

4.11 LAND USE AND PLANNING

This section evaluates the project's proposed land uses and future development within the project site, their consistency with applicable land use policies, and impacts that may result from conflicts with applicable land use policies. The analysis presented in this section is based on the existing pattern of land uses within the project site and vicinity, the proposed on- and off-site project components, and the applicable policies and standards set forth in the General Plan, LUO, 2015/16 County of San Luis Obispo Bikeways Plan, SLOCOG 2019 RTP, San Luis Obispo County MJHMP, SLOLAFCO policies and procedures, and NCSD 2018 Strategic Plan.

4.11.1 Existing Conditions

4.11.1.1 Regional Setting

The project site is located adjacent to the unincorporated community of Nipomo, in the South County Inland Planning Area of San Luis Obispo County. The unincorporated community of Nipomo is a community located approximately 6.1 miles east of the Pacific Ocean outside of the coastal zone in the southern portion of San Luis Obispo County between the city of Arroyo Grande and the city of Santa Maria in Santa Barbara County. There are a variety of land uses within the Nipomo URL. The central core of the community is comprised of office and professional, commercial retail, commercial service, and residential multi-family uses, which is bisected by US 101. Public facilities, recreation, residential single-family uses, and residential suburban uses make up the remaining areas within the Nipomo URL that surround the downtown core.

The Nipomo URL is generally surrounded by land within the Residential Rural (RR) land use designation to the north and east, land within the Agriculture (AG) land use designation to the northeast, east, and south, and land within the Rural Lands (RL) land use designation to the southeast. Proximate village areas near Nipomo include the Woodlands village area, located approximately 1.0 mile to the west; the Blacklake village area, located approximately 0.5 mile northwest; and the Callendar-Garrett village area, located 2.6 miles to the northwest (see Figures 2-1 and 2-2 in Chapter 2, *Project Description*).

The Specific Plan Area is bordered to the southeast and southwest by land within the Nipomo URL and the NCSD service area. The project site is generally surrounded by US 101 and land within the Agriculture (AG) land use designation to the northeast, land within the Residential Suburban (RS) and Commercial Service (CS) land use designations to the southeast, Hetrick Avenue and land within the Residential Suburban (RS) land use designation to the southwest, Cherokee Place, Willow Road, and land within the Residential Suburban (RS) and Residential Rural (RR) land use designations to the northwest (Figure 4.11-1). Based on aerial imagery and information available online, existing land uses on nearby properties are provided in Table 4.11-1 below. Allowable uses on surrounding properties are governed by the County General Plan and LUO, as described in Table 4.11-2 below.

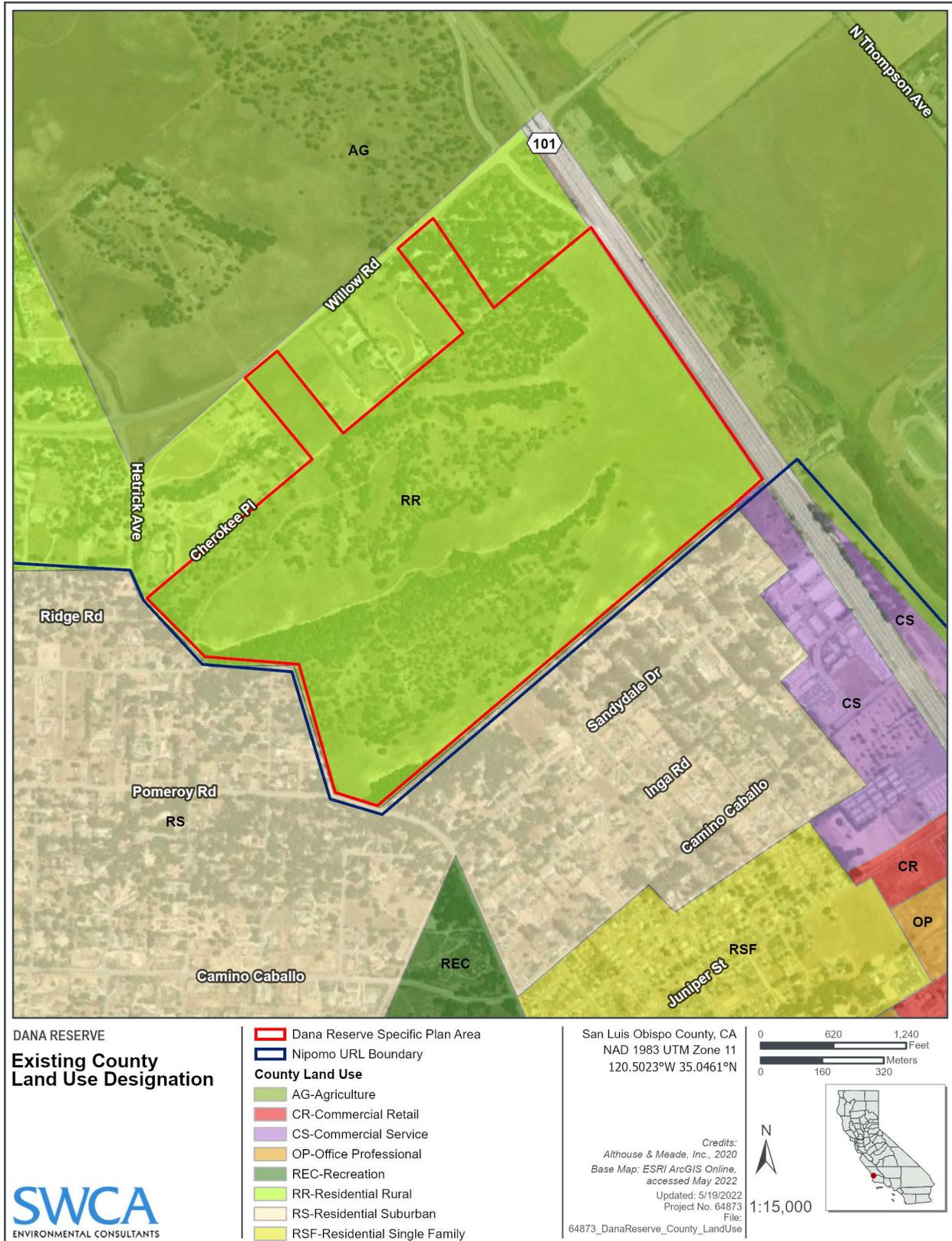


Figure 4.11-1. Existing County land use designations within the project vicinity.

Table 4.11-1. Existing Uses and Land Use Designations Surrounding the Specific Plan Area

Location	Land Use Designation	Existing Land Uses
Northeast of the Project Site	Agriculture (AG)	US 101
		Agricultural uses, including cultivation, nurseries, grazing
		Scattered rural residential single-family housing
		Accessory agriculture structures and reservoirs
Southeast of the Project Site	Agriculture (AG)	Nipomo High School
		Pet grooming business
		Agricultural uses, including cultivation, grazing
	Commercial Service (CS)	Recreational vehicle dealer
		Veterinary clinic
		Mattress store
Southwest of the Project Site	Residential Suburban (RS)	Building supply store
		Self-storage facility
		Safety equipment supplier
		Residential single-family neighborhood
Northwest of the Project Site	Residential Rural (RR)	Residential single-family neighborhood
		Scattered rural residential single-family housing
	Agriculture (AG)	Agricultural uses, including greenhouses
		Scattered rural residential single-family housing
		Agricultural uses, including grazing

Table 4.11-2. County Land Use Designations within the Project Vicinity and Allowable Uses

Land Use Designation	Examples of Potential Allowable Uses
Agriculture (AG)	Crop production and grazing, agricultural processing facilities, single-family dwellings, accessory dwellings, mobile homes, agricultural accessory structures, agricultural worker housing, forestry, animal keeping, cannabis activities, nursery specialties, industrial hemp cultivation, kennels, energy-generating facilities
Commercial Service (CS)	General retail, grocery stores, restaurants, food and beverage products, furniture and fixture products, cabinet shops, metal industries (fabricated), fuel dealers, small-scale manufacturing, warehousing, vehicle/mobile home dealers, agricultural processing facilities, agricultural accessory structures, veterinary medical facilities, kennels, animal keeping, cannabis activities, nursery specialties, crop production and grazing, energy-generating facilities
Residential Suburban (RS)	Single-family dwellings, accessory dwellings, mobile homes, agricultural accessory structures, kennels, animal keeping, cannabis activities, nursery specialties, crop production and grazing, forestry, energy-generating facilities
Residential Rural (RR)	Single-family dwellings, accessory dwellings, agricultural accessory structures, mobile homes, kennels, animal keeping, cannabis activities, crop production and grazing, forestry, industrial hemp cultivation, nursery specialties, energy-generating facilities

Source: County of San Luis Obispo LUO, Section 22.06.030

4.11.1.2 Project Site Setting

4.11.1.2.1 SPECIFIC PLAN AREA

The Specific Plan Area, located on three adjoining parcels within the Residential Rural (RR) land use designation (see Figure 4.11-1), is largely undeveloped, with the exception of unpaved ranch roads traversing portions of the site and minimal agriculture/grazing amenities. Topography of the property ranges from nearly level to moderately sloping hills. Vegetative communities on-site include coast live oak woodland, chaparral, and grasslands. No mapped water features occur on-site. The Specific Plan Area can currently be accessed from Cherokee Place, located along the northern boundary of the site; Hetrick Avenue, located along the western boundary of the site; and Cory Way, located adjacent to the southern boundary of the site. Historical uses on-site included cattle grazing.

4.11.1.2.2 OFF-SITE IMPROVEMENTS

In addition to the Specific Plan Area, this EIR includes an evaluation of numerous necessary off-site transportation-, water-, and wastewater-related improvements (see Figures 2-4 through 2-7, in Chapter 2, *Project Description*).

The project also identifies an off-site location for oak mitigation and conservation (Dana Ridge). Dana Ridge is located on an 854-acre parcel (APNs 090-031-003 and 090-031-004) approximately 2.1 miles east of the project site (see Figures 2-1 and 2-2, in Chapter 2, *Project Description*). Dana Ridge is located within the Agriculture (AG) land use category and is generally surrounded by land within the Agriculture (AG) and Rural Lands (RL) land use designation to the north, and land within the Agriculture (AG) land use designation to the east, south, and west.

The project would require a number of off-site transportation-related improvements, including improvements to the following roadways and intersections:

- An extension of North Frontage Road through APN 091-325-022 at the southeast corner of the Specific Plan Area;
- Widening of Willow Road and signalization at the Willow Road/Collector A intersection within existing ROW areas;
- Restriping and one-way stop control at the Willow Road/Collector B intersection within existing ROW areas;
- Improvements/paving at the Cherokee Place/Collector A and B intersections;
- Removal/closure of the existing Hetrick Avenue driveway access from Pomeroy Road and provision of a new driveway access to Hetrick Avenue from Collector B;
- Restriping and one-way stop control at the Pomeroy Road/Collector B intersection within existing ROW areas; and
- Emergency access at Hetrick Avenue and Cory Way.

All off-site transportation-related improvements are proposed to be located within existing public ROW, except potentially the extension of North Frontage Road through APN 091-325-022. An existing 40-foot-wide public ROW currently exists along the eastern boundary of this parcel. A partial-width roadway extension could be developed within the existing ROW; the County Public Works Department has indicated this improvement would be adequate for implementation of the DRSP. The project applicant is in negotiations with the property owner of APN 091-325-022 regarding the potential for acquisition of an additional 20 feet of ROW, to accommodate a standard (complete) width roadway extension within a

60-foot-wide ROW through this parcel. If the additional ROW is not acquired and a standard-width roadway is not developed as part of the DRSP, it would be a requirement for any future project development approval on APN 091-325-022, which is currently located within the Commercial Service (CS) land use category.

Buildout of the Specific Plan Area would also require a number of off-site water and wastewater system improvements to the existing NCS D service systems. While these improvements have not been designed and their precise locations are not currently known, all off-site water and wastewater system improvements are expected to occur within existing paved roadways, existing public ROW areas, and/or existing NCS D facilities (such as the Southland WWTF).

4.11.2 Regulatory Setting

4.11.2.1 Federal

There are no federal land use regulations applicable to the project.

4.11.2.2 State

4.11.2.2.1 CORTESE-KNOX HETZBERG LOCAL GOVERNMENT REORGANIZATION ACT

The Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 (Cortese-Knox-Hertzberg Act; California Government Code Section 56000 et seq.) establishes procedures for local government changes of organizations, including annexations into a city or special district, incorporation of a city, and city and special district consolidations. The Cortese-Knox-Hertzberg Act delegates these processes to LAFCOs. A LAFCO is a state agency that performs growth management functions, and has approval authority regarding the establishment, expansion, reorganization, and elimination of any city and most types of special districts. LAFCOs establish SOIs for cities and special districts that define the appropriate and probable future jurisdictional boundary and service area of the agency. In addition to the Cortese-Knox-Hertzberg Act, the SLOLAFCO has adopted local policies that it considers in its review of projects, as further described below.

4.11.2.3 Local

4.11.2.3.1 COUNTY OF SAN LUIS OBISPO GENERAL PLAN

Noise Element

The *County of San Luis Obispo General Plan Noise Element* provides a policy framework for addressing potential noise impacts in the planning process (County of San Luis Obispo 1992). The purpose of the Noise Element is to minimize future noise conflicts. The Noise Element identifies the major noise sources in the county (highways and freeways, primary arterial roadways and major local streets, railroad operations, aircraft and airport operations, local industrial facilities, and other stationary sources) and includes goals, policies, and implementation programs to reduce future noise impacts. Among the most significant polices of the Noise Element are numerical noise standards that limit noise exposure within noise-sensitive land uses, and performance standards for new commercial and industrial uses that might adversely impact noise-sensitive land uses.

Safety Element

The two primary principles of the County's Safety Element are emergency preparedness and managed development to reduce risk (County of San Luis Obispo 1999). The Safety Element identifies potential emergency situations and natural disasters within the county and includes goals and policies for response during an emergency or natural disaster and the avoidance of unnecessary risk. The Safety Element includes mapping of hazardous areas, including areas prone to liquefaction, landslides, fault hazards, flood hazards, and dam inundation.

Parks and Recreation Element

The County's Parks and Recreation Element establishes goals, policies, and implementation measures for the management, renovation, and expansion of existing, and the development of new parks and recreation facilities in order to meet existing and projected needs and to assure an equitable distribution of parks throughout the county (County of San Luis Obispo 2006).

Agriculture Element

The County's Agriculture Element protects agricultural resources within the county by creating policies for promotion of the agricultural industry and preservation of open space within agricultural lands (County of San Luis Obispo 2010a). The goals, policies, and implementation measures of this Agriculture Element address the protection of agricultural resources as well as the protection of open space resources on lands zoned for Agriculture (AG) and on other lands used for production agriculture.

Land Use and Circulation Elements

Framework for Planning (Inland)

The first part of the County LUCE is the Framework for Planning (Inland) (County of San Luis Obispo 2015). The Framework for Planning (Inland) contains policies and procedures that apply to the unincorporated area outside the coastal zone and defines how the Land Use Element is used together with the LUO and other adopted plans. The Framework for Planning (Inland) also explains the criteria used in applying land use categories and combining designations to the land, and the operation of the Resource Management System. Combining designations are special map categories that identify areas of unique resources or potential hazards that necessitate more careful project review.

