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CAL POLY SAN LUIS OBISPO • CITY & REGIONAL PLANNING

SENIOR PROJECT
SPRING 2010

Orcutt Area Specific Plan

Mixed Use Alternative



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Executive Summary

The Orcutt Area is approximately 231 acres and located south east of the City limits of San Luis Obispo. It is adjacent to Orcutt Road, Tank Farm Road, and the Union Pacific Railroad tracks. This site is mostly flat grassland with Righetti Hill on the south portion of the site and several creeks running from east to west. The area is one of the largest remaining parcels available for development to the city of San Luis Obispo. The City is currently considering building a mixed use development called the Orcutt Area Specific Plan (OASP). This plan proposes 979 residential units and 16,500 square feet of commercial floor area. Approximately 20 acres are dedicated to park space.

SLOPlan, along with several other independent planning consultants to the City, have evaluated different options for potential use of the site. SLOPlan tested a higher intensity Mixed Use Alternative. This was a mixed density, mixed use residential and commercial development at an overall R-2 density under City standards. The proposed development would include 788 dwelling units with approximately 435,000 square feet of retail commercial, parking, and support facilities, 24.9 acres of parks, and 96.7 acres of open space. The design features a mixed use commercial core surrounded by various types of residential housing. There is also a central neighborhood park and a linear park along the railroad tracks.

The Orcutt Area Specific Plan and the new proposal were compared using the initial study environmental checklist. After evaluating the environmental factors for the proposed development, it was determined that the overall impacts were similar in comparison with the Orcutt Area Specific Plan. The only impact that did increase dramatically was Traffic and Circulation. In comparison, the new proposal would result in a net increase of 14,519 Average Daily Trips (ADT) to the Orcutt Area Specific Plan. With this net increase, improvements would have to be made in order to meet the standards for level of service.

Arguments for the mixed use alternative include the plan bringing a unique site design to San Luis Obispo that is walkable and pedestrian oriented, approximately 400 jobs would be created through 435,000 square feet of retail commercial space, the commercial stores would generate an increase in sales tax revenue for the City, and it provides a diversity of housing. Arguments against the mixed use alternative include there not being enough housing to support the commercial space being proposed, the development would compete with San Luis Obispo's downtown and the Madonna Plaza stores, and the plan would generate a significant increase in traffic and there would need to be major improvements to the surrounding roads in order to serve the increased traffic in and around the site. Based on these arguments, it was concluded that the negative impacts of the project outweigh the positive impacts. Overall, it was recommended that the City continue with the existing Orcutt Area Specific Plan.

Chapter I

Introduction

Existing Site

The Orcutt Area is located southeast of the city limits of San Luis Obispo and encompasses approximately 230 acres of land. The site is bounded by Orcutt Road to the north and east, Tank Farm Road to the south, and the Union Pacific Railroad to the west. The Orcutt Area is very scenic with unobstructed views of the surrounding hills. Most of the site is characterized by grasslands that slope up to Righetti Hill, which is situated in the southeastern corner of the site. The Orcutt Area also includes several intermittent creeks and wetlands, and a variety of plant communities.

Currently, the site is primarily vacant although there are a few single-family homes present. These homes are mostly in the western and northeastern

sections of the site. There are also agriculture-related uses on the southern and eastern portions of the site. These uses are designated as Residential Single Family and Agricultural Lands in the County's General Plan Land Use Element.

To the north of the site across Orcutt Road are single-family homes, to the east across Orcutt Road are large-lot, single-family homes, to the south across Tank Farm Road are single-family homes, and to the west is the Union Pacific Railroad. For the purposes of this report, the site is under one ownership. It is the largest piece of property available for development in the city limits or available for annexation.



Panorama of the existing Orcutt Area site.

Consistency with the General Plan

The Orcutt Area is located within the City's Urban Reserve Line (URL). According to the City's General Plan, urban uses should be developed within the URL, and should only be developed if they are annexed into the city. The City's General Plan requires that for the Orcutt expansion area, a specific plan shall be adopted for the whole area before any part of it is annexed.

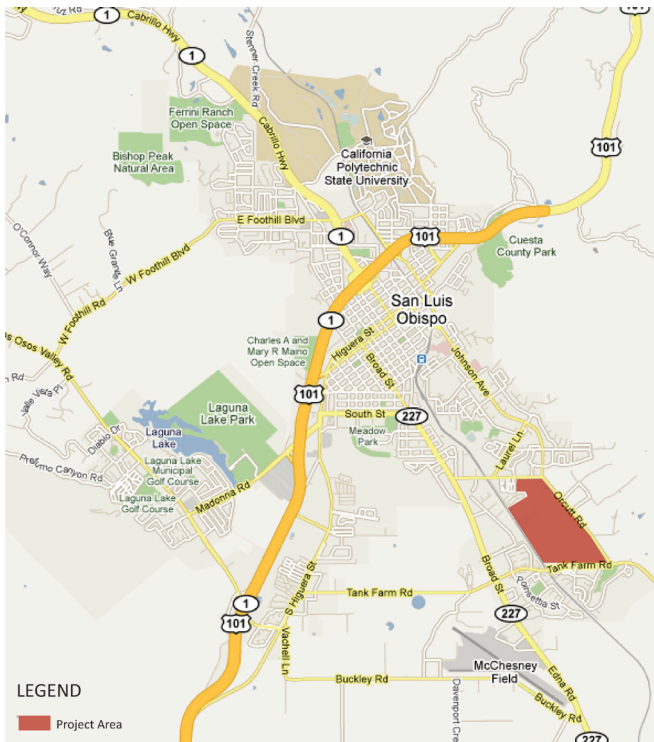
Existing OASP

The current plan for the site is to implement the previously adopted Orcutt Area Specific Plan (OASP). The plan was recommended for adoption by the San Luis Obispo planning commission in December of 2009, and was officially adopted by the city council in March of 2010. The OASP proposes 979 residential units and 16,500

square feet of commercial/office space. The majority of the residential space is devoted to single family homes, but also includes duplexes, multiplex units, and high density apartments. Approximately 20 acres are expected to be park space, which includes a neighborhood park, pocket parks, and trails.

Purpose of this Plan

The plan included in this document provides an alternative design and program to the OASP. This plan proposes an intensified mixed use development with 435,000 square feet of commercial space and 788 dwelling units. The residential types include single family detached homes, townhomes, and apartments. This document analyzes the pros and cons of the new program and site design to see if it would be a better use of the land than the current OASP.



Regional map showing project area

Chapter 2 Design Proposal

The City and property owner have requested evaluation of several alternative development scenarios for the Orcutt Area. The City and property owner are looking for a development that is: creative, exciting, and economically feasible, unifies City and County residents, addresses property owner needs and expectations, and meets City policies and standards. The plans will be tested for the OASP based on fiscal, aesthetic, cultural, and environmental criteria. It will also be tested for uses that optimize the size, location, and opportunities of the site while minimizing negative impacts to the existing neighborhoods.

Development Program

The development program consists of a mixed density, mixed-use residential and commercial development at an overall

Land Use	Acres
Parks	24.9
Townhomes	39.8
Apartment Complex	2.2
Commercial Buildings	10.0
Commercial Plazas	3.4
Mixed Use Apartments	7.4
Roads / Pavement	30.0
SFD	23.1
Open Space	96.7

R-2 density under city standards. The development includes approximately 788 dwelling units with approximately 435,000 square feet of commercial floor area, parking and support facilities, 24.9 acres of parks and 83.5 acres of open space.

Residential

The development program includes a mix of housing types including single-family and multi-family residential areas. The General Plan states that the Orcutt Area residential expansion shall include “desired types and intensities of development, compatible with the surrounding area,” and “a variety of owner and rental housing, including a broad range of prices, sizes, and types.” A mix of housing provides a range of types and intensities, prices, and sizes.

