large capacity of the City of Santa Maria treatment plant, septage generated by buildout under the proposed plan is not anticipated to substantially contribute to an exceedance of the plant's capacity. Therefore, the project's contribution to cumulative impacts associated with septage disposal are considered less than significant.

5.6 Drainage & Water Quality

This section discusses drainage and water quality issues in the plan area and potential impacts from additional development.

5.6.1 Setting

The climate of the Estero planning area is characterized by relatively low rainfall, warm summers and mild winters. The average annual precipitation in the Estero planning area is approximately 15.73 inches (based on the standard thirty-year period), and can be extremely variable locally. Approximately 93 percent of the precipitation occurs between November and April. Runoff within the planning area is directly related to precipitation events as climatic characteristics are not conducive to continuous runoff. Streamflow is usually seasonal or intermittent and diminishes rapidly at the conclusion of the winter rainfall season because of the absence of snowpack.

Water quality varies seasonally and decreases as surface flows are reduced during the summer months. Sources of water quality degradation within the planning area and upper watershed include surface runoff from oil operations, agricultural and range lands, urban land uses, mines, and natural sedimentation.

5.6.1.1 Existing Conditions

a. Area-Wide Drainage

1. Drainage Systems. The planning area contains seven major drainage systems and a number of smaller tributaries to these drainages including Villa, Cayucos, Willow, Toro, Morro, Chorro, and Los Osos Creeks (Figure 5.6-1). These creeks originate at the eastern edge of the planning area in the Santa Lucia Range and flow west, discharging into the Pacific Ocean.

2. Flooding. Several areas within the Estero planning area are prone to flood hazard including areas adjacent to creek channels and the Morro Bay Estuary (Figure 5.6-2). Areas considered prone to flood hazards are those subject to a 100-year flood. A 100-year flood is an event determined by hydrologic analysis to have a one percent chance of occurrence per year and is the standard event from which residential and commercial areas are to be protected. The Federal Emergency Management Agency (FEMA) calculates and maps 100-year flood plains for insurance and planning purposes. In cases where this level of protection cannot be provided, flood insurance is required.

Stream flow volumes associated with flooding are generally discussed in terms of recurrence interval which defines the frequency at which a given size flow is likely to occur. Therefore, a 100-year flood is the flow volume that is statistically expected to occur on the average of once every 100 years. The 100-year flood plain, as calculated using HEC-2 cross-sectional modeling accepted by the Federal Emergency Management Agency (FEMA), is generally used as a threshold to assess flood hazards for planning and insurance purposes. Areas within the major drainage system of the Estero planning area that are vulnerable to flooding during a 100-year event are shown in Figure 5.6-2.

Natural flooding in the planning area is most severe in the Los Osos Creek system and its tributaries, especially in the Warden Lake area and the upper reaches of the Los Osos estuary as discussed further in this section.

Flooding in the Chorro, Cayucos, Little Cayucos, and Old Creek systems within the Area Plan is generally limited to areas immediately adjacent to defined stream channels, and can be characterized as less severe in flood inundation than that which occurs on the Los Osos Creek system. The Flood Insurance Study (FIS) conducted by FEMA for San Luis Obispo County notes that runoff from all the streams in the County is very small with appreciable flows occurring only during and immediately after precipitation. However, streamflow increases rapidly during large storms and flood waters can contain high amounts of debris, causing major flood damage.

b. Community Specific Drainage Characteristics

Rural Estero. Portions of the upper reaches of the creeks in the rural area of the Cayucos and Los Osos Community areas are subject to flood hazards. Flood plains defined for these upper reaches are generally limited to well-defined creek channels. The rural area is also subject to flooding within the Villa and Toro Creek systems. The 100-year flood plains for these systems are generally limited to areas adjacent to the stream channel along their upper reaches, with more extensive flooding occurring in estuary areas near mouths of the creek system. Other portions of the rural area may also be subject to storm surges along the coast.

Cayucos. Major drainages within the Cayucos area include Villa Creek, Cayucos Creek, and Little Cayucos Creek. These drainages all flow through the northern portion of the community area. Old Creek, controlled by Whale Rock Dam, and the smaller Willow Creek drainage are located at the southern end of the community area. Flooding associated with the Cayucos and Little Cayucos Creeks is limited to areas immediately adjacent to the stream channel, and tends to increase in the estuary areas.

As previously discussed, the Old Creek system is controlled by Whale Rock Dam, which provides water supplies to the City of San Luis Obispo, Cayucos, and other agencies. Flooding along the upper reaches of the Old Creek drainage system is limited to areas along the eastern bank of the reservoir and along the channel of Cottontail Creek. These floodplains do not threaten any urban development. The controlling influence of Whale Rock Dam also limits the flooding potential along the lower reaches of Old Creek with the 100-year floodplain conforming to the creek channel. Additional floodplains within the Cayucos area include the 100-year floodplain of Willow Creek which drains areas south of the Old Creek system. This floodplain is limited to areas immediately adjacent to the creek channel and estuary.

Although urban development downstream of the dam is protected from 100-year flooding associated with precipitation events, these areas are subject to potential inundation associated with dam failure. At full capacity, Whale Rock Reservoir contains 40,600 acre-feet of water held by an earth-filled dam. In the event of a failure, extensive areas of urban development in the Cayucos community north and south of the Old Creek channel, including Highway 1, would be subject to inundation and/or damage.

Residents have expressed concerns about localized drainage problems in the southern hillside areas of Cayucos due to a lack of an area-wide storm drain system.

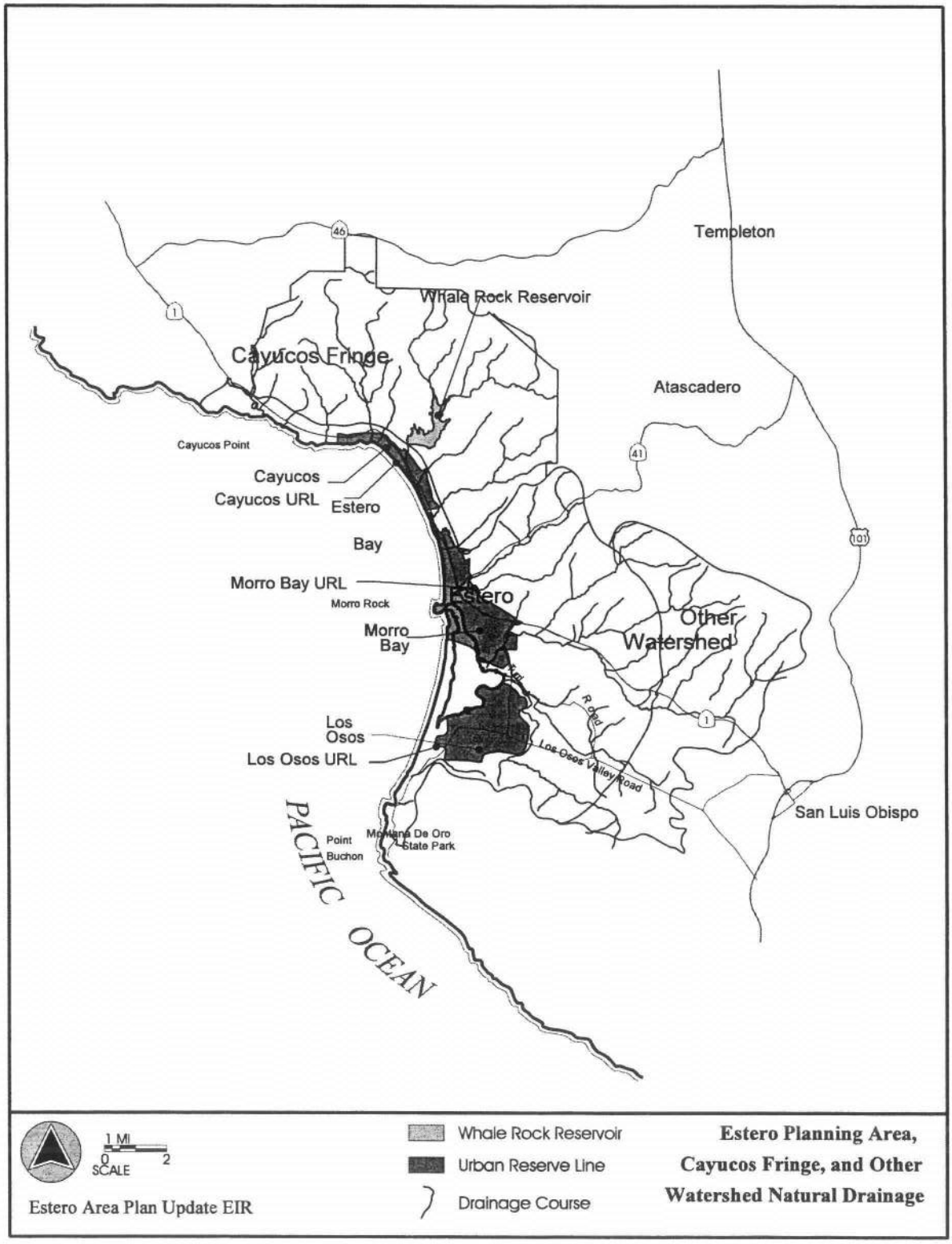


Figure 5.6-1: Natural Drainage Areas

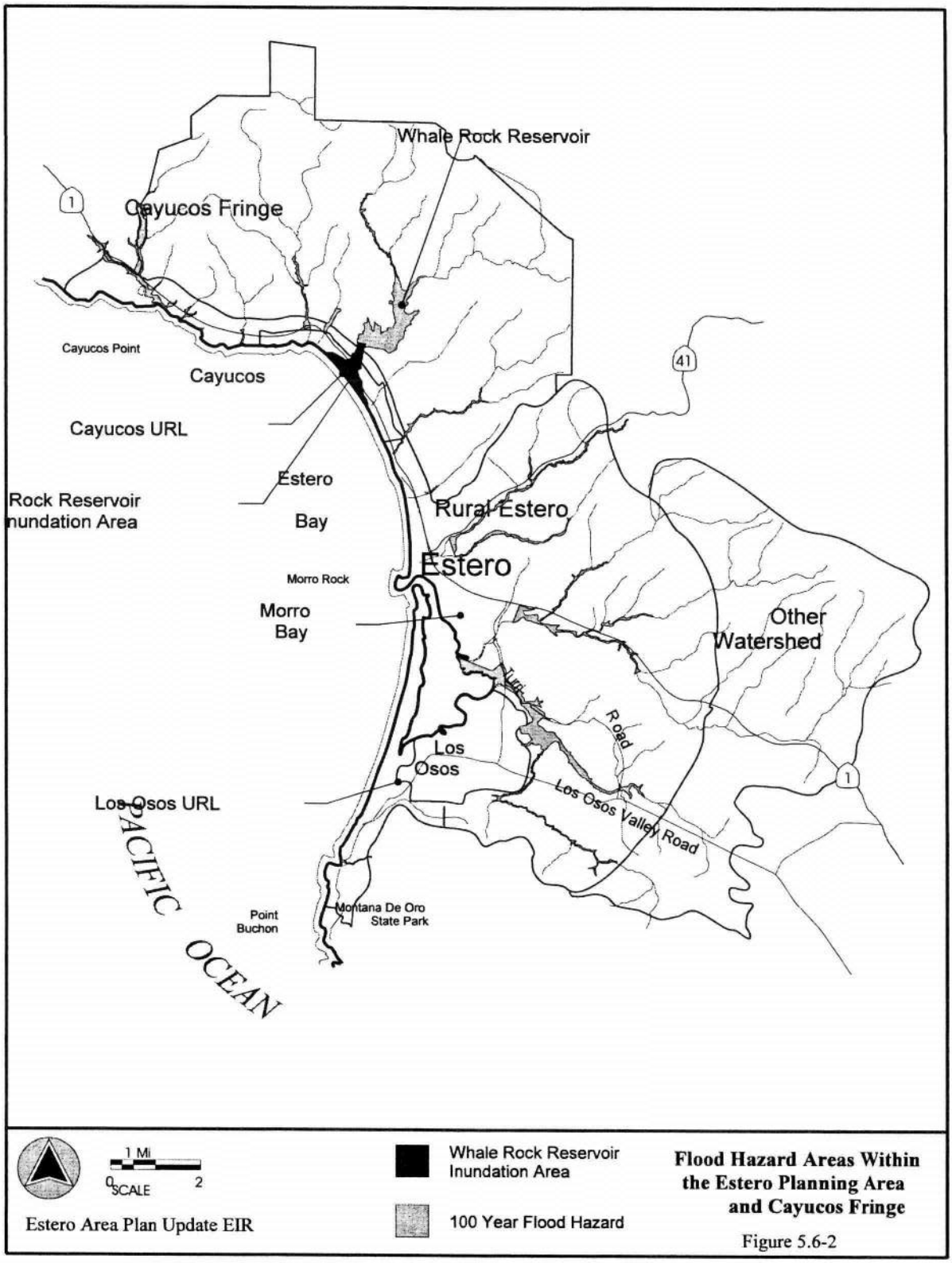


Figure 5.6-2: Flood Hazard Areas

Los Osos. Two of the Estero Area's major drainage systems, the Chorro and Los Osos Creek systems, are located east of the Los Osos area and flow into Morro Bay. The Chorro Creek system drains agricultural and upland areas north of the Morros and discharges into the northern portion of the bay near South Bay Boulevard. Major tributaries include Bernardo and San Luisito Creeks which drain areas north of Highway 1. The 100-year flood plain of Chorro Creek includes portions of both of these tributaries as well as the main stem. Flood plain areas are generally limited on the south by the Morros and on the north by Highway 1 which is located above the 100-year flood plain.

The Los Osos Creek system includes two tributary areas and is located south of the Morros. The northern tributary drains flat agricultural areas of the Los Osos Valley including Warden Lake. The southern stem of the creek drains the Clark Valley, located on the southern flank of the Irish Hills. Flood plains for each of these tributaries are generally limited to areas immediately adjacent to the creek channels. However, the Warden Lake area and the upper reaches of the Los Osos estuary are subject to standing water during precipitation events.

Localized flooding occurs during and immediately after significant rain in the Los Osos area. Flooding is a result of several factors including:

- Improper drainage and storm drains for unpaved roads especially in residential areas of Los Osos;
- The Los Osos urban area does not have a community-wide storm drainage system;
- The Los Osos community lies at the bottom of a large watershed and receives surface flows from the upper watershed area; and
- The neighborhoods of El Morro and Cuesta-by-the-Sea lie on flat terraces with sumping conditions which do not allow storm water to drain into the bay.
- Reduction of the area available for the stormwater infiltration
- Rising groundwater levels

Additionally, numerous intersections within the community experience flooding during storm events including 8th Street at El Moro Avenue, 17th Street at Paso Robles Avenue, Los Olivos Avenue at Fairchild Way, Ferrell Street, Don Avenue at Mitchell Drive, Los Osos Valley Road at Palisades Avenue, and Ramona Avenue at 11th Street.

Other Watershed Area. The Other Watershed area encompasses the area between the Estero planning area boundary and the Santa Lucia Mountains. This area comprises the upper watersheds for both the Los Osos and Chorro Creek drainage systems which drain westward to the Pacific Ocean. Portions of the watershed area are subject to flood hazards associated with the Los Osos and Chorro Creek drainage systems (see Los Osos area discussion above). Drainage in the upper reaches of the watershed area is generally confined to well-defined stream channels and flooding is limited in these areas.

Cayucos Fringe. Portions of the central area of Cayucos are subject to flood hazards associated with the upper reaches of Villa, Cayucos, Little Cayucos, and Cottontail Creeks. In addition, the areas along the eastern bank of Whale Rock Reservoir are also subject to flooding associated with 100-year storage in the reservoir. Flood plains within the Cayucos Fringe area are generally limited and do not pose a significant threat to populations or structures within the area.

c. Water Quality.

Surface Runoff. Stormwater runoff from rural and urban areas in the Estero Planning Area may contain excessive levels of pollutants (e.g., bacteria, nutrients, sediments, pesticides, herbicides, and hydrocarbons, heavy metals, and toxic chemicals) that could be contributing to degradation of the local waterways. Water quality degradation from stormwater runoff is primarily the result of runoff carrying pollutants from the land surface (e.g., streets, parking lots, and pastures) to receiving waters (i.e., canals, streams, lakes, and reservoirs). This type of pollution is referred to as nonpoint-source pollution because it generally discharges into surface waters in a diffuse manner and at intermittent intervals that are related mostly to the occurrence of meteorological events.

Nonpoint-source pollution generally cannot be monitored at its points of origin, and exact sources are difficult or impossible to trace; However, the types of pollutants that may be transported to the receiving waters are dependent on the land use and the associated land use activities.

Other water quality degradation includes wastewater seepage and stream dumping and spills. Improperly placed septic tank leachfields can cause similar types of pollution (e.g., coliform bacteria and nitrates) in groundwater and surface waters including streams and tributaries. Creeks and streams located near roads are vulnerable to illegal dumping of wastes and spills from accidents. Streams and creeks intersect numerous roads in the Estero planning area, greatly increasing the risks of contamination. Contaminants may include pesticides, herbicides, gasoline, and other ecologically harmful chemicals.

Groundwater Quality. Major groundwater basins within the Estero planning area include the Los Osos, Chorro Creek, Morro Creek, Toro Creek, Old Creek, Cayucos Creek, and Villa Creek. Principal uses and groundwater supply information are further discussed in Section 5.5, "Water Resources". Groundwater storage is replenished by stream percolation, precipitation, return flow of excess water applied for irrigation and other uses, and septic tank infiltration.

Groundwater quality in the Estero planning area varies with its source. Current ground water quality problems within the basin include increased levels of nitrates, iron, manganese, and organic solvents (PLEs, TLEs). Iron is an essential trace element for plants and animals, and manganese is a vital micronutrient. Exceedance of EPA's secondary standard for these constituents is not considered a human health threat because the standard for iron is based on its aesthetically unappealing staining fixtures, and manganese is not known to be a problem in water consumed by live stock but may be toxic to plants when in irrigation water applied to soils with pH values lower than 6.0 (U.S. Environmental Protection Agency 1986).

Parts of the planning area are vulnerable to nitrate concentrations because of agricultural usage and a concentrated number of septic tanks. Once nitrogen is oxidized to nitrate it becomes extremely stable and long-lasting in the groundwater supply. Los Osos, in particular, has exceeded the maximum containment level (MCL) since 1979 (Engineering Development Associates et. al., 1998).

5.6.1.2 Regulatory Setting

a. Drainage

San Luis Obispo County Standards. Section 23.05.040 et. seq., of the San Luis Obispo County Coastal Zone Land Use Ordinance contains the County's standards for the control of drainage and drainage facilities to minimize the harmful effects of storm water runoff and to protect neighboring and downstream properties from drainage problems resulting from new development. These standards include:

- Requirements pertaining to the design and construction of drainage systems;
- Requirements pertaining to the maintenance of offsite natural drainage patterns;
- Requirements pertaining to location of development in the coastal area; and
- Restrictions on development in areas subject to flood hazards.

Conditions of development in flood hazard areas must, at a minimum, enforce the current federal flood plain management regulations as defined in the National Flood Insurance Program. Projects that may be subject to or cause flood hazards are required to prepare a drainage plan, subject to approval by the County's Engineer.

In addition, Section 23.07.060 of the County's Coastal Zone Land Use Ordinance contains development standards for areas with the Flood Hazard (FH) combining designation. The standards contained in this section state that drainage plans for development in FH areas must include a normal depth analysis that determines whether proposed development is in the floodway or the flood fringe. In addition, development in FH areas would be subject to construction practices that would not limit floodway capacity or increase flood heights.

These standards include other provisions such as floodproofing, appropriate design, and other appropriate methods that would minimize potential risk to lives and property.

A number of standards have been proposed as part of the concurrent CZLUO amendment package proposed for the Coastal Zone in San Luis Obispo County which address water quality, drainage and groundwater recharge. The EIR cannot rely on these standards and policies as mitigation because they are not included in the Area Plan Update and are not yet approved; however, they provide information regarding County-led efforts to address drainage issues in the Coastal Zone.

Coastal Zone Land Use Ordinance (CZLUO) Standards. The following text regarding standards is currently proposed for inclusion in the Coastal Zone Land Use Ordinance[1]:

- **Natural Drainage Courses and Setbacks** - To the maximum extent feasible, all drainage courses shall be retained in or enhanced to appear in a natural condition, without channelization for flood control. New development shall be set back from the upland edge of riparian vegetation the maximum amount feasible. In the urban areas (inside the URL, except as otherwise shown in Table 7-2, "Coastal Stream Setbacks" for Cayucos), this setback shall be a minimum of 50 feet. In the rural areas (outside the URL), this setback shall be a minimum of 100 feet. A large setback will be preferable in both urban and rural areas, depending on parcel configuration, slope, vegetation types, habitat quality, water quality, and any other environmental considerations. A greater setback may be required by other standards in this plan. The setback area shall be maintained in an undisturbed condition and restored with a buffer strip consisting of native vegetation, where applicable.

- **Development Location** - New development shall be sited to avoid areas with high constraints or sensitivity for erosion potential, such as areas of alluvium near stream channels, areas underlain by the Franciscan Formation with slopes greater than 20 percent or areas of existing landslides.

- **Wastewater** - Wastewater from on-site sewage disposal systems shall not adversely affect groundwater resources or sensitive habitat.

- **Municipal Well-Head Protection–Referrals** - The purpose of this standard is to protect groundwater resources from contamination by proposed development.

  Land use permit applications requiring discretionary review for uses within one mile of a municipal well (locations of municipal wells are shown in Figure 7-4 [Amendment Package]) that have the potential to release toxic or hazardous materials (e.g. gas stations, businesses that handle hazardous wastes) shall be referred to the County Environmental Health Division for review and appropriate recommended measures that assure protection of water quality. Recommended measures may include, but are not limited to the following:
  A. Determining the extent of areas that contribute water to municipal wells, and making further recommendations as appropriate.
  B. Relocating proposed uses relative to municipal wells, especially where such uses involve the manufacture, storage or handling of hazardous materials.
  C. Concentrating or clustering development relative to the location of municipal wells.
  D. Reducing the density or intensity of proposed uses.
  E. Limiting the amounts of potential contaminants that may be stored or handled.

- **Water Runoff** -
  A. *Sensitive Habitat and Groundwater.* Runoff from roads and development shall not adversely affect sensitive habitat, groundwater resources and downstream areas, and shall be treated to remove floatable trash, heavy metals and chemical pollutants as necessary prior to discharge into surface or groundwater.

[1] *Coastal Zone Land Use Ordinance Amendment Package.* County of San Luis Obispo (2003).

B. *Impervious Surfaces.* New development shall be designed to minimize the amount of impervious surfaces.
C. *Stormwater Infiltration.* The design of drainage facilities in new land divisions and other development subject to discretionary review shall maximize groundwater recharge through on-site or communitywide stormwater infiltration measures. Examples of such measures include constructed wetlands, vegetated swales or filter strips, small percolation ponds, subsurface infiltration basins, infiltration wells, and recharge basins. Where possible, recharge basins shall be designed to be available for recreational use.
D. *Landscape Plans–Nutrient Runoff.* Landscape plans that are required by Chapter 23.04 of the Coastal Zone Land Use Ordinance shall include a note that fertilizers and nutrients are to be applied at rates that establish and maintain vegetation without causing nutrient runoff to surface waters.

- **Chemical Control** - Land use permit applications that require discretionary review for projects that have potential to release toxic or hazardous materials (e.g. gas stations, businesses that handle hazardous wastes) shall include measures, and where applicable Best Management Practices that: a) minimize the amounts of potential contaminants that may be stored or handled; b) assure proper containment and c) prevent release of contaminants into the environment. These measures and practices shall be referred to the County Division of Environmental Health for review and for recommendations that shall be implemented through the land use permit.

City of Morro Bay Standards. The City of Morro Bay also has standards regulating drainage within the city limits. Compliance with these standards is examined for portions of the planning area that have the potential for annexation to the City. City standards focus on areas located within or near the 100-year flood plain. Chapter 17.84 of the Municipal Code and the City's Flood Management Policy Handbook recommend that a site-specific hydrologic study be performed for any development within the 100-year flood plain in order to assess the development's effect on drainage within the flood plain.

Floodplain Management Regulations. FEMA is responsible for identifying and mapping floodplains, and development in these floodplains is subject to the requirements set forth in the Federal Insurance Program.

Clean Water Act. Section 404 of the Clean Water Act (CWA) prohibits the discharge of dredged or fill material into waters of the United States or adjacent wetlands without a permit from the U.S. Army Corps of Engineers (Corps).

Coastal Act. The following sections of the Coastal Act pertain to drainage:

30220. Coastal areas suited for water-oriented recreational activities that cannot readily be provided at inland water areas shall be protected for such uses.

30230. Marine resources; maintenance. Marine resources shall be maintained, enhanced, and where feasible, restored. Special protection shall be given to areas and species of special biological or economic significance. Uses of the marine environment shall be carried out in a manner that will sustain the biological productivity of coastal waters and that will maintain healthy populations of all species of marine organisms adequate for long-term commercial, recreational, scientific, and educational purposes.

30231. Biological productivity; water quality. The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of wastewater discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface water flow, encouraging wastewater reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.

b. Water Quality.

San Luis Obispo County Standards. Section 23.06.100 of the San Luis Obispo County Coastal Zone Land Use Ordinance provides a procedure for the notification of the Central Coast Regional Water Quality Control Board to review any new land use or modification of an existing use that may affect water quality. In addition, the State Water Resources Control Board requires that any construction activity disturbing an area of greater than one acre obtain a General Construction Activity Storm Water Permit. To comply with the permit, a "storm water pollution prevention" plan (SWPPP) using best management practices is required.

Porter-Cologne Water Quality Act. The Porter-Cologne Water Quality Control Act of 1969 (Water Code 13000 et. seq.) established the State Water Resources Control Board (SWRCB), divided the state into nine hydrographic basins, and established an Regional Water Quality Control Board (RWQCB) for each basin. The Porter-Cologne Act requires the SWRCB or RWQCBs to adopt water quality control plans for protection of water quality. A water quality control plan must:

- identify "beneficial uses" of water to be protected,
- establish water quality objectives for the reasonable protection of the beneficial uses, and
- establish a program of implementation for achieving water quality objectives.

The SWRCB is the primary state agency responsible for formulating policies to protect the state's surface waters and ground water supplies and approves water quality control plans prepared by each RWQCB. EPA has granted California primacy in administering and enforcing provisions of the Clean Water Act and the National Pollution Discharge Elimination System (NPDES). NPDES is the primary national program that regulates point-source and nonpoint-source discharges to surface waters. EPA oversees the review of waste discharge permits and CWA grant proposal applications. Each RWQCB has developed basin plans for its region that identify important regional water resources and beneficial uses and that provide for the prevention and abatement of waste pollution and nuisance. The plans also provide the basis for determining allowable waste discharges, taking enforcement actions, and evaluating clean water grant proposals. Basin plans are reviewed about every 3 years. The planning area is within the Central Coast RWQCB Region 3 jurisdiction.

Coastal Act. The following sections of the Coastal Act apply to water quality (in addition to those mentioned in connection with drainage):

30232. Oil and hazardous substance spills. Protection against the spillage of crude oil, gas, petroleum products, or hazardous substances shall be provided in relation to any development or transportation of such materials. Effective containment and cleanup facilities and procedures shall be provided for accidental spills that do occur.

30235. Revetments, breakwaters, groins, harbor channels, seawalls, cliff retaining walls, and other such construction that alters natural shoreline processes shall be permitted when required to serve coastal-dependent uses or to protect existing structures or public beaches in danger from erosion and when designed to eliminate or mitigate adverse impacts on local shoreline sand supply. Existing marine structures causing water stagnation contributing to pollution problems and fishkills should be phased out or upgraded where feasible.

5.6.2 Significance Thresholds

a. Drainage.

According to the State CEQA Guidelines, a project will normally have a significant effect on the environment if it will:

1. Substantially alter the existing drainage pattern of the project site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which

would result in flooding on- or off-site;

2. Substantially alter the existing drainage pattern of the site or area, including the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site;

3. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff

4. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map;

5. Place within a 100-year flood hazard area structures which would impede or redirect flood flows;

6. Expose people or structures to a significant risk of loss or injury involving flooding, including flooding as a result of the failure of a levee or dam; or

7. Inundation by seiche, tsunami, or mudflow.

Additionally, impacts would be potentially significant impact where development is proposed within identified flood-prone areas, as determined by Flood Insurance Rate Maps (FIRM), County Engineering and/or City Public Works staff.

b. Water Quality.

A project would normally have a significant effect on the environment if it will:

8. Violate any water quality standards or waste discharge requirements; or
9. Otherwise, substantially degrade water quality.

5.6.3 Proposed Project Impacts and Mitigation Measures

5.6.3.1 Area -Wide Impacts

a. Drainage

Special Policies, Programs & Standards Proposed in the Area Plan
Many of these provide mitigation to impacts that could result from development under the Estero Area Plan. **NOTE: subsequent modification or elimination of the policies cited in this section may modify the conclusions of this EIR.**

10. New development shall be designed to minimize the amount of impervious surfaces;
11. Drainage facility designs in new land divisions and other development subject to discretionary review shall maximize groundwater recharge through on-site or community-wide stormwater infiltration measures. Recharge basins shall be designed to be available for recreational use;
12. Runoff from roads and development shall not adversely affect sensitive habitat, groundwater resources, and downstream areas; and
13. Flood -prone natural drainage courses (Los Osos, Chorro, Morro, Toro, Willow, Old, Cayucos, Little Cayucos, and Villa Creeks and tributaries) should be maintained in their natural state to protect native vegetation and wildlife habitats.
14. Requirements for clustered or concentrated development that protects identified sensitive features;
15. County Engineering and Environmental Health Department should work with the community, property owners, water purveyors, and RWQCB to development and implement a water management program for the

Los Osos groundwater basin.
16. Natural drainage courses shall be maintained to the extent feasible or restored to the closest approximation of natural conditions. New development near channels shall be subject to prescribed setbacks.
17. New development shall be subject to certain constraints related to properties of soil and bedrock and slopes in certain areas addressed by the plan.

Impact DWQ-1: Changes in land use category designations may impact runoff patterns and volumes.

Implementation of the proposed Area Plan would result in designation changes of certain land use categories within the Estero planning area. Increases in the amount of impervious surfaces within drainage system watersheds associated with new development and stormwater runoff from buildout of the Area Plan would contribute to existing regional flooding problems in the planning area creeks and tributaries. Stormwater runoff generated from new roadways, commercial, residential development, and encroachment on flood plains, such as structures and fill, could potentially reduce flood-carrying capacity. Further, increased stormwater would enter local waterways, increasing flood heights, velocities, and flood hazards in areas beyond the encroachment itself. Existing flooding problems would be exacerbated and may result in loss of life and property. Without mitigation, these impacts would be considered significant. Implementing the proposed Area Plan policies, programs, and standards as well as recommended mitigation would reduce impacts to a less than significant level.

Impact DWQ-2: Potential Temporary Sediment Erosion from Construction Activity Spoils.

Construction activities such as grading or excavating may result in increased erosion and the offsite migration of sediments. Erosion of construction activity spoils into creeks and associated tributaries could impair drainage in watercourses downstream of the individual project sites. Downstream deposition of entrained sediments could potentially reduce carrying capacities of natural channels and drainage infrastructure. Potential impacts could occur if the rate of sediment generation exceeds the rate of sediment transport in a creek, a frequent occurrence during wet weather. Sediment deposition on the channel bed can displace aquatic fauna and prevent adequate water circulation through fish eggs and can disrupt feeding behavior and photosynthesis within aquatic flora. Without mitigation, increased erosion and subsequent offsite sediment deposition associated with buildout under the Area Plan could result in significant impacts to drainage systems within the planning area. Adoption of the Estero Area Plan policies, programs, and standards as well as the recommended mitigation measures related to erosion control and resource protection would reduce drainage impacts to a less than significant level.

b. Water Quality

Impact DWQ-3: Potential Short-Term Increases in Turbidity and Sedimentation from Construction Activities.

Construction activities related to buildout under the proposed Area Plan could result in short-term decreases in the quality of storm water runoff because of increased sediment loading and turbidity. Disturbances that remove natural cover or change site topography such as grading or excavation could result in increased sediment and nutrient loading from the proposed planning area. The degree to which these activities affect water quality is determined largely by the timing of construction and rainfall. Consequently, sediment levels resulting from construction and grading would be much lower in summer than in the winter. Without mitigation, short-term decreased water quality could result in damage to drinking water supplies and fish habitat downstream. These impacts would be considered significant. Adoption of the proposed Estero Area Plan policies, programs, and standards and recommended mitigation measures that require erosion and sediment control plans for construction activities would reduce impacts to a less than significant level.

Impact DWQ-4: Potential Degradation of Stormwater Runoff and Creek System Water Quality Because of Urban Uses.

Buildout under the proposed Area Plan would result in long-term decreases in stormwater runoff quality because of the introduction of urban uses to undeveloped areas. Development could result in the increased use of hazardous materials such as oil, grease, heavy metals, and debris, as well as fertilizers and pesticides. Increases in these types of pollutants in storm runoff could potentially degrade the biological integrity of natural drainages in the area. Typically, the majority of urban pollutants are washed off the street during the first storm of the winter season provided that an adequate amount of rainfall occurs. Because the exact location of the development activities and associated drainage infrastructure is not known at this time, the specific levels of water quality degradation are not quantifiable. However, as the potential for surface water quality degradation exists, impacts to water quality associated with buildout under the proposed Area Plan are considered to be potentially significant. Adoption of the Estero Area Plan policies, programs, and standards associated with water quality and resource protection, in addition to recommended mitigation measures DWQ-1 through DWQ-3, would reduce the above impacts to a less-than-significant level.

Impact DWQ-5: Potential Degradation of Groundwater Quality

As described above in the "Setting" section, groundwater quality may be degraded by way of surface contamination resulting from development, runoff constituents, including oil and grease, heavy metals, fecal coliform, and residues of organic chemicals, would be of principal concern. This impact is considered significant because of human health and water quality impacts associated with contaminated groundwater. Adoption of the proposed Estero Area Plan policies, plans, programs, and standards associated with water, water quality, drainage, sewage disposal, and resource protection, in addition to recommended mitigation measures DWQ-1 through DWQ-3, would reduce impacts to a less than significant level.

Impact DWQ-6: Coastal Act Consistency

The Area Plan addresses drainage and water quality consistent with the Coastal Act requirements. The Area Plan includes policies and programs to protect marine resources, primarily by controlling the amount and quality of runoff, and maintaining riparian areas in healthy condition. The Area Plan also includes policies and programs addressing wastewater discharge, and encouraging wastewater reclamation. Section 5.6.1.2. references policies to control oil and hazardous substance spills. The Area Plan includes policies conditioning seawalls to include assessment of erosion and sand deposition issues. Based on analysis of the policies and programs contained in the plan, and those proposed in the draft CZLUO amendment, the plan is considered consistent with the Coastal Act. If the CZLUO amendment is not adopted, mitigation in this section and elsewhere in this EIR recommends amendment of the Area Plan with equal or better language.

5.6.3.2 Community Specific Impacts

a. Rural Area.

Special Policies, Programs & Standards Proposed in the Area Plan

18. Policy II.5. Protect groundwater supplies for agriculture. Reject proposed general plan amendments that increase density or expand urban areas if resulting development would adversely affect ground water supplies, quality or recharge capability needed for agricultural uses.

19. Policy II.A.2. Slow the process of bay sedimentation, and support efforts to ensure that water quality supports recreation, viable commercial fishing and shellfish mariculture industries, and a healthy ecosystem that harbors a diversity of wildlife.

As described in the Section 3.0, "Project Description", the acreage of the Rural Estero area would increase with the addition of 382 acres under the jurisdiction of Cuesta Community College and Camp San Luis Obispo, and two parcels totaling 48 acres of Agricultural land would be reclassified as Rural Lands. Additionally, two 10-acre parcels zoned for Public Facilities would be changed to Agriculture and 90 acres would be removed from the Los Osos Urban Reserve Line and added to Rural Estero for open space. No substantial expansion of the Cuesta Community College, Camp San Luis Obispo, or the California Men's Colony is anticipated.

Buildout under the proposed Area Plan would increase the number of dwelling units from 364 to 688 in the Rural Estero area. Increased dwelling development and impervious surfaces would contribute to an increase in stormwater runoff and water quality degradation. This impact is considered potentially significant. Adoption of the Estero Plan policies, programs, and standards and recommended mitigation measures would reduce potential impacts associated with drainage or water quality issues for the planning area to a less-than-significant level.

b. Cayucos Area.

Special Policies, Programs & Standards Proposed in the Area Plan

Program: Cayucos Drainage Plan. The County Public Works Department should facilitate preparation of a master drainage plan for Cayucos to identify and implement measures to prevent flooding, mudflows, and associated storm damage. The drainage plan should include as key components provisions to recharge groundwater and maintain natural drainage courses so that they can handle storm water runoff. The drainage plan should take into account the cumulative drainage and geologic impacts of future development.

Implementation of the proposed Area Plan would have similar effects on the Cayucos area to that described in the "Area-Wide Impacts" discussion above. Land use designation changes would involve reclassifying 10 acres in the Agriculture category to RMF and approximately 2 acres in the Recreation category to Residential Multi-Family and Commercial Retail along Little Cayucos Creek. Increases in surface water runoff and water quality degradation could occur as a result of short-term construction activities and increased impervious surfaces in areas located near Little Cayucos, Cayucos Creek, and Willow Creek systems. However, the proposed changes from Recreation to other categories on two acres along Little Cayucos Creek would not affect drainage or water quality, since those areas are within the creek corridor where development would not occur. Adoption of the proposed Estero Area plan policies, programs, and standards associated with water quality and resource protection, in addition to recommended mitigation measures DWQ-1 through DWQ-3, would reduce impacts to a less-than-significant level.

c. Cayucos Fringe Area.

The Cayucos Fringe Area does not lie within the jurisdiction of the proposed Estero Area Plan. It has been discussed in this analysis because drainage is a regional issue, and because it is important to understand drainage as it applies to the whole watershed. Proposed development in this area is expected to be low-density, and no significant impacts are expected to occur. General Building Code and Coastal Zone Land Use Ordinance requirements should mitigate any project-specific impacts.

d. Los Osos Area.

Special Policies, Programs & Standards Proposed in the Area Plan

20. Policy V.A.3. Provide for development that meets the needs of residents and visitors and can be sustained by available public facilities and resources.

The Preliminary Engineering Evaluation, Los Osos/Baywood Park Community Drainage Project for San Luis Obispo County Service Area No. 9J, prepared by Engineering Development Associates, was completed in April

1998 and analyzed existing drainage and flooding problems and provided recommendations for improvements for the problems experienced by Los Osos. The report identified 27 separate drainage areas in Los Osos which experienced drainage problems. The report stated that the most significant flooding problems occurred in residential areas as result of natural sumps, reduced permeability, and increased groundwater levels. Increased flooding was also a result of increased paving of open space, construction within natural drainages, and development of properties without proper onsite drainage containment. Primary areas of flooding concern included Los Osos Valley Road within the Los Osos urban reserve line (URL), and east of the URL near Cimarron Way.

Implementation of the proposed Area Plan would further contribute to the existing flooding and drainage issues occurring in Los Osos and is considered potentially significant. Water quality issues would be similar to that described in the "Area-Wide Impacts" discussion above. Adoption of the Estero Area Plan policies, programs, and standards, in addition to recommended mitigation measures DWQ-1 through DWQ-3 identified in this section would reduce impacts to a less-than-significant level.

e. Other Watershed Area.

Implementation of the proposed Area Plan would not adversely affect the Other Watershed area including the Los Osos and Chorro Creek drainage systems because the Other Watershed area is outside of the Estero planning area. Therefore, no impacts would occur.

5.6.3.3 Mitigation Measures

The following mitigation measures, in addition to implementing the proposed Area Plan policies, programs, and standards would reduce significant impacts to a less-than-significant level.

DWQ-1: Consistency with Applicable Drainage-Related Plans. All new development in or near existing drainage systems and associated tributaries shall be consistent with applicable existing (and proposed) drainage, grading, erosion control, and water quality-related policies, standards, and programs to the extent feasible including but not limited to the following:

- San Luis Obispo County Coastal Zone Land Use Ordinance including Section 23.05.020 et. seq., Section 23.050.040 et. seq., Section 23.05.030 et. seq., Section 23.07.060 et. seq., and Section 23.06.100;
- Water Quality Control Plan - Central Coast Basin including Best Management Practices (BMPs)

DWQ-2: Pollution Stormwater Grease Traps. New development shall implement measures to eliminate pollutants from storm runoff prior to its drainage offsite. Such measures include grease traps in association with sedimentation detention basins. Grease traps should be sized so that at least the first inch from any one storm is retained on the project site to percolate and/or evaporate. Smaller developments (individual houses, home additions) may be exempt at the discretion of County Engineering.

The reader should note that the above measure is typically required as part of stormwater plan approvals for specific projects.

DWQ-3: CZLUO Amendment. If the current draft CZLUO amendment package is not adopted, the proposed Area Plan shall be amended to include equal or better drainage and water quality protection measures.

5.6.4 Cumulative Impacts

a. Drainage

Cumulative impacts would result from increased stormwater flows within the proposed planning area. The continued construction of impervious surfaces such as roads, structures, and parking facilities may increase the frequency of localized flooding, in portions of Los Osos and the southern portion of Cayucos, for example, and subject more property to flood damage unless improvements to area drainage systems are made concurrent with development. Construction in adjacent planning areas (San Luis Obispo, Salinas River and others) would further contribute to drainage impacts countywide. There may also be a cumulative impact on the area's ecosystem (including the Morro Bay Estuary) from sedimentation caused by excessive runoff. Without mitigation, cumulative impacts could be significant. Adoption of the proposed Estero Area Plan policies, programs, and standards related to drainage and resource protection, in addition to the recommended mitigation measures and state and local regulations, would reduce impacts to a less-than-significant level.

b. Water Quality

Cumulative impacts to surface water quality would result from increases in urban pollutants associated with new development and continued agricultural and municipal discharges from municipal wastewater and agricultural drainage. Some existing agricultural lands may be converted to urban development, or very low density residential uses, changing the water diversion and discharge patterns for these lands. Increasing populations in the watersheds may result in higher concentrations of water quality constituents associated with wastewater and surface and urban pollutant runoff including oil, grease, heavy metals, and debris. Without mitigation, cumulative impacts could be potentially significant. Adoption of the proposed Area Plan policies, programs, and standards associated with water quality and resource protection, in addition to the recommended mitigation measures and state and local regulations, would reduce water quality impacts to a less-than-significant level.

5.6.5 Residual Impacts.

Compliance with recommended mitigation measures will reduce impacts to water quality and flooding to the extent feasible, as such measures would apply the best available technology. Although residual impacts are expected to be less than significant, minor incremental degradation to water quality may occur as a result of proposed development.

5.7 Public Services

This section assesses the impacts to area schools, fire and police protection, parks, libraries and solid waste disposal that would occur as a result of buildout of the proposed Estero Area Plan.

5.7.1 Setting

5.7.1.1 Schools

The Estero planning area includes portions of three school districts, San Luis Coastal Unified School District (SLCUSD), Coast Unified School District (CUSD), and Cayucos Elementary School District (CESD) (Figure 5.7-1). SLCUSD operates two elementary schools and one junior high school within Los Osos as well as two elementary schools and a high school within the City of Morro Bay. CUSD operates Coast Union High School in Cambria. CESD serves the Cayucos area and operates the Cayucos Elementary School. The following discussion describes existing conditions for each area served by the school districts previously mentioned.

Rural Estero. As mentioned in Section 3.0, "Project Description", Rural Estero encompasses all land not within urban reserve lines of Cayucos, Los Osos or the City of Morro Bay. Approximately 75% of the land in this portion of the planning area is reserved for agricultural uses. Students within this area are served primarily by the SLCUSD.

Cayucos. CESD operates one K-8 school that has a permanent capacity of 240 students and, in 2002/03 enrolled 239 students.[1] Because of the school's small 3.7-acre site, the campus lacks the facilities to provide an adequate program for middle school students as well as adequate physical education and athletic programs. The CESD's enrollment has been declining in recent years due to the relatively high costs of homes in the area. The construction of a new school facility in 2000 was abandoned due to the current and projected decline in enrollment.

The CUSD also serves the Cayucos area. High school students attend CUSD's Coast Union High School in Cambria. Students from the Cayucos area accounted for approximately forty percent of the high school's total enrollment of 347 students in 2002/03 (total enrollment includes Leffingwell High)[2]. The high school completed the construction of 12 new classrooms and modernization of 8 portable classrooms in Fall of 2002.[3] About 30% of the classrooms are contained in the portable units. This construction was funded by Measure "A" funds allocated in 1998.

Los Osos. SLCUSD serves portions of the Los Osos area and operates two elementary schools, the Los Osos Middle School, and Morro Bay High School. Approximately seventy percent of students at the middle school and high school come from Los Osos. The SLCUSD plans to make improvements to the high school and expand the elementary and middle schools through Measure "A" bond funding.

Table 5.7-1 describes the capacity and enrollment for area schools. Enrollment at the two elementary schools did not exceed school capacities in 2002/03. Los Osos middle school was slightly under capacity in the 2002/03

1 Personal Communication George Erdelyi, Superintendent/Principal, CUSD, July 15, 2003.

2 *Annual Resource Summary Report,* San Luis Obispo County Department of Planning & Building, 2002.

3 Personal Communication Dennis DeClerq, Facilities Manager, CUSD, July 17, 2003.

school year with an enrollment of 610 students, and Morro Bay High School's enrollment was below its capacity of 1,000 for the same period.

Table 5.7-1: Capacity and Enrollment, Estero Area Schools

School	Capacity	01/02 Enrollment	02/03 Enrollment	Projected Enrollment @ Buildout	Projected Enrollment as % of capacity
Los Osos Elementary Schools (combined)	1220	780	879	1117	92
Los Osos Middle School	725	524	610	726	100
Morro Bay High School	1000	964	954	1,135	114
Cayucos Elementary	240	260	239	383	160

Source: *Draft Estero Area Plan Update (2003)*. Personal communication Brad Parker, Facilities Manager, San Luis Coastal Unified School District, July 16, 2003.

Other Watershed Area. As described in Section 3.0, "Project Description", the Other Watershed Area refers to the upper areas of the Morro Bay watershed. The SLCUSD serves this portion of the Estero planning area and is discussed previously under "Los Osos" above.

Cayucos Fringe. The Cayucos Fringe is a secondary study area located in the Adelaida planning area. A portion of the planning area is served by the CESD. For purposes of this analysis, only the Cayucos Elementary School District will be discussed in this section as it relates to school capacity impacts within the Estero planning area. For further discussion on the CESD, refer to the "Cayucos" discussion above.

b. School Funding Sources

With the passage of Proposition 1A in November of 1998, the fundamentals of financing school construction changed in the State of California. Since the passage of Proposition 1A, school districts are responsible for providing fifty percent of the new school facility costs. The remaining fifty percent are funded through the $9.2 billion state school bond fund approved by California voters. School fees on new development at the rate of $2.14 per square foot of residential development and $0.34 per square foot of commercial and industrial development may be imposed by cities and counties in order to meet their matching requirements. Local school boards could impose higher fees (up to 50% of land and construction costs) in order to meet their matching requirement, if certain conditions are met. Other funding mechanisms to generate new revenues available to school districts include, but not limited to, general obligation bonds and Mello-Roos bonds. For further discussion on school funding sources, refer to the San Luis Obispo County Department of Planning and Building Annual Resource Summary Report (2002).

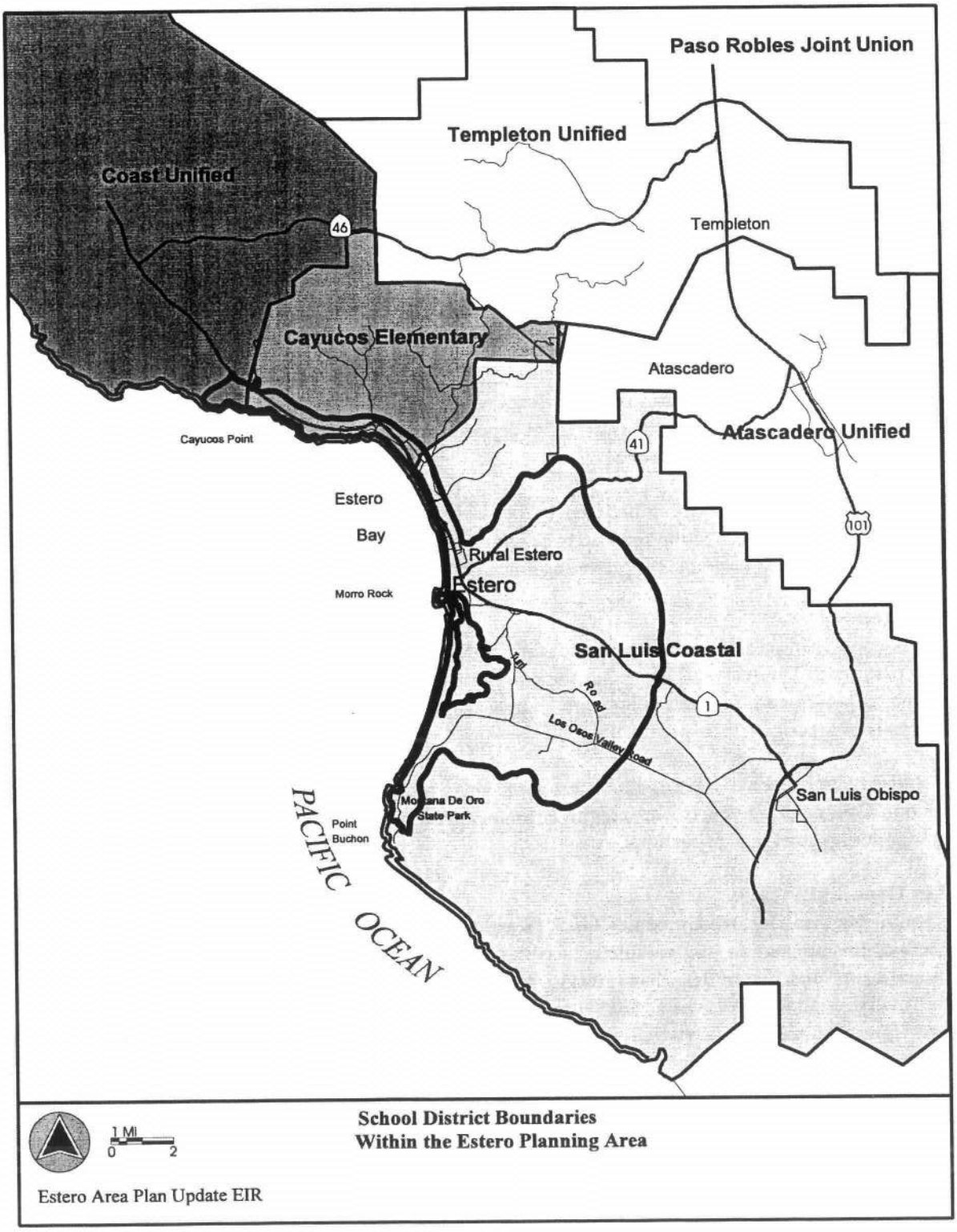


Figure 5.7-1 School District Boundaries in the Estero Planning Area

5.7.1.2 Fire Protection

a. Areawide Fire Protection Services

The California Department of Forestry (CDF) is responsible for preventing and controlling wildland fires and providing emergency medical assistance in the unincorporated portions of the Estero planning area, except in the urban areas of Cayucos and Los Osos. CDF acts as the County Fire Department by contract with the County. CDF/County Fire operates two stations in the Estero Area, one south of Cayucos, near the intersection of Toro Road and Highway 41, and the other west of Devil's Gap on Highway 41 in the Santa Lucia Mountains. Staffing at the Cayucos station consists of a minimum of three fire-fighters during peak wildland fire seasons. Equipment at this station includes one CDF wildland fire engine. Station No. 14, located along Highway 41, is staffed by 15 volunteers and equipment includes one fire engine. Emergency response times typically range from eight to twenty minutes but vary depending on call location.

The Cayucos Fire Department and the South Bay Fire Department both provide local fire-fighting protection for their respective communities. Mutual aid from Station No. 10 in Cambria or Station No. 12 on Santa Rosa Road, would provide additional fire-fighting capabilities depending on call location. Response time within the Cayucos Fire Protection District is 2 - 3 minutes.

Emergency medical services are contracted by privately-owned companies in the city of San Luis Obispo. Although no hospitals exist within the Estero planning area French and Sierra Vista hospitals are proximate to the planning area and are capable of providing emergency room treatment and major medical services.

b. Cayucos

Fire protection, medical and rescue services for the Cayucos area are provided by volunteers through the Cayucos Fire Department. The station is located at the corner of Ash Avenue and Cayucos Drive and is staffed by one part-time employee and nineteen volunteers. The Cayucos Fire Department responds to approximately 270 service calls per year.

CDF and the Cayucos Fire Department have entered into a mutual aid agreement for the purpose of fire-fighting protection. Mutual aid agreements are reciprocal arrangements for fire protection agencies to share personnel and resources during emergency situations.

c. Los Osos and Vicinity

The South Bay Fire Department of Los Osos provides fire protection, fire prevention and paramedic services to Los Osos and a large area east of the urban reserve line (C.S.A. 9, Zone I). The station is located at 2315 Bayview Heights Drive. The Department is staffed with eight full-time firefighters, four contract fire fighters, and twenty part-time volunteer reserves. The station is equipped with three engines, one four-wheel drive vehicle, a command vehicle, and one rescue squad car. Advanced life support equipment is in the reserve squad and in the engine.



d. Funding.

On August 20, 1991, the San Luis Obispo County Board of Supervisors adopted Ordinance No. 2519 establishing Title 18 of the County Code entitled "Public Facilities Fees." The ordinance established fees on new development in the county to pay for public improvements, public services, and community amenities that are needed as a result of development. The fees apply to construction permits issued for any development project and are intended to

provide funding for fire protection, general government services, parks and recreation, Sheriff's patrol, and fee administration. The fee amounts for various types of construction are presented in Table 5.7-2.

Table 5.7-2. Public Facilities Fees

Facilities	Residential (Per Dwelling Unit)		Non-Residential (Per 1,000 Building Sq. Ft.)		
	Single Family	Multi Family	Office	Retail	Industrial
Fire	$ 780	$ 445	$ 962	$577	$413
General Government	543	310	670	401	287
Parks & Recreation	1,676	956	N/A	N/A	N/A
Sheriff's Patrol	136	76	169	103	71
Library	315	181	145	87	62
Subtotal	$3,450	$1,968	$1,946	$1,168	$833
Fee Administration	87	50	49	30	21
Total	**$3,537**	**$2,018**	**$1,995**	**$1,198**	**$854**

Source: San Luis Obispo County Building & Planning Department, July 2003

As shown in Table 5.7-2, a portion of the development fees are used for county fire protection facilities. By law, the revenue generated by these fees can only be used to fund capital facilities, such as the purchase of land, construction of buildings, or the purchase of major equipment. The revenue cannot be used to fund employee salaries or other operations and maintenance expenses. This fund is to provide services countywide on an as-needed basis.

5.7.1.3 Police Protection

a. Current and Planned Services and Facilities

Police protection services are provided by the San Luis Obispo County Sheriff's Department for the Estero Area. Patrol services for the entire coastal area (including the plan area except within the City of Morro Bay) are provided primarily through the Sheriff's substation located in Los Osos. Other services, including investigative and emergency dispatch services, are provided through the county operations center on Kansas Avenue about four miles north of the City of San Luis Obispo. Additional police protection is provided by the California Highway Patrol (CHP). The CHP stations are located in the San Luis Obispo and Templeton areas and patrol all major roads and highways in the planning area.

b. Current Service/Facilities Standards.

The sheriff's substation in Los Osos is regularly staffed by approximately 26 sworn deputies and serves a geographic area that extends from Avila Beach to the Monterey County Line and east to the Cuesta Grade. In general, the number of areas patrolled by sheriff's deputies varies depending on the number of staff on duty. The smaller the number of staff on duty the greater the area patrolled by each officer. Current response times range from 23 to 30 minutes and can vary depending on call location and other factors.

According to the County Sheriff's Department, a ratio of one officer per 1,000 people (one per 750 residents is recommended by the County Sheriff's Office in the Estero Area update) is considered "normal" and would provide an adequate level of service. However, the ratio of deputies to population has declined to one deputy per 2,045 people in recent years because staffing levels have not kept pace with population growth. An estimated 35

deputies will be needed to meet the level of service recommended for the planning area. As discussed above, currently only 26 deputies serve the Estero Area in addition to a much wider area.

c. Funding.
A portion of the development fee is used to fund County Sheriff's patrol facilities. Sheriffs' patrol fees are described above in Table 5.7-2.

5.7.1.4 Solid Waste

a. Current and Planned Facilities/Services.
Solid waste collection services are provided by a private hauler. The contracted private hauler serves the entire Estero planning area, and delivers refuse to the Cold Canyon Landfill located in San Luis Obispo.

Cold Canyon Landfill currently occupies 67 acres within its 121-acre site, or 55% of the land area. The current rate of solid waste accepted is 170,000 tons per year (TPY).[4] Cold Canyon Landfill is expected to provide enough waste disposal capacity until the year 2017, at which time it may seek permits to expand capacity. The Chicago Grade Landfill, located east of Templeton, is also available for solid waste disposal. This landfill has a current permitted capacity of 3.10 million cubic yards [4]and is expected to reach capacity in 2018.[5] Recycling services are provided by Mission Country Disposal, with offices in San Luis Obispo.

b. Regulatory Framework.
The California Integrated Waste Management Act of 1989 (AB 939) requires all cities and counties in the state to develop integrated plans for the management of solid waste. These plans must include elements pertaining to source reduction, recycling, composting, market development, and landfill siting. In accordance with the Act, at least 25 percent of the waste stream was required to be diverted from landfills in each county by January 1, 1995, while a 50 percent diversion rate was mandated by January 1, 2000.[6]

To facilitate compliance with these waste diversion targets, the County has prepared a Source Reduction and Recycling Element (SRRE) for the unincorporated portions of the County. The SRRE will be incorporated into similar elements prepared by individual cities within the County to comprise the Integrated Waste Management Plan. This plan will guide the development of programs to divert waste from County landfills through such methods as source reduction, recycling, and composting.

5.7.1.5 Parks

a. Current and Planned Facilities

Parks are generally divided into four types: mini-parks, which are less than five acres in size and serve 500 to 2,500 people, neighborhood parks, which are less than twenty-five acres in size and serve 2,500 to 5,000 people, community parks, which are greater than twenty-five acres in size and serve more than 5,000 people, and regional parks, which are greater than 200 acres in size and serve more than 30,000 people. In the Estero planning area, regional parks include El Chorro Regional Park, Montana de Oro State Park, Morro Bay State Park, and local beaches. It is estimated that the communities of Cayucos, Morro Bay, and Los Osos have a combined total of

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4 California Integrated Waste Management Board (2000). *Active Landfills Profile for Chicago Grade Landfill.* Retrieved July 8, 2003 from <http://www.ciwmb.ca.gov/Profiles/Facility/Landfill/LFProfile1.asp?COID=40&FACID=40-AA-0008>

5 Jeanette Figgis. Chicago Grade Landfill. Personal Communication. July 9, 2003.

6 Jeff Clare, engineer. Cold Canyon Landfill. Personal Communication, July 8, 2003.

42 acres of neighborhood and community parks (1.5 acres per thousand residents). Neighborhood and community parks are described in Table 5.7-3. According to the Draft Estero Area Plan, existing facilities are meeting only about 50 percent of the estimated current need for neighborhood and community park acreage, even when school grounds are taken into account.

Table 5.7-3. Neighborhood and Community Park Acreage

Parks	Cayucos	Los Osos	Morro Bay
Hardie Community Park	4 acres		
Paul Andrew Community Park	1 acre		
South Bay Community Park		6.2 acres	
Bayshore Bluffs Park			3.28 acres
Del Mar Park			10 acres
Keiser Park			8.8 acres
Tidelands Park			5.3 acres
Cloisters Park			4 acres
Community Subtotals	**5 acres**	**6.2 acres**	**31.38 acres**
Elementary School Playgrounds	3 acres	10.5 acres	7.0 acres
Middle School Athletic Fields		7.5 acres	
High School Athletic Fields			10 acres
Community Subtotals	**3 acres**	**18 acres**	**17 acres**
Total	**8 acres**	**24.2 acres**	**48.38 acres**

5.7.1.6 Libraries

a. Current and Planned Facilities

Libraries in the Estero planning area are located in Cayucos, Morro Bay and Los Osos. Existing library facilities are detailed in Table 5.7-4. Library measures of service are based on both book stock and facility size.

Table 5.7-4. Library Facilities (2002)

	Building Square Feet		Book Stock (# of Volumes)	
	2002 Actual	2002 Desirable	2002 Actual	2002 Desirable
Cayucos	800	2100-2400	9409	10600-15200
Los Osos	3976	8700-9400	38345	39700-43300

5.7.2 Significance Thresholds

According to the State CEQA Guidelines, a project will normally have a significant impact on the environment if it would result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the *construction* of which [emphasis added] could cause significant environmental impacts, in order to maintain acceptable service ratios, response times other performance objectives for the following:

- Fire Protection;
- Police Protection;
- Schools;
- Parks; or
- Other Public Facilities (includes libraries)

CEQA is concerned with the environmental impacts of expanded services, especially those resulting from the construction of new facilities required to maintain service ratios, rather than directly with staffing issues. Assessment of personnel and staffing adequacy is complicated by local factors such as crime rates, management strategies, efficiencies, etcetera. Furthermore, increased services are typically funded through special tax assessments or bonds, which require a vote by the public. In Los Osos, for example, an increase in fire service funding was voted on as an initiative in the October 2003 special election. Therefore, for the purposes of this analysis, personnel and staffing are analyzed as indicators of the potential need for expanded facilities, not as the impact itself.

In addition to the above, professional interpretation of these guidelines indicates that a project will have a significant effect on the environment if :

- Solid waste generated by buildout cannot be accommodated at Cold Canyon Landfill.

5.7.3 Proposed Project Impact Analysis & Mitigation Measures

5.7.3.1 Area-Wide Impacts

a. Schools.

Special Policies, Programs, and Standards for the Proposed Area Plan

Program III.C.3: **School Closures.** When schools are planned to be closed, the applicable school districts should consult with the County Planning and Building and General Services Departments regarding future ownership and use of the sites.

Impact PS-1: Potential Increase in Student Enrollment Resulting in Unmet Demands for Schools.

Implementation of the proposed Estero Area Plan would increase the number of school age children needing educational services in the public school districts throughout the planning area. As previously described in Section 3.0, "Project Description", existing development in the Estero planning area is estimated at approximately 8,971 dwelling units. Students living in these dwelling units attend various schools inside and outside the planning area. The maximum number of dwelling units permitted under the proposed Estero Area Plan is estimated at 11,210, an increase of approximately 2,239 units.

Enrollment projections are based on "student generation rates". These rates are expressed as the number of students at various grade levels that may be expected to live in an "average" household. Projections made by school districts can be very detailed, with different generation rates for dwelling units. Simplified projections were developed for the proposed Estero Area Plan based on current student generation rates and were calculated without reference to different unit types, or other details.

Although other schools within each of the three districts have varying capacities and facility issues, Morro Bay High School and Cayucos Elementary are expected to exceed capacity in five years.[7] -No new high school is currently planned for the SLCSD which would alleviate overcrowding at Morro Bay High School. However, qualitative improvements are planned for the high schools within the district using Measure "A" bond revenue. The CESD is in the process of identifying a suitable 10-20 acre site for construction of a new school to alleviate school capacity issues for Cayucos Elementary School.

Given the existing shortage of facilities, new development generating an increase in the number of students would exacerbate the existing capacity problems. Without mitigation, this impact is considered significant because of the substantial increase in students and existing capacity problems at schools within the Estero planning area. Section 65995 of the Government Code prohibits a local agency from either denying approval of a development project because of inadequate school facilities or imposing school impact mitigation measures other than designated fees. For residential developments, mitigation is limited to $2.14 per square foot of assessable space; for commercial or industrial developments, mitigation is limited to $0.34 per square foot of chargeable covered and enclosed space. By imposition of these fees, the impact is considered by law to be reduced to a less than significant level.

b. Fire Protection.

Special Policies, Programs, and Standards for the Proposed Area Plan
No new policies specific to Area-Wide for Fire Protection

Impact PS-2: Potential Increase in Demand for Fire Protection from Local Fire Districts.

Development as allowed under the proposed Estero Area Plan would result in an increase of approximately 2,239 dwelling units throughout the planning area. This new development would increase the demand for structural and wildland fire protection services. Based on the estimated need for 765 square feet of fire protection facilities per 1000 members of the population (pursuant to a County analysis of Capital Facilities completed for the 1999 Draft Area Plan), projected fire protection needs can be quantified. The Estero Area has a projected increase in population of 7,701 people in the next twenty years. With this growth a new 4,000 square foot facility would be needed after 13 years (2016). It is difficult to predict the location or scope of the facility. As a result, it remains unclear whether such facilities, if needed, would have significant impacts on the environment. Any facilities proposed in response to growth under the Estero Area Plan would be subject to environmental review by the County. Therefore, potential impacts will be adequately addressed pursuant to CEQA Guidelines. Mitigation is recommended in the form of additional policy language to ensure the County reconsider the need for expanded fire facilities.

[7] *Annual Resource Summary Report,* San Luis Obispo County Department of Planning & Building, 2002

c. Police Protection.

Special Policies, Programs, and Standards for the Proposed Area Plan
No new policies specific to Estero Area-Wide for Police Protection

Impact PS-3: Potential Increase in Demand for Police Protection from Local Law Enforcement Agencies.

Implementation of the proposed Area Plan would increase the total population areawide by approximately 7,701 people at buildout. This increase in population would result in an increased demand for police protection services. Based upon the Sheriff's Department standard of 1.5 officers per 1,000 new residents, approximately 11 new deputies would need to be hired to adequately serve the Estero planning area plus additional deputies to adequately serve existing development. Facilities for police protection can be calculated at a ratio of 188 square feet per 1000 members of the population. Based on this calculation, a new 2000 square foot facility will be needed in 27 years, beyond the time frame of this plan. It is therefore unlikely that implementation of the Estero Area Plan will require construction of significant new police protection facilities. Any facilities proposed in response to growth under the Estero Area Plan would be subject to environmental review by the County. Therefore, potential impacts will be adequately addressed pursuant to CEQA Guidelines.

d. Solid Waste.

Special Policies, Programs, and Standards for the Proposed Area Plan
No new policies specific to Area-Wide for Solid Waste.

Impact PS-4: Potential Increase in Solid Waste Generation and Disposal at Existing Landfills.

Development under the proposed Area Plan would result in an increase of approximately 2,239 dwelling units and approximately 7,701 residents throughout the planning area. This new development would result in an increase in the amount of solid waste generated. Based on the generation rate of 7.8 pounds per person per day, an additional estimated 10,962 tpy of solid waste would be generated that would be disposed of at the Cold Canyon Landfill. When added to the current solid waste generation rate of 26,292 tpy, overall solid waste generation in the planning area would be approximately 37,254 tpy. Implementation of the County Integrated Waste Management Plan is anticipated to result in the continued diversion of at least 50 percent of solid waste generated in the planning area. Assuming that a 50 percent diversion rate continues, as mandated by the California Integrated Waste Management Board, the areawide disposal rate would be 31,773 tpy at plan buildout, an increase of 20 percent. The landfill is expected to have capacity for the County, including planned growth, through 2017. Permits for expansion could be filed as the limits of existing capacity are reached. Impacts are therefore considered less than significant.

e. Parks

Impacts associated with parks are addressed on a community-specific basis.

f. Library

Impacts associated with libraries are addressed on a community-specific basis.

5.7.3.2 Community-Specific Impacts

Rural Estero

Special Policies, Programs, and Standards for the Proposed Area Plan
No new policies specific to Rural Estero.

a. Schools.

Implementation of the proposed Area Plan would result in impacts similar to those described under the "Area-wide Impacts." Refer to "Area-Wide Impacts" section above for further discussion.

b. Fire Protection.

Impact PS-5: Potential Increase in Demand for Fire Protection from Local Fire Districts.

Impacts related to fire protection would be similar to those described under the "Area-wide Impacts" discussion above.

c. Police Protection.

Impact PS-6: Potential Increase in Demand for Police Protection from Local Law Enforcement Agencies.

Implementation of the proposed Area Plan would result in an increased population and demand for police protection services. Impacts are similar to those described under the "Area-wide Impacts" discussion above.

d. Solid Waste.

Impact PS-7: Potential Increase in Solid Waste Generation and Disposal at Existing Landfills.

Implementation of the proposed Area Plan would result in an increase in population and an increase of solid waste generation. Of the total 10,962 tpy additional solid waste generated within the planning area, approximately 767 tpy or seven percent would be generated within the Rural Estero area. Impacts would be similar to those described under the "Area-wide Impacts" discussion because the state has mandated that cities and counties reduce the amount of waste they generate. Implementation of the actions recommended in the Source Reduction and Recycling Element for the unincorporated areas of San Luis Obispo County would reduce solid waste disposal to the degree feasible and would reduce impacts to less than significant levels. No additional mitigation is necessary.

e. Parks

Special Policies, Programs, and Standards for the Proposed Area Plan

Policy IV.D.1: Promote development of recreational and visitor-serving uses, consistent with protection of agriculture and sensitive resources.

Policy IV.D.2: Locate new intensive recreational facilities and major visitor-serving commercial development

within or immediately adjacent to urban areas on site that do not contain prime agricultural land or significant sensitive habitat.

Policy IV.D.3: Limit uses [in the Recreation Category] to open space, recreation and visitor-serving related uses.

Policy IV.D.4: Pursue improved coastal access and amenities south of Cayucos, such as a bicycle and pedestrian path connection between Cayucos and the City of Morro Bay.

Impact PS-8: Need for Additional Park Acreage.

Buildout under the proposed Area Plan would result in a population of 1,837, in the Rural Estero, an increase of approximately 887 people. Land use in the Rural Estero consists of large recreational and agricultural parcels with a sparse settlement pattern. Therefore, the development of parks in this area is not considered under the proposed Area Plan. There is no measurable impact associated with the development of parks in this portion of the planning area.

f. Libraries

Special Policies, Programs, and Standards for the Proposed Area Plan
None specific to the Rural Estero.

Persons living in the Rural Estero are expected to use library facilities in adjacent areas. Therefore, no adverse impacts associated with the construction of library space are expected in the Rural Estero.

Cayucos

Special Policies, Programs, and Standards for the Proposed Area Plan

Policy IV.A.3: Support efforts to acquire and develop a new elementary school on an appropriate site as close as possible to the existing urban reserve line. In the event that an appropriate elementary school site is selected outside and in close proximity to the existing URL, the URL and urban services line should be extended to include that site, and the needed land use category change should be initiated.

Policy IV.H.1: Ensure that the type and design of proposed development is compatible with Cayucos Elementary School and adjacent land use categories.

Program III.C.2: Elementary School Site - Cayucos. Cayucos Elementary School District and the county should cooperate in evaluating and selecting and appropriate site for a new elementary school located as close as possible to the existing urban reserve line.

a. Schools.

Impact PS-9: Potential Increase in Student Enrollment Resulting in Unmet Demands for Schools.

Implementation of the proposed Area Plan would result in a total of 2,489 dwelling units at buildout in Cayucos, a potential increase of approximately 135 units. According to the proposed Estero Area Plan, buildout would add approximately 26 K-8 students and 14 high school students to Estero planning area schools assuming the existing occupancy rate is maintained in the future and the occupancy rate of new development is assumed to be 95%.

The additional K-8 students would exacerbate existing overcrowded conditions in the elementary school. Portable classrooms would accommodate the high school students. Under the assumption of 91 percent residential occupancy rate for existing development and a 95% occupancy rate for new development, buildout would add about 144 K-8 students and add approximately 77 high school students, a 62% and 36% increase over current enrollment, respectively. Section 65995 of the Government Code prohibits a local agency from either denying approval of a development project because of inadequate school facilities or imposing school impact mitigation measures other than designated fees. For residential developments, mitigation is limited to $2.14 per square foot of assessable space; for commercial or industrial developments, mitigation is limited to $0.34 per square foot of chargeable covered and enclosed space. By imposition of these fees, the impact is considered by law to be reduced to a less than significant level.

b. Fire Protection.

Impact PS-10: Potential Increase in Demand for Fire Protection from Local Fire Districts.

Impacts related to fire protection would be similar to those described under the "Area-wide Impacts" discussion above.

c. Police Protection.

Impact PS-11: Potential Increase in Demand for Police Protection from Local Law Enforcement Agencies.

Implementation of the proposed Area Plan would result in an increased population and demand for police protection services in the Cayucos area. Impacts are similar to those described under the "Area-wide Impacts" discussion above.

d. Solid Waste.

Impact PS-12: Potential Increase in Solid Waste Generation and Disposal at Existing Landfills.

Implementation of the proposed Area Plan would result in an increase in population and an increase of solid waste generation. Of the total 10,962 tpy of additional solid waste generated within the planning area, approximately 2,083 tpy, or nineteen percent would be generated within the Cayucos area. Impacts similar to those described under the "Area-wide Impacts" discussion will be reduced to be consistent with the County Source Reduction and Recycling Element, thus solid waste impacts will be less than significant, and no additional mitigation is necessary.

e. Parks

Special Policies, Programs, and Standards for the Proposed Area Plan

Policy IV.B.1: Develop additional neighborhood and community parks and recreational facilities to serve existing and future populations (for specific recommendations, see Section VI, Programs [following text])

Programs under F. County Park, Cayucos and Vicinity

1. Recreation Facility Design. The county should offer recreational programs and activities to serve all age groups, with particular emphasis placed on facilities and organized activities for senior citizens and school-aged youths.

2. Cayucos Parks. The County should provide a total of about 28 acres of neighborhood and community parkland in Cayucos. The following or equivalent sites should be considered in order to meet this objective:

   a. Cayucos Neighborhood Parks. The county should develop two neighborhood parks in Cayucos. At least one of those parks should be located on the east side of Highway 1, such as the proposed park site located adjacent to Highway 1, near the cemetery.

   b. Coastal Bluff Park and Coastal Access between Cayucos and Morro Bay. The county or other applicable agency should acquire and develop a park on the coastal bluff between Cayucos and Morro Bay, south of Studio Drive, and should acquire and improve coastal access between Cayucos and Morro Bay...

3. Joint Use of School Facilities. If a new school is developed, the county and the Cayucos Elementary School District should develop a joint powers agreement for public use of school facilities.

Policy IV.B.2: Develop and maintain accepted beach access ways for safe, public use.

Impact PS-13: Potential Need for Additional Park Acreage.

The Draft Plan identifies a shortage of park acreage in the Cayucos area of approximately 20 acres. Development of neighborhood parks and coastal access could have adverse effects on the environment. Additional population expected under the proposed plan may also have adverse effects on existing recreational facilities. However, development of any park facilities would require the review and approval of the county pursuant to CEQA, and would be subject to policies and standards proposed in the Estero Area Plan to protect sensitive resources. Impacts are therefore considered less than significant.

f. Libraries

Special Policies, Programs, and Standards for the Proposed Area Plan

Program III.E.1: Community Center - Cayucos. The county should create a master plan and explore ways to finance expansion and use of the Veterans Memorial Building for multiple purposes, such as recreation, public assembly, the arts, and a substantially expanded library.

Impact PS-14: Potential Need for Expanded Library Space.

The Draft Plan identifies a shortage of approximately 2,500 - 3,000 square feet of library space at buildout of the Cayucos area. In the program cited above, the Plan suggests locating the library in the existing Veterans Memorial Building. Locating the library in an existing facility would have minimal environmental impacts. Impacts are considered less than significant.

Los Osos

a. Schools.

Special Policies, Programs, and Standards for the Proposed Area Plan

Program III.C.1: **School Sites - Los Osos.** San Luis Coastal Unified School District and county should jointly study educational facility needs in Los Osos. A high school in Los Osos could accommodate the expected future increase in student population, and reduce traffic and air pollution caused by vehicle trips to Morro Bay High School. School sites should be acquired in a timely manner.

Impact PS-15: Potential Increase in Student Enrollment Resulting in Unmet Demands for Schools.

Implementation of the proposed Area Plan would result in approximately 8,033 dwelling units at buildout, an increase of approximately 1,780 units in the Los Osos area. According to the proposed Estero Area Plan, buildout would add approximately 240 elementary students, 115 middle school students, and 180 high-school students, assuming a residential occupancy rate of 100%. The elementary schools are not expected to exceed capacity at buildout, but the middle and high school would exceed capacity by between 10 and 15 percent. Section 65995 of the Government Code prohibits a local agency from either denying approval of a development project because of inadequate school facilities or imposing school impact mitigation measures other than designated fees. For residential developments, mitigation is limited to $2.14 per square foot of assessable space; for commercial or industrial developments, mitigation is limited to $0.34 per square foot of chargeable covered and enclosed space. By imposition of these fees, the impact is considered by law to be reduced to a less than significant level. Recommended Mitigation Measure PS-1 has been provided to further reduce any impacts.

b. Fire Protection.

Impact PS-16: Potential Increase in Demand for Fire Protection from Local Fire Districts.

Impacts related to fire protection would be similar to those described under the "Area-wide Impacts" discussion above.

c. Police Protection.

Impact PS-17: Potential Increase in Demand for Police Protection from Local Law Enforcement Agencies.

Implementation of the proposed Area Plan would result in an increased population and demand for police protection services. Impacts are similar to those described under the "Area-wide Impacts" discussion above.

d. Solid Waste.

Impact PS-18: Potential Increase in Solid Waste Generation and Disposal at Existing Landfills.

Implementation of the proposed Area Plan would result in an increase in population and an increase of solid waste generation. Of the total 10,962 tpy of additional solid waste generated within the planning area, approximately 8,112 tpy, or seventy-four percent would be generated within the Los Osos area. Impacts similar to those described under the "Area-wide Impacts" discussion will be reduced to be consistent with the County Source

Reduction and Recycling Element, thus solid waste impacts will be less than significant, and no additional mitigation is necessary.

e. Parks

Special Policies, Programs, and Standards for the Proposed Area Plan

Policy IV.C.1: Develop a total of at least 118 acres of neighborhood and community parks and recreation facilities in order to serve the projected future population.

Programs under G. County Parks, Los Osos and Vicinity

1. Los Osos Parks. The County should provide a total of about 118 acres of neighborhood and community parkland in Los Osos. The following or equivalent sites should be considered in order to meet this goal:

    a. Boat Launch and Park in the Back Bay.
    b. Los Osos Community Park and Sports Complex.
    c. Skyline Drive Community Park
    d. Los Osos Aquatic Center
    e. Community Off-Leash Dog Park
    f. Baywood Park Area Neighborhood/Community Park(s)
    g. Baywood Park Area "Pocket Parks"

2. Multiple Use of Drainage Basins.
3. Joint Use of School Facilities.
4. Los Osos Recreation Program

Impact PS-19: Need for Expanded Recreational Space.

The Draft Area Plan recommends 118 acres of recreational acreage in the Los Osos area. This is in addition to a number of public accessways and other coastal access improvements. Considering the relative wealth of sensitive resources in this area, development of such facilities may have a significant effect on the environment. Furthermore, additional population expected under the Area Plan may adversely impact existing recreational facilities. Specific proposals for park space will be subject to review under CEQA by the County prior to development and would also be subject to policies and standards in the proposed plan which protect biological resources. Impacts are therefore considered less than significant. Impacts to biological resources and other resources are addressed elsewhere in the EIR.

f. Libraries

Special Policies, Programs, and Standards for the Proposed Area Plan
None specific to the Los Osos Area. Note: A 7,000 square-foot library is currently proposed in the location of the existing library.

Impact PS-20: Need for Expanded Library Space.

An expansion of the Los Osos Library is currently proposed and is proceeding through design and permitting. Impacts associated with construction of the expansion are minimal, except for potential impact to sensitive species known to occur in the vicinity, most notably, the Morro shoulderband snail. The Los Osos Library will be part of the Section 7 consultation with the Fish and Wildlife Service under the Federal Endangered Species Act being undertaken for the Los Osos Sewer Project. Consultation will ensure minimization of impact to the species.

Impacts are considered mitigated to the extent feasible by consultation with the Fish and Wildlife Service. Cumulative impacts of proposed development on biological resources are addressed in Section 5.8 of this EIR.

5.7.3.4 Mitigation Measures

PS-1: By 2016, the County shall evaluate the need for an additional fire station in the Estero Area.

PS-2: Add the following policy: "Monitor parks for degradation of natural resources, facilities, and other features throughout the implementation of the Estero Area Plan."

5.7.4 Cumulative Impacts

a. Schools.
One of the school districts that serves portions of the Estero planning area also serve portions of other planning areas within the county. The SLCUSD also serves Morro Bay and points in between Morro Bay and San Luis Obispo. Consequently, population and housing growth that occurs in those areas would add to the cumulative impact to schools in the Estero planning area.

As with project-generated student population increases, cumulative increases would create the need for more school facilities. Measure A funds, in combination with developer fees, would be expected to provide adequate funds for any needed new facilities in the SLCUSD.

b. Fire Protection.
The CDF/County Fire Department serves areas outside the boundaries of the Estero planning area. As such, population growth that occurs both within the planning area and in the remainder of the CDF jurisdiction will cumulatively impact the provision of fire protection service.

c. Police Protection.
Both the County Sheriff's Department and the CHP serve areas outside the boundaries of the Estero planning area. Consequently, population growth that occurs both within the Estero planning area and throughout the County will cumulatively impact the provision of police protection service.

d. Solid Waste.
Development throughout the area served by Cold Canyon Landfill will cumulatively increase solid waste disposal. However, planned waste diversion techniques would provide sufficient landfill capacity for anticipated cumulative growth in the County until 2017. Cumulative impacts to the local solid waste disposal system are, therefore, considered less than significant.

e. Parks
Development throughout the area will increase the need for parks, the construction of which may have a significant impact. Impacts associated with construction, such as drainage, and biological resources are discussed in topic-specific sections of this EIR. Increased population within the planning area may increase pressure on existing parks, leading to their degradation. Cumulative impacts are considered significant, but mitigable.

f. Libraries
Development throughout the Estero Area will increase demand for library space. Impacts associated with the development of library space vary between communities; in Cayucos, the provision of a library will not have significant effects on the environment, while in Los Osos, impacts may be significant due to impacts to endangered species. Impacts associated with development under the Estero Area Plan are discussed in topic-specific sections of this EIR.

5.7.5 Residual Impacts

a. Schools.
Statutory fees for residential and commercial development to provide for construction or reconstruction of school facilities are considered by law to be full mitigation (Govt. Code §65995). Therefore, no residual impacts would occur.

b. Fire Protection.
Potential impacts associated with buildout under the proposed Area Plan would be reduced because the enforcement of Uniform Fire Codes, Uniform Building Codes, California Health and Safety Codes, and other fire prevention and suppression regulations. Impacts are considered less than significant.

c. Police Protection.
Plan buildout would increase the demand for police protection service in the planning area. However, substantial physical expansions are not considered likely. Impacts are therefore considered less than significant.

d. Solid Waste.
Available landfill capacity, in conjunction with currently planned waste diversion techniques, would be adequate to accommodate waste generated by Area Planning update buildout. Impacts would be less than significant without additional mitigation.

e. Parks
The construction of parks in the Estero Area may result in project-specific significant environmental effects, depending on location. Impacts associated with development are discussed in topic-specific sections in this EIR. Population buildout under the Area Plan may also increase pressure on existing recreational facilities. Impacts are considered less than significant due to mitigation included in the project.

f. Libraries
Library expansions proposed under the Estero Area Plan and currently in the planning process may have significant impacts. Impacts associated with development are discussed in topic-specific sections of this EIR.

5.8 Biological Resources

Biological resources of the Estero planning area were evaluated based on site investigations and reviews of literature, including the California Department of Fish and Game (DFG) Natural Diversity Database and EIRs produced for various projects within the planning area. Within each section of this biological assessment, the characterization of resources of the Estero planning area apply to the Other Watershed and Cayucos Fringe study areas as well.

5.8.1 Setting

The Estero planning area contains a wealth of biological resources. While this section discusses these resources in detail, and individually, it is important that they also be recognized as a whole ecosystem, with several subsystems. A healthy system is diverse, unstressed and contains enough redundancy to withstand changes brought naturally or by development. Three important concepts, including biodiversity, healthy ecosystems and the carrying capacity of the land, have been considered in this analysis.

Ecosystem: Ecology is the science of the relationships between organisms and their environment. An ecosystem includes both the organisms and their requisite environment.

Biodiversity: Species do not live in a vacuum. They exist in a "community" and are dependent upon the many elements of the community. Biodiversity is recognition of the interdependence of species, and the need to protect larger ecosystems and the variety and abundance of life within them, in order to protect the individuals.

Carrying Capacity: This concept is used in wildlife management as a standard for measuring the impact of land use and development on the environment. Ecosystems have a limited capacity for development. The more development is designed to work within the system (natural landscaping, appropriate drainage, etc) the greater the system's carrying capacity.

5.8.1.1 Area-Wide Biological Resources

a. Vegetation

The Estero planning area occupies approximately 71.5 square miles and supports a variety of major plant communities including marine intertidal, estuarine, coastal salt marsh, freshwater marsh, riparian scrub and woodland, coastal foredune, central dune scrub, central coastal scrub, maritime chaparral, coast live oak woodland, annual grassland, eucalyptus woodland and ruderal (disturbed) vegetation. The assessment of plant communities occurring within the planning area was based on limited field surveys and review of aerial photographs. Figure 5.8-1 displays the location and extent of major plant communities occurring within the Estero planning area and secondary study areas (Cayucos Fringe and Other Watershed).

1. ***Marine Intertidal.*** Marine intertidal communities consist of various aquatic plant species occurring in the nearshore marine environment. Aquatic plants within these communities are adapted to alternating exposure to air and inundation by seawater. Most marine aquatic vegetation is established on rocky substrate in areas influenced by marine tidal action. Rocky sea bottoms occupy a small portion of the entire coastline adjacent to the Estero planning area. Intertidal plant communities within these areas consist of a mixture of algae and marine angiosperms (flowering plants). The only angiosperms in the nearshore marine aquatic community occurring within the planning area are species of the genus *Phyllospadix* (seagrasses). Common species of algae occurring within the marine intertidal area include iridescent seaweed (*Iridaea* spp.) and Turkish towel (*Mastocarpus* sp.). Larger species of algae, such as giant kelp (*Macrocystis* sp.) and bull kelp (*Nereocystis* sp.), grow in large underwater forests along California's coastline. These "kelp forests", which

occur in deeper waters adjacent to intertidal communities, are particularly extensive along the northern San Luis Obispo County coastline and in areas adjacent to the southern portion of the Estero planning area.

2. ***Estuarine***. Estuarine communities occur where freshwater from streams mixes with water from the marine environment in a protected embayment. In the Estero planning area estuarine communities are particularly abundant within Morro Bay. Large variations in salinity and water levels occur within the estuarine environment, primarily due to the indirect influence of the tides and seasonal changes in freshwater runoff from streams. Aquatic plants existing in the estuarine environment are generally inundated for prolonged periods, yielding plant species that are generally soft-bodied and somewhat flexible. Eelgrass (*Zostera marina*) is a common aquatic flowering plant species that occurs in estuarine environments and is adapted to constant inundation. This species is abundant within Morro Bay and is established on substrate consisting of deposited silt. Algal species, which occur as part of estuarine communities in the Estero planning area, include *Ulva* sp. and *Cladophora* sp.

3. ***Coastal Salt Marsh***. Coastal Salt Marsh communities typically occur adjacent to the shallow waters occupied by the estuarine environment and function as an interface between marine and freshwater environments. These communities exhibit similar characteristics to those of estuarine communities, however, plants occurring within the coastal salt marsh are adapted to the stresses of variation in salinity, periodic inundation and extreme fluctuations in temperature. In the Estero planning area, coastal salt marsh communities are extensive and occur at the mouths of small coastal streams such as Chorro and Osos Creeks. Common plant species occurring as part of coastal salt marsh communities within the Estero planning area include saltgrass (*Distichlis spicata*), pickleweeds (*Salicornia* spp.) fleshy jaumea (*Jaumea carnosa*), giant rush (*Juncus* sp.) and coastal silverweed (*Potentilla egedii*).

4. ***Freshwater Marsh***. Freshwater Marsh communities occur in slow moving, shallow freshwater streams and lakes and are typified by areas containing nutrient rich mineral soil consistently saturated throughout the growing season. These communities are often found inland and adjacent to coastal saltmarsh communities. In the Estero planning area, freshwater marshes typically occur as transitional areas between coastal salt marsh communities and riparian areas. These communities also occur in isolated areas where the water table is at or near the ground surface, and are often referred to as "freshwater seeps". Freshwater marsh communities occupy a very small portion of the total planning area, and vegetation occurring as part of these communities are adapted to harsh environmental conditions, including prolonged soil saturation. Typical plant species occurring as part of these communities in the planning area include sedges (*Carex* spp.), rushes (*Juncus* spp.) bulrushes (*Scirpus* spp.), cattails (*Typha* spp.), arrowleaves (*Sagittaria* spp.), bur-reeds (*Sparganium* spp.), watercress (*Nasturtium officinale*) and docks (*Rumex* spp.).

5. ***Riparian Scrub/Riparian Woodland***. Riparian Scrub/Riparian Woodland communities are characterized as sparse to dense corridors of vegetation occurring adjacent to streams and rivers or in areas with a high ground water table. These communities are extensive in the Estero planning area and occur as corridors bordering coastal streams such as Morro, Toro, Chorro and Osos Creeks, and their tributaries. The structure of riparian communities within the planning area is variable and alternates between dense tree thickets (riparian woodland) and open, shrub dominated areas (riparian scrub). In addition, species composition often varies along the course of each coastal stream in conjunction with changes in topography. The extent of the vegetation in riparian communities within the planning area is highly dependent upon factors such as seasonal changes in flow rate, the size and nature of the streambank and by historical patterns of land use. Riparian scrub communities generally occur along perennial and intermittent streams and are typically dominated by willows (*Salix* spp.) and other various shrubs. Species like poison hemlock (*Conium maculatum*), wild blackberry (*Rubus ursinus*), twinberry (*Lonicera involucrata*), and sting nettle (*Urtica holosericea*) often comprise riparian scrub understory. Riparian woodland communities within the planning area are dominated by black cottonwood (*Populus trichocarpa*) and sycamore (*Platanus racemosa*). Understory species occurring within these communities include white alder (*Alnus rhombifolia*), California bay (*Umbellularia californica*), creek dogwood (*Cornus stolonifera*), wild rose (*Rosa californica*) and black nightshade (*Solanum douglasii*).

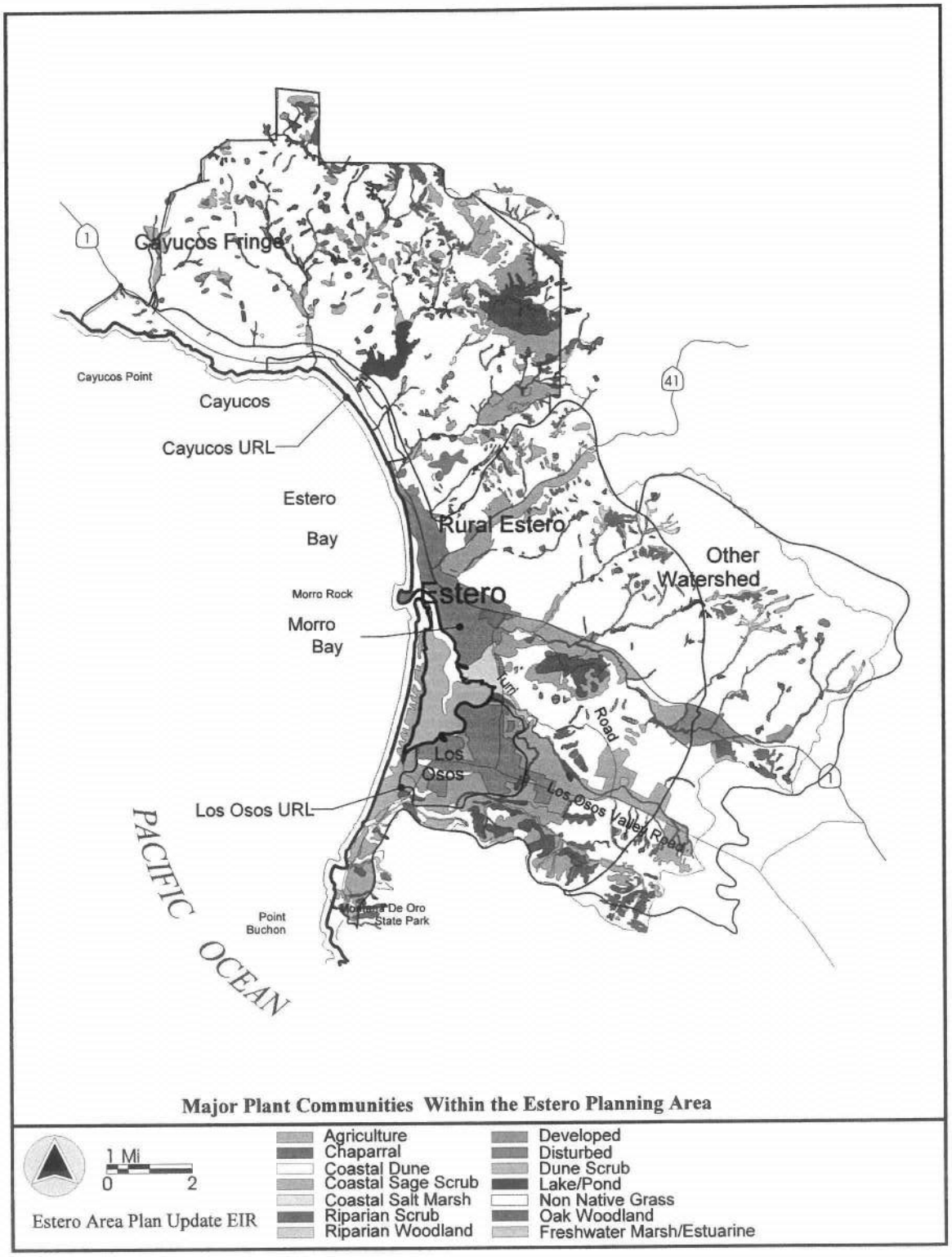


Figure 5.8-1. Major Plant Communities in the Estero Planning Area.

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6. *Coastal Foredune*. Coastal foredune communities usually occur adjacent to open sandy beaches and barren active dunes near the coast. These communities often integrate with dune scrub communities on more stabilized dunes away from the coast and in areas with well established dune hummocks (Holland, 1986). Because of the harsh environmental conditions present, coastal strand communities usually contain low species diversity. Plants occurring in these areas are tolerant of repeated burial by shifting sands and leaves of the members of these communities are usually small and somewhat succulent. Coverage within these areas varies from nearly complete to scattered. Native species which occur as part of coastal strand communities in the Estero planning area include, yellow sand verbena (*Abronia latifolia*), yarrow (*Achillea borealis*), beach bur (*Ambrosia chamissonis*), coastal goldenbush (*Isocoma menziesii* var. *vernonoides*), and beach primrose (*Camissonia cheiranthifolia)* dune morning glory (*Calystegia soldanella*), and beach rye-grass (*Leymus mollis*). Several introduced species, such as sea rocket (*Cakile maritima*) and ice plant (*Carpobrotus spp*), also occur in association with coastal strand communities within the Estero planning area.

7. Central Dune Scrub. Central dune scrub communities are generally located inland from coastal foredune communities and open sandy beaches. They are primarily established on recent to ancient coastal sand dunes. Away from the coast, these communities typically integrate with chaparral, coast live oak woodland or coastal sage scrub communities. Because central dune scrub communities are usually located in the wind shadow of active dune areas and they contain more vegetative cover, the soils tend to be considerably more stable than those of foredune areas. Species composition is highly variable within these communities, but generally contain high species diversity. Characteristic species include a variety of semi-woody shrubs such as mock heather (*Ericameria ericoides*), sand almond (*Prunus fasciculata* var. *punctata*), dune buckwheat (*Eriogonum parvifolium*), coastal silver lupine (*Lupinus chamissonis*), black sage (*Salvia mellifera*), and California sagebrush (*Artemisia californica*). Understory of central dune scrub communities is typically sparse and primarily comprised of various forbs and lichens. Characteristic understory species known from the project area include California croton (*Croton californicus*) and wedgeleaf horkelia (*Horkelia cuneata* ssp. *cuneata*). In some locations within the project area, the invasive and non-native veldt grass (*Ehrharta calycina*) comprises a significant portion of the understory of central dune scrub.