South County Inland Area Plan

The County of San Luis Obispo Area Plans are included as Part II of the LUCE (County of San Luis Obispo 2014a). The South County Area Plan refines the general land use policies of the Framework for Planning (Inland) and serves as a guide for future development within the South County Inland Planning Area. The South County Area Plan identifies where land use categories are applied within the planning area and establishes policies and programs for land use, circulation, public facilities, services and resources that apply areawide, in rural areas, and/or unincorporated urban areas adjacent to cities.

Nipomo Community Plan

The Nipomo Community Plan is intended to provide a long-term guide for land use and transportation within the community of Nipomo. The Nipomo Community Plan is related to the County's General Plan and is included in Part III of the LUCE (County of San Luis Obispo 2014b). While the Framework for Planning (Inland) is the central policy document, the Nipomo Community Plan provides programs that

are more specifically applicable to the community of Nipomo. The Nipomo Community Plan is consistent with other County General Plan elements.

Conservation and Open Space Element

The COSE consists of a policy and program document and a technical appendix. The COSE policy and program document includes separate chapters to address air quality, biological resources, cultural resources, energy, mineral resources, open space, visual resources, and water resources (County of San Luis Obispo 2010b). The technical appendix includes the County's first baseline GHG emissions inventory. The COSE is based on the principles of strategic growth, with the intent to preserve unique or valuable natural resources, to manage development within the sustainable capacity of the county's resources, and to reduce the county's contribution to global climate change.

Housing Element

The County's Housing Element establishes the framework to facilitate housing development and address current and projected housing needs, provides an assessment of housing needs for the unincorporated county, and provides a summary of the County's progress in implementing the programs from the previous housing element (County of San Luis Obispo 2020). The County's Housing Element identifies goals, objectives, policies, and programs to guide County decision making and focused efforts during the planning period.

4.11.2.3.2 2019 REGIONAL TRANSPORTATION PLAN/SUSTAINABLE COMMUNITIES STRATEGY

SLOCOG is an association of local governments in San Luis Obispo County, which is comprised of seven incorporated cities (Arroyo Grande, Atascadero, Grover Beach, Morro Bay, Paso Robles, Pismo Beach, and San Luis Obispo) and the County, which governs the unincorporated areas of the county. SLOCOG's responsibilities include long-range regional transportation planning and funding for the region, preparation of the Regional Housing Needs Allocation (RHNA) report, and preparation of the SCS as part of the RTP.

The 2019 RTP/SCS is the region's long-term vision for the transportation system. As required by state law, this plan is updated every 4 years (SLOCOG 2019). The RTP/SCS outlines how the region will meet or exceed its GHG reduction targets through developing more compact, walkable, bike-friendly, transit-oriented communities; preserving important habitat and agricultural areas; and promoting a variety of transportation demand management and system management tools and techniques to maximize the efficiency of the transportation network. Key principles of the plan include locating new employment centers and neighborhoods near transit to reduce vehicle trips and peak congestion, creating communities around transit stations, with small businesses, housing, and restaurants within walking distance to reduce automobile travel, focusing future growth in urban centers and existing cities to reduce VMT and preserve rural and other natural areas, and preserving established single-family neighborhoods and existing natural and green spaces by accommodating new development within existing urbanized areas and downtown regions.

4.11.2.3.3 COUNTY OF SAN LUIS OBISPO INLAND LAND USE ORDINANCE (TITLE 22)

The LUO was established to guide and manage the future growth in the county in accordance with the General Plan, to regulate land use in a manner that will encourage and support orderly development and beneficial use of lands, to minimize adverse effects on the public resulting from inappropriate creation, location, use, or design of buildings or land uses, and to protect and enhance significant natural, historic,

archaeological, and scenic resources within the county (County of San Luis Obispo 2021). The LUO is the primary tool used by the County to carry out the goals, objectives, and policies of the General Plan.

4.11.2.3.4 SAN LUIS OBISPO COUNTY MULTI-JURISDICTIONAL HAZARD MITIGATION PLAN

The San Luis Obispo County MJHMP has a goal of providing practical, meaningful, attainable, and cost-effective mitigation solutions to reduce vulnerability to the identified hazards and ultimately reduce both human and financial losses from hazard events (County of San Luis Obispo 2019).

4.11.2.3.5 SAN LUIS OBISPO LOCAL AGENCY FORMATION COMMISSION

The SLOLAFCO is responsible for reviewing and approving proposed jurisdictional boundary changes in the county, including the annexation and detachment of territory to and/or from cities and most special districts, incorporations of new cities, formations of new special districts, and consolidations, mergers, and dissolutions of existing districts. Annexation of the Specific Plan Area into NCSD’s service area would be subject to the review and approval of the SLOLAFCO.

4.11.2.3.6 NIPOMO COMMUNITY SERVICES DISTRICT 2018 STRATEGIC PLAN

The NCSD 2018 Strategic Plan is the NCSD’s highest-level planning document for the future (NCSD 2018). The purpose of the Strategic Plan is to provide clear direction of the goals and objectives of the NCSD for future planning purposes. It is a working tool to guide decision-making within the NCSD’s service area.

4.11.2.4 Consistency with Plans and Policies

Table 4.11-3 lists applicable plans and policies pertaining specifically to land use and planning that were adopted for the purpose of avoiding or mitigating an environmental effect and a preliminary evaluation of the project’s consistency with the guidelines and requirements detailed therein. A general overview of these policy documents is presented above in Section 4.11.2, *Regulatory Setting*, and in Chapter 3, *Environmental Setting*. Policies for which the project is found to be potentially inconsistent with are discussed further in Section 4.11.5, *Project-Specific Impacts and Mitigation Measures*.

Table 4.11-3. Preliminary Policy Consistency Evaluation

Goals, Policies, Plans, Programs and Standards	Intent of the Policy in Relation to Avoiding or Mitigating Significant Environmental Impacts	Preliminary Consistency Determination
County of San Luis Obispo General Plan – Conservation and Open Space Element		
Policy AQ 1.1 Compact Development. Encourage compact land development by concentrating new growth within existing communities and ensuring complete services to meet local needs.	The intent of this policy is to locate new development within existing communities.	Potentially Consistent. The project site is located directly adjacent to areas within the existing Nipomo URL and the NCSD service area. The Specific Plan Area is also within the NCSD SOI, which identifies the probable future physical boundary and service area of a local agency or municipality.

Goals, Policies, Plans, Programs and Standards	Intent of the Policy in Relation to Avoiding or Mitigating Significant Environmental Impacts	Preliminary Consistency Determination
<p>Policy OS 1.1 Future open space protection. Continue to identify and protect open space resources with the following characteristics:</p> <ul style="list-style-type: none"> • Recreation areas • Ecosystems and environmentally sensitive resources such as natural area preserves, streams and riparian vegetation, unique, sensitive habitat, natural communities, significant marine resources • Archaeological, cultural, and historical resources • Scenic areas • Hazard areas • Rural character 	<p>The intent of this policy is to protect open space resources.</p>	<p>Potentially Consistent. The DRSP proposes 49.8 acres of land within the Open Space (OS) land use designation, including undeveloped open space, trails, and stormwater basins, which would comprise approximately 17.3% of the Specific Plan Area. Open Space area includes areas that would remain undeveloped long term, as well as areas that would provide opportunities for passive uses. Examples of areas intended to remain undisturbed long term include the primary oak forest/woodland area centrally located within the Specific Plan Area, while passive open space areas would include pedestrian and equestrian trails and seating areas. These open space areas would serve to protect biological resources and help preserve the rural character and aesthetic quality of the project site. The oak forest to be protected as open space is one of the more visible scenic resources on-site, due to its visibility above other surrounding vegetation and development.</p> <p>As discussed in Section 4.5, <i>Cultural Resources</i>, potential impacts to archaeological resources have been identified and would be reduced to a less-than-significant level with implementation of identified mitigation measures, including avoidance and preservation of sensitive areas as open space.</p> <p>As discussed in Section 4.9, <i>Hazards and Hazardous Materials</i>, the DRSP is not located on a hazardous materials site pursuant to California Government Code Section 65962.5 and would not result in development on or adjacent to a hazardous materials site, and is not located within 2 miles of a public airport.</p>
<p>Policy OS 1.8 Land divisions and development. Encourage the use of cluster land divisions and cluster development that will locate residential clusters on the least environmentally sensitive portions of properties.</p>	<p>The intent of this policy is to maximize protection of environmentally sensitive resources.</p>	<p>Potentially Consistent. The project's list of objectives includes an objective to maintain the large, centrally located oak forest/ woodland area as a site feature and to minimize impacts to special-status plants and animals on-site. The DRSP proposes 49.8 acres of land within the Open Space land use designation, including undeveloped open space, trails, and stormwater basins, which would comprise approximately 17.3% of the Specific Plan Area. Open Space area includes areas that would remain undeveloped long term, as well as areas that would provide opportunities for passive uses.</p>
<p>Policy OS 2.1 Open Space management to protect, sustain, and restore. Manage open space resources on public lands to protect, sustain, and, where necessary, restore the resources. Encourage such management strategies on private lands.</p>	<p>The intent of this policy is to protect, sustain, and restore open space resources.</p>	<p>Potentially Consistent. The DRSP proposes 49.8 acres of land within the Open Space land use designation, including undeveloped open space, trails, and stormwater basins, which would comprise approximately 17.3% of the Specific Plan Area. Open Space area includes areas that would remain undeveloped long term, as well as areas that would provide opportunities for passive uses. Examples of areas intended to remain undisturbed long</p>

Goals, Policies, Plans, Programs and Standards	Intent of the Policy in Relation to Avoiding or Mitigating Significant Environmental Impacts	Preliminary Consistency Determination
		term include the primary oak forest/woodland area centrally located within the Specific Plan Area, while passive open space areas would include pedestrian and equestrian trails, as well as seating areas. These open space areas would serve to protect biological resources and would help preserve the rural character and aesthetic quality of the project site.
<p>Policy OS 4.3 Conversion of rural areas to Urban Lands. Limit the conversion of unincorporated rural areas to Urban Lands in accordance with the considerations for urban and village expansion in Framework for Planning of the Land Use Element.</p>	<p>The intent of this policy is to limit the conversion of rural areas to urban uses.</p>	<p>Potentially Consistent. While the Specific Plan Area is currently undeveloped, the site is located directly adjacent to areas within the existing Nipomo URL and the NCSD service area. The Specific Plan Area is also within the NCSD SOI, which identifies the probable future physical boundary and service area of a local agency or municipality. Therefore, establishment of residential, retail, and education uses within the Specific Plan Area would occur adjacent to an existing urban community and would not result in the conversion of a rural area to urban uses.</p>
<p>Policy OS 4.4 Annexation of urban development. Urban development will be annexed to an incorporated city or an existing community services district (CSD) or County service area (CSA), specifically in the following scenarios:</p> <ol style="list-style-type: none"> a. Where cluster development from rural property is to be located adjacent to the urban area; or b. Where and when higher density development is to occur consistent with resource and service capabilities and orderly extension of urban services. 	<p>The intent of this policy is to annex urban development into proximate jurisdictional and service area boundaries.</p>	<p>Potentially Consistent. The project would require annexation into the NCSD service area to facilitate the NCSD's provision of water and wastewater services within the Specific Plan Area. The DRSP is within the NCSD SOI and would be required to comply with the NCSD's annexation policies and guidelines. Annexation of the Specific Plan Area into the NCSD service area would be subject to the review and approval of the SLOLAFCO.</p>
<p>Policy HE 1.01. Support and prioritize new residential development in areas identified for strategic regional residential development and other areas that are (a) located along priority transportation corridors (i.e., highways identified by San Luis Obispo Council of Governments as priorities for regional infrastructure investments), (b) located in or between areas with higher concentration of jobs and services, and (c) located within or in close proximity to existing urbanized areas or communities. This includes, but is not limited to, supporting and prioritizing the following in such areas:</p> <ul style="list-style-type: none"> • improvements to infrastructure and facilities; • reductions in infrastructure constraints for the development of housing to the extent possible; and increases in the supply of land for residential uses. 	<p>The intent of this policy is to prioritize residential development in strategic growth areas.</p>	<p>Potentially Consistent. The project site is located directly adjacent to areas within the existing Nipomo URL and the NCSD service area. The Specific Plan Area is also within the NCSD SOI, which identifies the probable future physical boundary and service area of a local agency or municipality.</p>

Goals, Policies, Plans, Programs and Standards	Intent of the Policy in Relation to Avoiding or Mitigating Significant Environmental Impacts	Preliminary Consistency Determination
Framework for Planning (Inland)		
Principle 1, Policy 1. Maintain and protect a living environment that is safe, healthful and pleasant for all residents.	The intent of this policy is to maintain county residents' quality of life.	Potentially Consistent. The DRSP proposes 49.8 acres of land within the Open Space (OS) land use designation, including undeveloped open space, neighborhood pocket parks, a 10-acre public park, and pedestrian and equestrian trails. Parks and trails would offer numerous opportunities for both passive and active recreational activities on-site. The DRSP also includes design guidelines intended to reflect the rural visual character of the site, which would contribute to the visual quality of the site. In addition, future development of commercial uses on-site would provide proximate employment opportunities and goods and services to residents of surrounding neighborhoods.
Principle 1, Policy 7. Give highest priority to avoiding significant environmental impacts from development through site and project design. Where such impacts cannot be avoided, minimize them to the maximum extent feasible.	The intent of this policy is to maximize avoidance of sensitive environmental resources through site design.	Potentially Consistent. The project's list of objectives includes an objective to maintain the large, centrally located oak forest/ woodland area as a site feature and to minimize impacts to special-status plants and animals on-site. Project design and redesign through the environmental review process has also effectively avoided direct impacts related to archaeological resources and noise. The DRSP proposes 49.8 acres of land within the Open Space (OS) land use designation, including undeveloped open space, trails, and stormwater basins, which would comprise approximately 17.3% of the Specific Plan Area. Open Space area includes areas that would remain undeveloped long term, as well as areas that would provide opportunities for passive uses.
Principle 2: Strengthen and direct development toward existing and strategically planned communities.	The intent of this policy is to focus future development within existing and planned communities.	Potentially Consistent. The project site is located directly adjacent to areas within the existing Nipomo URL and the NCSO service area. The Specific Plan Area is also within the NCSO SOI, which identifies the probable future physical boundary and service area of a local agency or municipality, and is envisioned for future development in the current General Plan in policies and guidance related to Canada Ranch.
Policy 1. Maintain rural areas in agriculture, low-intensity recreation, very low-density residential uses, and open space uses that preserve and enhance a well-defined rural character.	The intent of this policy is to maintain the rural character of rural areas.	Potentially Consistent. While the Specific Plan Area is currently undeveloped, the site is located directly adjacent to areas within the existing Nipomo URL and the NCSO service area. The Specific Plan Area is also within the NCSO SOI, which identifies the probable future physical boundary and service area of a local agency or municipality. Additionally, the Specific Plan Area is currently identified for growth in the General Plan through implementation of Canada Ranch. Though this project proposes to change the priority of uses at the project site from what was envisioned for Canada Ranch, establishment of residential, retail, and education uses within

