GENERAL PLAN AND LOCAL COASTAL PLAN UPDATE ENVIRONMENTAL IMPACT REPORT – CALIFORNIA ENVIRONMENTAL QUALITY ACT FINDINGS AND STATEMENT OF OVERRIDING CONSIDERATIONS

PROJECT DESCRIPTION AND OBJECTIVE:

The proposed City of Pismo Beach General Plan and Local Coastal Plan Update (GP/LCP Update or project) includes updates to the Land Use, Safety, Conservation and Open Space, Noise, and Circulation Elements of the City's 1992 GP/LCP. The GP/LCP Update does not include updates to the Parks, Recreation, and Access Element and Housing Element. The Design, Facilities, and Growth Management Elements are being eliminated and incorporated into the other elements. With the GP/LCP Update, the City GP/LCP will consist of the following seven elements: 1) Circulation, 2) Conservation and Open Space, 3) Housing, 4) Land Use and Community Design, 5) Noise, 6) Parks and Recreation, and 7) Safety.

The GP/LCP Update presents the community's vision for Pismo Beach through the GP/LCP horizon (year 2040). The land use classifications included in the GP/LCP define the basic categories of land use allowed in the City and are the basis for the zoning districts established in the City Municipal Code, which contain more specific regulations and standards governing development on individual properties. To maintain consistency with the GP/LCP Update, the project includes a Zoning Code Update which includes the Coastal Implementation Plan. Please refer to Section 2*, Project Description*, of the July 2023 Final Environmental Impact Report (EIR) for a detailed project description.

The GP/LCP Update vision and guiding principles, and thus the project objectives, are contained in the Land Use and Community Design Element and are described in detail Section 2.4.1, *Objectives of the GP/LCP Update,* of the July 2023 Final EIR. The GP/LCP Update sets the guiding planning and land use principles for the City. The following vision has been reconfirmed for Pismo Beach that serves to guide the GP/LCP Update:

- Provide a safe place
- Maintain the City's small beach town character
- Manage growth effectively
- Enhance a vibrant tourist-based economy, while becoming a world-renowned tourist destination

The GP/LCP Land Use and Community Design Element has been drafted to implement the community vision through its goals, policies, and actions, which are built around the following GP/LCP Update guiding principles:

- Preserve the historic ambiance of Pismo Beach
- Support the visitor population while enhancing the quality of life for all residents
- Manage growth effectively
- Preserve and protect natural resources

Another objective of the GP/LCP Update is to ensure that the City's land use plan meets the fair share housing needs allocation established in the San Luis Obispo Council of Governments (SLOCOG) Regional Housing Needs Plan (RHNP).

OVERVIEW OF FINDINGS:

The GP/LCP Update EIR, consisting of the January 2022 Draft EIR and the July 2023 Final EIR, including all appendices, and identified significant impacts associated with project approval. Approval of a project with significant impacts requires that findings ("findings") be made pursuant to the California Environmental Quality Act (CEQA; California Public Resources Code Sections 21000 et seq.) and CEQA Guidelines (California Code of Regulations, Title 14, Chapter 3) Sections 15043, 15091 and 15093. Significant impacts of the project would either: 1) be mitigated to a less than significant level pursuant to the mitigation measures identified in the EIR or 2) have a residual significant impact, mitigation measures notwithstanding, that requires a Statement of Overriding Considerations. Specifically, CEQA Guidelines Section 15091 requires lead agencies to make one or more of the following written findings with regard to the project's significant impacts:

- *Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the final EIR.*
- *Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the findings. Such changes have been adopted by such other agency or can and should be adopted by such other agency.*
- *Specific economic, social or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measure or project alternatives identified in the final EIR.*

These findings accomplish the following:

- Address the significant environmental effects identified in the EIR for the project;
- Incorporate by reference all mitigation measures associated with these significant impacts identified in the EIR
- Indicate whether a significant effect is avoided or reduced by the adopted mitigation measures to a less-than-significant level, or remain significant and unavoidable, either because there are not feasible mitigation measures or because, even with implementation of mitigation measures, a significant impact will remain; and,
- Address the feasibility of all project alternatives identified in the EIR.

Because the GP/LCP Update EIR identified impacts that will remain significant and unavoidable, a Statement of Overriding Considerations is also presented. The conclusions presented in these findings are based on the Final EIR and other evidence in the administrative record.

CEQA Guidelines Section 15364 defines “feasibility” to mean “capable of being accomplished in a successful manner within a reasonable period of time taking into account economic, environmental, legal, social and technological factors.”

“Feasibility" under CEQA encompasses "desirability" to the extent that desirability is based on a reasonable balancing of relevant economic, legal, social, technological and/or other considerations. Thus, an agency's decision-makers are free to reject proposed mitigation measures and/or alternatives that they consider undesirable from a policy standpoint, provided that any such decision reflects reasonable balancing of relevant policy considerations, and that appropriate findings are made to that effect. Further, factors to be considered when defining project alternatives include economic viability, availability of infrastructure, and general plan consistency.

To the extent that these findings conclude that the proposed mitigation measures outlined in the EIR are feasible and have not been modified, superseded, or withdrawn, the City of Pismo Beach hereby binds itself to implement the mitigation measures. The mitigation measures are not merely informational but constitute a binding set of obligations that will come into effect when the City of Pismo Beach, acting as the Lead Agency, approves the GP/LCP Update. The mitigation measures identified as feasible and within the City's authority to implement become express conditions of approval which the City binds itself to upon project approval (Public Resources Code Section 21081.6[b]). The City of Pismo Beach, upon review of the Final EIR, which includes the Draft EIR, and based on all the information and evidence in the administrative record, hereby makes the findings set forth herein.

CEQA PROCESS OVERVIEW:

The City of Pismo Beach is the lead agency for the GP/LCP Update. All issues included in Appendix G of the CEQA Guidelines were examined in the EIR. The City distributed a Notice of Preparation (NOP) of the EIR (State Clearinghouse [SCH] # 2021010158) for a 30-day agency and public review period starting on January 15, 2021 and ending on February 15, 2021. The purpose of the NOP was to inform other public agencies, interest groups, and the public in general of the City's intent to prepare an EIR. The NOP also provided an opportunity for those interested in the GP/LCP Update to comment on the contents of the proposed EIR. The NOP was also sent to the SCH, which is responsible for forwarding it to State agencies that might be affected. In addition, as required by CEQA Guidelines Section 15082(c)(1), the City held a virtual EIR Scoping Meeting on January 28, 2021. In addition to the required CEQA Scoping Meeting, the City held a virtual workshop, focused on the Zoning Code and Implementation Plan, on February 25, 2021. On April 27, 2021, the City Council and Planning Commission also held virtual a Special Joint GP/LCP Update Workshop.

Additional City Council and Planning Commission study sessions were held on March 29, May 26, June 30, July 28, and August 25, 2022 and January 31, March 23, and April 27, 2023. The City issued a Notice of Availability and Notice of Completion of the Draft EIR and circulated the Draft EIR (titled "Pismo Beach General Plan/Local Coastal Plan Update Draft Environmental Impact Report") from February 1, 2022 to March 18, 2022 for a 45-day public and agency review period from pursuant to the requirements of CEQA Guidelines Section 15105(a). Three comment letters were received on the Draft EIR, and responses to comments are provided in Section 7 the Final EIR. The Final EIR was completed and released on July 14, 2023

ADMINISTRATIVE RECORD:

The environmental analysis provided in the Draft EIR, Final EIR, and the findings provided herein are based on and are supported by the following documents, materials and other evidence, which constitute the Administrative Record for the GP/LCP Update, and are hereby incorporated by reference:

1. GP/LCP Update, including the Land Use, Safety, Conservation and Open Space, Noise, , and Circulation Elements
2. All public notices issued by the City in relation to the EIR, including the January 2021 NOP, comments received on the NOP, and the February 2022 Notice of Availability (NOA) of the Draft EIR.
3. The January 2022 Draft EIR, including all associated references, appendices, and technical materials cited in the document;
4. The July 2023 Final EIR, including comment letters received on the Draft EIR and the responses to those comments, and all associated references, appendices, and technical materials cited in the Final EIR;
5. Mitigation, Monitoring, and Reporting Program (MMRP)
6. Minutes, transcripts, and recordings of the discussions regarding the project and its environmental impacts at the scoping meetings, public meetings, and public hearings held by the City of Pismo Beach for the project; and
7. Staff reports associated with Planning Commission and City Council meetings on the project and written and oral testimony submitted at these meetings.

The City Clerk is the custodian of the Administrative Record. The public notices, GP/LCP Update, the Draft EIR, and the Final EIR are available for review online at https://pismobeach.org/901/General-PlanLocal-Coastal-Plan-Update. All other materials that constitute the Administrative Record relied upon to support the decisions related to the project are located at the City offices at 760 Mattie Road Pismo Beach, CA 93449.

DOCUMENT ORGANIZATION:

The findings are organized into the following sections:

1. Findings Associated with Impacts Found to be Less than Significant or No Impact without Mitigation

2. Findings Associated with Significant, Potentially Significant, and Cumulative Significant Impacts that Can Be Mitigated to a Less-than-Significant Level
3. Findings Associated with Significant Impacts that Cannot Feasibly Be Mitigated to a Less-than-Significant Level
4. Findings Regarding Alternatives
5. Significant Irreversible Environmental Effects; Growth Inducement.
6. Statement of Overriding Considerations for Significant and Unavoidable Impacts

Note: The MMRP as required by CEQA (Public Resources Code Section 21081.6[a][1]) and CEQA Guidelines Section 15091(d), is attached as Exhibit 1 to these findings and is incorporated herein by reference. The MMRP identifies impacts of the proposed project, corresponding mitigation, designation of responsibility for mitigation implementation, and monitoring actions.