Unit Count		
Housing Type	Density	Units
Townhomes	12	478
Apartment Complex	18	39
Mixed Use Apartments	18	133
SFD	6	139
Total		788

Low Density Residential

The low density residential consists of single-family detached homes. These are at a density of six units per acre, totaling

approximately 139 units. All single family homes are located off entrance 1 along the "A" Street. Lot sizes will vary, but will be an average of 50' x 80'. These homes will be located within walking distance of the central core and neighborhood parks, but will provide residents with privacy and property not available in the other residences.



View of potential single family housing type



View of potential single family housing type

Medium Density Residential

The medium density residential consists of attached townhomes. These are at a density of 12 units per acre, totaling approximately 478 units. The product type being proposed is a large building 150' x 90' with six individual two-story units. Each unit has a one-car



View of potential multi family townhome

garage loaded off an alley street. Landscaped walkways between the buildings maintain an open atmosphere which allows interaction between neighbors.



View of potential multi family townhome

Medium-High Density Residential

The medium-high density residential consists of an apartment complex and mixed-use apartment units. The apartment complex has a density of 18 units per acre, totaling approximately 39 units. The mixed-use apartments are located above commercial. These units have a density of 18 units per acre, totaling approximately 334 units.



View of potential apartment complex

Based on the residential unit count, it is estimated that the development would have a total population of 1,970.

Population Count	1,970
Commercial Floor Area	435,739 s.f.
Employment Count	368

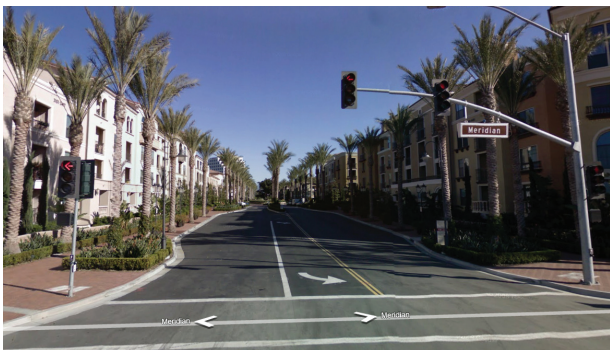
Mixed-Use & Commercial

Mixed-Use

Mixed-Use is development that combines two or more types of uses in a building. This combination can include residential, commercial, office, and industrial or institutional. In this proposal, mixed-use is the combination of residential and commercial uses. Commercial uses are located on the bottom floor, and apartments are located on the top floor. Mixed-use development reduces automobile dependency and promotes walking. Smart growth principles have shown that a mixture of uses is vital and necessary for a healthy urban area.



View of potential mixed use core



View of potential mixed use core

Commercial

The commercial core has a total floor area of 435,739 square feet. It is located at the center of the development, creating a compact and walkable environment. The development would include commercial uses such as a market, post office, hardware

store, bookstore, restaurants, clothing stores, coffee shop, and wine shop and tasting room.

Parks and Open Space

According to the General Plan, Specific Plans for the Orcutt Area residential expansion areas shall include “public parks and open space, and other land that is not to be built on.” Parks and Open Space provide a variety of benefits. These benefits include improving the overall quality of urban life, strengthening the community, an urban oasis, health and recreation, reducing stress, child development, ecological conservation and promoting creativity.

Parks

There are approximately 24.9 acres of parks. This includes two neighborhood parks and one linear park located along the Union Pacific Railroad. These areas will provide residents with a place for exercise and recreation. These parks will be linked to the residences and open space through a series of trails and pathways.



View of potential linear park

Open Space

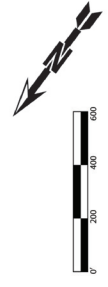
Protection and preservation of open space is another important component of the General Plan. This allows for protection of natural



Perspective view of the proposed mixed use core



Perspective view of the proposed mixed use core



- LEGEND**
- Single Family Detached
 - Townhomes
 - Mixed Use
 - Apartments
 - Parks

Illustrative Site Plan

2. Design Proposal

resources including Righetti Hill, as well as creeks, wetlands, and riparian corridors on the site. The development program includes approximately 83.5 acres of open space.

Site Character

The city of San Luis Obispo has created a physical identity for itself through architectural styling and urban form. The downtown area has been able to maintain the small-town-feel desired by the residents while continuing to remain economically viable. The proposed project will have a unique character while staying true to the established identity of San Luis Obispo. The central core will have the atmosphere of an urban downtown with commercial stores on the ground floor and residential units on the second floor. The four commercial buildings at the intersection of “A” Street and “E” Street will feature two stories of commercial, with exterior stairs leading to an outdoor walkway on the upper floor.

Design

The design proposal is centered around a mixed-use commercial core. The main entrance is located at the corner of Orcutt Road and “A” Street. This entrance leads into the commercial core of the site. The intersection of “A” Street and “E” Street is the central gathering point of the site, as it contains commercial buildings on all four of its corners. All buildings along both of these streets are built to the edge of the sidewalk, creating a small town urban atmosphere. The commercial core was located in this spot to both create a central gathering place as well as to reduce visual and noise impacts on existing residences in the area. Between the commercial area and Orcutt Road are single family detached homes. This provides

a transition space from the existing single family homes to the north of the project site to the higher density uses being proposed.

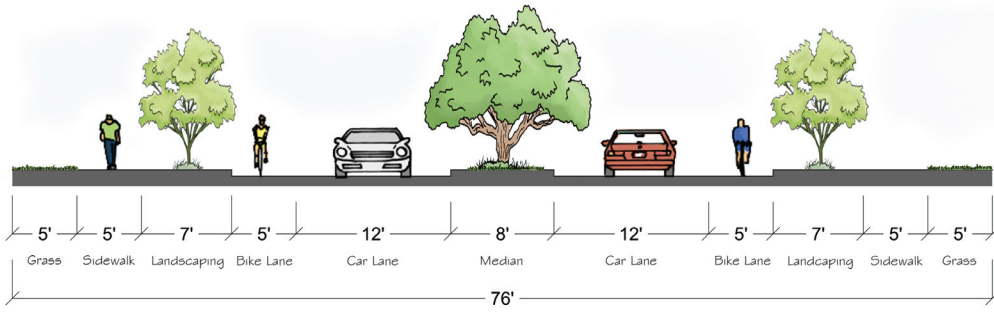
The mixed use core includes commercial buildings on the ground floor and apartment units on the second floor. In addition to the mixed use apartment units, there will also be an apartment complex located next to the linear park. To the southeast of the commercial core is a large neighborhood park. The park stretches to the north across “B” Street and “G” Street. This is another primary gathering point of the site. It is centrally located between all residences, allowing easy access from everywhere on the site. This space, along with the linear park located along the western edge of the site, makes up approximately 25 acres of parkland. The residences to the north, east, and south of the neighborhood park are primarily townhomes. These units will feature larger buildings consisting of 6 attached units in a row, with garages loaded on an alley street. The site also avoids development on all creeks running through the site and integrates them into the design of the plan. The eastern block of the mixed use core contains a restaurant and patio adjacent to one of the creek banks.

