

August 1, 2022

Jennifer Guetschow  
County of San Luis Obispo, Planning & Building Department  
976 Osos Street, Room 300  
San Luis Obispo, CA 93408

**Subject: Draft Environmental Impact Report for the Dana Reserve Specific Plan (PLN-1119, SUB2020-00047, LRP2020-00007, ED21-094)**

Jennifer Guetschow:

The San Luis Obispo Council of Governments (SLOCOG) appreciates the opportunity to review the Draft Environmental Impact Report (DEIR) for the Dana Reserve Specific Plan (*PLN-1119, SUB2020-00047, LRP2020-00007, ED21-094*). The State of California and Federal Highway Administration designate SLOCOG as the Regional Transportation Planning Agency (RTPA) and the Metropolitan Planning Organization (MPO), respectively, for the region. While SLOCOG does not have permit or regulatory authority for land use proposals, SLOCOG is responsible for planning the long-term viability of the regional surface transportation system, and for programming funds to achieve the objectives of the adopted Regional Transportation Plan and Sustainable Communities Strategy (2019 RTP). SLOCOG staff reviews land use projects, EIRs, and plans to ensure positive outcomes in transportation and land choices within and between our communities. After reviewing the DEIR, SLOCOG submits the following comments.

#### **HOUSING**

As stated in the 2019 RTP, SLOCOG supports the expansion of the region's supply of housing for renters, first-time homebuyers, and the broader workforce to maintain the vitality of the regional economy. In 2019, the eight jurisdictions and SLOCOG began to work collaboratively on solving our regional housing and infrastructure issues. This effort has led to a unanimously adopted regional compact, the inclusion of regional policies in all eight Housing Element updates, and the start of the Regional Housing and Infrastructure Plan. Two regional goals included in the County's Housing Element are to:

- Support policies, actions, and incentives that increase housing development of all types, available to people at all income levels.
- Encourage new development that helps to improve the balance of jobs and housing throughout the Region, providing more opportunities to residents to live and work in the same community.

An action strategy of the 2019 RTP is to encourage local jurisdictions to approve a wide range of housing types in housing-deficient communities and support expanded employment opportunities in housing-rich communities to improve the existing jobs-housing imbalance. As stated on page 2-13, a primary objective of the Specific Plan is to "provide a diversity of housing types and opportunities for home ownership and rental, including affordable homes consistent with the goals and policies of the Housing Element of the General Plan, the County's Inclusionary Housing Ordinance, and regional housing needs." **SLOCOG is encouraged to see residential development that will help the County meet housing allocations established in the 2019 Regional Housing Needs Allocation (RHNA) Plan at various income levels. Additionally, SLOCOG is supportive of the mentioned local preference program for housing to be included in the Development Agreement.**

#### **JOBS-HOUSING BALANCE**

As stated on page 4.17-41 of the DEIR, "the first phase of development would include multi-family residential development (Neighborhoods 1, 2, 3, and 5), affordable housing (Neighborhood 10), commercial development (village commercial and flexible commercial), and a hotel and educational facility. Future development phases would

include additional single-family residential development, a childcare center, a park, and extensions of the pedestrian and bicycle facilities to the larger network in Nipomo." The 2019 RTP supports residential development near existing employment centers. SLOCOG's 2019 RTP and 2019 RHNA both promote and identify improved jobs/housing balances within each of the subregions by distributing more homes, of all income levels, into the "jobs-rich" subregion. The 2019 RTP includes a future development pattern that promotes more jobs, along with necessary investments, into the "housing-rich" subregions (this includes the South County). This results in all subregions moving in the direction of a better jobs/housing ratio (2019 RHNA Plan, p.13), and lessens impacts of congestion on U.S. 101. The 2019 RTP identifies that the South County subregion has a Jobs to Housing ratio of 0.66 in 2015 and is projected to have a Jobs to Housing ratio of 0.69 in the 2035 Preferred Growth Scenario; indicating the need for more job opportunities. Since rural areas and smaller communities are not expected to offer 1:1 job for each home, the subregion (and the region) benefits when the incorporated cities' ratio is notably greater than 1:1. If imbalance in the South County subregion continues at 0.66 or worsens, one result will be increased congestion on our highways, primarily to enter the nearest major employment centers in San Luis Obispo and Santa Maria. **As stated in the DEIR, the residual impacts to the jobs-to-housing ratio would be significant and unavoidable (Class I) which is not consistent with the Jobs/Housing Balance Strategy of the 2019 RTP and the RHNA Plan.**

