

**PLAN MORRO BAY
DRAFT COMMUNITY BASELINE ASSESSMENT**

Comments and Analysis

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Chapter 1: Introduction

1. Are there any inaccuracies?

None identified.

2. Is anything missing?

a. "Purpose" – The purpose of the Community Baseline Assessment (CBA), as set forth in Chapter 1.2, lacks two important characteristics: dynamism and relevance. According to Chapter 1.2:

"The CBA presents historical and existing conditions in the planning area" and

"Specifically, the CBA presents a broad review of the available information about historical and existing conditions in and adjacent to the City of Morro Bay"

These descriptions appear to envision the CBA as a mere compilation of current and past data.

With respect to the current state of the City, it would seem intuitive that a comprehensive knowledge of current conditions is a necessary and desirable foundation for constructing effective and appropriate planning documents. Historical information, however, should be presented in context and with specific objectives in mind. Such data is useful only if it provides perspective, identifies trends which have shaped our community and are likely to remain relevant in the future, or defines social, political, economic, or other factors which will influence the City during the planning horizon for the updated General Plan and Local Coastal Plan.

The CBA, therefore should be committed to:

- *Dynamism* – Presentation of historic and current information in a manner that illustrates not only present conditions within the City, but also how those conditions have evolved. Analysis should be included that clearly and explicitly identifies past and continuing trends and explores the social, political, economic, regulatory and other factors which contribute toward such trends. Historic and current information should not be presented as mere data sets. Rather, the dynamic and evolutionary aspects of the material should be emphasized.
- *Relevance* – Provision of explicit explanations of the relationships between historic trends, current conditions, and existing planning documents (General Plan, Local Coastal Plan, Zoning Ordinance) and of the potential implication of presented data for formulation of the Community Vulnerability and Resilience Assessment (CVRA), General Plan, and Local Coastal Plan.

b. "Priority Issues and Assets" – Chapter 1 provides no definition of the terms "Priority Issue" or "Priority Asset", nor does it define the process by which priority issues and assets are derived from presented baseline data. Consequently, the relevance of the presented data is, again, not readily apparent.

The Community Baseline Assessment will:

- Present a comprehensive review of available information about existing conditions in and adjacent to the City of Morro Bay
- Review and analyze relevant historical data in a manner which provides an understanding of how these existing conditions have come to be and identify trends which may be predictive of the status of the City and surrounding area in the future, extending to and beyond the planning horizon for the City's General Plan and Local Coastal Plan update.
- Determine social, political, economic, and other driving factors that have contributed to identified trends and which may of consideration in formulating the City's revised General Plan and Local Coastal

Plan.

- Compare existing conditions within and adjacent to the City with the current planning documents to determine the degree to which the present status is or is not in conformity with General Plan, Local Coastal Plan, and Zoning Ordinance and provide an analysis of the reasons for any non-conformity that is found.

c. **Figure 1.1, page 1-2** – This figure would seem to make more sense if inverted:



3. Are the priority issues identified at the end of each chapter the right issues on which to focus?

Not applicable.

4. More generally, is there anything you would change?

a. Modify the first sentence of the second paragraph of Chapter 1.2 to read as follows:

“The Community Baseline Assessment will:

- present a broad review of available information about existing conditions in and adjacent to the City of Morro Bay,
- review and analyze relevant historical data in a manner which provides an understanding of how these existing conditions have come to be and identify trends which may be predictive of the status of the City and surrounding area in the future, extending to and beyond the planning horizon for the City’s General Plan and Local Coastal Plan update,

- determine social, political, economic, and other driving factors that have contributed to identified trends and which may of consideration in formulating the City’s revised General Plan and Local Coastal Plan, and
 - compare existing conditions within and adjacent to the City with the current planning documents to determine the degree to which the present status is or is not in conformity with General Plan, Local Coastal Plan, and Zoning Ordinance and provide an analysis of the reasons for any non-conformity that is found.”
- b. Provides definitions of the terms “Priority Issue” or “Priority Asset” and define the methodology by which priority issues and assets are derived from presented baseline data.

Chapter 2: Air Quality and Greenhouse Gas Emissions

1. Are there any inaccuracies?

- a. **Page 2-2** – The Morro Bay-San Luis Obispo area is subject to onshore winds much more often than offshore.
- b. **Page 2-3** – Carbon monoxide does not cause reduced lung capacity.
- c. **Page 2-3** – Nitric oxide (NO) is not a form of NO₂.
- d. **Page 2-6** – The statement that “However, no such facilities are located in Morro Bay” does not seem to be accurate, as the City does contain a freeway.
- e. **Page 2-7** – The statement that “No other common sources of TACs listed in Table 2.1 are present in Morro Bay” does not seem to be accurate, as the City does contain a freeway.
- f. **Page 2-7** – Table 2.1 should specify that the recommended setback distance of 300 feet is for large gasoline dispensing stations (>3.6 million gal/yr). The recommended setback for typical gasoline distribution centers is 50 feet.
- g. **Page 2-9** – It appears that the superscript for “Particulate Matter <10 microns” should be “1”, rather than “a”.

2. Is anything missing?

- a. **Page 2-6** – The CBA should define the term “sensitive land use” (i.e., residences, schools, day care centers, playgrounds, and medical facilities).
- b. **Page 2-7** – The CBA should indicate whether any existing sensitive land uses are sited within the recommended setback distance from sources of toxic air contamination (the freeway, the dry cleaning facility, or any gasoline service station) and should identify such sites, if present.
- c. **Page 2-7** – The CBA should indicate the circumstances under which screening distances for potential nuisance odors may be applicable (“If a project has the potential to cause an odor or other nuisance problem which could impact a considerable number of people, then it may be considered significant. A project may emit a pollutant in concentrations that would not otherwise be significant except as a nuisance. Odor impacts on residential areas and other sensitive receptors warrant the closest scrutiny, but consideration should also be given to other land uses where people may congregate, such as recreational facilities, work sites and commercial areas.”)
- d. **Page 2-7** – The CBA should identify any areas in which sensitive land uses are located within the recommended screening distance from the coffee micro-roaster, the wastewater treatment plant, or any auto body shop.
- e. **Pages 2-10 and 2-11** – It is unclear how these general comments apply to Morro Bay, specifically. For example, are any businesses in Morro Bay subject to the requirement for retrofit control technology and, if so, has such retrofits been accomplished?
- f. **Pages 2-16 through 2-27** – To provide a more understandable picture of Morro Bay’s current status with regards to efforts at greenhouse gas emissions, the CBA should indicate the extent to which each of the

performance indicators set forth in the 2014 Climate Action Plan had been accomplished at the time of the 2015 audit, and the additional GHG reductions that are projected to occur by 2020 as a result of fully implementing the GHG. In the absence of such an analysis, it is impossible to know whether Morro Bay is or is not on schedule to meet the desired 2020 reductions in GHGs, and the conclusion put forth in the Priority Findings for this chapter that “The City will need to prioritize GHG strategies to hasten the pace of reductions in order to meet CAP goals...” is not factually supported.

