

# TEMPLETON AREA ADVISORY GROUP (TAAG) NOTICE OF TAAG BOARD MEETING AND AGENDA Thursday August 11, 2022 6:30 PM

Templeton Area Advisory Group (TAAG) has **RESUMED IN-PERSON MEETINGS**  
(No Zoom link for this meeting) at the  
Templeton Community Service District Board Room  
located at 502 Fifth Street  
(Entrance to the right/east of the fire station)  
in Templeton, California

## **2022-2023 TAAG BOARD MEMBERS**

Scott Shirley, Delegate/Chair  
Murray Powell, Delegate/Vice-Chair/Treasurer  
Doris Diel, Delegate/Secretary  
Dede Davis, Delegate  
John Donovan, Delegate  
Jerry Jones, Delegate  
Scott Silveira, Delegate

### **1. CALL TO ORDER**

### **2. PLEDGE OF ALLIGIANCE**

### **2. ROLL CALL**

**3. PUBLIC COMMENT** Members of the public who wish to speak on any topic not on the agenda that is within the purview of the TAAG may approach the podium on being recognized by the Chair. Please state your name (and representation, if any) for the minutes, and limit your comments to three minutes. Per TAAG's Bylaws, no action will be taken on items not on the agenda, though Board members may ask questions of the speaker. When speaking please announce your name and place of residence for our records.

### **4. NEW BUSINESS**

**4.1** This Special TAAG Board Meeting is convened for the sole purpose to consider developing and approving TAAG public comments to be submitted during the Board of Supervisors hearing scheduled for August 23, 2022, when the Board of Supervisors intend to certify the Final Environmental Impact Report (FEIR) issued by the County regarding the development of a SLO Countywide Emergency Service Dispatch Center to be located at the Templeton 101 Hwy – Main Street entrance to downtown Templeton. The Final Environmental Impact Report can be viewed at [Co-Located-Dispatch-Facility-FEIR-Final-Report.pdf](#). The project site is a 5-acre County-owned parcel at 350-358 North Main Street, Templeton (Assessor Parcel Number 040-201-038) that is currently occupied by a County Sheriff Department building, a County Department of Agriculture building, and associated site improvements. An access drive and pedestrian walkway provide access to the site from North Main Street.

This proposed project is intended to consolidate SLO County-wide emergency dispatch functions provided by the County's Sheriff's Office Dispatch Center (currently at the County Operations Center at

Kansas Avenue off Highway 1, northwest of the City of San Luis Obispo) and the California Department of Forestry and Fire Protection and County Fire Department's Emergency Command Center. The facility would serve as the County's primary Public Safety Answering Point to provide dispatch for law enforcement, fire, and ambulance services throughout the unincorporated regions of the SLO County, as well as within the seven incorporated communities. The facility would also serve as a regional emergency response operations headquarters. **This Final EIR supports the County's intent to construct a 140 -160 foot communication tower located at the Templeton 101 Hwy – Main Street entrance to the downtown Templeton area as part of the proposed new project.**

TAAG conducted a publicly noticed October 5, 2021 Special Board meeting and unanimously voted 7 – 0 to submit the 10.5.21 Report to the County (APPENDIX A BELOW) ***“RECOMENDING DENIAL OF THIS CO-LOCATED EMERGENCY SERVICES DISPATCH FACILITY PROJECT'S TEMPLETON MAIN STREET LOCATION BASED ON THE FINDINGS OF THE COMMUNICATION TOWER'S SIGNIFICANT UNMITIGATED UNAVOIDABLE ENVIRONMENTAL IMPACTS PRESENTED IN THE PROJECT'S 240 PAGE DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) FOR THE CO-LOCATED DISPATCH FACILITY PROJECT”*** and other matters of concern with the project. TAAG became aware of additional information that became available on October 7, 2021 regarding an existing 2018 -2038 SLO County Operations Center Master Plan Report prepared by the County in 2017. Appendix B below has an October 11, 2021 letter signed by six of TAAG's Board members as Templeton residents. TAAG was unable to convene a 72 hour publicly noticed Special TAAG Board meeting in time to meet the project's Draft EIR's October 11, 2021 public comment period expiration date.

The primary purpose of this project's EIR process was due to the proposed 140 -160 foot communication tower to be located at the project site's Highway 101 – Templeton Main Street entrance to downtown Templeton. This EIR analysis focuses on the aesthetic impacts of the project, which were determined to have potential significant environmental effects primarily due to the proposed 140 – 160 foot tall communication tower. This Final EIR found the project tower would have unavoidable significant environmental impacts.

The Final Environmental Impact Report is 328 pages. However, the relevant comments regarding the 140 -160 foot communication tower and its visual effects can be found in Appendix C of the FEIR. You should be able to click on any of the report's Table of Contents items on pages 2 through 5 of 328 of the report to take you directly to each Content item. Pay particular attention to the photo simulations posted on Appendix C pages 204-211 of 328. The EIR reports that this tower will be the largest structure visible along the entire SLO County 101 Highway corridor.