Findings Associated with Impacts Found to be Less than Significant or No Impact without Mitigation

Certain impacts were found to not be significant or to have no impact due to the inability of a project to create such impacts, the absence of project characteristics producing effects of this type, or due to the absence of certain environmental characteristics or resources within the City. The City of Pismo Beach, having received, reviewed, and considered the entire record, both written and oral, related to the GP/LCP Update and Final EIR, finds that the following impacts would not be significant adverse impacts or would create no impact and therefore no additional findings are needed.

Aesthetics

Impact AES-1 Compliance with the GP/LCP Update policies, zoning code, downtown strategic plan and the Shell Beach Design Standards and Guidelines would protect visual and aesthetic resources in the City, such as scenic vistas and scenic resources, from potential aesthetic impacts resulting from development facilitated by the GP/LCP Update. Impacts to scenic vistas and scenic resources would be less than significant.

Impact AES-2 Compliance with existing standards and GP/LCP Update goals, policies, and actions would ensure that new development and redevelopment complements the existing visual character and quality of Pismo Beach, and does not conflict with zoning and regulations governing scenic quality. Impacts to visual character and quality would be less than significant.

Impact AES-3 New development facilitated by the GP/LCP Update would be subject to regulations in the City's Zoning Code, and GP/LCP Update policies, to protect skyward nighttime views and to lessen or prevent glare. Impacts to daytime and nighttime views from new sources of light or glare would be less than significant.

Cumulative Impact Compliance with City and County policies and standards for the protection of visual resources, compatible design for new development, maintaining visual character, and preserving dark skies would ensure that the combination of forecasted development in the City and planned development in neighboring communities would not result in substantially different visual environment than currently exists. Cumulative impacts associated with changes in the visual environment would be less than significant and the GP/LCP Update's contribution to these impacts would not be cumulatively considerable.

Agriculture and Forestry Resources

No Impact The City of Pismo Beach does not contain Prime Farmland, Farmland of Statewide importance, Unique Farmland or Farmland of Local Importance. The City also does not contain any forest or timberland. The GP/LCP would not convert or conflict with existing zoning for agricultural resources, forest, or timberland in the City. No impacts related to agricultural or forestry resources would occur as a result of the GP/LCP Update.

Air Quality

Impact AQ-3 The GP/LCP Update to the conservation and open space element includes policies intended to minimize adverse effects associated with Toxic Air Contaminants through local actions and interagency coordination. The GP/LCP Update would not generate levels of traffic that would expose sensitive receptors to substantial pollutant concentrations or result in new development that would expose sensitive receptors to hazards associated with naturally occurring asbestos. Impacts to sensitive receptors from substantial pollutant concentrations would be less than significant.

Impact AQ-4 Implementation of the GP/LCP Update would not create objectionable odors that would impact a substantial number of people. Future development in Pismo Beach would be required to comply with SLOAPCD regulations prohibiting nuisance emissions, including odors.

Impacts from other emissions, including odors, would be less than significant.

Biological Resources

Impact BIO-1 New development facilitated by the GP/LCP would occur as redevelopment and infill within developed areas of the City, not in existing Open Space, and could result in isolated impacts to special status species, habitat for special-status species and migratory bird nest sites. However, such new development would be required to comply with existing regulations and implementation of the GP/LCP Update policies designed to avoid and reduce any such impacts. Impacts to special status species, habitat for special status species and migratory bird nest sites would be less than significant.

Impact BIO-2 The GP/LCP Update would facilitate development that could result in construction within riparian habitat, and direct placement of fill in wetlands. However, such new development would be required to comply with existing regulations, and implementation of GP/LCP Update polices designed to avoid and reduce any such impacts. Potential impacts to riparian habitat, sensitive natural communities, drainages, wetlands or other aquatic habitats would be less than significant.

Impact BIO-3 Development facilitated by the GP/LCP could result in construction within streams and associated riparian zones that serve as wildlife movement corridors. However, such new development would be required to comply with GP/LCP policies preserving streams, wetlands and wildlife corridors and open space. Impacts to wildlife movement corridors and native wildlife nursery sites would be less than significant.

Impact BIO-4 Development facilitated by the GP/LCP Update may result in the removal of trees. However, the GP/LCP policies require new development to comply with the City's Tree Ordinance, and other applicable City Codes. Impacts to biological resources would be less than significant as the GP/LCP update would not conflict with applicable local policies and regulations to protect biological resources.

Impact BIO-5 Development facilitated by the GP/LCP Update would not conflict with an adopted Habitat Conservation Plan, Natural Community Conservation Plan or other approved local, regional or state habitat conservation plan. Impact would be less than significant.

Cumulative Impact Buildout of the GP/LCP would incrementally contribute to cumulative impacts to biological resources but such impacts

would not be cumulatively considerable because implementation of the GP/LCP Update would conserve existing natural resources and limit impacts on special status species and habitats for those species. Cumulative impacts to biological resources would be less than significant.

Cultural and Tribal Cultural Resources

Impact CR-1 Development facilitated by the GP/LCP Update has the potential to impact historical resources. Implementation of applicable GP/LCP actions, state and federal regulations, and the Pismo Beach Municipal Code would minimize or avoid potential adverse impacts to historical resources. Impacts to historical resources would be less than significant.

Impact CR-2 Development facilitated by the GP/LCP Update has the potential to impact unique archaeological resources. Implementation of applicable GP/LCP Update goals, state and federal regulations, and the Pismo Beach Municipal Code would minimize or avoid potential adverse impacts to archaeological resources. Impacts to archaeological resources would be less than significant.

Impact CR-3 Development facilitated by the GP/LCP Update has the potential to adversely affect previously unknown human burials, but such development would be required to adhere to existing regulations regarding the treatment of human remains. Impacts to human remains would be less than significant.

Impact CR-4 Development facilitated by the GP/LCP Update may involve excavation, which has the potential to impact previously unidentified tribal cultural resources, but such development would be required to comply with AB 52 and the GP/LCP Update goals, policies and actions designed to protect tribal cultural resources. Impacts to tribal cultural resources would be less than significant.

Cumulative Impact Compliance with applicable regulations and implementation of GP/LCP Update goals and policies would minimize cumulative impacts to cultural resources and tribal cultural resources. The GP/LCP Update includes policy language and actions to address potential impacts to cultural resources and tribal cultural resources on a project-by-project basis. Cumulative impacts to cultural resources and tribal cultural resources would be less than significant.

Energy

Impact E-1 Construction and operation of future development under the GP/LCP Update would require temporary and long-term consumption of energy resources. However, buildout of the GP/LCP Update would not result in the wasteful, inefficient, or unnecessary consumption of energy resources. Impacts related to wasteful, inefficient, or unnecessary consumption of energy would be less than significant.

Impact E-2 The GP/LCP Update would not conflict with the energy efficiency goals in the Pismo Beach Climate Action Plan. Construction and operation of projects facilitated by the GP/LCP Update would comply with relevant provisions of the State's CalGreen program and Title 24 of the California Energy Code. Impacts would be less than significant.

Cumulative Impact Energy demand associated with GP/LCP Update buildout would result in a decrease in cumulative energy demand over the life of the GP/LCP Update. The GP/LCP Update would not be expected to contribute substantially to a cumulative increase in energy demand, result in wasteful, inefficient, or unnecessary consumption of energy, or result in the need for construction of new major facilities or substantial alteration of existing facilities to meet projected energy demands. Cumulative impacts related to energy would be less than significant.

Geology and Soils

Impact GEO-1 Construction of new buildings under the GP/LCP Update would not exacerbate seismic hazards, but improperly constructed buildings may exacerbate landslide risk. Adherence to requirements of the California Building Code and implementation of the goals and policies of the GP/LCP Update would minimize the potential for loss, injury, or death following a seismic event, landslide, liquefaction, or other geologic hazards. Impacts related to such geologic hazards would be less than significant.

Impact GEO-2 Construction of new development under the GP/LCP Update would include ground disturbance that would result in loose or exposed soil that could be eroded by wind or during a storm event, resulting in the loss of topsoil. Compliance with applicable regulations, including the Clean Water Act, and implementation of goals and policies of the GP/LCP Update would minimize the potential for erosion and loss of top soil. Impacts to from soil erosion and loss of top soil would be less than significant.

Impact GEO-3 New development facilitated by the GP/LCP Update would occur where existing sewer systems are in place, minimizing the need for development of new wastewater disposal systems. Therefore, the project would not result in a significant impact to soils that are incapable of supporting septic tanks for alternative wastewater disposal systems.

Impact GEO-4 Development facilitated by the GP/LCP Update has the potential to result in impacts to paleontological resources as paleontological resources may be encountered during any ground-disturbing activities associated with construction (e.g., grading, excavation, or other ground disturbing construction activity) in areas with high paleontological sensitivity. However, GP/LCP actions implement measures to protect paleontological resources when encountered during construction. Impacts to paleontological resources would be less than significant.

Cumulative Impact The GP/LCP Update would not result in a cumulatively considerable contribution to cumulative geology, paleontology, soils, or seismicity impacts because existing regulations minimize effects from construction of new structures to related to geology, soils and seismicity and existing regulations and the policies and goals of the GP/LCP Update ensure that paleontological resources encountered during construction are property recovered and curated. Cumulative impacts related to geology, paleontology, soils, and seismicity would be less than significant.

