



Chapter 1.0 INTRODUCTION AND PRELIMINARY OVERVIEW



1.0 INTRODUCTION AND PRELIMINARY OVERVIEW

The Cambria Community Services District (“CCSD”) provides water, wastewater, fire protection, parks, transit and refuse disposal services for the coastal community of Cambria, which is located in northern San Luis Obispo County. During the late 1920s and early 1930s, much of the service area was subdivided into small lots of approximately 1,750 square-feet each, or roughly 25 feet in width and 70 feet in length. Many of these smaller lots were also laid out over a Monterey Pine forest, which has since been found to be one of the last three remaining native stands in California. The subdivisions that created the smaller lots are antiquated, which under current standards, would not be built upon. Due to physical limitations, such as size limitations and steep grades, many of the small lots remain in an undeveloped state.

The CCSD is responsible for the water services in the community. Determining growth and the development of infrastructure systems is difficult due to the limitations of water resources and the CCSD’s lack of land use controls, which is the authority of the County of San Luis Obispo. Examples of the land use decisions affecting the CCSD’s facilities planning efforts include County approvals for the construction of buildings over the lot lines. This creates difficulties for the CCSD to plan for future service needs in Cambria because the potential, even though slight, exists that the parcels could be developed into more dwelling units in the future.



In 1966 the County of San Luis Obispo enacted a lot consolidation ordinance that required a minimum of two small lots in order to be considered as a single building site. The consolidation ordinance had certain provisions that allowed some of the original smaller lots to be considered as a building site depending upon their ownership history. Unfortunately, the “consolidation” of lots is not the same as “merger” within the context of the State’s Subdivision Map Act. Past practices by the County of San Luis Obispo have allowed construction of homes over interior lot lines of “consolidated” lots that were never merged in accordance with the Subdivision Map Act. Therefore, many of the older interior lot lines still exist. This has made it difficult to accurately plan and project the needs in Cambria due to the potential, even though slight, that certain homes could be demolished with new replacement dwelling units built within the antiquated, underlying subdivision lot.

Due to concerns over new growth outpacing available resources, the County adopted a Growth Management Ordinance in 1990. An annual Resource Management System (RMS) summary report has subsequently been developed by County planning staff for purposes of administering the Growth Management Ordinance by tracking the availability of key resources in comparison with their demands. Each year the County Board of Supervisors reviews the RMS report and sets a maximum allowable growth rate for various areas.

In addition to the County’s RMS reporting system, past planning efforts included attempts to quantify the costs of infrastructure, property acquisitions, as well as traffic impacts for various growth scenarios. These efforts date back to the mid 1990’s. More recently, the CCSD completed detailed mapping during the early 2000’s using



geographic information system (GIS) modeling to estimate likely and unlikely building lots as part of its water master planning efforts. The CCSD also administers a water wait list in coordination with the allowable growth rate established by the County that determines the number of new connections allowed each year. The CCSD closed its current wait list in 1990 when the County adopted its Growth Management Ordinance. Today, approximately 665 single-family residential units remain on the CCSD's water wait list.

In 2001, the CCSD Board of Directors declared a Water Code Section 350 water emergency based upon inadequate supply and delivery problems. As part of their 2001 action, with exception of a few development projects that were in the pipeline of being processed at the time, no new water connections are allowed. Pursuant to the legal requirements of a Water Code 350 emergency declaration, the CCSD has actively pursued a solution to its water supply problems. The water delivery problems, which impact fire-fighting capabilities, were prioritized and are currently being addressed. As discussed in Chapter 2 of this report, the CCSD has developed an update to the Water Master Plan, which is to include an Environmental Impact Report (EIR) in order to comply with the California Environmental Quality Act (CEQA).

Developing a water supply solution can be costly, controversial and require significant environmental review. Adding to the complexity is Cambria's remote location and there being no sources of imported water to the area. In addition, the service area is within the Coastal Zone and therefore within the jurisdiction of the California Coastal Commission, a state agency with the primary purpose of protecting coastal resources. The potential impact on such resources combined with the antiquated subdivisions within the service area has led to recommendations from the Coastal Commission for further reducing buildout potential in Cambria. Therefore, a significant issue that is to be addressed in the EIR for the Water Master Plan is the potential for growth inducing impacts of any supplemental water supply and how to mitigate them. The mitigation of this impact creates difficulties for the CCSD because it does not have the authority to regulate land use. Nevertheless, the CCSD has embarked on measures to further reduce build-out potential based upon the desires of the CCSD Board of Directors and the California Coastal Commission's past recommendations for it to do so. Thus, in order to respond to the issue of growth inducement, the CCSD has commissioned this Buildout Reduction Plan.

The Buildout Reduction Program is intended to identify feasible mitigation to mitigate the potentially significant growth inducing impacts of the Water Master Plan. The EIR will identify the CCSD's legal authority to impose mitigation to potentially significant growth inducing impacts to:

1. Cap the maximum number of potential water service connections within the CCSD service area; and
2. Allocate the new water services in a manner to minimize the adverse growth inducing impacts.



In sum, the CCSD must adopt all feasible legally enforceable mitigation measures to mitigate potentially significant environmental impacts. In addition, other governmental agencies that have discretionary approvals for the Water Master Plan, within their authority, condition their approvals on the implementation of the mitigation measures identified in the EIR. This report includes the following chapters:

1. Introduction and Preliminary Overview: This chapter briefly introduces the reader to the purpose and need for a Buildout Reduction Program;
2. Water Master Plan. The purpose for Buildout Reduction is closely linked to the Water Master Plan Update and multiple buildout reduction scenarios considered in the task reports. This chapter summarizes the Water Master Plan efforts.
3. Policy and Regulatory Background. The concept of Buildout Reduction has been referenced in various policy documents. This chapter presents citations which further the understanding of the need for such a program;
4. Mapping and Data Analysis. The Buildout Reduction Program has utilized Geographic Information Systems (GIS) to assist in understanding buildout projections and the effects of various strategies.
5. Buildout Reduction Strategy/Toolbox. The subchapter presents the “toolbox” of strategies for Buildout Reduction in Cambria. The program includes five (5) focused area approaches which include the following:
 - I. Current CCSD Programs;
 - II. Voluntary Density Reduction;
 - III. Development Constraints/Attrition;
 - IV. Land Use Regulations; and
 - V. Property Acquisition.
6. Financial Factors. A preliminary outline is presented at this time and will be supplemented with a follow-up companion study.
7. Implementation. This chapter takes the details from Chapters 4 and 5 and synthesizes the concepts into a mitigation program for incorporation into the Water Master Plan EIR.

It is recommended that the CCSD proceed with the approaches referenced in Chapter 5. The Land Use Regulations provisions discussed in Chapter 5, Subsection IV, may be considered the most cost effective means of reducing the maximum buildout projections. Of great interest is the adoption of the Draft Cambria and San Simeon Acres Community Plans of the North Coast Area Plan (prepared by San Luis Obispo County), as presented in the May 2005 Public Review Draft, which would reduce buildout in Cambria from the current Area Plan estimate of 11,611 single-family housing units to 6,130. The CCSD’s goal of 4,650 residential connections, which was set forth by the CCSD Board of Directors in July 2003, can then be more readily achieved through existing programs along with further



implementation of Voluntary Density Reduction programming (Chapter 4, Section II). Although the emphasis for the buildout reduction strategy is on the “toolbox” approach, the Community Plan Update is a significant milestone for the overall success of the program.



Chapter 2.0 WATER MASTER PLAN



2.0 WATER MASTER PLAN

Due to limited resources and ongoing challenges in providing reliable water sources, the CCSD embarked on a phased approach towards updating its Water Master Plan. The CCSD has since commissioned several reports and related work efforts as part of its phased Water Master Plan approach. The following summarizes key water master planning studies and reports that the CCSD will be adopting in order to improve upon its water system:

- *Phase 1 – Land Use and Buildout Analyses.* The CCSD completed an extensive initial base mapping effort in order to obtain an accurate map of its service area. The base mapping effort consisted of completing an aerial survey, post-flight processing of the aerials to convert images into digital-orthogonally corrected images, and digitization of key map features into a geographic information system (GIS). After the GIS information was gathered, the CCSD developed a model to assess the likely and non-likely buildable vacant lots for use in a subsequent buildout reduction plan. The base map was also updated to indicate controversial versus non-controversial land use changes proposed in an earlier 2000 era North Coast Area Plan Update. In addition, and due to a lack of resolution in the general land use descriptions used by the County, (e.g., the “Recreation” category can include undeveloped State park land, hotels, and active community parks) more detailed land use subcategories were developed under Phase 1 and was expanded upon and used as part of this Buildout Reduction Program.
- *Phase 2 – Water Supply Availability Analysis.* The Phase 2 work of the Water Master Plan update is summarized in a report entitled “Baseline Water Supply Analysis,” December 8, 2000, prepared by Kennedy/Jenks Consultants. This work included an assessment of the CCSD’s existing water supply, an analysis of aquifer hydrology, the development of a water supply and demand model, and recommendations for water shortage emergency criteria. The supply and demand findings from this work effort have been subsequently used during completion of Phases 3 and 4 of the Water Master Plan.
- *Phase 3 – Potable and Recycled Water Distribution Analyses.* The Phase 3 work of the Water Master Plan was split into two reports: one on the potable water distribution system; and, the second on a proposed recycled water distribution system. The potable water distribution system analysis focused on system improvements to improve fire fighting capabilities that are described in a report entitled: “Final Task 3 Report: Potable Water Distribution System Analysis,” dated July 2004. This report analyzed fire flow criteria that were approximately 250 to 350 percent higher than the current system capacity due to concerns over multiple fires from the high fuel loads and close proximity of adjacent structures in Cambria. Report recommendations resulted in three levels of priorities based on the value of the improvements towards improving fire-fighting capabilities. The highest priority Level 1 recommendations have been incorporated into the CCSD’s Capital Improvement Program and are in various stages of completion.



The second Phase 3 report consisted of a recycled water distribution report that analyzed the reuse of highly treated wastewater effluent for landscape irrigation. Candidate sites for recycled water use include the elementary and middle schools, future park sites, and larger commercial landscaped areas.

- Phase 4 – Assessment of Long-Term Supply Alternatives. The Phase 4 Assessment on long-term supply alternatives reviewed various supply alternatives developed by the CCSD over a period of approximately 20 years. Two levels of screening were developed based on tangible and intangible factors. In addition, sizing recommendations considered four levels of unit demand for residential customers to provide current and future customers a level of relief from existing water shortage restrictions. The increases in residential demands considered were 10, 20, 30 and 50 percent above the existing consumption level of 0.161 acre-feet per residential connection identified in the Phase 2 report. The total estimated supply requirement also allowed for the existing Coastal Commission permit requirement of at least 20 percent of the CCSD's supply being available for commercial retail and recreational uses (i.e., visitor serving uses).

The Phase 4 report recommendations included increased conservation efforts to the existing CCSD conservation and retrofit programs, the use of recycled water for landscaping, and seawater desalination. Summary tables presented within the report allow some flexibility in determining the size of a desalination facility, based on desired buildout capacity, and increase in unit consumption above the current baseline consumption rate. For example, a buildout scenario limited to 4,650 existing and future dwelling units with a 50 percent increase in residential demand, requires a desalination system capacity of about 602 acre-feet during the dry season. These are the same conditions the CCSD Board of Directors directed staff to pursue during a July 24, 2003 meeting.

WATER MASTER PLAN SCENARIOS FOR BUILDOUT

An initial step in developing the approach for the Buildout Reduction Study was to review the findings and scenarios first summarized in the potable water distribution system analysis, Task 3 Water Master Plan report prepared by Kennedy-Jenks. The report presents rationale for several buildout scenarios in order to develop a Water Master Plan that is responsive and flexible towards addressing future needs of the community. This section summarizes the scenarios developed through the CCSD's initial GIS programming:

With a goal of developing reasonable planning and build-out information, the initial CCSD GIS-based development scenario model for the Water Master Plan analyzed residential lots with particular attention to the high-density single-family neighborhoods. This analysis focused on the following:

- Is the lot less than 3,500 square foot minimum?
- Is the lot located in an area with greater than 30 percent slope?



- For those lots lying within a steep area, how much of the lot may be available for a housing site (i.e., on a flatter area within the same lot)?
- Was the lot already on the CCSD waiting list?

In addition to the computer analysis, CCSD staff performed manual checks of the GIS analysis output based on review of maps, knowledge of past practices, and historical information maintained in CCSD files. Tasks performed manually included checking against CCSD's water wait-list and the spatial position of a lot in relationship to adjoining lots that are already built upon. For example, a single vacant lot located on a steep area between two existing residences may not be as likely to be built upon as two separately owned lots that could later be sold and merged to form one buildable lot. However, the potential for future construction still exists, particularly on lots with ocean views. Owners could also pursue variances with the County in order to receive permission to build. Therefore, the number of likely non-buildable lots is subject to a planning level order of accuracy and unknowns.

MULTIPLE DEVELOPMENT SCENARIOS USED IN ANALYSES

Because of the complexity of the small lot issue and incomplete nature of the North Coast Area Plan at the time, the Task 3 Water Master Plan potable water distribution analyses and Task 4, Long Supply Alternative report evaluated several growth scenarios. Analyzing the different growth scenarios assisted with identifying long-term supply needs. However, the majority of upsizing and new pipe recommendations for the potable water distribution system were driven by fire flow needs.

Each build-out scenario assumed the following basic criteria:

- The planning period will be 20 years.
- No more than 125 units per year can be developed (per earlier CCC, Coastal Development permit).
- No less than twenty percent of the system demand is to be applied towards commercial retail and recreational uses (i.e., visitor serving) (per earlier California Coastal Commission (CCC), Coastal Development permit).
- The maximum allowable growth rate per year cannot exceed 2.3 percent (per San Luis Obispo County growth ordinance).

In order to complete CCSD's Water Master Plan while the County's NCAP updating process has continued, the CCSD also developed a base land use map for water master planning purposes. This map was based on existing County zoning plus certain non-controversial land use changes recommended in a 2000 era NCAP. The non-controversial changes were based on discussions with County planning staff. Development of multiple build-out scenarios resulted from review of various County-planning documents, Coastal Commission reports, CCSD operating permits, as well



as the Water Master Plan GIS modeling efforts. Each of the build-out scenarios analyzed within the water master plan update is summarized in Table 1.