8. Central (Lucian) Sage Scrub. Central sage scrub communities are found along the California coast south of the San Francisco Bay area (Holland, 1986). Most often, these communities occur in pockets in the outer and inner southern Coast Ranges and in scattered areas along the immediate coast. In the Estero planning area, coastal scrub communities are found at low elevations on the coast and along steep slopes with shallow soil. Coastal scrub communities are extensive throughout the Estero planning area and typically are found integrating with dune scrub or maritime chaparral communities. Species composition is highly variable in coastal scrub areas and is generally dependent upon topography, soils and slope aspect. Plants occurring in coastal scrub communities are characterized as being aromatic, low growing and drought tolerant. Common plant species include California sagebrush, coyote brush (*Baccharis pilularis*), monkeyflower (*Mimulus* spp.), poison oak (*Toxicodendron diversilobum*), California buckwheat (*Eriogonum fasciculatum*) and black sage (*Salvia mellifera*). Understory within coastal scrub communities is generally sparse and includes forbs such as plantain (*Plantago* sp.) and yarrow (*Achillea* sp.).

9. *Central Maritime Chaparral.* Central maritime chaparral communities occur in windswept areas of central and northern California. In San Luis Obispo County, they are most often established on well-drained, sandy substrates within the zone of summer fog incursion (Holland, 1986). Maritime chaparral is limited in its distribution within the Estero planning area and is found to form a mosaic with central dune scrub, coastal scrub, and coast live oak communities. Stiff, woody shrubs such as Arctostaphylos spp. and Ceanothus spp dominate maritime chaparral communities. Other species frequently occurring as part of this community include toyon (*Heteromeles arbutifolia*), coffeeberry (*Rhamnus californica*), black sage, chamise (*Adenostoma fasciculatum*), and poison oak. Occasionally, in areas exposed to strong coastal winds, coast live oak (*Quercus agrifolia*) will also form a part of the community.

10. *Coast Live Oak Woodland.* Oak woodland communities are extensive throughout the Estero planning area and are dominated by coast live oak, which usually occurs in pure stands. Coast live oak woodlands within the planning area do not form a continuous belt, but rather, occur as a mosaic closely associated with communities such as coastal scrub and non-native grassland. Typical understory plant species occurring in areas where coast live oaks form dense canopies include, toyon, poison oak, bracken fern (*Pteridium aquilinum*), miner's lettuce (*Claytonia perfoliata*), bedstraw (*Galium apartine*), and coffeeberry. In drier areas, where oaks are scattered, coast live oak woodland often integrates into other plant communities, such as chaparral and grassland, and the understory becomes highly variable.

11. *Annual Grassland.* Annual grassland communities occur in the interior valleys of the Coast Ranges of California and along the central and southern California coastal areas. The majority of grasslands throughout California, as in the Estero planning area, are dominated by non-native grasses that were accidentally introduced from the Mediterranean region during the Spanish Colonization period. Grassland communities are extensive throughout the Estero planning area. However, the structure of the grass community varies according to current land use practices. Non-native grasses, native wildflowers and weedy annual forbs (broadleaf plants) dominate grassland areas of the planning area. In addition, a few native species of grass may potentially occur infrequently as part of the non- native grassland association in the area. Typical non-native grass species occurring in the planning area include wild oat (*Avena* sp.), soft chess (*Bromus mollis*), red brome (*Bromus rubens*), Italian rye grass (*Lolium multiflorum*) and annual fescues (*Vulpia* spp.). Typical forbs associated with grassland communities in the planning area include native wildflowers such as California poppy (*Eschscholzia californica*), goldfields (*Lasthenia californica*), lupine (*Lupinus* sp.), owl's clover (*Orthocarpus densiflorus*), popcorn flower (*Plagiobothrys* spp.), blue-eyed grass (*Sisyrinchium bellum*) and clarkia (*Clarkia* sp.). Non-native forbs include wild mustard (*Brassica* spp.), redstem filaree (*Erodium cicutarium*), long-beak filaree (*E. botrys*), and burclover (*Medicago hispida*). Native species of grass, which may occur in scattered locations throughout the planning area, include purple needlegrass (*Stipa pulchra*) and slender needlegrass (*Stipa lepida*).

12. *Eucalyptus Woodland.* Eucalyptus woodland is typically represented by dense stands of gum trees (*Eucalyptus* spp.). Plants in this genus, imported primarily from Australia, were originally planted in groves throughout many areas of coastal California as a potential source of lumber, for their use as windbreaks, and for their horticultural novelty. In areas where eucalyptus forms dense stands, growth of native plants within the immediate vicinity is usually completely inhibited, thereby altering community structure and dynamics.

13. *Ruderal (Disturbed habitat).* Ruderal vegetation has been significantly disturbed by agriculture, construction, or other land clearing activities. Disturbed habitat occurs throughout the Estero planning area in vacant lots, abandoned fields, roadsides, agricultural fields, greenbelts, parks, golf courses, and development areas. The primary difference between non-native grasslands and ruderal habitats are that the soil is often disturbed in ruderal habitats, which also lack the native wildflowers found in the grasslands. Characteristic uncultivated species recorded in disturbed habitats include non-native species such as wild mustard, wild radish (*Raphanus sativus*), Russian thistle (*Salsola iberica*), castor bean (*Ricinus communis*), wild oat, soft chess, red brome, ripgut grass (*Bromus diandrus*), sweet fennel (*Foeniculum vulgare*), Bermuda grass (*Cynodon dactylon*), and red stem filaree. The only native species common in ruderal habitats of the planning area is coyote brush.

b. Wildlife

A variety of habitat types important to wildlife occur within the Estero planning area. Each vegetative community supports assemblages of animal species. However, some communities are more critical than others for providing important habitat features. Typical wildlife species that may inhabit or frequent the planning area are described below, along with associated preferred habitat areas for various indicated species.

1. Fish. Native fish species which may potentially occur in streams within the Estero planning area include the partially-armored threespine stickleback (*Gasterosteus aculeatus microcephalus*), speckled dace (*Rhinichthys osculus*), and prickly sculpin (*Cottus asper*). The non-native mosquitofish (*Gambusia affinis*), is commonly found

in association with these native freshwater species. Resident species of rainbow trout (*Oncorhynchus mykiss*) may also be present in the upper reaches of perennial streams in the planning area. Migratory steelhead trout (*Oncorhynchus mykiss*) are known to occur seasonally in coastal streams such as Chorro and Toro Creeks. In addition, marine species such as staghorn sculpin (*Leptocottus armatus*) will often enter coastal lagoons and estuarine habitats to feed and/or reproduce during the winter and spring when sand bars at the mouths of the streams have been breached. Marine and estuarine species which may occur in Morro Bay estuary near the mouths of Chorro and Osos Creeks include starry flounder (*Platichthys stellatus*), striped mullet (*Mugil cephalus*), staghorn sculpin, arrow goby (*Clevelandia ios*), Pacific herring (*Clupea harengus*), tidewater goby (*Eucyclogobius newberryi*) and topsmelt (*Atherinops affinis*).

2. ***Amphibians.*** Various amphibian species potentially utilize coastal streams and adjoining riparian corridors within the Estero planning area. The more common of these amphibians include native species such as Pacific chorus frog (*Psuedacris regilla*), western toad (*Bufo boreas*), ensatina (*Ensatina eschscholtzii*), newts (*Taricha* spp.), as well as the non-native bullfrog (*Rana catesbiana*). Other less-common amphibians that are known from the planning area include tiger salamander (*Ambystoma tigrinum*) and California red-legged frog (*Rana aurora draytoni*). Some of the amphibians that occur within the Estero planning area will utilize adjoining protected upland areas where sufficient moisture is present.

3. ***Reptiles.*** Reptiles occur in nearly all habitats within the Estero planning area. Species which are expected to be present include, but are not limited to, western skink (*Eumeces skiltonianus*), southern alligator lizard (*Gerrhonotus multicarinatus*), western fence lizard (*Sceloporus occidentalis*), gopher snake (*Pituophis melanoleucus*), common kingsnake (*Lampropeltis getulus*), California horned lizard (*Phrynosoma coronatum*), common garter snake (*Thamnophis sirtalis*), striped garter snake (*Thamnophis couchii*), western rattlesnake (*Crotalus viridus*), and southwestern pond turtle (*Clemmys marmorata pallida*).

4. ***Mammals.*** The assorted habitats of the Estero planning area support a variety of mammals including Virginia opossum (*Didelphis virginiana*), black-tailed jack rabbit (*Lepus californica*), Audubon's cottontail (*Sylvilagus audubonii*), Botta's pocket gopher (*Thomomys bottae*), western gray squirrel (*Sciurus griseus*), California ground squirrel (*Citellus beecheyi*), coyote (*Canis latrans*), raccoon (*Procyon lotor*), gray fox (*Urocyon cinereoargenteus*), bobcat (*Lynx rufus*), mountain lion (*Felis concolor*), striped and Western spotted skunk (*Mephitis mephitis, Spilogale gracilis*), badger (*Taxidea taxus*), black-tailed deer (*Odocoileus hemionus*), long-tailed weasel (*Mustela frenata*), ringtail (*Bassaricus astutus*) and several species of rodents and bats. Marine mammals, such as the Southern sea otter (*Enhydra lutris*), California sea lion (*Zalophus californianus*), and harbor seal (*Phoca vitulina*) utilize marine intertidal and estuarine habitats for feeding, and haul-out along rocky shore areas to rest.

5. ***Birds.*** Birds are found in every habitat throughout the Estero planning area. Common bird species occurring within the planning area are identified below using standard nomenclature. Typical species that utilize open grassland areas and fields include red-tailed hawk, red-shouldered hawk, American kestrel, Cooper's hawk, white-shouldered kite, western meadowlark, Say's phoebe, and western bluebird. Riparian habitats support Anna's hummingbird, northern flicker, scrub jay, bushtit, black phoebe, belted kingfisher, black-crowned night heron and white-breasted nuthatch. Woodlands and coastal scrub areas provide resources for California quail, acorn woodpecker, brown towhee, and dark-eyed junco. Wading birds such as the snowy and great egret, and great blue heron frequent and utilize coastal saltmarsh and freshwater marsh habitats for feeding. Migratory shorebirds, including snowy plovers, avocets, sandpipers, and marbled godwits, occur in and utilize open sandy beach areas and estuarine habitats in the planning area. Telephone poles and tall trees provide roosting and hunting perches for raptors including red- tailed and red-shouldered hawks. Windrow trees, such as eucalyptus, often provide suitable nesting sites for birds of prey such as the great horned owl and barn owl.

6. ***Insects.*** Insects occur in all habitats within the Estero planning area. They are considered valuable food sources for a variety of wildlife and often function as indicators as to the overall health of various habitats, particularly of aquatic habitats. The variety of insect species occurring within the planning area is extensive

and representatives from all insect orders are expected to occur.

c. Sensitive Species and Important Biological Resource Areas

Several sensitive habitats types, plant taxa, and animal taxa have been recently or historically known to occur in the Estero planning area. The California Natural Diversity Data Base (CNDDB) is a computerized inventory of California's sensitive plants, animals, and natural plant communities. The term "sensitive species" is used throughout this section and includes plants and animals that are officially listed by a regulatory organization or agency as well as those considered to be of local concern or interest by recognized monitoring agencies such as California Native Plant Society (CNPS), CDFG or Audubon Society. Five sensitive habitat areas, twenty-four sensitive plant species, and twenty-nine sensitive animal species were identified by the CNDDB and other sources for the Estero planning area (Tables 5.8-1 and 5.8-2).

Fieldwork was not conducted as part of this analysis to confirm or deny the presence of these or other sensitive species. Specific studies, including those conducted by the United States Fish and Wildlife Service (USFWS, 1997), CMCA (2000, 2002), and mapping conducted by Jones & Stokes (1997) and CMCA (2002) have verified the presence of some sensitive species, mostly near the Los Osos area. It is important to note that additional, previously unidentified species or habitats could also occur within the planning area. Site specific surveys for any potentially sensitive species would be necessary to confirm their presence within a particular area proposed for development. The following discussion is intended to provide a general understanding of sensitive species in the Estero planning area.

1. Habitat. Several sensitive habitat areas have been identified by the CNDDB as occurring within the Estero planning area. These sensitive habitat areas consist of plant communities that are limited in extent and are documented as occurring in specific locations within the planning area. These communities exhibit unique characteristics and usually occur as smaller components of major plant communities discussed previously in Section 5.8.1.1.

Central dune scrub communities have been documented by the CNDDB as occurring on the sand spit within Morro Bay State Park and in Montana de Oro State Park within the dune area located north of Hazard Creek. These sensitive communities are restricted to areas along the coast and are generally found in stabilized areas within the wind shadow of active dunes. Numerous native plant species occur as part of this sensitive community with various shrubs dominating. Characteristic species occurring in central dune scrub communities within the Estero planning area include coastal silver lupine (*Lupinus chamissonis*), mock-heather and coastal golden yarrow (*Eriophyllum staechadifolium*).

The CNDDB lists central maritime chaparral as a sensitive habitat and documents the occurrence of this community in several locations throughout the Estero planning area. These communities are identified as occurring within Montana de Oro State Park in areas adjacent to Hazard Canyon, and along the southern portions of Cerro Cabrillo and Hollister Peak. Central maritime chaparral communities generally occur in areas exposed directly to coastal winds and are established primarily on well-drained soils. Various plant species occurring as part of these communities within the Estero planning area include Morro manzanita (*Arctostaphylos morroensis*), Arroyo de la Cruz manzanita (*A. cruzensis*) and chamise.

Table 5.8-1 Estero Planning Area Sensitive Plant Taxa

Species	Status		
	California	Federal	CNPS
Arctostaphylos cruzensis Arroyo de la Cruz manzanita	---	SSC	1B
Arctostaphylos osoensis Osos manzanita	---	FT	1B
Arctostaphylos morroensis Morro manzanita	---	SSC	1B
Arctostaphylos tomentosa daciticola Dacite manzanita	---	SSC	1B
Calochortus clavatus clavatus Club-haired mariposa lily	---	---	List 4
Calochortus obispoensis San Luis mariposa lily	---	---	1B
Carex obispoensis San Luis Obispo sedge	---	---	1B
Chorizanthe breweri Brewer's spineflower	---	---	1B
Cirsium fontinale var. *obispoense* Chorro Creek bog thistle	SE	FE	1B
Cordylanthus maritimus maritimus Salt marsh bird's beak	SE	FE	1B
Dithyrea maritima Beach spectaclepod	ST	SSC	1B
Dudleya abramsii bettinae San Luis serpentine dudleya	---	SSC	1B
Dudleya blochmaniae blochmaniae Blochman's dudleya	---	SSC	1B
Erigeron blochmaniae Blochman's leafy daisy	---	---	1B
Eriodictyon altissimum Indian Knob mountainbalm	SE	FE	1B
Fritillaria viridea San Benito Fritillary	---	SSC	List 4
Juncus acutus sphaerocarpus Spiny rush	---	---	List 4
Lastenia glabrata ssp. *coulteri* Coulter's goldfields	---	SSC	1B

Species	Status		
	California	Federal	CNPS
Layia jonesii Jones' layia	---	SSC	1B
Prunus fasciculata var. *punctata* Sand almond	---	---	List 4
Sanicula maritima Adobe sanicle	SR	SSC	1B
Suaeda californica California sea blite	---	SSC	1B
Sidalcea hickmanii anomala Cuesta Pass checkerbloom	SR	SSC	1B
Sulcaria isidiifera Splitting yarn lichen	---	SSC	---
Sensitive Communities			
Central Dune Scrub Central Maritime Chaparral Valley Needlegrass Grassland Northern Coastal Salt Marsh Coastal Brackish Marsh	These habitats are considered sensitive by the DFG		

Sources: California Natural Diversity Data Base (CNDDB), 2003; California Native Plant Society, (2001), *Inventory of Rare and Endangered Vascular Plants of California.* Sixth Edition; California Department of Fish and Game, Natural Heritage Division, (2003).

Species of Concern

Codes:
Federal
SSC = Federal Specie of Concern - Former Federal candidate species.
FPE = Proposed for federal listing as endangered.
FE = Federally listed as endangered.
FT = Federally listed as threatened.
State
SR = Listed by the State of California as rare.
SE = Listed by the State of California as endangered.
ST = Listed by the State of California as threatened.
SCE = Candidate for State of California listing as endangered.

California Native Plant Society
1B = Plants rare, threatened, or endangered in California and elsewhere.
List 4 = Plants of limited distribution. A watch list.

Notes:
1. Plant communities considered rare in California by DFG (Holland, R.F., 1986).

Table 5.8-2 Estero Planning Area Sensitive Animal Taxa

Species	Status		
Common Name	**California**	**Federal**	**CNPS/Other**
BIRDS			
Ardea herodias (rookery) Great blue heron	*	—	Aud, LC; CDF
Casmerodius albus (rookery) Great egret		—	CDF
Egretta thula (rookery) Snowy egret	*	—	—
Charadrius alexandrinus nivosus Western snowy plover	CSC	FT	Aud. SC
Nycticorax nycticorax (rookery) Black-crowned night heron	*	—	Aud. LC
Laterallus jamaicensis coturniculus California black rail	ST	SSC	DFG
Rallus longirostris obsoletus California clapper rail	SE	FE	DFG
Pelecanus occidentalis californicus California brown pelican	SE	FE	DFG
Buteo regalis Ferruginous hawk	CSC	SSC	Aud.SC
Accipiter cooperii (nesting) Cooper's hawk	CSC	—	Aud. BL
Circus cyaneus Northern harrier	CSC	—	Aud. BL
Falco peregrinus anatum American peregrine falcon	SE	FE	DFG
Elanus leucurus White-tailed kite	—	—	DFG
Lanius ludovicianus Loggerhead shrike	CSC	SSC	Aud. BL
Speotyto cunicularia Burrowing owl	CSC	SSC	Aud. SC
REPTILES			
Anniella pulchra nigra Black legless lizard	CSC	FPE	DFG
Clemmys marmorata pallida Southwestern pond turtle	CSC	SSC	DFG
Thamnophis hammondii Two-striped garter snake	*	SSC	*
AMPHIBIANS			
Rana aurora draytonii California red-legged frog	CSC	FT	*
Ambystoma californiense California tiger salamander	CSC	FC	CSC

Species	Status		
Common Name	**California**	**Federal**	**CNPS/Other**
MAMMALS			
Dipodomys heermanni morroensis Morro Bay kangaroo rat	SE	FE	ST
Taxidea taxus American badger	CSC	—	SE
Enhydra lutris nereis Southern sea otter	—	FT	SE
FISH			
Eucyclogobius newberryi Tidewater goby	CSC	FE	CSC
Oncorhynchus mykiss Southern steelhead (Central Coast ESU)	CSC	FT	CSC
INVERTEBRATES			
Helminthoglypta walkeriana Morro Shoulderband snail	—	FE	—
Tryonia imitator California brackish water snail	—	SSC	CSC
Danaus plexippus Monarch butterfly	*	—	CSC

Sources: California Natural Diversity DataBase (CNDDB), 2003.
California Department of Fish and Game (2003), Species of Concern

Codes:

SSC = Federal Special Concern Species

FC= Federal candidate species (former Category 1 candidate)

FE = Federal Endangered

FT = Federal Threatened

FPE = Proposed for listing as endangered

CSC = State Species of Special Concern

SE = State Endangered

ST = State Threatened

* = Species that are biologically rare, restricted in distribution, declining throughout their range, or are closely associated with a habitat that is declining in California.

Aud. BL = Audubon Blue List species.

Aud. SC = Audubon Special Concern species

Aud. LC = Audubon Local Concern species

CDF = Designated "sensitive species" by the California Department of Forestry and Fire Protection.

DFG = Species classified as fully protected by the DFG

Valley needlegrass grassland communities are listed as sensitive by the CNDDB and are documented as occurring at three locations within the planning area. These communities, comprised of various species of native grasses and forbs, are located in limited areas within Montana de Oro State Park between Islay and Coon Creeks and Islay Creek and Los Osos Creek drainages. In addition, valley needlegrass grassland has been identified as occurring in an area located northeast of Valencia Peak.

The CNDDB documents one northern coastal salt marsh community as occurring within the Estero planning area. This highly productive community occurs within the Morro Bay estuary and is most prevalent in the northeastern portion near the mouth of Chorro Creek and at the southern portion of the bay near Shark's Inlet. The dominant plant species occurring within this community is pickleweed. Coastal brackish marsh communities occur within the Morro Bay Estuary at the mouths of Chorro and Los Osos Creeks. These communities occur adjacent to coastal salt marsh communities in areas of brackish water where salinity fluctuates significantly. Characteristic plant species of these communities include cattails, saltgrass, sedge, bulrush, and pickleweed.

Coastal and valley freshwater marsh communities are documented by the CNDDB in locations east of the community of Los Osos, along the fringe of Warden Lake. These communities typically occur in areas of standing, shallow fresh water and are established in nutrient-rich soils. Dominant plant species within the coastal and valley freshwater marsh community located at Warden Lake include various willow species, bulrush, and cattails.

Riparian habitat occurs along several coastal streams in the Estero planning area, including Villa, Willow, Toro, Morro, San Bernardo, Chorro and Los Osos Creeks. The structure of the riparian plant community, in addition to the high species diversity, provides important foraging, nesting, and cover opportunities for many species of terrestrial wildlife. Although some segments of riparian corridors occurring in the planning area have been disturbed by activities such as livestock grazing and development, they continue to remain critical as terrestrial wildlife habitat. Riparian corridors within the planning area provide roosting and foraging habitat for numerous migratory bird species as well. Many migratory bird species are dependent upon a well-developed riparian corridor for habitat during overwintering. In addition, due to the cover provided by the dense vegetation canopy, resident wildlife species will typically utilize riparian areas as corridors for movement between various habitat types. Vegetation of the riparian community contributes to aquatic habitat for species existing in the adjoining stream. Overhanging branches and submerged roots contribute to existing habitat within streams located in the planning area.

Wetland habitats such as freshwater marshes and seeps, estuaries, coastal saltmarshes, vernal pools and stream channels are considered sensitive by several regulatory agencies including the DFG and the USFWS. Although wetland habitats are found within several locations within the Estero planning area, the overall occurrence of these areas continues to decline. Stream channels and banks are specifically addressed by the CDFG Code sections 1600-1603 (Streambed Alteration Agreement). Waters of the U.S., including stream channels and wetlands, fall under the jurisdiction of the U.S. Army Corps of Engineers (ACOE) under Section 404 of the Clean Water Act.

1. Plants.

Many sensitive plant taxa are recorded within the Estero planning area (CNDDB, 1992). Table 3.4-1 presents all sensitive plant species identified by the CNDDB as existing in the planning area. The salt marsh bird's beak (*Cordylanthus maritimus maritimus*) is listed as a federal and state endangered species. This subspecies occurs in association with coastal salt marsh communities and is documented as occurring at Sweet Springs Marsh and along the northeastern edge of the sand spit. The Chorro Creek bog thistle (*Cirsium fontinale obispoense*), a San Luis Obispo County endemic species, is listed by the state and federal governments as endangered. This subspecies occurs in association with serpentine outcrop areas and may potentially occur within the planning area along areas of Chorro Creek. The federally endangered California

sea blite (*Suaeda californica*) occurs within the Morro Bay Estuary in association with coastal salt marsh communities.

Central dune scrub and maritime chaparral communities of the Estero planning area support numerous special-status plant species including a few rare species of manzanita (*Arctostaphylos* spp.). Indian Knob mountainbalm (*Eriodictyon altissimum*) is listed by the state and federal governments as an endangered species. This species occurs within chaparral and dune scrub communities and is found within the planning area in stabilized sandy substrates south and east of Los Osos. Morro manzanita (*Arctostaphylos morroensis*) is federally listed as threatened. It occurs in the vicinity of the Los Osos and Montana de Oro in association with central dune scrub and chaparral communities. Other rare plants that are known from dune scrub or chaparral communities of the planning area include sand almond (*Prunus fasciculata* var. *punctata*), Arroyo de la Cruz manzanita (*Arctostaphylos cruzensis*), beach spectaclepod (*Dudleya abramsii* spp. *bettinae*), and Blochman's leafy daisy (*Erigeron blochmaniae*).

Annual grassland habitats of the Estero planning area are known to support or provide potential habitat for a variety of herbaceous species including, but not limited to, Cuesta Pass checkerbloom (*Sidalcea hickmanii anomala*), San Benito fritillary (*Fritillaria viridea*), club-haired mariposa lily (*Calochortus clavatus clavatus*), adobe sanicle (*Sanicula maritima*), and San Luis mariposa lily (*Calochortus obispoensis*). The adobe sanicle is a San Luis Obispo County endemic and is listed by the state as rare and is a federal species of concern. This species is restricted to highly localized, seasonally wet areas near the coast and is generally found in association with grassland communities. The CNDDB documents adobe sanicle as occurring near the base of Cerro Romauldo (within the Other Watershed secondary study area).

2. Wildlife.

Fish. Coastal streams along the northern and central California coast have historically supported sensitive aquatic species such as southern steelhead (*Oncorhynchus mykiss*). These anadromous rainbow trout return from the ocean to spawn in freshwater streams during the spring. This species is listed as threatened by the National Marine Fisheries Service (NMFS) and a species of special concern by the DFG (CDFG). The original range of steelhead trout was from northern Mexico to southeastern Alaska, and inland along major tributaries such as the Columbia, Snake, Clearwater, and Salmon rivers. In the Estero planning area, steelhead trout occur in Toro, San Luisito, Chorro, Pennington, and San Bernardo Creeks. This species is threatened by low instream flows resulting from water diversion, ground water pumping, periodic drought, and water quality degradation (e.g., siltation, urban and agricultural pollutants).

Although steelhead are generally spring spawners, they will often move up coastal streams following the first significant rainfall in the fall and wait until spring to spawn. Spawning takes place in riffle areas that contain clean, coarse gravel. Eggs hatch in 30-60 days and the fry emerge from the gravel about 14 days after hatching. After emerging from the gravel beds, juvenile steelhead trout typically move upstream to deep pools and remain in freshwater for 2-3 years before returning to the sea. Adults and juveniles will typically move downstream to the sea between February and June; however, the timing of the runs depends on the availability of high water conditions.

The tidewater goby (*Eucyclogobius newberryi*) is a small fish that is known to occur in brackish lagoons along the central California Coast. Within the Estero planning area, this species has been documented as occurring in Los Osos, Toro, Chorro, Villa, Cayucos and Old Creeks. Tidewater goby habitat within these areas ranges from the mouths of the streams to approximately 1.5 to 2.0 miles upstream. This species is currently threatened by various factors including water quality degradation and low instream flows caused by water diversions and periodic drought.

Amphibians and Reptiles. Two sensitive amphibian species are identified as potentially occurring in the Estero planning area. These species include the California tiger salamander (*Ambystoma californiense*) and the California red-legged frog (*Rana aurora draytonii*). The California red-legged frog occurs in ponds or other

sources of permanent water with aquatic vegetation. It has been documented as potentially occurring in several locations along Chorro Creek and its tributaries, and within other smaller drainages of the planning area. California red-legged frogs are most often associated with aquatic habitats, but will utilize adjacent upland areas for refuge during extreme high flow periods. The California tiger salamander breeds in vernal pools and temporary ponds and frequents quiet waters of reservoirs, lakes, and streams. California tiger salamanders have potential to occur in riparian and dense upland habitat within the planning area.

Three sensitive reptiles have been identified through the CNDDB and by review of previous studies as occurring within the Estero planning area. The aquatic southwestern pond turtle (*Clemmys marmorata pallida*), can be found in ponds, marshes, rivers, streams, and irrigation ditches that typically have a rocky or muddy bottom and aquatic vegetation. This species has been identified by the CNDDB as existing in Villa, Toro, Cottontail, Old, and Chorro Creeks, and is known to occur in other local coastal streams as well. The two-striped garter snake *(Thamnophis hammondii)* has potential to occur in the planning area within aquatic and riparian habitats associated with the lower reaches of Chorro Creek. The black legless lizard (*Anniella pulchra nigra*) is documented by the CNDDB in planning area locations supporting coastal foredune and dune scrub habitats. The black legless lizard primarily occurs in areas containing sandy or loose organic soils, where abundant leaf litter is present. Little is known about the status and distribution of this lizard within the vicinities of Los Osos and Morro Bay. Based on the absence of information regarding the distribution of this species, it should be assumed that black legless lizard could occur in larger, undisturbed areas of central dune scrub.

Mammals. Three mammals classified as sensitive are known to occur in the Estero planning area. The Southern sea otter occurs along the northern and central California coast and is listed federally as threatened. In the planning area, sea otters are found within quiet water areas associated with Morro Bay and in nearshore marine habitats. The American badger *(Taxidea taxus)* is known to exist in the planning area and is listed by CDFG as a species of special concern. Several active American badger dens have been previously identified within grassland habitats of the Chorro Valley area. The Morro Bay kangaroo rat (*Dipodomys heermanni morroensis*) is identified by the CNDDB as occurring in various locations throughout the planning area and is listed as a federal and state endangered species. Potential habitat for this subspecies occurs primarily south of the community of Morro Bay in coastal sage scrub habitats. Morro Bay kangaroo rats prefer undisturbed areas with stabilized sandy soil substrate. Surveys have shown that kangaroo rat habitat has seriously declined since the 1950s. Since 1996, a variety of surveys of undeveloped parcels located in the northern and northeastern portions of the community of Los Osos have been conducted by Michael O'Farrel. The various surveys conducted yielded no capture or sign of kangaroo rat. In addition, O'Farrel indicated that the various sites surveyed were no longer suitable for occupation by the species due in part to site conditions being consistent with habitat that has reached seral conditions (O'Farrel, 1998). Although these findings do not preclude Morro Bay kangaroo from occurring within other portions of the Los Osos and Baywood Park areas, the potential for occurrence would still be considered low.

Birds. Many raptors, such as the northern harrier (*Circus cyaneus*) and Cooper's hawk (*Accipter cooperii*), use open space and agricultural lands as foraging areas. The Cooper's hawk is documented by the CNDDB as nesting in coast live oaks and deciduous trees of riparian areas located within planning area. The burrowing owl is known to occur in open grasslands and farmlands. Active burrows have been identified in various locations throughout grassland areas of the Chorro Valley. The ferruginous hawk (*Buteo regalis*) is known to winter in grassland and open habitat of the planning area, but does not nest in the area. Loggerhead shrikes (*Lanius ludovicianus*) are predatory birds that inhabit open grassland habitat and use adjacent trees and/or shrubs for nesting. This species has been observed in several locations in the planning area within the Chorro Valley. California brown pelicans (*Pelecanus occidentalis californicus*), a federal and state endangered species, occur in estuarine and marine habitats. The pair of adult American peregrine falcons (*Falco peregrinus anatum*) which occur on Morro Rock utilize various habitat areas throughout the planning area for hunting other species of birds. The western snowy plover (*Charadrius alexandrinus nivosus*) has been documented as utilizing sandy beach areas of the planning area, including Atascadero State Beach, for breeding and nesting.

The California clapper rail *(Rallus longirostris obsoletus)* and California black rail (*Lateralus jamaicensis coturniculus*) are known to utilize salt marsh and brackish marsh areas of the Morro Bay Estuary.

Rookeries are areas where various bird species congregate to breed and nest. Within the planning area great blue herons (*Ardea herodias*), great egrets (*Casmerodius albus*), snowy egrets (*Egretta thula*), and black-crowned night herons (*Nycticorax nycticorax*) are known to breed and nest at various locations within Morro Bay State Park. These species are not listed as sensitive by the CNDDB, but rather, rookeries of these particular species are considered sensitive due to their restricted distribution and the species' sensitivity to disturbance.

Invertebrates. Two sensitive snail species are documented as occurring within the Estero planning area. The Morro shoulderband dune snail (*Helminthoglypta walkeriana*) is found within Montana de Oro State Park and the Los Osos area in coastal foredune and central dune scrub habitats. In 1985 Roth found that the geographic limits of this species generally coincided with the limits of stabilized, vegetated, dune habitats located east, southeast, and south of Morro Bay (Roth, 1985). Morro shoulderband snail has been found to be closely associated with several species of shrubs including mock heather, seaside golden yarrow (*Eriophyllum staechadifolium*), deerweed (*Lotus scoparius*), sand almond, and with the introduced iceplant; however, Morro shoulderband snail is found most frequently within mock heather (Roth 1985). Other plants that commonly occur in areas occupied by this species include black sage, dune buckwheat, California sagebrush, dune lupine (*Lupinus chamissonis*), and California croton (Roth, 1985). Within dune scrub communities, Morro shoulderband snail most typically occurs in the detritus located near the base of a shrub's trunk, or in areas located beneath a shrub's canopy, where branches are located close to the ground. The California brackish water snail (*Tryonia imitator*) is associated with aquatic habitats of the planning area that contain varying levels of salinity and substrates of silty mud to coarse sand. The CNDDB documents the California brackish water snail as occurring in the marsh near the mouth of Los Osos Creek, near the Turri Road and South Bay Boulevard intersection.

There are no known "rare or endangered" insect species documented as occurring within the Estero planning area. However, the State of California has identified the monarch butterfly *(Danaus plexippus)* as a "threatened phenomenon", due to the limited number of sites which are available for overwintering and the remaining sites' sensitivity to destruction. The monarch butterfly is documented by the CNDDB as utilizing various locations throughout the planning area as winter roost sites. This species roosts in wind-protected tree groves, with groves of eucalyptus being heavily utilized within the planning area. Most monarch roost sites within the planning area are documented by the CNDDB as occurring in the vicinity of Montana de Oro State Park, the community of Los Osos, and near the Morro Bay State Park campground. Another significant site is along Little Cayucos Creek near downtown Cayucos.

Wildlife Networks. "Migration corridors" are connections between habitat patches that allow for physical and genetic exchange between animal populations. These connections may be local, such as between foraging and nesting or denning areas, or regional in nature. As undisturbed habitats become surrounded by urban development, they become isolated from neighboring areas. Migration corridors provide critical linkages between islands of open space, isolated foraging and breeding habitats, and other important wildlife use areas. Loss of such corridors limits the diversity of gene pools within the isolated populations potentially leading to inbreeding and lack of genetic variability.

Drainage courses and adjacent upland habitats typically function as migration corridors providing water and cover for animals. Throughout the Estero planning area numerous species of wildlife utilize well- developed riparian corridors during transition between various habitat types. Bobcat and coyote, as well as other small mammals, use the cover provided by riparian corridors while traveling between specific habitat types utilized for feeding or while seeking water. There are no major seasonal migrations of black-tailed deer in the Estero planning area. However, this species frequently utilizes drainage courses when moving from areas where cover is provided to areas where sufficient food supplies are available, such as in agricultural lands. Other species of wildlife, such as the southwestern pond turtle, also rely on the cover provided by riparian

vegetation while moving between aquatic and upland habitats within drainages throughout breeding seasons.

5.8.1.2 Community-Specific Biological Resource Characteristics

a. Rural Area.

The Rural portion of the Estero planning area includes all land located outside of the City of Morro Bay and the communities of Cayucos and Los Osos. It also contains the Morro Bay Estuary, portions of the Los Osos and Chorro Valleys, Montana de Oro State Park, Morro Bay State Parks and Beaches, and several of the Morros. Vegetation of the plant communities of this area is very diverse due to the variability in substrates, topography, and water regimes. Within the Chorro and Los Osos Valleys, the primary habitat type is annual grassland. However, well-developed riparian forest and riparian scrub occurs in various locations along the major drainages including Los Osos Creek and Chorro Creek. Other major drainages of the Rural area that include well-developed riparian vegetation include Toro Creek and portions of Villa Creek. A variety of plant communities and habitat types, including estuarine, coastal salt marsh, and coastal brackish marsh, form a mosaic and comprise the Morro Bay Estuary. Montana de Oro and Morro Bay State Parks contain numerous plant communities and habitat types, many of which are considered sensitive. These include, but are not limited to, open sandy beach, coastal foredune, central dune scrub, and chaparral communities. The Morros support dense stands of coast live oak woodland and well-developed areas of central maritime chaparral.

The identified plant communities and habitat types of the Rural Area are known and have potential to support numerous special-status plant and animal species. Federal and state-listed plants that are known to occur near coastal portions of the Rural Area include Morro manzanita, salt marsh birds beak, beach spectaclepod, Indian Knob mountainbalm, and California sea blite. Various plant species that have the potential to occur in more inland areas of the Rural Area include Chorro Creek bog thistle, adobe sanicle, and Cuesta Pass checkerbloom. Nearly all of the sensitive animal taxa identified in Table 5.8-1 are documented as occurring in various locations within the Rural area. Federal or state-listed species which are known to be associated with coastal areas include western snowy plover, American peregrine falcon, California black rail, California brown pelican, California clapper rail, and southern sea otter. Black legless lizard, Morro Bay kangaroo rat, and Morro shoulderband snail, are known to occur in dune and dune scrub of the Rural area. Various drainages of the Rural Area are expected to support southern steelhead, tidewater goby, and California red-legged frog. Extensive grassland areas of the Los Osos and Chorro Valleys have potential to provide suitable habitat for burrowing owl and American badger. Eucalyptus woodland located within Montana de Oro State Park and Morro Bay State Parks are known to contain significant overwintering sites for Monarch butterfly.

b. Cayucos.

The Cayucos area is located in the northwestern portion of the Estero planning area. Major drainages include Villa, Cayucos, and Little Cayucos Creeks. Because much of land located within the Cayucos area is currently developed, the diversity of plant communities and habitat types is low. Major plant communities and habitat types of this area include open sandy beach, annual grassland, and the various "wetland type" habitats associated with the drainages, including estuarine, coastal salt marsh, coastal brackish marsh, riparian scrub, and riparian woodland. Well-developed riparian habitat occurs along portions of Cayucos and Villa Creeks.

No federal or state-listed plant species are known from the Cayucos area. However, the identified plant communities and habitat types of the Cayucos area are known and have potential to support several special-status animal species. Federal or state-listed species which are known to be associated with coastal areas include western snowy plover, American peregrine falcon, California brown pelican, and southern sea otter. Nesting sites for western snowy plover have been documented as occurring along beaches located in the Cayucos area, including Morro Strand Beach. Major drainages of the Cayucos area are expected to support southern steelhead, tidewater goby, California red-legged frog, and southwestern pond turtle. A small parcel

within the Cayucos Area contains overwintering habitat for the Monarch butterfly, where a grove of eucalyptus and cypress provides shelter.

c. Los Osos.

The Los Osos area contains a variety of plant communities and habitat types that are considered sensitive by CDFG or other regulatory agencies. Central dune scrub is the dominant natural plant community of the Los Osos area. Larger, somewhat undisturbed areas of central dune scrub occur primarily along the eastern and southern fringes of Los Osos. These larger, undisturbed areas of central dune scrub occur primarily within the greenbelt (identified in Figure 6-3, page 6-15, in the July 2003 Draft Estero Plan Update). Many smaller empty lots located within more developed areas of Los Osos contain remnant patches of central dune scrub . Along the southern-most fringe of the Los Osos area, central dune scrub integrates with maritime chaparral and coast live oak woodland. Along the eastern edge of the Los Osos areas, the Los Osos Creek corridor meanders in a northwesterly direction. Portions of this corridor contain well-developed riparian forest and riparian scrub.

The identified plant communities and habitat types of the Los Osos area are known and have potential to support numerous special-status plant and animal species. Federal and state-listed plants that are known to occur near coastal portions of the Los Osos area include Morro manzanita, and Indian Knob mountainbalm. Nearly all of the sensitive animal taxa identified in Table 5.8-1 are documented as occurring in various locations within the Los Osos area. Central dune scrub and foredune communities of the Los Osos area are known or have potential to support black legless lizard, Morro Bay kangaroo rat, and Morro shoulderband snail. The portion of Los Osos Creek located along the eastern edge of the Los Osos area is expected to support southern steelhead, California red-legged frog, and southwestern pond turtle. In addition, the lower reaches of Los Osos Creek may be frequented by tidewater goby, California black rail, and California clapper rail.

d. Other Watershed Area.

The Other Watershed area extends beyond the Estero planning areas into portions of the Salinas River, San Luis Obispo and San Luis Bay Planning Areas. Plant communities of this area is highly variable and range from open grassland areas associated with the Chorro and Los Osos Valleys, to dense chaparral and coast live oak woodlands located at higher elevations, such as along the Irish Hills and Cuesta Ridge. Well-developed riparian forest and riparian scrub occurs along portions of Los Osos Creek and its tributaries, and Chorro Creek and its major tributaries located east and north of the Estero planning area.

The identified plant communities and habitat types of the Other Watershed area are known and have potential to support numerous special-status plant and animal species. Various federal or state-listed plant species that have potential to occur in portions of the Other Watershed area include Chorro Creek bog thistle, adobe sanicle, and Cuesta Pass checkerbloom. The various drainages of the Other Watershed area have potential or are known to support southern steelhead, California red-legged frog, and southwestern pond turtle. Extensive grassland areas of the Los Osos and Chorro Valleys have potential to provide suitable habitat for burrowing owl and American badger.

e. Cayucos Fringe.

The Cayucos Fringe area is located outside of the Estero planning area and within the Adelaida Planning area. Plant communities of this area are highly variable and range from open grassland and coastal scrub areas closer to the coast and just outside of Cayucos, to mixtures of chaparral, coast live oak woodland, foothill woodland, and grassland, at higher elevations and farther inland from the community of Cayucos. Well-developed riparian forest and riparian scrub occurs along portions of the upper reaches of Villa, Cayucos, Little Cayucos, and Cottontail Creeks.

No federal or state-listed plant species are known from the Cayucos Fringe area. However, serpentine substrates of the area have potential to support San Luis Obispo serpentine dudleya and Jones' layia. The

identified plant communities and habitat types of the Cayucos Fringe area are also known and have potential to support several special-status animal species. The various drainages of the Cayucos Fringe area have potential or are known to support California red-legged frog, southwestern pond turtle, and nesting Cooper's hawk. Grassland, woodland, and coastal scrub areas have potential to provide suitable habitat for burrowing owl and American badger, and be frequented by a variety of raptors.

5.8.2 Regulatory Setting

This section identifies those regulations that pertain to biological resources of the Estero planning area.

a. General Regulations

1. California Coastal Act of 1976. One of the primary objectives of the California Coastal Act is to preserve, protect, and enhance environmentally sensitive habitat areas (ESHA). The Los Osos Dune Sands SRA described in the proposed Area Plan, is being considered for ESHA status under a separate effort. Section 30107.5 of the Coastal Act defines an "Environmentally Sensitive Area" as:

> "Any area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which could be easily disturbed or degraded by human activities and developments."

There are three important elements to the definition of ESHA in Section 30107.5. First, a geographic area can be designated ESHA either because of the presence of individual species of plants or animals or because of the presence of a particular habitat. Second, in order for an area to be designated ESHA, the species or habitat must be either rare or "especially valuable". Finally, the area must be easily disturbed or degraded by human activities.

In addition to the ESHA definition in Section 30107.5, the central provisions of Chapter 3 of the Coastal Act provide further guidance for protecting ESHA. These provisions includes Sections 30231, 30240, and 30250(a) as follows:

> Section 30231 provides that the biological productivity of coastal waters, streams, wetlands, estuaries, and lakes must be maintained and, where feasible, restored. This is to be achieved by, among other means: minimizing adverse effects of wastewater discharges and entrainment; controlling runoff; preventing depletion of groundwater supplies and substantial interference with surface water flow; encouraging wastewater reclamation; maintaining natural buffer areas that protect riparian habitats; and minimizing alteration of natural streams.
>
> Section 30240 prohibits any significant disruption of habitat values, and limits development within ESHA to uses that are dependent on the resources. It also requires development adjacent to ESHA be sited and designed to prevent significant degradation and be compatible with the continuance of the habitat.
>
> Section 30250(a) directs new residential, commercial, or industrial development to existing developed areas. Where developed areas cannot accommodate new development, it is to be located in other areas where it will not have significant adverse effects, either individually or cumulatively, on coastal resources.

The underlying goals, programs, and policies of the July 2003 Draft Estero Area Plan Update are not mutually exclusive of those set forth in the Coastal Act. Although the focus of the Draft Estero Area Plan

may differ from the Coastal Act, many of the natural resources at stake are the same, and the ultimate goal of protecting sensitive species and habitats is shared by both.

2. Clean Water Act of 1977. Regulatory protection for water resources throughout the United States is under the jurisdiction of the Army Corps of Engineers (ACOE). Section 404 of the Clean Water Act prohibits the discharge of dredged or fill material into waters of the United States without formal consent from the ACOE. Delineation of wetlands and other waters of the United States is required to determine acreage affected by dredge spoil or fill disposal. Impacts to biological resources are assessed as part of the permit process by the U.S. Fish and Wildlife Service. Policies relating to the loss of wetlands generally stress the need to compensate for wetland acreage losses by creating wetlands from non-wetland habitat on at least an acre-for-acre basis.

3. Section 7 or Section 10 of the United States Endangered Species Act. The United States Endangered Species Act provides legislation to protect federally listed plant and animal species. Impacts to listed species resulting from the implementation of a project would require the responsible agency to consult the USWFS. Formal consultations must take place with the USFWS pursuant to Section 10 of the Endangered Species Act, with the USFWS then making a determination as to the extent of impact to a particular species. If the USFWS determines that impacts to a species would likely occur, alternatives and measures to avoid or reduce impacts must be identified. Section 7 also requires determination of environmental impacts, and thorough biological assessment. Section 7 applies to projects in which a federal agency may be involved, either through financial support or project leadership.

4. State of California Endangered Species Act. The State of California Endangered Species Act mandates that in instances where impacts to a state-listed endangered species would occur, the lead or responsible agency must contact the DFG and enter into formal consultation. Impacts to the state-listed species would be evaluated and identification of mitigation measures would likely be required.

5. DFG Code, Chapter 6. This code governs state-designated wetlands, including riparian and stream habitat, and mandates that mitigation be implemented to replace wetland extent and value lost to development. A Section 1603 (Fish and Game Code) Agreement is required for any alteration to a stream or lake, as well as to their associated riparian habitats, for purposes of development in California.

6. State Regional Water Quality Control Board - Basin Plan. The Regional Water Quality Control Board Basin Plan provides management guidelines for maintaining water quality and associated beneficial uses of streams and rivers within the central coast region of California. General water quality objectives are set forth to facilitate the maintenance of optimum habitat for various aquatic species.

7. County of San Luis Obispo - Land Use Element and Local Coastal Plan (1988). The Land Use Element of the San Luis Obispo County General Plan contains policies and Estero planning area standards for the Estero planning area. Included are mandated standards for development and identification of measures to avoid or minimize potential impacts to associated biological resources. Planning area standards including site planning and design, have been identified for several Sensitive Resource Areas within the planning area.

8. County of San Luis Obispo - Coastal Zone Land Use Ordinance (1996). The Coastal Zone Land Use Ordinance (CZLUO) includes limitations on development within and near wetlands, streams and associated riparian areas, terrestrial and marine habitats, Sensitive Resource Areas, and environmentally sensitive habitats. The CZLUO also identifies general setbacks for wetland and riparian habitat, as well as minimum site design and development standards near various sensitive habitat areas. An amendment to the

CZLUO is currently proposed to address a number of issues, including sensitive resources, in the coastal zone of San Luis Obispo County. The following standards, among others, are proposed:

- **Minimizing impacts.** Parcel lines shall be configured so that resulting development minimizes road construction, grading, erosion, siltation of creeks, visual effects, and other environmental impacts.
- **Small Parcels.** In order to protect sensitive site features (such as sensitive habitat, sensitive plant or animal species, outstanding vistas, etc.) or maintain or enhance agricultural viability, lot line adjustments may include parcels whose sizes are below the minimum sizes for the applicable land use category as specified in the CZLUO. In that case, such proposed parcels and resulting development shall be concentrated in the least sensitive and least agriculturally viable areas, while the remaining larger parcel(s) (outside of building sites allowable by the CZLUO) permanently protect the identified sensitive features and viable agricultural land.
- **Significant Natural or Cultural Features or Scenic Vistas.** The following natural and cultural features and scenic vistas, as identified in this plan or by applicable study, shall be included in common open space areas where that would best protect such features: environmentally sensitive habitats; areas of archaeological, cultural or historic importance; natural slopes equal to or greater than 30 percent; rock outcrops; highly prominent ridgelines and hillsides; and areas subject to natural hazards such as flood, geologic, and seismic hazards.
- **Road and Bridge Design, Construction and Maintenance.** Roads and bridges shall be designed, constructed and maintained to protect sensitive resources (such as aquatic habitat and scenic vistas) and prime agricultural soils to the maximum extent feasible; to minimize terrain disturbance, vegetation removal and disturbance of natural drainage courses; to avoid the need for shoreline protective devices; and to provide for bikeways and trails, consistent with the Circulation Element. In addition, the following measures shall be implemented:

    - Contour slopes to blend in with adjacent natural topography
    - Replant graded areas with native vegetation
    - Include pollution prevention procedures in the operation and maintenance of roads and bridges to reduce pollution of surface waters
    - Apply fertilizers and nutrients at rates that establish and maintain vegetation without causing nutrient runoff to surface waters
    - Give preference to aerial crossings of watercourses

- **Sensitive Habitat and Groundwater.** Runoff from roads and development shall not adversely affect sensitive habitat, groundwater resources and downstream areas, and shall be treated to remove floatable trash, heavy metals and chemical pollutants as necessary prior to discharge into surface or groundwater.
- **Impervious Surfaces.** New development shall be designed to minimize the amount of impervious surfaces.
- **Stormwater Infiltration.** The design of drainage facilities in new land divisions and other development subject to discretionary review shall maximize groundwater recharge through on-site or communitywide stormwater infiltration measures. Examples of such measures include constructed wetlands, vegetated swales or filter strips, small percolation ponds, subsurface infiltration basins, infiltration wells, and recharge basins. Where possible, recharge basins shall be designed to be available for recreational use.

- **Landscape Plans–Nutrient Runoff.** Landscape plans that are required by Chapter 23.04 of the Coastal Zone Land Use Ordinance shall include a note that fertilizers and nutrients are to be applied at rates that establish and maintain vegetation without causing nutrient runoff to surface waters.
- **Chemical Control.** Land use permit applications that require discretionary review for projects that have potential to release toxic or hazardous materials (e.g. gas stations, businesses that handle hazardous wastes) shall include measures, and where applicable, Best Management Practices that: a) minimize the amounts of potential contaminants that may be stored or handled; b) assure proper containment and c) prevent release of contaminants into the environment. These measures and practices shall be referred to the County Division of Environmental Health for review and for recommendations that shall be implemented through the land use permit.
- **Natural Drainage Courses and Setbacks.** To the maximum extent feasible, all drainage courses shall be retained in or enhanced to appear in a natural condition, without channelization for flood control. New development shall be set back from the upland edge of riparian vegetation the maximum amount feasible. In the urban areas (inside the URL, except as otherwise shown in Table 7-2, "Coastal Stream Setbacks" for Cayucos), this setback shall be a minimum of 50 feet. In the rural areas (ouside the URL), this setback shall be a minimum of 100 feet. A larger setback will be preferable in both urban and rural areas, depending on parcel configuration, slope, vegetation types, habitat quality, water quality, and any other environmental considerations. A greater setback may be required by other standards in this plan. The setback area shall be maintained in an undisturbed condition and restored with a buffer strip consisting of native vegetation, where applicable.
- **Development Location.** New development shall be sited to avoid areas with high constraints or sensitivity for erosion potential, such as areas of alluvium near stream channels, areas underlain by the Franciscan Formation with slopes greater than 20 percent or areas of existing landslides.

The above standards have not yet been adopted and therefore cannot be considered part of the regulatory setting for analysis in this EIR. However, if adopted, the measures would apply to the Estero Area and would further alleviate potential impacts.

9. County of San Luis Obispo - Coastal Plan Policies (1988). The Coastal Plan Policies of the San Luis Obispo County Land Use Element of the General Plan sets forth policies for protecting environmentally sensitive habitat areas within the coastal zone. Within the Coastal Plan Policies environmentally sensitive habitat areas occurring in the county are identified along with specific measures for protecting these sensitive resources, many of which are implemented by the CZLUO (see above).

10. County of San Luis Obispo - Environment Plan (1974). The Conservation Element of the Environment Plan identifies goals for conserving natural resources within the county. Within this document, general recommendations for protecting natural resources of San Luis Obispo County, such as wildlife and vegetation, have been set forth.

11. County of San Luis Obispo Agriculture and Open Space Element (1998). The Agriculture and Open Space Element of the County General Plan identifies open space lands worthy of protection, and establishes goals, policies and implementation measures to enable long-term protection of those resources.

b. Combining Designation/Sensitive Resource Areas

Several Sensitive Resource Areas (SRA) are listed in the proposed Estero Area Plan. These areas are designated SRAs due to their unique biological communities or the presence of sensitive plant and/or animal species. SRAs proposed in the plan are listed in the table below. Important ecological characteristics of each SRA are described in Chapter 6 of the Estero Area Plan LUE.

Ocean Shoreline	Morro Bay Estuary	Morro Bay Sand Spit
Morro Bay Shoreline	Sweet Springs and Cuesta-by-the-Sea Marsh	Los Osos Estuary
Elfin Forest	Baywood Peninsula	Fairbanks Point
Los Osos Dune Sands Habitat	Los Osos Monarch Butterfly Habitat	Los Osos Oaks State Reserve
Los Osos Creek	Eto and Warden Lakes	Hazard Canyon and Vicinity
Montana de Oro Grassland	Coon Creek	Cayucos Monarch Butterfly Habitat
Whale Rock Reservoir Watershed	Camp San Luis Obispo Relict Grasslands	

5.8.3 Significance Thresholds

Significance thresholds are based upon the State CEQA Guidelines and local/regional plans and ordinances. Using these guidelines, the proposed project would have a significant impact to the biological resources of the site or region if it would:

- Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies or regulations, or by the DFG or U.S. Fish and Wildlife Service.

- Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the DFG or U.S. Fish and Wildlife Service.

- Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrologic interruption or other means.

- Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

- Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

- Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. The USFWS prepared a recovery plan for the Morro shoulderband snail which identifies several areas in Los Osos as necessary for survival of the species.

Plant or animal taxa are considered locally important if they meet any of the following criteria:

- Taxa (species, subspecies, or varieties) that are limited in distribution in the county or region, or are endemic (limited to a specific area) to the region;
- Taxa that are at the extremes of their range or are separated from the known range for the taxon;
- Taxa whose habitat requirements make them susceptible to local extinction as a consequence of development, the introduction of barriers to movement, and/or accompanying increases in human activity;

- Populations of a particular species which exhibit unusual adaptations or are quality examples of the species; and
- Taxa that are considered sensitive by recognized monitoring groups (i.e., Audubon Society, California Native Plant Society, DFG, etc.).

Communities are considered locally important if they meet any of the following criteria:

- Plant communities or habitat types that are of singular or limited occurrence within the county or project area;
- Plant communities or habitat types that are critical or essential habitat for rare, threatened, endangered or locally important species.
- Plant communities, habitat types or geographic areas that link substantial, intact open space areas;
- Plant communities or habitat types that exhibit characteristics approximating pristine conditions;
- Representative habitat for particular species of plants or animals;
- Communities considered sensitive by recognized monitoring groups such as the California Natural Diversity Database, DFG, Audubon Society, California Native Plant Society; and
- Ephemeral or perennial wetlands defined as areas which sporadically, seasonally, or perennially serve to emit, conduct, or impound water, making it available to water-dependent and/or facultative associations of plants or animals.

5.8.3 Proposed Project Impact Analysis and Mitigation Measures

5.8.3.1 Area-Wide Impacts

Impact BR-1: Increasing urbanization within the Estero Planning area may result in direct or indirect impacts to sensitive species or their habitat.

Special Policies, Programs & Standards

The proposed Estero Area Plan includes the following standards. Many of these provide mitigation to impacts that could result from development under the Estero Area Plan. **NOTE: subsequent modification or elimination of the policies that are cited in this section might modify the conclusions of this EIR:**

- Protect contiguous areas of sensitive habitats (in SRA or not).
- Concentrate or cluster development on the least environmentally sensitive portions of the site in order to protect and sustain ecologically significant areas of oak woodland and coastal strand, coastal sage scrub, maritime chaparral communities, all riparian habitat corridors, rare, endangered or threatened species (as defined in the State CEQA Guidelines); other significant stands of vegetation (pg.7-9 through 7-10, Draft Estero Area Plan).
- Provide contiguous open space areas that connect, where feasible, to adjacent open space when clustering or concentrating development to protect the above resources.
- Development shall comply with the minimum setbacks from environmentally sensitive habitats that are required in the Estero Area Plan and the CZLUO.
- Policy IV.I.C: Marine Resources. Make every effort to secure permanent protection and management of the county's significant marine resources using programs and legislation such as the national estuary, state and national marine sanctuary program, and other methods.
- Other Sensitive Habitat - Location and Types of Habitat. The county should pursue protection and management of the following sensitive habitats (not in priority order):
- Ecologically significant areas containing riparian habitat, oak woodland, coastal sage scrub, dune scrub, coastal strand, or maritime chaparral communities

- Where appropriate, continue to obtain open space easements for sensitive wetlands and bayfront areas, and encourage other agencies and conservation organizations to obtain open space and conservation easements and fee title to these areas.

Increasing urbanization within the Estero planning area would result in the gradual conversion of natural biological habitat to man-made structures, maintained landscapes, and disturbed areas. This would result in the direct removal or fragmentation of habitats known to support special-status species. Habitat at the edge of urban areas may become degraded with reduced numbers and diversity of plants and wildlife due to human intrusion associated with recreational use of such areas, invasion of exotic plants, light and noise, erosion and siltation, pollutants in urban runoff, and wildlife depredation by domestic cats and dogs. In addition, development of specific parcels may result in direct impacts to sensitive species, such as the Morro shoulderband snail in Los Osos and environs. Disturbance of habitat suitable for the Morro shoulderband snail in the Los Osos area is expected to approach approximately 90-100 acres. The significance of these impacts is dependent on the nature of development and the value and sensitivity of the adjacent habitat as well as the success of the regional HCP now in progress. The proposed Area Plan contains a number of policies and programs intended to reduce impacts to sensitive species. However, impacts are considered potentially significant.

Impact BR-2: Increasing urbanization within the Estero planning area may adversely impact riparian habitat, wetlands, and other waters of the United States, by increasing impervious surfaces, accelerating erosion and input of sediment and pollutants to aquatic habitats occupied by sensitive species.

Special Policies, Programs & Standards

Refer to the standards cited above. In addition, the following standards and policies are proposed:

1. Development shall be designed to minimize the amount of impervious surface.
2. Runoff from roads and development shall not adversely affect sensitive habitat, groundwater resources, and downstream areas.
3. Policy - Flood-prone natural drainage courses (Refer to Section 5.6) should be maintained in their natural state to protect native vegetation and wildlife habitats.
4. The design of drainage facilities in new land division and other development subject to discretionary review shall maximize groundwater recharge through in-site or community-wide stormwater infiltration measures. Recharge basins shall be designed to be available for recreational use.
5. Encourage agriculturalists and other landowners to participate in education and assistance programs and other voluntary and cooperative programs that encourage sustainable land management practices (Best Management Practices) that reduce erosion, sedimentation and nutrient levels in the watershed.
6. Slow the process of bay sedimentation. Keep Chorro and Los Osos Creeks and other watercourses free of excessive sediment and other pollutants to maintain fresh water flow into the estuary, nurture steelhead and support other plant and animal species.
7. Roads and Bridges. The County Public Works Department should identify opportunities to reduce runoff, sedimentation and the volume and concentration of pollutants entering surface waters from county bridges and paved and unpaved roads. Measures to control sediment may include vegetated filter strips, grassed swales, detention basins, constructed wetlands, infiltration trenches, and sediment traps.
8. Sediment Reduction on County-owned Lands. The county should install and maintain sediment traps where appropriate in order to reduce sediment transport to coastal waters. The county should develop and implement other Best Management Practices to reduce sedimentation that can be used according to varying conditions and needs. The county should seek technical assistance from and coordinate with

agencies such as the Natural Resources Conservation Service, Coastal San Luis Resource Conservation District and the DFG.

9. Los Osos Drainage Plan. The Los Osos Community Services District, the County Public Works Department and/or the County Flood Control and Water Conservation District should prepare a master drainage plan for Los Osos and vicinity. The plan should use a watershed management approach to achieve the following goals:
10. Minimize flooding, erosion, sedimentation and stormwater pollutants, while providing for reuse and recharge of water and where appropriate
11. Reduce the sediment load in surface drainage from the Los Osos street system into Morro Bay in streets such as Skyline Drive, Pine Avenue, Ramona Avenue, Pismo Avenue, El Moro Avenue, and Santa Ysabel Avenue
12. Creek Restoration on County-owned Lands. Where streambank erosion is a concern, the county should implement creek restoration projects and other management measures to improve streambank morphology and stability, enhance riparian habitat and improve water quality. The county should seek technical assistance from and coordinate with agencies such as the Natural Resources Conservation Service, Coastal San Luis Resource Conservation District and the DFG.
13. Maintain, and where feasible, restore the quality and biological productivity of coastal waters, streams, wetlands, estuaries, and lakes in order to protect human health and maintain optimum populations of marine and other wildlife.

The proposed Area Plan also contains policies specific to Morro Bay Estuary and its Watershed (includes all areas except Cayucos and the Cayucos Fringe). These include measures to slow the process of bay sedimentation, maintain high water quality in the bay, minimize erosion, siltation and water pollution through sound land management, and implement a watershed approach to land use planning and practices in cooperation with local agencies and organizations. For more detail, refer to page 6-20 of the proposed Estero Area Plan.

Impact Discussion

Urban and suburban development can expose soil to processes of erosion and can accelerate sedimentation in river channels and marshes (Refer to Section 5.6 Drainage & Water Quality). Sedimentation can smother plant and animal resources within riparian and estuarine systems. While erosion/sedimentation is a natural process, the acceleration of this process due to urban growth can create significant adverse impacts, particularly when rare and sensitive aquatic habitats are degraded or converted to uplands due to sedimentation. Following development, continuing impacts to riparian systems can occur from urban runoff resulting from the conveyance of oil, grease, pesticides, fertilizers, and other wastes into drainages. While biological systems have an assimilative capacity for such pollution, this capacity is often exceeded, resulting in poor water quality and loss of biological diversity and abundance. Urban development can also increase the rate at which storm water drains from the area, due to the introduction of impervious surfaces. The higher velocity and greater quantity of urban storm water runoff may cause erosion and flooding impacts within riparian areas, resulting in direct removal of vegetation. In addition, the reduced infiltration of storm water may reduce ground water supplies otherwise potentially available during the summer drought season. The latter effect may be reduced by increased summer surface runoff from landscape irrigation. This impact is considered potentially significant.

Impact BR-3: Increased development in the Estero Area may adversely impact wildlife corridors through direct or indirect means.

Special Policies, Programs & Standards

Refer to standards cited above.

Development of the Estero Area under the proposed Area Plan may result in the development of currently

vacant parcels, which may provide value as wildlife corridors. Implementation of the Draft Plan may also result in intensification of development along riparian corridors, dissuading species from utilizing corridors. Impacts are considered potentially significant.

An example of this type of impact concerns Brant Geese. These birds regularly visit the Morro Bay estuary. They are often disturbed by kayakers and other boaters. An increase in the population of the area may increase the number of boaters. However, since most visitors are from out of the area, this will be more a function of California's population growth rather than local land use policy, and perhaps more importantly, of increased popularity of water sports.

The County has continuously cooperated with organizations like the Morro Bay National Estuary Program and the Morro Bay chapter of the National Audubon Society. These groups work to protect the sanctuary of such species through education and other programs. It is anticipated that the County will continue to cooperate with them in implementing programs such as the distribution of "kayak courtesy cards" that educate boaters about proper etiquette near avian species.

Impact BR-4: Implementation of the proposed Estero Area Plan would not conflict with local policies or ordinances protecting biological resources.

Special Policies, Programs & Standards

Refer to policies and standards cited under BR-1, above.

As the primary land use document governing the Estero Area, the proposed Area Plan sets biological protection policy and guides staff in the preparation of necessary implementing ordinances. Other policies which govern land use are largely contained in the body of the Coastal Act. Coastal Act Section 30240, ESHA, was mentioned in Section 5.8.1.3. The proposed Estero Area Plan supports the designation of the Estero Area as ESHA through a number of protective measures and support for the preparation of an Habitat Conservation Plan which would preserve and enhance sensitive habitat. The Coastal Act allows for the development of non-resource dependent land uses in ESHA at the minimum densities necessary to avoid takings law. This is reflected in the proposed plan. The plan is also consistent with Section 30250, which directs residential, commercial, and industrial development to areas already developed, or where significant adverse biological effects will not be realized. The plan concentrates development in existing developed areas, and provides for mitigation of impacts in undeveloped areas through extensive conditions. Other sections of the Coastal Act which apply to biological resources include, but are not limited to:

> "Section 30230. Marine Resources; maintenance. Marine resources shall be maintained, enhanced, and where feasible, restored. Special protection shall be given to areas and species of special biological or economic significance. Uses of the marine environment shall be carried out in a manner that will sustain the biological productivity of coastal waters and that will maintain healthy populations of all species of marine organisms adequate for long-term commercial, recreational, and educational purposes."

The proposed Estero Area Plan contains policies which support the preservation and enhancement of marine resources, including through runoff reductions, permanent preservation through national sanctuary status or similar programs, and preservation of intact habitat. Overall, development is reduced under the proposed Estero Area Plan in deference to the limitations of natural and public resources. The proposed Area Plan is therefore considered consistent with this portion of the Coastal Act.

Impacts associated with policy and ordinance consistency are considered less than significant.

Impact BR-5: The proposed Estero Area Plan would not conflict with any adopted habitat conservation plans.

Special Policies, Programs & Standards

Refer to standards and policies cited under BR-1 above, and d, Los Osos, in the following pages.

A Habitat Conservation Plan (HCP) is being prepared for the community of Los Osos and its environs in association with the Los Osos Wastewater Project. The County is assisting in the preparation of the document, which will guide habitat and species conservation throughout buildout of the area. A special portion of Chapter 6 has been created in the proposed Area Plan which is dedicated to habitat conservation in Los Osos. The policies and programs therein support the development of an HCP and the maximum protection of habitat resources under the law. Impacts are therefore less than significant.

5.8.3.2 Community-Specific Impacts

Significance thresholds presented in Section 5.8.2 have been used as a guide in determining potential impacts to biological resources resulting from specific projects within the Estero planning area. Proposed changes in land use may adversely affect the biological resources of the planning area. This impact analysis is focused on identifying impacts that may exceed significance thresholds and has been restricted to those cases where significant impacts will most likely occur despite the implementation of County-adopted development standards and avoidance measures discussed in Section 5.8.1.2.

Changes proposed in the updated Estero Area Plan would result in an increase in acreage within the Estero planning area and secondary study areas dedicated to Rural Lands, Recreation, Open Space, Residential Suburban, Residential Multi-Family, Commercial Retail, and Public Facilities. Implementation of the proposed land use category changes would result in a decrease in acreage in the Agriculture, Residential Rural, Residential Single Family, and Office and Professional land use categories. The biological impacts related to these proposed land use changes are discussed by areas and communities below.

a. Rural Area.

Special Policies, Programs & Standards

None specific to the Rural Area.
As part of the proposed Estero Area Plan, two parcels totaling 48 acres in the Agricultural category would be re-classified as Rural Lands. Twenty acres of Turri Road Public Facilities are reclassified as Agricultural and the 275-acre Agriculture-classified Estero Bay Properties parcel is reclassified as Open Space.

Two areas totaling 90 acres are removed from the Los Osos Urban Reserve Line and are added to Rural Estero in the Open Space designation. These two areas are the parcels that make up the Elfin Forest and a parcel of state-owned land west of Pecho Valley Road. Combined with the 275 acres of Agricultural lands converted to Open Space this yields a total of 366 acres reclassified as Open Space.

The loss of agricultural lands in terms of biological significance varies depending on what the agricultural land is replaced with, what habitat occurs in the surrounding vicinity, and how the land is currently being used (i.e., grazing, crops, orchards). Currently, within the Rural Area, the majority of land designated as Agriculture supports a mixture of irrigated and non-irrigated agricultural activities. Non-irrigated agriculture areas consist primarily of non-native grassland communities. Reclassification of agricultural land to open space will be beneficial in terms of protection of biological resources. Reclassification of agriculture to rural lands will not substantially change the density of potential development and will not, therefore, have a significant impact. Reclassification of public facilities land to agriculture will likewise be beneficial in terms of

potential impact to biological resources. Overall, impacts associated with proposed land use changes in the Rural Estero are considered less than significant.

b. Cayucos Area.

Special Policies, Programs & Standards

Refer to policies and standards under BR-1, above.

Implementation of the proposed Area Plan would result in reclassification of 10-acres of land designated as Agriculture to land classified as Residential Multi-Family and reclassification of 2-acres in the Recreation category to Residential Multi-Family and Commercial Retail. The loss of agricultural lands in terms of biological significance varies depending on what the agricultural land is replaced with, what habitat occurs in the surrounding vicinity, and how the land is currently being used (i.e., grazing, crops, orchards). The parcel in question is currently used for grazing, and is heavily disturbed. A large portion of the site exceeds 20 percent slope and will not be developable under County standards. However, the vegetation consists of nonnative grasslands, and will be replaced by intensive urban development. The surrounding land is largely developed, as it lies within the Cayucos Urban Reserve Line (URL), and is bordered on the north by Highway 1. Increased development associated with reclassification of agricultural lands to the Recreation category could result in an increase of impervious surfaces, and increased runoff. Adoption of the proposed Estero Area plan policies, programs, and standards associated with protection of sensitive biological resources, as well as identified mitigation measures, would likely reduce impacts to less than significant levels.

c. Cayucos Fringe Area.

Special Policies, Programs & Standards

None specific to the Cayucos Fringe. Refer to policies and standards under BR-1, above.

Development in the Cayucos Fringe Area would result in effects similar to those identified in the "Area-Wide Impacts" section. Major drainages with potential to be indirectly affected by increased development within the Cayucos Fringe Area include the upper reaches of Villa, Cayucos, and little Cayucos Creeks, as well as Cottontail Creek. If any indirect disturbance of these streams or their tributaries were to occur as a result of development activities, important habitat for a variety of special-status species, such as southern steelhead, California red-legged frog, and southwestern pond turtle could be adversely affected. In addition, potential habitat for tidewater goby located near the mouths of some of the coastal drainages could be adversely affected if sedimentation in the upper reaches were to occur as a result of development activities.

d. Los Osos Area.

Special Policies, Programs & Standards
NOTE: There are extensive policies and programs geared towards conservation and protection of biological resources in the proposed Area Plan. The following is not an all-inclusive list; the reader is referred to the proposed Area Plan for more information.

- Use an ecosystem approach whenever possible to preserve viable areas of sensitive habitat. Instead of focusing only on individual species, emphasize protection of highly sensitive biological communities supported by the Baywood fine sands, such as coastal sage scrub, dune scrub and maritime chaparral.
- Protect sensitive habitats by implementing a community-based transfer of development credits program, and concentrating or clustering development to protect sensitive species and contiguous areas of habitat (see Chapter 4 for full policy statements.)

- Mitigate impacts to sensitive habitat on the site of development so that contiguous areas of environmentally valuable habitat are preserved or restored. On smaller site where this aim can not be accomplished, give priority to using off-site mitigation as part of a mitigation banking or other program that preserves or restores contiguous areas of environmentally valuable habitat.
- Support efforts of conservation organizations to protect sensitive habitats by means such as acquiring land or purchasing development credits.
- Limit the spread of urban development
- Develop a Habitat Conservation Plan (HCP) or Natural Community Conservation Planning (NCCP) program that preserves sensitive habitat using an ecosystem approach, while easing the regulatory burden on private landowners. Involve the U.S. Fish and Wildlife Service, the DFG, landowners, and conservation organizations in this effort.
- Develop an areawide strategy to monitor development activity as it affects habitat, recognizing that habitat alteration occurs on a project-by-project basis, but may cause significant cumulative effects.
- Implement the recovery plan developed by the USFWS for the Morro shoulderband snail, Morro manzanita, and Indian Knob mountainbalm. Encourage participation by landowners and conservation organizations.

Impact Discussion

The acreage in the Los Osos urban reserve line decreases by 90 acres under the proposed plan.

Under the proposed plan, areas designated Recreation decrease by 36 acres, while areas designated for Open Space increase by 321 acres. Increases in open space are largely due to purchase of large properties in the area for habitat conservation. Several of these properties are located within the planned greenbelt around Los Osos. One property is the Sweet Springs marsh, a nature preserve open to the public. Deed restrictions placed on that property by the State of California prohibit any additional improvements. Another property contains wetlands and is located adjacent to Morro Bay, opposite the intersection of 3rd and Paso Robles Streets. Increases in open space under the proposed plan are considered beneficial.

In general, the proposed plan allows for an increase of over 1,700 dwelling units or more than 5,000 people, along with a number of roadway improvements. In addition, a new mixed-use area is established on several lots west of the central business district, south of Los Osos Valley Road. in an area commonly referred to as the Morro Shores. Land use categories of this 75-acre area are changed from Residential Single-Family (RSF), Residential Multi-Family (RMF), Commercial Retail (CR), and Office and Professional to a designation of RSF, RMF, CR, PF and Commercial Service (CS) that covers the entire mixed-use area.

The Los Osos Wastewater Project and Associated Mitigation Program

In response to the degradation to the community's water supply, the Regional Water Quality Control Board issued a cease and desist order in 1983 prohibiting any new development served by on-site septic systems within a portion of the Los Osos urban area (the Prohibition Zone). In 1988 the Board issued a building moratorium until such time as a community-wide wastewater system was in place. In response, the Los Osos Community Services District certified a final environmental impact report and approved a community wastewater collection, treatment and disposal system in 2000. Following completion of the wastewater system, it is expected that the Regional Board will lift the building moratorium and development of the community will proceed in accordance with the draft Area Plan.

A portion of the properties with remaining development potential within the Prohibition Zone contain habitat for federally endangered species including the Morro shoulderband snail. Construction of the Wastewater Project and the subsequent development of properties that may occur once the moratorium is lifted will result in direct and indirect impacts to special status species. Direct impacts will result from construction of the treatment plant, collection and disposal systems.

Because the Wastewater Project is funded by federal monies administered through the State Department of Water Resources, construction activities that would result in the direct loss of habitat for federally listed species will require the issuance of a permit in accordance with Section 7 of the Endangered Species Act. As mitigation for direct impacts associated with the Wastewater Project, the Los Osos CSD has purchased an 80 acre site located south of Highland Avenue west of Broderson Avenue (the Broderson property) which is part of the USFWS designated "Critical Habitat" for the Morro shoulderband snail. The Broderson property also contains sensitive habitat for other special status species. Through the preservation of this 80 acres the CSD has mitigated the direct impacts associated with construction of the Wastewater Project. The CSD has applied for a Section 7 permit from the USFWS based on this mitigation.

Indirect impacts to special status species will occur once the Wastewateer Project is completed as vacant and underutilized properties are developed in accordance with the draft Area Plan. The removal (or 'take') of this habitat will require the issuance of an Incidental Take permit in accordance with Section 10(a) of the Endangered Species Act. Section 10(a) requires the preparation of a Habitat Conservation Plan (HCP) to provide information supporting the issuance of an Incidental Take Permit and in particular to outline the steps to be taken to mitigate for the loss of habitat.

Since the incidental take of remaining habitat may only occur as a consequence of completion of the Los Osos Wastewater Project, the CSD has prepared an HCP to support the issuance of a Section 10(a) permit for the entire Los Osos urban area. Under this program, property owners contemplating development would have the following options: 1) participating in the LOHCP through the payment of a fee to the District or the County prior to building permit issuance, 2) pursuing their own Section 10 permit from the USF&WS, or 3) pursuing a waiver from the USFWS of Section 10 permit requirements. Accordingly, the objectives of the LOHCP are to:

- Authorize the issuance of a Section 10(a)(1)(A) permit by the USFWS to allow the incidental take of Covered Species within the Los Osos urban area as defined by the Estero Area Plan;
- Provide a community wide conservation program that addresses the requirements of federal, State and local regulatory agencies, including the USFWS, the Department of Fish and Game, the California Coastal Commission, and San Luis Obispo County;
- Reduce the likelihood of additional species located in Los Osos being listed as threatened or endangered;
- Provide Federal agencies and public land users streamlined review under Section 10 ESA;
- Aid in the conservation and recovery of listed species in San Luis Obispo County.
- Assist Federal, state and county land and wildlife managers.
- Provide a comprehensive and coordinated management plan for species and habitat that are impacted as a substitute for project-by-project evaluation and mitigation.
- Identify and evaluate the effectiveness of habitat management techniques over time and utilizing the Adaptive Management as set forth in the LOHCP.

Thus the HCP is being prepared as a community-wide, ecosystem based conservation program that affords property owners and regulating agencies a more efficient and comprehensive strategy to implement and comply with applicable laws relating to the protection of sensitive species.

~~Therefore, sewer mitigation includes the development of~~ Preparation of the LOHCP is a cooperative effort among the Coastal Commission, the County of San Luis Obispo, the U.S. Fish & Wildlife Service, the California Department of Fish & Game, and the Los Osos Community Services District.

~~The LOHCP prescribes the strategies, such as land acquisition, minimal development and restoration, to be employed now and in the future for the preservation of habitat necessary for the protection of endangered and threatened plant and animal species within the urban area of Los Osos and for the secondary impacts (residential and commercial development) of the project (and, development under the Area Plan).~~

The stated objectives can be achieved through implementation of these strategies in the LOHCP. Among the strategies recommended are:

- acquisition of development rights (by fee or easement) for properties containing habitat;
- management of a preserve through an exotic plant and animal species removal program;
- protection of habitat quality in the preserve through fire management, recreation, and educational program.

The proposed Area Plan contains a number of policies and programs aimed at the protection of sensitive resources in the planning area apart from the HCP, as listed under the Los Osos Dune Sands SRA, the Los Osos Greenbelt, Los Osos Habitat Conservation, and general community development standards. The proposed policies and standards are designed to complement the strategies provided in the HCP. The HCP offers a comprehensive strategy (but not the only strategy) for habitat protection in the Los Osos area. Specific development standards are provided throughout the plan aimed at the protection of habitat and ESHA in the Los Osos area. These specific development standards, including restrictions on allowable building areas, building setbacks, etcetera, are considered adequate in a General Plan document for resources protection and in addition will provide the foundation for the HCP.

In addition, ~~unprecedented~~ efforts are underway by a number of organizations dedicated to the preservation of these natural habitats. These groups include USFWS, CDFG, MEGA (Morro Estuary Greenbelt Alliance), the Land Conservancy of San Luis Obispo County, the Bay Foundation, Trust for Public Lands, and others. While these efforts cannot be included as part of the Area Plan activities, they have resulted in over 600 acres of land being put into conservation, thereby reducing the impacts to biological resources from activities proposed in the Area Plan.

Development in creekside areas of Los Osos is not expected to result in direct impacts to riparian vegetation associated with Los Osos Creek, provided that proposed riparian setback standards for the area are adopted (50 to 100 foot setbacks) and implemented (See project description). However, development within these areas are expected to result in increases of impervious surfaces in areas located adjacent to the Los Osos Creek corridor. Increased runoff from adjacent developed areas could then lead to increased levels of sedimentation and pollutants within Los Osos Creek and the estuary located downstream. Changes in water quality, through input of sediment or pollutants within the Los Osos Creek system, could result in a degradation of habitat for sensitive species including southern steelhead, tidewater goby, and California red-legged frog. Implementation of mitigation measures recommended in Section 5.8.3.3 for reducing runoff and sedimentation, as well as implementation of mitigation measures identified in Section 5.6 (Drainage & Water Quality) would reduce these impacts to sensitive aquatic habitats to less than significant levels.

e. Other Watershed Area.

Major drainages with potential to be indirectly affected by increased development within the Other Watershed Area include the upper reaches of Los Osos and Chorro Creeks, as well as their tributaries. If any indirect disturbance of these streams or their tributaries were to occur as a result of development activities, important habitat for a variety of special-status species, such as southern steelhead, California red-legged frog, and southwestern pond turtle could be adversely affected. In addition, any degradation of water quality within the Other Watershed Area could lead to disturbance of aquatic habitats of the Morro Bay Estuary and habitats for a wide-variety of important species that occupy the estuary.

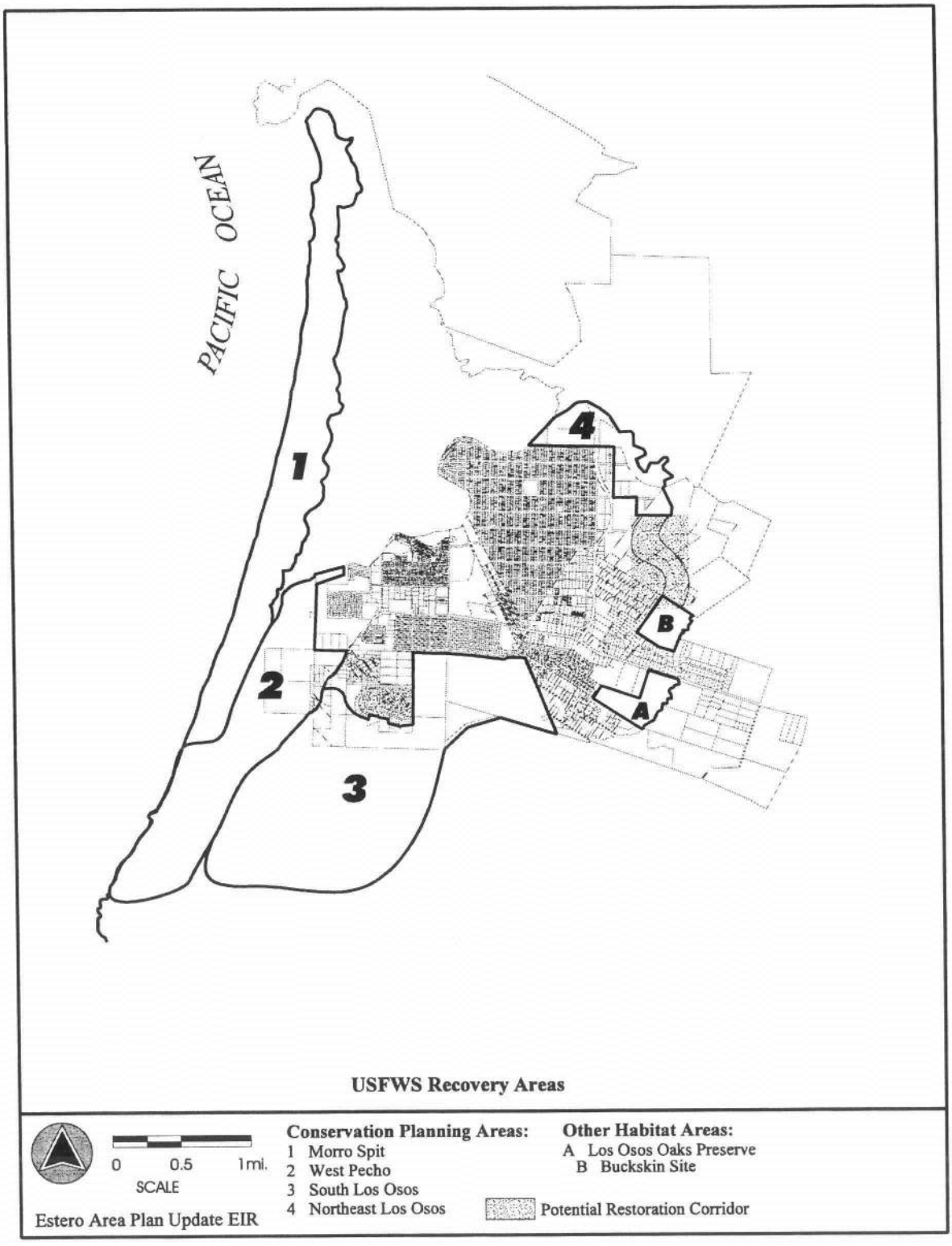


Figure 5.8-2 USFWS Recovery Areas.

5.8.3.3 Mitigation Measures

Mitigation measures to avoid and/or reduce significant impacts to biological resources can be implemented in several ways. Impacts to sensitive habitats and sensitive species should initially be avoided and/or greatly reduced through project design. Compliance with identified standards for specific habitats and local, state and federal regulations can also facilitate a reduction in potential impacts to sensitive habitats and species. In addition, associated permits issued by federal, state or local resource agencies for development projects typically contain conditions for protecting specific biological resources.

In General Plans and other large-scale planning documents, mitigation typically consists of policy language, in keeping with the level of detail of such documents. The reader should note that the following are typically required as part of County approvals for specific projects.

BR-1 Implement Sedimentation Reduction Measures. Implement drainage measures recommended in Section 5.6 to reduce potential downstream sedimentation impacts to insignificance.

BR-2 Tree Replacement. Oaks, sycamores and other native trees that cannot be avoided by development shall be replaced at a ratio and in a manner determined appropriate by the County.

BR-3 Plant/Animal Survey Procedures. Until such time that a County ordinance is adopted, surveys for endangered and sensitive plant and animal species shall be conducted during proper seasons and in accordance with standard technical methodologies. Appropriate mitigation measures in accordance with DFG guidelines shall be developed if necessary to reduce impacts of sensitive species to insignificance.

BR-4 Construction Activity Timing. Where sensitive species are known to occur within a proposed project area, timing of construction activities shall be barred from species breeding and/or migration seasons in order to minimize detrimental impacts. These limitations in construction timing are often included as provisions within associated permits. For example, construction activities occurring in or directly adjacent to a perennial stream such as Chorro Creek, may be limited to the summer months in order to minimize disturbance of steelhead spawning activities as part of a Section 1601 or 1603 CDFG streambed alteration agreement.

BR-5 Prepare and Submit a Revegetation Plan. For all development expected to result in removal or significant disturbance of natural vegetation, the applicant shall contact the Department of Planning and Building/Environmental Coordinator to determine their responsibilities in terms of revegetation and restoration. The plans shall be prepared by a qualified botanist, restoration specialist, or firm that is approved by the County. The plan shall address all natural communities impacted by all phases of the proposed project including central dune scrub, chaparral, annual grassland, and coastal scrub. The plan shall provide detailed specifications for replacement and restoration of all affected natural communities, including appropriate replacement ratios for disturbed native plants, and shall specify the duration and frequency of monitoring associated with revegetation/restoration efforts.

BR-6 Implement the pre-approved revegetation plan. Upon completion of construction for all new development, the applicant shall implement the pre-approved revegetation and restoration plan described above. Following completion of construction, immediately revegetate all areas previously containing natural vegetation and disturbed as a result of project implementation. Revegetate only with appropriate indigenous native vegetation. At a minimum, the structure and composition of habitats restored shall reflect pre-project site conditions or better. The health and maintenance of all replacement vegetation shall be monitored for a sufficient duration and frequency to ensure successful establishment of the vegetation.

BR-7 Control Further Introduction of Invasive Exotic Plants at New Development Sites. During and upon completion of construction, the project proponent shall be required to control further introduction of invasive exotic plants. To control further introduction of invasive exotic plants within areas disturbed by new construction activities, the project proponent shall implement the following measures.

- Use only clean fill material (free of weed seeds) within all construction zones.
- Prohibit planting or seeding disturbed portions of natural communities with non-native plant species.
- Control the establishment of invasive exotic weeds in all disturbed areas.

BR-8 Avoid Disturbance of Special-Status Plants at New Development Sites. During construction associated with all new development, avoid or minimize disturbance of special-status plants. Implement the measures identified below to avoid or minimize unnecessary disturbance of special-status plants either known or having potential to occur in the project area.

- Retain a qualified biologist to conduct focused surveys for special-status plant species during the appropriate flowering periods for various species having potential to occur in the project area.
- Clearly map and identify each individual or groups of special-status plants observed during the surveys with highly visible flagging, and then completely avoid during construction.
- In the event rare plants cannot be avoided during ground disturbance activities, applicable resource agencies should be contacted to determine appropriate avoidance measures prior to construction. Various measures may include relocation and transplanting of individual plants, and/or stockpiling of existing soils to retain the seedbank.

BR-9 Implement Erosion and Spill Control Measures during Construction. To reduce the potential for inadvertent release of sediment or fuel from construction areas to adjacent drainage and wetland areas, the following measures shall be implemented as part of all development projects.

- To the extent feasible, limit construction activities to the typical dry season to avoid indirect impacts to seasonal drainages and wetland habitats related to increased runoff and sedimentation from areas experiencing ground disturbance.
- During construction, avoid all cleaning and refueling of equipment and vehicles near existing drainages and associated seasonal wetland habitat.
- Following completion of construction-related activities, revegetate all disturbed and barren areas with appropriate native vegetation to reduce the risk of erosion and sedimentation in adjacent drainage areas.

BR-10 The County shall develop and revise current landscaping plan guidelines to include prohibition of the planting of invasive exotics designated by CNPS.

BR-11 Eliminate Proposed Density Increases in Areas of Endangered Species Habitat. At least two parcels in Los Osos are proposed for density increases (Cuesta Inlet area, and Sweet Springs area west of 4th Street). The known or presumed presence of endangered species (e.g. Morro shoulderband snail) indicates that these areas are not appropriate for density increases without considerable additional environmental analysis, including a comprehensive plan for mitigation as might be developed under the HCP.

5.8.4 Cumulative Impacts

Buildout within the Estero planning area and throughout the region would result in irreversible changes to biotic resources, because of the direct loss of portions of native plant communities and associated wildlife habitat. This may significantly impact important natural settings within the planning area and nearby communities, including habitats of sensitive plant and animal species. In addition, ongoing development within the Estero planning area could indirectly impact remaining sensitive communities due to further introduction of invasive exotic species and resulting degradation of associated habitats.

5.8.5 Residual Impacts

Continued growth in the Estero planning area will result in the loss of native habitats and agricultural lands to various forms of development proposed under the new land use categories. For the majority of the proposed changes, implementation of mitigation measures referred to above would reduce impacts to less than significant levels. Precise quantitative assessment of impacts to determine significance is limited primarily because site- specific development has not yet been proposed. Consequently, proposed mitigation measures are general and are directed at reducing impacts that can be identified at the General Plan level. Additional environmental review would be required as individual development projects or other proposed discretionary activities are reviewed by the County. The impact analysis and mitigation measures have been structured to provide a baseline against which later actions can be evaluated and refined. However, some loss of species and/or habitat will be unavoidable as vacant space is developed and roadways are improved. Therefore, the impacts to sensitive habitats and species from the land use designations and policies of the Estero Area Plan are considered significant and unavoidable (Class I), overall.

5.9 Agricultural Resources

This section describes the proposed Estero Area Plan's potential impacts to agricultural resources in the planning area, particularly with respect to the conversion of prime agricultural land.



5.9.1 Setting

5.9.1.1 Regional Setting

a. Current Agricultural Activity.
About 31,415 acres (74%) within the Estero planning area are designated for agricultural use, making Agriculture the largest single land use category. Crop patterns and agricultural practices vary; mixed vegetables and orchards are grown in the coastal valleys, while livestock grazing is the dominant practice in the hills and mountains.

The Estero planning area plays an important role in the county's agricultural economy. The rich alluvial soils associated with the area's coastal streams and valleys support high-value specialty crops such as citrus, avocados and seed flowers, in addition to row crops and hay for livestock feed.

b. Soils.
Within the Estero planning area, soil suitability for agriculture varies from *prime* to *poor*, as defined by the USDA Natural Resources Conservation Service (NRCS). Prime soils are those that possess the highest agricultural capabilities. The Division of Land Resource Protection (DLRP) is the State agency responsible for the monitoring and mapping of agricultural soils throughout the State. The DLRP is a division of the California Department of Conservation (DOC). The DLRP publishes a biannual Important Farmlands Map in association with its Farmland Mapping and Monitoring Program. Through this program important farmland is mapped based on criteria established by the federal government. The system also takes into account other factors such as distance to markets and responsiveness to irrigation. For purposes of this impact analysis, the definition of prime agricultural land will be that used by the DOC, which is the "Prime Irrigated Farmland" designation. Prime Irrigated Farmland is land that contains prime agricultural soils (designated Class I or II under the NRCS classification system) and a reliable water source. The "Local Potential Farmland," as used by DOC and designated on the Important Farmlands Map, is land that may also contain prime soils but is not currently irrigated or cultivated. These areas could be used to replace lost Prime Irrigated Farmland if a reliable water source could be developed.

Applying these definitions to farmland within the planning area reveals that there are about 3,000 acres of prime irrigated agricultural land within the planning area. As shown in Figure 5.9-1, these lands are primarily located primarily within the Los Osos and Chorro Valleys and Morro Valley.

c. Climate.
Along with soil quality, climate is an important factor in the suitability of an area for agriculture. The Estero planning area is characterized by a mild Mediterranean climate in which temperatures are moderated by the influence of the Pacific Ocean. During summer months, the marine cloud layer (fog) covers portions of the

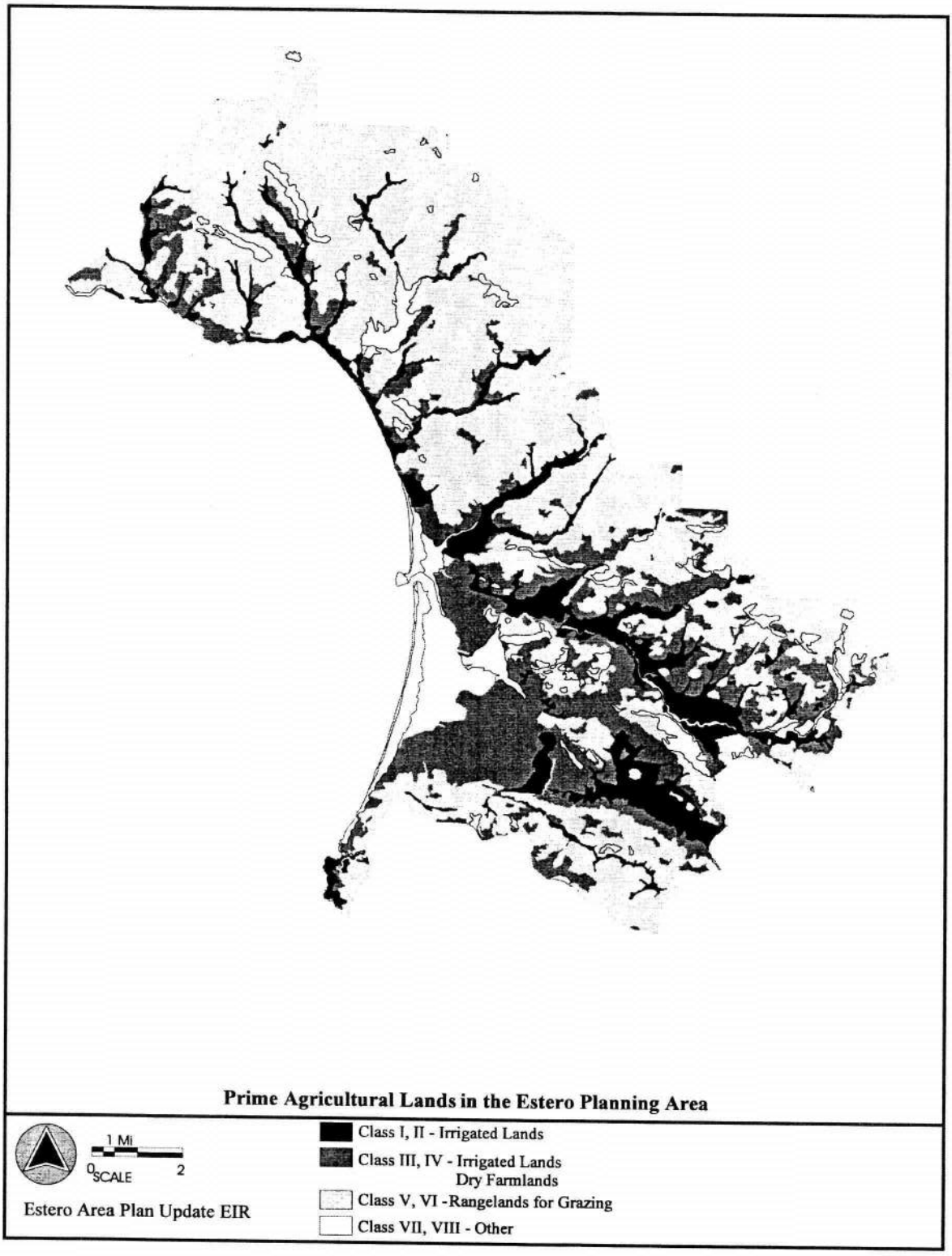


Figure 5.9-1: Prime Agricultural Land

planning area during the mornings and late afternoons, reducing temperatures and increasing relative humidity. Summertime highs occasionally range into the 80s (Fahrenheit) in the inland portions of the Los Osos and Chorro Valleys, with winter lows typically in the 40s (Fahrenheit). Weather systems are dominated by the Pacific High, a high pressure zone centered off the coast of California which diverts storm tracks northward during the summer. Average annual precipitation is 20 inches per year, falling primarily between October and April. Evaporation rates vary widely depending on soil type, solar aspect, vegetation, and cloud cover.