<u>Greenhouse Gas Emissions</u>

Impact GHG-1 Buildout of the GP/LCP Update would result in new GHG emissions that may exceed applicable GHG reduction targets established by SB 32. However, the GP/LCP update identifies policies that would reduce GHG emissions, including setting reduction targets consistent with statewide GHG reduction goals and updating the climate action plan to ensure future development is consistent with statewide targets. Impacts related to GHG emissions would be less than significant.

Cumulative Impact GHG emissions are, by definition, cumulative impacts, as they add to the global accumulation of greenhouse gases in the atmosphere. GP/LCP policies would reduce GHG emissions associated with buildout of the GP/LCP Update and contribute to the Pismo Beach's fair share of statewide reduction targets. The GP/LCP Update would establish GHG reduction goals consistent with the State's 2030 and 2050

greenhouse gas emissions reduction goals, and the GP/LCP Update would be consistent with regional and State plans, policies, and regulations adopted for the purpose of reducing GHG emissions. Therefore, the GP/LCP Update's contribution to cumulative GHG and climate change impacts would be less than significant.

Hazards, Hazardous Materials, and Wildfire

Impact HAZ-1 Implementation of the GP/LCP Update could result in an incremental increase of the overall routine transport, use, storage, and disposal of hazardous materials. Compliance with applicable regulations related to the handling, transport, disposal, and storage of hazardous materials and adherence to proposed GP/LCP Update policies would minimize the risk of spills and the public's potential exposure to these substances and reduce the risk of adverse impacts of hazardous materials. This impact would be less than significant.

Impact HAZ-2 New development of residential and commercial uses facilitated by the GP/LCP Update could result in increased use and storage of hazardous materials within one quarter mile of existing schools. Compliance with regulatory requirements of the San Luis Obispo County EHS and existing applicable state and federal regulations would ensure that risks from hazardous emissions or handling of hazardous materials, substances, or waste near existing or proposed schools would remain less than significant.

Impact HAZ-3 Implementation of the GP/LCP Update could result in development of sites contaminated with hazardous materials. However, compliance with applicable regulations relating to site cleanup and adherence to the GP/LCP policies would minimize the impacts related to development on listed contaminated site. This impact would be less than significant.

Impact HAZ-4 Population growth and increased development in coastal areas as a result of the GP/LCP Update could impact evacuation routes in the event of a coastal hazard or radiation hazard event in the City. Proposed policies and mapped evacuation routes in the GP/LCP Update would ensure effective emergency response following a natural or human caused disaster. Therefore, the GP/LCP Update would not result in interference with an adopted emergency response plan or emergency evacuation plan. This impact would be less than significant.

Impact HAZ-5 The City includes a designated very high fire hazard area and is adjacent to fire hazard areas in the County. Goals and policies

included in the GP/LCP Update would minimize exposure of people or structures to risk of loss, injury, or death involving wildfire and wildland fires. This impact would be less than significant.

Cumulative Impact Cumulative impacts related to the transport, use, storage, or disposal of hazardous materials, upset conditions, hazardous emissions near schools, project locations on known or unknown hazardous materials sites, airport hazards, emergency response, and fire hazards would be less than significant.

Hydrology and Water Quality

Impact HWQ-1 Development facilitated by the GP/LCP Update could disturb soil during construction; increase impervious surfaces, stormwater runoff, erosion, and pollutants in stormwater; and/or alter drainage patterns. Compliance with NPDES permit requirements, city municipal code requirements, and GP/LCP Update policies and actions would reduce impacts related to water quality, erosion and siltation, stormwater runoff, discharges of pollutants, and changes to flood flows. This impact would be less than significant.

Impact HWQ-2 Development facilitated by the GP/LCP Update would incrementally increase the amount of impervious surface in the City and increase water use which could reduce the potential for groundwater recharge from infiltration and decrease groundwater supplies. Compliance with the City municipal code, Central Coast RWQCB's post construction requirements for stormwater management, and GP/LCP Update goals and policies would ensure that new impervious surfaces and increased water use would not substantially interfere with groundwater recharge or decrease groundwater supplies. This impact would be less than significant.

Impact HWQ-3 Development facilitated by the GP/LCP Update may occur in areas with potential for inundation by flooding, tsunami, and/or dam failure. Compliance with applicable municipal code requirements would ensure development within areas subject to inundation would be sited, designed and constructed as to not exacerbate risks from release of pollutants from inundation. These impacts would be less than significant.

Cumulative Impact The GP/LCP Update would not contribute to a significant cumulative impact related to hydrology and water quality, and the cumulative impacts resulting from the implementation of the proposed GP/LCP Update would be less than significant.

Land Use

Impact LUP-1 Implementation of the proposed GP/LCP Update would provide for orderly development in Pismo Beach and would not physically divide an established community. This impact would be less than significant.

Impact LUP-2 With an Update to the City's zoning ordinance and zoning map in conjunction with the GP/LCP Update, implementation of the GP/LCP Update would be consistent with applicable regional land use plans, policies, and regulations, such as the SLOCOG 2019 RTP/ SCS and City zoning districts and standards. This impact would be less than significant.

Cumulative Impact The GP/LCP Update would not contribute to a significant cumulative impact related to the physical division of any established community and land use plan consistency, and the cumulative impacts resulting from the implementation of the proposed GP/LCP Update would be less than significant.

Mineral Resources

No Impact The City has no active mineral operations or any lands classified as a grade II machine-readable zone for containing concrete-grate aggregate within its jurisdiction. There are no oil fields or active offshore oil drilling operations in Pismo Beach. The GP/LCP Update would have no impact from the loss of availability of mineral resources.

Noise

Impact N-1 Construction of individual projects facilitated by the GP/LCP Update would temporarily produce high noise levels, affecting nearby noise-sensitive land uses. compliance with existing Municipal Code standards and the GP/LCP Update's policies and actions would ensure construction activity associated with new development would limit noise disturbance at noise-sensitive receivers in the City. Therefore, this impact would be less than significant.

Impact N-2 Development facilitated by the GP/LCP Update would incrementally increase traffic and associated noise in Pismo Beach, exposing noise-sensitive land uses located near roadways to incrementally greater noise levels. However, implementation of Goals, policies, and actions in the GP/LCP Update would ensure that traffic noise would have a less than significant impact.

Impact N-3 New development facilitated by the GP/LCP Update would introduce operational noise sources associated with residential and non-residential land uses. The continued regulation of on-site noise, consistent with the Pismo Beach Municipal Code, would minimize disturbance to adjoining uses. Therefore, on-site operational noise would have a less than significant impact.

Impact N-4 Construction of individual projects facilitated by the GP/LCP Update would temporarily generate groundborne vibration. Estimated vibration levels would not exceed applicable Caltrans criteria for human annoyance and structure damage, and the Pismo Beach Municipal Code's timing restrictions on construction activity would limit vibration disturbance. Therefore, this impact would be less than significant.

Impact N-5 Pismo Beach is located outside of noise contours associated with the nearest airports. Therefore, the impact from exposure to aircraft noise in the City would be less than significant.

Cumulative Impact The GP/LCP Update would not contribute to a significant cumulative impact related to noise and vibration, and the cumulative impacts resulting from the implementation of the proposed GP/LCP Update would be less than significant.

<u>Population and Housing</u>

Impact PH-1 The GP/LCP Update would not result in growth in the City that is substantially greater than projected in the SLOCOG regional growth forecast. This impact would be less than significant.

Impact PH-2 Implementation of the GP/LCP Update would not displace substantial numbers of existing housing or people, necessitating the construction of replacement housing elsewhere. Impacts would be less than significant.

Cumulative Impact The GP/LCP Update would not contribute to cumulative impacts related to displacement in the greater cumulative impact analysis area (San Luis Obispo County), and would not result in significant cumulative population growth impacts beyond the City. The incremental population impacts of the proposed GP/LCP Update would not be cumulatively considerable.

Public Services and Recreation

Impact PUB-1 Development facilitated by the GP/LCP Update would result in an increase in the City's population. This would increase demand for fire, police, school, and other City services and potentially create the need for new police, fire, school, or other service facilities. However, payment of City required public facilities impact fees, and management of future growth would avoid adverse environmental effects associated with the provision of new or physically altered fire, police, school, or other public facilities. This impact would be less than significant.

Impact PUB-2 Development associated with the GP/LCP Update would add population to the City that would increase use of parks and recreation facilities. However, park facilities have adequate capacity and with compliance with the GP/LCP Update policies impacts related to construction of park facilities would be less than significant.

Cumulative Impacts The GP/LCP Update would result in less than significant impacts to fire, police, school, parks and recreational facilities, and other public services and facilities. Growth anticipated under the GP/LCP Update would be within SLOCOG projections. Therefore, although the GP/LCP Update would have an incremental contribution to cumulative impacts associated with public services and recreation, the contribution would not be cumulatively considerable. Cumulative impacts would be less than significant.

Transportation

Impact T-1 Implementation of the General Plan and Local Coastal Plan Update would increase vehicle traffic volumes which has the potential to interfere with pedestrian and bicycle travel on or along roadways. However, the GP/LCP Update includes goals and policies to improve safety, access, and performance of transit, vehicular, bicycle, and pedestrian transportation modes, consistent with the SLOCOG 2019 RTP Pismo Beach Bicycle and Pedestrian Master Plan, and Pismo Beach Complete Street Master Plan. This impact would be less than significant.

Impact T-3 The GP/LCP Update is a program-level plan that does not implement specific design features. Future roadway improvements and site access measures would be designed and reviewed in accordance with federal, state, and city standards. This impact would be less than Significant.

