

7.0 LONG-TERM IMPLICATIONS OF THE PROJECT AND SIGNIFICANT EFFECTS THAT CANNOT BE AVOIDED

7.1 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

The Guidelines for the California Environmental Quality Act (CEQA), Section 15126.2(c), require that an Environmental Impact Report (EIR) consider and discuss significant irreversible changes that would be caused by implementation of the proposed project. The CEQA Guidelines specify that the use of nonrenewable resources during the initial and continued phases of the project should be discussed because a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary and secondary impacts (such as a highway improvement that provides access to a previously inaccessible area) should also be discussed because such changes generally commit future generations to similar uses. Irreversible damage can also result from environmental accidents associated with the project and should be discussed.

Project development would cause an irreversible commitment of the agricultural land to urban uses. After the 50- to 75-year structural lifespan of the buildings is reached, it is improbable that the site would revert to an undeveloped state. Once developed, the proposed project would have indefinitely altered the characteristics of the project site (both the Development project site and the Wastewater Treatment Plant expansion site) from one characterized by agricultural land uses or vacant land to one characterized by a variety of mostly impervious surfaces associated with residential, commercial, recreation, and public facility uses.

Construction of the proposed project would result in a commitment of limited, slowly renewable, and nonrenewable resources. Such resources may include certain types of lumber and other forest products; raw materials such as steel; aggregate materials used in concrete and asphalt such as sand and stone; water; petrochemical construction materials such as plastic; and petroleum-based construction materials. In addition, fossil fuels used by construction would be consumed. Project construction would also result in an increased commitment of public maintenance services such as waste disposal and treatment.

Similarly, implementation of the proposed project would result in the commitment of limited, nonrenewable resources and slowly renewable resources such as natural gas, electricity, petroleum-based fuels, fossil fuels, water, and agricultural resources. Natural gas and electricity would be used for lighting, heating, and cooling of buildings and operation of project facilities, including residential uses. Although this represents an increase in demand for both resources when compared to existing project site conditions, the increases would be within the existing delivery capacity of service providers. The project would not result in a significant impact related to either the provision of natural gas or electricity. In addition, Title 24 of the California Code of Regulations (CCR) requires conservation practices that would limit the amount of energy consumed by the proposed project. Compliance with Title 24 is mandated by State law. Nevertheless, the use of such resources would continue to represent a long-term commitment of essentially nonrenewable resources.

The project site also requires an increase in the use of potable water. As discussed in Section 4.14, Water and Wastewater, the total average daily project demand for potable water at project build out is estimated to be 177,362 gallons per day (gpd). Sufficient water supplies are available to service the project, and project impacts are less than significant. However, the increase in water use would continue to represent a long-term commitment of this essentially nonrenewable resource.

Also, as discussed in Section 4.6 of this EIR, implementation of the proposed project would result in direct impacts to 11 acres (ac) of Blue Oak Savannah habitat, 15 ac of California Annual Grassland habitat, 6 ac of Coyote Bush Scrub, and 5 ac of Ruderal (disturbed) habitat. In addition, the proposed project would result in the conversion of approximately 552 ac designated for agricultural land uses to nonagricultural use. In addition, site topography would be modified per the conceptual grading plans. The existing ravines would continue to exist; however, some of the rolling topography would be flattened for use as building pads and roads.

As discussed in Chapter 6.0 of this EIR, the proposed project could result in removal of obstacles to growth. This could result in secondary environmental impacts (e.g., additional traffic and biological impacts), and may also increase the use of nonrenewable resources and energy to serve new development.

In summary, the commitment of limited, slowly renewable, and nonrenewable resources required for construction and operation of the proposed project will limit the availability of these resources for future generations or for other uses during the life of the project. The proposed project would result in the significant irreversible commitment of land to urban uses and the long-term commitment of other renewable and nonrenewable resources.