The Estero area has about 335 growing days per year. Frost is rare in the planning area, but sometimes occurs in the lowest portions of the coastal valleys.

5.9.1.2 Regulatory Setting

The California Coastal Act contains policies that favor the protection of agriculture and productive agricultural soils. Section 30241 states that the maximum amount of agricultural land shall be preserved by:

- Establishing stable urban/rural boundaries and buffer areas to minimize conflicts;
- Limiting the conversion of agricultural lands around the periphery of urban areas;
- Developing lands less suited for agricultural uses first;
- Providing the assurance that the expansion of public services and facilities and other non-agricultural development does not impair agricultural viability; and
- Providing the assurance that all divisions of prime agricultural lands and all development adjacent to prime agricultural lands shall not diminish the productivity of such prime agricultural lands.

Section 30242 states that all other lands suitable for agricultural use shall not be converted to non-agricultural uses unless: 1) continued or renewed agricultural use is not feasible, or 2) such conversion would preserve prime agricultural land or concentrate development consistent with Section 30250.

The **Coastal Policies** document provides guidance for the preservation of agriculture and implements the aforementioned provisions of the California Coastal Act. These policies favor the expansion of agriculture over other land uses to ensure that existing and potential agricultural viability is preserved.

The County's Coastal Zone Land Use Ordinance (CZLUO) establishes strict requirements for non-agricultural land uses in the Agriculture land use category. These requirements include:

- Minimizing the conversion of prime agricultural soils;
- Consideration of the compatibility of the proposed land use with nearby agricultural operations;
- Site design standards to help minimize conflicts;
- The prohibition of the extension of urban services to development or land divisions outside the urban services line (applies regardless of land use category), and
- A guarantee of continuing agricultural or open space use through easements.

In December, 1998, the Board of Supervisors adopted the **Agriculture and Open Space Element** of the General Plan which establishes goals, policies and programs aimed at the protection and enhancement of the County's agricultural and open space resources. The primary goals of the Element with regard to agriculture are:

- AG1: Support county agricultural production.
- AG2: Conserve agricultural resources.
- AG3: Protect agricultural lands.
- AG4: Encourage public education and participation.

Among the issues addressed by the Element are the proliferation of old legal lots, or "antiquated subdivisions" in agricultural areas that could legally support a single family dwelling, and the steadily increasing number of persons desiring to live in the rural (agricultural) portions of the county. Policies of the Agriculture and Open

Space Element seek to protect agricultural resources by concentrating urban development within existing urban areas and by establishing criteria whereby agriculture and limited non-agricultural development can co-exist with the least mutual disruption. The Element also establishes minimum parcel sizes for agricultural operations and seeks to implement a number of strategies to help preserve productive agricultural land. These strategies include a Transfer of Development Credits program, the clustering of development to promote viable agricultural parcel sizes, strengthening the LCA contract program, the purchase of development rights from antiquated subdivisions, and a requirement for buffers between agriculture and non-agricultural land uses.

An important tool for the preservation of important farmlands is the California **Land Conservation Act** (LCA) or Williamson Act contract program. Under the provisions of the Act, landowners may voluntarily enter into a long-term contract with cities or counties to form agricultural preserves and maintain their property in agriculture or open space in exchange for property tax reductions. The minimum term of land conservation contracts in San Luis Obispo County is 20 years. Properties located wholly or partly within 1 mile of an urban reserve line or adjacent to a village reserve line designated by the Land Use Element are eligible for a 10-year term[1]. Beginning in the eleventh year of a 20-year contract, a year is automatically added for each year that elapses to maintain an on-going 10-year term unless a notice of non-renewal is served. More than 50 percent of the agricultural land within San Luis Obispo County is subject to a land conservation contract[2].

Either party in the contract may request and be granted cancellation of an LCA contract only under extraordinary circumstances, as provided in the California LCA of 1965. Such circumstances include: 1) the cancellation is consistent with the purposes of the LCA; or 2) the cancellation is in the public interest[3]. The Rules of Procedure to Implement the California Land Conservation Act of 1965 for San Luis Obispo County includes a thorough explanation of this process. Figure 5.9-2 shows the parcels under the LCA program in the Estero planning area.

Table 5.9-1 provides a summary of land subject to a Land Conservation Act contract within the planning area.

Table 5.9-1: Summary of Lands Subject To LCA Contracts

Community	Number of Parcels Subject To LCA Contract	Acres
Rural Area	45	18,860
Los Osos	0	0
Cayucos	0	0
Other Watershed	21	4,319
Cayucos Fringe	54	20,618
TOTAL:	**120**	**43,797**

There are currently more than 43,000 acres within the Estero planning and secondary study areas under Williams Act contracts. The locations of these parcels are shown in Figure 5.9-2. The majority of these properties are under on-going contract with 10 or more years remaining. Several agricultural properties within the planning area are also under agricultural preserve but are not under LCA contracts. The owners of these properties are bound to agricultural land use through the agricultural land use designation rather than through LCA contract. Owners of these properties do not receive property tax reductions as they do under LCA contract. Property taxes are assessed at the current market value.

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1 San Luis Obispo County Department of Planning and Building, *Rules of Procedure to Implement The Land Conservation Act of 1965*, July 2, 1991.

2 San Luis Obispo County Department of Planning and Building, *Agriculture and Open Space Element*, 1998.

3 Barrett, Thomas S. and Putnam Livermore for The Trust for Public Land, *The Conservation Easement in California*, 1983.

Right to Farm Ordinance. Title 5 of the County Code is the Right to Farm Ordinance which requires disclosure statements between sellers and buyers at the time of property transfer. It also alerts the buyer to ongoing agricultural activities in the area and states that agriculture is a priority use of land in rural areas.

5.9.1.3 Community-Specific Setting

Agricultural resources within each sub-area of the Estero planning area are summarized below.

a. Rural Area.
Agriculture is the predominant land use in the rural area, which includes portions of the Los Osos Valley, Chorro Valley, Morro Valley and Little Morro Valley and the surrounding watersheds of Chorro and Los Osos Creeks. Agricultural lands currently comprise 31,415 acres, or about 80 percent of the total land area.[4] Mixed irrigated and dry farm croplands occupy most of the valley lowlands, while grazing predominates in hilly and mountainous areas. Because much of the rural area farmland produces grain and hay for livestock feed, these two uses are closely related. The lowland areas also include substantial acreage dedicated to row crops, orchards, and garbanzo beans.

An estimated 45 parcels totaling 18,860 acres in the rural area are currently under Williamson Act contracts. The majority of the rural area prime soils exist along the coastal stream valleys. In general, soil quality diminishes as distances from the stream valleys increases. Williamson Act parcels are shown on Figure 5.9-2.

b. Cayucos Area.
Agriculture is limited within the village of Cayucos. An approximate 10-acre parcel north of the Locarno Tract in the north end of the Cayucos urban area is included in the Agriculture land use category. This area is subject to an agricultural preserve (not under contract) that is a small piece of a large ranch holding covering most of the area north of Highway 1 between Cayucos and Villa Creek. The Estero Area Plan Update proposes to reclassify the 10-acre property from agriculture to residential multi-family to reflect the property's location within the Cayucos URL.

c. Cayucos Fringe Area.
The Cayucos Fringe area comprises the hinterland and watersheds of the Cayucos urban area. Agriculture in the Cayucos Fringe consists primarily of rangeland used for animal grazing. Small pockets of high-value commodity items such as avocados, citrus, peas, and tomatoes are grown in the coastal stream valleys where soils, climate and water availability are most favorable. There are approximately 29,600 acres of land in the Agriculture land use category in the Cayucos Fringe. An estimated 54 parcels totaling 20,618 acres are included in Williamson Act contracts.

d. Los Osos Area.
The Los Osos urban area does not have any land included in the Agriculture land use category, but the urban area is immediately adjacent to agricultural properties to the east. Within the fringe of the urban area, land use compatibility conflicts between agricultural and residential uses may arise.

e. Other Watershed Area.
In the upper watershed of Chorro Creek, agriculture is the primary land use, comprising 10,713 acres or 61 percent of the total acreage. Agricultural activities range from intensive row crops in Los Osos and Chorro Valleys to grazing land in the mountains. Approximately 21 parcels in the Other Watershed, totaling 4,319 acres, currently are within Williamson Act contracts.

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4 *Estero Area Plan Update*, Land Use, Public Hearing Draft, July 2003.

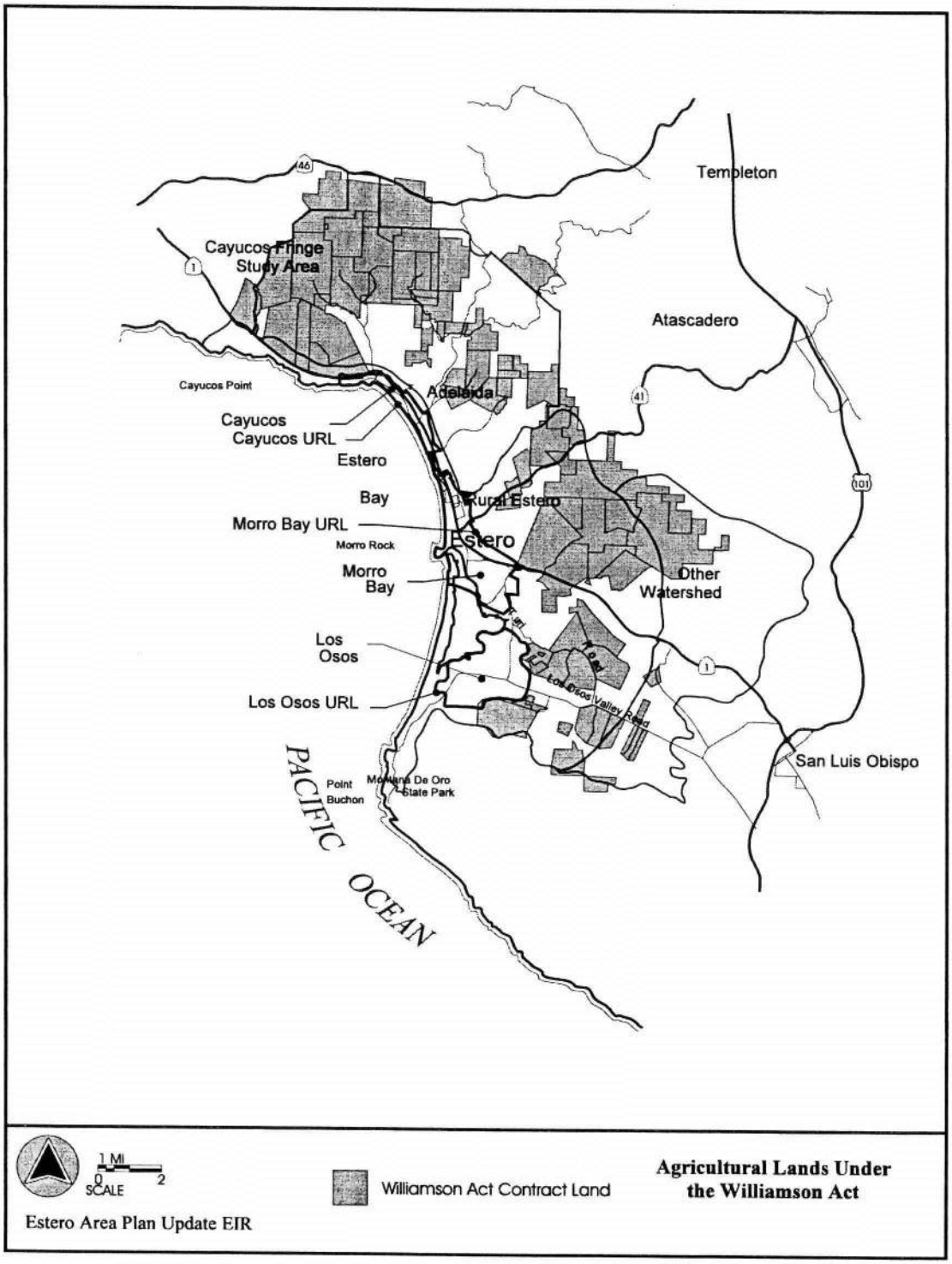


Figure 5.9-2 Agricultural Lands Under the Williamson Act (LCA) Contract and Agricultural Preserves.

5.9.2 Significance Thresholds

Agricultural impacts will be analyzed for consistency with CEQA guidelines to determine if an agricultural conversion activity will have a significant environmental impact. Agricultural conversion activity may also have a significant impact if it lies within the coastal zone and it is not consistent with sections 30241 and 30242 of the Coastal Act.

CEQA guidelines state that a impact will be significant if the activity would:

- convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use.
- conflict with existing zoning for agricultural use, or a Williamson Act contract.
- involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use.

5.9.3 Proposed Project Impact Analysis and Mitigation Measures

The urbanization of agricultural lands generally results in two types of impacts: Impacts resulting from the irreversible conversion of prime agricultural land to an urban land use, and impacts resulting from the conversion of a portion of a given land area that supports agricultural production to an urban land use, regardless of soil designation. Additionally, indirect or secondary impacts to agriculture may occur as the result of urban conflicts (usually residences) with adjacent agricultural lands.

5.9.3.1 Area-Wide Impacts

Impact AG-1: Changes in land uses proposed by the Estero Area Plan will result in the permanent conversion of 38 acres of agricultural land to a non-agricultural use.

The area designated for agricultural uses in the Estero planning area (including both rural and urban areas) would decrease from 31,729 acres to 31,415 acres under the proposed Area Plan, a reduction of about 314 acres. Table 5.9-2 summarizes the proposed changes to land designated for agricultural use within the Planning Area. The 267-acre Estero Bay Properties parcel is proposed for conversion to public ownership for conservation purposes. This change is not considered to be a permanent conversion to a non-agricultural use.

Forty-eight acres are proposed for re-classification to Rural Lands in two locations in the Rural Estero: 26 acres along Highway 41 at the Planning Area Boundary and 22 acres at the terminus of Clark Valley Road. The following items have been the major considerations in the re-classifications of these properties:

Highway 41:

1. Soils are Class VI; most are only moderately suitable for grazing
2. 26 acres is considered too small to support a grazing operations (the minimum parcel size for Class VI soils is 160 acres, and for existing grazing uses is 320 acres)
3. The acreage is part of a larger ownership, the remainder of which (300+ acres) are zoned Rural Lands in the Salinas River Planning Area
4. Considering the larger ownership, re-classification would not preclude grazing as it is an allowable use in RL
5. Only one extra parcel could be created on the entire ownership with this re-classification (minimum parcel size is 160 acres with ~~only~~ one to two residences allowed per parcel)
6. The re-classification would carry out the intent of the Board of Supervisors to zone the entire property RL as shown in the Salinas River Area Plan.

Clark Valley Road:

1. This is a 22-acre portion of a larger 425-acre ownership, the remainder of which is zoned RL
2. Soils are Class VII, which are poorly suited to rangeland
3. Topography is steep and the site (and the larger property) is wooded

A ten-acre portion of a larger agricultural tract is proposed for redesignation as Residential Multi-Family in Cayucos. This is a 10-acre portion of a 910-acre ownership, which is under a non-contracted agricultural preserve dating to 1974. The 10-acre portion was removed from the contract in 1997. The major considerations in the re-classification of this land are:

1. Approximately three of the ten acres are considered Class II if irrigated, and the remaining approximately six acres are considered Class VI. The land capability rating is therefore mostly Class VI, suitable for grazing. The three acres of potentially prime farmland is well below the minimum parcel sizes established for prime agricultural production. The property has only been used for limited seasonal grazing and has not been used for irrigated cropland. The property has not been irrigated.
2. Average slope is 20%, with a range of 0-60%.
3. This portion of the ownership is within the Cayucos URL and is adjacent to developed uses. Properties within urban areas are not appropriate for agricultural designation according to the Coastal Framework for Planning.
4. This portion of ownership is separated from the remainder by Highway 1 and steep slopes.

Due to the limited extent of *potentially* prime farmland on site and the historical use of the site for grazing only, the property is not considered prime farmland.

Table 5.9-2: Proposed Changes In Acres Designated for Agricultural Use

Sub-Area	Changes From Agriculture to Non-Agriculture	Changes From Non-Agriculture to Agriculture/Open Space	Net Change In Agriculture Acres
Rural	48 acres to Rural Lands 276 acres to Open Space (Estero Bay Properties)	20 acres from Public Facilities to AG	(304)
Cayucos	10 acres to Residential Multi-family	--	(10)
Los Osos	-	-	-
TOTAL	**(334)**	**20**	**(314)**

Special Policies, Programs & Standards Proposed by the Area Plan

Many of these provide mitigation to impacts that could result from development under the Estero Area Plan. **NOTE: subsequent modification or elimination of the policies cited in this section may modify the conclusions of this EIR.**

Policies of the Estero Area Plan update encourage the preservation of productive agricultural operations within the planning area, as summarized below.

Rural Area (General). Maintain and protect agriculture, through the use of incentives and the continuance of land use designations. Prevent further urban or suburban development, especially in areas of small rural lots. Avoid "leapfrog" development. Protect groundwater supplies for agriculture. Reject proposed general plan amendments to increase density or expand urban areas if resulting development would adversely affect ground water supplies, quality or recharge capability needed for agricultural uses.

Los Osos Valley (Rural Area). The plan supports the creation of a greenbelt around the community of Los Osos as a way to prevent sprawl onto the productive agricultural lands to the east. Promote high value crop and animal specialities on existing small parcels to help maintain the agricultural integrity of the area.

The Morros (Rural Area). Policies of the plan support the development of a consensus-based plan which preserves scenic vistas as well as agriculture.

Chorro, Morro and Little Morro Valleys (Rural Area). The plan supports continued agricultural use, retaining larger parcels for cropland and grazing uses while allowing plant and animal specialties on smaller parcels. The plan also discourages urban development outside the Morro Bay city limits, preferring instead the development of non-prime parcels within the city.

Northern Marine Terrace (Cayucos). The plan seeks to protect agriculture, open space and sensitive resources on the coastal terraces to the north and south of Cayucos.

The plan also supports the formation of a regional open space district or other entity to fund the acquisition of hillside lots north of Highway 1 in Cayucos as well as participation in a transfer of development credits (TDC) program that would allow development credits to be transferred away from these hillsides to more suitable areas. Open space areas often support dryland agricultural activities, such as grazing, and can create buffers for agricultural lands from developed areas.

In addition to these specific agriculture-related policies, the plan promotes the continued development of urban uses within urban areas as a way to protect agriculture and open space.

As discussed earlier, the Agriculture and Open Space Element provides policies and programs which are aimed at the protection of agriculture and open space. Specific selected policies of the Element are summarized below.

AGP 15. ***Transfer of Development Credits Program.*** *Continue to utilize a voluntary TDC program to help protect agricultural resources by guiding development to more suitable areas.*

AGP 17 ***Agriculture Buffers.*** *Protect land designated Agriculture and other lands in production agriculture by using natural or man-made buffers where adjacent to non-agricultural land uses in accordance with the agricultural buffer policies adopted by the Board of Supervisors.*

AGP 21 ***Minimum Parcel Size Criteria for the Division of Agricultural Lands.*** *Minimum parcel sizes for the proposed division of land designated Agriculture shall be based upon the existing and potential of the land for cropland and grazing. Minimum parcel size standards for the creation of new parcels shall be as shown in Figure 2-2 of the Agriculture and Open Space Element.*

AGP 22 ***Major Agricultural Cluster Projects (not in Coastal Zone).*** [Establishes design criteria for cluster development on agricultural lands.]

AGP 24 ***Conversion of Agricultural Land.*** [Establishes criteria aimed at discouraging the conversion of agricultural land to non-agriculture land uses.]

AGP 26 ***Streams and Riparian Corridors.*** [Establishes measures to protect the habitat qualities associated with streams and riparian corridors in agricultural and other areas.]

The proposed plan supports and incorporates the policies above by including TDC programs, protecting stream and riparian corridors, and discouraging conversion of agricultural land. The plan is therefore considered consistent with the Ag and Open Space Element.

Potential conversion of the land in question must also be analyzed for consistency with the Coastal Act. As mentioned in Section 5.9.1.3, Regulatory Setting, consistency can be determined through comparison of the plan with the following criteria:

~~Is the maximum amount of agricultural land preserved by:~~

- ~~Establishing stable urban/rural boundaries and buffer areas to minimize conflicts?~~

~~Area Plan Response: The proposed Estero Area Plan does not adjust the URL of Cayucos over present conditions. The boundary of the Rural Estero is modified to include public facilities at Camp San Luis and Cuesta College that are within the Coastal Zone and 90 acres of Open Space from the Los Osos URL but is otherwise unmodified. The Open Space removed from the Los Osos URL consists of the Elfin forest and state-owned land west of Pecho Road. The Los Osos URL is otherwise unchanged. The proposed plan supports the greenbelt efforts surrounding Los Osos, and tapers the density of development as one moves towards the rural areas to reduce conflict. The proposed plan is therefore considered consistent with the Coastal Act in this respect.~~

- ~~Limiting the conversion of agricultural lands around the periphery of urban areas?~~

~~Area Plan Response: The conversion of agricultural land under the proposed plan consists of reclassification of a parcel in the urban area of Cayucos, conversion of 276 acres to Open Space for conservation purposes, and conversion to Rural Lands, which are very low in density and have limited use. The plan does not convert agricultural lands at the edges of urban areas such that agricultural lands further from the urban center would feel increased pressure to develop. Conversion of the land in Cayucos is consistent with the development pattern on three sides of the parcel, and would not affect the remaining agricultural preserve. The plan is therefore consistent with the Coastal Act in this respect.~~

- ~~Developing lands less suited for agricultural uses first?~~

~~Area Plan Response: The proposed plan concentrates development in areas already developed, by encouraging infill in Los Osos and Cayucos through policy and land use designation. The plan is therefore consistent with the Coastal Act in this respect.~~

- ~~Providing the assurance that the expansion of public services and facilities and other non-agricultural development does not impair agricultural viability?~~

~~Area Plan Response: The plan does not specifically call for the expansion of public services or isolated pockets of new development that would impair the viability of surrounding agricultural areas. The plan is therefore consistent with the Coastal Act in this respect.~~

- ~~Providing the assurance that all divisions of prime agricultural lands and all development adjacent to prime agricultural lands shall not diminish the productivity of such prime agricultural lands?~~

~~Area Plan Response: None of the reclassifications of agricultural land to a developed use involve prime agricultural land. In general, the Estero Area exhibits intact areas of prime agricultural production with established land use patterns. The proposed plan does not substantially change this pattern. The plan is therefore considered consistent with the Coastal Act in this respect.~~

For all <u>non-prime farm</u> ~~other~~ lands in the Coastal Zone, is the land converted to non-agricultural use because:

- continued or renewed agricultural use infeasible, or
- conversion would preserve prime agricultural land or concentrate development consistent with Section 30250?

Area Plan Response:

Highway 41 Property. Redesignation of the property to RL to match the remainder of the ownership will not preclude continued use of the property for grazing. Conversion of the property would increase development potential by 1-2 dwelling units. This is considered consistent with the Coastal Act.

Clark Valley Road. The property on Clark Valley Road is not currently used for agriculture due to site constraints, namely topography and vegetation. Renewed agricultural use is therefore considered unlikely. Conversion of this property to RL would increase the development potential by 1-2 dwelling units. Conversion would not preclude agricultural use of the property if ever deemed feasible. Conversion of this property would allow some development on less valuable farmland in the area, effectively reducing the potential for conversions of prime farmland elsewhere. This is considered consistent with the Coastal Act.

Cayucos. The property in question in Cayucos is separated from the remaining ownership by significant developed infrastructure, and is proximate to urban development. The site exhibits constraints due to soil classification and slope, evidenced by use of the site for limited, seasonal grazing only. Continued use of the site for limited, seasonal grazing of the site may be feasible, and if irrigated, portions of the site might be used for limited cropland. However, conversion of this property would help reduce development pressure of prime and other farmland in the area, and would concentrate development within the existing urban reserve line. This is considered consistent with the Coastal Act.

The vast majority of agricultural land use category reclassification in the Estero Area is to Open Space. The public purchase of the 276-acre Estero Bay Properties for conservation purposes led to the need for the rezone to open space; this is not considered an impact to agricultural resources.

Overall, because the plan would not involve permanent loss of prime agricultural land, includes policies and programs aimed at the protection of agricultural resources, and would be consistent with other planning documents and the Coastal Act, impacts are considered less than significant.

5.9.3.2 Community-Wide Impacts

Refer to "Area-wide" discussion above.

5.9.3.3 Mitigation Measures

None required.

5.9.4 Cumulative Impacts

Cumulative impacts associated with conversion of agricultural lands within the planning area would result in the loss of approximately 38 acres of agricultural lands within the planning area (including Los Osos and Cayucos). The loss of agricultural soils that would occur upon the proposed Area Plan buildout would incrementally contribute to the loss of non-prime agricultural soils at the county- and state-wide levels, but do not rise to significance.

5.9.5 Residual Impact

The policies proposed in the Draft Area Plan, in conjunction with implementation of the policies and programs of the Agriculture and Open Space Element would serve to reduce the proposed Estero Area Plan's impact on agriculture and to reduce conflicts between agricultural and urban land uses to less than significant levels.

5.10 Aesthetics

This section discusses the potential impact to aesthetic amenities which may result from buildout under the Area Plan update. Specifically, it evaluates potential area-wide impacts and potential impacts to Rural Estero, Cayucos, the Cayucos Fringe, Los Osos, and the Other Watershed.

5.10.1 Setting

5.10.1.1 Area-Wide Setting

The planning area is located in San Luis Obispo County, a largely rural county on California's central coast. The county is a popular destination for visitors, in part due to its scenic variety and beauty. Different areas of the county contain scenery and vegetation reflecting the geography and climate of the region. Stands of pines in the north coastal portion of the County give way to oak-dotted grasslands, chaparral and sand dunes along the southern coast. Inland, livestock populates the grass-covered rolling hills, interrupted by farmland, vineyards, orchards and natural communities such as oak savannah and chaparral habitats. The diverse geologic features which characterize the County include forms of volcanic rock (most notable are the Morros extending from San Luis Obispo to Morro Bay), alluvial material washed into fertile valleys, and sand dunes.

The Estero Area has a primarily north/south orientation, extending along the Pacific Coast from Point Buchon to Point Estero. The level inland valley areas of Los Osos, Morro and Chorro Creeks are dedicated primarily to cultivated agriculture while hillside areas consist largely of rangelands. The planning area includes two unincorporated communities: Cayucos and Los Osos. Cayucos is located along Highway 1, the planning area's primary scenic corridor. Los Osos is located along Los Osos Valley Road and the community is part of the visible backdrop at the southern end of Morro Bay.

The steep Santa Lucia mountain range is the major physical barrier dividing the County into coastal and inland portions. It trends northwesterly to define the planning area's eastern boundary. The dark tones of the chaparral and oak woodlands that cover the slopes of the Santa Lucia Mountains provide contrast to the grasslands of the range's lower slopes. This area is sparsely developed, as the steep slopes, dense vegetative cover, and lack of extensive transportation, infrastructure, and public service networks have historically limited urbanization and agricultural activity.

5.10.1.2 Community-Specific Conditions

a. Rural Area.
Agricultural operations make up most of the rural portion of the Estero Area. Cattle-supporting irrigated pasture and dry farming operations dominate in hillside areas while row crops and dry farm grain dominate in the broad flat valleys of the southern portion of the plan area. Farmhouses and accessory structures contribute to the rural setting. Windrows, made up of eucalyptus and Monterey pine trees, provide verticality to the broad sloping hillsides and flat valleys.

b. Cayucos.
Cayucos is the northernmost community in the planning area, and lies on the coastal terrace closely bordered by steep hillsides on the north and east. The main commercial area of Cayucos is the central business district, including the pier area. The remainder of the town is characterized by one- and two-story homes with ocean view decks. Areas east of Highway 1 are characterized by a mix of newer homes, apartments, and vacant properties. Many homes throughout the community are used only on weekends or on a seasonal basis, although an increasing number of homes are permanent residences. From Highway 1, the Locarno Tract neighborhood at the northern end of Cayucos partially blocks views of the ocean.

Cayucos contains two state beaches: Morro Strand State Beach in the southern end of the community and Cayucos State Beach in the northern end. Both areas offer sandy beaches and limited facilities. A focal point of Cayucos Beach is the pier, which is a popular attraction with both residents and visitors.

c. Cayucos Fringe.

The Cayucos Fringe area, located inland from the Cayucos urban area, is a sparsely developed area characterized primarily by steeply sloped hillsides and intermittent drainages. Whale Rock Reservoir is located in the central portion of the Cayucos Fringe area. The area's steep slopes provide a scenic backdrop to the Cayucos Community.

d. Los Osos.

The community of Los Osos is at the western end of the Los Osos Valley. Commercial uses are concentrated in the central business district. This commercial core is ringed by single family and multi-family residential development of varying ages and densities. The Baywood Park neighborhood to the north is the largest and oldest of the area's residential neighborhoods, with some homes built in the late 1800's and a small commercial area. Los Osos also has several other neighborhoods, both older and newer.

e. Other Watershed Area.

The Other Watershed Area is defined by the Santa Lucia Range on the east, the Morro Creek watershed on the north, and the Irish Hills on the south. The area contains the Los Osos and Chorro Valleys, both of which drain westward to Morro Bay. Many residences are located near Los Osos and along major transportation routes, including Highway 1 and Los Osos Valley Road. Agricultural land uses are prevalent in both the Los Osos and Chorro Valleys. As previously discussed, the steep slopes of the Santa Lucia Range provide a scenic backdrop to the valley areas of the southern portion of the Estero Area.

5.10.1.3 Primary Viewing Corridors

Principal travel corridors are important to an analysis of aesthetic features because they define the vantage point for the largest number of viewers. This section describes the primary travel (viewing) corridors within the planning area. The Estero Area includes three important viewing corridors: Highway 1, Highway 41, and Los Osos Valley Road. Each of these corridors is described below.

a. Highway 1.

Highway 1 (the Pacific Coast Highway) is the most important transportation feature and travel route within the planning area. The highway, which traverses the planning area, is designated within the California Coastal Plan as a visually scenic corridor to be protected and is designated a State Scenic Highway. Highway 1 offers many scenic views to the traveler. Southeast of Morro Bay, travelers can view the agricultural and pasture lands of the Chorro Creek Valley, the Morros including Hollister Peak, and the Santa Lucia Mountains. North of Morro Bay, the highway offers striking views of the shoreline and ocean, as well as expansive views of the Santa Lucia Mountains. North of Cayucos, Highway 1 runs along the coastal terrace and offers unobstructed views of the shoreline. A point of particular interest is Morro Rock, a state historic landmark just north of Morro Bay that can be seen from Highway 1.

b. Highway 41.

Highway 41 is the east/west travel corridor linking Morro Bay to Highway 101 and the inland communities of Atascadero and Paso Robles. It enters the Estero Area through the Santa Lucia Mountains, offering dramatic vistas of the range's ridges and valleys before descending into the broad agricultural valley of Morro Creek. The highway terminates at its junction with Highway 1, just north of Morro Bay.

c. Los Osos Valley Road.
Los Osos Valley Road slices through the center of the largely agricultural Los Osos Valley. The road affords views of the broad agricultural flatlands of the valley, as well as the Irish Hills to the south.

5.10.1.4 Regulatory Setting

The primary County policy documents which govern aesthetic issues in the Estero Area are the Coastal Zone Framework for Planning, Coastal Plan Policies Document, and the Agriculture and Open Space Element of the County General Plan. The California Coastal Act of 1976 sets forth policies for the protection, maintenance, and enhancement of the California coast.

a. California Coastal Act of 1976.
The California Coastal Act of 1976 was intended to protect a range of coastal resources. Section 30251 of the act specifically addresses the preservation of scenic and visual qualities:

"The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, and, where feasible, to restore and enhance visual quality in visually degraded areas."

The Coastal Act emphasizes the protection of ocean and coastal views from public areas such as highways, roads, beaches, parks, coastal trails and accessways, vista points, and other public vistas. The Act designates Highway 1 as the most important coastal scenic highway in the state, requiring that the highway remain a two-lane road in rural areas. Turn-outs, coastal access, and other improvements designed to increase travelers' opportunities to enjoy the shoreline are also recommended for inclusion in the Local Coastal Program. The special status of Highway 1 within the state's plan and its designation as a scenic highway mandates that the County protect the views from Highway 1.

b. Coastal Plan Policies Document.
The Coastal Plan Policies Document is part of the Land Use Element/Local Coastal Plan (LUE/LCP). It contains policies that have been incorporated into the LUE/LCP as standards or policies. The Coastal Plan Policies Document sets forth a number of policies related to the preservation of visual and scenic resources, including the following:

- protection of visual and scenic resources;
- site selection for new development;
- stringline method for siting new development;
- new development in rural areas;
- landform alterations;
- special communities and small-scale neighborhoods;
- preservation of trees and native vegetation;
- utility lines within view corridors;
- signs;
- development on beaches and sand dunes; and
- development on coastal bluffs.

c. Coastal Zone Framework for Planning.
The Framework for Planning document of the Land Use Element/Local Coastal Plan contains baseline information and policies that are further refined and applied through the area plans. The Framework for Planning also contains information pertaining to visual and scenic resources, including circulation design considerations, allowable uses within land use categories, and the combining designations program description and definitions.

d. Coastal Zone Land Use Ordinance (CZLUO)

The CZLUO contains a number of standards designed to protect visual resources in the Coastal Zone. The following standards have been proposed and if adopted would apply within Critical Viewsheds, Scenic Corridors and SRA's that are intended to protect visual resources as identified in the area plans of the Local Coastal Plan:

1. Applicability. The following standards apply to proposed land divisions and residential and residential accessory structures (including water tanks), agricultural and agricultural accessory structures, commercial structures, pipelines and transmission lines, public utility facilities, communications facilities, and access roads that are required by the Coastal Zone Land Use Ordinance to have a land use permit, except that the following are exempt from some or all of these standards:

- **Agricultural accessory structures that are 600 square feet or less in area.**

- **Project not visible.** An exemption from following standards 3a., b., d., and e. may be granted if documentation is provided demonstrating that the proposed structures and access roads will not be visible from any of the roads specified in the applicable area plan planning area standards for Critical Viewsheds, Scenic Corridors or SRA's that are intended to protect visual resources. Such documentation shall at a minimum provide topographic and building elevations with preliminary grading and building plans. An exemption from standard 3f may be granted in the preceding documentation is provided, and if the Critical Viewshed or SRA is not also intended to protect sensitive habitat or watershed, as identified in the area plans.

2. Permit Requirement. Minor Use Permit approval, unless Development Plan approval is otherwise required by this plan or the Coastal Zone Land Use Ordinance. The land use permit or land division application shall include the following:

- A landscaping plan and a visual analysis that is prepared by a licensed architect, a licensed landscape architect or other qualified person acceptable to the Director of Planning and Building. The landscaping plan and visual analysis shall be used to determine compliance with the following standards.

3. Standards for Critical Viewsheds and SRAs to Protect Visual Resources. The following standards apply within areas identified as Critical Viewsheds or SRAs in the area plans for protection of visual resources.

- **Locations of Development.** Locate development, including accessory structures, water tanks and access roads, in the least visible portion of the site as viewed from any of the applicable roads or highways described in planning area standards in the area plans, consistent with protection of other resources. Alternative locations may be approved where visual effects are reduced to an insignificant level. Use topographic features first and vegetation second to screen development from public view.

- **Building Visibility.** Minimize building height and mass by using low-profile design where applicable, including partially sinking structures below grade. Minimize the visibility of buildings, including water tanks, by using colors to harmonize with the surrounding environment.

- **Ridgetop Development.** Locate structures so that they are not silhouetted against the sky as viewed from public roads or the Morro Bay estuary, unless compliance with this standard is infeasible or results in more environmental damage than an alternative.

- **Landscaping for Hillside and Ridgetop Development.** Provide at least 80 percent screening of structures at plant maturity using native or drought-tolerant vegetation (no invasive species), but without obstructing major public views. Maximize use of evergreen trees and large-growing shrubs that have shapes similar to existing native vegetation. Alternatives to such screening may be approved if visual effects are otherwise reduced to an insignificant level through use of topographic features or design of structures. Provisions shall be made to maintain and guarantee the survival of required landscape screening for a period of five years.

- **Residential Land Divisions - Cluster Requirement.** Residential land divisions and their building sites shall be clustered in accordance with Chapter 23.04 or otherwise concentrated in order to protect the visual resources as identified in the area plans of the Local Coastal Plan.

- **Open Space Preservation.** Pursuant to the purpose of the Critical Viewshed or SRA to protect significant visual resources, open space preservation is a compatible measure to support the approval of new development. Approval of an application for any land division, Minor Use Permit or Development Plan (excluding any agricultural accessory building) is contingent upon the applicant executing an agreement with the county to maintain in open space use appropriate portions of the site within the Scenic Backdrop that is not intended for development. Guarantee of open space preservation may be in the form of public purchase, agreements, easements controls or other appropriate instrument, provided that such guarantee agreements are not to grant public access unless acceptable to the property owner.

4. Standards for Scenic Corridors. The following standards apply within areas identified as Scenic Corridors in the area plans for protection of visual resources.

- **Setback.** Where possible, residential buildings, residential accessory structures and agricultural accessory structures shall be set back 100 feet from the right-of-way of the road along which the Scenic Corridor is established in the area plans, or a distance as otherwise specified in the area plan planning area standards. If there is no feasible development area outside of this setback, the project shall be located on the rear half of the property and shall provide a landscaping screen of moderately fast-growing, drought-tolerant plant material to provide 80 percent view coverage at plant maturity. A landscaping plan per the Coastal Zone Land Use Ordinance shall be provided at the time of building permit application submittal.

- **Signs.** Locate signs that are required to have a land use permit, especially freestanding signs, so that they do not interfere with vistas from the road along which the Scenic Corridor is established in the area plans.

The preceding text is proposed as an amendment to the CZLUO; it has not yet been finalized or adopted and therefore cannot be considered mitigation in this EIR. However, it provides context regarding the County's plans for preservation of important visual resources. If adopted the preceding text will apply throughout the Estero Area.

e. Agriculture and Open Space Element.

The Agriculture and Open Space Element includes policies regarding establishment of scenic corridors and development within these corridors. In addition, numerous policies aimed at protecting natural resources may have the indirect effect of protecting visual resources, as the two are closely related.

The Agriculture and Open Space Element recommends studying the following roads and highways to determine if and where scenic corridors should be designated (OSP 24):

- Highway 1 (within the Estero planning area and Other Watershed)
- Highway 41 (within the Estero planning area)
- Los Osos Valley Road between Clark Valley Road and Foothill Boulevard (within a portion of the Estero planning area and Other Watershed)
- South Bay Boulevard from Santa Ysabel Avenue to Highway 1

OSP 25 contains policies to protect scenic vistas within scenic corridors through location of structures, grading, screening and design and placement of signs in discretionary development and land divisions.

f. California Environmental Quality Act (CEQA).
Section 21084(b) of CEQA prohibits categorical exemptions for projects adjacent to state designated scenic highways, such as Highway One.

5.10.2 Significance Thresholds

Determination of Significance

The CEQA Guidelines state that a project will normally have a significant effect on the environment if it will "conflict with adopted environmental plans and goals of the community where it is located". Therefore, the project is considered to result in a significant aesthetic impact if it conflicts with the visual resource goals, policies and guidelines outlined in the California Coastal Act, the Coastal Zone Framework for Planning, the Coastal Plan Policies document, the CZLUO, or the Agriculture and Open Space Element of the County General Plan.

In addition, Section 15382 of CEQA specifically addresses visual impacts. According to section 15382, an effect on an environment is considered to be significant if it is a substantial, or potentially substantial adverse change in any of the physical conditions, including objects of aesthetic significance, within the area being studied. The CEQA Guidelines further define a project as having a significant visual effect on the environment if it would have a "substantial, demonstrable, negative aesthetic effect."

Visual impacts would be considered to be significant if:

- The proposed project is highly visible from a primary viewing corridor; and/or
- The proposed project results in a substantial decrease in the visual or scenic quality of an area.

High visibility from a primary viewing corridor (Highway 1, Highway 41 or Los Osos Valley Road) results in a significant impact because of high viewer exposure and high viewer sensitivity (see Table 5.10-1). High viewer exposure occurs because a large number of people experience the view as they use a roadway; while high viewer sensitivity occurs because of the scenic roadway designation (in the case of Highway 1) and the high proportion of recreational oriented users (in the case of Highways 41 and Los Osos Valley Road).

The aesthetic evaluation procedures established in the Visual Resource Management (VRM) system developed by Federal Highway Administration (FHWA, 1981) are used in the impact assessment which follows. In the VRM system, the full range of resource change is divided into thirds, which are labeled low, moderate and high in terms of potential impact. In the case of the visibility analysis, some areas were not visible from any of the viewpoints, while the most visible of the areas were visible from a maximum of 18 of the viewpoints. When the range is divided into thirds, the result is that areas seen from 12 or more of the viewpoints are considered to be highly visible, and would therefore be significantly impacted by a proposed project (see Table 5.10-1).

Lowered visual quality at the site results in a significant impact because the planning area lies within an area protected by the Coastal Act. Again, the VRM system was used in the impact assessment which follows. In the VRM system, impacts are assessed by comparing the visual quality before the proposed project to the likely visual

quality after the proposed project. The level of visual quality can increase, remain the same, or decrease. In the VRM system, a significant decrease in visual quality occurs when the visual quality of an area is reduced from high to moderate or low, or is reduced from moderate to low (see Table 5.10-1).

Table 5.10-1: Significance Thresholds for Visibility and Visual Quality

Visibility	Low	Visible from 0-6 of the viewpoints	
	Moderate	Visible from 7-11 of the viewpoints	
	High	Visible from 12-18 of the viewpoints	
Level of Visual Quality	**Direction of Change**	**Visual Quality Before**	**Visual Quality After**
	Increase	Low	Moderate or High
		Moderate	High
	No Change	Low	Low
		Moderate	Moderate
		High	High
	Decrease	Moderate	Low
		High	Low or Moderate
Source: Jones & Jones, *Esthetics and Visual Resource Management for Highways*, October 1977.			

Aesthetic/Visual Resource Evaluation Criteria

The following visual assessment criteria are from the Visual Resource Management (VRM) system developed by Federal Highway Administration (FHWA, 1981). The VRM system was selected for the visual impact assessment because it provides reliable estimates of the visual quality of both urban and rural environments. The VRM system recognizes that both viewer sensitivity and visual quality are important determinants of visual impacts.

In the VRM system, visual character and visual quality are assessed to provide a measure of resource change. This measure is combined with viewer response (a combination of viewer exposure and viewer sensitivity) to estimate the visual impact of proposed land use changes (see Figure 5.10-1).

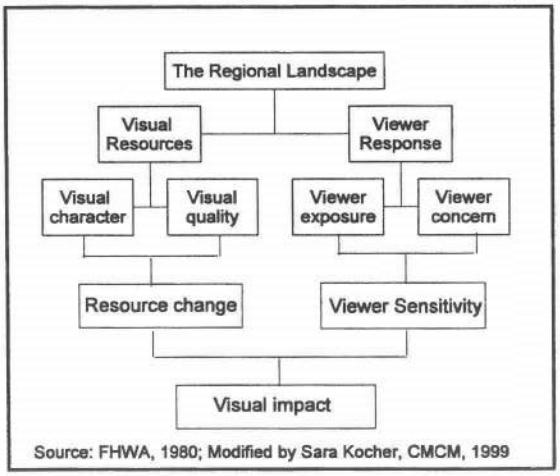


Figure 5.10-1: Visual Impact Flowchart

Viewer Sensitivity. The viewer response to a site is based upon viewer exposure and viewer concern. Viewer exposure includes the visibility of a site and number of people viewing the site, while viewer concern is based on viewer activity (such as commuters versus tourists) and expectations. Viewer sensitivity was assessed in the constraints analysis prepared for the Estero Area Plan Update (December, 1994). To determine the visibility of areas within the Estero planning area, as well as the Cayucos Fringe and Other Watershed, 23 points were chosen along Highways 1 and 41 and Los Osos Valley Road (refer to Appendix 5.10). The roads and viewpoints

were chosen to maximize the likelihood of high viewer concern since these roadways are primary viewing corridors. The visible portions of the study area from each of these chosen viewpoints were identified using GIS and were plotted on a map. Although 23 viewpoints were selected for the analysis, the most visible areas were visible from a maximum of 18 viewpoints. Areas ranged from low to high in terms of viewer sensitivity based on the following criteria:

- Low sensitivity: not visible or visible from less than four viewpoints along a primary viewing corridor,
- Moderate sensitivity: visible from 4-11 viewpoints along a primary viewing corridor, and
- High sensitivity: visible from 12 to 18 viewpoints along a primary viewing corridor.

Resource Change. Resource change is assessed through comparing the existing character and visual quality of the site to estimates of post project conditions. Existing visual character is established through a description of current conditions of land, water, vegetation, and human made features at the site. The visual character of the proposed project or alternative is established through describing the general type and density of development that would be allowed at the site, along with the expected changes in land, water and vegetation that would be likely in the event of site development.

Visual quality is established by evaluating the site in terms of vividness, intactness and unity (see Table 5.10-2) in its existing and proposed condition. A comparison of these ratings provides a measure of resource change. The visual quality assessment consists of assigning a rating ranging from 1 to 7 for each of the evaluative dimensions (vividness, intactness and unity). In the VRM system, an average rating of 6 or 7 on the 7 point scale indicates high visual quality, a 3, 4 or 5 indicates moderate visual quality, and a 1or 2 indicates low visual quality. The average rating of the area as it currently exists is compared to the average rating of the area post project and this comparison is the measure of resource change. In the VRM system, a significant decrease in visual quality occurs when the visual quality of an area is reduced from high to moderate or low, or is reduced from moderate to low.

Table 5.10-2: Visual Quality

Concept	Definition
Vividness	The memorability of landscape components as they combine in striking and distinctive visual patterns.
Intactness	The visual integrity of the natural and human built landscape, and its freedom from encroaching elements. Essentially a measure of blight.
Unity	The visual coherence and compositional harmony of the landscape considered as a whole.
Source: Jones & Jones, *Esthetics and Visual Resource Management for Highways*, October 1977.	

Visual Impact. In the VRM, the extent of a visual impact is based both on the extent of the resource change and the viewer sensitivity. In view of the fact that the Coastal Act recognizes the importance of maintaining visual quality in coastal areas, the following visual impact criteria were adopted as impact significance thresholds:

- The proposed project is highly visible from a primary viewing corridor; and/or
- The proposed project results in a substantial decrease in the visual or scenic quality of an area.

5.10.3 Proposed Project Impacts and Mitigation Measures

5.10.3.1 Area-Wide Impacts

Impact AES-1: Potential visual quality impact from development under the Area Plan update, which would result in additional development in the planning area.

Special Policies, Programs and Standards
Many of these provide mitigation to impacts that could result from development under the Estero Area Plan. **NOTE: subsequent modification or elimination of the policies cited in this section may modify the conclusions of this EIR.**

Sensitive Resource Area (SRA). The following sensitive resource areas identify a variety of important natural resources. The SRAs include vistas to and along the coast and help assure public access to the coast. They also include many ecologically important areas, such as wetlands, marshes, sand dunes (beaches), natural plant communities, habitat for rare and endangered plants and animals, and sensitive watershed. Also included are scenic backdrops and natural landmarks of outstanding visual significance that help define the character of the area. The SRA standards in this plan are consistent with and help implement the policies of the Framework for Planning and Coastal Plan Policies.

Every year, residents and visitors make millions of vehicle trips on roads and highways that pass in view of highly scenic areas such as Morro Bay estuary, the Morros, the coastline, and coastal hills. Many of those trips are made by tourists who make a significant contribution to the local economy. The scenic views of these areas and their ecological function should be maintained in order to help make this area a desirable place to live and visit.

The Morros, Including Cerro Cabrillo, Hollister Peak and Associated Hills (SRA). These unique volcanic peaks stretch from San Luis Obispo to Morro Bay and separate the Chorro and Los Osos Valleys. This chain of peaks form spectacular scenic backdrops and natural landmarks that rise above the valley floor and help define the character of the area.

The SRA covers Cerro Cabrillo, Hollister Peak and associated hills from the tops of these peaks, hills and connecting ridges down to the 300-foot elevation. These areas correspond to the visually prominent peaks and backdrops that are visible from Highway 1, Los Osos Valley Road, Turri Road and South Bay Boulevard. The SRA standards in this plan are intended to protect scenic vistas from those roads.

Highway 1 - Cayucos Viewshed (~~SRA~~)Critical Viewshed. This ~~SRA~~ Critical Viewshed covers areas inland of and generally visible from Highway 1, between the highway and the first prominent ridgeline or ridgetop approximately between Toro Creek Road and Villa Creek. These steep, open hillsides are bisected by narrow valleys and provide a scenic backdrop to views of the bay and coastline. The primary purpose of this ~~SRA~~ Critical Viewshed is to protect scenic views that help define the character of this area.

This SRA includes most of the Cayucos hillsides--the relatively small, subdivided lots in the Morro Rock View and Morro Strand subdivisions situated above Cayucos and outside of the Cayucos urban reserve line. There are numerous legal lots in that area that have the potential to be developed. Accordingly, the SRA standards are not intended to keep those hillsides pristine or deter development. Instead, the standards will help assure that the visual effects of any development will be minimized through the siting and design of roads, grading and structures.

Ocean Shoreline (SRA). These highly scenic and sensitive, largely undeveloped ocean shoreline areas include the coastal terraces and shoreline between Point Estero and Cayucos, between Cayucos and the City of Morro

Bay and along Montana de Oro State Park. Also included is the Morro Bay Sand Spit. Concerns include maintaining open views of the shoreline and ocean from Highway 1, providing public recreation areas, and maintaining maximum public access to the immediate shoreline. Among the areas included in this SRA is the entire coastal terrace on the ocean side of Highway 1 extending from the Cayucos urban reserve line west to the planning area boundary. The primary purpose of the SRA standards for that area is to protect views of the shoreline, bay and ocean, and to protect marine mammals and sensitive plants.

Morro Bay Shoreline (SRA). The Morro Bay tidelands and adjoining shoreline areas are important to the ecology of the bay, and are also highly scenic. Marshlands are particularly important as a source of food and refuge for marine life and also provide feeding and nesting areas for a variety of waterfowl and shorebirds. Critical areas include the following:

..

- Sweet Springs and Cuesta-by-the-Sea Marsh (SRA). Cuesta-by-the-Sea Marsh is a saltwater marsh adjacent to the Cuesta-by-the-Sea neighborhood. Sweet Springs marsh is an unusual combination of a tidal salt marsh and a freshwater spring. Both are adjacent to (and flow into) Morro Bay. These areas are used as a feeding and resting area by many species of shorebirds and waterfowl.

- Los Osos Estuary (SRA). This is a small estuary off Morro Bay at the mouth of Los Osos Creek near South Bay Boulevard. Biotic communities represented here are a freshwater marsh, a salt water marsh, coastal scrub, and an estuarine community. The area provides habitat for many species of mammals, birds and fish, including endangered species.

- Baywood Peninsula. 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.

- Fairbanks Property. Since 1948, an important nesting and resting site for herons has been located on this site near the marina and adjacent to Morro Bay State Park.

- **Other SRAs that serve to protect visual values in the area:** Morro Bay Estuary, Hazard Canyon, Coon Creek, Los Osos Oaks State Reserve, Los Osos Creek, Eto and Warden Lakes, Whale Rock Reservoir Watershed.[1]

Impact Discussion

In a general sense, development under the Area Plan update would result in a population and employment increase in the planning area. The entire planning area will experience increased tourist and commuter traffic, which will cause more people to be exposed to the visual amenities of the area. This pattern of development would contribute to an increasing viewer sensitivity within the planning area. Impacts to the overall character of the area could be potentially significant as a result. However, proposed Area Plan policies (such as the protection of the Sensitive Resource Areas) would mitigate the potential impact of development to some degree. Potential impacts to specific communities and viewing corridors are analyzed in the following section. For further discussion of area-wide impacts, please refer to the section describing cumulative impacts (Section 5.10.2.5).

5.10.3.2 Community-Specific Impacts

In order to assess the visual quality impacts of the proposed plan, tables of proposed changes in the Draft Estero Area Plan were reviewed for Rural Estero, Cayucos and Los Osos. Areas in which the proposed change was likely to reduce visual quality were mapped and evaluated. These areas are discussed below.

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1 *Estero Area Plan Update. Environmental, Cultural Resources.* San Luis Obispo County, July 2003.

a. Rural Area.

The proposed changes identified in the Estero Area Plan for the rural area are not expected to impact the visual quality of the area. Under the proposed plan, additional policies would be implemented in this area to protect visual quality, as described above under area wide impacts.

b. Cayucos Area.

Two of the proposed changes identified in the Estero Area Plan could potentially impact the visual quality of the Cayucos area. The two changes involve 1) a land use designation change from Agriculture to Residential Multi-Family and 2) a land use change from Recreation to Residential Multi-Family/Commercial Retail (see Figure 5.10-2).

Impact AES-2:Potential visual quality impact from development of land ~~use~~ following a change of designation ~~change~~ from agriculture to Residential Multi-Family.

Special Policies, Programs and Standards

- Hillside Areas GSA. Many of the hillsides in the planning area are subject to high landslide risk, as identified in the Safety Element of the general plan. Of particular note are the hillsides above Morro Bay and Cayucos.[2]

Impact Discussion

The land use designation change from Agriculture to Residential Multi-Family occurs on a property at the north end of Cayucos between North Ocean Avenue and Highway 1. The area slopes toward the ocean and is visible from Highway 1. The site is also visible from the ocean. The vegetation at the site consists primarily of annual non-native grasses. Adjacent properties include a vacant industrial building and a mobile home park. Allowable uses could include either Multi-family units, Single-family units, Passive Recreation, and Schools (Section 3.0 Project Description). The site is not considered to be highly visible from a primary viewing corridor, since it is visible from less than 4 of the 23 viewpoints.

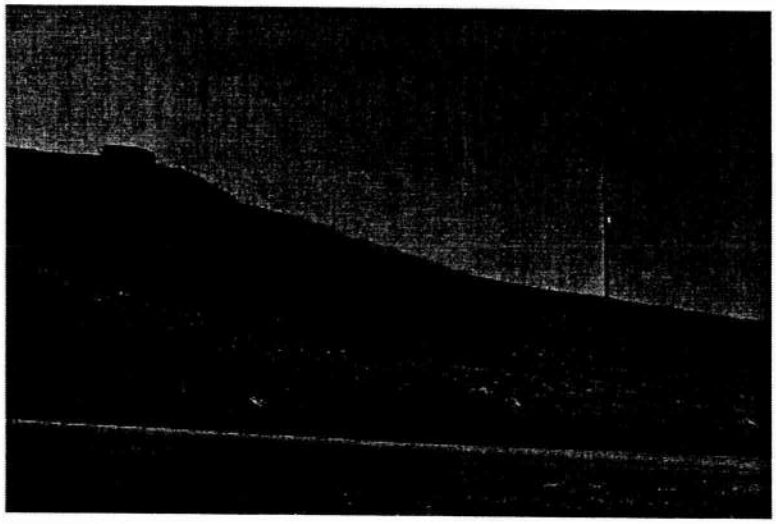
Although the parcel encompasses 9.8 acres, only about half of that area has slopes less than 20 percent. In addition, much of the site falls within the County's Geologically Sensitive Area combining designation. Consequently, development would be normally limited to the lower and less visible portions of the site.

As was discussed in the section on significance thresholds, visual impacts are considered to be significant if the proposed project is highly visible from a primary viewing corridor; and/or the proposed project results in a substantial decrease in the visual or scenic quality of an area. This area is not highly visible from a primary viewing corridor or the ocean.

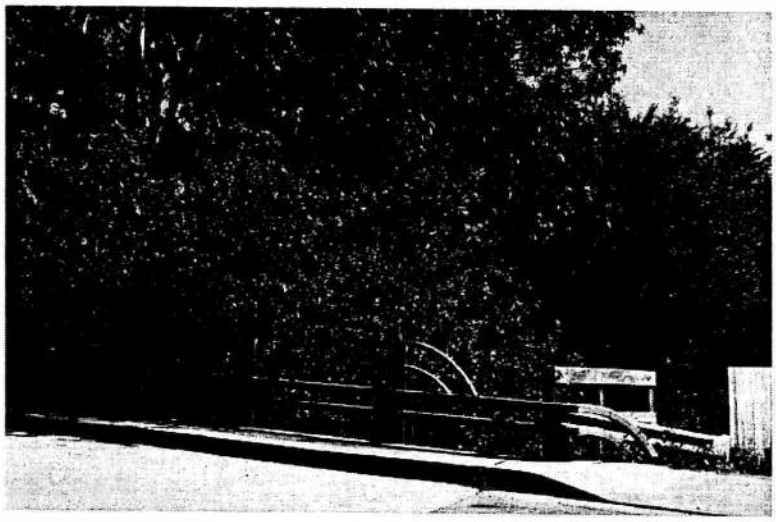
Based on the following discussion and geology of the site, the visual quality impact of developing this site is considered less than significant because the visual impact of the potential uses would be minimal due to natural constraints on development and limited visibility.

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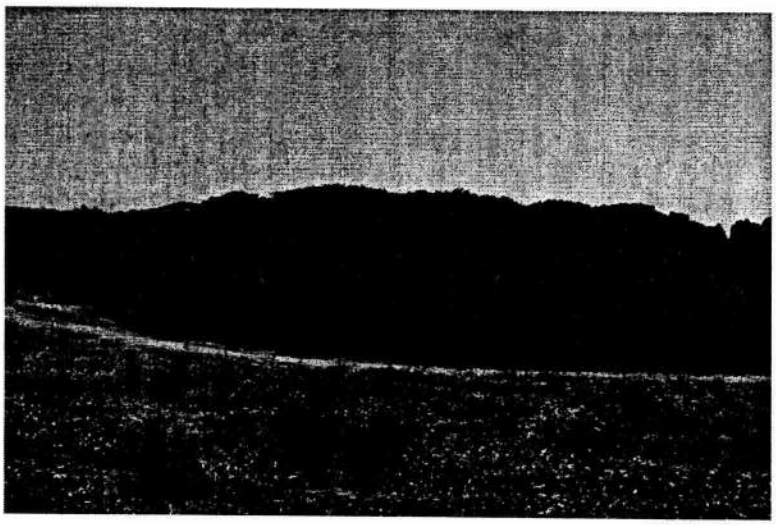
2 *Estero Area Plan Update. Environmental, Cultural Resources.* San Luis Obispo County, July 2003.



Impact AES 2



Impact AES 3



Impact AES 4

Figure 5.10.2

Impact AES-3: Potential visual quality impact from development of land ~~use~~ following a change in designation ~~change~~ from Recreation to Residential Multi-Family/Commercial Retail.

Special Policies, Programs and Standards

- Special Features, Policies and Programs: Combining Designations. Flood Hazard (FH) policies pertaining to Los Osos, Chorro, Morro, Toro, Willow, Old, Cayucos, Little Cayucos, and Villa Creeks and Tributaries (FH). These flood-prone natural drainage courses should be maintained in their natural state to protect native vegetation and wildlife habitats. Flood hazard areas in Cayucos should be used for recreation where feasible.[3]

Impact Discussion

The second land use designation change of concern, with regards to visual quality, in the Cayucos area consists of an area along Little Cayucos Creek in which parcels with the Recreation designation have been changed to either Residential Multi-family or Commercial Retail. This change in land use designation would result in no change in buildout or allowable uses, since the creek area is protected through coastal standards and policies. This area is of concern because it is located on either side of Little Cayucos Creek. However, all future development must conform to setback and other creek standards per existing and proposed CZLUO and planning area standards, as noted above.

As was discussed in the section on significance thresholds, visual impacts are considered to be significant if the proposed project is highly visible from a primary viewing corridor; and/or the proposed project results in a substantial decrease in the visual or scenic quality of an area. This area is not highly visible from a primary viewing corridor and the potential impact of possible land use changes would not be significant.

c. Cayucos Fringe Area.

There are no proposed land use changes that are expected to impact the visual quality of the Cayucos Fringe Area.

d. Los Osos Area.

Three areas in Los Osos were assessed for potential visual quality impacts. The areas were selected for analysis based on anticipated changes to land use based on buildout of the proposed plan. In addition, these same areas were identified as being largely vacant and having high development potential at this time. Thus, although the land use designation changes between the proposed plan and the existing plan are minimal, the actual patterns of change between existing conditions and expected conditions at buildout are substantial. The three areas include 1) areas along the Los Osos Creek corridor, 2) vacant parcels west of Pecho Road, and 3) Morro Shores mixed use area. Figure 5.10-3 shows the location and extent of these areas by impact number.

[3] *Estero Area Plan Update. Environmental, Cultural Resources.* San Luis Obispo County, July 2003.

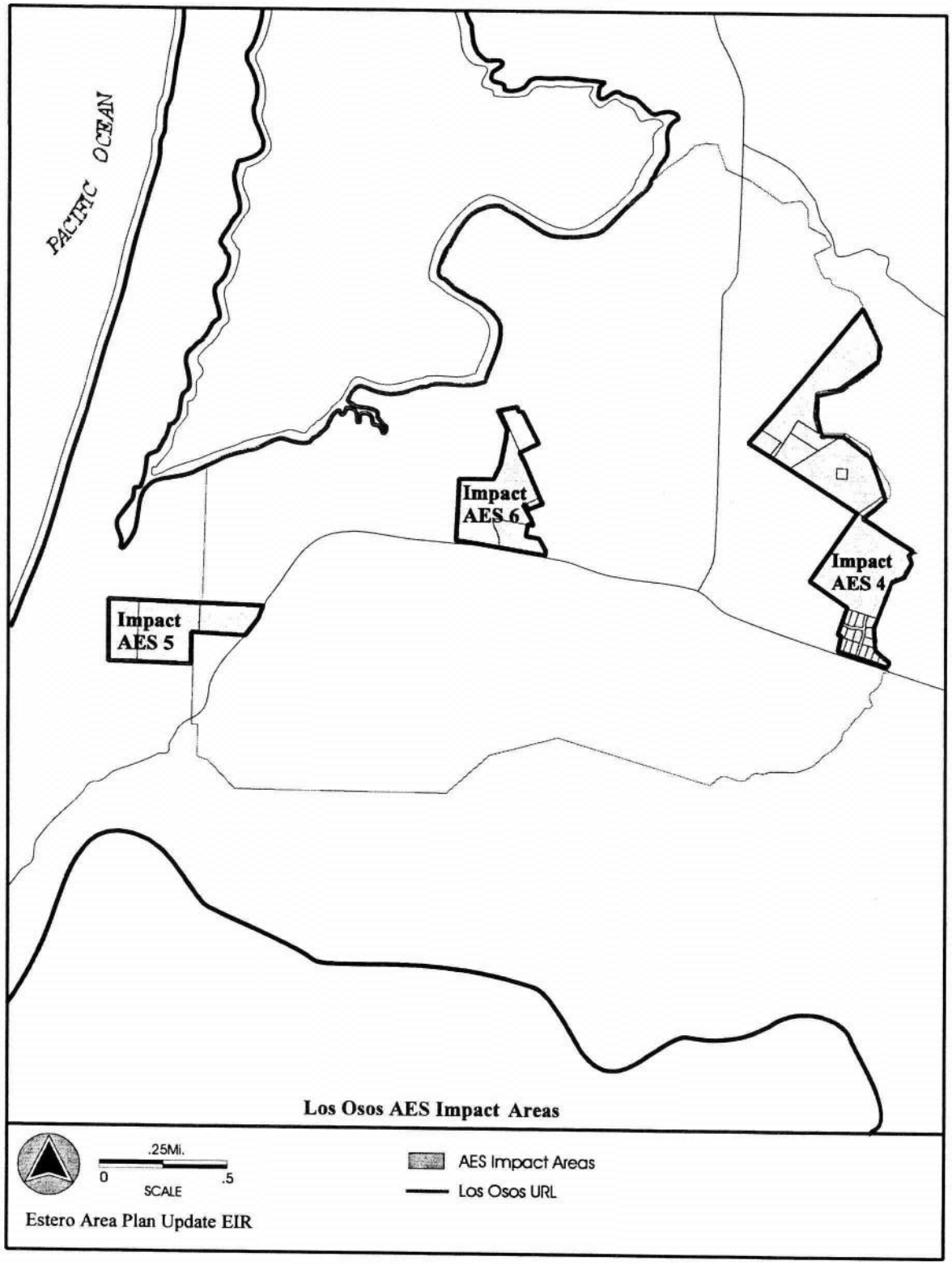


Figure 5.10-3 Los Osos Impact Areas.

Impact AES-4: Potential visual quality impact associated with development in areas along the Los Osos Creek corridor.

Special Policies, Programs and Standards

The plan for this area also encourages permanently protecting, sustaining, and managing agriculture and sensitive habitats through a variety of measures. These include establishing TDC sending sites for parcels adjacent to the creek inside and outside the urban reserve line, streamlining development review for projects that protect habitats through conservation easements, and offering a potential minor density increase for new land divisions that include conservation easements.

Impact Discussion

This area encompasses most of the Los Osos Creek Corridor within and adjacent to the urban reserve line (see Figure 5.10-2). The landform of the area is predominantly flat with low profile knolls. Overall, the area slopes down to Los Osos Creek, which forms the eastern boundary. This slope limits the visibility of the site from Los Osos Valley Road. The riparian corridor is visible from much of the site. Vegetation at the site includes a mixture of non-native grasses, low growing coastal scrub and islands of coastal live oak. There are a few agricultural structures on the site and some areas have been cleared for agricultural fields, but the overall impression is one of an intact natural area. The surrounding areas are predominantly undeveloped as well, although portions of the southern boundary of the area abut a low density residential area.

As was discussed in the section on significance thresholds, visual impacts are considered to be significant if the proposed project is highly visible from a primary viewing corridor; and/or the proposed project results in a substantial decrease in the visual or scenic quality of an area. This area is not highly visible from a primary viewing corridor, but the visual impact of the allowed development would be significant, as the development would reduce the overall visual quality of the area from high to moderate.

Impact AES-5: Potential visual quality impact ~~in~~ associated with development of vacant parcels west of Pecho Road.

Special Policies, Programs and Standards

Policies pertaining to the vacant area West of Pecho Road. Densities and standards in this area are adjusted to make development more environmentally sensitive, primarily by shifting development potential to less environmentally and visually sensitive locations. TDC sender sites are proposed to transfer potential development away from the western portion nearest the sandspit. In addition, standards for the Recreation category have been revised to increase the allowable number of lodging units, limit the area of site disturbance to ten acres, and preclude residential development.

Impact Discussion

The area west of Pecho Road encompasses about 60 acres (see Figure5.10-4). The area is composed of a dune complex that slopes towards the bay and sandspit. The vegetation is composed of intact coastal dune scrub. Homes on suburban-sized parcels are developed to the north, south and east.

This area is visible from the sandspit and other locations in Montana de Oro State Park. In terms of viewer sensitivity, the site is moderately sensitive in that it is visible from between 4 and 7 of the viewpoints along the primary viewing corridors used in the visibility analysis.

This area is not highly visible from scenic or recreational corridors, but the visual impact of the allowed residential and lodging units would be significant, since such development would reduce the overall visual quality

of the area from high to moderate or low, especially as viewed from the coast.

Impact AES- 6: Potential visual quality impact associated with development in Morro Shores.

Special Policies, Programs and Standards

Policies Pertaining to Morro Shores This 75.5-acre area, referred to as the Morro Shores mixed use area, in the central part of Los Osos. A specific plan is required for much of this mixed use area, which is proposed to be designated RSF, RMF, CS, CR over the entire site. The specific plan may include one or more multi-use business parks and residential uses that provide opportunities for affordable and senior citizen housing. The multi-use business parks are intended for non-polluting light manufacturing/assembly uses (particularly research and development, and high technology). The business parks would be campus-like and compatible with surrounding residential neighborhoods, and have a recreation area for use by employees. The specific plan may include medium and medium-to-high density residential development, with a density bonus provided for senior citizen housing. The specific plan may include other uses as well: neighborhood commercial/residential mixed use, a community services center, low density residential, and wastewater treatment ponds/park/recreational space as part of a community sewer system.

Impact Discussion.

On-site visual quality. This area is located in the central part of Los Osos. The area is relatively flat. The northeasterly edge of this unit ends on a bench above the estuary and is adjacent to residential development. A parcel on the northern boundary of the area borders the Sweet Springs Nature Preserve. The vegetation of the area is primarily composed of Eucalyptus and weedy species such as annual European grasses. The site shows evidence of gully erosion. A number of dirt tracks cross the site. Moving toward the north, some native species such as lupine, manzanita, and coastal live oak appear on the site.

Buildout of this area could include 98,000 square feet of multi use business park, up to 414 residential units, and up to 98 lodging units.

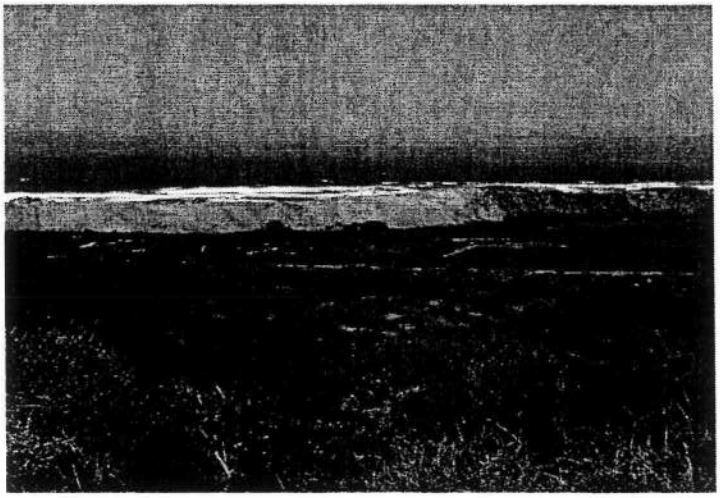
The area is visible from Los Osos Valley Road, but it does not meet the visibility criteria for a significant impact, since it is not visible from at least 12 viewpoints located throughout the community. The scenic quality of the site would be substantially impaired, however; therefore the on-site visual impact of the allowed uses would be significant.

e. Other Watershed.

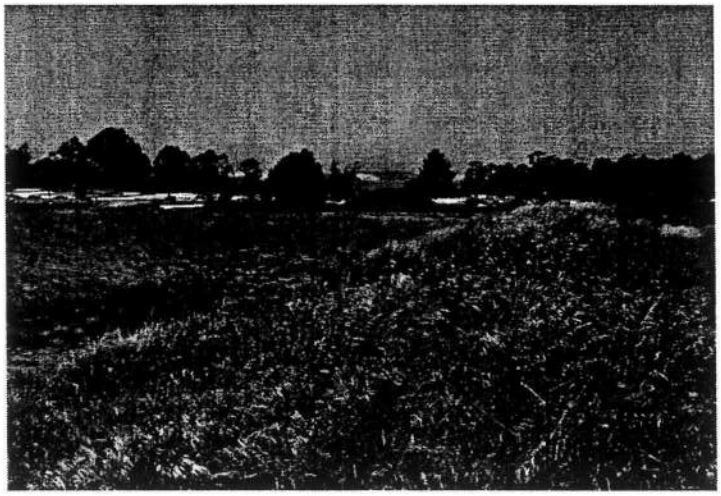
There are no proposed changes that would impact the visual quality of the area. Under the proposed plan, additional policies would be implemented within the Estero planning area to protect visual quality, as described above under area wide impacts.

5.10.3.3 Mitigation Measures

Many of the adverse impacts that would occur as a result of development in the planning area would be mitigated through adherence to existing regulations already adopted by the County. These include Coastal Plan policies, Coastal Zone Framework For Planning policies, Agricultural and Open Space Element policies, and Land Use Ordinance regulations which pertain to setbacks, height restriction, signage, and landscaping. Some new development (discretionary projects) would also have to undergo environmental review and evaluation of potential visual impacts on a project-by-project basis.



Impact AES 5



Impact AES 6

Figure 5.10.3

In addition, the Area Plan update contains new standards which would provide further mitigation for potential aesthetic impacts. These include restrictions with respect to development within Sensitive Resource Areas (SRAs) and an array of protective policies developed for Los Osos.

Generally speaking, the SRA standards contained in the proposed Area Plan along with the existing CZLUO standards would be adequate to mitigate many potential aesthetic impacts which may occur as a result of development in the planning area. In no case is it recommended that the standards be made less stringent than proposed. In addition, the spatial extent of the SRA designation is considered adequate to mitigate potential impacts to the extent possible.

However, reliance on these measures would not mitigate all of the potential adverse impacts associated with the proposed Area Plan update because the scenic quality of several areas (as described above) is dependent upon large intact areas of natural vegetation, which would be reduced if development occurred. In addition, no measures to fully mitigate cumulative impacts are available.

a. General Measures

Mitigation Measure AES-1: General measures to reduce visual impacts are largely addressed in the CZLUO and the proposed Estero Area Plan. If the proposed CZLUO amendments are not adopted, an amendment to the Estero Area Plan Update would be necessary. The amendment shall include protection measures equivalent to or better than those proposed in the CZLUO amendments.

b. Site-Specific Measures

No other site-specific measures are applicable until the time of development of individual projects. Therefore, no additional site-specific measures are recommended.

5.10.3.4 Residual Impacts

The aesthetic impacts of the proposed area plan can be reduced to less than significant levels in Cayucos, for Impacts AES-2 and AES-3 by implementing the measures outlined in the draft area plan. These measures are summarized in the impact discussion in the section on special policies, programs and standards.

The aesthetic impacts of the proposed area plan cannot be reduced to less than significant levels in all of Los Osos.

For impacts AES-4, AES-5, and AES-6, the impacts remain significant after mitigation primarily because the existing intact natural environments at these sites contribute to high levels of scenic beauty which cannot be duplicated by urban development.

5.10.4 Cumulative Impacts

As a whole, the Estero planning area may be characterized as "scenic", based on the criteria described at the outset of this analysis. There is great scenic quality and high visual sensitivity, especially in comparison to many similar-sized areas throughout the state and country. The planning area's aesthetic quality is one of the main reasons why people enjoy visiting or residing there.

In the event that all the development allowed under the Area Plan update occurs, the aesthetic character of the planning area would be unavoidably changed to a more urban environment.

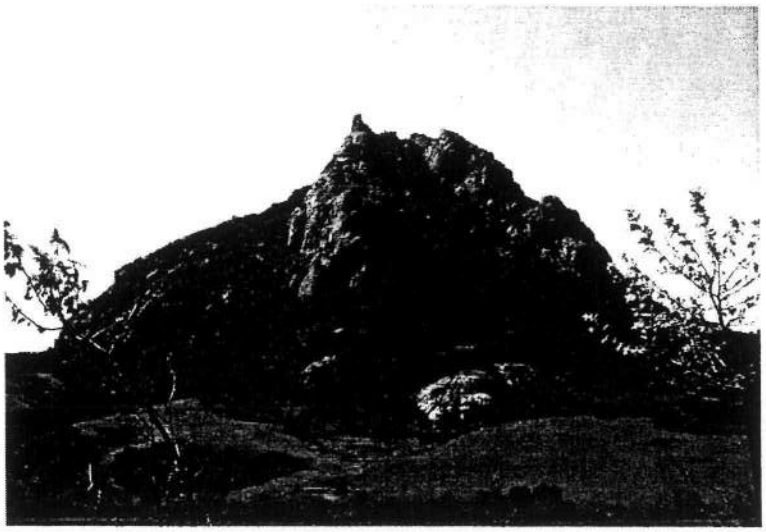
5.11 Geologic Conditions

This section includes a discussion of the geology and seismicity in the Estero planning area and the impacts of the proposed Estero Area Plan.

5.11.1 Setting

NOTE: Much of the information contained in the setting has been obtained from the San Luis Obispo County Safety Element (2001).

5.11.1.1 Regional (Structural) Geology



California is divided geologically into several physiographic or geomorphic provinces, including the Sierra Nevada range, the Central (Great) Valley, the Transverse Ranges, the Coast Ranges, and others. San Luis Obispo County (and the Estero planning area) lies within the Coast Range geomorphic province of California.

The portion of the Coast Range province that comprises the coast of central California was formed at the intersection of two tectonic plates: the Pacific to the west, and the North American plate. The compressive and shearing motions between the tectonic plates resulted in a complex system of active strike-slip faults, reverse faults, thrust faults and related folds (bends in rock layers).

San Luis Obispo County is also divided into structurally and physiographically distinct areas, called seismotectonic domains. The domains include the Santa Maria-San Luis Range domain, the Coastal Franciscan domain, the Salinian domain, and the Western San Joaquin Valley domain. The seismotectonic domains are bounded by major Quaternary-age faults that divide the County into areas of distinct styles of faulting, seismic activity and geology.

Santa Maria Basin-San Luis Range Domain (SMB-SLR). The Santa Maria Basin-San Luis Range domain (SMB-SLR) comprises the southwestern area of the County, including Nipomo, Oceano, Grover Beach, Arroyo Grande, western San Luis Obispo, Avila, Los Osos, and the adjacent hills of the San Luis Range and Irish Hills. The domain forms a transition between the Transverse Range geomorphic province to the south, and the Coastal Franciscan domain to the north.

The surface geology in the low-lying areas of the domain predominately consists of Quaternary and Holocene sediments of alluvium, dune deposits, and Paso Robles Formation. The terrain in the coastal areas is generally characterized by moderate relief, bound by the steep terrain of the uplifted San Luis Range to the east.

There are at least two recognized active faults in the domain, the Hosgri fault and the Los Osos fault. Several moderate magnitude earthquakes have occurred in the SMB-SLR domain.

The main geologic hazards in this area are groundshaking and liquefaction or seismic-related settlement of alluvium within low-lying areas, tsunamis and coastal erosion in ocean front areas, and slope stability and

landslide hazards in the steeper terrain and less developed areas of the Santa Lucia Range and Irish Hills.

Coastal Franciscan Domain. The Coastal Franciscan domain generally lies along the mountains and hills associated with the Santa Lucia Range. The domain incorporates the coastal communities of Morro Bay, Cayucos, Cambria and San Simeon, and the western slopes of the Santa Lucia Range in San Luis Obispo and east of Arroyo Grande. The Santa Lucia Range resulted from uplift during the Pliocene and Quaternary periods.

The surface geology within the domain consists of a northwest-trending sliver of largely Franciscan formation rocks, bounded by the Hosgri fault and West Huasna fault on the west and the Nacimiento fault and the Rinconada fault on the east. The Franciscan complex is a mixture of igneous, metamorphic, and sedimentary rocks. Cretaceous-age (65 to 140 million years old) and Tertiary-age (2 to 65 million years old) sedimentary rocks, including an unnamed Cretaceous sandstone, and a relatively small amount of Lospe, Vaqueros, Rincon, Monterey and Pismo formations, overlie the Franciscan Formation basement rocks in some parts of the region. The domain is characterized by moderate earthquake activity during the Quaternary period and has numerous northwest-striking, mainly northeast-dipping faults, with uncertain potential to generate future earthquakes.

The main geologic hazards associated with this domain are groundshaking, liquefaction or seismic related settlement of alluvium in the low-lying areas of the coastal portion of the domain, tsunami and coastal erosion in ocean front areas, and severe landslide potential on moderate to steep hillsides. The slopes of the Santa Lucia Mountains are underlain by mostly the Franciscan Formation and other Cretaceous age rocks that are considered to be the formations most susceptible to landslides in the County. Much of the northern coastal plain is characterized as a wave cut platform on which Quaternary- age marine terrace deposits overlie the older bedrock. Streams in the region are typically bordered by steep to moderately steep terrain, and the bottoms of stream valleys contain Quaternary- to Recent-age alluvium which overlies the bedrock. Table 5.11-1 describes the lithologies in the Estero planning area.

Table 5.11-1: Geologic Units Within the Estero Planning Area

Age	Symbol	Unit	Description
Holocene	Qal	Alluvium	Gravel, sand, silt and clay, unconsolidated.
Holocene	Qls	Landslide	Rock and mudflow debris derived from upslope formations.
Pleistocene	Qtm	Marine Terrace	Conglomerate, sandstone, mudstone, loosely consolidated.
Tertiary	T	Undifferentiated Tertiary rocks	Consolidated sandstone and mudstone including Pismo, Monterey, Obispo, Rincon, Vaqueros and Lospe Formations
Cretaceous	K	Unnamed and undifferentiated Cretaceous to lower Tertiary sandstone	Unnamed Cretaceous sandstone, and pre-Franciscan Formation volcanic rocks.
Cretaceous & Jurassic	Kjf	Franciscan Formation	Metamorphosed graywacke sandstone, chert, shale, schist volcanic rocks and serpentine.

Source: Paul Sorenson, Fugro West, Inc., pers. comm.

5.11.1.2 Seismic Setting

The Estero planning area is located in a seismically active region which includes several active earthquake faults of both local and regional significance, most notably the San Simeon - Hosgri Fault zone. Other significant faults in the general region include the Los Osos, San Andreas, Nacimiento and Rinconada Faults (Figure 5.11-1). An active fault is defined as a fault that has a historic seismic record (activity in the last 100 years) or displaces Holocene (11,000 years and younger) deposits. Faults that exhibit signs of geologically recent (active within the past 11,000 years) movement are considered the most likely to experience movement in the near future. Therefore, active faults are generally thought to have the greatest fault rupture potential. Most agencies, however, will consider potentially active faults (active within the past two million years) as being capable of generating future earthquakes. Faults classified as inactive are not considered to present a significant fault rupture hazard

or seismic source.

To address this hazard, California has adopted the Alquist-Priolo Special Studies Zones Act (APSSZA) of 1972. The APSSZA act was updated in 1994 and the title was revised to the Alquist-Priolo Earthquake Fault Zoning Act (APEFZA). The intent of this Act is to minimize the chance for structures with human occupancy to be built over active faults by requiring a geological investigation for new development within designated active earthquake fault zones. For purposes of implementing the Act, it is assumed that the area within 50 feet of an active fault is underlain by active branches of the fault, until proven otherwise by an appropriate geologic investigation. A brief description of major active faults in the region, based on data in the San Luis Obispo County Safety Element, follows.

- **Cambria Fault**. The northwesterly trending Cambria fault is approximately 64 kilometers long, including an 8-kilometer projection across eastern Estero Bay. Hall and Prior show the fault coming back onshore near Morro Bay, and converging with the Oceanic and West Huasna fault near San Luis Obispo. The fault, located within the Coastal Franciscan domain, has been mapped locally as a reverse or thrust fault. Weber noted that a terrace deposit in the Cambria area may be displaced by the Cambria fault, with an apparent 3-inch step in elevation of the terrace surface near Ellysly Creek but could not be confirmed during review by the California Division of Mines and Geology (CDMG). The Cambria fault is considered potentially active.

- **Los Osos Fault Zone**. The Los Osos fault zone has been mapped generally in an east/west orientation, along the northern flank of the Irish Hills. T he western end of the onshore fault zone is located near the community of Los Osos, and the eastern end is located near U.S. Highway 101.

  The location and recent activity of various strands of the Los Osos fault zone are discussed by PG&E, Treiman, and Lettis and Hall. The PG&E report identifies the Los Osos fault zone as including both the Los Osos and the Edna faults, and identifies the Los Osos fault as being offset Holocene sediment, and is therefore considered to be active. Data presented by Lettis and Hall indicates that the Los Osos fault zone is a west-northwest striking reverse fault that extends from the Hosgri fault (offshore) eastward up to 35 miles to an intersection with the West Huasna fault near Twitchell Reservoir.

  The CDMG conducted field evaluations for the main strand of the Los Osos fault near the intersection of Los Osos Valley Road and Foothill Road. This investigation indicated that faulting activity has taken place along the main strand of the fault within the last 11,000 years. This evidence of recent activity resulted in the establishment of an Earthquake Fault Zone by CDMG in 1989 under the Alquist-Priolo Act. The Earthquake Fault Zone is located near the westerly limits of the City of San Luis Obispo. It should not be interpreted that the active portion of the main trace of the Los Osos Fault is limited only to the designated Earthquake Fault Zone. Rather, the limits of the established Earthquake Fault Zone correspond to the limits of the available information provided in studies performed by Hall and Prior, and PG&E. As additional information about other segments of the fault is provided by additional studies, it may be appropriate for CDMG to expand the Earthquake Fault Zone.

  Mapping by Lettis and Hall and recent unpublished geotechnical studies by Asquith suggest that the Los Osos fault may segment or splay within the community of Los Osos. Asquith mapped a northwest-southeast striking fault strand that may offset the main strand of the Los Osos fault. The location of the northwest-southeast fault strand has been inferred based on ground water levels and other geologic conditions. The activity of this fault segment is unknown, but is inferred to be potentially active or possibly active. The existence and activity of this fault segment are of concern because it is located several hundred feet south of the South Bay fire station and the Sunnyside Elementary School.

  Assuming an overall fault length of 35 miles, the Los Osos fault has the potential to generate an earthquake with a magnitude M_w6.75. PG&E estimated a slip rate of 0.1 to 0.6 mm/yr and a surface

displacement of 1.6 to 5 meters per event. More recently, Lettis and Hall estimated a vertical slip rate of approximately 0.2 to 0.8 mm/yr. CDMG reports a slip rate of 0.5 $\pm$ .4 mm/yr.

- **Hosgri Fault Zone**. The Hosgri fault zone has been interpreted to extend from the northern termination west of the southern San Simeon fault in the Cambria/Point Estero area to its southern termination offshore of Point Pedernales. The fault is located entirely offshore, where conventional geologic mapping and paleoseismic studies cannot be performed. On the basis of geophysical work by Steritz and Luyendyk, the Hosgri fault is characterized as a near-vertical oblique right-slip fault along most of its length. An alternative interpretation of the southern Hosgri fault zone by Cummings and Johnson suggests that both the vertical and lateral slip decreases to the south and the fault dies out offshore from Point Arguello. On the basis of studies performed for, the Hosgri fault (offshore and not rated) is interpreted to have late Quaternary strike-slip displacement along a high-angle northwest strike fault zone.

- **San Andreas Fault Zone**. The San Andreas Fault (Figure 5.11-1) is located approximately 40 miles east of the Estero planning area, and is considered to be the most likely source of a future major earthquake in California, with potential seismic events of a magnitude 8.5 on the Richter Scale. This fault is also designated as an Alquist-Priolo Special Studies Zone. A seismic event along this fault would pose a substantial risk for the Estero planning area.

- **Nacimiento Fault Zone**. Trending northwest to southeast, the Nacimiento Fault is located just east of the Estero planning area, in the Santa Lucia Range. Several recent moderate seismic events (including a 6.0 quake in 1952) have centered on this fault. The CDMG assigns a maximum moment earthquake potential of 7.5 for this fault.

- **Rinconada Fault Zone**. The Rinconada Fault, which trends northwest to southeast between the Nacimiento and San Andreas Faults approximately 12 miles east of the Estero Planning Area. Geomorphic evidence suggests Quaternary movement on the fault, and CDMG has assigned a long-term slip rate of 3 mm-yr to the fault. It is considered by most investigators to be a potentially active fault.

Blind Faults. In addition to the known active faults with surface expression, there is also a potential for earthquakes on "buried" or "blind" thrust faults that are more active at depth but have poor expression of this activity at the ground surface. The 1983 Coalinga and 1994 Northridge earthquakes have been attributed to fault movement on blind thrust faults. Based on evaluation of geophysical data, subsurface oil well data, and previous geologic surface mapping, Namson and Davis hypothesized the presence of several blind thrust faults beneath the Santa Maria basin and San Luis Obispo County area, including the coastal cities and San Luis Obispo. On the basis of their structural evaluation, Namson and Davis conclude that the blind faults are capable of generating moderate to large earthquakes of magnitude M_w 5.0 to magnitude M_w 7.5. The Namson and Davis model suggests that blind thrust faults could pose a significant seismic risk throughout the County.

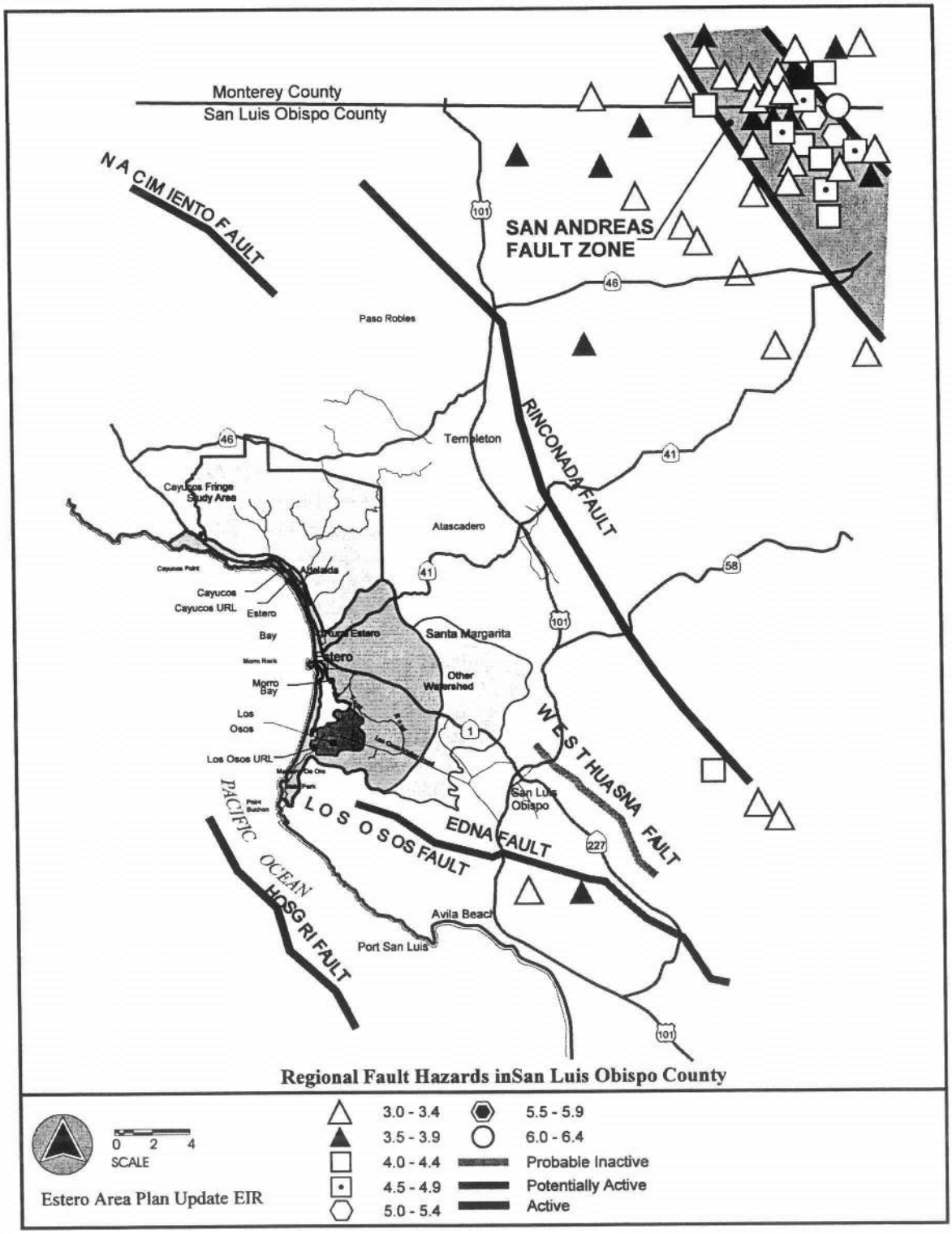


Figure 5.11-1 Seismic Hazards

5.11.1.3 Geologic Hazards

The Estero area is subject to several types of related but distinct geologic hazards, including earthquakes, liquefaction and landslides. These hazards are described briefly below.

- **Ground Shaking (Earthquakes).** Small to moderate earthquakes (magnitudes less than 5.0 on the Richter Scale) are common in San Luis Obispo County. The most significant quakes affecting the County during the last century have generally been centered outside the County itself, and have included events in excess of 7.0 (M7.0 Lompoc in 1927 and M7.7 Tehachapi in 1952). The most recent major quake within 100 miles of the area was the 6.5 Coalinga temblor of 1983. The July 1992 Landers earthquake (7.5) and January 1994 Northridge earthquakes (6.6) were felt in the Estero Planning Area, however, no damage was known to occur in the County.

  Research has shown that areas that are underlain by layers of unconsolidated, recent alluvium and unconsolidated soil material with high ground water have an increased risk of experiencing the damaging effects of groundshaking. The coastal areas considered to be at increased risk to amplification of ground motion include the Los Osos Valley, San Luis Valley, Los Osos/Morro Bay Area, Cambria, Cayucos, and the Grover Beach/Oceano/Arroyo Grande areas[1].

- **Ground Rupture.** Seismically induced ground rupture is defined as the physical displacement of surface deposits in response to an earthquake's seismic waves. Ground rupture is most likely to occur along active faults. However, the potential for ground rupture also exists along potentially active faults, such as the Los Osos fault in the Estero planning area. Therefore, development in areas overlying fault zones, whether active or potentially active, should be avoided. Any development that does take place within these areas should be required to perform a fault hazard study to assess the potential for damage associated with fault rupture and to establish setbacks to mitigate the potential for such damage. Refer to Section 5.11.3 "Impact Analysis and Mitigation Measures", for more detail.

- **Liquefaction.** Liquefaction is a phenomenon where near surface soils lose cohesion and are converted to a fluid state as a result of severe vibration. Loose, granular soils are most susceptible to these effects, while more stable silty clay and clay materials are generally somewhat less affected. The potential for liquefaction is generally associated with unconsolidated, saturated loose granulated soils. In general, liquefaction potential varies according to soil type, with Recent, unconsolidated alluvial soils having the highest potential. Within the Estero Area, these types of soils are associated with stream channels, sand dune areas, and estuaries. The potential for liquefaction decreases with increased consolidation of soil particles; therefore, soils with a greater propensity for consolidation, such as finely grained clays, have a reduced liquefaction hazard. Areas underlain by bedrock have the lowest potential for liquefaction due to bedrock stability. According to the Safety Element of the County General Plan, areas with high potential for liquefaction are found in both Cayucos and Los Osos within the Estero Area. These areas are proposed to be included in the Geologically Study Area (GSA)combining designation plan.

- **Landslides.** The occurrence of landslides is generally influenced by a number of factors, including slope angle, soil moisture content, vegetative cover and the physical nature of the underlying strata. Landsliding can be triggered by one or more specific events including development-related construction, seismic activity, soil saturation, and fires. Throughout California, several formations are considered to be prone to landsliding, including the Franciscan Formation, which exists within the Estero planning area. The primary factor in determining landslide potential is an unstable slope condition. In general, the portions of the planning area adjacent to steeper slopes are subject to the greatest landslide potential. Note that the pattern of high landslide potential is generally opposite that of high liquefaction potential. The area with the greatest development potential on steep slopes is on the hillsides behind Cayucos, which is discussed in the Rural Area portion of this report.

- **Erosion and Sedimentation.** Erosion is a natural process that occurs over time and can be caused by either wind or water moving over soils. The natural erosion process is an important factor in building

up fertile valley soils and beach sand along the coastline. However, soil erosion can become a problem when human activities accelerate the rate at which soils are being displaced. Non-point sources including impervious surfaces, unsound farming practices, over-grazing, construction activities, and road construction (particularly unpaved roads) can all accelerate the rate at which soils are removed from hillsides. Point sources such as industrial wastewater discharges, mining activities, wastewater treatment plants, commercial and residential land uses, and agricultural operations can affect erosion rates through increased storm water velocity, disturbance of natural drainage patterns, and water discharges. Soil erosion can leave silt-choked streams, gullied hillsides, and damaged farmland.