3. Are the priority issues identified at the end of each chapter the right issues on which to focus?

- a. Potential exposure of sensitive land uses to toxic air contamination (TAC) and/or nuisance odors** – If the analyses called for above (Question 2, items b.) and c.) indicate that residences or other sensitive land uses are, in fact located closer to sources of TAC or nuisance odor than recommended by the California Air Resources Board, this fact should be included as a Priority Finding.
- b. Increasing air pollution and GHG emission by motor vehicles** – The data presented in this Chapter appear to indicate that on-road motor vehicles are the single greatest contributor to GHG emissions in Morro Bay, and that, unlike the case with every other source of GHG, emissions from motor vehicles have increased between 2005 and 2015. In addition, the true contribution of on-road transportation to air pollution appears to be underestimated due to the fact that the many vehicles that pass through Morro Bay on Hwy. 1 and Hwy 41 are excluded from consideration. This should be considered a Priority Finding.
- c.** The Priority Findings labeled “Toxic Hot Spots” and “Limited Stationary Sources” seem very similar and could probably be combined.

4. More generally, is there anything you would change?

- a.** Include a map showing the location of existing “toxic hot spots” and of nearby sensitive land uses.
- b.** Include a map showing the location of existing “nuisance odor sources” and of nearby sensitive land uses

Chapter 3: Coastal Resources and Resilience

1. Are there any inaccuracies?

None identified.

2. Is anything missing?

- a. Impact on fisheries** – It seems odd that the CBA does not include a discussion of the anticipated impact of sea level rise/ocean warming on the fishing industry and on the function of the harbor as a safe haven for vessels.
- b. Sea Level Rise Hazard Maps for 2100** – Given the fact that preparations for the maximum anticipated impacts of sea level rise should begin within the planning horizon of the current GP/LCP update, a visual representation of year 2100 hazards would seem useful.

3. Are the priority issues identified at the end of each chapter the right issues on which to focus?

Generally, the identified Priority Issues seem appropriate, though the three paragraphs of text that follow the table may be unnecessary.

4. More generally, is there anything you would change?

See above.

Chapter 4: Cultural and Paleontologic and Mineral Resources

1. Are there any inaccuracies?

None identified.

2. Is anything missing?

- a. **Cultural Background** – The entire section entitled “Cultural Background” seems to be merely a recitation of facts concerning the prehistory and history of the area. What is missing here is any sort of analysis that established the usefulness or relevance of this information to the update of the GP/LCP.
- b. **Cultural Resources** – This section indicates that “the city likely contains built-environment resources over 45 years of age that may be considered significant or require further evaluation”. An inventory of such structures would be extremely relevant to the update of the GP/LCP and to the subsequent revision of the City’s Zoning Ordinance. Remarkably, however, no such inventory has been included.

Within the downtown area of Morro Bay and, to a lesser extent, the Embarcadero historic signs add greatly to neighborhood character and charm. The CBA should acknowledge the value of these legacy signs and include an inventory of same.

- c. **Paleontological Resources** – This section indicates that vertebrate fossils have been found in the Pismo Formation and that deposits of Quaternary older alluvium are often rich in fossils. Figure 4-1, however, illustrates that neither of these exist within the City of Morro Bay. It is incumbent on the CBA to show the relevance of this section to the GP/LCP update process.

3. Are the priority issues identified at the end of each chapter the right issues on which to focus?

In contrast to other chapters in the CBA, the Priority Issues listed for Chapter 4 are extremely vague. In effect, they do not represent a “baseline assessment” at all, but merely statements that no baseline assessment has been performed.

4. More generally, is there anything you would change?

This chapter needs to be extensively reworked to provide an actual assessment of the cultural, archaeological, and paleontological resources that exist in Morro Bay, as opposed to a general discussion of area history and the science of geology. Specific, fact-based Priority Issues should be based on that assessment, rather than on speculation about what “may exist” or “could be identified”.

Chapter 5: Economic Conditions and Market Trends

1. Are there any inaccuracies?

- a. **Table 5.1, page 5-1** – The population information listed in this table for the year 2010 is an actual count of population from the U. S. Decennial Census, while the figures for 2015 are estimates from the California Department of Finance. The purported growth rate for Morro Bay’s population, (4% over 5 years, or 0.8% per year), therefore, is determined by comparing apples to oranges. Such selective use of data is clearly inappropriate.

The most accurate available figures for population are those from the U. S. Census, which are as follows:

Growth in Morro Bay Population, 1970-2010

Source: United States Decennial Census, 1970 to 2010

Census Date	Population	Percent Change (per decade)
1970	7,109
1980	9,064	+27.5%
1990	9,664	+6.6%
2000	10,350	+7.1%
2010	10,234	-1.1%

For more recent data, one must rely on estimates. According to the Census Bureau’s American Community Survey, the population of Morro Bay and California, 2010 to 2014, is estimated as:

Growth in Morro Bay and California Populations, 2010-2014

Source: American Community Survey, 2010 and 2014

Date	Population	
	Morro Bay	California
2010	10,255	36,637,290
2014	10,383	38,066,920
Percent Change (per year)	+0.31%	+0.97%

Utilizing estimates from the California Department of Finance yields the following:

Growth in Morro Bay and California Populations, 2010-2014

Source: American Community Survey, 2010 and 2014

Date	Population	
	Morro Bay	California
2010	10,350	37,223,900
2014	10,640	38,907,642
Percent Change (per year)	+0.56%	+0.90%

From the above, it is apparent that a.) there are no credible data or estimates that suggest population growth in Morro Bay is exceeding, or even keeping pace with population growth in the State as a whole and b.) for all intents and purposes, the population of Morro Bay in 2015 was not significantly different from what it was in 2000.

- b. Page 5-2** – It is misleading to state that the percentage of the population that is of working age in Morro Bay is “slightly above the state average”. Given the margin of error of American Community Survey estimates, the state figure (53.1%) and the figure for Morro Bay (56.2%) are statistically identical.

- c. **Pages 5-11 and 5-12** – This discussion of the relationship between job growth and population is only valid if the number of jobs *available* to the residents of a given community is equal to the number of jobs *in* the community. In Morro Bay, however, this is not the case. Many of our residents actually work in San Luis Obispo or other areas of the county, and many of the jobs in the City are filled by workers who live elsewhere. This fact is evident from Tables 5.10 and 5.11, which show that Morro Bay has 4,800 employed residents, but only 2,973 local jobs. Obviously, at least 1,827 residents of our community work outside of the City.