Table 1
Summary of Buildout Scenarios for the Water Master Plan*

| Scenario | Estimated Total Housing Units | Estimate Year | Basis/Rationale |
|----------|-------------------------------|---------------|---|
| 1 | 6,700 | 2029 | Total number of future dwelling units from GIS analysis. Includes acquisition of the E/W Ranch, non-controversial changes from the Draft 2000 NCAP, merged single-family lots, and no subsequent lot retirements. Also included is an additional 163 mixed-use residential units within commercial land use areas, and 387 future multi-family units. |
| 2 | 5,700 | 2020 | Scenario 1 less the retirement of approximately 1,000 "likely non-buildable" high-density vacant single-family residential parcels |
| 3 | 5,250 | 2016 | Maximum number of dwelling units permitted under a May 29, 1981 California Coastal Commission Coastal Development permit (CCC permit 428-10). |
| 4 | 4,650 | 2011 | Maximum number of dwelling units estimated by adding 3,812 existing units (estimated as of the end of 2002) plus 165 connections in process, plus 670 remaining CCSD wait-listed customers. This also approximates the number of dwelling units served by a proposed desalination project that was the subject of an August 2000 advisory ballot. |

*Source: CCSD Water Master Plan, Task 3 Report.



Scenario 1

Scenario 1 is based on CCSD's GIS-based analysis and assumed no future cooperative lot retirements. This scenario resulted in approximately 6,700 housing units and was based on: the non-controversial changes recommended by the Draft NCAPs; an analysis of individual lots to determine their merged status; assigning open space and recreational land use to the East/West Ranch area and adjacent parcels owned by the CCSD; and, developing estimates for future multiple family and mixed use residential units. As further consideration of land conservation efforts to date, the 6,700 total does not include approximately 210 parcels that have been permanently retired by the CCSD from future water service, nor the open space areas acquired by land conservancies.

Scenario 2

Scenario 2 assumed the same 6,700 total of Scenario 1 less the "likely non-buildable" lots from CCSD's earlier GIS-based analysis to total 5,700 housing units. "Likely non-buildable" is defined with the assumption that approximately 1,000 of the remaining 2,346 vacant small lot, single-family residential parcels will ultimately be retired from development. The GIS analysis found these parcels to be located in steep areas, non-conforming with respect to minimum sizes, and in less desirable locations. To further assess development potential, CCSD staff manually reviewed output of the earlier computer models. Key staff familiar with local practices of re-assigning water allocations and moving and dragging meters to various parcels



conducted this review. The number of “likely non-buildable” lots is a planning-level accuracy estimate that could change depending upon future Planning Commission decisions on future variance requests, as well as the success of any future cooperative lot retirement program.

Scenario 3

Scenario 3 is based on the California Coastal Commission Coastal Development permit (CCC permit 428-10) issued May 29, 1981 which sets a limitation on dwellings to 5,250 housing units. The 5,250 dwellings total also coincides with CCSD’s existing wastewater treatment plant capacity.

Scenario 4

Scenario 4 was also considered in light of an earlier August 2000 advisory ballot that was held on a proposed desalination project. The prior project would have been sized for approximately 4,650 residential connections, or enough to serve the existing residences and CCSD’s wait-list.

During the CCSD Board of Directors’ July 24, 2003 meeting, a motion by the Board confirmed Scenario 4 as the preferred choice of a maximum of 4,650 connections. This total was based on 3,812 existing connections as of the end of 2002, plus 165 connections that were in process at that time, plus 670 future connections from the CCSD wait list.



Chapter 3.0 POLICY AND REGULATORY BACKGROUND



3.0 POLICY AND REGULATORY BACKGROUND

This chapter references the Policy and Regulatory provisions that support the Buildout Reduction Program in Cambria. Policies and programs, which refer to reductions in buildout potential and/or have a consideration in estimating buildout are specifically cited. The section highlights four primary policy references which include; 1) the May 2005 Public Review Draft Cambria and San Simeon Acres Community Plans of the North Coast Area Plan and Draft EIR (i.e., 2005 Draft Cambria Community Plan); 2) the 2000 North Coast Area Plan; 3) the San Luis Obispo County Local Coastal Program; and 4) the Cambria Design Plan. Exhibit 3-1 illustrates the relationship of the California Coastal Commission, San Luis Obispo County and the CCSD to land use decisions in Cambria. The purpose of this section is to acknowledge policy provisions set forth by the land use authority (County and Coastal Commission) for Cambria, which further justifies the need for buildout reduction.

2005 DRAFT CAMBRIA COMMUNITY PLAN AND EIR UPDATE

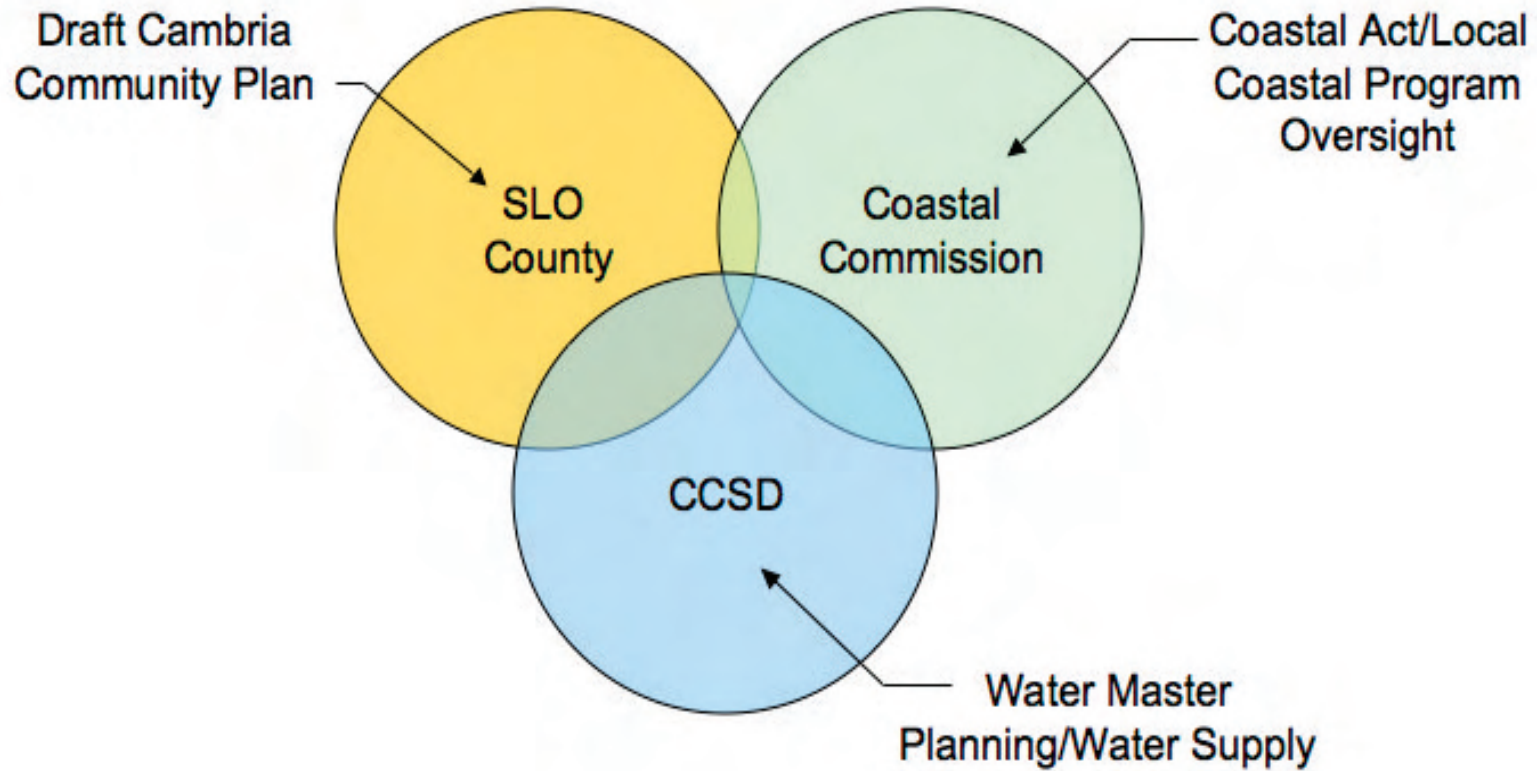
The County of San Luis Obispo is in the process of preparing the Cambria and San Simeon Acres Community Plans of the North Coast Community Plan Update, which is to guide development in Cambria and San Simeon Acres over the next twenty years. The public review draft was initially circulated for review in July 2004. In May 2005, the County developed a Public Hearing Draft, which is currently undergoing public review by the San Luis Obispo Planning Commission. The County will then proceed to complete the Updated Community Plan and EIR, which will continue through the County Board of Supervisors review and approval process.

With this latest planning document, the rural areas were essentially carved out and set aside. Therefore, no changes to the rural area standards, rural programs or rural combining designations are proposed as part of the update. The 2005 draft Cambria Community Plan replaces the former community General Plans and provides goals, objectives, policies, programs and standards unique to each area. The Community Plans Update describes County land use policies for a 20-year time frame.

2005 Draft Cambria Community Plan

Draft Community Plan goals for Cambria include provisions for encouraging voluntary transfer of potential development from antiquated subdivisions, agricultural lands, environmentally sensitive habitat areas and hazard lands to areas more appropriate for development. In addition, the goals encourage the establishment of a park or open space district to purchase small substandard lots in Cambria in order to reduce overall buildout and the corresponding need for costly new services and infrastructure. These general goals further support Cambria's Buildout Program.

Chapter 2, Population and Economy, provides goals and objectives for population housing and economy of the North Coast area. The chapter emphasizes growth management practices and projected growth rates. The chapter references approximately 4,000 dwelling units in Cambria in 2005, with approximately 7,900





potential additional units allowed by the existing 1988 Plan. A one percent annual growth rate is proposed to be codified in Chapter 7 of the Plan. At one percent growth per year, an additional 975 units would result under the 20-year term of the Plan. The Community Plan states that with this update, the ultimate buildout would be 6,130 and which is not estimated to occur until 2048. This is a substantial reduction when compared to the current County buildout projection of 11,611 and greatly improves the baseline in order to achieve the CCSD's buildout goal of 4,650.

The following provisions have been cited from the Land Use and Combining Designations chapters of the Community Plan:

- Transfer of Development Credits Program. The County, the CCSD, local nonprofit organizations, and the local Land Conservancy should promote expansion of the TDC Program to include more areas within the community of Cambria. Sensitive habitat areas should have the first priority for inclusion as sending sites for transferring development credits. Possible agencies that could participate include the Land Conservancy of San Luis Obispo County, Cambria Land Conservancy, Greenspace, Department of Fish and Game, U.S. Fish and Wildlife Service, Cambria Parks and Recreation Commission, and County Parks Division.

The Transfer of Development Credits Program has the objective of reducing potential buildout in the Special Project Areas for residential single-family development, by transferring the development potential of these areas to the remainder of Cambria small lot divisions. The County will continue to work with the Land Conservancy of San Luis Obispo County, or other program administrator approved by the County, to encourage voluntary transfer of development credits from Special Project Areas.

- Lot Consolidation and Retirement Program. A program should be initiated to encourage lot consolidation through voluntary mergers and other mechanisms, and to retire vacant lots through acquisition. An open space district should be formed through a cooperative effort between the County, the community of Cambria and others, to begin purchasing small and substandard lots. The objective of this CCSD would be to retire development rights, protect resources, preserve the forest, reduce the number of potential homes, improve fire clearance and reduce impacts on limited resources. Purchased lots could also be considered for a variety of purposes, such as pocket parks, viewsheds, habitat preservation and other uses to benefit the community.
- Small Lot – Open Space District. The County, CCSD, the community of Cambria, and other stakeholders should work together to establish an Open Space District to begin purchasing many of the small and substandard lots in Cambria. The objective of the District would be to preserve the forest from being physically displaced as small lots are developed with residential units. Secondary benefits would include lower building density, better fire clearance, more privacy between homes, larger yards, and more landscaping in neighborhoods.





Opportunity exists to begin a program to purchase some of the small substandard lots in Lodge Hill, Happy Hill, and Park Hill on an annual basis, and then commit them to open space. In conjunction with the Forest Management District, the lots could be used for a variety of purposes such as pocket parks, viewsheds, habitat preservation, and other uses beneficial to the community. The program would reduce crowding of buildings, traffic congestion, and demand for water and other services.

- Lot Consolidation for Monterey Pine Forest Protection. The County should review its procedures and, where necessary, suggest legislative changes to encourage lot consolidation within subdivisions that contain the substandard lots.
- New Residential Land Divisions. Projects creating new residential lots shall be required to permanently retire an equivalent legal building site located within the Cambria URL on a 1:1 basis. Proof of the required retirement shall be submitted prior to recordation of the final parcel or subdivision map. Retired lots shall have an open space or conservation easement recorded against the title of the property to prohibit development in perpetuity. Easements may be held by the County or the County may grant them to another public agency.

In addition, the Community Plan has included provisions for a Small Lot Reduction ballot measure, programming for County surplus lots, updates for Transfer of Development Credits and provides scheduling references for a Lot Consolidation/Retirement Program as a high priority.

2005 Draft Cambria Community Plan EIR

The Draft Environmental Impact Report (EIR) provides an assessment of the potential environmental consequences of implementation of the proposed Cambria and San Simeon Acres Community Plans of the North Coast Community Plan. The County of San Luis Obispo is preparing the Community Plans Update to guide new development in Cambria and San Simeon Acres over the next 20 years. The Community Plans Update addresses the areas within the Urban Reserve Line of Cambria and the Village Reserve Line of San Simeon Acres.

The Community Plans Update proposes future development for Cambria and San Simeon Acres that is consistent with the current pace, scale and character of development in the two communities. Principal concerns reflected by the proposed changes are the County's ability to reduce development potential to match resource availability regarding water supply, wastewater service, traffic capacity, streets and roads development/maintenance, school capacity, and housing as well as availability of services at an affordable cost and protection of the natural environment.

