



Department of Planning and Building
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By Email

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Dana Reserve

*Dana Reserve Specific Plan Environmental Impact Report
Chapter 2 Project Description*



Figure 2-8. DRSP Proposed Conceptual Master Development Plan.

The DEIR fails on many grounds including but not limited to:

Context

Science

Fairness

Perspective

Logic

In the end and like most EIRs, it is a compartmentalized, systematic exploitation of the obvious designed to discourage future progress.

Some of these failures are detailed below. However before considering the detail, please read the section immediately below, which provides essential overall context which the DEIR completely ignores.

Table 4-1. Summary of Environmental Impacts Analysis

Environmental Resource	Significant, Unavoidable Adverse Impacts	Significant, but Mitigable Impacts	Less than Significant Impacts
Aesthetics		X	
Agriculture and Forestry Resources		X	
Air Quality	X		
Biological Resources	X		
Cultural Resources		X	
Energy		X	
Geology and Soils		X	
Greenhouse Gas Emissions	X		
Hazards and Hazardous Materials		X	
Hydrology and Water Quality		X	
Land Use and Planning	X		
Mineral Resources			X
Noise		X	
Population and Housing	X		
Public Services		X	
Recreation		X	
Transportation	X		
Tribal Cultural Resources		X	
Utilities and Service Systems		X	
Visual Resources		X	

The Draft Dana Reserve Environmental Impact Report (DEIR) finds CEQA Class I unmitigatable impacts for 6 of the Environmental Resource criteria. These include Air Quality, Biological Resources, Greenhouse Gas Emissions, Population and Housing, and Transportation.

The combined findings would forbid decision makers from approving the project, except that CEQA provides that project alternatives can be considered if the project cannot be moved to a different location. In this case the developer does not own an alternative site where the project could be located.

More blatantly, it ignores the fact that there is no site in the unincorporated county owned by a private person on which the 288 acre project could be located. The County's Housing Element inventory of existing sites demonstrates this fact conclusively. See pages in section 7 - (8) - 7-(20) of the Housing element for the detail. The data for the categories is summarized below.

Very Low and Low

Assessor's Parcel Number	Community	General Plan Designation and Zone	Acres	Maximum Allowable Density (units/ac)	Maximum Potential Units Per General Plan	Realistic Potential Units (18 units/ac)	Affordability Category	Water Capacity (Y/N?)	Sewer Capacity (Y/N?)	Electrical Service Available (Y/N?)	Internet Service Available (Y/N?)
017-322-016	Shandon	CR	2.31	38	88	41	Lower	Yes	Yes	Yes	Yes
TOTALS			81.96		3,114	1,459					

Moderate

Totals			57.8		2,003	975					
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Note that only a total of 139.8 acres are zoned for low and moderate in the entire unincorporated area. The Dana reserve at 288 acres exceeds this amount.

Above Moderate

Totals			194.39		1,205	821					
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Only 194.4 acres are zoned for above moderate (everything else). Even when above moderate is added in, there are only 333.8 acres zoned in the entire unincorporated County for homes.

The County's scheme of land use provides no substantial opportunity to develop large numbers of homes with economies of scale on any basis. The fact that it has a State approved Housing Element is simply window dressing and a result of the narrow and incomplete State criteria for achieving approved housing elements.

Basically, the County's scheme of land use is destined to preserve and promote large lot and estate type development of homes in excess of \$1 million or more in price for high income/high net worth whites seeking a rural or semi-rural lifestyle. It is patently discriminatory and is particularly abusive of Hispanic families, black families, agricultural workers who are largely

Hispanic, aging persons on fixed incomes, single mothers, homeless people, and young people seeking to form a family household.

Moreover, it seeks to concentrate low and moderate income people in dense development within the corporate cities and unincorporated URLs. Here, the County is again concentrating low and moderate income people (many of whom are Hispanic, Black, Native American) into dense zones. All this is camouflaged under the rubric of fighting global warming and promoting “efficient” development.

In turn, and because where you live has everything to do with your chances in life, the lower income people are condemned to the worst schools, highest tax and fee jurisdictions, crime, cannabis dispensaries, traffic noise (scary sirens and public transit buses roaring down the streets), homeless encampments, and all the rest.

Please see the article Addendum I to this EIR response at the end for further information.

The California Environmental Quality Act (CEQA)

In the case of the Dana Reserve Project and many other projects, CEQA is abused by local planners, decision makers, and intervenors to aid and abet the social and racial concentration of the poor into dense urban areas with older and often deteriorated housing. In turn, this insulates the upper middle and upper income whites from the negative urban living problems of crime, drug and alcohol abuse, noise, traffic, and social unrest.