- **Tsunami and Seiches.** Tsunamis (misleadingly called "tidal waves") and seiches are seismically induced waves which occur in the large bodies of water. Tsunamis as great as 5-6 feet have been recorded in Pismo Beach and San Luis Obispo. "The threat of tsunami-related damage is generally contained to low-lying coastal areas. According to research conducted by Houston and Garcia, the potential estimated runup along the Cayucos/Morro Bay coastline is approximately 9.5 feet to 24.2 feet for the 100-year and 500-year events, respectively.

  Within the Estero Planning Area, the tsunami hazard is greatest for that part of the area below the estimated elevations of the 100- to 500-year events. That is, below elevation s 24 and 39 feet above mean sea level, respectively. The severity of the exposure to the tsunami hazard will vary locally.

- **Subsidence.** One of the consequences of excessive ground water withdrawal from an aquifer that lacks a rigid framework is compaction of the aquifer. The water itself supports part of the load of the overlying materials and also keeps the grains of the aquifer loosely packed. When the water is removed from the intergranular spaces, the weight of the overlying rocks packs the grains together more closely. This cannot only reduce permanently the capacity of the aquifer, but also cause serious lowering, or subsidence, of the ground overlying the aquifer. Areas most vulnerable to subsidence are those underlain by loose, compressible clay-rich soils, in an area with excessive ground water withdrawal and general lowering of the water table.

- **Expansive Soils.** Expansive soils tend to swell with seasonal increases in soil moisture and shrink during the dry season as soil moisture decreases. The volume changes that the soils undergo in this cyclical process can stress and damage slabs and foundations if precautionary measures are not taken. Methods commonly used for slab protection include placement of nonexpansive material beneath the slab or premoistening of subslab materials.

5.11.1.4 Regulatory Setting

The following state and local regulations apply to the project and are designed for the protection of health and safety from geologic hazards:

- **Government Code Section 65302.1.** Government Code Section 65302.1 requires a safety element for the protection of the community from fires and geologic hazards, and must include features designed to minimize risks associated with these hazards. San Luis Obispo County adopted its safety element in 2001.

- **Government Code 65302(f).** Although no longer a requirement, California Government Code Section 65302(f) at one time specified that local jurisdictions were required to adopt a seismic safety element as part of their general plans. This element identifies and assesses seismic hazards and recommends policies to reduce adverse impacts associated with seismic events. San Luis Obispo County adopted its safety element in 2001.

- **Public Resources Code, Section 2621, et seq. (Alquist-Priolo Earthquake Fault Zoning Act 1994).** The State of California enacted the Alquist-Priolo Act in 1972 (amended 1974, 1975, 1976, 1979, 1994) to assist cities and counties in the regulation of land uses adjacent to active earthquake faults. The State

Mining and Geology Board has established Special Study Zones in which land uses are regulated under this act. The act requires that local jurisdictions conduct a geological investigation before approving development within a Special Study Zone, which are typically less than one-quarter mile in width.

- **Title 23 of the San Luis Obispo County Code.** The Coastal Zone Land Use Ordinance (CZLUO) (at 23.07.080) sets forth the Combining Designation Standards for Geologic Study Areas. These are areas where "geologic and soil conditions could present new developments and their users with potential hazards to life and property." The standards require preparation of a report on geologic hazards and appropriate mitigation measures. Structures must be designed to overcome these hazards. The CZLUO also contains blufftop setback standards (sec. 23.04.118) that require stringline setback methods and bluff retreat analysis for the siting of new development on coastal blufftops. Sedimentation and erosion control plans are required under the CZLUO (sec. 23.05.036) for land disturbing activities that occur under certain conditions.

- **Other Regulatory Requirements.** Sections 17922 and 17951-17958.7 of the State Government Code requires cities and counties to adopt and enforce the Uniform Building Code, including a grading section (Chapter 70) providing minimum protection against some geologic hazards. The County of San Luis Obispo implements these provisions.

5.11.2 Significance Thresholds

The State CEQA Guidelines declare that a project will have a significant impact if it "exposes people or structures to major geologic hazards" or if it causes substantial erosion. Major geologic hazards include: fault rupture, seismic ground shaking, seismic ground failure (including liquefaction), seiche, tsunami, landslides or mudflows, subsidence of the land, and expansive soils.

5.11.3 Proposed Project Impact Analysis and Mitigation Measures

This section analyzes impacts associated with implementation of the proposed Estero Area Plan.

5.11.3.1 Area-Wide Impacts

Impact GEO-1: **Significant impacts could occur because of the increased likelihood of soil erosion associated with development as described in the Estero Area Plan.**

Impact GEO-2: **Significant impacts could occur on local soils because of the increased likelihood of landslides associated with development as described in the Estero Area Plan.**

Special Policies, Programs & Standards Proposed by the Area Plan

Many of these provide mitigation to impacts that could result from development under the Estero Area Plan. **NOTE: subsequent modification or elimination of the policies cited in this section may modify the conclusions of this EIR.**

The Estero Area Plan includes three Geologic Study Areas:

- **Hillside Areas GSA.** This GSA is located on hillsides subject to high landslide risk, and covers many of the hillsides above Morro Bay and Cayucos.

- **Bluff Erosion GSA.** This GSA is located along portions of the coastline where bluff erosion is a concern. Development should generally be located to withstand 75 years of bluff erosion without the

need for a shoreline protection structure that would substantially alter the landform, affect public access, or impact sand movement.

- **Cayucos and Los Osos Liquefaction GSA.** The Los Osos urban area and portions of the Cayucos urban area along creeks, some bluffs and the shoreline are subject to a high potential for liquefaction, as identified in the Safety Element of the general plan.

NOTE: Based on information contained in a Fault Evaluation Report prepared by the CDMG[1], the Los Osos fault zone traverses the southern portion of the Los Osos Valley, extending from the eastern planning area boundary through Los Osos. A 1,000-foot wide zone on either side of the fault trace has a higher potential for ground rupture during an earthquake.

The Estero Area Plan also includes proposed standards for hillside development and erosion minimization, including requirements restricting runoff from impervious surfaces, and maximizing stormwater infiltration.

Geologic Study Areas. For all proposed development projects located within a Geologic Study Area, a geologic and soils report prepared by a certified engineering geologist and/or registered civil engineer is required. The report covers seismic shaking, liquefaction or landslide, and potential hazard of surface fault rupture. The report includes a review of local and regional seismic and other geological conditions that may significantly affect the proposed use, and an assessment of nearby or onsite conditions that would contribute to the potential for damage of a proposed use from a seismic or other geological event, or the potential for a new use to create adverse effects upon current uses because of geologic hazards. The report also provides conclusions and recommendations for building techniques, site preparation measures, and setbacks which would mitigate risks to life and property to insignificant levels. All land uses in a Geologic Study Area must also adhere to other specific standards relating to grading, seismic hazard areas, erosion and geologic stability.[2]

Other Areas. Mass grading during construction activities associated with future development projects would alter the natural topography of the Estero planning area and would most likely increase overall erosion rates in those areas. Moreover, development and excavation activities in areas of steep slopes during construction for future projects could increase the potential for unstable slope conditions and ground failure, potentially exposing people and property to geologic hazards.

Grading and excavation activities for future construction projects would disrupt normal soil conditions and remove vegetative cover. Soils in the Estero planning area exhibit a high erosion potential that, when combined with ground-disturbing activities during construction, could significantly increase the potential for wind and water erosion on graded areas and could increase the potential for sedimentation of local creeks and streams. Soils in the steep, sloping portions of the Estero area are also have a high landslide potential that construction activities and proposed development would adversely impact.

Geological/soils reports are usually required for all major subdivision, commercial, industrial, and multifamily residential projects subject to discretionary approvals. Slope stability is a required element of those reports, and all recommendations are subject to County review and approval. For larger projects, or those located in known problem areas, soils investigations are often required at the environmental review phase of the project.

These impacts are considered significant because they would result in a change in topography or ground surface relief features. Impacts to the most sensitive areas would be mitigated by the Geologic Study Area combining designation standards. Mitigation for the remaining areas must be determined on a project-specific basis.

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1 California Division of Mines and Geology (1989), *Fault Evaluation Report (FER-200)*, Los Osos Fault Zone, San Luis Obispo County.

2 County of San Luis Obispo. *Coastal Zone Land Use Ordinance, Combining Designation Standards, Sections 23.07.082-084.*

a. Seismicity.

Impact GEO-3: **Increased exposure of persons and property to seismic events associated with the Estero Area Plan would constitute a less than significant impact.**

Development as allowed by the proposed Estero Area Plan would result in construction in Seismic (Risk) Zone IV. Development in Seismic Zone IV could subject people and property to moderate ground shaking during a strong earthquake event on nearby faults, potentially causing moderate structural damage or injury. This impact is considered less than significant because all structures in the Estero planning area are required to comply with San Luis Obispo County building codes and Uniform Building Code (UBC) standards for Seismic Zone IV; thus, the potential for structural damage during earthquake events is minimized. No further mitigation is recommended.

b. Ground Rupture

Impact GEO-4: **Increased exposure of persons and property to potential ground rupture events associated with the Estero Area Plan would constitute a less than significant impact.**

There are no designated Special Studies Zones in the Estero planning area (only a portion of the Los Osos Fault located east of the Estero planning area has been designated as a Special Studies Zone by the State Geologist). Under the Alquist-Priolo Act (1972), Special Study Zones are established along faults that are designated as active by the State Geologist. The Special Study Zone for the Los Osos Fault extends approximately 1,000 feet on either side of the mapped fault trace, and is limited to that segment of the fault for which information is available.

Many fault lines exist in the Estero area, including the Hosgri and Cayucos (refer to Section 5.11.1.2 "Seismic Setting"). These faults have not been established as active (or inactive) by the State Geologist, and therefore, the potential for activity along these faults, including fault rupture, is not officially designated. For the purposes of this report, areas of potential impacts associated with ground rupture were identified only for those areas located along the Los Osos Fault. Overall, impacts are less than significant.

c. Liquefaction.

The potential for liquefaction triggered by a seismic event exists in the Estero planning area, and would be limited to areas underlain by saturated recent alluvium. These areas are generally located adjacent to watercourses on alluvial plains within the planning area (for example, the lower portions of the Chorro and Los Osos Valleys), such areas have also been identified in Cayucos and Los Osos and are proposed to be included in the Geologic Study Area (GSA) combining designation . The assessment of potential impacts associated with liquefaction is highly speculative and requires site-specific information regarding underlying soils, and would be conducted within site-specific geotechnical studies conducted for individual projects.

d. Landslide.

Impact GEO-5: **Impacts associated with implementation of the Estero Area Plan regarding landslides are less than significant.**

Landslide potential varies greatly throughout the Estero planning area, but can be characterized as moderate to negligible in most urbanized areas due to moderately sloped to relatively flat terrain. The portions of the planning area at greatest risk due to landslides are noted as "high risk" within the County's Seismic Safety Element. Under the Proposed Estero Area Plan, such areas are typically designated as Rural Lands or Agriculture. In addition, many hillside areas are designated as Geologic Study Areas (GSAs). Development density, setbacks and location are severely restricted in such areas under the proposed Estero Area Plan. Because of state and local regulatory requirements (including GSA standards), and because of the generally low- intensive development in hillside

areas, impacts would be less than significant. The most important exceptions to this discussion are the two antiquated subdivisions on the Cayucos hillsides, discussed below in the Rural Area portion of this report.

e. Tsunami and Seiches.

Impact GEO-6: The overall potential for tsunamis and seiches is considered remote, thus impacts (except for Cayucos) are not significant.

The Seismic Safety Element bases its assessment of tsunami hazards on the Division of Mines and Geology Tsunami Hazards Map[1], which designates four hazard classifications regarding tsunami hazards. The Tsunami hazard is greatest for that portion of the coastal communities located below elevations of the 100-year to 500-year storm events, that is, below elevations 24 and 39 feet above mean sea level, respectively. In general, much of the coastal area of Morro Bay and Estero Bay is protected from tsunami hazards by wide beaches, coastal dunes, or bluffs. The community of Cayucos is the most threatened by tsunami hazards. Impacts for tsunami must be assessed on an area-specific basis.

f. Subsidence

The potential for subsidence cannot be assessed at this level. Site-specific geotechnical studies must be performed to determine the potential for subsidence.

g. Expansive Soils

The existence of expansive soils must be assessed at a site-specific, as opposed to programmatic, level.

5.11.3.2 Community-Specific Impacts

a. Rural Area

Seismicity.

Impact GEO-7: Impacts associated with seismicity in the Rural Area would be considered less than significant under buildout as proposed in the Estero Area Plan.

Because earthquake hazards are regional in nature, the seismic impacts in the Rural Area are the same as for the entire Estero planning area. (Refer to Section 5.11.3.1 "Area-wide Impacts" for more detail.) Under the Proposed Estero Area Plan, almost no change to the current residential land use pattern would occur. Since there would be a small increase in the number of residents exposed to earthquake hazards upon buildout, a significant adverse impact could occur. However, implementation of state and local regulations regarding ground shaking (see Section 5.11.1.4) on a project-by-by project basis should reduce potential impacts to a less than significant level.

The Los Osos Fault runs through portions of the Rural Area. However, the relevant portion of the fault has not been established as active by a State Geologist. Until the activity (on inactivity) of the fault has been established, no assessment of impact can be made.

Ground Rupture.

As previously discussed with regards to the Estero planning area as a whole, impacts associated with ground rupture would be limited to development that overlies an active fault. Since the portion of the Los Osos fault within the Rural Area has not been designated as active or inactive, this impact is less than significant. Refer to the Area-wide discussion for more detail.

Liquefaction.

Portions of Rural Area are located over deposits of saturated recent alluvium associated with stream courses. The potential for liquefaction during a seismic event exists in portions of the Rural Area. However, development occurring within the rural area would generally be low density. The assessment of potential impacts associated with liquefaction requires site specific information regarding underlying soils, and would be addressed on a project by project basis.

Landslide.

Impact GEO-8: Development of residences on the Cayucos hillsides has a high likelihood of experiencing significant impacts from landslides.

Areas prone to landslide have been identified within the Rural Area. Between the Morro Rock View and Morro Strand subdivisions, there could be at buildout a total of 1,177 residential units (not considering site constraints). These are small paper lots generally located on steep hillsides. The lots were created in the late 1920s. A special report[3] was prepared by the County Planning Department to specifically address the problems associated with these areas. These areas are subject to the requirements of the Hillside Areas GSA. For all proposed development projects located within a Geologic Study Area, geologic and soils reports are prepared. The report also provides conclusions and recommendations for building techniques, site preparation measures, and setbacks which would mitigate risks to life and property to insignificant levels. The draft Estero Area Plan suggests reducing potential adverse impacts of development on these hillsides through, use of a Transfer Development Credits program, and formation of a regional open space district to fund purchase of lots. Current Coastal Zone Land Use Ordinance requirements include a minimum lot size of one acre where individual wells and septic systems are used, (much larger than nearly all existing lots) and suitability for septic system installation. The newly formed Cayucos Land Conservancy has identified the Cayucos hillsides as a high priority for conservation actions, including acquisition of development rights.

Development of the hillsides would result in significant geologic impacts to the area without extensive geotechnical mitigation in the form of massive grading and retaining structures. A report entitled *Geotechnical Feasibility of Development Study, Morro Rock View Subdivisions and Morro Strand Units 2 and 4, Cayucos, San Luis Obispo County, California*[4] concluded that substantial mass grading would be needed to correct extensive landslides on the hillsides, and that other areas may not be physically or economically feasible for development of permanent dwellings.

A final subdivision public report for Morro Rock View Subdivision, Units 1, 2 and 4 came to much the same conclusions:

- Moderate to large scale remedial stabilization will be needed to correct the landslide and mudflow in the northwest corner of the property in order to extend the access roadway; and,
- Residential development: More than 50 percent of the property cannot be developed because of existing hazard of landslide or steepness of slope.

This difficult problem of antiquated lots on inappropriate land for development will not be resolved solely by regulation. The proposed TDC, and the efforts of private non-profit organizations will be required to prevent inappropriate development on the hillsides. Because of the overlying Hillsides GSA Combining Designation, and its associated mitigating policies, this impact is considered to be less than significant.

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3 County of San Luis Obispo (n.d.), *Cayucos Issues Report #4: Cayucos Hillsides.*

4 *Geotechnical Feasibility of Development Study, Morro Rock View Subdivisions and Morro Strand Units 2 and 4, Cayucos, San Luis Obispo County, California* (1984), Converse Consultants.

Tsunami and Seiches.

Refer to Section 5.11.3.1.e "Area-wide Impacts".

Subsidence.

The potential for subsidence must be assessed on a project-specific basis.

Expansive Soils.

The potential for expansive soils must be assessed on a project-specific basis.

b. Cayucos

Seismicity.

Because earthquake hazards are regional in nature, the seismic impacts in Cayucos are the same as for the entire Estero planning area. Implementation of state and local regulations regarding ground shaking (refer to Section 5.11.1.4) on a project by project basis should reduce potential impacts to less than significant levels.

Ground Rupture.

The potential for ground rupture during a seismic event exists within the Estero planning area, but is limited to areas overlying active fault zones. No active fault zones have been identified within the community of Cayucos. Thus, potential impacts are not assessed in this report.

Liquefaction.

The community of Cayucos is located over deposits of saturated recent alluvium associated with stream courses. The potential for liquefaction during a seismic event in the Cayucos urban area is therefore considered to be high, reflected by the inclusion of areas of Cayucos in the Geologic Study Area and combining designation. The assessment of potential impacts associated with liquefaction requires site specific information regarding underlying soils, and would be addressed on a project by project basis.

Landslide.

There are some sizeable areas in the southern part of the community and northerly and easterly of the central business district that are within the GSA combining designation and are subject to potential landslide hazards. These areas will require the preparation of site-specific geologic studies prior to development, per the CZLUO. Other areas prone to landslide have been identified just outside the Cayucos Urban Reserve Line in the Cayucos hillsides. These areas are subject to the requirements of the Hillside Areas GSA. For a discussion of these areas, see discussion above in the Rural Area.

Tsunami and Seiches.

Impact GEO-9: Additional development on the immediate coastline could result in a less than significant impacts from tsunami damage.

According to the draft Safety Element, the historical record for San Luis Obispo County includes no tsunamis that have exceeded the normal tidal range. PG&E suggests that faulting in the offshore area could generate tsunami wave height as great as six feet. In San Luis Obispo County, coastal areas near Port San Luis, Cayucos, and San Simeon were designated as having a 'potential danger' from tsunami. This potential hazard level was the lowest risk designation included in the study. The potential for damage to coastal structures would be increased if the tsunami event were to coincide with a high tide.". Most of the nearshore properties in Cayucos are developed. The greatest development potential existed west of Cayucos on the Estero Bay Properties land,

but this has recently been purchased for conservation purposes and will not be developed. Therefore, impact from tsunami is considered less than significant.

Subsidence.

The potential for subsidence must be addressed on a project-specific basis.

Expansive Soils.

The potential for expansive soils must be addressed on a project-specific basis.

c. Los Osos

Seismicity.

Impact GEO-10: Potentially Significant Impacts on Development in the Vicinity of the Los Osos Fault.

The Los Osos Fault runs through portions of the community of Los Osos. In the constraints analysis, a Geologic Study Area (GSA) combining designation that would encompass land within 1000 feet of the Los Osos Fault was recommended. Owners of properties which fall within the combining designation would have to comply with the Coastal Zone Land Use Ordinance (CZLUO, Section 23.07.080). The CZLUO requires preparation of a report on geologic hazards and appropriate mitigation measures. Structures must be designed to overcome these hazards. This recommendation (refer to Figure 5.11-2) has been included as mitigation, reducing potential impacts in the area to a less than significant level.

Ground Rupture.

The potential for ground rupture during a seismic event exists within the Estero planning area, but is limited to areas overlying active fault zones. See the discussion on seismicity above.

Liquefaction.

Impact GEO-11: Potentially Significant Impacts to Development from Liquefaction in the Vicinity of the Los Osos Fault.

The community of Los Osos is located over deposits of saturated recent alluvium associated with the estuary. The potential for liquefaction during a seismic event in the Los Osos urban area is therefore considered to be high, and as a result Los Osos is included in the Geologic Study Area (GSA) combining designation. As the potential for liquefaction exists in the area, development projects within the Study Area included as mitigation would be required to complete a site specific geotechnical report to assess the potential for liquefaction onsite and recommend measures to reduce any potential impacts. Because of this mitigation, impacts associated with liquefaction in the area are considered less than significant.

Landslide.

The landslide risk factors in the Los Osos area are generally low. Therefore, impacts associated with landsliding are less than significant.

Tsunami and Seiches.

Refer to Section 5.11.3.1.e "Area-wide Impacts".

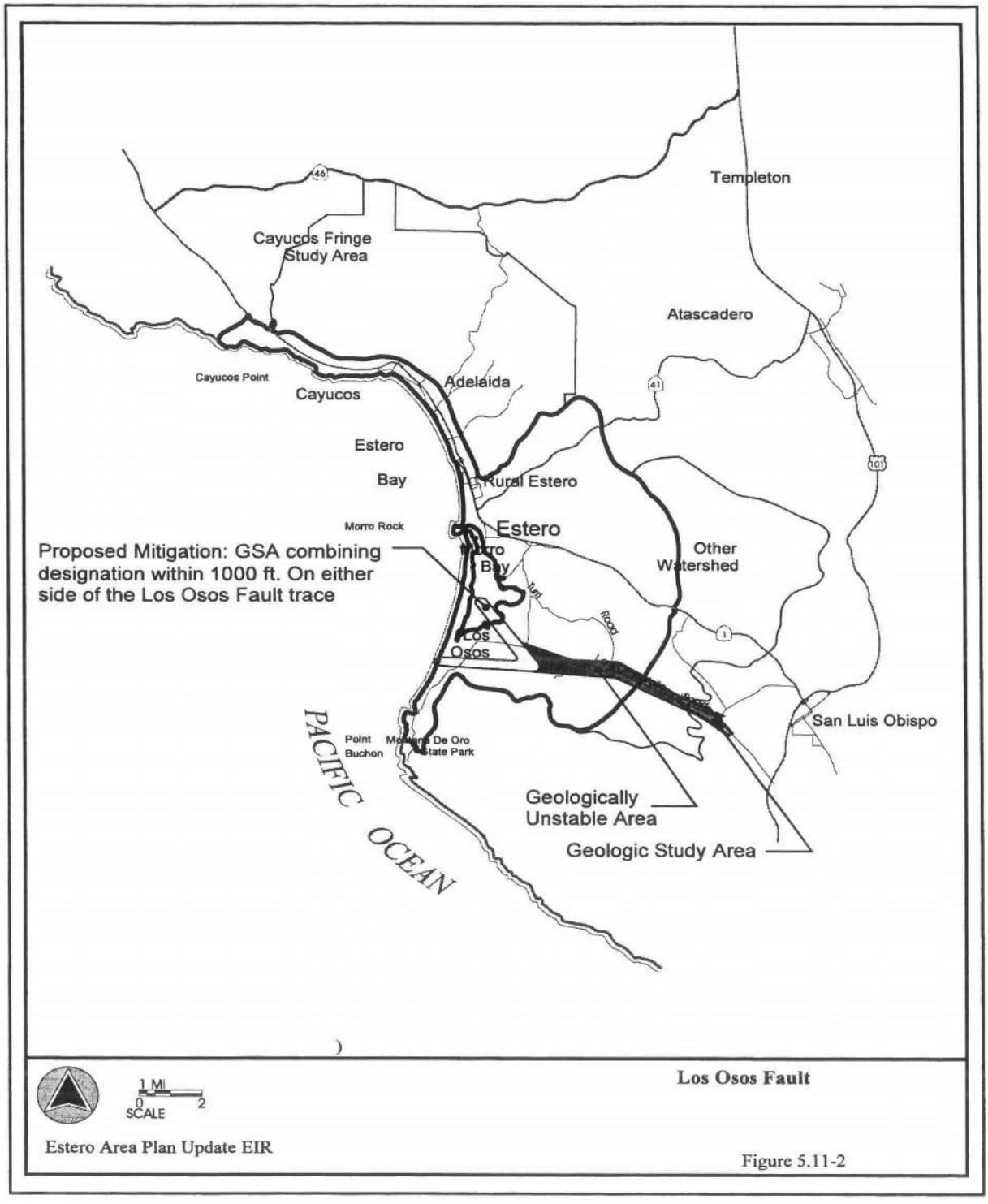


Figure 5.11-2 Los Osos Special Studies Zone

Subsidence.

Impact GEO-12: Buildout as described in the Estero Area Plan could result in subsidence associated with the Los Osos Basin, a potentially significant impact.

Subsidence has been documented along Los Osos Valley Road in the southern part of the City of San Luis Obispo. The subsidence occurred as a result of ground water extraction from municipal wells that resulted in settlement of compressible soils in the Laguna Lake area and eastern Los Osos Valley. Continued overdraft of the Los Osos Basin (refer to Section 5.4 "Water Resources" for more detail) would most likely increase the possibility of subsidence. The possibility of subsidence can be determined with geotechnical analysis which will be incorporated into the design of structures in the alluvium.

Expansive Soils.

The potential for expansive soils must be determined on a site-specific basis.

d. Cayucos Fringe

Seismicity.

Because earthquake hazards are regional in nature, the seismic impacts in the Cayucos Fringe are the same as for the entire Estero planning area. Implementation of state and local regulations regarding ground shaking (refer to Section 5.11.1.4) on a project by project basis should reduce potential impacts to less than significant levels.

Ground Rupture.

The potential for ground rupture during a seismic event exists within the Estero planning area, but is limited to areas overlying active fault zones. There are no active fault zones in the Cayucos Fringe Area. Therefore, impacts are not assessed in this report.

Liquefaction.

Portions of the Cayucos Fringe are located over deposits of saturated recent alluvium associated with stream courses. The potential for liquefaction during a seismic event in the rural area surrounding Cayucos are therefore considered to be high. Development requirements, the low-density nature of rural development and building code adherence reduces any potential impact to less than significant.

Landslide.

Much of the Cayucos Fringe Area is characterized by steep slopes, and is at high risk for landslide. Nearly the entire study area is included in the GSA combining designation due to the potential landslide hazard, and is subject to the GSA standards for development in the CZLUO. Since the majority of the area is protected by GSA combining designation standards, that and existing building codes would mitigate any potential impacts to a less than significant level.

Tsunami and Seiches.

Refer to Section 5.11.3.1.e "Area-wide Impacts".

Subsidence.

The potential for subsidence should be addressed on a project-specific basis.

Expansive Soils.

The potential for expansive soils should be addressed on a project-specific basis.

5.11.3.3 Mitigation Measures

None required.

5.11.4 Cumulative Impacts

Buildout under the proposed Estero Area Plan and buildout of other areas in San Luis Obispo County would incrementally expose additional lives and property to geologic hazards inherent to the region. Therefore, cumulative impacts are potentially significant.

With the implementation of the mitigation measures listed above, *project-specific* geologic impacts would most likely be reduced to less than significant levels. It is important to note, however, that because of the persistent nature of California's seismic conditions, cumulative, regional impacts associated with geologic hazards cannot be deemed mitigable in the long-term.

5.12 Cultural Resources

This section includes a discussion of effects of the proposed Estero Area Plan on cultural resources in the Estero planning area. The cultural resources overview is based on information in the proposed Estero Area Plan and the Environmental Constraints Analysis that was prepared for the Estero Area Plan Update in 1994, as well as more recent information from other large projects in the County (including the Los Osos Wastewater Project). It is important to understand that Native American resources in the Estero planning area are especially abundant, due in large part to the climate, and the wealth of food resources in and around Morro Bay. This is supported by the high number of archaeological sites that have been discovered around Morro Bay, Los Osos and Cayucos. The Estero Area Plan update contains a number of policies and programs designed to protect these resources. It is common practice in the County's Environmental Division to scrutinize even more closely development proposals in this area. Furthermore, the County is currently proposing amendments to the CZLUO for the entire Coastal Zone which would establish specific standards and protective measures for archaeological and historical resources. The EIR recommends continued support for the protection of these resources and a reinforcement of the measures designed to do so.

5.12.1 Setting

5.12.1.1 Regional Setting

a. Prehistory.

The Estero planning area lies within the historic territory of the Chumash-speaking Native Americans. At the time of first European contact, the Chumash population numbered in the thousands and their territory stretched from Malibu to northern San Luis Obispo County and inland as far as the western edge of the San Joaquin Valley, and the four northern Channel Islands. The Chumash are subdivided into factions based on six distinct dialects: Barbareño, Ventureño, Purisimeño, Ynezeño, Obispeño, and Island. It is uncertain whether the interior Cuyuma spoke a different Chumash language.

The Obispeño were the northernmost of the Chumashan speakers, occupying most of the western half of San Luis Obispo County. The language spoken by the Obispeño was quite divergent from the other Chumash languages.

The Salinan are subdivided into three major divisions, the Antoniaño, Migueleño, and the Playanos. The southernmost Migueleño, whose name is derived from the Mission San Miguel Arcangel, inhabited the northern portion of the county. Currently there is a paucity of archaeological and ethnohistoric data on the Migueleño, especially as compared to information on the Chumash. According to the limited historical and archaeological evidence, the Salinan followed a hunting and gathering lifestyle based on the collection of plant foods, primarily acorns. Fishing and trade were also important components of Salinan society. The Tulare Yokuks were the Salinans main trading partners, while limited trade was conducted with the Chumash to the south.

The Chumash and Salinan aboriginal way of life ended with Spanish colonization. As neophytes brought into the mission system they were transformed from hunters and gatherers into agricultural laborers and exposed to diseases to which they had no resistance. By the end of the Mission Period in 1834, both the Chumash and Salinan populations had been decimated by disease and declining birthrates. Population loss as a result of disease and economic deprivation continued into the next century. Still today many people proudly claim Chumash and Salinan ancestry and take an active interest in promoting their culture and protecting archaeological evidence of their ancestors.

Archaeological data indicate that the central and southern coastal areas of California have been occupied for at least the past 9,000 years. The prehistory of the Santa Barbara and San Luis Obispo regions has been divided into three periods; Early, (8000 to 3350 Before Present [B.P.]). Middle, (3350 to 800 B.P.)and Late, (800 to 150

B.P.). The Early Period is characterized by a primarily seed processing subsistence economy. The Middle Period is marked by a shift in the economic/subsistence focus from plant gathering and the use of hard seeds, to a more generalized hunting-maritime-gathering adaptation. The full development of the Chumash culture, one of the most socially and economically complex hunting and gathering groups in North America, occurred during the Late Period.

Only during the historic era have definite relationships been established between the Coastal Chumash and the Inland Chumash. Understanding of the Chumash regional relationships between themselves, and neighboring tribes, requires comparative analysis of deposits such as those within the Estero planning area with sites much further afield. The Estero Area deposits must, therefore, be viewed not as individual features, but as elements of a larger picture.

b. History.

In 1769, Gaspar de Portola led a Spanish exploratory expedition into the San Luis Obispo County area. Three years later, in 1772, the Mission San Luis Obispo de Tolosa was founded by Father Junipero Serra. In 1797, the Mission San Miguel Archangel was built. These missions recruited primarily Chumash and Yokut Indians as neophytes and laborers.

Spanish rule in Alta California came to an end in 1821 with Mexican Independence. The missions were secularized in 1832. The breakup of the San Luis Obispo mission resulted in a dispersion of the Obispeño Chumash, whose numbers had already been decimated by disease. However, the Chumash did not simply disappear, either as a people or as a culture following secularization of the mission system. Many went to work on the new ranchos, others took up residence around the missions, several intermarried with Mexican citizens, some returned to existing villages, and a few became property owners. Descendants of Chumash families whose names can be found on the San Luis Obispo Mission register live in the county today. While no full-blooded Chumash remain, many people proudly claim Chumash ancestry and take an active interest in promoting their culture and protecting archaeological evidence of their ancestors.

Following independence, the Mexican government of Alta California began granting large pieces of land to Mexican citizens. During Mexican rule, missions declined in influence and large cattle ranches (called ranchos) came into dominance in San Luis Obispo County.

After the 1848 Treaty of Guadalupe Hidalgo, by which Mexico relinquished Alta California to the United States, the American Period began in California. Sheep and cattle grazing, whaling, logging, mining and dairies were the major industries in the Estero planning area. Over time, the whaling industry, timber, and mineral resources diminished and left the planning area with agriculture and tourism. Today, tourism is the driving economic force of the Estero Area.

c. Significant Recorded Sites in the Estero Planning Area.

An inventory of recorded archaeological sites has been compiled from the files of the Central Coast Information Center (CCIC), Institute of Archaeology, University of California at Santa Barbara in 1994. The CCIC is the official repository for all data concerning San Luis Obispo County surveys, site records, excavation reports, and relevant literature. In the years intervening between 1994 and the present day, the County has continued to record archaeological survey results for various projects requiring land use permits and has therefore continuously updated their maps and records of archaeological resources[1]. Based on archaeological site locations, a sensitive area designations map has been prepared and is available for review by authorized persons only at the San Luis Obispo County Government Center. The adequacy of the summary of known resources that follows is conditioned by certain constraints.

- The majority of the planning area has not been examined for archaeological resources;

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[1] Nancy Orton, planner, County of San Luis Obispo. Personal communication, July, 2003.

- Much of the previous archaeological research methodology does not meet current professional standards;

- Sites known to local or nonprofessional researchers may exist which have not been recorded.

In the following discussion, the absence of a designated archaeological site in a given area does not necessarily imply that none is present. The known distribution must be compared against the location of surveys conducted according to current professional standards before an area can be evaluated as containing low potential for cultural resources.

d. Archaeological Sites.

A CCIC record search conducted in 1994 and surveys conducted since that time have identified over 230 recorded archaeological sites within the Estero planning area boundaries. The prehistoric sites comprise the range of predictable resources: milling stone sites, villages, cemeteries, camps, pictographs, shell processing stations, and lithic scatters. The majority of the prehistoric sites identified are located within the general vicinity of the coast and/or creeks. The majority of the archaeological surveys conducted within the planning area have also been located within the coastal area. Given the high density of prehistoric sites along the coast it is probable that some of the nineteenth and early twentieth century coastal residences and early commercial buildings overlie subsurface prehistoric resources. The distribution patterns of archaeological sites within the more inland portions of the Estero planning area is not well understood because of the virtual lack of archaeological investigations conducted throughout this area.

Archaeological reconstructions and interpretations rely on data from many deposits. Individual deposits are often task specific and contain relatively little data. However, knowledge of such sites is critical to full understanding when regional overviews are being constructed. Accordingly, the archaeological sites within the entire Estero Area must not be viewed as individual deposits, however important in their own right, but as pieces of an overall picture which is not only has wide geographic extent but great time depth as well.

Archaeologic sites in the Estero planning area, especially near the coast, are abundant. This area was heavily populated by Native Americans and many more sites remain yet undetected. For this reason, great sensitivity to these resources are in order. Archaeology is non-renewable, once lost these sites are gone forever. Protection and preservation of this very rich heritage is merited, as is the recognition of our ancient past.

e. Historic Sites.

A number of significant historic resources have been identified in the Estero Area. These include a California State Landmark and significant local resources. No National Landmarks have been identified within the Estero Area.[2] The adequacy of the summary of known historic resources which follows this discussion is limited for the same reasons described above in this section.

Based on the following list, the absence of a designated historical site in a given area does not necessarily imply that none is present. The known distribution must be compared against the location of surveys conducted according to current professional standards before an area can be evaluated as containing no potential for historical resources.

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2 http://www.nr.nps.gov/nrloc1.htm (Search for San Luis Obispo, CA 7/18/03)

- *California Historical Landmarks*[3]
  -Morro Rock - Landmark #821

- *San Luis Obispo County Significant Historic Resources*[4]
  -Canet Adobe
  -Spooner Residence
  -Los Osos Schoolhouse
  -Captain James Cass House Complex
  -Cayucos Pier

Any area has the potential to host unrecorded historic sites. Any structure over 50 years in age is considered to have the potential for historical value.

5.12.1.2 Regulatory Setting

a. San Luis Obispo County Standards.
The protection of cultural resources within the county is influenced by policies and guidelines presented in both the Coastal Zone Land Use Ordinance (CZLUO) and the Coastal Zone Framework for Planning (CZ Framework). Following is a summary of standards and procedures related to archaeological resources.

1. *Coastal Zone Land Use Ordinance.* The Coastal Zone Land Use Ordinance (CZLUO) contains policies, standards, and processing requirements pertaining to archaeological resources. Discretionary projects are subject to environmental review, which may be subject to additional measures when adverse impacts to a historic or archaeological resource have been identified.

The current archaeological standards in the CZLUO include:

- Preliminary site survey shall be conducted by an archaeologist knowledgeable in Chumash Indian culture and approved by the Environmental Coordinator prior to issuance of a land use or construction permit for development within an archaeologically sensitive area.

- If the preliminary site survey determines that proposed development may have significant effects on existing, known or suspected archeological resources, a plan for mitigation shall be prepared by the archaeologist. The plan may recommend the need for further study, subsurface testing, monitoring during construction activities, project redesign, or other actions to mitigate the impacts on the resource.

- Mitigation measures for significant sites may include site avoidance, Phase II testing, Phase III excavation, burial of site under a blanket of sterile fill, and monitoring of earth-moving activities in the vicinity of the site.

- In the event archaeological resources are unearthed or discovered during any construction activities, the following standards apply:

  - Construction activities shall be temporally halted or redirected and the County Environmental Coordinator shall be notified. The extent and location of discovered materials will be recorded by a qualified archaeologist and disposition of artifacts will be accomplished in accordance with state and federal law.

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3 http://ceres.ca.gov/geo_area/counties/San_Luis_Obispo/landmarks.html (accessed 7/18/03)

4 San Luis Obispo County Department of Planning and Building, *Draft Estero Area Plan*, 2003.

- In the event archaeological resources are found to include human remains or in any other case when human remains are discovered during construction, the County Coroner shall be notified in addition to the Environmental Coordinator so proper disposition may be accomplished. If the remains are determined to be Native American, then the County Coroner must notify the Native American Heritage Commission within 24 hours of the discovery.

A number of standards have been proposed as part of the concurrent CZLUO amendment package proposed for the Coastal Zone in San Luis Obispo County which address archaeological resources. The EIR cannot rely on these standards and policies as mitigation because they are not included in the Area Plan Update and are not yet approved; however, they provide information regarding County-led efforts to further protect archaeological resources in the Coastal Zone.

G. Archaeological Resources

1. Protection of Resources Not Within the Archaeologically Sensitive (AS) Combining Designation. All land use permit applications that proposed development within 100 feet of the bank of a coastal stream (as defined in the CZLUO), or within 300 feet of such stream where the slope of the site is less than 10 percent, shall be subject to the standards for the combining designation in the CZLUO and in this plan (see the following standard).

2. Protection of Resources Within and Outside of the AS Combining Designation. Development proposed by land use permit applications that are included in the combining designation or are subject to the preceding standard shall protect archaeological resources as follows.

   a. Additional Study Needed. If the preliminary site survey required by Chapter 23.07 recommends further study or subsurface testing, development shall not be approved until the additional study or testing has been completed to the satisfaction of the Environmental Coordinator.

   b. Priority for Mitigation. Highest priority shall be given to avoiding disturbance of sensitive resources. If disturbance of sensitive resources. If disturbance of such resources can not be avoided, the impacts of development shall be mitigated in accordance with the standards in Chapter 23.07 of the CZLUO. As a last resort, the review authority may permit use of fill to cap sensitive resources or recovery of those resources.

The paragraphs excerpted above constitute draft language as of July 2003. Minor changes to these standards in terms of language and format to reflect the convention of the CZLUO may be made prior to finalization of the amendment package.

2. *San Luis Obispo County Local Coastal Plan Policies Document.* This document includes policies that are part of the County's Local Coastal Plan. Six sections contained in the Archaeology section of this document pertain to the treatment of archaeological resources. These policies are described below:

- Policy 1 - Protection of Archaeological Resources states that the County shall provide for the protection of both known and potential archaeological resources.
- Policy 2 - Vandalizing of Resources states that activities other than development which could damage or destroy archaeological sites shall be prohibited.
- Policy 3 - Identification of Archaeological Sites states that the county shall establish and maintain archaeological site records of data files about known sites.
- Policy 4 - Preliminary Site Survey for Development within Archaeologically Sensitive Areas states that development within designated areas shall have a preliminary site survey performed by a qualified archaeologist prior to a determination of the potential environmental impacts of the project.

- Policy 5 - Mitigation Techniques for Preliminary Site Survey before Construction requires the mitigation of impacts to sites which contain archaeological resources.
- Policy 6 - Archaeological Resources Discovered during Construction or through Other Activities states that when archaeological resources are discovered during construction, all activities shall cease until a qualified archaeologist can determine the significance of the resource and submit alternative mitigation measures.

3. *County of San Luis Obispo Department of Planning and Building's Environmental Division.* Supplementing the above section are the following County Environmental Division's existing archaeological policies:

- Review discretionary permits on a case-by-case basis.
- Projects in the Estero planning area that appear to have characteristics indicative of Native American use are required to complete a Phase I surface survey.
- If archaeological resources are found, mitigation is required. Subsurface investigation may be necessary to determine the site's extent and/or significance.
- Mitigation measures for significant sites may include site avoidance, Phase II testing, Phase III excavation, burial of site under a blanket of sterile fill, and monitoring of earth- moving activities in the vicinity of site.

4. *County of San Luis Obispo General Plan Historic Element.* The County is very interested in preserving its many older buildings and historic sites which not only represent the heritage of San Luis Obispo County but also help define the character of the Estero Area today.

The Historic Element, which is a part of the County's General Plan, includes recommendations for the preservation of historic resources. These recommendations have been incorporated into the Land Use Element. The Historic Site combining designation is applied to areas of the county by the Official Maps of the Land Use Element to recognize the importance of archaeological sites and historic sites, structures, and areas important to local, state, or national history. These standards are intended to protect archaeological resources, historic structures, and sites by requiring new uses and altering existing uses to include preserving and protecting those resources. For applicability of standards and permit and processing requirements, see Chapter 7 of the San Luis Obispo County CZLUO and the Local Coastal Plan Policies Document.

b. State of California Standards.

In addition to San Luis Obispo County standards, the State of California has provisions in the California Environmental Quality Act (CEQA) statutes, the California Public Resources Code, and the California Coastal Act for the protection and preservation of significant archaeological resources. According to the State CEQA Guidelines, a cultural resource shall generally be considered to be "historically significant" if the resource meets the criteria for listing on the California Register of Historic Resources (Pub. Res. Code Sec. 5024.1, Title CCR, Section 4852) including the following:

(A) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
(B) Is associated with the lives of persons important in our past;
(C) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
(D) Has yielded, or may be likely to yield, information important in prehistory or history.

The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to section 5020.1 (k) of the Public Resources Code), or identified in an historical resources survey (meeting the criteria in section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code sections 5020.1(j) or 5024.1.

If the project may cause damage to a significant archaeological resource, the project may have a significant effect on the environment. Section 15064.5 of CEQA pertains to the determination of the significance of impacts to archaeological resources that may be adversely affected by project development in Section 15126.4. Achieving CEQA compliance with regard to treatment of impacts to significant cultural resources requires that a mitigation plan be developed for the resource(s). Preservation in place is the preferred manner of mitigating impacts to archaeological resources.

Section 5097.9 of the California Public Resources Code stipulates that it is contrary to the free expression and exercise of Native American religion to interfere with or cause severe irreparable damage to any Native American cemetery, place of worship, religious or ceremonial site, or sacred shrine.

Section 30244 of the California Coastal Act states: "Where development would adversely impact archaeological or paleontological resources as identified by the State Historic Preservation Officer, reasonable mitigation measures shall be required."

5.12.2 Significance Thresholds

Applicable laws and regulation for dealing with historical properties are outlined in the State CEQA Guidelines and Public Resources Code Section 21084.1 and 21083.2. Under CEQA, the impacts on historical and prehistoric resources must be considered. The State CEQA Guidelines state that a project normally has a significant impact on the environment if it will:

- Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5;
- Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5;
- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature; or
- Disturb any human remains, including those interred outside of formal cemeteries.

A substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.

Impacts are also considered significant if the implementation of the plan would be inconsistent with policies and plans protecting archaeological resources.

5.12.3 General Types of Impacts

Events that have an adverse impact on cultural resource deposits can be broadly grouped into four categories: natural, primary, secondary, and combination. Natural impacts are those caused by nature. Erosion is the most typical example. Mass wastage in the form of landslides can also pose threats to cultural resources.

Natural impacts also occur due to decay of cultural resource remains. Bone and plant material, often found in late sites, is subject to natural decay and will degrade over time. Evidence of natural decay is seen whenever older sites are excavated and only stone material is recovered. Organic material would have been present in most of these older sites, but has been so degraded by natural decay that it can no longer be recognized or recovered using current excavation techniques.

Primary impacts are those which are caused by the direct activity of man. Agricultural activities such as plowing and disking disturbs the upper portions of deposits and causes dislocation and breakage. Fragile exposed artifacts can be dislocated from their natural original location as a result of grazing or agricultural activities.

Secondary impacts are closely related to primary impacts and are generally associated with increased development within an area. These include increased pedestrian, equestrian, and motorized vehicle traffic. The increased traffic would result in greater risk to the cultural deposits by subjecting them to potential vandalism, inadvertent damage, and illegal collecting. All of the cultural deposits within and near the Estero planning area's more developed areas are currently subject to serious indirect impacts and this threat will continue to grow as area development continues.

Combination impacts are difficult to quantify and often subtle. An example of a combination impact is the increased erosion of a deposit as a result of increased water runoff from new development in a given area.

5.12.4 Proposed Project Impact Analysis & Mitigation Measures

5.12.4.1 Area-Wide Impacts

Special Policies, Programs & Standards Proposed by the Area Plan Many of these provide mitigation to impacts that could result from development under the Estero Area Plan. **NOTE: subsequent modification or elimination of the policies cited in this section may modify the conclusions of this EIR.**

- Combining designations- Special overlay categories applied in areas of the county with hazardous conditions or special resources (e.g., Historic Site (H) for Canet Adobe, Spooner Residence, Los Osos Schoolhouse, Captain James Cass House, and Cayucos Pier). Refer to Section 5.12.1.2(a)(1) of this EIR for a discussion of the draft standards and policies related to combining designations proposed for addition to the CZLUO. The CZLUO amendment is proceeding concurrent with, but separate from, the Estero Area Plan Update; therefore, the policies and standards cannot be considered mitigation in this EIR.

Impact CR-1: Disturbance of Prehistoric Resources in the Archaeologically Sensitive Areas of the Estero Planning Area.

Implementation of the proposed Area Plan would result in increased population and new development as described in Section 3.0, "Project Description". Buildout under the proposed Area Plan could result in disturbance to prehistoric resources in the Estero planning area. Over two hundred prehistoric sites have been identified throughout the Estero Area. Many of the sites have been recorded along the coastline and creek corridors. Disturbance of these resources could occur as a result of ground disturbing activities such as grading or excavating, increased pedestrian, equestrian, or bicycle traffic from recreation activities, and agricultural activities. Because the value of archaeological resources often depends on their integrity, activities related to project implementation that may disturb buried prehistoric resources could render them insignificant. If significant buried resources are present and are disturbed as a result of project implementation, such disturbance would be considered a significant impact. The proposed CZLUO amendment package outlined in Section 5.12.1.2(a)(1) includes standards for protecting archaeological resources throughout the Coastal Zone. However, the CZLUO amendment is a separate project for CEQA purposes and had not yet been adopted at the time of this writing. Mitigation is therefore recommended to reduce impacts to a less than significant level.

Impact CR-2: Disturbance of Unknown Resources on Unsurveyed Portions of the Estero Planning Area.

Ground disturbing activities such as grading, excavating, and plowing, associated with buildout of the proposed Area Plan could uncover previously undiscovered resources in unsurveyed portions of the Estero area. As described in the "Setting" section above, the majority of the Estero planning area has not been subjected to Phase I surveys for archaeological resources. Disturbance of previously undiscovered resources would be considered a significant impact. The proposed CZLUO amendment package outlined in Section 5.12.1.2(a)(1) includes additional standards for protecting archaeological resources throughout the Coastal Zone. However, the

CZLUO amendment is a separate project for CEQA purposes and had not yet been adopted at the time of this writing. Mitigation is therefore recommended to reduce impacts to a less than significant level.

Impact CR-3: Disturbance of Known and Unknown Historic Resources in the Estero Planning Area.

The Estero Area contains known historical resources and California Historical Landmarks including Morro Rock, Canet Adobe, Spooner Residence, Los Osos Schoolhouse, the Cayucos Pier and Captain James Cass House. Implementation of the proposed Area Plan would result in the possible disturbance of documented or undocumented historical resources. Assessment of potential impact to historic resources is a function of normal CEQA review for development projects. Therefore, impacts will be adequately addressed on a project-specific level.

Impact CR-4: Damage or Destruction of Known or Unknown Archaeological Sites Resulting from Indirect Effects.

Implementation of the proposed area plan could result in indirect impacts to both recorded and unknown archaeological resources. As described previously, indirect impacts can include but are not limited to vandalism, erosion, and illegal collecting of cultural materials. Because the value of archaeological resources often depends on their integrity, new development and increased recreational activities resulting from increased population could result in indirect disturbances to archaeological resources that render them insignificant. Indirect impacts could also disturb burials which are of particular significance to the local Native American community. Therefore, this impact is considered significant and unavoidable. Mitigation Measure CR-2 in addition to the proposed policies, programs, and standards of the Estero Area Plan would reduce this impact. These impacts are generally beyond the scope of an area plan to prevent.

Impact CR-5: Consistency with Coastal Zone Policies Protecting Archaeological and Historic Resources.

Implementation of the proposed area plan may result in impacts to archaeological and historical resources located in the Coastal Zone. Section 30244 of the California Coastal Act states: "Where development would adversely impact archaeological or paleontological resources as identified by the State Historic Preservation Officer, reasonable mitigation measures shall be required." Reasonable mitigation measures will be determined on a case-by-case basis as resources are discovered through site-specific survey. The Area Plan, however, does not outline guidelines for addressing archaeological resources. Mitigation is recommended to ensure consistency with the intent of the referenced section of the Coastal Act.

5.12.4.2 Community-Specific Impacts

a. Rural Area

Special Policies, Programs & Standards Proposed by the Area Plan

- None specific to the Rural Area are proposed. See "Area-wide Impacts" section above for further discussion of proposed policies, programs, and standards for the Area Plan.

Implementation of the proposed Area Plan would not result in substantial new development in the Rural Estero area. As described in Section 3.0, "Project Description", the land use patterns proposed in the proposed Estero Area Plan are similar to those described under the existing area plan. Proposed policies, programs, and standards of the Area Plan support the permanent protection and management of the county's significant marine resources and emphasize protection of the Morro Bay estuary. However, any ground disturbing activities resulting from buildout under the proposed Area Plan could result in disturbance to buried prehistoric or historic resources as

described under "Area-wide Impacts" above. Impacts and mitigation measures would be similar to those described under the "Area-wide Impacts" discussion above.

b. Cayucos

Special Policies, Programs & Standards Proposed by the Area Plan

- Proposed Program. Cayucos Pier. The county should work with the State to develop interpretive facilities to identify and explain the historic significance of the Cayucos Pier. Also, see "Area-wide Impacts"section above for further discussion of proposed policies, programs, and standards for the Area Plan.

Implementation of the proposed Area Plan could result in disturbances of cultural resources as described in the "Area-wide Impacts" section above. Proposed land use categories would not change substantially. Under the proposed Area plan, approximately two acres of land would be rezoned from Recreation to Commercial Retail and Residential Multi-Family.[5] Approximately 10 acres of land in the Agricultural land use category have been removed from agricultural preserve status by the property owner and are proposed to be rezoned to Residential Multi-Family. Impacts related to ground disturbing activities and new construction activities within portions of the Estero planning area would be similar to those described under "Area-wide Impacts" above. Impacts and mitigation measures would be similar to those described under the "Area-wide Impacts" discussion above.

c. Los Osos

Special Policies, Programs & Standards Proposed by the Area Plan

- None specific to Los Osos are proposed. See "Area-wide Impacts"section above for further discussion of proposed policies, program, and standards for the Area Plan.

Implementation of the proposed Area Plan could result in intensification of land uses in Los Osos. Proposed land use category changes includes increases in acreages of the Open Space, Public Facilities and Commercial Retail land use categories. Land use intensification would result in disturbances to archaeological resources. Impacts to cultural resources and mitigation measures would be similar to those described under the "Area-wide Impacts" section above.

A number of the larger undeveloped parcels on the northern part of Los Osos, especially near the creek and the Morro Bay Estuary, have known archaeological resources, some of county-wide significance. It is anticipated that construction of the sewer will require extensive monitoring and mitigation in this area. In fact, archaeology is anticipated to require the majority of resources for monitoring during that project because of the likelihood of sites occurring throughout Los Osos. Phase I surveys are generally necessary throughout this area.

d. Other Watershed Area

Special Policies, Programs & Standards Proposed by the Area Plan

- None specific to the Other Watershed Area are proposed. See "Area-wide Impacts"section above for further discussion of proposed policies, program, and standards for the Area Plan.

Implementation of the proposed Area Plan in the Other Watershed Area could result in impacts to cultural resources as described under the "Area-wide Impacts" discussion above. Impacts and mitigation measures

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5 *Cayucos Urban Area, land use categories, proposed changes.* [MAP]. County of San Luis Obispo Department of Planning and Building.

related to archaeological resources would be similar to those described under the "Area-wide Impacts" discussion above.

e. Cayucos Fringe

Special Policies, Programs & Standards Proposed by the Area Plan

- None specific to the Cayucos Fringe are proposed. See "Area-wide Impacts"section above for further discussion of proposed policies, program, and standards for the Area Plan.

Implementation of the proposed Area Plan in the Other Watershed Area would be similar to that as described under the "Area-wide Impacts" discussion above. Impacts and Mitigation Measures related to archaeological resources would be similar to those described under the "Area-wide Impacts" discussion above.

5.12.4.3 Mitigation Measures

Along with the existing CZLUO provisions, the following general measures would mitigate general impacts of development in unincorporated portions of the Estero planning area to less than significant levels.

Mitigation Measure CR-1: Mitigation for archaeological resources suggests a program for discretionary requirement of surveys for projects that have the potential to disturb archaeological resources. The reader should note that the following represents the current practice of the County in determining archaeological sensitivity for specific projects.

The Environmental Division should employ a presumption that all project sites within the planning area are sensitive unless site features would indicate otherwise.

Continue to utilize procedures employed by the Environmental Division for protection of archaeological resources as described above. These can be summarized as follows:

- Review discretionary permits on a case-by-case basis.
- Projects in the Estero planning area that appear to have characteristics indicative of Native American use are required to complete a Phase I surface survey.
- If archaeological resources are found, mitigation is required. Subsurface investigation may be necessary to determine the site's extent and/or significance.
- Mitigation measures for significant sites may include site avoidance, Phase II testing, Phase III excavation, burial of site under a blanket of sterile fill, and monitoring of earth- moving activities in the vicinity of site.

Because of the sensitivity of resources in the Estero planning area, all development activities that require ground disturbance (no matter what type of activity) should be carefully reviewed by the Environmental Division for the possibility of archaeological resources. The Environmental Division should consider the following when deciding whether a project merits further archaeological investigation:

- the project lies on relatively flat land (not on steep slopes)
- is relatively undisturbed
- is within proximity and reasonable access to a water source
- is proximate to rock outcroppings
- is near the conjunction of multiple habitat types
- is near other recorded sites

Mitigation Measure CR-2. All archaeological (and, when appropriate, historical) information should be maintained in a secure and confidential manner to minimize the potential for improper investigations and vandalism of cultural resources.

Mitigation Measures CR-3. If the proposed amendments to the CZLUO are not approved, a functional equivalent of such language shall be incorporated into the Estero Area Plan.

5.12.5 Residual Impacts

With the implementation of the mitigation measures listed above, project-specific impacts to cultural resources would be reduced to less than significant levels except for impacts associated with indirect disturbance of undiscovered cultural resources.

5.12.6 Cumulative Impacts

Because the proposed Estero Area Plan is a document which encompasses all development that may occur throughout the Estero planning area, cumulative impacts to cultural resources are the same as project impacts.

6.0 Other CEQA Sections

6.1 Cumulative Impacts

The CEQA Guidelines Section 15355 defines cumulative impacts as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts". Further, "the cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time".

As a practical matter, an EIR on an area plan is an assessment of the cumulative impacts of development within the area covered by the plan. An area plan is considered a planning document that is designed to evaluate areawide conditions. The Estero Area Plan sets forth the goals, policies, assumptions, guidelines, and implementation measures that will guide development of the area to at least the year 2020; this EIR on the Area Plan evaluates the impacts of such development.

The cumulative effects of growth in the Estero Area Plan include the following:

- an increase in the number of dwelling units and a loss of agricultural land in the Estero planning area;
- inducement of growth in the Estero planning area by providing guidance for growth until 2020;
- an increase in population from the 2003 estimate of 18,470 (in the Los Osos, Cayucos, and Rural Area) to a buildout capacity population of 26,171;
- an increase in dwelling units from the 2003 estimate of 8,971 (in the Los Osos, Cayucos, and Rural Area) to a buildout capacity of 11,210;
- an increase in traffic within the Estero planning area;
- an increase in demand for water resources;
- an increase in air emissions within the Estero planning area;
- an increase in traffic noise within the Estero planning area; and
- Loss of native plant communities including oak woodlands associated with wildlife habitat.

Most of the mitigation measures proposed and recommended to reduce significant impacts are goals and policies that apply to the entire Estero planning area. Most of the cumulative impacts associated with development of the Estero planning area would be mitigated through implementation of the goals and policies of the proposed Estero Area Plan.

6.2 Growth Inducing Impacts

The CEQA Guidelines (Section 15126(g)) require that an EIR evaluate the growth-inducing impact of a proposed action. The Guidelines define a growth-inducing impact as "the way in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are [public works] projects which would remove obstacles to

population growth. Growth is not assumed to be necessarily beneficial, detrimental, or of little significance to the environment."

The environmental effects of a proposed project's induced growth are secondary or indirect impacts. Secondary effects of growth can result in significant increased demand on community and public service infrastructures, an increase in traffic, noise, degradation of air and water quality, and agricultural land conversion to urbanized uses.

The Estero Area Plan policies and land use categories would guide future growth in the Los Osos, Cayucos, and Rural Estero areas through the year 2020. Implementation of the proposed Area Plan is intended to not specifically induce growth but to manage and plan for new development in the Estero planning area. The proposed Estero Area plan provides many policies that encourage orderly growth in the Los Osos, Cayucos, and Rural Estero areas.

Buildout under the proposed Area Plan would foster economic and population growth because the plan's purpose is to guide the development of the area until at least the year 2020. Further, the construction of additional housing is encouraged by the Area Plan because the proposed Area Plan sets forth guidelines that are intended to encourage the construction of additional housing in compliance with the policies of the plan. Additionally, construction of the Los Osos Sewer Project would remove a barrier to population growth through providing more capacity for wastewater treatment that would ultimately allow for more construction in the Estero area as previously discussed in Section 5.5, "Wastewater Resources".

Population growth in the Estero Area would also require an expansion of services such as police and fire protection, schools, wastewater and septage treatment, solid waste disposal, and extending existing roadway networks to serve residential and commercial development throughout the Estero planning area. These issues are discussed in Section 5.7, "Public Services".

6.3 Significant and Unavoidable Impacts if Estero Area Plan is Implemented

According to Section 15126(b) of the CEQA Guidelines, the purpose of this section is to "describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described."

The significant effects of the proposed Estero Area Plan are identified in Sections 5.1 through 5.13 of this EIR. Mitigation measures identified in those sections would reduce all of the significant impacts to a less than significant level, except for impacts associated with water supplies, biological resources, traffic, aesthetics and cultural resources.

6.4 Significant Irreversible Environmental Changes

Section 15126 of the CEQA Guidelines requires that an EIR identify any significant irreversible changes associated with a proposed project. Such changes typically include use of non-renewable resources or land use changes that would preclude other types of development in the future.

Continued development of the Estero planning area in accordance with the draft area plan would result in a permanent change as urbanization continues on land that is presently vacant or underutilized. Although these changes will be permanent, they are not considered adverse. The irreversible commitment of non-renewable resources includes, but is not limited to:

- The conversion of vacant land to urban uses within existing urban areas.

- The conversion of agricultural land to other non-agricultural uses.
- The consumption of building materials for roads, structures and infrastructure.
- The continued use of energy resources for heating and transportation.

With exception to the conversion of agricultural land, none of the secondary impacts of increased urbanization is considered a significant irreversible adverse environmental impact.

7.0 Alternatives

The California Environmental Quality Act requires the consideration of a range of alternatives that meet the objectives of the proposed project while reducing or eliminating potential adverse environmental impacts. For a comprehensive land use plan revision, the range of alternatives is similar in scope to the proposed Area Plan, but reflects different land use and buildout scenarios. The analysis of alternatives can be especially useful to decision-makers in their task of balancing the goals and objectives of various general plan alternatives with their respective adverse environmental consequences.

The 2000 DEIR identified four alternatives to the 2000 Draft Area Plan: the No Project - No Build Alternative, the No Project - Buildout under the Existing Area Plan Alternative, the Resource Conservation Alternative, and the Economic Diversification Alternative. The Resource Conservation Alternative was considered the most restrictive alternative in the previous analysis.

There have been a number of changes in both the Plan and the existing conditions since the 2000 DEIR. Two items are most pertinent to the alternatives analysis: changes in the Draft Plan which reduce buildout, and changes in the status of properties previously considered "focus areas." The current (2003) Draft Area Plan has been revised in response to public and agency comment, and is now more restrictive in terms of buildout and density than the previous Resource Conservation Alternative (refer to Table 7.0-1). Therefore, in comparison with the previous alternatives, the 2003 Draft Plan could be considered the environmentally superior alternative. The Draft Estero Area plan has responded to potential environmental impacts by reducing density and increasing policies and programs designed to protect resources. While continued development in the area will increase pressure on these resources, the plan has gone to great lengths to be protective, in some instances allowing only what is mandated by the constitution.

Table 7-1: Comparison of New Draft Estero Area Plan With the Prior Alternatives (Totals at Buildout)

	No Project/ No Additional Development (2003)	No Project/ Buildout of Existing Area Plan	Resource Conservation Alternative (2000 EIR)	Economic Diversification Alternative (2000 EIR)	Draft Area Plan (2003)
Single Family Homes	7,455	9,167	9,669	10,374	8,622
Multi-Family Homes	1,516	3,001	2,488	3,033	2,588
Commercial Retail (SF)	556,000	881,856	916,080	1,280,792	842,483
Commercial Service (SF)[1]	226,900	209,905	209,905	209,905	197,900
Business Park (SF)[2]	0	0	314,122	613,052	98,000
Office (SF)	23,000	372,879	123,824	132,857	121,012
Motel (rooms)/Camping Units	251/85	256/165	390/165	598/165	547/165
Population	18,470	28,498	28,924	31,517	26,175

Source: County of San Luis Obispo

1. Does not include Business Parks, which are listed separately.
2. Business Parks are an allowable use in the Commercial Service land use category but are listed separately.

The 2000 Area Plan DEIR applied each of the four alternatives areawide, and in each of four "focus areas" in the community of Los Osos. The focus areas for Los Osos have been modified since the development of the plan. Most of the properties in Focus Area I have been purchased for conservation. Focus Area III has been reduced in scope because of the wastewater treatment plant proposal on the Tri-W site. Focus Area IV has been reduced because of additional conservation purchases and because a different alternative development scenario has been included in the plan. Therefore, an analysis of the focus areas under current conditions is less useful than in 2000. However, the in-depth analysis of each of these properties in the 2000 DEIR aided in the development of the current Draft Area Plan. Information regarding focus areas and the entirety of the previous analysis are therefore incorporated by reference into the record and are included herein as Appendix 7.0.

Due to the changes above, and the extent of the previous alternatives analysis, the alternatives analysis for this Area Plan will be limited to the following: the No Project - No more Development Alternative, the No Project - Continued Development under the Existing Area Plan alternative, and the Morro Shores/Sweet Springs Corridor Alternative. The latter involves a density cluster/conservation corridor approach to development on properties located in the Morro Shores and the Sweet Springs area. This alternative is proposed to reduce impacts primarily to biological resources.

7.1 Description of Alternatives

The analysis compares buildout conditions of the proposed Estero Area Plan with the following three alternatives:

No Project - No Additional Development. CEQA requires that a "no project" alternative be evaluated by a DEIR. Under the No Development - No Project alternative, development would be frozen at levels that existed in 2003 and no additional development would be allowed. In this regard, conditions associated with the No Development alternative are roughly equivalent to the baseline conditions used in the analytical sections of this DEIR. In most circumstances, however, a No Development scenario is unlikely, given legal limitations on maintaining moratoria. On the other hand, the Estero Area is currently facing very strong limits on development because of the RWQCB's prohibition of septic systems in Los Osos, and because of water limits in Cayucos. As discussed in the relevant sections of this DEIR, these restrictions will eventually be lifted. Furthermore, continued moratoria are unrealistic in light of the large number of legal lots remaining in the Estero planning area. A long-term prohibition on development would require either purchase of these lots or the voluntary abstinence from development by the owner.

The environmental consequences of this alternative would be reduced impacts associated with each impact category compared to buildout under the Draft Plan or one of the other alternatives. However, the objectives of the proposed Area Plan update would not be achieved under this alternative.

No Project - Buildout In Accordance With Adopted Area Plan. This "no-project" alternative would result in buildout of the Estero planning area in accordance with the land uses policies, standards and programs currently in place. The existing Estero Area Plan would accommodate more single family and multi-family residences than the draft plan, as well as more retail development. However, the number of motel units accommodated at buildout under the existing area plan would be less than that under the draft plan. The amount of office space accommodated would be much higher than in the draft plan. Impacts associated with traffic, air pollution and the demand for public services would be similar but greater than those associated with the draft plan.

Morro Shores/Sweet Springs Corridor. This alternative would result in creation of a wildlife corridor extending the length of the Morro Shores Mixed Use Area, with connection to the Sweet Springs area (refer to Figure 7.0-1). This alternative is also proposed to protect coastal sage scrub, wetlands and other sensitive habitat. The alternative would also have the benefit of providing pedestrian and other access connections between the central business district and the Baywood and Cuesta areas, as well as connections between recreational uses at

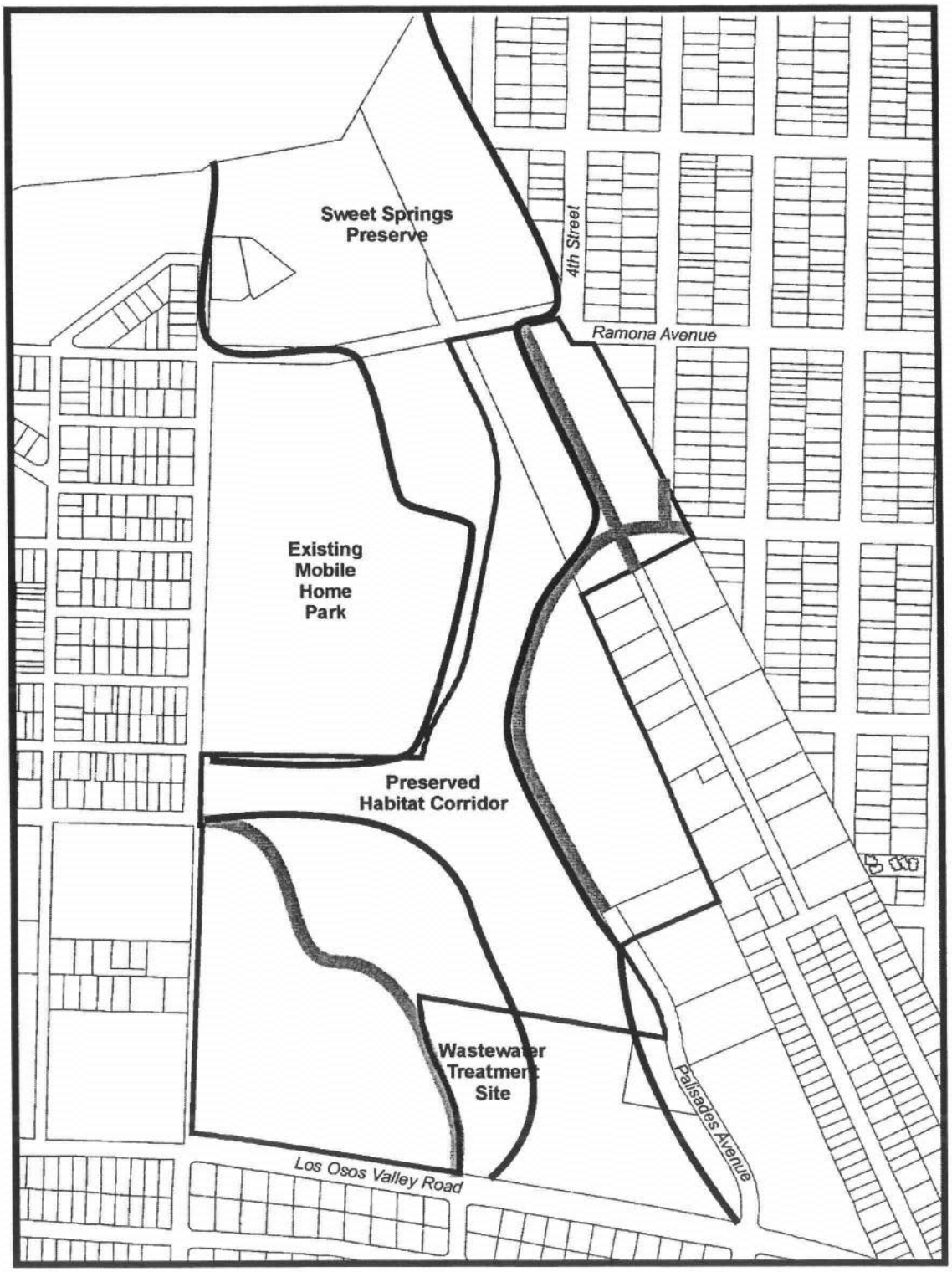


Figure 7.0-1. Morro Shores/Sweet Springs Corridor Alternative
(grey lines denote access connections)

the community park along Palisades Avenue and at the Sweet Springs Preserve. Creation of the corridor will necessitate clustering development on all affected parcels while substantially reducing development potential on some. Overall buildout in the Morro Shores Mixed Use Area would not be reduced under this alternative, however, buildout would be reduced by 48 dwelling units in the Sweet Springs area and west of Morro Shores Mixed Use Area.

Draft Area Plan. The draft area plan is the project evaluated by this Draft EIR, as mitigated by measures recommended for each impact topic. Again, the 2000 Draft Area Plan had considerably higher development potential and greater impacts than the current version of the draft area plan.

7.2 Analysis of Alternatives for the Estero Planning Area

Table 7.0-2 compares buildout conditions associated with the proposed Draft Area Plan with the range of alternatives described above for the entire Estero planning area. The highest total for each land use/population category is shown in bold face type. Generally, the No Project - Continued Development under the Existing Plan alternative accommodates the most intensive urban development with more retail development and single family dwellings than the Draft Plan. The Morro Shores/Sweet Springs Corridor alternative would accommodate the least urban development when compared to the Draft Plan, with the exception of the No Project/No Development alternative that essentially freezes development at 2003 levels.

Table 7-2: Comparison of 2003 Draft Estero Area Plan With Alternatives (Totals at Buildout)

	No Project/No Additional Development	No Project/Buildout of Existing Area Plan	Morro Shores/Sweet Springs Corridor	Draft Area Plan
Single Family Homes	7,455	**9,167**	8,574	8,622
Multi-Family Homes	1,516	**3,001**	2,588	2,588
Commercial Retail (SF)	556,000	**881,856**	842,483	842,483
Commercial Service (SF)	226,900	209,905	197,900	197,900
Business Park	0	0	**98,000**	**98,000**
Office (SF)	23,000	**372,879**	121,012	121,012
Motel (rooms) / Camping Units	251/85	256/165	**547/165**	**547/165**
Population	18,470	**28,498**	25,776	26,175

7.2.1 Comparison of Alternatives By Land Use Category

Overall, the No Project - No Additional Development Alternative results in the least development in each of the land use categories, because it essentially halts development at current levels. Continued buildout under the adopted Estero Area Plan would result in the greatest number of dwelling units, commercial retail and office space, as well as the greatest buildout population among the alternatives. The Morro Shores/Sweet Springs Corridor alternative would result in the second lowest population, due mainly to reductions in single-family homes, but would otherwise be similar to the proposed Area Plan.

7.2.2 Comparison of Alternatives by Environmental Impact

No Project/No Additional Development. This alternative would result in the least environmental impacts across the board, because it would allow no further development.

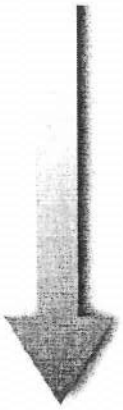
No Project/Buildout of the Adopted Area Plan. This alternative would result in greater impacts overall when compared to the Draft Plan, including traffic, water supplies, and air quality, due mainly to a substantially larger buildout population. The existing plan would result in about 205,200 square feet more non-residential development (not including lodging units) than the Draft Area Plan and would therefore have greater impacts in terms of non-residential development.

Morro Shores/Sweet Springs Corridor Alternative. This alternative would result in slightly less adverse impacts associated with biological resources, traffic, and water supplies when compared to the Draft Plan due mainly to a reduced buildout population. This alternative would result in potential conservation of known sensitive habitat, provision of alternative transportation and recreational opportunities, and lower overall residential development.

Draft Area Plan. The impacts of the Draft Plan are outlined in the EIR.

7.3 Environmentally Superior Alternative

CEQA requires that an EIR identify the "environmentally superior" alternative to further aid decision-makers and the public in assessing the environmental consequences of land use decisions. The analysis provided above suggests the following ranking of the environmental consequences of the alternatives:



Least Impact

No Project/No Development Alternative

Morro Shores/Sweet Springs Corridor Alternative

Draft Plan

No Project/Buildout of Existing Estero Area Plan Alternative

Greatest Impact

When the No Project alternative is identified as the environmentally superior alternative, CEQA requires that the next most environmentally superior alternative be identified. In the case above, the Morro Shores/Sweet Springs Corridor Alternative is the next most environmentally superior alternative.

8.0 List of Preparers / Individuals & Agencies Contacted

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10.0 Response to Comments

This section of the Final EIR (FEIR) presents the responses to public comments made on the Draft EIR. Each letter commenting on the DEIR has been assigned a number, from 1 to 8. Within each letter, comments have been numbered in ascending order. A designation that consists of the number assigned to the comment letter, followed by the comment number, identifies comments and responses. For example, the comment and responses identified as 1-1 represents the first comment in the first letter. Subsequent comments from that letter would be identified as 1-2, 1-3, etc. The second comment letter would commence with 2-1, 2-2, etc. The person making the comment is the "commenter," and is identified before the response. Some comments do not pertain to physical environmental issues, but responses are included to provide additional information for use by decision-makers.

Responses to some comments received by the Coastal Commission are organized in a slightly different fashion. Letter 6 is organized as described above; the letter refers to two attachments, comments received in 2000 on the previous plan and EIR (included herein as letter 7) and periodic review noted from fall 2003 (included herein as letter 8). Comments in letter 7 are broken down into five categories:

- 7-1G, 7-2G, etc. - General Comments
- 7-1L, 7-2L, etc - Comments Specific to Los Osos
- 7-1C, 7-2C, etc. - Comments Specific to Cayucos
- 7-1AR, 7-2AR, etc. - Comments referring to Areawide and Rural Policies
- 7-1E, 7-2E, etc. - Comments Specific to the EIR

Letter 7 is accompanied by five tables that include responses to comments arranged by the categories listed above.

Letter 8 is numbered in the standard fashion.

List of Persons Commenting on the DEIR for the San Luis Obispo County Estero Area Plan

Letter	Commenter(s)	Agency	Date
1	Terry Roberts	State Clearinghouse, OPR	October 17, 2003
2	Al Barrow	Citizens for Affordable and Safe Environment (C.A.S.E.)	October 23, 2003
3	Terence Orton	Westland Engineering	October 24, 2003
4	Carole Maurer & John Dilworth		October 24, 2003
5	Teresa McClish		October 24, 2003
6	Steve Monowitz	California Coastal Commission	November 24, 2003
7 (attachment to letter 6)	Charles Lester	California Coastal Commission	February 25, 2000
8 (attachment to letter 6)	California Coastal Commission	(Periodic Review Notes)	September 29, 2003

Letter 1

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

Gray Davis
Governor

Tal Finney
Interim Director

RECEIVED
OCT 23 2003
Planning & Bldg

October 17, 2003

Nancy Orton
The County of San Luis Obispo
County Government Center
Room 310
San Luis Obispo, Ca 93408-2040

Subject: Estero Area Plan Update
SCH#: 1997051059

Dear Nancy Orton:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on October 16, 2003, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Terry Roberts

Terry Roberts
Director, State Clearinghouse

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

Letter 1
Terry Roberts, State Clearinghouse, OPR

October 17, 2003

1-1 The commenter is acknowledging the receipt of the Draft EIR and its distribution to appropriate agencies for review and comment.

Response: Comment noted.

Letter 2



"Barrow" <abarrow@sbcglobal.net>

10/23/2003 06:50 PM

To: <mwulkan@co.slo.ca.us>
cc: "Richard Parker" <rsparkkp47@aol.com>
Subject: To Mike Wulkan SLO County Planning

Hello Mike Wulkan:
Here is submission of comments/request to the EIR General Plam Estero Update.
Thank You,

Al BARROW CITIZENS FOR AFFORDABLE AND SAFE ENVIRONMENT&COALITION FOR LOW INCOME HOUSING



Morro Shores APN number 074.d

To Mike Wulkan SLO County Planning.
Here are our comments on the EIR and General Plan Update before 5PM Friday

Hello Commissioners and Supervisors;
It seems the Pristine Coastal Dune Scrub cannot be mitigated by Maritime Scrub Chaparral to many environmentalists. Like mitigating Salmon runs with Western Turtle habitat it is not like species. Futher this habitat I scheduled for 414 units (see attached letter from SLO Planning)of development. The corridor for wildlife is also a habitat for many birds including Raptors. The development number is way high and the open space habitat way low. C.A.S.E. suggests the Coastal Conservancy be allowed to retire some of this habitat and cluster the development. And keeping a little of the original character of the site which is presently scheduled to have an Industrial sewer located next door. According to Dr. Dave Chipping, CNPS tho Los Osos Baywood fine sand habitat for rare and endangered plants and animals is the most endangered in the world. California cannot afford to destroy it.
Thank You, Al Barrow C.A.S.E.

2-1

....Morro Shores APN number 074-226-024 East of Tri-W
Hi Al,

Nicole Carter let me know that you had questions about buildout in the "Morro Shores Mixed Use Area." The residential buildout within that area, as shown in Figure 7-61 in the draft plan, is about 414 units. There would also be a potential for a multi-use business park, as described in the planning area standards starting on page 7-153 of the draft plan. The alternative in the EIR to establish a Morro Shores/Sweet Springs wildlife corridor would not affect buildout in the Morro Shores Mixed Use Area, but would reduce buildout on an adjacent property (that could be an expansion of the existing mobilehome park) and on a property in the Sweet Springs Area north of Ramona Avenue.

Please let me know if you have any further questions.

Letter 2
Al Barrow
Citizens for Affordable and Safe Environment (C.A.S.E.)

October 23, 2003

2-1 The commenter is concerned about projected buildout in the Morro Shores Mixed Use Area and its effect on habitat.

Response: The residential buildout in the "Morro Shores Mixed Use Area" as shown in Figure 7-61 in the draft plan, is about 414 units. There would also be a potential for a multi-use business park, as described in the planning area standards starting on page 7-153 of the draft plan. The alternative in the EIR to establish a Morro Shores/Sweet Springs wildlife corridor would not affect buildout in the Morro Shores Mixed Use Area, but would reduce buildout on an adjacent property (that could be an expansion of the existing mobile home park) and on a property in the Sweet Springs Area north of Ramona Avenue. The alternative appears to reflect some of the concerns raised by the commenter. The alternative is considered the environmentally superior alternative in the FEIR.

Letter 3

WESTLAND ENGINEERING, INC.

CIVIL ENGINEERING
LAND SURVEYING
LAND PLANNING

2003 OCT 24 P.M. 4:40

75 ZACA LANE, SUITE 100 • SAN LUIS OBISPO, CA 93401
TELEPHONE:(805) 541-2394 • FAX:(805) 541-2439

October 24, 2003

County Planning Department
County of San Luis Obispo
County Government Center
San Luis Obispo, CA

RE: COMMENT ON DRAFT ESTERO AREA PLAN EIR.

Dear Sirs:

After reviewing the EIR with my clients who are the owners of APN 38-721-29 and 30 we have a comment on the map in the appendix on page 7-17. The map shows an area designated as "D" at the corner of Pismo and South Bay Blvd in Los Osos. We have looked for information within the EIR that discusses the designation, but can find no section reviewing the information. Therefore, it appears that the designation has either not been considered or the map is in error. 3-1

We request that this designation should be removed. 3-2

Thank you for your consideration.

Sincerely yours,

Terence K. Orton

October 30, 2003

Terence K. Orton
Westland Engineering, Inc.
75 Zaca Lane, Suite 100
San Luis Obispo, CA 93401

Dear Mr. Orton:

SUBJECT: ESTERO AREA PLAN UPDATE: NORTHWESTCORNER OF SOUTH BAY BLVD. AND PISMO AVE.

Thank you for your comments regarding property located at the northwest corner of South Bay Blvd. and Pismo Avenue. Your comments will be forwarded to the Planning Commission for its consideration during the public hearings on the area plan update that are tentatively scheduled to begin on December 11, 2003.

In your letter, you express concern about the map on page 7-17 of the Draft Environmental Impact Report that shows area "D" at the northwest corner of South Bay Blvd. and Pismo Avenue as a neighborhood commercial center. This map is part of the appendix, which for reference purposes shows plan alternatives that were considered in the previous Draft Environmental Impact Report. However, **the Public Hearing Draft Estero Area Plan does recommend a zoning change from Residential Single Family to Commercial Retail on this property**, as shown on detail map M18 following Chapter 7. The purpose of this zoning change is to enable, as an option, development of neighborhood-serving commercial retail uses on the property through voluntary participation in the proposed Los Osos community-based transfer of development credits (TDC) program. The planning area standards that implement this idea are standards H1, 2 and 3 and the development guidelines on page 7-135 of the draft plan. If the owner chooses not to participate in the TDC program, then single family dwellings, residential accessory uses and other uses would be allowable, as described in standards G1 and 2 on pages 7-133 and 7-134 in the draft plan.

Please contact me if you have any questions or would like additional information. You may also reach me by phone at 781-5608 or by E-mail at mwulkan@co.slo.ca.us.

Sincerely,

MIKE WULKAN
Senior Planner

Letter 3
Terence Orton, Westland Engineering, Inc.

October 24, 2003

3-1 The commenter represents property owners who are concerned about the designation assigned to their property on a map on page 7-17 of the draft plan.

Response: The parcels referred to by the commenter are located at the northwest corner of South Bay Boulevard and Pismo Avenue in Los Osos. The map on page 7-17 of the Draft Environmental Impact Report shows area "D" in this location as a neighborhood commercial center. This map is part of the appendix, which for reference purposes shows plan alternatives that were considered in the previous Draft EIR. However, the Public Hearing Draft Estero Area Plan does recommend a zoning change from Residential Single Family to Commercial Retail on this property as shown on detail map M18 following Chapter 7. The purpose of this zoning change is to enable, as an option, development of neighborhood serving commercial retail uses on the property through voluntary participation in the proposed Los Osos community-based transfer of development credits (TDC) program. The planning area standards that implement this idea are standards H1, 2 and 3 and the development guidelines on page 7-135 of the draft plan. If the owner chooses not to participate in the TDC program, then single family dwellings, residential accessory uses and other uses would be allowable, as described in standards G1 and 2 on pages 7-133 and 7-134 in the draft plan.

3-2 The commenter requests that the designation assigned to his clients' property on the above-mentioned map be removed.

Response: Comment noted.

Letter 4

EIR Response from Carole Maurer and John Dilworth, October 24, 2003

To: San Luis Obispo County Planning Department
San Luis Obispo County Planning Commission
San Luis Obispo County Board of Supervisors
California Coastal Commission

Subject: Personal response to the Environmental Impact Report of the Estero Area Plan Draft Update of August 2003

I participated in the LOCAC review of the Environmental Impact Report evaluating the Estero Area Plan Draft Update of August 2003. Although there was an oversight by LOCAC in leaving the EIR review off the agenda at the October 23, 2003, meeting, my husband and I are concerned enough about the Morro Shores/Sweet Springs Corridor alternative that we are responding with some of LOCAC's questions and adding a few more of our own, along with our own preferences. They are listed below.

Thank you for your consideration of our concerns.

Carole Maurer and John Dilworth
1652 4th St
Los Osos, CA 93402
(805)528-8018

EIR Response from Carole Maurer and John Dilworth, October 24, 2003

The proposed Morro Shores/Sweet Springs Corridor alternative is discussed in the EIR on pp. 7-2 – 7-4, including the accompanying figure 7.0-1 on p.7-3. The EIR states that this alternative would result in creation of a wildlife corridor extending the length of the Morro Shores Mixed Use Area, with connection to the Sweet Springs area. It is also proposed that it would protect coastal sage scrub, wetlands and other sensitive habitat.

I strongly support such wildlife and vegetation preservation, and also hope it would provide a **safe** pedestrian and bike access between the central business district and the residential areas of Los Osos, Cuesta, and Baywood Park. 4-1

However, I see several inconsistencies in the EIR with reference to the Morro Shores/Sweet Springs alternative that may render it unworkable. 4-2

1. Since there is no accompanying legend to the map in figure 7.0-1, which appears to outline the Morro Shores/Sweet Springs Corridor, it is unclear what the grey area represents – are these new roadways or pedestrian or bike paths? 4-2a
2. The extension of Ravenna from Los Osos Valley Road to Ramona at 4th St. is not shown in the map at all, yet it is indicated as a recommended roadway improvement on p. 5.1-15 and in the EAP. Is it proposed that this corridor not include this extension? 4-2b
3. If this corridor does not include the extension of Ravenna, then what are you recommending as an alternative north-south connection between LOVR and the new residences in the Morro Shores area, if any? We would be in favor of a partial extension of Ravenna from LOVR to new residences, but not all the way to Ramona, as long as there was bike/pedestrian access through the corridor. 4-2c
4. If Ravenna is extended all the way through the corridor, then it is questionable to us just how much this corridor would really protect wildlife and the sensitive habitat. This road would definitely become the preferred connector to Baywood Park, and the traffic, noise, pollution, etc., would make this street and surrounding area no different from any other Los Osos residential neighborhood. 4-2d
5. Also, it is unclear to us how this area could remain a protected wildlife and vegetation corridor with the buildout at the proposed density for this area. We understand the need for new housing, especially multi-family, and agree with the clustering of development on the less sensitive areas in Morro Shores and Sweet Springs. But, a large increase in population would not lend itself to the preservation of this precious area, and we recommend reducing the allowable number of units even more than what was recommended in the EIR. The only way this area could be a wildlife and vegetation corridor is if it were protected from the destruction and man-made pollution resulting from increased population and traffic in the nearby area. 4-2e

Letter 4
Carole Maurer and John Dilworth

October 24, 2003

4-1 The commenters are supportive of the Morro Shores/Sweet Springs corridor alternative presented in the draft plan.

Response: Comment noted.

4-2 The commenters note several inconsistencies in the EIR in reference to the Morro Shores/Sweet Springs alternative.

4-2a The commenters note that it is unclear from the map in Figure 7.0-1 whether the gray portion indicates a bicycle or pedestrian area?

Response: The gray lines reflect alternative traffic routes, which are designed to avoid bisecting the corridor area. Details regarding these alternate routes in terms of providing bicycle and pedestrian access are not developed under the alternative, although development standards contained in the plan would suggest that such facilities would be required as part of a subdivision on the property.

4-2b The commenters would like to know whether the proposed corridor alternative would include the extension of Ravenna from Los Osos Valley Road to Ramona at 4th St. discussed under recommended roadway improvements on page 5.1-15 and in the EAP?

Response: The alternative differs slightly from the circulation plan in that is proposes alternate road routes to protect the corridor. The alternate routes would still provide connection from major roads such as LOVR to more local streets.

4-2c The commenters would like to know that if Ravenna is not extended, what would the connection be between Morro Shores' homes and Los Osos Valley Road?

Response: See 4-2b.

4-2d The commenters state that if Ravenna is extended it will limit the function of the area as a wildlife corridor due to traffic, noise, pollution and the like.

Response: See 4-2b. The alternate routes are proposed to limit impacts associated with traffic and noise on the function of the corridor.

4-2e The commenters are concerned that if would be difficult to maintain the corridor for wildlife and habitat protection with the currently projected buildout numbers.

Response: Comment noted. Design would be guided by cluster development standards contained in the proposed Area Plan designed to maximize protection of sensitive habitat. The FEIR finds that the protection offered by the alternative would be superior to the current plan for the properties.

Letter 5

recv'd
Plng. & Bldg. Dept.
10/24/03

Teresa McClish
364 Main Street, Morro Bay, CA 93442
Phone: (805) 772-7917, Fax: (805) 772- 3803, Email: mcclishmb@msn.com

October 24, 2003

Mr. Mike Wulkan, Senior Planner
Ms. Nancy Orton, Environmental Specialist
Department of Planning and Building
San Luis Obispo County Government Center
San Luis Obispo, CA 93408

RE: Draft EIR for the Estero Area Plan

Dear Mr. Wulkan and Ms Orton:

I am submitting the following comments on behalf of the majority ownership of the 17 acre property known as Cuesta Inlet (APN's 074-084-004, 074-084-012 and 074-084-013). These comments follow previous correspondence (January 2000) submitted by Rob Strong on the 1999 Draft EIR, and will focus on concerns for this area as proposed in the public hearing draft Estero Area Plan and EIR (August 2003).

A proposal for a potential increase in density from 2 residential units to up to 12 units, clustered, for this property has been discussed with County staff and recommended by the Los Osos Community Advisory Council (LOCAC) in their deliberations on the previous draft EAP and EIR. Included in materials presented during these deliberations was a preliminary biological study which is resubmitted now for your reference. This potential maximum density would be consistent with the residential character of the neighboring single-family residential subdivisions and homes that surround the property on three sides. 5-1

Mitigation measure BR-11 in Section 5.8.3.3 refers to Cuesta Inlet and proposes to "eliminate proposed density increases in areas of Endangered Species Habitat" as mitigation for the Class II Impact BR-2 for biological resources. The introduction to section 5.8.3.3 notes that impacts to sensitive habitats and sensitive species should be avoided and/or greatly reduced through project design. We are requesting the Cuesta Inlet property be identified for the previously proposed potential increase in residential density to allow site specific environmental review and mitigation for potential residential development, if it can be supported by a project specific EIR, and facilitation of appropriate coastal recreation and public access to and along the shoreline of the inlet consistent with Combining Designation standard A.1 of the Estero Area Plan. 5-2 5-3

Thank you for consideration of this property in the update process. We look forward to continued discussion and clarification.

Sincerely,

Teresa J. McClish

c: Charles Ogle

Attachments

Minutes LOCAC meeting 9/24/98
Preliminary Biological Study

Los Osos Community Advisory Council [LOCAC]

24 September '98 Meeting Minutes

Secretary: G. Gurley

Agenda Item – Cuesta Inlet Plan (Rob Strong) ::

- Rob displayed a map of the vicinity & passed out handouts – reviewed scope of the project.
  - noted soils constraints – soils report is not complete
  - reviewed the biological constraints
  - issue of State Lands still out there for determination
  - dredging in the '50's created the inlet
  - archeological – expect findings during construction
  - proposal is for home sites to be on ~2ac of total 17acre site; The open space would be given over to some public agency for stuardship
  - sewer system – definite need to support resolution of this issue to support this project's viability
  - no intention for immediate application on this proposed project, need sewer & reciever sites for the OS first.
  - Biology, has constraints
- G.Hensley, reviewed biological report
  - expect about 1 to 1 mitigation, probably offsite due to REC use of site (possibly some mitigation on south side of Inlet if so choose, but wont cover all the required mitigation.
  - will require a habitat conservation plan – snails not a ; Homes sites no. 10, 11 & 12 would represent a habitat taking – likely requiring a 4 to 1 mitigation
  - might be a need to purchase 3 to 4 acres offsite for mitigation
- P.Reynolds, amazing that this Inlet got modified where we are with endangered species
- G.Karner, refresh memory, the corps was not involved on this dredging... it was by the owner of the property at the time (in the '50-s)
- Rob Strong, that's apparently correct
- D.Funk, what's the vision of REC use looking like – boating ??
- R.Strong, yes, we feel its inappropriate for motorized boating
  - seems to be a conflict between LUE Plan – only (1) residence allowed under the current LUE. Vs. if the County bought it – a park for bating access
  - not a formal development request, looking for your feedback to be integrated into a plan amendment – need LOCAC input & support
- R.Knight, does appear to be opportunity for more than just small boating access
- G.Karner, will abstain, but have some questions
  - 1/ what is current zoning allowing?
  - 2/ what did we decide in the update?
  - 3/ on area along the causeway (ie. west end of Mitchell Dr) – lots identified in the assessor's parcel maps don't seem to align w/ the property layout & boundaries in the concept you've outlined
- R.Strong, re. answers –
  - 1/ current zoning text allows for one residence without specific siting
  - 2/ defer to N.Rollman.
  - 3/ true, they are not in agreement – but attempting here to represent a "concept" which may require a lot line adjustment – all this would definitely be addressed in the appropriate LUE amendment process if this project was to go forward
- N.Rollman, re. Gary's second question; This also has the V (visitor) designation... the LUE update though has the same designation & wording as the current LUE
- M.Simkins, ?? REC w/ visitor ?? please elaborate
- N.Rollman, REC w/ passive uses is envisioned – ie. trails, small boat (kayaks, canoes, small sailboats, ect. w/ a launching area
- B.Semonsen, not keen on reviewing a proposal that is possibly not feasible
- R.Strong, will definitely require further soils work before submitting the project development request (ie. coring, evaluation, etal). The Archeologist recommends the areas for home sites be "filled" prior to developing the homes.
- B.Semonsen, what are the Archeological concerns??
- R.Strong, per the archeological consultant, Robert Gibson – its hard to know, but shoreline has proven to be an active site in adjacent portions of our community

- ◊ B.Semonsen, along the shoreline, way down near the south boundary, is where the tailings were placed from the dredging of the bay to create the inlet...
- ◊ D.Funk, fill is normally about 2ft. deep, plus get about 14ft. from fill (if fill is required)
- ◊ R.Strong, REC uses would make sense at the southeast end of the property – good access from Binscarth
- ◊ M.Simkins, any "red flags" from anyone ??
- ◊ G.Karner, were the specifics in the LUE under the REC designation ?? don't remember...
- ◊ R.Strong, passive REC uses are identified there
- ◊ N.Rollman, agreed, that's true
- ◊ R.Knight, you've proposed something more "win—win" here; I'm supportive of the concept
- ◊ P.Reynolds, we've all observed the area become a real "dump site". This concept sounds like a real benefit to the community
- ◊ M.Simkins, agree; one item to tie down (B.Laurent shares this concern) -- ?? ownership ??
- ◊ D.Funk, State Lands ??
- ◊ M.Simkins, yes, do they own it ??
- ◊ R.Strong, yes, that is also a real concern in being able to move forward with this concept – but, it has been taxed and treated as private property for the last 40+ years
- ◊ D.Funk, perhaps one location, or residence site, at the end of Nancy, off Garden is questionable
- ◊ R.Strong, Title Co. claims "private" but will have to meet with State Lands – need soils report (ie. core samples, etal) and archeological evaluation to clarify original shoreline to support this review
- ◊ G.Karner, see Steve Ebry (used to be with the County) or Don Asquith, look for old World War II aerial photos showing the area – they should identify the original shoreline before dredging
- ◊ R.Strong, will have to thread the needle of what REC means as well...
- ◊ B.Semonsen, ?? do you mean "intent" ??
- ◊ R.Strong, the clients ask your support in the update to the LUE (ie. in addressing the restrictions and in the "re-wording" of REC) – we feel that any concerns would be more than offset by the donation of OS in this concept if it were feasible to go forward with it.
- ◊ A.Switzer, essentially last chance to revise the LUE wording... this group has to take action.
- ◊ R.Strong, if LOCAC would support revision of wording from (1) to allow a maximum of 12 homes, dependant on fruther evaluation – that's all we're asking right now
- ◊ B.Semonsen, is it too late for this to go in with the update??
- ◊ N.Rollman, Planning feels it needs to be a separate General Plan amendment at this point. Will check in with M.Wulkan, for establishing a density thru some other part of the LUE update, perhaps a planning area standard.
- ◊ G.Karner, no "gated community" (ie. across the inlet) allowed...
- ◊ D.Wright, don't think we can address except conceptually without a General Plan amendment.
- ◊ N.Rollman, make a motion and I'll take aback to M.Wulkan – will attempt to support as a Planning Area Standard within the context of the LUE update
- ◊ M.Simkins, we did have this conversation with M.Wulkan before – please address with him
- ◊ P.Reynolds, move we recommend Zone REC Planning Area Standard remain as (1) unit of housing but consider should be given to development plan to greater density of residential along with setting aside a majority of the property to passive REC uses

⇒ D.Wright 2nd; discussion:

- R.Knight, hummm, that seems unnecessary
- D.Wright, look at Planning Area Standards,
- P.Reynolds, now indicating we envision another plan could be considered given an application by the owner
- D.Funk, probably sky is the limit, no numbers or guidelines there otherwise BofS would take liberty without restraint
- R.Knight, seems redundant to state this as a motion, it already is the process
- P.Reynolds, we need to note in the Plan that a concept has been considered
- R.Knight, would rather a resolution to support owner if a General Plan amendment is submitted
- P.Reynolds, withdraw motion

Los Osos Community Advisory Council [LOCAC]

24 September '98 Meeting Minutes

Secretary: G. Gurley

- ◊ B.Semonsen, move we look at the Planning Area Standard to allow up to 12 units maximum (on approximately 2 acres) dependent on offer of dedication of 15 acres of the 17 acre property and the environmental constraints
- ⇒ P.Reynolds, 2nd; discussion:
  - A.Switzer, do not feel this is appropriate
  - R.Strong, remember, not a lot of property required for roadways – different from a normal subdivision...
  - G.Karner, don't think there's enough info for LOCAC to make a decision – not going to vote anyway buyt that point needs to be considered
  - D.Funk, need ot determine land ownership – State Lands vs. "supposed" owner that's currently being taxed
  - B.Semonsen, USF&W State F&G will make final determinations...
  - R.Knight, amend to say – "approximately 12 residences"
  - B.Semonsen, accept amendments; P.Reynolds, ditto.
- ⇒ vote: (7) aye, (1) naye, (1) abstention [G.Karner]

P.Reynolds, moved to adjourn --- seconded by D.Funk
adjourn: 2128hrs

respectfully submitted: Geof Gurley

BIOLOGICAL REVIEW
FOR
CUESTA INLET

LOS OSOS/CUESTA-BY-THE-SEA
SAN LUIS OBISPO COUNTY, CALIFORNIA

Prepared for

Strong Planning Services
444 Higuera Street, Suite 201
San Luis Obispo, CA 93401

Prepared By:

G.R. Hensley,
BioEnvironmental Services
P.O. Box 6884
Los Osos, CA 93412

July 1998

TABLE OF CONTENTS

hapter	1.0	PURPOSE AND SCOPE OF REPORT	1
	1.1	Introduction	1
	1.2	Scoping Summary	1
hapter	2.0	PROPERTY DESCRIPTION	1
	2.1	Property Location	1
apter	3.0	ECOLOGICAL FEATURES	3
	3.1	Botanical Features	2
	3.2	Zoological Features	7
	3.3	Wetland Features	10
apter	4.0	ASSESSMENT AND RECOMMENDATIONS	10
		REFERENCES	

LIST OF FIGURES

ure 1	Location Map – Cuesta Inlet	1
ure 2	Botanical Regions, Cuesta Inlet	6
ure 3	Biological Constraints	12

LIST OF TABLES

e 3.0	Special Status Species	3
e 3.1	Plant List	5
e 3.2	Probability of Occurrence: Special Status Animals	9

BIOLOGICAL REVIEW
CUESTA INLET, SAN LUIS OBISPO COUNTY, CA Page 1

1.0 PURPOSE AND SCOPE

1.1 Introduction

The purpose of this report is to characterize the habitat contained on a ±17 acre parcel in Los Osos, California known as Cuesta Inlet.