Goals, Policies, Plans, Programs and Standards	Intent of the Policy in Relation to Avoiding or Mitigating Significant Environmental Impacts	Preliminary Consistency Determination
		the Specific Plan Area would not occur within a rural area not previously envisioned for growth in the County's General Plan.
Policy 2. Avoid establishing or expanding Residential Rural and Residential Suburban areas outside urban or village reserve areas.	The intent of this policy is to limit Residential Rural and Residential Suburban uses to existing urban or village reserve areas.	Potentially Consistent. The project includes a proposed modification of the Nipomo URL to include the Specific Plan Area and annexation of the Specific Plan Area into the NCSD service area. Therefore, the project would not expand residential areas outside the URL. The Specific Plan Area is within the NCSD SOI, which identifies the probable future physical boundary and service area of a local agency or municipality, and development of the project site is also currently envisioned in the County's General Plan through development of Canada Ranch.
Policy 3. Plan for most future development to be within existing and strategically planned cities and communities.	The intent of this policy is to locate future development within existing and planned communities.	Potentially Consistent. The project site is located directly adjacent to areas within the existing Nipomo URL and the NCSD service area. The Specific Plan Area is also within the NCSD SOI, which is indicative that the Specific Plan Area is an area designated for planned future growth.
Policy 4. Create complete communities with appropriate areas for housing, commerce, civic uses, schools, recreation and open spaces.	The intent of this policy is to create complete communities with a variety of uses.	Potentially Consistent. The DRSP would establish land use districts for future development of residential land uses, commercial land uses, educational uses, and recreation and open spaces uses. An overview of the proposed land use districts is provided within Chapter 2, <i>Project Description</i> .
Policy 5. Create active and vital urban and village environments that are attractive, compact and orderly arrangements of structures and open space, appropriate to the size and scale of each community.	The intent of this policy is to create active and strategically designed urban environments.	Potentially Consistent. The DRSP includes a 10-acre public neighborhood park and an approximately 1.01-acre equestrian trailhead and staging area within the Recreation land use category, as well as between 8.5 to 12 acres of publicly accessible but privately maintained pocket parks within residential neighborhoods. The pocket parks would be positioned along a system of connected trails to enable users to enter the trail system and safely walk to each park within the DRSP.
Policy 6. Plan adequate and convenient areas within communities for employment and economic development near transit and residential areas.	The intent of this policy is to develop residential uses near employment opportunities and transit infrastructure.	Potentially Consistent. The DRSP contains a variety of commercial land uses with varying density ranges. These include Village Commercial (DR-VC) and Flex Commercial (DR-FC). More specifically, anticipated individual commercial land uses include a village center, flex commercial, a neighborhood barn, a hotel, a daycare center, and an educational/training campus. These uses would be located within proximity to proposed residential uses on-site. Public transit stops would be included in the Specific Plan Area to encourage transit use by DRSP residents, employees, and visitors, including two new public transit stops and a proposed Park and Ride lot.

Goals, Policies, Plans, Programs and Standards	Intent of the Policy in Relation to Avoiding or Mitigating Significant Environmental Impacts	Preliminary Consistency Determination
<p>Policy 7. Phase urban development in a compact manner, first using vacant or underutilized "infill" parcels and lands next to or near existing development.</p>	<p>The intent of this policy is to prioritize infill development.</p>	<p>Potentially Consistent. The project site is generally surrounded by existing suburban and rural residential development. The project site is located directly adjacent to areas within the existing Nipomo URL and the NCSD service area and is within the NCSD's SOI, which is indicative that the Specific Plan Area is an area designated for planned future growth.</p>
<p>Policy 8. Consider urban expansion Land Use Element amendments when the available inventory of suitable internal or "infill" land is largely developed and only when resources, services and facilities to adequately accommodate the associated growth can be assured.</p>	<p>The intent of this policy is to allow for urban expansion when adequate services can be assured.</p>	<p>Potentially Consistent. The project site is generally surrounded by existing suburban and rural residential development. The project site is located within the NCSD SOI and would include various off-site improvements to NCSD infrastructure to ensure adequate service capacity to serve the project. Analysis provided in this EIR concludes that adequate resources are available (e.g., water, wastewater, transportation facilities, etc.) to serve the project with implementation of identified necessary off-site improvements and mitigation.</p>
<p>Policy 9. Give high priority to funding needed infrastructure improvements in a timely manner within existing and strategically planned urban and village areas.</p>	<p>The intent of this policy is to prioritize infrastructure improvements in existing and strategically planned areas.</p>	<p>Potentially Consistent. The project site is located within the Canada Ranch Specific Plan Area, where future buildout of commercial and residential uses has been anticipated in the County's General Plan. The Specific Plan Area is also within the NCSD SOI.</p>
<p>Policy 10. The cost of additional services and facilities will be fairly shared among those who most immediately benefit and the entire community.</p>	<p>The intent of this policy is to distribute the cost of service infrastructure fairly.</p>	<p>Potentially Consistent. The project would include off-site improvements to various roadways and intersections, as well as various off-site improvements to NCSD infrastructure that would be required to serve the project. The NCSD has initiated a detailed analysis of appropriate proportionate cost contributions that the project applicant and/or future developers of the Specific Plan Area would be required to provide to fund necessary improvements.</p>
<p>Principle 3, Policy 3. Establish and maintain a distinct edge between urban and rural areas to enhance community separation while allowing for appropriate and compact urban expansion at the urban edge.</p>	<p>The intent of this policy is to maintain a distinction between urban and rural areas.</p>	<p>Potentially Consistent. The project site is generally surrounded by existing suburban and rural residential development. The project site is located directly adjacent to areas within the existing Nipomo URL and the NCSD service area. Based on proposed land use districts and densities, development of the Specific Plan Area would be compact and would maintain a distinct edge between urban and rural areas</p>
<p>Principle 4, Policy 1. Plan communities with schools, parks, public spaces, transit stops and commercial districts located as focal points within convenient walking distances of neighborhoods.</p>	<p>The intent of this policy is to encourage use of a variety of transportation modes through strategic design.</p>	<p>Potentially Consistent. The DRSP contains a variety of commercial land uses with varying density ranges, including Village Commercial (DR-VC) and Flex Commercial (DR-FC). More specifically, anticipated individual commercial land uses include a village center, flex commercial, a neighborhood barn, a hotel, a daycare center, and an educational/training campus. These uses would be located within proximity to proposed residential uses on-site</p>

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Principle 4, Policy 2. Plan for maximum connectivity between different land uses through walkways or other means.	The intent of this policy is to maximize walkability between land uses.	and would be accessible via the proposed system of connected trails, sidewalks, and crosswalks. Public transit stops would be included in the Specific Plan Area to encourage transit use by DRSP residents, employees, and visitors. Potentially Consistent. The DRSP proposes a pedestrian trail network to provide recreational opportunities and connect the individual neighborhoods to the commercial and job areas of the site without the need to use an automobile. Approximately 3.8 miles of pedestrian trails would be accessible to residents and the community.
Principle 4, Policy 3. Create attractive street enhancements and public spaces that serve as gathering places on corridors and at connecting locations.	The intent of this policy is to provide gathering places along travel corridors.	Potentially Consistent. The DRSP includes guidelines for architecture, streetscapes, and landscaping that are intended to respond to the rural character of the area. In addition, the DRSP site design includes common areas to include pocket parks and open space areas, trails, recreation areas, landscaping, and drainage basins.
Principle 4, Policy 5. Create neighborhoods and non-residential areas that minimize fear and crime through environmental and urban design.	The intent of this policy is to minimize fear and crime in communities.	Potentially Consistent. The DRSP includes design guidelines for site and building lighting, which would help deter unauthorized entry into buildings and/or other criminal activities.
Principle 6, Policy 1. Plan for most new housing to be within urban or village areas and close to jobs while protecting residential areas from incompatible uses.	The intent of this policy is to locate housing near existing urban and village areas.	Potentially Consistent. The project site is generally surrounded by existing suburban and rural residential development. The project site is located directly adjacent to areas within the existing Nipomo URL and the NCSD service area.
Principle 7: Encourage mixed land uses.	The intent of this policy is to encourage mixed land uses.	Potentially Consistent. The DRSP is a primarily residential project; however, it also identifies a mix of land uses within the Specific Plan Area to serve the new neighborhoods and surrounding community. The DRSP would allow for the future phased development of residential uses, village and flex commercial uses (including a hotel, educational/training facilities, and retail/light industrial uses), open space, trails, and a public neighborhood park within the Specific Plan Area.
Policy 1. Integrate residential units designed for affordability with non-residential uses in order to bring workplaces, commercial development and homes closer together for workers, senior citizens and others.	The intent of this policy is to encourage affordable residential development mixed use projects.	Potentially Consistent. The DRSP would allow for the construction of a minimum of 75 affordable residential units on-site and has a goal of providing substantial additional workforce-priced housing. These units would be located adjacent to village and flex commercial uses, including a hotel, educational/training facilities, and retail/light industrial uses.

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Policy 2. Integrate complementary uses within commercial sites, in order to build effective mixed-use neighborhoods.	The intent of this policy is to encourage development of mixed-use neighborhoods.	Potentially Consistent. The DRSP would allow for the future phased development of residential uses, village and flex commercial uses (including a hotel, educational/training facilities, and retail/light industrial uses), open space, trails, and a public neighborhood park within the Specific Plan Area.
South County Inland Area Plan		
<i>Economic Expansion Goals</i>		
1. Encourage economic development of the sub-area that will generate local employment for residents, create an adequate supply of goods and services locally, and help generate sufficient revenue for necessary public services and facilities.	The intent of this policy is to generate jobs and revenue through provision of local retail and service centers.	Potentially Consistent. The DRSP would allow for the future phased development of village and flex commercial uses, including a hotel, educational/training facilities, and retail/light industrial uses within the Specific Plan Area.
2. Provide sufficient areas for a variety of commercial, tourist-serving and light industrial developments to generate local business activity, and increase sales, transient occupancy and property tax revenues.	The intent of this policy is to generate local business activity.	Potentially Consistent. The DRSP is a primarily residential project; however, it also identifies a mix of land uses within the Specific Plan Area to serve the new neighborhoods and surrounding community. The DRSP would allow for the future phased development of village and flex commercial uses, including a hotel, educational/training facilities, and retail/light industrial uses within the Specific Plan Area.
4. Develop an economic strategic plan for South County to enable it to play a stronger role in the economic future of the county while providing the resources necessary to sustain the needs of its citizens.	The intent of this policy is to encourage economic growth in the South County planning area.	Potentially Consistent. The DRSP would allow for the future phased development of village and flex commercial uses, including a hotel, educational/training facilities, and retail/light industrial uses within the Specific Plan Area. These uses would serve on-site residents, community members of Nipomo, and surrounding areas.
5. Encourage and support commercial, recreational and industrial uses that will help facilitate economic independence for the possible future incorporation of Nipomo.	The intent of this policy is to facilitate economic independence for Nipomo.	Potentially Consistent. The DRSP would allow for the future phased development of village and flex commercial uses, including a hotel, educational/training facilities, and retail/light industrial uses within the Specific Plan Area. These uses would contribute to the economic vitality of Nipomo.
6. Promote the development of commercial and industrial uses (light industrial and research/development) to provide for the functional needs of the community and an employment base for the South County (South) sub-area.	The intent of this policy is to promote development of commercial and industrial uses in the South County South subarea.	Potentially Consistent. The DRSP would allow for the future phased development of village and flex commercial uses, including a hotel, educational/training facilities, and retail/light industrial uses within the Specific Plan Area. These uses would contribute jobs and services for the community of Nipomo and surrounding areas.
8. Analyze economic as well as environmental impacts in making future planning decisions.	The intent of this policy is to balance economic and environmental impacts in planning decisions.	Potentially Consistent. The DRSP would allow for the future phased development of village and flex commercial uses, including a hotel, educational/training facilities, and retail/light industrial uses within the Specific Plan Area. These uses would contribute to the economic vitality of Nipomo.

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<i>Public Facilities, Services, and Resources</i>		
<p>4. Encourage the formation or addition of local community services to generate revenue that can be used to implement community programs.</p>	<p>The intent of this policy is to generate revenue from the formation or addition of community services.</p>	<p>Potentially Consistent. The DRSP would allow for the future phased development of village and flex commercial uses, including a hotel, educational/training facilities, and retail/light industrial uses within the Specific Plan Area.</p>
<i>Water Systems</i>		
<p>13. Water Service Plan Coordination, South County (South). The Planning Department should provide Land Use Element plan information to private water companies to coordinate future service expansions with County policies.</p>	<p>The intent of this policy is to coordinate future water service expansions.</p>	<p>Potentially Consistent. The DRSP would be served by the NCSO for water service and includes numerous off-site improvements to NCSO infrastructure to ensure adequate capacity of infrastructure to serve the project. The NCSO has been consulted and coordinated with during the planning process and has identified necessary off-site improvements needed to serve the project.</p>
<i>Canada Ranch Objectives</i>		
<p>1. Service commercial and light industrial uses designed as business or office parks that have site planning, architecture, and landscaping.</p>	<p>The intent of this policy is to support development of service commercial and light industrial uses within the Canada Ranch Specific Plan Area.</p>	<p>Potentially Consistent. The requested General Plan Amendment and Specific Plan would amend the priority of uses identified for Canada Ranch to provide a primarily residential project. However, the DRSP would allow for the future phased development of village and flex commercial uses, including a hotel, educational/training facilities, and retail/light industrial uses within the Specific Plan Area.</p>
<i>Land Use Programs</i>		
<p>4. Economic Development, South County (South). The Department of Planning and Building should help the community initiate a program for economic development within the sub-area, so that a variety of special district or redevelopment agency benefits and loan programs for physical improvements, image development and marketing can be created within an overall program.</p> <p>a. With community participation, conduct a market study and fiscal impact analysis to determine the expected trends in business development and potential strategies for enhancing them in carefully selected markets, such as tourism, community retail or light industrial uses.</p> <p>b. Establish a strategic plan for economic development that includes all income and ethnic segments of Nipomo and the south county, and undertake appropriate measures to implement the strategy.</p> <p>c. Work with the South County Historical Society, Nipomo Chamber of Commerce and other community</p>	<p>The intent of this policy is to foster economic development.</p>	<p>Potentially Consistent. The DRSP would allow for the future phased development of village and flex commercial uses including a hotel, educational/training facilities, and retail/light industrial uses within the Specific Plan Area. These uses would contribute to the economic vitality of Nipomo.</p> <p>The DRSP also proposes 49.8 acres of land within the Open Space (OS) land use designation, including undeveloped open space, pedestrian and equestrian trails, and a 10-acre public park that would attract tourists.</p>