The permitting data reveals the terrible truth: Notwithstanding all the rhetoric, hardly any dwelling units are being permitted in the unincorporated area at all. Remember, the table below summarizes the number of units permitted, not the number actually constructed. The largest numbers are in the South County area and mainly consist of units permitted decades ago in the Nipomo golf communities. Most of the units are the result of the developers implementing a deferred phase of construction, not truly new permits.

Were it not for these the County would have permitted less than 100 during the first 3 quarters of 2021 – 22.

New Dwelling Units¹ by Planning Area/Sub Area, 2005-2021

Planning Area/Sub Area	05-06	06-07	07-08	08-09	09-10	10-11	11-12	12-13	13-14	14-15	15-16	16-17	17-18	18-19	19-20	20-21 ²
Adelaida	24	12	21	11	3	5	3	2	5	5	4	8	5	8	6	4
Carrizo ³	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	0
El Pomar-Estrella	90	53	33	14	9	11	10	20	38	16	28	19	22	26	15	12
Estero	19	15	13	6	10	8	3	6	13	8	7	18	6	10	7	7
Las Pilitas	0	6	5	2	5	1	3	1	2	1	0	1	1	1	0	2
Los Padres (North)	2	0	0	0	1	2	1	0	0	0	0	0	0	0	0	0
Nacimiento	43	32	18	11	7	9	10	33	50	21	20	25	27	18	14	9
North Coast	14	7	9	1	5	0	3	7	2	3	2	0	0	2	1	1
Salinas River	99	41	33	36	25	16	15	21	45	60	65	207	74	86	65	37
San Luis Bay Coastal	52	22	70	7	15	13	17	34	41	25	30	39	41	9	11	1
San Luis Obispo	11	9	11	2	4	4	5	6	9	2	4	10	5	8	12	10
Shandon-Carrizo (North)	28	28	11	5	2	4	6	2	4	0	4	4	3	6	5	12
South County ⁴	71	34	77	19	17	40	35	114	157	116	113	161	131	118	102	116
South County Coastal ³	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	0
Total	453	259	301	114	103	113	111	246	366	257	277	492	315	292	238	211

1. Only including units subject to the Growth Management Ordinance. For 20015-2016, based on number of construction permit applications received in fiscal year. For 2017-2021, based on number of construction permits issued in fiscal year.

2. As of April 26, 2021.

3. Carrizo and South County Coastal Planning Areas were added to this chart for FY 21-22 and were not tracked in previous years' annual allocation reports.

4. Huasna-Lopez Sub Area was removed from this chart for FY 21-22 because it is included in the South County Planning Area.

In these regards, as outlined above, the entire EIR and process are terribly flawed and designed to kill the project. After all, it lists alternative 3 as the preferred project. Under Alternative 3, the residential land use category would be limited to approximately 78 to 390 rural residential units (plus associated ADU development) instead of the 1300 proposed in the application.

Alternative 3 would be less dense, have many fewer homes, and lack the economies of scale necessary to produce work force and low income units.

Specific Dana Reserve Class I Impacts:

Air Quality.

Actually, the project appears to meet or exceed all the clean air requirements that pertain to existing or potential problems from dunes dust, chemical, agricultural, or other sources.

Instead, the key unmitigatable source (CO₂ and other tailpipe gases) is alleged to be the fact that the project would increase the housing jobs imbalance and the new residents would have to drive their cars to area employment centers, most likely in Santa Maria and San Luis Obispo.

Inconsistent. The proposed project is located within the NCSD Sphere of Influence (SOI). Nipomo is an unincorporated area that is jobs poor. The project would result in the creation of 1,441 dwelling units (including ADUs) and approximately 273 new jobs, which would increase

anticipated to hinder regional and local 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 inconsistent with this measure.

The project is to be built in phases over many years. The State of California has set 2035 as the year when no new fossil fuel vehicles can be sold in the State. During the run up period over the next decade the number of fossil fuel cars should decline swiftly. This barrier, and its assignment as an unmitigatable Class I Impact, is therefore false as the problem is already scheduled to be solved.

The EIR cites the fact that the project would exceed VMT in reaching its conclusion. This is detailed in the Transportation section of the DEIR

Table 4.3-8. Project VMT Impact Summary

Category	VMT Per Employee	VMT Per Capita
County Threshold	25.7	27.2
Proposed Project	28.9	30.0
Percent Reduction in VMT Required to Reduce to Below Threshold	4.48%	9.34%

Source: AMBIENT (2022)

Other operational air quality impacts of the project are also listed as unmitigatable.

