

November 30, 2015

San Luis Obispo County Planning Commission
County Government Center
San Luis Obispo, CA. 93408

RE: SUB2013-00052 CO14-0020 Billig

Subdivide a 4.89 acre parcel into 3.43 and 1.46 acre parcels at 1155 Las Tablas Road, Templeton, Calif. and a conditional use permit for the construction of a Psychiatric/ Behavioral Health hospital, and a separate Memory Care assisted living facility on each parcel, respectively.

Honorable Planning Commission:

The Templeton Area Advisory Group (TAAG) convened several meetings from August to November 2014, to address the proposed Psychiatric Hospital and Memory Care facilities. We heard from hundreds of concerned Templeton citizens, including many professionals in the medical fields. We have discussed this facility with members of Law Enforcement, Fire Departments, and Mental Health Professionals, other Mental Health facility operators, and San Luis Obispo County mental health employees. We have looked at this project from many angles and aspects and came to the following recommendation, and have outlined our concerns below:

Recommendation: *TAAG voted 7-0 to not support this project at this location.* We recommend the Planning Commission DENY the CUP for the many reasons why this is not the proper or needed facility in the proposed size, location and service level. Our concerns are detailed below:

Community Vision: TAAG has heard and analyzed community concerns about this project. We as a community recognize the need for additional levels of mental health services throughout the county. We have embraced more properly sized and focused facilities in the past, and new proposals that have recently been pre-referral reviewed. Templeton strongly believes that a more focused, properly sized facility with significantly more land, servicing seniors only, would be a better fit for the community, the mental health support services in Templeton, and the existing level of medical support in the community.

The Medical Community in Templeton came out in large numbers with a unified voice: This is not the type, size or location of a proper Mental Health facility for the County. Their reasons were many, but a few salient points were: Not designed with evidence based medical data (no professional survey or data was collected); the Community lacks social support services to support the hospital; the site is woefully inadequate to support a proper treatment program; the facility will not be supported by the infrastructure and supporting services of Templeton; the facilities will over-whelm the already existing shortage of medical professionals that Twin Cities Hospital and the North County suffer from today.

In reviewing similar service facilities located elsewhere in California, this facility is grossly negligent in land area size and design. Mental health treatment and Memory Care treatment both prescribe to large secure outdoor areas with landscaped grounds. Professionals at every level, and every other facility steadfastly stated this was a significant requirement for proper treatment. Neither of these facilities provides adequate grounds, and the Psychiatric hospital offers none.

This over-sized “catch-all” facility is NOT properly designed to serve the mental health needs of the entire county, is NOT properly placed, nor will it remain at a level of service proposed by the developer, as economics will dictate significant change to attain profitability, at the expense of the mentally ill, their families, and the Templeton community.

County demographics: The scope of this facility does not match the demographics or needs of the community or county. San Luis Obispo’s Youth population (those under 18 years of age) is 18.3% (2010 census data), yet this hospital will have 50% of 91 beds for Youth. SLO County mental health personnel estimate the County needs an additional 3 youth beds, not the 48 proposed. With the newly awarded Crisis Stabilization Unit grant funding, the establishment of that unit will

greatly lower the already sub-capacity load on the current PHF Unit, thus freeing up the additional County needed beds for local referrals.

This proposed project will immediately cause significant relocation of Youth patients from outside the area. Besides not having out-patient services for these children, Templeton does not have family services for housing the families who will come with these relocations. Templeton lacks a hotel or other housing options, and no out-patient services for complete families. Furthermore, the economic impact to the small Templeton Unified School District will be significant and negative.

The Senior (over 65 years of age) demographic is 16.9% of the population. A much smaller co-services facility serving Memory Care and the Mental health needs of Seniors, would be appropriate in this area, as previously approved.

The largest demographic is the county's adult population at 64.8%, a number that this facility may more deeply serve, but a group that the community has no out-patient services to support. This population also would make up a majority of the Involuntary Psych holds, a population better served in a larger city with a full complement of services to meet their needs.