The Draft EIR analyzes alternatives to future development as outlined in the Community Plans Update. Four alternatives to the Plan that are analyzed are:



- *The Existing Plan Alternative.* Under this alternative Cambria and San Simeon Acres would develop in accordance with the currently adopted regulations of the 1988 North Coast Area Plan.
- *Increased Development Plan Alternative.* This alternative includes the same land use described in the Proposed Plan, but with no growth rates applied. Therefore, complete buildout is assumed to occur during the 20-year life of the Plan.
- *Decreased Development Plan Alternative.* This alternative would add a maximum of 650 additional dwelling units to the existing number of dwelling units in Cambria and would apply a one percent growth rate to dwelling units in San Simeon and to motel and commercial development in both Cambria and San Simeon. As shown in the table below, this alternative is consistent with the CCSD's objective for 4,650 single-family residential connections in Cambria.
- *No Growth Alternative.* This alternative supposes that no further development occurs in Cambria and San Simeon Acres beyond the existing condition.

**Table 2
Cambria Housing and Population Levels –
Existing, Proposed Plan and Proposed Alternatives**

| Type | Housing | Population |
|-----------------------|---------|-----------------|
| Existing Setting | 4,000 | 6,400 |
| Proposed Plan | 4,975 | 8,260 – 11,190 |
| Existing Plan | 11,925 | 19,790 – 26,830 |
| Proposed Plan | 4,975 | 8,260 – 11,190 |
| Increased Development | 6,130 | 10,180 – 13,790 |
| Decreased Development | 4,650 | 7,724 – 10,469 |
| No Growth | 4,000 | 6,645 – 9,000 |

Although the *No Growth Alternative* has the least amount of environmental consequences, the *Decreased Development Alternative* was found to equal the environmental effects to the Community Plan's Update.

The EIR includes a discussion of the Transfer of Development Credits Program in order to reduce environmental impacts, demand for public services and development potential. The EIR also references standards for new residential land divisions that have been either revised or added to the Plan, resulting in changes to allowed uses and development potential. Projects creating new residential lots shall be required to permanently retire an equivalent legal building site located within the Cambria URL on a 1:1 basis. Proof of the required retirement shall be submitted prior to recordation of the final parcel or subdivision map. Retired lots shall have an open



space or conservation easement recorded against the title of the property to prohibit development in perpetuity. Easements may be held by the County or the County may grant them to another public agency.

The Population and Housing section of the Draft EIR summarizes information for housing and population in Cambria. The section describes the regulatory setting as follows:

- Growth in Cambria and San Simeon is constrained by available water supply and other resources that have not expanded capacity due to the water shortage. In San Simeon, there has been a moratorium on new development since 1986. County regulations ensure that new development can be accommodated within available supply.
- The County's Growth Management Ordinance is the primary regulation applying to both Cambria and San Simeon regarding residential growth. Adopted in 1990, the Growth Management Ordinance requires that the County set a target growth rate on an annual basis. For most of the 1990s, the number of new dwelling units allowed had been 2.3 percent of existing dwelling units. In late 1999, the rate was set at one percent due to long-term water supply constraints. This growth rate has continued to the present. There are a few types of housing that are not subject to this limit, such as farm worker and affordable housing projects. Growth management rates are not applicable to commercial recreational, institutional or industrial uses.
- In Cambria, properties that can develop new units within the County's yearly growth allocations are selected in order from the Cambria Community Services District (CCSD) water waiting list.

In addition, the Draft EIR refers to Lot Consolidation Requirements, Transfer of Development Credits and other limitations on residential construction which affect the amount of residential growth in Cambria.

Buildout Reduction Opportunities During Development of Draft Cambria Community Plan

The development of the Draft Cambria Community Plan could provide an opportunity to further build out reduction through land use decisions made by the County during the adoption of this critical planning document. For example, the County is proposing changes in the Land Use Category map that may directly effect the future allowable density in certain areas where lower densities could be applied. To further illustrate this point, proposed land use change number 10 in Figure 8 of the current plan recommends changing a residential area from multi-family to single-family residential. Much of the area where this change is proposed consists of single-family residential homes. Area where such rezoning could also occur include areas between Wood Street and Burton Drive, areas off of Paterson, and certain areas off of Buckingham Place, and Evansong Way. With very few exceptions, these existing areas are typically single-family residences with less than half the housing density allowed by the multi-family land use category.



2000 NORTH COAST AREA PLAN

The 2000 North Coast Area Plan (NCAP) Update included the community planning areas of Cambria and San Simeon as well as the surrounding rural lands. This plan followed a succession of earlier planning efforts, including a 1996 NCAP update that was approved by the County, but never certified by the Coastal Commission. The 2000 NCAP included development proposals for the East/West Ranch area in Cambria, as well as the Hearst Ranch to the north. Both of these proposals proved to be highly contentious, which may be the primary reasons that the 2000 NCAP update was never adopted. The 2000 NCAP update also identified a buildout projection for Cambria at 11,701 single-family dwelling units. The following references are cited from the 2000 NCAP:

- “Long-term demands for supplemental water should be integrated into planning for both the north and central coast areas. Possible future water sources for population centers of the North Coast Planning Area are the Nacimiento project, surface storage developed on, or near, one of the coastal creeks and desalination. In the near term, 1999-2002, the most feasible approaches appear to be conservation, retrofit programs, reclamation of wastewater and desalination.”
- “The County, the Community of Cambria, and others should work together in developing an open space district to begin purchasing many of the small and substandard lots in Cambria. The objective of the program is to preserve the forest from being physically displaced as the small lot areas build out with homes. Secondary benefits may be less building density, better fire clearance, more privacy between homes, larger yards, and more landscaping in neighborhoods.

Opportunity exists to begin a program to purchase some of the small substandard lots in Lodge Hill, Happy Hill, and Park Hill on an annual basis, and then commit them to open space. In conjunction with the forest management district, the lots can be used for a variety of purposes such as pocket parks, viewsheds, and habitat preservation, and other uses to benefit the community. The program will have an additional benefit in reducing crowding of buildings, traffic, water and service demand, and enhance the values of properties near open space lots.

The goal of the program in Cambria is to pursue actions sufficient to reach Plan Alternative Level III, which is a maximum number of 7,421 dwelling units. In an effort to further reduce significant unavoidable adverse impacts (such as water and traffic), a future general plan amendment should be initiated to consider additional alternatives that further reduce residential buildout densities in the Cambria area.”

As is evident by the referenced 2000 NCAP citations, there were great fluctuations in projected land use calculations and buildout potential. Although the May 2005 draft Cambria Community Plan now recognizes a total buildout of 6,130 dwelling units, the 2000 NCAP provides a historical perspective with reference to Cambria’s need for supplemental water options and the community’s commitment to pursuing programs



that would consolidate small and substandard lots. As noted in the 2000 NCAP, the lesser maximum dwelling unit count of 7,421 recognized the potential to reduce residential buildout densities and thus reduce significant adverse environmental affects.

As back up to the earlier 1998 era NCAP Update effort, the County also commissioned a study commonly referred to as the "Hausrath Study" to evaluate four growth scenarios and the resulting infrastructure costs to support each buildout value. The Hausrath report concluded that a Level III buildout number of 7,421 housing units would result in the lowest per unit cost for infrastructure improvements and land acquisition. In 1998, the County Board of Supervisor's subsequently modified their support of a 7,421 buildout level to the Hausrath study Level IV buildout of 5,152 housing units.

SAN LUIS OBISPO COUNTY LOCAL COASTAL PROGRAM

Periodic Review Final Recommendations

Coastal Commission staff completed a Periodic Review evaluation of the San Luis Obispo County Local Coastal Program (LCP) in 2001. Under the California Coastal Act of 1976, local government implementation of an LCP is the primary mechanism for achieving the resource protection goals of the Coastal Act. Section 30519.5 of the Coastal Act, though, requires that the Commission periodically review every certified LCP to determine whether they are being implemented effectively in conformity with the Coastal Act. Section 30519.5 gives the Commission an opportunity to identify beneficial changes to an LCP, based on an evaluation of local implementation and in light of changed environmental, social and economic circumstances that may have occurred since an LCP was first certified. Periodic Review allows for the incorporation of new knowledge into an LCP, and the adjustment of existing policies, programs, and implementation practices, informed by lessons learned about what works in the coastal management in California. The following is an excerpt from the Executive Summary of the 2001 Periodic Review:

LCP Recommendation 2.13

Continue implementation of the 1% growth rate in Cambria until 1/1/02, after which time coastal development permits for new development that would require a new water connection or that would otherwise create additional water withdrawals from Santa Rosa or San Simeon Creeks should not be approved unless the Board of Supervisors can make findings that (1) water withdrawals are limited to assure protection of instream flows that support sensitive species and habitats; (2) there is adequate water supply reserved for the Coastal Act priority uses of agricultural production, and increased visitors and new visitor-serving development; (3) a water management implementation plan is incorporated into the LCP, including measures for water conservation, reuse of wastewater, alternative water supplies, etc., that will assure adequate water supply for the planned build-out of Cambria or that will guarantee no net increase in water usage through new water connections (e.g. by actual retrofitting or retirement of existing water use); (4) substantial progress has been made by the County and the CCSD on achieving



implementation of buildout reduction plan for Cambria; and (5) there is adequate water supply and distribution capacity to provide emergency response for existing development.

The County has agreed with portions of this recommendation, including the need for the Coastal Commission and the CCSD to complete necessary studies and to pursue more proactive management of the water supply problem in Cambria.

Preliminary Recommendation 2.13 framed a number of alternative approaches to the Cambria water supply problem to help move the discussion of potential resource management responses forward. Commission staff met with the County and the CCSD, and considered the state of information, management actions taken by the County and the CCSD, and other matters related to this problem. Since that time, the CCSD completed an emergency well project upstream from an MtBE contamination plume, acquired the East-West Ranch property, acquired 220 lots from the Land Conservancy of San Luis Obispo County, retired additional residential lots from future water service, completed a draft water master plan update, and has initiated this build-out reduction study. During November 2001, the CCSD also enacted a water moratorium on any future water connections that were not already considered "in-the-pipeline" projects. In addition, the CCSD has since initiated additional water conserving measures, including rebates for water-efficient clothes washers, and conversion of regenerative water softeners to non-regenerative softeners. More recently, the CCSD has focused its efforts on a desalination project for long-term supply and agreed to enter into an agreement with the Army Corps of Engineers for completion of a desalination project as part of a Water Resource Development Act-funded project.

LCP Recommendation 2.16

The LCP needs to be amended to address long-term development potential in Cambria. The County should work to expand the TDC Program by identifying other sensitive areas that would benefit from transfer of potential development to more suitable locations. Expansion should include Special Project Area #2, as well as watershed areas, other scenic corridors and other small lot tracts in undeveloped areas that support significant coastal resources, particularly contiguous blocks of sensitive pine forest habitat. More aggressive policy options should be considered as well, including development of an Assessment District to retire lots, create open space and promote forest protection. Other mechanisms should be evaluated such as the ability to use mitigation fees or erosion control fees to address long-term buildout. Further attention could be focused on alternatives for reducing development potential on single and double lots and creating incentives for the minimum lot size of 7,000 square feet. As part of this process, the County should establish a task force charged with identifying management options and strategies for reducing buildout in Cambria by a specific deadline.

The County has agreed to consider the various portions of this recommendation. Considerable public comment has been received on the question of build-out in Cambria. As discussed under Recommendation 2.13, buildout reduction in Cambria is one component of a comprehensive strategy to assure that future development in



Cambria is environmentally sustainable, particularly with respect to available water supplies. However, buildout reduction would also address existing constraints in traffic capacity, schools, forest protection, etc. The debate between the County and other's interest in a buildout reduction strategy, essentially revolves around what is a realistic estimate of, and/or proper methodology for identifying the buildout potential in Cambria. The Commission has relied on the County projections in previous discussions. The County projects potential future development through an analysis of existing legal lots that could conceivably be developed to the level allowed under current zoning (the "absorption capacity"). Others have suggested that if more realistic assessment of lot characteristics and ownership patterns is completed, that the actual buildout potential for Cambria is much less.

Although there are many details to be considered in understanding the buildout analysis for Cambria, a critical issue for the Coastal Commission is not so much what the projected buildout is precisely, but rather, the coastal management measures that will be put in place to assure that the buildout of Cambria is reduced sufficiently to be environmentally sustainable. Most people concerned with growth in Cambria agree that a reduction in the theoretical capacity for Cambria to grow is necessary if Cambria is to be a sustainable, livable community that protects its coastal environment. Many have cited population estimates far less than the population theoretically attained under full buildout of existing legal lots under current zoning. Economic studies conducted for a previous NCAP Update (e.g., prior 1997-era Hausrath Study) concluded that a 37 percent reduction in buildout capacity would be the most effective strategy for the community in terms of minimizing infrastructure costs.

Finally, it is critical that the North Coast Community Plan contain policies and programs that support an environmentally sustainable buildout objective for Cambria, regardless of what the theoretical maximum buildout for the community may be. This was the point behind the Commission's 1998 NCAP modification to encourage that a ballot measure to promote buildout reduction through an open space district be supported by the County and the CSD. As discussed in Chapter 4.0, there are many other possible strategies to reduce the potential development in Cambria as well. Ultimately, the Coastal Commission believes that the NCAP and LCP must work in such a way as to assure that the buildout of Cambria is environmentally sustainable, which includes having adequate infrastructure to support the identified buildout goal.



Chapter 4.0 MAPPING AND SUPPORT DATA



4.0 MAPPING AND SUPPORT DATA

This chapter describes the mapping efforts that were undertaken to support the buildout reduction strategy and the development of datasets used for analysis and mapping in this report. Starting with a parcel land base map that was developed for the CCSD over the last several years, line work was updated and additional layers were added, including aerial photography, land use, and structure footprints. These layers were used throughout the study to create maps and accomplish analyses used in the decision making process.

DATA TO SUPPORT THE BUILDOUT STRATEGY

The data developed for this project is designed to support the strategy presented in Chapter 5. The “toolbox” for reduction includes five focused areas, some of which can be addressed or verified using the data developed for the GIS.

