

4.8 LAND USE AND POLICY CONSISTENCY

There would be relatively few potential land use conflicts arising from the updated land use pattern, which is intended to minimize impacts to sensitive natural resources, or to facilitate a more logical and flexible development pattern within the community. The conflicts that are identified may or may not actually occur, because they may be adequately addressed through individual project design. Development in these areas could result in potential land use compatibility conflicts with neighboring land uses, depending on the design of projects that might occur in such areas. Potential impacts are considered Significant but Mitigable (Class II).

Standards included in the CZLUO and Local Coastal Plan are intended to address a variety of land use conflicts and provide for orderly development. However, many of the Combining Designations in the proposed LOCP do not have corresponding standards to provide an adequate framework for their implementation. Standards for these combining designations must be added and included in Chapter 7 of the proposed LOCP. In some cases, the existing Combining Designations in the Estero Area Plan as they apply to Los Osos are not included or described in the LOCP. These potential inconsistencies must be resolved in both documents. Until this occurs, policy-related impacts are potentially Significant but Mitigable (Class II).

4.8.1 Setting

a. Physical Setting. The unincorporated community of Los Osos is located along the coast in the central portion of San Luis Obispo County, generally south of and adjacent to Morro Bay and its associated estuary. Los Osos is approximately 4 miles south of the City of Morro Bay, across the bay/estuary, and approximately 10 miles west of the City of San Luis Obispo, at the western end of Los Osos Valley, a broad, relatively flat agricultural area formed by Los Osos Creek.

Los Osos is primarily residential in nature, and there are few head-of-household employment opportunities within the community. There are two primary commercial areas, the downtown area or Central Business District centered around Los Osos Valley Road and the Baywood Commercial Area centered along Second Street. These areas are focused either on local community-servicing businesses and office space, or on supporting the regional tourist economy. The downtown area is more locally focused, with grocery stores, restaurants, banks, and offices, while the Baywood community is more tourist-oriented, with some hotels, and recreational businesses along with other businesses that serve the local neighborhoods.

Additional physical setting information related to land use may be found in both Section 2.0 (*Project Description*) and 3.0 (*Environmental Setting*) of this EIR.

b. Regulatory Setting. The draft Los Osos Community Plan is intended to build on and provide a more detailed regulatory framework for the Los Osos planning area, tiering from the adopted Estero Area Plan, most recently updated in 2009. The Estero Area Plan is part of the County's General Plan and its Local Coastal Plan. All elements of a general plan must be consistent. Data, assumptions and projections ideally should be the same in each element of the plan. At the same time it is recognized that documents are generally static once adopted, even if conditions that they describe are continually changing. For that reason, there may be differences in information between documents, even if they are consistent from a policy perspective.

The following plans or other related documents are relevant to the Estero Area Plan, and therefore to the draft Los Osos Community Plan. They were reviewed in the Final EIR for the Estero Area Plan Update, which was certified in December 2003, at which time they were found to be consistent with that plan, to the extent such policies were relevant to the Estero Area Plan. These documents included, but were not limited to the following:

- Land Use Element and Local Coastal Plan, Framework For Planning
- Circulation Element
- Open Space Plan
- Safety Element
- Clean Air Plan
- Parks and Recreation Master Plan
- Noise Element
- Solid Waste Management Plan

Once adopted, the Estero Area Plan was determined to be consistent with its guiding regulatory framework, including various federal and state regulations, including but not limited to the following:

- California Coastal Act of 1976
- Regional Water Quality Control Board, Central Coast Basin Plan
- California Department of Fish and Wildlife policies
- U.S. Department of Fish and Wildlife Service policies
- Clean Water Act

The 2003 Estero Area Plan was ultimately adopted in 2009. At that time, it was found to still be consistent with the policy framework described above.

As noted in the introduction of the Estero Area Plan:

“This area plan is consistent with the intent and policies of the California Coastal Act and the San Luis Obispo County Local Coastal Program (LCP). All other county plans, policies and programs that involve the Estero Planning Area and are subject to the LCP are to be consistent with and implement this plan. In addition, where applicable, all public and private development in this planning area is to be consistent with this plan.”

The Los Osos Community Plan must be consistent with the same policy framework as for the Estero Area Plan, since it is a more detailed regulatory document for Los Osos, which is a portion of the Estero planning area. It follows that if the Los Osos Community Plan can be found to be consistent with the Estero Area Plan, it will be by definition consistent with the other regulations described above. Many of these regulations are discussed in more detail within other sections of this EIR, and used in part as the basis for determining whether or not there would be any potential impacts with respect to those issues that are evaluated. Thus, the draft LOCP’s consistency with the overall regulatory framework for various resources is included elsewhere in this EIR.

For the reasons described above, this section of the EIR will focus on the draft LOCP’s consistency with land use related policies included in the Estero Area Plan. It will also focus only on relevant policy provisions of the Estero Area Plan limited to those that relate to Los Osos, including any maps and diagrams that relate to those policies. For those most part, these are found in Chapter 7 of the Estero Area Plan, which are the Planning Area Standards, but are found elsewhere throughout the document as well.

The key aspects of the draft LOCP that will be evaluated in this section of the EIR include, but are not limited to:

- Chapter 2 – Community Plan Policies
- Chapter 7 – Planning Area Standards

To the extent necessary, other aspects of the LOCP will be evaluated as well, but in general, these portions of the plan are either background or setting information, or a recitation of relevant existing coastal policies that provide the basis for required coastal access. The relevant provisions of the draft LOCP Circulation Element (Chapter 5) are discussed in Section 4.13 of the EIR, *Transportation*.

Also note that the proposed Los Osos Community Plan is a regulatory document that is intended to expand upon the policy framework described above. Because this is not an existing document, but the subject of the EIR analysis, it is not included in the existing Regulatory Setting. However, its policies are analyzed in the Impact Analysis section relative to their consistency with the Estero Area Plan.

4.8.2 Impact Analysis

a. Methodology and Significance Thresholds.