## **5. ADJOURNMENT**

### **GUIDELINES FOR PRESENTING PUBLIC COMMENTS**

It is important that all participants conduct themselves with courtesy, dignity, civility, and respect for all parties involved. If you wish to present oral comments, please observe the following guidelines:

1. Identify yourself by your full name (and representation, if any) for our minutes, and speak from the rostrum so other attendees will have the opportunity to listen to the comments. (We do not currently use speaker slips, but we ask that speakers sign in on the list provided at the rostrum so that we can include the names of speakers in the minutes.)
2. Address your comments to the Chair. Conversation or debate between a speaker at the podium and a member of the audience is not permitted.

3. Oral comments should be brief and to the point. Your comments should be about issues, and not about any individuals involved.
4. Public oral comment is limited to three minutes per individual unless the Chair permits otherwise.
5. Please -- no audience reaction (applause or otherwise) during or after comments.
6. Written testimony (letter, e-mail, etc.) is acceptable, but should be distributed to TAAG members at least three days before the meeting.
7. Once the public comment portion of the meeting is closed, there will be no further public oral comments unless requested of and permitted by the Chair.

## **APPENDIX A:**

### **TEMPLETON AREA ADVISORY GROUP**

*Addressing the Area's Land Use Planning Since 1994*

PO Box 1135 Templeton, CA 93465

#### **REPORT TO THE COUNTY**

TO: County Board of Supervisors: John Peschong, Debbie Arnold, Vicki Janssen, Kathleen Goble, Trevor Keith, Cheryl Ku, Geoff English, Steven Neer, Monica Stillman

CC: TAAG Board members

FROM: Bruce Jones, TAAG Board Chair

SUBJECT: Report of significant recommendations during TAAG's Zoom teleconferenced **October 5, 2021 Special** Board meeting to review the DEIR for the Co-Located Emergency Services Dispatch Facility.

TAAG's Project Review Committee identified four areas of concern regarding the Co-Located Emergency Services Dispatch Facility: visual esthetics, transportation, drainage/flood control, and lighting. Documents were prepared by PRC Committee members and Community Members for each of these areas to be reviewed by the TAAG Board.

1. **Visual Esthetics**—Board members Dede Davis and Murray Powell investigated this area of concern. Below are the document recommendations that were unanimously supported by a 7-0 vote by the TAAG Board:

#### **TEMPLETON AREA ADVISORY GROUP (TAAG)**

##### **PROPOSED TEMPLETON AREA CO-LOCATED EMERGENCY SERVICES DISPATCH FACILITY**

##### **COMMENTS AND RECOMMENDATIONS REGARDING THE PROJECT'S**

##### **DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) RECOMMENDATIONS**

This proposed TAAG recommendation is in response to public comments to be submitted to the SLO County Public Works Department in connection with the 240-page Draft Environmental Impact Report (DEIR) regarding the SLO County Co-Located Emergency Services Dispatch Facility located North Main Street Templeton. The 5-acre project site's west boundary borders Highway 101. The Templeton's "Gateway" Highway 101 and North Main Street interchange is approximately 600 feet north of the parcel and has an overpass over the highway. The proposed tower is clearly visible from 101 and the 101 "Gateway" interchange and from many other vantage points in the Templeton area.

This recommendation focuses on the aesthetic visual CEQA environmental impacts of the project's 140 -160 foot Communication Tower with approximately 45 attached antennas (two-way radio antennas, microwave radio antennas, and other associated public-safety-related communications equipment). Antennas attached to the top of the 140-foot-high tower could increase the total height of the structure to 160 feet. The tower will be located within 275 feet of Highway 101 and essentially

adjacent to the 101 – Main Street “Gateway” entrance to Templeton’s historic downtown commercial, residential and tourist area.

**TAAG RECOMMENDS DENIAL OF THIS CO-LOCATED EMERGENCY SERVICES DISPATCH FACILITY PROJECT’S TEMPLETON MAIN STREET LOCATION BASED ON THE FINDINGS OF THE COMMUNICATION TOWER’S SIGNIFICANT UNMITIGATED UNAVOIDABLE ENVIRONMENTAL IMPACTS PRESENTED IN THE PROJECT’S 240 PAGE DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) FOR THE CO-LOCATED DISPATCH FACILITY PROJECT.**

See the DEIR at Co-Located-Dispatch-Facility-DEIR.pdf

This recommendation is essentially based on conclusions reached in the SLO County 240-page Draft Environmental Impact Report. The DEIR has determined that:

The Communication Tower will create significant and unavoidable CEQA Class 1 impacts on aesthetic resources throughout the surrounding areas of Templeton and Paso Robles. CEQA Class 1 impacts are defined as “Significant environmental impacts that cannot be fully mitigated or avoided.” No feasible mitigation or project alternatives are identified at the project site that would reduce the adverse unavoidable visual impacts of the Communication Tower to a less-than-significant level. The visual dominance of the tower and its highly noticeable industrial – utilitarian appearance and visual contrast at its proposed location will result in significant unavoidable impacts to the visual quality and character of the project site, its surroundings and the general area of the project

