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Protecting and preserving San Luis Obispo County's natural environment since 1971

To Whom It May Concern,

As a representative of the Environmental Center of San Luis Obispo (ECOSLO), I am writing in regards to the Draft Environmental Impact Report (DPEIR) SCH#2021060558 for the Dana Reserve Specific Plan. ECOSLO is greatly concerned about the potential significant and unavoidable impacts of this Project. The proposed 1,289 residential units and 110,000-203,000 sq. ft. of commercial development on a 288-acres on the Nipomo Mesa would bring with it numerous significant and unavoidable impacts while pushing forward with what we consider to be environmentally irresponsible development practices.

Chief among the impacts listed in the DEIR are the significant and unavoidable impacts to special-status plant and wildlife species. The proposed removal of 3,943 oak trees within the Project area would impact 21.7 acres of coast live oak forest and 75.3 acres of coast live oak woodland (97 acres total). Even with the proposed mitigation the DEIR still notes that the removal is, *"a significant net loss of oak trees and acreage of oak woodlands in the county."* The same can be said of the project's impacts to the Burton Mesa Chaparral. The Burton Mesa Chaparral is one of the rarest natural communities throughout San Luis Obispo county, and one that is rapidly disappearing on the Nipomo Mesa. As with the proposed removal of oak trees, the DEIR notes that even with the mitigation put forward, *"the limited availability of off-site mitigation parcels and the limited on-site opportunities to restore and maintain the ecological integrity of this ecosystem, potential impacts would be significant and unavoidable."* But these are not the only impacts ECOSLO is concerned about. The DEIR also lists significant and unavoidable impacts to Air Quality, Greenhouse Gas (GHG) Emissions, Land Use, Population and Housing, Transportation, and Growth-Inducement.

While ECOSLO understands the importance of increased housing supply, we firmly believe that this Project does not meet the principles of what we consider to be responsible development. The proposal is not focused on limiting urban sprawl, respecting historic and cultural resources, and reducing our impact on the natural world. Of the alternatives put forward in the DEIR, ECOSLO supports moving forward with the Environmentally Superior Alternative of Alternative 3, the Residential Rural Cluster Subdivision alternative. While it may not meet the County's housing supply goals, it would reduce impacts related to Biological Resources, GHG Emissions, Land Use and Planning, Population and Housing, and Public Services.

Residents of San Luis Obispo County should not have to choose between increasing suburban sprawl and affordable housing, and we are disappointed that this Project asks that we do so once again. We hope that the County takes these concerns into account and thank you for your time and attention to this matter.

Regards,

Grant Helete, Community Organizer
ECOSLO - Environmental Center of San Luis Obispo

Dana Reserve Draft Environmental Impact Report

Section 4-17, Transportation

Regarding TR/mm-3.1:

Even though I chair the Nipomo Traffic and Circulation Committee I am not sending this as a Nipomo T&CC member

EIR Statement

TR Impact 3 (Class I) Buildout of the Specific Plan Area would exceed the County VMT thresholds and therefore would not be consistent with State CEQA Guidelines Section 15064.3(b). VMT per employee would be incrementally reduced compared to existing conditions; however, the project-related increase in residential VMT per capita and overall VMT would exceed the County VMT thresholds. Mitigation Measures TR/mm-3.1 A transportation demand management program or identification of transportation demand management strategies to implement would be required of each applicant. The residential, commercial, education, and/or hotel development applicant in consultation with the County of San Luis Obispo will choose feasible transportation demand management strategies and tailor to the development proposal. Potential measures to reduce vehicle miles traveled include, but are not limited to:

My Response to mitigating proposals

1. Improve or increase access to transit - Not possible

RTA has admitted an unwillingness to add more transit stops in Nipomo as there is insufficient population density to warrant more stops. I have applied several times through the Unmet Needs Program always receiving a denial response . Developer plans on providing transit stops in the project and a Park-and-Ride. These will be to no avail and does not mitigate the VMT

2. Increase access to common goods and services – Does not appear to be feasible

Common goods and services consist of numerous and various retail establishments, professional services, schools and including various medical specialties, vehicle service facilities, post offices and many other services. The developer's proposed commercial area appears to be rather limited. Will the developer be required to provide all of the common goods and services? Where will they be sited?

3. Incorporate affordable housing into the project – This does not mitigate VMT it increases it

This implies smaller lot sizes hence, more houses per acre resulting in more vehicles adding to the VMT

4. Orient the project towards transit, bicycle, and pedestrian facilities – Repetitive

Impossibility of transit already mentioned in 1. Pedestrian facilities implies easy access to good and services which probably not available per 2.

5. Improve bicycle and/or pedestrian facilities and/or transit services – **Repetitive**

This is already addressed in 4.

6. Limit or eliminate parking supply – **This does not mitigate VMT it increases it**

A two or three car family will remain a two or three car family regardless of parking availability. They will simply drive farther to park thus increasing VMT. In many cases rental units are shared by more than one family (as are some single family units) This may result more than two or three cars per unit.

7. Implement or provide access to commute reduction programs- **How can this be done**

Will the developer fund car-, bike-, and ride-sharing programs for the design life of the project.

8. Provide car-, bike-, and ride-sharing programs – **Repetitive**

Same as 7.

9. Provide transit passes – **What transit?**

As per 1 and will the developer continue to provide passes for the design life of the project.

10. Provide on-site amenities at places of work. **How?**

Developer has no control over places of work. Will he be funding the amenities? if the workplace is required to provide these amenities then this is not a project provided mitigation.