Impact T-4 The proposed GP/LCP Update includes a program-level Circulation Element Update that identifies circulation improvements and policies to support emergency access throughout the City. This impact would be less than significant.

Cumulative Impact: There are existing federal, State, and local regulations that govern potential transportation hazards and emergency access associated with development and infrastructure projects. Regulations and oversight would effectively reduce the potential for individual projects to create a transportation hazards or emergency access impact within the City as well as in San Luis Obispo County. Thus, cumulative impacts related to the transportation hazards and emergency access would be less than significant.

Utilities and Service Systems

Impact U-1 Development facilitated by the GP/LCP Update would increase the demand for water supply and water infrastructure. However, the City of Pismo Beach projects that City water supply is sufficient to meet the projected water demand under buildout associated with the GP/LCP Update. This impact would be less than significant.

Impact U-2 Development facilitated by the GP/LCP Update would increase demand for wastewater collection and treatment. However, replacement of old sewer lines and lift equipment under the City's Capital Improvement Plant and implementation of the goals and policies of the GP/LCP Update to ensure sufficient wastewater treatment capacity would generally occur in previously disturbed or developed areas. This impact would be less than significant.

Impact U-3 Development facilitated by the GP/LCP Update would increase the demand for electric power, natural gas, telecommunications, and stormwater facilities. However, development facilitated by the GP/LCP Update would occur in developed areas of the City where these facilities exist and relocation, if applicable, would generally occur in previously disturbed or developed areas. This impact would be less than significant.

Impact U-4 Development facilitated by the GP/LCP Update would increase waste sent to area landfills. However, Cold Canyon Landfill would have capacity to serve the development envisioned in the GP/LCP Update. Goals and policies in GP/LCP Update would increase the amount of waste that is diverted from the landfill and encourage reuse and recycling. This impact would be less than significant.

Cumulative Impacts The GP/LCP Update the project would not result in a considerable contribution to cumulative impacts related to physical disturbance for new or expanded wastewater systems and infrastructure, water supply impacts, the provision of electrical power, natural gas, telecommunication, and storm drain facilities, or solid waste.

Findings Associated with Significant, Potentially Significant, and Cumulative Significant Impacts that Can Be Mitigated to a Less-than-Significant Level

The City of Pismo Beach hereby adopts and makes the following findings related to its approval of the project. Having received, reviewed, and considered the entire record, both written and oral, related to the GP/LCP Update and Final EIR, the City makes the following findings associated with potentially significant impacts that can be mitigated to a less-than-significant level through implementation of mitigation measures identified in the Final EIR.

Project-Level Air Quality

Impact AQ-2 Buildout of the GP/LCP Update would result in short-term emissions of criteria pollutants. Construction emissions from future projects in the planning area would be quantified once project details are known and evaluated for potential impacts in accordance with San Luis Obispo Air Pollution Control District (SLOAPCD) guidance. SLOAPCD provides standard emissions reduction measures for construction emissions impacts which are included as required mitigation. This impact would be **less than significant with mitigation**.

Finding: Mitigation Measure(s) Feasible and Required; Impact Reduced to Less-than-Significant Level. *Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the Final EIR*.

Mitigation Measures: Mitigation Measure AQ-1 “Standard Mitigation for Construction Equipment,” listed below, has been adopted to reduce construction-related emissions to a less-than-significant level.

> **Mitigation Measure AQ-1 Standard Mitigation for Construction Equipment.** Proponents of individual land use projects, or other projects requiring grading or building permits, shall require construction contractors to incorporate the following standard mitigation measures, as applicable, to reduce reactive organic gases (ROG), nitrogen oxides (NO_X), and diesel particulate matter (DPM) emissions from construction equipment. Mitigation measures shall be listed on project construction plans and the project proponent shall perform periodic site

inspections during construction to ensure that mitigation measures are being implemented.

- Maintain all construction equipment in proper condition according to manufacturer's specifications
- Fuel all off-road and portable diesel-powered equipment with California Air Resource's Board (CARB)-certified motor vehicle diesel fuel (non-taxed version suitable for use off-road)
- Use diesel construction equipment meeting CARB's Tier 2 certified engines or cleaner off-road heavy-duty diesel engines, and comply with the State off-road Regulation
- Use on-road heavy-duty trucks that meet CARB's 2007 or cleaner certification standard for on-road heavy-duty diesel engines, and comply with the State On-Road Regulation
- Construction or trucking companies with fleets that that do not have engines in their fleet that meet the engine standards identified in the above two measures (e.g. captive or NOx exempt area fleets) may be eligible by proving alternative compliance
- All on and off-road diesel equipment shall not idle for more than 5 minutes. Signs shall be posted in the designated queuing areas and or job sites to remind drivers and operators of the 5 minute idling limit
- When feasible for project-specific occasions, diesel idling within 1,000 feet of sensitive receptors is not permitted
- When feasible for project specific occasions, staging and queuing areas shall not be located within 1,000 feet of sensitive receptors
- Electrify equipment when feasible
- Substitute gasoline-powered in place of diesel-powered equipment, where feasible
- Use alternatively fueled construction equipment on-site where feasible, such as compressed natural gas (CNG), liquefied natural gas (LNG), propane or biodiesel.

Support for Finding: Buildout of the GP/LCP Update would result in short-term emissions associated with construction activities, such as construction worker travel to and from project sites, delivery and hauling of construction supplies and debris, fuel combustion by on-site construction equipment, and application of architectural coatings and other products. These construction activities would temporarily create emissions of dust, equipment exhaust, and other air contaminants, particularly during site preparation and grading. The SLOAPCD provides standard mitigation measures for construction in their CEQA Air Quality Handbook, which are included as Mitigation Measure AQ-1. Future development projects in Pismo Beach would be evaluated for air quality impacts once project-level details are known and would be required to incorporate additional mitigation if construction emissions from individual development projects would exceed applicable project-level thresholds established by SLOAPCD. Because individual projects would be required to evaluate and mitigate potential air quality impacts

resulting from construction emissions and mitigate emissions as required by SLOAPCD guidance, air quality impacts from construction of the GP/LCP Update would be mitigated to a less than significant level.

Reference: Final EIR, Pages 4.2-19 through 4.2-21

Findings Associated with Significant Impacts that Cannot Feasibly Be Mitigated to a Less-than-Significant Level

The City of Pismo Beach hereby adopts and makes the following findings related to its approval of the project. Having received, reviewed, and considered the entire record, both written and oral, related to the GP/LCP Update and Final EIR, the City makes the following findings associated with significant, unavoidable impacts that cannot be mitigated to a less-than-significant level through implementation of mitigation measures identified in the Final EIR.

Project-Level Air Quality

Impact AQ-1 The GP/LCP Update would result in an increase in projected population that would exceed the 2001 Clean Air Plan (CAP) projections for Pismo Beach, which would produce long-term operational criteria pollutant emissions beyond those planned for the region. This inconsistency with the SLOAPCD CAP would be **significant and unavoidable.**

Finding: No feasible mitigation strategies are available to reduce this impact, beyond the GP/LCP Update policy framework. *Specific economic, social or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measure or project alternatives identified in the final EIR.*

Mitigation Measures: No feasible mitigation strategies are available to reduce this impact, beyond the GP/LCP Update policy framework.

Support for Finding: The GP/LCP Update would comply with applicable GP/LCP Update goals and policies and applicable land use and transportation control measures contained in the SLOAPCD 2001 CAP to the extent feasible. However, the GP/LCP Update would result in an increase in projected population that would exceed the 2001 CAP growth projection assumptions for Pismo Beach, which would produce long-term operational criteria pollutant emissions beyond those planned for the region. Therefore, the GP/LCP Update would conflict with SLOAPCD's assumptions for population growth. As a result, the GP/LCP Update could result in long-term operational criteria pollutant emissions that may obstruct implementation of the applicable air quality plan, which would be a significant impact. No additional policy-oriented mitigation is available that would reduce projected population increase such that it would not exceed projected population growth for Pismo Beach, particularly in the context of the GP/LCP objective of ensuring that the City's land use plan meets the fair share housing needs allocation

established in the San Luis Obispo Council of Governments (SLOCOG) Regional Housing Needs Plan (RHNP). Therefore, the GP/LCP Update would be inconsistent with the 2001 CAP, and the impact to regional air quality associated with long-term operational emissions in Pismo Beach would remain significant and unavoidable.

Reference: Final EIR, Pages 4.2-9 through 4.2-19

Cumulative Air Quality

Cumulative Impact Buildout of the GP/LCP Update would result in an increase of population growth that exceeds the population projections used in the most recent SLOAPCD CAP for the same area. The population increase would result in individual development projects that may exceed regulatory thresholds. The 2001 CAP is intended to bring the County into attainment of the State ozone standard. Because the GP/LCP Update would be inconsistent with the CAP, the GP/LCP Update's contribution to cumulative regional air quality impacts would be **significant and unavoidable**.

Finding: No feasible mitigation strategies are available to reduce this impact, beyond the GP/LCP Update policy framework. *Specific economic, social or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measure or project alternatives identified in the final EIR.*

Mitigation Measures: No feasible mitigation strategies are available to reduce this impact, beyond the GP/LCP Update policy framework.

Support for Finding: Implementation of the GP/LCP Update would result in an increase of population growth that exceeds the population projections used in the most recent SLOAPCD CAP for the same area. Individual development projects may exceed regulatory thresholds due to this population increase. The 2001 CAP is intended to bring the County into attainment of the State ozone standard. The GP/LCP Update would be inconsistent with the CAP and therefore the GP/LCP Update's contribution to cumulative regional air quality impacts would be significant and unavoidable.