- The DEIR reports in Table ES-2 (pages ES-14 and 15) the following CEQA Class 1 unavoidable environmental visual impacts of the Tower structure.
  - **Impact AR-1.** The height and location of the communication tower would cause it to be seen extending above the horizon line and interfering with hillside views from public viewpoints in the surrounding area. The most substantial effects would occur for travelers within close range of the project site on Highway 101 and North Main Street. As a result, the project would result in an adverse visual impact to the existing scenic vistas.
  - **Impact AR-3.** Because of the visual dominance of the tower and its industrial-utilitarian appearance, but it would increase noticeability. the project would result in a significant and unavoidable visual impact to the visual quality and character of the project site and its surroundings
  - **Impact AR-5.** If required by FAA, lighting affixed to the communication tower would be visible from widely surrounding areas and would interfere with nighttime views and enjoyment of the night sky from the surrounding community.
  - **Impact AR-6.** Because of the visual dominance of the tower and its industrial-utilitarian appearance, the project would result in a significant and unavoidable cumulative visual impact.

The DEIR has identified significant unavoidable CEQA Class 1 environmental impacts created by the 140-160 foot Communication Tower that cannot be mitigated. The visual dominance of the tower, its highly noticeable exceptional height and contrasting industrial – utilitarian appearance. Its visual contrast and its location at the 101 – Main Street “Gateway” entrance to Templeton’s historic downtown commercial, residential and tourist area will result in significant unavoidable impacts to the visual quality and character of the project site and the general Templeton area. The 140-foot-high Communications Tower, located in close proximity to Highway 101, would be visible to portions of both near-field and far-field views from Highway 101, from North Main Street, and from other local public roads in the region. The DEIR indicates that an estimated 60,000 vehicles traveling on 1010 would pass the project location each day.

The DEIR has determined that the 140-160 foot Communication Tower would cause an irreversible alteration to the scenic character of the site and the surrounding Templeton and Paso Robles area. This change in visual character, when experienced along with the other recent or planned projects in the area, would result in an overall degradation of visual quality along the Highway 101 corridor, along the Main Street “Gateway” entrance to the Templeton historic downtown area and to Northern San Luis Obispo County. Due in great part to the proximity to Highway 101, the adverse visual effects of the Tower would be readily experienced by large numbers of the public. Because of the tower’s height and cluttered profile, the project would be seen from a wide area and would often interrupt views of the scenic hillside backdrop and extend above the primary ridgeline.

Communication Tower lighting would be seen from great distances and would make the exceptional height of the tower noticeable during the nighttime hours, interrupting views of the night sky from the surrounding community and resulting in adverse visual impacts. Based on the tower height and distance to the nearest airport (Paso Robles

Municipal Airport) and helipad (Twin Cities Community Hospital), the Federal Aviation Administration (FAA) MAY require tower orange and white paint markings, white flashing or steady daytime lights, and/or flashing, steady, or air traffic-triggered red nighttime lights. The inclusion of lights at the top and possibly other locations on the tower would be potentially seen from great distances, providing visual evidence of the development during the dark, and potentially reducing enjoyment of the night sky.

The SLO County General Plan provides policies for land use and specific direction for proposed developments within the County. The DEIR concludes that “The proposed communication tower would be inconsistent with the General Plan’s visual resource goals because it would be out of character with the setting, would be silhouetted against the sky from a range of near- and far-field views, and it is not possible to disguise or screen the Tower.”

The North County Area Plan encourages development that is consistent with the North County historical character and heritage. The DEIR misleadingly implies that the inclusion of an industrial size 160-foot Communication Tower on the project site is somehow consistent with North County’s historical character and heritage. **The DEIR states the Tower complies with the North County Area Plans intent which would be implemented in the project design details.** The construction of a massive 160-foot Communication Tower adjacent to highway 101 and downtown Templeton does not meet the definition of development consistent with North County historical character and heritage.

The Templeton Community Plan supplements the County General Plan by providing information on programs that are specific to Templeton. Regarding aesthetics, the Community Plan states: “The north county regional center site is located on a highly visible hill adjacent to Highway 101. Any development should serve as a landmark at the northern entrance to the community. Building architecture would be appropriate that is exemplary of civic functions within the historic context of Templeton.” The DEIR states that “the proposed communication tower would be inconsistent with the Community Plan’s aesthetic screening goals. Screening or buffering of views of the proposed communication tower would not be feasible due to its height.”

The Templeton Community Design Plan is intended to protect the historical character and environmental assets of the community. The Design Plan requires architectural designs fit desired rural, western themes and recommends that developments be designed to be compatible with the natural setting, neighboring properties, and community design goals. Although compliance with the Templeton Community Design Plan is not a requirement of a County project on County-owned land, the County attempts to design projects to be consistent with such Design Plans to the extent feasible. Accordingly, the County has reviewed the proposed project plans to ensure that the project is consistent with the guidance in the Design Plan to the extent feasible excluding the Tower.