In the first focus area, the strategy looked at current CCSD programs including grandfathered parcels and the water wait list. The grandfathered parcels and the wait list which was current at the time of this study was associated with the parcels they represent in the mapping and the appropriate wait list position was assigned to parcels on the list. Another CCSD program included restricted use of parcels through an agreement with the CCSD. These restricted or retired parcels have been mapped based on a list of such parcels developed by the CCSD. The use of these retired parcels in the analyses is described in more detail in Chapter 5 and in the technical discussion below. Finally, the strategy describes parcels that are subject to deed restrictions and CC&R's which potentially limit the development of certain parcels from reaching their maximum buildout potential. Although only a small portion of such parcels was identified at the time of this report, prior estimates by CCSD staff reduced theoretical build-out potential within these areas by approximately 1,016 housing units.¹ Similarly, enforcement of specific pre-existing service and transfer agreements further reduced theoretical build-out potential by approximately 527 housing units.² Further investigation of additional tracts is needed to determine whether the potential exists for any additional buildout reduction potential due to deed restrictions.

Since the status of these lists, ownerships change constantly, the data used for analysis in this study is a snapshot and represents the status as of the time the data was linked to the mapping. As changes are made to the lists and the GIS is updated, new analyses can be made to represent current and future status. However such small changes over the time this study was prepared are not expected to impact the recommendations made in this report.

The second focus area is voluntary density reductions to be accomplished through various incentives. For this focus area, the physical and ownership characteristics of

¹ Draft comments attached to November 1, 2004 letter from CCSD's Robert Gresens to San Luis Obispo County's John Hofschroer regarding Public Review Draft, Update to the Cambria and San Simeon Acres Community Plans of the North Coast Area Plan.

² Ibid.



the individual lots can be used to identify characteristics which would lead to the potential of merger or other programs and to develop a list of owners to contact who may be interested in participating in such a program.

The third focus area is development constraints. Many previous studies have looked at various factors which could limit the development of parcels. The GIS data for this study included topography from the United States Geological Survey (USGS) for slope and elevation, as well as the physical characteristics of the lots such as area and frontage. These characteristics were noted in the GIS database and may be used in some future refinement of the buildout reduction strategy. The development constraints also include an examination of expansion of the fire code provisions and what affect they might have on buildout reduction on a gross basis throughout neighborhoods within the CCSD. A discussion of the potential Fire Code factors examined is provided in Chapter 5.

The fourth focus area included land use regulations. An extensive review was made of land use regulations both approved and pending, and a final land use scenario was built for the GIS which combines current adopted land use modified to take into account proposed changes in the current area plan. Areas outside the urban reserve line which were within the CCSD boundary were assigned land use factors consistent with the proposed CCSD Water Master Plan. Some land use factors were changed to make categories consistent for the purposes of this study. The land use values identified through this process were then used to identify residential designated lots, which were the primary focus of this buildout reduction program.

Among the adopted land use regulations are policies which affect the potential development and subdivision or merger of an individual lot. Such size and density restrictions were the basis of some of the calculations presented in this study. Details on specific factors in the land use regulations are described in Chapter 5.

The final focus area includes property acquisition. The GIS was used to provide the analysts with counts of residential lots and the physical characteristics which would aid in identifying the potential application of this strategy.

GIS DATA ORGANIZATION

The GIS for the CCSD consists of parcels which have been updated with information from the County of San Luis Obispo as of November 2004. Each parcel has been calculated to identify its physical characteristics including street frontage and gross area. This allows the GIS to distinguish between small lot subdivision lots and larger lots. For the purposes of the GIS, a lot is defined as an individual legal ownership. Therefore there may be several lots within a single APN due to the historical way the County has allowed consolidation of tax bills. Based on this definition of lots, a total of 12,477 lots were identified within the CCSD District Boundary.

In addition to the physical characteristics of the lots, land use was added for each lot based on the outcome of the discussions with County staff with regard to revisions to the Cambria area land use plan. Since this included land use for the areas within the Urban Reserve Line (URL) only, land use provided by the CCSD GIS System for lands between the URL and the CCSD boundary was utilized. Exhibit 4-1 shows this



land use for the entire CCSD area. The GIS analysis for the purposes of the Buildout Reduction Study focused on residential lots only. Exhibit 4-2 demonstrates the residential land uses for reference. For the purposes of the Buildout Reduction Program, the lots that were designated Residential Single-Family and considered in this study totaled 11,613 lots.

For the next part of the GIS analysis, it was necessary to determine the lots which contained a structure and therefore were considered “developed”. A visual survey was done using high resolution orthographic aerial photography which was flown in September 2003 by AirPhoto USA and supplied by Barkley Maps (refer to Exhibit 4-3, Vacant Residential Lots). By overlaying the lots derived in the analysis above over the aerial photography, each lot was evaluated to determine if it contained all or part of a structure. A lot was considered developed if it contained all or part of a structure. It should be noted that due to the inherent inaccuracies in the lot base mapping and in the aerial photo registration, it is expected that there will be some offset between the lot lines and the structure locations with their precise position on the ground.

In many cases, a structure would cover more than one lot. In this case these multiple adjacent lots containing the structure were all marked as developed. It is believed that this is a good indication of the existing condition and will produce the best results for the buildout reduction program. This approach is supported by the County’s stated policy of “no net increase” of lots from development and the CCSD’s ordinance enforcing the Fire Code which requires the installation of a fire rated wall within three feet of lot line. In cases where a structure straddles an interior lot line, it is usually more practical to merge lots than to install a fire-rated wall within the structure. After evaluating the lots in this way, a total of 6,647 single-family residential lots (SFR) and 191 multi-family residential designated lots (MFR) were identified that contain all or part of a structure. This leaves 4,966 SFR and 119 MFR lots with no apparent structure which are likely candidates for future connection requests (refer to Exhibit 4-4, Developed and Vacant Single-Family Residential Lots).

Ownership records for individual Assessor Parcels (by Assessor Parcel Number (APN) were received from the County and used in the GIS to analyze the individual lots identified above for common adjacent ownership. The ownership records were reviewed manually to identify where similar names or groupings of family members could be recognized from the group of owners of record. Note that a single APN may consist of multiple internal lots. In this case, these individual legal ownerships are in common adjacent ownership. Following this methodology, the analysis identified a total of 1,443 lots which had one or more common adjacent owners. From this total there were 446 groupings of two lots. Of the remaining, there were 91 groupings of three lots, 21 groupings of four lots, and finally 21 groupings of 5 or more. Thus, if these lots were to merge into single ownerships (one lot per individual ownership), the original 1,443 lots could potentially be reduced to 571 individual lots. This represents a reduction of 864 lots from common adjacent ownership. Another measure which was considered is if for every grouping, a total of two lots merged to form a single lot, leaving the remaining lots not merged for other purposes. This analysis produced a lot reduction of 579 lots. It should be noted that these numbers represent the theoretical maximum and thus some smaller number would be expected from a voluntary lot merger program.



In Chapter 5 of the Buildout Reduction Program, it is indicated that there are lots which are subject to covenants and agreements with the CCSD which restrict the use of the lots. These lots, also referred to as “retired lots” cover a total of 389 of the single-family residential lots. It should be noted that at this time, the retired lots were identified by APN. If an APN contained more than one legal ownership within the parcel, all the lots in that parcel were marked as retired. More research on individual retired lots is recommended to identify where this may not be true. Also, there were two lot retirement agreements in process during the preparation time period for this report. These two agreements were included in the total of retired lots.

As stated in Chapter 5, there is an effort on the part of several conservation groups in concert with the efforts of the CCSD to purchase lots for the purpose of permanent conservation. These groups include Greenspace, the Nature Conservancy, and the Land Conservancy of San Luis Obispo County. For the purpose of the Buildout Reduction Program, lots have been identified which are designated as single-family residential and which are owned by one of these groups or the CCSD and have removed them from further study. Once the otherwise retired lots have been removed, the CCSD and conservation-owned lots total 150 within the single-family residential land use within the CCSD boundary.

Removing the “retired lots” (389) and the “CCSD and conservation owned lots” (150) from the pool of 4,966 single-family residential lots which were identified above as likely candidates for future connection requests leaves a total of 4,427 lots which require further study for buildout reduction.

From CCSD billing records, there are currently a total of 3,764 residential housing unit connections. Since there are 11,613 total lots, that leaves 7,849 lots without connections. This number is much larger than the 4,966 lots with no structure on them. This difference can be accounted for by structures which apparently cross into multiple lots. The approach at this time is that since such a structure exists and the CCSD has review procedures in place that require a fire rated wall with no openings when a structure is within three feet of a lot line (alternatively, a merger of the multiple lots is allowed for addressing structures straddling interior lot lines), what is counted is only the totally empty lots as potential new connections and not the removal of an existing structure to make way for multiple connections. The GIS and these basic numbers therefore, are used to support the buildout reduction strategies presented in Chapter 5.

With regard to lots within the multi-family designated land uses, the total number of lots designated as multi-family by the land use map is 310 lots. By segregating the lots by their size in acres, it is easier to see the distribution of such lots within the CCSD. Many of the lots designated as multi-family in the land use plan already contain a single family residence. To accommodate this anomaly and for the purpose of this study, the CCSD has assumed that for any lot where an existing structure exists, the lot will be considered built and the number of connections will remain the same into the future. For the remaining vacant multi-family designated lots, the CCSD has assumed that small lots (smaller than 0.24 acres or about 10,454 sq ft) will only be able to accommodate one residential dwelling unit. For the remaining larger lots, we have used the density factor recommended in the County’s Area Plan document of 15 DU/AC. Thus using the calculations shown in the table



below, the total number of potential future multi-family dwelling units based on these assumptions is 311.

| | | | | |
|---|--|--|--|--|
| Cambria Lot Reduction Study Residential Multi Family | | | | |
|---|--|--|--|--|

| Size in Acres | | Vacant | Built | Total |
|---------------|------|------------|------------|------------|
| From | To | | | |
| 0 | 0.08 | 75 | 72 | 147 |
| 0.08 | 0.16 | 26 | 70 | 96 |
| 0.16 | 0.24 | 9 | 24 | 33 |
| 0.24 | 0.5 | 4 | 10 | 14 |
| 0.5 | 1 | 0 | 8 | 8 |
| 1 | 5 | 4 | 6 | 10 |
| | 5+ | 1 | 1 | 2 |
| Total | | 119 | 191 | 310 |

| Vacant Multi Family Lots | | | | |
|--|-------------|-------|-------|------------|
| Size | Vacant Lots | Acres | DU/AC | MF-DU's |
| < 0.24 AC | 110 | | | 110 |
| > 0.24 AC | 9 | 13.4 | 15 | 201 |
| Total Potential Multi-Family Units: | | | | 311 |

REVIEW OF COUNTY BUILDOUT METHODOLOGY

One exercise which was accomplished during the development of this study using the GIS, was a reconstruction of the saturation buildout analysis prepared by the County of San Luis Obispo in various iterations of the adopted and proposed community plan. The current table can be found in the current version of the County's Community Plan document for Cambria. It should be noted that there is a distinct difference in the approach taken by the County staff in determination of their buildout numbers and the one undertaken by the CCSD for use in this study. The CCSD took the approach in this study of identifying each lot or legal ownership within the CCSD boundary and determining the lot's characteristics for use in analysis. The County's alternative approach involved calculation of gross area for specific land uses and applying density factors and policies to determine the saturation capacity and ultimate buildout.

In order to review the County's methodology and previous buildout estimates, the GIS was used to produce gross acreages for individual land uses similar to the County's methodology. By applying the County's density factors to each of the land use categories, the CCSD was able to highlight some of the discrepancies in older versions of the County's Absorption Capacity Worksheet. By reviewing these discrepancies through a series of meetings and conference calls with County planning staff, the CCSD assisted to identify and resolve these differences that were



discovered. Where appropriate, the CCSD's GIS was updated to make it more accurate relative to the land use categories and physical boundaries. In many cases, the differences highlighted proposed changes county staff was recommending to the current draft of the community plan. Differences which still existed following the discussions were documented with other CCSD comments in a response letter to the County on the community plan draft dated November 1, 2004.

GIS ANALYSIS AND FIRE CODE PROVISIONS

Chapter 5 presents a discussion of the potential application of fire code provisions to identify areas within the CCSD which possess public safety issues due to fire potential. The GIS was used to map the fire potential using information provided by the State of California and local CCSD fire personnel. The maps prepared include digitization of the fire severity zones provided by the state and updated for local influences by the local fire authority, and a map of areas designated as potential fire danger due to the chimney effect. These boundaries were review with local fire authority staff and deemed to be appropriate for the purpose of the lot reduction analysis. The exhibits show the fire prone areas. These results will be useful for any future implementation of the Fire Code provision to help define the lot reduction strategy. A detailed analysis was also performed on areas which had restricted access due to steep streets or narrow roadways which would hinder the movement of emergency vehicles. Please refer to Exhibits 4-5 through 4-9 which depict fire condition factors throughout the community.



Chapter 5.0 BUILDOUT REDUCTION STRATEGY/TOOLBOX



5.0 BUILDOUT REDUCTION STRATEGY/TOOLBOX

This chapter presents strategies for Buildout Reduction. The “toolbox” presents various program options ranging from current CCSD policies to more aggressive measures to achieve the goals. The program includes five (5) focused area approaches which include:

- Current CCSD programs;
- Voluntary Density Reduction;
- Development Constraints/Attrition;
- Land Use Regulations; and
- Property Acquisition.

The most significant potential for future development within Cambria rests with the undeveloped single-family residential lots created by subdivision in the early 20th century. Approaches to development reduction that focuses primarily on these undeveloped lots and parcels are presented in this Buildout Reduction Strategy. The most effective Buildout Reduction Program will include a combination of these approaches that appeal to a diversity of property owner preferences and to meet the overall build-out reduction goal for the area. Exhibit 5-1 presents the Cambria Lot Reduction Model, which is the basis for achieving the CCSD residential housing unit connection goal of 4,650.

I. CURRENT CCSD PROGRAMS

Several existing provisions are important to the success of the Buildout Reduction Program. They should continue in their current state and, as indicated in the example of parcels subject to deed restrictions and CC&Rs where the authority to enforce restrictions lies with other property owners, there may be additional opportunities for reduction under those provisions.