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<p>organizations for additional promotion of Nipomo and the south county.</p>		
<p>10. Specific Plan Areas, South County (South). The County should work with property owners to schedule the preparation of specific plans for four areas to increase the amount of employment areas adjacent to or near Nipomo:</p> <ul style="list-style-type: none"> a. Canada Ranch, for industrial, commercial service, commercial retail and incidental residential uses; b. Southland Street, for industrial and commercial retail uses; c. West Nipomo Rural Village, for a mix of residential and neighborhood-serving and recreational uses; d. Hanson Industries property, for a mix of recreational, industrial, office and residential uses. <p>The specific plans should identify the appropriate scale and intensity of these general uses in more detail, consistent with topics required by Government Code Sections 65450 through 65457 as well as economic issues concerning the most suitable uses.</p>	<p>The intent of this policy is to plan community growth through development of specific plans.</p>	<p>Potentially Consistent. The DRSP is a Specific Plan that has been designed within much of the same area that was included in the Canada Ranch Specific Plan Area. While the primary land use within the Specific Plan Area would be residential uses, the DRSP would also allow for the future phased development of village and flex commercial uses, including a hotel, educational/training facilities, and retail/light industrial uses within the Specific Plan Area. These uses would provide additional employment opportunities adjacent to the existing Nipomo URL boundary.</p>
<p><i>Other Means of Transportation</i></p>		
<p>2. Open space or agricultural separators (greenbelts) are important between communities to prevent sprawl or strip commercial development that can interfere with development of urban village centers. The most effective land use categories to retain low-density development are Agriculture, Rural Lands, Residential Rural and Open Space.</p>	<p>The intent of this policy is to maintain open space buffers between existing urban and rural communities.</p>	<p>Potentially Consistent. The DRSP is located within a fringe area planned for future growth and development based on the Canada Ranch Specific Plan Area designation, its shared boundaries with the Nipomo URL and NCSD service area, and its location within the NCSD SOI.</p>
<p>Nipomo Community Plan</p>		
<p><i>Water Systems</i></p>		
<p>10. Water Service Plan Coordination. The Planning Department should provide Land Use Element plan information to private water companies to coordinate future service expansions with county policies.</p>	<p>The intent of this policy is to coordinate future water service expansions.</p>	<p>Potentially Consistent. The DRSP would be served by the NCSD for water service and includes numerous off-site improvements to NCSD infrastructure to ensure adequate capacity of infrastructure to serve the project. The NCSD has been consulted and coordinated with during the planning process and identified necessary improvements.</p>
<p><i>Land Use Programs</i></p>		
<p>1. Commercial/Residential Balance. The County should monitor the annual amount of proposed commercial, industrial, and office development for its cumulative resource usage and to determine if the housing supply and annual residential development will be adequate for the demand generated by non-residential development. If resource usage or housing supply would be adversely affected</p>	<p>The intent of this policy is to maintain a balance of housing supply and proposed commercial, industrial, and office uses.</p>	<p>Potentially Consistent. While the primary land use within the Specific Plan Area would be residential uses, the DRSP would also allow for the future phased development of village and flex commercial uses, including a hotel, educational/training facilities, and retail/light industrial uses within the Specific Plan Area.</p>

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<p>by such development, a system to restore proper balance should be proposed in future area plan updates.</p>		
<p>2. Improvement Districts. The County should work with property owners to establish a parking and business improvement district to finance curbs, gutters, sidewalks, street trees, landscaping, public open spaces, and street lights throughout the Central Business District.</p>	<p>The intent of this policy is to facilitate needed public improvements.</p>	<p>Potentially Consistent. The project would provide funding to facilitate numerous off-site roadway improvements as well as improvements to NCSD water and wastewater infrastructure that would be used to serve the project and its future tenants.</p>
<p>SLOCOG 2019 Regional Transportation Plan</p>		
<p>Policy Objective 2.2. Improve opportunities for businesses and citizens to easily access goods, jobs, services, and housing.</p>	<p>The intent of this policy is to improve accessibility and connectivity between transportation modes.</p>	<p>Potentially Consistent. The DRSP would allow for the future development of roadways that connect the Specific Plan Area to off-site roads within the vicinity to act as a continuation of County-maintained roadways. Public transit stops would be included in the Specific Plan Area to encourage transit use by DRSP residents, employees, and visitors. The DRSP also includes a system of connected trails that would provide accessibility for pedestrians and cyclists throughout the project site.</p>
<p>Policy Objective 2.5. Support cooperative planning activities that lead to an integrated multimodal transportation system.</p>	<p>The intent of this policy is to develop an integrated multimodal transportation system.</p>	<p>Potentially Consistent. The DRSP would allow for the future development of roadways that connect the Specific Plan Area to off-site roads within the vicinity to act as a continuation of County-maintained roadways. Public transit stops would be included in the Specific Plan Area to encourage transit use by DRSP residents, employees, and visitors. The DRSP also includes a system of connected trails that would provide accessibility for pedestrians and cyclists throughout the project site.</p>
<p>Goal 3. Support a vibrant economy.</p>	<p>The intent of this policy is to support a vibrant economy.</p>	<p>Potentially Consistent. The DRSP would result in the generation of 273 new full-time equivalent jobs and short-term construction employment opportunities.</p> <p>The DRSP would allow for the future phased development of village and flex commercial uses, including a hotel, educational/training facilities, and retail/light industrial uses within the Specific Plan Area. These uses would contribute to the economic vitality of Nipomo.</p> <p>The DRSP also proposes 49.8 acres of land within the Open Space land use designation, including undeveloped open space, pedestrian and equestrian trails, and a 10-acre public park that would attract tourists to the area.</p>
<p>Policy Objective 3.1. Support transportation investments and choices to enhance economic activity, travel, and tourism.</p>	<p>The intent of this policy is to support transportation system improvements.</p>	<p>Potentially Consistent. The project would provide funding to facilitate numerous off-site roadway improvements, as described in Chapter 2, <i>Project Description</i>. In addition, on-site circulation components would include a pedestrian and equestrian trail system, new</p>

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		public transit stops, and a new Park and Ride lot.
Goal 5. Foster livable, healthy communities and promote social equity.	The intent of this policy is to foster good quality of life.	Potentially Consistent. The DRSP proposes 49.8 acres of land within the Open Space (OS) land use designation, including undeveloped open space, neighborhood pocket parks, a 10-acre public park, and pedestrian and equestrian trails. Parks and trails would offer numerous opportunities for both passive and active recreational activities on-site. The DRSP also includes design guidelines intended to reflect the rural visual character of the site, which would contribute to the visual quality of the site. In addition, future development of commercial uses on-site would provide proximate employment opportunities and goods and services to residents of surrounding neighborhoods.
Policy Objective 5.1. Reflect community values while integrating land use and transportation planning to connect communities through a variety of transportation choices that promote healthy lifestyles.	The intent of this policy is to integrate land use and transportation in a manner that promotes alternative transportation modes.	Potentially Consistent. The DRSP proposes a pedestrian trail network to provide recreational opportunities and connect the individual neighborhoods to the commercial and job areas of the site without the need to use an automobile. Approximately 3.8 miles of pedestrian trails would be accessible to residents and the community. The DRSP also includes internal roadway design guidelines that include the provision of bicycle lanes and public spaces with bicycle racks.
Policy Objective 5.2. Integrate public health and social equity in transportation planning and decision-making.	The intent of this policy is to integrate public health and social equity in transportation infrastructure designs.	Potentially Consistent. The DRSP proposes a pedestrian trail network to provide recreational opportunities and connect the individual neighborhoods to the commercial and job areas of the site without the need to use an automobile. Approximately 3.8 miles of pedestrian trails would be accessible to residents and the community. The DRSP also includes internal roadway design guidelines that include the provision of bicycle lanes and public spaces with bicycle racks. The DRSP would allow for the construction of a minimum of 75 affordable residential units on-site. These units would be located greater than 500 feet from US 101 to minimize potential health impacts associated with vehicle DPM emissions.
Policy Objective 5.3. Support efforts to increase the supply and variety of housing, jobs, and basic services in locations that reduce trips, travel distances, and congestion on US 101.	The intent of this policy is to support mixed-use development that reduces vehicle congestion.	Potentially Consistent. The DRSP would establish land use districts for future development of residential land uses, commercial land uses, educational uses, and recreation and open spaces uses. Future development of commercial uses on-site would provide proximate employment opportunities and goods and services to residents of surrounding on- and off-site neighborhoods.

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<p>Policy Objective 5.4. Make investments and develop programs that support local land use decisions that implement the SCS and other strategies to reduce GHG emissions and make our communities more healthy, livable, sustainable, and mobile.</p>	<p>The intent of this policy is to reduce GHG emissions through strategic land use development.</p>	<p>Potentially Consistent. The DRSP would establish land use districts for future development of residential land uses, commercial land uses, educational uses, and recreation and open spaces uses. Future development of commercial uses on-site would provide proximate employment opportunities and goods and services to residents of surrounding on- and off-site neighborhoods. The DRSP also includes a network of pedestrian trails, bicycle infrastructure, and transit stops that would encourage use of alternative transportation modes to access the site and associated land uses, which would minimize GHG emissions associated with vehicle trips.</p>
<p>Goal 6. Practice environmental stewardship</p>	<p>The intent of this policy is to practice environmental stewardship.</p>	<p>Potentially Consistent. The project's list of objectives includes an objective to maintain the large, centrally located oak forest/ woodland area as a site feature and to minimize impacts to special-status plants and animals on-site. The DRSP proposes 49.8 acres of land within the Open Space (OS) land use designation, including undeveloped open space, trails, and stormwater basins, which would comprise approximately 17.3% of the Specific Plan Area. Additional environmental resources, such as sensitive archaeological areas and noise, have been avoided or minimized through project design.</p> <p>The DRSP also includes a network of pedestrian trails, bicycle infrastructure, and transit stops that would encourage use of alternative transportation modes to access the site and associated land uses, which would minimize air pollutant and GHG emissions associated with vehicle trips.</p>
<p>Policy Objective 6.1. Integrate environmental considerations in all stages of planning and implementation.</p>	<p>The intent of this policy is to integrate environmental considerations in planning decisions.</p>	<p>Potentially Consistent. The project's list of objectives includes an objective to maintain the large, centrally located oak forest/ woodland area as a site feature and to minimize impacts to special-status plants and animals on-site. The DRSP proposes 49.8 acres of land within the Open Space land use designation, including undeveloped open space, trails, and stormwater basins, which would comprise approximately 17.3% of the Specific Plan Area. Additional environmental resources, such as sensitive archaeological areas and noise, have been avoided or minimized through project design.</p> <p>The DRSP also includes a network of pedestrian trails, bicycle infrastructure, and transit stops that would encourage use of alternative transportation modes to access the site and associated land uses, which would minimize air pollutant and GHG emissions associated with vehicle trips.</p>

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Goal 7. Practice financial stewardship	The intent of this policy is to practice financial stewardship.	Potentially Consistent. The project would provide funding for numerous off-site roadway improvements as well as various off-site improvements to NCSW water and wastewater infrastructure that would serve the project site and its future tenants.
Policy Objective 7.2. Assure early and continual involvement of all parties affected by major transportation improvement projects and programs.	The intent of this policy is to encourage collaboration in major transportation improvement projects.	Potentially Consistent. The project would provide funding for numerous off-site roadway improvements. These improvements have been identified and designed in coordination with the County Public Works Department, Caltrans, and other responsible agencies.
Policy Objective 7.3. Seek sustainable, flexible, and competitive funding to maintain and improve the transportation system.	The intent of this policy is to secure funding for transportation improvement projects.	Potentially Consistent. The project would provide funding for numerous off-site roadway improvements that would facilitate vehicle traffic generated by the buildout of uses within the Specific Plan Area and maintain applicable standards for safety and vehicle queuing.
Sustainable Communities Strategy		
<i>Community Planning and Development Standards</i>		
<p>2. Support the update and modification of zoning and development standards in downtowns and villages to consider or support (Near):</p> <ul style="list-style-type: none"> • Mixed-use, infill, and residential development, • Reduced vehicle parking requirements, • Increased bicycle parking requirements, • Intensification of land use, and • Modification of setbacks, building height, and size limitations. 	The intent of this policy is to support high-density, mixed-use, and/or transit-oriented development.	Potentially Consistent. The Specific Plan Area is generally surrounded by existing residential land uses and US 101 and would be infill development. The DRSP would establish land use districts for future development of residential land uses, commercial land uses, educational uses, and recreation and open spaces uses.
<i>Housing Options and Affordability</i>		
3. Support residential development near existing employment centers. (Ongoing)	The intent of this policy is to encourage residential development near employment opportunities.	Potentially Consistent. The DRSP would establish land use districts for future development of residential land uses, commercial land uses, educational uses, and recreation and open spaces uses. Future development of commercial uses on-site would provide proximate employment opportunities and goods and services to residents of surrounding on- and off-site neighborhoods.
6. Support expanded housing options for people of all ages and incomes to increase mobility and lower the combined cost of housing and transportation. (Near)	The intent of this policy is to provide a variety of housing opportunities.	Potentially Consistent. One of the goals of the DRSP is to support a variety of housing types to allow a range of opportunities for home ownership and rental options. The DRSP would allow for the future development of Residential Single-Family and Residential Multi-Family uses, a portion of which would be affordable homes consistent with the goals and policies of the County's Housing Element, the County's Inclusionary Housing Ordinance,

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and regional housing needs. In addition, future development of ADUs and JADUs would be allowed on-site.		
<i>Infill Development and Location Efficiency</i>		
8. Support mixed-use and infill development near existing transit services and activity centers. (Ongoing)	The intent of this policy is to support mixed-use, infill, and transit-oriented development.	Potentially Consistent. Public transit stops would be included in the Specific Plan Area to encourage transit use by DRSP residents, employees, and visitors. Collectors A and C have been designed to accommodate a future transit stop within the Village Commercial area just west of the roundabout and at the Park and Ride location along Collector A just south of Willow Road. San Luis Obispo County Regional Transit Authority (RTA) is expected to provide service to and stops within these designated transit hub locations.
10. Support local jurisdictions' zoning changes that establish minimum residential density on appropriate sites along existing commercial and transit corridors. (Ongoing)	The intent of this policy is to encourage higher-density residential uses along commercial and transit corridors.	Potentially Consistent. The DRSP would establish land use districts for future development of residential land uses, including multi-family residential neighborhoods, commercial land uses, educational uses, and recreation and open spaces uses. Public transit stops would be included in the Specific Plan Area to encourage transit use by DRSP residents, employees, and visitors.
<i>Healthy, Livable Communities</i>		
13. Coordinate with local jurisdictions to ensure best practices of incorporating healthy community design in land use, circulation, and health elements of agency general plans. (Ongoing)	The intent of this policy is to encourage healthy community design in land use and circulation planning.	Potentially Consistent. The DRSP proposes a pedestrian trail network to provide recreational opportunities and connect the individual neighborhoods to the commercial and job areas of the site without the need to use an automobile. Approximately 3.8 miles of pedestrian trails would be accessible to residents and the community. The DRSP also includes internal roadway design guidelines that include the provision of bicycle lanes and public spaces with bicycle racks.
15. As part of agency review and comment on specific plans and significant development projects, encourage healthy and livable community design concepts, and incorporation of multimodal transportation options. (Ongoing)	The intent of this policy is to encourage healthy community design in land use and circulation planning.	Potentially Consistent. The DRSP proposes a pedestrian trail network to provide recreational opportunities and connect the individual neighborhoods to the commercial and job areas of the site without the need to use an automobile. Approximately 3.8 miles of pedestrian trails would be accessible to residents and the community. The DRSP also includes internal roadway design guidelines that include the provision of bicycle lanes and public spaces with bicycle racks.
<i>Social Equity</i>		
16. Engage with community members representing the region's disadvantaged communities to better understand long-term housing and transportation concerns and needs. (Near)	The intent of this policy is to provide housing and transportation services to better serve disadvantaged communities.	Potentially Consistent. One of the goals of the DRSP is to support a variety of housing types to allow a range of opportunities for home ownership and rental options. The DRSP would allow for the future development of Residential Single-Family and Residential Multi-Family uses, a portion of which would be affordable homes consistent with the goals