Circulation

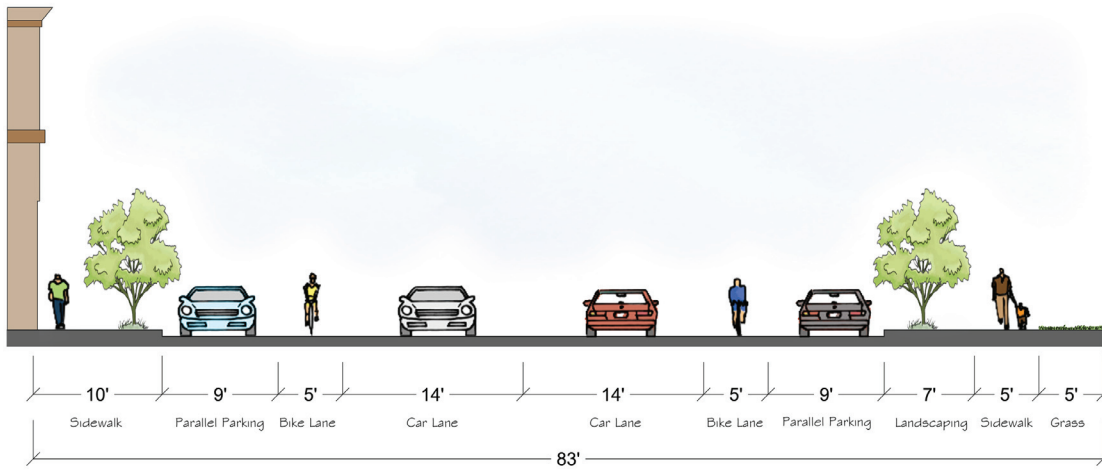
Vehicular circulation enters the site through four entrances. Entrance 1 is located off of Orcutt Road and is considered to be the primary entrance to the site. This entrance, along with Entrances 2 and 3, use a wide road to lead into the central core of the site. The main circulation roads are broken up into a hierarchy of three different types of streets—main entrances, commercial side streets, and commercial core. All three types have a pedestrian sidewalk and one vehicular lane traveling in each direction. The main entrance roads contain a vegetated 8-foot

median and 7 feet of landscaping between the road and the sidewalk. The commercial side streets feature a wider vehicular lane, parallel parking, and no central median. The commercial core features 18-foot diagonal parking and 13-foot sidewalks (including landscaping) extending to the commercial store fronts. The plan also includes a comprehensive trails plan extending into the open space of the site. These trails allow easy access for pedestrians and bicyclists to travel between the residential areas, commercial areas, and parks.

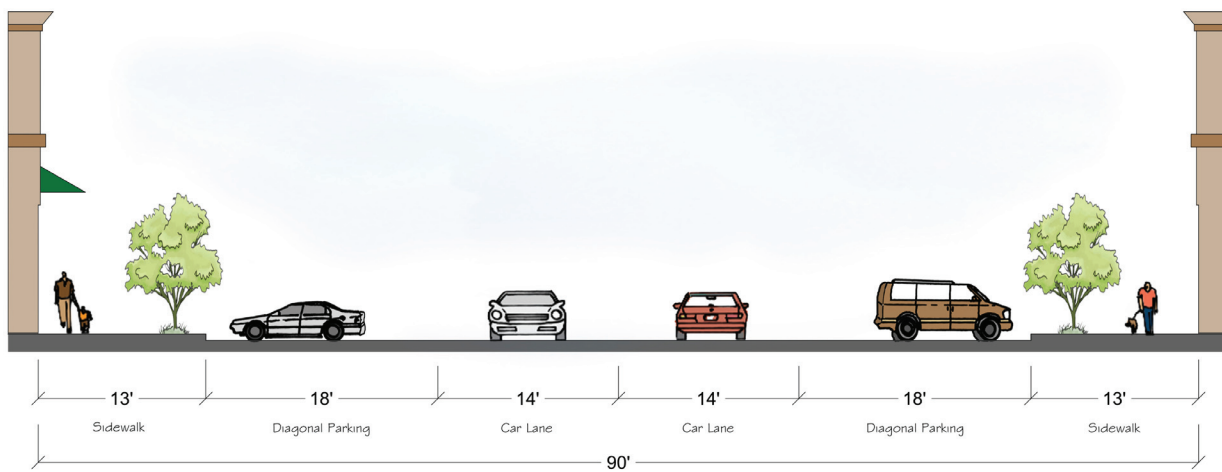
The site is currently served by San Luis Obispo bus lines 1 and 3. Line 3 runs along the north, east, and south edges of the site. Line 1 runs along only the northern edge of the site. There are four existing transit stops bordering the site. Two are located on Orcutt Road at Laurel and Johnson, and two are located on Tank Farm Road at Wavertree and Brookpine.



Main Entrances

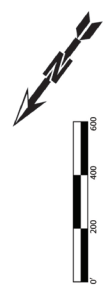
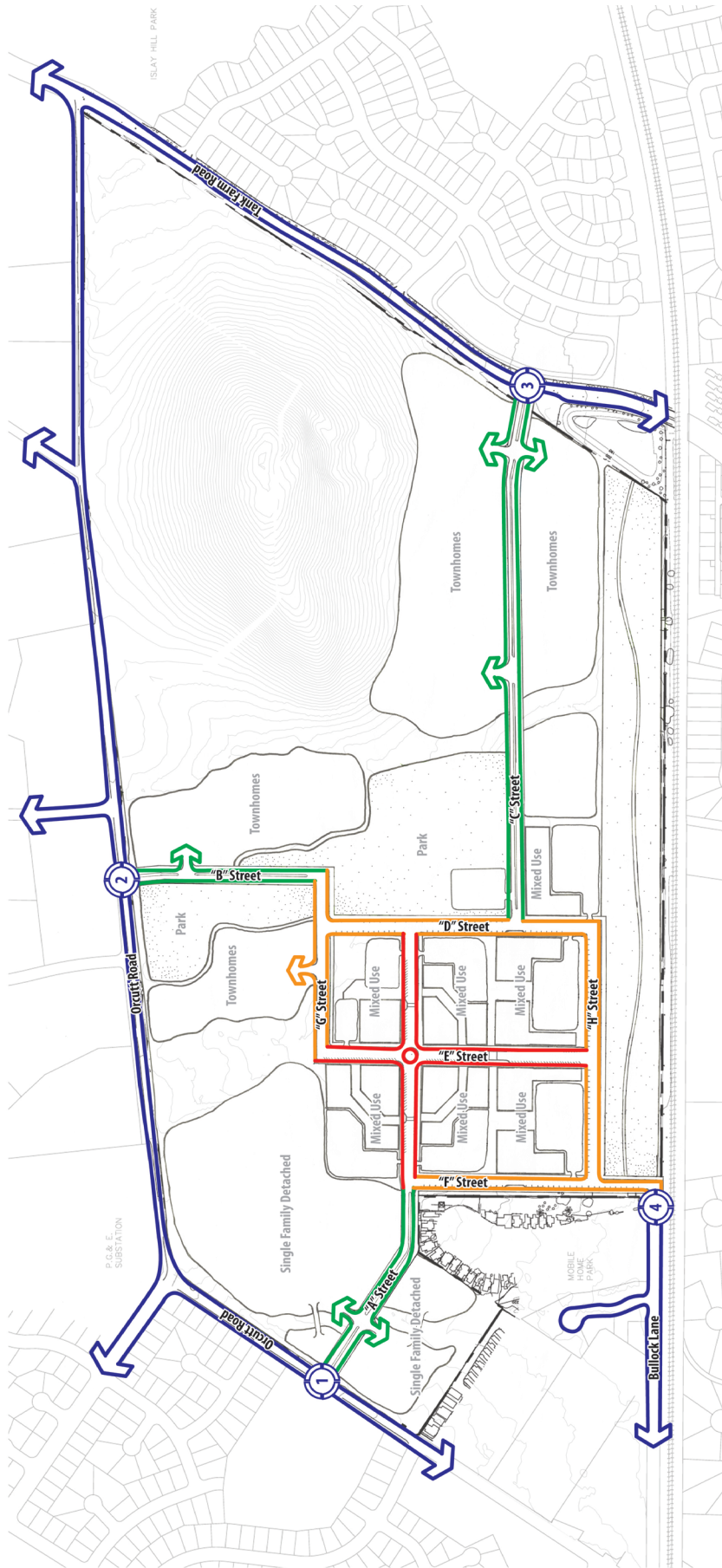


