

Addendum 1 - Summary of EIR changes



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To: Warren Frace, Director
Community Development Department, City of Paso Robles

Project: Olsen/South Chandler Ranch Specific Plan

From: Chris Bersbach, Senior Project Manager/Program Manager

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Re: Olsen/South Chandler Ranch Specific Plan, Final EIR Summary for Planning Commission

This memorandum responds to a request from the City of Paso Robles (City) for a summary of the topics and concerns in the Olsen/South Chandler Ranch Specific Plan Final EIR. Per the City's request, this memorandum focuses on public and resource agency comments received during the Draft EIR public review period, responses to comments, and revisions/clarifications made to the Draft EIR and incorporated into the Final EIR.

Response to Comments and Major Topics of Concern

The Draft EIR was circulated for a 45-day public review period from October 18, 2019 to December 2, 2019. During this period, the City received 59 comment letters from members of the public and resource agencies. Responses to these comments as well as minor text changes to the Draft EIR have been incorporated into the Final EIR. The major environmental topics of concern expressed in public and resource agency comments involved traffic, water supply, air quality, agricultural buffers, and growth/community character. The complete public and resource agency comment letters and the City's

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responses to the environmental topics of concern are included in Section 8, Response to Comments, in the Final EIR.

Traffic

Several commenters voiced concern that new vehicle trips associated with the project would worsen traffic conditions in the City. In response to these concerns, the Final EIR summarizes the methods and conclusions of the Transportation Impact Analysis prepared by Central Coast Transportation Consulting and the transportation facility mitigation measures required in Section 4.16, *Transportation/Traffic*. The Final EIR lists the study area intersections, roadway facilities, and freeway facilities that would be significantly impacted due to project-generated traffic. Impacted facilities include intersections with State Route 46, Creston Road, and other local intersections near the Specific Plan area that are currently operating at or near capacity, as well as segments of Niblick Road and U.S. 101.

Some commenters were concerned with traffic impacts at specific locations and facilities in the City, including roadways and intersections near Quail Run Mobile Home Estates, roadways adjacent to Virginia Peterson Elementary School, Charolais Road, and the three Salinas River bridge crossings used by motorists to connect between west and east Paso Robles. The Final EIR includes detailed responses summarizing the findings of the EIR analysis at each of the identified facilities and identifies the required transportation facility mitigation measures for each impacted facility. Mitigation measures required in the Final EIR include applicant payment of traffic impact fees that would fund transportation system improvements included in the City's fee program as well as implementation of specific transportation system improvements that are not included in the City's fee program.

Potential mitigation at freeway segments and intersections with State facilities would require Caltrans coordination and approval, which results in uncertainty regarding timing and implementation, making mitigation at these facilities potentially infeasible. At 1st Street-Niblick Road/Spring Street and Niblick Road/South River Road, feasible mitigation identified by the City would not return queues to pre-project levels. The Niblick Corridor Study identifies infrastructural constraints, including the lack of availability of right-of-way width to accommodate additional lanes on the Niblick Road bridge and right-of-way constraints at Niblick Road/South River Road. No feasible mitigation has been identified that would reduce the capacity impacts on the segments of Niblick Road east of Spring Street or Creston Road east of Ferro Lane. As a result, the Final EIR concludes that transportation impacts at several facilities in the City would be significant and unavoidable.

These conclusions did not change in the Final EIR as a result of public comments received. As a result, the City would be required to adopt a Statement of Overriding Considerations that describes the specific economic, social, technological, or other considerations that outweigh the significant and unavoidable transportation impacts from the project.

Water Supply

Multiple commenters expressed concerns regarding water availability in the region and whether the project would strain existing water resources. The Final EIR response to these comments summarizes the findings of the Water Supply Analysis prepared for the project by Todd Groundwater in August 2019. The Water Supply Analysis determined that the water supply needed to serve the project was accounted for in the 2015 Urban Water Management Plan supply and demand projections, which concluded that sufficient water supply exists to serve the City under normal and drought conditions through the year 2045. The Final EIR also discusses the Groundwater Sustainability Plan for the Paso Robles Groundwater Basin, which was adopted by the City Council on December 17, 2019. The Groundwater Sustainability Plan is intended to guide the Paso Robles Groundwater Basin water users, including vineyard operations, in the future sustainable management of groundwater resources to prevent chronic lowering of groundwater levels, reduction of groundwater storage, degraded water quality, land subsidence, and

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surface water depletions throughout the Groundwater Basin, which include areas inside and outside of the City, and will lead to the sustainable management of the Groundwater Basin by 2040.

Air Quality

Several commenters expressed concerns regarding potential air quality impacts and health effects on residents due to the project. In response, the Final EIR summarized the results of the Air Quality & Greenhouse Gas Assessment prepared for the project by Ambient Air Quality & Noise Consulting and the Draft EIR air quality analysis. These analyses concluded that the project would be consistent with San Luis Obispo Air Pollution Control District's (SLOAPCD's) 2001 Clean Air Plan and that construction air quality impacts would be reduced to a less than significant level with implementation of required air quality mitigation measures. Air quality mitigation includes alternative transportation and transportation demand management measures, land use emission reduction measures, and construction dust and emission control strategies. The project would not significantly impact the health of nearby residents with the implementation of demolition emissions controls and Valley Fever suppression measures.