Drainage and topography concerns: This project needs to conform to the Templeton Community Design Plan. The developers need to design the project to fit the terrain of the original property which is a gentle slope from Las Tables southerly to the housing project being developed to the south. This would be in conformance with the neighboring projects to the east and west of the property. The current plan uses extensive retaining walls which TAAG has serious concerns over considering the applicant's plans to build retention/detention structures in riparian habitat, and the high water table in this area.

TAAG has serious concerns on: The nature of the lower property being used for flood control; the lack of engineering solutions to determine if proposed wall foundations will be imbedded in structurally sound bedrock; the high water levels of the 1995 March floods which, with the proposed retaining walls, will flood the low-lying houses to the west and south; the building of such structures and the buildings they will support in seismically unstable soils. We are also concerned that the retaining walls will further channelize Toad Creek increasing the speed and flow causing flooding in downstream Templeton and specifically at the Main Street culverts.

The upstream Templeton-Bethel Park flood basin is dangerously over-subscribed to in terms of flood control, and this project will further exacerbate that dangerous condition. In addition, Bethel Park's flood basin has a direct drainage pipe into this property.

TAAG enters into the record this warning of recognized hazardous existing conditions and improper recognition of future damage potential by the Developer, Land-Owner, the County Planning Department, and Templeton Community Service District (all legally responsible for these issues).

This project also needs to conform to the Templeton Community Design Plan, the California Dept of Fish and Wildlife regulations, and the U.S. Dept of Fish and Wildlife, through the protection of the Toad Creek watershed (a recognized Blue-line stream and tributary to the Salinas River). In the recent Toad Creek Drainage Update performed by the Public Works Department of San Luis County (conducted by Paavo Ogren, and David Flynn) and the Templeton Area Advisory Group (TAAG) Toad Creek Ad Hoc Committee, this property was proposed as one of several designated water retention areas with a series of retention ponds to slow flow rates. This storm-water drainage and retention matter should be taken into consideration along with current law that requires that no project can create additional storm water load to Toad Creek storm volumes, and all additional drainage must be retained on the property.

Traffic: TAAG believes the Traffic studies used to define this project are grossly understated and do not address the increased regional and multi-region traffic traveling great distances to utilize this facility. Also the increased large truck traffic, the lack of existing queuing for delivery trucks, and the peak hour traffic congestion in an Emergency vehicle critical zone, considering the location of Twin Cities hospital, will severely impact traffic, traffic safety, and pedestrian safety in this corridor. The estimates of westerly traffic flow will push commercial traffic into residential streets with a high population of children. The small private road that will serve the large housing development south of this project

will not be large enough to serve all the houses, the Psychiatric Hospital, and the “land-locked” Memory Care facility of which there is no guarantee of it being built.

Furthermore, the County did not use the State law SB743 (Steinberg, 2013) required standard for Environmental Impact Analysis. For this referral, the County’s environmental review of transportation impacts focuses only on the delay that vehicles experience at intersections and on roadway segments. That delay is measured using a metric known as “level of severity,” or LOS. The Templeton interchange at 101 & Las Tablas Road is now designated a LOS II per the County’s new Resource Management System (RMS) Guidelines. Mitigation for increased delay and traffic load does not exist, nor does it address the increase auto use and emissions and greenhouse gases.

The Planning Department is claiming a Negative Declaration on Environmental Impacts, when in reality, given the Applicant’s statements that this facility will serve persons statewide. The new “Miles driven” standard, greenhouse gas production, and other new environmental requirements of CEQA have not been addressed. The over-sized and far-reaching targeted patient pool, and the Negative Declaration ruling, encourages excessive use of transportation from not only the County area, but as the applicant states, from a state-wide draw. Several more appropriately sized, and more regional facilities would reduce this need for extensive temporary relocation, and reduce greenhouse emissions, as SB743 requires.

