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CALIFORNIA
COASTAL COMMISSION
CENTRAL COAST AREA

Th 19a ✓

Re: May 11 Agenda Item 19.a.
LCP Amendment No. LCP-3-SLO-16-0014
Statement From the Monarch Grove Homeowners
Association In Favor of the Executive Director's
Determination that the Amendment is Minor

Monarch Grove Homeowners Association
April 30, 2016

To: The Commissioners of the California Coastal Commission:

Dear Commissioners:

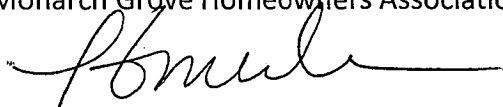
As stated in the Coastal Commission Executive Director's report of April 22, 2016, Monarch Grove is a subdivision of 83 single family homes which is fully built out. It is currently served by a small package sewage treatment plant owned by the Homeowners Association. The plant has been in existence for approximately 17 years.

On January 28, 2016, at a special meeting of the Board of Directors of the Monarch Grove Homeowners Association, a secret mail-in ballot having been circulated to all homeowners seeking confirmation that the homeowners (as they have voted in the past) desire to join the Los Osos Wastewater Treatment Plant rather than to continue to operate our own package plant, a count of the votes was made and 100% of those homeowners voting in the election voted for obtaining our sewage service from the LOWWTP.

The Board of Directors request that the Commissioners accept the determination of the Executive Director that San Luis Obispo County's submitted Los Osos Urban Services Line Amendment is minor. We believe that including our subdivision in the USL for the LOWWTP will be a step in the direction of improving the environmental security of our community, and will secure the benefits of a modern sewage treatment system for our homeowners.

Respectfully Submitted

Monarch Grove Homeowners Association Board of Directors



Thomas G. Mullen
Board President

236 Marianela Lane
Los Osos, CA 93402

(805)528-8256

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May Agenda, item 19.a
San Luis Obispo County LCP Amendment
No. LCP-3-SLO-16-0014-1
(Urban Services Line Adjustment, Los Osos)
SUPPORT

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MAY 09 2016

May 5, 2016

California Coastal Commission
725 Front St., Suite 300
Santa Cruz, CA 95060-4508

CALIFORNIA
COASTAL COMMISSION
CENTRAL COAST AREA

Dear Commission Members:

I'm writing in support of the proposed LCP amendment. As a resident of the Monarch Grove housing development, I see this opportunity to join a local wastewater program as critical. Our wastewater plant has been somewhat problematic from its inception. While homeowners are committed to operating a compliant wastewater plant, the challenges for such a small neighborhood are daunting.

- We operating tiny plant in a small community, and the availability of expertise for maintaining and repairing the plant is limited. We are dependent upon a private operator, and in a small community such as ours that can be problematic.
- The operation of the plant requires that we have someone who is willing to accept our sludge. We are far from assured that our current arrangement can be counted on in the future.
- The treated water is used by the small golf course adjacent to our neighborhood, but I'm unclear what would happen if the 9-hole course were to cease operation.

As a general rule, complexity to such an important process as water treatment is not desirable. I hope you'll help our community and my neighborhood simplify the wastewater process for Los Osos.

Sincerely



Martin Bragg
2310 Del Norte Street
Los Osos, CA 93402
805-305-3004
mbragg@calpoly.edu

CALIFORNIA COASTAL COMMISSION

CENTRAL COAST DISTRICT OFFICE
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W19a

Prepared April 22, 2016 (for May 11, 2016 Hearing)

To: Commissioners and Interested Persons

From: Susan Craig, Central Coast District Manager
Daniel Robinson, Coastal Planner

Subject: San Luis Obispo County LCP Amendment Number LCP-3-SLO-16-0014-1
(Urban Services Line Adjustment, Monarch Grove Neighborhood, Los Osos).