Methodology. The analysis is based on a programmatic evaluation of the potential for future development under the LOCP to result in land use conflicts, or to conflict with the existing policy framework of the Estero Area Plan found to be consistent with applicable regulatory documents, including Coastal Act polices.

Significance Thresholds. Consistent with Appendix G of the State CEQA Guidelines and the County's adopted thresholds, impacts would be significant if development under the Community Plan would:

- *Be potentially inconsistent with land use, policy/regulation (e.g. general plan [County Land Use Element and Ordinance], local coastal plan, specific plan, Clean Air Plan) adopted to avoid or mitigate for environmental effects;*
- *Be potentially inconsistent with any habitat or community conservation plan (Although there is a Habitat Conservation Plan (HCP) being prepared to address certain species found in the Los Osos area, it is not yet completed and thus not an adopted document. It is therefore not evaluated in this section of the EIR, because it is an not existing policy or plan. However, the intent of the HCP is discussed in Section 4.3 of this EIR, Biological Resources;*
- *Be potentially inconsistent with adopted agency environmental plans or policies with jurisdiction over the project;*
- *Be potentially incompatible with surrounding land uses; and/or*
- *Physically divide an established community.*

b. Impacts and Mitigation Measures. The following analysis examines the potential land use impacts of the proposed LOCP at a programmatic level of detail.

Threshold: *Would actions under the Community Plan result in development that is potentially inconsistent with surrounding land uses?*

Threshold: *Would actions under the Community Plan result in development that physically divide an established community?*

Impact LU-1 The proposed land use pattern under the LOCP would not divide any established communities. It would also generally avoid potential land use conflicts, except in a few specific cases. Impacts in these areas are potentially significant but mitigable (Class II).

The land use pattern envisioned under the LOCP is generally similar to that already included in the adopted Estero Area Plan, with certain parcels throughout the community redesignated for other uses. In general, these changes are intended either to minimize potential impacts to environmentally sensitive areas, or to facilitate a more logical pattern of development more consistent with the intent of the Estero Area Plan and Coastal Act policies. In no case would these changes divide any established neighborhood, but would instead build on an existing pattern of development.

There are no expansion areas planned outside the URL, although as noted above, there will be minor adjustments to the existing URL, largely for administrative purposes so that certain parcels better coincide with existing property lines and ownership. Although no expansion is anticipated, there are areas within the URL where special planning area standards will apply, which are intended to guide and facilitate future growth in these areas. In general, these areas include the following:

- Central Business District
- Baywood Commercial Area
- West Side of 7th Street, between El Moro and Santa Maria Avenue
- Sweet Springs Area
- Broderon Site
- Midtown Site (Los Osos Valley Road at Palisades Avenue)
- Golf Course north of Howard Avenue
- Santa Ysabel Avenue Coastal Access
- Creekside Area (Rural Residential)
- West of Pecho Road Area
- Northwest corner of Mountain View Drive and Santa Ynez Avenue
- Morro Shores Area
- Bayview Heights
- Cuesta-by-the-Sea; Martin Tract
- Baywood Park Area
- Cabrillo Estates
- Highlands Neighborhood
- Los Osos Creek/Eto Lake Corridor
- Southwestern Hillsides

Within these areas, most existing land use designations will remain the same as they currently are. In some cases, minor land use designation changes are contemplated. In general, however, future growth will be a function of developing on currently vacant parcels.

In general, the LOCP envisions substantial decreases in land designated for residential and non-residential development, and corresponding increases in land designated for Open Space. Key changes from the Estero Area Plan are summarized below, and discussed in more detail in the Section 2.0, *Project Description*:

- **Substantial Decrease in Overall Residential Area.** There would be a net decrease in residential land use categories of nearly 419 acres, or about 15% less land area than is currently devoted to these categories. (This also accounts for the addition of the 65-acre Morro Shores Mixed Use category, which is currently residential, but would be re-designated to allow additional non-residential uses.) This would result a commensurate decrease in residential development potential compared to the existing land use designations, a concept that is explored in greater detail in the Alternatives section of this EIR.
- **Decrease in Overall Non-Residential Area.** There would be a 21-acre (or 14%) net decrease in non-residential (commercial and office) land use categories, although the proposed Morro Shore Mixed Use would provide some non-residential development potential to offset some of this decrease. Overall, this would result a commensurate decrease in non-residential development potential compared to the existing land use designations, a concept that is explored in greater detail in the Alternatives section of this EIR.
- **Substantial Increase in Open Space.** The proposed LOCP would include a 418-acre increase in Open Space within the plan area, which is over twice the amount currently designated for that purpose. Most of this change comes from decrease in both residential and non-residential area, and is shown on parcels throughout the community.
- **MSMU Category Provides Mixed Use Potential.** The Morro Shores Mixed Use category converts previously-designed RMF and RSF land into a 63-acre site that can take advantage of potential designs that incorporate a range of residential development, while also allowing a commercial service component. The intent is to allow flexibility in design to achieve a mixed-use community that addresses a variety of regional and County land use, air quality, and transportation goals.

Table 2-2 in the *Project Description* also reflects a proposed land use distribution based on the concept that the LOCP would modify the existing Los Osos Urban Reserve Line (URL) in two places to provide more logical boundaries, resulting in a net decrease of 46 acres within the URL. This includes removing a portion of the URL along the western side of the community abutting Montana de Oro State Park, which is now State-owned and part of the State Park. The other modification would be to add a small

area to the URL in the northeastern part of the community (which is also State-owned) in order to have the URL follow an existing property boundary.

Figure 4.8-1 shows the proposed land use pattern in the planning area, and potential changes from what is included in the Estero Area Plan.