The project’s DEIR presents a Visual Impact Assessment study and report issued by the SLO County Public Works Department (DEIR Appendix C). The VIA report states that “development should serve as a landmark at the northern entrance to the Templeton community. Building architecture would be appropriate that is exemplary of civic functions within the historic context of Templeton. It should be complemented by landscaping, with special attention to setbacks from the highway to partially buffer views.” However, the VIA concluded that the conceptual landscaping plan would be insufficient mitigation for the aesthetic impacts of the project when considering the aggregate effects of the communication tower. The VIA comments that “Although the sight of utilities and other communication facilities are not uncommon in rural areas, the scale of the project tower and its close proximity to public roadways, including Highway 101, would make it visually unique and substantially more noticeable. The tower structure would visually dominate the project site as well as the identified community gateway setting. The proposed approximately 45 antennae and supporting elements would intensify the visual clutter and utilitarian appearance of the tower.”

The VIA also comments that “the proposed communication tower would likely be one of the more noticeable and identifiable visual elements along the Highway 101 corridor in the County of San Luis Obispo” and concluded that the conceptual landscaping plan would be insufficient mitigation for the aesthetic impacts of the project when considering the aggregate effects of the communication tower. Although the sight of utilities and other communication facilities are not uncommon in rural areas, the scale of the project tower and its close proximity to public roadways, including Highway 101, would make it visually unique and substantially more noticeable. The tower structure would visually dominate the project site as well as the identified community gateway setting. The proposed approximately 45

antennae and supporting elements would intensify the visual clutter and utilitarian appearance of the tower. The proposed communication tower would likely be one of the more noticeable and identifiable visual elements along the Highway 101 corridor in the County of San Luis Obispo.

Submitted for TAAG Board review

Murray Powell

510-914-3753

TAAG Vice Chair

805-434-0707

\* \* \* \* \*

2. **Transportation**—Community member Dorothy Jennings investigated this area of concern. Below are the document recommendations that were unanimously supported by a 7-0 vote by the TAAG Board:

## **TEMPLETON AREA ADVISORY GROUP**

*Addressing the Area's Land Use Planning Since 1994*

PO Box 1135 Templeton, CA 93465

Draft Environmental Impact Report for the Co-Located Dispatch Facility Project;

SCH# 2020090201; Draft August 2021; Appendix A Notice of Preparation and Response; Page A-40 and A-40

XVII. TRANSPORTATION

*Would the project:*

*(a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?*

Change **No Impact** to **Less than Significant with Mitigation Incorporated**. That is because the following need to be taken under consideration:

In the Draft EIR, the [only] access to the North County Center is the Highway 101/North Main Street Interchange. According to a 2015 traffic study, the interchange operates at LOS C, ramps failing during PM peak hours.

Consistent with the San Luis Obispo County and Caltrans policies, LOS "C" was taken as the general threshold for acceptable/tolerable operations for rural areas, areas within Caltrans jurisdiction, and LOS "D" was taken as the general threshold for areas within the Templeton URL.

TRAFFIC ISSUE # 1. Considering the co-location of critical services such as sheriff office, the impact of the LOS D policy at the interchange and/or its vicinity must be analyzed and addressed. Perhaps the policy should be mitigated as part of this co-located dispatch facility.

TRAFFIC ISSUE #2. The Main Street interchange and/or its vicinity will likely deteriorate below a LOS D before improvements are scheduled. Given these conditions, the impact of emergency events where traffic, "estimated 150 average daily trips" as described in this draft EIR must be analyzed and mitigated.

The Templeton Road Impact Fund (RIF) is currently paying off Certificates of Participation (COP) issued to fund the Vineyard Interchange. In 2008 the RIP incurred a bond debt of \$13 million with a 30-year payoff (2038). This debt (Project 09-01) would have to be cleared before any new obligations. The Templeton Road Impact Fund's participation in the Main Street interchange project (Project 09-02) is about \$10 million. Unless the Highway 101/46 West interchange project (Project 09-03) with \$7 million participation is raised to a higher priority due to unacceptable operations. As a result, Templeton/TAAG will have to decide whether to postpone other eligible road improvements, wait until developer fees accumulate sufficient to meet the \$10 million or \$7 million reserve level, or go back into debt. Regardless, it appears as if there will be no major improvement to the Main Street interchange in the next twenty to fifty years.

TRAFFIC ISSUE # 3. Considering the co-location of critical countywide services, the Templeton RIF's ability to participate necessitates a realistic timeline is prepared and analyzed in order determine mitigations, such as county contributing to the Main Street interchange project funding as part of the co-located dispatch facility project.

*(d) Result in inadequate emergency access?*

Change **No Impact** to **Less than Significant with Mitigation Incorporated**. That is because the following needs to be taken under consideration:

The only access route discussed in this Draft EIR is to and from the Center and Main Street interchange. However, an accident or safety emergency might occur that closes the Main Street interchange and/or Highway 101. Main Street to the south of the Center must be viewed as an "emergency access". Main Street crossing Toad Creek must be traveled regardless of which Highway 101 interchange to the south, Las Tablas or Vineyard, is selected. According to Templeton and Flood Control Study, the storm water capacity of these culverts is between a 5 year and 10-year storm. Improvements are described in the Templeton Circulation Study.

TRAFFIC ISSUE #4. Considering the co-location of critical county-wide services, which include the sheriff office, the need for an alternate emergency access must be analyzed and mitigated, such as providing funding to improve the drainage facility on Main Street at Toad Creek to a 100-year storm water capacity (the highest Public Works standard) as part of this co-located dispatch facility project.