Under SB 743, the focus of transportation analysis shifts from driver delay to reduction of greenhouse gas emissions, creation of multimodal networks and promotion of a mix of land uses. None of these required elements have been studied nor quantified. Therefore the CEQA required elements of the Transportation study have not been conducted, the Environmental review is incomplete and not minimal, and TAAG requests the Planning Commission require a full State-wide traffic miles driven assessment per State law (SB743) in a complete Environmental Impact Report.

Parking: The Memory Care facility has no parking space, NO emergency vehicle dedicated access space, and NO truck delivery space. This will require trucks to park in the middle of the drive zones of the closest parking area. This will create a major hazard to Emergency vehicle access, and a non-workable parking design, much worse than the County Planning Department’s failed design at the Trader Joe’s parking lot in west Templeton. Only this failure will do more than delay grocery shopping, it will cost lives when emergency vehicles and personnel can’t access the Memory Care facility.

Furthermore, the Hospital project delivery area is inaccessible to typical delivery trucks that serve this area. The Developer’s reassurance of small delivery vehicles is not accurate, nor controllable by that party. Much as the same failed promises at the Trader Joe’s complex.

Neither facility has public or visitor / guest parking of adequate numbers for family visits to the 50% youth population. Templeton does not need additional design failures.

Public Safety: After investigating the size and scope of this facility, TAAG members have contacted facility operators, State Mental Health professionals, and County officials from similar facilities around the state. We have also contacted law enforcement personnel here locally and in other counties that house this type of facility. From this group of professionals, TAAG has discovered that this large multi-age group facility is not properly designed, not properly weighted to the populations needs, and will not be economically viable as presented by the developer. The economic realities of this facility, as presented by these numerous professionals, will require this facility to house California Welfare and Institutions Code 5150 (3 day), 5250 (14-day), and 5270 (30 day) Psychiatric holds. These individuals will represent a high profit to the Hospital, with no out-patient services for these patients upon release into the community. The County of San Luis Obispo operated a facility such as this in a more appropriate location where out-patient services do exist. The County closed this facility for lack of economic viability.

Applicant states Templeton Fire Department Chief has reviewed and signed off on this project. This is a blatant untruth. First off, there is no current Fire Chief, secondly, the Interim Chief has seen no final plans on this project. Furthermore, the Fire Dept. does not have adequate equipment to deal with a building of this magnitude. There is also not adequate room to evacuate the rear land-locked facility, as 3 sides have no possible vehicle access, nor emergency escape routes, due to well above grade design.

Zoning: Twin Cities Hospital and the closed SLO County Mental Health Hospital are zoned Public Facility. Templeton believes this property is not properly zoned for a large Hospital. This multi-use property also once included the area to the south, now being developed as housing. The land in this application is zoned Office/Professional, yet less than 2 acres will be developed as such. The Planning Department has ignored the Communities vision of proper development, by allowing “Discretionary” development on this property. A right neither embraced by Templeton nor proper planning.

Economic impact: Templeton Unified School District is still studying the large negative fiscal impacts this facility, as proposed, will have on the school district and community. TAAG and the community do not support these legal obligations that have significant negative fiscal impacts to Templeton schools, without developer mitigation. A topic the developer specifically stated they will not contribute mitigating funds to cover, then later suggested they may assist, but offer no enforceable or bonded mitigation.

State law: State regulations require the Planning process, and therefore the Planning Commission MUST consider and address ALL of the following:

1. Community Impact and Compatibility in the community and surrounding neighborhoods.
2. Environmental Impact under CEQA guidelines, including SB743 (not followed)
3. Community Health and Public safety in that the project and its use will not be detrimental to the health, safety, or welfare of the general public, or detrimental or injurious to nearby properties and neighborhoods.
4. Use will not generate a volume of traffic beyond the safe capacity of all current roads providing access to the project.
5. A balance of all testimony.

Given these concerns, TAAG respectfully requests the Planning Commission to deny the Conditional Use Permit to the Applicant as this project is significantly improper on this site for many technical reasons.

Respectfully submitted,

David C. La Rue, Ph.D.
Chairman
Templeton Area Advisory Group

cc: Board of Supervisors
TUSD, TCSD
TAAG Board Members