

Addendum #2 to the Final  
Environmental Impact Report for the  
San Luis Ranch Specific Plan, San  
Luis Obispo, California

JULY 2021

PREPARED FOR  
**City of San Luis Obispo**

PREPARED BY  
**SWCA Environmental Consultants**



**ADDENDUM #2 TO THE FINAL ENVIRONMENTAL IMPACT  
REPORT FOR THE SAN LUIS RANCH SPECIFIC PLAN, SAN  
LUIS OBISPO, CALIFORNIA**

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## INTRODUCTION AND PURPOSE OF THE ADDENDUM

On July 18, 2017, the City of San Luis Obispo (City) adopted a Final Environmental Impact Report (FEIR; SCH #2015101083) for the proposed San Luis Ranch Specific Plan (San Luis Ranch Project) and approved the requested project entitlements, including a proposed Specific Plan, General Plan Amendment/Pre-zoning, Development Plan/Vesting Tentative Tract Map, and application for annexation of the site into the city of San Luis Obispo. The project also included a Development Agreement/Memorandum of Understanding to provide a mechanism for project implementation. The project includes a mixture of residential, commercial, office, hotel, and agriculture and open space land uses on a 131-acre parcel. The Specific Plan area would be organized into six proposed zones which include Neighborhood General 1 (NG-10), Neighborhood General 2 (NG-23), Neighborhood General 3 (NG-30), Neighborhood Commercial (NC), Parks and Open Space (P-OS), and Agriculture (A). Prior to future buildout, grading permits, building permits, and further architectural review of future development within the Specific Plan area would be required.

The 1<sup>st</sup> Addendum to the San Luis Ranch FEIR was prepared in June of 2018 with the purpose of addressing an updated traffic analysis prepared for the project. The 1<sup>st</sup> Addendum documented the conclusions of the updated traffic analysis, which determined that the proposed changes to the phasing of traffic improvements would not result in any changes to impact determinations or mitigation measures identified in the adopted FEIR.

Subsequent to certification of the FEIR and preparation of the 1<sup>st</sup> Addendum, additional information regarding the 16<sup>th</sup> District Agricultural Association racetrack grandstand (grandstand, also referred to as the spectator's barn/viewing stand) has been identified that altered the previous eligibility findings of the resource as described in the adopted FEIR. The purpose of this 2<sup>nd</sup> Addendum is to document the revised status of the grandstand and associated racetrack and to confirm the change of mitigation strategy for the grandstand would not result in any new or more severe significant environmental effects not previously analyzed in the FEIR.

## 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;

- b. Significant effects previously examined will be substantially more severe than identified in the previous EIR;
- 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 adopted EIR are necessary. 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**

### **1.1 NEWLY DISCOVERED INFORMATION**

As described in Section 4.5, *Cultural Resources*, of the FEIR, the spectator's barn/viewing stand (grandstand) was identified as eligible for listing in the National Register of Historic Places, at the local level of significance, as a contributing resource (modified barn) associated with the San Luis Ranch Complex on site. Further evaluation of the resource in 2018 identified additional information that altered the previous eligibility findings that had been developed in connection with the FEIR.

The "spectator's barn/viewing shed," used since c1900 as a storage barn, was found to have significant historical links to the beginnings of the San Luis Obispo County Mid-State Fair; was also found to be the earliest surviving building constructed with funding from the State of California's 16th District Agricultural Association; and was identified as a rare building type – a late 19th-century grandstand associated with a horseracing track. The grandstand was constructed in 1887 and remained in use for the annual 16th District Agricultural Fair until 1900 when the new property owner, William Wood, plowed up the race track to plant barley and moved the grandstand on log rollers to the west side of the parcel, where the Wood residence and barn were also located.

The 2018 evaluation determined that the 1887 grandstand extant on the San Luis Ranch property is a significant historic property eligible for listing on the National Register of Historic Places under Criterion A, at the state and local levels, for its association with the 16th District Agricultural Association and for its role in the development of San Luis Obispo county fair. Further evaluation also determined the grandstand was eligible for listing under Criterion C, at the state and local levels, as a rare surviving example of a scarce resource type – a nineteenth century racetrack grandstand.

As a result of this revised finding of significance and a revised period of significance, the treatment plan for the grandstand was proposed to be modified to better demonstrate its connection to its racetrack origins and to its revised period of significance (1887-1900), when it was an important, prominent, and architecturally distinctive element of the racetrack grounds at the county fair.

## 1.2 CHANGED BASELINE CONDITIONS AND UPDATED PROJECT ELEMENTS

The revised finding and the revised period of significance of the grandstand are proposed to supersede the finding and period of significance stated in the 2017 Environmental Impact Report and are therefore being evaluated in this 2<sup>nd</sup> Addendum.