Cumulative impacts associated with potential increases in Toxic Air Contaminants, Carbon Monoxide hot spots, and odor nuisances are addressed with implementation of GP/LCP Update goals, policies and actions to minimize these effects.

Reference: Final EIR, Page 4.2-24

Project-Level Transportation

Impact T-2 The GP/LCP Update anticipates growth that would result in an overall increase in vehicle miles traveled (VMT) in the region. The GP/LCP Update Circulation Element includes goals and policies that would establish local screening thresholds for streamlining VMT analysis. However, future development in Pismo Beach would result in an overall net increase in regional VMT as well as residential VMT per capita. No feasible mitigation is available that would fully address the anticipated increase in VMT. As a result, this impact would be **significant and unavoidable**.

Finding: No feasible mitigation strategies are available to reduce this impact, beyond the GP/LCP Update policy framework. *Specific economic, social or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measure or project alternatives identified in the final EIR.*

Mitigation Measures: No feasible mitigation strategies are available to reduce this impact, beyond the GP/LCP Update policy framework.

Support for Finding: The GP/LCP Update is projected to increase total regional VMT, daily VMT per capita, and daily VMT per employee, which would exceed the VMT thresholds identified in the Office of Planning and Research's (OPR's) Technical Advisory on Evaluating Transportation Impacts. Implementation of the goals and policies in the GP/LCP Update would contribute to reducing VMT in Pismo Beach. The potential VMT reduction that may result from implementation of the GP/LCP Update policies is not quantifiable in the context of the Pismo Beach Travel Demand Model/ 2014 SLOCOG Regional Travel Demand Model, and therefore is speculative. No feasible mitigation beyond the policies already included in the GP/LCP Update Circulation Element is available that would fully address the anticipated increase in VMT resulting from the GP/LCP Update. Therefore, impacts associated with increased VMT would remain significant and unavoidable after implementation of all applicable policies in the GP/LCP Update, including but not limited to:

Goal CIR-1 Provide a circulation system that supports safe and efficient travel for all modes of transportation.

Goal CIR-2 Plan and provide pedestrian and bicycle facilities to encourage and meet the walking and bicycling needs of the city.

Goal CIR-3 Promote the use of public transit and seasonal shuttle services

- **Policy CIR-4.1.5: Vehicle Miles of Travel.** Maintain and reduce average regional vehicle miles of travel in accordance with State Senate Bill 743 and California Office of Planning & Research Technical Guidance.
  a) New development that is projected to exceed average regional vehicle miles of travel shall be required to implement mitigations or modify the proposed project to the maximum extent feasible.

- Assess OPR Technical Guidance Thresholds of Significance and develop local City thresholds of significance if unacceptable.

b) Develop screening thresholds to streamline VMT Analysis including metrics such as:
   - Screening Threshold for Small Projects
   - Map-Based Screening for Residential & Office Projects
   - Screening Thresholds for Projects near High Quality Transit
   - Screening Thresholds for Affordable Housing

- **Policy CIR-4.1.7: Neighborhood Context.** Support safe, complete and well-connected neighborhoods for street, bicycle, and pedestrian access. Connections should balance circulation needs within the neighborhood context.
- **Policy CIR-4.1.15: Complete Streets.** When constructing or modifying transportation facilities, strive to provide for the movement of vehicles, commercial trucks, alternative and low energy vehicles, transit, bicyclists and pedestrians appropriate for the road classification and adjacent land use.
  a) Evaluate projects to ensure that the safety, comfort, and convenience of pedestrians, bicyclists and transit users are given equal level of consideration to motor vehicle operators.
  b) Consider ways to increase and improve travel choices when reviewing development or transportation infrastructure projects.
  c) Consider roundabouts or other innovative designs as alternatives to stop signs and traffic signals when studying intersection configuration options.
  d) Require sidewalks on all streets where possible. Where feasible, separate sidewalks from streets on arterials and collectors with landscaping including a tree canopy to create shade.
  e) Improve the existing street network to minimize travel times and improve mobility for transit, bicycle, and walking trips between new projects and surrounding land uses to reduce vehicle trips.

- **Policy CIR-4.1.26: Traffic Calming.** Traffic calming techniques may be employed to mitigate the traffic effects of new development on minor and major collector streets. The City shall adopt and maintain Traffic Calming Handbook adopted 10/19/21 for application and design of traffic calming measures.
- **Policy CIR-4.1.27: Update and Adopt Transportation Impact Analysis (TIA) Guidelines.** Update and adopt Transportation Impact Analysis guidelines consistent with State Assembly Bill 743 and maintain a local LOS assessment methodology for the evaluation of potential transportation impacts and local policy inconsistency resulting from new development.
- **Policy CIR-4.1.48: Promote Walking and Biking.** Promote walking and bicycle riding for transportation, recreation, commuting, and improvement of public and environmental health. Make downtown more functional and enjoyable for bicyclists and pedestrians. Pedestrian walkways and bicycle paths shall receive at least the same emphasis and attention in future planning as facilities designed for the automobile.

- **Policy CIR-4.1.51: Existing Facilities.** Maintain and improve existing multimodal circulation and transportation systems and facilities, to maximize alternatives to new street and highway construction. Complete a network of bicycle lanes and paths, sidewalks and pedestrian paths within existing developed parts of the City and extend the system to serve new growth areas.
- **Policy CIR-4.1.58: Bikeways Encouraged.** Bikeways shall be encouraged within the City and adjoining jurisdictions as a complement to Pismo Beach's visitor and recreation emphasis, to reduce automobile trips and for the convenience of visitors and residents. The City's bikeway plan will be coordinated with the San Luis Obispo Area Coordinating Council and Regional Transportation Agency, and the County of San Luis Obispo Regional Transportation Plan.
- **Policy CIR-4.1.62: Bicycle Use by City Employees.** Establish a program to encourage bicycle use among City employees.
- **Policy CIR-4.1.70: Pedestrians Connections to Employment Destinations.** Encourage the development of a network of continuous walkways within new commercial, town center, public, and industrial uses to improve workers' ability to walk safely around, to, and from their workplaces. Where possible, route pedestrians to grade separated crossings across US 101.
- **Policy CIR-4.1.75: Promote Safe, Efficient, and Convenient Public Transportation.** Promote the use of public transportation for daily trips, including to schools and workplaces, as well as other purposes.
- **Policy CIR-4.1.76: Work with Multiple Agencies and Jurisdictions.** Continue to cooperate with other agencies and jurisdictions to promote local and regional public transit, including SLORTA and SCT serving Pismo Beach.
- **Policy CIR-4.1.79: Comprehensive Transit Services.** The City shall support the availability of transit service as a means to reduce automobile congestion~~.~~, to provide transportation for those who have no other form of transportation, as a means to reduce air pollution, and as a service to visitors. Such support should include, but not be limited to, SCT, Greyhound bus service, vanpools, shuttle bus systems, dial-a-ride services, and cab services.
- **Policy CIR-4.1.80: Vanpools and Ride Sharing.** The City shall encourage and support vanpools and ride sharing. A special program should be developed in cooperation with the visitor industry to encourage vanpools and ride sharing for hotel and related workers. Appropriate locations shall be designated for ride share parking lots.
- **Policy CIR-4.1.87: Transit Usability.** Work with SLORTA to situate transit stops at locations that are convenient for transit users and promote increased transit ridership through the provision of shelters, benches, bike racks on buses, ADA compliance, and other amenities.
- **Policy CIR-4.1.88: Transit Services Marketing.** Encourage ridership on public transit systems through marketing and promotional efforts. Provide information to residents and employees on transit services available for local and regional trips.

Reference: Final EIR, Pages 4.14-13 through 4.13-17

Cumulative Transportation

Cumulative Impact The cumulative growth evaluated under GP/LCP Update Buildout Conditions would result in an increase in the total regional VMT, daily VMT per capita, and daily VMT per employee. The individual potential impacts of future development in Pismo Beach are speculative; however, the cumulative impact of the increase in VMT in Pismo Beach and in San Luis Obispo County identified for the GP/LCP Update would be potentially significant. Future development in Pismo Beach would result in increased long-term VMT, even with implementation of identified goals and policies that would incrementally reduce VMT. Future individual development projects in Pismo Beach would require focused, project-level environmental review, and would require project-specific mitigation to reduce VMT where potential environmental impacts are identified. Implementation of the goals and policies in the GP/LCP Update would contribute to reducing VMT in Pismo Beach, but no additional feasible mitigation is available that would fully address the anticipated increase in VMT resulting from the GP/LCP Update. Therefore, cumulative transportation impacts from new VMT in the region would remain **significant and unavoidable**.

Finding: No feasible mitigation strategies are available to reduce this impact, beyond the GP/LCP Update policy framework. *Specific economic, social or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measure or project alternatives identified in the final EIR.*

Mitigation Measures: No feasible mitigation strategies are available to reduce this impact, beyond the GP/LCP Update policy framework.

Support for Finding: The cumulative growth evaluated under GP/LCP Update Conditions would result in an increase in the total regional VMT, daily VMT per capita, and daily VMT per employee. The individual potential impacts of future development in Pismo Beach are speculative; however, the cumulative impact of the increase in VMT in Pismo Beach and in San Luis Obispo County identified for the GP/LCP Update would be potentially significant. Future development in Pismo Beach would result in increased long-term VMT, even with implementation of identified goals and policies that would incrementally reduce VMT. Future individual development projects in Pismo Beach would require focused, project-level environmental review, and would require project-specific mitigation to reduce VMT where potential environmental impacts are identified. Implementation of the goals and policies in the GP/LCP Update would contribute to reducing VMT in Pismo Beach, but no additional feasible mitigation is available that would fully address the anticipated increase in VMT resulting from the GP/LCP Update. Therefore, cumulative transportation impacts from new VMT in the region would remain significant and unavoidable.