1.2 Scoping Summary

The scope of this report is confined to the identification of sensitive vegetation and wildlife resources on site. Habitat information is then used to determine biological constraints affecting any potential development of the property. No specific development project has been proposed at this time.

2.0 PROPERTY DESCRIPTION

2.1 Location

Subject property, located in the San Luis Obispo County community of Los Osos/Cuesta By The Sea, is an approximately 17 acre site at Binscarth Road and Doris Avenue. A dredged channel (tidal slough) extension of Morro Bay, known as Cuesta Inlet, exists at this location. (See location map, Figure 1).

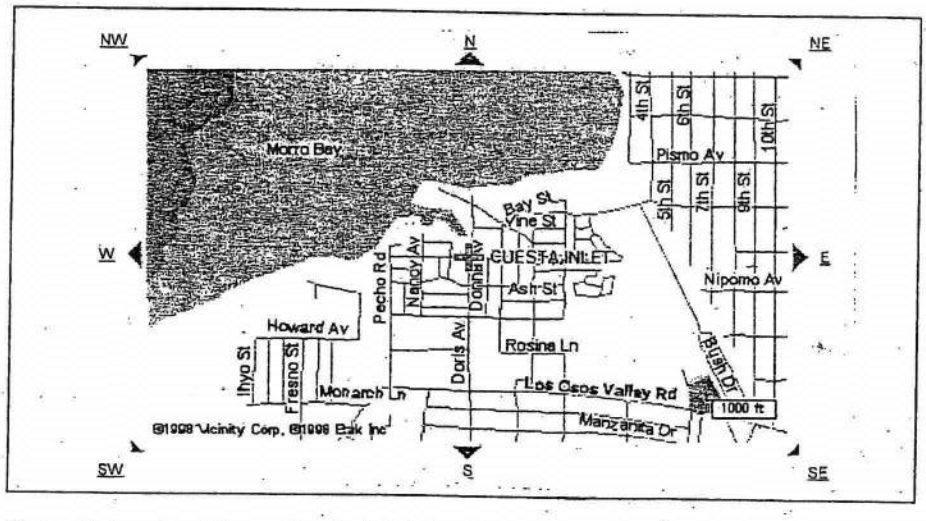


Figure 1. Location Map – Cuesta Inlet, San Luis Obispo County CA

3.0 ECOLOGICAL FEATURES

Site visits were made to conduct field observations during April, May, and June 1998. The main ecological features noted are a man made salt water inlet surrounded by previously disturbed coastal dune scrub habitat. Several species of special concern, known from the vicinity of Cuesta Inlet, are summarized in Table 3.0.

3.1 Botanical Features

Plant Ecologist, Dirk Walters, Ph.D. conducted a botanical survey of the site. The entire property was canvassed on foot and a list of plant species was made (Table 3.1). Herbaceous plant cover will vary seasonally. As a result, assessment of the site during only one season does not allow positive identification of all plant species that might be present. Table 3.1 should not be considered a complete list, but since this study was conducted during the spring the list should represent a significant portion of the plant species occurring at this site. However, a thorough botanical survey during an entire year would be necessary to compile a complete listing of the flora.

Table 3.1 characterizes the property in 5 related plant groupings (regions 1-5):

Region 1 is a previously disturbed area containing upland vegetation and extends from the adjacent houses and roads to within 5 feet of the constructed bay inlet. The dominant plant in Region 1 is *Baccharis pilularis* (Coyote Bush) and *Carpobrotus edulis* (Hotentot fig). This area can generally be described as coastal scrub.

Region 2 is a narrow wetland margin around the entire inlet and extending inland roughly 5 feet from the high tide line. Vegetation in Region 2 is typical of coastal salt marsh habitat.

Region 3 is within the bounds described for region 1. It consists of an area of old fill (probably dredge spoils) where there are many shells on the surface. The dominant plant in Region 3 is *Baccharis pilularis* (Coyote Bush) and *Carpobrotus edulis* (Hotentot fig) but also contains the federally listed (FE) *Suaeda californica* (California seablite). The presence of *Suaeda californica* and additional brackish tolerant species such as *Atriplex triangularis* (annual saltbush) indicates that at least part of the area regularly receives both fresh water (possibly springs and/or upland seepage) and salt water from the bay.

Region 4 is a wetland area dominated by *Triglochin concinna* (arrow weed) and contains the Federally listed *Cordylanthus maritimus* (salt marsh birds beak).

Region 5 is that portion of the property below the high tide line that is typically under water for significant periods of time and is characterized by submerged aquatic plants.

Figure 2 illustrates the location of these regions.

Table 3.0 SPECIAL STATUS SPECIES THAT MAY OCCUR IN THE VICINITY OF CUESTA INLET

COMMON NAME	SPECIES NAME	STATUS
Plants		
Birds beak	*Cordylanthus maritimus*	SE, FE
Sea blite	*Suaeda californica*	FE
Invertebrates		
Brackishwater snail	*Tyronia imitator*	SC
Morro Shoulderband snail	*Helminthoglypta walkeriana*	FE
Fish		
Tidewater Goby	*Eucogibus newberryi*	FE
Amphibians		
California Red-legged frog	*Rana aurora draytonii*	FT
Reptiles		
Black Legless Lizard	*Anniella pulchra nigra*	FE
Silvery Legless Lizard	*Anniella pulchra pulchra*	SSC
Southwestern pond turtle	*Clemmys marmorata pallida*	SC
Birds		
Cooper's hawk	*Accipiter cooperii*	SSC
California Black Rail	*Lateralis jamaicensis coturniculus*	ST
California Clapper Rail	*Rallus longirostris obsoletus*	SE, FE
Western Snowy Plover	*Charadrius alexandrinus nivosus*	FT
Western Yellow-billed Cuckoo	*Coccyzus americanus occidentalis*	SE, ST
Yellow Warbler	*Dendroica petechia*	SSC
Yellow-breasted chat	*Icteria viren*	SSC
Mammals		
Morro Bay kangaroo rat	*Dipodomys heermanni morroensis*	SE, FE

SE = State-listed Endangered
ST = State-listed Threatened
SCE = State candidate (Endangered)
SCT = State candidate (Threatened)
SSC = State Species of special concern
FE = Federally listed Endangered
FT = Federally listed Threatened
FPE = Federally proposed (Endangered)
FPT = Federally proposed (Threatened)
SC = Federal Species of concern

Table 3.1 Plant Species Observed, Cuesta Inlet.

*** indicates a listed Rare and endangered plant species.
Region 1 = Weedy highland area, from near houses & roads to within 5 feet of inlet.
Region 2 = Area within 5 feet of the inlet.
Region 3 = Old fill area where there are many shells on the surface.
Region 4 = Area dominated by *Triglochin* and where *Cordylanthus* has been reported.
Region 5 - Area at bottom of the inlet; submerged aquatic plants.

Scientific Name	Common Name	Family	Region 1	2	3	4	5	
Ambrosia chamisonis	beach bur	Asteraceae		x				
Ammophilla arenaria	beach grass	Poaceae	x					1 large colony N. of inlet.
Anagalus arvensis	scarlet pimpernel	Primulaceae	x					
Artemisia californica	California sage brush	Asteraceae	x					
Atriplex leucophylla	beach salt bush	Chenopodiaceae		x	x			couple individuals
Atriplex triangularis	annual saltbush	Chenopodiaceae			x			
Avena barbata	slender wild oat	Poaceae	x		x			
Avena fatua	common wild oat	Poaceae	x					
Baccharis douglasii	seep weed	Asteraceae		x				
Baccharis pilularis	coyote bush	Asteraceae	D		D			Locally dominant
Brassica (perennial)	mustard	Brassicaceae	x					
Briza maxima	greater rattlesnake grass	Poaceae		x				1 small group
Bromus carinatus	California brome	Poaceae	x					very common esp. neqr roads
Bromus diandrus	rip-gut brome	Poaceae	x	x				very common
Bromus hordaceus	soft chess	Poaceae	x					
Cakile maritima	sea rocket	Brassicaceae		x				
Camissonia cheiranthifolia	Beach evening primrose	Onagraceae			x			
Camissonia sp.	sun cups	Onagraceae		x				
Cardionema ramissima	san mat	Caryophyllaceae	x					
Carex praegracilis	turf sedge	Cyperaceae	x					
Carpobrotus edulis	Hotentot fig	Aizoaceae	D		D			Locally Dominant
Chamomilla suavelens	Pineapple weed	Asteraceae	x					
Conium maculatum	poison hemlock	Apiaceae	x					few individuals
Connicossia elonatum	narrow leaf ice plant	Aizoaceae	x					1few localized individuals.
Cordylanthus maritimus ***	birds beak	Scrophulariaceae				x		Scattered Individuals
Cortaderia selloana	pampus grass	Poaceae	x	x				Locally Dominant
Cotula coronofolia	brass buttons	Asteraceae	x	x	x			widespread
Cuscuta salina	salt marsh dodder	Convolvulaceae		x	x			
Distichlis spicata	salt grass	Poaceae	x	x	x	x		
Ehrharta calycina	veldt grass	Poaceae	x	x				
Ericimeria ericoides	mock heather (1 plt)	Asteraceae	x					
Erigeron canadensis	horseweed	Asteraceae		x				
Erodium cuscutarium	cut-leaf fileree	Geraniaceae	x					
Erodium moshatum	fileree	Geraniaceae	x					
Eshscholzia californica	California poppy	Papaveraceae	x					
Foenciculum vulgare	fennel	Apiaceae	x					1 plant
Frankenis salina	frankenis	Frankeniaceae			x			
Geranium dissectum	cut-leaf geranium	Geraniaceae	x					
Heteromeles arbutifolia	Toyon (1 plant)	Rosaceae	x					
Heterotheca grandiflora	telegraph weed	Asteraceae	x		x			
Hordeum murinum	fox tail barley	Poaceae	x					
Hypochaeris glabrata	smooth cat's ear	Asteraceae	x					
Jaumea carnosa	jaumea	Asteraceae		x	x	x		
Juncus acutus	pike rush	Juncaceae	x					

Table 3.1 (Continued)

Juncus bufonius.	toad rush	Juncaceae	x		x			
Juncus lesueurii	turf rush	Juncaceae			x			
Lavatera assurgentifolia	island mallow	Malvaceae					x	
Lavatera sp.	mallow	Malvaceae	x					
Lessingia filangifolia	coastal aster	Asteraceae		x				
Limonium californicum	sea status	Primulaceae		x	x	x		
Lotus scoparius	shrubby deerweed	Fabaceae	x	x				
Lotus sp.	annual deerweed	Fabaceae		x				
Lupinus arboreus	tree lupine	Fabaceae	x		x			
Lupinus bicolor	minature lupine	Fabaceae		x				
Lupinus chamissonis	beash shrub lupine	Fabaceae	x		x			Few plants, esp. N of inlet.
Medicago polymorpha	bur clover	Fabaceae	x	x				
Mimulus aurantiacus	bush monkey flower	Schrophulariaceae	x					1 plant
Picris echinioides	prickly ox-tongue	Asteraceae	x					
Plantago lanceolata	narrow leaf plantain	Plantanaceae	x					
Poa annua	annual blue grass	Poaceae	x					
Polygonum aviculare	knot weed	Polygonaceae	x					in roads primarily
Polypogon monspeliensis	rabbit-foot grass	Poaceae	x		x			common
Quercus agrifolia	coast live oak	Fagaceae	x					3 smallplants
Raphanus sativa	wild radish	Brassicaceae	x	x				
Rubus ursinua	blackberry	Rosaceae	x					
Rumex acetosa	red sorrel	Polygonaceae		x				
Rumex crispus	curly dock	Polygonaceae			x			
Ruppia maritima	ditch grass	Potamogetonaceae					x	
Salicornia virginica	pickle weed	Chenopodiaceae		x	x	x		
Scirpus americanus	3-square	Cyperaceae	x					
Scirpus pungens	common 3-square	Cyperaceae	x					
Silene gallica	windmill pink	Caryophyllaceae	x					a few individuals N of inlet.
Sonchus oleracea	sow thistle	Asteraceae	x	x				
Spergula arvensis	spurry	Caryophyllaceae	x					
Spergula macrotheca	sand spurry	Caryophyllaceae		x	x			
Spergularia marina	maritime sand spurry	Caryophyllaceae	x	x	x	x		
Suaeda californica ***	sea blite	Chenopodiaceae			x			Isolated individual scatered about inlet.
Triglochin concinna	arrow weed	Lilaeaceae			x	x		locally dominant in salt marsh portion
Vicia americana	common vetch	Fabaceae	x					
Vulpia myosorus	mouse tail fescue	Poaceae	x		x			
Vulpia sp.	annual fescue	Poaceae	x					

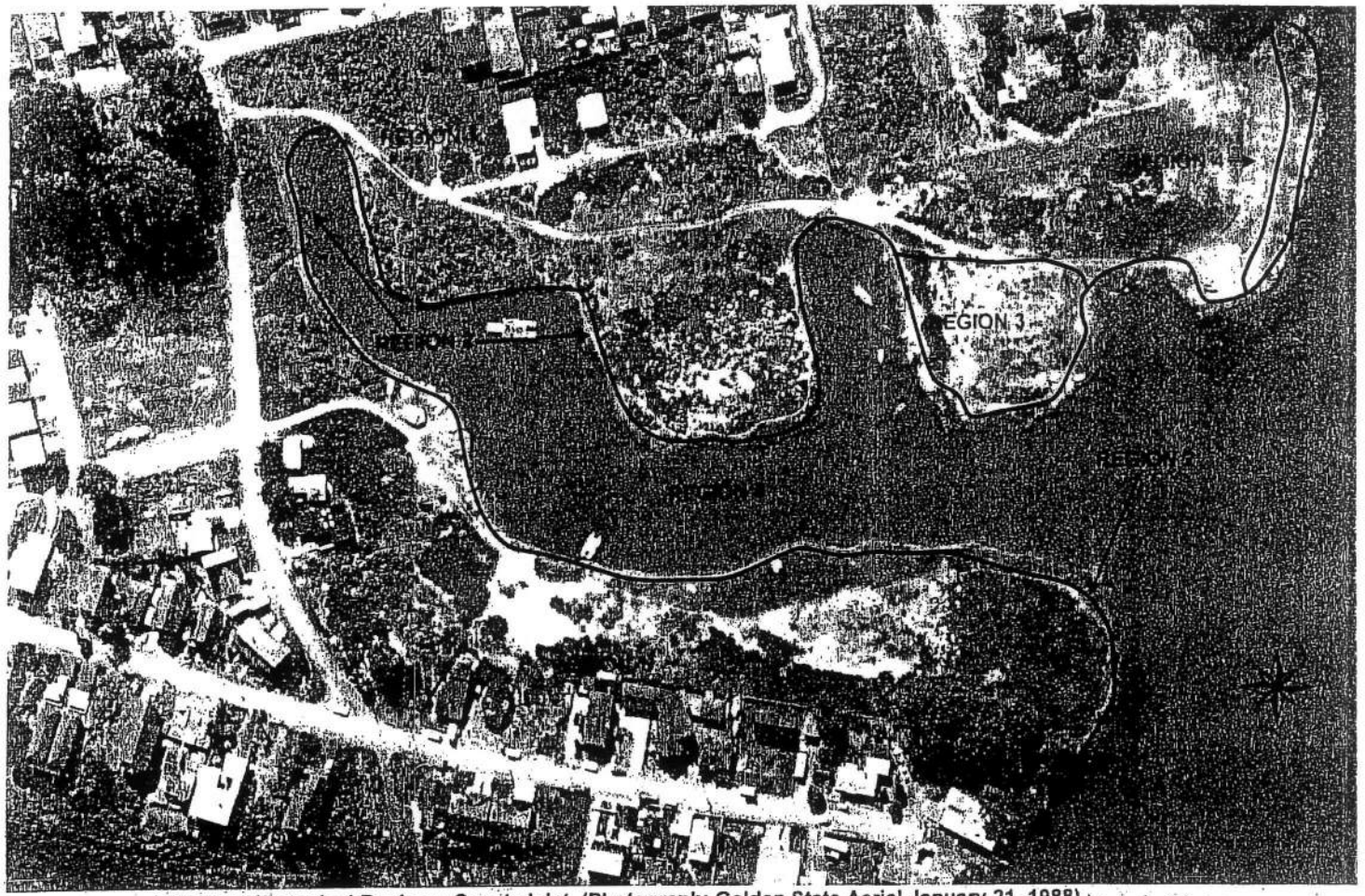


Figure 2. Botanical Regions, Cuesta Inlet. (Photograph: Golden State Aerial January 21, 1988)

Region 1 = Area from adjoining houses and roads to 5 feet from inlet.
Region 2 = Area within 5 feet of inlet (inland extent of marine vegetation).
Region 3 = Old fill area.
Region 4 = Area dominated by *Triglochin* & *Cordylanthus*.
Region 5 = Area at bottom of inlet (Submerged aquatics).

3.2 Zoological Features

The scope of this study is to identify the potential for species of concern to occur on site. Reconnaissance level inspection of the property was conducted to achieve that goal, however no systematic wildlife survey was performed for this study. Field observations and existing information about wildlife resources of the Morro Bay area form the basis of the following evaluation. A list of special status animal species identifying the general potential (high, moderate, or low) for each to occur at the Cuesta Inlet site is provided in Table 3.2. A discussion of those species with moderate to high potential to be found on-site is presented in the discussion below.

Morro shoulderband snail (*Helminthoglypta walkeriana*): The U.S. Fish and Wildlife Service (USFWS) listed the Morro shoulderband snail as endangered (FE) on December 15, 1994. The scope of FWS conservation efforts for this species can be found in the USFWS September 1997 *Draft Recovery Plan for the Morro Shoulderband Snail and Four Plants from Western San Luis Obispo County, California.*

This species occurs in coastal dune and sage scrub communities. The dominant plant species associated with the snail's habitat is mock heather (*Ericameria ericoides*). Other prominent associated species are buckwheat (*Eriogonum parvifolium*), dudleya (*Dudleya* sp.), and in more inland locations, California sagebrush (*Artemisia californica*) and black sage (*Salvia mellifera*) (Roth 1985). The Morro shoulderband snail has also been recently found associated with the non-native iceplant, *Carpobrotus edulis* (Symonds, Pers Comm, 1998; USFWS 1997). Development projects proposed in areas known to contain suitable habitat should anticipate the need to develop a habitat conservation plan (HCP) and acquisition of an incidental take permit (USFWS and MFS, 1996).

Habitat at the Cuesta Inlet property presents a high potential for occurrence of Morro shoulderband snail. Presence was confirmed by Kate Symonds, USFWS during an informal consultation on-site April 2, 1998.

Black Legless Lizard (*Anniella pulchra nigra*) and Silvery Legless Lizard (*A.p. pulchra*): The black legless lizard is listed as federally endangered (FE 2/4/94, NDDB). However, the listing package includes only those populations between the Salinas River and the Carmel River in Monterey County. Black Legless Lizard in the Morro Bay is not covered under this listing (Symonds, pers. comm. 1998). Silvery legless lizard is a state species of special concern.

Both species are associated with moist substrates and are primarily found in sandy soils with an abundance of leaf litter. These conditions occur at the Cuesta Inlet site and attempts to locate either of these subspecies were made during site visits. The potential for legless lizard to inhabit this property is moderate, however, none were observed during this study.

Coopers Hawk (*Accipiter cooperi*): A state species of special concern, Coopers Hawk nest primarily in dense oak woodland with a closed canopy and relatively open understory (Asay 1987).

Adequate habitat for breeding and nesting is absent, therefore potential for Cooper's Hawk to use the Cuesta Inlet site for these purposes is low. A moderate potential exists for this species to utilize the inlet property for feeding, however none were observed during this study.

Western Snowy Plover (Charadrius alexandrinus nivocus): A Federally listed Threatened (FT) species, Snowy Plover are one of the few shore birds that nest in California (State of California, 1987). Tidal action, proximity to domestic dogs and cats, and frequent human usage of the Cuesta Inlet preclude adequate nesting sites. However, Snowy Plover are known to nest at the Morro sand spit and the sandy beach areas and adjoining mud flats present possible forage possibilities.

The potential is low that Snowy Plover utilize this site for nesting is low. A moderate potential exists that the beach areas and adjoining tidal flats are used as feeding sites. This species was not observed on-site during this study.

Yellow Warbler (*Dendroica petechia*): A state species of special concern (SSC), the yellow warbler usually breeds in riparian woodlands with a well-developed understory and is common in suburban shrubbery.

The probability that yellow warbler nest on the Cuesta Inlet property is low and none were observed during this study. Adjacent residential and undeveloped properties may offer more acceptable nesting habitat therefore raising the probability that yellow warbler might utilize this site for cover or forage purposes.

Morro Bay kangaroo rat (Dipodomys heermanni morroensis): Morro Bay Kangaroo rat is a federal and state listed endangered species (FE, SE). The *Morro Bay Kangaroo Rat Recovery Plan* (USFWS 1982) identifies sandy soil and coastal sage scrub as factors of importance in defining appropriate habitat for this species. Sandy soil is essential for the construction of burrows and coastal sage scrub in an early seral stage of succession (shrubs less than 3 feet in height) provides the best kangaroo rat habitat (USFWS, 1982).

The coastal dune scrub at Cuesta Inlet exceeds 3 feet in height and the proximity of adjoining houses suggest that the probability is low that Morro Bay kangaroo rat currently occupy this site. Further, Cuesta Inlet is not identified as known occupied habitat in the *Morro Bay Kangaroo Rat Recovery Plan* (USFWS 1982).

MMON NAME	SPECIES NAME	STATUS	PROBABILITY OF OCCURRENCE	NOTES
Invertebrates				
Brackishwater snail	*Tyronia imitator*	SC	Low	Marginal habitat on-site
Morro Shoulderband snail	*Helminthoglypta walkeriana*	FE	High	Observed on-site
Fish				
Tidewater Goby	*Euclogibus newberryi*	FE	Low	Associated habitat absent
Amphibians				
California Red-legged frog	*Rana aurora draytonii*	FT	Low	Associated habitat absent
Reptiles				
Black Legless Lizard	*Anniella pulchra nigra*	FE	Moderate	Associated habitat present
Silvery Legless Lizard	*Anniella pulchra pulchra*	SSC	Moderate	Associated habitat present
Southwestern pond turtle	*Clemmys marmorata pallida*	SC	Low	Associated habitat absent
Birds				
Cooper's hawk	*Accipiter cooperii*	SSC	Low	Nesting habitat absent
California Black Rail	*Lateralis jamaicensis coturniculus*	ST	Low	Preferred habitat absent
California Clapper Rail	*Rallus longirostris obsoletus*	SE, FE	Low	Preferred habitat absent
Western Snowy Plover	*Charadrius alexandrinus nivosus*	FT	Low	May forage at beach area
Western Yellow-billed Cuckoo	*Coccyzus americanus occidentalis*	SE, ST	Low	Associated habitat absent
Yellow Warbler	*Dendroica petechia*	SSC	Low	Associated habitat adjacent
Yellow-breasted chat	*Icteria viren*	SSC	Low	Preferred habitat absent
Mammals				
Morro Bay kangaroo rat	*Dipodomys heermanni morroensis*	SE, FE	Low	Outside known range

= State-listed Endangered
= State-listed Threatened
E = State candidate (Endangered)
T = State candidate (Threatened)

FE = Federally listed Endangered
FT = Federally listed Threatened
FPE = Federally proposed (Endangered)
FPT = Federally proposed (Threatened)

SSC = State Species of special concern
SC = Federal Species of Concern: Species for which information may warrant listing, but substantial information to support a proposed listing is lacking.

3.3 WETLAND FEATURES

Cylinder (1995) identifies 3 basic criteria as essential in classifying wetlands:

- The presence of hydrophytes (water plants).
- The presence of hydric soils (saturated).
- The hydrology supports a wetland.

SLO County Coastal Zone Land Use Ordinance (CZLUO) Title 23 defines wetlands as "lands that may be covered periodically or permanently by shallow water, including saltwater marshes, freshwater marshes, swamps, mud flats and fens" (California Public Resources Code Section 30121). The current County Coastal Plan Policy document (1992) further defines the upland limit of wetlands by vegetation, soils, and hydrology (especially in disturbed sites) as:

> the boundary between land with predominantly hydrophytic cover and land with predominantly mesophytic cover; 2) the boundary between soil that is predominantly hydric and soil that is predominantly non-hydric; or 3) in the case of wetlands without vegetation or soil, the boundary between land that is flooded or saturated at some time each year and land that is not.

The definition adopted by SLO County, which is consistent with the California Department of Fish and Game definition, requires that only one of the three basic parameters need be present for an area to be considered a wetland. The focus of this study is the biologic resources of the Cuesta Inlet and observations of wetland plants (hydrophytes) is the criteria for identification of wetland areas illustrated in Figure 3.

Wetland areas contained on-site consist of Region 2, 4, and 5 as previously identified in Figure 2. In addition, a small fresh water drainage running from Nancy to the bay on the south side of the inlet, and one leading under Doris from the adjacent marsh area on the east side of the property contain associated hydrophytic vegetation.

4.0 ASSESSMENT AND RECOMMENDATIONS

Cuesta Inlet is located within the County of San Luis Obispo Estero Planning Area and is currently designated as an Environmentally Sensitive Habitat (ESH). The wetland habitat areas and protected species identified on-site present major constraints to potential development of this property.

Wetlands are defined in the SLO County Coastal Zone Land Use Ordinance (CZLUO) Title 23 as "lands that may be covered periodically or permanently by shallow water, including saltwater marshes, freshwater marshes, swamps, mud flats and fens" (California Public Resources Code Section 30121). The map provided in Figure 2 identifies the inland extent of the marine vegetation and those portions of the Cuesta

Inlet site that support hydrophytic vegetation. These areas would require additional review by the California Department of Fish and Game prior to development.

Figure 3 illustrates those areas of the property most likely to present High and Low constraints to possible development resulting from extant biological resources. Biological constraints at this location are dictated by guidelines established by the Endangered Species Act (USFWS), Section 404 of the Clean Water Act and Section 10 of the Rivers and Harbors Act (US Army Corps of Engineers), the California Endangered Species Act (California Department of Fish and Game), and the Local Coastal Plan (County of San Luis Obispo).

As indicated in Figure 3, San Luis Obispo County ordinance has established minimum setbacks at Cuesta Inlet for wetland protection. On the north side of the inlet, development would not be allowed within 50 feet of the inland extent of the marine vegetation. On the south side of the inlet a minimum setback of 75 feet from the inland extent of the marine vegetation is required. Designation of high constraint is indicated in those areas where potential direct or indirect impacts from development could be significant and mitigation would likely not result in reducing impacts to less than significant levels. Those portions of the property that are free of species or habitat that are not protected or are degraded and do not support listed, candidate, or species of special concern are identified as low constraint. Areas of medium constraint have not been identified as no project has been presented at the time of this study. The difference between a high constraint and a medium would be the feasibility of mitigation. The greatest protection to species listed as threatened or endangered is to pursue development options that avoid those sensitive resources. Should project options be chosen that result in the possible loss of individuals or the supporting habitat, mitigation must be presented in a Habitat Conservation Plan (section 10 of the federal Endangered Species Act). When final development plans are produced, those portions of the property where small amounts of resource loss could be demonstrated to be mitigated on-site, or similar habitat could be purchased off-site, assignment of a medium constraint might be accommodated. However, replacement of habitat for *Cordylanthus*, and *Suaeda* would be difficult or impossible to find or create. Therefore any development plans for this property should focus on locations in the areas designated as presenting low constraints, Figure 3.

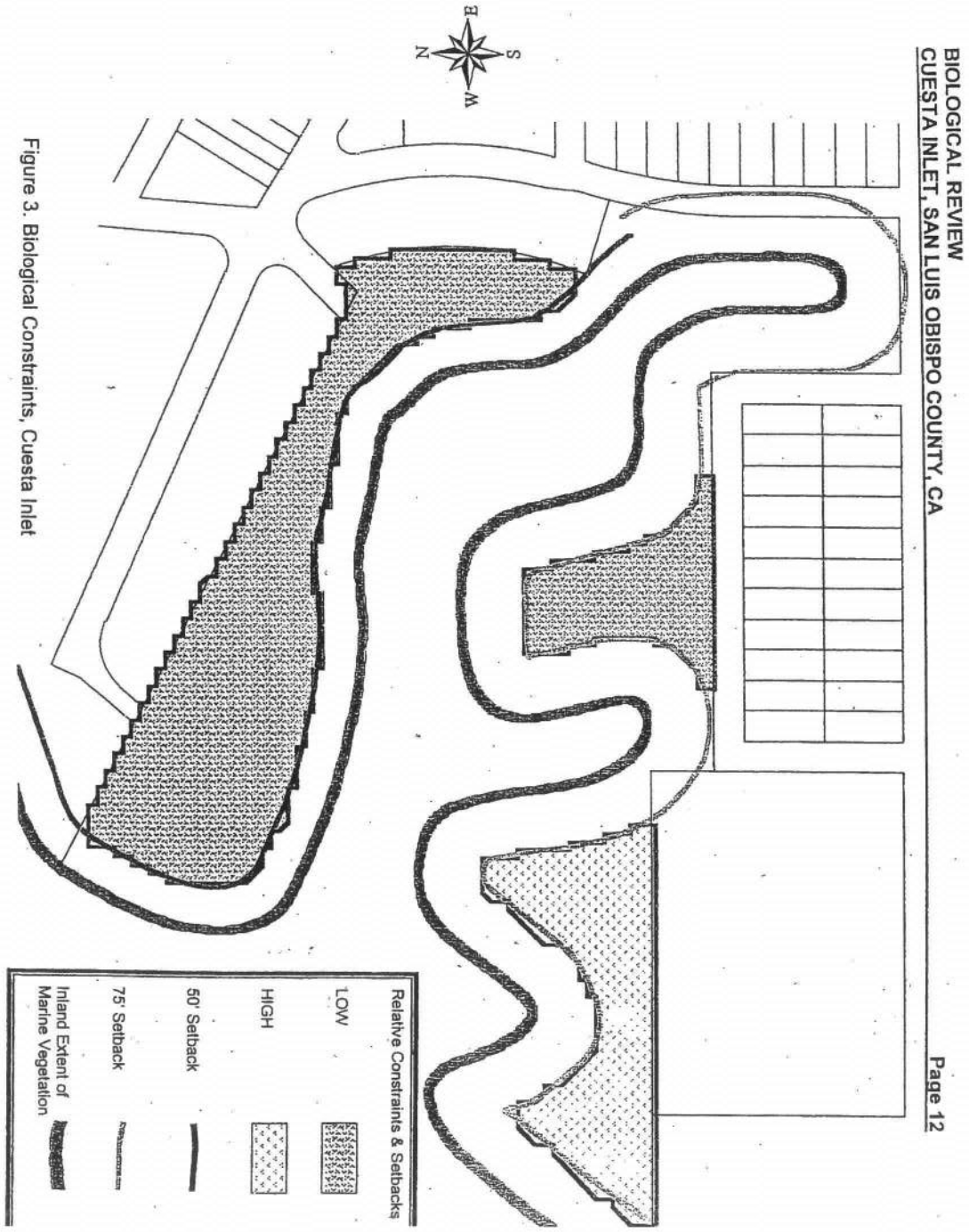


Figure 3. Biological Constraints, Cuesta Inlet

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SAN LUIS OBISPO COUNTY
DEPARTMENT OF PLANNING AND BUILDING

VICTOR HOLANDA, AICP
DIRECTOR

October 27, 2003

Teresa McClish
364 Main Street
Morro Bay, CA 93442

Dear Ms. McClish:

SUBJECT: ESTERO AREA PLAN UPDATE: CUESTA INLET

Thank you for your comments on the Estero Area Plan Update regarding the parcels that comprise the Cuesta Inlet. Your comments will be forwarded to the Planning Commission for its consideration during the public hearings on the area plan update that are tentatively scheduled to begin on December 11, 2003.

The Public Hearing Draft Estero Area Plan includes planning area standards for the Cuesta Inlet that limit the maximum density to one parcel and dwelling unit per five acres, with development to be clustered or concentrated as specified in the areawide planning area standards (see standards A1 through A4 on page 7-142 of the draft plan). However, the Draft Environmental Impact Report for the Estero Area Plan recommends a mitigation measure that would eliminate proposed density increases in areas such as the Cuesta Inlet that contain endangered species habitat (mitigation measure BR-11 on page 5.8-34). Accordingly, staff may recommend to the Planning Commission that the maximum density on the Cuesta Inlet properties remain at one dwelling unit, as specified in the existing Estero Area Plan. We will, however, first forward the biological review included in your letter to our EIR consultants to be used in determining whether mitigation measure BR-11 should be revised.

Please contact me if you have any questions or would like additional information. You may also reach me by phone at 781-5608 or by E-mail at mwulkan@co.slo.ca.us.

Sincerely,

Mike Wulkan

MIKE WULKAN
Senior Planner

COUNTY GOVERNMENT CENTER • SAN LUIS OBISPO • CALIFORNIA 93408 • (805) 781-5600

Letter 5
Teresa McClish, Cuesta Inlet Property Owners

October 24, 2003

5-1 The commenter states that a proposal for increased density on the Cuesta Inlet properties has been previously discussed with County Staff and recommended by Los Osos Community Advisory Council (LOCAC) and supports its implementation.

Response: Comment noted.

5-2 The commenter notes that Mitigation Measure BR-11 included in the draft plan in section 5.8.3.3 recommends against this type of density increase.

Response: The commenter is correct that the draft plan recommends Mitigation Measure BR-11 on page 5.8-34 that would eliminate proposed density increases in areas such as Cuesta Inlet that contain endangered species habitat. In accordance with the recommendation staff may recommend to the Planning Commission that the maximum density on the Cuesta Inlet properties remain at one dwelling unit, as specified in the existing Estero Area Plan.

5-3 The commenter suggests that a project-specific EIR be made allowable for the Cuesta Inlet properties in order to determine the appropriate density.

Response: The Area Plan does not preclude the processing of a general plan amendment to allow increased density on the site. However, the proposed lower density is considered appropriate for the site. The staff and consultants have reviewed the report, along with a letter from John Chesnut, a local biologist, regarding sensitive species in this area (attached). Both reports conclude that mitigation of impacts to *Cordylanthus* species would be difficult in the planning area. Mr. Chesnut further finds that populations of *Cordylanthus* "occupy a significantly larger portion of the site than as delineated in the July 1998 report." The FEIR correctly recommends mitigation limiting development in this area.

Letter 6

STATE OF CALIFORNIA – THE RESOURCES AGENCY
ARNOLD SCHWARZENEGGER, Governor

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CENTRAL COAST DISTRICT OFFICE
725 FRONT STREET, SUITE 300
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November 24, 2003

Nancy Orton
San Luis Obipso County Department of Planning and Building
County Government Center
San Luis Obispo, CA 93408

Subject: **Draft Environmental Impact Report for the Estero Area Plan Update**

Dear Ms. Orton:

Thank you for providing Coastal Commission staff with the opportunity to comment on the Draft Environmental Impact Report (DEIR) that has been prepared for the Estero Area Plan Update. As you know, the Commission staff has been working closely with the County to address the Coastal Act issues associated with this amendment to the County's Local Coastal Program (LCP). Although staffing constraints have prevented the Commission staff from completing a detailed review of this document, I hope that our input during the preparation of the Update, summarized below, has provided adequate direction to allow for an effective environmental analysis of the coastal resource issues associated with the Update.

1. Commission Staff Comments Submitted in February 2000

6-1

The comments provided by the Commission staff on the 1999 version of the Update and associated DEIR detail the coastal resource and public access issues that need to be addressed in order to comply with Coastal Act requirements. Since that time, the Commission and County staff participated in numerous meetings focused on resolving these issues, and significant adjustments to the previously proposed update have been made. On April 25, 2003, we met to discuss the Commission staff's preliminary comments on the 2003 Public Review Draft of the re-released Update, and follow-up conference calls were conducted on May 9, 2003, June 5, 2003, and August 8, 2003. In recognition of these efforts, Commission staff requests that the EIR explain how the Update responds to the issues submitted by the Commission staff in the comments dated February 25, 2000 (copy enclosed).

2. Periodic Review of San Luis Obispo County Local Coastal Program

6-2

Both the County and the Commission have recognized the Estero Area Plan Update as a critical tool for implementing the recommendations of the Periodic Review, adopted by the Commission in July 2001. As reflected in the September 29, 2003 letter from the Commission to the County regarding Periodic Review implementation, the Estero Update should implement Periodic Review recommendations including but not limited to 2.16 – 2.20, 4.6, 4.36 – 4.47, 6.1, 7.8, 8.1, 8.2, and 8.6. Accordingly, the Commission staff requests that the EIR identify the way in which the Update will implement these recommendations.

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6-3

3. Los Osos Habitat Conservation Planning

The on-going effort to develop a Habitat Conservation Plan (HCP) for the Los Osos area has similarly provided an opportunity for close coordination between the County and Commission on the biological resources issues associated with the Estero Area Update. Through our participation in the HCP working group and other planning efforts described above, the Commission staff has emphasized the importance of coordinating the HCP with the Estero Area Plan update. To the degree that the Update will be relying upon the HCP as a means to protect environmentally sensitive habitat areas (ESHA) in Los Osos, the Update and the EIR must identify specific development standards, and provide detailed biological data and analyses, to establish that HCP implementation will protect ESHA consistent with Coastal Act requirements.

Thank you for your attention to these comments. Please feel free to contact me if you have questions or would like to discuss these matters further.

Sincerely,

Steve Monowitz
Coastal Planner

Enclosures: February 25, 2000 CCC Comments on the 1999 Estero Plan Update Public Hearing Draft and Draft EIR.

Letter 6
Steve Monowitz, Coastal Planner
California Coastal Commission

November 24, 2003

6-1 The commenter requests that the County respond to issues raised in the February Letter 6 astal Commission letter submitted on the previous draft EIR.

Response: The commenter is referred to the following Letter 7, and the table(s) of responses attached.

6-2 The commenter requests that the County respond to issues raised in the Periodic Review recommendations outlined in a September 29, 2003 letter.

Response: The commenter is referred to the following Letter 8, and the responses attached.

6-3 The commenter states that the Update and the EIR must identify specific development standards, and provide detailed biological data and analyses, to establish that HCP implementation will protect ESHA consistent with Coastal Act requirements.

Response: The commenter conditions his request for analysis "to the extent the Update will be relying on the HCP to protect ESHA." The proposed Area Plan contains a number of policies and programs aimed at the protection of ESHA in the planning area separate from the preparation of an HCP, as listed under the Los Osos Dune Sands SRA, the Los Osos Greenbelt, Los Osos Habitat Conservation, and general community development standards. The proposed policies and standards are designed to be complementary to the HCP and the provisions of the Endangered Species Act. The HCP is therefore a component of, but not the only option for, habitat protection in the Los Osos area. Specific development standards are provided throughout the plan that aim for habitat protection and ESHA protection in the Los Osos area. These specific development standards, including allowable building areas, setbacks, etc. will provide the foundation for the HCP.

The County is currently cooperating with a number of agencies, as expressed on page 6-19, in the preparation of an HCP for the Los Osos CSD's Sewer Project. As noted in the Area Plan, the Sewer Project is the sole impetus for the preparation of a communitywide HCP for Los Osos. The current practice is the preparation of individual HCPs for specific projects as they are proposed. If the communitywide HCP does not come to fruition, two scenarios will exist: (1) some minor development may continue but would be required to proceed under the individual consultation process (not to mention being subject to all of the restrictions regarding services in the Area Plan); and (2) the CSD will not be able to provide new hookups, effectively limiting development.

The EIR provides a general assessment of habitat, and sensitive plant and animal species in the Los Osos Area in Section 5.8, at a level of specificity commensurate with the level of specificity of the Area Plan. The detailed mitigation ratios and development standards which will develop as part of the HCP have yet to be determined, and will not be final until the HCP receives final approval from the Fish and Wildlife Service. The HCP is being designed with ESHA protection in mind, pursuant to input from the Coastal Commission team members, and guidance from the Estero Area Plan.

As described above, the plan has been designed to support the HCP, and to protect ESHA. Conclusions of significant and unavoidable impacts in the FEIR reflect the valuable nature of the area, and the high likelihood of impacts to sensitive species and habitat. No additional mitigation is proposed by the FEIR, reflecting the relatively complete nature of the Area Plan in addressing ESHA issues.

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Letter 7

STATE OF CALIFORNIA - THE RESOURCES AGENCY
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CENTRAL COAST DISTRICT OFFICE
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GRAY DAVIS, Governor

February 25, 2000

Nancy Rollman and Mike Wulkan
San Luis Obispo County Department of Planning and Building
County Government Center
San Luis Obispo, CA 93408

Subject: ***Coastal Commission Staff Comments on the Estero Plan Update Public Hearing Draft and associated Draft Environmental Impact Report***

Dear Ms Rollman and Mr. Wulkan:

Thank you for the opportunity to comment on the Public Hearing Draft of the Estero Area Plan Update (Update) and accompanying Draft Environmental Impact Report (DEIR). We apologize for not being able to submit our comments by the DEIR's February 8, 2000 receipt date. As you know, the Commission plays an important role in the review and certification of the proposed Update. We therefore greatly appreciate your consideration of, and attention to, these comments.

The Commission staff recognizes the tremendous long-term effort of County staff and participating citizens in the development of this update, and looks forward to working with all of the interested parties in finalizing the updated plan. Towards this end, our comments are intended to ensure that the policies of the Coastal Act, with which the Update must comply, are effectively addressed during the local review process. To the degree that these issues can be resolved prior to the submission of the final Update for Coastal Commission certification, the amount of time, and potential controversy, associated with the Commission's review can be minimized.

Our comments have been formatted in a manner that presents our overall perspective on the Update, including our most significant concerns and observations, in the General Comments section below. These are followed by Text Specific Comments regarding the Update, the DEIR, and the Requested Amendments documents. Please note that these comments are based on our preliminary and initial review of these documents. We hope that we can maintain an open dialogue with County staff and other interested parties throughout the local review, to ensure that these, and any other Coastal Act issues that may arise, are appropriately addressed.

Unfortunately, we have not had the opportunity to complete our review of the separate update chapter on Public Access, recently submitted to us. We greatly appreciate the County staff's willingness to accommodate our request that the Update include such a Chapter, as called for by Section 30500 of the Coastal Act. We will provide our comments on this Chapter as soon as possible, and prior to the Planning Commission hearing(s) on the update.

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I. Overall Comments

A. Biological Resources/Environmentally Sensitive Habitats

In general, the Update contains many beneficial additions and revisions to the Estero Area Plan as currently certified. This includes, but is not limited to, the inclusion of new information regarding the type and extent of sensitive habitats and other important coastal resources throughout the planning area, as well as the incorporation of new policies and programs to better protect and preserve such resources. For example, we agree and support the Update's designation of coastal strand, coastal scrub, maritime chaparral, and Monarch butterfly habitats as Sensitive Resource Areas, and the clarification that such areas do not necessarily need to be mapped by the LCP in order to require protection.

Nevertheless, we are extremely concerned that the cumulative extent of buildout allowed by the Update may not effectively protect these and other important coastal resources. While the Update provides new policies and programs to protect sensitive habitats, it also proposes to increase allowable densities of development in such habitat areas within Los Osos. As a result, the DEIR proposes, on page 5.8-36, that density increases within areas of Endangered Species Habitat should be eliminated from the update. It is unclear if and how this, and the other mitigation measures proposed by the DEIR, will be incorporated into the Update. The Final EIR should specifically identify the revised policies, programs, and standards that are needed to carry out the proposed mitigation measures.

7G-1

Even with the proposed mitigation measures, the DEIR states on page 5.8-36 that the impacts to sensitive habitats posed by the Update remain significant and unavoidable. We question the conclusion that such impacts are unavoidable, because it does not appear that an aggressive enough approach to avoiding and mitigating adverse impacts of new development on sensitive habitats has been pursued by the Update. Pursuant to Section 30240(a) of the Coastal Act, new development in environmentally sensitive habitats that is not dependent upon the resource should be avoided. If it is not possible for the Update to prohibit such new development in sensitive habitat areas, only the minimum amount of new development to avoid a "taking" of private property, based on legitimate economic-backed expectations, should be allowed. In general, this equates to one residence per lot of record. Such an approach is only applicable if there are adequate public services (e.g., water and sewer) available to accommodate such development (see part I.B of these comments), and the new development would not be a public nuisance. Any alternative approach to protecting sensitive habitat areas, such as the proposed TDC programs needs to be accompanied by evidence that such an approach will effectively prevent a significant disruption of sensitive habitats, and will be compatible with the biological continuance of such areas.

7G-2

7G-2a

7G-2b

In addition to the proposed voluntary TDC programs, the Update proposes to minimize the impacts of new development on sensitive habitats through off-site mitigation and mitigation banking. While creative measures such as these may deserve further consideration, we have many questions regarding the specific implementation of such programs (see text specific comments below), and whether they will effectively protect the biological productivity and diversity of the Estero area. Unfortunately, the DEIR has not specifically analyzed the overall

effectiveness of such programs, or provided mitigation measures that would achieve these objectives. Information that should be provided by subsequent versions of the Update and/or the Final EIR to address this issue includes:

- How will the number of credits granted to a TDC sending site be determined? 7-1L
- How will the increased density and intensity of development in the TDC receiving areas affect sensitive habitats in and around the receiving area? 7-2L
- Why not designate receiving areas in portions of the planning area that do not contain, or are not adjacent to, sensitive habitats? 7-2L
- Why is participation in the TDC programs a voluntary rather than mandatory requirement? 7-3L
- What will be the residual impacts to sensitive habitats within the TDC areas under complete or partial implementation of the programs? How does this relate to the cumulative impact of development on the biological productivity of the Estero area? 7-2L

For portions of the planning area that contain sensitive habitats but are not covered by the proposed TDC programs, such as vacant parcels within the central area of Los Osos, the Update and EIR should address:

- Which portions of the Urban Area contain areas of valuable habitat that should be preserved, and which areas do not provide habitat that is viable over the long term and should be available for development combined with off-site mitigation? Please provide specific biological data and information that provide a basis for such determinations. For those urban habitats that deserve long-term protection, the Update/EIR should provide specific standards that will be used to avoid adverse impacts to such areas. 7-1C 7-4L(a)
- Where impacts to sensitive habitats within the urban area will be addressed through off-site mitigation, what will be the minimum size, type, and duration of off-site mitigation required? What are the specific areas where such mitigation must be located? Are there adequate mitigation sites available to carry out this approach? How will the provision of of-site mitigation relate to the timing of new development? What will be the overall amount of habitat lost through this approach? How does this compare to the amount of habitat that could be lost in the proposed mitigation areas under existing land-use regulations? 7-4L(b)

This and other information necessary to analyze whether the TDC and off-site mitigation approach proposed by the Update will effectively protect special status species, their habitats, and the overall biological productivity of the effected area, should be included in the Final EIR.

Additional important information that needs to be provided by the Final EIR in order to allow for an assessment of the Update's conformance to Section 30240 of the Coastal Act are specific analyses of the proposed roadway extensions within or adjacent to environmentally sensitive habitats. Of particular concern is the proposed extension of 3rd street, which is expected to impact wetlands, and the proposed extension of South Bay Boulevard, which will involve the removal of, and impacts to, important coastal scrub and maritime chaparral habitats. 7-5L

B. New Development/Public Service Capacities

7G-3

Another area of significant concern is that the level of development allowed by the Update can not be supported with the region's existing water supplies and wastewater treatment capacities.

7G-3(a)

In the case of Los Osos, existing water withdrawals from the groundwater basin are estimated to exceed the safe-yield by close to 1,400 acre feet per year[1], and there is a prohibition against septic system discharges due to the adverse impacts such discharges pose on water quality and aquatic habitats. Yet the proposed Update will result increase the population buildout in Los Osos by 9,094 people (3,334 residential dwellings)[2]. In the case of Cayucos, there is only 154 acre feet per year available to serve new development, under the current occupancy rate of 64%. (According to Table 3-3 on page 3-17 of the Update, there would only be 12 acre-feet available to serve new development if existing development is occupied 100% of the time.) The proposed update will increase the buildout of Cayucos by 2,352 people ((621 residential dwellings)[3]. This will exceed the existing allocation of 600 acre feet per year from Whale Rock Reservoir by 181 acre feet per year[4].

In response to the water and wastewater treatment constraints in Los Osos, the Update relies upon the Regional Water Quality Control Board's prohibition of septic system discharges to preclude new development from occurring until a wastewater treatment system is constructed. This system is, in turn, being relied upon for drinking water supply, along with the potential allocation and delivery of 600 acre feet per year from Lake Nacimiento. In the case of Cayucos, the water needed to support buildout is dependent upon potential allocation and delivery of 124 acre-feet of water from Lake Nacimiento, and an assumption that new and existing development will not have a 100% occupancy rate.

There are many reasons why these assumptions will not be adequate to address the requirements of Coastal Act Section 30250[5], including, but not limited to:

7G-3(b)

- The RWQCB's prohibition against septic system discharges will not prevent new development that will place additional demand on water supplies in Los Osos. In addition to the fact that much of the development provided for by the update is outside of the prohibition area, there is the potential for exemptions to this prohibition, and alternative means of wastewater treatment that would allow development to move forward prior to a community wide treatment system.

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[1] DEIR, page 5.4-20, Table 5.4-10
[2] DEIR, page 3-31. Table 3-13
[3] DEIR, page 3-31. Table 3-13
[4] DEIR, page 5.4-19, Table 5.4-8, assuming an 89% occupancy rate of existing units and 95% of new units.
[5] Section 30250 states in part "(a) New residential, commercial, or industrial development, except as otherwise provided in this division, shall be located within, contiguous with, or in close proximity to, existing developed areas able to accommodate it or, where such areas are not able to accommodate it, in other areas with adequate public services and where it will not have significant adverse effects, either individually or cumulatively, on coastal resources. In addition, land divisions, other than leases for agricultural uses, outside existing developed areas shall be permitted only where 50 percent of the usable parcels in the area have been developed and the created parcels would be no smaller than the average size of surrounding parcels."

7G-3(c)

- The ability of a wastewater treatment system to recharge the groundwater basin with the quantity of water needed to supply buildout of the Update, at a rate equivalent to the rate at which increased withdrawals will be required by new development, has yet to be established. Even with the projection that a sewer system could increase the safe yield of the groundwater basin by 2,000 acre feet per year, demand under buildout is estimated to exceed the safe yield of the groundwater basin by 190 acre feet per year.

7G-3(d)

- Neither the DEIR nor the Update provide specific information regarding the process by which allocations from Lake Nacimiento can be secured, analyze the feasibility for this to occur, or evaluate the dependability of such allocations in drought situations. Nor is there an analysis of the environmental impacts associated with pipeline construction. Even if this water becomes available, Cayucos would still have a shortfall of 57 acre feet per year under buildout[6].

7G-3(e)

- The potential for residential units to be occupied at higher rates needs to be accounted for by the Update. Overall trends regarding the changes in rates in occupancy over time should be provided by the EIR, and gauged to determine the likely ultimate demand for water under buildout.

Given the significant uncertainties surrounding future water supplies needed to support the level of development that would be accommodated under the Update, it's compliance with Section 30250 of the Coastal Act must be called into question. Substantial reductions in the potential buildout of the urban areas, proportional to the amount of water that is known to available on a sustainable basis, therefore appears to be necessary. All land divisions, or increases in allowable density, should be prohibited within the Los Osos groundwater basin and the Cayucos urban area until these issues are resolved.

7G-3(f)

7G-3(g)

It should also be made clear throughout the updated Area Plan that no new development will be permitted until evidence of an adequate and environmentally sustainable water supply and (in the case of Los Osos) wastewater treatment system is provided. Said evidence should be required at the time of coastal development permit application, and should ensure that adequate capacities have been reserved for Coastal Act priority uses.

7G-3(h)

With respect to wastewater treatment capacities in Los Osos, it is premature to assume that a future wastewater treatment system will be able to accommodate the increased buildout proposed by the Update. Until the ultimate capacity of such a system is known, and the ability of the system to abate existing ground and surface water quality degradation is established, it is inappropriate for the Update to allow for new development that will generate additional wastewater in Los Osos.

7G-3(i)

C. Other Coastal Act Issues

In addition to our significant concerns regarding the Update's impact on sensitive habitats and public service capacities, the following Coastal Act issue areas should be further considered

[6] DEIR, page 5.4-19, assuming 89 percent occupancy rate for existing units and 95% for new units (current occupancy rates are estimated to be 64%).

during the local review, and analyzed in more detail by the Final EIR. Please note that additional text-specific comments regarding these issue areas are provided in sections II a, b, and c of this letter

Conversion of Agricultural Land: Where agricultural lands are proposed to be converted to non-agricultural land use designations, and analysis of conformance with Coastal Act Sections 30241 through 30242 should be provided by the Final EIR.

7-2C
7-6L

Coastal Access and Recreation: While the Update contains many beneficial policies and programs to enhance coastal access and recreation opportunities, we are concerned about the addition of language regarding the specific legal concepts of "nexus" and "rough proportionality" that reflect current Constitutional Fifth Amendment takings clause jurisprudence. The incorporation of such language, based on particular judicial cases, is not necessary to ensure that the public's right of access to and along the shoreline is appropriately balanced with the rights of private property owners, as this is already provide for in existing policies. Moreover, such language may limit the provision of legal and appropriate public access and recreation facilities that may be warranted as judicial case law evolves and future legal interpretations might encourage. In addition, the lack of guidance regarding the application of these concepts may lead to a dismissal of access and recreation requirements that may be appropriate under the current interpretations of the Fifth Amendment.

7-3C
7-7L

Priority for Visitor-Serving Uses: Proposals to allow for mixed-uses in commercial areas need to be evaluated for overall impacts on visitor-serving opportunities and consistency with Section 30222 of the Coastal Act. This is particularly important in areas with a Visitor-Serving Combining Designation. At a minimum, a maximum number of residential units associated with mixed-use projects should be prescribed by the Update. This limit should ensure that residential uses in commercial areas will not inhibit the provision of adequate facilities necessary to serve coastal access and recreation, or jeopardize the area's ability to meet the demand for visitor-serving accommodations. All residential uses should be accompanied by documentation recognizing that commercial and visitor-serving uses have priority in the area.

7-4C

Protection of Visual Resources: While the Update provides new policies and programs that will help protect the scenic resources of the Estero area, we remained concerned that the development accommodated by the Update will significantly degrade the aesthetic qualities of visually prominent areas such as the southern hillsides of Los Osos. The Final EIR should include more thorough analyses of the visual impacts posed by new development in such visually significant areas, and should consider the impacts to views available from public beaches, Morro Bay, and the Pacific Ocean. Applying these analyses, the EIR should identify more detailed visual protection criteria that will avoid and minimize the impact of new development on visually sensitive areas. The Final EIR should also address the visual impacts of the proposed TDC programs.

7-8L

7G-4

Coastal Hazards/Seawalls & Fire Protection: The proposal to allow for new development that requires seawalls, where seawalls exist on both sides of the proposed development, runs contrary to the requirements of Coastal Act Section 30253(2). This proposal is also complicated by the fact that many seawalls within Cayucos may have been installed with out the proper permits.

Before such an approach can be considered, a more comprehensive analysis of the impacts of existing and additional seawalls on coastal access and recreation, and on natural shoreline processes, must be provided. This should include, among other things, a sub-regional approach to seawall development (including repair and maintenance of existing seawalls, and the resolution of unpermitted seawalls), that minimizes such impacts.

7G-4(a)

Another important issue relative to seawalls and bluff setbacks is the existing area plan's premise, retained by the Update, that new development should be setback to withstand 75 years of erosion. In investigating this issue, Commission staff has found that most structures last at least 75 years. We therefore suggest that setbacks adequate to withstand at least 100 years of erosion should be required by the update. Setback requirements should also include a buffer adequate to allow for construction measures necessary to abate the hazard when 100 years of erosion have been reached (i.e., remove or relocate the threatened structure). Where setback requirements have been developed to avoid the need for future seawall, approval of the development should be accompanied by a condition that specifically prohibits the construction of a seawall to protect the development.

7G-4(b)

In terms of Fire Protection, the Update should include specific standards regarding new development within areas that have significant fire risks. These standards should be designed so that the necessary setbacks are achieved without causing the removal of vegetation that supports sensitive habitats and/or provides scenic resources. In addition, the update should clarify the permit requirements and environmental review needed for any vegetation clearance proposed in order to protect existing development.

7-5C
7-9L

7G-5

Marine Resources/WaterQuality: While we support the intent of the Update to address water quality issues, we are concerned that the proposed policies and programs lack the specificity necessary to ensure effective implementation and protection of aquatic resources. Such policies and programs should provide detailed performance standards to carry out the objective of watershed protection, using the Coastal Commission's and State Water Resource Control Board's *Plan for Controlling Polluted Runoff* as guidance. These standards should include, but may not be limited to: requiring the use of specific types of Best Management Practices (e.g., oil/water separators, vegetated swales/filter strips, detention basins, etc.), particular to different types of land uses, soils, and topographies; establishing minimum capacity requirements, performance standards, and monitoring provisions for drainage facilities; and, maintaining natural drainage patterns, quantities, and velocities to the greatest extent feasible.

Archaeological Resources: The Final EIR should evaluate archaeological resource protection standards for conformance with Section 30244 of the Coastal Act[7] and, if necessary, provide revised language necessary to achieve consistency.

7-6C
7-10L

[7] Section 30244 states: "Where development would adversely impact archaeological or paleontological resources as identified by the State Historic Preservation Officer, reasonable mitigation measures shall be required."

II. Text Specific Comments

A. Draft Update Language

Page 1-14, Planning Policies: The proposed Update will significantly expand on the number of policies contained in the Area Plan, and add many new goals. Please clarify how these new policies and goals relate to the Framework for Planning. Are they on the same footing as the "Planning Area Standards" in terms of providing a standard of review for new development? Do they supersede Coastal Plan Policies and Coastal Zone Land Use Ordinances? 7-7C 7-11L

Page 1-15, Area Plan Maps: It should be clarified that the Combining Designation Maps should be used for guidance only, and that the presence of environmentally sensitive habitats on a site is dependent upon the on the ground resources rather than a designation on a map. 7-8C 7-12L

Page 2-9, Cayucos Goal 10: How will the proposal to "Concentrate most new major tourist-oriented commercial development on North Ocean Avenue, west of Cayucos Creek" affect the ability of the area to accommodate the demand for visitor-serving facilities that provide coastal access and recreation opportunities? Will concentrating these facilities in the proposed area have an adverse impact on scenic or other coastal resources that could otherwise be avoided by distributing such facilities throughout a greater area? 7-9C

Page 2-17, Jobs/Housing Balance: This discussion identifies the low ratio of jobs to housing in the communities of Cayucos and Los Osos. While the Update will slightly improve this situation, are there additional revisions to the Area Plan that would help achieve a better balance? 7-10C 7-13L

Page 2-29, suggested amendments to Growth Management Ordinance: While the proposed reductions in the Growth Rate may be a useful tool for protecting coastal resources, please explain how the proposed Growth Rate of 2.3% in Cayucos and Los Osos was arrived at? Are there adequate public service capacities to accommodate such growth (please see Section I.B of this letter). Please clarify the relationship of the Growth Management Ordinance to the LCP. 7-11C 7-14L

Pages 3-8 & 3-9, Figures 3-1 and 3-2: Please show the location of the Urban Service Line (USL) and Urban Reserve Line (URL) on these maps. 7-12C 7-15L

Page 3-12 & 3-13, Comparison of Water Supply and Demand: Neither the discussion on page 3-12, nor Table 3-2 adequately reflect the existing overdraft of the groundwater basin in Los Osos, or that the buildout of Los Osos and Cayucos will exceed available supplies. This important issue should be recognized by the Area Plan, and measures to reduce buildout to a level that can be sustained by available water supplies should be provided (see part I.B of this letter). 7-16L (a) 7-13C (a)

Page 3-17, Projected Water Supply and Demand: Please explain the process of obtaining Lake Nacimiento water, and describe the infrastructure improvements that would be necessary to deliver such water. The feasibility of acquiring additional allocations, and the environmental impacts of constructing the necessary infrastructure, should be analyzed by the Final EIR and taken into consideration during the local review of the Update. 7-16L (b) 7-13C (b)

Page 3-27, Los Osos Sewage Disposal: We recommend that the third paragraph describing the Coastal Commission's consideration of the County sewer project be updated as follows: 7-17L

> ~~In June 1999,~~ Upon appeal to the California Coastal Commission, ~~is scheduled to decide whether or not to approve~~ the county-designed sewer project has been held in abeyance while, ~~If it is approved,~~ the Los Osos Community Services District ~~will~~ determines whether ~~to construct the approved system or~~ to pursue the county designed system or some other course."

We also think it would appropriate to acknowledge, within this discussion, that the CSD is currently considering an alternative system, which may be located in the Morro Shores area.

Page 3-40, Fire Protection: This discussion should be expanded to recognize that there are significant fire hazards posed by development that is surrounded by natural vegetation. To address this issue, the update should provide standards that require new development to be sited and designed to avoid disruption to sensitive habitats and visual resources. Additional standards to address the impacts to coastal resources posed by vegetation clearance activities designed to protect existing development should also be provided. 7-14C 7-18L

Page 3-49, Los Osos Water Management Program: While we support the intent of this program to provide a clean and sustainable water supply, we are concerned that by virtue of being a "Program" rather than "Policy", the provisions of the program have not been given appropriate status. Many of these provisions, such as the implementation of water conservation measures, should be required of all new development. 7-19L

Pages 3-52 and 3-53, Cayucos and Los Osos Drainage Plans: While we support the intent to undertake a cumulative assessment of cumulative drainage issues and impacts, we disagree that the implementation of specific measures to minimize the impacts of drainage on coastal resources should be put on hold until these drainage plans are developed. Rather, we recommend that the Update incorporate progressive performance standards for new development that require the inclusion of Best Management Practices for the control of polluted runoff. 7G-5

Page 4-5, Distribution of Land Uses: We disagree that the plan "provides a sufficient amount and arrangement of land use categories (zones) to meet projected population and economic growth until at least 2020, ***consistent with available resources and services***" (emphasis added). Please refer to Section I.B of this letter. 7G-3

Page 4-5, Marine Resource Policy: While we are supportive of this Policy, by itself it is insufficient for effective marine resource protection. As discussed above, we urge the inclusion of specific performance standards for new development that will ensure the protection of marine resources and coastal water quality. Accordingly, we suggest the incorporation of area-wide policies that require new development to be sited, designed, and constructed in a manner that will avoid erosion and sedimentation and protect aquatic habitats, among other means, by providing construction and post-construction Best Management Measures and adequate setbacks. These policies should allow the planning division to require additional setbacks, or expand upon 7G-5

specific performance standards, where necessary to protect marine resources and coastal water quality.

Page 4-7 and 4-8, Rural Area Land Use Policies: We agree with Policies 1-5 calling for the protection of agriculture, open space, and sensitive resources within the Estero Area, also reflected by policies B.1 3 on page 4-8. We are concerned, however, that the means of achieving these objectives have not been adequately articulated by the Update. For example, the Update does not, but should, provide additional tools for addressing non-conforming agricultural lots that prevent their conversion to non-agricultural uses. The Update itself appears to conflict with proposed Policy 5, prohibiting increases in density or expansion of urban areas if resulting development will adversely affect ground water supplies needed for agricultural use. 7-15C 7-20L

Page 4-11 and 4-13, Estero Marine Terminal Property: Why not require, rather than "support", provision of improved coastal access and amenities? 7-16C

Page 4-12, Recreation Policies: Policy 3 appropriately limits uses within Recreation areas to "recreation and visitor serving related uses". However, the types of uses allowed under the LCP's Recreation Land Use Category, per Table O, such as residential uses, appear to conflict with this objective. How will this be remedied? 7-17C 7-21L

Page 4-14, Residential Suburban Policies: We agree with the intent to avoid suburban development outside of the Urban Reserve line. However, we question the means of accomplishing this by directing it to the Los Osos Urban area, due to the fact that there does not appear to be adequate infrastructure to support existing, let alone additional, residential development. 7-22L

Page 4-16, General Cayucos Policy 2: We support the policy to prohibit expansion of the URL; the phrase "Generally" should be removed, as it weakens this policy. 7-18C(a)

Page 4-16, General Cayucos Policy 6: Limited residential development within office and commercial areas should be allowed only where it can be found that such development will not interfere with the provision of adequate facilities necessary to serve coastal access, recreation, and visitor-serving uses. A prohibition of residential development within areas having a vistior serving combing designation should be considered. 7-18C(b)

Page 4-18, Figure 4-1 (Cayucos Neighborhoods): Revisions to the URL/USL should be considered in order to bring the demand of water under buildout in line with available supplies. (This comment also applies to the Official LCP Maps.) 7-19C

Page 4-19, Cayucos Recreation Policies: The Policy 1 reference to Section F needs to be corrected. The text referring to Chapter 3 for programs to increase recreation opportunities is inappropriate, as Chapter 3 refers the reader the Chapter 4. How will the deficiency of neighborhood parks in Cayucos be resolved in light of the standards identified in Chapter 3? 7-20C

Page 4-21, Residential Single-Family design standards: please provide a reference to the section of the area plan providing the design standards being referenced by this new paragraph. 7-21C

Page 4-24, Policies for Official and Professional land use designations in the Cayucos Drive area: The proposal to allow single-family and multiple-family residential uses as principal uses in this land use category appears to conflict with the need to improve the jobs/housing balance, as discussed earlier in the area plan. 7-22C

Page 4-29, Figure 4-2 (Los Osos Neighborhoods): Please identify the USL on this map, and consider revisions to the USL/URL that would diminish service areas in accordance with limited water supplies and other infrastructure constraints. (This comment also applies to the Official LCP Maps.) 7-23L

Page 4-30 & 4-31, Los Osos General Policies: Please refer to the above comment, and Section I.B of this letter, regarding Policies 1 and 6. Policy 9 should require that street trees be drought tolerant and non-invasive. 7-24L

Page 4-32, Los Osos Recreation Policy 2: When encouraging the development of tourist-oriented facilities and activities, it should be noted that such development must be consistent with the protection of coastal resources (e.g., sensitive habitats and scenic views), and acknowledged that such development is dependent upon securing necessary public service capacities. Towards this end, the Update should incorporate policies that require the reservation of public service capacities needed to accommodate recreationally oriented activities and facilities. Parts d and e of this policy should require that recreational activities within or adjacent to sensitive habitats include specific monitoring and management measures to ensure that such activities take place consistent with the protection of the resources. 7-25L

Page 4-33, 3rd paragraph: It is difficult for us to concur with the statement that the "area above Highland Drive and below a future extension of South Bay Blvd [in] the Southeastern Hillsides is well suited to residential single family development, a hotel and conference center with accessory uses..." until we have been presented with a detailed assessment of the constraints of the site (e.g., habit and visual). The same applies to the proposed development of the Western Fringe area, as suggested in the 5th paragraph (please see our comments regarding page 7-140 of the Update). 7-26L

Page 4-36, Policies for Development in the residential Suburban Category West of Pecho Road: In encouraging the submittal of a single development application for this area, it should be noted that any development is dependent upon. being able to provide adequate services (e.g., water and sewer); avoiding the disruption of environmentally sensitive habitats; and, protecting scenic views to and from the coast. 7-27L

7G-2

Page 4-37, TDC Program: Please refer to Section I.A of this letter.

Page 4-42, Morro Shores Mixed Use Area: Policies for this area should ensure that future development does not preclude potential construction of a sewer treatment system in this area, as currently proposed by the CSD. They should also address the habitat protection/mitigation requirements for future development. (Such requirements should be articulated for all Land Use Designations within which future development has the potential to impacts sensitive habitats, even if it is just a reference to other LCP standards). 7-28L

Page 4-43, Commercial and Office Areas, Policy 5: Parking requirements should only be reduced if alternative methods of providing parking are shown to be adequate, particularly regarding the protecting of parking needed for coastal access and recreation. 7-29L

Page 4-4, Central Business District Policy 5: This and other policies contained in the Update suggest the streamlining of permit processing if certain provisions are included in development applications. How will the process be streamlined, and who will determine whether an application qualifies for streamlined processing? 7-30L

Page 4-45, Baywood Commercial Area Policy 7: Access to, and recreation along and on the Bay should be accompanied by interpretive facilities, as well as resource monitoring and management programs, to ensure habitat and water quality protection. 7-31L

Page 4-46, Baywood Commercial Area Policy 10: The proposed design plan appears to be more of a "program" rather than "policy". Until this plan is developed, the Update should provide more specific design standards, and requirements for new development, that achieve the objectives identified in this Policy. 7-32L

Page 4 49, Adeladia Planning Area: It is our understanding that this planning area is not within the Coastal Zone. Please clarify the relationship of this program to the LCP. 7-23C

Page 4-50, Public Facility: It appears that this Title is intended to be eliminated by the update; this is not reflected in the text. 7-33L

Page 4-51, Policy 3 for Cayucos regarding Seawalls: Please refer to Section I.C of this letter. In response to part b of this policy, private beach accessways should be prohibited if any portion of them would be located on public property or interfere with coastal access, recreation, or the protection of sensitive habitats. 7-24C

7G-2 Page 4-55, Program 5 (Los Osos Greenbelt): While we support the establishment of a greenbelt, its use as mitigation for impacts of new development on sensitive habitats is dependent upon evidence that such an approach will effectively protect special status species and the biological productivity of the area (please refer to Section I.A of this letter).

Page 4-62, County Parks: Please identify the location of all proposed parks on Land Use Maps. If the development of such parks pose impacts to sensitive habitats, these impacts should be evaluated by the Final EIR, and alternative sites should be considered. 7-34L

7G-5 Page 5-6, Areawide Circulation Policies: All circulation projects should be required to implement Best Management Practices for the control of polluted runoff during and after construction.

7G-6 Page 5-6, Rural Area Circulation Policies: We suggest incorporating additional policies that require new development to minimize the length and width of new or improved roadways, particularly when necessary to avoid the excessive conversion of agricultural land and minimize impacts to visual resources associated with road cuts along hillsides. Exceptions to this may be warranted if necessary to avoid development on prime agricultural land, prevent development

from being visible from public roadways, or to achieve adequate setbacks from sensitive habitats, provided that the resulting impacts from roadway construction are appropriately mitigated. Where extensive roadway development is needed to provide access to residential lots that are located a far distance from existing roads, reconfiguration of the lots should be considered, particularly if the intended use is residential. In such cases, exceptions to minimum lot sizes that would facilitate a more accessible configuration should be considered.

Page 5-9 through 5-11, Circulation Issues: Are the provisions listed under "Existing Deficiencies and "Future Needs" considered policies? Will new development be required to help address these deficiencies and provide needed improvements? 7-25C 7-35L

Page 5-11, Future Circulation Needs for Los Osos: We agree with the proposal to preserve rights-of-ways and offers of dedication for vertical and lateral accessways that serve coastal access and recreation. However, there may be some cases where existing paper streets could provide future access to parcels on which development would have significant adverse impacts to coastal resources (e.g., in wetlands or other sensitive habitats). In such cases, the County should consider abandoning a portion of the right-of-way so that general vehicle access would be inhibited, but public access, if needed and appropriately managed, could be accommodated. 7-26C 7-36L

Page 5-14, Arterial Improvements: The Coastal Act requires that Highway One remain two lanes in rural areas. The maximum length of the lanes (one mile) appears excessive; on what basis was this maximum established? How does this proposed expansion relate to potential improvements in the North Coast Planning Area? The proposed addition of passing lanes on Highway One West of Cayucos (as well as all other roadway improvements proposed by the Update) should require that any expansion of roadway widths necessary to accommodate these lanes should avoid the conversion of agricultural land, impacts to sensitive habitats, and the need for shoreline protective devices. 7-27C

Page 5-16, South Bay Boulevard Improvements: We have significant concerns regarding impacts to wetlands associated with the proposed improvement of this and other roadways in the Planning area (e.g., 3rd street extension). On what basis have these improvements been determined to be necessary and the minimum required? If there are no feasible means of avoiding this roadway expansion and associated wetland impacts, a prescription for the way in which such impacts must be mitigated should be provided by the Area Plan and evaluated by the Final EIR. 7-37L

Page 5-17, Collectors Improvements: Please see above comment, which is applicable to the proposed extensions of 3rd Street and South Bay Boulevard. (In the case of South Bay Boulevard, we are concerned about impacts to coastal scrub and maritime chaparral habitats.) Any other circulation improvements that pose impacts to sensitive habitats should be similarly analyzed, and alternatives that would avoid such impacts should be pursued. 7-37L

Page 5-20, Street Trees: Street Trees should be drought tolerant and non-invasive. 7-24L

Page 5-24, Equestrian/Hiking Trails: Please identify the importance of managing, monitoring, and maintaining trails and trail uses in order to protect sensitive habitats. 7-28C 7-38L

Page 5-24, park-and-ride lot: Please identify the proposed location of this facility so that it is taken into consideration by future development proposals. 7-39L

Page 5-29, Highway 1 Passing Lanes: Please see comment regarding page 5-14. 7-27C

Page 5-36, Baywood Park Area: Proposed program 4 appears to be referencing Figure 5-6 on page 5-37, but that is not what appears in the text. Please clarify. We are concerned that Figure 5-6, and the provisions of Program 4, do not provide adequate room for safe pedestrian and bicycle circulation. 7-40L

Page 5-36, Trails: We are supportive of the proposed trail links. This program appropriately acknowledges that trails located near riparian corridors and scenic areas must not cause impacts on sensitive resources. It should be clarified that this is not limited to riparian corridors and scenic areas, but applies to all sensitive habitat areas. This comment and program should not be construed to imply that trails are not allowed in such locations. Rather, the provision of such trails needs to be accompanied by appropriate management plans and interpretive facilities that will help prevent trail use from having adverse impacts. 7-41L

Page 6-4, Bluff Erosion GSA: Please consider revising the required setback on bluff top lots so that new development can withstand 100 years, rather than 75 years of erosion (see part I.C of this letter). Also, please clarify the intent of adding the phrase "generally" to setback requirements, which appears to substantially weaken the purpose of the GSA Combining Designation. 7-29C

Page 6-5, Sensitive Resource Area: In the paragraphs introducing this Combining Designation, please note that the location of sensitive resource areas are not dictated by LCP maps and figures, but are based on the actual presence of sensitive resources within a particular area. 7-30C 7-42L

Page 6-8, Coastal Strand, Coastal Sage Scrub, Dune Scrub, & Maritime Chaparral Habitat (SRA): We support the designation of such habitats as SRA's. Definitions of such habitats should be provided by the Update to ensure that they can be appropriately identified. In describing this SRA, it should be acknowledged that there are many patches of such habitat remaining within the urban area. As discussed in Part I.A. of this letter, we are concerned that the preservation of such SRA's has not been effectively addressed by the Update. 7-43L

7G-2 Page 6-11, Los Osos Habitat Conservation Policy 3: As previously noted, we can not support the off-site mitigation approach until a more complete assessment of its effectiveness is provided (please see part I.C of this letter).

Page 6-11, Los Osos Habitat Conservation Policy 6: The development of an HCP or NCCP appears to be more of a program than a policy, and is listed as a program on page 6-25. A more appropriate policy would be to require new development to conform to such a plan/program when one is in place. In the mean time, there needs to be policies that specify the minimum requirements for habitat protection and mitigation when development is proposed in sensitive habitat areas. 7-44L

Page 6-13, Los Osos Habitat Conservation Policy 7: While we support the monitoring efforts proposed by this policy, it is important to recognize that monitoring should not substitute for regulating new development in a manner that avoids cumulative impacts to sensitive habitats. Again, this appears to be more of a program than a policy. A more appropriate policy would be to require new development to provide biological monitoring and maintenance in a manner that is coordinated on a regional or sub-regional basis pursuant to the monitoring program. 7-45L

7G-2

Page 6-16, 2nd paragraph: Again, the proposal to use off-site mitigation for impacts to snail habitats in the Urban Area needs to be analyzed for effectiveness before this approach can be incorporated into the LCP. Until that time, sensitive habitat areas need to be preserved to the greatest degree feasible in their existing locations.

7G-5

Page 6-20, Morro Bay Estuary and Watershed Policies: While agree with and support these policies, we believe that they need to be accompanied by more specific policies that articulate the means by which the intent and objectives of these policies can be realized. (Please see part I.A of this letter.)

7G-4

Page 6-25, Program 5 regarding Seawalls: Please refer to part I.C of this letter.

Page 6-25, Habitat Monitoring: How will this program relate to, and be coordinated with, the LCP's Resource Management System? 7-46L

Page 6-26, Other Sensitive Habitat Protection Programs: Protection of the sensitive habitats listed in part b of this program should be required as a policy. An SRA Combing Designation should also be provided for these habitat areas. 7-31C 7-47L

Page 6-27, Morro Bay Estuary and Watershed Programs: Please refer to the above comments regarding page 6-25 and consider listing some of the program elements, such as monitoring and restoration requirements, as policies. 7-48L

Page 6-29, TDC Program: The overview of the proposed TDC programs refers to a Section of the CZLUO specific to a TDC program in the North Coast. How will this ordinance be changed and implemented with respect to the TDC programs proposed for Los Osos. How has the TDC program been working in Lodge Hill, and can the County's experience in administering that program provide guidance in perfecting this ordinance? Please refer to part I.A of this letter for our overall comments on the proposed TDC programs for Los Osos. 7-49L

Page 6-30, TDC Receiver Sites: Are any of the proposed receiver sites within the septic system prohibition area? If so, how will implementation of this program be coordinated in relationship to the required sewer project? Receiver sites should not be located in areas containing sensitive habitats. If proposed adjacent to sensitive habitats, receiver areas should have specific setback requirements and habitat protection measures defined by the program. 7-50L

Page 7-8, Areawide Resource Protection Standards: These resource protection standards should specifically prohibit land divisions that would create new lots in sensitive habitat areas or visually prominent locations. To the degree feasible, the consolidation of lots in such areas should be pursued by these standards. Parts A.1.b and e of these standards should not only 7-51L

require that the location and intensity of new development be designed to protect the sensitive features of the site, but the sensitive features adjacent to the site as well.

Page 7-8, Areawide Resource Protection Standards A.1.c: We do not agree that the avoidance of hazards on a site proposed for new development should take precedence over the protection of environmental, archaeological, and visual resources. There is no Coastal Act basis for such a hierarchy. Rather when policy conflicts occur, the Coastal Act calls for such conflicts to be resolved "in a manner which on balance is the most protective of significant coastal resources" (Coastal Act Section 30007.5). 7-32C

Page 7-9, Areawide Resource Protection Standard A.1.g: The means of preserving open space in accordance with this standard (e.g., conservation, deed restrictions, etc.), which achieves protection of the areas sensitive resources in perpetuity, should be articulated by this Policy. This standard, as well as others within the update, suggest that open space areas required to protect biological resources, should be in rough proportion to the impacts of the project. Please see our comments regarding the use of such language in part I.C of this letter. One of our concerns is that this policy could be interpreted to mean that quantity of area required to be placed in open space can only be equivalent to the area of footprint of the development located in sensitive habitat areas. Such approach would not adequately compensate for the habitat fragmentation and edge effects associated with the new development. Nor would it account for the overall loss of habitat that would be directly impacted by the development. 7-3C 7-7L

7-1AR Page 7-9, Areawide Resource Protection Standard A.1.h: The Final EIR should analyze the effectiveness of existing CZLUO clustering provisions with respect to the protection of sensitive habitats before this method is incorporated into the Update.

7-2AR Page 7-9, Areawide Resource Protection Standard A.2.a.(1): The proposed language implies that Sensitive Resource Areas and Environmentally Sensitive Habitats are only located in areas shown by LCP maps. Please clarify that it is the on the ground resources which define the extent of such areas. This is, in part, resolved by the following paragraph, which requires the protection of oak woodland, coastal strand, coastal sage scrub, dune scrub, and maritime chaparral habitats must be protected whether or not identified as a Sensitive Resource Area combining designation. We suggest adding "or any other area that meets the definition of an environmentally sensitive habitat area as defined by Section 30107.5 of the Coastal Act".

7-3AR Page 7-13, Multi-Family and Planned Developments: What are the maximum densities/intensities of development? If established by ordinance, please provide reference.

7-4AR Page 7-14, Common Open Space Requirements: We are concerned with the proposal to allow the use of sensitive habitat areas as common open space areas, as the purpose of the common open space (i.e. passive and active recreational use by residents of the development) may conflict with the protection of habitat values. Clearly such areas should be protected as open space pursuant to the Coastal Act and other LCP requirements. They should not, however, be considered as an area that is available to satisfy the recreational needs of new development.

7-5AR

Page 7-21, Areawide Drainage Standards: These standards should incorporate more specific requirements for achieving water quality and aquatic habitat protection objectives. These should include: the provision of specific construction and post construction Best Management Practices appropriate to the type of construction and land use(s) being proposed; the maintenance of natural drainage patterns, quantities, velocity, and quality, to the greatest degree feasible; and, minimum capacity standards for drainage facilities and selected BMP's.

7-52L

7-33C

Page 7-23 through 7-24, Archaeological and Historic Resources: The proposed standards should be reviewed for conformance with Coastal Act Section 30244. They do not appear to incorporate coordination with the State Historic Preservation Officer, as required by this section of the Coastal Act. Nor do they appear to involve consultations with the Chumash Tribe, who seem to have important interests regarding the protection of archaeological resources in the area. We are also concerned that proposed Standard 1 for Historic Resources limit the protection of such resources to those that are specifically identified by the Area Plan. Protection should be afforded to other structures that may be determined to be Historic subsequent to certification of the Plan. Similarly, we are concerned with the provisions of this standard, which restrict its application to the Historic structure itself, and an area within 200 feet of the structure. Protection should also be afforded to any other structure or facility on the site that is integrally linked to the historic structure and played a role in the historic use of the site. Finally, we are concerned that proposed Standard 2 for Historic structure provides too much discretion to the Planning Director in determining the appropriate method of preservation. While we agree with the intent of providing flexible means of achieving effective protection, it is necessary that all such alternatives be coordinated with the State Historic Preservation Officer.

7-6AR

Page 7-29, Rural Area Circulation Standard 3: We support this standard, which requires new road alignments to minimize terrain disturbance and vegetation removal. We suggest that this standard further require that new development be sited and designed in a manner that carries out this objective, in balance with the need to avoid the conversion of agricultural soils, impacts to sensitive habitats, and disruptions to scenic views.

7-7AR

Page 7-30, Lot Line Adjustment Standards for Rural Areas: We concur with standard 1.b.(2), which allows lot line adjustments to create parcels that are smaller than the minimum lot size specified by the CZLUO in order to protect sensitive and visual resources as well as agricultural viability. As noted at the top of this page, only legal lots can be adjusted. To confirm that a lot has been legally created, we request that any certificate of compliance or parcel map recorded on or after 1973 be referred to Commission staff for confirmation that Coastal Development Permit requirements associated with the recordation of the lot(s) have been satisfied. Finally, to avoid the suburbanization of agricultural lands, and the conversion of agricultural lands to non agricultural uses, we recommend that the Update include specific standards to address parcels that are non-conforming lots (i.e., existing lots that do not meet minimum parcel size standards). To the degree feasible, the Update should require consolidation of these lots with adjacent lots in order to achieve compliance with minimum lot size standards.

7-34C

Page 7-32 through 7-33, Visual Standards for the Morros Area SRA: Exemptions to visual protection standards for new development should only be granted when development can be

shown to not be visible form *any public viewpoint*, in addition to the viewpoints identified by part 1.a.(2). Similarly, the prohibition against ridgetop development established by part 1.g. should be applicable to development visible from any public area. More broadly, we would encourage these visual protection standards to be expanded in a manner that requires new structures to not be visible from any public area, by applying design provision, as well as location requirements, to the review process. Similarly, we suggest eliminating the allowance for new development to be located anywhere other than the least visible portion of the site, as suggested by 1.d. (i.e., "where visual impacts are reduced to an insignificant level"), unless necessary to protect sensitive habitats. Standard 1.i. should specifically prohibit land divisions that would create new lots in visually or biologically sensitive areas (please see comment below for additional information regarding biological issues).

7-53L

Page 7-32 through 7-33, Biological Standards for the Morros Area SRA: In addition to the application requirements established by part 1.b., an assessment of sensitive habitats, and potential impacts to such habitats, should be required as part of the development application. This information is needed to determine project compliance with part 1.c of this standard. With respect to 1.c., development should be designed and located to *avoid* (rather than *minimize*) impacts to important biological resources. Where avoidance is not possible, this standard should prescribe the type and amount of mitigation required to ensure that the biological productivity of the area is preserved.

7-54L

Page 7-34, Open Space Requirements for the Morros SRA: While we support the intent of the standard to achieve open space protection, we are again concerned about the statement that "the required open space area shall be in rough proportionality to the impacts of the project". (Please see part I.C of this letter.) For example, we are concerned that this might be interpreted in a fashion that limits the open space area to an amount equivalent to the footprint of the development, when, in fact, a much greater area may be warranted in light of the impacts associated with roadway construction, vegetation removal, landform alterations, or other aspects of development. Moreover, a greater open space area may be appropriate to avoid a public nuisance or achieve a legitimate public interest. We are also concerned about the prohibition against allowing for public access in such open space areas, unless desired by the property owner. The allowance of managed public access in such areas, regardless of the property owners desires may be appropriate in instances such as where there may be historic right to such access, or where the project will impact other areas of legitimate public access. We appreciate the identification of the means by which open space preservation requirements can be implemented (e.g., easements, agreements, etc.), but are unclear how participation in a TDC program would satisfy these requirements; please clarify. Also please include language that requires that the required open space to be preserved *in perpetuity*.

7-35C

Page 7-34 through 7-36, Visual Protection Standards for the Highway One – Cayucos Viewshed: Please see comments regarding page 7-32 through 7-33 (Visual Standards for the Morros Area SRA). In this case, views from the ocean should also be considered and incorporated into this standard. Additional standards should be provided to protect views of the shoreline and ocean available from Highway One and other public areas. Why exempt residential structures of less than 600 feet from the visual protection standards applicable to the area west of Cayucos?

7-36C

Page 7-39, Estero Marine Terminal: This standard prohibits new uses from being established on the site until the existing use is abandoned. Consideration should be given to exempting new recreational uses from this standard, in order to allow for continuance lateral coastal access and the establishment of a bike path. 7-37C 7-55L

Page 7-42, Estero Marine Terminal Abandonment: It should be clarified that the objective of the site restoration and environmental mitigation requirements are to return the site to natural conditions that facilitate its use for agricultural and recreational purposes. 7-38C

Page 7-44, Recreation Standards for Highway 41 area: Why are uses in this recreation category limited in a manner that excludes general public access and recreational uses? 7-39C

Page 7-44, Recreation Standards for Montana de Oro State Park: While it may be appropriate to refer to Development Plan D90119D, it should be done in a manner which recognizes that this permit may be amended or superceded by a future Coastal Development Permit. This standard should also acknowledge that any development in the area of Coastal Commission jurisdiction (e.g., areas below the mean high tide line) is subject to the review and approval of the Coastal Commission. 7-56L

Page 7-45, Standards for New development Seaward of Highway 1 Between the City of Morro Bay and the Cayucos Urban Reserve Line: In should be noted that new development in this area must comply with the Development Standards listed in part 2, *as well as all other applicable LCP requirements.* 7-40C

Page 7-46, Cayucos Urban Area Standard A: Evidence of adequate public services should be provided at the development review (CDP) stage, rather than, or in addition to, the building permit stage. In the case of water and sewer service, said evidence should identify the specific allocation being granted to the project, and the amount of service remaining available for new development within the service area. 7-41C

Page 7-46, Cayucos Urban Area Standard C: The allowance of condominium hotels and motels should be prohibited if they would replace or convert an existing transient occupancy use. 7-74C

7G-4

Pages 7-54 through 7-55, Table 7-1 (Special Setback Standards): Please refer to part 1.c. of this letter regarding coastal hazards.

Page 7-56, GSA Standard 2: This standard, regarding seawall appearance, should be expanded to address overall seawall design. Among the additional requirements that should be incorporated into this standard, seawalls should be designed to avoid any encroachment onto public beach area or sensitive habitat. This standard should also reference the requirements of CZLUO Section 23.05.090. 7-42C

Page 7-63 through 7-67, Mixed Use Development in the Cayucos Commercial Retail Area: Please refer to our overall comments regarding priorities for visitor-serving uses in part I.C. of this letter. General Standard c. should clarify that residential parking requirements must be satisfied *on-site.* 7-43C

Page 7-67, Standards for the Locarno Commercial Retail Area: Coastal access and recreational uses available to the general public should be included as a principally permitted use. 7-44C

Page 7-70, Mixed Use South of Ocean Avenue: Please see comments regarding pages 7-63 through 7-67.

Page 7-75, Residential Use on the 10-acre Parcel North of the Locarno Tract: The allowance of residential use on this site, which is designated for recreation, should be re-evaluated based on the lack of adequate water supplies (please see part I.B. of this letter), and the need for additional parks. Standards for residential development on this site should be expanded to address visual impacts from public areas, and any habitat values that may be present on the site. 7-45C

Page 7-77, Standards for Residential Multi-Family development in Cayucos: Do the height standards effectively protect views of the shoreline and ocean available from Highway One and Ocean Avenue, particularly in the Locarno Tract? Will the standard allowing for the waiver of curb, gutter and sidewalk requirements interfere with the provision of lateral coastal access? 7-46C

Page 7-94, Los Osos Urban Area Standards A and B: These standards should state that evidence of available water, and compliance with RWQCB requirements for on-site wastewater disposal, must be provided at the time of coastal development permit application. 7-57L

Page 7-96, Figure 7-37 (Los Osos Neighborhoods): Please identify the location of the USL on this map. 7-58L

Page 7-97, Extension of Community Services Beyond the Los Osos USL: Given the current lack of available water and sewer service, no extensions of such services should be provided outside of the USL. Please see part I.B. of this letter. 7-59L

Page 7-100, Extension of 3rd street and South Bay Boulevards: The extension of 3rd street should be prohibited if it can not be designed to avoid the loss of wetland habitats. This standard should specify performance standards for the water quality protection measures that must be provided by the project, such as the minimum performance and capacities of construction and post-construction BMP's. With respect to the proposed South Bay Boulevard extension, we can not agree that it is appropriate to include this project in the Update until it can be shown that road construction and the development the road will serve will effectively protect sensitive habitats. 7-60L

Page 7-100, Street Trees: In addition to the characteristics required by part d of this standard, trees should be non-invasive. 7-61L

Page 7-101, Extension of Stub Streets: This should only be permitted where no impacts to sensitive habitats will occur. 7-62L

Page 7-101, Bayfront Fences: In addition to the standards provided by G.2., fences should not interfere with the movement/migration of native wildlife. 7-63L

Pages 7-108 & 7-109, Figure 7-43 (Residential Development Potential New Land Divisions): It is not appropriate to suggest that it is feasible to subdivide parcels in Los Osos until evidence of 7-57L

adequate and sustainable water and wastewater treatment service is available. In the mean time, all subdivisions should be prohibited.

Page 7-112, Los Osos Coastal Access and Recreation Standards: Please refer to our concerns about the use of "rough proportionality" and "nexus" stated in part I.C of this letter. Amongst our other concerns, the proposed language could lead to the dismissal of access requirements on the basis that an existing access route would not being impacted by the development. Such an approach does not take into consideration the impacts that the development may place on other access and recreation facilities elsewhere in the region, through the increase in use that would be generated by the new development. Given the potential population increases posed by the Update, as well as the identified lack of public parks and recreation, the cumulative impact of new development may have significant impacts on existing public access and recreation opportunities, and therefore warrant requirements for access and recreation improvements. 7-64L

7G-1

Page 7-114, Land Divisions in Morro Bay SRA: No new parcels within sensitive resource areas should be allowed.

Page 7-114 & 7-115, Wetland Setbacks: Please show on a map the specific areas subject to the wetland setback requirements identified by Table 7-4. The final EIR should evaluate the adequacy of these setbacks to effectively protect wetland habitats. 7-65L

Page 7-116, Setbacks from Coastal Strand, Coastal Sage Scrub, Dune Scrub, and Maritime Chaparral: This standard only addresses setbacks for subdivisions, which should be prohibited within SRA's. It does not, but should, specify setback requirements for new development other than subdivisions proposed within or adjacent to such habitats. These setbacks should be reviewed for adequacy by the Final EIR. 7-66L

7G-1

Pages 7-117 and 7-124, Mixed Use Development in Los Osos: Please see part I.C. of this letter regarding priorities for visitor-serving development.

