

**Carolina Brown**

**Nipomo, CA**

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June 25, 2023

LAFCO- Local Agency Formation Commission  
1042 Pacific Street, #A  
San Luis Obispo, CA 93401

Subject: Strong Opposition to the Proposed Mega Housing Development The Dana Reserve

Dear LAFCO:

I hope this letter finds you well. I am writing to express my deep concern and opposition to the proposed Dana Reserve development in our small town, Nipomo. As a 19 year resident and stakeholder, I strongly believe that the approval of such a project would have severe and detrimental consequences for our community. Kindly permit me to provide further details.

The proposed housing development, which aims to add 25% or more to Nipomo's population, raises significant concerns regarding the inadequate infrastructure to support such growth. Nipomo's existing infrastructure, including roads, utilities, schools, emergency services and healthcare providers, is already strained and struggling to meet the needs of the current population. The addition of a substantial number of new residents without a corresponding upgrade in groundwork would elevate these challenges, leading to a decline in the quality of life for all residents.

#### **ADVERSE EFFECTS**

I would like to bring your attention to the following *adverse effects* that would arise from this mega development:

#### **HOUSING**

**Dense cluster living and pricey \$\$ housing:** The Dana Reserve development appears to prioritize density over livability and affordability. By density, I'm referring to the proposal to construct over 831 Single Family Residences and 460 Multi-Family Residences in 10 cluster hoods on a 288-acre site. Regardless of how it is presented or the promises made, it is highly probable that such densely packed housing will be financially unattainable for the average individual in our community. Dana Reserve will not enhance housing opportunities for the existing residents of Nipomo. Numerous online affordability calculators clearly indicate that the average middle-class individual would require a substantial amount of funds to purchase a home in this area. Furthermore, when factoring in taxes, HOA fees, principal and interest, PMI, as well as insurance, the costs become unattainable for the majority. Even for the designated "low-income units" they propose, the financial burden remains excessively high. Addi-

tionally, I have reservations about the requirement for local residents to prove a shortened commute in order to prioritize their home purchase within this development.

**A. Water:** I am astonished to hear that Dana Reserve customers will face higher water rates compared to existing customers, solely due to the fact that they will be charged exclusively for imported water from our neighboring city, Santa Maria. I find myself deeply perplexed regarding the water-related matter at hand. This does not align with the credibility of Mr. Tompkins. Despite his assertions, it is difficult to comprehend how this development would result in lower water rates for existing residents. In addition, I am profoundly troubled by the fact that Mr. Tompkins solely focuses on the infrastructure related to the NCS D and our water supply, neglecting to address any other necessary public works improvements.

**B. Attracting wealthy investors and retirees:** Dana Reserve is likely to attract affluent investors and retirees from urban areas such as Los Angeles, Orange County, and the Bay Area. Furthermore, there is a strong likelihood that higher-income individuals will eat up the lower-cost housing options. This influx could lead to an imbalanced socio-economic environment, escalating property prices, and heightening the marginalization of the local population, similar to the effects observed with previous massive golf course master planned communities in Nipomo.

**C. HOAs:** The impact a developer has on their project's Homeowners Association (HOA) can vary depending on several factors, including the developer's involvement, the initial setup of the HOA, financial contributions, and the developer's own decisions and actions. Proposed Dana Reserve Homeowners Association (HOA) can vary and may be unknown until more information is available. Mr. Tompkins decisions and actions can be a source of concern and uncertainty for homeowners, especially if there is a lack of transparency or if their actions are not aligned with the best interests of the community. Homeowners rely on the developer to fulfill their obligations, provide necessary resources, and ensure the successful management and operation of the project. This is an alarming proposition given the magnitude of this development.

**D. Lack of parking:** The proposed development appears to lack adequate parking facilities to accommodate the increased population, which would intensify parking issues and inconvenience residents and visitors alike. As someone who has visited friends living in HOA communities, I can attest to the significant parking issues firsthand.

## **COMMERCIAL COMPONENT AND JOBS**

**Disproportionate housing and commercial space:** It's alarming to note that this development is projected to accommodate approximately 4600+ new residents while generating only 275 new jobs. This significant disparity raises several issues that warrant careful consideration and intervention. The proposed allocation of housing and commercial spaces appears disproportionate, potentially leading to imbalances in community development, limited local business opportunities, and an unfavorable landscape.

**A. Limited job opportunities:** Nipomo lacks a sufficient number of employment opportunities to support the proposed housing development. This could result in increased unemployment rates and further economic hardships for local residents.

**B. Economic imbalance:** Dana Reserve, as currently outlined, risks creating an economic imbalance in our community. With a considerable increase in residential units and a disproportionately low number of new jobs, we run the risk of an oversupply of housing without adequate employment opportunities. This can lead to economic stagnation, limited income growth, and increased commuting outside our town in search of suitable employment.

**C. Commuting burden:** The lack of job opportunities within our town forces residents to commute to neighboring areas for work, contributing to increased traffic congestion, longer commuting times, and additional strain on transportation infrastructure. This not only diminishes the quality of life for residents but also contradicts the goal of sustainable and localized development of Dana Reserve.

**D. Social implications:** A thriving community relies on a healthy balance between housing and job opportunities. The imbalance in the proposed development may result in socio-economic disparities, as some residents may struggle to find suitable employment locally, hindering their ability to meet their financial needs and contribute to the overall well-being of our community. This imbalance can potentially lead to increased inequality and social divisions.

## **TREES**

**Destruction of 100-year-old oak trees:** The proposed development's disregard for the preservation of our natural heritage, including the destruction of endangered oak trees, demonstrates a lack of commitment to environmental conservation and sustainable development. To me and many other community members, one of the most distressing aspects of this development is the potential destruction of over 3900+ live oak trees. I implore you to carefully consider the irreversible environmental impact that such extensive tree removal would have on our community. Mr. Tompkins proposition to plant oak saplings on an off-site location pales in comparison to the irreversible damage caused by the destruction of grand live oak trees. Live oak trees are not just majestic symbols of natural beauty; they play a crucial role in maintaining the ecological balance and providing numerous benefits to our town and its residents. Here are some key points to highlight the significance of these trees and the adverse effects of their destruction:

**A. Destruction of ecosystems and wildlife displacement:** Live oak trees provide essential habitats for a diverse range of wildlife, including birds, mammals, and insects. The destruction of these trees would displace wildlife, disrupt the natural balance, and diminish the biodiversity that makes our area unique. Dana Reserve development threatens valuable woodlands and habitats. This would result in a negative impact on our environment.

**B. Environmental impact:** Live oak trees contribute significantly to our local ecosystem by providing shade, reducing air pollution, and absorbing carbon dioxide. Their loss would have detrimental consequences for air quality for Nipomo residents.

**C. Loss of natural heritage:** Many of these live oak trees are believed to be several decades, if not centuries, old. They are a living testament to our town's history and heritage, connecting us to our past and enriching the landscape. Their carving up and destruction would be an irreparable loss for future generations.

**D. Impact on aesthetics and landscape:** The visual impact of 3900+ live oak trees cannot be understated. Their graceful presence enhances the beauty of our surroundings and contributes to the our residents have grown fond of the scenic appeal that adds to the charm of Nipomo. The removal of these trees would drastically alter our landscape, eroding the natural charm of our town.

**E. Negative psychological impact:** Trees have been proven to have positive effects on mental health and well-being. Their presence contributes to a sense of tranquility, peace, and connection with nature. The depletion of numerous live oak trees would rob our community of these irreplaceable advantages. I can wholeheartedly endorse this sentiment, as I am someone deeply attuned to the natural world.

### **COMPOUNDING TRAFFIC**

**Increased traffic:** Nipomo is known for its rural charm, characterized by its lack of sidewalks, street lights, and relaxed lifestyle. This unique setting has attracted equestrians, mothers and fathers with baby strollers, dog walkers, cyclists and others who have put their faith in the hands of drivers on our roads. However, the influx of additional residents from the ongoing and proposed housing developments will significantly increase traffic volume, creating a more dangerous environment for everyone involved. Nipomo's road network is ill-equipped to handle the increased traffic volume that would result from the influx of new residents. This would lead to significant congestion, longer commute times, and compromised road safety. As a resident and someone who frequently relies on our roads for equestrian activities, I personally experience weekly close calls with drivers who do not exercise caution or respect when sharing the road. The projected rise in traffic will only amplify these risks, endangering the safety of vulnerable road users. With more vehicles on the road, there is an increased likelihood of encountering distracted and careless drivers. In addition, the development will have a significant impact on traffic along the highway in close proximity to the project.

### **PUBLIC SERVICES**

**Lack of emergency services and increased strain on public services:** Our existing emergency services are already stretched thin due to the current population demands. Introducing a substantial increase in residents without adequate reinforcements would lead to delayed response times. Furthermore, it is crucial to acknowledge that we are already experiencing delayed response times, and the proposed development will only exacerbate this issue, compromising public safety and well-being. Without corresponding upgrades, the quality and accessibility of these vital services may suffer. On a particularly busy evening (assuming,) I've personally experienced waiting for over 45+ minutes for emergency personnel to respond to my urgent request for assistance. In the past few years, I have reached out to emergency response services on at least three occasions, and it has become evident that there is a lack of availability in public services.

### **HEALTHCARE ON THE CENTRAL COAST**

**There is a shortage ~Deficiency in healthcare professionals and facilities:** Our community and neighboring communities already faces a shortage of healthcare professionals and medical facilities. Obtaining a quality physician in our area is a challenge that doesn't necessitate a study to confirm. Introducing a significant population increase without corresponding improvements in healthcare infrastructure would strain resources and compromise access to quality healthcare services.

### **NIPOMO SCHOOLS**

**Overcrowded schools:** Our schools are already operating at or near capacity. The proposed development would further strain the educational system, resulting in overcrowded classrooms, diminished quality of education, and a lack of resources for students. I respectfully request a thorough review of the existing Environmental Impact Report (EIR), which highlights that Nipomo High School is already operating at full capacity. The development of the Specific Plan Area would aggravate this concern, exceeding the school's capacity limits. Personally, I have had conversations with several teachers in Nipomo who share apprehensions regarding the implications of this project on the local schools.

### **INCREASED CRIME**

**It's a real threat:** The rapid growth in population without corresponding resources for law enforcement and community support programs could lead to a rise in crime rates, jeopardizing the safety and security of our community. The relationship between increased housing and increased crime can be attributed to several factors. Undoubtedly, while this correlation may be indirect, it remains a very serious matter. When housing developments expand and the population grows, it can lead to various social and economic changes that can indirectly contribute to an uptick in criminal activities. Here are some potential reasons for this correlation: population density, socio-economic factors, infrastructure strain, transient populations and limited social control. In my personal experience of residing in Nipomo for the past 19 years, I have witnessed a rise in criminal activities, including incidents such as auto theft, mail and package theft, and property vandalism.

### **WHO'S RESPONSIBLE FOR THE COST OF INFRASTRUCTURE?**

The financial burden on the developer is an important aspect to consider in relation to this mega development. Given the scale and complexity of such a project, it is reasonable to question whether Mr. Tompkins has the sufficient resources to cover the entire cost of infrastructure improvements that would be required to support the increased population.

Developing Dana Reserve will entail significant expenses, including the construction and maintenance of roads, utilities, schools, and other essential infrastructure. These costs will be substantial and may exceed the capacity of the developer to finance independently. Consequently, there exists a real possibility that the responsibility for funding these infrastructure improvements may be transferred to the community or local government. Given the historical precedent, sadly Nipomo has previously experienced inadequate allocation of funds for our community.

Mr. Tompkins is avoiding addressing the inquiry concerning the funding of crucial elements such as the Cuesta College campus, non-profit daycare center, fire station, and essential infrastructure upgrades. I am seeking clarity on the responsible party for covering the costs associated with these initiatives. Despite including the land and it being donated, there is no guarantee of their successful implementation and construction. The crucial question remains: **Who will bear the financial responsibility?** I would greatly value receiving information regarding the financing of the proposed college campus, daycare center, fire station and other planned public centers.

If Mr. Tompkins does not have the financial means to cover the full cost of infrastructure improvements, it raises concerns about the long-term sustainability and financial viability of the development. Inadequate funding for essential infrastructure could lead to subpar facilities, delayed and increased construction costs, or the need for additional funding sources, potentially impacting the quality of life for both existing and new residents. This situation would be cause for alarm.

It is crucial for the community and local authorities to carefully evaluate Mr. Tompkins financial capacity and ensure that appropriate mechanisms are in place to safeguard the community's interests. This may involve negotiating agreements that hold Mr. Tompkins accountable for his financial obligations or for him to explore alternative financing options to ensure that the burden of infrastructure costs are not unfairly shifted onto the community and residents of Nipomo.