7.2 SIGNIFICANT EFFECTS THAT CANNOT BE AVOIDED

Section 15126.2(b) of the State CEQA Guidelines requires that an EIR describe significant environmental impacts that cannot be avoided, including those effects that can be mitigated but not reduced to a less than significant level. The Executive Summary of this document contains a detailed summary table that identifies the project's environmental impacts, proposed mitigation measures, and the level of impact significance after mitigation. The following is a summary of the impacts that are considered significant and unavoidable after all mitigation is applied. These impacts are also described in detail in Chapter 4.0, Existing Environmental Setting, Environmental Analysis, and Impacts and Mitigation Measures.

7.2.1 Inventory of Significant Unavoidable Adverse Impacts

Land Use.

Land Use Compatibility. Development that is incompatible with existing military uses includes any land use activity or civilian development activity that adversely affects the utility or training and readiness missions of a military installation. Implementation of the proposed project would result in the introduction of residential, commercial, recreation, public facilities, and open space uses in close proximity to Camp Roberts. At its nearest point, the proposed Development project site is located approximately 210 feet (ft) from the Camp Roberts boundary. The nearest

residential area would be located approximately 715 ft from the Camp Roberts boundary. Mitigation Measure 4.1.2 requires that potential buyers (or leasers) be furnished with a written copy of a Military Use Real Estate Disclosure Statement upon the transfer of any real property on the Development project site. The real estate disclosures would acknowledge that livability and enjoyment of property by an owner (or leaser) may be limited by military training and readiness missions at Camp Roberts. The real estate disclosure would state that the property in question may be subject to high noise levels as a result of flight operations, munitions testing, or other military operations. Although implementation of Mitigation Measure 4.1.2 would inform potential residents of possible land use compatibility impacts between Camp Roberts and residential uses, it would not reduce potential compatibility issues to a less than significant level. Therefore, the proposed project would result in a significant unavoidable adverse project impact related to its proximity to a military installation and contribute to a significant unavoidable adverse cumulative impact related to land use compatibility with nearby military uses.

Divided Community. The proposed project would result in the subdivision of the Development project site into 361 parcels and construction of 389 residential units along with a variety of commercial, recreation, public facilities, and open space uses on the Development project site. The proposed project is not an “infill” development, and the Development project site is physically separated from the existing San Miguel Urban Area by United States Route 101 (US 101). Implementation of the proposed project would require expansion of the San Miguel Urban Reserve Line (URL) and annexation of the Development project site into the San Miguel CSD service area. If implemented, the project would create a divided community, with the existing San Miguel Urban Area located east of US 101 and the proposed San Miguel Ranch development located west of US 101. The two sides of the San Miguel Urban Area would be connected by existing roadways under US 101. Although the project would not physically disrupt or divide the existing established community, it would alter the shape and character of the San Miguel Urban Area. Therefore, the proposed project would result in a significant impact related to the creation of a divided community. The County may require additional trail (pedestrian) linkages between the Development project site and the San Miguel Urban Area as condition of approval, but such linkages would not mitigate impacts related to the creation of a divided community. Due to the location of the San Miguel Urban Area east of US 101, the location of the Development project site west of US 101, and the size and scale of the proposed project (i.e., it would roughly double the size of the San Miguel Urban Area), this impact would be significant and adverse. Due to the Development project site’s location and size and the project’s scale, this impact cannot be mitigated below a level of significance.

Aesthetics. The proposed project would result in significant unavoidable adverse impacts related to the visual environment. These significant unavoidable adverse impacts would be the result of the following.

- The project’s adverse effect on the Scenic Resources Area (SRA)
- The extent of silhouetting above primary ridgelines

- The loss of rural visual character at the northern gateway to San Luis Obispo County
- The appearance of visual sprawl-type growth outside of the Community of San Miguel

Even with incorporation of Mitigation Measures 4.3.1–4.3.10, these adverse visual impacts would remain significant (CEQA Class I); because of the inherent scale and unavoidable visibility of the development, the existing rural character and scenic values would be permanently altered.

As identified in the Salinas River Area Plan, San Miguel is a gateway to the County. The project as currently designed would redefine this gateway landscape from one of rural agriculture and open space to one of highway-serving commercial and dense suburban development. This significant adverse alteration to the visual gateway character would be unavoidable, even with mitigation.