With implementation of Mitigation Measures AQ/mm-3.3 and TR/mm-3.1, operational annual emissions would be reduced to below SLOAPCD's significance threshold; however, daily emissions would continue to exceed SLOAPCD's significance threshold. Therefore, impacts related to the generation of criteria pollutants in exceedance of established daily emissions thresholds would be significant and unavoidable.

Table 4.3-11. Operational Emissions without Mitigation

Operational Period/Source	Emissions ¹						
	ROG	NOx	ROG+NOx	CO	PM ₁₀		
					Fugitive	Exhaust	Total
Daily Emissions (lbs/day)							
Area Source	59.5	1.4	60.9	118.8	0	0.7	0.7
Energy Use	1.0	8.5	9.5	4.2	0	0.7	0.7
Mobile	34.9	54.7	89.6	350.2	115.8	0.7	116.5
Total Project Emissions	95.4	64.6	160.0	473.3	115.8	2.0	117.8
SLOAPCD Significance Thresholds	--	--	25	550	25	1.25	--
Exceeds SLOAPCD Thresholds?	--	--	Yes	No	Yes	Yes	--
Annual Emissions (tons/year)							
Total Project Emissions	15.6	10.1	25.7	72.0	17.6	0.3	17.9
SLOAPCD Significance Thresholds	--	--	25	--	25	--	--
Exceeds SLOAPCD Thresholds?	--	--	Yes	--	No	--	--

Source: AMBIENT (2022)

Note: Based on operational year of 2030 for Hotel, Commercial, Educational, and Residential. Totals may not sum due to rounding. Refer to EIR Appendix D for modeling output files and assumptions.

¹ Daily emissions are based on the highest emissions for summer or winter operational conditions for buildout conditions. Totals may not sum due to rounding.

Biological Resources

The EIR Summary Table indicates that the Biological Resources constitute a Class I unmitigatable resource. A lengthy chapter is presented on this subject that lists scores of plant and animal species which will suffer harm if the project is built. It also contains pages of minutiae about possible mitigations. All this is quite confusing.

At the end of the chapter there is a statement of unmitigatable class I resource.

4.4.6 Cumulative Impacts BIO Impact 20: The project would have cumulatively considerable impacts related to biological resources. Cumulative impacts would be significant and unavoidable (Class I). The proposed project's contribution to cumulative impacts on biological resources is based on the loss of open space and associated wildlife habitat. The Specific Plan Area primarily consists of Burton Mesa chaparral, coast live oak woodland, and coast live oak forest, intermixed with various grassland habitats. Several special-status plant and animal species and two sensitive vegetation communities occur on-site, all of which would be impacted by the proposed development, except for 21.7 acres of primarily coast live oak forest habitat. The County anticipates several smaller residential development projects in the surrounding community and two major development projects.

Basically, it appears that any project of any significance would be too impactful. Obviously, the construction of even 50 houses and some commercial would result in cutting down trees, removing the bushes, etc.

The mitigations listed seem to be massive detailed lists of further studies, annual reporting, and impractical projects.

This section needs to be summarized and structured in way that the public and decision makers can actually assess the gravamen of the issue. In fact a portion of the chapter states:

Evidence of episodic disturbance from farming was observed in the field and from aerial imagery dating back to 1939. Field evidence of very old woodland clearcutting suggests a link to a historic drought between 1862 and 1864 when ranchers were compelled to fell trees for livestock consumption (Guinn 1890; and personal communications between Althouse and Meade with Jim Sinton, family rancher familiar with the Nipomo Mesa). Google Earth imagery indicates that the grassland west of US 101 was last farmed in about 2002, or possibly 2006 (Althouse and Meade 2022a).

*Farming, mowing, and chaparral (brush) removal appears to have been conducted for decades. Imagery from 1939 shows evidence of brush clearing on rolling topography and farmed fields on flatter terrain, and imagery from 1949 indicates some of the brush cover and associated coast live oaks (*Quercus agrifolia*) were starting to grow back. Some brush clearing is evidenced in 1957. The 1969 to 1994 aeriels show chaparral cover generally increasing in areas not actively farmed. Between 1994 and 2002, shrub reduction appears to have reduced brush cover while retaining young trees barely visible in the 1994 imagery. Aerial images from 2002 and years thereafter show reduced brush cover. Livestock pens are visible in 2011 to 2013 aerial imagery.*

Two additional parcels provide a connection from Cherokee Place on the north side of the ranch to Willow Road. The western 7-acre parcel is undeveloped and shows evidence of significant site disturbance from past dry farming. There are no trees, weedy species dominate, and a few bushes have become reestablished and/or have regenerated since 2010 when the last mowing appears to have occurred. The eastern 7-acre parcel is densely wooded with a residence and numerous animal pens for horses, chickens, and other animals.