Reference: Final EIR, Page 4.14-23

Findings Regarding Alternatives

CEQA requires that an EIR evaluate a range of reasonable alternatives to a project, or to the location of the project, which would feasibly obtain most of the basic project objectives but would avoid or substantially lessen any of the significant effects of the project (*CEQA Guidelines* §15126.6). The No Project alternative must be evaluated, and if it is the environmentally superior alternative, another environmentally superior alternative must be identified among the other alternatives (CEQA Guidelines Section 15126.6[e]).

The Final EIR presented four alternatives to the GP/LCP Update. The alternatives presented included the statutorily-mandated "No Project/Continue Using 1992 General Plan and Local Coastal Plan" alternative, as well as a "Reduced Residential Buildout" alternative, a "Reduced Commercial Floor Area" alternative, and a “Proposed General Plan and Local Coastal Plan Update with Expanded Sphere of Influence” alternative.

As discussed in Section 6.1.1 of the Final EIR, alternatives were considered but rejected from further consideration or analysis in the EIR included alternate locations for the project, and a more narrow GP/LCP update including fewer elements. An alternate location is not feasible because the GP/LCP Update is a plan guiding the growth and development of areas that are located specifically within the jurisdiction of Pismo Beach. However, within Pismo Beach, the alternatives analyzed in the EIR consider different patterns of land use and infrastructure to accommodate forecasted future growth and regional housing needs, as well as development within the Sphere of Influence (SOI).

A focused update to the GP/LCP that would not include changes to the Circulation Element was also considered as an alternative. However, the City determined that changes anticipated to the Land Use and Community Design Element and resulting buildout scenario would also require a comprehensive update that included updates to the Circulation Element. Therefore, focused update to the GP/LCP was rejected from further consideration.

Each of the four alternatives presented and analyzed in the Final EIR are rejected as infeasible. The City Council makes this determination after taking into account economic, legal, social, technological and/or other considerations, including the provision of employment opportunities for highly trained workers. The justifications for rejecting the Final EIR alternatives as infeasible are explained below for each separate alternative.

<u>Alternative 1: No Project/Continue Using 1992 General Plan and Local Coastal Plan</u>
The "No Project" alternative is mandated by CEQA. It allows for an assessment of what the environmental consequences would be of not moving forward with a proposed project. The No Project Alternative (Alternative 1) is comprised of a land use pattern that reflects the land use identified in the existing 1992 GP/LCP, most recently updated in

2018 (Land Use and Circulation Elements). Under this alternative, the GP/LCP Update would not be adopted and the existing GP/LCP, including the land use map and all of the GP/LCP goals and policies, would remain in place through the horizon year of 2040. Thus, any new development in Pismo Beach would occur consistent with the existing land use designations and the allowed uses within each designation. Similarly, any new infrastructure would occur as envisioned in the existing 1992 General Plan. Development under this alternative is anticipated to be generally similar to the proposed General Plan Update in much of the City but would not include mixed-use development in the downtown area, a focus on affordable housing and other updates to comply with current State law, lower-cost visitor-serving accommodations, or updates to address sea level rise and resiliency. Buildout of the existing 1992 GP/LCP was estimated as part of the 2018 Circulation Element Update, and was found to provide for the growth of 476 new residential units and 690 jobs as compared to an estimated 1,111 new residential units and 545 jobs under the GP/LCP Update. As a result, overall residential development and anticipated population growth would be reduced under Alternative 1 compared to the GP/LCP Update, whereas overall non-residential (commercial, mixed use, and public/semi-public) development and anticipated jobs growth would be increased under Alternative 1 compared to the GP/LCP Update.

Alternative 1 would have lesser, and less than significant impacts than the Project in the areas of aesthetics; biological resources; cultural/tribal cultural resources; energy; geology and soils; hazards, hazardous materials, and wildfire; hydrology and water quality; noise; public services and recreation, and utilities and service systems. Further, Alternative 1 would have similar, and less than significant, impacts as the Project with respect population and housing.

Alternative 1 would avoid significant and unavoidable impacts to air quality because it would result in less population growth and associated new vehicle traffic and would, therefore, be more consistent with the assumptions in the SLOAPCD's 2001 CAP than the GP/LCP Update, and less than significant. Alternative 1 would also reduce project-level and cumulative impacts associated with increased VMT, but transportation impacts would remain significant and unavoidable. Alternative 1 would result in increased impacts to greenhouse gases, which would have the potential to be significant and unavoidable due to inconsistency with the Pismo Beach Climate Action Plan. Alternative 1 would also result in increased impacts to land use and planning, although these impacts use would remain less than significant; however, impacts related to greenhouse gases may be potentially significant .

Alternative 1 is rejected as infeasible because it fails to meet any of the project objectives, including the Project's objective to guide land use decisions within the city planning area through the year 2040, consistent with the community vision and guiding principles. Alternative 1 would not implement new policy language included in the GP/LCP Update, such as policies intended to provide guidance for future development and effectively manage growth. Alternative 1 would not eliminate the significant and unavoidable project-level or cumulative impacts associated with increased VMT, and

would increase impacts in the areas of greenhouse gas emissions, and land use and planning.

Alternative 2: Reduced Residential Buildout

Under the Reduced Residential Buildout Alternative (Alternative 2), the maximum residential buildout that would occur within the 2040 planning horizon is assumed to be reduced by 50 percent for all residential land use designations (low-density, medium-density, high density, very high-density, and mobile home park). Development under Alternative 2 would be subject to all goals and policies put in place by the GP/LCP Update.

Buildout under Alternative 2 would result in approximately 556 new residential units constructed in the City limits compared to approximately 1,111 new residential units under the GP/LCP Update. This would be a reduction in new residential development potential of approximately 555 units as compared to the GP/LCP Update.

Alternative 2 would result in a 50 percent reduction in overall planned residential land use capacity in Pismo Beach, resulting in a reduction in overall population growth through 2040 as compared to the Project. As a result of this reduction in future development and growth, Alternative 2 would result in reduced impacts to issue areas including aesthetic resources, air quality, biological resources, cultural and tribal cultural resources, greenhouse gas emissions, geology and soils, energy, hazards/wildfire, hydrology, noise, public services/recreation, and utilities/service systems. Alternative 2 would have impacts similar to those of the Project in the areas of land use and planning, and population and housing. Alternative 2 would reduce project-level and cumulative impacts to air quality to a less than significant level due to the overall reduction in residential development that would result in consistency with the 2001 CAP and a reduction in total VMT. However, Alternative 2 would still result in local and regional VMT growth. Therefore, project-level and cumulative transportation impacts under Alternative 2 would remain significant and unavoidable.

Alternative 2 is considered the environmentally superior alternative because it would be most effective in eliminating or reducing the anticipated adverse environmental effects of the project, in that it would have similar or lesser impacts in all issue areas. However, Alternative 2 is rejected as infeasible because reducing the overall residential development in Pismo Beach would be inconsistent with the objective of the GP/LCP Update to ensure that the City's land use plan meets the fair share housing needs allocation established in the SLOCOG RHNP, and this alternative would not meet the basic project objective to manage growth in Pismo Beach. Additionally, Alternative 2 would not eliminate the significant and unavoidable project-level or cumulative impacts associated with increased VMT.

Alternative 3: Reduced Commercial Floor Area Ratio

Under the Reduced Commercial Floor Area Ratio (FAR) Alternative (Alternative 3), the maximum allowable FAR for new Commercial land use designations would be reduced from 2.0 to 1.5 and new Central Commercial land use designations would be reduced from 1.25 to 1.0 to reduce commercial density. Because Pismo Beach is a jobs-rich environment and a regional tourism destination, reducing visitor-serving commercial density is expected to reduce the estimate of overall VMT in the regional traffic model. Approximately 85 percent of the potential new non-residential development identified for the GP/LCP Update is comprised of Commercial and Central Commercial land uses (approximately 420,000 square feet of Commercial and approximately 250,000 square feet of Central Commercial), with the remaining 15 percent being comprised of mixed-use and public/semi-public land uses. Development under Alternative 3 would be subject to all goals and policies put in place by the GP/LCP Update.

Under Alternative 3, approximately 630,000 square feet of new non-residential development could be constructed in the City limits compared to approximately 780,000 square feet of new non-residential development under the GP/LCP Update. This would be a reduction in new commercial development potential of approximately 150,000 square feet as compared to the GP/LCP Update.

Alternative 3 would result in less new commercial and visitor-serving development due to the reduction in commercial FAR. However, Alternative 3 would not result in a reduction in residential development or potential population growth. Overall, Alternative 3 would result in reduced impacts to issue areas including aesthetic resources, greenhouse gas emissions, noise, utilities/service systems, and energy. Alternative 3 would have impacts similar to those of the Project in the areas of biological resources, cultural/tribal cultural resources, geology/soils, hazards/wildfire, hydrology/water quality, land use and planning, population and housing, and public services/recreation. Further, although population growth under Alternative 3 would be similar to the population growth under implementation of the GP/LCP Update, Alternative 3 would reduce, but not eliminate the project-level and cumulative significant and unavoidable impacts to air quality and transportation.