Agriculture. The proposed project would result in significant unavoidable adverse impacts related to agricultural resources. These significant unavoidable adverse impacts would be the result of the following:

- Redesignation of the Development project site from Agriculture (AG) to a variety of non-agricultural land use designations
- Inconsistency with County goals and policies regarding the preservation of agricultural uses
- Conversion of 552 ac of agricultural uses to urban uses
- Results in conditions that could hasten the conversion of off-site agricultural areas

Although Mitigation Measures 4.4.1a and 4.4.1b provide the County with two feasible options to mitigate for the loss of Prime soils including (1) the conservation of an area of equal size and quality, or (2) the payment of fees to conserve an area of equal size and quality, implementation of these mitigation measures would not avoid, minimize, or otherwise directly mitigate the identified impacts. Because agricultural land with the physical characteristics conducive for agricultural production is a finite resource, any reduction in the amount of land where agricultural activities are permitted by right represents a significant unavoidable adverse impact.

Biological Resources. The San Joaquin kit fox (*Vulpes macrotis mutica*) is federally listed as endangered and State listed as threatened. The United States Fish and Wildlife Service (USFWS) and the California Department of Fish and Game (CDFG) consider the area between Camp Roberts and the Carrizo Plain to be part of a movement corridor for the San Joaquin kit fox (USFWS 2007). The USFWS also considers Camp Roberts and its vicinity to be suitable habitat (USFWS 2007). All of the San Miguel Ranch property is considered San Joaquin kit fox habitat and part of an important kit fox movement corridor.

The proposed project would result in both direct and indirect impacts to San Joaquin kit fox. Construction activities and residential uses could inadvertently kill any kit fox that enter the project area and could disturb animals on off-site lands adjacent to the Development project site. Project design and residential use would impede the movement of kit fox across the site. The proposed project would result in a significant barrier to movement by kit foxes in this region, affecting animal

movements between Camp Roberts and the Carrizo Plain. Fragmentation of the movement corridor for kit fox may further isolate this species' western range from the remainder of the range. While the project as proposed would retain some open space as heavily managed multi-use areas, the proposed corridors would be small and heavily trafficked by residents and pets. Proposed open space areas on the Development project site would not serve effectively as adequate movement corridors for San Joaquin kit fox.

Mitigation Measure 4.6.2 may reduce the impacts to San Joaquin kit fox through implementation of a Habitat Conservation Plan (HCP), identification and monitoring of potential dens prior to each phase of construction, implementation of protection measures during construction, and preservation of off-site lands at a ratio of 4:1; however, the feasibility of these mitigation measures is in question due to the lack of adequate nearby suitable mitigation lands available for purchase. In addition, even with implementation of Mitigation Measure 4.6.2, potential impact to the San Joaquin kit fox would remain significant and adverse because of the Development project site's integral location between the Carrizo Plains and Camp Roberts. Therefore, the proposed project would result in a significant unavoidable adverse impact to the San Joaquin kit fox.

Air Quality. The proposed project would exceed the thresholds for short-term nitrogen oxides (NO_x) and fugitive dust (PM₁₀) emissions and long-term emissions of NO_x, reactive organic gases (ROGs), and coarse particulate matter with a diameter of 10 microns or less (PM₁₀). Therefore implementation of the proposed project would result in significant, unavoidable short term air quality impacts associated with NO_x and significant, unavoidable long-term air quality impacts associated with NO_x, ROG, and PM₁₀. In addition, the proposed project would be inconsistent with the Clean Air Plan because it requires a General Plan Amendment to allow the redesignation of the site for agriculture uses to urban uses.

Noise. Camp Roberts is located to the north and west of the proposed Development project site. Noise sources within Camp Roberts include aircraft noise, small arms range noise, and blast noise from large weapons.

