

ATTACHMENT 6

Templeton Area Advisory Group
Templeton, CA 93465

March 3, 2015

San Luis Obispo County Planning Commission
County Government Center
San Luis Obispo, CA 93408
By email: rhedges@co.slo.ca.us

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, CA and a conditional use permit for the construction of a Psychiatric hospital and 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 the mental health community including mental health professionals, mental health facility operators, and San Luis Obispo County mental health employees. We have reviewed this project from many angles and considered all aspects of it before coming to our conclusion. Our recommendation and our concerns are outlined below.

Recommendation: *TAAG voted 7-0 to not support this project at this location.* We recommend the Planning Commission deny the conditional use permit. This is not the appropriate or needed facility in the proposed size, location and service level. Our concerns are detailed below:

Community Vision: TAAG heard and analyzed community concerns about this project. Templeton as a community recognizes 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 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 expressing 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: It was not designed with evidence based medical data (no professional survey or data were collected); the community lacks social 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 overwhelm 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 areas. Professionals at every level in every other facility

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steadfastly stated this was a significant requirement for proper treatment. Neither of these facilities provides adequate grounds, and the psychiatric hospital offers none.

This oversized "catch-all" facility is not properly designed to serve the mental health needs of the entire county and it is not properly placed. As well, it will not remain at the level of service proposed by the developer, as economics will dictate significant changes to attain profitability, all 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 County's youth population (18 years of age and under) is 18.3 percent (2010 census data), yet this hospital will have 50 percent of its 96 beds for youth. Using county mental health figures they would fill three to five youth beds, not the proposed 48. This will immediately cause significant relocation of youth patients from outside the area. In addition to lacking appropriate 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, as well as out-patient services for complete families. Furthermore, the economic impact to the small Templeton Unified School District will be significant and negative.

The senior demographic (65 years of age and over) is 16.9 percent 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.

The largest demographic is the county's adult population (19-64 years of age) at 64.8 percent. This facility may more deeply serve this demographic, but the community has no out-patient services to support. This population also would make up a majority of the involuntary psychiatric 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. TAAG has serious concerns over this considering the applicant's plans to build retention/detention structures in a riparian habitat, and the high water table in this area. As well, TAAG has noted these concerns: 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.

The upstream Templeton-Bethal Park flood basin is dangerously over-subscribed to in terms of flood control, and this project will further exacerbate that dangerous condition.

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). In addition to conforming to the Templeton Community Design Plan it must also conform to the California Department of Fish and Game regulations and the U.S. Dept of Fish and Game, through the protection of the Toad Creek watershed which is a recognized Blue-line stream and tributary to the

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Salinas River. In the recent Toad Creek Drainage update performed by Paavo Ogren and Dave Flynn of SLO County Public Works Department and the TAAG Toad Creek Study Ad Hoc Committee, this property was proposed and flagged as a designated water retention area. This storm water drainage and retention matter should be taken into consideration along with current law that requires no project create additional storm water, and all additional drainage 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 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. 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.

Parking: The memory care facility has no parking 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 in emergency vehicle access, and a non-workable parking design, much worse than the failed design at the Trader Joe's parking lot in west Templeton. Only this failure will do more than delay grocery shopping, it could potentially cost lives when emergency vehicles and personnel can't access the memory care facility.

Furthermore, the psychiatric hospital's 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. We should learn from previous mistakes rather than continue to implement failed designs.

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 these groups of professionals TAAG has discovered that this large multi-age group facility is not properly designed, not properly weighted of 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 psychiatric hospital, but will not have access to critical out-patient services upon their release into the community. San Luis Obispo County previously operated a facility such as this in another location where out-patient services do exist, yet still closed the facility for lack of economic viability.

Zoning: Twin Cities Hospital and the now closed San Luis Obispo 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 two acres will be developed as such. The Planning Department has ignored the community's vision of proper development, by allowing discretionary development on this property. A right neither embraced by Templeton nor proper planning.

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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. The developer has already specifically stated they will not contribute mitigating funds to cover.

State law: State regulations require the planning process, and therefore Planning Commission considers all of the following:

- Community impact
- Health and public safety
- Fit in the neighborhood
- A balance of all testimony

Given these various concerns outlined above, TAAG respectfully requests the Planning Commission to deny the conditional use permit to the applicant.

Respectfully submitted,

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

Enclosures: Public comment letters received by TAAG regarding this proposed facility

cc: San Luis Obispo County Board of Supervisors
Templeton Area Advisory Group Board Members
Templeton Community Services District
Templeton Unified School District