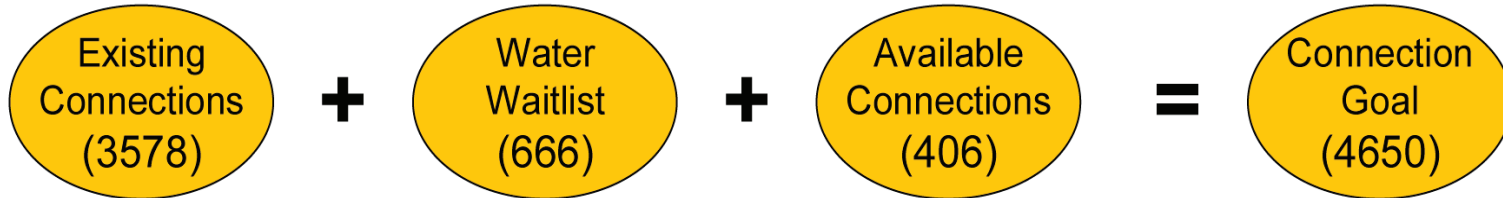
A. CCSD Water and Sewer Allocation Ordinance

The CCSD’s Water and Sewer Allocation Ordinance (Chapter 8.04 of the CCSD Code) references three (3) provisions for extending water services to new customers. It is recommended that the program continue in its current state, with no further amendments. The following briefly describes each of the three service provisions:

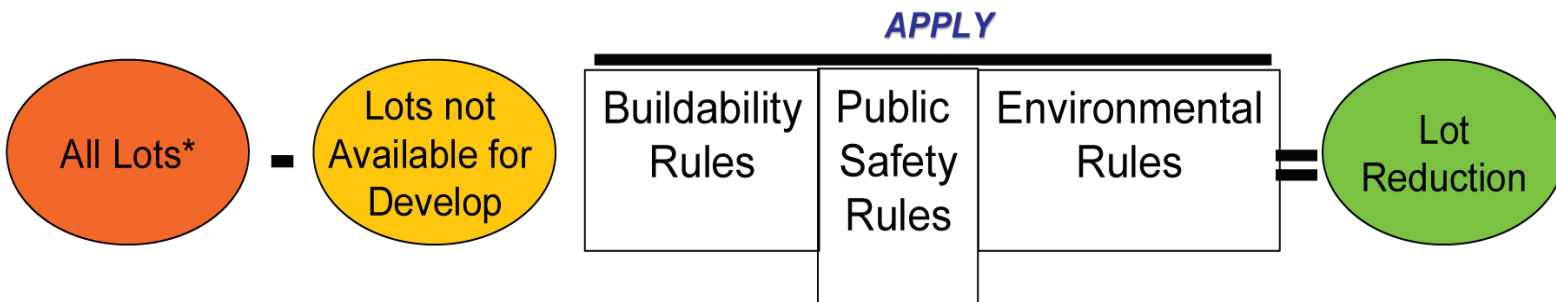
1. Outstanding Service Commitments

The first method of allocation is from “outstanding service commitments”, i.e., those parcels that the CCSD has determined have “grandfathered” rights. By “grandfathered”, the CCSD means that, although not currently in use, a water meter connection fee has been paid or a physical connection has been made to a parcel. These property owners pay a minimum bi-monthly service fee to maintain their status.

- Lot Reduction Goals
- Buildout Model (*approx. 4650 Total Lot Connections*)



- Justify or Meet this Goal through:



* All Lots = Built + Vacant



2. CCSD Wait List

The second method of allocation is from the CCSD's waiting list. There are approximately 690 positions on the CCSD's residential water waiting list (666 single-family and 24 multi-family positions). Pursuant to Section 2.5-5 of Ordinance No. 14-90, enacted to conform with the provisions of Section 26.01.070h(2) of San Luis Obispo County Ordinance No. 2477, effective December 31, 1990, residential applications for the water and sewer waiting list are no longer taken. (CCSD Code, Section 8.04.070(A).) The placement of a proposed project on the waiting list does not entitle the applicant to service, nor will the CCSD issue an intent to serve letter based on being on the waiting list. (CCSD Code, Section 8.04.070(C).) At this time, all positions on the waiting list are on hold.

3. Water Meter Transfers

CCSD Code Section 8.04.100 allows property owners the privilege of transferring single-family residential water meters or single-family residential water meter wait-list positions between two lots. These transfers are allowed on the condition that the applicant agrees to permanently retire the development rights on the lot from which the water meter or water meter wait-list position was transferred, or an alternate building site, per the CCSD code. To date, nearly 400 lots have been retired through this program. A significant number of lots on the CCSD's wait list may be likely candidates for retirement under this program.

B. Owner/CCSD Initiated Lot Retirements

On occasion, lot purchase opportunities are presented to the CCSD by property owners. The CCSD has taken an active role in working with lot owners that initiate such an interest. The CCSD will continue to have interest in working with property owners in order to retire lots.

C. CCSD Code Section 8.04.040(G)

The CCSD's Code Section 8.04.040(g) provides that no new commitments shall be made, and no wait list position shall be transferred, to parcels where such service would be in violation of real property covenants or restrictions. Due to this prohibition, several parcels are restricted from receiving service. The following parcels and types of parcels are subject to these restrictions.

1. Parcels Subject To Covenants And Agreements With The CCSD That Restrict The Use of Said Parcels

The CCSD has entered into approximately 560 (retired lots) agreements entitled "Covenant And Agreement Restricting Use Of Property." These agreements permit a property owner to transfer water connection rights from that owner's Sender (Old) Property to the owner's Receiver (New) Property. (CCSD Code, Section 8.04.100.) Under these agreements, a property owner is permitted to transfer certain development rights from



that owner's "Sender Property" to the owner's "Receiver Property" that contains not less than 3,500 square feet of area (or if the property contains less than 3,500 square feet of area, the property has two underlying lots and 40 feet or more of street frontage) and is not in the Lodge Hill Special Project Area No. 1. In consideration of the CCSD permitting a transfer of the position from the Sender Property to the Receiver Property, the owner covenants and agrees to the CCSD to restrict the use of the properties as follows:

- a. The Receiver Property, if comprised of more than one legal lot, shall be merged pursuant to the Subdivision Map Act into one legal lot no later than 90 days from the date of the Covenant.
- b. No water or sewer service shall be requested of CCSD or made available by CCSD on the Sender Property, and the owner covenants not to drill or utilize any well on the Sender Property from and after the date this Covenant is executed by both parties hereto, unless all of the following conditions are met:
 - The Sender Property is merged pursuant to the Subdivision Map Act with adjacent property so that the adjacent property and the Sender Property would be one legal parcel (hereinafter called the "Merged Parcel"). The combined area of both properties together must be at least 3,500 square feet, or in cases where the combined area of both parcels is less than 3,500 square feet, that such parcels combined have two underlying lots with 40 feet or more of street frontage;
 - Water and sewer service by the CCSD to the Merged Parcel will be limited to that allocated to the adjacent property on the date of this Covenant pursuant to CCSD ordinance in effect on the date of this Covenant, and it shall be a violation of this Covenant to provide water or sewer service to any separate or adjoining structure with an additional kitchen; and
 - This restriction shall not apply in the event that the Sender Property is deeded to and accepted by the CCSD for any CCSD purpose, or deeded to and accepted by the County of San Luis Obispo or the State of California for purposes of public recreation or other public facilities purposes.
- c. In the event there are any structures or improvements on the Sender Property, excluding any utilities, "Historic Buildings" as that term is defined in CCSD Code Section 08.04.010, or structures ancillary to Historic Buildings, Owner agrees to demolish and completely remove such structures or improvements from the Sender Property to CCSD's satisfaction prior to CCSD



allowing use of water and sewer services on the Receiver Property.

These agreements provide the CCSD with the right to enforce the obligations. Aside from such contractual rights, the CCSD could notify the County that there is a restriction on the number of connections that the CCSD will honor on the properties and that no additional connections will be permitted. The CCSD could take this position pursuant to such existing Covenants and Agreements as well as the ordinance that imposes such restrictions.

2. Parcels Subject To Deed Restrictions And CC&Rs Where The Authority To Enforce These Restrictions Lies With Other Property Owners

In contrast to the Covenants and Agreements set forth above, the CCSD is not a party to the following restrictions and therefore, would not be in a position to enforce these obligations. Such enforcement lies with neighboring property owners, review boards, homeowner's associations, etc. However, a determination of which parcels are subject to these restrictions can be made at the time the CCSD is required to act on an application for connection at which time the reference can be made to implementation of CCSD Code Section 8.04.040(G).

- a. Deed Restrictions. Deed restrictions apply to certain properties located within the service area of the CCSD. The power to enforce the restrictions resides in all future owners of record of buildings sites on said property. (Owners also include the original owner or the development's review board.) Such deed restrictions impose requirements on the following: (1) the size of building sites; (2) the character of buildings (for example, no building may be erected or maintained except one private dwelling house not more than two stories in height above the main floor level, designed for occupation by not more than one family); and (3) setback and location of buildings.
- b. CC&Rs. In addition to deed restrictions, certain legal documents known as Covenants, Agreements and Restrictions (CC&Rs) apply to certain tracts. These CC&Rs run with the properties and are binding on all parties having or acquiring any right, title or interest in the properties or any part thereof, and inure to the benefit of each owner thereof. Such CC&Rs impose requirements on the following: (1) the size of building sites; (2) construction of units must comply with architectural committee rules; (3) the character of buildings (for example, no building may be erected more than two stories in height above the main floor level); (4) the properties and lots are located within the CCSD and owners of lots will be treated and individual service connections will be provided in accordance with the rules and regulations of the CCSD that are in effect at the time such connection and/or



individual water service is requested; (5) the original developer or any owner shall have the right to enforce, by any proceeding at law or in equity, all restriction, conditions, covenants, reservations and charges now or hereafter imposed by the provisions of the CC&Rs.

- c. Service Agreements Limiting Connection Capacity. The CCSD has certain service agreements in place with various property owners and successors in interest that limit development potential below that which may otherwise be allowed by current planning standards. Examples of where such service agreements apply include the Cambria Pines Lodge property and Camp Yaeger property. The on-going administration and enforcement of these existing service agreements will further promote build-out reduction in cases where an allowable County standard would allow higher densities under a particular land use category.

The CCSD has obtained several examples of agreements and restrictions from the County and local real estate industry. In addition, local title companies are likely to have copies of these and other agreements or restrictions. The CCSD may choose to further the extent of tracts/parcels subject to Deed restrictions and CC&Rs at this time. A determination of which parcels are subject to the restrictions can also be made at the time the CCSD is required to act on an application for connection, at which time the reference can be made to application of CCSD Code Section 8.04.040(G).

D. Fire Code Plan Check Enforcements

The Cambria Fire Department routinely reviews plans for new homes and remodels to ensure compliance with fire codes. As part of this review process the Department checks proposed projects for compliance with UFC IIII.I, which further references the Building Code requirement for no openings as well as a fire rated wall when a structure is less than three feet from a property line (California Building Code Section 503.2.1). In cases where an underlying lot line exists due to the property not having been merged, the Department advises the owner of the need to either merge the properties or provide a fire rated wall. Therefore, the enforcement of this provision of the UFC during such plan reviews should continue to serve as a direct incentive for certain property owners to merge their existing lots. (Also see discussion on voluntary lot mergers under paragraph IIB.)

II. VOLUNTARY DENSITY REDUCTION

Some property owners will never voluntarily exercise their maximum development rights. For example, some owners prefer to develop at lower densities by building one house on multiple lots. Because of the small size of lots in Cambria's substandard subdivisions, this development characteristic is particularly pronounced. Previous studies commissioned by San Luis Obispo County have assumed that the maximum allowable density under the existing lot consolidation ordinance averages



one dwelling unit per 1.9 lots. Existing development densities in Cambria's substandard subdivisions average one (1) dwelling unit per 2.3 lots per dwelling unit. Thus, voluntary density reduction for developed parcels in Cambria's substandard subdivisions is occurring at an overall rate of about 76 percent less than the maximum allowable density.

A local jurisdiction has several options for increasing voluntary density reduction by providing property owners with assistance and financial incentives. These programs, their current use in Cambria, and their applicability to the development reduction strategy are discussed below.

A. Transfer of Development Credits

The County of San Luis Obispo's TDC provisions, applied countywide, are contained in Sections 22.04.500 through 22.04.580 of the County Code. These sections provide procedures allowing for the voluntary transfer of development credits from one parcel of land to another. Transfer of Development Credits (TDC) typically does not retire development rights but, rather, moves them from one area to another. The County has its own variation of TDC in Cambria. Property owners in designated areas may exceed permitted building size in exchange for retiring development rights for lots located in Special Project Areas, designated by the County due to sensitive habitat, or steep slopes. Under the Cambria TDC program, property owners pay a fee, which is used to purchase lots and retire development rights.

Section 23.04.440 specifically applies to portions of the Cambria/Lodge Hill area and facilitates the transfer of development credits from sensitive areas of the "special project area" within Cambria/Lodge Hill to other less sensitive areas within this special zone. Development credits may not be transferred outside of the "special project area". The "special project area" is set forth in the County Code.

The existing County ordinance permitting applicants to transfer development credits from one lot to another should be expanded to provide incentives for lot owners to transfer development credits from one lot to another in exchange for expansion of a residence beyond the otherwise permissible square footage (or other development incentive) and retirement of the lot from which development credits were transferred.

B. Lot Mergers

Through San Luis Obispo County's property boundary line adjustment process, it is possible to combine two or more lots into one. Depending on how the property is zoned, a lot merger is one possible way to reduce development rights. Property owners of contiguous lots can retire development rights in this manner to ensure a permanent buffer between them and their neighbor's property.

Some property owners of contiguous lots may also be a perceived property tax incentive. For owners of contiguous lots, there may also be a property tax



incentive to merge parcels. Insofar as developmental rights contribute to assessed value, the elimination of an unneeded development right should reduce the assessed value of the combined lots and the corresponding property tax liability.

In most cases, the goals of retiring development rights and reducing assessed value could also be achieved through conservation easements, which are discussed below. A conservation easement prohibits development on a specific lot. A lot merger, on the other hand, reduces overall development rights for a property holding of contiguous lots, but permits the dwelling unit to be located anywhere on the property.

Unfortunately, the present lot merger process offers little incentive to use lot mergers to reduce development rights and /or realize property tax benefits. Property holdings of two to three contiguous lots, which comprise the majority of property holdings in Cambria's small lot subdivisions, are limited to one dwelling unit by the County's Lot Consolidation Ordinance. In such cases, lot mergers would do nothing to reduce development rights, or to reduce property tax.