Aircraft Noise. Aircraft operations within Camp Roberts include four typical events. These events include simulated bombing and strafing, Twin Brothers drop zone, Nacimiento drop zone, and Nap of the Earth flying. The simulated bombing and strafing and the Nap of the Earth flying are located along the western edge of Camp Roberts away from the proposed residences. The flight paths for the Twin Brothers and Nacimiento drop zones travel directly over the proposed Development project site. The Twin Brothers and Nacimiento drop zones are used by low-performance cargo and personnel aircraft such as C-130 cargo planes. Although noise generated from overflight would not exceed the County's 60 dBA Community Noise Equivalent Level (CNEL) exterior noise standard for sensitive land uses, it would exceed the County's daytime noise threshold of 70 dBA L_{max} and the nighttime noise threshold of 65 dBA L_{max}. There is no feasible way of mitigating noise impacts from overflights to a less than significant level. Therefore, the location of the proposed project under the flight paths of Camp Roberts would result in a significant unavoidable noise impact.

Blast Noise. Blast noise within Camp Roberts is generated by artillery/mortar rounds, grenades, and explosives. The closest blast sites to the proposed Development project site are located approximately 2 miles to the west. At this distance the blast noise levels would not exceed the County's 60 dBA CNEL exterior noise standard¹ but would exceed the County's daytime noise threshold of 70 dBA L_{max} and the nighttime noise threshold of 65 dBA L_{max}. Therefore, although infrequent, the blast noise within Camp Roberts would result in significant unavoidable adverse noise impacts.

Population Growth. The project would result in a substantial direct population growth associated with proposed residential development not anticipated in the County's General Plan. In addition, the extension of wastewater infrastructure to the Development project site, the expansion of the USL, and increased capacity of the Wastewater Treatment Plant would facilitate population growth on the Development project site. This unplanned growth would cause physical environmental effects on limited resources and other environmental issue areas including agricultural resources, biological resources, potable water, sensitive visual areas, traffic, air quality, and noise. No specific mitigation is solely applicable for reduction of the number of residents, based on the project as proposed. Therefore, the substantial growth in population remains a significant, unavoidable, adverse impact.

Public Services and Utilities.

Police Services. In a memo dated January 2, 2008, the San Luis Obispo County Sheriff Department reported that in order to maintain the current ratio of sworn officers (1.4 sworn deputies per 1,000 capita) after project implementation, two additional sworn officers would be required. Additional sworn officers would also need to be hired for the commercial development. The need for additional deputies would be considered by the San Luis Obispo County Board of Supervisors as part of its annual budgeting process. The proposed project could add sales tax in addition to property tax revenue to the County General Fund, which could be used to pay the salaries of additional deputies. There may, however, be a delay between the time the deputies are needed to maintain current staffing ratios and the time when the proposed project generates sufficient taxes (e.g., property taxes and/or sales taxes) to pay the deputies' salaries. As such, the proposed project may result in a short-term significant adverse impact related to police services.

Library Services. Implementation of the proposed project would contribute to an existing deficiency related to library services by increasing the potential use demand. According to library standards provided by the San Luis Obispo City-County Library, to accommodate project build out the San Miguel Urban Area should have a library of at least 1,951 sf.² To accommodate anticipated growth and fund necessary physical improvements, the County of San Luis Obispo requires impact fees to be paid for residential and nonresidential developments, as outlined in the San Luis Obispo Public Facilities Financing Plan. Although the proposed project would be

¹ *Camp Roberts Installation Environment Noise Management Plan*, December 2000.

² Estimated library space demand is based on the existing San Miguel Urban Area population (1,608) added to the projected project build-out population (1,179), for a total of 2,787 people.

required to pay a fair-share cost of expanding the San Miguel Branch Library, there are currently no plans to expand the facility. In addition, the proposed project would contribute to an existing deficiency in library space (i.e., the library is undersized by 351 ft in the existing condition). The payment of fees would mitigate the project's long-term impacts to library services; however, the short-term impact of the project on library services (i.e., the time between project completion and expansion of the library) would remain significant and adverse. Until the County proposes, approves, and implements plans to enlarge the San Miguel Library or build a second library facility in San Miguel, this impact would remain significant and adverse. In addition, because the proposed project would contribute to an existing deficiency in library space, and there is no expansion or new library planned at this time, the project's cumulative contribution to impacts to the County library system deficiency is also considered to be a significant unavoidable adverse impact.

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