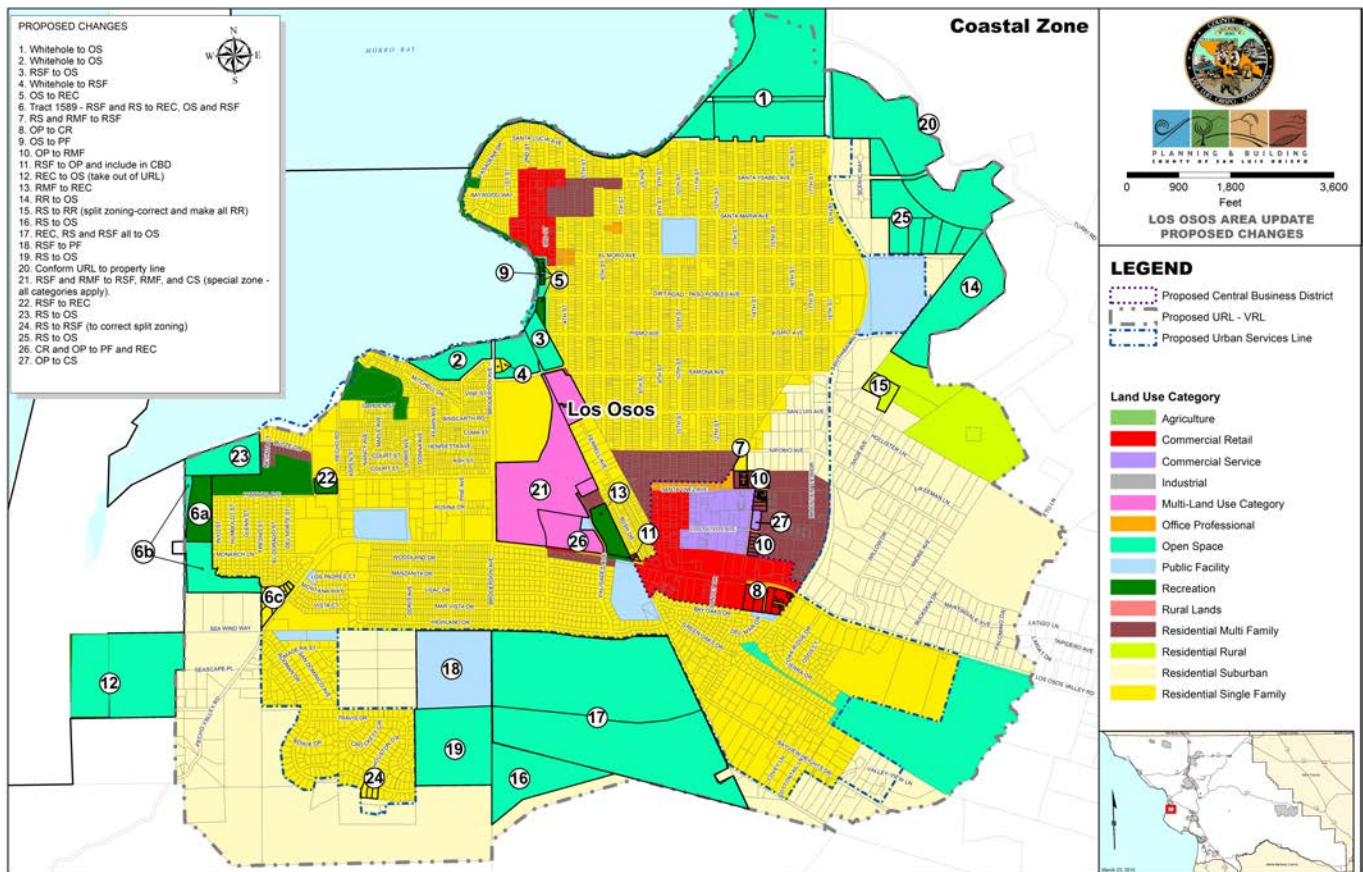


Figure 4.8-1. Proposed Land Use Changes by Parcel

Table 4.8-1 analyzes potential conflicts that may arise from proposed land use redesignations under the LOCP. In the table, potential conflicts are identified in **red**.

Table 4.8-1. Evaluation of Potential Conflicts from Land Use Designation Changes

Area Shown in Figure 4.8-1	Description of Area	APN	Existing Designation	Proposed Designation	Evaluation of Potential Conflicts
1	Elfin Forest	038-701-004, 008, 012, and 016	Uncertified ¹	OS	Designation to OS does not change the existing function of the Elfin Forest, and continues existing open space uses. No conflicts with existing residential to the south would occur.
2	Sweet Springs	074-229-010 074-101-004	Uncertified	OS	Designation to OS does not change the existing function of Sweet Springs, and continues existing open space uses. No conflicts with existing residential to the south would occur.
3	Sweet Springs East	074-229-009	RSF	OS	Designation to OS maintains land in current open space, and provides buffer between existing residential uses and Sweet Springs. No conflicts would occur.
4	Sweet Springs (Morro Palisades Co.)	074-229-014 074-229-015	Uncertified	REC	Designation to REC maintains land in current open space, and would be potentially consistent with adjacent Sweet Springs. However, the Land Use Map for draft LOCP identifies area to be designated for RSF, which is inconsistent with data provided by County. RSF is potentially in conflict with surrounding OS uses because of sensitive location near Sweet Springs.
5	West of 3rd between Pismo and El Moro Aves.	038-262-001, 007, and 004; 038-341-001	OS	REC	Parcels are currently undeveloped open space, but potentially appropriate as REC uses consistent with Coastal policies related to coastal access. Passive recreational uses are appropriate.
6	Tract 1589 (Monarch Grove)	074-026-002; 074-026-003; 074-029-001 thru 015	RS (4.0 ac) RSF (22.65 ac)	OS (16.31 ac) REC (10.34 ac)	Parcels that are currently undeveloped open space are appropriate as OS. Existing golf course is appropriately REC. The proposed redesignation would recognize existing open space and golf course development.
7	Nipomo/13th (Kesner GPA)	074-273-001 and 038-642-001	RS (1.26 ac) RMF (0.06 ac)	RSF	Proposed RSF designation allows density consistent with adjacent residential land uses.
8	S/side LOVR from w/o Chaparral to near South Bay Blvd.	074-304-004; 005; and 007; 074-314-015 thru 020	OP	CR	Proposed CR designation allows commercial retail development consistent with nearby uses on Los Osos Valley Road.
9	LOCSD well site west of 3rd St., s/o El Moro Ave.	038-262-008	OS	PF	Proposed PF designation recognizes existing well site. No land use conflicts would occur.
10	East side Fairchild Way; north side Santa Ynez Ave. west of 12th	074-226-030 thru 039; 074-294-014, 020, 021, 011, 013, 012; 074-223-017, 025; 074-227-001 thru 012 and 015	OP	RMF	Proposed RMF designation recognizes existing multi-family residential development, and is consistent with adjacent similar development to the east. Provides appropriate transition to nearby non-residential uses. No land use conflicts would occur.
11	Northwest corner Los Osos	074-243-013 thru 015	RSF	OP	Proposed OP designation more appropriate adjacent to LOVR than existing RSF designation. Also recognizes existing development consistent

