

SAN LUIS OBISPO COUNTY AIRPORT LAND USE COMMISSION

DATE: FEBRUARY 19, 2025

TO: AIRPORT LAND USE COMMISSION (ALUC)

**FROM: ERIC TOLLE, STAFF ALUC LIAISON
COUNTY OF SLO DEPARTMENT OF PLANNING AND BUILDING**

**REFERRING AGENCY: CITY OF SAN LUIS OBISPO
PROJECT MANAGER: JOHN RICKENBACH**

SUBJECT: A MANDATORY REFERRAL BY THE CITY OF SAN LUIS OBISPO (CITY) FOR A DETERMINATION OF CONSISTENCY OR INCONSISTENCY WITH THE AIRPORT LAND USE PLAN (ALUP) FOR THE SAN LUIS OBISPO COUNTY REGIONAL AIRPORT (AIRPORT) FOR A PROPOSED AMENDMENT TO THE CITY'S AIRPORT AREA SPECIFIC PLAN (AASP)

RECOMMENDATION

Staff recommends that the ALUC determine that the proposed AASP Amendment is consistent with the ALUP based on the findings and subject to the conditions of consistency (**Attachment 1**).

BACKGROUND

City of San Luis Obispo AASP

In recent years, the demand for housing in general, and affordable housing in particular, has risen dramatically in San Luis Obispo, as it has elsewhere. In response, the City's 2014 General Plan Land Use Element update reflects this increased demand, and includes several large areas for increased residential development. At the same time, the City has tried to address these issues by supporting mixed-use development, in Service Commercial (C-S) or Manufacturing (M) designated land by right outside of specific plan areas.

The AASP provides a regulatory framework for planning future development on about 1,200 acres in the southern portion of the City near the San Luis Obispo County Regional Airport. The AASP does not currently allow mixed-use development, because when it was adopted in 2005, it was subject to the 2002 San Luis Obispo County Regional Airport's ALUP that limited residential and non-residential development. In 2021, the ALUP was amended to address new technical information related to safety and noise, which resulted in a refinement of areas subject to land use restrictions, including areas within the AASP. As a result, there is now substantial area within the AASP where the land use restrictions have changed creating opportunities for mixed-use developments.

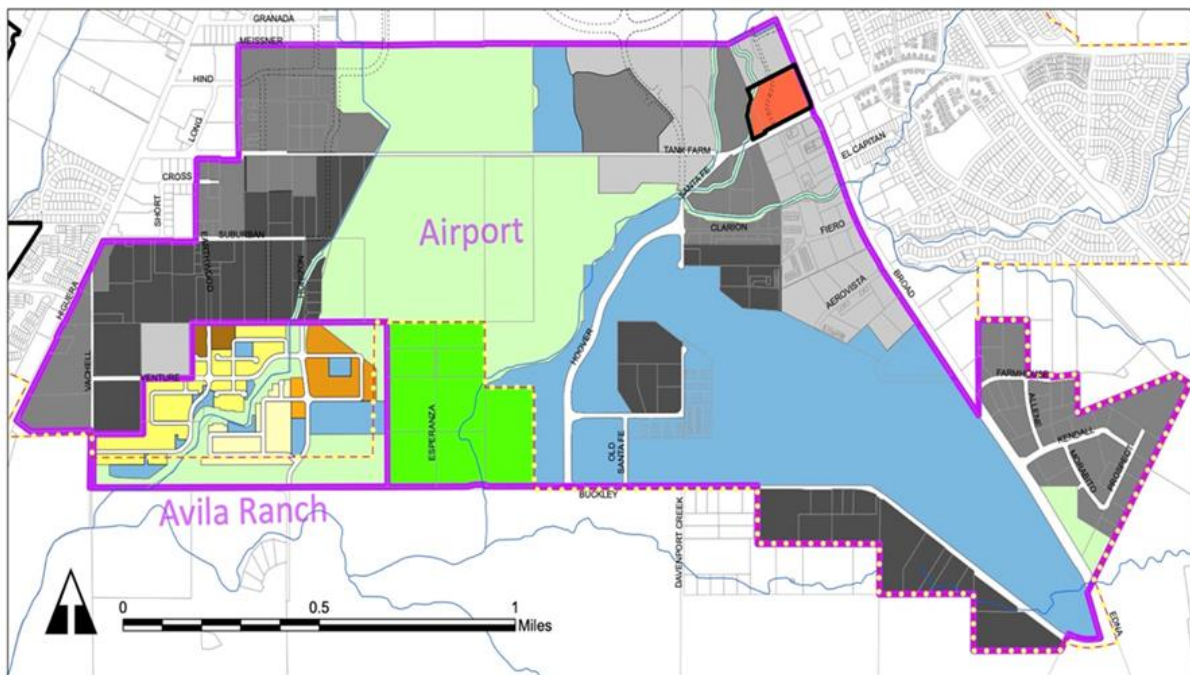
The proposed action responds to the changes in the ALUP and increased housing demand in an evolving market by amending the AASP to allow for mixed-use development (as defined in the City's Municipal Code) with a conditional use permit (CUP) within parcels zoned either Service Commercial (C-S) or Manufacturing (M), subject to making certain findings described later in this report.

San Luis Obispo County Regional Airport ALUP

The ALUP for the Airport was initially adopted by the ALUC in December 1973. The plan was subsequently amended and restated in June 2002, July 2004, and May 2005. The current ALUP, amended and reinstated May 26, 2021, was recently updated by the ALUC to reflect current state law and the guidance of the 2011 California Airport Land Use Planning Handbook revisions, and to reflect updates since 2004 to the airport layout plan, aviation activity forecasts, and noise contour maps.

DISCUSSION

County staff received the initial referral packet from the City on December 04, 2024. Under Public Resources Code Section 21676(d), the ALUC must determine whether the Amendments are consistent or inconsistent with the ALUP within sixty days after the date on which all required information was received from the referring agency in order to avoid a default consistency determination (absent an extension or waiver of the statutory deadline by the referring agency). The project and applicant appeared before the ALUC for a conceptual discussion of the project on January 15, 2025. The City provided the additional information requested by the ALUC and on January 28, 2025, staff determined that all required information was included with the ALUP amendment application materials and the project was accepted for processing by staff.



- | | | |
|---------------------------------------|--------------------------------|-------------------------|
| Low Density Residential (R-1) | Neighborhood Commercial (C-N) | Proposed Road |
| Medium Density Residential (R-2) | Community Commercial (C-C) | Creeks |
| Medium-High Density Residential (R-3) | Service Commercial (C-S) | Urban Reserve Line |
| High Density Residential (R-4) | Manufacturing (M) | Special Focus Area (SF) |
| Agriculture (AG) | Public Facility (PF) | |
| Business Park (BP) | Conservation Open Space (C/OS) | |

Figure 1: Existing Land Use Designations in the Airport Area Specific Plan

AASP AMENDMENT COMPONENTS

The Project Area includes all parcels designated as Service Commercial (C-S) or Manufacturing (M) within the 1,200-acre AASP planning area. Figure 1 above shows the location of C-S and M designated parcels within the AASP.

A land use inventory was prepared in 2024 to determine the amount of C-S or M designated lands within the AASP. Table 1 below summarizes the total acreage of vacant and developed parcels in these two land use designations.

Table 1. Summary of Land Use Inventory C-S and M Parcels in the AASP			
Land Use Designation	<i>Acreage</i>		
	Developed (or entitled)	Vacant	Total
Service Commercial (C-S)	140.4	85.6	226.0
Manufacturing (M)	94.7	20.4	115.1
Total	235.1	106.0	341.1

Attachment 2 provides a complete inventory of all parcels within the AASP that are in either the C-S or M land use designations. **Attachment 3** shows the ALUP safety zones as they overlay the AASP, and specifically how they relate to the C-S and M zones. **Attachment 4** shows how the ALUP noise contours overlay the AASP.

PROPOSED AASP FINDINGS

The City is proposing to amend the AASP to allow mixed-use development within Manufacturing (M) or Service Commercial (C-S) zoned parcels with the approval of a Conditional Use Permit (CUP). No development would occur directly as a result of this action. No existing zoning or land use designations are proposed to change. Instead, the resulting amendment would allow mixed-use development, subject to specific findings, and consistent with the requirements of the City's Zoning Regulations, as they currently apply to C-S and M designated lands in the remainder of the City.

The specific findings necessary for the City of San Luis Obispo's Planning Commission to make in order to approve a conditional use permit for an individual mixed-use project in the AASP would be:

- 1. There is demonstrable water and sewer capacity to serve the project;**
- 2. Any fiscal impact of the project to the City must be offset to achieve fiscal neutrality;**
- 3. There are no nearby uses that generate sufficient air emissions, noise, odors or vibration to create an incompatibility with proposed mixed-use development;**
- 4. Proposed mixed-use development is consistent with land use, safety or noise restrictions set forth in the ALUP; and**
- 5. There is adequate emergency response.**

Future development under the modified land use requirements could occur as a result of individual project applications that must be approved by the City of San Luis Obispo through its normal development and conditional use permit review processes, and subject to environmental review under the California Environmental Quality Act (CEQA). However, the magnitude and timing of such development is speculative at this time, and would be influenced by a variety of issues, including market demand, property owner desire to develop, consistency with the ALUP, and potential environmental constraints that may apply to specific parcels where project development applications are under consideration.

PROPOSED AASP TEXT CHANGES

Proposed text modifications to the Airport Area Specific Plan are described below. The existing AASP is included as **Attachment 5** (link only, see Page 14).

Chapter 1—Introduction

Page 1-3. Environmental Review. Add short paragraph following the first paragraph on the page describing the CEQA review that was conducted for this specific plan amendment.

