

LAND USE ELEMENT - LOCAL COASTAL PLAN

SAN LUIS OBISPO COUNTY GENERAL PLAN



April 2006

*** Exhibit A – Cover Page Only ***

Complete document available on the Coastal Commission website (www.coastal.ca.gov) or at the Central Coast District Office.

**Board of Supervisor's
Approved Draft**

**Cambria and San Simeon Acres Community
Plans of the North Coast Area Plan**

SAN LUIS OBISPO COUNTY DEPARTMENT OF PLANNING & BUILDING

IN THE BOARD OF SUPERVISORS
COUNTY OF SAN LUIS OBISPO, STATE OF CALIFORNIA

Tues day April 4, 2006

PRESENT: Supervisors Harry L. Ovitt, Shirley Bianchi, Jerry Lenthall,
James R. Patterson and Chairperson K.H. 'Katcho' Achadjian

ABSENT: None

RESOLUTION NO. 2006 - 124

RESOLUTION TO AMEND THE SAN LUIS OBISPO COUNTY GENERAL PLAN, LAND USE ELEMENT/LOCAL COASTAL PLAN, CIRCULATION ELEMENT, NORTH COAST AREA PLAN AND THE COASTAL ZONE LAND USE ORDINANCE, AND TO ADOPT ORDINANCES ENTITLED "AN ORDINANCE AMENDING TITLE 23 OF THE SAN LUIS OBISPO COUNTY CODE, THE COASTAL ZONE LAND USE ORDINANCE; SECTIONS 23.05.050 AND 23.06.100 REGARDING WATER QUALITY AND DRAINAGE; SECTION 23.05.062 REGARDING TREE REMOVAL; SECTION 23.07.170 REGARDING DEVELOPMENT WITHIN OR ADJACENT TO ENVIRONMENTALLY SENSITIVE HABITATS; AND SECTION 23.07.172 REGARDING MINERAL EXTRACTION IN WETLANDS" AND "AN ORDINANCE AMENDING SPECIFIC SECTIONS OF THE SAN LUIS OBISPO COUNTY COASTAL ZONE LAND USE ORDINANCE, TITLE 23 OF THE COUNTY CODE" AND TO APPROVE THE ENVIRONMENTAL DOCUMENT.

The following resolution is now hereby offered and read:

WHEREAS, state law requires that a general plan be adopted; and

WHEREAS, the Land Use Element of the San Luis Obispo County General Plan was adopted by the Board of Supervisors on September 22, 1980, and is a proper element of the General Plan; and

WHEREAS, on March 1, 1988, the San Luis Obispo County Board of Supervisors adopted the Local Coastal Program as amendments and additions to the Land Use Element of the San Luis Obispo County General Plan, specifically incorporating the Land Use Plan of the Local Coastal Program into the Land Use Element of the General Plan hereinafter referred to as the "Land Use Element and Local Coastal Plan", and to the San Luis Obispo County Code Titles 19, 21, and 23; and

WHEREAS, state law, public necessity, convenience and general welfare requires that general and specific plans be amended from time to time; and

WHEREAS, the Planning Commission of the County of San Luis Obispo after noticed public hearings did recommend amendments to the Land Use Element/Local Coastal Plan and the Coastal Zone Land Use Ordinance - Title 23 of the County Code, adopted resolutions or otherwise took action recommending said amendments;

NOW THEREFORE, BE IT RESOLVED AND ORDERED by the Board of Supervisors of the County of San Luis Obispo, State of California, in a regular meeting assembled on the fourth day of April, 2006, that the County General Plan, the Land Use Element/Local Coastal Plan, Circulation Element, North Coast Area Plan, and the Coastal Zone Land Use Ordinance - Title 23 of the County Code, be amended as follows:

1. Amend the San Luis Obispo County General Plan, Land Use Element/Local Coastal Plan, Circulation Element, North Coast Area Plan, as appears on Exhibit LRP 2004-00024:B which is attached hereto and incorporated herein as though fully set forth; and pursuant to Public Resources Code, section 30514, authorize its submittal to the California Coastal Commission for consideration and certification.
2. Amend the San Luis Obispo County General Plan, Land Use Element/Local Coastal Plan, Circulation Element, North Coast Area Plan, official maps, as appears on Exhibits LRP 2004-00024:C which is attached hereto and incorporated herein as though fully set forth; and pursuant to Public Resources Code, section 30514, authorize its submittal to the California Coastal Commission for consideration and certification.
3. Amend the San Luis Obispo County General Plan, Land Use Element/Local Coastal Plan, Cambria Design Plan, as such amendment appears on Exhibit LRP 2004-00024:D which is attached hereto and incorporated herein as though fully set forth; and pursuant to Public Resources Code, section 30514, authorize its submittal to the California Coastal Commission for consideration and certification.

CCC Exhibit B
(page 1 of 3 pages)

4. Amend the San Luis Obispo County General Plan, Land Use Element/Local Coastal Plan, North Coast Area Plan, as appears on Exhibit LRP 2004-00024:E which is attached hereto and incorporated herein as though fully set forth; and pursuant to Public Resources Code, section 30514, authorize its submittal to the California Coastal Commission for consideration and certification.