Commercial Side Streets



Commercial Core

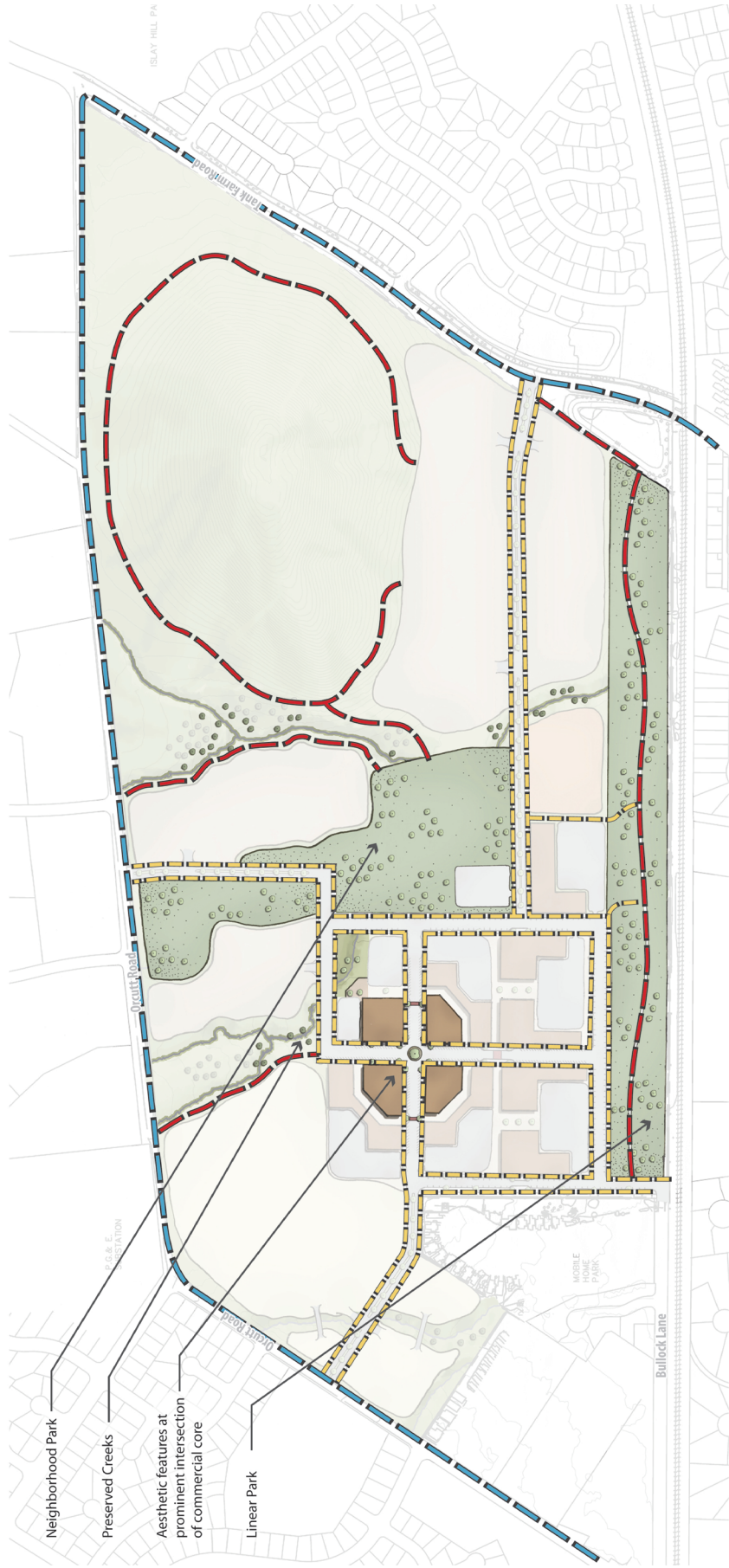
Proposed Street Sections



- LEGEND**
- Existing Circulation
 - Main Entrances
 - Commercial Side Streets
 - Commercial Core
 - Site Entrances

Master Circulation Map

2. Design Proposal



LEGEND

- Proposed Pedestrian Path
- Proposed Class I Bike Path
- Proposed Class II Bike Path
- Existing Pedestrian Path
- Existing Class II Bike Path
- Proposed Bike Trail

Features Plan

Chapter 3

Development Impacts

Summary of Impacts

The Orcutt Area Specific Plan and the new proposal were compared using the initial study environmental checklist. The initial study determines whether a proposed project would likely result in significant environmental effects. The initial study follows the adopted Guidelines for the Implementation of the California Environmental Quality Act. Various environmental factors were looked at for both the Orcutt Area Specific Plan and the new proposal including aesthetics, biological Resources, geology/soils, hydrology/water quality, land use and planning, noise, population and housing, public services, transportation and traffic, and several other issues.

After evaluating the environmental factors for the new proposal, it was determined that the overall impacts were similar in comparison with the Orcutt Area Specific Plan. The only impact that did increase dramatically was Traffic and Circulation. Currently, Transportation and Circulation for the Orcutt Area Specific Plan EIR have Class II Impacts. The proposed developed would generate 25,429 ADT, or an additional 14,519 ADT in comparison to the OASP. The OASP had an original 10,910 ADT.

According to the City's Circulation Element, significant impacts are defined to occur when:

- The addition of project traffic causes intersection operations to degrade from an acceptable level (LOS D or better) to an unacceptable level (LOS E or F);
- Project traffic is added to an intersection operating at LOS E or F;
- The addition of project traffic causes intersection operations to degrade to an unacceptable level and Project Condition volumes satisfy the peak-hour signal warrant from the Manual on Uniform Traffic Control Devices (MUTCD), or
- The project's access to a major street causes a potentially unsafe situation or requires a new traffic signal.

At build-out, the OASP has levels of service that exceed standards. Based on the new proposal's additional ADT and the definition of significant impacts, the increase is most likely significant enough to be considered a Class I Impact. Determination of whether it would be classified as a Class I Impact would require a more thorough traffic analysis.

Offsite Improvements

Orcutt Road and Tank Farm Road are the arterial streets serving the Orcutt Area. One of the challenges presented in development of the Orcutt Area was access for higher intensity land uses, given the existing conditions of Orcutt Road Tank Farm Road. The proposed development of the Orcutt Area is expected to add approximately 25,429 ADT. The OASP is expected to add approximately 10,910 ADT. In comparison, the new proposal would result in a net increase of 14,519 ADT to the Orcutt Area Specific Plan. With this net increase, improvements would have to be made in order to meet the standards for level of service.

NEW PLAN					
Land Use	Units OR Sq Ft (in thousands)	AM Peak Multiplier	AM Peak Trips	ADT Multiplier	ADT Trips
Residential					
Single Family Home	139	0.75	104	9.55	1,327
Apartment Building	173	0.41	71	6.63	1,147
Townhome	478	0.44	210	10.71	5,119
Total Residential			386		7,594
Commercial	435	5.00	2,175	41.00	17,835
Total Trip Generation			2,561		25,429

OLD PLAN					
Land Use	Units OR Sq Ft (in thousands)	AM Peak Multiplier	AM Peak Trips	ADT Multiplier	ADT Trips
Residential					
Single Family Home	540	0.75	405	9.55	5,157
Apartment Building	103	0.41	42	6.63	683
Townhome	336	0.44	148	10.71	3,599
Total Residential			595		9,438
Commercial	36	5.00	180	41.00	1,472
Total Trip Generation			775		10,910

Net Increase in New Plan: 1,786 AM Peak
14,518 ADT

Chapter 4

Analysis & Research

Arguments For Plan

One argument in favor of the plan is that it brings a unique site design to San Luis Obispo. A mixed use development of this scale has not yet been built in the city. It would provide a new type of sustainable and walkable environment that is currently being encouraged in the development industry. The design features will allow all residents of the neighborhood to be within walking distance of a large variety of commercial stores, parks, trails, and open space. The entire site will be heavily pedestrian oriented with sidewalks and trails linking all portions of the area.

Another argument in favor of the plan is the job creation. There are two land use designations that contain commercial in the new proposal: commercial, and mixed-use. These commercial uses require employees to run these businesses and in turn create jobs. The commercial floor area is approximately 435,000 square feet. Based on this square footage and average number of employees per square foot, an employment count was determined. There will be approximately 1 employee per every 1,184 square feet of commercial retail space. It is estimated that there will be approximately 368 jobs created by the new proposal. "A carefully planned community has a relatively even ratio of jobs

to housing. Ideally, such a balance would allow people to go to work without having to commute long distances." This is also known as the jobs-housing balance. The new proposal adds jobs and therefore helps in creating jobs-housing balance as well.