Page 1-7. The Planning Process. Add a new paragraph at the end of this section that describes the current planning effort, specifically that residential uses will be permitted as part of mixed use projects in the Manufacturing (M) and Service Commercial (C-S) Zones subject to the design and development conditions included in the policy framework of the AASP. The intent is to recognize the greater extent of developable area and uses that would be allowed under the updated 2021 Airport Land Use Plan (ALUP), subject to design and density requirements in the ALUP.

Chapter 2—The Planning Area

No changes proposed.

Chapter 3—Conservation and Resource Management

Page 3-12. Aircraft Operations. Add the following to the end of this section:

"The Airport Land Use Commission adopted a major amendment to the Airport Land Use Plan on May 26, 2021. The amended ALUP provides for noise contours that are tied to aircraft and airport activity that is based on adopted federal Terminal Area Forecasts, and on safety zones that are based on and consistent with those described in the Caltrans Airport Land Use Planning Handbook. These revised safety areas and noise contours have the general effect of opening certain areas to higher density development within portions of the AASP."

Chapter 4—Land Use

Page 4-2. Land Use Background. Modify the third complete paragraph on Page 4-2 as follows:

~~"The land use plan was developed to ensure compatibility with airport operations. Uses that have high concentrations of people or are sensitive to airport noise (e.g., low density residential, schools, hospitals, etc.) are not included in the planning area. The designated AASP land uses (Figure 4-1) are consistent with the airport safety areas in the San Luis Obispo County Regional Airport Land Use Plan (ALUP), as amended in 2021. Generally, the critical areas in line with the runway centerlines will be maintained as open space. Lower intensity warehousing, manufacturing, service, business park and mixed-use development are designated for the less sensitive zones to the sides of the runways, and further out from the ends of the runways."~~

Pages 4-2 and 4-3. Table 4-1, Airport Area Specific Plan Land Use Program and Development Capacities. Remove Table 4-1 and all references to Table 4-1 in the text of the Specific Plan, as it is currently out of date, reflects buildout potential based on assumptions made when the specific plan was first adopted 20 years ago, does not aid in implementing the specific plan, and with less interest in purely commercial development and the ability to pursue mixed-use development, any estimate of potential buildout within the area is likely to be inaccurate. Instead, add a note in this section that includes the following:

"Market factors, environmental constraints, and parcel size and configuration will ultimately determine the mixed-use development potential (and timing of that development) within areas where it is permitted with approval of a conditional use permit."

Table 4-1 as proposed for removal is shown below:

Residential Land Use	Acres	Units Per Acre	Estimated Dwelling Units
Undeveloped Land¹			
Low Density	12.8	7.9	101
Medium Density	20.5	10.9	223
Medium-High Density	15.2	21.2	322
Subtotal	48.5		720
Developed Land (Existing Mobile Homes)	6.7	4.8	32
Total Residential Property	55.2		678
Non-Residential Land Use Designations	Acres	Floor Area	Estimated Building
Undeveloped Land			
Neighborhood Commercial	8.4	0.31	115,000
Community Commercial	9.66	0.44	185,147
Business Park	116.94	0.21	1,018,781
Service Commercial	155.0	0.24	1,620,432
Manufacturing	101.3	0.17	747,642
Subtotal	384.4		3,687,002
Developed Land	145.2	0.28	1,786,745
Total Non-Residential Property	529.6		5,437,474
Other Land Use Designations	Acres		
Agriculture	76.1		
Conservation / Open Space/Parks	294.9		
Government	292.5		
Total Other Property	663.5		
Total AASP Acreage²	1,255.1		

¹ The total potential square footage (and associated acreage) includes future development on properties currently under pre-annexation agreements and properties outside of the City's jurisdiction with alternative fee programs. Since these properties may not be required to pay their fair share of infrastructure costs, the difference will need to be funded by other funding sources (e.g., grants, additional City contributions, etc.).

² Excludes acreage associated with roads, setbacks, creeks, and other features.

Page 4-23. Table 4-3. Allowed Uses. Amend Table 4-3 to include a line item for Mixed-Use, indicating that it is allowed with a Conditional Use Permit. Add the following note (# 9) at the end of the table that refers to the development standards and findings for mixed-use development within the C-S and M zones. Specific proposed changes to Table 4-3 are shown below as underlined text:

Table 4-3 – Allowed Uses

Key: A = Allowed D = Allowed by Administrative Use Permit PC = Allowed by Planning Commission Use Permit

Land Use	Zoning District			
	PF	C-S	M	BP
MIXED-USE (<i>also see Footnote 9</i>)		<u>PC</u>	<u>PC</u>	

Footnote:

9. In order to approve a Conditional Use Permit (noted as PC in Table 4-3) for a mixed-use development in the C-S and M zones, the Planning Commission shall find the project consistent with development standards outlined in San Luis Obispo Municipal Code Section 17.70.130 (Mixed-use development) and make the following findings:

1. There is demonstrable water and sewer capacity to serve the project;
2. Any fiscal impact of the project to the City must be offset to achieve fiscal neutrality;
3. There are no nearby uses that generate sufficient air emissions, noise, odors or vibration to create an incompatibility with proposed mixed-use development;
4. Proposed mixed-use development is consistent with land use, safety or noise restrictions set forth in the ALUP; and
5. There is adequate emergency response.

Page 4-28. Table 4-5. Building Intensity and Coverage Standards. Amend Table 4-5 to indicate a maximum Floor Area Ratio (FAR) of 1.5 for the C-S and M zones for mixed use development in those zones, in order to be consistent with the maximum FAR in C-S and M zones elsewhere in the City. Specific changes are shown below in underline text.

Table 4-5 San Luis Obispo Airport Area Specific Plan BUILDING INTENSITY AND COVERAGE STANDARDS			
Also See Table 4-6. Limitations on employee and customer concentrations due to airport safety are more restrictive than the standards provided below in most cases and may reduce maximum potential FAR.			
Design Standard	Land Use Designation		
	Business Park	Service Commercial	Manufacturing
<u>Maximum floor area ratio: mixed-use development</u>	<u>n/a</u>	<u>1.5</u>	<u>1.5</u>

Page 4-29. Table 4-7. Setback Standards. Add note to this table that setback standards for the residential component of mixed-use projects in the C-S and M zones must be consistent with the setback standards as set forth in Sections 17.36 or 17.40 of the Zoning Regulations, depending on whether the site is in the C-S or M zone.

Page 4-30. Table 4-8. Parking Standards. Add note to this table that parking standards for the residential component of mixed-use projects in the C-S and M zones must be consistent with the parking standards for residential uses as set forth in Section 17.72 of the Zoning Regulations.

Page 4-30. Table 4-9. Building Heights. Add note to this table that building height standards for the residential component of mixed-use projects in the C-S and M zones must be consistent with the standards as set forth in Sections 17.36 or 17.40 of the Zoning Regulations, depending on whether the site is in the C-S or M zone.

Chapter 5—Community Design

Page 5-15. Goal 5.4, Guideline I. Modify as follows:

"In R-3 and R-4 zones, as well as in the residential portions of mixed-use projects, parking bays and garages shall be placed adjacent to non-residential uses or adjacent to noise exposure areas to the extent possible to buffer sound impacts."

Page 5-18. Standard 5.6.2. Modify this standard as follows:

"Each commercial, industrial loading, outdoor recycling or waste collection area shall be located on the side of a building opposite from parcel lines or street frontages of any land designated for residential use, or for mixed-use projects, separated or screened from the residential portion of the project to the extent possible."

Page 5-38. Table 5-5. Modify the second column of the table to indicate that residential landscape design standards also apply to mixed use projects.

Chapter 6—Circulation & Transportation

No changes proposed.

Chapter 7—Utilities & Services

No changes proposed.

Chapter 8—Public Facilities Financing

Add a section summarizing an areawide Community Facilities District (CFD) as a feasible approach to achieving fiscal neutrality for future projects within the specific plan area. Note that absent a CFD or similar mechanism, fiscal neutrality would need to be achieved on a project-by-project basis.

Chapter 9—Implementation

Page 9-2. Section 9.4, Architectural Review. Modify this section as follows:

“Consistent with required citywide procedures, commercial, industrial, institutional, mixed-use and multi-family residential construction developments will be subject to architectural review. ~~For projects subject to architectural review, the “minor or incidental” procedure should be used for those projects meeting this Specific Plan’s design standards.”~~”

Page 9-3. Section 9.8, Environmental Review. Add discussion to the end of this paragraph that says that all mixed-use projects within the AASP are subject to project-specific environmental review as applicable under the California Environmental Quality Act (CEQA).

AASP AIRPORT COMPATIBLE OPEN SPACE

- ***Policy 4.3.4 Airport Compatible Open Space:*** *The City will work with property owners to implement and maintain Airport Compatible Open Space (ACOS) within the Airport Area, consistent with an approved ACOS plan, to ensure ongoing compatibility between Specific Plan land uses and airport operations. After revision of the AASP, the ACOS shall be amended to include the open space on Avila Ranch and the Reservation Space.*

Analysis: To some extent, the ALUP bases its density standards on whether or not there is an approved Airport Compatible Open Space (ACOS) plan. However, in the case of Safety Zone 6, there are no differences in these standards for residential density, as described in Table 4-2 of the ALUP, included on page 4-17 of that document. For population intensity, there is a limit of 1,200 persons per acre without an ACOS, but no limit with an approved ACOS. Notably, if a project were built at the City’s maximum density of 24 density units per acre (48 total units that are 500 square feet or less), and assuming 2.5 persons per unit, that suggests a maximum residential intensity of about 120 persons per acre. It is unlikely that any non-residential component of a mixed use project would include more than the remainder allowed without an ACOS, which would be 1,140 persons per acre. The City will work with property owners to maintain an ACOS as appropriate, which would ensure consistency with the ALUP’s standards related to this issue.