In this situation, the ratio of job growth to population growth is not a valid indicator of the economic health of the City. Imagine, for example, that Ford decided to open a large automobile assembly plant in Cayucos. The employment picture for Morro Bay would be greatly impacted by such a development, even though the number of jobs in the City would not have changed a bit.

The data is further flawed by the fact that no tests of statistical significance were performed. In the absence of such validation, it must be considered highly likely that the reported two percent decline in jobs is merely a meaningless random fluctuation. To examine this further, data provided for ZIP code 93442 was examined for the years 2004 through 2014, and the following were noted:

- **Number of jobs in ZIP code 93442** - The number of jobs in the 93442 ZIP code during this interval varied from 2875 to 3437. The mean number was 3096.64 with a standard deviation of 164.50 and a 90% confidence interval of 2826 to 3367. The most recent job figure (2014) was 3036, well within the 90% confidence interval. The correlation coefficient (r) between year and job number was -0.2688, indicating no correlation between these two variables (i.e., no trend in job numbers over time).
- **Number of employers in ZIP code 93442** - The number of employers varied from 380 to 420. The mean was 392.27 with a standard deviation of 12.34 and a 90% confidence interval of 372 to 413. The most recent figure (2014) was 384, well within the 90% confidence interval. The correlation coefficient (r) between year and number of employers was -0.3962, indicating no correlation between these two variables.

The assertion that Morro Bay's economy is stagnant or declining is, in addition, contradicted by:

- A recent poll conducted by the Morro Bay Chamber of Commerce, in which 60% of business owners reported that their business is increasing, and only 11% reported a decline.
- According to the California Controller's Office, transient occupancy taxes collected in Morro Bay rose by 46.4% during the decade between 2004 and 2014 (after adjustment for inflation).

- d. **Page 5-24** – It seems that the reference on this page should be to Table 5.17, rather than 5.16.

- e. **Pages 5-24 and 5-25** – The suggestion that the Morro Bay market area can support an additional 552,489 square feet of retail space (Table 5.17) is extremely misleading. In the first place, over 60% of the "potentially supportable space" is attributable to "general merchandise stores". This category includes department stores, discount department stores, national chain stores, warehouse stores and superstores, and miscellaneous general merchandise stores. It is virtually certain that the majority of the "leakage" in this category is due to shoppers from the Morro Bay market going to Costco, Target, Walmart, and other "big box" stores. On the high end, some residents from our area may be occasionally shopping at Nordstroms, Macy's, or other full service department stores. Since it is not conceivable that the population of the area between Los Osos and Cambria will, in the foreseeable future, be sufficient to attract a Walmart or a Nordstroms (and it is unclear whether such an establishment would be acceptable to local residents), so this 332,582 s.f. of "potentially supportable space" is pretty much a pipe dream. The second largest category, in terms of the amount of "leakage" is "apparel, accessories". While it is feasible to locate additional clothing and jewelry stores in the Morro Bay market area, it is questionable whether the population base is sufficient to support a full-service shoe store. The "leakage" reported in the category "specialty food stores" is most likely due to Trader Joe's, another franchise that would not be supportable by the population of the Morro Bay market area.

Although no calculations of data spread ("margin of error") are provided, it is unlikely that the small "potentially supportable space" figures reported for the categories "convenience stores" and "restaurants, bars" are statistically significant.

The potential impact of online shopping on the estimates given in Table 5.17 should also not be minimized. According to the U. S. Census Bureau, approximately 8% of all retail sales now occur over the internet, and the proportion is increasing by 1/2 percent annually. If this trend continues, by the end of the 30-year GP/LCP planning horizon, nearly a quarter of all retail trade will occur online. In addition, several of the merchandise/service categories where significant “leakage” is reported (i.e., “apparel, accessories”, “sporting goods, hobby, book, music”, and “home furnishings”) are areas in which online merchandising has been particularly aggressive.

These factors render any quantitative estimate of “potential supportable” retail space highly speculative, at best. The most that can be said here is that, in the Morro Bay market area, there may be opportunity for additional retail establishments in the categories of “apparel, accessories”, “sporting goods, hobby, book, music”, and “home furnishings”, but the degree of unmet demand cannot be accurately quantified.

- e. **Pages 5-25 through 5-33** – Odd numbered pages are mislabelled as “6-XX”, rather than “5-XX”.
- f. **Pages 5-27 through 5-30** – These pages appear to profile the population living in Morro Bay’s “market area”. While this information may be of interest to business owners or entrepreneurs, it is very difficult to see how it is relevant to or will inform the GP/LCP update process.

2. **Is anything missing?**

- a. **Consideration of housing affordability** – A lack of decent, affordable housing is one of the most significant economic issues facing Morro Bay residents. Currently, sixty-two percent of renters and forty-five percent of homeowners with a mortgage are in housing which is not affordable (i.e., are paying more than 30% of household income for housing). Clearly, a discussion of housing costs should be a major component of the baseline assessment of economic conditions in the City.
- b. **Consideration of homelessness** – Homeless individuals and families have become an increasing component of community life in Morro Bay. If the CBA purports to document baseline economic conditions in the City, an examination of the most disadvantaged segment of our population is certainly warranted.
- c. **Consideration of the adequacy of the employment-related safety net in Morro Bay** – Traditionally in the United States, employment has carried with it an economic safety net that has included a pension or profit-sharing plan, health and dental insurance, and provisions for support in case of disability. In a visitor-serving economy, however, employment tends to be somewhat more casual and these important benefits may or may not be included. A significant aspect of the baseline assessment of economic conditions in Morro Bay, therefore, would be an evaluation of the degree to which our residents are exposed to financial risk as a consequence of an inadequate or non-existent employment-related safety net.
- d. **Consideration of a possible Morro Bay living wage**

3. **Are the priority issues identified at the end of each chapter the right issues on which to focus?**

- a. **Stagnant economy** – As discussed in detail above, the assertion that Morro Bay’s economy is “stagnant” is based on the false assumption that employment opportunities for Morro Bay residents are limited only to jobs which are located within the City. In addition, a careful review of statistics from the U. S. Census Bureau shows that, in fact, there is no downward trend in either the number of jobs or the number of employers in the City. The proposition that Morro Bay’s economy is “stagnant” is not even a valid finding, let alone a Priority Finding.
- b. **Market surplus and leakage** – The proposition that the Morro Bay market area could support an additional 552,489 is, on careful analysis, unsupportable. Although this figure appears to have been “spit out” by a mathematical manipulation of sales figures, the types of facilities that would be needed to capture even a fraction of the retail “leakage” could not, in the foreseeable future, be supported by the population within the market area. In addition, it is questionable whether the residents of Los Osos, Morro Bay, Cayucos, or Cambria would welcome the placement of a Walmart or a Costco in

their community. The idea that these small communities could conceivably support anywhere near a half-million square feet of additional retail space is simply out of touch with the real world and should absolutely not be considered a Priority Finding.