Page 7-126, Los Osos Commercial Retail design Guidelines: We agree that where feasible and consistent with natural resource protection, new development should provide access to the Bay. This should be required as a policy, rather than guideline. In order to protect natural resources, the policy should require interpretive facilities and monitoring and maintenance plans to accompany new accessways to the bay. 7-67L

7G-2

Page 7-130, South Bay Blvd. TDC Area: Please see our comments regarding the proposed TDC Programs in part I.A. of this letter. 7-67L

Page 7-133, Sweet Springs Preserve: Please refer to our concerns regarding the proposed extension of 3rd Street. This should not be identified as an allowable use until it can be shown that it will not involve adverse impacts to wetland habitats. 7-67L

Page 7-134, Cuesta Inlet: We question the appropriateness of allowing for residential development in this location given its designation of Recreation, the lack of adequate public services (including parks), unresolved issues regarding public trust lands, and potential impacts to sensitive habitats. 7-68L

Page 7-135, Sweet Springs: Again, residential development in this Recreation area must be questioned. Are there sensitive habitat values or other resource constraints that should be considered before the area of West of 4th Street is committed to residential use? On what basis was a credit of 1 dwelling unit per acre arrived at for the other areas? What is the maximum density of development allowed within the West of 4th Street area, and will this intensity of development pose adverse impacts on adjacent sensitive resource areas? 7-69L

7G-2

Pages 7-137 through 7-138, TDC program for the Southeastern Hillsides of Los Osos: Please refer to our overall concerns about the proposed TDC programs in part I.A. of this letter.

Page 7-140, West of Pecho – Western Fringe Area of Los Osos: Given this area's designation as a sensitive resource area, and its visual prominence, as well as the lack of public services, the allowable development type (hotels) and extent (maximum of 120 units and 10 acres of site disturbance) appears excessive. Public accessways and passive recreation uses should be allowed, with the understanding that they need to be sited, designed, and managed to protect natural and scenic resources. Specific resource protection standards and mitigation requirements for development of this site should be provided. 7-70L

Page 7-141, Los Osos Creekside Area Density Bonus: No land divisions or density bonuses should be allowed until adequate public services to accommodate such development have been secured. 7-71L

Page 7-141, Los Osos Creekside Area Setbacks: What constitutes "the *most significant* areas of habitat ..." for which a 100 foot setback must be provided? The Final EIR should evaluate the adequacy of this setback. 7-72L

Page 7-144, Morro Shores Mixed Use Area: Standards for any development in this area (i.e., not just pursuant to a Specific Plan) should ensure the effective protection of sensitive habitats, and should not preclude the proposed use of the site for wastewater treatment. If a proposed development involves potential impacts to threatened or endangered species, evidence of compliance with state and federal Endangered Species Acts should be provided at the time of Coastal Development Permit application (this should apply throughout the Planning Area). 7-73L

7G-2

Page 7-154 through 7-156, TDC Program for Southeastern Hillsides Area of Los Osos: Please see our overall comments regarding the proposed TDC Programs in part I.A of this letter.

Page 7-156 through 7-157, Standards for Southwestern Hillsides – Cabrillo Estates Area of Los Osos: These standards should emphasize the need for new development to protect sensitive habitats and visual resources, particularly in the upper hillside area. Given these constraints, and lack of public service capacities, no new parcels should be created. Public access connections through this area, that are sensitively designed and appropriately managed, should be listed as an allowable use. Driveways should be allowed to be constructed of pervious materials to maintain natural drainage flows and facilitate groundwater recharge. Minimum setbacks from sensitive habitat areas, which provide for adequate fire clearance without necessitating the removal of native vegetation, should be specified by these standards and analyzed by the Final EIR. Similarly, height limits should be analyzed for impacts to significant visual resources. 7-74L

Page, 7-158 through 7-159, Standards for the West of Pecho Sunset Area of Los Osos: Again, standards for this area should emphasize protection of habitat and visual resources, and prohibit the creation of new lots. Height limits should also protect views from the beach and ocean; additional design standards should be provided to achieve this. No development should be permitted until an adequate and environmentally sustainable source of water becomes available, and the public service capacities needed to accommodate Coastal Act priority uses has been set aside (this comment applies throughout the planning area). 7-75L

7G-2 Pages 7-162 through 7-165 and pages 7-173 through 7-174, South Bay Blvd. Area and Southwestern Hillsides Area TDC Programs: Please refer to our overall concerns regarding the proposed TDC programs in part I.A of this letter.

B. Draft EIR Text

7E-1 Page 5.1-1, Regulatory Setting for Transportation & Circulation Impacts: Please identify Coastal Act Section 30252 as part of the "regulatory setting", as the Update must conform to this and other sections of the Chapter 3 Policies of the Coastal Act. The Update's consistency with this Section should be analyzed by the Final EIR. Where inconsistencies are identified, mitigation and project alternatives that achieve Coastal Act conformance should be identified. (This applies to subsequent comments regarding the regulatory setting.)

7E-2 Page 5.1-18, Impact TC-1: The DEIR identifies that upon buildout of the Area Plan, segments of South Bay Boulevard, which serve commuters and recreational traffic, are projected to operate at LOS F. An analysis of how this diminished service will impact coastal access and recreation opportunities should be provided by the Final EIR. As noted in our above comments regarding the update, we have significant concerns regarding the proposed mitigation measure of widening South Bay Boulevard, which poses impacts to wetland habitats. This too should be further analyzed by the Final EIR. Project alternatives that would reduce impacts on important recreational corridors, and eliminate the need for road expansions that would adversely impact sensitive habitats, should be identified by the EIR.

7E-3
7E-4
7E-5 Page 5.4-16, Regulatory Setting for Water Resource Impacts: Please identify and analyze the Updates conformance to Coastal Act Sections 30231, 30241(e), 30250(a), 30254, and 30255.

7E-6 Pages 5.4-17 through 5.4-24, Water Resource Impacts and Mitigation Measures: The DEIR states that the Update would increase water demands in the planning area, for which there are not adequate water resources to serve such development. This would be a significant and unavoidable impact within the communities of Los Osos and Cayucos. We agree with Mitigation Measure WR-G1, which prohibits development under the Area Plan until adequate and dependable water supplies have been secured. This mitigation measure should also identify

7E-7 that once such water supplies have been identified and secured, they will be subject to an overall allocation program that reserved an amount of water necessary to accommodate Coastal Act priority uses (e.g., coastal dependent uses, coastal act access and recreation facilities, and visitor-serving developments) prior to being made available for other uses such as residential and general commercial and industrial. Given the significant unknowns regarding the extent of development that can be sustained by available water supplies, we do not think that it is

7E-8

appropriate for the Update to include any increases in buildout potential within the planning area. Moreover, we believe that it is critical for the Final EIR to identify alternative changes to the Area Plan that balance buildout with currently available water supplies. Since this is not possible in Los Osos, where existing withdrawals already exceed the safe yield of the groundwater basin,

7E-9

an alternative that will avoid any additional strains upon this resource, should be identified by the EIR and pursued by the Update. In addition to prohibiting new development for which a sustainable source of water is not available, this should include implementation of Mitigation Measures WR-G2 through WR-G5.

7E-10

Page 5.5-2, Regulatory Setting for Wastewater Impacts: Please identify Coastal Act Sections 30231, 30250, 30254, and 30255 and evaluate the Update's consistency with these requirements.

7E-11

Pages 5.5-7 through 5.5-9, Wastewater Impacts in Los Osos: We found the DEIR to be lacking the necessary information to address the critical problem of wastewater disposal in the Los Osos area, and the additional impacts to marine resources, water quality, recreation opportunities, and coastal dependent uses posed by the additional wastewater that will be generated by new development. We are concerned about the DEIR's assumption that wastewater issues will be effectively resolved by a community wastewater system, and do not agree that the Update will have a "beneficial impact" on wastewater. First, it can not be assured that the eventual sewer system will have the capacity to serve the increased buildout proposed under the area plan. The EIR should address this capacity issue. Second, the use of septic systems in the area outside of the currently proposed wastewater treatment service area would increase under the area plan, thereby posing adverse impacts to water quality that could diminish improvements realized to through the construction of a wastewater treatment system. The Draft EIR states, on page 5.5-12 that this is an insignificant impact because the wastewater treatment system is supposed to increase water quality. The DEIR does not, however, provide any data or evidence in support of this conclusion. Nor does the DEIR address the potential that development outside the prohibition area may occur well ahead of the establishment of a wastewater treatment system. The Final EIR should address these issues, and provide a more detailed evaluation of the potential impacts to water quality, aquatic habitats, and associated uses posed by the additional wastewater that will be generated outside the proposed sewer service area. (Please also refer to part I.B of this letter.)

7E-12

Page 5.6-8, Regulatory Setting for Drainage and Water Quality Impacts: Please cite, and analyze the Updated Area Plan's consistency with, Coastal Act Sections 30220, 30230, 30231, 30232, and 30253.

7E-13

Pages 5.6-11 through 5.6-16, Drainage and Water Quality Impacts and Mitigation Measures: Please refer to our previous comments in Part I.C of this letter, and those regarding pages 3-52, 4-5, 5-6, and 7-21 of the Update. As suggested by the comments, the Update should provide more detailed standards to ensure the effective protection of water quality and the adequate handling and treatment of drainage. Given the proposed standard's lack of specificity, and the absence of a detailed analysis of the effectiveness of these standards or other County requirements, we are not sure how the DEIR has concluded that development accommodated by the Update will not have a significant impact on drainage and water quality. The Final EIR

should evaluate the proposed standards developed in response to our request for more detailed standards, and suggest improvements or alternatives to these standards that would better achieve water quality protection and enhancement objectives.

7E-14 Page 5.8-21, Regulatory Setting for Biological Resource Impacts: Please include Coastal Act Sections 30230, 30231, and 30240 in this discussion, and analyze whether the Update complies with these standards.

7E-15 Pages 5.8-26 through 5.8-34, Impacts BR-1 through BR-5 and Community Specific Biological Impacts: It is acknowledged that increased urbanization and population may result in the direct removal of habitats, indirect effects on sensitive biological resources, and adverse impacts to aquatic habitats and species. In some cases, the DEIR states that the significance of these impacts is dependent upon site-specific assessments. In other cases, the DEIR states the impacts are significant and unavoidable. It is necessary that the Update provide standards that new development will not significantly disrupt sensitive habitats, either individually or cumulatively, to the greatest degree feasible. The EIR should provide a more detailed assessment of whether

7E-16 the Update meets this requirement, rather than relying on future project specific reviews. If the Update doesn't meet this requirement, the EIR should identify project alternatives that do. Where impacts can not be avoided, the Update should specify the minimum mitigation requirements necessary to protect the overall biological productivity of the area, and ensure the biological continuance of sensitive species. The EIR should, in turn, analyze the effectiveness of these measures. Please also refer to part I.A of this letter.

7E-17 Page 5.8-30, last paragraph, and Page 5.8-36, Mitigation Measure BR-13: In addition to prohibiting increased densities of development in sensitive habitats, the EIR should consider a mitigation measure that reduces allowable densities in known sensitive habitat areas.

7E-18 Page 5.8-34, Mitigation Measure BR-2: The minimum setback of a 100 feet from a wetland or riparian area should not be reduced, but only increased, based upon the recommendations of the required biological evaluation.

7E-19 Page 5.8-34, Mitigation Measure BR-9: In situations where avoidance of special-status plant habitats can not be achieved, mitigation should ensure that an area of equivalent biological type and productivity is restored and/or protected in perpetuity. This should be required in addition to the other mitigation measures identified for such circumstances.

7E-20 Page 5.8-36, Mitigation Measure BR-10: Additional means of avoiding erosion and protecting water quality should be required by this measure (please see Section I.A of this letter as well as our comments regarding pages 5.6-11 through 5.6-16 of the DEIR).

7E-21 Page 5.9.1.2, Regulatory Setting for Agricultural Resource Impacts: Please provide an analysis of the Update's conformance with the referenced Coastal Act Policies for all areas that will be converted from an agricultural land use designation. Please also refer to our comments on pages 4-7 and 7-30 of the Update regarding development on, and adjustment of, non-conforming agricultural lots.

7E-22 Page 5.10-2, Primary Viewing Corridors: Please identify views from public beaches, Morro Bay, and the Pacific Ocean as Primary Viewing Corridors, and analyze the impact on such views posed by new development that will be accommodated by the Update.

7E-23 Page 5.10-10, Impact AES-2: How was the allowable extent of development on the subject parcel(s) determined?

7E-24 Page 5.10-12, Impact AES-3: Please explain how the DEIR concluded that the proposed change in the land use designation for this area will not result in any change to the type or intensity of development allowed. While we understand that there are other coastal standards and policies that would be applicable to the area, it seems that the changes in land use category would expand upon the kind and amount of development that could be pursued.

7E-25 Pages 5.10-8 through 5.10-20, Aesthetic Impacts and Mitigation Measures: As detailed by the DEIR, the Update will have significant adverse impacts on the visual quality of the area, even without considering views from the bay and ocean. Mitigation measures rely upon exiting standards, project-specific reviews, and new SRA standards provided by the Update. The DEIR states on page 5.10-12, however, that reliance on these measures would not mitigate all the potential adverse impacts, and identifies that many of the residual visual impacts will be significant, including within all of the Los Osos impact areas. Additional standards that could avoid and minimize such impacts, specific to those areas on which new development will be accommodated in visually prominent areas, should be identified by the Update and evaluated by the EIR. These include, but are not limited to, additional siting, design, and lighting standards, as well as reductions in the allowable intensity of development. The Final EIR should also evaluate, and suggest mitigation measures for, the visual impacts posed by increased densities of development allowed by the proposed TDC Programs.

7E-26

7E-27 Pages 7-1 through 7-52, Alternatives: Please provide a more detailed description of each alternative, highlighting the *specific* differences with the draft plan. For example, please identify the alternative standards and or land use designations between that result in the different buildout potentials shown by Table 7-1 and described by Section 7.3.1. This is generally done in Section 7.4 for the Los Osos Focus Areas; a similar approach should be used for all other areas that will be affected by the Update. Most importantly, the EIR should include an alternative that seeks to balance the extent of buildout with the level of public services (particularly water and sewer) that is currently available, and reduce the amount of development in environmentally and visually sensitive areas to the greatest extent possible. To the degree that the development in such areas can not be avoided, a detailed mitigation program which provides specific measures to ensure that the overall biological productivity and visual quality of the area is preserved, should be identified.

C. Requested Amendments Document

As detailed in our comments above, we do not believe that any increase in development densities within or adjacent to areas that contain sensitive habitats, or prior to the demonstration of adequate and sustainable public service capacities, complies with Coastal Act requirements. Many of the requested amendments raise these same issues, as discussed below.

Kesner

Requested land use designation change (RS/RMF to RSF) will increase allowable number of dwelling units (from 2 to 9), water demand (from 0.8 to 2.45 acre-feet/year), and sewage generation (from 400 to 1,800 gallons/day) within the Los Osos septic system prohibition boundary. Such a change can not be found to be consistent with Coastal Act Section 30250(a) until evidence of adequate water supplies and sewer treatment capacities can be provided.

Miles

Request to establish community-wide (Cayucos) planning area standard that specifies condominium-hotels or motels where conventional hotels or motels are allowable. Please refer to our comments regarding *Priorities for Visitor-Serving Uses* in part I.C of this letter.

Morro Bay & Land Co.

Requested inclusion into USL and additional planning area standard will increase number of dwelling units (from 2 to 17), water demand (from 1.2o to 4.62 acre-feet/year), and sewage generation (from 400 to 3,100 gallons/day) within the Los Osos septic system prohibition area. In addition to lacking the necessary public services (water and sewer) to accommodate this proposal, we have significant concerns regarding the impacts of this change on wetlands and habitat for the Morro shoulderband snail.

Morro Shores Co.

In this case, the requested land use change (RMF to CS and RMF to RSF) will decrease allowable number of parcels (from 396 to 127), water demand (from 79.2 to 45.95 acre-feet/year), and sewage generation (from 79,200 to 38,983 gallons per day). Nevertheless, this proposal involves potential impacts to sensitive habitats that will need to be addressed in the Update process. We also recommend that the standards for this site ensure that potential construction of the needed wastewater treatment plant not be precluded by proposals for new development.

Van Beurden

This request to change land use designation from O/P to CR would not significantly increase water demand or sewage generation. It would, however, increase traffic volume, and involve the extension of South Bay Boulevard. Please see our concerns regarding impacts to sensitive habitats posed by the extension of South Bay Boulevard, as well as our comments regarding the impact to coastal access and recreation posed by increased traffic on South Bay Boulevard. We are also concerned about the impact of such development on Oak trees, which may adversely affect visual and habitat resources. These impacts should be addressed in more detail by the EIR.

Morro Palisades Co.

Request to change almost 112 acres of RSF to RS will decrease allowable number of parcels and dwelling units, water demand, and sewage generation. Nevertheless, the site is located within discharge prohibition area, where there is inadequate capacity to support even this reduced amount of potential development. The proposal also involves an extension of the Urban Services

Line, which is inappropriate until public service capacities necessary to accommodate development within the existing urban areas is accounted for. Finally, this area contains sensitive habitats that must be protected. Yet the proposed amendments would delete existing area plan language regarding site selection, capacity of services, and protection of sensitive plant species. While the proposed TDC program for this site is intended to provide for habitat protection, we have some significant concerns regarding the effectiveness of such programs, as detailed in part I.A of this letter. In addition, due to the voluntary nature of such programs, requirements for habitat protection in the case of non-TDC development must be retained.

Estero Bay Properties

We agree with the staff recommendation that the requested change from AG to RSF should not be included in the Update.

Nakamura Family

Our concerns regarding inadequate public service capacities, and impacts to sensitive habitats, also applies to this request, which would double the amount of allowable dwelling units (from 8 to 16) and increase water demand and sewage generation. While it is stated on Page 9-5 that development could be sited to avoid sensitive habitats, including those supporting Morro manzanita and Indian Knob mountainbalm, we are concerned about the fragmentation of habitat, increased erosion, and a greater potential to spread invasive, non-native plants identified on page 9-20.

D. Conclusion

Thank you for the opportunity to comment on both the Update and the DEIR. As you can see, we have significant concerns regarding the impact of the Update on coastal resources, and its conformance with Coastal Act standards. Most notably, we believe it essential that the Update limit buildout within the Estero planning area to a degree that can be supported by available public services, and that will sustain the biological and visual qualities of the coastal environment. The Update should also include additional and revised standards to ensure that new development will effectively protect coastal access and recreation opportunities, preserve agricultural resources, maintain coastal water quality, and avoid coastal hazards. Towards these ends, we request that greater attention to, and analysis of, the Coastal Act standards with which the Update must conform, be provided by subsequent drafts of the Update and the Final EIR. We hope that our comments and questions will assist the County in addressing these important issues.

Sincerely,

Charles Lester
District Manager
Central Coast District Office

Letter 7
Charles Lester
California Coastal Commission
November 25, 2003

SEE TABLES ATTACHED AT END OF CHAPTER 10.0

Nov 25 03 03:51p p.2

Letter 8

STATE OF CALIFORNIA – THE RESOURCES AGENCY GRAY DAVIS, Governor

CALIFORNIA COASTAL COMMISSION
CENTRAL COAST DISTRICT OFFICE
725 FRONT STREET, SUITE 300
SANTA CRUZ, CA 95060
(831) 427-4863

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SB

September 29, 2003

Chairperson Mike Ryan
San Luis Obispo County Board of Supervisors
County Government Center
San Luis Obispo, CA 93408

Subject: San Luis Obispo County Response to the *San Luis Obispo County Local Coastal Program Periodic Review*, adopted by the California Coastal Commission on July 12, 2001

Dear Chairman Ryan and San Luis Obispo County Supervisors:

I am writing to convey the California Coastal Commission's concerns regarding the implementation of its recommendations in the San Luis Obispo County Periodic Review. On July 12, 2001, the Coastal Commission adopted the Periodic Review of San Luis Obispo County's Local Coastal Program (LCP), which identified 165 actions the Commission determined are necessary and appropriate to fully carry out Coastal Act policies in San Luis Obispo County in light of new information and changed circumstances since certification of the LCP in 1988. Both the County and the Commission have committed significant resources towards implementing the recommended actions, and some progress has been made in carrying out the less controversial recommendations. However, in the two years that have transpired since periodic review completion, few substantive changes to the LCP have been made, and many important recommendations have yet to be addressed. The Commission reviewed the status of periodic review implementation efforts at its March and June 2003 meetings, and after considering several possible responses to the situation chose not to pursue legislative action at that time, and determined that renewed collaborative efforts between the County and the Commission, working toward effective implementation of the major recommendations, is the most productive way to proceed. In the interest of facilitating implementation of what the Commission deems to be the most important recommendations in the periodic review, we submit the following recommendations for action in Phases 1 and 2 of the County's implementation program[1]:

I. Phase 1

The Phase 1 amendments recently submitted for Commission certification partly respond to 67 of approximately 90 recommendations that the County originally agreed to consider. Notwithstanding the beneficial changes contained in the submittal, some modifications will be

[1] The timelines contained in these recommendations were developed in coordination with County and Commission staff.

needed to effectively implement the corrective actions[2]. The County should coordinate with the Commission staff regarding these adjustments so that the modified amendments can take effect before March 31, 2004.

II. Phase 2

The Phase 2 work program approved by the County should be supplemented and prioritized as follows, and the associated LCP amendments should be submitted for Commission certification by August 31, 2004:

A. Sensitive Habitat Protection

Phase 2 should complete the Phase 1 effort to replace the LCP's reliance on outdated maps for delineation and protection of environmentally sensitive habitat areas (ESHA) with a process to use actual on-the-ground, site-specific ESHA determinations (Recommendations 4.1, 4.2). Similarly, Phase 2 should include the incorporation of new standards to ensure accurate delineation of wetlands (Recommendation 4.30).

Other actions needed to protect important biological resources involve updating the LCP to effectively avoid, minimize, and mitigate the adverse impacts of new development on ESHA. Accordingly, the Commission supports the County's proposal to address Recommendations 4.2, 4.3, 4.5, 4.9, 4.10, 4.14, 4.15, 4.18, and 4.53 during Phase 2. A related action that should be included in this effort is the establishment of an LCP requirement to record conservation easements and/or deed restrictions to permanently protect ESHA on sites where new development occurs (Recommendation 4.13). In addition to these proposals, the Commission would hope that the County could address ESHA recommendations 4.08 – 4.32; but is specifically concerned and would like to see recommendations 4.08a, 4.26, and 4.32 included in Phase 2.

B. Water Quality

The Phase 1 amendments submitted by the County propose to apply, County-wide, the water quality protection standards recently put in place for residential and commercial development in Cambria and Avila Beach through the certification of the specific plans for these areas. At the same time, the County is developing related water quality standards as part of other planning efforts such as the Estero Area Plan Update, and a separate set of water quality standards is contained in the modified Grading and Drainage Ordinance Update recently approved by the Commission. In order to avoid internal inconsistencies, and provide consistent and effective implementation of water quality standards, the County should consolidate and complete the various LCP changes currently under consideration. In particular, the County should adopt the Commission's modifications to the Grading and Drainage Ordinance update as a means to

[2] Please refer to the Commission's staff's analysis of the draft Phase 1 amendments included in the staff report prepared for the Coastal Commission hearing of March 5, 2003.

establish baseline water quality standards, and develop complementary Phase 2 amendments that support and supplement these standards as well as eliminate redundancies and outdated language from the LCP. Ideally, this should include an update of the Chapter 9 Policies to better protect coastal water quality in accordance with periodic review Recommendation 3.7a.

With regard to broader watershed planning efforts called for by Recommendation 3.7b, the Commission has recognized that the development of watershed plans will require the involvement of multiple agencies. To facilitate these efforts, Phase 2 should incorporate a program into the LCP that will provide a framework for enhanced watershed planning. In addition, since the County is currently pursuing updates to Title 19 standards for septic systems, this update should also be coordinated with the Phase 2 amendments in response to Recommendation 3.6e.

C. Scenic Resources

Enhancing LCP protections for the highly scenic North Coast and "Morro Corridor" areas of the San Luis Obispo County coastal zone is an important component of the Periodic Review. The Commission therefore supports the County's decision to include a response to Recommendation 8.1 (protection of North Coast and Estero critical viewsheds) as part of the Phase 2 effort, recognizing that the initial focus will be on implementing this recommendation within the Estero Area, through the Estero Area Plan Update, as discussed below. We would expect, though, that updates to the North Coast Area Plan visual resource standards will be pursued in a timely fashion in a later phase of implementation. Phase 2 should also strengthen visual resource protection countywide by completing the Phase 1 effort to recognize and protect sensitive scenic resource areas (Recommendation 8.2), and by enhancing viewshed protection policies and ordinances in accordance with Recommendation 8.6.

D. Hazards

The Estero and North Coast Updates provide the appropriate opportunity to address coastal erosion hazard issues in the areas they are most prevalent, Cambria and Cayucos. However, an important periodic review recommendation applicable to the entire coastline is to avoid new development in areas at risk of coastal erosion by, among other ways, requiring development to assume the risk of building in hazardous areas and prohibiting future seawalls to protect new development (Recommendation 7.7). This provision should be included in the Phase 2 amendments. Among the other hazard recommendations that the County has proposed to deal with during Phase 2, an update of LCP fire clearance requirements (Recommendation 7.20) should be addressed as a priority.

E. Implementation Procedures

An essential step in the coastal development review process is determining whether a proposed development is the "principally permitted use" within the certified land use designation; this determination affects appealability, processing procedures, and the application of particular

development standards. In order to enable accurate and consistent determinations, Phase 2 should include the modifications to Table O called for by Recommendations 4.4 and 12.8. Other important procedural changes that should also be addressed by Phase 2 include the need to limit Coastal Development Permit Exemptions to those authorized by Section 30610 of the Coastal Act (Recommendation 12.4), and to provide for the appeal of all LCP Variances (Recommendation 12.18).

III. Grading and Drainage Ordinance Update

As an efficient means of implementing Water Quality Recommendations 3.2b-c, 3.6b-c, 3.9 and 3.12, as well as ESHA Recommendation 4.27, the County should adopt the modifications to the grading and drainage ordinance update (LCP Amendment 1-01 Part C) suggested by the Commission on March 5, 2003. Given that the County's acceptance may be contingent upon the Commission's certification of exclusions to permit requirements for specific categories of development (e.g., grading associated with agricultural production), the County should submit the proposed Categorical Exclusions before March 1, 2004; and work for full certification of both the exclusion and the modified Grading and Ordinance Update by August 31, 2004.

IV. North Coast Area Plan Update

The Board's recent authorization to initiate Phase 2 of the North Coast Area Plan Update, focused on the urban areas, provides the appropriate opportunity to address the significant public service and natural resource constraints to future development in Cambria, among other ways, by reducing buildout levels to those that can be sustained by available services without adverse impacts to coastal resources and public access and recreation opportunities (Recommendations 2.16 – 2.20). For example, submittal of the Update should be accompanied by a detailed analysis showing the level of development allowed by the plan, and how such development can be accommodated within existing public service capacities and resource constraints.

The Update should also include a comprehensive habitat protection plan for Cambria's valuable forest habitats (Recommendations 4.6, 4.36 – 4.47), and updated standards to minimize shoreline armoring along Cambria's coastal bluffs (Recommendations 7.1-7.7). Additionally, the Update should evaluate and update the Cambria TDC program as necessary to protect Community character, preserve forest resources, and maximize buildout reduction (Recommendation 8.9). Finally, the Update should include a specific Public Access component, in partial fulfillment of Recommendation 6.1. A draft of this Update should be available for public review by May 31, 2004, and the locally approved Update should be submitted for Commission certification by December 31, 2004.

V. Estero Area Plan Update

Similarly, the Estero Area Plan Update currently underway provides the appropriate vehicle for the County to:

- implement a comprehensive habitat protection plan to protect the sensitive dune habitats of the Los Osos area (Recommendations 4.6 and 4.36 – 4.47); 8-1
- address public service constraints to the buildout of the South Bay Urban Area (Recommendations 2.16 – 2.20); 8-2
- designate the Morro Corridor as a critical viewshed and enact improved visual protection standards for this and other scenic areas such as the Irish Hills (Recommendations 8.1, 8.2, and 8.6); 8-3
- develop a Shoreline Management Plan to address shoreline erosion and armoring issues in Cayucos (Recommendation 7.8); and, 8-4
- incorporate a Public Access component within the Area Plan (Recommendation 6.1). 8-5

Submittal of the Estero Update for Commission certification should occur prior to August 31, 2004.

VI. Other Outstanding Recommendations

Coastal Act Section 30519.5 requires the County to implement the actions recommended by the Periodic Review, or submit a report setting forth its reasons for not taking recommended actions within one year of the transmittal of the recommendations. However, the County has not yet responded to approximately 30% of the recommendations contained in the Periodic Review. The County should therefore, prior to January 31, 2004, submit a report explaining the reasons why it has declined to move forward with the adoption and implementation of the recommended actions that have not yet been addressed. This report should also address any Phase 1 and 2 recommendations that have not been pursued by the County.

VII. Phase 3

The recommended schedule for submitting the various LCP amendments identified above concludes in September 2004. These submittals should be followed by the submittal of a Phase 3 Implementation Work Plan, which should be submitted for Commission review and comment by January 1, 2005. This phase should include all recommendations not previously addressed in Phase 1, 2 or the January 31, 2004 report required above. Priorities for Phase 3 should include implementation of recommendations regarding:

- Lot-line Adjustments on Agricultural Lands (Recommendation 5.4)
- Processing of Certificates of Compliance (Recommendation 5.7)
- Residential Development on Agricultural Land (Recommendation 5.8)

Letter 8
California Coastal Commission
Periodic Review
September 29, 2003

8-1 The commission notes that the Estero Plan should implement a comprehensive habitat protection plan to protect sensitive dune habitats of Los Osos.

Response: The Plan includes a number of protective policies, programs and standards for the Los Osos Dune Sands and associated resources. The Plan refers to the Los Osos Sewer HCP currently underway; the plan provides the framework for the HCP in terms of development standards.

8-2 The commission notes that the Estero Plan should address public service constraints to buildout of the Los Osos area.

Response: The EIR discusses impacts to water, wastewater, police, schools, parks and fire departments associated with buildout of the Los Osos area.

8-3 The commission notes that the Estero Plan should designate the Morros Corridor as a critical viewshed and include improved visual protection standards for scenic areas.

Response: The Area Plan includes the Morros as an SRA and Critical Viewshed. Improvements to protection standards are largely being processed through the CZLUO amendment package and the development of a Morros Specific Plan (currently underway)/

8-4 The commission notes that the Estero Plan should include language to develop a Shoreline Management Plan to address erosion and armoring issues in Cayucos.

Response: A shoreline management plan is addressed on page 6-32 of the Area Plan.

8-5 The commission notes that the Estero Plan should incorporate a Public Access component.

Response: This information can be found in Chapter 8 and Appendix E.

Responses to Coastal Commission Staff's General Comments

Comment No.	Comment	Response
7G-1	The commenter is unclear as to how the proposed mitigation measures for biological impacts will be included in the Area Plan.	The proposed mitigation measures will generally be included as standards. The mitigation measure suggesting no increase in density in areas of sensitive habitat has already been incorporated into the plan, in that only minimum densities are allowed in portions of the planning area defined as sensitive in Chapter 6 and 7.
7G-2	The commenter is not certain that the Plan is aggressive enough in mitigating impacts to biological resources.	Overall buildout has been substantially reduced from the prior draft primarily by reducing development potential in environmentally sensitive habitat and reducing overall allowable densities, in most cases to the extent allowed under takings law. Policies and standards have likewise been revised to provide specific definitions and performance standards.
7G-2a	The commenter suggests that the plan needs to be consistent with the coastal act in allowing uses and density in environmentally sensitive areas. The coastal act generally allows only resource-dependent uses in areas of sensitive resources.	It is not feasible for the plan to designate only resource-dependent uses in Los Osos and Cayucos, due to existing entitlements for residential and other land uses. Therefore, the plan has been revised to substantially reduce density in these areas in accordance with takings law.
7G-2b	The commenter suggests that any alternative approaches to resources protection, such as TDC programs, need to be accompanied by evidence that such programs will avoid significant disruption of sensitive habitats.	In addition to the limitations on density in sensitive areas, the plan includes a number of policies and programs, including a TDC program, to address the issue of resource protection. Such a program would transfer development from more sensitive areas to less-sensitive areas, and would therefore help to reduce impacts on resources. Standards for potential TDC receiving sites require that TDCs shall not be transferred to environmentally sensitive areas. Other policies and programs in the plan complement strict development standards, and provide a contiguous framework for the protection of sensitive resources.
7G-3	The commenter is concerned that the level of development proposed by the plan cannot be accommodated with existing water and sewer.	Since 2000, more information has become available about both the Los Osos groundwater basin and the Nacimiento project. The plan has also been revised to substantially reduce development potential throughout the area. In Los Osos, projected water demand is largely in balance with supply. In Cayucos, projected water demand may exceed supplies (based on a conservative occupancy scenario); however, the development of the Nacimiento project would result in a surplus. The Plan includes policies requiring evidence of adequate services prior to development and/or subdivision, and which continue to support the Resource Management System, a regional assessment tool for the area's resources. The RMS system ensures that potential resource constraints are addressed on an annual basis, and that action plans are put in place, where necessary, in a timely fashion. More information is also available regarding the proposed sewer project in Los Osos. The plan has been revised to be consistent (and slightly lower than) the buildout assumed in designing the sewer capacity. The project is scheduled to begin construction in Summer 04. Adequate capacity exists at the Morro Bay treatment plant for buildout

		under the plan in Cayucos. The plan reduces densities in most cases to the extent allowable under takings law. Further reduction in allowable densities may invoke challenges under that law.
7G-3a	The commenter is concerned about deficiencies in water supply.	See above.
7G-3b	The commenter states that the RWQCB septic discharge prohibition in the Los Osos area will not prevent additional demand on water use, and that most development proposed by the plan is located outside of the prohibition area..	The commenter was responding to the 2000 EIR which showed an overdraft for the Los Osos Basin. This description of the basin is no longer accurate, as explained in the current EIR. Projected water demand at buildout is generally in balance with the safe yield of the ground water basin. Most development proposed under the plan is in fact concentrated within existing developed areas of Los Osos, most of which lie within the prohibition zone established by the RWQCB. The implementation of the prohibition has meant that only limited new development has taken place.
7G-3c	The commenter states that the ability of the proposed sewer project to recharge the Los Osos basin has yet to be established.	More information has become available regarding the recharge potential of the sewer project since the 2000 EIR. Recent studies now show that the sewer project would provide additional water volumes.
7G-3d	The commenter states that the EIR does not explain how allocations from Nacimiento would be secured, what the effects of drought would be, or what impacts would be associated with the construction of the pipeline.	The water supplies from Nacimiento would be secured through a water rights transfer between the City of San Luis Obispo and Cayucos of water from Whale Rock Reservoir. No new infrastructure is anticipated.
7G-3e	The commenter requests that the potential for residences to have higher occupancy rates be discussed in the Plan and EIR.	In Cayucos, assumptions of future demand include higher occupancy rates over the planning horizon, as discussed in the Plan.
7G-3f	The commenter requests substantial reductions in the buildout under the plan.	The plan has been revised to provide, in most cases, the minimum development necessary to avoid invoking takings law.
7G-3g	The commenter requests that all land divisions be prohibited until water supply issues are resolved.	The plan includes a policy to ensure land divisions are prevented unless it can be established that the division would not affect long-term water supplies.
7G-3h	The commenter suggests that no new development be allowed until sustainable water supplies are available, and wastewater capacity is established.	Refer to 7G-3
7G-3i	The commenter suggests development be restricted in Los Osos until more detail is available regarding the proposed wastewater system.	Refer to 7G-3

7G-4	**Seawalls:** Allowing seawalls where seawalls exist on adjacent parcels is inconsistent with Coastal Act, unless a sub-regional solution for sand replenishment is addressed in EIR.	A new program has been included in the draft plan to prepare an area-wide shoreline erosion and bluff management plan (page 6-32). The management plan should help determine the appropriateness of allowing construction of seawalls where seawalls exist on adjacent parcels.
7G-5	**Marine Resources/Water Quality.** The commenter is concerned that provisions in the plan to protect water quality and marine resources are not specific enough.	Policies have been amended throughout the plan to specify protection of marine resources in drainage planning, and the proposed CZLUO amendment provides more detailed standards regarding drainage.

Responses to Coastal Commission Staff's Specific Comments: Los Osos

Comment No.	Page/ paragraph	Coastal Commission Comment	Response
7-1L	3/1 (letter)	How will the # of TDC credits be determined?	To be determined based on subsequent study of sending and receiving sites.
7-2L	3/1 (letter)	How will increased density in TDC receiving areas affect sensitive habitat, cumulative impacts on biological resources within planning area? Why not designate receiving areas outside of sensitive habitat?	No impact since TDC receiver sites have been removed from lower portion of southeastern hillsides and the TDC program and planning area standards specify that credits can not be transferred to sites with sensitive habitat; receiving sites are almost entirely existing RSF lots that could be developed with secondary dwellings units (see response to 7G-2b).
7-3L	3/1 (letter)	Why is TDC program voluntary?	Mandatory TDC program may be illegal.
7-4L(a)	3/3 (letter)	Which areas contain valuable habitat, and where should dev. be available on non-sensitive habitat with off-site mitigation? The EIR should provide more specific standards for protection.	See responses to 7-1C, 7E-15, and 7G-2.
7-4L(b)	3/3 (letter)	More details regarding off-site mitigation.	The Plan provides the framework for the TDC program, but adoption of the plan would not result in implementation of the program. Further work is required to determine the feasibility and specific details of the program, but the plan contains other site development standards to guide development in sensitive areas. Off-site mitigation and mitigation banking are addressed in a policy (IVA3, pg 6-18) and a program (C1A, pg 6-33).
7-5L	3/last (letter)	EIR should evaluate impacts to habitat from 3rd St. and South Bay Blvd. extensions.	Both roadway extensions have been deleted from the plan (refer to Los Osos Urban Area Circulation: Roads map following page 5-41).
7-6L	6/2 (letter)	EIR should evaluate how proposed ag land conversions conform with Coastal Act Sections 30241-2.	Refer to Section 5.9 for a discussion of ag conversions.
7-7L	6/3 (letter)	Statements regarding nexus, rough proportionality unnecessary, limiting, could undermine requirements for coastal access, recreation.	Text has been revised to clarify the preparation and use of nexus and proportionality studies as follows (refer also to page 7-7 and 7-8) *Land dedications and other exactions identified in this plan are intended to mitigate the impacts of specific development proposals, and to insure consistency with the Local Coastal Program. In some circumstances, the county may conduct a nexus and proportionality study to provide the practical and legal basis for the proposed exactions. Dedications and exactions will be pursued consistent with Section 30001.5 of the California Coastal Act considering the need to:* *1. Assure the orderly, balanced utilization and conservation of coastal zone resources taking into account the social and economic needs*

			of the people of the state; and 2. *Maximize public access to and along the coast and maximize public recreation opportunities in the coastal zone consistent with sound resource conservation principles and constitutionally protected rights of private property owners.*
7-8L	6/5 (letter)	EIR should identify more detailed visual protection criteria, address visual impacts of TDC program.	See response to 7-4C.
7-9L	7/3 (letter)	Include specific standards to achieve setbacks for fire protection without removing vegetation that is biologically or visually sensitive; clarify permit requirements for vegetation clearance for existing development.	See response to 7-5C.
7-10L	7/last (letter)	EIR should evaluate archaeological protection standards for conformance with Section 30244 of Coastal Act and revise mitigation if needed.	See response to 7-6C.
7-11L	1-14	How do goals, policies relate to planning area standards, CZLUO, Coastal Plan Policies?	See response to 7-7C.
7-12L	1-15	Combining designation maps should be used for guidance only; environmentally sensitive habitats dependent on on-the-ground resources.	See response to 7-8C.
7-13L	2-17	How can a better jobs/housing balance be achieved?	See response to 7-10C.
7-14L	2-29 A1, B1	How was 2.3% growth rate determined? Are there adequate public services to accommodate this growth? Clarify relationship of Growth Management Ordinance to LCP?	See response to 7-11C.
7-15L	3-8,9	Show locations of URL and USL on Figures 3-1, 3-2.	See response to 7-12C.
7-16L	3-12, 3-13	Text and table should reflect existing overdraft in Los Osos and state that buildout will exceed available supplies in Los Osos, Cayucos.	See response to 7-13C.
7-17L	3-27	Update 3rd paragraph re. Los Osos sewer system; mention alternative plan proposed by CSD.	Page 3-27 has been updated to include information regarding the currently proposed sewer project.
7-18L	3-40	Address significant fire hazards caused by development surrounded by natural vegetation; include standards to address impacts of vegetation clearance and to avoid disruption of sensitive habitat, visual resources.	Addressed by planning area standards. See 7-5C.

7-19L	3-49	Water management program should be a policy; many provisions should be required of all new development.	Water demand is monitored through the Resource Management System (page 3-5). Development of a water management program doesn't lend itself to being a policy--need follow-up actions to accomplish; conservation measures can't be required of non-county water purveyors.
7-20L	4-7, #5	Update appears to conflict with Policy #5 (protecting groundwater supplies for ag, GPAs for increasing density, expanding urban areas).	Draft plan decreases buildout in Los Osos groundwater basin compared to existing plan (limited amount of agriculture within Los Osos groundwater basin), does not increase density in rural areas or expand URLs; it encourages ag uses and greenbelts and avoids spread of urban development into ag areas; places limits on development consistent with available water supplies. See also response to 7-15C.
7-21L	4-12 #3	Policy limits uses to recreation and visitor-serving, but Table O allows wide range of uses; how to remedy?	This policy applies to rural areas; uses are limited by planning area standards. See response to 7-17C.
7-22L	4-14 E	Directing development to Los Osos URL instead of rural areas inappropriate due to inadequate infrastructure.	This policy is simply to locate suburban development within the urban area in order to prevent urban sprawl; resource concerns addressed through plan policies, programs and standards.
7-23L	4-29,30,31 official maps	Show USL on Fig. 4-2, consider revising URL/USL, policies A1, A6 to balance water supply and demand.	Map will be hard to read; refer instead to other maps that show or will show location of USL; e.g., Map M17 following Chapter 7; water supply and demand are generally balanced.
7-24L	4-31 A9	Require that street trees be drought tolerant and non-invasive.	Standards on page 7-95 require street trees to be drought tolerant, disease-resistant, compatible with character of area; County's tree list excludes invasive species.
7-25L	4-32,C2	Require that recreational activities within or adjacent to sensitive habitat include monitoring and management measures to protect resources.	The plan has been revised to include policies requiring monitoring and management measures in areas of sensitive habitat (such as on page 7-15).
7-26L	4-33/3,5	Disagree that lower Southeastern Hillsides well suited to residential, hotel, conference center until detailed assessment of habitat, visual constraints; same applies to Western Fringe.	Lower hillside has been preserved. Development potential in terms of both uses and development area in Western Fringe is proposed at a substantially reduced amount. The area is included in an ESHA and is subject to habitat protection standards and greenbelt standards.
7-27L	4-36 F1	Note that development must have adequate services, protect habitats and scenic views.	Public services policies described elsewhere in plan (page 7-87 and 88); development can be approved only if adequate services exist. Development is subject to areawide resource protection standards, including view protection standards for new land divisions. Southeastern and southwestern hillsides development is required to be located at lower elevations, have a low profile, and adapt to the natural terrain.

7-28L	4-42	Policies for Morro Shores Mixed Use Area should allow sewer treatment facility and address habitat protection (should be mentioned for all land use categories where applicable).	Sewer treatment facility allowable by zoning and planning area standards; map on page 7-154 has been revised to include sewer treatment facility; standards for Morro Shores Mixed Use Area (E6, page 7-155) have been revised to require that development be clustered or concentrated away from environmentally sensitive habitat and cultural resources and to include a wildlife corridor; habitat protection standards on Pages 7-10 to 14 apply planning-areawide.
7-29L	4-43 I5	Reduce parking requirements only if alternative methods are adequate, especially re. parking for coastal access and recreation.	Issues associated with parking for coastal access are applicable only in Baywood. The plan includes a standard on page 7-95 which protects parking for coastal access while allowing alternatives to traditional parking provision.
7-30L	4-44 J5	How will permit process be streamlined in CBD, who will determine whether application qualifies?	See planning area standards on page 7-123: Potential reduction in permit level for projects that comply with all CZLUO, planning area standards, and guidelines.
7-31L	4-45 J7	Access to recreation along and on the bay should be accompanied by interpretive facilities, resource monitoring and management programs to protect habitat, water quality.	Revisions are shown on page 7-15.
7-32L	4-46 J10	Proposed policy to create design plan is more of a program; until design plan done, provide more specific design standards.	Plan has been revised to address design plans for the CBD and the Baywood commercial area through programs. Design concepts addressed by design guidelines on page 7-110, 7-127 and 7-132.
7-33L	4-50	Public Facility heading should be deleted.	Refer to page 4-53.
7-34L	4-62 E, F	Identify location of all proposed parks on Land Use Maps; EIR should evaluate any potential impacts to sensitive habitat.	EIR addresses impacts of parks throughout document as part of the buildout scenario and specifically in Section 5.7. Proposed parks shown on Map M25 at end of Ch. 7.
7-35L	5-9 - 5-11	Are provisions under "Existing Deficiencies" and "Future Needs" policies? Will new development be required to provide needed improvements?	See response to 7-25C.
7-36L	5-11 B5	Consider abandoning rights of way (eg. paper streets accessing potential development on sensitive habitat) to preclude vehicular access, while allowing other public access, if appropriately managed.	See response to 7-26C.
7-37L	5-16, 5-17 S.B Blvd. 3rd St.	Significant concerns re. impacts to wetlands of S.B. Blvd. widening in rural area, S.B. Blvd. extension, 3rd St. extension; on what basis determined necessary? prescribe method to mitigate for any wetland impacts.	Both extensions are deleted. Roadway improvements subject to resource protection standards. See also response to 7E-3.

7-38L	5-24 3	Identify importance of managing, monitoring, maintaining trails, trail uses to protect sensitive habitat.	Language on page 5-24 has been amended as requested.
7-39L	5-24 D	Identify proposed location of park-and-ride lot.	Park and ride lots are discussed on page 5-25; no new sites have been proposed.
7-40L	5-36 D4	Incorrect reference to Fig. 5-6; Figure 5-6 do not provide adequate room for pedestrians, bicyclists.	Reference no longer made.
7-41L	5-36 C5	Trails must not cause impacts to any sensitive habitat areas.	Language has been amended on page 5-24 as requested. Language protecting riparian corridors and scenic areas has been added on page 5-36.
7-42L	6-5 E	Note that location of sensitive resource areas not dictated by LCP maps, but by actual presence of sensitive resources.	Plan has been amended to clarify that unmapped areas meeting certain criteria are still considered sensitive (page 6-9) and are subject to ESHA standards in the CZLUO (page 7-12).
7-43L	6-8 5	Define coastal strand, coastal sage scrub, dune scrub & maritime chaparral; acknowledge that many patches of such habitat remain within urban area.	Information regarding specific habitat types can be found on page 6-12.
7-44L	6-11 A6	Preparation of HCP/NCCP is more of a program than policy; require new development to conform to such a plan/program when in place; need policies that specify minimum requirements for habitat protection, mitigation.	The HCP currently in preparation is designed as a voluntary program; landowners choosing not to participate in the communitywide HCP would be required to pursue their own consultation with the Fish and Wildlife Service. (See page 7-89). Information has been added on pages 6-18 through 6-24 to further describe the conservation efforts in the community. Appropriate ratios and fees for habitat loss will be determined through consultation with the Fish and Wildlife Service; likewise the Service will set conditions for new development. Habitat protection is addressed elsewhere in HCP/resource protection programs and standards (6-32, 7-89).
7-45L	6-13 A7	More of a program than policy; require new development to provide biological monitoring and maintenance coordinated on a regional or subregional basis.	New development is responsible for monitoring of project-specific mitigation--areawide monitoring for cumulative effects needs to be done by county or other entity, not individual developers. Habitat monitoring program is described on page 6-33.
7-46L	6-25 B2	How does habitat monitoring program relate to, coordinated with RMS?	Not part of RMS.
7-47L	6-26 C	Require protection of habitats in C1b; include in SRA.	See response to 7-31C.
7-48L	6-27 D	Consider listing some items as policies, e.g. monitoring, restoration.	See policies A3 and A7 on pages 6-18 and 19

L-49L	6-29 E3	How will CZLUO be revised for Los Osos TDC program? How has TDC program worked in Lodge Hill? Perfect the CZLUO based on county experience in administering program.	Lodge Hill program successful--not administered by county. CZLUO being amended concurrently with the Area Plan under a separate package.
7-50L	6-30 b	Are any TDC receiver sites within sewage "prohibition area"? How will TDC program be coordinated with sewer project?	All receiver sites within prohibition area; by the time the TDC program goes into effect, the sewer will likely be built. Adoption of the Estero Plan will not result in implementation of a TDC program; only the framework is established. In order for the TDC program to be implemented, more work is required.
7-51L	7-8 A1b,e	Location and intensity of new development should protect sensitive features adjacent to site also.	A1b has been revised as requested.
7-52L	7-23,24 G,H	Review standards for conformance with Coastal Act 30244; is coordination with State Historic Preservation Officer required per Coastal Act? Consultations with Chumash? Allow for protecting historic resources that may be subsequently identified; protect any structures on site integral to historic structure; too much discretion to Planning Director in determining method of preservation--coordinate with State Historic Preservation Officer.	Standards have been deleted.
7-53L	7-32 - 7-33 Morros visual standards	Grant exemptions to standards only when development not visible from *any public viewpoint* (1a); prohibit ridgetop development where visible from *any* public area (1g); encourage new structures to not be visible from any public areas; do not allow alternative development locations, except to protect sensitive habitats (1d); prohibit land divisions in sensitive areas (1i).	See response to 7-34C.
7-54L	7-32 - 7-33 Morros biological standards	1b: require assessment of sensitive habitats and impacts as part of development application in order to implement 1c; 1c: design and locate development to *avoid*, rather than minimize impacts; otherwise prescribe type and amount of mitigation required.	Revised text can be found on page 7-27; mitigation measures are site specific, to be determined based on required biological report.
7-55L	7-39 C1	Allow new recreational uses prior to abandonment of facility to allow continued lateral coastal access and bike path.	See response to 7-37C.
7-56L	7-44 REC, B	Acknowledge that Development Plan for Montaña de Oro may be amended or superceded, and that development in Coastal Commission jurisdiction subject to review, approval by Coastal Commission.	Revised as requested on page 7-37.

7-57L	7-94 A, B	Provide evidence of available water, compliance with RWCQB requirements at time of permit application.	Standards have been revised to require an intent to serve with water and sewer from the purveyors prior to acceptance to land division and use permits (page 7-88) and clearance for services prior to building permit approval; projects must comply with RWQCB standards prior to building permits; more appropriate for RWQCB to verify compliance prior to building permit issuance to reflect changes in project from time of application submittal.
7-58L	7-96	Show USL on Fig. 7-37.	Map will be hard to read; refer instead to other maps that show or will show location of USL; e.g., Map M17 following Chapter 7
7-59L	7-97 2	Do not allow extension of water, sewer services beyond USL due to lack of available services.	The standard has been deleted.
7-60L	7-100 E1,2	Prohibit extension of 3rd Street if loss of wetlands can not be avoided; do not include South Bay Blvd. unless development served by road will protect sensitive habitat.	Both extensions have been deleted.
7-61L	7-100 3d	Street trees should be non-invasive.	Tree list used by staff excludes invasive species.
7-62L	7-101 4a(3)	Permit extension of stub streets only where no impacts to sensitive habitat.	Text on page 7-95 has been amended as requested.
7-63L	7-101 G2	Fences for bayfront development should not interfere with movement/migration of native wildlife.	Text on page 7-97 has been amended as requested.
7-64L	7-112 A	Requirement for rough proportionality and nexus could lead to inappropriate dropping of access requirements; doesn't recognize cumulative impacts of development on access, recreation opportunities.	Reference has been deleted, see response to 7-7L.
7-65L	7-115 Table 7-4	Show areas subject to wetland setbacks on map.	Figure 7-47 has been added on page 7-116 to show wetland setbacks.
7-66L	7-116 6	Setbacks adjacent to public holdings on western, southern fringes of URL should apply to all development; EIR should evaluate adequacy of setback.	The setback has been increased and applied adjacent to all public land on the fringe of Los Osos per text on page 7-122; adequacy of setbacks are too site-specific to address in Area Plan EIR; adequacy will be addressed through the required biological report.
7-67L	7-126 Design Guidelines	Require access to bay, where feasible and consistent with natural resource protection, as a policy rather than guideline; require interpretive facilities and monitoring and maintenance plans to accompany new accessways to bay.	Addressed by revised standard on page 7-15.

7-68L	7-134 A	Is residential development appropriate considering lack of public services (including parks), questions about jurisdiction, impacts on sensitive habitat?	Development potential has been reduced to the minimum level possible, and standards to protect resources have been included. (Page 7-142)
7-69L	7-135 B	Question residential development in REC category; sensitive habitat in area west of 4th Street? Why credit of 1 unit/acre? What is maximum density west of 4th Street--will it cause adverse impacts on sensitive resources?	No development to be allowed in REC category; area adjacent to 4th Street is RSF; RSF area does not appear to have wetlands, but proposed policies require: biological report to delineate any wetlands, development to set back from any on-site, adjacent wetlands, not cause adverse impacts to wetlands or estuary; maximum theoretical development potential of entire property: 1.8 acres of RSF + 6.2 acres of open space = 13 units. This reflects EIR recommendation to eliminate the 1 unit/acre credit in the REC category to limit density in areas of sensitive resources.
7-70L	7-140 F	120 lodging units on 10 acres is excessive due to visual and habitat sensitivity, lack of services; allow public accessways, passive recreation; specific resource protection, mitigation standards for development.	The property is subject to a number of standards to protect habitat and views. The maximum amount of site disturbance has been reduced to less than 20% of the entire site area in order to protect resources and the number of lodging units has been reduced (page 7-148).
7-71L	7-141 A2	Do not allow land divisions or density bonuses until adequate public services provided.	The density bonus has been eliminated.
7-72L	7-141 A3	What are "the most significant areas of habitat..."? DEIR should evaluate adequacy of setback.	***Delete this phrase: "...upland extent of riparian vegetation, and ~~the most significant~~ areas of habitat that support rare, endangered or threatened species as ..."***; page 7-149; setbacks too site-specific to address in Area Plan EIR.
7-73L	7-144 D	Standards should protect sensitive habitats, allow wastewater treatment; require evidence of compliance with state and federal Endangered Species Acts at time of permit application--apply throughout planning area.	Standards have been substantially revised; the commenter is referred to pages 7-153 through 7-159. Sewer treatment is discussed under Office and Professional, Public Facilities on pages 7-139 and 140. Fish and Wildlife Service will determine compliance with ESA through Section 10 process.
7-74L	7-156 H 7-172 A	Allow public access connections that are sensitively designed, appropriately managed; allow driveways to be constructed of pervious materials for drainage, groundwater recharge; specify minimum setbacks from sensitive habitat that provide adequate fire clearance without removal of native vegetation; analyze in EIR; evaluate height limits for impacts to visual.	See preceding items 38 and 67 regarding trails, coastal access (limitation on use, item G-3, page 7-163 is for *existing* Cabrillo Estates–coastal access is allowable on the undeveloped Pratt property); all-weather or non-skid surface (depending on driveway grade) needed for fire safety purposes (driveway construction standards in item G5, page 7-164 are for *existing* Cabrillo Estates per tract conditions or CCRs); minimum setbacks from sensitive habitat set by CZLUO--in general no grading within 100' of env. sensitive habitat, adjustment to 50' possible; grading in setbacks is covered by the CZLUO (see also response to 7-5C for new standard regarding setbacks for fire and habitat protection). Setbacks and height limits too site specific to be evaluated in area plan EIR--would be evaluated by project-specific environmental determination.

7-75L	7-158-9	Emphasize protection of habitat, visual resources; height limits, design standards to protect views from beach, ocean?	This area is already developed per Tract 1589.

Responses to Coastal Commission Staff's Specific Comments: Cayucos

Comment No.	Page/paragraph in Coastal letter (letter) or 2000 Draft Plan	Coastal Commission Staff Comment	Response
7-1C	3/3 (letter)	Which areas contain valuable habitat, and where should development on land without sensitive habitat be available with off-site mitigation?	The mapped SRAs in the Draft Plan and the criteria for unmapped ESHA define areas of valuable habitat. Off-site mitigation and mitigation banking are addressed in a policy (see IV.A.3, pg. 6-18) and program C.1a (page 6-33).
7-2C	6/2 (letter)	EIR should evaluate how proposed ag land conversions conform with Coastal Act Sections 30241-2.	Refer to Section 5.9 for a discussion of ag conversions.
7-3C	6/3 (letter)	Statements regarding nexus, rough proportionality are unnecessary and limiting, could undermine requirements for coastal access, recreation.	Text has been revised to clarify the preparation and use of nexus and proportionality studies as follows (refer also to page 7-7): *Land dedications and other exactions identified in this plan are intended to mitigate the impacts of specific development proposals, and to insure consistency with the Local Coastal Program. In some circumstances, the county may conduct a nexus and proportionality study to provide the practical and legal basis for the proposed exactions. Dedications and exactions will be pursued consistent with Section 30001.5 of the California Coastal Act considering the need to:* *1. Assure the orderly, balanced utilization and conservation of coastal zone resources taking into account the social and economic needs of the people of the state; and* *2. Maximize public access to and along the coast and maximize public recreation opportunities in the coastal zone consistent with sound resource conservation principles and constitutionally protected rights of private property owners.*
7-4C	6/5 (letter)	EIR should identify more detailed visual protection criteria, address visual impacts of TDC program.	The CZLUO amendment package has detailed standards for visual protection. The draft plan proposes standards to: *- prohibit land divisions unless building sites are located such that they are not on slopes or ridgetops so that structures are silhouetted against the sky as viewed from public roads, public beaches, ocean, or Morro Bay estuary (page 7-13)* *-prohibit land divisions where access roads and building sites would be located on slopes greater than 20 percent*

7-5C	7/3 (letter)	Include specific standards to achieve setbacks for fire protection without removing vegetation that is biologically or visually sensitive; clarify permit requirements for vegetation clearance for existing development.	Draft plan has standards to concentrate development in least sensitive areas, include buffers to protect sensitive vegetation, to require that fuel breaks not cause adverse impacts to sensitive habitat, and to design fuel modification areas to be in addition to and on the development side of the required setback from sensitive habitat (2d, page 7-12): *Where possible, design land divisions/development so that fuelbreaks and vegetation or fuel modification areas that are needed to reduce fire hazards do not disrupt or cause adverse impacts to sensitive features listed in preceding paragraph a. Fuelbreaks and vegetation or fuel modification areas shall be located on the development side of required setbacks from sensitive features, and shall be in addition to the required setbacks, as shown in Figure 7-1*; per CZLUO, veg. removal in env. sens. habitats requires land use permit, except less than .5 acres in connection with crop production and grazing.
7-6C	7/last (letter)	EIR should evaluate archaeological protection standards for conformance with Section 30244 of Coastal Act and revise mitigation if needed.	The EIR analysis does address impacts to archaeological resources per Section 30244, and considers existing CZLUO standards (refer to Section 5.12). Proposed archaeological protection standards in the CZLUO amendment package are addressed in the proposed ND for those amendments.
7-7C	1-14	How do goals, policies relate to planning area standards, CZLUO, Coastal Plan Policies?	Goals and policies are implemented by planning area standards, but also function as criteria for development proposals, especially where no specific standards; they do not supersede CZLUO or Coastal Plan Policies, but are designed to be consistent with and in addition to them.
7-8C	1-15	Combining designation maps should be used for guidance only; environmentally sensitive habitats dependent on on-the-ground resources.	Addressed by resource protection standards, pages 7-10 to 7-12; plan has been amended to clarify that unmapped areas meeting certain criteria are still considered sensitive (page 6-9) and shall comply with applicable ESHA standards in the CZLUO (page 7-12, 2b).

7-9C	2-9, Goal 10	How will this affect demand for visitor-serving facilities? Impact on scenic, coastal resources compared to distributing facilities in a greater area?	Sites for major new tourist-oriented commercial development are severely limited in Cayucos. Goal 10 refers to one 3-acre site that will provide visitor-serving facilities and opportunities for coastal access. The proposed site is the most logical and feasible site for a major new tourist-oriented development in the community and would help to address demand for visitor-serving facilities in Cayucos. Such facilities are already spread along Ocean Avenue and have priority in this area as a land use. The area plan includes specific standards for this site which require public access (pg. 7-59 and 7-60). Therefore, the project may enhance, rather than inhibit, coastal access. Principally-permitted uses are recreation-oriented and visitor-serving. Concentrating development in this area is the most feasible option for provision of visitor-serving facilities. Dispersion of new visitor-serving uses in not feasible due to the largely developed nature of the community. The EIR notes that impacts associated with visual resources in Cayucos are considered less than significant, primarily due to the largely developed nature of the community and measures contained in the Area Plan and the CZLUO amendment.
7-10C	2-17	How can a better jobs/housing balance be achieved?	In Cayucos and Los Osos, jobs/housing balance will improve somewhat at buildout. More commercial service could improve the situation, however, potential locations are very limited, especially in Cayucos.
7-11C	2-26 A1, B1	How was 2.3% growth rate determined? Are there adequate public services to accommodate this growth? Clarify relationship of Growth Management Ordinance to LCP?	The proposed growth rate, as recommended by the communities, is consistent with the countywide growth rate. The policy implements the County General Plan, but would require amendment of Title 26 separate from the Area Plan. Public service capacities are addressed by other policies (see table of responses to Coastal Commission staff's general comments); the plan does not rely on establishing a growth rate to address service capacity issues. The Growth Management Ordinance is Title 26 of County Code (not part of LCP) and applies countywide.
7-12C	3-8,9	Show locations of URL and USL on Figures 3-1, 3-2.	Figure 3-1 has been revised to show the URL/USL for Cayucos. Showing the USL on Figure 3-2 would detract from its readability.
7-13C	3-12, 3-13	Text and table should reflect existing overdraft in Los Osos and state that buildout will exceed available supplies in Los Osos, Cayucos.	Information regarding water supply and demand is shown in FEIR in Tables 5.4-6 through 5.4-9.

7-14C	3-40	Address significant fire hazards caused by development surrounded by natural vegetation; include standards to address impacts of vegetation clearance and to avoid disruption of sensitive habitat, visual resources.	Addressed by planning area standards. See preceding Item 5
7-15C	4-7, #5	Update appears to conflict with Policy #5 (protecting groundwater supplies for ag, GPAs for increasing density, expanding urban areas).	Draft plan decreases buildout in Los Osos groundwater basin compared to existing plan (limited amount of agriculture within Los Osos groundwater basin), does not increase density in rural areas or expand URLs; it encourages ag uses and greenbelts and avoids spread of urban development into ag areas.
7-16C	4-11, #12 4-13, #4	Require (rather than just support) improved coastal access, such as a bicycle/pedestrian path connection between Morro Bay and Cayucos, with new development/renewal of lease at Estero Marine Terminal.	Revised text can be found on page 4-17: *"Pursue improved coastal access and amenities south of Cayucos, such as a bicycle and pedestrian path, connection between Cayucos and the City of Morro Bay."* (See also program E.2b on page 4-70 and the rural area circulation map at the end of Chapter 5.)
7-17C	4-12 #3	Policy limits uses to recreation and visitor-serving, but Table O allows wide range of uses; how to remedy?	This policy applies to rural areas; uses are limited by planning area standards.
7-18C(a)	4-16 A2	Delete "generally" from policy to not expand Cayucos URL.	"Generally" allows for future school site to be included in URL, as described in Policy #3.
7-18C(b)	4-16	Residential use should only be allowed in commercial and office areas if it would not adversely affect the provision of coastal access, visitor-related services and recreation.	Standards for mixed-use development in downtown Cayucos require findings regarding impacts on visitor-serving uses and parking, while including a cap on the number of residential units and requiring residential units to occupy the upper floor.
7-19C	4-18, official maps	Consider revising URL/USL to balance water supply and demand.	URL/USL in Cayucos generally encompasses existing developed areas; can't remove those areas; Maino property should not be removed, because it is within Sanitary District, but Draft Plan greatly limits development potential and envisions water supply from other than Whale Rock Reservoir.
7-20C	4-19, B1, text	Correct references to Section F, Chapter 3; how will deficiency of neighborhood parks be resolved in Cayucos?	Text has been moved to Section VI, E, page 4-70.
7-21C	4-21/2	Reference small-scale design neighborhood standards.	Reference has been made to Ch. 7, Section V, Cayucos Urban Area Standards, RSF category.

7-22C	4-24	Residential as principal uses hurts jobs/housing balance.	Cayucos Drive already mixed use; limited opportunities for significant employment, historically limited demand for office; minor impact on jobs/housing balance.
7-23C	4-49 A2	Clarify relation of Adelaida Planning Area to LCP.	Adelaida is outside of coastal zone, but affects Estero, such as in the case of views.
7-24C	4-51 B3	Prohibit private beach accessways (that are incorporated into seawalls) if any portion located on public property or interferes with coastal access/recreation, protection of sensitive habitat.	Revised text can be found on page 4-57 (B2a); CZLUO 23.05.090 requires shoreline structures to not preclude public access or adversely impact fish and wildlife, minimize erosion.
7-25C	5-9 - 5-11	Are provisions under "Existing Deficiencies" and "Future Needs" policies? Will new development be required to provide needed improvements?	"Existing Deficiencies" and "Future Needs" are not policies; new development to comply with policies & improvements in Ch. 5--the Circulation Element--and standards in Ch.7; circulation fees to also fund improvements.
7-26C	5-11 B5	Consider abandoning rights of way (eg. paper streets accessing potential development on sensitive habitat) to preclude vehicular access, while allowing other public access, if appropriately managed.	Can't abandon rights of way needed for access to property; proposed policy is to preserve rights of way and offers of dedication to preserve public access (doesn't have to be vehicular) to bayfront and public recreation areas (coastal access), and to complete circulation system.
7-27C	5-14 2a	How was 1-mile maximum length of passing lanes determined? (seems excessive); relation to improvements in North Coast?, any road widening should avoid ag conversion, impacts to sensitive habitat, shoreline protective devices.	I-mile limit from CCC comments on North Coast (10% of road segment), 1 eastbound, 1 westbound passing lane consistent with North Coast at 0.5 miles each; road standards regarding agricultural soils, habitat, and shoreline protective devices have been incorporated into the draft CZLUO amendment package (pg. 9).
7-28C	5-24 3	Identify importance of managing, monitoring, maintaining trails, trail uses to protect sensitive habitat.	Revisions are shown on page 7-15, and 5-24.
7-29C	6-4 B2	Clarify use of "generally" re. setback requirements--weakens purpose of GSA designation.	Reflects exceptions provided for in CZLUO.
7-30C	6-5 E	Note that location of sensitive resource areas not dictated by LCP maps, but by actual presence of sensitive resources.	Addressed by resource protection standards, pages 7-10 to 7-12; plan has been amended to clarify that unmapped areas meeting certain criteria are still considered sensitive (page 6-9) and shall comply with applicable ESHA standards in the CZLUO (page 7-12, 2b).
7-31C	6-26 C	Require protection of habitats in C1b; include in SRA.	These areas are generally within SRAs or meet the criteria for unmapped ESHA, and are therefore subject to areawide resource protection standards in Ch. 7.
7-32C	7-8 A1b,e	Location and intensity of new development should protect sensitive features adjacent to site also.	A1b has been revised as requested.

7-33C	7-23,24 G,H	Review standards for conformance with Coastal Act 30244; is coordination with State Historic Preservation Officer required per Coastal Act? consultations with Chumash? Allow for protecting historic resources that may be subsequently identified; protect any structures on site integral to historic structure; too much discretion to Planning Director in determining method of preservation--coordinate with State Historic Preservation Officer.	The referenced standards for historic resources have been deleted.
7-34C	7-32 - 7-33 Morros visual standards	Grant exemptions to standards only when development not visible from *any public viewpoint* (1a); prohibit ridgetop development where visible from *any* public area (1g); encourage new structures to not be visible from any public areas; do not allow alternative development locations, except to protect sensitive habitats (1d); prohibit land divisions in sensitive areas (1i).	Revisions to standards are being coordinated through a CZLUO amendment package proceeding concurrently with the Area Plan. The Morros Area is identified as an SRA. A Specific Plan for the Morros is currently underway. Exemptions to visual standards are only applicable to projects that aren't visible or consist of small ag accessory structures, or where no feasible site exists or the alternative would be more environmentally damaging. In this case, mitigation is required to reduce impacts to an insignificant level.
7-35C	7-34 1j	Requiring open space in rough proportionality to impacts could inappropriately limit open space; prohibiting public access may preclude prescriptive rights, mitigation of impacts on public access; how does TDC program preserve open space? Require open space to be preserved in perpetuity.	Text regarding rough proportionality has been revised. The commenter is referred to the last paragraph on page 7-7 (See response to 7-3C). If TDC credits sold, site subject to conservation easement.
7-36C	7-34 - 7-36 2,3 Cayucos-Hwy 1 viewshed	See comments on preceding item 34--visual standards for the Morros; include views from the ocean; provide additional standards to protect views of shoreline and ocean from Hwy 1, other public areas; why exempt residential structures < 600 sq. ft. from standard for areas west of Cayucos?	See response to 7-34C. Standards have been amended to include views from the ocean, the Morro Bay Estuary and the shoreline. The exemption regarding residential structures has been stricken.
7-37C	7-39 C1	Allow new recreational uses prior to abandonment of facility to allow continued lateral coastal access and bike path.	Standard applies to AG category inland of Hwy. 1; separate standards (7-37), programs for REC category west of Hwy. 1 provide for recreation, coastal access.
7-38C	7-42 3b(3)	Clarify that objective of site restoration, environmental mitigation is to return site to natural condition that facilitates use for agricultural and recreational purposes.	The revised standard can be found on page 7-33.
7-39C	7-44 REC, A	Why does standard exclude general public access and recreational uses?	This area is developed with private mobilehome and RV park--not appropriate for general public access, but RV Park does provide lower cost recreation.

7-40C	7-45 C	Note that new development must comply with all other applicable LCP requirements.	This is a general rule, as stated on page 7-7, 4th paragraph, 1st sentence.
7-41C	7-46 A	Provide evidence of adequate public services at development review stage; water and sewer evidence should identify specific allocation granted and amount of service capacity remaining.	Text has been revised throughout the document to require evidence of adequate services prior to permit approval; water purveyors and Sanitary District do not grant an allocation; county monitors resource capacities through the Resource Management System.
7-74C	7-46 C	Prohibit condominium hotels, motels if they would replace, convert existing transient occupancy use.	Existing CZLUO standards require a finding of no reduction in availability of accommodations for overnight or transient occupancy by general public compared to conventional hotel, motel (simply prohibiting replacement precludes replacing 10-unit motel with 25-unit condo-motel, for example, that may provide greater availability of accommodations for general public).
7-42C	7-56 A2	Design seawalls to avoid any encroachment onto public beach or sensitive habitat, reference CZLUO 23.05.090.	Text has been revised accordingly on page 4-57 and 7-51.
7-43C	7-63 4c Mixed-use	Specify that parking for residential to be on-site.	Text has been revised accordingly on page 7-58.
7-44C	7-67 C1	Allow coastal access and recreational uses available to general public as principally, rather than non-principally permitted uses.	Text has been revised to move coastal accessways to principally permitted uses, in addition to indoor amusements and recreation, libraries and museums, outdoor sports and recreation, passive recreation; other uses in cultural, education and recreation use group per Table O to remain non-principally permitted uses.
7-45C	7-75 D Maino Property	Re-evaluate allowing residential uses based on lack of water and parks; address habitat, visual impacts from public areas.	Residential development has been substantially reduced on the Maino property, no visitor-serving, commercial; standards to locate development below 80', 20% slope, minimize views from Hwy. 1, North Ocean Ave (locating below 80' elevation will reduce visual impacts from other public areas also). Habitat and visual resources otherwise protected by areawide resource protection standards proposed in the Area Plan.
7-46C	7-77 C, D	Do height standards protect views of shoreline, ocean from Hwy. 1. Ocean Ave., especially in Locarno? will curb, gutter sidewalk waivers interfere with lateral coastal access?	22' height in RMF, 20' in Locarno, is restrictive; Locarno mostly developed; no significant additional visual impacts from Hwy. 1; any development on west side Ocean Ave. will impact views from that street; areas subject to curb, gutter sidewalk waivers not needed to facilitate lateral coastal access.

Responses to Coastal Commission Staff's Specific Comments: Area Wide & Rural (AR)

Comment No.	Page/paragraph in Coastal letter (letter) or 2000 Draft Plan	Coastal Commission Staff Comment	Response
7-1AR	7/9 (letter)	Standard A.1.h: The Final EIR should analyze effectiveness of existing CZLUO clustering provisions with respect to protection of sensitive habitats before method is incorporated into Update.	The Area Plan text has been amended to refer to the applicable CZLUO; the other options require full and permanent protection of identified sensitive features without causing adverse environmental impacts (page 7-11).
7-2AR	7/9 (letter)	Standard A.1.a (1): Proposed language implies SRA and ESHA are only located in areas shown by LCP maps. Clarify on ground resources and add additional language.	The plan has been amended such that unmapped areas are considered ESHA or SRA if resources exist. (Pages 7-11 to 7-12)
7-3AR	7/13 (letter)	Multi-Family and Planned Developments: What are the max. densities/intensities of development?	The MF and PD standards have been deleted.
7-4AR	7/14 (letter)	Concerned with proposal to allow use of sensitive habitat areas as common open space areas.	The MF and PD standards have been deleted.
7-5AR	7/21 (letter)	Areawide Drainage Standards should incorporate more specific requirements for achieving water quality and aquatic habitat protection objectives.	New more comprehensive drainage and water quality standards are included as part of the CZLUO amendment package.
7-6AR	7/29 (letter)	Support Rural Area Circulation Standard and suggest standard further requirements.	This standard has been moved to the CZLUO amendment package and revised to address protection of prime ag soils and sensitive and scenic resources. (Page 9, CZLUO amendment package).
7-7AR	7/20 (letter)	Request that certificate of compliance or parcel map recorded on or after 1973 be referred to commission staff for confirmation that CDP requirements are satisfied.	Concerns regarding certificates of compliance are being partially addressed through Periodic Review. Lot line adjustment standards have been deleted and are being addressed through periodic review.

Responses to Coastal Commission Staff's Specific Draft EIR Comments

Comment Number	Comment	Response
7E-1	Page 5.1-1 of DEIR (2000): Identify Coastal Act Section 30252 as part of regulatory setting and analyze consistency with this section throughout	Text on page 5.1-2 has been amended.
7E-2	Page 5.1-18 of DEIR (2000), Impact TC-1: The commenter requests an analysis of how diminished LOS on South Bay Boulevard will affect coastal access and recreation	Impact discussion TC-1 has been amended to include the requested information.
7E-3	The commenter is concerned about the biological impacts of proposed widening of South Bay Boulevard	Text has been amended on pages 5.8-30 and 35 to clarify that roadways are considered as part of the overall development scenario for the area.
7E-4	The commenter requests analysis of alternatives that would reduce impacts on important recreational corridors and eliminate the need for expansions of roadways which would impact sensitive resources	The section of South Bay Boulevard in question currently operates at a deficient level of service for vehicles. The ability to ameliorate deficient levels of service rests with agencies other than the County (i.e., the City of Morro Bay and Caltrans). Furthermore, the current draft of the Area Plan proposes a buildout that is substantially reduced from previous drafts, in most cases allowing only the minimum necessary to avoid takings law. Former proposals for roadway extensions in sensitive areas (i.e., 3rd Street) have been deleted from the plan. The Sweet Springs/Morro Shores Corridor Alternative includes rerouting of some proposed roadways in order to avoid sensitive resources.
7E-5	Page 5.4-16 (2000 Draft EIR), Regulatory Setting for Water Resource Impacts: The commenter requests identification and analysis of the Updates conformance with Coastal Act Sections 30231, 30241(e), 30250(a), 30254, and 30255	The requested text has been added.

7E-6	Pages 5.4-17 through 5.4-24, Water Resource Impacts and Mitigation Measures (2000 DEIR): The commenter agrees with measures to restrict development until adequate water supplies are available, but requests additional requirements for an overall allocation program that will require water to be used for Coastal Act priority uses prior to residential, general commercial, and industrial use.	Water supplies in Los Osos, assuming successful implementation of conservation methods, would be largely balanced at buildout. This includes priority and other projected uses. The water supply in Cayucos is projected to be deficient in some scenarios, but would be balanced by the Nacimiento project. Policies in the plan require adequate services prior to development approval, and the Resource Management System provides continual monitoring of demand and supply. The County's Coastal Plan policies document includes Policy 8 for Public Works (page 8-8) which specifies that coastal priority uses receive water in accordance with the Coastal Act. The policy specifies that the action should be implemented as a standard. The policy is however, both practically and legally problematic. It may not be legal to allocate water supplies based on a prioritization of uses. The County doesn't control all of the water supplies and water providers may not be able to deny allocations within their service area. Practically, it is difficult for the County to act on projects within required timeframes using a priority system, and it may not be feasible to assess priority as individual projects come forth.
7E-7	The commenter further states that it is not appropriate for the Update to include any increases in buildout potential in the project area due to water shortages.	More conclusive information has been reached regarding water supplies in the Estero Area, and the impacts of additional, planned, water supplies, namely the Nacimiento Water Project. Impacts associated with water supplies as compared with future demand are only significant and unavoidable due to inability of the County to effect conservation measures, which provide a 60 AF/Y reduction in demand in Los Osos, and uncertainties surrounding the Nacimiento Water Project. In general, the update allows the minimum unit number on any property in order to prevent the invocation of takings law; and furthermore requires development to provide evidence of adequate water supplies prior to permit approval.
7E-8	The commenter requests the EIR identify alternative changes in the Area Plan that would balance water supply and demand.	Supply and demand are considered relatively balanced - refer to 7E-7.
7E-9	Refer to above (7E-7)	Refer to response to 7E-7
7E-10	The commenter requests analysis of the update's consistency with the requirements of Sections 30231, 30250, 30254, and 30255 of the Coastal Act (Wastewater).	Section 5.5.1.2 has been amended to include the requested sections. WW-5 has been amended to reference the appropriate sections.
7E-11	The commenter requests more data to back up the conclusion that the Los Osos Sewer project will have a beneficial impact, and that impacts associates with the increased use of septic systems outside the sewer service area be addressed, including water quality and aquatic habitats.	More information (compared to the 2000 Draft EIR) has been included in the discussion preceding WW-4. Additional language regarding septic systems has been added to the discussion on page 5.5-5

7E-12	The commenter requests analysis of the update's consistency with Sections 30220, 30230, 30231, 30232, and 30235 of the Coastal Act regarding drainage and water quality.	Section 5.6.1.2 has been amended to reference the requested sections. DWQ-6 has been added to discuss consistency specifically, although other impact discussions existing in the section discuss similar drainage and water quality issues. Mitigation measures DWQ-3 has been added to reference the appropriate Coastal Act Sections.
7E-13	The commenter requests that the EIR evaluate the proposed standards developed in response to requests for stricter drainage and watershed protection measures, and suggest improvements or alternatives that would better achieve objectives.	Additional standards have been developed as part of the proposed CZLUO amendment package to be considered concurrently with the Area Plan. The proposed language is included in the section on page 5.6-7. Mitigation measure DWQ-3 has been added to recommend adoption and implementation of the proposed language (or equal or better language) whether or not the amendment package goes through.
7E-14	The commenter requests analysis of the update's conformance with Coastal Act Sections 30230, 30231, and 30240 (Biology).	The requested sections have been added to Section 5.8.1.3, and the discussion under impact BR-4 has been amended to include the referenced sections.
7E-15	The commenter requests that the DEIR provide standards and minimum mitigation requirements so that new development will not significantly disrupt sensitive habitats, to the greatest degree feasible, and provide a more detailed assessment of whether the update meets this requirement.	The Area Plan has been substantially revised from the 2000 Draft to provide further policy and program specific development standards for the protection of biological resources. The Plan, in most cases, allows the minimum development necessary to avoid invocation of takings law.
7E-16	The commenter requests that the EIR identify project alternatives where the DEIR doesn't meet the requirement (7E-15).	The EIR includes an alternative aimed at reducing impacts to biological resources on the Morro Shores site.
7E-17	The commenter suggests the EIR consider a mitigation measure that reduces allowable densities in known sensitive habitat areas.	In areas of sensitive habitat, allowable densities have been reduced to, in most cases, the minimum necessary to avoid invocation of takings law, and development in sensitive resource areas is further conditioned in terms of siting, design, habitat protection requirements, etc.
7E-18	The commenter suggests that minimum creek setbacks be only increased based on biological assessment.	BR-2 as shown in the 2000 EIR has been removed due to the inclusion of similar policy language in the proposed Area Plan.
7E-19	The commenter requests mitigation measure BR-9 be revised to ensure that where avoidance of special-status plant habitat cannot be achieved, that an adequate area of equivalent biological type and productivity is restored and/or protected in perpetuity.	BR-8 (formerly BR-9) has been amended as requested. Determination of appropriate mitigation ultimately rests with the applicable jurisdictional agency (i.e., Fish and Wildlife Service or Fish and Game) and would be determined on a case-by-case basis (or through mitigation provided by an HCP).
7E-20	The commenter states that BR-10 should include additional means of avoiding erosion and protecting water quality.	Additional measures to address erosion and water quality are included in the Section 5.6 as part of a proposed CZLUO amendment. BR-10 has been amended to recommend adoption of similar or better language if the amendment is not successful.

7E-21	The commenter requests an analysis of the update's conformance with Coastal Act policies for all areas converted from agricultural land use designations. The commenter refers to prior comment regarding development on, and adjustment of, non-conforming agricultural lots.	The requested information has been added to Section 5.9.
7E-22	The commenter requests the identification of views from public beaches, Morro Bay and the Pacific Ocean as primary viewing corridors, and analyze impacts on those views associated with the plan.	Modeling used for the development of Section 5.10 was based on the Federal Highway model, which assesses views from primary roadways. However, views from beaches are mentioned in the analysis, and are specified in policies and programs contained in the Area Plan. The Plan has been revised to include views from beaches, shoreline and Morro Bay and the estuary in its visual resource protection standards.
7E-23	The commenter asks how the allowable extent of development on the subject parcel(s) was determined?	The section has been clarified as requested.
7E-24	The commenter requests explanation of how the DEIR concluded that the proposed change would not result in changes to type or intensity of development allowed.	See 7E-22.
7E-25	The commenter requests the inclusion of additional standards to mitigate aesthetic impacts on visually prominent areas, including siting, design and lighting standards, and the reduction of allowable intensity.	Additional visual protection standards are in the CZLUO amendment package, and lighting standards exist in the CZLUO (e.g., 23.04.320).
7E-26	The commenter requests that the FEIR evaluate, and suggest mitigation measures for, the visual impacts associated with increased density allowed by the TDC proposal.	Details regarding the TDC proposal are not yet available. The program in the plan only suggests the development of such a program. One of the purposes of the TDC program would be to shift development from visually important sites to less important sites within or adjacent to currently developed areas. The TDC program could therefore act as mitigation for visually sensitive sending sites.
7E-27	(2000 DEIR) The commenter requests a more detailed description of the alternatives, highlighting specific differences from the plan, including alternative standards or land use designations resulting, and the FEIR should include an alternative that seeks to balance public services with development.	The alternatives section has changed substantially from the previous DEIR; the comment is no longer applicable. The Draft Plan generally balances development with public service capacities.

Appendix 1.0 Initial Study/NOP

SAN LUIS OBISPO COUNTY INITIAL STUDY CHECKLIST

Project Title & No. ESTERO AREA PLAN UPDATE: ED93-186

1 = Potentially Significant Impact
2 = Impact Can & Will be Mitigated
3 = Insignificant Impact
4 = Not Applicable

		1	2	3	4
I. BIOLOGICAL RESOURCES					
A.	Wildlife	(X)	( )	( )	( )
B.	Vegetation	(X)	( )	( )	( )
C.	Habitat Area	(X)	( )	( )	( )
D.	Rare and/or Endangered Species	(X)	( )	( )	( )
E.	Unique or Fragile Biotic Community	(X)	( )	( )	( )
F.	State Area of Special Biological Importance	(X)	( )	( )	( )
G.	Riparian/Wetland Area	(X)	( )	( )	( )
II. DRAINAGE, EROSION AND SEDIMENTATION					
A.	Increased Storm Water Runoff	(X)	( )	( )	( )
B.	Erodible Soils/Erosion	(X)	( )	( )	( )
C.	Poorly Drained Soils	(X)	( )	( )	( )
D.	Sedimentation	(X)	( )	( )	( )
E.	Contributes to Existing Drainage Problem	(X)	( )	( )	( )
F.	Alters Existing Drainage Course or Waterway	(X)	( )	( )	( )
G.	Other:_____	( )	( )	( )	( )
III. GEOLOGICAL HAZARDS/SITE ALTERATION					
A.	Landslide Hazard	(X)	( )	( )	( )
B.	Seismic Hazard	(X)	( )	( )	( )
C.	Topographic Alteration; Grading for Building__, Driveways__, Roads__, Other __	(X)	( )	( )	( )
D.	Soil Expansion	(X)	( )	( )	( )
E.	Steep Slopes	(X)	( )	( )	( )
F.	Other:_____	( )	( )	( )	( )
IV. WATER RESOURCES					
A.	Groundwater Quantity	(X)	( )	( )	( )
B.	Groundwater Quality	(X)	( )	( )	( )
C.	Surface Water Quantity	(X)	( )	( )	( )
D.	Surface Water Quality	(X)	( )	( )	( )
E.	Stream Flow Change	(X)	( )	( )	( )
F.	Change to Estuarine Environment	(X)	( )	( )	( )
G.	Other:_____	( )	( )	( )	( )
V. POLLUTION					
A.	Hazardous Materials	( )	( )	(X)	( )
B.	Groundwater Pollution	(X)	( )	( )	( )
C.	Surface Water Pollution	(X)	( )	( )	( )
D.	Increase in Existing Noise Levels	(X)	( )	( )	( )
E.	Exposure of People to Severe Noise Levels	(X)	( )	( )	( )
F.	Substantial Air Emissions	(X)	( )	( )	( )
G.	Deterioration of Ambient Air Quality	(X)	( )	( )	( )
H.	Creation of Objectionable Odors	( )	( )	( )	( )

		1	2	3	4
VI. TRAFFIC					
A.	Increase in Vehicle Trips	(X)	( )	( )	( )
B.	Reduced Levels of Service on Existing Public Roadways	(X)	( )	( )	( )
C.	Limited or Unsafe Access	(X)	( )	( )	( )
D.	Creates Unsafe Conditions on Public Roadways	(X)	( )	( )	( )
E.	Area wide Traffic Circulation	(X)	( )	( )	( )
F.	Internal Traffic Circulation	(X)	( )	( )	( )
G.	Other:_____	( )	( )	( )	( )
VII. PUBLIC SERVICES					
A.	Fire Protection Services	(X)	( )	( )	( )
B.	Police Services	(X)	( )	( )	( )
C.	Schools	(X)	( )	( )	( )
D.	Community Waste Water	(X)	( )	( )	( )
E.	Community Water Supply	(X)	( )	( )	( )
F.	Solid Waste Disposal	(X)	( )	( )	( )
G.	On Site Waste Water	(X)	( )	( )	( )
H.	On Site Water	(X)	( )	( )	( )
I.	Other:_____	( )	( )	( )	( )
VIII. AESTHETIC/CULTURAL RESOURCES					
A.	Visual Impact from Public Roadway	(X)	( )	( )	( )
B.	Increased Light or Glare	(X)	( )	( )	( )
C.	Alters Important Scenic Vista	(X)	( )	( )	( )
D.	Archaeological Resources	(X)	( )	( )	( )
E.	Historic Resources	(X)	( )	( )	( )
F.	Other:_____	( )	( )	( )	( )
IX. HOUSING AND ENERGY					
A.	Creates Substantial Demand for Housing	(X)	( )	( )	( )
B.	Uses Substantial Amount of Fuel or Energy	(X)	( )	( )	( )
C.	Encourages Growth Beyond Resource Capacities	(X)	( )	( )	( )
D.	Other:_____	( )	( )	( )	( )
X. AGRICULTURAL/MINERAL RESOURCES					
A.	Eliminates Valuable Mineral Resources	(X)	( )	( )	( )
B.	Prime Agricultural Soils	(X)	( )	( )	( )
C.	Conflicts with Existing Agricultural Area	(X)	( )	( )	( )
D.	Change from Agriculture to Other Uses	(X)	( )	( )	( )
E.	Reduces Agricultural Capability	(X)	( )	( )	( )
F.	Other:_____	( )	( )	( )	( )
XI. GROWTH INDUCING/CUMULATIVE EFFECTS					
A.	Growth Inducing Effects	(X)	( )	( )	( )
B.	Precedent for Change in Area Land Use	(X)	( )	( )	( )
C.	Cumulative Effects: _____	(X)	( )	( )	( )
	_____	( )	( )	( )	( )
	_____	( )	( )	( )	( )
	_____	( )	( )	( )	( )

Issues identified as potentially significant and to be included in the EIR (includes specifics on how these issues should be addressed)

1. Traffic and Circulation

   a. Traffic analyses will be completed for the alternative proposals (refer to Alternatives section for description).
   b. If not addressed by existing data, road improvements shall be summarized necessary to accommodate development anticipated in the planning area.
   c. Proposed transportation mode alternatives (Transit, park and ride, etc.) shall be summarized to determine if adequate. If mode alternatives are inadequate, recommendations to mitigate will be made.
   e. Mitigation measures necessary to either substantially reduce new traffic to insignificant levels, provide adequate mechanisms to pay for needed improvements, and/or encourage alternative transportation modes will be determined.

2. Aesthetics - Visual and Scenic Resources

   The main view corridors for this planning area are Highway 1, Highway 41, Los Osos Valley Road and South Bay Boulevard. Because of unique location and geography, much of the planning area is visible from these roads. In efforts to preserve the natural scenic qualities found within this planning area, a number of existing and proposed programs and planning standards are proposed.

   a. The EIR will evaluate the adequacy of the existing and proposed development standards that will be applied to new development within the area.
   b. If necessary, identification and discussion of additional mitigation measures to reduce potentially significant adverse visual impacts to a level of insignificance.

3. Water Resources/Wastewater

   Potential short- and long-term impacts to groundwater resources will be identified and evaluated. This section of the EIR is likely to include, but not be limited to the following:

   a. Based on existing information, review and summarize the hydrologic relationship of the groundwater basins with the development proposed in the Estero planning area at buildout. Analysis shall include discussion of other existing or future water sources used in the planning area, such as State or Nacimiento Lake water.
   b. Review draft area plan for adequate measures being proposed for areas with marginal water supplies. Identify potentially significant impacts on water resources.
   c. Discussion of short- and long-term impacts the draft Area Plan may have on the groundwater quality and quantity of the area.
   d. Identification and discussion of feasible mitigation measures, if any, which could be included in the draft Area Plan to minimize potentially adverse groundwater impacts to a level of insignificance.

4. Air Quality

   Potential short- and long-term impacts to air quality will be identified and evaluated. This section of the EIR will include, but not necessarily be limited to, the following:

   a. Summarize the existing and climatic air quality conditions.
   b. Summarize the regulatory setting.

c. Conduct air quality modeling that considers air quality impacts from buildout of the proposed plan. Modeling shall include analysis of impacts relating to construction and operational emissions. The area plan shall be compared to the Air Pollution Control District's 1995 Clean Air Plan (CAP) for consistency of all applicable (with an emphasis on land use) strategies identified in the CAP.
d. Estimate potential cumulative impacts.
e. Identification and discussion of feasible mitigation measures, if any, which could be included in the draft area plan to minimize potentially adverse air quality impacts to a level of insignificance.

5. Noise

Potential short- and long-term impacts from mobile and stationary noise sources will be identified and evaluated. This section of the EIR will include, but not necessarily be limited to, the following:

a. Summarize the existing noise conditions relating to traffic on major roads (i.e., Highways 1 and 41, Los Osos Valley Road and South Bay Boulevard), including other potential noise sources within the planning area.
b. Identification and discussion of the proposed Area Plan's buildout impact to additional traffic noise above what has been considered in the Noise Element.
c. Identification and discussion of the Area Plan's impact to or from loud stationary noise sources.
d. Identification and discussion of feasible mitigation measures, if any, which could be included in the draft plan to minimize potentially adverse noise impacts to a level of insignificance.

6. Biological Resources

The Estero Planning Area includes sensitive habitats, including estuarine and freshwater marshes, riparian, coastal scrub, maritime chaparral, and marine habitats. While the County has not done a detailed survey of all of these habitat areas, the proposed Area Plan does recognize several habitat areas with special "Combining Designation" overlays, such as coastal streams and wetlands and marine resources (i.e., Morro Bay estuary). A biological resources inventory will be prepared and shall include, but not necessarily be limited to, the following:

a. Consultation with the California Department of Fish and Game.
b. Consultation with the California Native Plant Society, the Audobon Society, the Land Conservancy of San Luis Obispo County, and other conservation organizations as appropriate.
c. Identification of rare, threatened and/or endangered plant and animal species within the proposed planning area.
d. Identification of other sensitive, unique or important plant and animal species and communities within the planning area.
e. Preparation of a map showing the locations of the following:

- Habitat for rare, threatened and/or endangered plant and animal species
- Estuarine and freshwater marshes
- Riparian corridors
- Coastal scrub and maritime chaparral
- Marine habitats
- Oak woodland/forest areas
- Other areas of sensitive, unique or important biological resources.

The biological section of the EIR will also include:

f. Identification of short- and long-term impacts on rare, threatened, and/or endangered species and species habitat.
g. Identification of long-term cumulative impacts on the area's ecosystems which could result from the proposed Area Plan.
h. Identification and discussion of feasible mitigation measures (e.g., placing a Sensitive Resource Area combining designation over very sensitive areas) which could be included in the Area Plan, to protect or significantly reduce potentially adverse biological impacts.

7. Public Services

For the following public services, the EIR will 1) summarize the existing conditions, 2) identify and discuss project's impact from additional development for each, and 3) identify and discuss feasible mitigation measures, if any, which could be included in the draft Area Plan to minimize potentially adverse impacts to a level of insignificance:

a. Water Service
b. Community and individual sewage disposal
c. Sheriff Protection
d. Fire Protection
e. Schools
f. Solid Waste Disposal

8. Site-Related Impacts

For the following site-related impacts, the EIR will summarize the existing conditions, and identify and discuss impacts from additional development. The EIR will also identify and discuss feasible mitigation measures, if any, which could be included in the draft Area Plan to minimize potentially adverse impacts to a level of insignificance:

a. Geologic & Seismic Hazards
b. Drainage and Flooding
c. Cultural Resources (records search for the Planning Area)
d. Conversion of and/or conflict with Agriculture
e. Electromagnetic Impacts

9. Combining Designations/Planning Area Standards

An analysis will be completed for those Combining Designation and Planning Area Standards that are proposed for addition, modification, or deletion, which could result in potentially significant adverse impacts. If proposed changes are determined potentially significant, measures will be proposed to mitigate the identified impact to a level of insignificance.

10. Alternatives

The EIR will include discussion and evaluation of project alternatives, including, but not necessarily limited to the following:

a. No Project: This alternative is based on implementation of the existing Area Plan. In Los Osos, the residential buildout is adjusted slightly upward to correspond to the maximum buildout resulting from a combination of land use options in Los Osos and its Focus Areas.

b. No Project: This alternative maintains the existing level of development.

c. Alternative that Emphasizes Environmental Protection and Resource Conservation: The objectives of this alternative generally are to reduce buildout population of the existing-area plan, limit annual growth, maximize conservation of flora and fauna, maximize preservation of agricultural land, protect visually sensitive areas, minimize hillside development, maximize water and energy conservation, and reduce vehicle trips.

d. Alternative that Emphasizes Economic Diversification: The objectives of this alternative generally are to maximize commercial, industrial and other development that improves the local economy, promotes jobs and tourism, improves the jobs/housing balance, and maintains a buildout population that is the same as or less than the existing plan.