This is not some pristine natural land untouched by humans.

Greenhouse Gas Emissions

GHG Impact 3 (Class I)
The project would conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.
Mitigation Measures
Implement Mitigation Measures AQ/mm-3.1, AQ/mm-3.3, GHG/mm-1.1, and TR/mm-3.1.
Residual Impacts
Implementation of Mitigation Measures AQ/mm-3.1, AQ/mm-3.3, GHG/mm-1.1, and TR/mm-3.1 would reduce potential impacts related to operational GHG emissions from the proposed project. However, the project would generate VMT in a manner that would be inconsistent with SLOCOG's 2019 RTP/SCS and the effectiveness of the identified mitigation to reduce this impact below applicable thresholds is not certain. Therefore, with implementation of identified mitigation, potential impacts would be significant and unavoidable (Class I).

Cumulative Impacts GHG Impact

The project would result in a cumulatively considerable impact to greenhouse gas emissions. Cumulative impacts would be significant and unavoidable (Class I). As discussed in Chapter 3, Environmental Setting, the cumulative impact analysis is based on the County's cumulative projects list. Cumulative projects would generate residential, industrial, and commercial development within the county. Project-specific impacts related to the generation of short and long-term GHG emissions would be less than significant with mitigation.

COLAB NOTE: This pretzel logic. Recognizing that the planet is a closed eco system, nothing more could ever be bold anywhere in the world which generates any significant CO_{2e}. The fact that the measure is confined to SLO is ridiculous since the alleged problem is planetary. The DEIR is simply cherry picking the arbitrary county boundary as its frame of reference.

Based on required compliance with existing diesel idling requirement, the CBC and CALGreen, and the County's solid waste reduction goals, reasonably foreseeable future projects are not anticipated to result in short- or long-term GHG emissions that would conflict with established thresholds. Nevertheless, reasonably foreseeable future projects would be subject to separate environmental review to determine potential impacts related to GHG emissions and reduce GHG emissions, as necessary. Therefore, impacts would be less than cumulatively considerable.

The project would generate VMT that would exceed the significance threshold of 25.7 VMT per employee and 27.2 VMT per capita; therefore, the proposed project would be inconsistent with the 2019 RTP/SCS and the effectiveness of identified mitigation included to reduce this impact is not certain, thus it would remain significant and unavoidable. Reasonably foreseeable future projects would likely contribute to VMT within the vicinity of the Specific Plan Area. Individual future projects would be subject to separate environmental review to determine individual

impacts related to consistency with the 2019 RTP/SCS and implement reduction measures as necessary and feasible.

Other reasonably foreseeable future projects are not anticipated to generate population growth or VMT of this scale; however, reasonably foreseeable future projects within the vicinity of the Specific Plan Area still have the potential to contribute VMT and further exceed established thresholds.

Since other reasonably foreseeable future projects are anticipated to generate substantially less population growth and VMT, implementation of long-term VMT reduction strategies would likely mitigate impacts to below established VMT thresholds. **However, due to project-specific significant impacts, cumulative impacts would be significant and unavoidable**

Table 4.8-2. SLOAPCD GHG Thresholds of Significance

Operational Year	2030
Land Use Sectors GHG Emissions Target ¹	213,000,000
Population ²	41,860,549
Employment ³	20,729,820
Service Population (SP)	62,590,369
GHG Efficiency Threshold (MTCO ₂ e/SP/year)	3.4

Source: AMBIENT (2022)

This chart is for the whole county. It is not just for the emissions attributable to the unincorporated county over which the Board of Supervisors has regulatory land use authority. It is unfair and the goal should be for the unincorporated county. Note that per the table below, from its adopted Energy Wise Plan.

Where does the 213,000,000 (million) come from?

Is this for the whole county including cities?

The unincorporated county only generated 917,000 in 2006.

It should be less now as the County has implemented a number of CO2 reducing programs and projects.

The primary sectors of GHG emissions are transportation (40%), commercial and industrial energy (24%), agriculture (off-road equipment, livestock, and crops) (18%), residential energy (15%), waste (3%), and aircraft (less than 0.1%).