#### **CURRENT RESIDENTS COEXISTING WITH ANOTHER MASTER PLANNED COMMUNITY**

An enormous housing development such as Dana Reserve has the potential to generate frustration and resentment among current residents for various reasons. Here are some factors that can contribute to this sentiment:

- 1. Decreased quality of life and strain on existing resources:** The influx of new residents without corresponding improvements in infrastructure and amenities may result in a decreased overall quality of life for Nipomo residents. We may perceive a decline in the availability and accessibility of public spaces, increased competition for resources, and diminished community services. These factors can contribute to resentment towards the development and its impact on our daily lives.
- 2. Change in community dynamics:** Current residents such as myself feel a sense of attachment to their community and the way of life it offers. The introduction of a massive housing development can disrupt the established dynamics and alter the character of the neighborhood. Such changes can evoke a sense of loss or displacement among long-time residents, a sentiment I can personally identify with.
- 3. Loss of woodlands and green areas:** This project necessitates substantial land utilization, which will lead to the depletion of open spaces that hold great value for the current residents. The destruction of natural habitats, oak trees, and scenic landscapes will lead to a sense of loss and resentment among us who appreciate the environmental aspects of our community.
- 4. Cultural and social changes:** Large-scale housing developments can bring about cultural and social shifts within a community. We may perceive a dilution of our community's unique identity and a loss of

the close-knit relationships and familiar social networks we have developed over time. The perception of cultural and social transformation can breed animosity and opposition towards the development, and I anticipate experiencing such sentiments myself.

**5. Unsuitability in the current economic climate:** Given the economic challenges and rising inflation our country is currently facing, investing in such an expensive and extensive development may not be prudent. It is essential to consider the economic viability and sustainability of this project in the present circumstances.

It is crucial for Mr. Tompkins, local authorities, and county supervisors to consider these potential concerns and actively engage with current residents throughout the development process. Transparent communication, meaningful community involvement, and efforts to address the existing residents' needs and concerns can help mitigate resentment and foster a sense of unity and cooperation within the community.

## **APPROACHES TO RESPONSIBLE GROWTH AND DEVELOPMENT**

While I understand the need for *responsible growth and development*, it is essential to find a middle ground between meeting housing demands and preserving the unique character and quality of life in our town. With this in mind, I would like to propose alternative approaches that may better align with the needs and aspirations of our community:

**1.) Reducing the number of residences:** Instead of pursuing a large-scale development, consider reducing the number of proposed residences to a more manageable and sustainable level. This would help alleviate the strain on existing infrastructure and resources, ensuring a smoother transition for our community.

**2.) Increasing commercial building aspects:** In order to foster a vibrant local economy and create job opportunities for residents, it would be beneficial to increase the focus on commercial buildings within the development plan. This approach would attract businesses, stimulate local employment, and enhance economic growth while mitigating the strain on residential services.

**3.) Enhancing community infrastructure:** Before considering large-scale developments, prioritize investments in public works upgrades that are necessary to support the existing population. This includes improving roads, utilities, schools, and emergency services to ensure the well-being and safety of residents.

**4.) Traffic Study:** I propose conducting a recent traffic study instead of relying on an outdated assessment conducted during the COVID-19 pandemic lock down. This assessment should consider the existing road conditions, the projected increase in traffic volume, and the potential challenges faced by vulnerable road users.

## **KEEPING PEACE AND HARMONY**

**A. Preservation of rural charm:** Nipomo is cherished for its small town charm, ranchettes, acreage between neighbors and its embrace of country living, Ag production and farming activities and live-

stock raising. Reducing the scale of the proposed development would help maintain and the harmonious coexistence of our community members, and ensure the future growth aligns with our rural identity.

**B. Sustainable growth:** It is crucial to prioritize sustainable growth that finds a happy medium between meeting housing needs and preserving the environmental, social, and economic aspects of our town. By reducing the development size, we can mitigate the strain on existing infrastructure and enhance the overall livability of our community.

**C. Infrastructure limitations:** A significant increase in development without corresponding upgrades would place an unbearable burden on these systems, leading to service disruptions and compromised quality of life for the residents of Nipomo. Scaling down the proposed development would enable a more manageable growth.

**D. Conservation of natural resources:** Our town is blessed with abundant natural resources. By reducing the scale of the development, we can minimize the destruction of these valuable resources and safeguard the natural beauty that we all love and wish to share with generations to come.

**E. Maintaining community unity:** Nipomo thrives on a close-knit community spirit, where neighbors know and support each other. Overly large-scale development may disrupt this cohesion, leading to a loss of community identity and a decline in the sense of belonging. By reducing the proposed development, we can maintain the intimate atmosphere that makes our town so special.

**F. Consideration of residents' needs:** It is essential to consider the needs and preferences of the current residents in any development plan. By reducing the scale of the proposed development, we can ensure that housing options remain accessible and affordable for us, the existing residents, by maintaining the social fabric of our town.

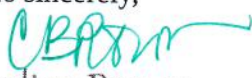
### **STRIKE A BALANCE**

By exploring these alternative options, we can achieve equilibrium between accommodating growth and preserving the character, heritage, and livability in Nipomo. It is crucial to engage with Mr. Tompkins, community members, residents, county staff and county supervisors in open dialogue to find solutions that benefit everyone involved.

I kindly request that you carefully consider these alternative approaches and engage in a comprehensive review process that takes into account the concerns and aspirations of our community. Together, we can shape a future that upholds the values and unique qualities that make our town so special.

Thank you for providing me with the opportunity to share my thoughts and concerns. I trust that you will consider the viable alternatives presented and work towards a solution that aligns with the best interests of Nipomo and its residents.

Yours sincerely,



Carolina Brown



Supporting Documents

1. Dana Reserve Website, Local Priority, June 2023
2. Dana Reserve, Letter to the community, June 2023
3. Santa Lucian, "The County Needs to Fix or Nix the Dana Reserve," Nov/Dec 2022
4. Santa Maria Sun, "Local journalists overlooked an important document for Nipomo's Dana Reserve Development," Jan 2023
5. Santa Maria Sun, "Dana Reserve environmental impact report details project's footprint on Nipomo oak-studded ranch land," July 2022
6. California Native Plant Society, "CNPS Review of Preparation and Initial Review of DR," July 2021
7. Santa Lucian, "Woodsman, Spare Those Trees," Sep/Oct 2022
8. Personally taken snapshots illustrating the congestion on SB 101 between Los Berros and Willow on an average Tuesday afternoon at 4:53 pm.
9. The Tribune Editorial Board, "The Central Coast is facing a 'doctor drought.'" Mar 2019
10. Dana Reserve Website, Higher Education within Reach at Dana Reserve, June 2023
11. Dana Reserve Website, Rooted in Central Coast Culture, June 2023

## LOCAL PRIORITY

The Dana Reserve is unique in that the goal from the start was to include as many homes as possible that would be considered homes for the "missing middle". The focus is on building homes for our current workforce. The Regional Housing Needs Assessment (or RHNA) identifies the need for 3,256 new homes in the unincorporated area of the County.

In 2019 SLO County conducted a study that identified the Canada Ranch, now the Dana Reserve, as the South County location to help meet County's RHNA housing needs.

The result is, as proposed, two-thirds of the homes are projected to be workforce housing or less. Workforce housing is based on median income and for San Luis Obispo County that falls in the \$600k range, which is still expensive. But it will only become more expensive to be a homeowner in our county.

The Dana Reserve will give a priority to local residents for home sales and also to interested buyers that can prove that living at the Dana Reserve will reduce their vehicle miles traveled as compared to their existing residence.

# DANA RESERVE



Doc # 2

Dana Reserve  
110 S. Mary Ave  
Ste 2 PMB 128  
Nipomo, CA 93444

Dear Nipomo Neighbor,

My name is Nick Tompkins, and I am the Managing Partner for the Dana Reserve – a new home community proposed in Nipomo, located south of Willow Road and east of Pomeroy. As a fifth-generation family in Nipomo that still lives less than a mile from the Dana Reserve, we want to create a project that maximizes the benefits for Nipomo and surrounding areas. Through hundreds of internal meetings, over 50 community stakeholder discussions, thousands of pages of analysis, and 31 iterations of the design, we have created the current Dana Reserve development proposal which we believe is a benefit for the community we call home.

**Today, I would like to address one community benefit of the project which is particularly important in Nipomo: Water.**

Prior to this letter, the Nipomo Community Services District (NCSD) contracted 3rd party engineering groups to perform three separate and exhaustive studies on the impact of the Dana Reserve on the Nipomo Basin's sustainability, your rates for water and sewer, and the water and sewer infrastructure that services your home. The NCSD's studies reveal that this project will not decrease water supply or place financial burden on current ratepayers.

**Study #1 The strength and sustainability of your water supply now and into the future**

**Finding:** Adopted by the NCSD Board of Directors in December 2021, this study demonstrates that not only is there sufficient water to serve the Dana Reserve, but that if every existing home added and utilized an ADU, and every vacant lot in the NCSD was built and included an ADU, and the Dana Reserve was fully built out and operational, the NCSD would have 400-acre feet (130,340,400 gallons) per year of excess water supply – even in times of extended drought.

**Study #2 The impacts on water rates and sewer rates for existing customers**

**Finding:** The NCSD contracted study, the Tuckfield report, estimates the Dana Reserve will reduce NCSD water rates and reduce sewer rates by a very substantial 30%. Dana Reserve customers will pay a higher water rate than existing customers because they will pay exclusively for more expensive imported water from the City of Santa Maria (which NCSD already has a contractual obligation to purchase). Dana Reserve will shield existing ratepayers from these costs which will solely burden existing ratepayers if new customers are not added to the NCSD.

# DANA RESERVE



**Study #3 The cost of any infrastructure that will be required to serve the Dana Reserve**

**Finding:** The NCS D contracted study demonstrates the Dana Reserve will fund the improvements needed to serve the development and its retroactive share of existing infrastructure through one-time, upfront NCS D sewer and water connection fees (\$31,000,000). An additional commitment of \$4,500,000 by the Dana Reserve to NCS D will be dedicated to other needed infrastructure improvements as determined by their Board of Directors.

To read the studies, please visit [ncsd.ca.gov](https://ncsd.ca.gov) for the full reports or, additionally, see the following pages for more detailed information.

We raised our family in this community and have watched our own kids struggle to buy a home as they've returned. We've seen our friends' children move out of the area because they could not afford to live where they grew up. We believe we must provide affordable, yet responsible housing, and I know this project can do that.

Thank you for your time,

Nick Tompkins

## More Detailed Study Summaries

### Study #1: NCS D Urban Water Management Plan (UWMP) Study –

<https://ncsd.ca.gov/wp-content/uploads/2021/12/MKN-NCSD-UWMP-2020-Final-Draft.pdf>

Study Prepared by MKN & Associates for Nipomo Community Services District – December 2021

This 2020 study was adopted by the Board of Directors of the NCS D in December of 2021 to serve as a five-year update to the Urban Water Management Plan (UWMP) - a required document by the state of California, Department of Water Resources.

The adopted plan considered the water supply sustainability for NCS D ratepayers through 2045. To be conservative, the NCS D assumed that within the district, every vacant lot had been fully developed, 100% of homeowners built and utilized an Accessory Dwelling Unit (ADU), and the Dana Reserve was fully developed as planned.

# DANA RESERVE



Under these assumptions, the UWMP reached the conclusion that not only is there sufficient water to supply the Dana Reserve and existing NCSD customers - even in times of extended drought - but that there remains 400-acre feet per year of excess unallocated water. (UWMP, pg. 7-6)

The study demonstrates that under the existing Court ordered stipulation, NCSD must purchase additional imported water from the City of Santa Maria. The UWMP demonstrates that NCSD's groundwater pumping, including the Dana Reserve usage, will be approximately 25% of 2007 groundwater pumping amounts and 30% less than the current 2021 groundwater pumping.

Furthermore, with the inclusion of the Dana Reserve, which will exclusively use the water purchased from Santa Maria in perpetuity, more water will be added to the Nipomo aquifer than removed for the first time in NCSD history. The imported water from Santa Maria used in the homes of the Dana Reserve will percolate into the Nipomo Groundwater Basin through the return flows from the Nipomo Sanitation Plant. The imported water will contribute a new source of water to the basin's recharge portfolio.

## **Study #2: Dana Reserve Project Impact Study – Impact on Water and Sewer Rates –**

<https://ncsd.ca.gov/wp-content/uploads/2022/07/220517-NCSD-Dana-Reserve-Rate-Final-Report.pdf>  
*Study Prepared by Tuckfield and Associates for the Nipomo Community Services District – May 17, 2022*

The NCSD is contractually obligated to purchase additional imported water from Santa Maria, commencing in 2025. This additional purchase of water from Santa Maria is mandated by a Court ordered stipulation. The cost of this imported water is approximately 3x the cost of current ground water pumped from the Nipomo Basin.