The primary disincentive for those who might consider lot mergers is the time and monetary costs involved. To process a lot merger, a property owner must complete a voluntary merger application, and provide the county Department of Planning and Building with an Assessor's parcel map, copies of the title documents that created the parcels in question, and a copy of a preliminary title report. Further, in order to reduce a property assessment, a property owner must make a formal request to the County Assessor. Such an application requires documents supporting a reassessment, typically evidence of the values of two to three comparable properties. These must be obtained from a professional real estate broker. Due to the cost and inconvenience of the lot merger process, lot mergers are not widely used. Cambria has only about five mergers on an average annual basis.

The County has taken steps to make lot mergers more attractive by streamlining the merger process. A Voluntary Merger Package provides information on the application process. (Advice and assistance with preparing applications are available by appointment.) Fees for simple voluntary lot mergers in Cambria's small-lot subdivisions are generally lower than larger, more complex subdivision requests. Further, the County processes applications relatively fast, with processing times ranging from one day to two months at the most.

Some additional ways the County and the CCSD could facilitate applying for a lot merger include the following:

- Maintain and easily make available Assessor's parcel maps for attachment to the application, rather than forcing the property owner to make a special trip to the Assessor's Office.



- Promote mergers through community bulletins, notices enclosed with the annual property tax statement, and other promotional activities.
- Have the County delegate to the CCSD the authority to assist with merger applications, and/or assist in the application process, in Cambria, rather than forcing the property owners to go to the County's offices in San Luis Obispo.
- Implement a letter writing campaign, supported by the CCSD, to affected property owners.

In summary, in order to promote lot mergers, the County and the CCSD should work together to undertake steps to streamline the merger process. Information, advice and assistance in preparing lot merger applications should be promoted by the CCSD and available at the CCSD offices.

C. Conservation Easements

The Federal and California State governments recognize conservation easements as tools to preserve land from development. Ownership of land entitles the holder to develop or otherwise extract economic benefit, subject to governmentally imposed land use controls. Under a conservation easement, the owner accepts a restriction on the use of his or her property, and the foregone value of that use is treated as a tax-deductible charitable contribution. Only the right to develop is relinquished, and the original owner retains possession of the land, including the right to exclude public access. If the land is sold, the development restriction holds for subsequent owners in perpetuity.

In many cases, conservation easements may be a desirable option for retirement of development rights in Cambria. Conservation easements may be used for a broad range of purposes, including preservation of wildlife habitat, forests, farmland, historic buildings and sites, and open space. Open space is the most widely applied of the categories, and is relevant to Cambria's buildout reduction goal.

Finally, conservation easements restrict any major improvements. This means that an owner wishing to build on a double lot would have to locate all structures on the unrestricted parcel. Such an owner might prefer a lot merger instead to retain more flexibility over the placement of improvements. For many property owners in Cambria's small-lot subdivisions who desire to create a buffer around their property, it is usually more attractive to simply purchase adjacent properties, with the intention of never building on them. However, this does not place any permanent legal restriction on development.

The conservation easement concept presents unique opportunities for Cambria. Several factors work to Cambria's advantage, making it possible to implement a conservation easement program that could be administered efficiently and with reasonable cost. For example, all lots are located within the same jurisdiction and area subject to the same economic forces. Thus, several steps in the conservation easement process may be standardized. Information and application materials should be made available in a packet offered by the



CCSD. The CCSD should be a financial participant in the acquisition of conservation easements by working cooperatively with land conservation organizations.

D. Lot Development Rights Acquisition Program

An aggressive lot acquisition program was undertaken several years ago by the Land Conservancy of San Luis Obispo County ("Land Conservancy") with funds provided by the California Coastal Conservancy. The Lodge Hill Restoration Plan is a program to assist the County of San Luis Obispo and Cambria in resolving a very difficult issue that has troubled property owners, residents, and County officials for many years: the development of a very poorly subdivided area in Cambria known as Lodge Hill. The San Luis Obispo County Land Conservancy has prepared this plan with financial and technical assistance from the State of California Coastal Conservancy.

To date, more than 250 lots have been retired and conveyed to the CCSD under that program, with a conservation easement retained by the Land Conservancy. Funds for acquisition of additional lots will be made available to the Land Conservancy by the California Coastal Conservancy in the near future. Additionally, the Cambria Land Conservancy and Greenspace have engaged in limited lot acquisition programs and the Nature Conservancy has acquired a conservation easement that limits buildout of the Central Coast Ranch to five residences. The CCSD has also contributed financially to acquisition of the East-West Ranch. The CCSD should actively assist land conservation organizations by providing funds to be matched with other governmental contributions and private donations to accelerate the rate of lot acquisitions in Cambria and undertake the maintenance obligations of such lots. There are several potential sources of funding available to the CCSD for active participation in a lot development rights acquisition program, including grants from the Federal and State governments, private land conservation organization funds, future connection fees, and Mello-Roos CCSD proceeds.

The authority of the CCSD to contribute funds, and to otherwise participate in such a program, would need to come from its park and recreation powers or from requirements that may be imposed to acquire properties in connection with mitigation measures and the EIR for the proposed desalination plant.

E. Financial Incentives

Transfer of Development Credits, lot mergers, and conservation easements each support the voluntary density reduction already taking place in Cambria. The County or the CCSD could potentially increase the current rate of voluntary density reduction if they absorbed some of the processing costs of TDCs, mergers, or easements to make these options more attractive. These costs include surveys, appraisals, and legal documentation. Funding for financial incentives would have to be identified. Sources could include a special tax imposed pursuant to a Community Services CCSD or an assessment imposed within a defined area of benefit referred to as an assessment district.



Given the current overall rate of voluntary density reduction in Cambria, it is unlikely that financial incentives (in the form of costs absorbed by the CCSD) would significantly increase that rate. Property owners are already availing themselves of the options discussed for TDCs, mergers and easements. To some degree, financial incentives would only subsidize activity already occurring on a voluntary basis. Thus, as a stand-alone program, these types of financial incentives might not justify themselves on a cost/benefit basis. However, there are still several reasons why these types of incentives may be an appropriate component of the overall buildout reduction strategy:

- If the CCSD launches a large-scale property acquisition program (see Subsection V below), it will expand its in-house capacities and supplier relationships for acquisition-related tasks such as surveys, appraisals, etc. In this way, the CCSD can achieve cost efficiencies that would not be available to individual property owners.
- Successful implementation of the buildout reduction program (especially a land acquisition program) will require a marketing effort to make eligible property owners aware of available options. During the course of the CCSD's efforts to identify willing sellers for the land acquisition program, it is likely that overall awareness of other buildout reduction strategies (such as the financial incentives to encourage voluntary mergers, etc.) will also increase. This increased attention may result in a "new wave" of property owners interested in voluntary density reduction (i.e., property owners who were not previously aware that these options exist).

Economic activity depends on the successful matching of buyers and sellers and the availability of information. The CCSD should maintain planning and ownership data useful for those interested in the lot merger, conservation easement and transfer of development credit programs. The CCSD should further the development reduction goal by providing information and promoting transactions under the voluntary development reduction measures. Absentee owners in particular may represent a source of potential lot retirement under a development reduction program. Some absentee owners may be interested in the conservation easement program, particularly if they own lots of marginal value. Monitoring on a lot-by-lot basis may reveal opportunities to sell absentee-owner parcels to owners of adjacent developed lots. Such owners may, in turn, merge such lots or convey a conservation easement to the CCSD that effectively retires the acquired lot. As with the financial incentives, the CCSD should be in a good position to provide these "information" incentives based on the databases developed for its own marketing and property acquisition efforts.

III. DEVELOPMENT CONSTRAINTS/ATTRITION

The economic study prepared by Hausrath Economics Group in 1996, concluded that some parcels will never develop because of physical or ownership constraints. In Cambria, some parcels are subject to serious physical constraints, most notably steep, unstable slopes. Some lots have slopes in excess of 40% with no feasible



building area. Though construction techniques can overcome physical difficulties, in some cases, the cost may be prohibitive. Other parcels were never built on by the original owner, passed on through by the owner's estates, and now are held by individuals or trusts with little interest in development or inclination to sell. In some cases, parcel title is not clear, thereby limiting the parcel's sale potential. For these reasons, these lots provide opportunities for voluntary retirement or acquisition.

Previous studies commissioned by San Luis Obispo County have presumed that 10 percent of Cambria's buildout potential will never be developed. Although by relying on development constraints as a component contributing to a Buildout Reduction Strategy may have merit, the reasoning for applying a percentage can be somewhat arbitrary and should not be considered when identifying calculations for development reduction.

A. Expansion and Enforcement of Fire Code Provisions

Although there has been no large scale fire in Cambria since the 1800's, several contributing factors confirm that a high fire danger exists throughout the community. When considering the fire environment, fire fighters and experts recognize three components that are clearly applicable to Cambria: weather, topography, and fuel. These components affect the likelihood of a fire starting, the speed and direction at which a wildfire will travel, the intensity at which a wildfire burns and the ability to control and extinguish a wildfire. The following elaborates on each component:

- Weather. Dry, hot and windy weather increases the likelihood of a major wildfire. These conditions make ignition easier, help fuels burn more rapidly and increase fire intensity. High wind speeds, in particular, can transform a small, easily controllable fire into a catastrophic event in a matter of minutes.
- Topography. Of topographic features, steepness of slope most influences fire behavior. As the steepness of slope increases, the fire spreads more quickly. Other important topographic features include aspect (south and southwest slopes usually have more fires) and steep, narrow drainage (chimneys), which can significantly increase the rate of firespread.
- Fuel. Fuel is required for any fire to burn. In regard to wildfire, fuels almost always consist of living vegetation (trees, shrubs, grass and wildflowers) and dead plant materials (dead trees, dried grass, fallen branches, pine needles, etc.) Houses, when involved with a wildfire, can become a source of fuel. The amount, size, moisture content, arrangement and other fuel characteristics influence the ease of ignition, rate of fire spread, length of flames produced and other fire behavior.
- The Human Factor. When people are living in high-hazard fire environments, the human-built environment becomes an important factor in predicting the loss of life and property. Untreated wood



shake and shingle roofs, narrow roads, limited access, lack of fire-wise landscaping, inadequate water supplies and poorly planned subdivisions are examples of increased risk to people living with the threat of wildfire.

The public safety issue facing Cambria now and into the future is the threat of fire, both in local neighborhoods as well as throughout the community. The following details the issues and challenges:

- Topography/Chimney. Part of the charm for area residents is topographic diversity of hillsides and canyons in most neighborhoods. This condition also creates significant dangers relating to fire safety. Steepness, buildup of fuel, accessibility and proximity of residences signify the danger evident in most neighborhoods. The reference to “chimney” effect, due to steepness, also emphasizes how rapidly a fire event can spread with little or no obstruction in its path. The threat of chimney events in Cambria is most consistent for south and southwest facing slopes. These areas tend to be dryer, especially in the mid-afternoon, on-shore wind condition, which can result in a challenging condition for fire fighters. Chimney conditions are especially evident in Park Hill, and Lodge Hill.
- Wildland Interface. Neighborhoods throughout Cambria interface directly with wildland areas, creating safety challenges. The condition goes hand-in-hand with accessibility, topography and the amount of fuel at the interface. Prominent areas of concern include Happy Hill, Lodge Hill and Pine Knolls. Dedicated open space areas, which meander in proximity to neighborhoods are also of concern. These areas include Strawberry Canyon, Fern Canyon and the East-West Ranch.
- Pitch Canker. Pitch Canker, which has been affecting Monterey Pines in Cambria, is a disease of conifers that causes dieback of individual branches, initially infecting the branch tips, causing needle wilt and tip death. Multiple branch tip infections result in noticeable dieback in the tree crown. Currently, there is no effective control of Pitch Canker. If other trees in the area have Pitch Canker, there is little that can be done. The dead limbs and trees can add to an area’s fire danger hazard.
- Narrow Roads/Access. Accessibility is a key concern in Cambria with regard to responses to a fire event. There are examples throughout the community of narrow roads, substandard accessibility, and related problems, which affect response time and ability to mobilize fire-fighting apparatus.

Section 902 of the California Fire Code provides specification for roadway width dimensions. Fire apparatus access roads are to have an unobstructed width of not less than 20 feet and an unobstructed vertical clearance of not less than 13 feet, 6 inches. Examples of



roads with widths of 16 feet, 14 feet and even 12 feet are evident throughout Cambria. Many of these narrow segments have allowable on street parking, creating a greater safety hazard. Vertical clearance problems are also a problem where the tree canopy can limit access of an apparatus. This is particularly evident in Lodge Hill. Other examples of access limitations occur in Pine Knolls, which has two entry/exit locations, both of which have steep and narrow grades. Park Hill has one entry/exit location and narrow road widths as well.

- Overgrowth Onto Roads. The noted canopy problems in the Lodge Hill neighborhood is an example of the vegetation density and accessibility concern. Other areas of the community also have vegetation overgrowth into the road right-of-way, which contributes to the safety hazard.
- Power Lines. Overhead utilities occur throughout the community and present a hazard. Many lines criss-cross, have vegetation overgrowth onto the lines and some lines occur in the rear area of residences at the wildland interface. Should a line go down in these areas, the potential for a fire event is of concern. Most lines occur along local roadways, with areas where lines are precariously positioned. A great concern for the fire department is the downing of lines onto the roadways, creating a fire and access hazard.
- Response Times. Typical response time for the Cambria Fire Department is three to five minutes in most of the community. This is further augmented by the previously mentioned automatic aid agreement with CDF/County Fire. Response times can be compromised when access is constrained by parked cars and roadway deficiencies. An example of constraint is the conditions in delivery zones in both the East and West Villages. Delivery trucks are often parked on the main arterials, constricting traffic and causing an obstruction in the event of an emergency. Another response time challenge can occur in the Marine Terrace – Lodge Hill area due to the lack of accessibility across the West Ranch. The CCSD is in the process of resolving this problem by implementing an emergency access road to connect the neighborhood.
- Water Availability. Fire flow and locations of fire hydrants have historically been deficient in areas of the community. The East and West Villages have had particular deficiencies and other examples occur in the neighborhoods. The CCSD is processing an upgrade to the Pine Knolls water tank, which will improve availability, fire flow and pressure. In addition, a large diameter hose truck was recommended to the Fire Department during development of the water master plan as a cost effective means for reaching areas where hydrants are spread too far apart. The CCSD Board also concurred that the hose truck should be a level 1 priority project.



- Defensible Space/Densities and Setbacks. Examples occur throughout the community where residences are constructed in close proximity and utilize wood materials. Over 40 “Pole” houses occur in areas of considerable slope and limited access. Several examples of dense cover and dead vegetation in proximity to residences are evident.