Figure 3-4. Unincorporated San Luis Obispo County 2006 GHG Emissions

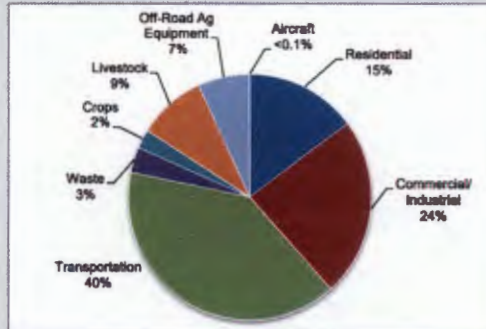


Table 3-1. Unincorporated San Luis Obispo County 2006 GHG Emissions

	2006 GHG Emissions (MTCO ₂ e)	Percentage of Total Emissions
Residential	136,360	15%
Commercial/Industrial	215,970	24%
Transportation	366,260	40%
Waste	30,540	3%
Other - Crops	22,630	2%
Other - Livestock	83,420	9%
Other - Off-Road Equipment	63,280	7%
Other - Aircraft	240	< 0.1%
Total	917,710	100%¹

1. Due to rounding, the sum of individual values may not equal the total given.

Figure ES-3. Community-Wide GHG Emissions Forecast (MTCO₂e)

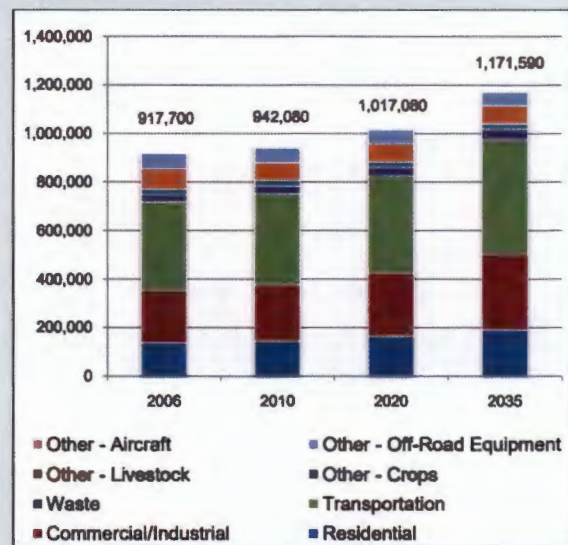


Table 4.8-5. Operational GHG Emissions Without Mitigation

Operational Year/Source	2030 GHG Emissions (MTCO _{2e} /year)
Area Source ¹	32.9
Energy Use ²	2,477.2
Motor Vehicles ³	13,836.04
Waste ⁴	368.2
Water ⁵	169.6
Total Operational Emissions	16,884.0
Amortized Construction Emissions	987.3
Total with Amortized Construction Emissions	17,871.3
Service Population (SP) ⁶	4,826
MTCO_{2e}/SP	3.7
GHG Efficiency Significance Threshold	3.4
Exceeds Threshold?	Yes

Source: AMBIENT (2022)

This section of the DEIR lacks appropriate context and data:

- What percent of SO County’s total MTCO_{2e} emissions do 17,871.3 represent? Is this significant enough to reject the project?
- What percent of California’s total MTCO_{2e} emissions do 17,871.3 represent?
- As noted above, if all new vehicles sold in 2035 and after must be electric, what is the validity of this finding?
- Given all of other new and accumulated State regulations on vehicle emissions, how valid is the 13, 836.04 number?
- Are the calculations formulae underlying the number based on current laws or were the formula basis developed 5 years ago?

Land Use and Planning

Car Pollution by the Trip to Work: This section promulgates 3 Class I unmitable imapcts . The first one , below, is based the Countypolicy that homes should be bult close to work palces. The problme is tthat the largest employers are in Santa Maria, San Luis Obispo, the Cal Poly Campus, the Atascadero State Hospital, and several scattaered large school districts. The County chased the largest Nipomo employer (Philipps 66) out of the County when it rejected a lager oil loading facilty.

As noted above , the DEIR Clean Air analysis is obslote and based on old data. Morevoer it is scientifically irrational as it arbtralaly restriects the CO_{2e} problem boundary to theamount generated in the County. Even if the County and Califronia become entireley carbon free, the United States would have to invade and subdue China, Russia, India, North Korea, Iran, and now

the European Union to compel them to reduce their exponential expansion of fossil fuel use. This would be a war which the US would lose. China would wind up administering western north America which would end any consideration of this symbookc and destructive set of policies.

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>

Rare Plants: The DEIR promulgates an unmitagatable Class I Impact due to rare plants on the site. It is a mixed chaparral / oak woodland which cover thousands of sq. miles in southern and central California. While the development would impact specific plant on the site, it would not strategically impact the overall range of the species.

Moreover the site has been anthropomorphically disturbed over the decades by grazing and agriculture. This is not a pristine evolutionary biological community.

In 2011, the County Planner who wrote the Conservation and Open Space element revealed us that it was designed to forestall as much development as possible. He was amazed that there was not more public opposition.

Once again the site is being treated as if it were the universe as opposed to an infinitesimal portion of the Oak/Chaparral environment.