Notes:

1. 2015 Travel Demand Model (TDM) and Circulation Study Update for the Templeton Community Existing Conditions Report; prepared by Omni Means Engineering Solutions; page 12-13
2. Templeton Drainage and Flood Control Study and Project 8 Addendum, Final Report, February 2014, page 34.
3. Templeton Circulation Study, Capital Improvements Projects List, 12-03, Drainage Facility, Main Street at Toad Creek, Existing Deficiency

\* \* \* \* \*

**3. Drainage/Flood Control**—Delegates Bruce Jones and Murray Powell investigated this area of concern. Below are the document recommendations that were unanimously supported by a 7- 0 vote by the TAAG Board:

**TEMPLETON AREA ADVISORY GROUP (TAAG)**

**PROPOSED TEMPLETON AREA CO-LOCATED EMERGENCY SERVICES DISPATCH FACILITY**

**COMMENTS AND RECOMMENDATIONS REGARDING THE PROJECT'S**

**DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) RECOMMENDATIONS**

**SIGNIFICANT ENVIRONMENTAL IMPACTS OF PROJECT STORMWATER DRAINAGE ISSUES**

This proposed TAAG recommendation is in response to public comments to be submitted to the SLO County Public Works Department and other County agencies in connection with the 240-page Draft Environmental Impact Report (DEIR) regarding the SLO County Co- Located Emergency Services Dispatch Facility located North Main Street Templeton. The south boundary of the project site is located in a portion of the Toad Creek watershed that experiences substantial periodic flooding events to adjacent properties to the south and east of the project site and across Main Street. This project and the cumulative effect of the proposed and possible addition of development on this site greatly increase the potential for stormwater runoff and drainage into Templeton's Toad Creek. It is important that there be **no runoff** from this site because of the impact of Toad Creek flooding on offsite property damage in Templeton. Sufficient stormwater retention basins are required on the project to prevent any offsite runoff. An October 4, 2021, from Public Works staff member Monica Stillman indicated that "the project drainage design will be considering up to 50-year storm events; however, a formal drainage plan for the project has not yet been completed." The design of the project's stormwater retention design should be adequate for at least 50-year storm events.

**TAAG DISAGREES WITH THIS DRAFT ENVIRONMENTAL IMPACT REPORT'S DETERMINATION THAT STORM WATER DRAINAGE ISSUES AND POTENTIAL FLOODING IMPACTING TEMPLETON'S TOAD CREEK AREA ARE LESS THAN ENVIRONMENTALLY SIGNIFICANT. TAAG RECOMMENDS DENIAL OF THIS CO-LOCATED EMERGENCY SERVICES DISPATCH FACILITY PROJECT'S TEMPLETON HIGHWAY 101 - TEMPLETON MAIN STREET LOCATION**

This 5-acre project site's west boundary borders Highway 101 and Templeton's Main Street "Gateway" entrance from Highway 101 and the North Main Street interchange. The project site is approximately 600 feet south of the 101 highway overpass. The DEIR recognizes that the project site is located in a portion of the Toad Creek watershed. (DEIR page 3-4). The DEIR can be viewed at this website site link [\\*Co-Located-Dispatch-Facility-DEIR.pdf](#) .

The DEIR concludes that the project would be consistent with the drainage goals of an **undefined and undisclosed Design Plan** on the basis that the project design would follow the County's low impact development strategies (County 2017) to ensure stormwater runoff is adequately retained onsite to prevent exacerbation of down-gradient flood conditions. Additionally, the project would not directly affect any drainage channels, culverts, or floodplain areas.

**THE FOLLOWING COMMENTS ARE PRESENTED AS SUPPORT FOR TAAG'S RECOMMENDATION TO DENY APPROVAL OF THIS PROJECT.**

This TAAG recommendation to deny approval of the project focuses on significant environmental impacts of the project's storm water runoff and drainage issues resulting from the proposed extensive expansion of the project site and the project's detrimental environmental impacts to Templeton's Toad Creek drainage and flooding issues. The California Environmental Quality ACT (CEQA) required a comprehensive CEQA Initial Study that was conducted by SLO County during 2020 . This Study reviewed numerous environmental issues related to the proposed project. The Initial Study documents can be found in the attached DEIR website link above on pages 96-150 of 240. This Initial Study document indicates page numbers A-1 thru A-55. Findings of the Initial Study are intended to form the basis for the DEIR's conclusions concerning potential Environmental Impacts of the project.

The Initial Study considered the project's Hydrology and Water Quality environmental effects in Section X (pages A-31 thru A-34). This section of the Study makes the following various comments referring to the apparent existence of the project's "**low-impact development stormwater design**".

Long-term erosion and siltation concerns from the proposed development would be addressed in the **proposed low-impact development stormwater design**.

The project will increase impervious surfaces at the site. **The project's low-impact stormwater design** would address surface runoff concerns to ensure that the project would not substantially increase the amount or rate of stormwater runoff from the site. **The primary stormwater features would be stormwater detention basins, which would allow runoff from previous areas of the site to percolate into the regional groundwater.**

**The proposed low-impact development stormwater design for the project would ensure that stormwater runoff would not exceed the capacity of the system.** The site is not expected to generate substantial sources of pollution.