The third argument in favor of the plan is sales tax revenue. Sales taxes are one of the largest sources of revenue for state governments. Sales tax is a consumption tax that is added on to the price of goods or services, and is a percentage of the sale price. The seller, at the point of sale, collects sales taxes from the buyer. The seller then remits the tax to a government agency. The three biggest uses of sales tax revenue are transportation expenditures (i.e. highways, roads, and bridges), public education, and aid to local governments. Currently, California's sales tax rate is 8.25%. The statewide 8.25% is allocated as follows:

- 8.25% - State
 - 5.00% - State – General Fund
 - 0.25% - State – Fiscal Recovery Fund
 - 0.50% - State – Local Revenue Fund
 - 0.50% - State – Local Public Safety
 - 1.00% - Uniform Local Tax
 - 0.25% - Local County Transportation
 - 0.75% - Local City/County Operation

Some cities levy a small local sales tax. These revenues help fund general city expenditures such as street maintenance, police and fire protection.

The commercial uses in the new proposal will have the sale of goods and services, and most if not all of these goods and services will have a sales tax on them. A portion of this sales tax will go to the local government including the state, county, and city. The funding goes towards general expenditures that will benefit both the government agencies and general public. The new proposal would therefore generate a considerable amount of sales tax, adding to the local government's funding.

The final argument in favor of the plan is diversity of housing. As stated by the City's General Plan, many segments of San Luis Obispo's population have difficulty finding affordable housing, including elderly persons, families, single parent households, people with disabilities, very low and low-income residents, and the homeless. Housing costs in San Luis Obispo have risen significantly in recent years while average household incomes have risen gradually or remained steady. Also, San Luis Obispo's neighborhoods traditionally have been made up mostly of low-density, detached single-family housing. A growing gap between household income and housing costs, along with a lack of housing variety is forcing many to seek housing outside the City.

In the City of San Luis Obispo's General Plan, one of the basic objectives in the Housing Element includes: "to help develop more affordable housing, and a wider variety of housing, to meet the City's housing needs for the current planning period." This includes providing mixed-income housing, and housing variety and tenure. Goal 4 of the Housing Element states: "Preserve and accommodate existing and new mixed-income neighborhoods and seek to prevent

neighborhoods or housing types that are segregated by economic status." This can be accomplished by providing housing that is affordable to various economic strata, as well as including both market-rate and affordable units. Goal 5 of the Housing Element states: "provide variety in the location, type, size, tenure, and style of dwellings." This can be accomplished by encouraging the integration of special-use housing into developments or neighborhoods, mixed-use residential/commercial projects, and the development of housing above ground-level retail stores. This provides housing opportunities close to activity centers and uses land efficiently. In general, housing developments should provide a variety of dwelling types, sizes or forms of tenure.

The new proposal provides both mixed-income housing, and housing variety and tenure. This includes single-family detached homes, townhomes, an apartment complex, and mixed-use apartments. These different types of housing range in price, size, and tenure. The development includes both owner and rental units. It's important to provide a selection of housing with desired types and intensities of development that are compatible with the surrounding area. This diversity of housing allows for people of various income levels and of different lifestyles to live within the development.

Arguments Against Plan

As stated in the previous section, there are many positives that would come from building the proposed project. There are also several drawbacks and citywide problems that would be created if the project were to be built. The first is that there would not be enough housing to support such a large commercial development. The development program includes 435,739 square feet of commercial building space,

or approximately 10 acres. According to Edward Kaiser's *Urban Land Use Planning*, a development of this size would serve approximately 150,000 people. This could create problems, as the entire population of San Luis Obispo was most recently reported as being about 47,000. A project of this size would need to rely heavily on visitors from out of town. Due to San Luis Obispo's isolated location, there are only a few locations in the city which can successfully draw from other areas. These areas, such as Madonna Plaza and Downtown, are located adjacent to Highway 101, allowing easy access for people traveling through the city. The Orcutt area, however, is located over 3 miles from the nearest freeway entrance. Additionally, the project site is located at the southern edge of the city. Few people drive on Broad Street south of Tank Farm Road unless they are going to the County Airport or to the Golf and Country Club. This results in little traffic passing through to attract people to the site.

The second major problem would be the development's impact on existing commercial stores in downtown San Luis Obispo. The city council has stated that new developments should not detract from the economic stability of downtown. A commercial development of this size would be in competition downtown stores as well as the nearby Madonna Plaza, which currently has approximately 600,000 square feet of commercial retail space. Although the site design is well planned and has certain elements that could be successful, the project is not well suited for the proposed location.

The final and largest drawback of the proposed project is the traffic impacts. As determined by the initial study environmental checklist, the new proposal would cause a significant increase in traffic. This would cause the LOS to exceed

to unacceptable levels. In order to support a development of this size, there would need to be major improvements to the surrounding roads in order to serve the increased traffic in and around the site.

Strategies

Community Outreach Strategy

Community outreach is an important part of planning. "A plan that accurately reflects the community's interests, concerns, and priorities will have greater legitimacy and long-term success." Community outreach is a way to engage interested parties, raise public awareness, and generate public input. It can be done through questionnaires, community-based meetings, and/or notices.

Chapter 5

Conclusions & Recommendation



After analyzing the site's size, location, and proposed development program, it has been determined that the negative impacts of a project of this scale would outweigh the positive impacts for the city of San Luis Obispo. The commercial space would be too large for the area's population, which would not be able to support the retail stores. The project would also have too significant of an impact on the existing retail stores downtown, which would likely lose some of their business to the new stores being built. Additionally, the surrounding roads would need to undergo major improvements in order to serve the increased traffic in and around the site. It is recommended that the city continue with the existing Orcutt Area Specific Plan.

Appendices

Appendix A: Case Study - Woodbury Village

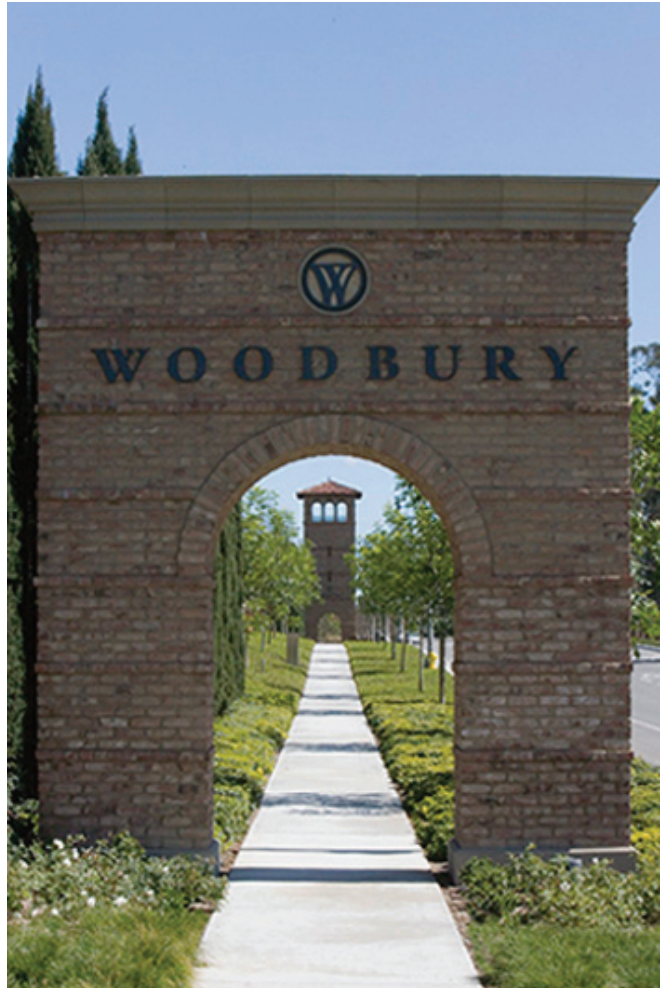
Appendix B: Case Study - Spectrum Village

Appendix C: Initial Study

Appendix A: Case Study – Woodbury Village

The Villages of Irvine is located in Irvine, California. They provide a small town feel with easy access to the City of Irvine. There are four different villages within the development. Each offers various architectural options, abundant landscaping, and amenities such as pools, athletic fields, and community centers. The Villages of Irvine also includes 50,000 acres of parks, trails, and open space. Shopping and entertainment is close to the Villages of Irvine, with Irvine Spectrum Center and The Market Place.