ALUP POLICY CONSISTENCY ANALYSIS

The following discussion compares relevant aspects of the ALUP to the proposed amendments of the City’s AASP, for the purpose of evaluating consistency. The analysis included below responds to questions raised by the Airport Land Use Commission in its preliminary review of the project in its January 15, 2025 meeting.

As described below, the proposed changes to the AASP are consistent with the ALUP.

Table 2 compares key standards related to development and density from the AASP to those in the ALUP. As shown in the table, the maximum residential and population densities that would be allowed as part of mixed use development within the C-S and M zones would be substantially less intensive than what could be allowed in Safety Zone 6 under the ALUP, which is the only safety zone where future mixed use development would be considered.

The City recognizes that the density restrictions within the Safety Zones 1 through 5 are such that residential uses that are a part of mixed-use projects would not be allowed within these areas. For this reason, Table 2 does not address the requirements of those safety zones.

Table 2. Comparison of Key Standards of the AASP to the ALUP					
	Zoning Regulations / AASP Regulations		2021 ALUP Safety Zone 6		
	Service Commercial (C-S)	Manufacturing (M)	Residential Density (dwelling units / acre)	Mixed Use Intensity (persons / gross acre)	ALUP Land Use Compatibility Table (ALUP Table 4-5, pg 4-28)
Density	24 density units per acre = maximum of 48 front doors (500 SF units) with an occupancy of 2.5 people per unit that would be 120 persons per acre (in housing)	24 density units per acre = maximum of 48 front doors (500 SF units) with an occupancy of 2.5 people per unit that would be 120 persons per acre (in housing)	No Limit with or without approved ACOS (see ALUP Table 4-2, pg 4-17)	No limit with an approved ACOS (see ALUP Table 4-2, pg 4-17)	Compatible uses include: multi-family dwellings, single family, ADUs, retail sales, offices, bars, taverns, restaurants, hotels, health services (mixed-use is not listed **).
Coverage (includes buildings, driveways and parking)	90% (AASP Table 4-5)	90% (AASP Table 4-5)	100% (See ALUP Table 4-5, pg 4-28)	100%	
Height (occupied portions of a building)	36 feet (AASP Table 4-9)	36 feet (AASP Table 4-9)	409 feet mean sea level (ALUP pg 4-36)	409 feet mean sea level (ALUP pg 4-36)	
Height (non-occupied architectural features)	46 feet (AASP Table 4-9)	46 feet (AASP Table 4-9)	409 feet above mean sea level (ALUP pg 4-36) *	409 feet above mean sea level (ALUP pg 4-36) *	
FAR	1.5 is proposed for mixed use	1.5 is proposed for mixed use	N/A	N/A	
<p>* The typical surface elevation in the AASP ranges between 150 and 200 feet above sea level, so these policies would potentially allow building heights that exceed 200 feet.</p> <p>** Mixed use is defined on page 4-14 of the ALUP: Mixed-use development/ mixed-use land use – projects which consist of and will result in establishment of structures intended and used both for commercial purposes, and for human habitation. A project which includes both commercial and residential components will be considered as a mixed-use development or land use regardless of whether the commercial and residential components are contained within single structures or are separated into individual structures.</p>					

ANALYSIS OF KEY RELEVANT ALUP POLICIES

General Land Use Policies

ALUP policies G-1 through G-4 establish the criteria related to land use to evaluate consistency with the ALUP. This section evaluates the proposed AASP amendment's consistency with each policy, which ***"form the basis from which the ALUC will evaluate proposed land use actions and airport-related actions."***

- **Policy G-1:** *A proposed project or local action will be determined to be inconsistent with the ALUP if the information required for review of the proposed action is not provided by the referring agency.*

Analysis: The City has provided all necessary documentation related to the proposed amendment to the AASP.

- **Policy G-2:** *A proposed project or local action will be determined to be inconsistent with the ALUP if the ALUC finds that the action would present specific incompatibilities to the continued economic vitality and efficient operation of the Airport with respect to safety, noise, overflight or obstacle clearance.*

Analysis: As proposed, the amendments to the AASP do not appear to present any incompatibilities with the continued economic vitality and efficient operation of the Airport with respect to safety, noise, overflight or obstacle clearance based on the Airport's current configuration or forecasts. However, the draft Airport Master Plan pending FAA review includes a proposal to shift Runway 11-29 endpoints 740 feet to the northwest. This could create a potential conflict in the future should development be approved and constructed in the limited areas where a shift in the main runway would cause a change in allowable density limitations and potential increase in incompatible development. The ALUC may want to provide direction to City staff regarding whether courtesy notice is requested for any future development that may be proposed in the affected areas while the Airport Master Plan remains pending before the FAA. Additional discussion is also provided below related to noise.

- **Policy G-3:** *Except as provided in Policy G-4, a proposed project or local action will be determined to be inconsistent with the ALUP if the proposal is not in conformance with all applicable Specific Land Use Policies. In the event that the site affected by a proposed project or local action is located in more than one noise exposure area or aviation safety area, the standards for each such area will be applied separately to the land area lying within each noise or safety zone.*

Analysis: As proposed, the amendment to the AASP conforms with this policy. Crucially, many affected parcels overlay more than one ALUP Safety Zone (see **Attachment 3**) or noise contour (see **Attachment 4**). As clearly described in Policy G-3, *"the standards for each such area will be applied separately to the land area lying within each noise or safety zone."* Thus, if part of a given parcel is overlaid by Safety Zone 6, with the remainder in Safety Zone 4, a mixed-use project would have to apply differing standards to the different portions of the parcel.

- **Policy G-4:** *When the site affected by a proposed project or legislative action is located in more than one noise exposure area or aviation safety area, the ALUC may, at its sole discretion, elect not to apply the requirements of Policy G-3 if:*
 - i. The total gross area(s) within the more restrictive area(s) is two (2) acres or less, and*
 - ii. The land area(s) within the more restrictive area(s) is less than 50% of the total gross land area affected by the referred project or local action.*

In such cases, the ALUC may elect to apply the least-restrictive land use or noise policies to the entire site affected by the project or local action. The ALUC must adopt specific findings that the proposed project or location, so considered would not result in the potential development of land uses incompatible with current or future airport operations.

Analysis: The City is not requesting any deviation from the requirements of Policy G-3, but instead is intending to abide by those requirements as individual development projects are proposed. However, if ALUC is open to considering the flexible standards set forth in Policy G-4 on a project-by-project basis, the City has indicated it would not object.

Noise Policies

As shown in **Attachment 4**, the majority of the C-S and M zones where mixed use would be allowed fall outside of the 60 CNEL noise contour shown in the ALUP Figure 4-1, and nearly all of the area would be outside the 65 CNEL contour.

- **Section 2.10.1: Limitation of the ALUP; Existing Land Use** of the ALUP states: *Redevelopment of residential land uses shall not be precluded because of location with respect to Airport CNEL noise contours, but such redevelopment may not increase the number of residential units located inside the 60 dB CNEL noise contour and the design and construction of all new dwelling shall be adequate to mitigate noise impacts in accordance with Section 4.3.3 of this ALUP.*

Analysis: ALUP Policies N-1 through N-5 provide the criteria related to noise exposure for which development projects need to comply in order to be found consistent with the ALUP. The City intends to comply with these policies in its review of subsequent and applicable development projects, as they are also part of the City's regulatory framework. Any mitigation required to address identified noise impacts would be based on direction set forth in Section 4.3.3 of the ALUP. In addition, as conditioned, mixed use development would only be allowed within Safety Zone 6 which would result in all mixed use development being located outside of the 60 dB CNEL noise contour.

Safety Compatibility, Airspace Protection, and Overflight Protection Policies

The ALUP includes several related policies that address safety compatibility, airspace protection and overflight protection.

- **Section 4.4.5** of the ALUP includes safety-related policies intended to ensure land use compatibility with ongoing airport operations, minimizing risk to both lives and property. **Policies S-1, S-2 and S-3** collectively set forth criteria for determining land use compatibility, with specific references to Table 4-2 and 4-5 in the ALUP, which define maximum densities within various Safety Zones, and type of land uses allowed in those zones.

As described in Table 2 above, mixed-use development that would be allowed would conform with ALUP density restrictions. Within Safety Zone 6, maximum allowed densities far exceed those that would be allowed under the City's mixed-use zoning provisions. Within all other safety zones, the ALUP includes density requirements that are more restrictive than what would be allowed under the City's mixed-use zoning policies. However, the City's intent is to ensure consistency with the ALUP, and for that reason it would not consider mixed-use development in any safety zone except Safety Zone 6.

- **Section 4.5.4** includes **Policies A-1, A-2, A-3 and A-4**, which collectively address specific land use types or structures that could pose potential airspace incompatibility. Specifically, these policies refer to new structures, landscaping, landfills, and wetland creation. As described above, mixed-use development and associated landscape/hardscape improvements would be consistent with land use requirements within Safety Zone 6. The City's proposed change to the AASP would not allow for the development of landfills, nor does it contemplate wetland creation.
- **Section 4.6.3** includes **Policies O-1 and O-2**, which collectively require that those owning or living on properties within the airport area are informed of ongoing airport operations, and that aviation easements be recorded on affected properties. Future development pursuant to the City's proposed change to the AASP would be subject to those policies.

Analysis: The City is not requesting any deviation from the requirements of any safety, airspace protection or overflight policies in the ALUP. As proposed, the amendments to the AASP conform with these policies. Future development pursuant to the City's proposed change to the AASP would be subject to, and consistent with, those policies.

CEQA COMPLIANCE

The Final Programmatic EIR for the Airport Area and Margarita Area Specific Plans and Related Facilities Master Plans (“Final EIR”, or “AASP Final EIR”) addressed future development within the Airport Area Specific Plan. The Final EIR was certified in September 2003, and has provided the basis for evaluating the impacts of future development within the AASP area. Subsequent amendments to the AASP were subject to separate CEQA evaluations to address the potential impacts stemming from those amendments.