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		<p>and policies of the Housing Element, the County's Inclusionary Housing Ordinance, and regional housing needs. In addition, future development of ADUs and JADUs would be allowed on-site, which would be affordable by design.</p> <p>Public transit stops would be included in the Specific Plan Area to encourage transit use by DRSP residents and employees. Use of transit, in addition to the bicycle infrastructure provided on-site, would provide affordable means of transportation for residents and employees.</p>
<p>17. Support social equity and environmental justice considerations in the implementation of projects and programs. (Near)</p>	<p>The intent of this policy is to support social equity and environmental justice considerations in project and program implementation.</p>	<p>Potentially Consistent. The DRSP would allow for the construction of a minimum of 75 affordable residential units on-site. These units would be located greater than 500 feet from US 101 to minimize potential health impacts associated with vehicle DPM emissions.</p>
<p><i>Land Use Transportation Connection</i></p>		
<p>18. Support local jurisdictions' efforts to direct new and future development to existing downtowns, villages, and commercial corridors. (Ongoing)</p>	<p>The intent of this policy is to focus new development in existing urban and suburban areas.</p>	<p>Potentially Consistent. The project site is located directly adjacent to areas within the existing Nipomo URL and the NCSD service area. The Specific Plan Area is also within the NCSD SOL, which identifies the probable future physical boundary and service area of a local agency or municipality.</p>
<p>19. Support local jurisdictions' efforts to improve connectivity between adjacent land uses. (Ongoing)</p>	<p>The intent of this policy is to improve connectivity between adjacent land uses.</p>	<p>Potentially Consistent. The DRSP proposes a pedestrian trail network to provide recreational opportunities and connect the individual neighborhoods to the commercial and job areas of the site without the need to use an automobile.</p>
<p><i>Parking & Parking Demand Management</i></p>		
<p>23. Support ordinances that reduce required parking and parking reduction strategies that reduce the quantity of off-street parking in downtown and village areas over time. (Near)</p>	<p>The intent of this policy is to reduce the number of off-street parking in downtown and village areas.</p>	<p>Potentially Consistent. The DRSP includes parking requirements, including a standard for when any two or more nonresidential uses are located on a single property, the number of parking spaces may be reduced at a rate of 5% for each nonresidential use, up to a maximum of 20%.</p>
<p>24. Support local jurisdictions' policies that encourage a "park-once" philosophy in downtown and village areas. (Near)</p>	<p>The intent of this policy is to improve connectivity in downtown and village areas.</p>	<p>Potentially Consistent. The DRSP proposes a pedestrian trail network to provide recreational opportunities and connect the individual neighborhoods to the commercial and job areas of the site without the need to use an automobile.</p>
<p>25. Investigate best practices for the implementation of successful in-lieu parking fee programs to provide a financing mechanism for structured parking in downtown areas in concert with policies that reduce the long-term supply of off-street parking in downtown areas. (Near)</p>	<p>The intent of this policy is to reduce off-street parking in downtown areas.</p>	<p>Potentially Consistent. The DRSP includes parking requirements, including a standard for when any two or more nonresidential uses are located on a single property, the number of parking spaces may be reduced at a rate of 5% for each nonresidential use, up to a maximum of 20%.</p>

Goals, Policies, Plans, Programs and Standards	Intent of the Policy in Relation to Avoiding or Mitigating Significant Environmental Impacts	Preliminary Consistency Determination
<p>27. Support roadway corridor plans in downtown and village areas that investigate how to best use existing roadway width relative to traffic demands to assess options of reducing travel lanes and providing additional on-street parking and enhanced pedestrian and bicycle facilities, additional public space, and aesthetic streetscape improvements. (Ongoing)</p>	<p>The intent of this policy is to use roadway widths strategically in downtown and village areas.</p>	<p>Potentially Consistent. The DRSP includes roadway design standards for internal circulation components that would include vehicle lanes, bicycle lanes, emergency access, landscaped buffers, and pedestrian walkways.</p>
<i>Economic Vitality & Jobs-Housing Balance</i>		
<p>31. Support the expansion of the region's supply of housing for renters, first-time home-buyers, and the broader workforce to maintain the vitality of regional economy, by supporting employee recruitment and retention, and new business formation. (Near)</p>	<p>The intent of this policy is to maintain the vitality of the regional economy through housing opportunities and employee benefits.</p>	<p>Potentially Consistent. One of the goals of the DRSP is to support a variety of housing types to allow a range of opportunities for home ownership and rental options. The DRSP would allow for the future development of Residential Single-Family and Residential Multi-family uses, a portion of which would be affordable homes consistent with the goals and policies of the Housing Element, the County's Inclusionary Housing Ordinance, and regional housing needs. In addition, future development of ADUs and JADUs would be allowed on-site, which would be affordable by design.</p> <p>The DRSP would establish land use districts for future development of residential land uses, including multi-family residential neighborhoods, commercial land uses, educational uses, and recreation and open spaces uses. Future commercial retail uses would provide attractive employment opportunities to a diverse workforce due to its proximity to proposed transit stops, bicycle and pedestrian infrastructure, and location next to public park and recreation facilities.</p>
<i>Context Sensitivity</i>		
<p>37. Support context sensitive solutions in all aspects of project development to ensure community concerns are integrated in project design and construction. (Ongoing)</p>	<p>The intent of this policy is to integrate community input into project design and construction.</p>	<p>Potentially Consistent. The project would include numerous off-site roadway and intersection improvements that would mitigate traffic impacts of future development of land uses on-site on surrounding land uses.</p>
<i>Funding Mechanisms</i>		
<p>42. Support modifications in existing mechanisms for financing transportation improvements that will support long-term sustainable land use and transportation development. (Ongoing)</p>	<p>The intent of this policy is to support transportation improvements that support long-term sustainable land use and transportation development.</p>	<p>Potentially Consistent. The project would provide funding for numerous off-site roadway improvements that would facilitate vehicle traffic generated by the buildout of uses within the Specific Plan Area and maintain applicable standards for safety and vehicle queuing.</p>
County of San Luis Obispo Inland Land Use Ordinance (Title 22)		
<p>22.98.072(H)(d) Varied lot pattern and geometry: Design parcels to have varied front dimensions and a different overall geometry, responding to natural topography and the location of natural features such as vegetation, to provide interest and avoid rectilinear grid lot patterns.</p>	<p>The intent of this policy is to design parcels to accommodate unique site features.</p>	<p>Potentially Consistent. The project's list of objectives includes an objective to maintain the large, centrally located oak woodland area as a site feature and to minimize impacts to special-status plants and animals on-site. The DRSP site design has also been designed to</p>

Goals, Policies, Plans, Programs and Standards	Intent of the Policy in Relation to Avoiding or Mitigating Significant Environmental Impacts	Preliminary Consistency Determination
accommodate natural terrain and topography features, such as drainages.		
SLOLAFCO Policies and Procedures		
General Policies		
3. Cities and Special Districts are discouraged from annexations outside of their Sphere of Influence unless the need for services is clearly demonstrated (CKH 56375.5).	The intent of this policy is to discourage annexation of property outside of the SOI.	Potentially Consistent. The project would require annexation into the NCSD service area to facilitate NCSD's provision of water and wastewater services within the Specific Plan Area. The Specific Plan Area is located within the NCSD SOI.
4. Jurisdictions are encouraged to create places to live that integrate various land uses as a way of providing for a diverse social and economic community.	The intent of this policy is to encourage mixed use communities.	Potentially Consistent. The DRSP would establish land use districts for future development of residential land uses, commercial land uses, educational uses, and recreation and open spaces uses.
5. Cities and special districts are encouraged to annex unincorporated islands as well as land that is mostly surrounded by a jurisdiction. (CKH 56001, & 56375.3).	The intent of this policy is to encourage annexations that share boundaries with a jurisdiction.	Potentially Consistent. The project site is located directly adjacent to areas within the existing Nipomo URL and the NCSD service area. The Specific Plan Area is also within the NCSD SOI.
6. The Commission encourages development of vacant land within a municipality over development in fringe areas and discourages strip or noncontiguous annexations to Cities (CKH 56301).	The intent of this policy is to encourage infill development and annexations adjacent to jurisdictions.	Potentially Consistent. The project site is located directly adjacent to areas within the existing Nipomo URL and the NCSD service area. The DRSP Area is also within the NCSD SOI.
7. The Commission prefers urban development within Cities and the Urban Reserve Line of unincorporated communities as opposed to development in the unincorporated area (CKH 56001).	The intent of this policy is to encourage development within planned areas of growth.	Potentially Consistent. The project site is located directly adjacent to areas within the existing Nipomo URL and the NCSD service area. The Specific Plan Area is also within the NCSD SOI. While this policy states that development outside of an existing URL is not preferred, the DRSP's location adjacent to areas within the Nipomo URL and its location within the NCSD SOI make it consistent with the intent of this policy to encourage development within planned areas of growth.
9. The Commission favors annexation to an existing agency over creation of a new agency. When the formation of a new government entity is proposed, the Commission shall make a determination as to whether existing agencies can feasibly provide the service in a more efficient manner (CKH 56301).	The intent of this policy is to encourage annexations into existing agencies.	Potentially Consistent. The project would require annexation into the NCSD service area to facilitate NCSD's provision of water and wastewater services within the Specific Plan Area. The Specific Plan Area is located within the NCSD SOI.
10. The Commission discourages special districts from extending services by agreement without annexation. A municipality or district may provide new or extended services by contract or agreement outside its boundaries only if it requests and receives written approval from LAFCO (CKH 56133).	The intent of this policy is to encourage annexations into agencies for areas within their service area.	Potentially Consistent. The project would require annexation into the NCSD service area to facilitate NCSD's provision of water and wastewater services within the Specific Plan Area. The Specific Plan Area is located within the NCSD SOI.
14. In any proposal, the impacts on affordable housing must be considered. The Commission will consider the impact of the creation of new jobs on affordable housing stock, not only in the jurisdiction to which the	The intent of this policy is to consider the effects of a project on affordable housing.	Potentially Consistent. The DRSP would allow for the construction of a minimum of 75 affordable residential units on-site.

Goals, Policies, Plans, Programs and Standards	Intent of the Policy in Relation to Avoiding or Mitigating Significant Environmental Impacts	Preliminary Consistency Determination
annexation is proposed, but also in neighboring jurisdictions. The agency to which the annexation is proposed should demonstrate to the Commission that the effects of the proposed project on affordable housing have been mitigated (CKH 56001).		
18. The Commission shall give "great weight" to a proposal that is supported by a community's long-range vision for its growth and development. This may include a Memorandum of Agreement that has been approved by the County and another jurisdiction regarding a Sphere of Influence or other proposal.	The intent of this policy is to consider a community's long-range vision in annexation determinations.	Potentially Consistent. The DRSP is located within the same property as the Canada Ranch Specific Plan Area, which is described in the County Land Use Element as an area for future growth of commercial and residential uses.
Policies for Annexation to Special Districts		
1. A demonstrated need exists for the required services and there is no reasonable alternative manner of providing these services.	The intent of this policy is to ensure the necessity of the annexation.	Potentially Consistent. The project would require annexation into the NCSD service area to facilitate the NCSD's provision of water and wastewater services within the Specific Plan Area. No other water or wastewater service providers could serve the project site. The DRSP is within the NCSD SOI.
2. The proposed annexation represents a logical and reasonable expansion of the district.	The intent of this policy is to ensure proposed annexation is logical and reasonable for the district.	Potentially Consistent. The DRSP is within the NCSD SOI. The project would require annexation into the NCSD service area to facilitate the NCSD's provision of water and wastewater services within the Specific Plan Area. No other water or wastewater service providers could serve the project site.
3. The proposed annexation reflects the plans of the adjacent governmental agencies.	The intent of this policy is to ensure proposed annexation is coordinated with adjacent governmental agencies.	Potentially Consistent. Numerous responsible agencies have been consulted and conferred with on the project, including, but not limited to, Caltrans, SLOCOG, and CAL FIRE.
4. The proposed annexation does not represent an attempt to annex only revenue producing property.	The intent of this policy is to ensure annexation is not financially discriminatory.	Potentially Consistent. The project would require annexation of the entire Specific Plan Area into the NCSD service area to facilitate the NCSD's provision of water and wastewater services within the Specific Plan Area. No other water or wastewater service providers could serve the project site. The DRSP is within the NCSD SOI.
5. The proposed boundaries must be definite and certain and conform to lines of assessment whenever possible.	The intent of this policy is to ensure the finality of the annexation.	Potentially Consistent. The boundaries of the proposed annexation area are definite.
6. The district has the capability of meeting the need for services and has submitted studies and information documenting its capabilities.	The intent of this policy is to ensure the district has capacity to serve the proposed annexed area.	Potentially Consistent. Buildout of the Specific Plan Area would require a number of off-site water and wastewater system improvements to the existing NCSD service systems. These improvements would be funded by the project developer.

4.11.3 Thresholds of Significance

The determinations of significance of project impacts are based on applicable policies, regulations, goals, and guidelines defined by CEQA and the County. Specifically, the project would be considered to have a significant effect on land use and planning if the effects exceed the significance criteria described below:

- a. Physically divide an established community.
- b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Each of these thresholds is discussed under Section 4.11.5, *Project-Specific Impacts and Mitigation Measures*, below.

4.11.4 Impact Assessment and Methodology

Sources utilized in the assessment of land use and planning impacts include the General Plan, LUO, Bikeways Plan, SLOCOG 2019 RTP, San Luis Obispo County MJHMP, SLOLAFCO policies and procedures, and NCSO 2018 Strategic Plan, as well as available geographic data provided by the County.

The project’s potential consistency with relevant plans and policies is evaluated in Section 4.11.2.4, *Consistency with Plans and Policies*. Only project elements that have the potential to conflict with an applicable goal, policy, or program are evaluated further in this section. Based on State CEQA Guidelines, inconsistency with an adopted policy does not constitute an impact unless it may cause either a direct or indirect physical change in the environment, or a reasonably foreseeable physical change in the environment (Section 21065). Therefore, the analysis provided in this section focuses on the goals, plans, policies, and programs that the project may potentially be inconsistent with and the potential physical impacts on the environment that may result from those potential inconsistencies.

4.11.5 Project-Specific Impacts and Mitigation Measures

WOULD THE PROJECT PHYSICALLY DIVIDE AN ESTABLISHED COMMUNITY?

Specific Plan Area

LUP Impact 1: The project would not physically divide an established community. Impacts would be less than significant (Class III).

As described in the project IS/NOP, the project would not result in the removal or blockage of any existing public roadways or other travel patterns and would not otherwise include any features that would physically divide an established community. The Specific Plan Area is located on the northern fringe of the community of Nipomo and would provide improved regional access through the site to Willow Road. Therefore, the project would not physically divide an established community and potential impacts would be *less than significant*.

LUP Impact 1 (Class III)
The project would not physically divide an established community.
<i>Mitigation Measures</i>
<i>Mitigation is not necessary.</i>

LUP Impact 1 (Class III)
Residual Impacts
<i>Potential impacts associated with physically dividing an established community would be less than significant (Class III).</i>

Off-Site Improvements

LUP Impact 2: Off-site improvements would not physically divide an established community. Impacts would be less than significant (Class III).