The project originally proposed the adaptive reuse and relocation of the existing main residence and the grandstand to new locations on the site within the Agricultural Heritage Center and proposed demolition or off-site relocation of the remaining structures including the main barn. The following mitigation measure was adopted in the 2017 FEIR to reduce impacts to identified historical resources to the greatest extent feasible:

**CR-1(a) Historical Structure Relocation and Reconstruction Plan.** In order to implement Specific Plan Policy 2.5, a relocation and reconstruction plan for the former spectator's barn/viewing stand, main residence, and main barn shall be developed by a qualified historic architect. The plans shall include a structural/architectural report documenting existing integrity and conditions and include detailed treatment methods and measures to ensure that historic integrity is retained and that all identified character-defining features will be preserved.

In February 2019, a human-caused fire destroyed most of the grandstand. As a result, only the lower portion of the north wall remains, and the entirety of the grandstand is no longer able to be restored and relocated and reused within the proposed Agricultural Heritage Center as envisioned in the 2017 EIR and CR-1(a). As a result of this newly discovered information and the change in conditions described above, the proposed treatment plan for the grandstand has been modified to better demonstrate the grandstand's connection to the origins of the racetrack and its time period of significance (1887 to 1900) and to recognize that only a small portion (a portion of the north wall) of the resource currently remains.

## MINOR TECHNICAL CHANGES TO THE FEIR

The project revisions noted above would result in minor changes to the proposed project and FEIR and are therefore evaluated in this 2<sup>nd</sup> Addendum, below.

**Aesthetic Resources.** Mitigation Measure CR-1(a) includes preservation of the remaining grandstand wall in the Agricultural Heritage Center, which would be located along the southeast side of Froom Ranch Way, directly southwest of the proposed commercial land use. The Agricultural Heritage and Learning Center would be visually compatible with design and other features of the Specific Plan. As a result, preservation of the grandstand wall within the Agricultural Heritage Center would not block or alter key views of the area beyond what was previously analyzed in the adopted FEIR based on consistency with design, height, lighting, and other features of the Specific Plan. Therefore, no new or more severe impacts would occur beyond what was previously analyzed in the FEIR.

**Agricultural Resources.** The FEIR determined that impacts to Agricultural Resources would be less than significant with adopted mitigation measures, including requirements for conservation easements, fencing, agricultural buffers, and other avoidance measures. Pursuant to Mitigation Measure CR-1(a), the Agricultural Heritage Center would include preservation of the remaining grandstand wall in the Agricultural Heritage Center, which would be located within the proposed Agriculture land use designation, adjacent to the proposed Neighborhood Commercial land use designation. Preservation of the

remaining grandstand wall would not result in interference with agricultural operations because it would be subject to adopted agricultural mitigation measures for preserving agricultural resources within the project area. In addition, preservation of the grandstand wall within the Agricultural Heritage Center would be beneficial to preserving the agricultural heritage of the site because it would be an interpretive element of City's past agricultural setting and history. Therefore, no new or more severe impacts would occur beyond what was previously analyzed in the FEIR.

**Cultural Resources, Threshold (a).** The FEIR determined that impacts to Historical Resources are significant and unavoidable; however, implementation of Mitigation Measure CR-1(a) would reduce impacts to the greatest extent feasible by retaining the individual integrity and character-defining features of the main residence, main barn, and grandstand. The changed baseline condition of the grandstand would not change this determination. However, the remaining wall of the grandstand will be treated differently through the implementation of CR-1(a), as the grandstand is now known to be a significant resource for its connection to the 16th District Agricultural Association rather than its connection to the San Luis Ranch Complex.

Although most of the grandstand was destroyed in the 2019 fire, there is still a considerable amount of integrity retained in the remaining wall. The project now proposes to stabilize the remaining wall and display it in the Agricultural Heritage Center.

Mitigation Measure CR-1(a) would be consistent with the SOI Guidelines for the Rehabilitation and Preservation of historic buildings and would be consistent with the adopted environmental determination of the San Luis Ranch FEIR. With implementation of Mitigation Measure CR-1(a), the project would continue to reduce impacts to the greatest extent feasible. Therefore, no new or more severe impacts would occur beyond what was previously analyzed in the FEIR.

Implementation of Mitigation Measure CR-1(a) would not change the environmental determination of the identified or other resource sections in the FEIR. Therefore, no new or more severe impacts would occur beyond what was previously analyzed in the FEIR.

## **DETERMINATION**

In accordance with Section 15164 of the State CEQA Guidelines, the City of San Luis Obispo has determined that this Addendum to the adopted FEIR is necessary to document changes or additions that have occurred since the FEIR 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 FEIR was adopted has been identified. 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 FEIR 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 adopted FEIR as part of the basis for potential approval of the Agricultural Heritage portion of the San Luis Ranch Project.