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. An Addendum to the certified Final EIR has been prepared to address the proposed changes to the AASP, and is included as **Attachment 6**. An Addendum need not be circulated for public review (CEQA Guidelines 15164(c)).

The County of San Luis Obispo Airport Land Use Commission conducted an Initial Study and prepared a Negative Declaration for the 2021 update of its Airport Land Use Plan (ALUP) (SCH: 2021030474). That environmental document was used to substantively inform the conclusions contained in the Addendum.

Individual projects that may be proposed under the AASP as amended would be subject to review under the California Environmental Quality Act (CEQA) as appropriate on a project-by-project basis.

RECOMMENDATION

Staff recommends that the ALUC review all materials related to the proposed amendment to the Airport Area Specific Plan in conjunction with the Airport Land Use Plan and provide a determination of consistency.

ATTACHMENTS

Attachment 1: Findings and Conditions of Consistency

Attachment 2: Summary of Parcels Affected

Attachment 3: ALUP Safety Zones Overlaying the AASP

Attachment 4: ALUP Noise Contours Overlaying the AASP

Attachment 5: Airport Area Specific Plan (Existing)

Included by digital link only at:

<https://www.slocity.org/home/showpublisheddocument/4294/637493456364330000>

Attachment 6: Addendum to the Certified Final EIR

**FINDINGS AND CONDITIONS OF CONSISTENCY
CITY OF SLO AASP AMENDMENT
ALUC FEBRUARY 19, 2025**

FINDINGS

1. The Amendments are consistent with General Land Use Policies G-1 through G-4 because: all information required for review of the Amendments was provided by the City; the Amendments (as conditioned) would not result in any incompatibilities to the continued economic vitality and efficient operation of the Airport with respect to safety, noise, overflight or obstacle clearance; and since some of the lots affected by the Amendments are located in more than one noise exposure area or Aviation Safety Zone, the standards for each such area will be applied separately to the land area lying within each noise counter or safety area unless the project is specifically reviewed by the ALUC and it elects at its sole discretion not to apply the requirements of the more restrictive zone in accordance with Policy G-4 of the ALUP;
2. The Amendments are consistent with the Noise Compatibility Policies N-1 through N-5 because the area affected by the Amendments is located outside the 60 dB CNEL contour and development of any extremely or moderately noise-sensitive uses are allowable and shall meet the requirements of interior noise levels specified in Table 4-1 and Section 4.3.3 of the ALUP;
3. The Amendments are consistent with the Safety Compatibility Policies S-1 through S3 because the Amendments only modify allowable uses within Safety Zone 6 and would not result in a density greater than that specified in Table 4-2; the Amendments would not result in a greater building coverage than permitted by Table 4-3; and the Amendments would not result in land uses other than specified in Table 4-5;
4. The Amendments are consistent with the Airspace Protection Policies A-1 through A-4 because the Amendments (as conditioned), existing City regulations, and distance from the Airport will ensure no structure, landscaping, apparatus, or other feature will create an obstruction or hazard to air navigation, do not propose new landfill or other disposal site, will ensure no structure, landscaping, apparatus, or other feature will create a wildlife attractant, and does not propose the creation of new or restored wetlands;

5. The Amendments are consistent with the Overflight Protection Policies O-1 through O-2 because the Amendments have been conditioned to require aviation easements be recorded for each property developed within the Project site prior to the issuance of any building permit or land use permit; and all owners, potential purchasers, occupants (whether as owners or renters), and potential occupants (whether as owners or renters) to receive full and accurate disclosure concerning the noise, safety, or overflight impacts associated with Airport operations prior to entering any contractual obligation to purchase, lease, rent, or otherwise occupy any property or properties within the Airport Area;

CONDITIONS

1. The City shall ensure that all applicable ALUP policies and aviation related development restrictions are enforced.
2. Utilizing the ALUP's California Building Code (CBC) calculation method (Figure 4-3), the Amendments shall limit mixed use density/ intensity for applicable property within the AASP planning area designated C-S and M as follows:
 - a. The maximum average density/ intensity shall be 300 persons per gross acre (average across entire site); and
 - b. The maximum single acre density shall be 1,200 persons per gross acre (maximum on any single acre).
3. The construction plans for proposed mixed use development that include structures or other objects that exceed the height standards defined in Title 14 of the Code of Federal Regulations (CFR) Part 77 as applied to the Airport, shall be submitted via FAA Form 7460-1 to the Air Traffic Division of the FAA regional office having jurisdiction over San Luis Obispo County at least 45 days before proposed construction or application for a building permit, to determine compliance with the provisions of FAR Part 77.
4. All future mixed-use development shall comply with all noise policies as required by the ALUP.
5. No structure, landscaping, apparatus, or other feature, whether temporary or permanent in nature shall constitute an obstruction to air navigation or a hazard to air navigation, as defined by the ALUP.

6. Any use is prohibited that may entail characteristics which would potentially interfere with the takeoff, landing, or maneuvering of aircraft at the Airport, including:
 - creation of electrical interference with navigation signals or radio communication between the aircraft and airport;
 - lighting which is difficult to distinguish from airport lighting;
 - glare in the eyes of pilots using the airport;
 - uses which attract birds and create bird strike hazards;
 - uses which produce visually significant quantities of smoke; and
 - uses which entail a risk of physical injury to operators or passengers of aircraft (e.g., exterior laser light demonstrations or shows).
7. Avigation easements shall be recorded for each property developed within the Project site prior to the issuance of any building permit or land use permit.
8. All owners, potential purchasers, occupants (whether as owners or renters), and potential occupants (whether as owners or renters) shall receive full and accurate disclosure concerning the noise, safety, or overflight impacts associated with Airport operations prior to entering any contractual obligation to purchase, lease, rent, or otherwise occupy any property or properties within the Airport area.
9. Any residential portion of a mixed-use development within the C-S and M land use designation within the AASP shall be located wholly within Safety Zone 6.

