



## **Second Addendum to the Final Environmental Impact Report for the Avila Ranch Development Plan**

**1. Project Title:**

Avila Ranch Development Plan

**2. Lead Agency Name and Address:**

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

**3. Contact Person and Phone Number:**

Callie Taylor, Associate Planner  
805-781-7016

**4. Project Location:**

175 Venture Drive  
San Luis Obispo, CA 93401

**5. Project Applicant and Representative Name and address:**

Avila Ranch  
WCP Developers, LLC  
Dan Garson, Director of Land Development  
735 Tank Farm Rd Suite 100, San Luis Obispo, CA 93401

**6. General Plan Designation:**

Special Focus Area SP-4. Per Avila Ranch Development Plan: Low-Density Residential, Medium-Density Residential, Medium-High Density Residential, High-Density Residential, Neighborhood Commercial, Open Space, Park

**7. Zoning:**

Per Avila Ranch Development Plan: R-1 Low-Density Residential, R-2 Medium-Density Residential, R-3 Medium-High Density Residential, R-4 High-Density Residential, C-N

Neighborhood Commercial, Conservation/Open Space C/OS, PF Public Facility, Airport Area Specific Plan

**8. Description of the Project:**

The Avila Ranch Development Plan was approved by the San Luis Obispo City Council on September 19, 2017. Project entitlements included certification of the Final EIR, approval of the Avila Ranch Development Plan, Airport Area Specific Plan Amendment, General Plan Amendment, Vesting Tentative Tract Map, Zone Change, Development Agreement, and establishment of a Community Facilities District. The project includes 720 residential units, 15,000 square feet of neighborhood commercial, open space, and parks on a 150-acre area which is to be developed within six (6) phases of development with a phased final map.

**9. Project Entitlements Requested:**

Previously approved by the City Council on September 19, 2017. Project implementation, permits, and construction are in process.

**10. Previous Environmental Review:**

The Avila Ranch Development Plan (ARDP) and associated Final Environmental Impact Report (EIR) were approved and certified by the City Council on September 19, 2017, pursuant to Resolution No. 10832 (2017 Series). The significance of each impact resulting from implementation of the Project was determined based on impact significance criteria and applicable CEQA Guidelines for each impact topic. The EIR found that the Project would result in significant and unavoidable construction-related and long-term impacts to air quality, construction-related noise, and long-term transportation and traffic impacts. Mitigation measures were adopted to reduce the potential impacts where feasible, and the City Council adopted CEQA findings and a Statement of Overriding Conditions to address the identified significant and unavoidable impacts described in the Final EIR.

An Addendum to the Final EIR ("First Addendum") was prepared in January 2024 to address a change in timing of the implementation of Mitigation Measure TRANS-11, which established an obligation for the project to install two separated bicycle bridges on each side of Buckley Road at Tank Farm Creek to improve access to safe bicycle routing along Buckley Road. The City Council approved that Addendum on January 23, 2024.

Buildout of the project is currently underway. The Phase 1 Final Map was recorded in December 2018, and the Phase 1 residential units are currently under construction. On- and off-site improvements have been constructed as part of Phase 1, including transportation improvements to mitigate for the increase in traffic generated by the Tract 3096 development.

## **11. Purpose of the Second Addendum:**

Section 15164 of the State *CEQA Guidelines* allows a lead agency to prepare an addendum to a Final EIR when only “minor technical changes or additions” are necessary to address the effects of a minor change to the approved project since the Final EIR was certified. In addition, the lead agency is required to explain its decision not to prepare a subsequent EIR pursuant to State CEQA Guidelines Section 15162, which requires subsequent EIRs when proposed changes would require major revisions to the previous EIR “due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.”

Subsequent to certification of the ARDP Final EIR, additional information has been identified which would apply a density bonus to the R-4 portion of the Avila Ranch project, and would consequently allow for an additional 20 dwelling units to be constructed in that area. This would raise the total potential buildout of the entire Avila Ranch project area from 720 to 740 dwelling units. These additional units were not considered in the original Final EIR. The purpose of this Addendum is to document this change to the original project, and to discuss the potential effects associated with this change, if any. The Second Addendum concludes that this change would not result in any new or more severe significant environmental effects not previously analyzed in the Final EIR, nor any new or modified mitigation measures. The evaluation below discusses the issue areas that are relevant to this Addendum and covered by the previously approved Final EIR.

## **12. Addendum Requirements:**

Pursuant to Section 21166 of CEQA and Section 15162 of the State CEQA Guidelines, when a lead agency has adopted an EIR for a project, a subsequent EIR does not need to be prepared for the project unless the lead agency determines that one or more of the following conditions are met:

1. Substantial project changes are proposed that will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
2. Substantial changes would occur with respect to the circumstances under which the project is undertaken that require major revisions to the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
3. New information of substantial importance that was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was adopted shows any of the following:
  - a. The project will have one or more significant effects not discussed in the previous EIR; or

- b. Significant effects previously examined will be substantially more severe than identified in the previous EIR; or
- c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponent declines to adopt the mitigation measures or alternatives; or
- d. Mitigation measures or alternatives that are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponent declines to adopt the mitigation measures or alternatives.

