

From: Dr. Stephanie Pincetl
To: San Luis Obispo County Board of Supervisors
July 14, 2023

Dear Supervisors

I am writing as a former Los Angeles County Planning Commissioner, Professor at the Institute of the Environment and Sustainability at UCLA, and well published author on California land use, energy transitions, water, and California policy on these topics.

I am writing about the proposed land development before you in Nipomo, the Dana Reserve, (*Dana Reserve Specific Plan (PLN- 1118, SUB2020-00047, LRP2020-00007, ED21-094)*). It proposes to transform an approximate 274 acres of oak woodlands into a prosaic development, replete with high-end single family dwellings, affordable housing built by a non-profit, and a shopping/industrial site. The proposal is yet another example of 20th century approaches to land use that will generate absolute vehicle miles traveled, destroy oak habitat that is not substitutable or mitigatable (habitat is unique to place, its not a generic concept, interchangeable anywhere), perpetuate segregation and exposure of lower income populations to higher sources of emissions, will generate serious run off, and more. Let me illustrate my concern with this development with few more examples to illustrate not only its environmental impact, but probable impacts on the budget of San Luis County operations.

The project developer offers to provide a site for a fire station. This is a far cry from building a fire station, buying the equipment and funding new staff. Those costs will be assumed by the county, an indirect subsidy for the developer, and the developer does not contribute to fire fighting expenses.

The development will increase a burden on the sewage treatment plant. The developer does not mitigate the ongoing extra costs for this additional burden.

Greenhouse gas emissions for the roads are not mitigated in anyway – asphalt roads are made of oil. Further, the developer proposes no mechanism to maintain the roads over time. We know they will need to be repaired and resurfaced. This cost is externalized onto the county rate payers.

Policing needs will increase. Who will pay for that?

The water required by the development is predicated on the State Water Project being reliable. We know that that is no longer the case. This not a net zero water development in which the developer installs water conservation measures in the community to account for the new water that will be required. No, it relies on the expectation that water will be reliably available into the future, a fallacious expectation. The County should require the development to be zero net water.

The commercial is isolated from the residential, and the bikability/walkability is risible. This is a design that will result in people driving to shopping, even those shopping opportunities on the property.

Affordable housing is located near the freeway, perpetuating the exposure of low income communities to the highest pollution burdens, and its construction is off loaded to a non-profit who has to cobble together the funding to build it. Truly not a way to show the developer's commitment to the community he claims to love. Further, it will likely end up being another community that will appear on Cal Enviro Screen metrics, burdened by higher exposures to air pollution. Instead the development should mix all income levels in the housing part of the development, at a minimum.

Segregating commercial means that there will necessarily be driving, as mentioned above. The parking requirements will create an urban heat island around the commercial. Increased urban heat means increased electricity load for cooling, and the heat will radiate into the surrounding residential. It will deter walking.

A large parking lot creates a great deal of stormwater runoff. What are the plans for the expansion of stormwater runoff and has the developer offered any mechanism for its mitigation and or remediation?

Neighborhood commercial should be allowed by right in and among the housing (e.g. lawyers, hair dressers, mom and pop grocery store, etc. . .) all walkable. No parking required.

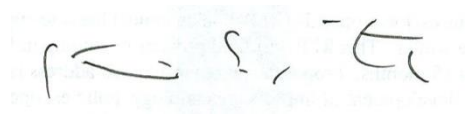
The 'offsetting' of the destruction of habitat does not mean that **a.** equivalent habitat will be created, **b.** that there will not be absolute overall loss. It is not possible to create virgin land, thus other land will need to be used, reducing overall land devoted to regional habitat.

As the developer is not the builder, there is no assurance that the land uses proposed will be those the builder follows through with, further, there is no evidence that this development will incorporate the highest and most sustainable building and other practices. What are the expectations of the developer relative to the performance of the dwelling units, commercial and industrial buildings? No where is there mention of passive heating and cooling (e.g. solar orientation, deep shade built into the residences for summer cooling), techniques that will reduce the urban heat island (such as cool roofs, cool paving surfaces), minimization of new water, true walkability. No, this development shows little initiative and desire to be responsible to the environment and the public, even less to Nipomo.

In driving around the Nipomo urban area, it is obvious there is a lot of disturbed vacant land that is just sitting there, already adjacent to development. If San Luis Obispo County really cares about its residents and future, these are the places that need to be infilled, first. They are located where walkability will be more likely, and where existing infrastructure already exists. It makes good economic sense to use what has already been put in the ground, even to expand its capacity if necessary, over building new in undisturbed high value habitat lands. This idea that there is infinite space, and there are infinite resources is a bit antiquated. Further, that approach off loads much additional expense over time onto the county rate and tax payers.

The responsible act is to deny the project as proposed and suggest to the land owner that the county and he, will explore development possibilities on lands that are already served by infrastructure, and have been disturbed. These are lands where intelligent, thoughtful and community serving development should occur, including mixed income housing, neighborhood serving commercial and parks.

Thank you for your attention, and my respectful regards

A handwritten signature in black ink, appearing to read "Stephanie Pincetl". The signature is written in a cursive style with some loops and a horizontal line at the end.

Stephanie Pincetl