The Dana Reserve customers will pay a higher water rate than existing customers because they will be paying exclusively for imported water from the City of Santa Maria. Existing customers have the benefit of a blended water rate made up of groundwater and imported water costs, where groundwater is less expensive to provide. The Dana Reserve will exclusively utilize this more expensive Santa Maria water, reducing the future financial burden the more expensive water will bring on existing customers. Furthermore, the Dana Reserve will also connect to the NCSD Sanitation facility. The NCSD-ordered study indicates an adequate capacity for full build out of Nipomo and the Dana Reserve. The inclusion of the Dana Reserve will allow for existing fixed costs at the sanitation plant to be distributed over a larger number of ratepayers. The rate study estimates NCSD sewer bills will be reduced by 30% once the Dana Reserve is completed.

The study also demonstrates that the NCSD's financial health improves significantly with the Dana Reserve – allowing the NCSD to increase capital reserves.

# DANA RESERVE



## Study #3: Dana Reserve Development Water and Waste-Water Service Evaluation

[https://ncsd.ca.gov/wp-content/uploads/2022/07/Final-Dana-Reserve-Evaluation\\_021622.pdf](https://ncsd.ca.gov/wp-content/uploads/2022/07/Final-Dana-Reserve-Evaluation_021622.pdf)

Study Prepared by MKN & Associates for Nipomo Community Services District – February 2022

The NCSD contracted a study to examine both the infrastructure improvements that will be required as part of the Dana Reserve and upgrades to existing infrastructure that will improve service levels for both existing and new customers.

The Dana Reserve will pay in excess of \$31,000,000 one-time NCSD connection fees and charges to build the necessary infrastructure to serve the development. An additional commitment of \$4,500,000 by the Dana Reserve to NCSD will be dedicated to other needed infrastructure improvements as determined by their Board of Directors.

The study identifies those improvement costs specific to the Dana Reserve will be reimbursed through the developer's payment of connection fees. Payment from the Dana Reserve for its share of existing improvements – those constructed improvements needed to import water from Santa Maria – are included in the connection fees and charges.

# SANTA LUCIAN



**SIERRA CLUB**  
EXPLORE, ENJOY, AND PROTECT THE PLANET

**Santa Lucia Chapter**

Nov./Dec. 2022  
Volume 59 No. 6

The official newsletter of the Santa Lucia Chapter of the Sierra Club ~ San Luis Obispo County, California

## The County Needs to Fix or Nix the Dana Reserve

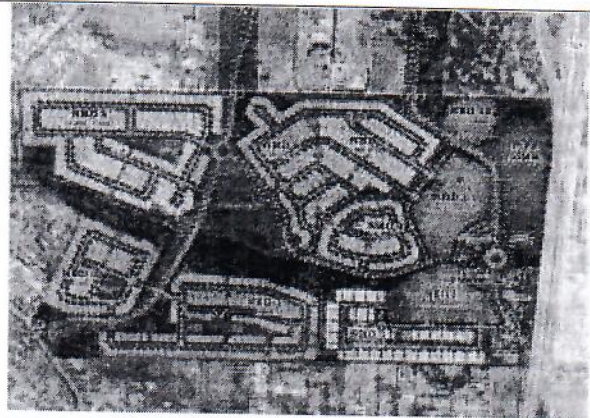
First, there's the name. The "Dana Reserve" is by no stretch of the imagination a "reserve."

Then there's the size. It would be one of the largest housing developments in SLO County history; 1,289 new residential units on 288 acres outside the Urban Reserve Line on the Nipomo Mesa.

Then there are the significant, unmitigable impacts identified in six different categories by the environmental review, including air pollution and greenhouse gas emissions, a widening jobs/housing imbalance (too many people and not enough jobs, thanks to unplanned population growth, contributing in turn to an increase in

Vehicle Miles Traveled (VMT) as new residents drive far from their new homes to commute to their jobs, and the proposed project's impacts to biological resources.

*DANA continued on page 9*



## She Was a Force for Nature

*Comments of California Coastal Commission Executive Director Jack Ainsworth at the Sept. 7, 2022, meeting of the Coastal Commission:*

"And finally, I have some sad news to share. The Coastal Commission lost one of our foundational family members last week: Sara Wan, the longest-serving Coastal Commissioner and former Chair of the Commission, passed away Sunday in Santa Monica.

Whenever I hear the term "Force of Nature," I always think of Sara. She was a tireless defender of the coast who refused to take no for an answer, a brilliant strategist and fierce coastal warrior who never backed down from a fight. But she was also a force *for* nature. She combined her scientific training with her environmental activism and



WAN Conservancy

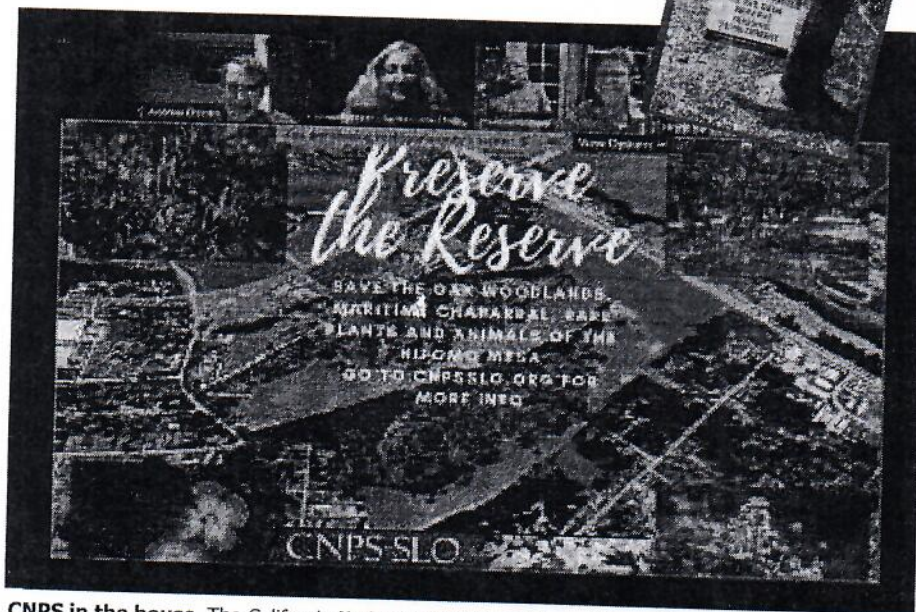
*SARA continued on page 7*

### Inside

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**Dana**

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**CNPS in the house** The California Native Plant Society laid out the problems with -- and solutions to -- the Dana Reserve project at the Sierra Club's Sept. 21 General Meeting.

That last category consists most prominently of the project's promised destruction of 4,000 coastal oaks and chaparral along with the rare and sensitive species of plants and animals that are part of those ecosystems. The mitigation of impacts to oak woodlands is usually, at best, a shell game — *we promise to protect the oak trees over there and/or plant a bunch of saplings in compensation for cutting down the mature oaks over here.* The oak tree massacre that was the Willow Road interchange promised to mitigate that impact by planting thousands of oaks in different locations. Eight years later, with a dismal survival rate, that mitigation project is an unmitigated failure.

The Dana Reserve project doesn't even try to pretend. The draft Environmental Impact Report admits that replacing the oaks and

chaparral would be extremely difficult and likely impossible — a significant, unmitigable impact.

All this and more came up at the Santa Lucia Chapter's Sept. 21 general meeting, where we were pleased to host the SLO Chapter of the California Native Plant Society. We learned that there are 13 species of oak native to California, they grow between 15 and 70 feet tall over 200 years, oak woodlands provide the greatest species variety of any type of vegetation in California, oaks provide food resources for 45 species, and that is the bigger picture of what will be lost if 4,000 oaks are obliterated for the Dana Reserve.

The project designer has tried to argue that the project need not comply with all County policies, just the ones the state of California legally requires in every general plan. And

that might be a trenchant legal argument, except for the fact that the bulk of the Dana Reserve's policy inconsistencies are with the County Land Use Plan and the Conservation and Open Space Element. Land use, conservation, and open space policies are three of the policies the state requires every county to include in its general plan.

Both CNPS and the Sierra Club support a scaled-down version of a discarded alternative project plan — the Burton Mesa Avoidance Alternative, which would avoid the destruction of a coastal oak woodland and substantially reduce air pollutants and greenhouse gas emissions, vehicle miles traveled, and unplanned population growth.

We both agree that the project's promise of affordable housing -- occupying 1.4% of the project site -- is a chimera. CNPS writes, "Trading the unique

bio-logical resources of the Nipomo Mesa for a project that may not achieve affordable housing goals is not a benefit and is not supportable," advocating instead for increased housing density on a smaller footprint.

Last summer, the City of SLO strengthened its affordable housing ordinance and abandoned "affordable by design," the kind of affordable housing promised by the Dana Reserve. Having put its faith in the "affordable by design" concept the City finally rejected it after getting nowhere in a years-long quest to meet its affordable housing goals.

The Final Environmental Impact Report for the Dana Reserve is expected to be released in November. The County Planning Commission will weigh certification of the document in January, and the Board of Supervisors will consider the inevitable appeal of the Planning Commission's decision in April. That schedule is subject to change. Keep your eye on [www.slocounty.ca.gov/Departments/Planning-Building/](http://www.slocounty.ca.gov/Departments/Planning-Building/).

And get involved with the Nipomo Action Committee and its Stop Dana Reserve campaign. These are Nipomo residents who want the County to do its job as spelled out in its general plan policies, and are circulating a petition to that effect. They have gathered over 1,500 signatures to Stop the Dana Reserve Development as Currently Designed. Go to: <https://chnng.it/gw7h7867Dd>

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- Opinion
- Commentaries

January 17, 2023

## Local journalists overlooked an important document for Nipomo's Dana Reserve development

By [Andrew Christie](#)

I've been an environmental activist for a while, which means I've had occasion to be interviewed a time or two. I've also read a lot of environmental reporting. And I've seen All the President's Men, as did just about everyone in my generation who went on to major in journalism and become a reporter.

I am a fan of the men and women of the Fourth Estate. Going out and getting the story, informing the public and thereby helping democracy to thrive, is a noble vocation. So this should be considered a gentle critique.

Lately, the journalistic method often seems to consist of the reporter interviewing subjects involved in the story, making sure the statements of opposing sides are represented in rough proportion, and writing an inevitable variation on he-said, she-said.

I'm sure omnipresent deadlines are a factor in how deeply a story gets reported, not to mention decisions that must be made by editors about how much money to pour into a reporter's quest to dig up everything they can.

But reporters who report on land use issues have an advantage. If they want to go beyond the clash of opinions, they don't need to wear out shoe leather tracking down suppressed memos and filing Freedom of Information Act requests. When a major development project is announced and starts heading for a permit hearing, all the reporter needs to do to get the story, in addition to asking project opponents and proponents what they think, is tap a keyboard a few times and pull up a document called an environmental impact report (EIR).

If a development project were a patient, the EIR would be its full medical history—all the tests, X-rays, full body scans, bone marrow density, and courses of treatment. They tend to clock in close to a thousand pages in length, and some could occupy several feet on a library shelf. The California Environmental Quality Act requires a high degree of thoroughness, and very long and expensive documents are the result. Everything anyone could want to know about the project—how it relates to all other current and proposed development in the area, what its impacts on the environment would be, what mitigation measures could reduce those impacts, and what impacts cannot be reduced by mitigation measures and why—is all there, in granular detail.

And though they look daunting, their indexing is equally thorough, so it's not that hard to get to the section that has the information you need. (And while the environmental consultants who write EIRs may sometimes choose to interpret data in a way that makes an impact seem less harmful and makes life easier for the developer, no environmental consultant has ever massaged the data to make a project look like it will inflict more harm than it actually would.)

Last November, The Tribune in San Luis Obispo published a story on the Dana Reserve development in Nipomo headlined, "SLO County housing development could add 1,289 homes. Why are neighbors opposed to it?" The Dana Reserve is a historically large project, with, as I've noted previously, massive environmental impacts. The story was appropriately long. The reporters interviewed Nick Tompkins, the developer, who is in favor of the project as designed, and local residents opposed to it, and a county planner who likes the idea of fulfilling the county's "above moderate income" housing requirement at one shot. They all made their arguments in roughly equal proportion.

At no point in that long story did the term "environmental impact report" appear. As a result, statements like this simply skated by:

- The developer said "he will mitigate the loss of these oak trees by planting about 1,500 new oak trees on the property, and conserving a tract of oaks on a ridge several miles from the development. He will also preserve 1,552 oak trees already on the property."
- Referring to a much less impactful design alternative, the developer said "the county rejected this plan, however, because some of the homes were too close to the freeway by San Luis Obispo County Air Pollution Control District standards."
- "Critics are also concerned about how the Dana Reserve project would impact traffic." But the developer said he'll implement measures that "will offset many of the circulation problems."
- And "a member of the San Luis Obispo County chapter of the Native Plant Society doesn't agree with Tompkins' conservation methods."