11. Cumulative Effects

a. The EIR will address the cumulative effects within each area of analysis.

b. Identification and discussion of all cumulative impacts of the project in relation to other existing and known projects.

c. Identification and discussion of impacts to and from surrounding planning areas for each EIR issue at buildout of the Estero Area Plan.

12. Growth Inducement

The EIR will include an evaluation and discussion of the project's potential growth inducing impacts. The discussion of growth inducing impacts will include, but not necessarily be limited to, the following:

a. Evaluation and discussion of the proposed Plan's potential to foster growth within the planning area.

b. Evaluation and discussion of the proposed Plan's potential to foster growth to adjacent planning areas.

COUNTY OF SAN LUIS OBISPO
DEPARTMENT OF PLANNING & BUILDING
ENVIRONMENTAL DIVISION
NOTICE OF PREPARATION

DATE: MAY 14, 1997

TO:

FROM: Environmental Division, Dept. of Planning & Building County Government Center, Room 310 San Luis Obispo, CA 93408

SUBJECT: NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT

The County of San Luis Obispo will be the Lead Agency and will prepare an Environmental Impact Report (EIR) for the project identified below. We need to know the views of your agency as to the scope and content of the environmental information which is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency will need to use the EIR prepared by our agency when considering your permit or other approval for the project.

PLEASE provide us the following information at your earliest convenience, but not later than the 30 day comment period which began 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 Environmental Impact Report to enable your agency to use this documentation as a basis for your permit issuance or approval?

4. **PERMIT STIPULATIONS/CONDITIONS.** Please provide a list and description of standard stipulations (conditions) which your agency will apply to features of this project. Are there others that have a high likelihood of being applied to a permit or approval for this project? If so, please list and describe.

5. **ALTERNATIVES.** What alternatives does your agency recommend be analyzed in equivalent level of detail with those listed below?

6. **REASONABLY FORESEEABLE PROJECTS, PROGRAMS or PLANS.** Please name any future project, programs or plans that you think may have an overlapping influence with the project as proposed.

7. **RELEVANT INFORMATION.** Please provide references for any available, appropriate documentation you believe may be useful to the county in preparing the Environmental Impact Report.

8. **FURTHER COMMENTS.** Please provide any further comments or information which will help the county to scope the document and determine the appropriate level of environmental assessment.

The project description, location, and the probable environmental effects are contained in the attached materials.

Due to the time limits mandated by State law, your response must be sent at the earliest possible date, but not later that **30 days** after receipt of this notice.

Please send your response to **Nancy E. Rollman, AICP** at the address shown above. We will need the name for a contact person in your agency.

PROJECT TITLE: ESTERO AREA PLAN UPDATE

PROJECT APPLICANT: County Planning and Building Department, San Luis Obispo, CA

Responses due by: JUNE 16, 1997

Signature Nancy E. Rollman

Environmental Specialist

Telephone: (805) 781-5600

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

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COUNTY OF SAN LUIS OBISPO
NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT FOR THE
ESTERO AREA PLAN UPDATE; ED93-186

PROJECT DESCRIPTION

The Department of Planning and Building Department is in the process of preparing the draft Estero Area Plan update. The purpose of the update is to recognize changed conditions, accommodate any change in direction needed for the planning area, and bring relevant data up to current levels of accuracy.

ORGANIZATION

The Estero Area Plan update is divided into the following study areas:

Part 1 - the community of Cayucos;
Part 2 - the community of Los Osos and identified "Focus Areas" within the community;
Part 3 - "Rural" areas within the Estero Planning Area;
Part 4 - A "Secondary Study Area" consisting of the remaining portion of the Morro Bay watershed (outside of the coastal zone and Estero Area Plan); and,
Part 5 - A "Secondary Study Area" called the "Cayucos Fringe," which includes rural areas in the watersheds above Cayucos within the Adelaida Planning Area.

The proposed project to be analyzed in the Area Plan Update EIR is known as the "Preliminary Consensus Plan." The following alternatives will be examined:

1. Existing Plan Alternative
2. Existing Development Alternative
3. Economic Diversification Plan Alternative: This alternative is a set of land use proposals that emphasize economic diversification.
4. Environmental Plan Alternative: This alternative is a set of land use proposals that emphasize environmental protection and resource conservation.

PROJECT LOCATION

The Estero Planning Area encompasses the central coastal area of San Luis Obispo County from Point Estero on the north to Point Buchon on the south, and from the coast, inland to Los Padres National Forest. Three identified urban areas include the City of Morro Bay, and the unincorporated communities of Cayucos and Los Osos. The planning area, including the City of Morro Bay, occupies roughly 45,700 acres or approximately 71.5 square miles (although the plan update only includes the unincorporated areas). The majority of the area outside of the urban communities is rolling countryside largely devoted to grazing, while the level valley areas of Los Osos, Morro and Chorro Creeks are devoted to more intensive agricultural uses.

The Morro Bay watershed will be considered in its entirety with the Estero Area plan update. The approximate 17,400-acre (or approximately 27 square mile) portion of the watershed that is outside the Estero Planning Area will be considered as another "secondary study area." In addition, a "secondary study area" called the "Cayucos Fringe," which includes rural areas in the watersheds above Cayucos within the Adelaida Planning Area will, be considered with the Area Plan update.

TEXT AND MAP CHANGES

A number of text and mapping changes will be are proposed, including the following:

A. Add new goals and objectives for land use planning and circulation.
B. Complete update of census statistics, figures, land use acreage, and other data.
C. Correction of mistakes and ambiguities, other minor reorganization of text.
D. Clarification, reorganization, revision and addition of goals, policies, programs, and standards for land use planning and circulation.
E. Projections of housing and population growth.
F. Review and revision of programs and standards that function as mitigating measures for growth anticipated by the plan.
G. Update of resource management data for water, sewage disposal, schools, and air quality.
H. A variety of changes to land use categories (zones), combining designations, proposed public facilities, street classifications, future vehicular and non-vehicular access, and circulation patterns.

DESCRIPTION OF PRELIMINARY CONSENSUS PLAN

A set of proposed changes to the text and maps of the existing Estero Area Plan, as well as changes to the Adelaida and San Luis Obispo Area Plans that include the following:

- Standards that offer a variety of development options to preserve contiguous areas of environmentally sensitive habitat
- Policies, programs and standards to protect and enhance the Morro Bay Estuary and its watershed
- Standards that offer incentives for development of mixed uses (e.g. commercial and residential), especially in central business districts, and senior citizen housing
- Standards for development and design of multi-family, "common interest," and other residential development
- Standards for processing and design of lot line adjustment applications
- Programs to encourage water and energy conservation and graywater reclamation
- Standards that require referral of certain development applications within an identified "planning impact area" to the City of Morro Bay for review and comment
- Programs to limit annual residential growth in Los Osos and Cayucos

In and Near Los Osos:

- Reduction of the estimated future population at buildout to about 22,500 persons, while slightly increasing opportunities for multi-family housing
- A policy that prevents further expansion of the urban reserve line
- Policies, programs and standards to establish a greenbelt and conserve habitat. Examples include establishment of a community-based Transfer of Development Credits Program, and reduction of residential densities in hillside areas
- Standards that set **minimum** residential densities in certain multi-family land use categories
- Standards that allow development of a multi-use, employment-generating business park in a central area of the community
- Standards that establish design criteria for the central business district and the Baywood commercial area
- Revisions to the existing Interim Service Capacity Allocation (ISCA) standard

In and Near Cayucos:

- A minor increase in the estimated future population at buildout to about 5,500 persons
- Generally no expansion of the existing urban reserve line
- A land use category change (rezoning) and disestablishment of an agricultural preserve that enables commercial, tourist-oriented, and residential development on an approximately 10-acre property in the west end of the community
- Standards that enable mixed residential and office use along Cayucos Drive, while assuring development that is compatible with the existing elementary school
- Establishment of a Sensitive Resource Area (SRA) combining designation (overlay zone) to protect views from Highway 1 and public beaches to the first prominent ridgeline in rural areas (including the Adelaida Planning Area) between the City of Morro Bay and the northern planning area boundary
- Standards that limit expansion of industrial and related facilities on the Estero Marine Terminal and the surrounding Chevron ownership between the City of Morro Bay and Cayucos

PROJECT BACKGROUND

In 1980, the County of San Luis Obispo adopted its present land use policies, known as the Land Use Ordinance (LUO) and Land Use Element (LUE). The Estero Area Plan is one of 15 area plans (11 inland and 4 coastal) that make up the County Land Use Element, Circulation Element, and Local Coastal Program (LCP). The LUE calls for periodic updates for each of these area plans. This proposed update will be the first for this area plan since it was prepared in the early 1980's.

In 1988, the County adopted its present coastal land use policies and regulations, known as the LCP. The LCP is fully certified by the California Coastal Commission, and the county is authorized to process most coastal development permits. The program includes four Area Plans, Coastal Zone Framework for Planning, Coastal Zone Policy Document, and the Coastal Zone Land Use Ordinance (CZLUO). The Estero Area Plan is one of the four coastal Area Plans. County policy and the California Coastal Act calls out the need for periodic updates (every 5 years) of each area plan.

If you have questions or need more information about the **EIR process**, please contact:

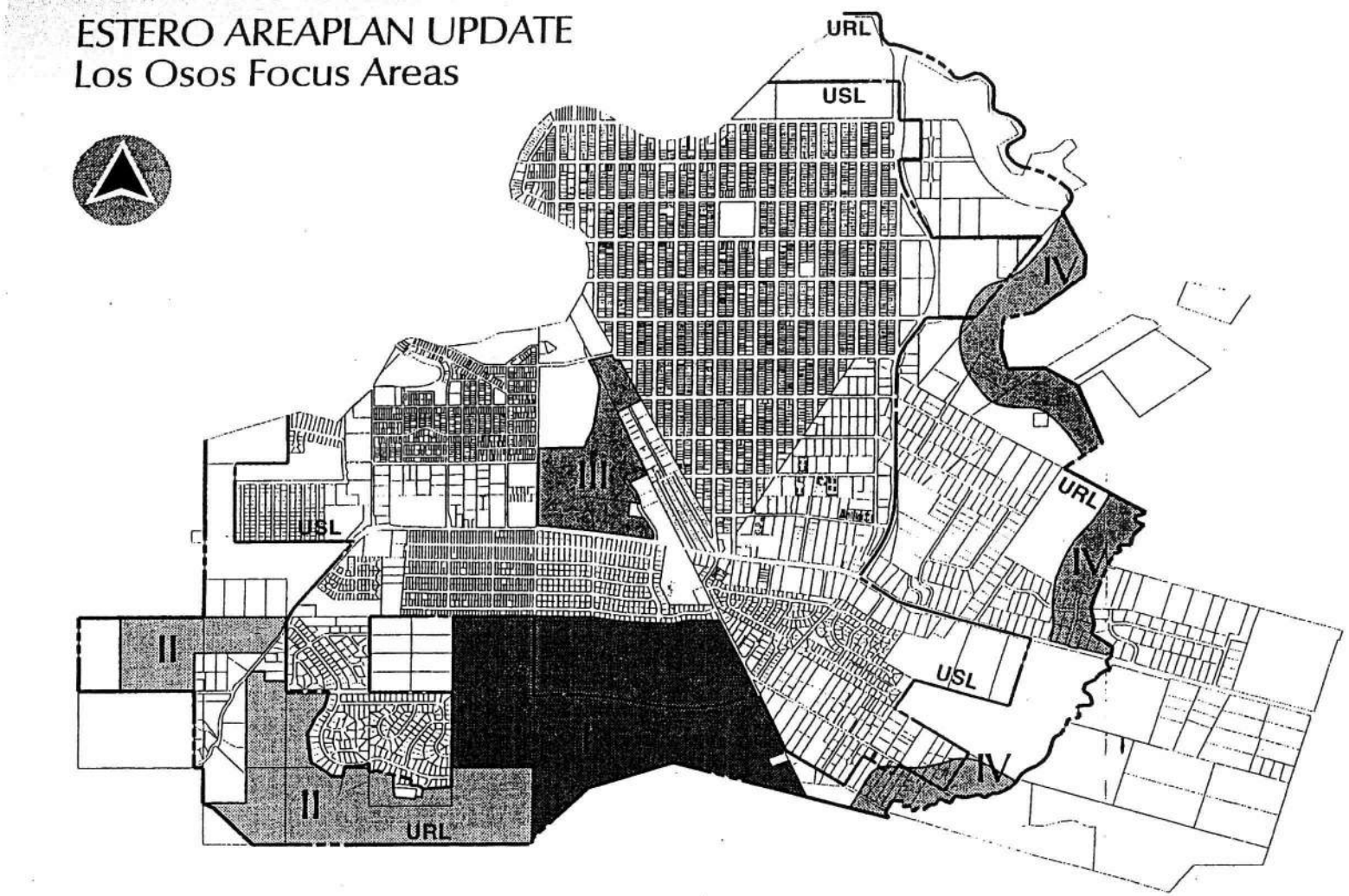
Nancy Rollman, Environmental Specialist
Department of Planning and Building, Rm. 310
County Government Center
San Luis Obispo, CA 93408
805/781-5600

If you have questions or need more information about the **Area Plan Update**, please contact:

Mike Wulkan, Project Manager
Department of Planning and Building, Rm. 310
County Government Center
San Luis Obispo, CA 93408
805/781-5608

Figure 1
Estero Planning Areas & Secondary Study Areas


* CAYUCOS FRINGE STUDY AREA
ADELAIDA
Cayucos URL
ESTERO BAY
RURAL ESTERO
ESTERO
MORRO BAY
MORRO BAY
Los Osos URL
BAYWOOD PARK
LOS OSOS
SCALE
SALINAS RIVER
Other Watershed
SAN LUIS BAY (INLAND)
SAN LUIS BAY COASTAL
SUNSET PALISADES
SHELL BEACH
PISMO BEACH
PORT SAN LUIS
HILLS
CANADA DE LOS OSOS
MONTAÑA DE ORO STATE PARK
MORRO BAY STATE PARK
FOREST LAWN
CALIF. MEN'S COLONY
CUESTA COLLEGE
RANCHO SAN LUISITO
SAN LUISITO CREEK RD
Morro Rock
Morro Creek
Los Osos Creek
Los Osos Valley Rd
Turri Road
Warren Lake
Broderson Lake
Stenner Pk.
Stenner Peak
Scenic Drive
Pecho Valley Rd
Pecho Rock
Irish Hills
Bishop Peak
Cerro San Luis
Cerro Alto
Cerro Alto Loop
Davis Gap
Alexander Lake
Old Mission
Eagle Peak
Mission Rock
Point Buchon
Cayucos Point
Cayucos Pier
Cayucos Harbor
Cayucos Pt.
Cayucos Fire Station
Cayucos Pier
Cayucos Creek
Cayucos Beach


ESTERO AREAPLAN UPDATE
Los Osos Focus Areas
URL
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State of California

GOVERNOR'S OFFICE OF PLANNING AND RESEARCH

1400 TENTH STREET
SACRAMENTO 95814

PETE WILSON
GOVERNOR

LEE GRISSOM
DIRECTOR

RECEIVED
MAY 27 1997
S.L.O. COUNTY
PLANNING DEPT.

DATE: May 20, 1997

TO: Reviewing Agencies

RE: ESTERO AREA PLAN UPDATE
SCH# 97051059

Attached for your comment is the Notice of Preparation for the ESTERO AREA PLAN UPDATE draft Environmental Impact Report (EIR).

Responsible agencies must transmit their concerns and 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 this notice. We encourage commenting agencies to respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

NANCY ROLLMAN
THE COUNTY OF SAN LUIS OBISPO
COUNTY GOVERNMENT CENTER
ROOM 310
SAN LUIS OBISPO, CA 93408

with a copy to 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 review process, call at (916) 445-0613.

Sincerely,

ANTERO A. RIVASPLATA
Chief, State Clearinghouse

Attachments

cc: Lead Agency

NOP Distribution List

SCH# 97051059

S = sent by lead agency
X = sent by SCH

Resources Agency

- [X] **Nadell Gayou** — *Resources Agency*, 1020 Ninth Street, Third Floor, Sacramento, CA 95814, 916/327-1722 Fax 916/327-1648
- [ ] **Nicole Leiria** — *Dept. of Boating & Waterways*, 1629 S Street, Sacramento, CA 95814, 916/445-6281 916/327-7250
- [X] **Elizabeth A. Fuchs** — *California Coastal Commission*, 45 Fremont Street, Suite 1970, San Francisco, CA 94105-2219, 415/904-5200 Fax 415/904-5400
- [ ] **Reed Holderman** — *State Coastal Conservancy*, 1330 Broadway, Suite 1100, Oakland, CA 94612, 510/286-1015 Fax 510/186-0470
- [ ] **Keren Yowell** — *Dept. of Conservation*, 801 K Street, MS-24-01, Sacramento, CA 95814, 916/445-8733 Fax 916/324-0948
- [X] **Dale Wierman** — *Dept. of Forestry*, 1416 Ninth Street, Room 1516-2, Sacramento, CA 95814, 916/653-9451 Fax 916/653-0989
- [ ] **Hans Kreutzberg** — *Office of Historic Preservation*, P.O. Box 942896, Sacramento, CA 94296-0001, 916/653-9107 Fax 916/653-9824
- [ ] **Environmental Review** — *Dept. of Parks and Recreation*, P.O. Box 942896, Sacramento, CA 94296-0001, 916/653-0538
- [ ] **Environmental Review** — *Reclamation Board*, 1416 Ninth Street, Room 1623, Sacramento, CA 95814, 916/327-1531 Fax 916/327-1600
- [ ] **Steve McAdam** — *S.F. Bay Conservation & Dev't. Comm.*, 30 Van Ness Avenue, Room 2011, San Francisco, CA 94102, 415/557-3686 Fax 415/557-3767
- [X] **Nadell Gayou** — *Department of Water Resources*, 1020 Ninth Street, Third Floor, Sacramento, CA 95814, 916/327-1722 Fax 916/327-1648

Health & Welfare

- [ ] **Kim Dinh** — *Dept. of Health*, 601 N. 7th Street, PO Box 942732, Sacramento, CA 94234-7320, 916/323-6111 Fax 916/327-6092

Fish and Game - *Regional Offices*

- [ ] **Richard L. Elliott**, Regional Manager, Department of Fish and Game, 601 Locust, Redding, CA 96001, 916/225-2363 Fax 916/225-2381
- [ ] **Ryan Broddrick**, Regional Manager, Department of Fish & Game, 1701 Nimbus Road, Suite A, Rancho Cordova, CA 95670, 916/358-2900 Fax 916/358-2912
- [X] **Brian Hunter**, Regional Manager, Department of Fish and Game, P.O. Box 47, Yountville, CA 94599, 707/944-5518 Fax 707/944-5563
- [ ] **George Nokes**, Regional Manager, Department of Fish and Game, 1234 East Shaw Avenue, Fresno, CA 93710, 209/445-6152 Fax 209/445-6607
- [ ] **Department of Fish and Game** — *Environmental Services*, 330 Golden Shore, Suite 50, Long Beach, CA 90802, 310/590-5132 Fax 310/590-5192

Independent Commission/Agencies

- [ ] **California Energy Commission**, 1516 Ninth Street, MS-15, Sacramento, CA 95814, 916/654-3944
- [ ] **Native American Heritage Comm.**, 915 Capitol Mall, Room 364, Sacramento, CA 95814, 916/653-4082 Fax 916/657-5390
- [ ] **Martha Sullivan** — *Public Utilities Commission*, 505 Van Ness Avenue, San Francisco, CA 94102, 415/703-2011 Fax 415/703-1965
- [X] **Betty Silva** — *State Lands Commission*, 100 Howe Avenue, Suite 100-S, Sacramento, CA 95826, 916/574-1872 Fax 916/574-1885
- [ ] **Gerald R. Zimmerman** — *Colorado River Board*, 770 Fairmont Avenue, Suite 100, Glendale, CA 91203-1035, 818/543-4676 Fax 818/543-543-4685
- [ ] **Tahoe Regional Planning** — *Environmental Review*, P.O. Box 1038, Zephyr Cove, NV 89448, 702/588-4547 Fax 702/588-4527
- [ ] **Thomas Ottoman** — *Office of Emergency Services*, P.O. Box 29998, San Francisco, CA 94129, 415/666-9300
- [ ] **Debby Eddy** — *Delta Protection Commission*, P.O. Box 530, Walnut Grove, CA 95690, 916/776-2290 FAX 776-2293

Department of Transportation
District Contacts

- [ ] **Linda Evans** — *Caltrans, District 1*, 1656 Union Street, Eureka, CA 95501, 707/445-6412 Fax 707/445-5869
- [ ] **Local Development Review** — *Caltrans, District 2*, P.O. Box 496073, Redding, CA 96049-6073, 916/225-3133 Fax 916/225-3146
- [ ] **Jeff Pulverman** — *Caltrans, District 3*, 703 B Street, Marysville, CA 95901, 916/327-3859 Fax 916/323-7669
- [ ] **Phillip Badal** — *Caltrans, District 4*, P.O. Box 23660, Oakland, CA 94623-0660, 510/286-5578 Fax 510/286-5513
- [X] **Lawrence Newland** — *Caltrans, District 5*, P.O. Box 8114, San Luis Obispo, CA 93403-8114, 805/549-3683 Fax 805/549-3077
- [ ] **Marc Birnbaum** — *Caltrans, District 6*, P.O. Box 12616, Fresno, CA 93778-2616, 209/448-4088 Fax 209/488-4101
- [ ] **Stephen J. Boswell** — *Caltrans, District 7*, 120 South Spring Street, Los Angeles, CA 90012, 213/897-4429 Fax 213/897-4358
- [ ] **Harvey Sawyer** — *Caltrans, District 8*, P.O. Box 231, San Bernardino, CA 92402, 909/383-4808 Fax 909/383-7934
- [ ] **Robert Rahnke** — *Caltrans, District 9*, 500 South Main Street, Bishop, CA 93514, 619/872-0689 Fax 619/872-0678
- [ ] **Dana Cowell** — *Caltrans, District 10*, P.O. Box 2048, Stockton, CA 95201, 209/948-7906 Fax 209/948-7906
- [ ] **Lou Salazar** — *Caltrans, District 11*, P.O. Box 85406, M.S. 5e, 2829 Juan Street, San Diego, CA 92186-5406, 619/688-6002 Fax 619/688-2591
- [ ] **Aileen Kennedy** — *Caltrans, District 12*, 2501 Pullman St., Santa Ana, CA 92705, 714/724-2239 Fax 714/724-2592

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- [ ] **Sandy Hesnard** — *Caltrans - Division of Aeronautics*, P.O. Box 942874, Sacramento, CA 94274-0001, 916/324-1833 Fax 916/327-9093
- [ ] **Alice Huffaker** — *California Highway Patrol*, Office of Special Projects, Planning and Analysis Division, 2555 1st Ave., Sacramento, CA 95818, 916/657-7222 Fax 916/452-3151
- [ ] **Ron Helgeson** — *Caltrans - Planning*, P.O. Box 942874, Sacramento, CA 94274-0001, 916/653-9966 Fax 916/653-0001

State and Consumer Services

- [ ] **Robert Sleppy** — *Dept. of General Services*, 400 R Street, Suite 5100, Sacramento, CA 95814, 916/324-0214 Fax 916/322-3987
- [ ] **Office of Local Assistance**, 501 J Street, Suite 400, Sacramento, CA 95814, 916/445-3160

California Environmental Protection Agency

- [ ] **Mike Tollstrup** — *Air Resources Board*, 2020 L Street, Sacramento, CA 95815, 916/322-8267 Fax 916/322-5982
- [ ] **Mark deBie** — *Calif. Waste Management Board*, 8800 Cal Center Drive, Sacramento, CA 95826, 916/255-4164 Fax 916/255-4071
- [ ] **Wayne Hubbard** — *State Water Resources Control Board*, *Division of Clean Water Programs*, P.O. Box 944212, Sacramento, CA 94244-2120, 916/227-4408 Fax 916/227-4549
- [ ] **Phil Zentner** — *State Water Resources Control Board*, *Division of Water Quality*, P.O. Box 944213, Sacramento, CA 94244-2130, 916/657-0912 Fax 916/657-2388
- [ ] **Mike Falkenstein** — *State Water Resources Control Board*, *Division of Water Rights*, 901 P Street, 3rd Floor, Sacramento, CA 95814, 916/657-1377 Fax 916/657-1485
- [ ] **Dept. of Toxic Substances Control** — *CEQA Tracking Center*, 400 P Street, Fourth Floor, P.O. Box 806, Sacramento, CA 95812-0806, 916/324-3119 Fax 916/324-1788

Regional Water Quality Control Board

- [ ] **NORTH COAST REGION (1)**, 5550 Skyline Blvd., Suite A, Santa Rosa, CA 95403, 707/576-2220 Fax 707/523-0135
- [ ] **SAN FRANCISCO BAY REGION (2)**, 2101 Webster, Suite 500, Oakland, CA 94612, 510/286-1255 Fax 510/286-1380
- [X] **CENTRAL COAST REGION (3)**, 81 Higuera Street, Suite 200, San Luis Obispo, CA 93401-5427, 805/549-3147 Fax 805/543-0397
- [ ] **LOS ANGELES REGION (4)**, 101 Centre Plaza Drive, Monterey Park, CA 91754-2156, 213/266-7556 Fax 213/266-7600
- [ ] **CENTRAL VALLEY REGION (5)**, 3443 Routier Road, Suite A, Sacramento, CA 95827-3098, 916/255-3000 Fax 916/255-3015
  - ○ **Fresno Branch Office**, 3614 East Ashlan Avenue, Fresno, CA 93726, 209/445-5116 Fax 209/445-5910
  - ○ **Redding Branch Office**, 415 Knollcrest Drive, Redding, CA 96002, 916/224-4845 Fax 916/224-4857
- [ ] **LAHONTAN REGION (6)**, 2501 Lake Tahoe Boulevard, South Lake Tahoe, CA 96150, 916/542-5400 Fax 916/544-2271
  - ○ **Victorville Branch Office**, 15428 Civic Drive, Suite 100, Victorville, CA 92392-2359, 619/241-6583 Fax 619/241-7308
- [ ] **COLORADO RIVER BASIN REGION (7)**, 73720 Fred Waring Drive, #100, Palm Desert, CA 92260-2564, 619/346-7491 Fax 619/341-6820
- [ ] **SANTA ANA REGION (8)**, 3737 Main Street, Suite 500, Riverside, CA 92501-3339, 714/782-4130 Fax 909/781-6288
- [ ] **SAN DIEGO REGION (9)**, 9771 Clairemont Mesa Blvd., Suite B, San Diego, CA 92124-1331, 619/467-2952 Fax 619/571-6972

- [X] OTHER: Haus. '97/ Dev
- [ ] OTHER: _____

SCH 2/4/97

CDF / SLO COUNTY FIRE DEPARTMENT

General Information 805/543-4244

24 HR. FAX 805/543-6909

635 N. SANTA ROSA • SAN LUIS OBISPO • CALIFORNIA 93405

June 16, 1997

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SLO COUNTY PLANNING DEPT

Ms. Nancy Rollman, Environmental Specialist
Department of Planning and Building, Rm. 310
County Government Center
San Luis Obispo, CA 93408

SUBJECT: EIR for the Estero Area Plan

Dear Ms. Rollman:

The following is in response to the notice of preparation of an Environmental Impact Report (EIR) for the Estero Area Plan.

Name of Contact Person:

Tim Eckles or Ben Stewart
CDF/San Luis Obispo County Fire Dept.
635 N. Santa Rosa St.
San Luis Obispo, CA 93405
(805)543-4244

Permits or Authority:

Fire Safety Plan conditioning of development under the authority of 1994 Uniform Fire Code and County Land Use Ordinance.

Environmental Information:

Access road and area circulation;
Water system, private (on-site) or community;
Fuel Modification

Permit Conditions:

Setbacks
Roof covering
Fire Flow
Water Storage
Roads and Access
Vegetation Clearance

Alternatives:

County Fire response times into some of the area of the EIR exceeds 15 minutes.

Consider annexation into the local fire district or construction of a new County Fire Station.

If I can provide additional information or assistance, please call 543-4244, ext. 2122. My office hours are Sunday - Wednesday 8:00 to 5:00.

Sincerely,

Tim Eckles
Fire Captain

iad
cc: Mike Harkness, Battalion Chief
Mike Wulkan, SLO County Planning

STATE OF CALIFORNIA — PETE WILSON, *Governor*

CALIFORNIA STATE LANDS COMMISSION
100 Howe Avenue, Suite 100 South
Sacramento, CA 95825-8202

ROBERT C. HIGHT, *Executive Officer*
(916) 574-1800 FAX (916) 574-1810
California Relay Service From TDD Phone **1-800-735-2922**
from Voice Phone **1-800-735-2929**

Contact Phone: (916) 574-1833
Contact FAX: (916) 574-1925

June 13, 1997

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JUN 17 1997
S.L.O. COUNTY
PLANNING DEPT.

File Ref: SCH 97051045

Nancy E. Rollman
San Luis Obispo County
County Government Center Room 310
San Luis Obispo, California 93408

Dear Ms. Rollman:

Staff of the California State Lands Commission (SLC) has reviewed the Notice of Preparation (NOP), Estero Area Plan Update EIR; ED 93-186, SCH 97051045. Based on this review we offer the following comments.

The SLC has jurisdiction over all State-owned filled and unfilled tidelands, submerged lands and beds of navigable waterways. The State acquired ownership of all such lands within its boundaries upon its admission to the United States in 1850. The State holds these lands for the benefit of all the people of the State for statewide Public Trust purposes which include waterborne commerce, navigation, fisheries, water-related recreation, habitat preservation, and open space.

The SLC should be consulted regarding any specific uses proposed for or which may impact such lands. Inquiries may be submitted to the State Lands Commission, Barbara Dugal, 100 Howe Avenue, Suite 100 South, Sacramento, California 95825, telephone (916) 574-1833.

Sincerely,

John B. Lein
FOR
MARY GRIGGS
Environmental Services Section
Division of Environmental
Planning and Management

cc: Barbara Dugal
John Lein

COUNTY OF SAN LUIS OBISPO
Department of General Services
COUNTY GOVERNMENT CENTER • SAN LUIS OBISPO, CALIFORNIA 93408 • (805) 781-5200
DUANE P. LEIB, DIRECTOR

TO: Nancy Rollman, Environmental Specialist

FROM: Sandra Zaida, Park Planner

DATE: June 16, 1997

SUBJECT: **Response to Notice of Preparation of an EIR for the Estero Area Plan Update (ED93-186)**

The following information was requested:

1. Name of Contact Person:
   Sandra Zaida, Park Planner (805) 781-5930
   1035 Palm Street, Room 460
   San Luis Obispo, CA 93408

2. Permit(s) or Approval(s) Authority: None

3. Environmental Information:
   We request that an analysis be done on the effects this plan would have on park facilities (active recreation) within the area. Providing parks is a public service and yet this was not identified on the Initial Study Checklist.

4. Permit Stipulations/Conditions: None.

5. Alternatives: None.

6. Reasonably Foreseeable Projects, Programs or Plans:
   At the direction of the Board of Supervisors the Parks Division in conjunction with Advance Planning and a Citizens Advisory Committee is in the process of creating a Specific Plan for the Morros study area (from South Bay Boulevard east to Foothill Boulevard, and from Los Osos Valley Road north to Highway 1. The completion of a draft plan is scheduled for 1997, however, review and adoption of this plan by the Board of Supervisors are not expected to occur until late 1998.

7. Relevant Information:
   Draft Parks and Recreation Element of the County General Plan (August, 1996).

8. Further Comments:
   Please continue to keep us informed of the progress and contact us with any questions. Thank you for the opportunity to comment.

SAN LUIS OBISPO COUNTY ENGINEERING DEPARTMENT

COUNTY GOVERNMENT CENTER • ROOM 207 • SAN LUIS OBISPO, CALIFORNIA 93408

PHONE (805) 781-5252 • FAX (805) 781-1229

TIMOTHY P. NANSON
COUNTY ENGINEER
GLEN L. PRIDDY
DEPUTY COUNTY ENGINEER
ENGINEERING SERVICES
NOEL KING
DEPUTY COUNTY ENGINEER
ADMINISTRATION

ROADS
SOLID WASTE
FRANCHISE ADMINISTRATION
WATER RESOURCES
COUNTY SURVEYOR
SPECIAL DISTRICTS

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JUN 16 1997

S.L.O. COUNTY
PLANNING DEPT.

June 13, 1997

MEMORANDUM

TO: Nancy Rollman, Environmental Specialist

FROM: Richard Marshall, Development Services Engineer REM

SUBJECT: Estero Area Plan Update EIR

Thank you for the opportunity to provide information on the Notice of Preparation for the subject report. Following is the information requested:

1. Contact: Richard Marshall
   County Engineering Department
   County Government Center, Room 207 - SLO CA 93408
   (805) 781-5280

2. Authority: County Engineering will review impacts associated with drainage, water resources, public services and traffic circulation.

3. Environmental Information: The South Bay area has a history of drainage and groundwater quality concerns, which appear to be adequately addressed in the NOP.

4. Permit conditions: Standard conditions of approval of future projects permitted under the proposed Area Plan will include drainage retention and connection to the community-wide sewer system within most of the South Bay area; and street improvements as applicable throughout the area.

5. Alternatives: The distinction between alternatives (a) and (b) listed in the NOP could be clarified. Does (a) mean development under the existing Area Plan, except with some changes? If so, why is it called No Project? Does (b) mean development under the existing Area Plan as is, or no additional development at all?

6. Foreseeable projects: The County will be constructing a community-wide sewer in the South Bay area in the near future. No drainage or transportation improvement projects are currently programmed.

7. Relevant Information: Please refer to the South Bay Circulation Study, County Bikeways Plan, and Preliminary Engineering Evaluation - Los Osos/Baywood Park Community Drainage Project.

8. Comments: No further comments.

File: Surveyors General Correspondence

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STATE OF CALIFORNIA - THE RESOURCES AGENCY

PETE WILSON, Governor

DEPARTMENT OF FISH AND GAME
POST OFFICE BOX 47
YOUNTVILLE, CALIFORNIA 94599
(707) 944-5500

June 13, 1997

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JUN 16 1997

S.L.O. COUNTY
PLANNING DEPT.

Ms. Nancy Rollman
County of San Luis Obispo
County Government Center, Room 310
San Luis Obispo, California 93408

Dear Ms. Rollman

Notice of Preparation (NOP)
Estero Area Plan Update, ED93-186
SCH # 97051045, San Luis Obispo County

Department of Fish and Game personnel thank you for the opportunity to review and provide comments on the Notice of Preparation for this project, an update of the Estero Area General Plan. After reviewing the material submitted, we have the following comments.

The Draft Environmental Impact Report (DEIR) should contain a complete description and map of the habitats in the planning area, including acreages of each habitat type. Impacts to these habitats, and mitigation measures necessary to offset those impacts, should be identified and discussed. The Department recommends mitigation for all habitats, including grasslands. Grasslands and scrub are often developed without mitigation leading to unaddressed cumulative loss of wildlife habitat.

Wildlife species (including fish, invertebrates, reptiles and amphibians) present or otherwise dependent upon impacted habitats during all or part of the species' life cycle should be identified. Wildlife habitat should be clearly and accurately mapped and any State- or Federally-listed threatened or endangered species, including candidate species or those species which otherwise meet the criteria for listing and Species of Special Concern should be identified and discussed. Impacts to these species should be evaluated and mitigation proposed which will avoid or reduce significant impacts to all wildlife species and habitats. Potential short- and long-term (cumulative) impacts to these wildlife species and to their required habitats should be fully discussed.

The California Natural Diversity Data Base should be consulted to identify any Species of Special Concern, sensitive, candidate, rare, threatened or endangered plant species which may be directly or indirectly impacted by potential projects. Within the San Luis Obispo County area there are many species that fall into one of these categories. In addition, a qualified botanist should conduct thorough field surveys at appropriate seasons to document the presence or absence of sensitive species and to accurately map all vegetative communities present within the project area.

Several sensitive habitat types (e.g., oak woodlands or savannas, wetlands, riparian, and habitats for rare, threatened or endangered species) exist within the proposed study area. All of these should be carefully evaluated with the goal of avoiding impacts to these habitats. Species dependent on these sensitive habitat types should be identified, and potential short- and long-term (cumulative) impacts to the species, their required habitats and to the sensitive habitat types should be fully discussed. Appropriate measures to prevent further degradation and loss of these species and habitat types should be developed and implemented as conditions of approval for this project. We recommend that impacts to rare plant and animal nabitats be avoided or minimized by reducing or relocating the project away from these areas. Relocation of rare plants is not a mitigation option.

Analysis of impacts to wide ranging species should include the loss of breeding and foraging habitat over the entire planning area, habitat fragmentation, and cumulative impacts. The DEIR should include a map showing any open space areas. Areas to be retained as open space should not be completely encircled by development as this decreases the value of the area for wildlife. We recommend open space areas be connected by corridors to permit wildlife passage between the areas.

Survey results and specific mitigation measures must be included in the document. Surveys to be conducted later or mitigation measures to be identified later are not acceptable. Court rulings state that such studies and mitigation measures would be improperly exempted from the process of public and governmental scrutiny which is required under the California Environmental Quality Act (CEQA). A document that requests future studies or future identification of mitigation will be considered inadequate.

Department policy states that a project should cause no net loss of either wetland acreage or wetland habitat value. We recommend impacts to creeks and rivers be avoided where possible. Impacts would include, but are not limited to, road crossings, culverts, channelization and rip-rap. If improvements to the waterways must be made for reasons of public health and safety, retention basins would be preferable to channelization of the entire stream. In areas, which must be channelized, we recommend the channel be oversized to allow for vegetation along both banks. Unavoidable impacts should be identified and mitigation provided for in the document. Mitigation for lost wetlands or creeks must include the creation of new wetlands on at least a 1:1 basis. Higher value wetlands will require higher ratios for compensation. Areas proposed as wetland mitigation sites must be identified specifically in the document. Riparian vegetation removed should be replaced on a 3:1 in-kind basis using native species.

The Department recommends a minimum 100-foot buffer be established to protect streams and wetlands and their associated vegetation, and to provide a travel corridor for wildlife. The buffer should be measured outward from the top of each streambank or from the edge of any wetland. In the case of riparian vegetation along stream courses, the setback should be measured outward from the development side of the vegetative canopy. No roads or structures should be permitted within the buffer. Pedestrian trails should be located along the outside edge of the riparian vegetation.

Potential impacts caused by water quality changes due to grading, increased storm water runoff, hydrocarbons and sediments from streets and parking lots, potential oil spills, fertilizer, herbicide and pesticide applications, must all be discussed. Potential changes in groundwater availability and the changes that may occur to the creeks within the project site must be carefully evaluated.

California Environmental Quality Act (CEQA) guidelines (Section 15126d) state that discussion of alternatives shall focus on those capable of eliminating any significant adverse environmental effects or reducing them to a level of insignificance, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly. It requires that the "no project" alternative be

evaluated. Section 15370 of the CEQA Guidelines defines mitigation and lists avoiding, minimizing, rectifying, and reducing project impacts before compensating for impacts by replacing or providing substitute resources. State and Federal policy state that the preferred method of mitigation is impact avoidance.

The DEIR must provide a thorough description of mitigation measures proposed to reduce or eliminate any significant impacts. The monitoring program required by Assembly Bill 3180, must ensure that mitigation measures are effective and provide for corrective action if they are not effective.

Department personnel are available to discuss our concerns further. Please contact Jim Lidberg, Associate Wildlife Biologist, at (805) 528-0782; or Carl Wilcox, Environmental Services Supervisor, at (707) 944-5525.

Sincerely,

Cindy Catalano
for Brian Hunter
Regional Manager
Region 3

cc: Ms. Marie C. K. Lindsey
Ms. Kate Symonds
U. S. Fish and Wildlife Service
Ventura Field Station
2493 Portola Road, Suite B
Ventura, California 93003

Ms. Tiffany Welch
U. S. Army Corps of Engineers
Los Angeles District
2151 Alessandro Drive, Suite 100
Ventura, California 93001

Cayucos
CITIZENS ADVISORY COUNCIL
P.O. BOX 781 • CAYUCOS, CA 93430

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JUN 11 1997
S.L.O. COUNTY
PLANNING DEPT.

June 4, 1997

Ms. Nancy E. Rollman, AICP
Environmental Div.
Dept. of Planning and Building
County Government Center, Room 310
San Luis Obispo, CA 93408

Dear Ms. Rollman:

This letter responds to your Notice of Preparation of the Environmental Impact Report (EIR) for the Estero Area Plan Update. Since the Advisory Council is not a permitting agency, we have only three items relevant to your request for information.

First, the Council and community have provided Mike Wulkan with considerable input on the Area Plan Update during public meetings over the last two years. Our concerns regarding riparian habitats, shoreline areas, and scenic resources are documented in his files and appear to be addressed in the outline of the Plan Update. Mike has indicated he will provide you any details on these issues that you require.

Second, one requested change does not appear in the Update outline. The Council had requested that it receive special notices of development planned for the rural fringe area of Cayucos, because most of these lands lie in the Adelaida Planning Area. We believe that the Estero Area Plan EIR should acknowledge the potential impacts of significant projects in the Adelaida Planning Area.

Third, impacts associated with the amendment submitted by Estero Bay Properties are of great concern to our community. We understand that the Planning Dept. will request that this amendment receive special attention in a separate EIR. The Council will hold public meetings and develop a separate, detailed recommendation on this matter.

If you have any questions or require any other information, please don't hesitate to contact me at 995-3059. We look forward to receiving a copy of the draft EIR when it is ready.

Sincerely yours,

Bruce S. Gibson
Chairman, Land Use Committee

city of san luis obispo

955 Morro Street • San Luis Obispo, CA 93401

WHALE ROCK PROJECT 108 OLD CREEK ROAD CAYUCOS 93430 995-3701

June 6, 1997

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S.L.O. COUNTY
PLANNING DEPT.

County of San Luis Obispo
Department of Planning and Building
Environmental Division
County Government Center Rm. 310
San Luis Obispo, CA 93408

ATT: Nancy Rollman

RE: ED93-186

Regarding the information requested for the Estero Area Plan Update;

1. **NAME OF CONTACT PERSON.** I will be the contact person for the Whale Rock Commission. I can be reached at:

   City of San Luis Obispo
   108 Old Creek Road
   Cayucos, CA 93430
   Att: Bob Hamilton
   995-3701.

2. **PERMIT(S) or APPROVAL(S) AUTHORITY.** The Whale Rock Commission is a joint powers authority comprised of three member agencies. The agencies are:

   City of San Luis Obispo
   California Men's Colony
   California Polytechnic State University

The Commission controls operation of the Whale Rock Dam, reservoir, and some adjacent lands within the watershed. The project area encompasses approximately 1200 acres.

3. **ENVIRONMENTAL INFORMATION.** Areas of concern for the Whale Rock Commission are limited to the Cayucos Fringe Study Area of the EIR, which is included as part 5 of the Estero Area Plan "A secondary study area within the Adelaida Planning Area". This planning area contributes runoff directly to the reservoir. Adverse impacts could reduce surface water quality if not properly mitigated. During development of the EIR for the Cayucos Fringe Area, please consider the following;

   A. Whale Rock Reservoir is one of the primary water supplies for the City of San Luis Obispo, California Men's Colony, and California Polytechnic University. In addition, Whale Rock is the sole water supply for the entire community of Cayucos. To safeguard this resource, protective zoning of the water supply should be established. This could include creek

The City of San Luis Obispo is committed to include the disabled in all of its services, programs and activities.

3A. (Cont.)

setbacks, limited development near creeks, limited industry, reduced urbanization, etc. Zoning changes which contribute to additional erosion or pesticide and fertilizer runoff should also be carefully considered. Impacts from dairies, cropland runoff, roads, mining, industrial discharges, wastewater discharges, septic tanks, hazardous materials, and general urbanization can all effect the raw water quality of the reservoir and potability of the finished water produced.

B. Whale Rock Reservoir and surrounding lands are designated as a Sensitive Resource Area. The EIR should address requirements and standards so that proposed uses consider;

1. No adverse effects should be allowed on the natural features of the site or vicinity that were the basis of the SRA designation.
2. No degradation of lakes, ponds, wetlands, or watercourses from construction or landscaping should be allowed.
3. Setback requirements for the upland extent of wetlands and from riparian areas, including mitigation measures for protection of these areas.
4. Limitations on streambed or riparian vegetation alteration.

C. The Whale Rock Reservoir fishery includes Steelhead Trout (Salmo gairdnerii), a landlocked trout indigenous to the reservoir since construction in 1961. These species should be identified within the area plan and given full consideration and protection.

4. **PERMIT STIPULATIONS/CONDITIONS.** The Whale Rock Commission does not own or control lands beyond the reservoir and state lands immediately adjacent to the reservoir, therefore the Commission cannot directly implement control measures in the majority of the watershed.

5. **ALTERNATIVES.** None.

6. **REASONABLY FORSEEABLE PROJECTS, PROGRAMS or PLANS.** None.

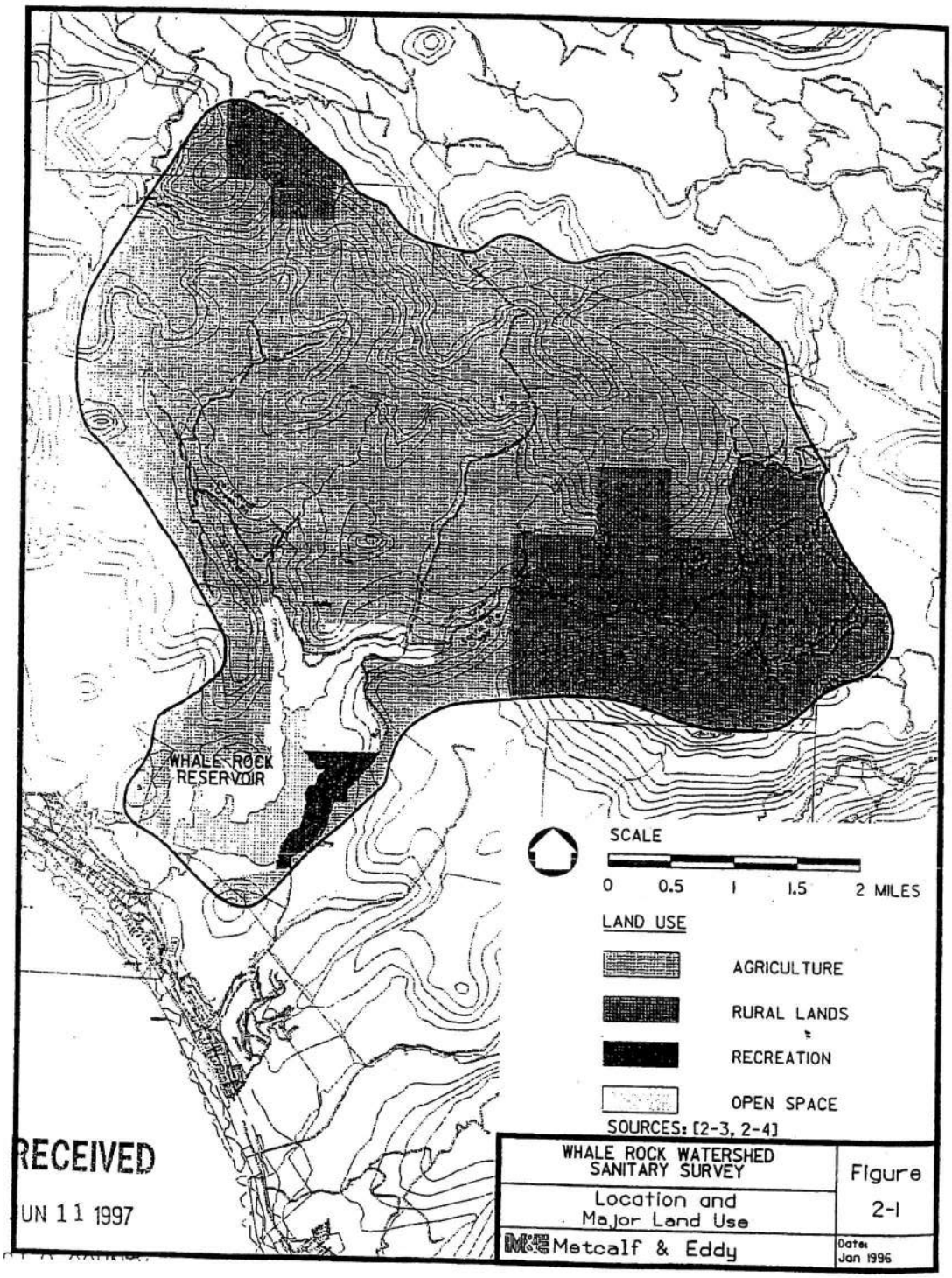
7. **RELEVENT INFORMATION.** WHALE ROCK WATERSHED SANITARY SURVEY; Metcalf & Eddy, Inc.; Palo Alto, CA; January 1996. SOURCE WATER PROTECTION: AN OUNCE OF PREVENTION; American Water Works Association; August, 1995.

8. **FURTHER COMMENTS.** Please see enclosed Major Land Use category map from the Whale Rock Watershed Sanitary Survey, and Pollutant/Land Use matrix from the AWWA Source Water Protection Guide.

Please do not hesitate to contact me if you have questions.

Sincerely,

Bob Hamilton,
Water Supply Supervisor
Whale Rock Dam
encl.



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Land Use	Turbidity, Sediment	pH	N,P	Algae	Viruses, Parasites	Bacteria	THM Precursors	Pesticides	Other SOCs	VOCs	Heavy Metals	Fe, Mn
Cropland runoff	•		•	•	•	•	•	•			•	•
Daries, feedlots	•		•	•	•	•	•					
Grazing	•		•	•	•	•	•					
Recreation					•	•						
Forest managmeent	•		•	•		•	•	•				•
Roads	•		•	•			•					•
Mining	•	•									•	•
Industrial discharge	•	•	•	•		•	•	•	•	•	•	•
Wastewater discharge	•	•	•	•	•	•	•	•	•	•	•	•
Septic tanks		•	•	•	•	•	•	•				
Urbanization	•	•	•	•	•	•	•	•	•	•	•	•
Hazardous materials								•	•	•	•	•
Acid rain		•										

Figure 3-5: Pollutant/Land-Use Matrix

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STATE OF CALIFORNIA–THE RESOURCES AGENCY
DEPARTMENT OF CONSERVATION
PETE WILSON, Govern
DIVISION OF OIL, GAS, AND GEOTHERMAL RESOURCES
5075 SOUTH BRADLEY ROAD, SUITE 221
SANTA MARIA, CALIFORNIA 93455-5077
(805) 937-7246
TELEFAX (805) 937-0673

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PLANNING DEPT.

June 3, 1997

Nancy E. Rollman, AICP
Environmental Division
Dept. of Planning & Building
County Government Center, Room 310
San Luis Obispo, CA 93408

Re: NOP - Estero Plan

Dear Ms. Rollman:

The following information is provided as requested for the Notice of Preparation for the Estero Area Plan Update:

1. NAME OF CONTACT

William E. Brannon, Deputy Supervisor
State of California
Div. of Oil, Gas & Geothermal Resources
5075 S. Bradley Rd., Suite 221
Santa Maria, CA 93455
(805) 937-7246

2. APPROVAL(S) AUTHORITY

State of California
Public Resources Code (PRC)
Div. 3, Chap. 1, Art. 4, Sect. 3208.1 (a) & (b)

3. ENVIRONMENTAL INFORMATION

Permits or approvals are issued only on a site specific basis.

4. PERMIT STIPULATIONS/CONDITIONS

This agency advises project applicants/county agencies to require the following:

a. Research and determine if any oil/gas wells lie within the project boundary.
b. Submit a plat of the project with suspected well locations plotted on plat.

c. Locate, survey, and determine if leakage is occurring. If leakage is detected or structure design requires reabandonment of any well, specific requirements will be outlined at that time.
d. Final placement of structures which allows for future access to any well.

5. ALTERNATIVES

Limiting or excluding construction in or around any abandoned well.

6. REASONABLY FORESEEABLE PROJECTS, PROGRAMS or PLANS

Unknown

7. RELEVANT INFORMATION

None

8. FURTHER COMMENTS

In addition to oil well locations, other facilities related to oil drilling and production operations may have been present on the site. A thorough investigation of the construction site for oil contaminated soil should be required prior to construction.

Should you have any questions or require further information, please do not hesitate to contact us.

Sincerely,

William E. Brannon
Deputy Supervisor

PAA:dj

Cal/EPA

State Water Resources Control Board

Division of Water Rights

Mailing Address:
P.O. Box 2000
Sacramento, CA
95812-2000

901 P Street
Sacramento, CA
95814
(916) 657-2055
FAX (916) 657-1485

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JUN 16 1997
S.L.O. COUNTY
PLANNING DEPT.

Pete Wils
Governo

JUNE 10 1997

Ms. Nancy E. Rollman, AICP
Environmental Division
Department of Planning & Building
County Government Center, Room 310
San Luis Obispo, CA 93408

Dear Ms. Rollman:

NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT FOR THE ESTERO AREA PLAN UPDAGE, ED93-186

The State Water Resources Control Board, Division of Water Rights, is the agency responsible for administering the laws governing the right to divert, store, and make beneficial uses of the waters of the State. Because I have been working on water right applications and petitions for change in the Morro Creek and Chorro Creek drainages, I have been designated the contact person for this Notice of Preparation.

The Division maintains public records of water diversion and storage by appropriative water right holders. Also on file are statements of use by riparian water right holders. Some of this information may be of use to the County when analyzing water resources. Please let me know if you would like any information about the Division's files.

Please add my name to the distribution list for any environmental impact report prepared pursuant to the subject NOP. You can address all correspondence to me at the mailing address in the letterhead. I can be reached by telephone at (916) 657-2055 or by email at joanj@wrfs2.swrcb.ca.gov .

Sincerely,

Joan M. Jurancich
Environmental Specialist

Cal/EPA

Central Coast Regional Water Quality Control Board

81 Higuera Street
Suite 200
San Luis Obispo, CA
93401-5427
(805) 549-3147
FAX (805) 543-0397

Pete Wilson
Governor

June 4, 1997

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PLANNING DEPT.

Ms. Nancy Rollman, Environmental Specialist
Department of Planning & Building, Environmental Division
County Government Center, Room 310
San Luis Obispo, CA 93408

Dear Ms. Rollman:

RESPONSE TO NOTICE OF PREPARATION - ESTERO AREA PLAN UPDATE; ED 93-186 (SCH #97051045)

Thank you for submitting the captioned environmental document for our review. **In the absence of specific language describing the project and potential impacts, we are assuming water quality concerns may not be adequately addressed.** Therefore we offer the following information regarding our authority, plans and programs:

GENERAL COMMENTS

The Central Coast Regional Water Quality Control Board (Regional Board or RWQCB) is charged with the protection of the Waters of the State of California in the Central Coast Region. Waters of the State include ocean waters, surface waters, ground waters, and wetlands. The Regional Board is responsible for administering regulations established by the Federal Clean Water Act and the California Water Code.

The Central Coast Regional Water Quality Control Plan (Basin Plan) explains the Regional Board's strategy for regulating water quality. The Basin Plan also describes the range of responses available to the Regional Board with regard to actions and proposed actions that may degrade the beneficial uses of the Waters of the State of California.

Proposed projects must conform to our Basin Plan's relevant programs and policies. A partial listing of our Basin Plan's plans and policies is attached to this letter (Attachment 1). **Any person discharging waste, or proposing to discharge waste, that could affect the quality of the waters of the state, other than into an already regulated community sewer system, must file a report of waste discharge (ROWD Form 200) with this office.**

NPDES PROGRAM

Discharges to surface water are regulated by the Federal National Pollutant Discharge Elimination System (NPDES) Program (established by the Clean Water Act), which controls and reduces pollutants to water bodies from both point and nonpoint discharges. In California the NPDES program is administered by the California Regional Water Quality Control Boards. The Regional Board has authority to issue NPDES permits for point source discharges to water bodies in the Central Coast area.

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Our mission is to preserve and enhance the quality of California's water resources, and ensure their proper allocation and efficient use for the benefit of present and future generations.

The NPDES Program has been very successful in reducing pollutants caused by point sources such as wastewater treatment plants and industrial discharges. However, significant pollution is still being carried into surface waters from non point sources.

Storm water is the major source of fresh water to creeks and waterways. Storm water quality is affected by a variety of land uses and the pollutants generated by these activities. Development and construction activities cause both site-specific and cumulative water quality impacts. Water quality degradation may occur during construction due to discharges of sediment, chemicals and wastes to nearby storm drains or creeks. Water quality degradation also may occur due to discharges of petroleum hydrocarbons, oil, grease and metals from vehicles; pesticides and fertilizers from landscaping; and bacteria from pets and people. Runoff may be concentrated and storm water flow increased by impervious surfaces, which will mobilize and transport pollutants to storm drains and creeks. Cumulatively, these discharges will increase pollutant loads in creeks, wetlands, and the Pacific Ocean. Some of these non point source discharges are regulated through the NPDES Storm Water Program, which includes municipal permits and statewide general permits for construction and industrial activities.

Municipal (area-wide or county-wide) Storm Water Discharge Permits

If a municipal (area-wide or county-wide) permit is issued, the municipality must develop and implement a storm water management plan (SWMP) to control pollutants in municipal storm water runoff. The SWMP must also include a program for implementing new development and construction site storm water quality controls. The objective of this component of the SWMP is to ensure that appropriate measures to control pollutants from new development are (1) considered during the planning phase, before construction begins, (2) implemented during the construction phase, and (3) maintained after construction throughout the life of the project.

Storm Water Associated with Construction Activity

Projects disturbing more than five acres of land during construction are regulated under the Statewide NPDES General Permit for Discharges of Storm Water Associated with Construction Activity. This can be accomplished by filing a Notice of Intent with the State Water Resources Control Board. The project sponsor must propose and implement control measures that are consistent with the General Construction Permit, and with recommendations and policies of local agencies and the RWQCB.

Discharges of Storm Water Associated with Industrial Activity

Projects that include industrial facilities with discharges of storm water are regulated under the Statewide NPDES General Permit for Discharges of Storm Water Associated with Industrial Activity. This may be accomplished by filing a Notice of Intent with the State Water Resources

Control Board. The project sponsor must propose control measures that are consistent with the General Industrial Permit and with recommendations and policies of the local agency and the RWQCB. In a few cases, the project sponsor may apply for (or the RWQCB may require) issuance of an individual (industry or facility specific) permit.

Stormwater Mitigation Measures

Project impacts should be minimized by developing and implementing a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP must be consistent with the terms of the Statewide General Construction Permit and the Statewide General Industrial Permit, with policies and recommendations of the local authority, and with recommendations of the RWQCB. Attached is a list of mitigation measures which must be considered for incorporation into a SWPPP (Attachment 2).

CLEAN WATER ACT SECTION 401 WATER QUALITY CERTIFICATION

The Regional Board must certify that any permit issued by the U.S. Army Corps of Engineers (ACOE) pursuant to Section 404 of the Clean Water complies with state water quality standards, or waive such certification. Section 401 Water Quality Certification is necessary for all Section 404 permits, including reporting and non-reporting Nationwide permits. **Any project requiring a 404 permit from the ACOE should apply for Section 401 Water Quality Certification by submitting a Form 200 Report of Waste Discharge Application. Applications may be obtained from this office.** Any project which involves disturbance of a streambank or riparian area must also obtain a Streambed Alteration Agreement from California Department of Fish and Game.

Wetlands enhance water quality through such natural functions as flood and erosion control, stream bank stabilization, and filtration and purification of contaminants. Wetlands also provide critical habitats for hundreds of species of fish, birds, and other wildlife, offer open space, and provide many recreational opportunities. Water quality impacts occur in wetlands from construction of structures in waterways, and from activities such as dredging, filling, and altering drainage to wetlands. **The State of California's Wetlands Conservation Policy requires no overall net loss of wetlands in the short term and a long-term net gain of wetlands. All projects must be evaluated for the presence of jurisdictional wetlands.**

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Wetlands Mitigation Measures

In the event wetland loss is not avoidable, mitigation will be preferably in-kind and on-site with no net destruction of habitat value. Mitigation will preferably be completed prior to, or at least simultaneous to, the filling or other loss of existing wetlands. Successful mitigation projects are complex tasks and difficult to achieve, and this will be considered during agency review of any proposed wetland fill. Wetland features or ponds created as mitigation for the loss of existing "jurisdictional wetlands" or "waters of the United States" cannot be used as storm water treatment controls.

WASTEWATER/SEWAGE DISCHARGE TO A REGULATED PUBLICLY OWNED TREATMENT WORKS (POTW)

The existing POTW must have capacity and agree to accept maximum projected wastewater flows from a project at ultimate buildout.

WASTE DISPOSAL TO LAND

Disposal of solid waste to land in the Central Coast Region is regulated by California Code of Regulations, Title 23, Chapter 15, the federal Resource Conservation and Recovery Act, the Toxic Pits Cleanup Act, the Porter-Cologne Water Quality Control Act, and State Health Department Regulations. Types of land disposal operations being regulated by the Central Coast Region include landfills, surface impoundments, septage and sludge disposal, mining operations, confined animal facilities, and some oil field exploration and production facilities.

Disposal of liquid wastes to land (such as wastewater ponds, septic systems, reclamation projects, etc.) is also regulated by the RWQCB. All such disposal systems must comply with the RWQCB Basin Plan, and with requirements stipulated by the State Department of Health Services for protection of public health.

For a discharge of waste to land, or discharge of wastewater other than to a sewer system, a report of waste discharge must be filed with this office no later than six months prior to operation. Based on the information submitted in the application, staff will determine whether formal regulation of the site through issuance of waste discharge requirements (WDRs) will be necessary.

If you require specific information on the programs discussed in this letter, please contact the following:

Storm Water Program	Matt Fabry	(805) 549-3458
Section 401 Water Quality Certification, NPDES permits, WDRs	Sorrel Marks	(805) 549-3695
Basin Plan information	Angela Carpenter	(805) 542-4624

Sincerely,

Bradley E. Hagemann

FOR Roger Briggs
Executive Officer

KH/p:/khaas/winword/files/nop/estero.doc/SJM\ch\h:\letters

Attachments

cc: State Clearinghouse
1400 Tenth Street
Sacramento, CA 95814

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PLANS AND POLICIES
OF THE
STATE WATER RESOURCES CONTROL BOARD
AND THE
REGIONAL WATER QUALITY CONTROL BOARD

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State Policy for Water Quality Control (1972)

Statement of Policy with Respect to Maintaining High Quality of Waters in California (Anti-degradation Policy)

Water Quality Control Plan for Control of Temperature in Coastal and Interstate Waters and Enclosed Bays and Estuaries of California (Thermal Plan)

Water Quality Control Policy for the Enclosed Bays and Estuaries of California (Bays and Estuaries Policy)

Power Plant Cooling Policy

Reclamation Policy

Shredder Waste Disposal Policy

Underground Storage Tank Pilot Program

Sources of Drinking Water Policy

Nonpoint Source Management Plan

Water Quality Control Plan for Ocean Waters of California (1990) (Ocean Plan)

Discharges of Municipal Solid Waste Policy

Sewerage Facilities and Septic Tanks in Urbanizing Areas in the Central Coast Region

Acceptance of Monterey County Board of Supervisor's Ordinance Applying Development Restrictions to the Bays Hills (Bay Farms/Hillcrest)

Acceptance of Monterey County Board of Supervisors' Ordinance Applying Development Restrictions to the Area within the San Lucas County Water District

Policy Regarding Beneficial Use of Oil Field Waste Materials in the Santa Maria Oil Fields, Santa Barbara County

Policy Amending "Policy Regarding Beneficial Use of Oil Field Waste Materials in the Santa Maria Oil Fields, Santa Barbara County" to apply Region Wide

Recommendation to the State Water Resources Control Board Concerning the Designation of Terrace Point in Santa Cruz County as an Area of Special Biological Significance

PLANS AND POLICIES
OF THE
STATE WATER RESOURCES CONTROL BOARD
AND THE
REGIONAL WATER QUALITY CONTROL BOARD

Supporting Approval of the Clean Water and Water Conservation Bond Law of 1978

Regarding Marina County Water District's Petition to Delete the Southern Monterey Bay Discharge Prohibition Zones from the Basin Plan

Certification of Santa Cruz County's Wastewater Management Program for the San Lorenzo River Watershed

Policy Regarding Disposal of Highway Grooving Residues

Waiver of Regulations of Specific Types of Waste Dischargers

Interpretation of Minimum Parcel Size Requirements for On-Site Sewage Systems

Appreciation for Discharger Compliance

Support Material for Calculating Adjusted Sodium Absorption Ratio (SAR) Area

Nipomo Individual Sewage Disposal System Prohibition Area Description

San Lorenzo Valley Class I Area

San Lorenzo Valley Class II Area

Los Osos Baywood Park Individual and Community Sewage Disposal System Prohibition Area

Preliminary List of Potential Toxic Hot Spots

Salinas Ground Water Basin and Sub-Areas

Paso Robles Ground Water Basin and Sub-Areas

Santa Maria Ground Water Basin and Sub-Areas

Lompoc Ground Water Basin and Sub-Areas

Policies and Procedures for Investigation and Cleanup and Abatement of Discharges under Water Code Section 13304

Water Quality Enforcement Policy

CONTROL ACTIONS TO AVOID AND/OR MINIMIZE IMPACTS TO STORMWATER QUALITY AND WETLANDS

Potential impacts from project development should be avoided and minimized by developing and implementing the following types of controls:

Site Planning Controls

The project should minimize impacts from project development by incorporating appropriate site planning concepts. This should be accomplished by designing and proposing site planning options as early in the project planning phases as possible. Appropriate site planning concepts to consider include, but are not limited to the following:

1. Phase construction to limit areas and periods of impact;
2. Minimize directly connected impervious areas;
3. Preserve natural topography, existing drainage courses and existing vegetation;
4. Locate construction and structures as far as possible from streams, wetlands, drainage areas, etc.;
5. Reduce paved area through cluster development, narrower streets, use of porous pavement or retaining natural surfaces;
6. Minimize use of gutters and curbs which concentrate and direct runoff to impermeable surfaces;
7. Use existing vegetation and create new vegetated areas to promote infiltration;
8. Design and layout communities to reduce reliance on cars;
9. Include green areas for people to walk their pets, thereby reducing build-up of bacteria, worms, viruses, nutrients, etc. in impermeable areas (or institute ordinances requiring owners to collect pets' excrement);
10. Incorporate low-maintenance landscaping;
11. Design and lay out streets and storm drain systems to facilitate easy maintenance and cleaning;
12. Consider need for runoff collection and treatment systems; and
13. Label storm drains to discourage dumping of pollutants into them.

Erosion Controls

The project should minimize erosion and control sediment during and after construction. This should be done by developing and implementing an erosion control plan, or equivalent plan (which should be included in the SWPPP). The plan should specify all control measures which will be anticipated or used including, but not limited to, the following:

CONTROL ACTIONS TO AVOID AND/OR MINIMIZE IMPACTS TO STORMWATER QUALITY AND WETLANDS

1. Limit access routes and stabilize access points;

2. Stabilize denuded areas as soon as possible with seeding, mulching or other effective methods;

3. Protect adjacent properties with vegetative buffer strips, sediment barriers or other effective methods;

4. Delineate clearing limits, easements, setbacks, sensitive areas, vegetation and drainage courses by marking them in the field;

5. Stabilize and prevent erosion from temporary conveyance channels and outlets; and

6. Use sediment controls and filtration to remove sediment from water generated by dewatering or collected on site during construction. For large sites, stormwater settling basins will often be necessary.

Chemical and Waste Management Controls

The project should minimize impacts from chemicals and wastes used or generated during construction. This should be done by developing and implementing a plan or set of control measures (that should be included in the SWPPP). The plan should specify all control measures which will be anticipated or used, including, but not limited to the following:

1. Designate specific areas of the site, away from streams or storm drain inlets, for storage, preparation and disposal of building materials, chemical products and wastes;

2. Store stockpiled materials and wastes under a roof or plastic sheeting;

3. Store containers of paints, chemicals, solvents, and other hazardous materials stored in containers under cover during rainy periods;

4. Berm around storage areas to prevent contact with runoff;

5. Cover open dumpsters securely with plastic sheeting, a tarp or other cover during rainy periods;

6. Designate specific areas of the site, away from streams or storm drain inlets for auto and equipment parking and for routine vehicle and equipment maintenance;

7. Routinely maintain all vehicles and heavy equipment to avoid leaks;

8. Perform major maintenance, repair, and vehicle and equipment washing off-site, or in designated and controlled areas on-site;

9. Collect used motor oil, radiator coolant or other fluids with drip pans or drop cloths;

10. Store and label spent fluids carefully prior to recycling or proper disposal;

CONTROL ACTIONS TO AVOID AND/OR MINIMIZE IMPACTS TO STORMWATER QUALITY AND WETLANDS

11. Sweep up spilled dry materials (cement, mortar, fertilizers etc.) immediately- do not use water to wash them away;

12. Clean up liquid spills on paved or impermeable surfaces using "dry" cleanup methods (e.g. absorbent materials, cat litter, rags) and dispose of cleanup materials properly;

13. Clean up spills on dirt areas by digging up and properly disposing of the soil; and

14. Keep paint removal wastes, fresh concrete, cement mortars, cleared vegetation, and demolition wastes out of gutters, streams and the storm drains by using proper containment and disposal.

Post-Construction Controls

The project should minimize impacts from other pollutants which may be generated by the project post-construction. These pollutants may include sediment, bacteria, metals, solvents, oil and grease or pesticides, all of which are typically generated during the life of a residential, commercial or industrial project after construction has ceased. This should be done by developing and implementing a plan or set of control measures (that should be included in the SWPPP). The plan should specify all control measures which will be anticipated or used including, but not limited to the source controls and treatment controls discussed in the California Storm Water Best Management Practice Handbooks; EPA's Guidance Specifying Management Measures for Sources of Nonpoint Pollution in Coastal Waters; and by Regional Board Staff.

COUNTY OF SAN LUIS OBISPO

Department of Agriculture/Measurement Standards

2156 SIERRA WAY, SUITE A • SAN LUIS OBISPO, CALIFORNIA 93401-4556
RICHARD D. GREEK
AGRICULTURAL COMMISSIONER/SEALER
(805) 781-5910
FAX (805) 781-1035

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S.L.O. COUNTY
PLANNING DEPT.

June 2, 1997

TO: **Nancy Rollman, Environmental Specialist**

FROM: **Robert Hopkins, Deputy Agricultural Commissioner**

SUBJECT: ***Estero Planning Area Notice of Preparation of An Environmental Impact Report***

This report responds to your Notice of Preparation of an Environmental Impact Report (EIR) for the Estero Planning Area. The comments and recommendations in our report are based on current departmental policy to conserve agriculture resources and to provide for public health, safety and welfare while mitigation negative impacts of development to agriculture

Environmental and Relevant Information

We recommend a review of the agricultural resources section of the San Luis Obispo Area Plan EIR. The content and scope of agriculturally related information for the San Luis Obispo Area Plan would be appropriate for the Estero Planning Area. A fairly complete list of needed agricultural information and issues is contained in Appendix 1.1 of the EIR Initial Study Section.

Permit Conditions

We recommend the use of a referral process for the evaluation of parcel specific land use category change requests. During the initial study of the San Luis Obispo Area Plan, proposals to change the land use category from Agriculture to other categories were referred to our office. Besides providing site specific agricultural resource information, we evaluated each request and made a preliminary determination as to the potential for significant impacts to agricultural resources. Our responses were contained in the response to the initial study section of the EIR (refer to EIR). This initial review process appeared beneficial to environmental impact analysis and to decision makers when evaluating individual requests.

I have included a copy of the current agricultural buffer policy. This policy is not applicable to the area plan update, but will provide beneficial reference information. Portions of the buffer policy were included in the agricultural resources section of the San Luis Obispo Area Plan. Additionally we recommend that the San Luis Obispo County Right to Farm Ordinance be referenced with the Agricultural Resources section of the EIR, in a manner similar to the San Luis Obispo Area Plan EIR.

For further clarification of the agricultural issues or question generated by this referral please give me a call.

Paso Robles Beach Water Association
P.O. Box 315
Cayucos, CA 93430
(805) 995-3766

Estero NOP

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May 16, 1997

Nancy E. Rollman, AICP
Department of Planning & Building
Environmental Division
County Government Center
San Luis Obispo, CA 93408

Dear Ms Rollman,

Returning your questionaire, being an existing private water company, few if any of the questions are of any consequence to our present or future plans.

Sincerely,

Robert R. Lyon, by E.B.

Robert R. Lyon, President

Appendix 2.0 Mitigation Reporting Plan

Mitigation Reporting Plan - San Luis Obispo County Estero Area Plan Update

Typically, mitigation measures in Area Plan EIRs consist of new or amended policies or programs. Such is the case for the Estero Area Plan. The EIR suggested policy changes or additions to further mitigate impacts. The following table includes all of the policy changes proposed by the DEIR.

Mitigation measures must be adopted as part of the final document. Substitutions are limited to equal or better measures that achieve the same or better result.

Mitigation Measures		
Issue Area	**Mitigation (Policy/Program)**	**Already added to the AP? (yes/no)**
Noise	**N-1. Equipment Maintenance.** All construction equipment shall be in proper operating condition and fitted with factory standard silencing features.	No
	N-2. Dirt-Hauling Route Orientation. Dirt hauling routes shall be oriented away from existing noise-sensitive land uses.	No
	N-3. Vehicle Staging Area Siting. Stockpiling and vehicle staging areas shall be located as far as practical from occupied structures.	No
	N-4. Portable Noise Barriers. Temporary portable noise barriers shall be erected between sensitive structures and construction areas during those activities that utilize high noise generating equipment, unless the construction activity would be of short duration (a few days). These temporary barriers could reduce noise levels by approximately 3 to 5 dBA, depending upon the materials used to erect such a feature. Non-noise generating construction activities, such as interior painting, would not be subject to this restriction.	No
	N-5. Acoustical Shielding. Noise impacts from mechanical and electrical equipment, such as ventilation or air-conditioning units shall be minimized by locating equipment away from receptor areas, installation of equipment with proper acoustical shielding, and including the use of parapets into building designs. Moreover, the use of block sound attenuation walls, greenbelts, and/or setbacks shall be required at boundary lines between commercial/industrial and sensitive uses.	No
	N-6. Loading Dock Time Restrictions. If noise problems should arise from loading dock operations within commercial and industrial land use areas, deliveries shall be restricted only to hours permitted by the County of San Luis Obispo. It is suggested that loading dock operations near noise-sensitive receptors be prohibited during the nighttime hours.	No
	N-7. Commercial and Industrial Facility Design. Design of new commercial and industrial facilities adjacent to residential land uses shall site truck loading areas, garbage dumpsters, and loudspeaker systems away from adjacent residential property lines. Sound attenuation walls or landscaped setbacks shall be required at property lines between commercial/industrial and residential uses.	No

	N-8. If the Exterior Noise Level is 60-65 dBA Ldn/CNEL - Air conditioning or a mechanical ventilation system; Windows and sliding glass doors mounted in low air infiltration rate frames (0.5 cfm or less, per ANSI specifications); Solid core exterior doors with perimeter weather stripping and threshold seals.	Yes - Noise Element
	N-9. If the Exterior Noise Level is 65-70 dBA Ldn/CNEL - The same as N-9; Exterior walls consist of stucco or brick veneer. Wood siding with a ½" minimum thickness fiberboard ("soundboard") underlayer may also be used; Glass in both windows and doors should not exceed 20% of the floor area in a room; Roof or attic vents facing the noise source should be baffled (see Appendix C in County Noise Element Acoustical Design Manual for an example).	Yes -Noise Element
	N-10. If the Exterior Noise Level is 70-75 dBA/CNEL - The same as N-10; The interior sheetrock of exterior wall assemblies should be attached to studs by resilient channels. Staggered studs or double walls are acceptable alternatives; Window assemblies should have a laboratory-tested STC rating of 30 or greater.	Yes - Noise Element
	N-11. Proposed Recreation Category (North Cayucos Area). A site-specific acoustical analysis shall be performed for proposed development in this area.	No
Drainage & Water Quality	**DWQ-1.** Consistency with Applicable Drainage-Related Plans. All new development in or near existing drainage systems and associated tributaries shall be consistent with applicable existing (and proposed) drainage, grading, erosion control, and water quality-related policies, standards, and programs to the extent feasible including but not limited to the following: • San Luis Obispo County Coastal Zone Land Use Ordinance including Section 23.05.020 et. seq., Section 23.050.040 et. seq., Section 23.05.030 et. seq., Section 23.07.060 et. seq., and Section 23.06.100; • Water Quality Control Plan - Central Coast Basin including Best Management Practices (BMPs)	No
	DWQ-2. Pollution Stormwater Grease Traps. New development shall implement measures to eliminate pollutants from storm runoff prior to its drainage offsite. Such measures include grease traps in association with sedimentation detention basins. Grease traps should be sized so that at least the first inch from any one storm is retained on the project site to percolate and/or evaporate. Smaller developments (individual houses, home additions) may be exempt at the discretion of County Engineering.	No
	DWQ-3. CZLUO Amendment. If the current draft CZLUO amendment package is not adopted, the proposed Area Plan shall be amended to include equal or better drainage and water quality protection measures.	No
Public Services	**PS-1.** By 2016, the County shall evaluate the need for an additional fire station in the Estero Area.	No
	PS-2. Add the following policy: "Monitor parks for degradation of natural resources, facilities, and other features throughout the implementation of the Estero Area Plan."	No
Biological Resources	**BR-1.** Implement Sedimentation Reduction Measures. Implement drainage measures recommended in Section 5.6 to reduce potential downstream sedimentation impacts to insignificance.	No

	BR-2. Tree Replacement. Oaks, sycamores and other native trees that cannot be avoided by development shall be replaced at a ratio and in a manner determined appropriate by the County.	No
	BR-3. Plant/Animal Survey Procedures. Until such time that a County ordinance is adopted, surveys for endangered and sensitive plant and animal species shall be conducted during proper seasons and in accordance with standard technical methodologies. Appropriate mitigation measures in accordance with DFG guidelines shall be developed if necessary to reduce impacts of sensitive species to insignificance.	No
	BR-4. Construction Activity Timing. Where sensitive species are known to occur within a proposed project area, timing of construction activities shall be barred from species breeding and/or migration seasons in order to minimize detrimental impacts. These limitations in construction timing are often included as provisions within associated permits. For example, construction activities occurring in or directly adjacent to a perennial stream such as Chorro Creek, may be limited to the summer months in order to minimize disturbance of steelhead spawning activities as part of a Section 1601 or 1603 CDFG streambed alteration agreement.	No
	BR-5. Prepare and Submit a Revegetation Plan. For all development expected to result in removal or significant disturbance of natural vegetation, the applicant shall contact the Department of Planning and Building/Environmental Coordinator to determine their responsibilities in terms of revegetation and restoration. The plans shall be prepared by a qualified botanist, restoration specialist, or firm that is approved by the County. The plan shall address all natural communities impacted by all phases of the proposed project including central dune scrub, chaparral, annual grassland, and coastal scrub. The plan shall provide detailed specifications for replacement and restoration of all affected natural communities, including appropriate replacement ratios for disturbed native plants, and shall specify the duration and frequency of monitoring associated with revegetation/restoration efforts.	No
	BR-6. Implement the pre-approved revegetation plan. Upon completion of construction for all new development, the applicant shall implement the pre-approved revegetation and restoration plan described above. Following completion of construction, immediately revegetate all areas previously containing natural vegetation and disturbed as a result of project implementation. Revegetate only with appropriate indigenous native vegetation. At a minimum, the structure and composition of habitats restored shall reflect pre-project site conditions or better. The health and maintenance of all replacement vegetation shall be monitored for a sufficient duration and frequency to ensure successful establishment of the vegetation.	No

	BR-7. Control Further Introduction of Invasive Exotic Plants at New Development Sites. During and upon completion of construction, the project proponent shall be required to control further introduction of invasive exotic plants. To control further introduction of invasive exotic plants within areas disturbed by new construction activities, the project proponent shall implement the following measures. • Use only clean fill material (free of weed seeds) within all construction zones. • Prohibit planting or seeding disturbed portions of natural communities with non-native plant species. • Control the establishment of invasive exotic weeds in all disturbed areas.	No
	BR-8. Avoid Disturbance of Special-Status Plants at New Development Sites. During construction associated with all new development, avoid or minimize disturbance of special-status plants. Implement the measures identified below to avoid or minimize unnecessary disturbance of special-status plants either known or having potential to occur in the project area. • Retain a qualified biologist to conduct focused surveys for special-status plant species during the appropriate flowering periods for various species having potential to occur in the project area. • Clearly map and identify each individual or groups of special-status plants observed during the surveys with highly visible flagging, and then completely avoid during construction. • In the event rare plants cannot be avoided during ground disturbance activities, applicable resource agencies should be contacted to determine appropriate avoidance measures prior to construction. Various measures may include relocation and transplanting of individual plants, and/or stockpiling of existing soils to retain the seedbank.	No
	BR-9. Implement Erosion and Spill Control Measures during Construction. To reduce the potential for inadvertent release of sediment or fuel from construction areas to adjacent drainage and wetland areas, the following measures shall be implemented as part of all development projects. • To the extent feasible, limit construction activities to the typical dry season to avoid indirect impacts to seasonal drainages and wetland habitats related to increased runoff and sedimentation from areas experiencing ground disturbance. • During construction, avoid all cleaning and refueling of equipment and vehicles near existing drainages and associated seasonal wetland habitat. • Following completion of construction-related activities, revegetate all disturbed and barren areas with appropriate native vegetation to reduce the risk of erosion and sedimentation in adjacent drainage areas.	No
	BR-10. The County shall develop and revise current landscaping plan guidelines to include prohibition of the planting of invasive exotics designated by CNPS.	No

	BR-11. Eliminate Proposed Density Increases in Areas of Endangered Species Habitat. At least two parcels in Los Osos are proposed for density increases (Cuesta Inlet area, and Sweet Springs area west of 4th Street). The known or presumed presence of endangered species (e.g. Morro shoulderband snail) indicates that these areas are not appropriate for density increases without considerable additional environmental analysis, including a comprehensive plan for mitigation as might be developed under the HCP.	Yes
Cultural Resources	**CR-1.** Mitigation for archaeological resources suggests a program for discretionary requirement of surveys for projects that have the potential to disturb archaeological resources. The reader should note that the following represents the current practice of the County in determining archaeological sensitivity for specific projects. The Environmental Division should employ a presumption that all project sites within the planning area are sensitive unless site features would indicate otherwise. Continue to utilize procedures employed by the Environmental Division for protection of archaeological resources as described above. These can be summarized as follows: • Review discretionary permits on a case-by-case basis. • Projects in the Estero planning area that appear to have characteristics indicative of Native American use are required to complete a Phase I surface survey. • If archaeological resources are found, mitigation is required. Subsurface investigation may be necessary to determine the site's extent and/or significance. • Mitigation measures for significant sites may include site avoidance, Phase II testing, Phase III excavation, burial of site under a blanket of sterile fill, and monitoring of earth-moving activities in the vicinity of site. Because of the sensitivity of resources in the Estero planning area, all development activities that require ground disturbance (no matter what type of activity) should be carefully reviewed by the Environmental Division for the possibility of archaeological resources. The Environmental Division should consider the following when deciding whether a project merits further archaeological investigation: • the project lies on relatively flat land (not on steep slopes) • is relatively undisturbed • is within proximity and reasonable access to a water source • is proximate to rock outcroppings • is near the conjunction of multiple habitat types • is near other recorded sites	No
	CR-2. All archaeological (and, when appropriate, historical) information should be maintained in a secure and confidential manner to minimize the potential for improper investigations and vandalism of cultural resources.	No
	CR-3. If the proposed amendments to the CZLUO are not approved, a functional equivalent of such language shall be incorporated into the Estero Area Plan.	No

Policies and programs were referred to in the EIR discussion as important mitigating measures that are already in the Area Plan. These are too numerous to list here, and appear on almost every page of the EIR. Area Plan policies and programs referred to in the EIR are considered mitigation and must therefore be included in the reporting program.

Per CEQA (Section 21081.6), the County

> "shall adopt a reporting or monitoring program for the changes to the project which it has adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment. The reporting or monitoring program shall be designed to ensure compliance during project implementation".

The changes to the proposed Area Plan include Planning Area Standards and Programs which are the mechanisms for implementing the goals and policies of the Plan.

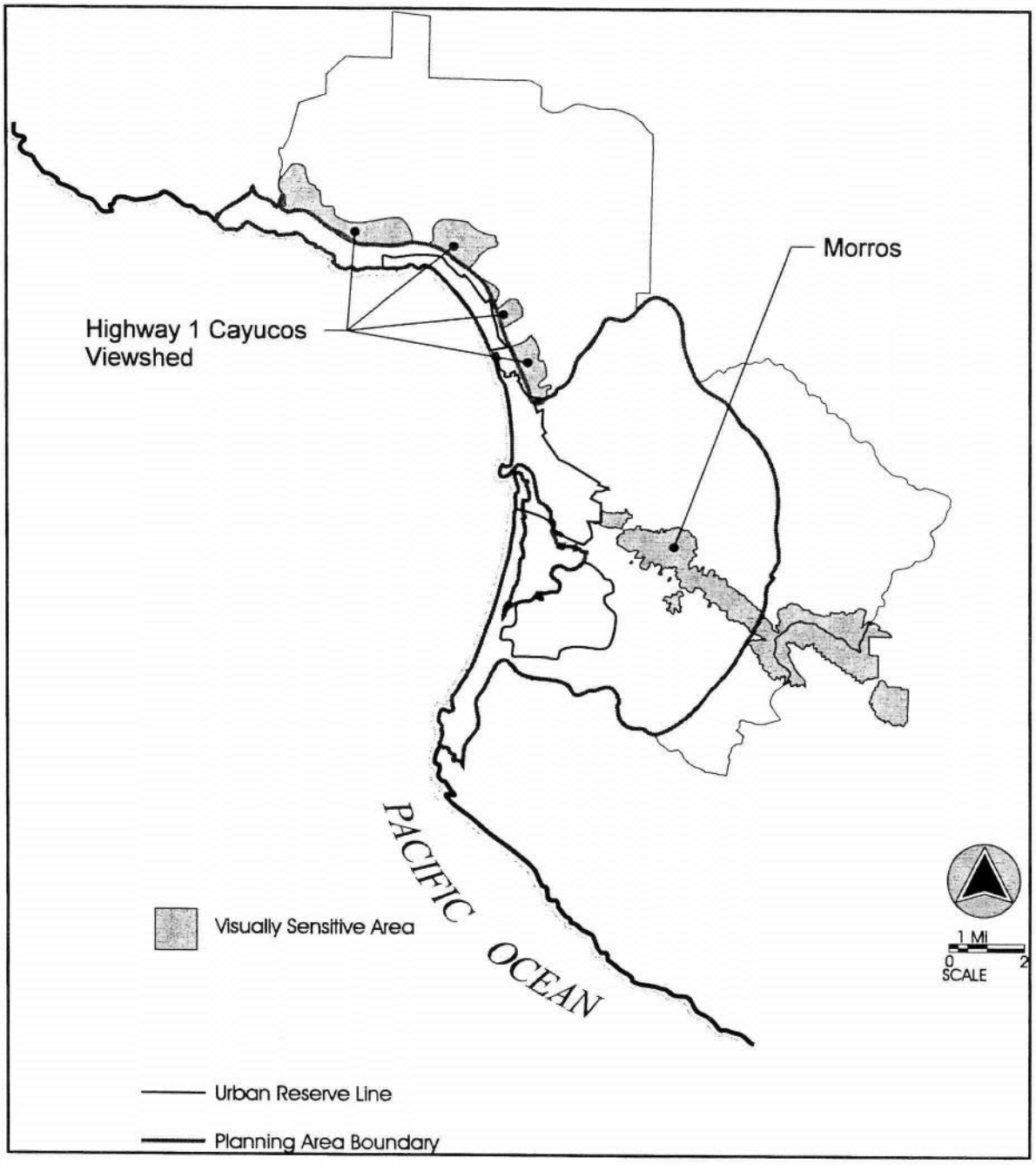
The County's General Plan process, along with other county-adopted and -required programs with associated updates, includes built-in mechanisms that serve as the monitoring and reporting program (refer to Table E-1). These include:

A. Resource Management System and Annual Resource Summary Report (Water Supply & Systems, Sewage, Roads, Schools, Air Quality)
B. County Permit Processing of New Development
C. Periodic Area Plan and County Element Updates
D. Clean Air Plan Update and regular Air Quality monitoring (APCD)
E. Noise Element Update
F. Annual Update of the Regional Transportation Plan
G. Periodic Update of the State Transportation Implementation Program
H. Annual Update of Public Facility Fee Program (applies to capital improvements for county public buildings, sewage collection/disposal facilities, storm water/flood control, transportation/transit facilities, parks and recreation facilities)
I. Periodic Updates on the State Pesticide Management Program
J. Periodic Updates of the Federal Census
K. Periodic Updates of resource-related documents (e.g., aerial photos, California Natural Diversity database, GIS data, etc.)

Applying these processes will provide either the means to incorporate protective measures into future development, or measure the success of incorporating required measures to mitigate for potential environmental impacts.

For an Area Plan, therefore, physical monitoring of mitigation measure implementation is not feasible or useful. Through the processes above, along with the annual General Plan report, the County will make efforts to rectify ineffective policies or programs while ensuring continued implementation of successful measures. The County may update policy and program language as needed in order to substitute equal or better measures to achieve reduction of environmental impact.

Appendix 5.10 Sensitive Visual Resource Areas



Sensitive Visual Resource Areas

Appendix 7.0 Draft Alternatives

7.0 Alternatives

The California Environmental Quality Act requires the consideration of a range of alternatives that meet the objectives of the proposed project while reducing or eliminating potential adverse environmental impacts. For a comprehensive general plan revision, the range of alternatives will necessarily be similar in scope to the proposed project, but will reflect different land use and buildout scenarios. The analysis of alternatives can be especially useful to decision-makers in their task of balancing the goals and objectives of various general plan alternatives with their respective adverse environmental consequences.

7.1 Description of Alternatives

The following analysis compares buildout conditions of the proposed Estero Area Plan with the following four alternatives:

No Project - No Additional Development. CEQA requires that a "no project" alternative be evaluated by a DEIR. Under the No Development - No Project alternative, development would be frozen at levels that existed in 1994 and no additional development would be allowed. In this regard, conditions associated with the No Development alternative are roughly equivalent to the baseline conditions used in the analytical sections of this DEIR. In most circumstances, however, a No Development scenario is unlikely, given legal limitations on maintaining moratoria. On the other hand, the Estero Area is currently facing very strong limits on development because of the RWQCB's prohibition of septic systems in Los Osos, and because of water limits in Cayucos. As discussed in the relevant sections of this DEIR, these restrictions will eventually be lifted. Furthermore, continued moratoria are unrealistic in light of the large number of legal lots remaining in the Estero planning area. A long-term prohibition on development would require either purchase of these lots or the voluntary abstinence from development by the owner.

The environmental consequences of this alternative would be reduced impacts associated with each impact category compared to buildout under the Draft Plan or one of the other alternatives. However, the objectives of the proposed Area Plan update would not be achieved under this alternative.

No Project - Buildout In Accordance With Adopted Area Plan. This "no-project" alternative would result in buildout of the Estero planning area in accordance with the land uses policies, standards and programs currently in place. The existing Estero Area Plan would accommodate more single family residences, but slightly fewer multi-family units than the draft plan. Retail development would be less, as would the number of motel units accommodated at buildout. The amount of office space accommodated would be much higher than in the draft plan. Impacts associated with traffic, air pollution and the demand for public services would be similar but slightly greater than those associated with the draft plan.

Resource Conservation Alternative. This alternative accommodates fewer numbers of single family and multi-family residences but more business park floor area than the proposed plan, and less floor area for commercial retail, office and motel development. The overall less intensive development of the Resource Conservation alternative, compared with the draft plan, would result in lower traffic, air pollution, noise and the demand for public services.

Economic Diversification Alternative. This alternative represents the most intensive development scenario for the Estero planning area of the four alternatives. Buildout potential for every land use category is the same as or higher than the proposed plan, with the exception of the number of multi-family residential units and the floor area of office development which are slightly lower. The generally higher intensity of development would result in the greatest impacts to traffic, air pollution, noise, and the demand for public services.

Draft Area Plan. The draft area plan is the project evaluated by this Draft EIR, as mitigated by measures recommended for each impact topic.

Although each alternative represents slight differences in land use for each sub-area of the Estero planning area, the major differences among them reflect different land uses for the large, contiguous vacant parcels within the community of Los Osos, referred to as *focus areas*, which are described below.

7.2. Methodology

The analysis of alternatives is divided into two tiers. The first compares buildout conditions and the associated environmental consequences for each alternative for the entire Estero planning area. The analysis is further broken down by community sub-area, by land use category, and by population, and assumes a buildout year of 2027. Table 7-6 provides a summary of the environmental impacts associated with each alternative and compares the impacts by resource category with those associated with the draft area plan. The significance of the potential impact for each resource category is provided by applying the thresholds of significance used in the topical sections of this draft EIR. Where possible, the magnitude of the impact has been quantified and compared with buildout conditions associated with the draft area plan. Table 7-6 also ranks each alternative from least impact to greatest impact.

The second tier compares buildout conditions associated with four *Focus Areas* within the community of Los Osos. The focus areas are four largely undeveloped areas identified during the preparation of the Draft Area Plan for which land use categories and standardsare recommended. Three or four alternative land use scenarios for each focus area are identified that generally correspond to the categories described above (No Project, No Project – Existing Estero Area Plan, Resource Conservation and Economic Diversification). Because the focus areas comprise the largest contiguous parcels of undeveloped land within the community, each land use alternative will have different environmental consequences and a different effect on the character of the community. This second tier analysis compares the alternatives for each focus area with the impacts associated with the draft area plan. As with the analysis provided for the overall Estero planning area, a summary table is provided for each focus area which compares (quantitatively where possible) each alternative and its environmental consequences, along with a conclusion regarding the significance of the impact. And since numerous combinations of these alternatives are possible, with correspondingly different environmental consequences, the analysis also ranks each alternative for each focus area in terms of least impact to greatest impact.

7.3 Analysis of Alternatives for the Estero Planning Area

Table 7-1 compares buildout conditions associated with the proposed Draft Area Plan with the range of alternatives described above for the entire Estero planning area. The highest total for each land use/population category is shown in bold face type. Generally, the Economic Diversification alternative accommodates the most intensive urban development with significantly more retail and business park development and single family dwellings than the existing Estero Area Plan or the Draft Plan. The Resource Conservation alternative would accommodate the least amount of overall urban development among the alternatives, with the exception of the No Project/No Development alternative which essentially freezes development at 1994 levels. The following sections assess the impacts associated with each alternative from three perspectives: by land use categories, by sub-areas of the Estero planning area, and by population. Table 7-6 provides an overall summary of the impacts associated with each alternative for the planning area as a whole, and provides a conclusion on the significance of the impacts for each resource category based on the thresholds used throughout this draft EIR. Impacts that are higher than those associated with the draft area plan are shown in bold face type.