- c. **Market segments** – As currently written, the CBA gives no indication as to how this information might actually be relevant to the process of updating Morro Bay's GP/LCP. Until such relevance can be shown, this should not be included as a Priority Finding.
- d. **Housing affordability** – The fact that, in Morro Bay, 60+% of renters and 45+% of homeowners with a mortgage are struggling with unaffordable housing costs is a major economic issue and should clearly be a Priority Finding. The CBA should recognize that, according to RealtyTrac, San Luis Obispo County is the sixth lowest county in the nation with respect to housing affordability and should identify and analyze the factors that are responsible, so that this issue can be addressed in the GP/LCP.

4. **More generally, is there anything you would change?**

This Chapter is disappointing. It is essential that information included in the CBA be carefully analyzed and critically validated before inclusion in the document. In addition, the discussion of economic conditions should include those issues that are of concern to Morro Bay citizens, not only to businesses.

Chapter 6: Infrastructure and Public Services

1. **Are there any inaccuracies?**

- a. **Page 6-3** – The statement "Disposal rates are reported for the San Luis Obispo IWMA, and are not separated by jurisdiction." is not accurate. Disposal rates for Morro Bay and other communities in San Luis Obispo County are available for the years 1995 through 2015 at <http://www.calrecycle.ca.gov/LGCentral/Reports/Viewer.aspx?P=ReportName%3dExtEdrsMultiYrCountyWide%26CountyID%3d40>.

2. **Is anything missing?**

- a. **Waste and recycling** – The PaintCare program for recycling of latex and oil-based paints should be included here. Existing locations within the City of Morro Bay for recycling of batteries and fluorescent bulbs, paint, and used motor oil should be documented.

In February of 2016, all CRVS redemption centers in the City of Morro Bay closed. This has a marked impact on recycling of aluminum and plastic beverage containers and should be discussed in the CBA.

- b. **Water supply** – Morro Bay residents are currently facing significant increases in both water and sewer rates. The potential impacts of such increases on the City's economy and on the financial well-being of residents should be discussed.
- c. **Water infrastructure, page 6-7** – The current status of the City's "extensive pipeline replacement program" should be documented.
- d. **Wastewater facilities, page 6-9** – The current status of the City's "ongoing storm drain improvements and "ongoing maintenance and repair of sewer pipelines" should be documented.
- e. **Wastewater facilities, page 6-9** – The current status of the City's "ongoing storm drain improvements and "ongoing maintenance and repair of sewer pipelines" should be documented.
- f. **Energy, electricity, page 6-10 and 6-11** – It should be noted that the current above-ground utility lines detract from the visual appeal of the community and are vulnerable to service interruptions caused by weather and falling tree limbs.
- g. **Police protection, page 6-14** – The Morro Bay Police Department Annual Report for 2014 indicates that the Department responded to 12,959 calls for service during the year. When the categorized calls are totalled, however, only 3,903 calls are documented. This discrepancy needs to be explained.

Is it possible that only 70 traffic citations were issued in an entire year?

- h. **Schools** – For GP/LCP purposes, one of the most important pieces of information regarding schools

Percentage of Households Spending More Than 30 and 35% of Income for Housing
 American Community Survey, 2014

Area	Households Spending More Than 30% of Income for Housing				Households Spending More Than 35% of Income for Housing					
	Owner-Occupied Units ¹			Rented Units ²	Owner-Occupied Units ¹			Rented Units ²		
	All	With a Mortgage	Without Mortgage		All	With a Mortgage	Without Mortgage			
Coastal Communities										
Cambria CDP	33.8%	52.3%	10.5%	59.2%	40.6%	26.1%	39.0%	9.8%	52.1%	33.1%
Cayucos CDP	32.6%	43.1%	21.6%	55.9%	40.4%	22.6%	25.9%	19.1%	49.3%	31.5%
Grover Beach	35.8%	48.1%	8.9%	57.9%	48.4%	25.2%	34.1%	5.8%	51.8%	40.5%
Los Osos CDP	37.9%	47.2%	15.3%	59.8%	45.4%	25.1%	31.1%	10.5%	51.2%	34.0%
Morro Bay	31.9%	45.0%	12.1%	57.4%	44.7%	20.3%	28.8%	7.5%	53.2%	36.7%
Oceano CDP	29.4%	40.8%	14.2%	62.2%	44.1%	23.0%	33.0%	9.5%	56.1%	37.8%
Pismo Beach	31.4%	52.4%	10.0%	54.1%	41.9%	25.4%	44.5%	5.9%	43.8%	33.9%
Inland Communities										
Atascadero	40.5%	48.0%	14.4%	53.1%	44.9%	30.7%	36.3%	11.4%	41.8%	34.6%
Nipomo CDP	45.0%	52.9%	18.8%	59.6%	49.1%	38.0%	45.2%	13.8%	49.4%	41.1%
Paso Robles	38.5%	46.1%	15.2%	49.0%	43.2%	31.6%	37.1%	14.7%	36.6%	33.8%
San Luis Obispo	32.7%	39.9%	16.2%	65.9%	53.3%	25.0%	31.1%	12.5%	59.7%	46.5%
Templeton CDP	33.9%	42.7%	9.0%	42.7%	36.2%	27.2%	33.6%	9.0%	41.1%	30.8%
San Luis Obispo Co.	37.2%	47.7%	14.4%	58.3%	45.7%	28.6%	36.4%	11.6%	49.5%	37.0%
California	37.6%	45.7%	15.1%	57.2%	46.3%	29.5%	35.8%	12.0%	47.8%	37.6%

¹ Data tabulated for selected monthly owner costs (SMOC) compared to monthly income. Selected monthly owner costs are the sum of payments for mortgages, deeds of trust, contracts to purchase, or similar debts on the property (including payments for the first mortgage, second mortgages, home equity loans, and other junior mortgages); real estate taxes; fire, hazard, and flood insurance on the property; utilities (electricity, gas, and water and sewer); and fuels (oil, coal, kerosene, wood, etc.). It also includes, where appropriate, the monthly condominium fee for condominiums and mobile home costs, such as personal property taxes, site rent, registration fees, and license fees.