Stormwater controls would be used to treat runoff from paved areas and to protect the proposed diesel fuel storage facility in the event of an accidental spill or release.

The project would not directly or indirectly affect the mapped floodplain to the south or any surface waters and would not impede any flood flows.

TAAG's concerns involve the undefined, undisclosed details of the "**project's low-impact stormwater design plan**". The details of this **Low Impact Stormwater Design Plan**. The Initial Study and the DEIR conclude that the project's water related environmental issues concerning drainage and stormwater issues are "less than significant" and that "no further analyses or mitigation measures are required". Requests to the County Public Works Department for a copy of the Plan and other documentation supporting the DEIR's conclusions were ignored.

Of particular interest is the Initial Study's comment above that "**The primary stormwater features would be stormwater detention basins, which would allow runoff from previous areas of the site to percolate into the regional groundwater.**" The DEIR makes the following comment on page 3-4 (page 47 of 240) that "The project site is in a portion of the Toad Creek watershed on the west side of Main Street. **The project would be consistent with the drainage goals of the Design Plan because the project design would follow the County's low impact development strategies (County 2017) to ensure stormwater runoff is adequately retained onsite to prevent exacerbation of down-gradient flood conditions.**" However, the following comments is made on DEIR page 4-2 (page 74 of 240):

“The Initial Study evaluated a conceptual site layout that included the addition of a new stormwater retention basin. Revised analyses confirm that the existing stormwater basin on the parcel is adequate to manage any increase in runoff from the project. Therefore, the proposed stormwater basin has been eliminated from the conceptual site layout plan (Figure 4). The conclusions in the Initial Study pertaining to no significant hydrologic or water quality effects remain valid.”

**The Initial Study and the DEIR do not disclose any information supporting the conclusion that the size of the proposed or existing water retention basin(s) are adequate to manage increased storm water runoff from the project. In other words, the County altered the conclusions of the Initial Study regarding the need for additional stormwater basin(s) without providing any documentation or explanation for overriding the Study’s findings and concluding that an existing water basin is sufficient to prevent stormwater drainage offsite.**

The reference noted above to the “County’s low impact development strategies (County 2017)” appears to refer to a 227-page County Handbook titled “Post Construction Requirements Handbook Strategies for Post-Construction Stormwater Management and Low Impact Development in New Development and Redevelopment.” This handbook can be viewed at the following website Microsoft Word - 001 2014\_01\_09 TOC.doc (ca.gov) . Chapter 3 - Preparing Permit Applications. Page 3-12 of this document requires the submission of a Stormwater Control Plan (SWCP) Application for a proposed project at the time that the project’s Land use Permit application is submitted to Planning for processing and approval. This Chapter then states the following:

“If the Application is approved by Planning, the applicant can proceed in completing the SWCP.” Within 30 days of receipt of project application and SWCP, the application will be evaluated for completeness and, if necessary, additional information will be requested.”

“Once found to be complete, an environmental determination will be made on the application to determine if significant environmental impacts could potentially result from the proposed project. Mitigation measures may be required to reduce impacts to a level of insignificance, or an Environmental Impact Report may be required.”

This indicates that a Stormwater Control Plan (SWCP) should have been produced and submitted to Planning as part of the project’s initial Land Use Permit application submittal process in 2019. A written request was made to SLO County Public Works for a copy of the project’s Stormwater Control Plan (SWCP). This request was rejected with the email reply comment “Thank you for your comments. We will include these in our comments received on the Draft EIR and they will be addressed with the other comments received in the Final EIR.”

It appears that the project’s environmental Initial Study and DEIR determination process have been conducted without complying with the production of a Stormwater Control Plan (SWCP) required by the County’s Land Use Permit application process.

Submitted for TAAG Board review

Murray Powell

TAAG Vice Chair

805-434-0707

**4. Lighting**—Delegate Erik Gorham investigated this area of concern. Below are the document recommendations that were unanimously supported by a 7-0 vote by the TAAG Board:

**TEMPLETON AREA ADVISORY GROUP (TAAG)**

**PROPOSED TEMPLETON AREA CO-LOCATED EMERGENCY SERVICES DISPATCH FACILITY**

**COMMENTS AND RECOMMENDATIONS REGARDING THE PROJECT'S**

**Lighting**

TAAG recommendation, that all lighting proposed for the Templeton area co-located emergency service dispatch facility follow the guidelines set forth by the Templeton-Design Plan. A link to the Templeton- Design Plan is attached below and section V39 is also copied below for reference the Templeton's lighting standards.

Link: <https://www.slocounty.ca.gov/Departments/Planning-Building/Forms-Documents/Plans-and-Elements/Community-Plans/Templeton-Community-Plan.aspx>

**F. LIGHTING, SIGNS, HOURS OF OPERATION AND DRIVE-THROUGH STANDARDS**

**Introduction**

The following are standards that apply to all development subject to a land use permit or any request for a land division within the Templeton Urban Area. These are standards that must be adhered to in all circumstances. Any current violation of the lighting standards shall be brought into compliance within one year of notification by code enforcement.