But in fact, those "conservation methods" were analyzed and discarded in the EIR because they won't work. And residents are concerned about how the project will impact traffic because the EIR makes it clear that no amount of mitigating measures would reduce the significance of the project's traffic impacts. And the EIR tells a different story—several, in fact—about why the less impactful alternative design was rejected.

I know that reporters prefer interviewing people and writing down their statements, and this puts the average thousand-page environmental document at a disadvantage. But when reporters have the facts at their fingertips and ignore them in favor of opinions, thereby making opinions sound like facts and vice versa, they are reporting the conflict, but they are not reporting the story.

Andrew Christie is the director of the Santa Lucia Chapter of the Sierra Club. Respond with a letter to [letters@santamariasun.com](mailto:letters@santamariasun.com).



# Dana Reserve environmental impact report details project's footprint on Nipomo oak-studded ranchland

By PETER JOHNSON

The largest proposed housing development in San Luis Obispo County in 25 years would cut down close to 4,000 oak trees, disrupt protected plant and wildlife species, and strain local traffic, among other impacts, according to a draft environmental impact report (EIR) released last month for the Dana Reserve in Nipomo.

The 1,289 single- and multi-family units envisioned as part of the Dana Reserve project are being welcomed by SLO County and some community groups as a much-needed injection of housing supply into the local market, while critics are calling it overly ambitious and environmentally destructive.

First proposed by local development firm NKT Commercial in 2020, Dana Reserve looks to build on a 288-acre site south of Willow Road and west of Highway 101 known as Cañada Ranch. The property has been slated for development for more than a decade, but prior plans never materialized.

While past plans for Cañada Ranch concentrated on commercial uses to address Nipomo's jobs/housing imbalance, the Dana Reserve focuses on housing—its hundreds of proposed single- and multi-family units



RENDERING COURTESY OF SLO COUNTY HOUSING, HOUSING, HOUSING : The 1,289-unit Dana Reserve project released its draft environmental impact report on June 15. On July 14, it will be the subject of an informational study session at the SLO County Planning

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According to SLO County Planning Manager Airlin Singewald, the local and statewide housing shortage caused planners and NKT Commercial to pivot away from the ranch's prior top development priorities of "open spaces uses within the oak woodlands" and "an industrial park for employment," in favor of a denser, residentially focused project.

If approved, Dana Reserve would be the largest housing project to come to unincorporated SLO County since Nipomo's last major development, Monarch Dunes, and its 1,320 units were approved in 1998, according to Singewald.

Dana Reserve's draft EIR—which is open for public comment through Aug. 1 and will be the subject of an informational study session at a July 14 SLO County Planning Commission meeting—highlights seven "significant, unavoidable" impact areas from the project: in growth, population, transportation, land use, greenhouse gas emissions, biological resources, and air quality.

According to the EIR, Dana Reserve would cause the removal of about 75 acres of coast live oak woodland and oak forest on the ranch—close to 4,000 individual trees and about 76 percent of the oaks on the site. The woodland—which covers about 40 percent of the entire project area—"provides important native habitat for plants and wildlife" and "contributes significantly to ... the region's overall biological diversity," supporting eight special-status plants and four special-status nesting birds.

NKT Commercial proposes to mitigate that loss of trees and habitat by dedicating a 388-acre, off-site parcel 2 miles east of the project for permanent conservation and saving about 20 acres of woodland/forest on the Cañada Ranch site. It also proposes to plant "anywhere from 1,500 to 3,000 oak trees" as mitigation. NKT will also have to earn a specific permit from SLO County to remove the trees as part of the county's 5-year-old oak woodland ordinance.

But the EIR emphasizes that the project's off-site conservation property does not contain the same special-status species that thrive on Cañada Ranch and adds that some mitigation efforts may not succeed. The EIR concludes that the project would cause "a significant net loss of oak trees and acreage of oak woodlands in the county."

Other impacts identified in the EIR are tied to the population growth that would follow the development. The EIR states that the size and scope of Dana Reserve is not "specifically projected or planned for in local and regional county planning documents" and would "induce

substantial unplanned population growth in the Nipomo area.” The ensuing impacts from that include higher levels of traffic, greenhouse gas emissions, a loss of rural visual character, and an exacerbation of the community’s jobs/housing imbalance.

One issue that’s not considered a significant and unavoidable impact is water supply. The Dana Reserve, if approved, would get annexed into the Nipomo Community Services District (CSD) territory, and the district would provide the project with water and wastewater services.

According to the EIR, the Nipomo CSD has sufficient water supply to serve the project: It has between 538 and 1,205 acre-feet per year of available water to serve areas outside of its current service boundary. Dana Reserve at full build-out would demand 387 acre-feet per year. According to a NKT Commercial presentation made to the Nipomo CSD in 2020, by the fiscal year 2025-26, the CSD will be “contractually required to increase the purchase of water from Santa Maria by an additional 700 acre-feet.” The developer argues that Dana Reserve’s eventual residents will help share the burden of those costs for all ratepayers.

NKT Commercial owner Nick Tompkins was not available for comment for this story. Public opinion on the project runs the gamut, with some residents and community groups applauding the addition of housing and others calling it too large and impactful.

Peoples’ Self-Help Housing, a nonprofit affordable housing developer that plans to partner with NKT to make one of the project’s 10 neighborhoods all-affordable, wrote in a 2021 comment letter that the project “meets the most critical needs for the community.”

Arroyo Grande resident Angie Mello also wrote to support the project, saying, “We need affordable family housing to both buy and rent. The Dana Reserve does this.” Mello praised the project’s hiking and biking trails, traffic improvements, and proposed integration of a satellite Cuesta College campus on-site.

“I am 100 percent positive that we need to do everything possible to make the Dana Reserve a reality,” Mello wrote.

But other local groups and residents registered their opposition to the project. In letters submitted last year ahead of the EIR, several environmental and civic groups, including ECOSLO, the League of Women Voters of SLO County, and the Coastal San Luis Resource

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Conservation District (RCD) expressed concerns about the project's scope and its possible impact on wildlife, oak trees, and water.

Neil Havlik, a retired natural resources manager for the city of SLO, told the *Sun* following the release of the EIR that he's highly skeptical of the mitigation measures proposed for the loss of the oak forest. He said that the off-site parcel offered for conservation is "a totally different environment" than Cañada Ranch, and noted "we're still left with a net loss of all of those oak trees."

"I'm very concerned as a natural resources person. It saddens me to see [the project is] moving along as it is," Havlik said, adding that he supports a downsized project that integrates the oak woodland. "Do a smaller project and leave the oak trees alone."

*Reach Assistant Editor Peter Johnson from the Sun's sister paper at [pjohnson@newtimeslo.com](mailto:pjohnson@newtimeslo.com).*



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July 23, 2021

Jennifer Guetschow  
County of San Luis Obispo Planning and Building Department  
976 Osos Street, Room 300  
San Luis Obispo, CA 93408

RE: Dana Reserve Tract Map with Conditional Use Permit (SUB 2020-00047) and General Plan Amendment (LRP2020-00007) Scoping Documents

*Transmitted via email:* [jguetschow@co.slo.ca.us](mailto:jguetschow@co.slo.ca.us)

Dear Ms. Guetschow,

The San Luis Obispo Chapter of the California Native Plant Society focuses on the protection of and education about native plant species and their natural habitats in San Luis Obispo County and portions of northern Santa Barbara County. We have reviewed the Notice of Preparation and Initial Study for the Dana Reserve development, proposed for the site known as Canada Ranch in Nipomo. This development contemplates a total of 1,270 new residential units on a 280-acre site outside the Urban Reserve Line in the Nipomo Mesa area. A General Plan Amendment would be required to expand the Urban Reserve Line. Land uses would be changed from Residential Rural to Residential Single Family, Recreation, Residential Multi-Family and Commercial. The developer proposes to dedicate 388 acres offsite as permanent open space to mitigate for impacts. We understand that a Specific Plan is required to adjust the Urban Reserve Line to include the site, and that annexation to the Nipomo CSD is being proposed. A Conditional Use Permit is required under the County Oak Ordinance to remove the oaks as proposed.

CNPS has also reviewed selected portions of the application materials for this project, made available on the County's website, including the Initial Study, Biological Constraints Analysis Report prepared by Althouse and Meade (dated August 2018), and the updated Biological Report dated May, 2021 (hereafter 2021 Report). Thank you for making these reports available to us.

On June 17, 2021, our conservation team was given the opportunity to visit the site. We spent approximately 2 hours on site. We are thankful for the opportunity to visit the site. We have also examined historical aerial photographs and reviewed other information for the project. Based on our review of the project materials and knowledge of the site and the region, we offer the following comments and suggestions. Note that any photographs of the site that we have attached were taken from public roads offsite.

**1. Reduced Project Must be Evaluated**

CNPS would like to register its strong opposition to this project as currently proposed, and we **repeat our request of April 2, 2021 (letter to Board of Supervisors) that a much-reduced alternative to the project be brought forth for co-equal evaluation with the proposed project.** CNPS recognizes that San Luis Obispo County has a housing shortage. However, the

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community of Nipomo should not be expected to bear the brunt of what is a County-wide problem. Therefore, we suggest consideration of a reduced alternative project, for the following primary reasons:

- a) The project threatens thousands (3,430 to be removed according to the 2021 Report) of mature coast live oak trees on a unique dune habitat with destruction, making a mockery of the County's Native Tree Protection Ordinance. The EIR should evaluate the loss and the manner in which any loss is mitigated. As this is some of the last remaining contiguous oak woodlands on the Mesa, the cumulative impact of its destruction should be addressed.
- b) The project puts forth a false mitigation of street tree plantings and off-site conservation of a wooded property (referred to as Dana Ridge), located in an entirely different watershed and ecosystem some several miles away. The EIR should evaluate mitigation in comparison with the imposed mitigation for the adjacent Willow Road project and the intent of the Oak Tree Ordinance, evaluate the proponents proposed mitigation against commonly applied mitigation standards, and evaluate the ecological equivalence of street trees vs. natural habitat. The problems of using coast live oak as a street tree, particularly in regard to natural limb spreading and constant leaf fall should be evaluated in terms of practicality, and also in terms of long-term management goals over the centuries-long life of an oak. As it is possible to redesign this project to minimize loss of oaks through project redesign such as clustering and increased density in a reduced area, such possible reconfigurations should be discussed in the EIR.
- c) The project would significantly impact hundreds of acres of recovering Burton Mesa Maritime Chaparral on site, including several rare and/or special status plants. This natural community is one of the rarest in San Luis Obispo County and is rapidly decreasing on the Nipomo Mesa. The EIR should evaluate losses to this habitat and discuss mitigation.
- d) The project contrasts significantly from surrounding rural residential development. Changing the General Plan to accommodate a massive upzoning should be evaluated in regard to neighborhood concerns.
- e) The project is inconsistent with several County policies, including the current land use designation of Residential Rural; the South County Area Plan recommendation that the oak woodlands on site be *evaluated for preservation*, and the County Land Use Ordinance which includes *as a first priority* in type of uses: "open space uses within the oak woodlands." The EIR should discuss all inconsistencies of this project with the current General Plan.
- f) The project will severely strain the water resources of the Nipomo community (including imported water and groundwater), which in turn demands a full accounting of water need for the entire Nipomo community, not just the Dana Reserve project. The project should analyze both the input provided by the project proponent, input from Nipomo CSD, and the implications of a falling Key Well Index in the light of expected changes in annual rainfall. Input from other significant water users should also be included in the analysis.
- g) The cumulative impacts on water demand from this and other foreseeable projects on the wetlands of Black Lake Canyon and Black Lake would be significant and must be

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evaluated, particularly because those resources have already been severely impacted by lowered water tables. This should be addressed in the EIR.

San Luis Obispo County does not need to trade its unique, irreplaceable and valuable natural resources for the development of housing. The above issues and recommendations for the EIR are discussed further below.

## 2. Environmental Setting

“Knowledge of the regional setting is critical to the assessment of environmental impacts. Special emphasis should be placed in the EIR on environmental resources that are rare or unique to that region and would be affected by the project.” CEQA Guidelines 15125 (c). The proposed project is located on the Nipomo Mesa, part of the dune sheet of the Callendar complex (Cooper, 1967). These dunes contain “Nipomo Mesa” maritime chaparral that has affinities to the rare and sensitive natural community called Burton Mesa chaparral in Santa Barbara County (Davis, Hickson, and Odion 1988), and the Fort Ord sand hills in Monterey County (Griffin, 1978). This is one of the last remaining areas of its type on Nipomo Mesa and in San Luis Obispo County. Due to its unique sand dune nature, there are floral displays that occur adjacent to Highway 101, and the site has provided springtime displays for commuters for years. The County’s Land Use Standards reflect this, as specialized botanical and/or biological studies are required in areas of the Mesa (e.g., Porter Pacific, Green Canyon, and Summit Station areas to name a few) and make specific mention of maritime chaparral. See Section 22.98.070 H (3)f, 22.98.070 H (11)a, and 22.98.070 H (9)e Of the County Land Use Ordinance.