Attachment 2

Parcels within the C-S or M Designations in the AASP

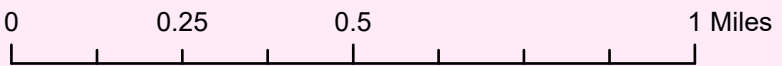
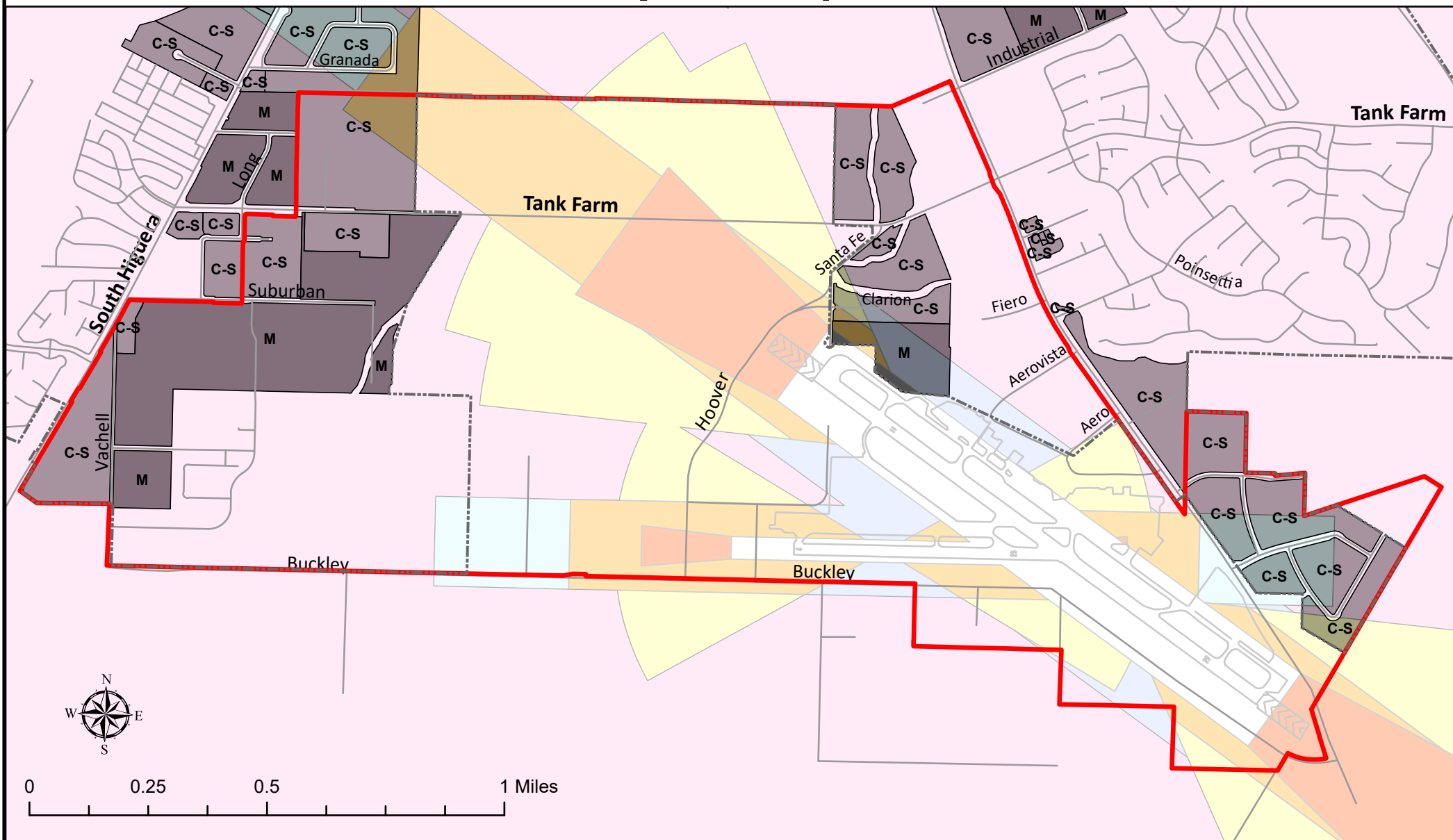
Site #	Parcel	Address	Total Acres	% in SZ 6	Eligible Acres	Zoning	ALUP Safety Zone	Status
1	053-251-068	215 Meissner	10.28	100%	10.28	C-S	6/2	vacant
2	053-251-074	237 Vanguard	1.12	100%	1.12	C-S	6	vacant
3	053-251-075	229 Vanguard	1.12	100%	1.12	C-S	6	vacant
4	053-251-076	250 Tank Farm	1.04	100%	1.04	C-S	6	vacant
5	053-251-077	253 Vanguard	1.04	100%	1.04	C-S	6	vacant
6	053-251-078	3880 Innovation	1.15	100%	1.15	C-S	6	vacant
7	053-251-079	3820 Innovation	1.43	100%	1.43	C-S	6	vacant
8	053-251-080	220 Vanguard	0.93	100%	0.93	C-S	6/2	vacant
9	053-251-081	260 Vanguard	0.90	100%	0.90	C-S	6/2	vacant
10	053-258-025	no address	7.29	100%	7.29	M	6	vacant
11	053-258-045	4015 Earthwood	0.26	100%	0.26	M	6	vacant
12	053-258-046	4045 Earthwood	0.28	100%	0.28	M	6	vacant
13	053-258-049	4120 Earthwood	0.21	100%	0.21	M	6	vacant
14	053-258-050	4130 Earthwood	0.21	100%	0.21	M	6	vacant
15	053-258-051	4140 Earthwood	0.21	100%	0.21	M	6	vacant
16	053-258-052	4150 Earthwood	0.21	100%	0.21	M	6	vacant
17	053-258-053	4160 Earthwood	0.21	100%	0.21	M	6	vacant
18	053-258-054	4170 Earthwood	0.21	100%	0.21	M	6	vacant
19	053-258-055	4180 Earthwood	0.21	100%	0.21	M	6	vacant
20	053-258-056	4190 Earthwood	0.21	100%	0.21	M	6	vacant
21	053-258-057	4195 Earthwood	0.21	100%	0.21	M	6	vacant
22	053-258-058	4185 Earthwood	0.21	100%	0.21	M	6	vacant
23	053-258-059	4175 Earthwood	0.21	100%	0.21	M	6	vacant
24	053-258-060	4165 Earthwood	0.21	100%	0.21	M	6	vacant
25	053-258-061	4155 Earthwood	0.21	100%	0.21	M	6	vacant
26	053-258-062	4145 Earthwood	0.21	100%	0.21	M	6	vacant
27	053-258-063	4135 Earthwood	0.21	100%	0.21	M	6	vacant
28	053-258-064	4125 Earthwood	0.22	100%	0.22	M	6	vacant
29	053-259-013	120 Venture	9.20	100%	9.20	M	6	vacant
30	053-412-025	1138 Farmhouse	2.53	100%	2.53	C-S	6	vacant
31	053-412-026	1130 Farmhouse	2.10	100%	2.10	C-S	6	vacant
32	053-412-029	no address	0.96	100%	0.96	C-S	6	vacant
33	053-427-004	1095 Farmhouse	1.13	100%	1.13	C-S	6	vacant
34	076-381-021	438 Tank Farm	59.93	20%	11.99	C-S	1/2/3/6	undeveloped
35	053-257-024	191 Tank Farm	6.78	100%	6.78	C-S	6	developed
36	053-257-037	196 Suburban	4.00	100%	4.00	M	6	developed
37	053-258-004	131 Suburban	7.06	100%	7.06	M	6	developed
38	053-258-005	no address	2.60	100%	2.60	M	6	developed
39	053-258-006	117 Suburban	0.15	100%	0.15	M	6	developed
40	053-258-007	1 Suburban	3.50	100%	3.50	M	6	developed
41	053-258-009	4150 Vachell	4.46	100%	4.46	M	6	developed
42	053-258-010	4180 Vachell	1.00	100%	1.00	M	6	developed
43	053-258-012	219 Tank Farm	5.99	100%	5.99	C-S, M	6	developed
44	053-258-014	240 Suburban	1.80	100%	1.80	M	6	developed
45	053-258-015	260 Suburban	1.87	100%	1.87	M	6	developed
46	053-258-017	4080 Horizon	3.28	100%	3.28	M, C/OS	6	developed
47	053-258-018	225 Suburban	0.55	100%	0.55	M	6	developed
48	053-258-023	4115 Horizon	2.08	100%	2.08	M, C/OS	6	developed
49	053-258-027	165 Suburban	2.25	100%	2.25	M	6	developed
50	053-264-002	4280 Vachell	10.53	100%	10.53	C-S	6	developed
51	053-264-003	4313 S. Higuera	1.00	100%	1.00	C-S	6	developed
52	053-264-004	4353 S. Higuera	9.11	100%	9.11	C-S	6	developed
53	053-422-001	4027 Santa Fe	6.01	85%	5.11	C-S, C/OS	6/3	developed
54	053-259-003	115 Venture	9.33	100%	9.33	M	6	developed
55	053-264-008	4115 Vachell	0.45	100%	0.45	C-S	6	developed
56	053-264-007	4251 S. Higuera	2.25	100%	2.25	C-S	6	developed
57	053-258-008	4025 S. Higuera	2.64	100%	2.64	C-S	6	developed
58	053-258-003	141 Suburban	2.06	100%	2.06	M	6	developed
59	053-258-033	143 Suburban	2.67	100%	2.67	M	6	developed
60	053-258-047	4085 Earthwood	0.26	100%	0.26	M	6	developed
61	053-258-040	4070 Earthwood	0.32	100%	0.32	M	6	developed
62	053-258-041	4090 Earthwood	0.28	100%	0.28	M	6	developed
63	053-258-026	181 Suburban	6.17	100%	6.17	M	6	developed
64	053-258-024	203 Suburban	7.29	100%	7.29	M	6	developed
65	053-258-023	4125 Horizon	2.08	100%	2.08	M	6	developed
66	053-258-017	4080 Horizon	3.28	100%	3.28	M	6	developed
67	053-258-019	4096 Horizon	0.68	100%	0.68	M	6	developed
68	053-258-020	4110 Horizon	0.56	100%	0.56	M	6	developed
69	053-258-021	4120 Horizon	0.53	100%	0.53	M	6	developed
70	053-258-022	4130 Horizon	0.51	100%	0.51	M	6	developed
71	053-257-030	181 Tank Farm	0.87	100%	0.87	C-S	6	developed

Attachment 2

72	053-257-040	179 Cross	1.03	100%	1.03	C-S	6	developed
73	053-257-043	3981 Steel	0.47	100%	0.47	C-S	6	developed
74	053-257-036	170 Suburban	0.45	100%	0.45	C-S	6	developed
75	053-257-031	187 Tank Farm	0.90	100%	0.90	C-S	6	developed
76	053-257-033	189 Cross	0.63	100%	0.63	C-S	6	developed
77	053-257-041	3976 Steel	0.61	100%	0.61	C-S	6	developed
78	053-257-042	3980 Steel	0.55	100%	0.55	C-S	6	developed
79	053-257-035	174 Suburban	0.50	100%	0.50	C-S	6	developed
80	053-257-034	178 Suburban	0.41	100%	0.41	C-S	6	developed
81	053-257-024	191 Tank Farm	6.78	100%	6.78	C-S	6	developed
82	053-257-039	211 Tank Farm	3.20	100%	3.20	C-S	6	developed
83	053-258-011	200 Suburban	1.21	100%	1.21	C-S	6	developed
84	053-258-029	253 Tank Farm	7.12	100%	7.12	M	6	developed
85	053-258-030	281 Tank Farm	3.86	100%	3.86	M	6	developed
86	053-258-031	305 Tank Farm	0.38	100%	0.38	M	6	developed
87	053-251-067	202 Tank Farm	2.93	100%	2.93	C-S	6	developed
88	053-251-057	202A Tank Farm	0.15	100%	0.15	C-S	6	developed
89	053-251-066	202H Tank Farm	0.29	100%	0.29	C-S	6	developed
90	053-251-065	202H Tank Farm	0.16	100%	0.16	C-S	6	developed
91	053-251-060	202E Tank Farm	0.09	100%	0.09	C-S	6	developed
92	053-251-058	202C Tank Farm	0.08	100%	0.08	C-S	6	developed
93	053-251-059	202D Tank Farm	0.12	100%	0.12	C-S	6	developed
94	053-251-063	202H Tank Farm	0.10	100%	0.10	C-S	6	developed
95	053-251-061	202F Tank Farm	0.13	100%	0.13	C-S	6	developed
96	053-251-062	202G Tank Farm	0.13	100%	0.13	C-S	6	developed
97	053-251-072	224 Tank Farm	4.28	100%	4.28	C-S	6	developed
98	053-421-006	600 Tank Farm	6.37	100%	6.37	C-S	6	developed
99	053-421-002	600 Tank Farm	5.32	100%	5.32	C-S	6	developed
100	053-421-005	650 Tank Farm	12.72	100%	12.72	C-S	6	developed
101	053-422-001	4027 Santa Fe	6.01	80%	4.81	C-S	6/3	developed
102	053-422-003	615 Tank Farm	2.64	100%	2.64	C-S	6	developed
103	053-422-002	635 Tank Farm	2.65	100%	2.65	C-S	6	developed
104	053-426-008	696 Clarion	0.88	100%	0.88	C-S	6	developed
105	053-422-004	645 Tank Farm	4.89	100%	4.89	C-S	6	developed
106	053-426-007	684 Clarion	0.53	100%	0.53	C-S	6	developed
107	053-426-006	no address	0.31	100%	0.31	C-S	6	developed
108	053-426-005	660 Clarion	0.28	100%	0.28	C-S	6	developed
109	053-426-004	648 Clarion	0.32	100%	0.32	C-S	6	developed
110	053-426-003	636 Clarion	0.34	60%	0.20	C-S	6/5	developed
111	053-426-012	645 Clarion	0.25	50%	0.13	C-S	6/5	developed
112	053-426-013	655 Clarion	0.25	100%	0.25	C-S	6	developed
113	053-426-014	675 Clarion	0.25	100%	0.25	C-S	6	developed
114	053-426-015	685 Clarion	0.24	100%	0.24	C-S	6	developed
115	053-426-016	695 Clarion	0.41	100%	0.41	C-S	6	developed
116	053-426-017	648 Clarion	4.40	60%	2.64	C-S	6/5	developed
117	053-423-017	4075 Santa Fe	6.70	25%	1.68	M	2/3/5/6	developed
118	053-412-024	1146 Farmhouse	5.08	100%	5.08	C-S	6	developed
119	053-427-001	1025 Farmhouse	1.18	98%	1.16	C-S	6/4	developed
120	053-427-002	1051 Farmhouse	1.07	100%	1.07	C-S	6	developed
121	053-427-003	1075 Farmhouse	1.07	100%	1.07	C-S	6	developed
122	053-427-005	1133 Farmhouse	1.19	100%	1.19	C-S	6	developed
123	053-427-027	1167 Farmhouse	1.12	100%	1.12	C-S	6	developed
124	053-427-026	1193 Farmhouse	1.33	100%	1.33	C-S	6	developed
125	053-427-028	no address	1.36	50%	0.68	C-S	6/4	developed
126	053-427-008	1250 Kendall	2.51	100%	2.51	C-S	6	developed
127	053-427-014	1275 Prospect	1.79	100%	1.79	C-S	6	developed
128	053-427-015	1251 Prospect	1.49	100%	1.49	C-S	6	developed
129	053-427-009	1201 Prospect	2.24	98%	2.20	C-S	6/4	developed
130	053-427-018	1255 Kendall	2.53	95%	2.40	C-S	6/4	developed
131	053-427-017	1200 Prospect	1.32	90%	1.19	C-S	6/4	developed
132	053-427-023	1220 Kendall	1.28	70%	0.90	C-S	6/4	developed