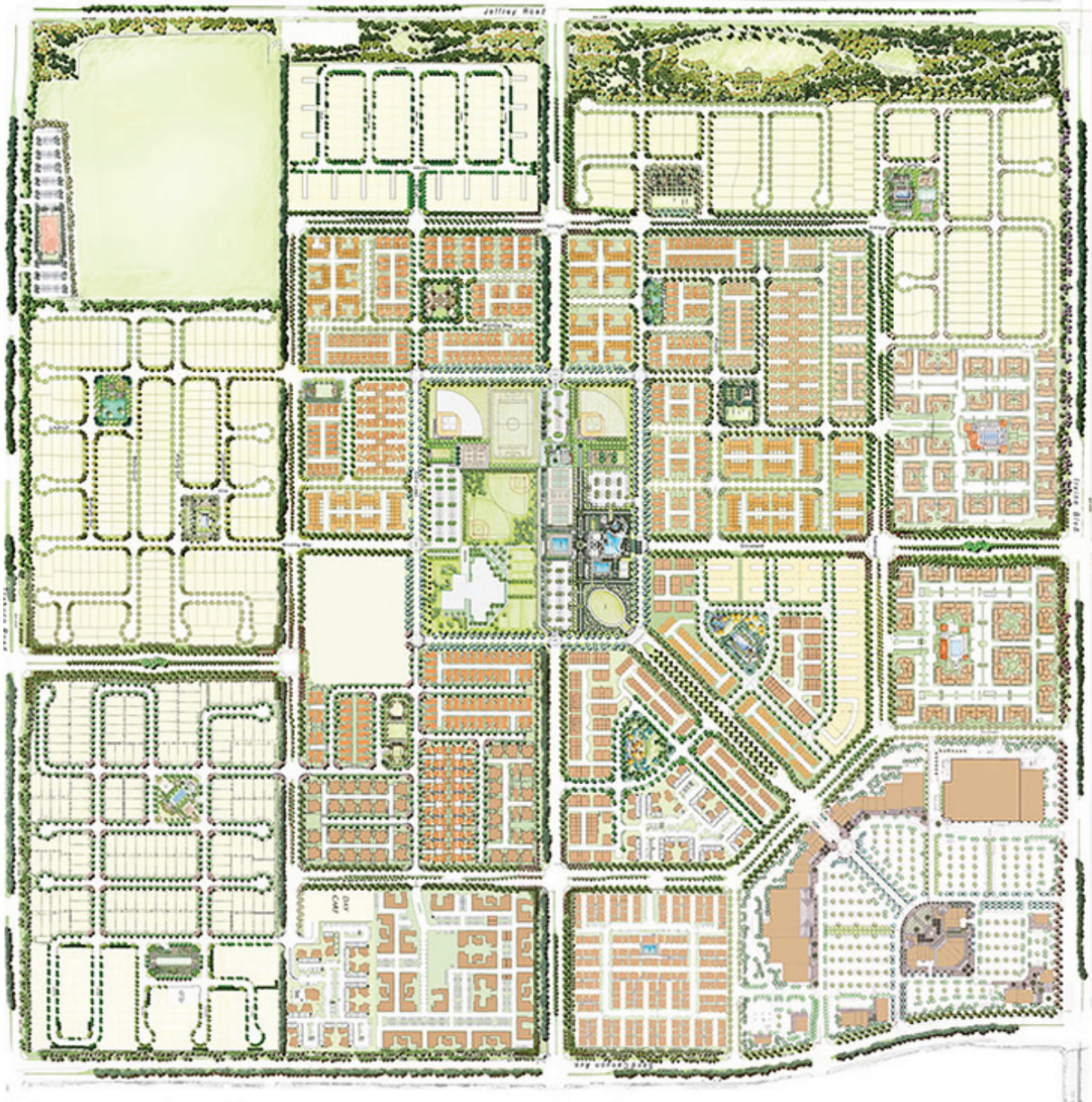
Woodbury is one of the neighborhoods within The Villages of Irvine. This Village features The Commons, a 30-acre gathering place which is the central feature of the site. It provides a large community pool, baseball fields, and other areas for recreation. The neighborhood also features 16 parks, miles of trails, and schools within walking distance. Down the street from the Villages of Woodbury is Woodbury Town Center which consists of restaurants and grocery stores. Along the northern edge of the site is a long linear park to allow residents to get from one edge of the site to the other easily. This case study will help the design of the Orcutt Area by showing how a variety of different housing types, including single family detached, townhomes, and apartments, can be placed within walking distance of a large commercial space and parks. of using this project as a case study will be to use their urban design techniques to create an effective site plan.



Entrance to Woodbury



Commercial entrance to the Woodbury shopping center



Site plan of the Woodbury Village

Appendix B: Case Study – Spectrum Village

The Spectrum Village is located in Irvine, California where the 405 Freeway meets the 5 Freeway. The project is a mixed use development consisting of small commercial stores and high density apartments. The commercial stores consist mostly of uses such as coffee shops, a post office, a market, and a dry cleaner. The apartments are separated into several different areas by two main axial roads. Each of these areas has their own private courtyard, community pool, and recreational facilities. The apartments are built 4 stories tall with residences above the commercial units. The total site is 31 acres and contains 1,550 units which houses over 3,000 residents. The site caters to pedestrians through the use of wide sidewalks along the main streets and diagonal street parking in front of the commercial stores.

This development provides a similar mixed use type of project that is being proposed in the Orcutt Area. However, the commercial area is smaller and there are almost twice as many residential units in the Spectrum Village. Although there is less commercial on-site, the village is located across the street from the Spectrum Entertainment Center, a large successful retail center providing over 1 million square feet of commercial stores. The main benefit of using this project as a case study will be to use their urban design techniques to create an effective site plan.



View of the four story apartments



Site plan of the Spectrum Village



View of the mixed use core

INITIAL STUDY ENVIRONMENTAL CHECKLIST FORM

1. Project Title:

Orcutt Area Mixed Use

2. Lead Agency Name and Address:

City of San Luis Obispo, Public Works Department
919 Palm Street, San Luis Obispo, CA 93401

3. Contact Person and Phone Number:

Environmental Review: Pam Ricci, Senior Planner
Phone: (805) 781-7168

Project Design: Dan Van Beveren, Senior Civil Engineer
Phone: (805) 781-7200

4. Project Location:

The area of land north of Tank Farm Road between the train tracks and Orcutt Road in San Luis Obispo.

5. Project Sponsor's Name and Address:

City of San Luis Obispo, 990 Palm Street, CA 93401

6. General Plan Designation:

The site is not currently located within city boundaries, but it is located within the city's Urban Reserve Line. The city's general plan states that areas like this should be developed with urban uses, and should only be developed if they are annexed into the city.

7. Zoning:

The site is not currently located within city boundaries, and therefore does not have a zoning designation for the City. The County has zoned the site as agricultural.

8. Description of the Project:

The proposed project is a mixed-use development, which should include at least 450 dwelling units, 500,000 square feet of retail commercial and professional office floor area, parking, and support facilities. The project will be developed at an overall density of R-2 under City standards. The dwelling units will include single family detached homes, townhomes, and apartments. The single family units will be for sale, the apartments will be for rent, and the townhomes will be based on market needs. The project will have a suburban feel on the outer edges and a more centralized urban core.