Furthermore, the 4-mile long Black Lake Canyon, located on the Mesa within 2 miles of this project, plays an important part in the greater Nipomo-Guadalupe Dunes Ecosystem due to its hydrologic influence and as an important habitat migration corridor. These resources are unique to this area and must be addressed adequately in the EIR.

## 3. Impact Analysis

### a. Visual Concerns

The project site is visible from Highway 101, Thompson Road, and Dana Foothill Road. Views of the project site from these vantage points should be addressed in the EIR. The impacts of losing one of the last remaining pieces of open space between Santa Maria and Pismo Beach should be evaluated in the EIR.

### b. Biological Resources

*Loss of Oak Trees.* This project proposes to remove over 3,000 mature oak trees on the site, covering approximately 100 acres (2021 Report). This is undoubtedly one of the most significant such clearing efforts in recent County history; certainly the largest that is seeking County sanction. We do not know the age or size ranges of the oaks on site, but a cursory inspection shows considerable variation in both. We understand that some cutting was done years ago for livestock feed and for firewood or charcoal, and the trees then re-grew with multiple trunks. This

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seems to be the case for many but by no means all of the oaks on site. A site history would be helpful in understanding the character and richness of this important area of Nipomo Mesa. We note the Specific Plan (page 3-3) indicates that the site continues to be managed for grazing. **Please provide the site history with regard to grazing in the EIR (numbers and types) and indicate the most recent grazing activity on site. "In recent decades" is not specific enough.**

The project sponsor also announced in a public presentation that, while the project would "impact oaks," it was planned to plant some 1,500 coast live oaks as street trees. This seemed to imply that such planting was suitable as mitigation. CNPS rejects this implication, as it is more than just trees that would be destroyed; it would be an entire, functioning habitat. Please refer to Exhibit A to see the potential contrast between existing site trees and proposed mitigation trees planted for a recent development project in San Luis Obispo.

As discussed above, **the project EIR should develop a reasonable mitigation proposal along the model of the mitigation for the Willow Road extension project of some years ago, with at least the same ratio of mitigation to tree removal (and in similar soils), at a site that can then be dedicated to permanent conservation.**

*Loss Of Maritime Chaparral.* Appropriate detail should be provided in the EIR to explain how the boundaries of the vegetation types were decided upon, and how the particular vegetation types and Alliances (e.g., Coast Live Oak Woodland and chamise-black sage chaparral alliances) were chosen, given the presence of characteristic species such as sand mesa manzanita, mesa horkelia, rush rose (*Crocianthemum*, =*Helianthemum scoparium*), and sand almond (see page 44, 51, 52 of 2021 Bio Report) on the site. The updated 2021 Biological Report identifies coast live oak woodlands (117 acres) and chamise-black sage chaparral (36 acres) alliances as the primary natural communities on site (Table 3, 2021 Report). These communities have Global and State rarity ranks of G5/S4 and G4/S4, respectively. CNPS disagrees with this assessment and therefore requests that the EIR evaluate losses to all impacted vegetation types. It is worth noting that oaks are a common component of the maritime chaparral/coastal scrub mosaic, especially the multi-stemmed oaks seen on this site (Davis Hickson and Odion, 1988).

CNPS requests that the following additional issues concerning Maritime Chaparral be addressed in the EIR. Components of Maritime Chaparral habitat are currently present over a large portion of the site. We believe that the *Arctostaphylos (purissima, rudis)* Shrubland Special Stands (CDFW, 2020), also known as Burton Mesa Chaparral, or a form thereof, are present on site. This is one of the rarest natural communities known in San Luis Obispo County and has a Global rarity ranking of G1 indicating there are less than 6 viable occurrences worldwide and a State rarity ranking of S1, indicating there are less than 6 viable occurrences statewide. These stands are characterized by the presence of sand mesa manzanita (*Arctostaphylos rudis*) in the shrub canopy, along with several other species (Sawyer Keeler-Wolf and Evens, 2009). Page 18 of the initial constraints analysis (and pg. 44 of the 2021 Report) indicates that sand mesa manzanita "is known to occur on sandy soils in maritime chaparral and coastal scrub habitats..." Page 20 of the report (pg. 52 in 2021 Report) also indicates that sand almond occurs in maritime chaparral and coastal dune scrub. Table 1 below presents 2021 observations from 3 locations on the Dana Reserve site relative to the characteristic species of this alliance, in addition to those seen last year in the maritime chaparral at Nipomo Regional Park. Maritime chaparral is further defined

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and characterized by Vasey et al., (2014), and sand mesa manzanita, among other species noted on the site, is included in the maritime climate zone. A Price Canyon variant of Maritime Chaparral is described in the Price Canyon Planning Area EIR (LFR, 2008, now ARCADIS, in the Price Canyon General Plan Update).

Table 1. Characteristic Species of Maritime Chaparral Noted in 3 areas of the Project Site. (Special Status species in **Bold**.)

| Alliance Defining Species<br>(per Sawyer Keeler-Wolf and<br>Evens 2009)              | Dana, Site 5<br>(6-17-21)            | Dana, Site 6<br>(6-17-21)               | Dana, Site 7<br>(6-17-21)               | Nipomo<br>Park (7-28-<br>20) |
|--|--------------------------------------|---|---|------------------------------|
| GPS (degrees)  | Lat 35.049634<br>Long<br>-120.501634 | Lat<br>35.045667<br>Long<br>-120.507005 | Lat<br>35.043953<br>Long<br>-120.501764 |                              |
| Deerweed<br><i>Acmispon glaber</i> ( <i>Lotus<br/>scoparius</i> )                    | x                                    | x                                       | x                                       | x                            |
| <b>Sand mesa manzanita</b><br><i>Arctostaphylos rudis</i>                            | x                                    | x                                       | x                                       | x                            |
| Chamise<br><i>Adenostoma fasciculatum</i>  | x                                    | x                                       | x                                       | x                            |
| California sagebrush<br><i>Artemisia californica</i>                                 | x                                    | x                                       | x                                       | x                            |
| Coyotebrush<br><i>Baccharis pilularis</i>  |                                      | x                                       |   | x                            |
| <b>Lompoc Ceanothus</b><br><i>Ceanothus cuneatus</i> var.<br><i>fascicularis</i>     | x                                    |   |   |                              |
| <b>Nipomo Mesa Ceanothus</b><br><i>Ceanothus impressus</i> var.<br><i>nipomensis</i> | x                                    |   |   |                              |
| Bush monkeyflower<br><i>Diplacus aurantiacus</i>                                     | x                                    | x                                       | x                                       | x                            |
| Mock heather<br><i>Ericameria ericoides</i>  |                                      | x                                       |   | x                            |
| Rush-rose<br><i>Helianthemum</i><br>( <i>Crocyanthemum</i> ) <i>scoparium</i>        | x                                    | x                                       | x                                       | x                            |
| Black sage<br><i>Salvia mellifera</i>  |                                      | x                                       |   | x                            |

These data show that the site, at these specific areas and beyond, based on our observations and analysis, contains the characteristic species of what can be called Burton Mesa Chaparral, or the *Arctostaphylos* (*purissima*, *rudis*) **Shrubland Special Stands**. We also call your attention to a 1994 aerial photograph from GoogleEarth (Exhibit B, Figure 1, attached) wherein the majority of the site can be seen to contain a dense shrub cover intermixed with the oaks on site. The aerial

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signature of this site can be seen to be the same as that of Nipomo Regional Park, which also contains maritime chaparral (Exhibit B, Figure 2). **We request that the EIR thoroughly address the history of the site and assess the present vegetation in light of the current and historical presence of the species listed above on the project site.** CEQA (Section 15125) requires an adequate description of baseline environmental conditions present on the site at the time the NOP is published. The above species are present on site now (See 2021 Report, Table 6) and are characteristic species of the Special Stands identified above, per Sawyer, Keeler-Wolf and Evens (2009). **This must be addressed in the EIR.**

The Nipomo Native Garden, located in the immediate area of the site, refers to Central Maritime Chaparral on its website and also refers to many of the same species found on this site. As noted by its name, this "Nipomo Mesa" maritime chaparral has affinities to the rare and sensitive natural community called Burton Mesa chaparral in Santa Barbara County (Davis, Hickson, and Odion 1988), and the Fort Ord sand hills in Monterey County (Griffin, 1978). It appears to fit best into "Coastal Sand-plains and Stabilized Dunes" recognized by Hoover (1970), which he says is "most extensively developed on Nipomo Mesa."

The County's website (CSS portal, Assessor's Parcel 091-301-073) indicates at least two code enforcement cases based on reports of brush-clearing on the site, one as recently as 2017. The effects of past vegetation management and type conversion of habitat, and the observed natural regeneration of habitat at the site should be examined in terms of evaluating the ecological future of the parcel under different development scenarios.

Impacts identified in the 2021 biological report include the loss of 99 acres of oak woodland and 35 acres of chamise-black sage chaparral, with 18 acres of oak woodland preserved on site. Again, CNPS believes this is an inaccurate characterization of the site vegetation and that an unknown amount of maritime chaparral would be lost as a result of the project.

**The EIR consultant needs to contact CDFW VegCamp staff and identify accepted methods (e.g., CNPS Rapid Assessment protocol) to clarify the existence (or lack thereof) of sensitive natural communities onsite, specifically maritime chaparral.** In addition, we believe this project needs to be completely revamped given the rare plants, rare natural communities, and oak woodlands constraints that are present on the site.

*Loss of Habitat for eight Special Status plant species.* The April 2021 Specific Plan on page 3-4 indicates that "on-site habitat on DRSP occupied by sensitive species will be placed in protected easements. Appropriate off-site habitat will be preserved and/or restored to mitigate for impacts to rare plant species." **This off-site habitat for mitigation of rare plant species needs to be identified in the EIR.** It is not likely that the proposed Tematatte Ridge off-site mitigation area will be an ecologically appropriate location for these plant species with habitat preference for sandy soils of the dune ecosystem.

*Biological Mitigation Proposal.* The applicant proposes to dedicate roughly 388 acres outside the property on which the project would be constructed as permanent open space to mitigate (compensate) for impacts to biological impacts (oak woodlands and chamise-black sage chaparral). The site is located in the upper reaches of Los Berros Canyon, and is only accessible

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via unpaved roads. Ninety-nine percent of the site (shown on Figure 1 of Appendix F of the 2021 Report and Exhibit 3-2 of the April 2021 Specific Plan) is not even visible from Nipomo<sup>1</sup>. The California Native Plant Society does not recognize offsite compensation as mitigation; rather, the Society fully endorses only avoiding the impact (See Appendix A to CNPS Policy on Mitigation Guidelines, 1998). Note that this CNPS Policy does not appear to be characterized correctly in the 2021 Biological Report on pg. 19. First, the 2021 Report references CNPS 2001, and there is no CNPS Mitigation Policy dated 2001. (The link in the references goes to the 1998 Policy.) Secondly, it ignores the Appendix to the Policy which states the above position of endorsing avoidance. Our concerns regarding the proposed off-site mitigation are as follows:

- The mitigation site does not contain the maritime chaparral community that is being impacted by the project; thus it is not “like for like;”
- The mitigation site does not contain the one characteristic species, *Arctostaphylos rudis*, and several other characteristic and/or special status species, that make up the on-site maritime chaparral habitat;
- The mitigation site is in an entirely different watershed from the proposed project site;
- The resources present on the mitigation site are not threatened (the land is zoned Agriculture);
- The mitigation does not compensate for the loss of over 3,000 mature coast live oak trees, nor for the loss of maritime chaparral.

**We reiterate that a reduced alternative that avoids the significant impacts to oaks and adjacent habitat must be addressed in the EIR.**

**c. Land Use and Planning (Policy Inconsistency)**

The Initial Study indicates that the EIR will contain a detailed analysis of project consistency with applicable land use plans. We offer the following to be addressed:

**The Conservation and Open Space Element** identifies "Major Issues" for Biological Resources on pg. 3.5:

- “1) Integrated management approach. Increasing risk of degradation and/or elimination of natural resources requires coordinated and integrated management of the county’s biological resources by public, private, nonprofit, and agricultural organizations at ecosystem and site-specific levels.
- 2) Land use conversion. Changing land uses, particularly conversion of agricultural and rural lands to residential and urban uses, adversely impact species and their habitats.
- 3) Wildlife protection. Changing land uses impact wildlife movement corridors and displaces wildlife.

<sup>1</sup> Note that the map of the Mitigation site presented at the July 19 scoping meeting and in the Initial Study (Figure 1) is different from that shown in these documents. This needs to be clarified. It appears that Fig. 1 in the Initial Study is incorrect.