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Area Shown in Figure 4.8-1	Description of Area	APN	Existing Designation	Proposed Designation	Evaluation of Potential Conflicts
	Valley Rd/Bush Dr.				with proposed OP designation.
12	West of Western Fringe of West of Pecho area and Hotel site (State-owned)	074-011-010 and 074-011-012	REC	OS (Rural Estero)	Proposed OS designation appropriately recognizes existing open space uses. No conflicts would occur.
13	East side Palisades Ave. adjacent to community park (county)	074-229-027	RMF	REC	Proposed REC designation appropriately recognizes expansion of community park, and is consistent with existing park uses on site. No conflicts would occur.
14	Powell Property Adjacent to Los Osos Creek (State owned)	067-012-011	RR	OS	Proposed OS designation appropriately recognizes existing open space uses. Change from RR designation removes potential conflict and impact in sensitive resource area.
15	Southerly Ptn. Parcel B, COAL 01-0203 (Powell)	067-012-017	RS	RR	Proposed RR corrects an existing split parcel zoning and appropriately rezones to a lower density residential designation.
16	Ptn. former Tr. 1976 (Southeastern Hillside)	067-131-006	RS	OS	Proposed OS designation appropriately recognizes existing open space uses. Change from RS designation removes potential conflict and impact in sensitive resource area. No conflicts would occur.
17	Eastern Hillside, Morro Palisades	073-023-004, and 005	REC (32.0 ac) RS (79.0 ac) RSF (109.5 ac)	OS	Proposed OS designation appropriately recognizes existing open space uses. Change from existing designation removes potential conflict and impact in sensitive resource area. No conflicts would occur.
18	Upper Broderson	074-022-074	RS	PF	Proposed PF designation may be appropriate, but would be adjacent to existing residential uses. However, the site is used as a leachfield, and does not present noise or lighting conflicts with nearby residential development.
19	Lower Broderson	074-022-073	RSF	OS	Proposed OS designation appropriately recognizes existing open space uses. Change from existing designation removes potential conflict and impact in sensitive resource area. No conflicts would occur.
20	URL to conform to property boundary	038-711-011	OS (Rural Estero)	OS	No change to existing OS designation, just an administrative boundary shift. No conflicts would occur.
21	Morro Shores Mixed Use Area	074-229-024, 026	RSF (23.3 ac) RMF (38.0 ac)	Morro Shores Mixed Use	Mixed Use designation presents opportunity to create cohesive mixed use development that is compatible with adjacent uses in a way that the existing RSF and RMF designations might not. Detailed development standards in the proposed LOCP would promote framework for future

Table 4.8-1. Evaluation of Potential Conflicts from Land Use Designation Changes					
Area Shown in Figure 4.8-1	Description of Area	APN	Existing Designation	Proposed Designation	Evaluation of Potential Conflicts
					development in the area that ensures internal compatibility and with nearby uses.
22	Ptn. Tract 1646 west of Pecho Road, s/o Skyline	074-026-010	RSF	REC	Proposed REC designation is an appropriate extension of existing recreational (golf course) uses to the north and west, and potentially compatible with residential development to the east and south.
23	Terminus Butte Dr.	074-011-014	RS	OS	Proposed OS designation appropriately recognizes existing open space uses. Change from RS designation removes potential impacts in sensitive resource area adjacent to bay, and removes potential impacts related to residential development from coastal hazards. No conflicts would occur.
24	Cabrillo RS to RSF correct split zoning	074-457-030, 031, and 032	RS	RSF	Proposed RSF corrects an existing split parcel zoning and appropriately rezones to a more dense residential designation to better facilitate development on a 1-acre parcel.
25	Northeast properties RS to OS (State owned)	038-711-004, 041, 015, 016, 035, 036, 037, 038	RS	OS	Proposed OS designation appropriately recognizes existing open space uses. Change from existing designation removes potential conflict and impact in sensitive resource area. No conflicts would occur.
26	TRI-W / Midtown	074-229-017	CR/OP	PF/REC	Proposed PF/REC designation may be appropriate, but would be adjacent to existing residential uses. Depending on the nature of recreation-oriented public facility development, land use conflicts could occur from lighting and other issues associated with public facilities.
27	Los Olivos and Fairchild	074-293-015	OP	CS	Proposed CS designation is potentially appropriate and consistent with existing CS development to the west. However, potential conflicts could occur with existing and potential multi-family residential uses to the east, depending on the nature and design of potential commercial service development.
<p>1. "Uncertified" refers to areas where the Coastal Commission currently has retained jurisdiction, because the County and the Coastal Commission could not agree on land use designations and standards. These areas would be redesignated as shown in the table.</p>					

In summary, there would be relatively few potential land use conflicts arising from the updated land use pattern, which is intended to minimize impacts to sensitive natural resources, or to facilitate a more logical and flexible development pattern within the community. The conflicts that are identified may or may not actually occur, because they may be adequately addressed through individual project design. However, because no development has yet been proposed in such areas, thus analysis concludes that conflicts are possible unless mitigated through design. As shown on **Table 4.8-1**, the areas in which this could occur include:

- Area 26. Tri-W/Midtown
- Area 27. Los Olivos and Fairchild

Development in these areas could result in potential land use compatibility conflicts with neighboring land uses, depending on the design of projects that might occur in such areas. Potential impacts are considered **Significant but Mitigable (Class II)**.