Reportedly, the California Rare Plant Society has threatened to sue the County if the project is approved. Of course hundreds of acres of this environment are burned to scorched earth over the years because governments will not allow controlled burns, fire breaks, timber harvesting, agriculture, and other fire control mechanisms. Should they sue, the Planner should be subpoenaed to the depositions and testify under oath about his biased development of the ordinance.

LUP Impact 5 (Class I)
<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.</i>

Sensitive Biological Resources: and Views Here the DEIR finds a Class I unmitagatable impact due to the conversion of the view of the site to a development and the loss of biological resources .

Views: Most of the people viewing the site are driving past it on Highway 101 at 65 miles per hour while focusing on the cars ahead of them to avoid the frequent back down induced rear end crashes which occur in that section the highway. They only have a few seconds to look. Moreover, the west side section of the highway immediately to the South contains a series of commercial developments including a large Flea Market, RV Sales lot, furniture outlets, bill boards, and condominiums. The east side contains a pot puree of dilapidated trailer parks, bill boards ,dog kennels, plant nurseries and broken down vehicles.

The DEIR is totally out of context of the area and is a reducto ad absurdum . This isn't the Hearst Ranch or even the Leticia Vineyard.

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
<i>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.</i>

Population and Housing

The DEIR asserts that the project will generate too much unplanned population for the Nipomo area. In fact, the County population growth has fallen below all recent estimates. Most of it is in Paso Robles. Also the County has driven its largest Nipomo employer Phillips 66 out of the County and never lifted a finger to help PG&E maintain the Diablo Nuclear Power Plant proving 2000 jobs just a few miles up Highway 101 from Dana project site in n Avila Beach.

Nevertheless, the DEIR ignores this fact and dwells on Plan inconsistency.

PH Impact 1 (Class I)
The project would induce substantial unplanned population growth in the Nipomo area.
Mitigation Measures
No feasible mitigation has been identified.
Residual Impacts
Potential impacts associated with substantial unplanned population growth would be significant and unavoidable (Class I).

Based on the analysis above, the DRSP is anticipated to result in the future construction of 831 singlefamily dwelling units, 458 multi-family dwelling units, and 152 ADUs. According to the U.S. Census Bureau, the average household size in Nipomo between 2015 and 2019 was 3.16. In order to calculate a more conservative population estimate, the Nipomo average household size was used to calculate the project’s estimated residential population rather than rely on the countywide average household size of 2.51. Based on the average local household size in Nipomo, future buildout of DRSP residential land uses is anticipated to result in a residential population increase of approximately 4,555 (Table 4.14-13).

Specific Plan Area PH Impact 1: The project would induce substantial unplanned population growth in the Nipomo area. Impacts would be significant and unavoidable (Class I). The DRSP would allow for the future phased development of residential uses, village commercial uses, flex commercial uses (including light industrial uses), open space, trails, and a public neighborhood park within the 288-acre Specific Plan Area.

Table 4.14-14. Project Residential Population Generation

Land Use Type	Number of Dwelling Units	Nipomo Average Household Size ¹	Estimated Population Generated
Single-Family	831		2,626
Multi-Family	458	3.16	1,448
Accessory Dwelling Units	152		481
Total	1,441	--	4,555

¹ Source: U.S. Census Bureau (2019)

The finding is that unplanned population growth is inconsistent with various plans. However, other than the assertion that the housing to jobs ratio is skewed and that the vehicle miles traveled would increase, there is no data demonstrating that the phased build out the proposed development would cause any real harm in terms of public health and safety.

There are no problems with utilities (in fact the project benefits the entire area population in terms of water availability and cost), no public safety issues, no parks issues, no school issues,

ET. In fact the DEIR lists all the other measures in this category as potentially consistent with policies, plans , and ordinances.

The jobs /housing balance is a red herring because there is no way that Nipomo has sufficient land zoned for large commercial projects such as office parks. In fact the Dana reserve project actually provides development which ads 250 jobs. As we note above in the Land Use and Planning Section , the key employers are in or adjacent to the City of San Luis Obispo and in the City of Santa Maria.

Area governments, institutions , am private sector employers all not difficulty in recurring and retaining employees. One of the main reasons is lack of housing.

In this case the DEIR would have the decision makers look a gift horse in mouth in all respects in compliance with stale and obsolete policies produced by ideological anti-growth staffers over a decade ago.

Transportation

This section simply regurgitates the impossibility of adding more homes without adding any traffic . It does however list the potential of some mitigation which could help.