Airport Area Specific Plan (AASP)

Airport Safety Zones



- Airport Area Specific Plan
- City Limit
- Zoning**
- Service Commercial (C-S)
- Manufacturing (M)

- Airport Safety Zones**
- Zone 1: Runway Protection Zone
- Zone 2: Inner Approach/Departure Zone
- Zone 3: Inner Turning Zone
- Zone 4: Outer Approach/Departure Zone
- Zone 5: Sideline Zone
- Zone 6: Traffic Pattern Zone

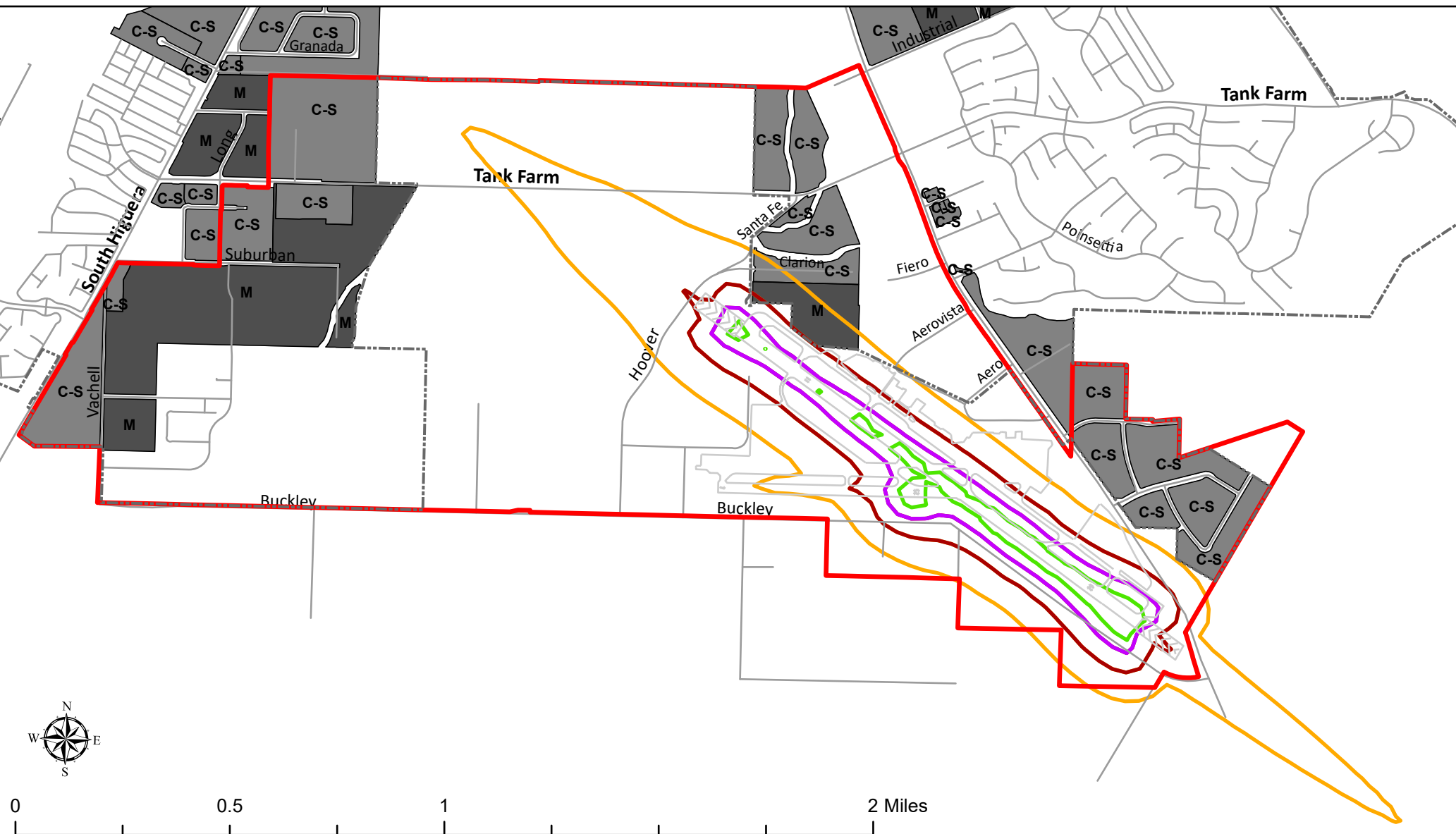




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January 2025



Airport Area Specific Plan (AASP)



Airport Noise Contours



 Airport Area Specific Plan
 City Limit

Zoning
 Service Commercial (C-S)
 Manufacturing (M)

Noise Contour Levels
 60 dB CNEL
 65 dB CNEL

 70 dB CNEL
 75 dB CNEL



SLOGIS

January 2025



Addendum to the Final Programmatic Environmental Impact Report for the Airport Area and Margarita Area Specific Plans and Related Facilities Master Plans

1. Project Title:

Airport Area Specific Plan Amendment to Allow Mixed-Use Development in the Service Commercial (C-S) and Manufacturing (M) zones subject to the approval of a conditional use permit

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:

Rachel Cohen, Principal Planner
805-781-7574

4. Project Location:

Airport Area Specific Plan area, generally bounded by South Higuera Street to the west, Meissner Lane to the north, Broad Street to the east, and Buckley Road to the south, in San Luis Obispo, CA

5. Project Applicant and Representative Name and address:

City of San Luis Obispo
Community Development Department
919 Palm Street
San Luis Obispo, CA 93401

6. General Plan Designation:

Services & Manufacturing

7. Zoning:

Service Commercial (C-S) and Manufacturing (M)

8. Description of the Project:

The Airport Area Specific Plan (AASP) is a land use program with policies, goals, guidelines and infrastructure financing strategies to guide future development to ensure land use compatibility within the AASP planning area. The AASP was adopted in 2005 and has been amended several times since then in response to changing conditions or opportunities unforeseen at the time of its adoption. The proposed project would amend the AASP to allow for mixed-use development (as defined in the City's Municipal Code) with a conditional use permit within parcels designated as either Service Commercial (C-S) or Manufacturing (M).

The AASP does not currently allow mixed-use development. The underlying reason for this was because of the area's proximity to the San Luis Obispo County Airport, and the established safety and noise areas that limited or prohibited noise sensitive residential uses or high density residential development. The southern portion of the City at that time was also viewed as the area most appropriate for industrial uses. In 2021, the San Luis Obispo County Airport Land Use Commission (ALUC) amended and restated the Airport Land Use Plan (ALUP) to address new technical information related to safety and noise, which resulted in a refinement of areas subject to land use restrictions under the ALUP, including areas within the AASP. As a result, there is now substantial area within the AASP where the land use restrictions have changed related to airport safety and noise, and creates opportunities for mixed-use developments.

No development would occur directly as a result of this action, which is simply a modification of existing land use requirements under the AASP. Future development under the modified land use requirements could occur as a result of individual project applications that must be approved by the City of San Luis Obispo through its normal development and conditional use permit review processes. However, the magnitude and timing of such development is speculative at this time, and would be influenced by a variety of issues, including market demand, property owner desire to develop, consistency with the ALUP, and potential environmental constraints that may apply to specific parcels where project development applications are under consideration.

The Project Area includes all parcels designated as Service Commercial (C-S) or Manufacturing (M) within the 1,200-acre AASP planning area. Figure 1 shows the location of C-S and M designated parcels within the AASP.