In the case of one area, there appear to be an internal conflict between the proposed LOCP map and data underlying the assumptions for development that need to be resolved before adoption of the LOCP:

- Area 4. Sweet Springs (Morro Palisades Co.)

No significant impact is identified, but resolution of the potential administrative conflict is needed.

Mitigation Measures. The following mitigation measure is required to address potentially significant land use conflicts in the identified areas:

LU-1(a) Standards to Minimize Land Use Conflicts. The LOCP shall be modified to include design and/or planning area standards for the Tri-W/Midtown and Fairchild/Los Olivos parcels (Areas 26 and 27), in order to address and minimize potential land use conflicts with neighboring uses. Standards should address the specific types of allowed uses, and address design considerations such as setbacks, building heights, lighting, landscaping, and architecture. These standards shall be implemented in project design, when development applications in these areas are considered.

The following restrictions on future land uses in these areas would ensure compatibility with neighboring uses:

- Tri-W/Midtown (Area 26). Consistent with LOCP Mixed Use Policy 3.4.2, the County’s intent is to allow for additional park and community facilities in this area, compatible with the adjacent library and park. Expanding this policy to address appropriate design standards that relate to lighting and noise would ensure compatibility with nearby residential uses. New policy language shall be added as follows: *“Future park and community facilities at this location must include appropriately-scaled lighting that does not adversely affect nearby residents. The site shall be primarily for daytime use.”*

- Los Olivos and Fairchild (Area 27). The CS designation as included in the LOCP is relatively open-ended, noting only that “the size, scale, and design of such facilities must be consistent with the existing small-town character of Los Osos and compatible with adjacent residential and retail development.” While this standard would apply to this area, it may not be sufficiently restrictive to ensure compatibility with nearby residences. This standard shall be expanded to address issues related to noise, lighting, air quality and traffic, and shall read as follows: “...the size, scale, and design of such facilities must be consistent with the existing small-town character of Los Osos and compatible with adjacent residential and retail development. Land use compatibility shall be based on Planning Commission review of a commercial project’s impacts to nearby residences related to noise, lighting, air quality, and traffic, based on technical studies associated with such projects, as determined to be appropriate by the Department and Planning and Building.”

Plan Requirements and Timing. The Planning and Building Department shall add the recommended policy to the LOCP prior to Plan adoption.

Monitoring. Planning and Building shall ensure that the above language is included in the LOCP prior to adopting the plan.

Residual Impacts. With proposed mitigation, impacts would be less than significant.

Threshold: *Would actions under the Community Plan be potentially inconsistent with land use, policy/regulation (e.g. general plan [County Land Use Element and Ordinance], local coastal plan, specific plan, Clean Air Plan) adopted to avoid or mitigate for environmental effects?*

Threshold: *Would actions under the Community Plan be potentially inconsistent with adopted agency environmental plans or policies with jurisdiction over the project?*

Impact LU-2 The proposed policy framework under the LOCP is generally consistent with the policy framework and intent of the Estero Area Plan, and therefore with all other regulatory documents from which the Estero Area Plan is derived. However, certain policies in the Estero Area Plan do not have a corresponding implementation framework in the LOCP. This is considered a significant but mitigable (Class II) impact.

The Los Osos Community Plan (LOCP) functions as a General Plan and Local Coastal Plan guiding future development within the Los Osos community. The LOCP is part of the Estero Area Plan and located within the Estero Planning Area. The LOCP establishes a vision for the future of Los Osos and defines the nature of future development in the Los Osos planning area, and provides development standards that in many cases are site-specific. The LOCP is facilitated to a large extent by the recently completed sewer project. The sewer project has been a prerequisite to growth in Los Osos, and the effects of that project were examined in a separate certified EIR. At the same time, the County is preparing a communitywide Habitat Conservation Plan (HCP), the permitting requirements of which will potentially affect the nature of future of development in Los Osos. That project is undergoing separate CEQA review, and the applicable prescribed mitigation measures in that effort will be incorporated into the final LOCP as appropriate.

The key components of the draft LOCP include:

- *Updating data and information from the approved Estero Area Plan with respect to the Los Osos urban area;*
- *Incorporating strategic growth policies;*
- *Incorporating conditions of approval from the Coastal Development Permit for the Los Osos Wastewater Project, including*
 - ✓ *Development of a sustainable buildout target supported by the safe yield of the groundwater basin; and*
 - ✓ *Integration of conservation strategies from the HCP currently under preparation*
- *Considering Coastal Commission issues identified during the 2004 and 2009 Estero Area Plan update; and*
- *Developing a Public Facilities Financing Plan for new development.*

The primary objective of the Los Osos Community Plan is to establish a framework for the orderly growth and development of Los Osos. Additionally, the plan is intended to be consistent with strategic growth principles and other land use policies established in the County General Plan.

This overall objective is further articulated in Chapter 2 of the draft Community Plan through a series of Community Goals, which are intended to implement the community's vision. These are stated below, following the Community Vision from which they are derived:

Los Osos Community Vision. *All land use policies and plans should be based on sustainable development that meets the needs of current population and visitors without endangering the ability of future population to meet its needs or drawing upon the water of others to sustain community livelihood.*

1. Environment

- a. *Protect and enhance the Morro Bay Estuary so that it is a clean, healthy, functioning ecosystem that harbors a diversity of wildlife.*
- b. *Promote conservation of natural environment through preservation of the existing flora, fauna, and sensitive habitats.*
- c. *Protect, maintain, enhance, and expand the existing greenbelt.*

2. Economy. *Improve and diversify the local economy by providing more opportunity for local businesses and head of household jobs.*

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

4. Population Growth. *Establish a maximum rate of growth within the Los Osos Urban Reserve Line, consistent with available resources, services and infrastructure.*

5. Distribution of Land Uses, Location and Timing of Urban Development. *Focus on infill and mixed use development consistent with the County's Strategic Growth Policies and Framework for Planning.*

6. Residential, Commercial and Industrial Land Uses

- a. *Maintain a small-town atmosphere.*
- b. *Provide zoning that enables businesses to expand and remain in the community, and establish incentives to encourage good design of commercial development.*

