



**COUNTY OF SAN LUIS OBISPO HEALTH AGENCY**  
**PUBLIC HEALTH DEPARTMENT**

**Michael Hill** *Health Agency Director*

**Penny Borenstein, MD, MPH** *Health Officer/Public Health Director*

April 2, 2020

To: San Luis Obispo Local Agency Formation Commission  
1042 Pacific Street, Suite A  
San Luis Obispo, CA 93401

From: Environmental Health  
Leslie Terry, 805-781-5553, lterry@co.slo.ca.us

A handwritten signature in blue ink, appearing to be "L. Terry".

Proposal: Anx#81 to City of SLO (West Airport Area Fiero Lane – Clarion Court)

LAFCO File No.: 1-R-20

Thank you for the opportunity to comment. This department has completed its review of the application and associated documents for the above-mentioned project proposal and offers the following:

1. San Luis Obispo County Environmental Health Services (EHS) has a primacy agreement with the state of California for the regulation of non-community and small community water systems within San Luis Obispo. At present, EHS regulates the Fiero Lane Mutual Water Co. as a non transient non community water system. Records for the Fiero Lane Water Company date back to 1980. With increasing development over the years within its service boundary, the water company has become unable to reliably provide its users water which is safe for consumption. This system relies on three poorly producing wells, one of which has high levels of nitrates. The system has a treatment system for nitrate removal which has proven inadequate on multiple occasions.
2. Environmental Health has taken multiple enforcement actions including issuing Notices of Violation in 2013, 2014 and twice in 2016 when the water system provided finished water to its users exceeding the nitrate maximum contaminant limit (MCL). Failing to provide water compliant with the nitrate MCL is a violation of Title 22 California Code of Regulations, the California Safe Drinking Water Act and multiple state and federal codes. It should be noted that nitrates pose an acute health concern at certain levels of exposure.
3. This office supported the 2016 Outside User Agreement which allowed the Fiero Lane Water Company to utilize water from the City of San Luis Obispo as its active source and maintain their wells as standby sources. In 2017 this office issued an updated Water Supply Permit noting Fiero Lane Water Company's active source as purchased water from the City of San Luis Obispo. The system has been compliant with regulatory drinking water requirements since the change in source.

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**Environmental Health Services**

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[www.slopublichealth.org/ehs](http://www.slopublichealth.org/ehs)

4. The current proposal for annexation is supported by EHS as it will ensure that water provided to the users within the Fiero Lane Water Company boundary will continue to receive water which is safe and reliable. In addition, the state of California supports water partnerships (including annexations) to reduce the number of small water systems (less than 1,000 connections) in our state. Larger water systems are more resilient to disasters, are better able to adjust to regulatory changes and are best able to perform infrastructure maintenance and replacement due to economies of scale and availability of staffing. Additional state information can be found at:  
[https://www.waterboards.ca.gov/drinking\\_water/certlic/drinkingwater/waterpartnership.html](https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/waterpartnership.html)

May 22, 2020

David Church  
SLO LAFCO  
1042 Pacific Street Suite A  
San Luis Obispo, CA 93401

**Subject: Anx #81 to the City of SLO (AMENDMENT – East Airport Commerce Park – Senn/ Glick)**

Dear Mr. Church:

The San Luis Obispo Council of Governments (SLOCOG) appreciates the opportunity to review the amendment to Annexation #81- East Airport Commerce Park. The State of California and Federal Highways Administration designate SLOCOG as the Regional Transportation Planning Agency (RTPA) and the Metropolitan Planning Organization (MPO), respectively, for the region. While SLOCOG does not have permit or regulatory authority for land use proposals, SLOCOG is responsible for planning the long-term viability of the regional surface transportation system, and for programming funds to achieve the objectives of the adopted Regional Transportation Plan and Sustainable Communities Strategy.

SLOCOG staff review EIRs and Specific Plans to ensure positive outcomes in transportation choices, mobility, circulation, efficiency, safety and connectivity within and between our communities. SLOCOG's [2019 RTP](#) includes a forecasted development pattern and intermodal transportation investment portfolio that meet greenhouse gas (GHG) emission reduction targets specified by the California Air Resources Board. The 2019 RTP includes numerous principles, goals, and policies that were used to prepare the following comments; and is the blueprint for our region's future transportation system. The 2019 RTP strives to accommodate growth while improving quality of life for the region's residents.

The proposed 58.31-acre annexation from the County of San Luis Obispo to the City of San Luis Obispo is part of the City's Sphere of Influence and Urban Reserve area. The zoning would change from Industrial to Business Park, Manufacturing, and Service Commercial. The area is partially built out with about 33 parcels containing approximately 329,003 SF in developed space. SLOCOG would like to see the following transportation additions be considered to align more closely with the 2019 RTP.