1. Fire Protection Authority

The CCSD is legally authorized to enforce the powers, functions and duties of a fire protection district under Health and Safety Code Section 13800 et. seq. Health and Safety Code Section 13869 authorizes adoption of a Fire Prevention Code and delegation of enforcement to the Fire Chief. The adoption and delegation was done by CCSD Code 6.04.010 et. seq.

The CCSD has the authority to impose building standards relating to fire and panic safety that are more stringent than those building standards adopted by the State Fire Marshal and contained in the California Building Standards Code. (Health and Safety Code Sections 13869.7; 17958.7; 18941.5) The CCSD has already adopted more stringent standards, for certain purposes, as set forth in CCSD Code Section 6.04.040.

2. Urban Wildland Interface Code

In addition, the CCSD has adopted the Urban Wildland Interface Code (“UWIC”) (Cambria CSD Code, Section 6.04.0404(P).) The UWIC authorizes the CCSD Board to “declare the urban wildland interface areas within the jurisdiction” based on findings of fact set forth in the UWIC [dealing with climactic, topographical and geographical conditions unique to the CCSD]. (UWIC), Section 302.1.) These urban-wildland interface areas are to be recorded on maps. (UWIC, Section 302.2.)

The map under the UWIC could include determinations as to what areas within the CCSD would require additional fire protection standards based on the potential for the “chimney effect.” (See UWIC, Appendix “E” (providing, among other factual considerations to be used, the following: elevation and ranges of elevation, location of ridges, drainages and escarpments, percent of grade (slope), location of roads, bridges and railroads, and other topographical features, such as aspect exposure).)

One example of fire protection measures is the UWIC’s required “defensible space” provisions. “Defensible space” is defined by the UWIC as “an area either natural or man-made, where material capable of allowing a fire to spread unchecked has been treated, cleared or modified to slow the rate and intensity of an advancing wildfire and to create an area for fire suppression operations to occur.” (UWIC, Section 202.) These required defensible spaces range from 30 to 100 feet from structures, depending on the fire hazard rating of the area. (UWIC, Section 603.) Vegetation management practices could affect the amount



of required defensive space in that how much defensive space is required is based on the fire hazard rating, which is – at least in part – based on fuel types such as vegetation. By referencing the limitations imposed by defensive space requirements, a legitimate fire protection regulation, the CCSD could analyze the ability of certain areas within the CCSD to develop.

3. State Fire Code

Similarly, the CCSD has adopted the State Fire Code, with several amendments. One of the provisions within the Fire Code is a requirement for not less than 20 feet of unobstructed width of public rights of way. (Fire Code, Section 902.2.2.1.). Since this requirement is for “unobstructed” access, the requirement is even greater in width to the extent a particular road allows for parking of vehicles on that street. So, by the County imposing “no-parking” restrictions (which would require posting of signage), the number of roads that meet the accessibility requirements would increase. Again, this access requirement is a legitimate fire safety regulation that could legally be enforced by the CCSD. As part of that enforcement, the CCSD could prepare a map that delineates those areas within the CCSD that do or do not provide the required access. This map could be referenced by the CCSD in order to determine what areas within the CCSD are constrained by development by this access requirement.

It is noted that a significant portion (perhaps as much as 90%-95%) of the CCSD would not be compliant with the access requirement, when accounting for the increased width made necessary by those roads on which on-street parking is permitted. Thus, while the CCSD might legally be authorized to rely on this regulation, the CCSD might have legitimate concerns about the policy implications of applying this regulation. In addition, the practical reality is that, since the CCSD is not the land-use authority with general authority over new development, such determinations would be under the authority of the County. Obviously, the CCCD is authorized by law and required to approve the fire-related aspects of new development projects. Thus, the County would legally be required to impose the CCSD’s fire regulations on new projects. If, for whatever reason, those requirements were not imposed, the CCSD could take action to require the imposition and enforcement of those requirements.

4. Cambria Fire Risk

In addition, under Government Code section 51175 et seq., the CCSD is authorized to designate fire risk zones within the CCSD. The area is to be based on recommendations from the State Director of Forestry and Fire Protection. Very high fire hazard severity zones are based on fuel loading, slope, fire weather, and other relevant factors, which means that if enough vegetation is removed, it would be possible the very high fire hazard rating could be removed. Land within a very high fire hazard



severity zone is subject to certain development and maintenance constraints, such as defensible space of at least 30 feet on each side of the property line, firebreaks, permitted location of trees relative to structures, etc. (Government Code, Section 51182). The CCSD has a copy of the State's map designating very high fire hazard severity zones within the CCSD, and has, because of local climactic conditions, revised that map. As with the maps referenced above, this map could be used by the CCSD to show areas of land within the CCSD that contain such development constraints.

5. Potential Expansion of Fire Code Requirements (Building Restrictions)

The CCSD could expand the Fire Code requirements based on local climatic, topographical or geological conditions. Any changes to the Fire Code need to first be adopted by the CCSD and then the changes need to be approved by the County Board of supervisors. Under this arrangement, the County authorizes the CCSD to enforce the Fire Code requirements. Any expansion of the Fire Code requirements could only be done if there is a justification based on local fire protection needs and not for secondary purposes such as lot reduction. For example, taking into account those limitations, the CCSD could consider requiring fire sprinklers in all new buildings and remodels, without the exceptions provided under the CCSD's amended Section 1003.2.2 (Automatic Fire Extinguishing Systems).

The CCSD has the authority to enforce existing fire protection requirements and to exhibit maps that outline such policies and requirements. Such information should be presented as information that addresses existing Fire Code requirements and the CCSD's corresponding authority. Such information should not be presented as a tool to identify particular lots for any purpose such as lot consolidation, retirement, acquisition, etc. Such mapping should be presented or developed only in accordance with what is permitted under the fire protection laws and codes referenced above.

IV. LAND USE REGULATIONS

Due to the County's land use authority and regulatory powers, a key provision of the Buildout Reduction Program is amending County policies and programs to better meet the community's goals. The primary regulations involve the North Coast Community Plan Update and Lot Merger Ordinance. This, coupled with full implementation of the Cambria Design Plan, will serve as a significant step in meeting the objectives.

A. 2005 North Coast Community Plan Update

As stated in Chapter 3 of this report, the County of San Luis Obispo is currently conducting an update to the Cambria and San Simeon Acres Community Plans of the North Coast Community Plan. This process presents the CCSD with the



timely opportunity to seek greater support of land use policies and programs which further the goals of buildout reduction. It is of particular interest that the May 2005 public review Draft Community Plan identifies ultimate buildout in Cambria at 6,130 single-family residents, which is a substantial reduction when compared to the earlier 2000 Community Plan buildout projection of 11,611.

This update is critical to the success of Cambria buildout reduction goals. It is recommended that the CCSD proceed with the following actions in order to assure the County's maximum buildout baseline recognizes the overall goal for reducing build-out potential in Cambria and thus reduces the emphasis for certain strategy provisions that can be considered more assertive and, at times, more expensive:

1. The CCSD will need to actively pursue support for the reduced buildout calculations and associated policies related to reducing buildout through the County of San Luis Obispo's public review and hearing process for the Area Community Update.
2. The CCSD should encourage land use category revisions where appropriate and reasonable to further reduce buildout potential. For example, revising a multi-family area to a single-family use further reduces development potential. Proposed change number 10 on Figure 8 of the May 2005 draft land use map provides an example. In addition to the area covered by revision 10, other areas built with single-family residences within multi-family use areas should be considered for rezoning.
3. The CCSD will need to request further information and validation of the County's methodology, which supports the 6,130 buildout projection.
4. The Draft Community Plan will need to incorporate goals and objectives which are more specific to buildout reduction in Cambria. The CCSD will need to cite and emphasize the provisions of the Coastal Commission's Periodic Review Final Recommendations contained in the 2001 evaluation (Recommendations 2.13 and 2.16), as they pertain to furthering buildout reduction.
5. The Transfer and Development Credits Program, referenced in the Land Use and Combining Designations chapters of the Community Plan, refers to expansion of the TDC Program to include more areas of the community. This program should be supported and a specific reference to the number lots to be considered in this program should be presented. The CCSD Board of Directors should identify a yearly and 20-year horizon goal under this program.
6. As stated in Subsection IV, B, Lot Consideration/Merger, the Community Plan should request policy revisions in order to rectify the problem of lot consolidation versus lot merger. This will bring the County further into compliance with the Subdivision Map Act and



result in greater consistency between buildout policies and with the mechanism for reducing buildout.

7. The Community Plan's reference to the establishment of an Open Space CCSD in order to begin purchasing small and substandard lots should be implemented by the CCSD. Chapter 6 of this report references financial programming to further this opportunity.
8. The CCSD should support the County policy provision regarding lot consolidation/merger for Monterey Pine Forest protection. It should be requested that the County proceed with a review of procedures and suggested changes that connect specifically with the buildout reduction policies.
9. The County refers to the concept of a zero-net increase in the reference to New Residential Land Divisions. This is an important feature in the Community Plan calculations and warrants further review and understanding of the application. The Community Plan will need to provide a clear understanding of implementation in order to be consistent with buildout projections.
10. The CCSD should acknowledge and support the Draft EIR alternatives analysis which references a Decreased Development Plan Alternative, which would add a maximum of 650 additional dwelling units. This alternative is consistent with the CCSD Board's objective of 4,650 single-family residential connections in Cambria.

Although support of the referenced provisions by the County is of great importance to the buildout reduction strategy, there is continued uncertainty whether the County projections will be further modified through the continuation of the Community Plan Update review, approval and adoption. Thus, the importance of supporting the incorporation of buildout reduction provisions into the Community Plan Update should be the highest and most immediate priority.

B. Lot Consolidation/Merger

During the late 1920's, very small lots were laid out throughout Cambria with little regard to modern standards associated with topographic, geologic, environmental, and other constraints. Since then, home sizes have also evolved into much larger residences than the small vacation cabins that were most likely anticipated. For example, many of the original Lodge Hill subdivision lots are about 1,750 square feet in area (about 25 feet wide and 70 feet deep). Today, homes of 2,500 to well over 3,500 square feet are commonly being built over two, three, or even five of the original subdivision lots.

To discourage high-density residential development, the County implemented a lot consolidation ordinance in 1966 that "consolidated" lots under common ownership that were contiguous. The ordinance set as a minimum, two consolidated lots as being one single building site. In order to qualify for a



building permit, any lot that resulted from a post-1966 subdivision of consolidated property is required to be at least 3,500 square feet in area, and have at least 40 feet of frontage. The smaller lots (i.e., 1,750 square-foot) may still qualify as a building site if they were separately owned and not contiguous with the same owner's other properties prior to the County's adoption of the 1966 ordinance.

Analyzing potential development within the small lot subdivisions is complicated and was one of the factors motivating the CCSD to develop a GIS-based development scenario model. As a further complication towards administering the 1966 ordinance conditions, the County assessor records only go back to 1975. Therefore, detailed title reports and analyses are required not only on the lot less than 3,500 square feet seeking a building permit, but also on the adjoining lots to assess how and when the lot was created in relationship to the 1966 time frame.

Past practice by the County requires considerable research on the title history for those properties seeking a building permit that are under the 3,500 square foot minimum. If property less than 3,500 square feet can be proven to have existed as an independent building site prior to 1966, and not having been the result of a subdivision from a post-1966 subdivision of a consolidated property, the County would normally allow the building permit processing to proceed. CCSD has relied upon the County prior to placing a lot on their water wait-list. Therefore, lots already on CCSD's water wait-list were deemed as buildable regardless of their square footage.

In addition to the unique and complex analysis that results from evaluating lot consolidations and subsequent subdivisions, the County has also set a past practice of not enforcing merger of lots as part of its permit processing. In many cases, structures may have been constructed across property lines and the underlying lot lines were never formally eliminated via a Subdivision Map Act lot merger. This leads to further speculation and uncertainty over potential build-out due to concerns over existing homes being demolished and replaced with multiple housing units over the underlying lot lines. However, the likelihood of such a practice and percentage of homes being demolished in the future may be relatively low. From discussions with County planners, it is believed the most likely area where future demolitions and subdivision may be sought is along the ocean front lots.

More can be accomplished through the County's Community Plan process to address the long-term buildout concerns. For example, a program should be initiated to encourage lot consolidation. Although with that being said, a continued problem is that the County policy allowing "lot consolidation" versus requiring "lot mergers" continues to cause confusion on potential buildout values. The Subdivision Map Act recognizes "merger" and does not recognize the current "consolidation" term used in County policy documents and, more specifically, in the Coastal Zone Land Use Ordinance. The practice of allowing homes to be built across property lines without requiring a merger leads to inflated housing unit numbers when one house is built across multiple lots. A County policy requiring lots to be merged, as opposed to consolidated, would



be in compliance with the Subdivision Map Act, and also minimizes the amount of potential intensification.

Based on the unique fire hazards posed in Cambria and as discussed in this section, the CCSD intends to enforce Uniform Building Code requirements requiring fire-rated walls to be located within three feet of property lines. This enforcement, in coordination with County development reviews, should encourage future lot mergers as opposed to the current practice of allowing lot consolidations.

C. Cambria Design Plan

The Cambria Design Plan will assist in guiding new development in Cambria. This plan may significantly reduce the potential size of new residences in Cambria. A number of mitigation measures under the Cambria Design Plan will be available to owners of residential lots that would permit an applicant to increase the allowable area of a residence. This program should be expanded to include lot retirement as a means of obtaining credits to expand the size of a residence.

D. CCSD Water Code 350 Moratorium

On November 15, 2001, the CCSD Board declared a Water Code 350 emergency based on inadequate supply and inadequate fire-fighting capabilities. This action, with the exception of certain developments that were in the process of receiving approvals (i.e., "pipeline" projects), established a moratorium against additional water connections.

V. PROPERTY ACQUISITION

By directly acquiring lots, the County or CCSD can take an active role in reducing development potential. It can directly control the rates and level of development reduction rather than relying on the voluntary actions of private owners. Cost of acquisitions, however, would be considerably greater than any of the approaches to density reduction discussed above, since properties would have to be purchased at market values. Acquisitions, therefore, may be implemented as a secondary approach in the event that the voluntary measures do not produce enough reduction in development.