Buildout of the Specific Plan Area would require a number of off-site transportation, water, and wastewater system improvements to existing surrounding roadways and the existing NCS D service systems. While these improvements have not been designed and their precise locations are not currently known, all off-site water and wastewater system improvements are expected to occur within existing paved roadways, existing public ROW areas, and/or existing NCS D facilities. Implementation of these improvements may require future temporary road or lane closures, but no permanent road closures or other major modifications to existing circulation patterns would result from the proposed off-site transportation, water, and wastewater system improvements. Therefore, proposed off-site improvements would not physically divide an established community and potential impacts would be *less than significant*.

LUP Impact 2 (Class III)
Off-site improvements would not physically divide an established community.
Mitigation Measures
<i>Mitigation is not necessary.</i>
Residual Impacts
<i>Potential impacts associated with physically dividing an established community would be considered less than significant (Class III).</i>

WOULD THE PROJECT CAUSE A SIGNIFICANT ENVIRONMENTAL IMPACT DUE TO A CONFLICT WITH ANY LAND USE PLAN, POLICY, OR REGULATION ADOPTED FOR THE PURPOSE OF AVOIDING OR MITIGATING AN ENVIRONMENTAL EFFECT?

Based on the evaluation of the project’s potential consistency with relevant plans and policies in Chapter 4, *Environmental Impacts Analysis*, of this EIR, the project would have the potential to result in inconsistencies with applicable policies pertaining to air quality, biological resources, GHG emissions, transportation, land use and planning, public services, and recreation. Potential environmental impacts that could result from inconsistency with these policies are identified in Table 4.11-4 and evaluated below.

Table 4.11-4. Policies for which the Project would be Potentially Inconsistent With

Policies	Project Consistency
SLOAPCD Clean Air Plan	
Land Use Planning Strategies	
<p>L-3 Balancing Jobs and Housing. Within cities and unincorporated communities, the gap between the availability of jobs and housing should be narrowed and should not be allowed to expand.</p>	<p>Potentially Inconsistent. The proposed project is located within the NCSO SOI. Nipomo is an unincorporated area with a jobs/housing imbalance characterized by a shortage of jobs compared to the number of housing units. The project would result in the creation of 1,441 dwelling units (including potential ADUs) and approximately 273 new jobs, which would increase the gap between jobs and housing. Deterioration in a jobs-to-housing imbalance would be anticipated to hinder local and regional improvements related to increased transportation mobility and potential increase in VMT. Although the DRSP would include commercial uses and infrastructure to promote the use of public transit and walking and bicycling (e.g., Park and Ride lot, transit service expansion, connections to bicycle lane network), it would remain potentially inconsistent with this measure.</p>
County of San Luis Obispo General Plan	
Conservation and Open Space Element	
<p>GOAL 2. The natural and historic character and identity of rural areas will be protected.</p>	<p>Potentially Inconsistent. The project would inherently change the visual character of the site and surroundings through the introduction of commercial, institutional, and residential development; the removal of over 4,000 mature oak trees; and substantial landform alteration.</p>
<p>Policy VR 2.1 Develop in a manner compatible with Historical and Visual Resources. Through the review of proposed development, encourage designs that are compatible with the natural landscape and with recognized historical character, and discourage designs that are clearly out of place within rural areas.</p>	<p>Potentially Inconsistent. The project would be inconsistent with the existing rural visual character of the site and surrounding natural landscape through the introduction of commercial, institutional, and residential development, the removal of over 4,000 mature oak trees, and substantial landform alteration.</p>
<p>Policy VR 2.2 Site development and landscaping sensitivity. Through the review of proposed development, encourage designs that emphasize native vegetation and conform grading to existing natural forms. Encourage abundant native and/or drought-tolerant landscaping that screens buildings and parking lots and blends development with the natural landscape. Consider fire safety in the selection and placement of plant material, consistent with Biological Resources Policy BR 2.7 regarding fire suppression and sensitive plants and habitats.</p>	<p>Potentially Inconsistent. Although the project site would preserve the existing oak ridge, it would severely alter the existing native vegetation and natural landforms of the remainder of the site with the introduction of commercial, institutional, and residential development; the removal of over 4,000 mature oak trees, and substantial landform alteration.</p>
<p>Policy AQ 1.2 Reduce vehicle miles traveled. Require projects subject to discretionary review to minimize additional vehicle travel.</p>	<p>Potentially Inconsistent. Buildout of the DRSP would result in an increase in overall regional VMT and would generate VMT per employee above local significance thresholds even with implementation of Mitigation Measure TR/mm-3.1.</p>
<p>Goal BR 1. Native habitat and biodiversity will be protected, restored, and enhanced.</p>	<p>Potentially Inconsistent. The project would result in significant impacts to special-status plant species and sensitive natural communities that would constitute a net loss of species and habitat diversity in the county. The 1:1 mitigation ratio in Mitigation Measure BIO/mm-4.1 for California spineflower, sand buck brush, and sand almond would constitute a net loss for these species. Of the 3,943 oak trees to be removed, the mitigation only requires the applicant to plant replacement trees for 194 of the trees being removed. At this level, this is a significant net loss of oak trees and acreage of oak woodlands in the county.</p>

Policies	Project Consistency
<p>Policy BR 1.2 Limit development impacts. Regulate and minimize proposed development in areas that contain essential habitat for special-status species, sensitive natural communities, wetlands, coastal and riparian habitats, and wildlife habitat and movement corridors as necessary to ensure the continued health and survival of these species and protection of sensitive areas.</p>	<p>Potentially Inconsistent. The proposed development would require mitigation for impacts to special-status species through the preservation and restoration of off-site occupied habitat areas (Mitigation Measures BIO/mm-2.1 through BIO/mm-2.4, BIO/mm-4.1, and BIO/mm-16.1). However, suitable off-site habitat areas may not exist; therefore, the impact could potentially prevent the continued health and survival of species such as the Nipomo Mesa ceanothus or mesa horkelia. In addition, the 1:1 mitigation ratio in Mitigation Measure BIO/mm-4.1 would constitute a net loss for the species. The proposed development will not disrupt known major wildlife movement corridors. Mitigation Measure BIO/mm-16.1 would prevent impacts to wetlands and other aquatic habitat from the installation of off-site water improvements. There are no other wetland or riparian habitats on the main project site.</p>
<p>Policy BR 1.4 No Net Loss. Require that development projects are approved with conditions and mitigation measures to ensure the protection of sensitive resources and to achieve "no net loss" of sensitive habitat acreage, values, and function. Give highest priority to avoidance of sensitive habitat. When avoidance is not feasible, require provision of replacement habitat onsite through restoration and/or habitat creation. When onsite mitigation is not feasible, provide for offsite mitigation that reflects no net loss.</p>	<p>Potentially Inconsistent. The project would result in significant impacts to special-status plant species and sensitive natural communities that would constitute a net loss of species and habitat diversity in the county. The 1:1 mitigation ratio in Mitigation Measure BIO/mm-4.1 for California spineflower, sand buck brush, and sand almond would constitute a net loss for these species. Of the 3,943 oak trees to be removed, the mitigation only requires the applicant to plant replacement trees for 194 of the trees being removed. At this level, this is a significant net loss of oak trees and acreage of oak woodlands in the county. Although significant resources would be permanently protected off-site at Dana Ridge, the preservation of similar resources would not compensate for the loss of resources on-site and a net loss would still occur.</p>
<p>Policy BR 1.9 Preserve Ecotones. Require that proposed discretionary development protects and enhances ecotones, or natural transitions between habitat types because of their importance to vegetation and wildlife. Ecotones of particular concern include those along the margins of riparian corridors, baylands and marshlands, vernal pools, and woodlands and forests where they transition to grasslands and other habitat types.</p>	<p>Potentially Inconsistent. It is currently unknown whether it would be feasible to locate and preserve coast live oak woodland within the range of Burton Mesa chaparral, as required by Mitigation Measure BIO/mm 13, because that combination of habitats is not a common occurrence. It is within this unique transitional area were certain special-status plant species thrive. Similar ecotones will be preserved on the Dana Ridge Mitigation Site, but it does not preserve the same habitat types or support the same woodland species.</p>
<p>Policy BR 2.6 Development Impacts to Listed Species. Ensure that potential adverse impacts to threatened, rare, and endangered species from development are avoided or minimized through project siting and design. Ensure that proposed development avoids significant disturbance of sensitive natural plant communities that contain special-status plant species or provide critical habitat to special-status animal species. When avoidance is not feasible, require no net loss of sensitive natural plant communities and critical habitat areas.</p> <p>Implementation Strategy BR 2.6.1. Use of biological resource surveys. Require applications for discretionary projects and land divisions to provide a biological resource survey performed by a qualified biologist when needed to address special-status animal and plant species and their associated habitats.</p> <p>Implementation Strategy BR 2.6.2. Use of habitat preservation ratio. Where avoidance, restoration, or replacement of habitat of special status species is not feasible, require preservation and/or enhancement of similar habitat at a minimum 2:1 ratio to avoid significant cumulative loss of valuable habitats and to achieve no net loss of habitat value.</p> <p>Implementation Strategy BR 2.6.3. Use of easements to protect habitat. Obtain easements or dedications to protect habitat, especially where it is connected to other large areas of unique or sensitive habitat. Natural open space areas in development projects should be contiguous to natural areas adjacent to the site wherever possible.</p>	<p>Potentially Inconsistent. The 1:1 mitigation ratio specified in Mitigation Measure BIO/mm 4.1 is inconsistent with County COSE Policy BR 2.6 and constitutes a net loss for the species. In addition, there is a lack of information about the cultural requirements to successfully propagate California spineflower at a large scale and sand almond propagation is very difficult. Because the feasibility of successfully implementing this mitigation, residual impacts would be significant and unavoidable. Therefore, the project would be potentially inconsistent with this policy.</p>

Policies	Project Consistency
<p>Implementation Strategy BR 2.6.4. Use of habitat banking or TDC program. As an alternative to onsite mitigation and habitat protection, consider participation in an established habitat banking or Transfer of Development Credit (TDC) program if the project meets the criteria of the program.</p> <p>Implementation Strategy BR 2.6.5. Habitat banking program. Evaluate the development of a habitat-banking program to mitigate the effects of development on unique or sensitive habitat.</p>	
<p>Goal BR 3 Maintain the acreage of native woodlands, forests, and trees at 2008 levels.</p>	<p>Potentially Inconsistent. Of the 3,943 oak trees to be removed, the mitigation only requires the applicant to plant replacement trees for 194 of the trees being removed. At this level, this is a significant net loss of oak trees and acreage of oak woodlands in the county.</p>
<p>Policy BR 3.1 Native tree protection. Protect native and biologically valuable trees, oak woodlands, trees with historical significance, and forest habitats to the maximum extent feasible.</p>	<p>Potentially Inconsistent. The project would result in significant unavoidable impacts to oak woodlands that would constitute a significant loss in the biological value of oak woodlands in the county.</p>
<p>Policy BR 3.2 Protection of native trees in new development. Require proposed discretionary development and land divisions to avoid damage to native trees (e.g., Monterey Pines, oaks) through setbacks, clustering, or other appropriate measures. When avoidance is not feasible, require mitigation measures.</p> <p>Implementation Strategy BR 3.2.1. Tree replacement in new development. If avoidance of damage to native specimen trees is not feasible in discretionary land use permits and land divisions, require mitigation measures such as tree replacement using native stock at specified ratios, replanting plans, reseeding disturbed open areas with native, drought, and fire resistant species. A long-term monitoring plan will also be required.</p>	<p>Potentially Inconsistent. The project would result in the removal of 3,943 native oak trees. Of the 3,943 oak trees to be removed, the mitigation only requires the applicant to plant replacement trees for 194 of the trees being removed. At this level, this is a significant net loss of oak trees and acreage of oak woodlands in the county.</p>
<p>Policy BR 3.3 Oak Woodland Preservation. Maintain and improve oak woodland habitat to provide for slope stabilization, soil protection, species diversity, and wildlife habitat.</p> <p>Implementation Strategy BR 3.3.1. Implement Oak Woodlands Preservation Act. Comply with the Oak Woodlands Preservation Act (PRC Section 21083.4) through the review of proposed discretionary development by maintaining the integrity and diversity of oak woodlands, chaparral communities, and other significant vegetation.</p>	<p>Potentially Inconsistent. In order to maintain the diversity of oak woodlands in the county, per County COSE Policy BR 3.3.1, mitigation for coast live oak woodlands should occur adjacent to the conservation/restoration of Burton Mesa chaparral. However, it is currently unknown whether it would be feasible to locate and preserve coast live oak woodland within the range of Burton Mesa chaparral, as required by Mitigation Measure BIO/mm-14.1, because that combination of habitats is not a common occurrence.</p>
<p>Parks and Recreation Element</p>	
<p>Policy 2.2 When acquiring parkland or considering the acceptance of a parkland donation give first priority to sites that would:</p> <ol style="list-style-type: none"> 1. Augment needed park or recreation opportunities as defined in this Element. 2. Serve a good mix of users at a reasonable cost. 3. Provide an appreciable amount of parkland or recreation as a result of being adjacent to a compatible site, such as a school. 4. Allow development in a reasonable time period. The County should not obtain lands that have extensive permit and mitigation requirements that may conflict with the project's proposed use(s) or County policy. 5. Serve an important existing or future need. The site should be able to be developed consistent with that need. 6. Accommodate planned uses in terms of size, location, and existing constraints. The property should be largely devoid of constraints or hazards. 	<p>Potentially Inconsistent. The County Parks and Recreation Department (County Parks) has commented that the proposed park would not meet an identified need due to its size, lack of park facilities, and proximate location to the existing Nipomo Community Park. However, the park would serve a good mix of users from within the Dana Reserve and would provide an appreciable amount of parkland adjacent to a compatible use, such as the childcare facility proposed in the park concept plan or surrounding affordable or workforce housing.</p> <p>County Parks has commented that the park would not serve an important existing or future need and that the proposed park site is too small and encumbered with drainage features that should not count toward acres used for park land. The applicant has requested a Quimby Fee credit for conveyance of the park land to the County. However, County Parks has stated that a waiver of Quimby fees would mean the long-term maintenance of the park would not be adequately accommodated.</p>