² Data tabulated for gross rent compared to monthly income. Gross rent is the contract rent plus the estimated average monthly cost of utilities (electricity, gas, and water and sewer) and fuels (oil, coal, kerosene, wood, etc.) if these are paid by the renter (or paid for the renter by someone else). Gross rent is intended to eliminate differentials that result from varying practices with respect to the inclusion of utilities and fuels as part of the rental payment. The estimated costs of water and sewer, and fuels are reported on a 12-month basis but are converted to monthly figures for the tabulations.

would be the enrollment trends for Derl Mar and Morro Bay HS.

- i. Information infrastructure** – This Chapter should include an assessment of Morro Bay’s current information infrastructure and an analysis of any deficiencies that exist.

3. Are the priority issues identified at the end of each chapter the right issues on which to focus?

- a. Water supply and desalination** – The selection of “water supply and desalination” as a Priority Finding is somewhat confusing. The text of this finding states that “The City needs to identify sufficient water supplies to serve the community”, even though the CBA notes (on page 6-6) that “The City is expected to have an available supply in excess of projected demands through 2035”. Additional clarification is needed.

It seems peculiar that the additional City wells mentioned on page 6-8 are not included in the list of options.

If this item is retained as a Priority Finding, the range of available options should be expanded to include:

- Accelerated water line replacement to reduce leakage, and
- Upgrade of the City’s system of storm drains to provide for rain water capture and storage.

- b. Undergrounding of utility lines** – The negative visual impacts and relatively lower reliability of above-ground utilities should be a Priority Finding.
- c. Information infrastructure** – If the needed analysis indicates that upgrades to the City’s information infrastructure are required to maintain economic competitiveness, this would be a Priority Finding.

4. More generally, is there anything you would change?

- a. New port infrastructure and Use of the PG&E switchyard in relation to the decommissioned Dynegy facility** – The typeface for these two sections appears to be incorrect.
- b. Use of the PG&E switchyard in relation to the decommissioned Dynegy facility** – Redevelopment of the Dynegy site would be more appropriately analyzed in Chapter 7, as all options (not only those which relate to infrastructure) should be considered for this site.

Chapter 7: Land Use, Community Form, and Coastal Uses

1. Are there any inaccuracies?

- a. Scenic vistas and views, page 7-28 and figure 7.8** – There are many more scenic vistas than depicted in Figure 7.8 (e.g., from Bayshore Park, from the top of the stairway leading to the Front Street parking lot, from the bike path adjacent to S. Main Street). A third method for identifying scenic views could be a combination of the two methods listed...“any view that is identified on Figure 7.8 or which meets the following criteria...” Any figure depicting scenic vistas will, because of scale, be somewhat imprecise and should, therefore, be accompanied by a table that verbally describes the view site and the vista to be protected. The terms “fair view”, “good view”, and “excellent view” need to be defined.
- b. Community and visual character, page 7-34** – The wording of this section seems to imply that density, building height, lot size, and the year in which structures were built are the primary determinants of neighborhood character. In fact, the City has, through its adopted Neighborhood Compatibility Guidelines and through multiple public discussions at both the Planning Commission and City Council levels, defined neighborhood character much more broadly. The CBA should make clear that the concept of neighborhood character, especially as applied to residential neighborhoods, includes:
 - The bulk, scale, lot coverage, and apparent size of structures (as opposed to merely the height)
 - Architectural design that is original and creative, but compatible with existing development and which avoids a “tract house” appearance

- Site design that integrates with the neighborhood (e.g., front entrances that are visible from the street; minimization of street-facing garages and driveways; absence of high walls, fences, or gates in front yard areas)
 - Sensitivity to adjacent properties with respect to height and structure placement
 - Use of natural building materials such as wood, stone, steel, copper, and glass
 - Landscaping compatible with adjoining properties, with particular emphasis on the preservation of mature trees.
- c. Short-term rentals, page 7-17** – It could be argued, however, that a 2-bedroom short-term rental is equivalent to two motel rooms, a 3-bedroom short-term rental is equivalent to three motel rooms, and so on. From this point of view, the majority of short-term rentals would fit the State’s criterion for “affordable”.

2. Is anything missing?

- a. Overnight visitor-serving accommodations in Morro Bay, , page 7-10** – For the sake of perspective, it would be useful to know the proportion of overnight accommodations in surrounding beach communities (Avila Beach, Pismo Beach, Los Osos, Cayucos, and Cambria) which meet the criterion for “low-cost”.
- b. Commercial fishing infrastructure, page 7-19** – Part of the GPAC discussion with regard to commercial fishing infrastructure will, undoubtedly involve the interpretation and enforcement of Measure D. The CBA should, therefore, include a current inventory of existing land and water uses that are not compliant with Measure D.
- c. Scenic and visual resources, page 7-27 through 7-33** – This section appears to consider only public views and provides no discussion of the much more complex issue of private view protection.
- d. Light and glare, page 7-33** – It should be noted that, in Morro Bay, multiple areas of high terrain will render nighttime illumination visible from greater distances than would be the case in flatter terrain and, thereby, increase the negative visual impacts of such lighting.
- e. Baseline assessment of community character areas, pages 7-39 through 7-46** – These sections of the CBA are absolutely central to the development of an updated GP/LCP and Zoning Ordinance, yet they are restricted to only eight pages which contain primarily descriptive text, with little actual assessment. In order to effectively inform the GPAC process, the evaluation of each of these areas should be expanded to include the following sub-sections:

For residential portions of each community character area:

- Determinants of community character in residential portions of the area, to include:
 - Bulk, scale, lot coverage, and apparent size of existing structures
 - Typical architectural design in the community character
 - Existing integration of site design with the neighborhood
 - Relationship of adjacent properties to one another with respect to height and structure placement
 - Building materials of existing residences
 - Landscaping, with particular emphasis on streetscape and mature trees.
- Identification of current conditions (social, economic, or regulatory) which discourage new residential development from retaining consistency with existing community character
- Identification of current issues relating to residential development which are not adequately addressed by the City’s present GP/LCP and Zoning Ordinance
- Analysis of provisions of the current GP/LCP or Zoning Ordinance which appear infeasible or inappropriate when viewed in the light of current residential development patterns

For commercial zones within each community character area:

- Analysis of existing commercial development patterns and comparison to the development patterns envisioned by the current GP/LCP and Zoning Ordinance
- Evaluation of the degree to which commercial portions of the community character area have achieved economic success under the provisions of the current GP/LCP and Zoning Ordinance
- Comparison of commercial development patterns as envisioned by the current GP/LCP and Zoning Ordinance with alternative concepts that could provide for greater economic viability and greater benefit to surrounding residential neighborhoods and/or to the City as a whole

- f. Baseline assessment of community character areas, pages 7-39 through 7-46** – It is my impression, based on observation and discussions with City staff, that smaller and older housing units are being demolished and replaced with much larger “spec” homes on a regular basis. If this phenomenon can be documented it should definitely be included in the CBA, as it affects not only neighborhood character, but housing affordability, as well.
- g. Inconsistencies between existing General Plan and Zoning Ordinance and actual development patterns** – In a number of areas, development has evolved in a manner which appears to be inconsistent with the vision expressed by our current General Plan and Zoning Ordinance. The CBA should identify such areas of incongruity and analyze the factors responsible in each area. An example of such inconsistency might be, for example, “residential development along portions of North Main Street where the primary zoning is commercial”. Factors involved might include commercial zoning of a land area that exceeds demand, limitation of local egress from Highway 1, greater or more rapid financial return from residential projects than from commercial, and/or establishment by the City of widespread “R” overlay zoning. This is merely an example, but is illustrative of the type of analysis that is needed.

