



July 25, 2017

Shawna Scott, Associate Planner
City of San Luis Obispo
Community Development
919 Palm St., San Luis Obispo CA 93401

Dear Ms. Scott,

We are in receipt of your July 10 letter requesting comment on the Notice of Preparation of an Environmental Impact Report for the Froom Ranch Specific Plan Project.

The Sierra Club has three primary concerns with this project: Its proposed development beyond the Urban Reserve Line, the definition of Project objectives, and the inclusion of a full analysis of the Project's potential cumulative impacts in the EIR.

We appreciate that the City has shown awareness of the first concern in the NOP's discussion of the potential impacts of the request by the applicant for a General Plan Amendment to allow for hillside development above the 150-foot level, and the City's stated intent to include a project alternative that locates all development below the 150-foot elevation line.

Second, as we pointed out in our comments on the San Luis Ranch Project, when a Specific Plan/General Plan amendment is proposed, the Project objectives should be stated in terms of development options within the range of intensity of the residential and commercial development called out in the Land Use Element, not just the high end of that range. The California Environmental Quality Act does not require analysis of only the project design that will assure the maximum level of residential and commercial development allowed in the General Plan and dismissal of any alternative of reduced scale as infeasible solely because the scale is reduced. We urge the City not to take the position that Project objectives serve as a bar to the analysis of scaled-back alternatives, nor maintain that a Project alternative may not be considered unless it meets all of the Project objectives.

Third, per CEQA Guidelines, the EIR must evaluate "past, present, and reasonably foreseeable future projects," which "when considered together, are considerable or which compound or increase other environmental impacts."

As of July 20, the City's website listed the following reasonably foreseeable future projects:

Projects Currently Posted on SLO City Web Site

Name	Residential Units	Sq. Feet of Commercial/Office	Hotel	Open Space	Other
San Luis Ranch	500	350,000	200	5.8	
Avila Ranch	720	20,000			
Froom Ranch	130	30,000	120	2.9	398 Senior Units
1101 Monterey		27,079			
Marsh & Carmel	8	1,100			
Madonna Plaza		56,257			
San Luis Square	62	19,792	36		
Monterey Place	29	12,255	3		
Vesper Hotel at the Creamery		6,698	47		
Twin Creeks	102	6,566			
Broad St. Collection	10		6		
1185 Monterey	13	2,464			
Bridge Street		21,000			
71 Palomar Av	33				
Wes Creek Development	172				
Ferrini Apartments	5				
22 North Chorro	27	2,000			
Imel Ranch Subdivision	18				
Olive Mixed Use	17	3,500			
Wingate Homes	142	5,000			
Righetti Ranch Subdivision	304				
Digital West		775,000			
Towne Place Suites			114		
French Hospital Expansion					
Motel Inn			55		13 RV spaces and 10 Airstream spaces
The Junction	69	3,000			
Long Bonetti Public Market		47,000			
Jones Subdivision	65	15,000			
Granada Hotel Expansion			22		
Ellsworth Tract					35 Commercial Lots
Aerovista Place		37,000			
South Town 18	18	70			
Discovery SLO Bowling		245,000			Reusing existing space
McCarthy Steel		9,840			
The Yard	43				
Bishop Street Studios	34				
Caudill Mixed Use	36	5,500			
Perry Ford		7,895			

Laurel Lane Mixed Use	18	2,500			
Poly Performance		30,000			
Tank Farm Commerce Park		29,000			
Broad Street Mixed Use	11	3,000			
Shell Station Development		10,000			
Higuera Brew		15,500			Reusing existing space
Iron Works	46	4,400			
Monterey Hotel			102		
Homeless Service Center		20,000			
Toscana Moresco	161				
BMW Dealership		23,945			
625 Toro	14				
Serra Meadows	247				
Aerovista Office		37,000			
Hotel Serra	8	25,000	64		
Brownstones	8				
Chinatown Hotel	30	25,000	78		
Direct Injectors		6,200			
Airport Business Center		75,000			
SLO Brew Production		31,290			
Avinvo Townhomes	161				
Pacific Courtyards	9	8,000			
Fxlini Tract	13				
Bridge Street	26				
Boysen Apartments	6				
Total	3315	2,054,851	847	8.7	

Compiled by David Blakely

We urge the City to insure that in addition to analyzing and considering mitigations for potential impacts on traffic, greenhouse gas emissions, air quality, biological resources, land use/planning and all other areas identified in the Initial Study as requiring evaluation, the EIR fully analyzes and mitigates the cumulative impacts likely to arise in those categories from all of the above projects and any others that are likely to be developed within the approximate timeframe of the Froom Ranch Specific Plan.

Thank you for inviting us to comment,



Andrew Christie
Chapter Director