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	<p><i>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:</i></p> <ol style="list-style-type: none"> 1. <i>Improve or increase access to transit</i> 2. <i>Increase access to common goods and services</i> 3. <i>Incorporate affordable housing into the project</i> 4. <i>Orient the project towards transit, bicycle, and pedestrian facilities</i> 5. <i>Improve bicycle and/or pedestrian facilities and/or transit services</i> 6. <i>Limit or eliminate parking supply</i> 7. <i>Implement or provide access to commute reduction programs</i> 8. <i>Provide car-, bike-, and ride-sharing programs</i> 9. <i>Provide transit passes</i> 10. <i>Provide on-site amenities at places of work</i>

TR Impact 9 (Class I)
The project would result in a cumulatively considerable impact to transportation and traffic.
Mitigation Measures
Implement Mitigation Measure TR/mm-3.1.
Residual Impacts
<i>Cumulative impacts related to consistency with applicable plans, hazardous roadways design, and emergency access would be avoided through compliance with identified project-specific mitigation; no additional mitigation is needed to avoid or minimize potential cumulative impacts. However, implementation of Mitigation Measure TR/mm-3.1 would not reduce impacts to a less-than-significant level. Therefore, residual cumulative impacts would be significant and unavoidable (Class I).</i>

ADDENDUM I



THE DEHUMANIZING TYRANNY OF DENSIFICATION

The prevailing vision of environmentalism today caters to a global oligarchy.

BY EDWARD RING

Filing cabinet of human lives, Where people swarm like bees in tunneled hives, Each to his own cell in the covered comb, Identical and cramped—we call it home."

— Gerald Raftery, "Apartment House"

The conventional wisdom among America's liberals, often seconded and rarely challenged by conservatives, is that population growth in the United States should be channeled as much as

possible into the footprint of existing cities. Surrounding cities should be “greenbelts,” suburban growth should be rejected as unsustainable “sprawl,” and human settlement in areas defined as the “urban-wildland interface” should be discouraged and, where possible, reversed.

The movement to increase the population density of cities and reduce rural populations is already enshrined in California law and is rolling quietly across the rest of the nation. It is marketed as enlightened, environmentally sustainable urban planning, but the moral pretext obscures a self-serving density agenda that is shared by several powerful special interests.

Among all the misanthropic trends in public policy that threaten the freedom and prosperity of ordinary Americans, the density agenda is probably the least discussed.

Stated simply, population densification will fundamentally undermine Americans’ ability to preserve their freedom and independence. You don’t have to reference Agenda 2030—about which it is now almost *impossible* to find any negative commentary online—to understand how easily a population can be controlled when it is relocated and concentrated into a handful of megacities.

In the 1990s, shortly before the end of apartheid, I remember speaking with someone who had just returned from a tour of South Africa. He commented on his impressions of the densely populated black townships that were adjacent to every major city.

“They’ve got them all bottled up tight as sardines in a can,” he said, “nice and neat, so whenever they want, they can zap them all.”

Here is an aerial photo of neighborhoods in Soweto, just outside Johannesburg. It was perhaps the most infamous township of the apartheid era.

The Racist Bantustan
Soweto, South Africa
40' x 80' lots, single family dwellings



This image, which corresponds to a population density exceeding 20,000 people per square mile, reveals how blacks in Soweto were pushed into packed neighborhoods where they could easily be contained in the event of mass civil unrest.

In America, even this population density is frowned upon by enlightened environmentalists. After all, those people lived in “single-family dwellings,” which are themselves “exclusionary” and “unsustainable.” In California, and against the odds, politically connected developers can still build limited numbers of single-family dwellings because free-standing individual homes are the overwhelming choice of families, if they can afford them.

Featured below is an aerial photo of such a development in Sacramento, California’s state capital and one of the citadels of green extremism. Note the lot size. These 40-by-80-foot lots are precisely the same size as those in Soweto.

The Green Bantustan

Sacramento, California

40' x 80' lots, single family dwellings



How those neighborhoods are evaluated by mainstream commentators bespeaks a blithe hypocrisy. In Soweto, such neighborhoods were variously described as concentration camps where people were confined and subjected to inhumane crowding. In Sacramento, these neighborhoods are under attack as environmentally incorrect “sprawl,” as laws and zoning increasingly favor multifamily dwellings.

Causes and Effects

Economics, not any particular concern for the planet, drives the density agenda. Chief among these economic imperatives is to render housing barely affordable. Reducing the supply of housing while increasing the U.S. population through loose immigration policies creates shortages, which then drive-up prices.