Proposed Amendment

San Luis Obispo County proposes to modify its Local Coastal Program's (LCP) Land Use Plan (LUP) maps by adjusting the Urban Services Line (USL) within a portion of the unincorporated community of Los Osos. Specifically, the amendment would modify the Estero Area Plan's land use maps by expanding the USL to include the Monarch Grove neighborhood, an existing built-out residential neighborhood in Los Osos. The proposed amendment would potentially allow Monarch Grove's residences to be served in the near future by the Los Osos Wastewater Treatment Plant (LOWWP) (now called the Los Osos Water Recycling Facility), which recently became operational.

Minor LCP Amendment Determination

Pursuant to Title 14 of California Code of Regulations (CCR) Section 13555, the Executive Director may determine that a proposed LCP amendment is "minor." 14 CCR Section 13554 defines minor LCP amendments. Among other things, minor LCP amendments include:

14 CCR Section 13554(a). Changes in wording which make the use as designated in the zoning ordinances, zoning district maps or other implementing actions more specific and which do not change the kind, location, intensity, or density of use and which are found by the Executive Director of the Commission or the Commission to be consistent with the land use plan as certified by the Commission.

If the Executive Director determines that an amendment is minor, that determination must be reported to the Commission. If one-third of the appointed members of the Commission request that it be processed as a major LCP amendment, then the amendment shall be set for a future public hearing; if less than one-third of the appointed members of the Commission object to the minor LCP amendment determination, then the amendment is deemed approved, and it becomes a certified part of the LCP immediately (in this case, on May 11, 2016).

The purpose of this notice is to advise interested parties of the Executive Director's determination that the proposed LCP amendment is minor.

The proposed LCP amendment will adjust the USL within the Los Osos community to include

LCP-3-SLO-16-0014-1 (Urban Services Line Adjustment, Monarch Grove Neighborhood, Los Osos)

the neighborhood of Monarch Grove, a fully developed neighborhood consisting of approximately 80 residences. The USL is one of the LCP's tools for defining urban-rural boundaries and delineating where future growth and development should be located. As such, the USL also serves as a proxy for determining the service area boundaries for public infrastructure. Only areas within the USL can be served by the LOWWP, per Special Condition 4 of the Commission's 2010 approval of Coastal Development Permit (CDP) number A-3-SLO-09-055/069, which authorized construction and operation of the LOWWP:

4. The approved service area for the wastewater treatment facilities corresponds to the area shown on the Service Area Map attached. Future additions to the wastewater treatment service area shall require a separate coastal development permit, and must be preceded or submitted concurrently with a Local Coastal Plan (LCP) amendment that incorporates the proposed service area expansion within the USL designated by the LCP.

The proposed USL adjustment would thus potentially allow the Monarch Grove neighborhood to be served by the LOWWP in the future, subject to a future CDP, and is the impetus behind the County's proposed LCP amendment.

The Monarch Grove neighborhood is developed with single-family dwellings and is currently served by a small package-treatment sewer plant operated by the Monarch Grove Homeowner's Association. The treatment plant has been subject to 70 violations within the last five years by the Central Coast Regional Water Quality Control Board (CCRWQCB). Allowing the USL adjustment as part of this amendment will facilitate the hook-up of the neighborhood to the LOWWP (via a future requisite CDP action), which will provide coastal resource benefits to the area due to the LOWWP's higher level of treatment (tertiary) and stringent wastewater reuse requirements, thereby resulting in anticipated reductions in the number of CCRWQCB violations. Furthermore, because the Monarch Grove neighborhood is already fully developed, incorporating the Monarch Grove neighborhood within the USL is consistent with the LCP's objectives of defining urban-rural boundaries, but will not result in any additional development. Finally, it is worth noting that because the Monarch Grove neighborhood is currently already served by a small package-treatment sewer plant, adjustment of the USL will simply change the provider of wastewater treatment services which are currently already provided to the neighborhood. Considering the above, the proposed amendment satisfies the definitional standard of a minor amendment as set forth in 14 CCR Section 13554(a) because the USL adjustment does not "change the kind, location, intensity, or density of use."