7. Visitor-Serving, Recreation and Industrial Land Uses

- a. *Encourage improvement of tourist-oriented facilities, with an emphasis on eco-tourism.*
- b. *Develop additional neighborhood and community parks and recreation facilities for existing and future populations.*
- c. *Provide maximum public access, and protect existing public access, to the coast, the shoreline, the bay, and public recreation areas, consistent with the need to protect natural and agricultural resources and private property rights.*

8. Public Services and Facilities

- a. *Base all land use policies and plans on sustainable development that meets the needs of current population and visitors without endangering the ability of future population to meet its needs.*
- b. *Carefully manage water resources to provide a clean, sustainable resource for the community.*
- c. *Provide needed local services, such as urgent care facilities, senior care facilities, etc.*

9. Circulation

- a. *Establish an efficient circulation system and pattern of land uses that minimize the number of automobile trips.*
- b. *Encourage alternatives to single-occupant and automobile travel, such as pedestrian and bicycle travel, transit, carpooling, and telecommuting.*
- c. *Complete and pave the community’s grid system where feasible.*

10. Implementation and Administration. *Promote a high level of community participation and voice in land use planning decisions.*

Policy Consistency Analysis

Table 4.8-2 provides an analysis of the LOCP’s proposed policy framework in the context of the existing Estero Area Plan. As described in the table, the LOCP builds on, and is consistent with, the policy framework included in the Estero Area Plan.

Table 4.8-2. LOCP Policy Consistency Analysis with Estero Area Plan			
Proposed LOCP Policy		Proposed LOCP Implementation	Estero Area Plan Consistency Analysis
EC-1	Encourage economic development that will make Los Osos more economically self-sufficient.	Program EC-1.1: Identify target businesses. Program EC-1.2: Conduct targeted marketing. Program EC-1.3: Promote tourist-oriented development.	Fulfills intent of Chapter 2 of the Estero Area Plan, Economy and Population. Consistent with Goals 1-6 for the Entire Planning Area (pages 2-4 and 2-5 of the Estero Area Plan) encouraging economic development.
EC-2	Provide flexible zoning that enables businesses to expand and remain in the community.	Land use plan	Fulfills intent of Chapter 2 of the Estero Area Plan, Economy and Population. Consistent with Goals 1-6 for the Entire Planning Area (pages 2-4 and 2-5 of the Estero Area Plan) encouraging economic development.
EC-3	Improve commercial areas by making them more attractive and pedestrian-friendly.	Program EC-3.1: Business Improvement District.	Consistent with Los Osos Land Use policies encouraging high quality urban design to create an attractive environment (pages 4-17 to 4-25) and related Los Osos Urban Area Standards

Table 4.8-2. LOCP Policy Consistency Analysis with Estero Area Plan

Table 4.8-2. LOCP Policy Consistency Analysis with Estero Area Plan		
Proposed LOCP Policy	Proposed LOCP Implementation	Estero Area Plan Consistency Analysis
		(pages 7-76 to 7-106).
PS-1	Monitor water demand through the Resource Management System to ensure that new development can be supported by available water supplies.	Program PS-1.1: Water-Allocations for new development. Estero Area Plan, Chapter 7, Standard III.J
PS-2	Implement the provisions of an adopted Basin Plan for the Los Osos Groundwater Basin.	Program PS-2.1: Water – Groundwater management.
PS-3	Continue to work cooperatively with local government agencies to coordinate location of new facilities and shared use of existing facilities.	Implemented as a policy.
LU-1	Maintain a hard urban edge around Los Osos, surrounded by a well-managed greenbelt.	Land use plan Program LU-1.1 Los Osos Greenbelt
LU-2	Concentrate or cluster development to protect contiguous environmentally sensitive areas.	Land use plan Planning Area Standards: Section 7.3 – Subsection E
LU-3	Maintain a small-town atmosphere, while increasing opportunities for business and employment.	Land use plan Planning Area Standards: Section 7.3 – Subsections B.2, E, L.3, N, and P. Program LU-3.1: Gateways. Program LU-3.2: CBD design and enhancement.
LU-4	Promote pedestrian travel and activities so that commercial areas become pedestrian- rather than automobile-oriented.	Land use plan Circulation plan Planning Area Standards: Section 7.5 – Subsection A.3
LU-5	Plan for a flexible combination of residential, service, office, and lodging uses at the Morro Shores	Planning Area Standards: Section 7.5 – Subsection J

Table 4.8-2. LOCP Policy Consistency Analysis with Estero Area Plan

Proposed LOCP Policy		Proposed LOCP Implementation	Estero Area Plan Consistency Analysis
	Mixed Use Area.		
LU-6	Maintain and enhance the unique character of the Baywood Commercial Area.	Program LU-6.1: Baywood Commercial Area design and enhancement. Planning Area Standards: Section 7.5 – Subsection A.5	See consistency discussion for Policy LU-2.
LU-7	Provide opportunities for a variety of housing types that are affordable to people of different income levels.	Planning Area Standards: Section 7.3 – Subsection O Section 7.5 – Subsections I.1.b and J.4.c	See consistency discussion for Policy LU-2.
LU-8	Maintain a suburban character in Residential Single Family neighborhoods that will not be served by the wastewater project.	Planning Area Standards: Section 7.5 – Subsections L.3 and L.11	See consistency discussion for Policy LU-2.
LU-9	Provide adequate parkland, open space, and recreation areas to accommodate Los Osos’ anticipated population in 2035.	Land use plan Program LU-9.1: New parks and recreation facilities. Program LU-9.2: Multiple use of drainage basins. Program LU-9.3: Joint use of school facilities. Program LU-9.4: Recreation program.	See consistency discussion for Policy LU-2. Also consistent with Recreation policies related to Los Osos (Section V.B. of the Estero Area Plan).
CIR-1	Maximize public access to and along the coast.	Circulation plan Program CIR-1.1: Accept and retain coastal access offers Program CIR-1.2: Abandonments and quiet title action. Program CIR-1.3: Protect existing access points. Program CIR-1.4: Develop access improvements.	Consistent with Estero Area Plan Vision and General Goal A.1: <i>“Provide maximum public access, and protect existing public access, to the coast, the shoreline, the bay, and public recreation areas, consistent with the need to protect natural and agricultural resources and private property rights.”</i>
CIR-2	Provide safe, convenient access to multiple transportation modes from shopping centers, schools, residential areas, and recreation facilities.	Circulation plan Program CIR-2.1: Transit system. Program CIR-2.2: Transportation Demand Management.	Consistent with Countywide Circulation Goals 1-10 that relate to providing a multi-modal transportation system that is consistent w the level of growth and development anticipated under the plan (Circulation Element Section II.)
CIR-3	Responsibly finance and administer the community circulation system.	Implemented as a policy.	Consistent with related economic and transportation goals and policies included in the Estero Area Plan.
CIR-4	Design the circulation system to be compatible with the community’s character and responsive to local environmental needs.	Circulation plan Program CIR-4.1: Narrow streets. Program CIR-4.2: Trees. Program CIR-4.3: Commercial streetscape. Program CIR-4.4: Traffic calming.	Consistent with Countywide Circulation Goals 1-10 that relate to providing a multi-modal transportation system that is consistent w the level of growth and development anticipated under the plan (Circulation Element Section II.) Also consistent with the overall intent of the