**Standard V.F.1: Lighting**

All lighting shall be shielded so that neither the lamp nor the related reflector interior surface is visible from any location off site. All lighting, poles, fixtures and hoods shall be dark colored. No exterior lighting shall be installed or operated in a manner that would throw light, either reflected or directly, in an upward direction except for flags or other objects as specified below. Lighting shall further be designed to meet the following specific criteria.

Light trespass at property line. Illumination from light fixtures on residential zoned property shall not exceed 0.1 foot candles, or on business and commercial property shall not exceed 0.5 foot candles.

Illuminated flags or other objects. Fixtures shall use a narrow cone beam of light that will not exceed 5.0 foot candles nor extend beyond the illuminated object.

Architectural and decorative lighting. visible above the building roofline. Upward directed decorative lighting shall not be Externally illuminated building identification signs. Signs shall only use shielded light fixtures mounted on top of the sign structure and will not exceed 1 footcandle reflected at 10 feet.

Outdoor light fixtures. Shall be directed so that there will be no objectionable direct light emissions. Light fixtures near adjacent property may need shielding to prevent light trespass.

Intent: The intent of the following Standard is to assure that the value of the ambiance of the night sky continues in the Templeton Urban Area.

\* \* \* \* \*

TAAG Board recommends that these four areas of concern be addressed and plans for mitigation be included before this DEIR is approved.

Respectfully submitted,  
Bruce Jones, TAAG Chair

## APPENDIX B:

SLO County Public Works Department

SLO County Planning Department

October 11, 2021

Attn: Monica Stillman

Mjstillman@co.slo.ca.us

Transmitted via Email

### **COMMENTS OPPOSING THE LOCATION FOR THE DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) CONCERNING THE TEMPLETON LOCATION OF THE PROPOSED CO-LOCATED DISPATCH FACILITY PROJECT.**

These comments are submitted in connection with the Draft Environmental Impact Report (DEIR) for the above noted proposed Emergency Dispatch Services development project. The undersigned are Templeton Area Advisory Group (TAAG) Board Delegates. These comments are submitted by the undersigned individuals as Templeton area registered voter residents, not as representatives of TAAG due to time constraints that will not allow for a TAAG meeting to approve these comments before the DEIR's public comment expiration date of October 11, 2021 at 5 PM. Please note that the TAAG Board unanimously approved certain recommendations on October 5, 2021 during a Special TAAG Board meeting to review the Templeton location of this project that have already been submitted as DEIR public comments to be considered by the County.

We support the concept of developing this project to improve the County's Emergency Services Communication systems to 21<sup>st</sup> century technology standards but oppose the facility's proposed Templeton location for reasons discussed in this comment letter and the opposing TAAG recommendations submitted to the County on October 6<sup>th</sup>. The project's DEIR arbitrarily rejects consideration of locating the project at the existing County San Luis COC property adjacent to Highway 1 as discussed on DEIR page 6.7 (page 92 of 240) with the following comments:

#### **6.7 Environmentally Superior Alternative**

"As proposed, the (Templeton area) project would result in unavoidable and significant (Class I) impacts as a result of the proposed communication tower, and significant but mitigable (CEQA Class II) impacts from the non-tower components of the project. Any alternative that is environmentally superior would be one that potentially avoids impacts or substantially lessen those impacts and does not introduce new significant impacts or increase the potentially significant impacts that can be addressed with mitigation (Class II). In summary:

- The (existing San Luis) County Operations Center Alternative would have more substantial aesthetic impacts than any of the proposed site due to close proximity to a State designated scenic highway; would require relocation of the Joint Information Center, which would result in increased environmental impacts compared to the proposed project; and would require more complex engineering and construction approaches to address soil conditions that would result in increased project costs and would likely increase environmental impacts. This alternative would potentially have more substantial construction related impacts compared to the proposed project due to the challenging geologic conditions." The DEIR fails to describe in any detail the "substantial aesthetic impacts" to State Scenic Highway 1,

the impacts of the “relocation of the Joint Information Center (JIC)”, the increased project costs incurred due to “more complex engineering and construction approaches to address soil conditions” or “more substantial construction related impacts compared to the proposed project due to the challenging geologic conditions.”

Our following comments are the result of additional information that came to our attention on October 7, 2021 regarding an existing 2018 -2038 SLO County Operations Center Master Plan Report prepared by the County in 2017. This comprehensive 2018-2038 Master Plan Report indicates that the Co-Location Dispatch Facilities and Communication Tower now proposed to be established at the Templeton site are planned to be located on the existing County Operations Center (COC) property located adjacent to Camp San Luis and Highway 1 and would adequately serve the County’s Emergency Service communication needs at least through 2038 from that location. Obviously a considerable amount of time, effort and expense were incurred by the County in producing this 2018-2038 Master Plan Report that presents the concept of locating the proposed Co-Located Emergency Services Facility on the County’s existing COC Highway 1 San Luis property.