Policies	Project Consistency
<p>7. Adequately accommodate long-term maintenance.</p> <p>Concentrate park acquisition efforts on sites larger than ten acres, except when (a) the proposal is for a linear park connecting important community components or providing key alternative transportation (such as a link between two schools), (b) a proposed park provides the only available park site in a community, (c) another agency will provide maintenance for the park, or (d) a smaller parcel has outstanding characteristics or unique features.</p>	
<p>Goal 2. Objective B. Provide new and expanded recreation within the County consistent with Chapter 8 Parks and Recreation Project List, and the County’s available funding.</p>	<p>Potentially Inconsistent. The DRSP includes the development of new on-site recreational facilities, including pedestrian, bicycle, and equestrian trails; 8.5 to 12 acres of pocket parks within proposed neighborhoods; a 10-acre public park; a 1-acre equestrian trailhead; and 49.8 acres of open space areas. However, the project is requesting a Quimby Fee credit for dedication of the park land. County Parks has indicated it would not have available funding to provide ongoing maintenance of proposed public recreational facilities.</p>
<p>Policy 6.4. Prior to accepting or developing a new park, County Parks shall determine the long-term maintenance and operating costs associated with the proposed project. The County shall not develop the park until adequate funds are available for maintenance.</p>	<p>Potentially Inconsistent. The project includes the construction of a 10-acre public park to be maintained by the County. Based on correspondence with County Parks, adequate funding for the long-term maintenance of the new public park has not been secured. Therefore, the project may be inconsistent with this policy.</p>
<p>Policy 6.9. County Parks should not undertake maintenance responsibilities better handled by another body. For example, facilities within private development (such as mini-parks, basin parks, mitigation areas, open space, and short segments of trails) shall be maintained by a homeowner’s association or a similar entity.</p>	<p>Potentially Inconsistent. As proposed, the DRSP HOA would maintain pocket parks and open space areas; however, the public park would be maintained by the County. Based on correspondence with County Parks, adequate funding for the long-term maintenance of the new public park has not been secured. Therefore, the project may be inconsistent with this policy.</p>
<p>Policy 6.10. If County maintenance funding is inadequate to provide all park types, concentrate new park acquisition on regional park lands since these parks serve the largest number of users and are the least costly for the County to maintain.</p>	<p>Potentially Inconsistent. The project includes development of a new public neighborhood park. Based on correspondence with County Parks, adequate funding for the long-term maintenance of the new public park has not been secured. The project proposes a neighborhood (rather than regional) park. Therefore, the project may be inconsistent with this policy.</p>
<p>Framework for Planning (Inland)</p>	
<p><i>Planning Principles, Policies, and Implementing Strategies</i></p>	
<p>Principal 1, Policy 1. Preserve open space, scenic natural beauty, and natural resources. Conserve energy resources. Protect agricultural land and resources.</p> <p>Maintain rural areas in agriculture, low-intensity recreation, very low-density residential uses, and open space uses that preserve and enhance a well-defined rural character.</p>	<p>Potentially Inconsistent. Although the project would preserve the existing oak ridge, the project would inherently change the visual character of the site and surroundings through the introduction of commercial, institutional, and residential development; the removal of over 4,000 mature oak trees; and substantial sensitive habitat loss and landform alteration.</p>
<p>Principal 1, Policy 2. Keep the amount, location and rate of growth allowed by the Land Use Element within the sustainable capacity of resources, public services, and facilities.</p> <p>Implementation Strategy 4. Direct the extension of urban services (water, sewers, police services, fire protection, parks, ambulance, libraries, etc.) to areas within urban and village reserve lines and restrict urban services from being provided outside urban or village areas.</p>	<p>Potentially Inconsistent. Although the project, as mitigated, was determined to be within the sustainable capacity of resources, the project proposes provision of multiple urban services (public park, roads, fire station location, extension of water, wastewater, and solid waste services, etc.) to areas outside of the Nipomo URL and NCSA service area.</p>

Policies	Project Consistency
<p>Principal 2, Policy 1. Maintain rural areas in agriculture, low-intensity recreation, very low-density residential uses, and open space uses that preserve and enhance a well-defined rural character.</p>	<p>Potentially Inconsistent. Although the Specific Plan area is planned for development in the County's existing General Plan, and the project would preserve the existing oak ridge, the project would inherently change the visual character of the site and surroundings through the introduction of commercial, institutional, and residential development; the removal of over 4,000 mature oak trees; and substantial sensitive habitat loss and landform alteration.</p>
<p>Principal 2, Policy 2. Avoid establishing or expanding Residential Rural and Residential Suburban areas outside urban or village reserve areas.</p>	<p>Potentially Inconsistent. The project would include designation of Residential Single-Family and Residential Multi-Family land use zones within the Specific Plan Area. The Specific Plan Area is currently not located within the Nipomo URL.</p>
<p>County of San Luis Obispo Land Use Ordinance</p>	
<p><i>22.10.095 – Highway Corridor Design Standards</i></p>	
<p>D. 5. Project Design and processing – Discretionary permit applications. Minor Use Permit approval is required for projects subject to Subsection D.4 that are unable to meet the requirements for a Zoning Clearance in Standards D.4.c through D.4.h. Minor Use Permit and any Conditional Use Permit applications that may otherwise be required by this Title shall include a visual analysis that is prepared by a registered architect, landscape architect, or other qualified individual acceptable to the Environmental Coordinator. The visual analysis shall be utilized to determine compliance with the intent of D.4 and the following:</p> <ol style="list-style-type: none"> a. Locate development, including access roads, in the least visible portion of the site consistent with the protection of other resources, as viewed from Highway 101, unless mitigated to insignificant levels. Use existing vegetation and topographic features to screen development from view as much as possible. b. Minimize grading for both structures and roads that would create cut and fill slopes visible from Highway 101. c. Minimize building height and mass by using low-profile design where applicable. Minimize the visual impacts of buildings by using colors that blend with surrounding natural colors and/or screen the building from view. d. Provide landscaping to screen and buffer both road and building development with native or drought-resistant plants, including the extensive use of trees and large-growing shrubs. e. Use of minimal signage is encouraged. Locate signs that are subject to a discretionary land use permit so that they minimize interference with important public views from Highway 101, such as those listed in the preamble to this section. 	<p>Potentially Inconsistent. The project would inherently change the visual character of the site and surroundings through the introduction of roads, commercial, institutional, and residential development; the removal of over 4,000 mature oak trees; and substantial landform alteration within highly visible locations as seen from US 101. Mitigation Measure AES/mm-3.2 would require implementation of a Visual Screening Zone along the length of the project site adjacent to the required utility easement and US 101, for the purpose of reducing visibility of the development and minimizing visual impacts to the vegetated visual character of the site and its surroundings as seen from the highway. The proposed landscaping would, by necessity, be more urban in appearance and would likely take several decades to provide meaningful restoration of the vegetative character and quality of the site.</p>

Policies	Project Consistency
South County Inland Area Plan	
<i>Public Facilities, Services, and Resources</i>	
Secure adequate means of generating revenues that can provide necessary public resources, services, and facilities to better serve the existing population as well as future growth.	Potentially Inconsistent. The project would result in an increased demand on fire protection services, police protection services, existing school district facilities, and library services. The demand on police protection services, existing school district facilities, and library services would be offset through payment of Public Facilities Fees and fees paid directly to the Lucia Mar School District. Additionally, the need for fire protection services, which would be offset through mitigation requiring the provision of land for future development of a new fire station. However, the applicant is requesting to waive the payment of Quimby Fees based on the dedication of a public park, which may be inconsistent with this policy.
Projects resulting from general plan amendments and urban expansion shall fund their share of public resources, services and facilities to the limits allowed by law.	Potentially Inconsistent. The project would result in an increased demand on fire protection services, police protection services, existing school district facilities, and library services. The demand on police protection services, existing school district facilities, and library services would be offset through payment of Public Facilities Fees and fees paid directly to the Lucia Mar School District. Additionally, the need for fire protection services, which would be offset through mitigation requiring the provision of land for future development of a new fire station. However, the applicant is requesting to waive the payment of Quimby Fees based on the dedication of a public park, which may be inconsistent with this policy.
Evaluate the financial capability of service providers to accommodate additional growth by reviewing capital improvement plans before urban expansion or major projects are approved.	Potentially Inconsistent. The project would offset the increased demand on fire protection, police protection, and library services through the payment of Public Facilities Fees. The project will also pay school impact fees to the LMUSD to offset its impact on school facilities. However, the applicant is requesting to waive the payment of Quimby Fees based on the dedication of a public park, which may be inconsistent with this policy. The capacity of service providers to accommodate additional growth associated with buildout of the Specific Plan Area has been evaluated in this EIR.
<i>South County (South) Sub-area</i>	
Guideline: Retain land in open space in new land divisions that will preserve oak woodlands, riparian and other important biological habitats, and historic place surroundings.	Potentially Inconsistent. Although the project would preserve the existing oak ridge, the project would inherently change the visual character of the site and surroundings through the introduction of commercial, institutional, and residential development; the removal of over 4,000 mature oak trees; and substantial sensitive habitat loss and landform alteration.
Primary Goals	
4. The rural character and heritage of South County with a strong sense of identity and place.	Potentially Inconsistent. Although the project would preserve the existing oak ridge, the project would inherently change the visual character of the site and surroundings through the introduction of commercial, institutional, and residential development; the removal of over 4,000 mature oak trees; and substantial sensitive habitat loss and landform alteration.
6. The long-term sustainability of natural resources as growth occurs with sensitivity to the natural and built environment.	Potentially Inconsistent. Although the project would preserve the existing oak ridge, the project would inherently change the visual character of the site and surroundings through the introduction of commercial, institutional, and residential development; the removal of over 4,000 mature oak trees; and substantial sensitive habitat loss and landform alteration.

Policies	Project Consistency
Supportive Goals	
<p>Environment. 1. Promote the protection of natural resources and encourage the following in new development proposals:</p> <ul style="list-style-type: none"> a. Retention of sensitive vegetation. d. Blending of new structures into the surrounding environment and minimal visual impacts in areas considered to be scenic. e. Protection of cultural and historic resources. f. Separation of new residential development from adjacent commercial agricultural and industrial operations. 	<p>Potentially Inconsistent. Although the project would preserve the existing oak ridge, the project would inherently change the visual character of the site and surroundings through the introduction of commercial, institutional, and residential development; the removal of over 4,000 mature oak trees; and substantial sensitive habitat loss and landform alteration.</p>
San Luis Obispo County Inland Land Use Ordinance (Title 22)	
<p>22.98.072(H)(f) Siting of Buildings: Locate building envelopes that are subordinate to rural character, such as by varying their elevation along hills and ridges, and where siting below the highest elevations takes advantage of wind-protected locations.</p>	<p>Potentially Inconsistent. The project would not affect existing public views of the Temettate Ridge to the east. The project would preserve the existing oak ridge within the site. The locations, massing, and density of future on-site development, however, would dominate views along US 101 and limit views of the oak ridge.</p>
Sustainable Communities Strategy	
Infill Development and Location Efficiency	
<p>8. Support mixed-use and infill development near existing transit services and activity centers. (Ongoing)</p>	<p>Potentially Inconsistent. The DRSP proposes a mix of residential, commercial, and open space uses outside of the existing Nipomo URL. The Specific Plan area is located adjacent to the Nipomo URL in an area planned for growth, including expansion of transit service, and is generally surrounded by existing residential development; however, the project does not propose infill development and does not promote location efficiency.</p>

Specific Plan Area

LUP Impact 3: The project would adversely affect the local jobs-to-housing ratio within the project area and would be inconsistent with Land Use Planning Policy L-3 of the San Luis Obispo County Clean Air Plan. Impacts would be significant and unavoidable (Class I).

The project would result in the creation of 1,441 dwelling units and approximately 273 new jobs, which would increase the gap between jobs and housing in the community of Nipomo. The proposed project would potentially be inconsistent with Land Use Planning Policy L-3 of the SLOAPCD Clean Air Plan because implementation of the proposed project would further divide the jobs-to-housing ratio within the project area. As described in Section 4.14, *Population and Housing*, an imbalance between jobs and housing has the potential to result in a range of adverse environmental impacts, including:

- increased vehicle commute distances and time (VMT);
- increased energy consumption, GHG emissions, and air pollutant emissions from additional commuters; and
- indirect impacts on other communities that build housing, such as loss of habitat.

Based on an evaluation of the project objectives, no feasible mitigation has been identified that would reduce this significant impact while maintaining consistency with most of the project objectives.

Therefore, potential impacts associated with inconsistency with Policy L-3 would be *significant and unavoidable*.

LUP Impact 3 (Class I)
<i>The project would adversely affect the local jobs-to-housing ratio within the project area and would be inconsistent with Land Use Planning Policy L-3 of the San Luis Obispo County Clean Air Plan.</i>
Mitigation Measures
<i>No feasible mitigation has been identified.</i>
Residual Impacts
<i>Potential impacts associated with policy inconsistency would be significant and unavoidable (Class I).</i>

LUP Impact 4: The project would result in an increase in regional VMT and would generate VMT per employee above applicable thresholds; therefore, the project would be potentially inconsistent with Policy AQ 1.2 of the County of San Luis Obispo General Plan Conservation and Open Space Element. Impacts would be less than significant with mitigation (Class II).

Policy AQ 1.2 of the County COSE identifies the need for the reduction in VMT and requires discretionary projects to minimize VMT. The proposed project would be potentially inconsistent with Policy AQ 1.2 because the project’s estimated VMT per employee and residential VMT per capita are higher than the regional averages and that the project would generate an increase in regional VMT. Mitigation Measure TR/mm-2.1 has been identified to require implementation of a variety of transportation demand management strategies and transit system improvement management strategies to reduce and minimize project-generated VMT. While implementation of these measures is not certain to reduce project VMT below applicable project thresholds, and implementation of the project would still result in an increase in regional VMT, these reduction measures would minimize project VMT to the greatest extent feasible and would therefore be consistent with the intent of Policy AQ 1.2. Therefore, potential impacts associated with potential inconsistency with County COSE Policy AQ 1.2 would be *less than significant with mitigation*.

LUP Impact 4 (Class II)
The project would result in an increase in regional VMT and would generate VMT per employee above applicable thresholds; therefore, the project would be potentially inconsistent with Policy AQ 1.2 of the County of San Luis Obispo General Plan Conservation and Open Space Element.
Mitigation Measures
<i>Implement Mitigation Measure TR/mm-2.1.</i>
Residual Impacts
<i>With implementation of Mitigation Measure TR/mm-2.1, potential impacts associated with inconsistency with County COSE Policy AQ 1.2 would be less than significant with mitigation (Class II).</i>

LUP Impact 5: The project would result in the net loss of CRPR 4 and Watch List plant species, native oak woodland, and sensitive habitats; therefore, the project would be potentially inconsistent with goals and policies of the County of San Luis Obispo General Plan Conservation Open Space Element pertaining to preservation of biological resources and Policy 3.8 of the Parks and Recreation Element. Impacts would be significant and unavoidable (Class I).

As described in Table 4.11-4, the project would be potentially inconsistent with County COSE Goal BR 1, Policy 1.2, BR Policy 1.4, BR Policy 1.9, Policy BR 2.6, Goal BR 3, Policy BR 3.1, Policy BR 3.2, Policy BR 3.3, and several Implementation Strategies set forth in the County COSE.

Policy BR 1.4 in the COSE requires mitigation for development projects to achieve “no net loss” of sensitive habitat acreage, values, and function and Goal BR 3 is to maintain the acreage of native woodlands, forests, and trees at 2008 levels. As described in Section 4.4, *Biological Resources*, the project would result in the removal of 3,943 native oak trees. Of the 3,943 oak trees to be removed, the mitigation only requires the applicant to plant replacement trees for 194 of the trees being removed. At this level, this is a significant net loss of oak trees and acreage of oak woodlands in the county. The project would also result in significant impacts to special-status plant species and sensitive natural communities that would constitute a net loss of species and habitat diversity in the county. The 1:1 mitigation ratio in Mitigation Measure BIO/mm-4.1 for California spineflower, sand buck brush, and sand almond would constitute a net loss for these species.

Policy BR 3.3.1 requires the County to maintain the integrity and diversity of oak woodlands, chaparral communities, and other significant vegetation as part of the compliance with the Oak Woodlands Preservation Act (PRC Section 21083.4). The species composition of the coast live oak woodland in the project area contains the same species characteristic of the Burton Mesa chaparral vegetation community on-site. The understory vegetation on the mitigation parcel is distinctly different and does not support the special-status species that occurs on-site. That is because the soils and elevation range of the mitigation parcel is significantly different than the Dana Reserve project area. Without proper in-kind preservation and restoration of coast live oak woodland habitat on similar soil types and in an elevation range similar to the project area, the mitigation would not be able to maintain the diversity of oak woodland communities in the county.