9. Project Entitlements Requested:

No project-level entitlements are requested or would occur as a result of this action. Instead, the resulting amendment would allow mixed-use development, subject to specific findings, with a conditional use permit in portions of the Airport Area Specific Plan currently designated as Service Commercial (C-S) and Manufacturing (M), consistent with the requirements of the City's Zoning Regulations, as they currently apply to C-S and M

designated lands in the remainder of the City. The reason this amendment is necessary is because as currently written, the AASP does not allow mixed-use development.

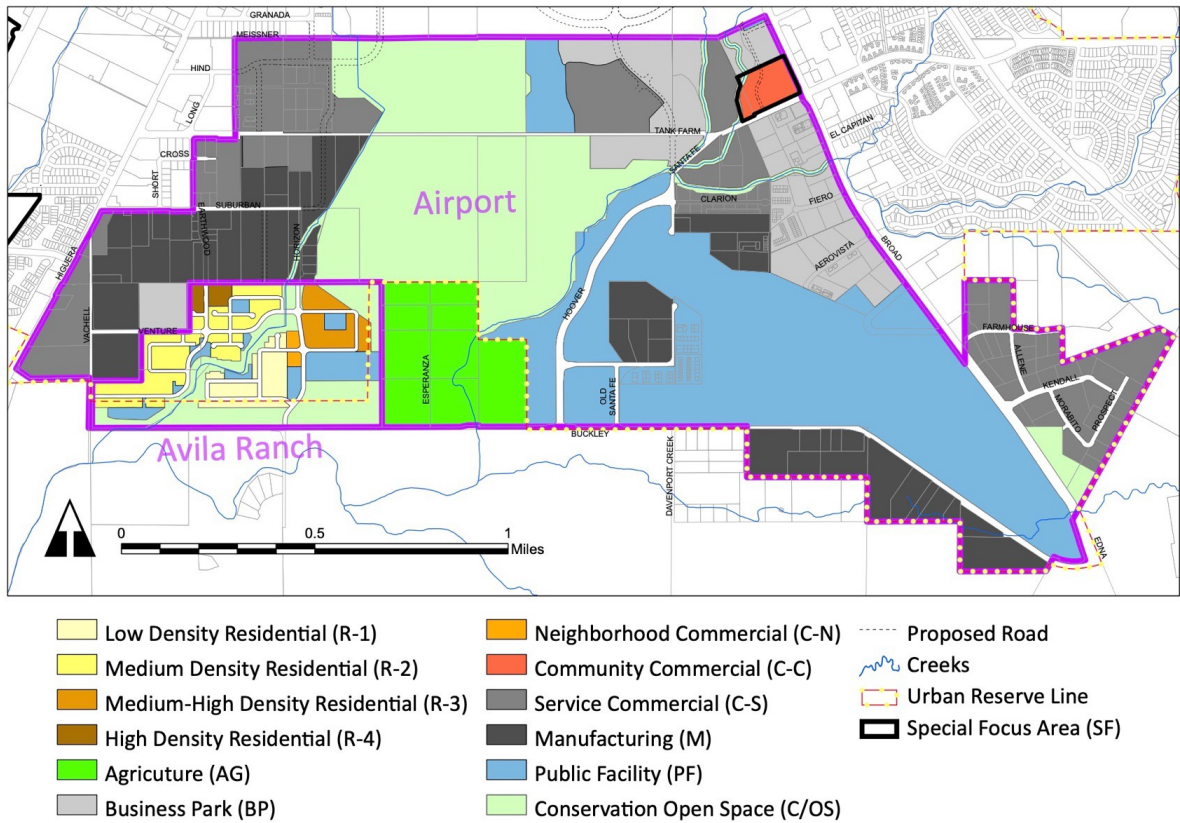


Figure 1: Existing Land Use Designations in the Airport Area Specific Plan

Development under the modified land use requirements would result from individual project applications that must be approved by the City of San Luis Obispo through its normal development and conditional use permit review processes. Proposed modifications to the Airport Area Specific Plan are described below in detail under the heading “New Information and Updated Project Elements.”

10. Previous Environmental Review:

The Final Programmatic EIR for the Airport Area and Margarita Area Specific Plans and Related Facilities Master Plans (“Final EIR”, or “AASP Final EIR”) addressed future development within the Airport Area Specific Plan. The Final EIR was certified in September 2003, and has provided the basis for evaluating the impacts of future development within the AASP area. Subsequent amendments to the AASP were subject to separate CEQA evaluations to address the potential impacts stemming from those amendments. In a similar manner, the analysis in this Addendum tiers from the original Final EIR.

Individual projects that may be proposed under the AASP as amended would be subject to review under the California Environmental Quality Act (CEQA) as appropriate on a project-by-project basis.

The County of San Luis Obispo Airport Land Use Commission conducted an Initial Study and prepared a Negative Declaration for the 2021 update of its Airport Land Use Plan (ALUP) (SCH: 2021030474). That environmental document was used to inform the conclusions contained in this addendum.

11. Purpose of the 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 AASP Final EIR, additional information has been identified which provides a more consistent Citywide approach to mixed-use development, specifically as it is allowed in the C-S and M zones. In 2021, the San Luis Obispo County Airport Land Use Commission (ALUC) updated its Airport Land Use Plan (ALUP) to address new technical information related to safety and noise, which resulted in a refinement of areas subject to land use restrictions under the ALUP and has created opportunities for mixed-use developments within the AASP. The proposed action requires an amendment to the AASP to allow for mixed-use in the C-S and M zones subject to a Conditional Use Permit. This project is described in more detail in subsequent sections of this EIR Addendum.

The purpose of this Addendum is to document the proposed change to the AASP, and to confirm that this change would not result in any new or more severe significant environmental effects not previously analyzed in the Final EIR, and would not modify any existing mitigation requirements described in that document.

The evaluation below discusses the issue areas that are relevant to this Addendum and covered by the previously approved Final EIR. The evaluation concludes that no new environmental effects are created and that there is no increase in the severity of previously identified significant effects.

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.

CURRENT REGULATORY FRAMEWORK FOR C-S AND M ZONES

San Luis Obispo County Airport Land Use Plan

Mixed-use development was not originally allowed at the time of the AASP's adoption in 2005 because of the area's proximity to the San Luis Obispo County Airport, and the established safety and noise areas that limited or prohibited noise sensitive residential uses or high density residential development. The southern portion of the City at that time was also viewed as the area most appropriate for industrial uses. In 2021, the San Luis Obispo County Airport Land Use Commission (ALUC) updated its Airport Land Use Plan (ALUP) to address new technical information related to safety and noise, which resulted in a refinement of areas subject to land use restrictions under the ALUP, including areas within the AASP. As a result, there is now substantial area within the AASP where the land use restrictions have changed related to airport safety and noise and creates opportunities for mixed-use developments..

Current AASP Requirements

For the reasons described above related to the ALUP, the AASP does not currently allow mixed-use development in either the Service Commercial (C-S) or Manufacturing (M) zones. As stated in Section 4.2.2 of the AASP, "areas designated Service Commercial are generally for storage, transportation, and wholesaling type uses, as well as certain retail sales and business services that may be less appropriate in other commercial designations." Similarly, Section 4.2.3 summarizes the intent of the Manufacturing designation as areas "for assembly, fabrication, storage and distribution, and sales and service type uses that have little or no direct trade with local consumers."

Table 4-3 of the AASP shows the allowed uses within each land use designation. Mixed-use is not allowed under either designation.

Other Relevant Regulatory Setting

There is an existing regulatory framework for allowing mixed-use in non-residential zones Citywide. Mixed-use development is allowed in the C-S and M zones in all parts of the City except within the AASP and other specific plan areas. Within both designations, the Zoning Regulations allow for residential development up to 24 density units per acre (Municipal Code Sections 17.36.020 and 17.40.020).

Final Environmental Impact Report

The 2003 Final EIR examined the policy framework and conceptual development under the AASP at a programmatic level. That document did not include project-specific analysis of the parcels potentially impacted by the proposed action. The FEIR impact analysis was general, and any required mitigation for key issue areas was programmatic, in consideration of cumulative development that might occur under the AASP. Please refer to the section below entitled "Analysis Of The Proposed Project In The Context Of The Final EIR" for further discussion of relevant issues and how they relate to the proposed Specific Plan Amendment

NEW INFORMATION AND UPDATED PROJECT ELEMENTS

NEWLY DISCOVERED INFORMATION

In recent years, the demand for housing in general, and affordable housing in particular, has risen dramatically in San Luis Obispo, as it has elsewhere. In response, the City's 2014 General Plan Land Use Element update reflects this increased demand, and includes several large areas for increased residential development, projects that have since been approved and are in the process of being completed. At the same time, the City has tried to address these issues by supporting mixed-use development, in areas where demand for non-residential development in Service Commercial or Manufacturing designated land has declined. The result is that the City allows mixed-use by right in the C-S and M zones outside the AASP. However, the AASP does not allow mixed-use development, because of previous safety and noise restrictions included in the ALUP. As described above, the 2021 update of the ALUP removed those restrictions that limited or prohibited mixed-use development.

The proposed project responds to the changes in the ALUP and increased housing demand in an evolving market by allowing for mixed-use development in the C-S and M land use designations in the AASP with the approval of a conditional use permit.

As discussed previously, the underlying reason why mixed-use development was not allowed in the AASP is because of the area's proximity to the San Luis Obispo County Airport, and safety and noise conflicts that could arise if residential development were allowed. In 2021, the San Luis Obispo County Airport Land Use Commission (ALUC) updated its Airport Land Use Plan (ALUP) to address new technical information related to safety and noise, which resulted in a refinement of areas subject to land use restrictions under the ALUP, including areas within the AASP. As a result, there is substantial area where the land use restrictions have changed related to airport safety and noise.