Preparation of an Addendum to an EIR is appropriate when none of the conditions specified in Section 15162 (above) are present and some minor technical changes to the previously certified EIR are necessary to address minor changes to an approved project. Because the new information would not result in any new or more severe significant impacts, an Addendum is the appropriate CEQA document.

## **NEW INFORMATION AND UPDATED PROJECT ELEMENTS**

### **NEW INFORMATION NOT CONSIDERED IN THE FINAL EIR**

As originally approved in 2017, the Avila Ranch Development Plan allowed up to 720 dwelling units, including 125 units within the R-4 portion of the plan area. The 150-acre plan area was to be developed in phases, with the design of each project component within the plan area to be reviewed by the Planning Commission. The R-1 and R-2 portions of the project, for example, have been previously reviewed by the Planning Commission, were found consistent with the parameters of the ARDP, and are currently under construction. Now the 4.05-acre R-4 (multi-family) portion of the ARDP is undergoing a similar review. In this case, the developer is seeking an allowable density bonus that would increase the development potential of that area from 125 to 145 units. These additional 20 dwelling units were not considered in the Final EIR for the Avila Ranch Development Plan in 2017, and are thus the subject of this Addendum.

### **CHANGED BASELINE CONDITIONS AND UPDATED PROJECT ELEMENTS**

This Addendum considers the potential effects of increasing the overall buildout potential of the ARDP from 720 to 740 units, as a result of applying a density bonus to the R-4 portion of the plan area that would increase the development potential in that area from 125 to 145 units. The location of these 20 additional units would not change from the area where R-4 development had been previously anticipated in the FEIR, nor would any other project elements, including roadways, backbone infrastructure, or other public improvements identified in the ARDP. This increase in development potential would not alter the substance or timing of any existing project conditions or mitigation measures associated with the original project approval. This proposed

action would not alter any portion of the ARDP that was intended to be left in open space or agriculture under the original 2017 approval.

The proposed increase in development potential from 720 to 740 dwelling units represents a 2.8% overall increase in the total number of residences under the Avila Ranch Development Plan. However, this increased development would still be subject to the City's policies regarding the timing of growth, as well as the constraints of the housing market.

## **MINOR TECHNICAL CHANGES TO THE FINAL EIR**

The proposed project revisions noted above would result in minor changes to the Final EIR and are therefore evaluated in this Addendum in the analysis that follows.

### **Environmental Issues for Consideration**

The proposed change to the project does not anticipate any new development or ground disturbance in any area within the ARDP that was not already evaluated in the Final EIR. For that reason, impacts associated with issues related to ground disturbance will not change from what was described in the FEIR, including agricultural resources, biological resources, cultural resources, hazards, and hydrology/water quality. These issues will not be analyzed further in this Addendum.

Other impacts that are driven by an increase in the number of residents anticipated in the area are discussed in the paragraphs that follow. These include the issues of air quality and greenhouse gas emissions, noise, population and housing, public services, transportation and traffic, and utilities.

### **Analysis**

For all issues, there were no new significant impacts, no increase in the severity of a previously identified significant impact, nor any new or modified mitigation measures required. The following analysis of each issue discusses this in more detail, and provides support for this conclusion.

Air Quality and Greenhouse Gas Emissions. The FEIR identified the following significant impacts that could be affected by an increase in population or housing:

- AQ-1. Construction-related air quality impacts.
- AQ-2. Long-Term air quality impacts.
- AQ-4. Greenhouse Gas Emissions.
- AQ-5. Inconsistency with Clean Air Plan.

With respect to Impacts AQ-1 and AQ-2, both construction and operational air quality impacts were found to be significant and unavoidable. A series of programmatic mitigation measures were proposed to address impacts related to all future development in the area, either in terms

of construction practices or project design. The proposed project modification would increase buildout within the area by 20 dwelling units, a 2.8% increase in residential development potential within the ARDP. This minor increase would not change the severity of the identified impacts, nor any mitigation measures to address those impacts, which would still remain significant and unavoidable.

In the FEIR, impacts related to greenhouse gas emissions (Impact AQ-4) were found to be significant but mitigable. The minor increase in housing would not change this conclusion, nor would it change the programmatic mitigation measures related to reducing emissions, nor any of the measures related to requiring alternative forms of transportation, such as bicycle and pedestrian facilities.

With respect to Clean Air Plan consistency (Impact AQ-5), the FEIR determined that impacts are potentially significant and unavoidable, but mitigation measures related to air quality and transit were required. These conclusions would still be true with the minor increase in housing development within the ARDP.

Also refer to the discussion of transportation/traffic for additional information related to that issue, which tangentially relates to air quality impacts.

Noise. The FEIR identified the following significant impacts that could be affected by an increase in population or housing:

- NO-1. Construction noise impacts.
- NO-3. Noise generation from increased traffic.

Construction-related noise (Impact NO-1) was determined to be significant and unavoidable, although a series of programmatic mitigation measures were required to reduce the severity of possible impacts, which included limiting construction hours and the use of noise attenuation measures at construction sites. After all construction is completed, this impact would cease. The incremental increase in development would not increase the severity of this impact, nor would it alter any of the required mitigation measures.