## **TRANSPORTATION**

Increasing the connectivity of the regional transportation system is a goal of the 2019 RTP. SLOCOG is encouraged by Dana Reserve's Project Objectives to enhance circulation within the DRSP and existing community by continuing the existing public roadway network through the DRSP property to connect to Willow Road, providing a new Park and Ride lot to encourage carpooling, and creating new public transportation points of connection to facilitate public transit use and reduce single-occupant automobile use and to integrate a network of walking, bicycling, and equestrian facilities to connect on-site residential neighborhoods and the broader community (ES-4).

### *Transportation Demand Management (TDM)*

Providing various opportunities to use alternative transportation is important for reaching state and regional goals. SLOCOG has a long history of supporting Transportation Demand Management (TDM) activities through goals and strategies outlined in the 2019 RTP. Additionally, SLOCOG's Regional Rideshare division aims to increase sustainable travel choices through public outreach, education, and encouragement programs. The DEIR's TR Impact 3 is a Class I impact that includes mitigation through the implementation of a transportation demand management program or identification of transportation demand management strategies. **SLOCOG suggests working with SLO Regional Rideshare to incorporate TDM strategies to improve transportation access for residents and visitors since the project would result in Class I impacts to transportation and traffic.**

### *Vehicle Miles Traveled (VMT)*

According to the DEIR's Transportation Impact Study, "the project will have a significant and unavoidable impact to VMT." State and Local goals include both Vehicle Miles Traveled (VMT) and greenhouse gas emission reductions. A best practice is locating jobs and frequently used services close to where people live. By prioritizing commercial uses needed within Dana Reserve, vehicle trips can be reduced and or replaced with bike and walk trips. **Since buildout of the Specific Plan Area would exceed the County VMT thresholds, SLOCOG suggests the developer create a transportation demand management program to implement as part of the first development phase.**

### *Transit*

As stated in the DEIR, improved public transit amenities (e.g., covered transit turnouts, direct pedestrian access, bicycle racks, covered bench, smart signage, route information displays, lighting, etc.) shall be implemented as part of AQ/mm-3.3 "if the project is located on an established transit route." Dana Reserve is not currently served by transit. Mitigation measure TR/mm-3.1 for TR Impact 3 includes improving or increasing access to transit as a protentional measure to reduce Vehicles Miles Traveled (VMT). Since these impacts are significant and unavoidable, **SLOCOG**

**suggests the developer work with the Regional Transit Authority (RTA) to include the new development as part of a served transit route.**

As stated in the DEIR, "the most effective TDM measures would be those related to reducing the cost of transit through commuter benefit programs (employers) and free or reduced-cost transit passes for new residents as part of the HOAs or other conglomeration." **SLOCOG is encouraged by this transit program.**

*Park and Ride Lot*

**SLOCOG looks forward to working with the developer "to create, improve, or expand an on-site or nearby Park and Ride lot with car parking and bike lockers in proportion to the size of the project" (4.3-35).**

Thank you again for the opportunity to provide input. We wish you and all parties involved continued success in moving the Dana Reserve Development forward. SLOCOG looks forward to continued coordination with the County and Developer to address the aforementioned transportation and land use comments. If there are any questions, please do not hesitate to contact me at (805) 781-8052 or [ssanders@slocog.org](mailto:ssanders@slocog.org).

Sincerely,

A handwritten signature in cursive script that reads "Sara Sanders". The signature is written in black ink and is positioned to the left of the typed name.

Sara Sanders, Transportation Planner  
San Luis Obispo Council of Governments