Table 7-1: Comparison of Draft Estero Area Plan With Alternatives (Totals at Buildout)

	No Project/ No Additional Development (1994)	No Project/ Buildout of Adopted Area Plan	Resource Conservation Alternative	Economic Diversification Alternative	Draft Area Plan
Single Family Homes	7,204	10,223	9,669	**10,374**	9,753
Multi-Family Homes	1,495	3,069	2,488	3,033	**3,301**
Commercial Retail (SF)	488,000	881,855	916,080	**1,280,792**	955,834
Commercial Service (SF)[1]	182,000	**209,905**	**209,905**	**209,905**	**209,905**
Business Park (SF)[2]	0	0	314,122	**613,052**	205,800
Office (SF)	23,000	**372,879**	123,824	132,857	160,824
Motel (rooms)/Camping Units	170/85	256/165	390/165	**598/165**	**598/165**
Population	18,409	**31,729**	28,924	31,517	31,100

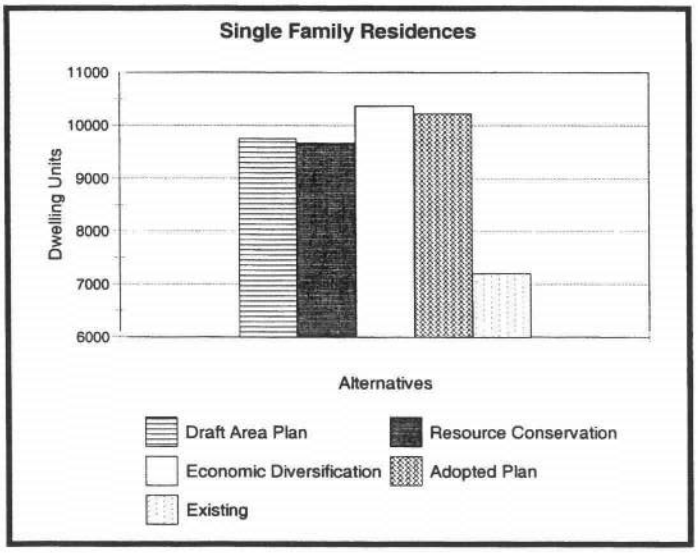
1. Does not include Business Parks, which are listed separately.
2. Business Parks are an allowable use in the Commercial Service land use category but are listed separately.
3. Highest totals for each category are shown in bold face type.

Source: County of San Luis Obispo

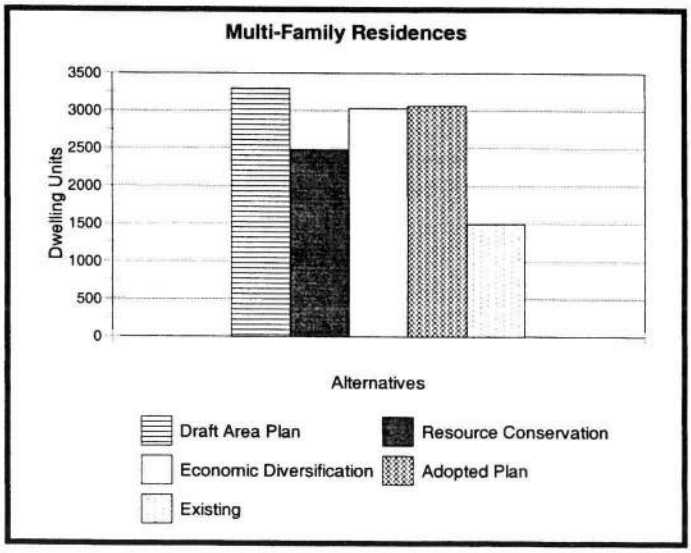
7.3.1 Comparison of Alternatives By Land Use Category

Single Family Residential

The figure below compares the total number of single family residences accommodated by each alternative at buildout. The figure clearly illustrates the differences among the Resource Conservation, Economic Diversification, and the No Project-Adopted Area Plan buildout scenarios. The Resource Conservation alternative would accommodate a slightly lower number of single family dwellings at buildout than the Draft Plan, with environmental consequences similar to those described in this DEIR. The Economic Diversification and Existing Estero Area Plan alternatives would accommodate significantly more single family dwellings than the Draft Plan, with consequences as described below.



Potential Environmental Consequences.
The higher number of single family residences associated with the Economic Diversification and Existing Estero Area Plan alternatives would generate greater demand for public services than that associated with the Draft Plan, including water, sewer, schools, police and fire protection. Traffic would be greater under these alternatives compared with the draft plan, along with a corresponding increase in the emission of air pollutants and noise. Another potential consequence of higher levels of residential development associated with the Economic Diversification and Existing Estero Area Plan alternatives is the ratio of jobs to employed residents. Increasing the supply of housing will accommodate greater numbers of employed persons living within the Estero planning area. Currently, the jobs to employed resident ratio is about .38 in Cayucos and about .31 in Los Osos, which may mean that a disproportionate number of employed persons commute to work with a corresponding increase in motor vehicle trips and air pollution. Compared to the draft plan, the existing plan has less land devoted to job-generating land uses (such as retail, business park, and office). Therefore, the greater number of dwellings accommodated by the existing plan would result in a lower ratio of jobs to employed residents. However, the Economic Diversification alternative increases the amount of land devoted to potentially job-generating uses by over 45%, compared to the Draft Plan, while the number of single-family dwellings increases by only about 6%. Therefore, it appears that the Economic Diversification Alternative could result in a higher ratio of jobs to employed residents than the Draft Plan.



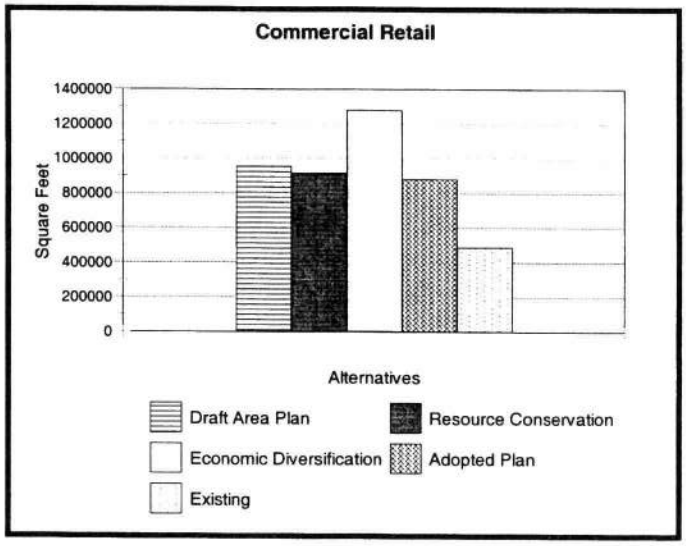
Multi-Family Residential

The Draft Area Plan would accommodate a higher level of multi-family residential development at buildout than the alternatives, including the adopted area plan. The Resource Conservation Alternative will accommodate about 2,500 multi-family units at buildout, or about 1,000 more than currently exists, but about 800 fewer units than the draft plan.

Potential Environmental Consequences. The slightly lower number of multi-family units associated with the Economic Diversification and No Project- Existing Plan alternatives would result in slightly less demand for public services, a slightly reduced level of traffic and air pollutant emissions. The Resource Conservation alternative would accommodate significantly fewer multi-family residences within the Estero planning area, which would result in less demand for public services and a smaller increase in the amount of traffic generated and corresponding air pollution. However, multi-family residential dwellings are generally affordable to a wider range of incomes, including low- and moderate-income households. The Resource Conservation alternative would result in fewer numbers of these types of units being built, which in turn may conflict with other goals of the Area Plan which seek to promote affordable housing for all income groups within the Estero planning area.

Commercial Retail

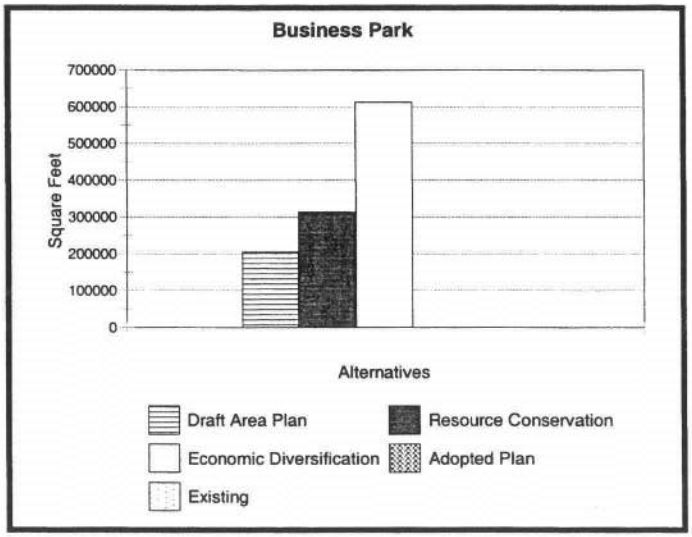
One of the most important differences among the alternatives is in the level of commercial retail development accommodated at buildout. The figure below compares the floor area in square feet of commercial retail development accommodated by each. Clearly, the Economic Diversification alternative accommodates the most retail development, followed by the Draft Plan, the Resource Conservation Alternative and the Existing Plan.



Potential Environmental Consequences. Higher levels of retail development would mean increased traffic, air pollution and noise. However, vehicle trips could actually decline if increased commercial development "captures" a greater amount of shopping that would otherwise occur outside the Estero planning area. In addition, jobs generated by commercial development could help improve the ratio of jobs to employed residents, which in turn could reduce job-oriented vehicle trips.

Business Park

Another important difference among the alternatives, when compared with the existing area plan, is the amount of land designated for business park development. The current plan accommodates business park development



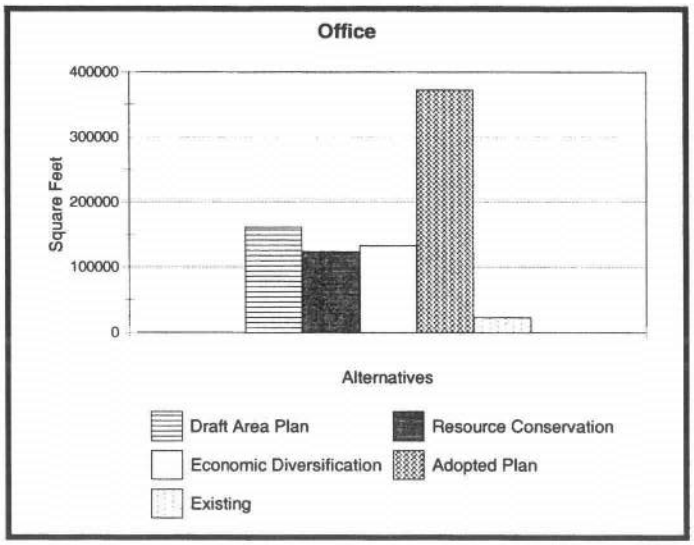
but does not specifically designate any land for such development; moreover, there is none developed within the Estero planning area. The Economic Diversification alternative would accommodate over 600,000 square feet of business park development at buildout, followed by the Resource Conservation alternative (314,000 sq .ft.) and the Draft Plan (205,800), respectively.

Potential Environmental Consequences. As with retail development, higher levels of business park development could generate additional traffic, air pollution, noise, and in some instances, greater demand for water, sewer and other public services. To the extent that jobs associated with such development match the labor pool within the Estero planning area, greater levels of business park development could reduce job-related vehicle trips and associated air pollution and noise.

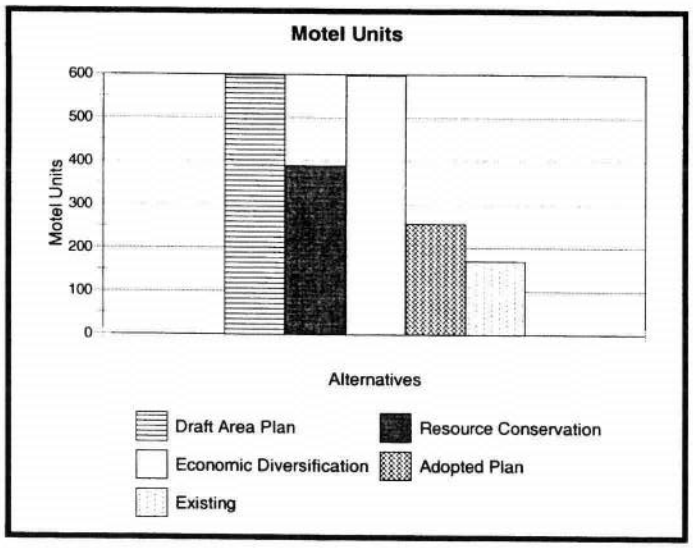
One of the goals of the Business Park land use category is to promote the development of job centers based on a comprehensive design in which buildings, parking, circulation, landscaping and other development features are arranged in a manner that complements the physical features of a site and integrates well with surrounding land uses. These goals may not be achieved through conventional industrial or light industrial development in which a site is subdivided into several building sites which are developed individually. To the extent that Business Parks accomplish these goals, potential land use compatibility impacts with surrounding land uses will be minimized.

Office

Another important difference in each alternative compared with the adopted area plan is in the amount of land designated for office development. The adopted area plan would accommodate as much as 370,000 square feet of office development within the Estero planning area, compared with 120,000 - 160,000 square feet for the alternatives, including the draft plan. Much of the land currently designated for office development is proposed for commercial retail and multi-family residential development by each alternative.



Potential Environmental Consequences. Less office development may result in an increase in the number of vehicle trips, air pollution and noise as residents travel outside the Estero planning area for services and jobs that could be supported by this land use category.



Motel/Visitor Serving Land Uses.

The draft plan accommodates about 600 motel/hotel units at buildout, which is more than twice the number accommodated by the existing Estero Area Plan and about 210 more than the Resource Conservation alternative. The Economic Diversification alternative would accommodate about the same number of motel units as the Draft Plan, with similar environmental consequences. All three represent a clear departure from the existing Estero Area Plan in terms of emphasizing visitor-serving land uses.

Potential Environmental Consequences. A substantial increase in the number of motel rooms would result in increased traffic, noise and air pollution, along with an increase in the demand for public services, especially water and sewer. Traffic associated with visitor-serving land uses tends to be during non-peak hours of the day since these trips are not typically associated with the home-to-work or work-to-home commute.

7.3.2 Comparison of Alternatives By Community Sub-Area

Los Osos

Table 7-2 compares buildout conditions in Los Osos under the draft plan and the four alternatives. Single family residential development is reduced under each alternative when compared to the existing Estero Area Plan, while the Resource Conservation alternative provides for the fewest number of multi-family units.

Table 7-2: Comparison of Buildout Conditions of the Draft Estero Area Plan With Four Alternatives – Los Osos Sub-Area

	No Project/No Development (1994)	No Project/ Buildout of Adopted Area Plan	Resource Conservation Alternative	Economic Diversification Alternative	Draft Plan
Single Family Homes	5,275	**7,791**	7,117	6,731	7,327
Multi-Family Homes	895	2,063	1,639	2,074	**2,189**
Commercial Retail (SF)	374,200	711,612	744,210	**1,032,360**	747,110
Commercial Service (SF)[1]	176,100	**198,634**	**198,634**	**198,634**	**198,634**
Business Park (SF)[2]	0	0	314,122	**907,082**[3]	205,800
Office (SF)	10,100	**310,447**	61,392	97,982	101,392
Motel (rooms)	48	96	218	**360**	**360**
Population	14,568	**24,536**	21,803	21,925	23,700

1. Does not include Business Parks, which are listed separately.
2. Business Parks are an allowable use in the Commercial Service land use category but are listed separately.
3. Includes 294,000 sq.ft. of business park outside Los Osos urban reserve line.
4. Highest totals are shown in bold face type.

Source: County of San Luis Obispo Proposed Estero Area Plan, Plan Alternatives Appendix, 1998.

Another notable difference among the alternatives is the amount of retail commercial development accommodated by the Economic Diversification alternative compared to the other three. The draft plan, Resource Conservation, and Economic Diversification alternatives each propose a campus-like business park within Morro Shores Mixed Use Area which is intended to support research and development firms, offices, light manufacturing and assembly businesses, and other related supporting businesses. The Economic Diversification alternative would support an additional 294,000 square feet of business park development at the southeast corner of Los Osos Valley Road and Clark Valley Road, and outside the urban reserve line. The amount of office development accommodated by each alternative is lower compared to the existing Estero Area Plan because of a reduction in the amount of Office and Professional zoning.

Cayucos

Table 7-3 compares buildout conditions in Cayucos under the draft plan with the four alternatives. Table 7-3 shows that single family residential development is substantially increased under the Economic Diversification alternative and slightly increased under the Resource Conservation alternative. The draft plan provides about the same amount of single family housing as the existing Estero Area Plan, but provides for about 10 percent more multi-family units.

Retail square footage increases the most in Cayucos under the Economic Diversification alternative, followed by the draft plan. The Economic Diversification alternative provides for less office development than the other alternatives (except for the no additional development alternative). The number of motel rooms increases slightly at buildout under the Resource Conservation alternative, when compared to existing conditions, and the existing Estero Area Plan, but almost doubles under the draft plan and the Economic Diversification alternative.

Table 7-3: Comparison of Buildout Conditions of the Draft Estero Area Plan With Four Alternatives – Cayucos Sub-Area

	No Project/No Additional Development (1994)	No Project/ Buildout of Adopted Area Plan	Resource Conservation Alternative	Economic Diversification Alternative	Draft Plan
Single Family Homes	1,602	1,741	1,860	**2,934**	1,734
Multi-Family Homes	600	1,006	849	959	**1,112**
Commercial Retail (SF)	113,800	170,243	171,870	**248,432**	208,724
Commercial Service (SF)[1]	5,900	**11,271**	**11,271**	**11,271**	**11,271**
Office (SF)	12,900	**62,432**	**62,432**	34,875	59,432
Motel (rooms)	122	160	**172**	238	238
Population	3,055	5,348	5,273	**7,702**	5,550

1. There is no Business Park planned for Cayucos.
2. Highest totals are shown in bold face type.

Source: County of San Luis Obispo.

Rural Estero

Table 7-4 shows that there is little numerical difference among the buildout alternatives for Rural Estero. Each alternative would accommodate approximately 700 single family residences at buildout, and would contain some rural camping units; no commercial development is proposed. (The area designated for business park development at the southeast corner of Los Osos Valley Road and Clark

Valley Road is included in the Economic Diversification alternative for the Los Osos sub-area on Table 7-2.)

Table 7-4: Comparison of Buildout Conditions of the Draft Estero Area Plan With Four Alternatives -- Rural Estero Sub-Area

	No Project/No Additional Development (1994)	No Project/ Buildout of Adopted Area Plan	Resource Conservation Alternative	Economic Diversification Alternative	Draft Plan
Single Family Homes	327	691	692	**708**	692
Multi-Family Homes	0	0	0	0	0
Commercial Retail (SF)	0	0	0	0	0
Commercial Service (SF)	0	0	0	0	0
Office (SF)	0	0	0	0	0
Camping Units	85	**165**	**165**	**165**	**165**
Population	920	1,845	1,848	**1,890**	1,850

1. Highest totals are shown in bold face type.

Source: County of San Luis Obispo

7.3.3 Comparison of Alternatives by Population Characteristics

Table 7-5 compares the population holding capacity of each alternative with that of the draft plan and provides a comparison of the remaining population that can be accommodated until buildout. Overall, the existing Estero Area Plan can accommodate the largest buildout population for the Estero planning area as a whole and for the community of Los Osos.

Table 7-5: Potential Additional and Total Population at Buildout Estero Planning Area

	No Project/ 1994 Population	**No Project/ Buildout of Adopted Area Plan**		**Resource Conservation Alternative**		**Economic Diversification Alternative**		**Draft Plan**	
		Remaining Population to Buildout1	Total At Buildout	Remaining	Total At Buildout	Remaining	Total At Buildout	Remaining	Total At Buildout
Los Osos[1]	14,568	10,007	**24,536**	7,274	21,803	7,396	21,925	9,132	23,700
Cayucos[2]	3,055	2,381	5,348	2,306	5,273	4,768	**7,735**	2,495	5,550
Rural[3]	920	932	1,845	935	1,848	977	**1,890**	930	1,850
Total	18,543	13,320	**31,729**	10,515	28,924	13,141	31,550	11,461	31,100

1. Assumes 2.5 people per dwelling unit, 0 % vacancy.
2. Assumes 2.16 persons per occupied dwelling unit (existing ratio) and 11 % vacancy for existing development, and 5% vacancy for future development.
3. Includes: Rural -- 2.67 persons per occupied unit, 0% vacancy.

Source: County of San Luis Obispo.

Table 7-6: Comparison of Impacts of Draft Estero Area Plan With Alternatives

Impact Topic	No Project/ No Additional Development (1994)	No Project/ Buildout of Adopted Area Plan	Resource Conservation Alternative	Economic Diversification Alternative	Draft Plan
Population	18,409	31,729	28,924	31,517	31,100
Water					
Impact Compared to Draft Area Plan	Lower	Higher	Lower	Higher	8,649 acre-feet per year
Significance	Not Significant	Significant and Unavoidable	Significant and Unavoidable	Significant and Unavoidable	Significant and Unavoidable
Discussion	Water supply impacts would vary slightly among the alternatives. However, in each case the policy response of the Area Plan would reduce potential impacts to a less than significant level.				
Sewer					
Impact Compared to Draft Area Plan	Higher	Higher	Lower	Higher	5.2 million gallons per day
Significance	Significant	Not Significant; assumes Los Osos sewer system	Not Significant; assumes Los Osos sewer system	Not Significant; assumes Los Osos sewer system	Not Significant With Recommended Mitigation
Discussion	Sewer impacts would be significant if no sewer system is constructed for the community of Los Osos. However, buildout of the community under the existing Estero Area Plan or any other alternative could not occur in the absence of a sewer system.				
School Facilities					
Impact Compared to Draft Area Plan	Lower	Higher	Lower	Higher	4,000 students
Significance	Not Significant With Recommended Mitigation	Not Significant With Recommended Mitigation	Not Significant With Recommended Mitigation	Not Significant With Recommended Mitigation	Not Significant With Recommended Mitigation
Discussion	Recent changes in State law greatly limit the responsibilities of local governments for the mitigation of potential school facilities impacts associated with new development. The Leroy R. Greene School Facilities Act of 1998 (Government Code Section 65995 et seq.) allows local governments to require the payment of a statutory impact fee, only. Thus, the mitigation of school facilities impacts from any of the alternatives will be limited to the payment of these fees or such other mitigation as may be agreed to by the developer and school district.				

Impact Topic	No Project/ No Additional Development (1994)	No Project/ Buildout of Adopted Area Plan	Resource Conservation Alternative	Economic Diversification Alternative	Draft Plan
Other Public Facilities					
Impact Compared to Draft Area Plan	Lower	**Higher**	Lower	**Higher**	--
Significance	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation
Discussion	As with school facilities, local governments may charge facilities impact fees to help offset the potential impact on public services from new development. These fees may be charged for facilities, only, and not for the ongoing staffing, operation and maintenance of such facilities.				
Geology					
Impact Compared to Draft Area Plan	Lower	Similar	Similar	Similar	--
Significance	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation
Discussion	Geologic impacts at the site-specific level will vary depending on the nature and extent of new development as it occurs within the planning area under each alternative. However, the policy response of the area plan would reduce potential impacts to a less than significant level.				
Drainage					
Impact Compared to Draft Area Plan	Lower	Similar	Similar	Similar	--
Significance	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation
Discussion	Drainage impacts at the site-specific level will vary depending on the nature and extent of new development as it occurs within the planning area under each alternative. However, the policy response of the area plan would reduce potential impacts to a less than significant level.				
Biological Resources					
Impact Compared to Draft Area Plan	Lower	**Higher**	Lower	**Higher**	--
Significance	Significant and Unavoidable	Significant and Unavoidable	Significant and Unavoidable	Significant and Unavoidable	Significant and Unavoidable
Discussion	Although the area plan contains policies and standards aimed at minimizing the impacts to biological resources associated with new development, any additional development in the community of Los Osos will result in the cumulative loss of habitat for a number of sensitive plant and animal species as identified in this Draft EIR. Additionally, the draft area plan contains policies that favor the removal of exotic species within the planning area, especially in the community of Los Osos where African veldt grass is a particular problem. Lastly, buildout in accordance with the area plan or any of the alternatives cannot proceed in the absence of a sewer system for the community of Los Osos. Such a system will improve water quality in the Morro Bay estuary and surrounding tributary streams with corresponding improvements to habitat for biological resources. Therefore, since the draft area plan calls for the removal of exotic species and assumes the construction of a sewer system in Los Osos, the No Project/No Additional Development alternative may result in significant impacts to biological resources.				
Cultural Resources					

Impact Topic	No Project/ No Additional Development (1994)	No Project/ Buildout of Adopted Area Plan	Resource Conservation Alternative	Economic Diversification Alternative	Draft Plan
Impact Compared to Draft Area Plan	Lower	Similar	Similar	Similar	--
Significance	Not significant	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation
Discussion	Impacts to cultural resources at the site-specific level will vary depending on the nature and extent of new development and its location within the planning area under each alternative. However, the policy response of the area plan would reduce potential impacts to a less than significant level.				
Visual Resources					
Impact Compared to Draft Area Plan	Lower	**Slightly higher**	Lower	**Slightly higher**	--
Significance	Not Significant	Significant and Unavoidable	Significant and Unavoidable	Significant and Unavoidable	Significant and Unavoidable
Discussion	Although the area plan contains policies and development standards intended to minimize potential visual impacts associated with new development, the No Project/Existing Plan, Resource Conservation and Economic Diversification alternatives will all accommodate development within visually-sensitive areas that will have a cumulative significant and unavoidable impact.				
Traffic					
Quantified Impact At Buildout	10,803 peak hour trips	16,945 pht	16,228 pht	19,200 pht	17,043 pht
Impact Compared to Draft Area Plan	Lower	Slightly Lower	Lower	**Higher**	--
Significance	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation
Discussion	Each alternative results in lower peak hour trip generation than the draft area plan, with the exception of the Economic Diversification alternative. Although this alternative produces a substantial number of additional peak hour trips, the roadway and intersection improvements recommended by the area plan will accommodate the increased level of traffic without additional mitigation being needed. To the extent that existing deficiencies in roadway safety and/or level of service are not addressed, the No Project/No Development alternative could result in a significant impact compared with the draft plan and the other three alternatives.				
Noise					
Impact Compared to Draft Area Plan	Lower	Slightly Lower	Lower	**Higher**	--
Significance	Not Significant	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation
Discussion	Although noise levels will likely be higher under the Economic Diversification alternative, the policy response of the area plan will reduce potential impacts to a less than significant level.				
Air Quality					

Impact Topic	No Project/ No Additional Development (1994)	No Project/ Buildout of Adopted Area Plan	Resource Conservation Alternative	Economic Diversification Alternative	Draft Plan
Impact Compared to Draft Area Plan	Lower	Slightly Lower	Lower	**Slightly Higher**	--
Significance	Not Significant	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation
Discussion	The population holding capacities of the draft plan and the four alternatives are all within the population projections contained in the Air Quality Management Plan and used as one measure for determining consistency with the Plan. Using this standard, and assuming all of the measures recommended by the AQMP and this draft EIR are implemented, none of the alternatives will result in a significant adverse impact on air quality. On the other hand, individual development projects may generate emissions which exceed thresholds used by the APCD for determining the significance of air quality impacts. To the extent these emissions hinder efforts contained in the AQMP to achieve and maintain State and federal air quality standards, a significant adverse impact would occur. Regardless, the policy response of the area plan is to reduce the potential air quality impacts from new development by encouraging alternate forms of transportation to the automobile.				
Land Use					
Impact Compared to Draft Area Plan	Lower	Similar	Similar	Similar	--
Significance	Not Significant	Not Significant	Not Significant	Not Significant	Not Significant
Discussion	Although the area plan contains policies and standards to minimize conflicts among land uses, land use impacts are not considered significant for any of the alternatives.				

Impact Topic	No Project/ No Additional Development (1994)	No Project/ Buildout of Adopted Area Plan	Resource Conservation Alternative	Economic Diversification Alternative	Draft Plan
Agricultural Resources					
Impact Compared to Draft Area Plan	Lower	Similar	Similar	Similar	--
Significance	Not Significant	Not Significant	Not Significant	Not Significant	Not Significant
Discussion	Each of the alternatives would result in a permanent net loss of 38 acres of land designated for agricultural uses within the planning area. This represents less than one tenth of one percent of the total and is considered not significant.				

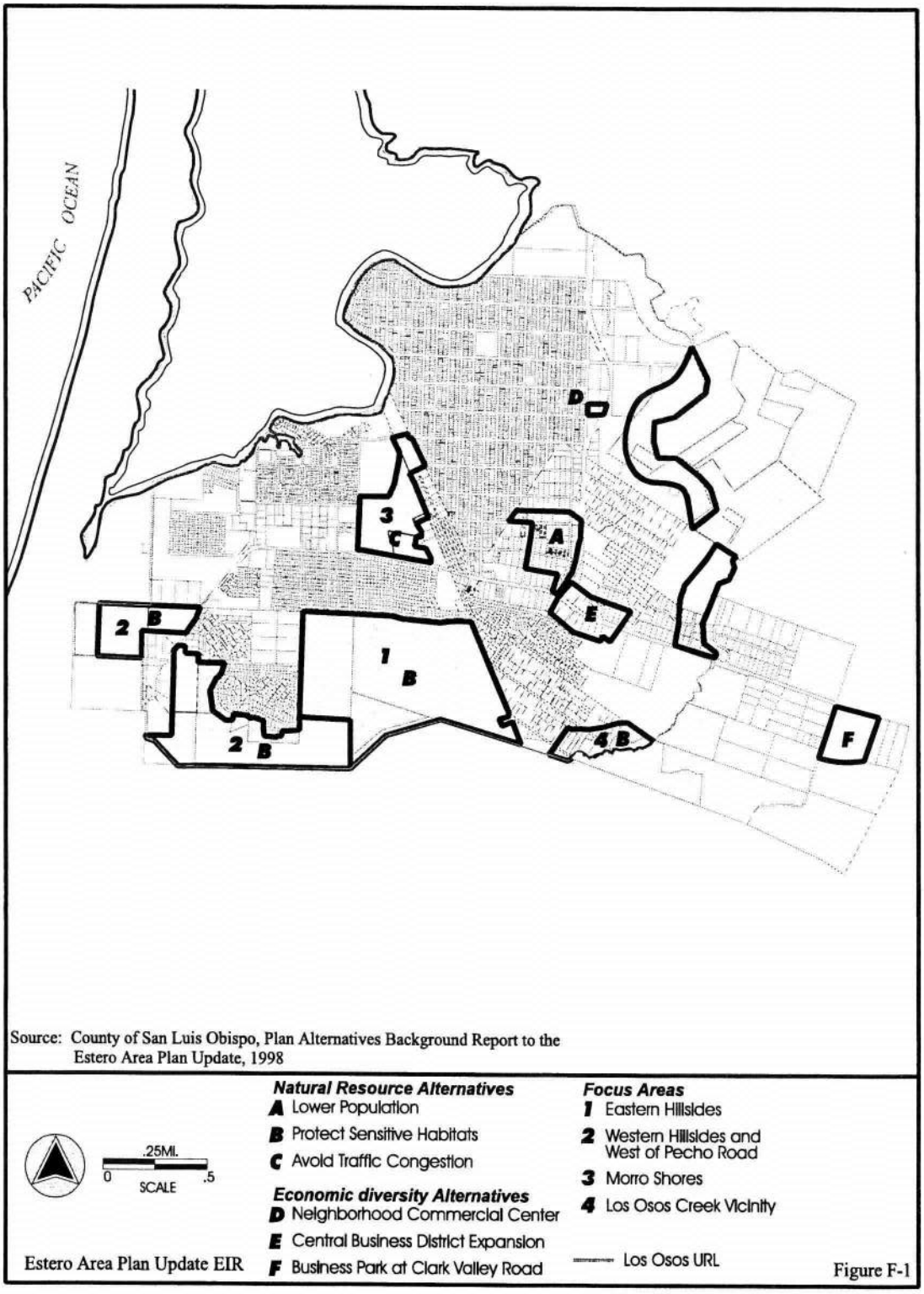
7.4 Analysis of Los Osos Focus Area Alternatives

As described above, during preparation of the Proposed Estero Area Plan four special management areas within and adjacent to the Los Osos urban reserve line were identified. These areas, referred to as *focus areas*, are largely undeveloped. Several different land use options have been identified for these areas, including special standards which allow a wider range of land uses or which identify sending and receiving sites for the transfer of development credits (TDC). For focus areas I, II, and III, four land use alternatives have been identified; three alternatives have been identified for focus area IV. Each alternative is designed to address a resource conservation or economic diversification theme. In order to achieve these objectives, different combinations of land use categories and standards are applied to each focus area, and the resulting buildout scenario is projected.

This section of the alternatives analysis compares the land uses for each focus area recommended by the draft Estero Area Plan with a range of alternatives that place varying degrees of emphasis on resource conservation, economic diversification and sustainable development. The potential environmental impacts associated with the alternatives for each focus area are summarized in tables following a description of the various alternatives and their associated impacts. Within the summary tables, the imapcts associated with each alternative are compared with those associated with the proposed draft area plan as either higher, lower or similar. In addition, for each resource category, the summary tables provide a conclusion relative to the significance of the impact, based on the thresholds used throughout this draft EIR.

The location of each focus area is shown on Figure 7-1. The combined acreage for all four focus areas is approximately 737 acres.

Figure 7-1: Focus Area Locations



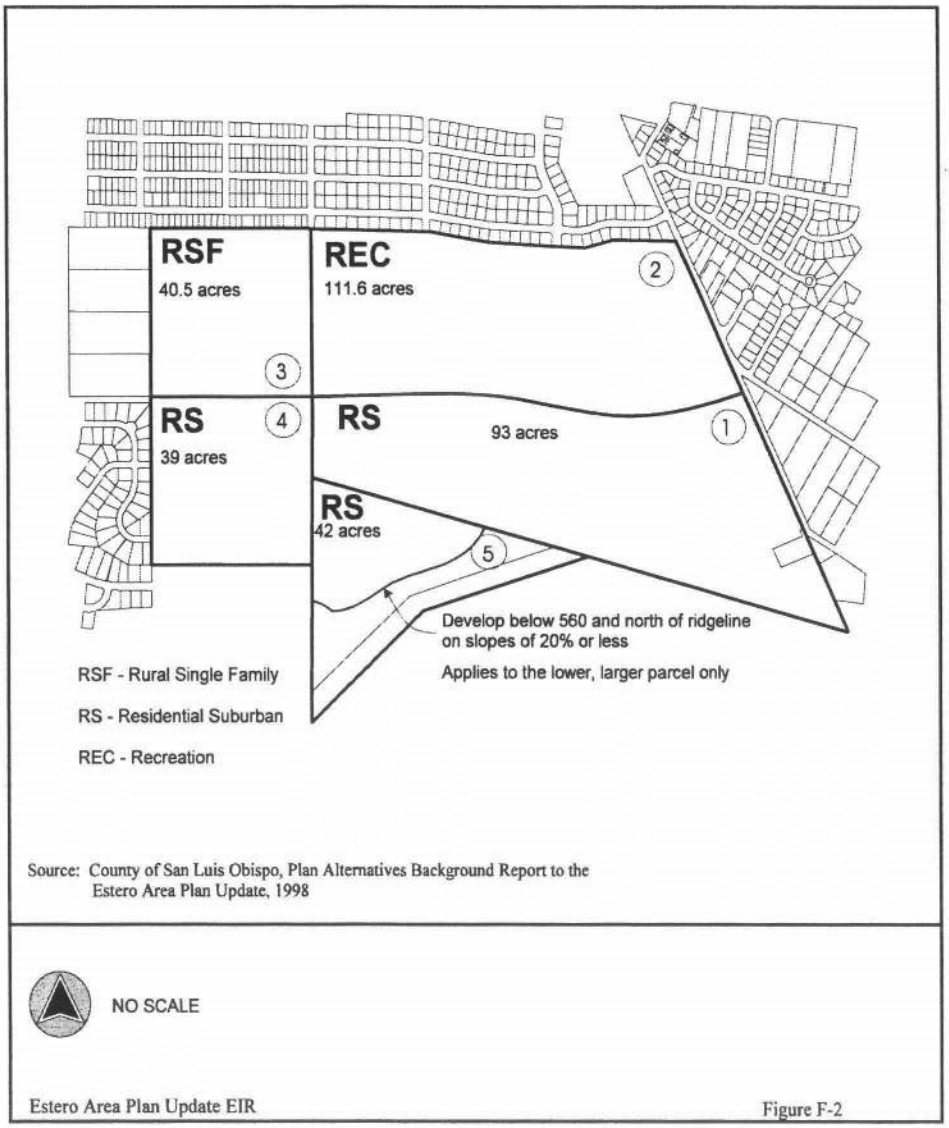
Source: County of San Luis Obispo, Plan Alternatives Background Report to the Estero Area Plan Update, 1998

Source: County of San Luis Obispo, Dept. of Planning & Building, Mapping Division, 1997; Crawford Multari Clark & Mohr, 1997.

Focus Area I

Focus Area I is located on the hillsides south of Highland Drive between Cabrillo Estates and Bayview Heights Drive. This 326-acre area is intended to contain low profile buildings that blend with the natural environment. The draft area plan reduces the residential development potential outlined by the adopted area plan but allows up to 112 lodging units and a conference center, all to be developed at a residential scale. New development is to be generally clustered away from the most environmentally sensitive and scenic areas at the lower elevation of the hills. The northerly portion of the focus area designated for Recreation could support the development of a tourist lodging/conference center. Much of the area is shown as TDC sending sites. Table 7-7 provides a summary of potential environmental consequences associated with buildout of the focus area in accordance with the draft area plan and the four alternatives. Figure 7-2 shows the land uses recommended for the area.

Figure 7-2: Recommended Land Uses for Focus Area I – Draft Area Plan



Alternatives

a. *Alternative I -- No Project/No Development*
Alternative IA -- No Project/Buildout of Adopted Area Plan

Land Use Standards and Densities
Land uses and development standards for these alternatives are those designated by the adopted area plan. These standards provide for some protection of viewsheds within subsections 1, 2, 4 and 5 and encourage clustered development in subsections 3, 4 and 5. Under the No Project/No Development Alternative, the area would remain vacant and no additional development would occur. The No Project/Buildout of Adopted Area Plan Alternative would accommodate 575 single family residential units; an additional 117 units could be accommodated in the Residential Suburban category. Table 7-7 compares buildout potential of these alternatives with that of the draft area plan.

Potential Environmental Impacts
Alternative I would not result in any additional impacts to the environment beyond existing conditions. However, none of the objectives of the proposed Estero Area Plan would be achieved. Alternative IA, however, would accommodate the largest increase in population in the focus area among the four alternatives, with a corresponding increase in traffic, air pollution, water demand, sewage generation and the demand for other public services. Other potential significant impacts could result from the proximity of development to the Los Osos fault, and the potential degradation or desecration of cultural resources. Considering the dire water and sewage situation in the Los Osos area (discussed further in Sections 5.4 "Water Resources" and 5.5 "Wastewater"), implementation of this alternative would result in significant and unavoidable impacts that exceed those associated with the draft area plan if no sewer system is constructed.

b. *Alternative IB – Resource Conservation*

Land Use Standards and Densities
The Resource Conservation Alternative would emphasize the conservation of resources, and would call for the clustering of development away from sensitive areas. This alternative would also result in a substantial decrease in the density of proposed residential development, and the identification of TDC sending and receiving sites. The densities recommended under this alternative are 1 unit per acre on 75 acres below 400'/360' elevation in Area 1, 2 units per acre in Area 3 and 1 unit per acre on 16.5 acres below 400' elevation in Area 4. Development in Areas 1 and 4 would be restricted to below the 400'/360' elevation. Area 2 would be designated a TDC receiving site, and would include a neighborhood park on 1.25 acres with a maximum allowable density of 4 units per acre with the purchase of development credits. Area 5 would serve as a TDC sending site, and would accommodate residential development at a density of 1 dwelling unit per 3 acres. Buildout for Focus Area I under this alternative would accommodate between 173-474 single family residential units in the RSF category, and 83-108 units in the RS/REC category. The range of projected units corresponds to the range of residential densities accommodated in Area 2.

Potential Environmental Impacts
Impacts associated with this alternative are generally less significant than those associated with the draft plan for Focus Area I. This alternative would accommodate a moderate increase in population (637-1,449 people), which would increase the demand for public services within the focus area.

c. *Alternative IC -- Econnomic Diversification*

Land Use Standards and Densities

This alternative includes land designated for a hotel, golf course, convention center complex with associated support services. The majority of the acreage (284.1) would be in the Recreation land use category, with the remaining acreage in the Residential Suburban category. Standards for the entire area would promote natural design and colors; land above the 400 foot contour is designated open space. Reclaimed wastewater is proposed to irrigate the golf course. Areas 1, 2 and 3 would include the golf course/convention center, and the remaining areas would serve as TDC sending sites. Area 4 would either be part of the golf course/convention center complex or would be developed with dwellings at a density of 1 dwelling unit per 3 acres on 16.5 acres all below 400 feet. Area 5 would support clustered housing at a density of 1 dwelling unit per 3 acres; areas 4 and 5 are shown as TDC sending sites. Total buildout potential for the focus area under this alternative is between 0-110 residences and 112 lodging units.

Potential Environmental Impacts

Because of the relatively low population and housing increase associated with this alternative, it represents the least overall impact on water, wastewater and public services. However, it is important to note that the development of a golf course in this area would result in significant impacts on biological resources compared with the draft plan.

Table 7-7: Comparison of Alternatives – Focus Area I

Resources	I. No Project - No Additional Development	IA. No Project - Buildout in Accordance with the Adopted General Plan	IB. Resource Conservation	IC. Economic Diversification	Draft Plan
Buildout Summary					
Population	0	**1,723**	637-1,449	0-274	1,606
Total Potential Dwelling Units (single- and multi-family combined)	0	**692**	256-582	0-110	645
Commercial Floor Area/Motel Units	0	0	0	**112 motel units**	**112 motel units**
Water					
Quantified Impact At Buildout	0	188.2 AFY	158.3 AFY	55-78.1 AFY	**223.6 AFY**
Impact Compared to Draft Area Plan	Lower	Lower	Lower	Lower	--
Significance	Significant and Unavoidable	Significant and Unavoidable	Significant and Unavoidable	Significant and Unavoidable	Significant and Unavoidable
Sewer					
Quantified Impact At Buildout	0	155 AFY	130.4 AFY	49-68 AFY	**187.9 AFY**
Impact Compared to Draft Area Plan	Lower	Lower	Lower	Much lower	--
Significance	Not Significant	Not Significant; assumes Los Osos sewer	Not Significant; assumes Los Osos sewer	Not Significant; assumes Los Osos sewer	Not Significant; assumes Los Osos sewer
Schools					
Quantified Impact At Buildout	0	**448 students**	377 students	16-71 students	417 students
Impact Compared to Draft Area Plan	Lower	**Higher**	Lower	Much lower	--
Significance	Not Significant	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation
Public Services					

Resources	I. No Project - No Additional Development	IA. No Project - Buildout in Accordance with the Adopted General Plan	IB. Resource Conservation	IC. Economic Diversification	Draft Plan
Impact Compared to Draft Area Plan	N/A	**Higher**	**Lower**	Lower	--
Significance	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation
Discussion	These resources consist of sheriff's patrol, fire protection, parks and recreation, libraries, and general government. The county's public facilities fees for new development indicate the relative demands on services, public improvements and community amenities produced by residential single-family, residential multi-family, office, retail, and industrial development. The envisioned hotel, convention center, retreat, restaurant, shops, and golf course clubhouse are considered retail development for purposes of this analysis.				
Geology					
Impact Compared to Draft Area Plan	N/A	**Higher**	Slightly less	Lower	--
Significance	Not Significant	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation
Discussion	The most important consideration is the proximity of residential development to the Los Osos Fault trace that crosses the southern portion of the focus area. T7he policy response of the area plan will reduce potential impacts to a less than significant level.				
Drainage					
Impact Compared to Draft Area Plan	N/A	Similar	Similar	Lower	--
Significance	Not Significant	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation
Discussion	The acreage of impervious surfaces may be an indicator of potential drainage impacts. Golf courses will have the lowest percentage of impervious surface area. Clustered development with at least 40% open space is likely to have a lower percentage of impervious surface area than standard subdivisions. In general, lower density residential development will have less impervious surface area than higher density residential development.				
Biology					
Impact Compared to Draft Area Plan	N/A	**Higher**	Similar	**Higher**	--
Significance	Not Significant	Significant and Unavoidable	Significant and Unavoidable	Significant and Unavoidable	Significant and Unavoidable

Resources	I. No Project - No Additional Development	IA. No Project - Buildout in Accordance with the Adopted General Plan	IB. Resource Conservation	IC. Economic Diversification	Draft Plan
Discussion	All alternatives will disturb coastal sage scrub and maritime chaparral, both highly sensitive vegetation communities. This focus area provides potential habitat for the endangered Morro Shoulderband snail, Morro Bay kangaroo rat, and Indian Knob mountain balm; and the threatened Morro manzanita. Alternatives with greater amounts of contiguous natural open space and preservation of wildlife corridors may allow more opportunities to preserve vegetation and habitat. Residences may have more impacts on biological resources than other types of development. Significant impacts are likely in any case.				
Cultural Resources					
Impact Compared to Draft Area Plan	N/A	**Higher**	Lower	Lower	--
Significance	Not Significant	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation
Discussion	This area may not be highly sensitive with regard to cultural resources. In general, alternatives with more intensive development, especially residential development, and alternatives with greater site disturbance, may be more likely to result in impacts.				
Visual Resources					
Impact Compared to Draft Area Plan	N/A	**Higher**	**Higher**	**Higher**	--
Significance	Not Significant	Significant and Unavoidable	Significant and Unavoidable	Significant and Unavoidable	Significant and Unavoidable
Discussion	This focus area is visually sensitive, and all of the alternatives have the potential to alter the existing open space character of the site and affect views of the site from many locations within and outside of the community. The higher elevations of the site tend to be more sensitive, as they are likely to be more visible and generally have denser vegetation. In addition, a ridgeline is also found at the higher elevations in a portion of the focus area. In general, the more intense the development and the less natural open space, especially at higher elevations, the greater the likelihood of visual impacts.				
Traffic					
Quantified Impact At Buildout	0	699 peak hour trips	588 pht	154-240 pht	**731 pht**
Impact Compared to Draft Area Plan	Lower	Similar	Lower	Much lower	--
Significance	Not Significant	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation
Discussion	Trip generation will be less for all four alternatives when compared with the draft plan. The roadway and intersection improvements recommended by the area plan will accommodate the increase in traffic above current levels while maintaining an acceptable level of service.				
Noise					
Impact Compared to Draft Area Plan	N/A	Similar	Lower	Lower	--

Resources	I. No Project - No Additional Development	IA. No Project - Buildout in Accordance with the Adopted General Plan	IB. Resource Conservation	IC. Economic Diversification	Draft Plan
Significance	Not Significant	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation
Discussion	Where located close to residential uses, the envisioned hotel, golf course, retreat, and associated service vehicles and deliveries may result in noise impacts that need to be mitigated, even though those uses tend to generate less traffic than residential uses. Where residential development is envisioned, however, the total amount of traffic generated may be an indicator of overall noise impacts. Regardless, the policies and standards contained in the area plan and the County's Noise Element will address noise impacts from all four alternatives.				
Air Quality					
Impact Compared to Draft Area Plan	N/A	Similar	Lower	Much lower	--
Significance	Not Significant	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation
Discussion	Trip generation can be used as an indicator of long-term emissions and impacts on air quality. The alternatives that include a golf course, hotel, convention center, and retreat could attract visitors from other areas, thereby increasing the length of vehicle trips. However, the effects of possible increases in trip length on emissions are speculative, and are not factored into the rankings.				
Land Use Compatibility					
Impact Compared to Draft Area Plan	N/A	Slightly Lower	Slightly Lower	Similar	--
Significance	Not Significant	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation
Discussion	Potential impacts associated with land use compatibility may occur when different land uses are located in close proximity. The retreat/resort/conference and hotel/conference center may be of concern if located adjacent to residential uses. The hotel/conference center, although more intense than the retreat/resort, would be developed as part of a golf course under Alternative IC. That could offer opportunities to provide a large open space buffer adjacent to residences. Potential compatibility concerns can often be reduced by careful design, including use of landscaped buffer areas between different land uses.				
Ranking of Alternatives: 1 being least impact, 5 being greatest impact	1	5	3	2	4

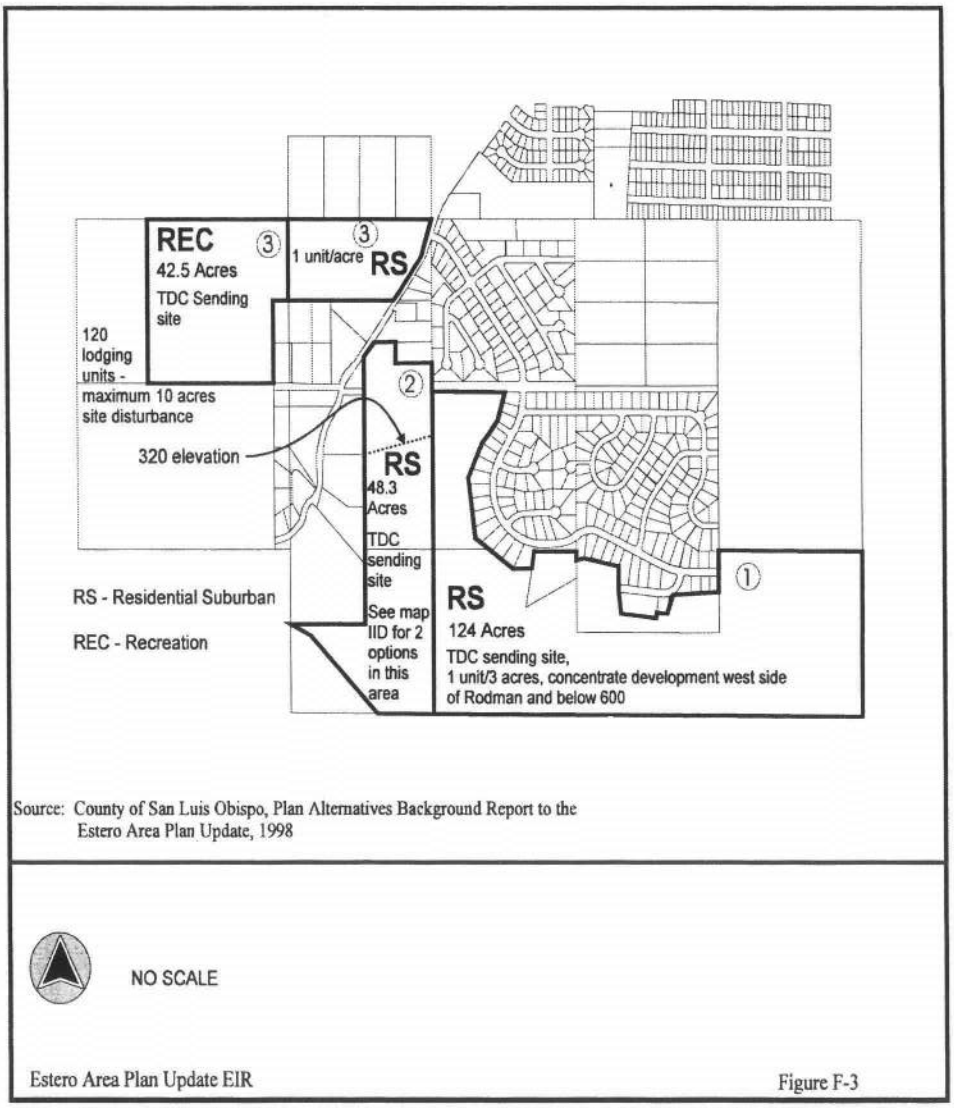
Environmental impacts are for each alternative are compared with those associated with the draft plan as either higher, lower or similar in magnitude. Estimates of relative environmental impacts are made at a program, not project-level in the absence of project-specific information; when actual projects are proposed in the future, additional environmental review will be needed. The possibility of community sewage disposal facilities within or next to this focus area is not addressed. Where different uses are possible in a given area, the range of estimated resource demands is shown; where TDCs are allowable, the maximum amount of residential development is assumed.

AFY Acre-feet per year; environmental impacts based on uses producing highest water demand and wastewater flows.

Focus Area II

Focus Area II encompasses a total of 231 acres south and west of Cabrillo Estates and west of Pecho Valley Road. In the draft plan, densities and development standards are adjusted to make development more environmentally sensitive, primarily by shifting development potential to lower, less visually sensitive areas. TDC sending sites are proposed to transfer potential development away from the upper hillsides, and away from the western portion nearest the sandspit. As with Focus Area I, the draft plan calls for buildings on the hillsides to have a low profile that follows the natural slope, and subdued colors that blend with the natural terrain. In addition, standards for the Recreation category in Subarea 3 have been revised to increase the allowable number of lodging units, limit the area of site disturbance to ten acres, and preclude residential development. Table 7-8 provides a summary of the potential environmental consequences associated with buildout of the focus area in accordance with the draft area plan and the four alternatives.

Figure 7-3: Recommended Land Uses for Focus Area II – Draft Plan



Source: County of San Luis Obispo, Plan Alternatives Background Report to the Estero Area Plan Update, 1998

Source: County of San Luis Obispo, Dept. Of Planning & Building, Mapping Division, 1997; Crawford Multari Clark & Mohr, 1997.

Alternatives

a. Alternative II – No Project/No Development, and
Alternative IIA – No Project Buildout of Adopted Area Plan

Land Use Standards and Densities
The No Project/No Development Alternative would not result in any further impacts to the environment beyond existing conditions. However, none of the objectives of the Proposed Estero Area Plan would be achieved. The No Project/Buildout of Adopted Area Plan alternative would maintain the land use categories of the adopted area plan, and would have a buildout of between 147 - 154 dwelling units and/or as many as 72 lodging units. Residential densities would range from 1 unit per 3 acres. Development standards would encourage ecological and visual preservation through the use of clustering, and maintaining a maximum of 60 percent open space with no development on slopes greater than 20% for Areas 1 and 2. The eastern 17 acre portion of Area 3 would support clustered single family residential development at a density of 1 unit per acre, with 60 percent open space (on the eastern 17 acres) and the potential to receive development transfered from the REC parcel to the west. A height limit of 22 feet would be placed on this area. Area 3 would also contain land designated REC with either single family housing at a density of 1 unit per acre on the area not used for lodging and/or a lodge at a density of 12 units per acre on a maximum of 8 acres.

Potential Environmental Impacts
The No Project/Buildout of Adopted Area Plan Alternative would accommodate the greatest increase in population for Focus Area II compared with the draft plan, and would result in correspondingly higher impacts associated with traffic, air pollution, water and sewer service and other public services. This alternative would have similar impacts as compared with the Economic Diversification alternative.

b. Alternative IIB – Natural Resource Conservation

The Natural Resource Conservation Alternative emphasizes the use of environmentally sensitive development patterns. Development at buildout would accommodate 89 dwelling units and/or as many as 72 lodging units. Under this alternative, Area 1 would be designated Residential Suburban and would be a TDC sending site. Development would be restricted to 1 unit/3 acres and would be concentrated on the west side of the parcel above Rodman Dr. Additionally, no development would be allowed east of, or higher than, the existing Cabrillo Estates and a road connection would be made to the west.

Area 2 would also be designated RS with the upper 25 acres acting as a TDC sending site and the lower 23 acres a TDC receiver. As part of this arrangement, if both parcels were under the same ownership, all development on the lower parcel would be restricted to 1 unit/acre. If under separate ownership, the same development potential would exist only if density was transferred from the upper to lower parcel through the TDC process.

Area 3 would be designated Recreation and the western 42-acre parcel would act as a TDC sender; the eastern 17-acre parcel would serve as a TDC receiver. If both parcels are under the same ownership, all development would be restricted to the 17-acre parcel at 2 units/acre, with no clustering required. If under separate ownership, the same number of units would be allowed in the entire area. Lodging development could occur consistent with the standards described above for the No Project – Existing Plan Alternative.

Potential Environmental Impacts
Population at buildout under this alternative is estimated to be about 222 people, which is comparable to the draft area plan. The only significant impact expected is to related to geology as result of proximity to the Los Osos fault, and possible slope instability.

c. Alternative IIC -- Economic Diversification.

This alternative seeks to promote economic development opportunities for the community. It would accommodate a greater increase in population, with between 127 - 134 dwelling units, depending on the amount of lodging, but with greater emphasis on recreational or visitor-serving uses. Area 1 would remain the same as in the No Project - Existing Plan alternative, while Area 2 would accommodate a lodging facility.

Area 2 would be divided between Residential Suburban and Recreation. The REC portion of the parcel (the lower 10 acres of the 23.3-acre parcel below 320' elevation) would support up to 20 small-scale, low profile, motel units/cottages and a restaurant with a residential character near Pecho Valley Road. This area would also contain a small park and three single-family residential parcels on five acres below the 320 foot elevation. The upper 13.3 acres of the 23.3-acre parcel would remain as open space. The upper 25-acre parcel in Area 2 would be included in the RS, Residential Suburban category and would have the same standards as Areas 1 and 2, as discussed in Alternative IIA. Additionally, new land divisions would be required to minimize site disturbance by concentrating development on the most gently-sloping terrain.

Area 3 would contain three designations. The western 42 acres would be designated REC subject to the same standards and requirements as those discussed in the No Project- Existing Plan alternative. The easternmost five acres of the 17-acre parcel adjacent to Pecho Valley Road would also be designated REC and would support up to 20 small-scale, low profile, motel units/cottages with residential character and a recreation area or park. Lastly, the westerly 12 acres of the 17-acre parcel would be designated for the same uses and standards as in the No Project - Existing Plan alternative.

Total units at buildout would be 127 to 134 (depending on the amount of lodging that was developed) and up to 102 lodging units.

Potential Environmental Impacts

This alternative would support between 316-334 people at buildout, considerably higher than the draft plan. Impacts related to water demand, sewage generation, increased impacts to schools and public services, traffic and air pollution would increase compared with the draft plan. Buildout of visitor-serving uses would result in visual impacts, increased noise, and potential incompatibilities with surrounding residential neighborhoods.

Table 7-8: Comparison of Alternatives – Focus Area II

Resources	II. No Project - No Additional Development	IIA. No Project - Buildout in Accordance with the Adopted General Plan	IIB. Resource Conservation	IIC. Economic Diversification	Draft Plan
Buildout Summary					
Population	0	**366-383**	222	316-334	219
Total Potential Dwelling Units (single- and multi-family combined)	0	**147-154**	89	127-134	88
Commercial Floor Area/Motel Units	0	72 motel units	72 motel units	102 motel units	**90 motel units**
Water					
Quantified Impact At Buildout	0	**41.9-49.4 AFY**	33.6 AFY	**41.8-49.3 AFY Higher**	35.6 AFY
Impact Compared to Draft Area Plan	Lower	**Higher**	Lower	**Higher**	--
Significance	Significant and Unavoidable	Significant and Unavoidable	Significant and Unavoidable	Significant and Unavoidable	Significant and Unavoidable
Sewer					
Quantified Impact At Buildout	0	**34.5-41.4 AFY**	28.4 AFY	**34.9-41.7 AFY**	30.2 AFY
Impact Compared to Draft Area Plan	Lower	**Higher**	Lower	**Higher**	--
Significance	Not Significant	Not Significant; assumes Los Osos sewer	Not Significant; assumes Los Osos sewer	Not Significant; assumes Los Osos sewer	Not Significant; assumes Los Osos sewer
Schools					
Quantified Impact At Buildout	0	95-100	58	82-87	57
Impact Compared to Draft Area Plan	Lower	Higher	Similar	Higher	--
Significance	Not Significant	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation
Public Services					

Resources	II. No Project - No Additional Development	IIA. No Project - Buildout in Accordance with the Adopted General Plan	IIB. Resource Conservation	IIC. Economic Diversification	Draft Plan
Impact Compared to Draft Area Plan	N/A	**Higher**	Similar	**Higher**	--
Significance	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation
Discussion	These resources consist of sheriff's patrol, fire protection, parks and recreation, libraries, and general government. The county's public facilities fees for new development indicate the relative demands on services, public improvements and community amenities produced by residential single-family, residential multi-family, office, retail, and industrial development. The envisioned lodging facilities are considered retail development.				
Geology					
Impact Compared to Draft Area Plan	N/A	Lower	Similar	Lower	--
Significance	Not Significant	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation
Discussion	An important consideration is the proximity of residential development to the Los Osos Fault trace that crosses Areas 1 and 2 in the focus area. Another consideration is the likelihood of development on steeper slopes. The standards in Alternatives IIA, and C are likely to result in development on slopes less than 20%, which reduces the likelihood of slope stability concerns.				
Drainage					
Impact Compared to Draft Area Plan	N/A	**Higher**	**Higher**	**Higher**	--
Significance	Not Significant	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation
Discussion	The acreage of impervious surfaces may be an indicator of potential drainage impacts. Clustered development with higher percentages of natural open space is likely to have a lower percentage of impervious surface area than standard subdivisions. Another consideration is the likelihood of development on steeper slopes, which could increase potential for drainage concerns.				
Biology					
Impact Compared to Draft Area Plan	N/A	**Higher**	**Higher**	**Higher**	--
Significance	Not Significant	Significant and Unavoidable	Significant and Unavoidable	Significant and Unavoidable	Significant and Unavoidable

Resources	II. No Project - No Additional Development	IIA. No Project - Buildout in Accordance with the Adopted General Plan	IIB. Resource Conservation	IIC. Economic Diversification	Draft Plan
Discussion	All alternatives are will disturb coastal sage scrub and maritime chaparral, both highly sensitive vegetation communities. This focus area provides potential habitat for the endangered Morro Shoulderband snail, Morro Bay kangaroo rat, and Indian Knob mountain balm (although none were found in a survey of Area 1); and the threatened Morro manzanita. This focus area also contains highly sensitive coastal dune scrub and oak woodland vegetation communities, but concentrating or clustering development as envisioned in each alternative can probably avoid impacts to those communities. In general, alternatives with greater amounts of contiguous natural open space and preservation of wildlife corridors may allow more opportunities to preserve vegetation and habitat. Residences may have more impacts on biological resources than other types of development. Significant impacts are likely in any case.				
Cultural Resources					
Impact Compared to Draft Area Plan	N/A	Similar	Similar	Similar	--
Significance	Not Significant	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation
Discussion	This focus area may not be not highly sensitive with regard to cultural resources. In general, more compact development that involves less site disturbance (as can be indicated by greater amounts of open space) may have less potential for impacts. In general, residential development may be more likely to result in impacts than other uses such as lodging.				
Visual Resources					
Impact Compared to Draft Area Plan	N/A	**Higher**	Similar	**Higher**	--
Significance	Not Significant	Significant and Unavoidable	Significant and Unavoidable	Significant and Unavoidable	Significant and Unavoidable
Discussion	This focus area is visually sensitive. The higher elevations are visible from many locations within and outside of the community, and contain scenic, vegetated slopes and a prominent ridgeline. The open areas west of Pecho Valley Road are highly visible from the road and offer views of the dunes. Each alternative has the potential to alter the existing open space character of the area and affect views of the site from many locations. In general, the alternatives that concentrate development at lower elevations near existing development, preserve more natural open space, and have less intensive development near Pecho Valley Road, are less likely to result in visual impacts.				
Traffic					
Quantified Impact At Buildout	0	**156-192 peak hour trips**	133 pht	**155-191 pht**	143 pht
Impact Compared to Draft Area Plan	Lower	**Higher**	Lower	**Higher**	--
Significance	Not Significant	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation

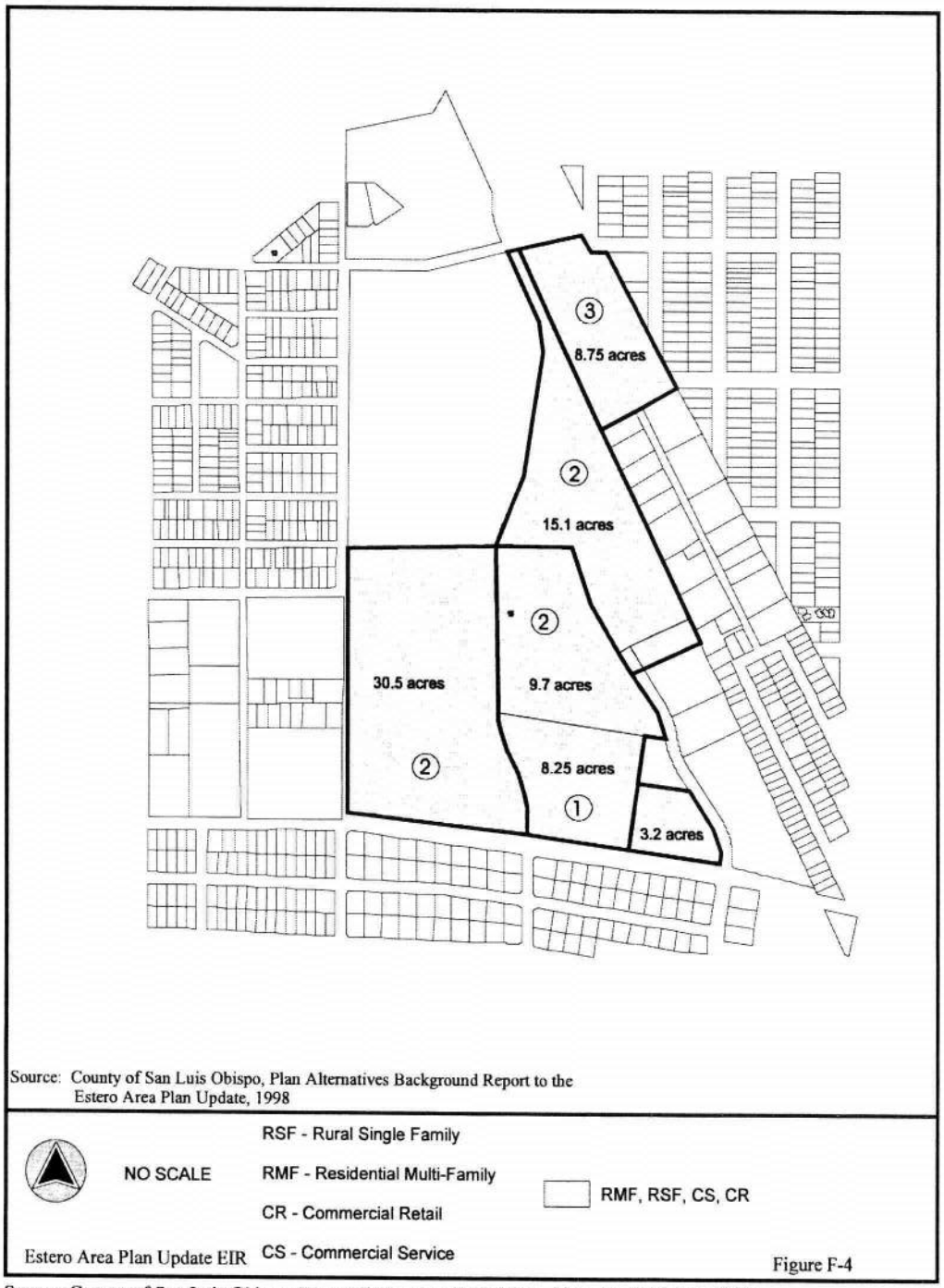
Resources	II. No Project - No Additional Development	IIA. No Project - Buildout in Accordance with the Adopted General Plan	IIB. Resource Conservation	IIC. Economic Diversification	Draft Plan
Discussion	Trip generation will be higher for the Existing Estero Area Plan and Economic Diversification alternatives when compared with the draft plan. However, the roadway and intersection improvements recommended by the area plan will accommodate the increase in traffic above current levels while maintaining an acceptable level of service.				
Noise					
Impact Compared to Draft Area Plan	N/A	**Higher**	Lower	**Higher**	--
Significance	Not Significant	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation
Discussion	Where located close to residential uses, the envisioned small-scale motel units may result in noise impacts that need to be mitigated, even though those uses tend to generate less traffic than residential uses. Where residential development is envisioned, however, the total amount of traffic generated may be an indicator of overall noise impacts.				
Air Quality					
Impact Compared to Draft Area Plan	N/A	**Higher**	Lower	**Higher**	--
Significance	Not Significant	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation
Discussion	Trip generation can be used as an indicator of long-term emissions and impacts on air quality. The alternatives that include more lodging could attract more visitors from other areas, thereby increasing the length of vehicle trips. However, the effects of possible increases in trip length on emissions are speculative, and are not factored into the rankings.				
Land Use Compatibility					
Impact Compared to Draft Area Plan	N/A	Similar	Similar	**Slightly higher**	--
Significance	Not Significant	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation
Discussion	Potential impacts associated with land use compatibility may occur when different land uses are located in close proximity. Since each alternative proposes only low density single-family residential development, the primary compatibility concern is development of hotels/motels adjacent to residential uses. Such concerns can often be reduced by careful design, including use of landscaped buffer areas between different land uses.				
Ranking of Alternatives: 1 being least impact, 5 being greatest impact	1	4	2	5	3

Resources	II. No Project - No Additional Development	IIA. No Project - Buildout in Accordance with the Adopted General Plan	IIB. Resource Conservation	IIC. Economic Diversification	Draft Plan
Environmental impacts are for each alternative are compared with those associated with the draft plan as either higher, lower or similar in magnitude. Estimates of relative environmental impacts are made at a program, not project-level in the absence of project-specific information; when actual projects are proposed in the future, additional environmental review will be needed. Where different uses are possible in a given area, the range of estimated resource demands is shown; where TDCs are allowable, the maximum amount of residential development is assumed. AFY Acre-feet per year; environmental impacts based on uses producing highest water demand and wastewater flows.					

Focus Area III

Focus Area III consists of 75.5 acres which comprise the Morro Shores Mixed Use Area in the central part of Los Osos. The draft area plan recommends preparation of a specific plan prior to development of this mixed use area which is included in the Single- and Multi-Family Residential, Commercial Retail, and Service Commercial land use categories (RMF, RSF, CR and CS). The specific plan is to include one or more multi-use business parks and residential uses that provide opportunities for affordable and senior citizen housing. The multi-use business parks are intended for non-polluting light manufacturing/assembly uses (particularly research and development, and high technology). The business parks would also be campus-like and compatible with surrounding residential neighborhoods, and have a recreation area for public use. The specific plan is to include a minimum amount of medium and medium-to-high density residential development and include a density bonus for senior citizen housing. The specific plan may include other uses as well: neighborhood commercial/residential mixed use, a community services center, low density residential, and wastewater treatment ponds/park/recreational space as part of a community sewer system. South of Ramona Avenue, an 8.8-acre area could be developed with residential units (at between 8 and 10 units/acre), and up to 98 lodging units with accessory eating and drinking places. Table 7-9 provides a summary of the potential environmental consequences associated with buildout of the focus area in accordance with the draft area plan and the four alternatives. Recommended land uses are shown on Figure 7-4.

Figure 7-4: Recommended Land Use Categories for Focus Area III – Draft Plan



Source: County of San Luis Obispo, Dept. Of Planning & Building, Mapping Division, 1997; Crawford Multari Clark & Mohr, 1997

Alternatives

a. Alternative III - No Project/No Development

Land Use Standards and Densities

The majority of this focus area is designated for single- or multi- family residential use at a variety of densities. Residential single family is allowed with a minimum parcel size of 6,000 square feet, and multi-family development is allowable at a density of up to 26 units per acre in a 9.7-acre portion of Area 2; up to 10 units per acre elsewhere in Areas 2 and 3. Up to 6 units per building are allowed, with a 65 percent maximum site coverage.

An additional portion of this focus area (Area 1) is designated for commercial retail development with neighborhood uses allowable. No dwellings are permitted except for caretaker residences. A small portion of Area 1 is also included in the Office and Professional category.

Potential Environmental Impacts

Potential environmental impacts associated with the No Project/No Additional Development alternative would be consistent with existing conditions. However, none of the objectives of the proposed Estero Area Plan for this focus area would be achieved.

b. Alternative IIIA – No Project/Buildout of Adopted Area Plan

Land Use Standards and Densities

Allowable land uses and densities for this alternative are the same as for Alternative III discussed above. Projected development at buildout would include approximately 80,900 sq. ft. of retail commercial, 56,600 sq. ft. of office professional, and about 659 dwelling units.

Environmental Impacts -

This alternative would accommodate the highest increase in population for this focus area among the four alternatives (approximately 1,641 people). Impacts associated with population increases include water demand, sewage generation, impacts to schools and public services, impacts on drainage, biology, and cultural resources, and increased traffic, noise and air pollution.

c. Alternative IIIB -- Resource Conservation

Land Use Standards and Densities

Under the Resource Conservation Alternative, allowable development would include a multi-use business park with offices, light manufacturing, assembly, and supporting facilities. The retail commercial area would support neighborhood, employee-serving uses and residential mixed use. Areas designated Recreation would support lodging and multi-family uses at densities of between 8- 10 units per acre. Recreation uses within this category would include hotels, motels, B&Bs, and accessory restaurants. Buildout associated with this alternative would result in an additional 314,100 sq. ft. of business park development, 31,400 sq. ft. of retail and 205 dwelling units, in addition to 98 lodging units.

Potential Environmental Impacts

Buildout associated with the Resource Conservation alternative could accommodate an additional 314-510 people. Associated impacts would include increased demand for water and sewer, traffic, air pollution, noise and impacts to biological resources, and incompatibilities with surrounding land uses.

d. Alternative IIIC – Economic Diversification

Land Use Standards and Densities

The Economic Diversification alternative is aimed at promoting economic development in the community. This alternative would greatly expand the amount of land designated for Commercial Service development which would be used for a multi-use business park as described in Alternative IIIB. The business park would include 20 acres for open space or recreation with public access. A small portion of the focus area would be designated Office/Professional to support office uses (no residential) and a future civic center. The small amount of multi-family residential in this alternative is would be developed at a density of up to 10 units per acre. Buildout of the focus area under this alternative would support 613,100 sq. ft. of multi-use business park, 36,600 sq. ft. of office professional, 88 residential units, and 98 lodging units.

Potential Environmental Impacts

The economic diversification alternative could support between 22-219 people in the focus area, a relatively small increase above existing (1994) conditions and much less than that supported by the draft plan. The majority of the impacts associated with this alternative would come from visual impacts associated with commercial buildings, traffic, noise, poorer air quality and land use incompatibilities.

Table 7-9: Comparison of Alternatives – Focus Area III

Resources	III. No Project - No Additional Development	IIIA. No Project - Buildout in Accordance with the Adopted General Plan	IIIB. Resource Conservation	IIIC. Economic Diversification	Draft Plan
Buildout Summary					
Population	0	**1,641**	314-510	22-219	1,115-1,312
Total Potential Dwelling Units (single- and multi-family combined)	0	**659**	205	88	527
Commercial Floor Area/Motel Units	0	137,500 sq.ft.	345,500 sq.ft. 98 motel units	**649,700 sq.ft.** **98 motel units**	280,100 98 motel units
Water					
Quantified Impact At Buildout	0	**227.9 AFY**	121.8-130.6 AFY	127.6-136.4 AFY	182.8-185.9 AFY
Impact Compared to Draft Area Plan	Lower	**Higher**	Lower	Lower	--
Significance	Not Significant	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation
Sewer					
Quantified Impact At Buildout	0	**207.8 AFY**	109.6-115.8 AFY	117.9-124.1 AFY	171.2-177.1AFY
Impact Compared to Draft Area Plan	Lower	**Higher**	Lower	Lower	--
Significance	Not Significant	Not Significant; assumes Los Osos sewer	Not Significant; assumes Los Osos sewer	Not Significant; assumes Los Osos sewer	Not Significant; assumes Los Osos sewer

Resources	III. No Project - No Additional Development	IIIA. No Project - Buildout in Accordance with the Adopted General Plan	IIIB. Resource Conservation	IIIC. Economic Diversification	Draft Plan
Schools					
Quantified Impact At Buildout	0	**317 students**	73-124 students	6-57 students	187-208 students
Impact Compared to Draft Area Plan	Lower	**Higher**	Lower	Lower	--
Significance	Not Significant	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation
Public Services					
Impact Compared to Draft Area Plan	N/A	**Higher**	Lower	Lower	--
Significance	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation
Discussion	These resources consist of sheriff's patrol, fire protection, parks and recreation, libraries, and general government. The county's public facilities fees for new development indicate the relative demands on services, public improvements and community amenities produced by residential single-family, residential multi-family, office, retail, and industrial development. The estimated number of employees/1,000 ft^2 in the envisioned multi-use business parks is more similar to the number for retail development, so the public facilities fees for retail are used in the case of the business parks.				
Geology					
Impact Compared to Draft Area Plan	N/A	Higher	Lower	Lower	--
Significance	Not Significant	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation
Discussion	There is disagreement among experts about the existence of the Los Osos Fault trace along the eastern boundary of the focus area. If it exists, a key consideration would be the proximity of residential development to the fault trace.				

Resources	III. No Project - No Additional Development	IIIA. No Project - Buildout in Accordance with the Adopted General Plan	IIIB. Resource Conservation	IIIC. Economic Diversification	Draft Plan
Drainage					
Impact Compared to Draft Area Plan	N/A	**Higher**	Lower	Lower	--
Significance	Not Significant	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation
Discussion	The acreage of impervious surfaces may be an indicator of potential drainage impacts. Lower percentages of impervious surface area may be found in parks and open space, in a "campus-like" business park with landscaped open areas, and in lower density residential development.				
Biology					
Impact Compared to Draft Area Plan	N/A	Similar	Similar	Similar	--
Significance	Not Significant	Significant and Unavoidable	Significant and Unavoidable	Significant and Unavoidable	Significant and Unavoidable
Discussion	All alternatives are likely to result in disturbance of coastal sage scrub, a highly sensitive vegetation community, and potential habitat for the endangered Morro Shoulderband snail. Alternatives with greater amounts of open space may allow more opportunities to preserve this vegetation and habitat. Residences may have more impacts on biological resources than other types of development.				
Cultural Resources					
Impact Compared to Draft Area Plan	N/A	Similar	Similar	Similar	--
Significance	Not Significant	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation
Discussion	This area may not be highly sensitive regarding cultural resources. In general, alternatives that involve more intensive development, especially residential development, and greater site disturbance, may be more likely to result in impacts.				
Visual Resources					
Impact Compared to Draft Area Plan	N/A	Similar	Similar	Similar	--
Significance	Not Significant	Significant and Unavoidable	Significant and Unavoidable	Significant and Unavoidable	Significant and Unavoidable
Discussion	Visually, this focus area is not as sensitive as others. However, all of the alternatives have the potential to alter the existing open space character of the site and affect views of the site and bay from Los Osos Valley Road. In general, more intense development and higher buildings, especially near Los Osos Valley Road, are more likely to cause visual impacts.				
Traffic					

Resources	III. No Project - No Additional Development	IIIA. No Project - Buildout in Accordance with the Adopted General Plan	IIIB. Resource Conservation	IIIC. Economic Diversification	Draft Plan
Quantified Impact At Buildout	0	**1366 peak hour trips**	892-913 pht	1,027-1,048 pht	1,051-1,072 pht
Impact Compared to Draft Area Plan	Lower	**Higher**	Lower	Similar	--
Significance	Not Significant	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation
Discussion	Trip generation will be higher for the Existing Estero Area Plan alternative when compared with the draft plan. However, the roadway and intersection improvements recommended by the area plan will accommodate the increase in traffic above current levels while maintaining an acceptable level of service.				
Noise					
Impact Compared to Draft Area Plan	N/A	Higher	Lower	Similar	--
Significance	Not Significant	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation
Discussion	Noise impacts on residential uses from delivery trucks associated with a multi-use business park and commercial development may be a concern, and would need to be mitigated. In general, the total amount of traffic generated may be an indicator of overall noise impacts. The types of uses envisioned in the multi-use business park (research and development, offices, high-technology industries, and associated warehousing) are not likely to cause significant, unavoidable noise impacts. Potential noise impacts associated with the proposed advanced, integrated wastewater ponding system and community park in the Draft Plan would need to be further investigated.				

Resources	III. No Project - No Additional Development	IIIA. No Project - Buildout in Accordance with the Adopted General Plan	IIIB. Resource Conservation	IIIC. Economic Diversification	Draft Plan
Air Quality					
Impact Compared to Draft Area Plan	N/A	**Higher**	Lower	Similar	--
Significance	Not Significant	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation
Discussion	Trip generation can be used as an indicator of long-term emissions and impacts on air quality. Since the multi-use business parks are envisioned to consist of "clean," high-technology industries and other primarily low-polluting uses, air quality impacts from those uses are not expected to be highly significant. Moreover, business park uses, by affording opportunities for local employment, may actually help reduce air quality impacts by reducing commuting to work. However, since these benefits are speculative, they are not factored into the rankings. Potential air quality concerns associated with the proposed advanced, integrated wastewater ponding system in the Draft Plan would need to be further investigated.				
Land Use Compatibility					
Impact Compared to Draft Area Plan	N/A	Lower	Similar	Similar	--
Significance	Not Significant	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation
Discussion	Potential impacts associated with land use compatibility may occur when different land uses are located in close proximity. Of greatest concern is the location of the following land uses adjacent to existing and proposed residential development (in order of most to least concern): the proposed advanced, integrated wastewater ponding system (in the Draft Plan); multi-use business parks; commercial development; lodging; and community park. Of somewhat lesser concern is the location of high density residential adjacent to low density residential development. Potential compatibility concerns can often be reduced by careful design, including appropriate location and screening of loading and delivery areas, and use of landscaped buffer areas between different land uses.				
Ranking of Alternatives: 1 being least impact, 5 being greatest impact	1	5	2	3	4

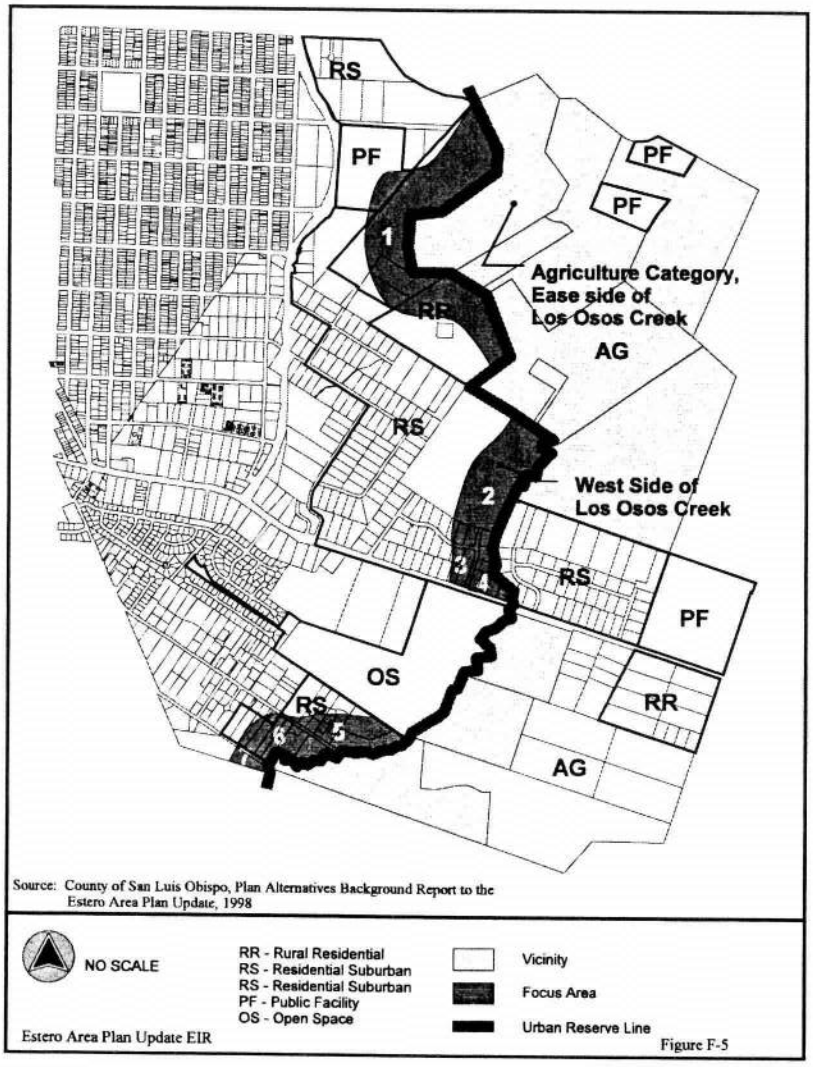
Environmental impacts are for each alternative are compared with those associated with the draft plan as either higher, lower or similar in magnitude. Estimates of relative environmental impacts are made at a program, not project-level in the absence of project-specific information; when actual projects are proposed in the future, additional environmental review will be needed. Where different uses are possible in a given area, the range of estimated resource demands is shown; where TDCs are allowable, the maximum amount of residential development is assumed.

AFY Acre-feet per year; environmental impacts based on uses producing highest water demand and wastewater flows.

Focus Area IV and Vicinity

This area covers most of the Los Osos Creek corridor within and adjacent to the urban reserve line. Several properties within the Agriculture land use category are considered in connection with this focus area. Proposed standards in the draft area plan specify setbacks to locate development away from the sensitive creek habitat or riparian area. New land divisions are to concentrate or cluster development in the least environmentally sensitive locations outside a 100-foot riparian setback. A 2.5 acre minimum parcel size is established for new land divisions in the "Creekside Area" north of Los Osos Valley Road that abut Los Osos Creek. The draft plan for this focus area also encourages permanent protection of agriculture and sensitive habitats through a variety of measures that include: establishing TDC sending sites for parcels adjacent to the creek inside and outside the urban reserve line; streamlining the development review process for projects that protect sensitive habitat; acquisition of conservation easements; and by offering a modest density bonus for new land divisions that dedicate conservation easements. Table 7-10 provides a summary of the potential environmental consequences associated with buildout of the focus area in accordance with the draft area plan and the three alternatives. Figure 7-5 shows the recommended land use categories.

Figure 7-5: Recommended Land Use Categories for Focus Area IV and Vicinity – Draft Plan



Alternatives

a. Alternatives IV and IVA – No Project/No Development

Land Use Standards and Densities

The No Project/No Development Alternative would not result in any additional environmental impacts in Focus Area IV beyond those associated with present conditions (27 dwelling units). For all areas designated Residential Suburban, the following standards would apply:

- The minimum building setback is 50' from riparian areas along Los Osos Creek and Eto Lake.
- Special "S" uses are prohibited adjacent to Los Osos Creek except: ag accessory structures; animal raising and keeping; home occupations; residential accessory uses; and others.

Special standards exist for particular parcels in this focus area. In Area 1, APN 067-011-033 (Powell) requires a specific plan which must address at least the following:

- A habitat study and species analysis, especially regarding the Morro Bay Kangaroo Rat; a 100' buffer from sensitive habitat, and clustered development in the southern portion of the site across from Sage Ave. The amount, intensity, type, and location of development is dependent upon the habitat study.
- Septic, stormwater drainage systems are not to significantly disturb habitat or groundwater.
- An open space or conservation easement is required on Kangaroo Rat habitat.

Land designated Residential Suburban in Area 5 must comply with the following standards:

- A 1-acre minimum parcel size in new land divisions is required.
- APN 074-325-026: 5-acre minimum parcel size in new land divisions.

Land in Area 6 designated has a minimum parcel size of 2.5 acres in new land divisions, except for APNs 074-326-009,010, and 011, which have a 5-acre minimum parcel size. The portion of Area 6 designated for single family residential development (APN 074-326-015) has a 1-acre minimum parcel size in new land divisions.

Buildout under the existing Estero Area Plan alternative would be 125 units (inclusive of 27existing units).

Potential Environmental Impacts

Any development in this area would be at the expense of potential habitat for special status plant and/or animal species.

b. Alternative IVB – Resource Conservation

Land Use Standards and Densities

This alternative is designed to maximize resource conservation in this focus area. Under this alternative all sub-areas would be subject to the following standards:

- The establishment of a strong policy to not expand the Los Osos URL beyond existing limits.
- The establishment of a 600'-1,000' wide buffer (depending on environmental review) on the west side of Los Osos Creek along the URL boundary (assume 600').
- A minimum parcel size of ten acres for new land divisions in the buffer area.
- The concentration or clustering of development outside of the buffer area, where feasible.
- Encourage agriculture outside buffer; require 50' creek setback for "crop production and grazing."
- The designation of all vacant parcels as TDC senders:
  Area 1: RR: 067-011-033,041,045
  Area 2: RS

Area 3: RS: 074-362-001, 074-363-018
Area 6: RS: 074-326-042,044
Area 6: RSF: 074-326-015

Buildout would accommodate 114 dwelling units.

Environmental Impacts

Although any development in this focus area would be at the expense of potential habitat for special status plant and/or animal species, this alternative would provide the most protection.

Table 7-10: Comparison of Alternatives – Focus Area IV

Resources	IV. No Project - No Additional Development	IVA. No Project - Buildout in Accordance with the Adopted General Plan	IVB. Resource Conservation	IVD. Draft Plan
Buildout Summary				
Population	0	**311**	284	**311+**
Total Potential Dwelling Units (single- and multi-family combined)	27	**125**	114	**125**
Commercial Floor Area/Motel Units	0	0	0	0
Water				
Quantified Impact At Buildout	7 AFY	**34 AFY**	31 AFY	**34+ AFY**
Impact Compared to Draft Area Plan	Lower	Similar	Lower	--
Significance	Significant and Unavoidable	Significant and Unavoidable	Significant and Unavoidable	Significant and Unavoidable
Sewer				
Quantified Impact At Buildout	6 AFY	**28 AFY**	25.5 AFY	**28+ AFY**
Impact Compared to Draft Area Plan	Lower	Similar	Lower	--
Significance	Not Significant	Not Significant; assumes Los Osos sewer	Not Significant; assumes Los Osos sewer	Not Significant; assumes Los Osos sewer
Schools				
Quantified Impact At Buildout	17 students	81 students	74 students	81 students
Impact Compared to Draft Area Plan	Lower	Similar	Lower	--
Significance	Not Significant	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation
Public Services				
Impact Compared to Draft Area Plan	N/A	Similar	Slightly Lower	--
Significance	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation

Resources	IV. No Project - No Additional Development	IVA. No Project - Buildout in Accordance with the Adopted General Plan	IVB. Resource Conservation	IVD. Draft Plan
Discussion	These resources consist of sheriff's patrol, fire protection, parks and recreation, libraries, and general government. The county's public facilities fees for new development indicate the relative demands on services, public improvements and community amenities produced by residential single-family, residential multi-family, office, retail, and industrial development.			
Geology				
Impact Compared to Draft Area Plan	N/A	**Higher**	Lower	--
Significance	Not Significant	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation
Discussion	In this focus area, the primary consideration is liquefaction. In general, a moderate-to-high potential for liquefaction exists near Los Osos Creek on alluvial soils, as mapped in the Seismic Safety Element. In general, development that is located at least 600 feet from Los Osos Creek may have a lower potential for liquefaction.			
Drainage				
Impact Compared to Draft Area Plan	N/A	**Higher**	Lower	--
Significance	Not Significant	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation
Discussion	The acreage of impervious surfaces may be an indicator of potential drainage impacts. Clustered development with higher percentages of natural open space is likely to have a lower percentage of impervious surface area than standard subdivisions. Another consideration is setbacks from Los Osos Creek. Greater setbacks may increase the likelihood that development will be located outside of areas subject to flood hazard.			
Biology				
Impact Compared to Draft Area Plan	N/A	**Higher**	Lower	--
Significance	Not Significant	Significant and Unavoidable	Significant and Unavoidable	Significant and Unavoidable
Discussion	This focus area contains highly sensitive vegetation communities: primarily riparian and oak woodland. The alternatives that cluster or concentrate residential and agricultural development furthest away from sensitive habitat are likely to have less impacts on biological resources. In general, alternatives with greater amounts of contiguous natural open space and preservation of wildlife corridors may allow more opportunities to preserve vegetation and habitat.			
Cultural Resources				
Impact Compared to Draft Area Plan	N/A	Higher	Lower	--
Significance	Not Significant	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation
Discussion	In general, areas with slopes less than 10% (as in most or all of this focus area) and within 300 feet of streams (such as Los Osos Creek) are considered more sensitive with regard to archaeological resources. In general, alternatives that cluster or concentrate development beyond this sensitive area may have a lower potential for impacts.			

Resources	IV. No Project - No Additional Development	IVA. No Project - Buildout in Accordance with the Adopted General Plan	IVB. Resource Conservation	IVD. Draft Plan
Visual Resources				
Impact Compared to Draft Area Plan	N/A	**Higher**	Lower	--
Significance	Not Significant	Significant and Unavoidable	Significant and Unavoidable	Significant and Unavoidable
Discussion	In general, this focus area is not highly visible from other areas in the community; however, riparian vegetation is of high visual quality. Existing Coastal Zone Land Use Ordinance standards should preclude any significant removal of riparian vegetation in all alternatives. However, the alternatives that concentrate or cluster development and preserve larger areas in natural open space may be less likely to result in visual impacts. Alternative IVB, because it creates a large buffer area west of Los Osos Creek and encourages agriculture outside of that buffer area, has the least potential for removal of riparian vegetation for agricultural purposes. Any additional development within the focus area is likely to alter the existing open space character of the area.			
Traffic				
Quantified Impact At Buildout	0	**126 peak hour trips**	115 pht	**126 pht**
Impact Compared to Draft Area Plan	Lower	Similar	Lower	--
Significance	Not Significant	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation
Discussion	Trip generation will be about the same for both alternatives when compared with the draft plan.			
Noise				
Impact Compared to Draft Area Plan	N/A	**Higher**	**Higher**	--
Significance	Not Significant	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation
Discussion	In general, the total amount of traffic generated may be an indicator of overall noise impacts. However, Alternative IVB, because it encourages agriculture and residential development outside of a large buffer area west of Los Osos Creek, may result in agricultural operations in closer proximity to both existing and future residential uses. This may increase the potential for noise impacts on those residences.			

Resources	IV. No Project - No Additional Development	IVA. No Project - Buildout in Accordance with the Adopted General Plan	IVB. Resource Conservation	IVD. Draft Plan
Air Quality				
Impact Compared to Draft Area Plan	N/A	Similar	Similar	--
Significance	Not Significant	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation
Discussion	Trip generation can be used as an indicator of long-term emissions and impacts on air quality.			
Land Use Compatibility				
Impact Compared to Draft Area Plan	N/A	**Higher**	**Higher**	--
Significance	Not Significant	Not Significant With Mitigation	Not Significant With Mitigation	Not Significant With Mitigation
Discussion	Potential impacts associated with land use compatibility may occur when different land uses are located in close proximity. In Alternative IVB, agriculture and residential development are encouraged outside of a large buffer area west of Los Osos Creek. This may result in agricultural operations in closer proximity to both existing and future residential uses, and may increase the likelihood of land use compatibility concerns. Alternative IVD, by clustering or concentrating residential development further away from Los Osos Creek than Alternative IVA, may result in less likelihood of compatibility concerns with agricultural operations east of the creek.			
Ranking of Alternatives: 1 being least impact, 5 being greatest impact	1	4	2	3

Environmental impacts are for each alternative are compared with those associated with the draft plan as either higher, lower or similar in magnitude. Estimates of relative environmental impacts are made at a program, not project-level in the absence of project-specific information; when actual projects are proposed in the future, additional environmental review will be needed. Where different uses are possible in a given area, the range of estimated resource demands is shown; where TDCs are allowable, the maximum amount of residential development is assumed.

AFY Acre-feet per year; environmental impacts based on uses producing highest water demand and wastewater flows.

7.5 Environmentally Superior Alternative

CEQA requires that an EIR identify the "environmentally superior" alternative to further aid decision-makers and the public in assessing the environmental consequences of land use decisions. The analysis provided above suggests the following ranking of the environmental consequences of the alternatives:

Estero Planning Area



Least Impact

No Project/No Development Alternative

Resource Conservation Alternative

Draft Plan

No Project/Buildout of Existing Estero Area Plan Alternative

Economic Diversification Alternative

Greatest Impact

When the No Project alternative is identified as the environmentally superior alternative, CEQA requires that the next most environmentally superior alternative be identified. In this case above, the Resource Conservation alternative is the next most environmentally superior alternative.

Focus Areas

Focus Area I



Least Impact

No Project/No Development Alternative

Economic Diversification Alternative

Resource Conservation Alternative

Draft Plan

No Project/Buildout of Existing Estero Area Plan Alternative

Greatest Impact

Focus Area II

Least Impact



No Project/No Development Alternative

Resource Conservation Alternative

Draft Plan

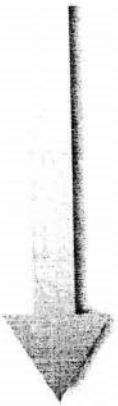
No Project/Buildout of Existing Estero Area Plan Alternative

Economic Diversification Alternative

Greatest Impact

Focus Area III

Least Impact



No Project/No Development Alternative

Resource Conservation Alternative

Economic Diversification Alternative

Draft Plan

No Project/Buildout of Existing Estero Area Plan Alternative

Greatest Impact

Focus Area IV

Least Impact



No Project/No Development Alternative

Resource Conservation Alternative

Draft Plan

No Project/Buildout of Existing Estero Area Plan Alternative

Greatest Impact