After Alternative 2, Alternative 3 is the next most environmentally superior alternative when considering overall environmental impacts relative to the performance metrics. However, Alternative 3 is rejected as infeasible because reducing visitor-serving commercial density under this alternative would be inconsistent with Pismo Beach's community vision to enhance a vibrant tourist-based economy and guiding principle to support the visitor population. Additionally, Alternative 3 would reduce, but not avoid the significant and unavoidable project-level or cumulative air quality and transportation impacts associated with the population growth and increased VMT that would be expected under this alternative.

Alternative 4: Proposed General Plan and Local Coastal Plan Update with Expanded Sphere of Influence Development

Under the Proposed GP/LCP Coastal Plan Update with Expanded Sphere of Influence (SOI) Development Alternative (Alternative 4), the project area would include expanded development potential within the City's SOI. The SOI includes 1,282 acres of land in Price Canyon and along Oak Park Boulevard and a small area along Mattie Road. Future land use designations within the SOI are not specifically defined or included within the buildout assumptions of the GP/LCP Update; therefore, this alternative assumes up to 10 percent of the City's 1,282 acres of SOI area (128 acres) would be developed during the 2040 planning horizon with a mix of single- and multi-family residential land uses reflecting a mix of densities similar to existing residential development throughout the City.

Under Alternative 4 the City would annex portions of the SOI planned for urban land use development and provide municipal services. Up to 128 acres of new residential land use area in the Price Canyon and Los Robles del Mar areas of the SOI would become available for development, which may accommodate approximately 1,800 new single- and multi-family residential units. Assuming that new residential development in the SOI areas would be at a similar density to anticipated new residential development throughout the City, full buildout of Alternative 4 would result in a population increase of approximately 5,185 and a total City-wide population of up to 13,422 in 2040. This would be approximately 3,000 more residents compared to the year 2040 population under full implementation of the GP/LCP Update. Overall, Alternative 4 would increase the growth in population in Pismo Beach through the year 2040 by approximately 30 percent compared to the GP/LCP Update. Due to the increase in overall growth, this alternative would also increase new vehicle traffic. Development under Alternative 4 would be subject to all goals and policies put in place by the GP/LCP Update.

Alternative 4 would result in an increase in overall development in currently undeveloped space within the City's SOI. Therefore, overall population growth would be greater under this alternative and would worsen the project-level and cumulative significant and unavoidable impacts associated with air quality and transportation. Alternative 4 would result in increased impacts to greenhouse gases, which would remain less than significant. Alternative 4 would also result in greater, but less than significant, impacts in the issue areas of aesthetics, energy, geology/soils, hazards/wildfire, hydrology/water quality, land use and planning, noise, and public services/recreation. Alternative 4 would also result in greater and significant and unavoidable impacts not present with the project in the issue areas of biological resources, cultural and tribal cultural resources, population and housing, and utilities and service systems.

Alternative 4 is rejected as infeasible because this alternative would generally result greater environmental impacts than the proposed project in several issue areas. Alternative 4 would not eliminate the significant and unavoidable project-level or cumulative impacts to air quality and transportation and would result in additional

significant and unavoidable impacts to other resources. Also, growth facilitated by Alternative 4 would potentially conflict with policies intended to effectively manage growth and to preserve and protect resources in the City.

Significant Irreversible Environmental Effects; Growth Inducement.

CEQA Guidelines Section 15126.2(d) requires a discussion of any significant irreversible environmental changes that would be caused by the proposed project should it be implemented. Such significant irreversible environmental changes may include the following:

- Use of non-renewable resources during the initial and continued phases of the project that would be irreversible because a large commitment of such resources makes removal or non-use unlikely
- Primary impacts and, particularly secondary impacts (such as highway improvements that provide access to a previously inaccessible area) that generally commit future generations to similar uses
- Irreversible damage which may result from environmental accidents associated with the project

As discussed in Section 5, *Other CEQA Required Discussions*, of the Final EIR, construction of the proposed project would require the use of building materials and energy, some of which are non-renewable resources. Consumption of these resources would occur with any development projects in the region and are not unique to the Pismo Beach or the GP/LCP Update. Growth facilitated by the GP/LCP Update would require an irreversible commitment of law enforcement, fire protection, water supply, wastewater treatment, and solid waste disposal services. As discussed in Sections 4.13, *Public Services and Recreation*, and 4.15, *Utilities and Service Systems,* of the Final EIR, it is not anticipated that the proposed project would significantly affect public services or utilities with implementation of the policies included in the GP/LCP Update.

The anticipated increase in vehicle trips associated with buildout of the GP/LCP Update would incrementally contribute to local traffic, air quality emissions, and greenhouse gas emissions. As described in Section 4.14, *Transportation*, projected future development within the City would increase regional VMT. Consistent with GP/LCP Update Circulation Element Policy 4.1.5, future development that is projected to exceed the average regional VMT would be required to implement VMT-reducing mitigations or modify the proposed development to reduce VMT to the maximum extent feasible. While the potential impacts of individual future development projects in the City are speculative, the overall potential project-level and cumulative impacts of the increase in VMT in the City and County identified for the GP/LCP Update would be significant and unavoidable. As discussed in Section 4.2, *Air Quality*, of this EIR, the additional population growth associated with buildout of the GP/LCP would be inconsistent with assumptions on which the CAP is based, and project-level and cumulative impacts related to CAP consistency would be significant and unavoidable.

Buildout of the GP/LCP Update could accommodate an estimated 1,111 new dwelling units and 1,979 new residents in the City beyond 2019 existing conditions. Additionally, anticipated population and housing growth in the City through 2040 under the General GP/LCP Update is similar to the SLOCOG population and housing growth projections for the City. Furthermore, the land use plan and policies in the GP/LCP Update focus on development in underutilized sites within City boundaries, with limited vacant land, to support growth in areas already well-served by existing public facilities and services.

The GP/LCP Update would result in an increase of approximately 783,268 square feet of nonresidential development that would generate approximately 545 permanent employment opportunities in the City. Additionally, the GP/LCP Update would generate temporary employment opportunities during construction of future residential and nonresidential projects. As construction workers would be expected to be drawn from the existing regional work force, construction of future development projects would not be considered growth-inducing.

The City contains 288 vacant or underutilized parcels, with the rest of the City occupied by development or open space. With a lack of substantial developable area, any economic expansion induced by the GP/LCP Update is not anticipated to result in direct physical environmental effects beyond those described throughout Section 4 of the Final EIR, or as a result of development expected to occur under the GP/LCP Update. Moreover, the environmental effects associated with future development in or around Pismo Beach as a result of the GP/LCP Update would be fully addressed as part of the CEQA environmental review for individual development projects as they are considered by City decisionmakers.

The GP/LCP Update encourages mixed-use development, particularly in the Downtown Core of the City, which currently consists of resort commercial, commercial, public/semi-public, open space, high-density residential, and low density residential uses. Thus, despite this anticipated land use change in the Downtown Core, the GP/LCP Update would generally preserve the existing pattern of land uses in the City. By focusing development within already urbanized areas, implementation of the GP/LCP Update would reduce growth pressure in undeveloped areas along the periphery of the City. This constrained growth pressure would reduce the potential for impacts relating to issues such as biological resources,regional traffic, and air quality as compared to development on lands beyond urban limits.

Future land use designations within the SOI are not specifically defined or included within the buildout assumptions of the GP/LCP Update. Because the GP/LCP Update does not include any future development, utilities, or transportation improvement in the SOI, the GP/LCP Update would not result in the removal of an obstacle to growth.

STATEMENT OF OVERRIDING CONSIDERATIONS FOR SIGNIFICANT AND UNAVOIDABLE IMPACTS

In approving the GP/LCP Update, which is evaluated in the Final EIR, the City makes the following Statement of Overriding Considerations in support of its findings on the Final EIR. After review of the

entire administrative record, the City Council finds that specific economic, legal, social, technological, and other anticipated benefits of the project outweigh its significant and unavoidable adverse environmental impacts and therefore justify the approval of the project. The City Council finds that the project has eliminated or substantially lessened all significant effects on the environment where feasible, and finds that, on balance, the remaining significant and unavoidable impacts of the project are acceptable because the benefits of the project outweigh them. The City Council finds that each of the overriding considerations set forth below constitutes a separate and independent ground for such a finding.

The Project's environmental impacts are further articulated under *Findings Associated with Significant, Potentially Significant, and Cumulative Significant Impacts that Can Be Mitigated to a Less-than-Significant Level* and *Findings Associated with Significant Impacts that Cannot Feasibly Be Mitigated to a Less-than-Significant Level*, above. The City Council has balanced the project's significant irreversible impacts against the project's benefits and, based on the entire record before it, hereby determines that the identified impacts are acceptable in light of the project's benefits.

Required Findings

Project Benefits Outweigh Unavoidable Impacts

The City hereby finds that the remaining significant and unavoidable impacts of the project are acceptable in light of the following substantial benefits of the project, which constitute the specific economic, legal, social, technological and other considerations that justify the approval of the project.