Perpetually inflating the value of real estate, in turn, creates new asset collateral. This helps balance the U.S. trade deficit, as foreign investors repatriate dollars by buying expensive American real estate. It also enables the ongoing U.S. trade deficit, as homeowners are seduced

into borrowing against their home equity to purchase imported consumer products. The macroeconomic scheme that lets Americans print as much currency as they want and monetize

the world with dollars purchasing foreign goods is sustained, in large part, by keeping the value of U.S. real estate artificially high.

That isn't the only reason to cram people into the footprint of existing cities and jack up the cost of all housing through engineered shortages. The interests of public-sector unions and public utilities are another powerful driver obscured by density policies.

Public-sector unions always benefit when public infrastructure spending is restricted due to environmental concerns. Instead of investing public funds to build and upgrade reservoirs, aqueducts, and freeways, public agencies can allocate more of their budgets to increasing the pay and benefits for government workers. Local public-sector fiefdoms also benefit when the population is increased in existing jurisdictions. In the past, the integrity of existing suburbs would not be violated, and instead, new cities outside established jurisdictions would gain those new residents and collect the new tax revenue.

Public utilities have a powerful financial incentive to embrace the density agenda and its intimate sibling, the renewables agenda. When people are forced to ration energy and water as more people are crammed into existing neighborhoods, the same utility grids—water, power, and wastewater—can be employed without costly expansion. Never mind that residents will now be restricted to 40 gallons of indoor water use per day, or pay to have expensive dual water meters installed so bureaucrats can impose and monitor an outdoor “water budget.” Never mind that renewable electricity flowing through smart meters will cost households 50 cents or more per kilowatt-hour during peak demand times, or that there will no longer be enough wastewater flowing through the sewer pipes to move the effluent.

Public utilities will deliver less of everything but charge much more. Their revenue will go up even as their deliveries go down. And since their earnings are restricted to a regulated percentage of total revenue, they will make more profit than ever.

Planned Obsolescence Is the New Normal

The density agenda is the product of intersecting benefits that attract a powerful coalition of special interests. In almost every sector of the economy, monopolistic corporate special interests have navigated a profitable path that furthers the shared agenda.

When environmentalist-inspired regulations make it almost impossible to get building permits, public entities collect higher fees, and favored developers build homes they can sell for more money and more profit. When environmentalists litigate to stop the construction of a new

reservoir, public agencies retain the funds for more internally remunerative uses, and the possibility of new home construction is diminished. Without access to water, new homes cannot get built. When homes are too expensive for most families to afford, institutional investors roll in and buy whole subdivisions and rent them all, depriving Americans of what throughout our history was the most reliable way to build generational wealth.

It is crucial to understand the collaborative role of the high-tech industry in all this. Property management by institutional investors, along with the operation of modern appliances by

individual homeowners, will be facilitated by appliances connected to the internet and algorithmically monitored.

Tech firms will secure perpetual and lucrative new revenue streams supplying hardware components for this entire surveillance panopticon, along with collecting fees for mandatory and frequent software updates. Remember the bored Maytag repair man? Those days are done. Technological “upgrades” to enable ultra-efficient appliances mean you’ll replace your refrigerator, washer, dryer, dishwasher, hot water heater, and every other durable good as often as you replace your smartphone. Planned obsolescence, masquerading as green and empowering, is the new normal.

Rationing in all its forms—and seldom ever called by that name—rewards the entrenched elite and harms everyone else.

Banks, institutional investors, mega housing developers, international corporations, tech heavyweights, public utilities, and public agencies all prefer high density. Environmentalism provides cover.

None of this is meant to disparage legitimate expressions of environmentalism. If one wishes to ignore the economic reasons for the high-density movement and ascribe to density proponents purely enlightened motivations, then this comes down to two competing visions of environmentalism and sustainability.

One of them recognizes the importance of building enabling infrastructure so small investors and individual families can afford to live however they wish. Some will prefer the amenities of a densely populated urban core, and others will prefer the ambiance of spacious suburbs. But the notion that Americans are running out of room or resources to build new suburbs is as delusional as the idea that only a “smart” appliance can achieve acceptable levels of efficiency and sustainability. All too often, these are merely opportunistic lies endlessly parroted by journalists who have never examined the facts.

The prevailing vision of environmentalism today, unfortunately, caters to a global oligarchy. They have decided it is in their interests, along with the interests of the planet—most definitely in that order—to preach imminent doom. Stack and pack, do it for the earth, and laugh all the way to the bank.

Edward Ring is a senior fellow of the Center for American Greatness. He is also a contributing editor and senior fellow with the California Policy Center, which he co-founded in 2013 and served as its first president. Ring is the author of Fixing California: Abundance, Pragmatism, Optimism (2021) and The Abundance Choice: Our Fight for More Water in California (2022). This article first appeared in the July 26, 2022 edition of American Greatness.