The Draft EIR concluded that operational and cumulative air quality impacts would be significant and unavoidable because the project would exceed SLOAPCD's daily operational thresholds even with the incorporation of required land use emission reduction measures. These conclusions did not change in the Final EIR as a result of public comments received. As a result, City decision makers would be required to adopt a Statement of Overriding Considerations that describes the specific economic, social, technological, or other considerations that outweigh the significant and unavoidable air quality impacts from the project.

Agricultural Buffers

A commenter expressed a concern about agriculture pesticide drift from the Huerhuero Vineyard and explained that the vineyard has been fined for pesticide drift violations. The commenter states that the 50-foot buffer between the agriculture use and residential uses in the Specific Plan should be revised to reflect a buffer of ¼ mile from the perimeter of the Huerhuero Vineyard.

The Final EIR explains that the City has identified 50 feet as an acceptable buffer between residential uses and vineyards, which was established as a precedent in 2017 by the City Council as part of the River Oaks 2 tract map. The Final EIR includes agricultural conflict avoidance measures and agricultural fencing requirements that provide a minimum of 50 feet between active agricultural land uses outside the Specific Plan area and new habitable structures in the Specific Plan area. Mitigation Measure AG-2(a) in the Final EIR has been revised to include requirements that new agriculture uses within the Specific Plan area, which would include new vineyards, be managed without the use of pesticide applications using aircraft, airblast sprayers, sprinklers, dust, powders, or fumigants (application methods prohibited within ¼ mile of a school site under California Code of Regulations, Title 3, Sections 6690-6692).

Growth/Community Character

Several commenters expressed the opinion that new development associated with the project would negatively impact the small-town feel of Paso Robles. Growth projections for the City completed by the San Luis Obispo Council of Governments indicate that the City of Paso Robles will grow by approximately 6,299 new residents and 2,916 housing units by the year 2050. The Draft EIR compares the anticipated growth associated with the project and concludes that population growth associated with the project would not exceed local and regional growth projections. The Draft EIR explains that the density of new development in the Specific Plan area would be comparable to existing development west and south of the Specific Plan area, and that urban development of the Specific Plan area is anticipated in the Paso Robles General Plan. The project would be required to adhere to the design standards of the General

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Plan and would be subject to discretionary review by the Planning Commission and/or City Council. These conclusions did not change in the Final EIR as a result of public comments received.

Changes to the Draft EIR

The Final EIR incorporates text revisions and clarifications to the Draft EIR based on public comments received during the public review period, to clarify information presented in the Draft EIR, or based on new regulatory or policy guidance since preparation of the Draft EIR. The Responses to Comments (Section 8 of the Final EIR) and the Draft EIR as revised collectively comprise the Final EIR for the Olsen/South Chandler Ranch Specific Plan. Text changes to the Draft EIR are shown in the Final EIR in strikethrough (for deleted text) and underline (for new text additions). Notable revisions and clarifications to the Draft EIR are summarized below:

- Impact AG-2 in Section 4.2, *Agricultural Resources*, has been revised to add discussion of the project's consistency with California Code of Regulations related to pesticide use and required buffers from sensitive land uses. Additional text was added under Long Term Conflicts at Residential and School Uses to specify that the Paso Robles Unified School District would be responsible for compliance with California regulations and to highlight applicable General Plan policies that would ensure land use conflicts would be minimized. Mitigation Measure AG-2(a) was revised to add a provision to require agricultural uses within the Specific Plan area to manage pesticide applications consistent with California Code of Regulations.
- Table 4.3-2 and Table 4.3-5 in Section 4.3, *Air Quality*, of the Draft EIR have been updated to be consistent with the tables in the Air Quality Assessment in Appendix C.1.
- Page 4.3-12 in Impact AQ-1 in Section 4.3, *Air Quality*, has been revised with a population growth discussion to clarify the Final EIR's conclusion that the project would be consistent with the 2001 CAP.
- Mitigation Measure AQ-1 in Section 4.3, *Air Quality*, has been revised to incorporate SLOAPCD's recommendation that the Specific Plan ensure a majority of the Specific Plan area falls within ¼ mile of a transit stop.
- Impact GHG-2 in Section 4.8, *Greenhouse Gas Emissions*, has been revised to include a discussion of the project's vehicle miles travelled to more clearly explain the project's consistency with the 2019 Regional Transportation Plan.
- Impact PS-3 and Table 4.14-3 in Section 14, *Public Services*, was modified to include updated student generation factors in the Paso Robles Unified School District's December Residential Development School Fee Justification Study.

The revisions to the Draft EIR summarized above and included in the Final EIR do not constitute significant new information that would require recirculation of the Draft EIR pursuant to State CEQA Guidelines Section 15088.5. The information presented in this letter can be found in Section 8, Response to Comments and in the sections specified above in the Final EIR.