As the sponsor of a property acquisition program at the levels contemplated by the Program, the CCSD would become a major player in the local real estate market. The need to rely on locally-generated funds, combined with the inherent risks of real estate markets, demands that such a program be carefully considered and designed prior to implementation.

The property acquisition program should have the following goals:

- Achieve the level of development reduction called for by the Plan's preferred alternative;



- Minimize total net costs over the life of the program; and
- Sunset the program once it reaches the desired development reduction goal.

To effectively achieve these goals, a program should operate under the following guidelines:

- The program should have the flexibility either to acquire conservation easements, leaving the parcel as permanent open space in private ownership, or to acquire fee title to the parcel outright, resulting in publicly-owned open space;
- Acquisitions should target the lowest-valued development rights available on the market; and
- The program should be able to merge and resell parcels if there is market demand, after attaching a conservation easement, if appropriate, with revenue dedicated to additional development reduction.

The program manager must have the ability to act quickly to take advantage of market opportunities. The real estate acquisition process can be cumbersome, which could restrict the efficient use of program revenue for development reduction. Consequently, to cost-effectively achieve program goals under the guidelines listed, the CCSD should seriously consider contracting with a private for-profit or nonprofit entity. In return, the CCSD will have one organization to hold clearly accountable for program results. Sufficient contract oversight by the CCSD may be necessary to ensure that the contractor is minimizing purchase, transaction, and administrative costs, and maximizing revenue from resales. In addition to the “one-time” costs related to land purchases, the property acquisition program would also result in recurring costs related to land stewardship (the most significant component of which would be annual weed abatement).

A rationale for pursuing the acquisition/retirement of lots could be found under CCSD’s authority to acquire real property in connection with its park and recreation activities. Under such authority, the CCSD could implement the accompanying power to acquire real property necessary for such activities including property to be set aside for open space and related recreational purposes.

An alternative authority for raising the funds through water rates, fees and charges has been considered by the CCSD. This concept is based on the mitigation measures which will likely be imposed in connection with the EIR for the desalination plant. Such mitigation may involve the acquisition of properties to reduce the number of potential properties being developed and thereby needing water service.

An alternative position could be that a mitigation measure for acquiring properties to reduce growth should reside with another agency that has land use authority to control growth. Under CEQA law, certain findings must be made in order to approve a project, for which an EIR has been certified, which identifies one or more significant environmental effects of the project. One of the findings that may be made is that



changes to the project which would avoid the significant environmental effect (acquisition of properties to reduce buildout) are within the responsibility and jurisdiction of another public agency (with land use/growth control authority) and not the agency (CCSD) making the finding, and that such changes have been adopted by such other agency or can and should be adopted by such other agency.



Chapter 6.0 FINANCIAL FACTORS



6.0 FINANCIAL FACTORS

The following describes various funding scenarios that were considered during development of the Buildout Reduction Program as well as details of the financial model.

OVERVIEW OF FUNDING SCENARIOS

Various means for acquiring property rights and related funding sources are summarized as follows:

- Grants and outside funding sources;
- Land conservancies;
- Donations from private individuals and corporations;
- Habitat mitigation banking;
- Lot Retirements;
- Connection fees;
- Property assessments; and
- Rate surcharges.

In addition, property rights can be acquired via a fee purchase acquisition as well as the use of conservation easements. In the latter, the property rights are essentially retired from future development while land remains under private ownership. The financial model was developed with the flexibility to apply various assumptions and combinations of revenue sources to assess the overall economic impacts.

OVERVIEW OF THE FINANCIAL MODEL

[Work is in progress on this section. Information will be presented at an upcoming CCSD Board of Directors meeting.]



Chapter 7.0 IMPLEMENTATION



7.0 IMPLEMENTATION

This chapter incorporates, as possible mitigation measures, the various options set forth in the Buildout Reduction Strategy/Toolbox (Chapter 5) of this report. While Chapter 5 presents a range of options for the CCSD to further the reduction goals, it is equally important to proceed with the implementation program in order to incorporate the provisions into the Program EIR for the Water Master Plan.

The California Environmental Quality Act, ("CEQA") requires that measures to mitigate or avoid significant effects on the environment are fully enforceable through permit conditions, agreements, or other measures. As discussed in Chapter 2.0 of this report, the CCSD has developed an update to the Water Master Plan, which is to include an Environmental Impact Report (EIR) in order to comply with CEQA. The Buildout Reduction Program is intended to identify feasible mitigation to mitigate the potentially significant growth inducing impacts of the Water Master Plan. The EIR will identify the CCSD's legal authority to impose mitigation to potentially significant growth inducing impacts to:

- CAP the maximum number of potential water service connections within the CCSD service area; and
- Allocate the new water services in a manner to minimize the adverse growth inducing impacts.

CEQA also requires adoption of a reporting or monitoring program for these mitigation measures placed on a project to mitigate or avoid adverse effects on the environment. The reporting or monitoring program must be designed to ensure compliance during the project implementation.

An effective monitoring program should contain the following elements:

- The mitigation measures are recorded with the action and procedure necessary to ensure compliance. In some instances, one action may be used to verify implementation of several mitigation measures.
- A procedure for compliance and verification has been outlined for each action necessary. This procedure designates who will take action, what action will be taken and when, and to whom and when compliance will be reported.
- The program contains a separate Mitigation Monitoring and Compliance Record for each action. On each of these record sheets, the pertinent actions and dates will be logged, and copies of permits, correspondence or other relevant data will be attached. Copies of the records will be submitted to CCSD.
- The program has been designed to be flexible. As monitoring progresses, changes to compliance procedures may be necessary based upon recommendations by those responsible for the program. As changes are



made, new monitoring compliance procedures and records will be developed and incorporated into the program.

MITIGATION MONITORING AND COMPLIANCE PROGRAM (MMCP)

Mitigation Measure: Current CCSD Programs

CCSD Water and Sewer Allocation Ordinance. The CCSD shall continue, in its current state and with no further amendments, the utilization of Water and Sewer Allocation Ordinance (Chapter 8.04 of the CCSD Code) for extending water services to new customers.

Water Meter Transfers. The CCSD shall continue implementing this program so as to encourage retirement of lots that would be subject to development.

CCSD Code Section 8.04.040(G). The CCSD shall continue to apply Code Section 8.04.040(G), prohibiting extension of service to those properties that contain legal restrictions against development. The CCSD shall notify the County that there is a restriction on the number of connections that the CCSD will honor on the properties and that no additional connections will be permitted. A determination of which parcels are subject to the restrictions shall also be made at the time the CCSD is required to act on an application for connection, at which time the reference will be made to application of CCSD Code Section 8.04.040(G). The CCSD shall also enforce those agreements to which it is a party in the event the other party breaches such agreement.

CCSD staff is responsible for implementing the two ordinances. The CCSD Board of Directors ultimately is responsible for adoption, and amendment repeal of ordinances such as these.

Mitigation Measure: Voluntary Density Reduction

Transfer of Development Credits. The CCSD shall encourage existing County ordinance permitting applicants to transfer development credits from one lot to another to be expanded to provide incentives for lot owners to transfer development credits from one lot to another in exchange for expansion of a residence beyond the otherwise permissible square footage (or other development incentive) and retirement of the lot from which development credits were transferred.

Lot Mergers. The CCSD shall work with the County to undertake steps to streamline the merger process. Information, advice and assistance in preparing lot merger applications will be promoted by the CCSD and available at the CCSD offices. Other streamline efforts shall include:

- Maintain and easily make available Assessor's parcel maps for attachment to the application, rather than forcing the property owner to make a special trip to the Assessor's Office.
- Promote mergers through community bulletins, notices enclosed with the annual property tax statement, and other promotional activities.



- Have the County delegate to the CCSD the authority to assist with merger applications and/or assist in the application process in Cambria, rather than forcing the property owners to go to the County's offices in San Luis Obispo.
- Implement a letter writing campaign, supported by the CCSD, to affected property owners.

Conservation Easements. The CCSD shall be a financial participant in the acquisition of conservation easements by working cooperatively with land conservation organizations.

Lot Development Rights Acquisition Program. The CCSD shall actively assist land conservation organizations by providing funds to be matched with other governmental contributions and private donations to accelerate the rate of lot acquisitions in Cambria and undertake the maintenance obligations of such lots. The CCSD should seek potential sources of funding available to the CCSD for active participation in a lot development rights acquisition program, including the CCSD's Water Conservation Fund, grants from the Federal and State governments, private land conservation organization funds, and Mello Roos CCSD proceeds.

Financial Incentives. CCSD shall increase the current rate of voluntary density reduction by absorbing processing costs of TDCs, mergers, or easements to make these options more attractive.

The CCSD shall also maintain planning and ownership data useful for those interested in the lot merger, conservation easement and transfer of development credit programs. The CCSD shall further the development reduction goal by providing information and promoting transactions under the voluntary development reduction measures. The CCSD shall monitor real property data on a lot-by-lot basis in order to reveal opportunities to sell, including to absentee-owner, parcels to owners of adjacent developed lots.

CCSD staff will work directly with County staff to encourage the expansion of Development Transfer Credit opportunities and lot merger policies. CCSD staff will also facilitate acquisition of property interests, subject to CCSD Board approval. CCSD staff will also implement the creation of the identified financial incentives.

Mitigation Measure: Development Constraints/Attrition

Expansion and Enforcement of the Fire Code Provisions/ Fire Protection Authority/ State Fire Code. CCSD shall prepare a map that delineates those areas within the CCSD that do or do not provide the required Fire Code access. This map would be referenced by the CCSD in order to determine what areas within the CCSD are constrained by development by this access requirement.

Urban Wildland Interface Code. The CCSD shall reference the development limitations imposed by defensive space requirements of the Urban Wildland Interface Code, a legitimate fire protection regulation, in order to analyze the ability of certain areas within the CCSD to develop.



Cambria Fire Risk Zones. The CCSD shall reference the CCSD's Fire Hazard Severity Zone Map in order to show areas of land within the CCSD that contain such development constraints.

Potential Expansion of Fire Code Requirements (Building Restrictions). The CCSD shall consider adopting amendments to the Fire Code, including a requirement for fire sprinklers in all new buildings and remodels, without the exceptions provided under the CCSD's amended Section 1003.2.2 (Automatic Fire Extinguishing Systems).

Existing fire protection requirements, including exhibit maps that outline such policies and requirements will be presented by the CCSD as information that addresses existing fire code requirements and the CCSD's corresponding authority.

CCSD staff will bring forward potential amendments to various fire safety codes, for consideration by the CCSD Board of Directors. CCSD staff will prepare and provide maps depicting the constraints placed on development by fire safety codes.

Mitigation Measure: Land Use Regulations

North Coast Community Plan Update. It is recommended that the CCSD proceed as follows in order to further the buildout reduction goal in conjunction with the review and approval process of the County's Draft May 2005 Cambria Community Plan.

- The CCSD shall actively pursue support for the reduced buildout calculations and associated policies related to reducing buildout through the County of San Luis Obispo's public review and hearing process.
- The CCSD shall request further details from the County explaining the County's methodology and data used to develop the 6,130 ultimate buildout projection within the draft Community Plan report. Information to be pursued shall include a breakdown by housing unit type (e.g., multi-family, mixed-use multi-family, and single family residential), and correlation factors used to compare theoretical absorption capacity values to actual development experience.
- CCSD shall request further information from the County and SLOCOG associated with affordable housing, related jobs/housing balance calculations, proximity to job centers and transportation systems, and associated commuting patterns. The County's unincorporated affordable housing goal shall be compared to specific resource availabilities within Cambria to further develop a specific Cambria-area affordable housing goal. The specific Cambria-area goal for affordable housing shall be further compared to land use categories and related standards within the 2005 Cambria Community Plan.
- The CCSD shall request further protection and hardening of the boundary between the existing riparian habitat along Santa Rosa Creek and potential development. Existing provisions within the May 2005 Community Plan and



Coastal Zone Land Use Ordinance contains exceptions that may allow for the removal of such habitat.

- The CCSD shall request that the Draft Community Plan incorporates goals and objectives, which are more specific to build out reduction in Cambria. The CCSD will need to cite and emphasize the provisions of the Coastal Commission's Periodic Review Final Recommendations contained in the 2001 evaluation (E.g., Recommendation 2.16).
- The Transfer and Development Credits Program, referenced in the Land Use and Combining Designations chapters of the Community Plan, refers to expansion of the TDC Program to include more areas of the community. This shall be supported and a specific reference to the number lots to be considered in this program should be presented. The CCSD Board of Directors shall identify a yearly and 20-year horizon goal under this program.
- As stated in Subsection IV, B, Lot Consideration/Merger, the CCSD shall request Community Plan policy revisions in order to rectify the problem of lot consolidation versus lot merger. This will bring the County further into compliance with the Subdivision Map Act and result in greater consistency between buildout policies and with the mechanism for reducing buildout.
- The Community Plan's reference to the establishment of an Open Space District in order to begin purchasing small and substandard lots shall be implemented by the CCSD.
- The CCSD shall support the County policy provision regarding lot consolidation/merger for Monterey Pine Forest protection. It should be requested that the County proceed with a review of procedures and suggested changes that connect specifically with the buildout reduction policies.
- The County refers to the concept of a zero-net increase in the reference to New Residential Land Divisions. This is an important feature in the Community Plan calculations and warrants further review and understanding of the application. The CCSD shall request that the Community Plan provide a clear understanding of implementation in order to be consistent with buildout projections.
- The CCSD shall acknowledge and support the Draft EIR alternatives analysis which references a Decreased Development Plan Alternative, which is consistent with the CCSD Board's objective of 4,650 residential housing units in Cambria. The CCSD and County shall continue to meet and discuss a specific number of affordable housing units above this goal that meet specific affordability requirements to ensure long-term affordability and a specific goal.

Lot Consolidation/Merger. This CCSD shall coordinate with the County in the County's implementation of its lot consolidation ordinance, in compliance with the



Subdivision Map Act, so as to minimize the amount of potential buildout intensification.

Cambria Design Plan. The CCSD shall encourage the mitigation measures under the Cambria Design Plan to be expanded to include lot retirement as a means of obtaining credits to expand the size of a residence.

CCSD staff will consult with County Planning Department regarding North Coast Community Plan Update, Lot consolidation ordinance and the Cambria Design Plan.

Mitigation Measure: Financial Factors

[Work is in progress on this section. Information will be presented at an upcoming CCSD Board of Directors meeting.]