9. Surrounding Land Uses and Settings:

The area is directly surrounded by industrial and residential uses, but the larger area to the east is mostly undeveloped open space.



ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact” as indicated by the checklist on the following pages.

	Aesthetics		Geology/Soils		Public Services
	Agricultural Resources		Hazards & Hazardous Materials		Recreation
	Air Quality		Hydrology/Water Quality	X	Transportation & Traffic
	Biological Resources		Land Use and Planning		Utilities and Service Systems
	Cultural Resources		Noise		Mandatory Findings of Significance
	Energy and Mineral Resources		Population and Housing		

FISH AND GAME FEES

	There is no evidence before the Department that the project will have any potential adverse effects on fish and wildlife resources or the habitat upon which the wildlife depends. As such, the project qualifies for a de minimis waiver with regards to the filing of Fish and Game Fees.
	The project has potential to impact fish and wildlife resources and shall be subject to the payment of Fish and Game fees pursuant to Section 711.4 of the California Fish and Game Code. The earlier initial study was circulated to the California Department of Fish and Game for review and comment.

STATE CLEARINGHOUSE

	This environmental document must be submitted to the State Clearinghouse for review by one or more State agencies (e.g. Cal Trans, California Department of Fish and Game, Department of Housing and Community Development). The public review period shall not be less than 30 days (CEQA Guidelines 15073(a)).
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DETERMINATION:

On the basis of this initial evaluation:

I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.	
I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made, or the mitigation measures described on an attached sheet(s) have been added and agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.	
I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.	
I find that the proposed project MAY have a “potentially significant” impact(s) or “potentially significant unless mitigated” impact(s) on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed	X
I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (1) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (2) have been avoided or mitigated pursuant to that earlier EIR of NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.	

Signature

June 8, 2010

Date

Printed Name

For: John Mandeville,

Community Development Director



EVALUATION OF ENVIRONMENTAL IMPACTS:

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the analysis in each section. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g. the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g. the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts. The explanation of each issue should identify the significance criteria or threshold, if any, used to evaluate each question.
3. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect is significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
4. "Potentially Significant Unless Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section 17, "Earlier Analysis," may be cross-referenced).
5. Earlier analysis may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063 (c) (3) (D) of the California Code of Regulations. Earlier analyses are discussed in Section 17 at the end of the checklist.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g. general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.



Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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	Source	Potentially Significant	Less than significant with mitigation	Less than significant	No impact
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1. AESTHETICS. Would the project:

a) Have a substantial adverse effect on a scenic vista?		X			
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, open space, and historic buildings within a local or state scenic highway?		X			
c) Substantially degrade the existing visual character or quality of the site and its surroundings?		X			
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			X		

The proposed development consists of approximately 1,000 residential units and 400,000 square feet of commercial space. The central area of the site is expected to contain buildings of up to 35 feet. From certain perspectives, views of the surrounding hills will be blocked. Building heights decrease as they move further away from the site center, and the impact will be less significant there. The development will also have an impact on the development of land which is currently open space. The site is one of the largest contiguous pieces of open space the City can still develop, and the proposed project would build on nearly all of it. The character of the site will be greatly changed, as it will go from natural open space to a mixed use residential/commercial development.

With regards to overall aesthetic impacts, there is not a large difference between the proposed plan and the existing Orcutt Area Specific Plan. Both plans develop on the same areas of land and contain similar types of buildings. The only difference would possibly be the building height of the central core, which may be slightly taller in the new plan.

2. AGRICULTURE RESOURCES. Would the project:

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?					X
b) Conflict with existing zoning for agricultural use or a Williamson Act contract?					X
c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use?					X

The project would not adversely affect agricultural land. Unlike the Orcutt Area Specific Plan, the new plan does not propose development in the area located near the existing Righetti ranch house. This area requires a 100 foot agricultural buffer for development. Since the new plan doesn't build there, there is no impact.

3. AIR QUALITY. Would the project:

a) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?				X	
b) Conflict with or obstruct implementation of the applicable air quality plan?				X	
c) Expose sensitive receptors to substantial pollutant concentrations?					X
d) Create objectionable odors affecting a substantial number of people?				X	
e) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed qualitative thresholds for ozone precursors)?				X	

The project is consistent with population assumptions in the General Plan and the SLO County Clean Air Plan. Air quality



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was considered a significant and unavoidable impact in the Orcutt Area Specific Plan because they had proposed development outside of the Urban Reserve Line (URL). The new plan does not proposed development outside the URL, therefore it would be a less than significant impact as long as it is consistent with population assumptions of the General Plan.

4. BIOLOGICAL RESOURCES. Would the project:

a) Have a substantial adverse effect, either directly or indirectly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?			X		
b) Have a substantial adverse effect, on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?			X		
c) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (e.g. Heritage Trees)?					X
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of wildlife nursery sites?				X	
e) Conflict with the provisions of an adopted habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				X	
f) Have a substantial adverse effect on federally protected wetlands as defined in Section 404 of the Clean Water Act (including, but not limited to, marshes, vernal pools, etc.) through direct removal, filling, hydrological interruption, or other means?			X		

The new development will be building on the same area as the Orcutt Area Specific Plan, so it will have the exact same effect on biological resources and species. According to the OASP EIR, there is the potential to disturb special status plant species and plant communities on the site. There are also several small wetlands located on the eastern half of the site. Both the OASP and the new plan propose development over these areas. Off-site mitigation would need to take place for this to happen.

5. CULTURAL RESOURCES. Would the project:

a) Cause a substantial adverse change in the significance of a historic resource? (See CEQA Guidelines 15064.5)			X		
b) Cause a substantial adverse change in the significance of an archaeological resource? (See CEQA Guidelines 15064.5)			X		
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				X	
d) Disturb any human remains, including those interred outside of formal cemeteries?			X		

The impacts of the proposed development would be the same as the Orcutt Area Specific Plan. A historian should be hired to review all buildings older than 50 years old. If any are determined to be historically significant, proper mitigation must be done to relocate or avoid the structure.

6. ENERGY AND MINERAL RESOURCES. Would the project:

a) Conflict with adopted energy conservation plans?					X
b) Use non-renewable resources in a wasteful and inefficient manner?					X
c) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the					X



Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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State?

The OASP and the new proposal would have similar impacts.

7. GEOLOGY AND SOILS. Would the project:

a) Expose people or structures to potential substantial adverse effects, including risk of loss, injury or death involving:			X		
I. Rupture of a known earthquake fault, as delineated in the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area, or based on other substantial evidence of a known fault?			X		
II. Strong seismic ground shaking?			X		
III. Seismic-related ground failure, including liquefaction?			X		
IV. Landslides or mudflows?			X		
b) Result in substantial soil erosion or the loss of topsoil?			X		
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off site landslides, lateral spreading, subsidence, liquefaction, or collapse?			X		
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?			X		

The OASP and the new proposal would have similar impacts.

8. HAZARDS AND HAZARDOUS MATERIALS. Would the project:

a) Create a significant hazard to the public or the environment through the routine use, transport or disposal of hazardous materials?					X
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?					X
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?					X
d) Expose people or structures to existing sources of hazardous emissions or hazardous or acutely hazardous materials, substances, or waste?				X	
e) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, it would create a significant hazard to the public or the environment?					X
f) For a project located within an airport land use plan, or within two miles of a public airport, would the project result in a safety hazard for the people residing or working in the project area?			X		
g) Impair implementation of, or physically interfere with, the adopted emergency response plan or emergency evacuation plan?				X	
h) Expose people or structures to a significant risk of loss, injury, or death, involving wildland fires, including where wildlands are adjacent to urbanized areas or where residents are intermixed with wildlands?				X	

The OASP and the new proposal would have similar impacts. The proposed project would not produce or emit any significant hazardous materials or waste. However, the site is located near the San Luis Obispo Regional Airport. This would



Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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create a potentially significant impact unless it is properly mitigated.