Policy 3.8 of the County Parks and Recreation Element states that trail projects shall be built to minimize impacts to sensitive resources. As described in Section 4.4., *Biological Resources*, the project, including the associated proposed pedestrian and equestrian trail system, would result in significant and unavoidable net loss of sensitive biological resources.

Mitigation measures have been identified in Section 4.4, *Biological Resources*, to reduce, minimize, and compensate for the project’s impacts to sensitive biological resources. However, not all impacts to biological resources would be able to be mitigated to a level of less than significant and would still have the potential to be inconsistent and/or conflict with policies identified in the County COSE and Parks and Recreation Element. The project’s inconsistency with these goals, policies, and implementation strategies identified in the County COSE and Parks and Recreation Element would result in *significant, unavoidable impacts*.

LUP Impact 5 (Class I)
The project would result in the net loss of California Rare Plant Rank 4 and Watch List plant species, native oak woodland, and sensitive habitats; therefore, the project would be potentially inconsistent with goals and policies of the County of San Luis Obispo General Plan Conservation Open Space Element pertaining to preservation of biological resources and Policy 3.8 of the Parks and Recreation Element.

LUP Impact 5 (Class I)
Mitigation Measures
<i>Implement Mitigation Measures BIO/mm-2.1 through BIO/mm-2.3, BIO/mm-4.1, BIO/mm-15.1, BIO/mm-16.1, BIO/mm-18.1 through BIO/mm-18.4, and BIO/mm-19.1.</i>
Residual Impacts
<i>Even with implementation of Mitigation Measures BIO/mm-2.1 through BIO/mm-2.3, BIO/mm-4.1, BIO/mm-15.1, BIO/mm-16.1, BIO/mm-18.1 through BIO/mm-18.4, and BIO/mm-19.1, residual impacts associated with inconsistency with goals and policies of the County COSE pertaining to preservation of biological resources and Policy 3.8 of the County Parks and Recreation Element would be significant and unavoidable (Class I).</i>

LUP Impact 6: The project could be inconsistent with Policy 2.2, Goal 2/Objective B, and Policies 6.4, 6.9, and 6.10 of the County of San Luis Obispo General Plan Parks and Recreation Element and three Public Facilities, Services, and Resources policies in the South County Inland Area Plan. Impacts would be less than significant (Class III).

Policy 2.2 of the County Parks and Recreation Element states that the County shall prioritize parkland donations that would meet identified park or recreation needs identified in the Parks and Recreation Element, serve a good mix of users, provide an appreciable amount of parkland or recreation, serve an important existing or future need, and adequately accommodate long-term maintenance. The County Parks and Recreation Department (County Parks) has provided comments that state that the proposed park would not meet an identified need due to its size, lack of park facilities, and proximate location to the existing Nipomo Community Park. However, the park would serve a good mix of users from within the Dana Reserve and would provide an appreciable amount of parkland adjacent to a compatible use, such as the childcare facility proposed in the park concept plan or surrounding affordable or workforce housing.

County Parks’ comments also stated that the park would not serve an important existing or future need and that the proposed park site is too small and encumbered with drainage features that should not count toward acres used for park land. The applicant has requested a Quimby Fee credit for conveyance of the park land to the County. However, County Parks’ comments stated that a waiver of Quimby fees would mean the long-term maintenance of the park would not be adequately accommodated. Regardless of whether the Quimby fees are paid, if the project is approved, it is proposed that the 10-acre park is proposed to be donated to County Parks and maintenance of the park and its facilities would be the County’s responsibility.

Three policies identified in the South County Inland Area Plan under Public Facilities, Services, and Resources state adequate means of generating revenues that can provide necessary public resources, services, and facilities shall be secured to better serve the existing population as well as future growth and projects that include general plan amendments and shall provide their fair share of funding for these types of public facilities. The project would result in an increased demand on fire protection services, police protection services, existing school district facilities, and library services, which would be offset through payment of Public Facilities Fees and fees paid directly to the Lucia Mar School District. Additionally, the need for fire protection services, which would be offset through mitigation requiring the provision of land for future development of a new fire station. However, as discussed above, the applicant is requesting to waive the payment of Quimby Fees based on the dedication of a public park, which may be inconsistent with these policies.

While the project would be potentially inconsistent with policies set forth in the Parks and Recreation Element and South County Inland Area Plan pertaining to donation of parkland criteria, including insufficient size, lack of meeting an identified need for park or recreation facilities, and adequate funding for long-term maintenance, inconsistency with these policies would not result in any potentially significant direct or indirect impacts to the environment. Therefore, potential impacts would be *less than significant*.

LUP Impact 6 (Class III)
The project could be inconsistent with Policy 2.2, Goal 2/Objective B, and Policies 6.4, 6.9, and 6.10 of the County of San Luis Obispo General Plan Parks and Recreation Element and three Public Facilities, Services, and Resources policies in the South County Inland Area Plan.
Mitigation Measures
<i>Mitigation is not necessary.</i>
Residual Impacts
<i>Potential impacts associated with inconsistency with policies and objectives in the County Parks and Recreation Element and South County Inland Area Plan would be less than significant (Class III).</i>

LUP Impact 7: The project could be inconsistent with policies within the County of San Luis Obispo General Plan Conservation and Open Space Element, Framework for Planning (Inland), Land Use Ordinance, and South County Inland Area Plan related to preservation of rural visual character, compatibility with the natural landscape, and preservation of views of oak woodlands and other visually significant features. Impacts would be significant and unavoidable (Class I).

The County COSE includes one goal and two policies that pertain directly to preservation of the natural and historic character and identity of rural areas. The County Framework for Planning (Inland) Policy 1 and South County Inland Area Plan Guidelines, Primary Goals, and Supporting Goals similarly include policies that emphasize the importance of preserving and enhancing a well-defined rural character. While the project would preserve the existing scenic oak ridge on-site and proposed open space areas would encompass approximately 49.8 acres of the Specific Plan Area, the project would inherently change the visual character of the site and surroundings through the introduction of commercial, institutional, and residential development; the removal of over 4,000 mature oak trees; and substantial landform alteration. Mitigation Measure AES/mm-3.1, included in Section 4.1, *Aesthetics*, has been identified to require implementation of a Visual Screening Zone along the length of project site adjacent to the required utility easement and US 101, for the purpose of reducing visibility of the development and minimizing visual impacts to the vegetated visual character of the site and its surroundings as seen from the highway. The proposed landscaping would, by necessity, be more urban in appearance and would likely take several decades to provide meaningful restoration of the vegetative character and quality of the site. Mitigation has also been identified to require preservation and replacement of oak trees and preparation of a Visual Impact Assessment for each subsequent implementing development.

The County LUO includes Highway Corridor Design Standards and Building Siting Standards aimed towards minimizing visual impacts along major transportation corridors and encouraging development that is subordinate to the natural landscape. Although the existing visual context as seen from most surrounding public viewpoints is a product of both built and natural elements, the Specific Plan Area itself is clearly rural, and is a major contributor to the visual quality and character of the community. The Temettate Ridge and foothills east of US 101 also support the natural and rural visual quality and

character of the area. As seen from US 101, the proposed commercial development along the highway would partially block views to the western portion of the project. Proposed landscaping along US 101 would somewhat reduce the urban character of the development. However, because of the project’s extensive grading and loss of mature native oak trees, the existing visual value of the site and its inherent substantial contribution to the rural and open space character valued by the community and reflected in County visual policy would be lost.

Mitigation measures have been identified in Section 4.1, *Aesthetics*, to reduce the project’s impacts associated with degradation of rural visual quality and character and views from US 101. However, the project would still have the potential to be inconsistent and/or conflict with policies identified in the County COSE, Framework for Planning (Inland), LUO, and the South County Area Plan. With incorporation of these measures, the project’s inconsistency with these goals, policies, and guidelines would be *less than significant with mitigation*.

LUP Impact 7 (Class II)
The project could be inconsistent with policies within the County Conservation and Open Space Element, Framework for Planning (Inland), Land Use Ordinance, and South County Inland Area Plan related to preservation of rural visual character, compatibility with the natural landscape, and preservation of views of oak woodlands and other visually significant features.
Mitigation Measures
<i>Implement Mitigation Measures AES/mm-3.1, AES/mm-3.2, and AES/mm-7.1.</i>
Residual Impacts
<i>Even with implementation of Mitigation Measures AES/mm-3.1, AES/mm-3.2, and AES/mm-7.1, residual impacts associated with inconsistency with goals and policies of the County COSE, Framework for Planning (Inland), LUO, and South County Area Plan related to preservation of rural visual character, compatibility with the natural landscape, and preservation of views of oak woodlands and other visually significant features would be less than significant (Class II).</i>

LUP Impact 8: The project could be inconsistent with policies in the Sustainable Communities Strategy and County Framework for Planning (Inland) associated with establishment of development and utility services within of existing transit corridors and/or urban reserve line/village reserve line boundaries. Impacts would be less than significant with mitigation (Class II).

The SCS prepared by SLOCOG includes Infill Development and Location Efficiency Policy 8, which states that mixed-use and infill development near existing transit services and activity centers shall be supported. Similarly, Principal 1, Policy 2 and Implementation Strategy 4 of the County’s Framework for Planning (Inland) states that extension of urban services shall be directed within existing urban and village areas. The DRSP proposes a mix of residential, commercial, and open space uses outside of the existing Nipomo URL. Based on its location outside of the existing Nipomo URL and low density of surrounding development, implementation of the DRSP would not consider infill development. However, the Specific Plan Area is located adjacent to the Nipomo URL in an area planned for growth, including expansion of transit service, and is generally surrounded by existing residential development.

Consistent with the *US 101 Transportation Concept Report*, 2019 RTP, and South County Circulation Study, the Specific Plan Area would include a Park and Ride lot and transit stops and facilitate the extension of transit service into the site along with maintenance of the existing bus stop located along North Thompson Avenue.

The project would result in an increased demand on fire protection services, police protection services, existing school district facilities, and library services. The demand on police protection services, existing school district facilities, and library services would be offset through payment of Public Facilities Fees and fees paid directly to the LMUSD. Additionally, the need for fire protection services, which would be offset through implementation of Mitigation Measure PS/mm-1.1, which requires the provision of land for future development of a new fire station.

While the project would result in establishment of mixed-use development and new utility infrastructure outside of the Nipomo URL, potential impacts would be minimized through provision of transit service facilities on-site and maintenance of existing transit facilities, payment of Public Facility Fees and fees paid directly to the LMUSD, and mitigation requiring provision of land for a new fire station. Therefore, impacts associated with inconsistency with policies in the County Framework for Planning (Inland) associated with establishment of development and utility services outside of URL/village reserve line (VRL) boundaries would be *less than significant with mitigation*.

LUP Impact 8 (Class II)
The project could be inconsistent with policies in the Sustainable Communities Strategy and County Framework for Planning (Inland) associated with establishment of development and utility services within of existing transit corridors and/or urban reserve line/village reserve line boundaries.
Mitigation Measures
Implement Mitigation Measure PS/mm-1.1.
Residual Impacts
Potential impacts associated with consistency with policies in the County Framework for Planning associated with establishment of development and utility services outside of existing URL/VRL boundaries would be <i>less than significant with mitigation (Class II)</i> .

Off-Site Improvements

LUP Impact 9: Off-site improvements would not conflict with applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. Impacts would be less than significant (Class III).

Based on the evaluation of the project’s potential consistency with relevant plans and policies in Section 4.11.2.4, *Consistency with Plans and Policies*, the proposed off-site transportation, water, and wastewater improvements would be potentially consistent with all applicable plans and policies adopted for the purpose of avoiding or mitigating an environmental effect, and impacts would be *less than significant*.

LUP Impact 9 (Class III)
Off-site improvements would not conflict with applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect.
Mitigation Measures
Mitigation is not necessary.
Residual Impacts
Potential impacts associated with consistency with applicable land use plans, policies, or regulations would be <i>less than significant (Class III)</i> .

4.11.6 Cumulative Impacts

LUP Impact 10: The project would result in cumulative impacts associated with inconsistency with goals and policies identified within the County of San Luis Obispo General Plan Conservation and Open Space Element, Framework for Planning (Inland), Land Use Ordinance, and South County Area Plan regarding preservation and no net loss of sensitive biological resources and preservation of rural visual character. Impacts would be significant and unavoidable (Class I).

As discussed above, implementation of the project would generally be consistent with the majority of applicable land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect. The project would have potential to be inconsistent with multiple applicable land use policies, as described and evaluated above. Of these policies, potential inconsistency with Land Use Planning Policy L-3, goals and policies of the County COSE pertaining to preservation of biological resources and Policy 3.8 of the Parks and Recreation Element, and policies within the County COSE, Framework for Planning (Inland), LUO, and South County Inland Area Plan related to preservation of rural visual character, compatibility with the natural landscape, and preservation of views of oak woodlands and other visually significant features would result in significant and unavoidable impacts.

Impacts associated with inconsistency with Land Use Planning Policy L-3 would be cumulative in nature, in that the project would contribute to an existing imbalance between jobs and housing created by historical development trends within the project area. Therefore, inconsistency with Land Use Planning Policy L-3 would result in a potentially significant cumulative impact. No feasible mitigation measures have been identified to address this potentially significant impact.

The project’s potential inconsistency with goals and policies identified within the County COSE, Framework for Planning (Inland), LUO, and South County Area Plan regarding preservation and no net loss of sensitive biological resources and preservation of rural visual character, compatibility with the natural landscape, and preservation of views of oak woodlands and other visually significant features would also result in a significant and unavoidable impact. Loss of sensitive habitats and plant species associated with the project would contribute to countywide habitat and species loss.

Degradation of rural views and character and loss of natural landscapes and oak woodland habitat associated with the project would result in a considerable contribution to the loss of rural visual character in the South County/Nipomo area. Therefore, cumulative impacts associated with inconsistency with Land Use Planning Policy L-3 and goals and policies identified within the County COSE, Framework for Planning (Inland), LUO, and South County Area Plan regarding preservation and no net loss of sensitive biological resources and preservation of rural visual character would be *significant and unavoidable*.

LUP Impact 10 (Class I)
The project would result in cumulative impacts associated with inconsistency with Land Use Planning Policy L-3 and goals and policies identified within the County of San Luis Obispo General Plan Conservation and Open Space Element, Framework for Planning (Inland), Land Use Ordinance, and South County Area Plan regarding preservation and no net loss of sensitive biological resources and preservation of rural visual character, compatibility with the natural landscape, and preservation of views of oak woodlands and other visually significant features.
Mitigation Measures
Implement Mitigation Measures AES/mm-3.1 and AES/mm-3.2, AES/mm-7.1, BIO/mm-2.1 through BIO/mm-2.3, BIO/mm-4.1, BIO/mm-15.1, BIO/mm-16.1, BIO/mm-18.1 through BIO/mm-18.4, and BIO/mm-19.1.

LUP Impact 10 (Class I)
<i>Residual Impacts</i>
<i>Residual cumulative impacts associated with inconsistency with goals and policies of the County COSE pertaining to preservation of biological resources would be significant and unavoidable (Class I).</i>

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