3. Are the priority issues identified at the end of each chapter the right issues on which to focus?

- a. Age and condition of buildings** – Suggest adding a statement to the effect that “Since the preservation of existing buildings, especially in residential areas, contributes to maintaining neighborhood character, the City may wish to consider measures which encourage the maintenance and refurbishment of existing residences over demolition and replacement.”
- b. Neighborhood compatibility** – This Priority Finding actually seems to combine two distinct concepts. For the sake of clarity, I would suggest separating them along the following lines:

“Neighborhood character - The current General Plan endorses preservation of neighborhood character, but lacks specificity as to what criteria are to be utilized or how such criteria might be applied to achieve this goal. Additionally, community desires about housing size and type and the kinds of development which are appropriate in the various community character areas may have changed since adoption of the current plan. Gathering, reviewing, and incorporating input about neighborhood and community character will ensure that the updated plans and regulations reflect the vision that the residents of Morro Bay have for the future living environment of the City.

Outdated zoning - In some areas of the City, land use patterns have evolved in a manner that appears to be at odds with those envisioned by the current General Plan and Zoning Ordinance. In these areas, special care will be needed to ensure that the updated GP/LCP is consistent with current physical, social, and economic realities and is consistent with the community’s vision in a manner that will avoid inconsistency in the future.”

- c. Embarcadero-downtown connection** – I am able to find no data or discussion within Chapter 7 that provide the requisite factual basis for this finding. Since findings are required to be based upon and derived directly from factual evidence, it is difficult to see how this “finding” can be considered valid.
- d. Views** – The second sentence of this finding seems to indicate that the level of view protection afforded by the current General Plan and LCP are adequate. This is not, in my opinion, the case. Would suggest: “An expanded program to identify, protect and enhance public view sites is important to preserving Morro Bay’s natural beauty and engagement with the community on the preservation of private views could potentially contribute to preservation of community character.”

- e. **Commercial fishing and low-cost visitor-serving accommodations** – These findings should be relocated (see comment 4a., below).
- f. **Growth management** – This finding is troublesome from a number of perspectives. As in the case of c. (above) it is presented in the absence of any substantial discussion of factual basis. Chapter 7 presents no information as to potential changes in land use designations that would provide for “additional development potential”. In addition, this “finding” proposes a future action (i.e., reconsideration of the population limit imposed by Proposition F), in direct contradiction to the stated purpose of the Community Baseline Assessment (“The CBA does not, however, provide recommendations, goals, policies, or actions.”, Chapter 1, page 2). Finally, this finding implies that the GPAC would endorse GP/LCP provisions that are demonstrably inconsistent with the wishes of Morro Bay residents, as expressed at the ballot box.

4. **More generally, is there anything you would change?**

- a. **Chapter contents** – The portions of this Chapter which deal with tourism, commercial fishing, recreational boating, industrial uses, agricultural resources, aquaculture, and energy-related uses seem to be highly focused on economics. These sections do not fit well with the sections on community character. I would break the current Chapter 7 into two separate chapters or move the above-mentioned sections to Chapter 5.0 (Economic Conditions and Market Trends).
- b. **Neighborhood character** – Given the high priority expressed by Morro Bay residents interest in preserving the City’s “small town character”, this topic needs to have much greater representation in the CBA. Seven pages is insufficient to thoroughly analyze the varied commercial and residential environments which exist within the City. In contrast to the exhaustive discussion and minute dissection of economic issues, the treatment of neighborhood character seems superficial and primarily merely descriptive. See also comment 2d., above.

Chapter 8: Natural and Environmental Hazards

1. **Are there any inaccuracies?**

- a. **Seismic and geologic hazards** – Generally, this section is very well written and pertinent. In the discussion of potential earthquake hazards (page 8-11), however, it is not entirely clear whether the described risks are only for earthquakes associated with seismic activity or also apply to the potential for earthquakes occurring spontaneously or related to water saturation.

2. **Is anything missing?**

- a. **Seismic and geologic hazards** – Many of Morro Bay’s residences and commercial buildings were constructed prior to current codes for earthquake resistance. Some consideration of this vulnerability would seem warranted.
- b. **Current wildfire risk, page 8-15** – It should be noted that, while wildfire risk in most of the open land surrounding Morro Bay is moderate, the risk of property damage in the event of fire is increased by the proximity of development to potential fire areas and by the lack of any fire-resistant buffer zone.
- c. **Historic drought events, page 8-21** – The relationship between climate change, the potential frequency and severity of future drought events, and the prolonged current drought should be analyzed.
- d. **Existing hazardous material conditions, pages 8-27 through 8-33** – The current MTBE contamination near the intersection of North Main Street and Highway 41 is not discussed.
- e. **Morro Bay local hazard mitigation program, page 8-40** – The LHMP requires annual reports on the implementation of the plan. The current status of implementation should be documented here.
- f. **Morro Bay multi-hazard emergency response plan, page 8-40** – The current status of implementation should be documented here.

3. Are the priority issues identified at the end of each chapter the right issues on which to focus?

- a. **Wildfire** – Since the likelihood of wildfire is far greater than any of the other hazards discussed here, the need for a review to ensure that current mitigation measures are optimal should be a Priority Finding.
- b. **Climate change vulnerability** – To avoid redundancy and the potential for contradictory statements, this material should be moved to the Chapter on greenhouse gas emissions.

4. More generally, is there anything you would change?

- a. **Form of Priority Findings** – The Priority Findings should be succinct statements that clearly define important existing conditions that need to be addressed in updating the GP/LCP. The lengthy discussion of potential earthquake damage, for example, should be moved to the section on projected seismic and geologic hazard risk (page 8-32) The Priority Finding, in this example, should be condensed along the following lines:

“Many commercial and residential structures in Morro Bay are not constructed in a manner which would allow them to withstand foreseeable seismic events.”