Section 9 in the Plan for Services states that previous work completed in the City's Land Use and Circulation Element and Airport Area Specific Plan identify new capital projects needed as a result of the East Side Annexation. The AASP states that the South Higuera Street interchange is the designated truck exit accessing the industrial areas in southern San Luis Obispo and recommends the extension of Buckley Road to South Higuera Street, and the designation of Buckley Road as a truck route.

The 2016 State Route 227 Operations Study identifies the existing (2015) and forecasted (2025 and 2035) AM & PM intersection level of service for Buckley Road/SR 227 and Farmhouse Lane/SR 227. Both intersections are expected to operate at unacceptable levels of service in those time frames (Target LOS = C):

2015	AM		PM	
	Delay (sec.)	LOS	Delay	LOS
Buckley @ SR 227	53.9	D	39.1	D
Farmhouse @ SR 227	27.2	D	15.1	C

2025	AM		PM	
	Delay (sec.)	LOS	Delay	LOS
Buckley @ SR 227	57	E	58.8	E
Farmhouse @ SR 227	35.4	E	30.2	D

2035	AM		PM	
	Delay (sec.)	LOS	Delay	LOS
Buckley @ SR 227	64.2	E	101.4	F
Farmhouse @ SR 227	51.7	F	173.2	F

The study makes a number of recommendations for the Buckley Road and Farmhouse intersections with SR 227:

Immediate:

- Coordinate with Caltrans to develop roundabout layout and preliminary engineering designs for SR 227 at Buckley Road and a preferred project development process for expediting the SR 227 at Buckley Road roundabout (*in progress*).
- Proceed with development of layout and preliminary engineering designs for Edna-Price Canyon Trail from Crestmont Drive to Tank Farm Road based on the Preferred Alignment and associated recommendations of the Edna-Price Canyon Trail Feasibility Study adopted by SLOCOG.

Short-term (0-5 years):

- Buckley Road/SR 227 – convert to multilane roundabout (widening at 200 feet plus taper from up/down stream of intersection, including signage, illumination, and striping for pedestrian/bike crossings). This roundabout would include City of San Luis Obispo Gateway signage and treatments (*construction funding programmed*).
- Install rumble strip along the SR 227 outside travel lanes between Airport Drive and Price Canyon Road with breaks/gaps provided near bus stops and pull-outs.
- Airport Drive: close off access to SR 227 and realign west leg of Airport Drive with Farmhouse Lane to provide new access to SR 227 at Farmhouse Lane. This realignment would not reduce access to the airport.
- Convert SR 227/Farmhouse Lane to a four-legged intersection (convert to two-way stop control in interim).

Mid-term (5-10 years)

- Construct Edna-Price Canyon Trail from Crestmont Drive to Tank Farm Road on the Preferred Alignment adopted by SLOCOG (cost not reflected).

Long-term (10-20 years)

- Farmhouse Lane/SR 227 – convert to multilane roundabout (widening at 200 feet plus taper from up/down stream of intersection, including signage, illumination, and striping for pedestrian/bike crossings).

Considering that the site is pre-zoned *Business Park, Manufacturing, Service Commercial*, that the South Higuera Street interchange at U.S. 101 is the designated truck exit for the industrial areas in southern San Luis Obispo, including this site, and that the AASP recommends the extension of Buckley Road to South Higuera and the designation of Buckley Road as a truck route, its likely truck and commuter traffic accessing the annexation site from U.S. 101 will re-route from Tank Farm Road to Buckley Road (shortest/fastest path), further impacting current intersection operations at

Buckley, forecast intersection operations at Farmhouse Lane, and multi-modal level of service (MMLOS) for Buckley Road segment between South Higuera and SR 227, and the future intersection MMLOS of Buckley Road and South Higuera Street.

**SLOCOG recommends that as part of this annexation, the city conduct a full signal warrant analysis for the Buckley Road and Farmhouse Lane intersections with SR 227, make reference to the improvements identified in the State Route 227 Operations Study, and to make available a fair-share apportionment of the City's Traffic Impact Fees generated due to the annexation toward the development or construction of the aforementioned projects.**

Thank you for providing SLOCOG the opportunity to review and comment on the annexation and we wish you and all those involved success in moving the Project forward. For any questions, please do not hesitate to contact me at (805) 788-2104 or [SHanamaikai@slocog.org](mailto:SHanamaikai@slocog.org).

Sincerely,

A handwritten signature in black ink that reads "Stephen Hanamaikai". The signature is written in a cursive, flowing style.

Stephen Hanamaikai, Transportation Planner  
San Luis Obispo Council of Governments

**Study Links:**

[Final State Route 227 Operations Study](#) and [Technical Appendices](#).