9. HYDROLOGY AND WATER QUALITY. Would the project:

a) Violate any water quality standards or waste discharge requirements?					X
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g. The production rate of pre-existing nearby wells would drop to a level which would not support existing land uses for which permits have been granted)?					X
c) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide additional sources of runoff into surface waters (including, but not limited to, wetlands, riparian areas, ponds, springs, creeks, streams, rivers, lakes, estuaries, tidal areas, bays, ocean, etc.)?			X		
d) Substantially alter the existing drainage pattern of the site or area in a manner which would result in substantial erosion or siltation onsite or offsite?				X	
e) Substantially alter the existing drainage pattern of the site or area in a manner which would result in substantial flooding onsite or offsite?			X		
f) Place housing within a 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?					X
g) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?					X
h) Will the project introduce typical storm water pollutants into ground or surface waters?				X	
i) Will the project alter ground water or surface water quality, temperature, dissolved oxygen, or turbidity?				X	

The OASP and the new proposal would have similar impacts.

10. LAND USE AND PLANNING. Would the project:

a) Conflict with applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect?			X		
b) Physically divide an established community?				X	
c) Conflict with any applicable habitat conservation plan or natural community conservation plans?			X		

The OASP and the new proposal would have similar impacts. The OASP includes the following impacts: establishing open space and low density residential land uses outside the current City Urban Reserve Line (URL), inconsistent with growth management goals of preserving open space and agriculture, land use designations that allow for 750 to 1,000 (979) dwelling units, more than is planned for the Orcutt Area in the General Plan, inconsistent with City’s Community Design Guidelines, and inconsistent with the ALUP.

The proposed project is located on the same site, outside the URL. It would contain approximately 989 dwelling units at 6-18 units/acre, which is inconsistent with the General Plan. The General Plan calls for 500-700 dwelling units for the Orcutt Area at 8-10 units/acre. In comparison to the OASP, the new proposal would include “desired types and intensities of development, compatible with the surrounding area,” “a variety of owner and rental housing, including a broad range of prices, sizes, and types,” and supporting uses, all of which are consistent with the General Plan.

11. NOISE. Would the project result in:

a) Exposure of people to or generation of “unacceptable” noise			X		
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levels as defined by the San Luis Obispo General Plan Noise Element, or general noise levels in excess of standards established in the Noise Ordinance?					
b) A substantial temporary, periodic, or permanent increase in ambient noise levels in the project vicinity above levels existing without the project?			X		
c) Exposure of persons to or generation of excessive ground borne vibration or ground borne noise levels?			X		
d) For a project located within an airport land use plan, or within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?			X		

The OASP includes the following impacts: add to roadway corridor noise levels already above the 60 DBA Ldn City threshold, which is considered a Class I, significant and unavoidable impact, construction would temporarily generate high noise levels on-site, place additional sensitive receptors in the vicinity of the Union Pacific Railroad tracks, and generated traffic would incrementally increase noise levels along roads in the Specific Plan vicinity.

The proposed project would have similar noise impacts. The development would add to roadway corridor noise levels, and construction would temporarily generate high noise levels on-site. The new proposal would have a linear park along the Union Pacific Railroad tracks to serve as a noise buffer. The plan contains more commercial than the OASP, which would generate more noise from pedestrian and vehicular traffic. Also, more commercial generates more traffic, which would increase noise levels along roads in the vicinity of the Specific Plan.

12. POPULATION AND HOUSING. Would the project:

a) Induce substantial population growth in an area, either directly (for example by proposing new homes or businesses) or indirectly (for example, through extension of roads or other infrastructure)?			X		
b) Displace substantial numbers of existing housing or people necessitating the construction of replacement housing elsewhere?			X		

The proposed project would induce substantial population growth in the area, both directly and indirectly. The plan proposes both new homes and business, and would extend roads and other infrastructure. Also, the plan would remove all existing units, which would displace substantial numbers of existing housing and people.

13. PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision, or need, of new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

a) Fire protection?			X		
b) Police protection?			X		
c) Schools?			X		
d) Parks?				X	
e) Roads and other transportation infrastructure?			X		
f) Other public facilities?				X	

The OASP includes the following impacts: increase the number of residents served by the San Luis Obispo Fire Department, increase the number of residents served by the San Luis Coastal Unified School District, and annexation and development of the Orcutt Area would increase the number of residents served by the San Luis Obispo Police Department.

The proposed plan would have similar public services impacts. It would increase the number of residents served by the San Luis Obispo Fire Department, San Luis Obispo Police Department, San Luis Coastal Unified School District. The plan proposes 24.9 acres of parks, consistent with City standards, and the construction of roads and necessary infrastructure.

14. RECREATION. Would the project:

a) Increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical				X	
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Issues, Discussion and Supporting Information Sources ER # 43-07	Sources	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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deterioration of the facility would occur or be accelerated? b) Include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?			X		
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The new proposal includes neighborhood and regional parks and recreational facilities on the site. Therefore, the development would not increase the use of existing neighborhood or regional parks or other recreational facilities. The plan would include recreational facilities which would require the construction of.

15. TRANSPORTATION/TRAFFIC. Would the project:

a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system?			X		
b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads and highways?			X		
c) Substantially increase hazards due to design features (e.g. sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?			X		
d) Result in inadequate emergency access?				X	
e) Result in inadequate parking capacity onsite or offsite?			X		
f) Conflict with adopted policies supporting alternative transportation (e.g. bus turnouts, bicycle racks)?				X	
g) Conflict with the with San Luis Obispo County Airport Land Use Plan resulting in substantial safety risks from hazards, noise, or a change in air traffic patterns?			X		

The OASP includes the following impacts: addition of traffic to Baseline traffic volumes would cause one study roadway segment and one intersection to operate at unacceptable levels during peak hours (Orcutt Road/Tank Farm Road), addition of traffic would cause one study roadway segment and five intersections to operate at unacceptable levels during peak hours (Broad Street/South Street-Santa Barbara Road, Broad Street/Tank Farm Road, Orcutt Road/Johnson Avenue, Orcutt Road/Tank Farm Road, Broad Street, Prado Road Extension), and site access and internal circulation roads can result in safety hazards for all users.

The proposed project would have greater transportation/traffic impact than the OASP. The development would cause a substantial increase in traffic, and generate more traffic than the OASP (See ADT Table).

16. UTILITIES AND SERVICE SYSTEMS. Would the project:

a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?				X	
b) Require or result in the construction or expansion of new water treatment, waste water treatment, water quality control, or storm drainage facilities, the construction of which could cause significant environmental effects?				X	
c) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new and expanded water resources needed?				X	
d) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitment?				X	
e) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?				X	
f) Comply with federal, state, and local statutes and regulations related to solid waste?				X	

The OASP and the new proposal would have similar impacts.

17. MANDATORY FINDINGS OF SIGNIFICANCE.



Issues, Discussion and Supporting Information Sources ER # 43-07	Sources	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?			X		
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Compared with no-project, long-term impacts will be beneficial. Mitigation designed into the project is expected to reduce short-term impacts to insignificance.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of the past projects, the effects of other current projects, and the effects of probable future projects)			X		
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Other, similar projects may be undertaken by the City, private landowners, or other organizations. At this time, none are proposed for simultaneous construction. Projects based on the same design principles and incorporating the same types of mitigation will not have cumulative, adverse impacts.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			X		
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The project will not adversely affect environmental resources used by humans, nor the adjacent human community.

18. EARLIER ANALYSES.

Earlier analysis may be used where, pursuant to the tiering, program EIR, or other CEQA process, one or more effects have been adequately analyzed in an earlier EIR or Negative Declaration. Section 15063 (c) (3) (D). In this case a discussion should identify the following items:

a) Earlier analysis used. Identify earlier analysis and state where they are available for review.

b) Impacts adequately addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

c) Mitigation measures. For effects that are "Less than Significant with Mitigation Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions of the project.