Chapter 9: Natural Resources

1. Are there any inaccuracies?

- a. **Description of “urban” habitat** – The description of the “urban” areas of Morro Bay as being “completely man-made with plant species that “are typically ornamental and other nonnative invasive plant species” is inaccurate. In fact, large portions of the residential community here feature eucalyptus, pine, oak, and other high-value habitat trees, and are intimately associated and interconnected with undeveloped habitats. As a consequence, such areas support populations of wild turkeys, hawks, owls, dove, and quail, as well as deer, fox, coyotes, raccoons, and opossum. The close connection of many of Morro Bay’s “urban” areas to nature is a significant aspect of those neighborhoods’ character.

2. Is anything missing?

- a. **Vegetation communities and habitats, pages 9-1 through 9-9** – These comments appear to be speaking about the various woodland types, shrub-dominated habitats, herbaceous-dominated habitats, and sparsely-vegetated habitats in only very general terms. What is missing is any baseline assessment or observations about the actual nature or condition of habitats in Morro Bay, specifically. This is problematic as, in the absence of an actual baseline assessment, there is no data to allow evaluation of the effects of GP/LCP policies on these habitats.

Major factors currently impacting habitat, such as drought, pine-pitch canker, and myoporium thrip are not even mentioned.

- b. **Wetlands and water features, pages 9-11 through 9-15** – As with a., above, these pages give only “text-book” descriptions of habitats found in Morro Bay, with no actual on-the-ground baseline assessment.
- c. **Marine resources, page 9-16** – The CBA devotes only one paragraph to marine resources, and even this short treatment is oriented toward the economic value of the bay, rather than to its value as a natural resource. Such important issues as silt deposition, elevated nitrate levels, reduced levels of dissolved oxygen, and loss of critical eelgrass habitat are not addressed.
- d. **Evaluation of the apparent lack of consistency between the policies of Morro Bay’s current LCP and the mapped areas of environmentally sensitive habitat (ESHA)** – The U. S, Fish and Wildlife Service defines the term *critical habitat* as “a specific geographic area(s) that contains features essential for the conservation of a threatened or endangered species”. The Morro Bay Local Coastal Plan (page 186), furthermore, states that one of the criteria used in determining which areas warrant special protection under the Coastal Act as environmentally sensitive habitats is “specialized wildlife habitats

which are vital to species survival". Under these definitions, it would seem clear that all critical habitat areas should be designated as ESHA under the LCP.

In comparing LCP Figure 28 (page 185) with CBA Figure 9.3 (page 9.17), it is apparent that substantial portions of the critical habitat for the California red-legged frog and for the Western snowy plover have not been designated as ESHA by the City. This inconsistency should be discussed as part of the Community Baseline Assessment.

Additionally, the California Coastal Act and Morro Bay LCP list "unique, rare or fragile communities which should be preserved to ensure their survival in the future". It is unclear how this should be applied to the occurrence of rare plant species (e.g., California seablight) and birds (e.g., California black rail), in Morro Bay, as shown in CBA Figure 9.3. Again, this issue should be considered as part of the CBA.

3. Are the priority issues identified at the end of each chapter the right issues on which to focus?

a. The lack of consistency between designated ESHA and the textual requirements of the CCC and LCP should be a major Priority Finding..

b. Climate change vulnerability – To avoid redundancy and the potential for contradictory statements, this material should be moved to the Chapter on greenhouse gas emissions.

4. More generally, is there anything you would change?

No.

Chapter 10: Noise

1. Are there any inaccuracies?

None identified.

2. Is anything missing?

a. City of Morro Bay General Plan Noise Element, pages 10-14 through 10-17 – Several technical shortcomings in the City's current Noise Element should be noted:

- Although Ldn and CNEL are similar, they are not identical. In particular, these methodologies differ in the way in which nighttime noise is accounted. The Noise Element, therefore, should not specify "Ldn/CNEL", but should specify one or the other. CNEL seems to be gradually replacing Ldn, and would probably be the better choice.
- The existing Noise Element does not specify A-weighting of noise measurements. A-weighting is most appropriate in most instances in which the effect of noise on humans is of concern. The term "dB", therefore should be universally replaced with "dB(A)".
- In CBA Table 10.6 (Noise Element Table N-5), the terms "Maximum Level, dB" and "Maximum Level, dB – Impulsive Noise" are somewhat imprecise. These should be supplemented by adding the accepted measurement designations, as follows: "Maximum Level (LAFmax, dB(A))" and "Maximum Level, Impulsive Noise (LASmax), dB(A)"

b. City of Morro Bay General Plan Noise Element, pages 10-14 through 10-17 – The technical issues noted above with respect to the General Plan Noise Element apply to Municipal Code Section 17.52.030, as well.

3. Are the priority issues identified at the end of each chapter the right issues on which to focus?

Yes.

4. More generally, is there anything you would change?

No.

Chapter 11: Parks, Recreation, and Open Space

1. Are there any inaccuracies?

None identified.

2. Is anything missing?

- a. **Community-based parks, pages 11-6 and 1-7** – The community-based park located west of Morro Avenue between South and Olive Streets does not appear in Table 11.5 or in Figure 11.1.
- b. **Resource-based parks and open space, page 11-8** – The consideration of open space should include not only properties within the City limits, but also should address the status of adjacent land and the potential for establishing a “green belt” around the City.
- c. **Current park service levels, page 11-10** – This section states that n”Morro Bay owns and operates approximately 300 acres of accessible open space and parkland”, yet the total acreage of community-based and resource-based parks listed in Tables 11.5 and 11.6 is only 54 acres (i.e., 5.1 acres per 1000 residents). While this figure still exceeds the standard set in the Quimby Act, the discrepancy needs explanation.

It is notable, with regard to this discussion that the actual text of the Quimby Act indicates that:

“The park area per 1,000 members of the population of the city, county, or local public agency shall be derived from the ratio that the amount of neighborhood and community park acreage bears to the total population of the city, county, or local public agency as shown in the most recent available federal census. The amount of neighborhood and community park acreage shall be the actual acreage of existing neighborhood and community parks of the city, county, or local public agency as shown on its records, plans, recreational element, maps, or reports as of the date of the most recent available federal census.”

This language does not suggest that land which is merely zoned for conservation/open space or for agriculture should be considered as “parks”.

3. Are the priority issues identified at the end of each chapter the right issues on which to focus?

Yes.

4. More generally, is there anything you would change?

- a. **Encroachments on public access, page 11-16** – In order to present a more complete description of the “prescriptive right of access” issue on Toro Lane, I would suggest adding the following prior to the last sentence in this section:

“Analysis by the City, however, concluded that numerous equivalent and superior coastal access routes are available to the public in the immediate vicinity and that pursuit of a prescriptive easement at this site would likely be precluded by the “takings” clauses of the California and U. S. constitutions. The California Coastal Commission, in reviewing the proposed project, subsequently declined to pursue a prescriptive easement at this site.”