Long-term noise impacts (Impact NO-3) are primarily a function of increased traffic, and were determined to be significant but mitigable to future project residents. No offsite impacts were identified. Mitigation measures related to individual project design were required to reduce impacts to project residents. The incremental increase in development would not alter these conclusions. Also refer to the discussion of transportation/traffic for additional information related to that issue, which tangentially relates to noise impacts.

Population and Housing. The FEIR did not identify any significant impacts related to this issue. Its conclusion that development will occur within the City's adopted growth rate (Impact PH-1) is still true for the proposed project modification, because development would still be subject to the City's policies related to growth, and subject to market constraints, as it is part of a long-term phased buildout of the ARDP. As a project that provides housing, other impacts related to

improving jobs-housing balance and the provision of affordable housing were found to be beneficial. Increased housing opportunities would tend to reinforce these conclusions.

Public Services. The FEIR did not identify any significant impacts related to this issue. Increased demand for police and fire services (Impacts PS-1 and PS-2) were found to be significant but mitigable with the payment of required fees to offset potential impacts, and in the case of impacts to law enforcement, the creation of a Security Plan for the ARDP. The small increase in development potential would still be subject to the same mitigation requirements. No increase in severity of impacts or new mitigation measures would be required.

Impacts related to schools and public parks (Impacts PS-3 and PS-4) were found to be less than significant, and with an incremental increase in population from these 20 additional units, impacts would remain less than significant.

Transportation and Traffic. The FEIR identified the following significant transportation impacts that could be affected by an increase in population or housing:

- TRANS-1. Short-term construction traffic.
- TRANS-2. Transportation deficiencies.
- TRANS-3. Turning movement conflicts and intersections and driveways.
- TRANS-4. Transportation volume threshold exceedances on certain roads.
- TRANS-5. Buckley/227 Operation.
- TRANS-6. South Street/Higuera impacts.
- TRANS-7. S. Higuera intersections impacts.
- TRANS-8. LOVR intersections.
- TRANS-10. Pedestrian level of service.
- TRANS-11. Bicycle facility demand.
- TRANS-12. Transit demand.
- TRANS-13. Near-term Buckley/227 Operation.
- TRANS-14. Near-term bike and pedestrian facility demand.
- TRANS-15. Cumulative impacts to intersections.

Some of these impacts were found to be significant and unavoidable, including those related to the operation of the intersection of Buckley Road/SR 227 (Impacts TRANS-5 and TRANS-13). All other impacts were all found to be significant but mitigable, either through the payment of appropriate fees toward future improvements, or by making some of those roadway improvements directly as requirements of project approval. These improvements are programmed into the approved Development Agreement for the project. The impact to operations on US 101 (Impact TRANS-9) was found to be less than significant.

The incremental increase in development would not change any of the conclusions or required mitigation measures described in the FEIR. Please refer to the attached October 2023 memorandum prepared by Central Coast Transportation Consulting and reviewed by City staff for more information about trip generation and related potential effects from these additional 20 units not addressed in the FEIR. That memorandum concludes that no new impacts would occur, nor would any new or modified mitigation measures be required.

Utilities. The FEIR did not identify any significant impacts related to this issue. Increased demand for utility infrastructure (Impact UT-2) was found to be significant but mitigable with a variety of mitigation measures to offset potential impacts, including city review and approval of infrastructure plans. The small increase in development potential would still be subject to the same mitigation requirements. No increase in severity of impacts or new mitigation measures would be required.

Impacts related wastewater collection (Impact UT-1) were found to be less than significant, and with an incremental increase in population from these 20 additional units, impacts would remain less than significant.

## **DETERMINATION**

In accordance with Section 15164 of the State CEQA Guidelines, the City of San Luis Obispo has determined that this Addendum to the certified Final EIR is necessary to document changes or additions that have occurred since the Final EIR was originally certified. The changes proposed are relatively minor in nature and, as documented above, would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects. Additionally, no new information of substantial importance that was not known and could not have been known with the exercise of reasonable diligence at the time the previous Final EIR was adopted has been identified.

The preparation of a subsequent environmental document is not necessary because:

1. None of the circumstances included in Section 15162 of the CEQA Guidelines have occurred which require a subsequent environmental document:
  - a. The project changes do not result in new or substantially more severe environmental impacts.
  - b. The circumstances under which the project is undertaken will not require major changes to the IS/MND.
  - c. The modified project does not require any substantive changes to previously approved mitigation measures.
2. The changes are consistent with City General Plan goals and polices that promote provision of additional housing within the City.

The City has reviewed and considered the information contained in this Addendum and finds that the preparation of subsequent CEQA analysis that would require public circulation is not necessary. This Addendum does not require circulation because it does not provide significant new information that changes the adopted Final EIR in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect. The City shall consider this



Addendum with the certified Final EIR as part of the basis for potential approval of on- and off-site subdivision improvements for the Avila Ranch Project.

Attachment: Avila Ranch Transportation Analysis, October 19, 2023