The GP/LCP Update is intended to function as a policy document to guide land use decisions within the City through the year 2040, consistent with the community vision and guiding principles that serve as the project objectives. Another key objective of the GP/LCP Update is to ensure that the City's land use plan meets the fair share housing needs allocation established in the SLOCOG RHNP. Based on the most recent community outreach and engagement, the GP/LCP Update was prepared with the following vision:

- Provide a safe place
- Maintain the City's small beach town character
- Manage growth effectively
- Enhance a vibrant tourist-based economy, while becoming a world-renowned tourist destination

The GP/LCP Update was built around the following guiding principles:

- **Preserve the Historic Ambiance of Pismo Beach.** The Land Use and Community Design Element sets forth the tools for preservation of historic neighborhood character and retention of the classic downtown setting framed by original landmark architecture and character properties. The historic character provides the setting to attract vibrant downtown uses that serve the needs of residents and visitors.
- **Support the Visitor Population While Enhancing the Quality of Life for all Residents.** The Land Use and Community Design Element provides the tools for

an economy built on visitor-serving uses that balances commercial and residential development. Through protection of existing visitor-serving overnight accommodations, promoting the development of new overnight accommodations, and attracting focused retail and services, the City can best support the visiting population that is so essential to the Pismo Beach economy, while also enhancing the quality of life for residents with a healthy year-round economy. The Land Use and Community Design Element also provides policy for the health and well-being of local residents and visitors alike. These policies strive to be the catalyst for healthy and desirable living environments through the use of design guidelines, appropriate zoning, transit accessibility, and pedestrian and bicycle facilities.

- **Manage Growth Effectively.** To provide a high quality of life for Pismo Beach citizens and visitors and protect the community's natural and coastal resources, the Land Use and Community Design Element strives to provide a high level of service and infrastructure, and plan for new development that is thoughtfully concentrated within its urban boundaries. The Land Use and Community Design Element also provides the tools and incentives for the City to direct new development that responsibly concentrates development in areas where infill and adaptive reuse will contribute to a high quality of life for the entire community.
- **Preserve and Protect Natural Resources.** The Land Use and Community Design Element provides the tools to direct new development to preserve and enhance the natural resources of Pismo Beach, including the ocean and beaches, hills, valleys, canyons and cliffs, and the Pismo and Meadow Creek streams, marsh and estuaries. The Land Use and Community Design Element provides policies that further enhance the requirements provided within the Coastal Act. The Land Use and Community Design Element guides planning decisions in the Coastal Zone that ensure public coastal access, while maintaining coastal preservation and protection.

The GP/LCP Update directs the way in which development in Pismo Beach will occur to accommodate future growth and trends while maintaining the character of Pismo Beach consistent with these objectives.

In this regard, the project objectives of the GP/LCP Update are reflected in the following GP/LCP Update goals:

Land Use

- **Goal LU-1** A community with a variety of well-regulated land uses that support the diverse needs of both visitors and residents.
- **Goal LU-2** A community with a classic California and small-town beach atmosphere.
- **Goal LU-3** City Design. A functional community that is designed with compatible facades, architectural styles, and colors.
- **Goal LU-4** A community economy built on visitor-serving uses while maintaining services for year-round community members.
- **Goal LU-5** A community that supports the health, safety, and sustainability of all residents, visitors and structures.

- **Goal LU-6** A community that provides and maintains a high level of service and infrastructure to all development.
- **Goal LU-7** A community where growth is concentrated in corridors and neighborhood centers where adaptive land reuse will contribute to a high quality of life for the entire community.
- **Goal LU-8** A community that protects and enhances natural and coastal resources within Pismo Beach.

Land Use – Neighborhood Planning Areas

- **Goal LU-9 Sunset Palisades/The Bluffs/South Palisades.** An ocean-oriented residential neighborhood with an emphasis on preservation of natural resources, open space, coastal views and scenic corridors.
- **Goal LU-10 North Spyglass/Spyglass.** A planning area with a mix of visitor-serving hotel uses and a variety of housing types, with access to parks, the beach and neighborhood shopping.
- **Goal LU-11 St. Andrews Tract/Spindrift.** A residential neighborhood where new additions and replacements are compatible with the scale and character of the existing development and where bluff tops, coastal access, trees and bird habitat are protected.
- **Goal LU-12 Shell Beach/Dinosaur Caves**. A planning area focused on conserving the existing housing stock and character and improving the commercial and pedestrian environment of Shell Beach to enhance this beach community.
- **Goal LU-13 Motel District.** A planning area that serves as a key focus for Pismo Beach's visitor-serving industry with special consideration given to retaining and upgrading existing motel uses and preserving ocean views and bluff access.
- **Goal LU-14 Downtown Core.** A vibrant Downtown area that acts as a destination for all, providing motel and hotel uses, as well as supporting uses such as commercial, mixed use, high-density residential, and recreation.
- **Goal LU-15 Pismo Creek/Pismo Marsh.** A planning area oriented to visitor-serving activities, regional commercial uses, mobile home park, industrial and open space with a focus on protecting Pismo Creek, the marsh habitat, and coastal views.
- **Goal LU-16 Oak Park Heights.** A planning area with a mix of residential, open space, commercial and resort commercial uses with a focus on preserving open space, ocean views and views of Oak Park Heights.
- **Goal LU-17 Pismo Heights.** A planning area with a mix of residential housing types, as well as the Frances Judkins Junior High School, the City Hall complex and Boosinger public park.
- **Goal LU-18 Freeway Foothills/Mattie Road.** A planning area with a mix of housing types, open space and commercial uses with an emphasis on preservation of the spectacular views and foothills that provide an important visual and open space backdrop for the entire northern one-half of the City.

Noise

- **Goal N-1** A quiet and healthful environment with minimal noise intrusion.
- **Goal N-2** A pattern of land uses that protects residents and other sensitive receptors from excessive noise.

Conservation and Open Space

- **Goal COS-1** A community that conserves the important natural resources of Pismo Beach for the community's health, safety and enjoyment, including air quality, renewable energy, geology and soils, minerals, water quality and supply, and dark skies.
- **Goal COS-2** A community that protects and enhances scenic roadways and vistas.
- **Goal COS-3** A community that provides and protects a variety of conservation areas such as the ocean and beaches, bluffs, dunes, foothills, marshes, creeks, and wetlands that act as suitable coastal and inland habitat, migratory corridors, and ecologically valuable topography.
- **Goal COS-4** A community that celebrates and protects its historical, tribal cultural, archaeological, and paleontological resources.

Safety

- **Goal S-1** A well prepared and educated community that can quickly and effectively respond to and recover from a hazardous event.
- **Goal S-2** A community that minimizes damage to the public and private property from hazards.
- **Goal S-3** A community that maintains its unique physiographic character, including its sandy and rocky beaches, to conserve soil resources and prevent excessive erosion due to wind and water.

Circulation

- **Goal 1** Provide a circulation system that supports safe and efficient travel for all modes of transportation.
- **Goal 2** Plan and provide pedestrian and bicycle facilities to encourage and meet the walking and bicycling needs of the City.
- **Goal 3** Promote the use of public transit and seasonal shuttle services.
- **Goal 4** Provide connectivity and guidance for safe rail and truck movement of people and goods.

The GP/LCP Update Land Use and Community Design Element directs the way in which development in Pismo Beach will occur to accommodate future growth and trends while maintaining the character of Pismo Beach, consistent with these goals. The Noise Element identifies and analyzes the major noise sources in the community and provides data and guidance to inform a pattern of land uses that minimizes exposure of community residents to excessive noise. The Conservation and Open Space Element guides the protection of natural, scenic, and cultural resources and conservation areas important to the environment and sustained economic prosperity of Pismo Beach. The Safety Element identifies the hazards to Pismo Beach, and presents goals, policies, and actions to increase the City's resilience to hazards through educating citizens,

maintaining an effective emergency response, and protecting life, property, and natural landforms in potential hazard areas. The Circulation Element identifies a comprehensive plan for multimodal transportation improvements that will maintain consistency with the concurrent update of the City's Land Use and Community Design Element.

The mixed-use nature of the GP/LCP Update encourages diversification and development of the City's economic base. Within additional residential uses, there will be additional property tax revenues available that will provide additional benefits. Additionally, within the commercial uses there is a broad diversification of uses that range from the provisions of various types of sales taxes (restaurants, entertainment, etc.) to potential transient occupancy taxes (hotel uses). Further, the GP/LCP Update will provide significant benefits to the City and community in terms of creating both short and long-term employment opportunities for the residents of the City including construction work and long-term jobs in the commercial sector, which are reasonably expected to result in more personal income likely to be spent locally, resulting in additional tax revenues and economic development.

The City has more residents to serve, but the cost of doing so has increased. The City finds that the opportunity to realize additional property, sales and transient occupancy tax revenues is an important consideration for the City.

Consequently, it is reasonably expected that the City and its residents will enjoy the economic and social benefits from the diversity of the economic benefits provided by the GP/LCP Update. This promotes the economic well-being of the City, including the funding of essential services provided by the City.

Each of these benefits provides a separate and independent basis for overriding the significant environmental effects of the GP/LCP Update.

Balance of Competing Goals

The City hereby finds it is imperative to balance competing goals in approving the project and the environmental documentation of the project. Not every environmental concern has been fully satisfied because of the need to satisfy competing concerns to a certain extent. The City has chosen to accept certain environmental impacts because of the many benefits inherent in the attainment of City, regional, and State goals as described above, as well as the implementation of required mitigation measures, would balance the potential for environmental impacts to occur.

The City hereby finds and determines that the project and the supporting environmental documentation provide for a positive balance of the competing goals and that the economic, social and other benefits to be obtained by the project outweigh any remaining environmental and related potential detriment of the project.

<u>Overriding Considerations</u>

Based upon the objectives identified for the project, the City has determined that the project should be approved and that any remaining unmitigated environmental impacts attributable to the project are outweighed by the specific economic, social and other overriding considerations as described above.

The City has determined that any environmental detriment caused by the project has been minimized to the extent feasible through mitigation measures identified herein, and, where not feasible, has been outweighed and counterbalanced by the project's significant social benefits to be generated to the City, its residents, and the region.

Exhibit 1

Mitigation Monitoring and Reporting Program