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4) Oak woodlands. Areas of oak woodlands and native trees are diminishing due to tree cutting, urban land conversion and displacement by exotic/non native species.”

The proposed project clearly produces a further aggravation of these issues, and this should be addressed in the EIR. The environmental review must examine impacts under these 'Major Issues.'

**Section 4.5 of the *South County Area Plan*** (Rural Area Land Use pg. V.4-17) states the following with regard to the Canada Ranch:

“...The property has a large oak woodland that should be evaluated for preservation as a long-term habitat...A specific plan should be accompanied by market feasibility and fiscal impact studies and an environmental impact report **to determine the logical extent and location of development.**”

This implies the EIR is intended to help determine the extent and location of development, and points to the importance of a careful and detailed alternatives analysis in the EIR.

**Section 22.58.010 of the *County Land Use Ordinance*** identifies the purpose and intent of the County's Oak Woodland Ordinance as follows:

“The intent of this ordinance is to maintain the character of the existing landscape and promote oak woodland management independent of regulation.”

Note this says “maintain the character of the existing landscape...” It was not intended to allow for wholesale destruction of oak woodlands just by virtue of requiring a Conditional Use Permit.

**Section 22.98.070 South County Sub-Area Standards, Subsection D**, regarding Open Space preservation, has a cluster subdivision incentive. We note that the County's “info-hold” letter dated July 24, 2020 indicated that “the map is not compliant with 86% of existing oaks to be removed.” The letter goes on to suggest that a cluster design that would reduce these impacts should be considered. **We agree and suggest this be included in the Alternatives analysis of the EIR.**

**Section 22.98.072.H (8) of the *County Land Use Ordinance*** (Canada Ranch) includes as a first priority in type of uses: “open space uses within the oak woodlands.” This section of the LUO also calls for:

“Oak Habitat Preservation. Designation of the existing oak forest habitat for open space preservation, where limited recreational and open space uses may be allowed.”

As noted above, the project proposed to remove 3,430 oak trees and retain 516 (14% of the existing trees). According to the 2021 Report, 99 acres of coast live oak woodland habitat would be removed. This is wholly inconsistent with this policy. Preserving an isolated 388-acre parcel that is inaccessible to the public as mitigation for the loss of oak woodland and chaparral does not meet the intent of this policy.

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In light of the above policy inconsistencies, the EIR must consider alternatives that avoid the inconsistencies and avoid and reduce the significance of these impacts.

**d. Utilities and Service Systems (Water Resources)**

The project site lies within the Nipomo Mesa Management Area (NMMA) of the Santa Maria Groundwater Basin, which has been subject to litigation for years. The availability of water resources will require critical analysis in the EIR, particularly in the expectation of continued drought conditions due to climate change and made evident in current literature.

According to the IS, the total estimated water demand at full buildout is estimated at 336.25 AFY, with a 10% contingency estimated at 369.88 AFY. While the developer argues that it can use as-yet-unallocated water from the Nipomo CSD water imports under the Stipulation and Judgment for the Santa Maria Groundwater Litigation (*Santa Maria Valley Water Conservation District vs. City of Santa Maria, et al.* Superior Court for the County of Santa Clara Case No. 770214), there is no evidence yet presented on the impacts of the water supply and future development on the entire Santa Maria Groundwater Basin. The Stipulation referred to above requires the determination of water shortage condition in the NMMA using the Key Wells Index as criteria as part of the Annual Report. According to the 2020 Annual Report, the Key Wells Index indicated severe water shortage conditions. The import of water through the NCSO pipeline was in part to offset overdraft within that basin, and as the Stipulation does not apply to, or limit, the pumping of overlying property owners such as agriculturalists on the Mesa, the cumulative impacts must be analyzed in the EIR.

Regarding anticipated water supply deficiencies, the County Resource Summary Report of 2016-2018 recommends a Level of Severity III for the Nipomo Mesa portion of the groundwater basin (San Luis Obispo County, 2018).

Black Lake Canyon is a significant ecological resource on the Nipomo Mesa. It provides wetland habitat for two plants listed as Endangered under the Federal ESA, in addition to a number of other wetland-dependent species. These plants are narrow endemics and require water-saturated dune sands as habitat. A study in 1994 (Chipping 1994) showed that the water table in the Black Lake Canyon area is variable, but the wetlands in the lower canyon are drying up. Further degradation of the lower canyon wetlands has the potential to threaten the habitat of each of these plants. The relation of the lower canyon waters to those of the regional aquifer must be addressed and the cumulative impacts on the hydrology and wetlands of Black Lake Canyon and Black Lake should be evaluated in the EIR.

In light of the above situation, **the environmental analysis should include discussion and analysis of the NMMA Key Wells Index and the observations and conclusions of the Nipomo Mesa Management Area 13th Annual Report, Calendar Year 2020 (NMMA Technical Group, 2021).**

**4. Alternatives**

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An EIR must describe a reasonable range of alternatives to the project, or to the location of the project, that could feasibly attain **most** of the basic objectives of the project while avoiding or substantially lessening any of the significant effects of the project, CEQA Guidelines Section 15126.6(a), (f). The proposed project would potentially affect 99 acres of sensitive oak woodland and maritime chaparral habitat, in addition to several special status plant and animal species. The EIR must identify an alternative that avoids these impacts.

**CNPS SLO requests that a much-reduced alternative be evaluated that preserves the majority of the oak trees and maritime chaparral on site and that this alternative be evaluated co-equally with the proposed project.** At a minimum, the EIR should evaluate the following alternatives:

- No project alternative;
- Allowable buildout under the General Plan;
- A clustered development alternative;
- A reduced density alternative;
- Alternative locations for the neighborhoods that reduce their size and impacts to sensitive resources, specifically oak woodlands and maritime chaparral.

Alternative project designs should be evaluated in consideration of the 'Major Issues' for Biological Resources as listed in the County's Open Space and Conservation Element, as discussed above.

We appreciate the County's careful consideration of our concerns in this process. Please include our organization on the list of interested parties for any future notices related to the project. Again, CNPS recognizes that the County has a housing shortage. We do not believe, however, that the County's unique and irreplaceable natural resources need to be sacrificed in order to make progress toward the goal of additional housing. Otherwise, what is the point of living here vs. living in downtown Los Angeles?

Sincerely,

Melissa Mooney  
President

San Luis Obispo Chapter, California Native Plant Society

[mjmoon@charter.net](mailto:mjmoon@charter.net)

[cnpslo.org](http://cnpslo.org)

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Exhibit A

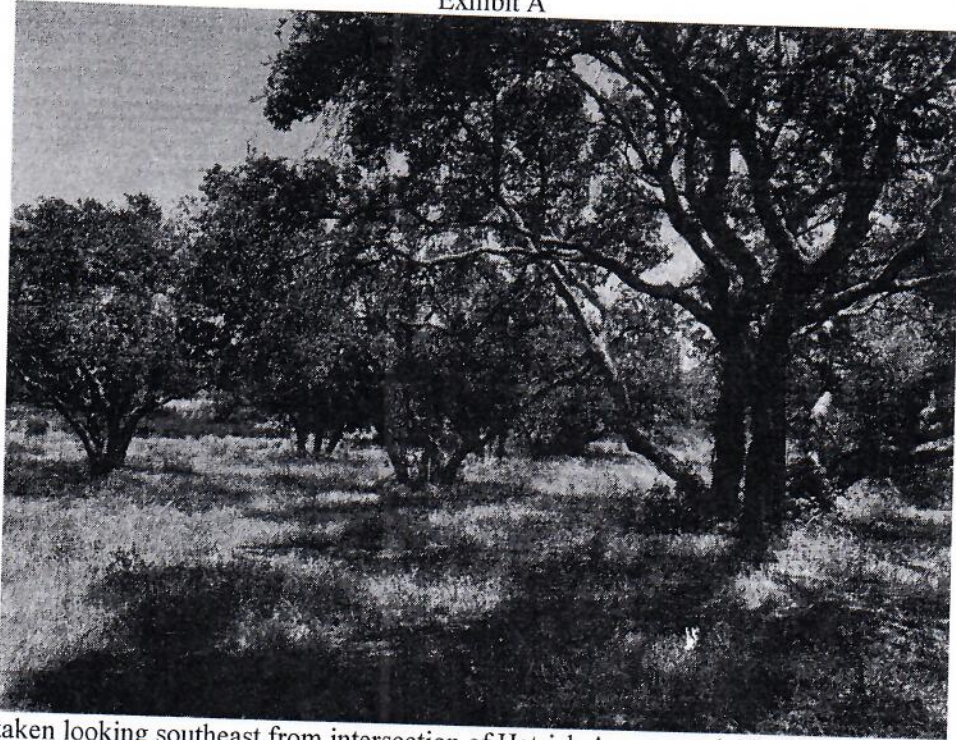


Photo taken looking southeast from intersection of Hetrick Avenue and Glenhaven Place, east of Calimex Pl. These mature oak trees would be removed for proposed Neighborhood 8.

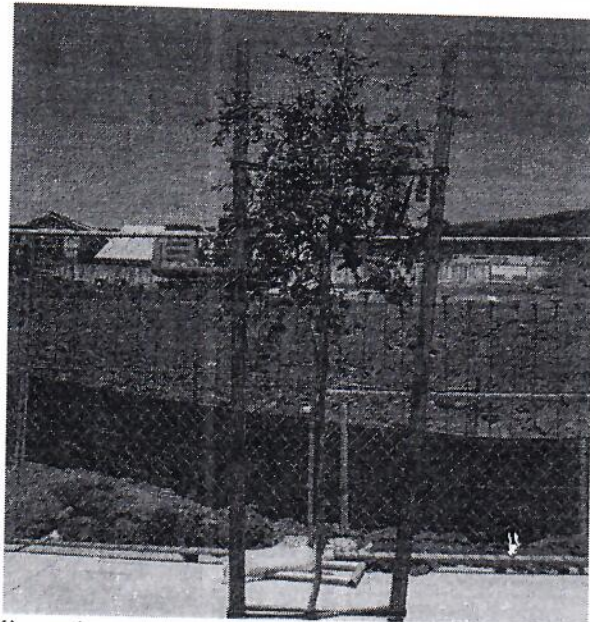


Photo of a small coast live oak street tree at a recent development in San Luis Obispo.

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Exhibit B



Figure 1. 1994 Aerial photo showing Dana Reserve and dense shrubland on site.

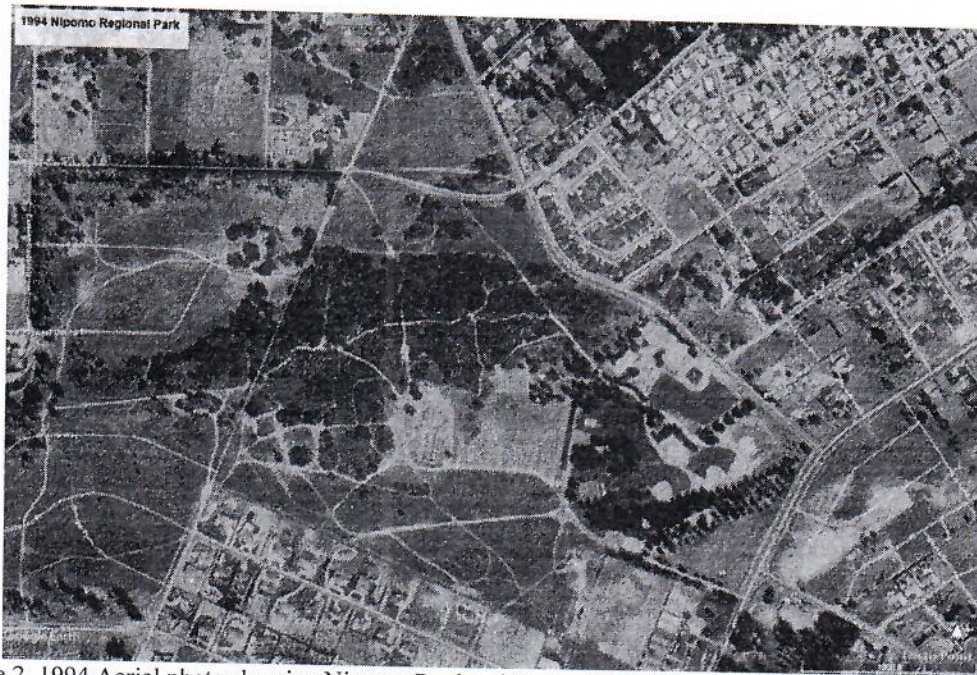
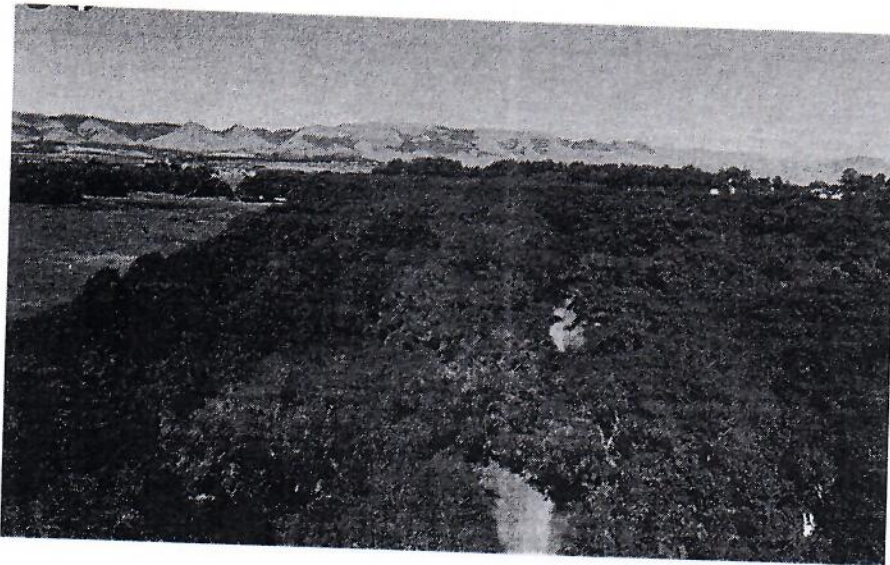


Figure 2. 1994 Aerial photo showing Nipomo Regional Park with similar shrubland aerial signature.