Table 4.8-2. LOCP Policy Consistency Analysis with Estero Area Plan		
Proposed LOCP Policy	Proposed LOCP Implementation	Estero Area Plan Consistency Analysis
		Estero Area Plan to provide for orderly and managed growth in an economically and environmentally sustainable manner, concepts that are woven throughout its policy framework.
EN-1	Effectively manage endangered and threatened biological resources in and around Los Osos. Program EN-1.1: Habitat Conservation Plan. Program EN-1.2: Recovery Plan. Program EN-1.3: Habitat monitoring. Program EN-1.4: Protection and management of sensitive habitats. Program EN-1.5: Support conservation organizations. Program EN-1.6: Morro Bay shoreline wetlands mapping.	Consistent with the overall intent of policies and programs included in Chapter 6 of the Estero Area Plan, notably those related to the Sensitive Resource Area Combining Designation, particularly with regard to the Morro Bay Estuary and Shoreline, as well as those related to Los Osos and Vicinity (Chapter 6, Section III.E.1 though 11; and VI.A. and B.)
EN-2	Manage urban runoff to reduce discharge of pollutants into Morro Bay. Program EN-2.1: Los Osos runoff control. Program EN-2.2: Los Osos urban watershed management.	Consistent with the overall intent of policies and programs included in Chapter 6 of the Estero Area Plan, notably those related to water quality, particularly with regard to the Morro Bay Estuary and its watershed (Chapter 6, Section IV, V and VI.C, D and E.)

Combining Designations: A Key Implementation Tool

An important implementation mechanism in both the proposed LOCP and the Estero Area Plan is the concept of the “Combining Designation”. These are land use overlay designations intended to provide protection for various environmental resources, or in some cases, to protect people and structures for various hazards. It is a fundamental method under the County’s General Plan for implementing the policy framework included in that document, and all community plans that derive from that document, including the proposed LOCP. Therefore, it is important that the LOCP provide a consistent presentation of the Combining Designations, both internally, and with regard to how they are presented in the Estero Area Plan, which functions as the County’s General Plan for the region in which Los Osos is located.

Table 4.8-3 provides this analysis.

Table 4.8-3. LOCP Combining Designations – Consistency Analysis with Estero Area Plan		
Proposed LOCP Combining Designations	LOCP Description of Combining Designations	Consistency Analysis – Internally and with the Estero Area Plan
Coastal Zone (LCP)	The coastal zone encompasses the entire Los Osos community. The LCP combining designation identifies	LCP Combining Designation covers entire planning area. Recognizes that the LOCP must be consistent with Coastal Act policies, and this is an appropriate

Table 4.8-3. LOCP Combining Designations – Consistency Analysis with Estero Area Plan		
Proposed LOCP Combining Designations	LOCP Description of Combining Designations	Consistency Analysis – Internally and with the Estero Area Plan
	specific programs to ensure that access to the shoreline is provided in accordance with the policy of the Local Coastal Plan.	mechanism to include all Coastal Act requirements by reference. The Estero Area Plan is consistent with Coastal Act, and as LOCP is potentially consistent with Estero Area Plan, it is also consistent with Coastal Act.
Geologic Study Area (GSA)	Includes two “sub” Combining Designations: <ul style="list-style-type: none"> • Los Osos Liquefaction GSA • Ground Rupture GSA 	There is no discussion of the GSA Combining Designation the LOCP Planning Area Standards. GSA Standards are described in the Estero Area Plan, but not for the Los Osos Urban Area. These either should be included in the LOCP, and the Estero Area Plan modified to include a description of the GSA in the Los Osos Urban Area, or appropriate CZLUO standards should be referenced in the LOCP document.
Flood Hazard (FH)	Addresses flood issues along Morro Creek	There is no discussion of the FH Combining Designation in the LOCP Planning Area Standards. FH Standards are described in the Estero Area Plan, but not for the Los Osos Urban Area, and not for Los Osos Creek. These either should be included in the LOCP, and the Estero Area Plan modified to include a description of the FH Combining Designation in the Los Osos Urban Area, or appropriate CZLUO standards should be referenced in the LOCP document.
Historic Site (H)	Addresses the Los Osos schoolhouse	There is no discussion of the H Combining Designation in the LOCP Planning Area Standards. It is described in the Estero Area Plan, including the Los Osos Schoolhouse, but no standards for the schoolhouse are included in that document, nor in the LOCP. These either should be included in the LOCP, and should be included in the Estero Area Plan, or appropriate CZLUO standards should be referenced in the LOCP document.
Archaeologically Sensitive Area (AS)	Identifies areas of the community known for the potential to contain cultural resources. Applicants of development proposals in these areas are required to obtain a records check and a surface search prior to approval. Standards to protect resources are described in the LCP Policy Document and in Section 23.07.104 of the Coastal Zone Land Use Ordinance.	There is no discussion of the AS Combining Designation in the LOCP Planning Area Standards. In the Estero Area Plan, standards are subsumed into SRA standards (per Section VI.G), but not actually described further in that document. These either should be included in the LOCP, and the Estero Area Plan modified to include a description of the AS Combining Designation in the Los Osos Urban Area, or appropriate CZLUO standards should be referenced in the LOCP document.
Sensitive Resource Area (SRA)	Includes and describes several “sub” Combining Designations: <ul style="list-style-type: none"> • Morro Bay Estuary SRA <ul style="list-style-type: none"> ○ Morro Bay Sandspit SRA ○ Los Osos Estuary SRA 	Section 7.4.A.of the LOCP describes standards for “Morro Bay Shoreline SRA”, but there is no equivalent SRA described in Chapter 2 of the LOCP. There is also no discussion of, or standards for, the “sub” SRA s described in Chapter 7 of the LOCP. The two sections must use