CHANGED BASELINE CONDITIONS AND UPDATED PROJECT ELEMENTS

The proposed project would amend the AASP, modifying various aspects of the plan in order to facilitate mixed-use development with approval of a conditional use permit in the C-S and M land use designations. It would not change any existing land use designation, nor would it result in more or less land designated as either C-S or M. Instead, it would modify existing language and tables in various parts of the existing AASP in order to facilitate mixed-use within these land use designations.

A detailed land use inventory was prepared in 2024 to verify the amount of C-S or M designated lands within the planning area. Table 1 below summarizes the results of the 2024 land use inventory for each designation, showing the total acreage of vacant and developed parcels in these two land use designations.

Table 1. Summary of 2024 Land Use Inventory C-S and M Parcels in the AASP			
Land Use Designation	<i>Acreage</i>		
	Developed (or entitled)	Vacant	Total
Service Commercial (C-S)	140.4	85.6	226.0
Manufacturing (M)	94.7	20.4	115.1
Total	235.1	106.0	341.1

Portions of land designated as either C-S or M are constrained from considering mixed-use development. Some of this constrained area remains within airport land use safety zones under the ALUP that do not allow for residential uses. Other parcels are too small or configured in such a way to make development challenging. Depending on the location, a variety of environmental constraints could present other challenges, including drainage features, steep slopes, or the potential for sensitive biological or cultural resources. Some parcels are adjacent to existing industrial land uses that produce odors or noise, which could make them less attractive for mixed-use development. Finally, many of these parcels are already developed with other uses, or are entitled for development. It is likely that only a few of these more constrained parcels will eventually support mixed-use development.

There is no specific mixed-use development project proposed at this time, but the amendment would allow the City to process and potentially approve applications that propose such development. However, the magnitude and timing of such development cannot be known at this time, and would be influenced by a variety of issues, including market demand, property owner desire to develop, and potential environmental constraints that may apply to specific parcels where project development applications are under consideration. For these reasons, it is speculative to determine what the residential buildout potential of this action is at this time, or how it might alter the non-residential buildout assumptions made in the AASP.

If mixed-use development were to occur, it would be based on the maximum density currently allowed under the Zoning Regulations, which is 24 density units per acre.

ANALYSIS OF THE PROPOSED PROJECT IN THE CONTEXT OF THE FINAL EIR

The updated project elements described above were not considered in the 2003 Final EIR, and so are analyzed here. The 2003 Final EIR examined the policy framework and conceptual development under the AASP at a programmatic level, which is also appropriate for the currently proposed Specific Plan Amendment. The following analysis examines the proposed project based on relevant issues from the 2003 Final EIR, with references to FEIR impact statements as appropriate. Implementation of the proposed project would not change any of the conclusions in the Final EIR, the level of significance or severity of any previously identified impact, or introduce any new mitigation measures. No changes to the Final EIR are required.

Land Use

The FEIR identifies the following land use impacts that are relevant to the proposed Specific Plan Amendment. As discussed in Impact LU-3, the Final EIR found the AASP was consistent with the ALUP in effect at the time of adoption of the AASP. No significant impacts were identified, and no mitigation was required. The Specific Plan amendment would allow for mixed-use development with approval of a conditional use permit, subject to potential constraints contained in the 2021 ALUP update. The County's environmental document for the 2021 update (SCH 2021030474) concluded that there would be no land use impacts or hazards associated with allowing more intensive development in the AASP, or mixed-use or residential projects in the ALUP area if development regulations in the ALUP were complied with. Individual development projects within the AASP would need to be consistent with any land use restrictions set forth in the ALUP. No new impact would occur.

Impact LU-4 discussed compatibility with surrounding land uses. No conflicts with surrounding uses were identified in the AASP, so impacts were less than significant, and no mitigation was required. Individual development projects within the AASP would need to be compatible with adjacent development, a determination that would be made through development and conditional use permit review processes and project-specific CEQA analysis for any such future action. No new programmatic impacts would occur.

Hydrology and Water Quality

Impact H-5 discussed exposure of people and/or property to flood hazards. The FEIR found that the conversion of land to urban uses has the potential to increase flooding hazards if new buildings were constructed within the 100-year flood hazard area. However, the specific plan includes explicit requirements for flood channel improvements that will avoid flooding impacts by providing enhanced control of floodwaters. This impact was considered less than significant.

Mixed-use development would be evaluated individually under CEQA, and would be required to comply with existing regulations related to flood hazards and water quality. No new programmatic impacts would occur, nor would there be an increase in severity of any existing impact.

Traffic and Circulation

Since the time the AASP FEIR was prepared, CEQA analysis related to this issue has been modified considerably. The focus of CEQA review is now based primarily on a study of Vehicle Miles Traveled (VMT), which can have potential impacts on regional air quality and greenhouse gas emissions. These issues were not examined in the Final EIR.

One purpose of mixed-use development is to reduce commute distances between residences and work places. In some cases, mixed-use development could make it possible for some residents to walk to work, which would potentially reduce VMT. In those instances, there would be a net positive effect on greenhouse gas emissions and air quality relative to what would otherwise happen under the AASP. Future individual development projects within the AASP would be evaluated on a case by case basis through a project-specific CEQA analysis. No new programmatic impacts related to these issues would occur.

Other transportation issues that were studied in the FEIR related to roadway Levels of Service (LOS), which is a metric no longer considered in CEQA documents. Instead, these are issues that would be appropriately addressed through the development and conditional use permit review processes, with recommendations for potential roadway improvement made through engineering studies.

Air Quality

The FEIR identified impacts related to both short-term construction emissions and long-term operations emissions. Short-term construction emissions were found to be significant but mitigable at a programmatic level, with mitigation taking the form of following a variety of standard construction management techniques and following the existing regulatory framework set forth by the Air Pollution Control District (APCD). The impacts of specific development projects would be analyzed and mitigated as needed on a case by case basis.

Similarly, long-term operational impacts were also found to be less than significant with programmatic mitigation. The FEIR included the following relevant mitigation measure:

Mitigation Measure AIR-2.1. Implement Growth-Phasing Schedule. The City will implement a growth-phasing schedule for the Airport area, to assure that nonresidential development in the urban area does not exceed the pace of residential development.

The consideration of mixed-use development in the Airport Area is consistent with this mitigation requirement, as it allows for greater flexibility and opportunities to approve residential development in balance with non-residential development. Future individual development projects within the AASP would be evaluated on a case by case basis through a project-specific CEQA analysis. No new programmatic impacts related to this issue would occur.

Noise

The FEIR examined relevant programmatic impacts related to traffic and aircraft noise, but found them to be less than significant. For aircraft noise, this was because future development under the AASP was determined to be consistent with the ALUP. For traffic noise, it was determined that the City's General Plan Noise Element included sufficient implementation requirements and strategies to ensure that noise would be mitigated on a project-by-project basis as appropriate, through the recommendations of project-specific noise studies. Future individual development projects within the AASP would be evaluated on a case by case basis through a project-specific CEQA analysis. The County's environmental document for the 2021 update (SCH 2021030474) concluded that there would be no noise impacts or hazards associated with allowing more intensive development in the AASP, including mixed-use or residential projects in the ALUP area, if development regulations in the ALUP were complied with. No new programmatic impacts related to this issue would occur.

Public Services and Utilities

The FEIR examined potential programmatic impacts related to the provision of water and wastewater services from buildout under the AASP, but concluded these would be less than significant because projects would be required to follow the regulatory provisions included in the

General Plan, AASP and relevant utilities master plans. Similarly, programmatic impacts related to storm drainage were considered less than significant because projects would be required to follow the provisions of the Storm Drain Master Plan. Impacts related to solid waste disposal were also considered less than significant, as projects would be required to follow regulatory provisions included in the General Plan and AASP.

Impacts related to law enforcement were considered less than significant, as future staffing and facilities would be addressed through fiscal studies as needed. Impacts to fire protection services were also considered less than significant with the following mitigation measure:

PS-1. New Fire Protection Personnel. To mitigate the impacts associated with buildout of the [AASP], a sufficient number of fire protection personnel should be hired to maintain a ratio of one firefighter for every 1,000 residents.

Determining the appropriate level of public services staff is typically addressed in the City's annual budget cycles, with recommendations resulting from studies to service impacts that are projected to occur based on reasonably foreseeable cumulative development. The proposed project does not facilitate any specific development project, so the magnitude of potential long-term impacts to public services is speculative, and would be addressed on a case-by-case basis as development projects are proposed. No new programmatic impacts related to this issue would occur.

Impacts to schools were found to be less than significant. Mitigation is limited to the payment of statutory fees, and no additional school-related impact fees may be imposed above the limits established in statute (Government Code Section 65595 et seq). No new programmatic impacts related to this issue would occur.

Impacts to parks and recreation were found to be less than significant, as buildout of the AASP would not increase demand over the established park service standard of 10 acres per 1,000 residents. The amount of residential development that might occur under the mixed-use provisions of the project is speculative, and would be limited by a combination of market factors, property owner desire, lot configuration, and environmental constraints. Impacts to parks and recreation would be considered on a case by case basis as individual development projects are proposed. No new programmatic impacts related to this issue would occur.

Other Issues

The proposed project would not introduce new development into areas that were not already planned for urban uses. Therefore, for all other issues related to resource protection (biological resources, cultural resources, agricultural resources, and the exposure to hazardous materials), the potential impact of new development would not change, so the existing impact analysis for each issue would also remain unchanged. No new programmatic impacts related to these issues would occur.

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. Based on the analysis of the proposed project, no new changes to the Final EIR are required. The proposed project 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, particularly affordable housing, within the City.
3. The changes are consistent with City goals related to mixed-use that would encourage alternative forms of transportation and reduce Vehicle Miles Traveled (VMT), which relates to reducing air emissions, including greenhouse gas emissions.

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 the proposed Specific Plan Amendment.