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# Woodsman, Spare Those Trees

Nipomo's iconic oak woodlands are hanging in the balance



Nipomo Action Committee

The Dana Reserve mega-development proposed for Nipomo poses a question, one that arises in the mind of the reader when perusing the project's Environmental Impact Report. The *Tribune* succinctly phrased that question as "What matters more, oak trees or affordable homes?" More precisely, what is worth the sacrifice of oak woodland habitat, sensitive species and air quality, and the worsening of a local "jobs/ housing imbalance" via a massive unplanned population increase?

According to the EIR, this is the answer:

"An overarching goal and vision of the project is to provide affordable-by-design housing geared towards first-time homebuyers and starter homes." This will be achieved by dedicating one of the development's ten neighborhoods—the one on the smallest amount of acreage, occupying 1.4% of the project area—to affordable housing.

The City of San Luis Obispo recently had something to say about "affordable by design" when it was revamping its affordable housing program. As reported last March by the *Tribune*, "...the current policy isn't meeting the housing demands because development incentives that encourage projects with home sizes that are so-called 'affordable by design' don't actually produce homes that are cheap enough for many lower- and moderate-income buyers."

And:

“At their market-rate prices, these ‘affordable by design’ homes are still often out of reach for many working people, even when they’re small, according to city staff and a consultant analysis.”

And:

““We can talk all we want to about trying to build affordable by design, and I have been talking about it for 20 years, but it hasn’t worked”, said Councilwoman Carlyn Christianson. ‘And so that’s why you have deed-restricted, and that’s why we’re having this discussion.... That’s the only thing that really works.’”

But even if you’re a believer in “affordable by design,” the Dana Reserve’s affordable housing would be affordable housing provided by a project that relies on a future rate of annual precipitation that is highly unlikely, while putting pressure on a water supply in a region that is already in Stage 4 drought conditions. It would be affordable housing provided by a project that, per the EIR, will mean “maximum daily operational air pollutant emissions [that] exceed [SLO Air Pollution Control District’s] operational significance thresholds.” (Lousy air quality is not a selling point for potential home buyers). It would be affordable housing provided by a project that will result in “a cumulatively considerable impact to greenhouse gas emissions,” not even including the current and future sequestered carbon lost in the destruction of 4,000 mature oak trees. It would be affordable housing provided by a project that will run counter to the “goals and policies identified within the County of San Luis Obispo General Plan Conservation and Open Space Element, Framework for Planning (Inland), [Land Use Ordinance], and South County Area Plan regarding preservation and no net loss of sensitive biological resources and preservation of rural visual character.”

The inclusion of a small percentage of allegedly affordable housing in the proposed project does not override its impacts to the environment and the economy. (Agriculture also fares poorly in the environmental analysis.) As proposed, the Dana Reserve development illustrates the reason why affordable housing should be an outcome of public policy, not left up to developers, inserted into project proposals for the purpose of persuading elected officials to ignore their project's significant impacts.

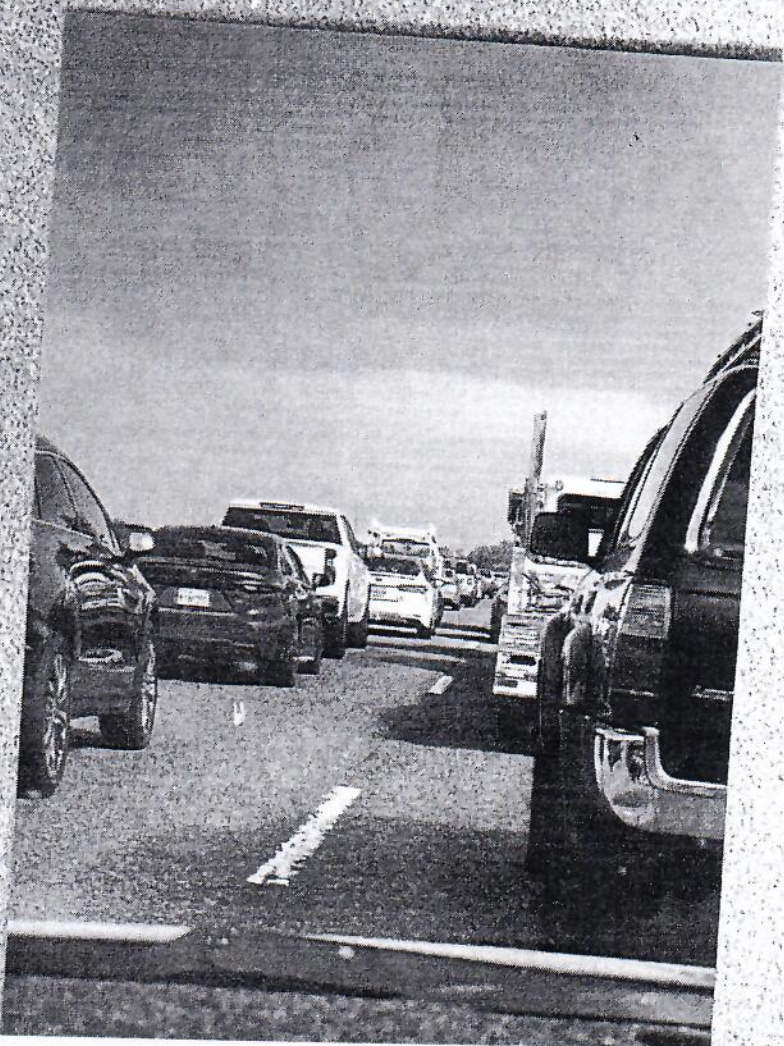
The EIR includes in its analysis a scaled-back project alternative that would substantially avoid the destruction of coastal oak woodland habitat, excessive air pollutants, greenhouse gas emissions, vehicle miles traveled, and unplanned population growth (and for “affordable by design” fans, would still allow for plenty of Additional Dwelling Units, i.e. granny units and tiny homes.) It’s called the Burton Mesa chaparral avoidance alternative, which we have pointed out to the County is the only version of the project it should permit.

The screenshot shows a Change.org petition page. At the top, the Change.org logo is on the left, and navigation links for 'Start a petition', 'My petitions', 'Browse', and 'Membership' are on the right. Below the logo, there are links for 'Petition details', 'Comments', and 'Updates'. The main title of the petition is 'Stop the Dana Reserve Development as Currently Designed'. Below the title is a large image showing a landscape with a sign that reads 'DEVELOPMENT PROJECT BACK IN THE SPOTLIGHT'. To the right of the image, there is a progress bar indicating that 1,044 people have signed, with a goal of 1,500. Below the progress bar, there are several bullet points: 'At 1,500 signatures, this petition is more likely to get picked up by local news!', 'Drew Hagedorn signed 1 hour ago', and 'Melissa DeNash signed 2 hours ago'. At the bottom right, there are input fields for 'First name', 'Last name', and 'Email address'. At the bottom left, it says 'Kally Sleeth started this petition'.

Local residents are sounding the alarm. [Sign their petition here.](#)

(2)

Doc #8



Doc #9

## **“The Central Coast is facing a ‘doctor drought.’”**

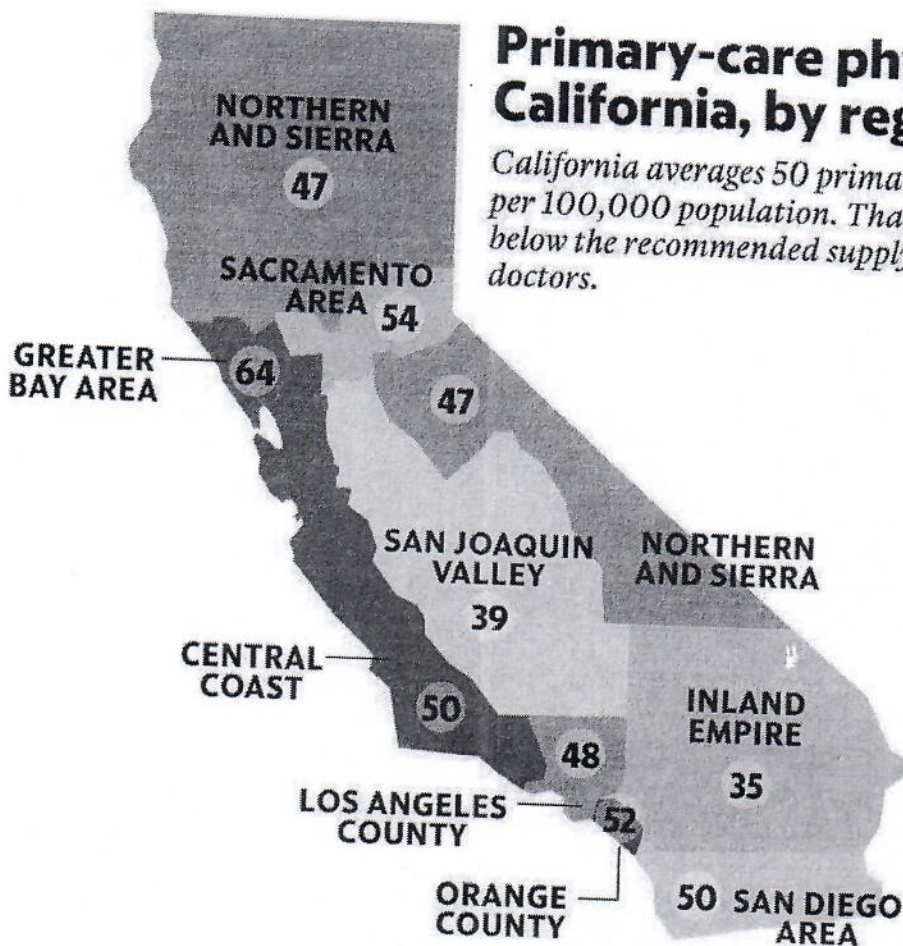
Here are some remedies BY THE TRIBUNE EDITORIAL BOARD MARCH 26, 2019 1:12 PM Nurse practitioner Ricky Norwood talks on Friday, August 24, 2018, about how California's restrictive rules limit the scope of his medical practice.

BY HECTOR AMEZCUA. Think it's tough getting in to see a doctor now? It will only get worse as the population ages and needs more medical care. Remember, too, that doctors are growing older right along with the rest of us; more than a third of the state's healthcare professionals are over 55, so prepare for a wave of retirements. If we don't step up recruitment and training, California will be short 4,100 primary care doctors in 10 years, according to a newly released study by a statewide commission. That should be wake-up call for the Central Coast, which already is medically underserved. The Central Coast now has 50 primary care physicians per 100,000 people; the recommended number is between 60 and 80 per 100,000 people though only one region — the Bay Area — is within that range. When it comes to specialists, there are 93 per 100,000 people on the Central Coast. That's within the recommended range of 85 to 105, but below the statewide average of 104. And with its large population of retired residents on the Central Coast who need more medical care, those numbers should be on the higher side of the recommendations. The California Future Health Workforce Commission, co-chaired by UC President Janet Napolitano and Dignity Health President and CEO Lloyd Dean, has a plan to close the state's medical workforce gap by 2030 — just a little over 10 years away. It's an ambitious plan, and with 27 separate recommendations that would cost \$6 billion to implement, it's going to be a heavy lift. But this also is a rare opportunity to retool California's medical work force to more closely resemble our diverse population.

Read more at: <https://www.sanluisobispo.com/opinion/editorials/article228388984.html#storylink=cpy>

# Primary-care physicians in California, by region, 2015

California averages 50 primary-care physicians per 100,000 population. That number is well below the recommended supply of 60 to 80 doctors.