The 2018-2038 County Master Plan (pages 17 & 18) makes the following comments:

**EMERGENCY SERVICES**

“The County Office of Emergency Services does not anticipate significant changes in its County Operations Center (COC) operations through 2038, and will continue to use the existing Emergency Operations Center. (EOC). Additional parking will be provided for the EOC as a part of the reconfiguration of Sheriff’s facilities and EOC first floor area that is vacated after construction of the new Co-Located Dispatch facility will be occupied by Emergency Services functions. Pacific Gas & Electric will maintain its presence at the second floor of the EOC. The current, modular Joint Information Center (JIC) will be removed and a new, permanent JIC will be built closer to the COC entrance.

The new JIC is sized to include a call center and a multi-use conference space and expanded parking is provided to accommodate offsite visitors during meetings or briefings. Timing of the new JIC is subject to funds availability and the need to remove the current building to make way for a new Public Works complex.”

**INFORMATION TECHNOLOGY**

“County Information Technology remains at the same location and both the shop building and site expand slightly. A new Communications Tower is installed and a new Communications Vault for microwave and telephone equipment is built, either adjacent to the tower or adjacent to the shop, depending on technical considerations.

The Communications Shop building and site expand toward Kansas Avenue, but leave an un-built site next to the roadway that can continue to be used for construction offices as COC projects are developed. The new Communications Tower is planned as a multifunction antenna set to be shared with the Co-Located Dispatch facility. The new Communications Vault also needs to accommodate Co-Located Dispatch and will be positioned for proximity or separation requirements determined by the specific equipment installed. The timing of the Communications Shop and site expansion is determined by the need to house new equipment and an additional vehicle, as well as the availability of funding. The new tower will need to proceed in time to serve the Co-Located Dispatch building when occupied. The new

Communications Vault must be in place before demolition of the existing vault at the Sheriff's complex to accommodate Jail expansion, but is ideally timed concurrently with installation of the new tower and the related underground infrastructure."

The Master Plan Report presents various site plan design options on pages 8 thru 19. Each of these site plans identifies a "New Co-Located Dispatch Center," an "Expanded IT Communications" facility and a "New Communication Tower" located within the existing Camp San Luis - Highway 1 property area.

The DEIR (page 3) makes the following statements concerning the consideration of the project being located on the County-owned COC Kansas Avenue property off Highway 1.

"The project was originally proposed to be located at the County Operations Center at Kansas Avenue, off Highway 1 Northwest of the City of San Luis Obispo. However, that site presented significant challenges, including the need to relocate other existing facilities at the center, soil conditions, and concerns with the aesthetic impacts of the project for travelers along a portion of Highway 1 that is a State designated scenic highway.

The currently proposed project site is proposed because it is on County-owned land, already houses a County sheriff facility, and provides a suitable location for the communication tower in regard to communication (line-of-sight) with other existing communication towers in the region."

The reasons expressed above justify moving the COC facilities to the proposed Templeton site are laughable.

Soil conditions – The DEIR mentions existing soil conditions as a reason for moving the project from the San Luis COC site to Templeton with references to two 2016 Existing Site Conditions reports. However details of the soil conditions are not described in the DEIR and the two reports disclosing existing conditions are referenced but are not presented in the Master Plan documents and could not be found with an online website search. The County has operated its San Luis Operation Center and countywide communication systems for many years without significant problems related to site soil conditions. The 2018-2038 Master Plan does not mention soil condition problems related to the existing San Luis site.

The Master Plan discusses five options beginning on page 8 followed by five site plan diagrams for these options on pages 9 thru 13; however, the Plan does not describe the existing facilities and related costs for "relocation" of any of the current existing facilities on the San Luis site.

Aesthetic impacts concerning scenic Highway 1 are also not described in the DEIR, but we assume that this is somehow related to a new "Communication Tower." We find it curious that the existing San Luis COC site has provided countywide Emergency Communication Services for years utilizing 60-foot Communication Towers with no apparent concerns that the 60-foot towers are impacting the aesthetic scenic views from scenic Highway 1. Why would a 140 to 160-foot tower be required to serve the new communication facilities at the existing COC San Luis site contemplated by the 2018-2038 County Master Plan if 60-foot towers have provided countywide communication services for many years? The size or height of the "new tower" is not disclosed in the Master Plan.

The Master Plan obviously considers the San Luis Highway 1 project site area as the acceptable expansion site for this proposed Communication Services project.

The 2018-2038 Master Plan's San Luis COC site plan shown on page 22 indicates a "new communication tower." A description of the Tower's size or height is not disclosed in the Master Plan report. Also there are no comments concerning the San Luis site's visual impact of Highway 1 scenic views. Existing communication towers on this site and at the Kansas Avenue site are 60 feet tall, not 140 to 160 feet high as proposed for the Templeton project.

The San Luis Highway 1 COC site location is centrally located in SLO County as compared to the Templeton North County location. Central location of this project would greatly improve access to the COC operations for all SLO County residents and for County staff employed at the site.

Submitted October 11, 2021

Bruce Jones

Templeton Resident

Murray Powell

Templeton Resident

Erik Gorham

Templeton Resident

Doris Diel

Templeton Resident

John Donovan

Templeton Resident

Scott Shirley

Templeton Resident