It is important to note that the Monarch Grove USL adjustment was included in the Public Review Draft of the Los Osos Community Plan (LOCP) (dated January 30, 2015). The LOCP is anticipated to be a component of the LUP that needs to be certified by the Commission, and as such is intended to serve as the planning document that comprehensively addresses development and other land use within Los Osos, such as identifying where and how much growth the community can handle, the capacity of the LOWWP, drinking water supply, open space locations, and other coastal resource concerns. The LOCP is a critical piece of the LUP in identifying and addressing these buildout and carrying capacity issues for the LOWWP; however, the LOCP is anticipated to take at least another year to complete by the County and then will need to be considered and approved by the Commission. Therefore, although the County arguably should have incorporated the proposed USL adjustment into LOCP

certification, because Monarch Grove is already fully developed and because this proposed LUP map amendment will not result in any additional development, including increased water usage, and will result in improved coastal water quality, Commission staff believes this proposed amendment, done outside of the LOCP certification process is warranted to ensure proper wastewater treatment and greater LCP consistency by better protecting coastal resources. However, any other future, anticipated adjustments related to LOWWP's service area should be addressed through the LOCP certification process, thereby ensuring a comprehensive lens by which to fully review and understand future growth in Los Osos. Considering the above, the proposed amendment satisfies the definitional standard of a minor amendment as set forth in 14 CCR Section 13554(a) because the Executive Director and Commission staff find the USL adjustment "to be consistent with the land use plan as certified by the Commission."

In conclusion, the proposed change will facilitate incorporation of the Monarch Grove neighborhood into the USL jurisdiction to ensure proper treatment of wastewater and to minimize impacts to other environmental resources (e.g., Morro Bay water quality). As such, the proposal strengthens the LCP by increasing coastal resource protection, and, because the neighborhood is fully developed and already served by a small package-treatment sewer plant, does not change the kind, location, intensity, or density of use of land. The amendment is thus consistent with and adequate to carry out the policies of Chapter 3 of the Coastal Act.

California Environmental Quality Act (CEQA)

The Coastal Commission's review and development process for LCPs and LCP amendments has been certified by the Secretary of Resources as being the functional equivalent of the environmental review required by CEQA. The County has determined that the project is exempt from further review under CEQA, pursuant to Section 15305 of the Public Resources Code, "Minor Alterations in Land Use Limitations," and a Notice of Exemption has been prepared. This report has discussed the relevant coastal resource issues with the proposal, and has concluded that the proposed LCP amendment is not expected to result in any significant adverse impact on the environment. Thus, it is unnecessary for the Commission to suggest modifications to the proposed amendment to address adverse environmental impacts because the proposed amendment, as submitted, will not result in any significant environmental effects for which feasible mitigation measures would be required.

Coastal Commission Concurrence

The Executive Director will report this minor LCP amendment determination, and any comments received on it, to the Coastal Commission at its May 11, 2016 meeting in Newport Beach. For any questions or needed additional information regarding the proposed amendment or the process under which it is being certified, please contact Daniel Robinson at the Central Coast District Office in Santa Cruz.

Exhibit:

Exhibit 1: Proposed Map Changes

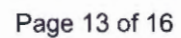


EXHIBIT B
LRP2014-00021:B

PROPOSED URBAN SERVICES LINE MAP CHANGE LRP2014-00021 (Monarch Grove)



EXHIBIT: LRP2014-00021
INITIATING AN OFFICIAL MAP
AMENDMENT AS SHOWN ON
OFFICIAL MAP ON FILE IN THE
DEPT. OF PLANNING AND
BUILDING

INCLUDE IN URBAN SERVICES
LINE

COUNTY OF
SAN LUIS OBISPO
GENERAL PLAN
AMENDMENT