SOURCE: California Physicians: Quick Reference Guide, CHCF, 2017



# HIGHER EDUCATION WITHIN REACH AT DANA RESERVE

Cuesta College has been searching for a suitable south county satellite location for over 20 years.

Offering a satellite campus in the south county creates access for more students that otherwise may not attend due to lack of transportation options.

The Dana Reserve Specific Plan includes a 4-acre improved parcel that was donated for a South County Satellite Campus for Cuesta College classes. The improvements include grading, curb, gutter, sidewalk, and utilities.

This campus will significantly reduce commute times for south county students. The reduction in daily commutes lowers greenhouse gas emissions and will help to relieve congestion at the Shell Beach straights.

The Dana Reserve will also include two transit stations, creating transportation options for Cuesta students and employees. Again, creating more access to classes and reducing costs and greenhouse gases.

The Dana Reserve Specific Plan includes a non-profit day care facility near the Cuesta satellite campus, creating more opportunities for parents with young children to attend classes and childcare options for Cuesta College employees.

With a satellite South County Cuesta Campus, it is expected that more south county high school seniors will take advantage of the Cuesta Promise.

In addition to the benefits of a south county satellite campus for Cuesta College, the workforce housing is significantly important to the future of the 1100 members of the Cuesta workforce. Adding to the workforce housing supply will assist Cuesta in attracting and retaining talented employees.

The satellite campus will expand opportunities for dual enrollment students to take additional college classes, enrichment and continuing education classes will be offered at the south county location.

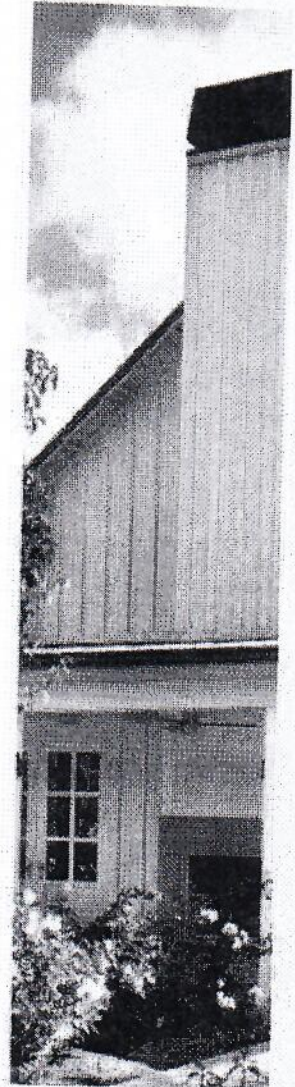
# DANA RESERVE

**Rooted in Central Coast culture.  
Committed to Nipomo's future.  
Dana Reserve.**

**N**

Nearly 200 years ago, Captain W.G. Dana founded Nipomo with a vision for creating a wonderful home for his family, where they would live, work and enjoy the vast natural beauty of the area. Today, a fourth-generation descendant of Captain Dana, is committed to continuing the traditions of his ancestor through the master-planned community, Dana Reserve. Dana Reserve will be developed with the people of Nipomo in mind. Here, locals will find the Central Coast lifestyle, culture, heritage and the exceptional natural resources of Nipomo are all carefully preserved for future generations.

Dana Reserve is designed to showcase Nipomo's natural beauty, while simultaneously providing affordable homes for local residents. Both citizens of Nipomo and residents of Dana Reserve will enjoy access to extensive horse, bike and walking trails, as well as several parks and play areas. In addition, Dana Reserve will provide Nipomo residents with the added benefits of a new community college campus and daycare center, a fire station location, a high-speed fiber network, and more.



Stay Informed and Join our Interest List

To learn more about Dana Reserve and all the exciting plans for this wonderful community, visit our website and sign-up for our interest list.

Priority will be given to those already living or working in Nipomo or those who can demonstrate reduced vehicle miles traveled by relocating to the Dana Reserve.

LiveDanaReserve.com



June 26, 2023

San Luis Obispo County LAFCO,

1042 Pacific St. #A  
San Luis Obispo, CA 93401

I am writing to express my concern regarding the Proposed Dana Reserve Project, a housing development project that will build over 1,289 houses on 288 acres of natural habitat and contribute to significant urban sprawl on the westside of Nipomo.

The Draft Environmental Impact Report (DEIR), determined there are 6 Significant Class 1 Impacts that cannot be mitigated by the developer along with many other additional impacts. The impacts that concerns me most are checked below:

- |  |  |
|--|--|
| <input checked="" type="checkbox"/> Population and Housing     | <input checked="" type="checkbox"/> Traffic                                    |
| <input checked="" type="checkbox"/> Air Quality/Greenhouse Gas | <input checked="" type="checkbox"/> Water                                      |
| <input checked="" type="checkbox"/> Biological                 | <input type="checkbox"/> Public Facilities                                     |
| <input type="checkbox"/> Small commercial component            | <input type="checkbox"/> Aesthetics  |
| <input checked="" type="checkbox"/> Noise                      | <input checked="" type="checkbox"/> Other <u>Public Safety/Quality of Life</u> |

My comments on the project are detailed below:

The un-mitigatable effects of this project are of significant concern to myself and many of my neighbors.

In addition, Air Quality will be negatively impacted by the removal of nearly 4,000 oak trees or even several hundred would deteriorate air quality, such as a wind barrier to screen dust from Oceano dunes.

I have asthmatic conditions which would be exacerbated by this project over my lifetime as a resident.

In my eleven years of being a resident, I have enjoyed the green space and quiet surroundings during daily walks of which I pick up occasional litter to keep our community clean. Adding thousands of people will increase pollution, litter and noise negatively impacting our rural quality of life as well as public safety.

The limited social and economic benefits of the Dana Reserve Project will not outweigh the many significant impacts of the project. As a citizen of Nipomo, I ask that this project be denied until revised to such an extent that the impacts of the development are greatly decreased. We owe it to Nipomo to present a project that does not significantly decrease the quality of life for existing residents and retains the natural beauty of the land given to Captain Dana in 1837.

DATE: June 26, 2023

SIGNED: 

Email: lcoops06@gmail.com

Phone: 661-916-5913

Address: 785 Bracken Lane, Nipomo, Ca 93444

To whom it may concern:

Re: Dana Reserve

I would like to ask you to please consider when you vote to not approve the development of the Dana reserve project.

I am concerned about the negative impact with traffic and growth and how it will be disrupting and destroying our quiet rule environment.

My name is Cheryl Harrison and I live at 857 Inga Rd. in Nipomo, California and I have lived here for 22 years. We moved to Nipomo for the quiet, rural environment so we could have our horses on our property and enjoy the riding trails they had to offer. This project will have negative effects for my street with increased heavy traffic on Pomeroy which will make it difficult for me to walk across Pomeroy safely to walk my horses to the native gardens and also make it very difficult when I drive my truck to get out of my street with this increased traffic to enter onto Pomeroy!

Another consequential concern of mine will be the night sky and pollution into the environment of the harmful and poisonous effects on our air quality with this increase of more homes and build out with the increased traffic!

This is a personal reason for me because I have asthma so breathing polluted air makes it difficult to breathe. Clean unpolluted air quality does matter for being able to breathe fresh air for myself!

I am a ride Nipomo horse group member and this growth will have a negative effect on the safety of riding our horses on the few trails that are available to equestrians in this unique rule area.

I am also saddened with regret that this impact will affect our precious, treasured wildlife and beautiful oak tree Woodlands and Manzanita. I enjoy our wildlife in this area which consists of many owls which nest in the oak trees, our beautiful red tail hawks, quail, cottontail bunnies, and Jack rabbits and coyotes. There has also been several sightings of mountain lion and bobcats in this area! When you destroy their habitat of their natural home and their environment where will they go? They will not have a choice or option of another place to relocate!

Perhaps this development could find a different location which does not involve destroying acres of a large beautiful oak tree Woodland and manzanita, and our precious, treasured wildlife. Maybe a different location would be better suited so that we will not be destroying and damaging the existence of this beautiful environment already established for our wild life!  
If you take this beautiful environment away from the wild animals it can never be replaced!

I would ask that you please consider when you vote, that you do not approve this Dana reserve project. It is disheartening to know that the character of our rule community will be disregarded in your decision of approving this project!

Sincerely,

Cheryl Harrison



Dear LAFCO

I am a resident of Nipomo, and will be living close to the proposed project "Dana Reserve."

Here are my concerns with the Dana Reserve Project:

1. Housing density- changing land zoning from rural residential to single family or multi-family residential. There are concerns from myself and neighbors adjacent to this project that have livestock and roosters, chickens, etc. so close to this development. Air quality, noise pollution and effects of greenhouse gas emissions are a concern with the planned housing density.
2. Land planning- Many of the project plans are out of alignment with the south county area plan. The preservation of oak trees and open space uses was to be the first priority. If we consider alternatives, better land planning and conservation of protected plant species reduces the overall impact for the oak woodlands and chaparral.
3. Biological impacts-Over 3,900 oak trees would be removed, federally endangered species, and special habitats removed, as indicated in the draft EIR. This will undermine the existing Oak Tree Ordinance for all future developments to come.
4. Water- Although NCS D has assured water should be adequate for this project, the past drought situation for California makes water reliability for the future supply a concern.
5. Transportation- All amenities for Nipomo are accessed by way of Teft Street. The Nipomo Swap Meet on North Frontage and Mary Street causes huge backups on Sundays. There are no additional improvements planned for this area and the additional 4,000 plus people travelling to businesses or the freeway will just add to the congestion already evident. The Highway 101 will be impacted as well, with people commuting north or south for jobs or services.
6. Schools- The EIR states that Nipomo High School is already at capacity and buildout of the Specific Plan Area would further impact this community. D. Lange Elementary doesn't have the capacity to accommodate the student increase expected if the Dana Reserve Project goes through, and most likely students would be shifted to Nipomo Elementary which would contribute to more traffic and congestion of Teft Street.

The conditions of this project do not benefit Nipomo as proposed. These six concerns listed above are voiced by the majority of Nipomo's residents who oppose this project. I would suggest that you consider postponing any decisions until these concerns are fully addressed.

Sincerely,

*Janet McGuire*

June 1, 2023

LAFCO  
1042 Pacific ST #A  
San Luis Obispo, CA 93401

Dear LAFCO,

I am writing to express my concerns about the proposed Dana Reserve housing project (1300 homes). As a 15 year resident of the Nipomo community, I believe it is my right and responsibility to voice concerns and advocate for the preservation of Nipomo's well-being and sustainability.

Large expansion with an estimated 25% increase for the Nipomo population without adequate consideration for the existing infrastructure , natural habitats and the social fabric of our small town can lead to a host of challenges.

### **Overcrowded Schools**

As a parent volunteer for six years at Dorothea Lange Elementary, I can see an immediate concern for overcrowded schools. An addition of many families moving into this area can quickly overwhelm the three existing elementary schools, leading to overcrowded classrooms, stretched resources, and a decline in the quality of education.

In an overcrowded classroom, teachers will struggle to provide individual attention and support to each student which limits addressing individual learning needs and feedback. In addition, a crowded environment increases distraction from classmates, movement, and noise that disrupts learning, decreases focus and impedes overall classroom management.

Inequality in education in an overcrowded classroom is a concern. Students from disadvantaged backgrounds who may require additional support...special education, language barriers, or learning difficulties may find it particularly challenging to receive attention and accommodations they need to thrive academically.

Without plans to build another elementary or middle school in Nipomo, the undertaking of residential expansion will have a negative impact on children's education in our community.

### **Traffic**

I often commute to Santa Barbara county for work. An influx in residents on the few two lane roads will result in severe traffic congestion and road safety. In the absence of sufficient roads, increased traffic volume will lead to longer commuting times, decreased accessibility, and heightened risk of accidents. With no expanded road networks planned , road congestion will impact local businesses , emergency services, and the overall quality of life for Nipomo residents.

### **Compromised Safety Measures:**

An increase in population (Dana Reserve & Trilogy) requires corresponding expansion in public safety resources to ensure timely response to emergencies. Currently Nipomo has one fire station and no county law enforcement station. Neglecting to account for these critical services jeopardizes the safety

and well-being of residents resulting in longer response times and inadequate protection for the community.

**Destruction of Oak Trees**

In the case of cutting down oak trees, the loss is not only aesthetic but also ecological. Oak trees are revered in SLO county. They provide essential habitat for various species, contribute to local biodiversity, and help mitigate climate change by absorbing carbon dioxide. The destruction of this natural habitat disrupts the delicate balance of ecosystems, leading to a loss of wildlife and decreased air quality.

While development is essential for the growth of San Luis Obispo County, it must be undertaken with careful consideration . It is vital that we prioritize sustainable development and the preservation of our rural character, while also ensuring adequate provisions for essential services.

Thank you for your attention to this matter.

Sincerely,



Irene Woo