5. Did you learn anything new or surprising?

Yes.

Yes.

Chapter 12: Shoreline Management and Protection

No comments at this time.

Chapter 13: Transportation and Mobility

1. Are there any inaccuracies?

- a. **Roadway classifications, pages 13-1 through 13-2** – The text on page 13-1 states that “the segment of Highway 1 in Morro Bay between South Bay Boulevard and Atascadero Road operates as a freeway”, whereas Figure 13-1 identifies this road segment as “other principal arterial”. Likewise, text indicates that “the segment of Highway 1 from Yerba Buena north to the city limits operates as an expressway”, while Figure 13-1 shows this as “minor arterial”. The classification of Highway 1 between Atascadero Road and Yerba Buena Street is unclear.

2. Is anything missing?

- a. **Roadway classifications, page 13-2** – The classifications “principal arterial”, “minor arterial”, “major collector”, and “minor collector” are not defined, even though the terms “minor arterial” and “major collector” are used later in this section.
- b. **Roadway classification, pages 13-1 through 13-4** – The CBA should provide an analysis of the whether or not each of the City’s arterial and collector streets are in compliance with Federal Highway Administration guidance with respect to design (lane width, shoulder width, length), spacing, location (neighborhood penetration) and access. See http://www.fhwa.dot.gov/planning/processes/statewide/related/highway_functional_classifications/section03.cfm.
- c. **Roadway condition** – The CBA should include information as to the current condition of the community’s streets, as well as indicators of how condition has changed over time.
- d. **Automobile intersection operations, pages 13-5 and 13-6** – The CBA should note and discuss the adverse effect of the excessive and unwarranted number of stop signs on Morro Bay Boulevard between Piney Way and Main Street.
- e. **Goods movement, page 13-9** – The CBA does not note that vehicles making deliveries in the downtown and Embarcadero areas often simply double-park in traffic lanes.
- f. **Parking, pages 13-14 through 13-19** – The CBA discusses only parking in the downtown and coastal access areas. The fact that some residential neighborhoods in Morro Bay (particularly in North Morro Bay and some areas adjacent to downtown) face major parking issues should also be discussed and analyzed.
- g. **Coastal zone access and parking, page 13-16** – The fact that parking demand at the North Point Natural Area and at Morro Strand routinely far exceeds the number of spaces should be discussed. In addition, the negative impact of the “no parking” restrictions along Toro Lane should be noted.
- h. **Walking, page 13-19** – The CBA states that “Section 12.04.010 of the Municipal Code requires that new developments conform to the City’s Standard Drawings and Specifications (City of Morro Bay 1987), which require sidewalks for commercial, industrial, and high-density residential uses as well as on arterial, local, and collector roads. Hillside streets in R1/R2 zoning are required to provide a flat walkable surface on one side of the road.”

This statement, first of all, is very difficult to understand. If sidewalks are required on arterial, local, and collector roads, wouldn’t this mean that they are required everywhere? What other road types are left?

Second, this paragraph does not really provide an assessment of the baseline condition in Morro Bay, but merely quotes code. The necessary information would include:
 - What percentage of “arterial, local, and collector roads” in the City lack sidewalks and where are such roads located?
 - What percentage of “hillside streets in R1/R2 zoning” in the City lack a flat walkable surface outside of traffic lanes and where are such streets located?
- i. **Schools, page 13-20 and 13-21** – The “recent pedestrian and bicycle improvements to the Highway 1 Southbound Ramps/Atascadero Road intersection” should be described, as should the way in which the “conditions for student cyclists and pedestrians” have improved.

- j. Transit, page 13-27 through 13-29** – Ridership data and trends should be provided for RTA Routes 12 and 15, for Morro Bay Transit, and for the Morro Bay Trolley. This section should also discuss the implementation of recommendations made in the San Luis Obispo Council of Governments Morro Bay Transit TDA Triennial Performance (May, 2013).

3. Are the priority issues identified at the end of each chapter the right issues on which to focus?

- a. Excessive motor vehicle speeds** – The roadways identified in Table 13.3 as exhibiting excessive vehicle speeds are all classified as “major collectors” and, in the case of the two streets with the highest speeds (Kern Avenue and Piney Way) experience average daily traffic volumes appropriate to that classification. The design of these streets, however, is not consistent with Federal Highway Administration specifications in several respects:

- Entry to these major collectors by private driveways is frequent
- Curbs are not present in some locations
- Lane widths may not meet the standard 10-12 feet in some areas

It should also be noted that the prima facie speed limit of 25 mph in residential districts does not restrict the authority of local governments to set higher speed limits on properly designed major collectors. Section 22357.(a) of the California Motor Vehicle Code provides that:

“Whenever a local authority determines upon the basis of an engineering and traffic study that a speed greater than 25 miles per hour would facilitate the orderly movement of vehicular traffic and would be reasonable and safe upon any street other than a state highway otherwise subject to a prima facie speed limit of 25 miles per hour, the local authority may by ordinance determine and declare a prima facie speed limit of 30, 35, 40, 45, 50, or 60 miles per hour, or a maximum speed limit of 65 miles per hour, whichever is most appropriate to facilitate the orderly movement of traffic and is reasonable and safe.”

This Priority Finding would more properly be reworded as:

“The design and configuration of many major collector streets in Morro Bay are not consistent with Federal Highway Administration guidelines, with the result that posted speed limits are insufficient to facilitate the orderly flow of traffic from and through residential neighborhoods.”

- b. Adequate parking** – The manner in which the study blocks of the 2007 Parking Management Study were configured in the downtown area is inconsistent with the actual parking patterns of motorists. Consequently, whether inadvertently or by intent, this study greatly overestimates the adequacy of parking spaces in the downtown, and does not provide a credible basis for determining that “parking supply is generally adequate”.

4. More generally, is there anything you would change?

No.

Chapter 14: Water and Water Quality

1. Are there any inaccuracies?

None identified.

2. Is anything missing?

- a. Groundwater, page 14-12 and 14-13** – Table 14.1 should include actual State standards for each of the listed substances.

- b. Discussion of increasing water rates and potential impacts on residents**

c. Discussion of water conservation efforts and opportunities

3. Are the priority issues identified at the end of each chapter the right issues on which to focus?

a. Seawater intrusion of groundwater wells – This priority finding is not supported by the text of the section.

4. More generally, is there anything you would change?

The information on biologic impacts of changes in water quality on the estuary and bay should be moved to the chapter on Natural Resources.