Table 4.8-3. LOCP Combining Designations – Consistency Analysis with Estero Area Plan		
Proposed LOCP Combining Designations	LOCP Description of Combining Designations	Consistency Analysis – Internally and with the Estero Area Plan
	<ul style="list-style-type: none"> ○ Elfin Forest SRA ○ Baywood Peninsula SRA • Los Osos Monarch Butterfly SRA • Eto and Warden Lakes SRA • Los Osos Ecosystem SRA 	<p>equivalent terms, and standards must be tailored for the identified Combining Designations.</p> <ul style="list-style-type: none"> • Los Osos Monarch Butterfly SRA. There is no discussion of this SRA in the LOCP Planning Area Standards. Standards must be created for this SRA. • Eto and Warden Lakes SRA. There is no discussion of this SRA in the LOCP Planning Area Standards, except for standards included in the Residential Suburban designation that relate to Eto Lake. Standards must be created for this SRA. • Los Osos Ecosystem SRA. Section 7.4.B. includes appropriate standards for this SRA. <p>The Estero Area Plan describes the SRA for the Los Osos Urban Area, and identifies the following “sub” SRAs:</p> <ul style="list-style-type: none"> • Sweet Springs and Cuesta-by-the-Sea SRA • Morro Bay SRA • Morro Bay Kangaroo Rat SRA <p>The LOCP and Estero Area Plan should describe and include standards for the same SRA components. The LOCP should describe the existing SRAs included in the Estero Area Plan, and the Estero Area Plan should be modified to include those in the LOCP. If appropriate, applicable references to standards in the CZLUO should be included.</p>

As described in **Table 4.8-3**, many of the Combining Designations in the proposed LOCP do not have corresponding standards to provide an adequate framework for their implementation. Standards for these combining designations either should be added and included in Chapter 7 of the proposed LOCP, or the LOCP should include appropriate references to applicable standards in the CZLUO. In some cases, the existing Combining Designations in the Estero Area Plan as they apply to Los Osos are not included or described in the LOCP. These potential inconsistencies must be resolved in both documents, based on direction provided in **Table 4.8-3**. Until this occurs, policy-related impacts are potentially **Significant but Mitigable (Class II)**.

Mitigation Measures. The following mitigation measure is required to address potentially significant policy inconsistencies between the proposed LOCP and Estero Area Plan:

LU-2(a) Combining Designation Consistency. The LOCP shall be modified either to include additional standards for identified Combining Designations for which no standards

have been included in the plan, or references to existing applicable standards in the CZLUO shall be included where appropriate, as shown on Table 4.8-3 of the EIR. In addition, some existing Combining Designations in the Estero Area Plan as they apply to Los Osos are not included or described in the proposed LOCP. These potential inconsistencies must be resolved in both documents, based on direction provided in Table 4.8-3.

Plan Requirements and Timing. The Planning and Building Department shall add the recommended language to the LOCP prior to Plan adoption.

Monitoring. Planning and Building shall ensure that the above language is included in the LOCP prior to adopting the plan.

Residual Impacts. With proposed mitigation, impacts would be less than significant.

c. Cumulative Impacts. The project-specific analysis evaluated potential communitywide impacts under the LOCP. For land use and policy issues, project-specific impacts are considered the same as cumulative impacts. As described above, this includes significant but mitigable impacts related to land use and policy consistency. With prescribed policy-level mitigation to be included in the proposed LOCP, cumulative impacts would be considered **Class III, less than significant**. As future applications for individual projects are submitted at a project level of detail, the precise evaluation of future project-related impacts would be coordinated through individual project-level environmental review as appropriate.

d. Subsequent Environmental Review for Future Development Projects in the Community Plan Area. Pursuant to CEQA Guidelines Section 15183, additional CEQA review is not required for projects that are consistent with the development density established by existing zoning, community plan or general plan policies for which an EIR was certified, except as might be necessary to examine whether there are project-specific effects which are peculiar to the project or its site. **Table 4.8-4** describes conditions under which future development in the study area would require additional CEQA review, pursuant to Section 15183.

Table 4.8-4. Conditions Under Which Future Development in the Community Plan Area Would Require Additional CEQA Review	
Condition	Impact to Address
<i>The future project is inconsistent with underlying General Plan and zoning designations.</i>	LU-1 and LU-2
<i>The future project is inconsistent with Community Plan policies or design guidelines.</i>	LU-1 and LU-2

Table 4.8-4. Conditions Under Which Future Development in the Community Plan Area Would Require Additional CEQA Review	
Condition	Impact to Address
<i>The future project would result in an impact peculiar to the project or parcel in any issue area. An effect is not considered peculiar if uniformly applied development policies or standards previously adopted by the County would substantially mitigate the environmental effect.</i>	Impact that is peculiar to the project or parcel
<i>The future project would result in an impact or impacts not analyzed above, including off-site or cumulative effects.</i>	Impact other than LU-1 and LU-2
<i>The future project would result in an impact or impacts analyzed above, but at a higher level of severity as a result of substantial new information not known at the time the EIR was certified.</i>	Worsened LU-1 and LU-2, as applicable