5. Amend the San Luis Obispo County General Plan, Land Use Element/Local Coastal Plan, Circulation Element, North Coast Area Plan, official maps, as appears on Exhibits LRP 2004-00024:E which is attached hereto and incorporated herein as though fully set forth; and pursuant to Public Resources Code, section 30514, authorize its submittal to the California Coastal Commission for consideration and certification.

6. Adopt, enact and instruct the Chairman of the Board of Supervisors to sign "An Ordinance Amending Title 23 of the San Luis Obispo County Coastal Zone Land Use Ordinance, Title 23 of the San Luis Obispo County Code, the Coastal Zone Land Use Ordinance; Sections 23.05.050 and 23.06.100 regarding Water Quality and Drainage; Section 23.05.062 Regarding Tree Removal; Section 23.07.170 Regarding Development within or adjacent to Environmentally Sensitive Habitats; and Section 23.07.172 Regarding Mineral Extractions in Wetlands" which is attached hereto and incorporated herein as though fully set forth

7. Adopt, enact and instruct the Chairman of the Board of Supervisors to sign "An Ordinance Amending Specific Sections of the San Luis Obispo County Coastal Zone Land Use Ordinance, Title 23 of the County Code" which is attached hereto and incorporated herein as though fully set forth.

BE IT FURTHER RESOLVED AND ORDERED that the environmental documents for the above enacted amendments be approved as follows:

1. Regarding the Certified Final Environmental Impact Report (FEIR) as certified by the Board of Supervisors acting as lead agency, the Board of Supervisors hereby reviewed and considered the information contained in the FEIR. Further, the Board of Supervisors hereby adopts the recommended findings which are attached hereto as Exhibit LRP2004-00024:H and incorporated herein as though fully set forth.

BE IT FURTHER RESOLVED AND ORDERED that this resolution shall become operative automatically, pursuant to 14 California Code of Regulations §13551(b)(1), upon the certification by the California Coastal Commission and upon acknowledgment by the San Luis Obispo County Board of Supervisors of receipt of the Commission's resolution of certification pursuant to 14 California Code of Regulations §13544. In the event that the California Coastal Commission recommends modifications to said amendments, the amendments with modification shall be processed in accordance with Government Code § 65350 et seq., before final local government adoption of the amendments with the modifications suggested by Coastal Commission pursuant to 14 California Code of Regulations §13551(b)(2), or before the Board of Supervisors resubmits, pursuant to Public Resources Code Section 30512 and 30513, any additional amendments to satisfy the Commission's recommended changes.

BE IT FURTHER RESOLVED AND ORDERED that in accordance with Government Code Section 25131, after reading of the title of the ordinances, further reading of the ordinances in full is waived.

BE IT FURTHER RESOLVED AND ORDERED that this resolution shall be effective on the same date as Ordinances 3082 and 3083 said date being May 4, 2006.

Upon motion of Supervisor Bianchi , seconded by Supervisor Lenthall , and on the following roll call vote, to wit:

AYES: Supervisors Bianchi, Lenthall, Ovitt, Patterson, Chairperson Achadjian

NOES: None

ABSENT: None

ABSTAINING: None

The foregoing resolution is hereby adopted.

K.H. ACHADJIAN

Chairman of the Board of Supervisors
of the County of San Luis Obispo,
State of California

ATTEST

JULIE L. RODEWALD

County Clerk and Ex-Officio Clerk
of the Board of Supervisors,
County of San Luis Obispo,
State of California

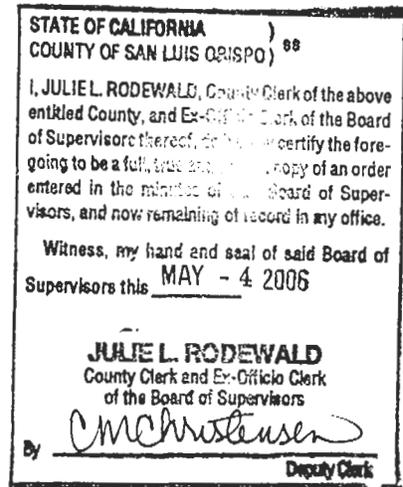
By: C.M. CHRISTENSEN Deputy Clerk
[SEAL]

APPROVED AS TO FORM AND LEGAL EFFECT:

JAMES B. LINDHOLM, JR.
County Counsel

By: 
Deputy County Counsel

Dated: 3-21-06



LEGEND

LAND USE CATEGORIES

AG	Agriculture
FL	Rural Lands
REC	Recreation
RR	Residential Rural
RS	Residential Suburban
RSF	Residential Single Family
RMF	Residential Multiple Family
O/P	Office & Professional
CR	Commercial Retail
CS	Commercial Service
IND	Industrial
PF	Public Facilities
OS	Open Space

BOUNDARIES

---	Urban Reserve Line (URL)
---	Urban Service Line (USL)
- · - · -	Village Reserve Line (VRL)
---	Planning Area
.....	Central Business District

SCALE

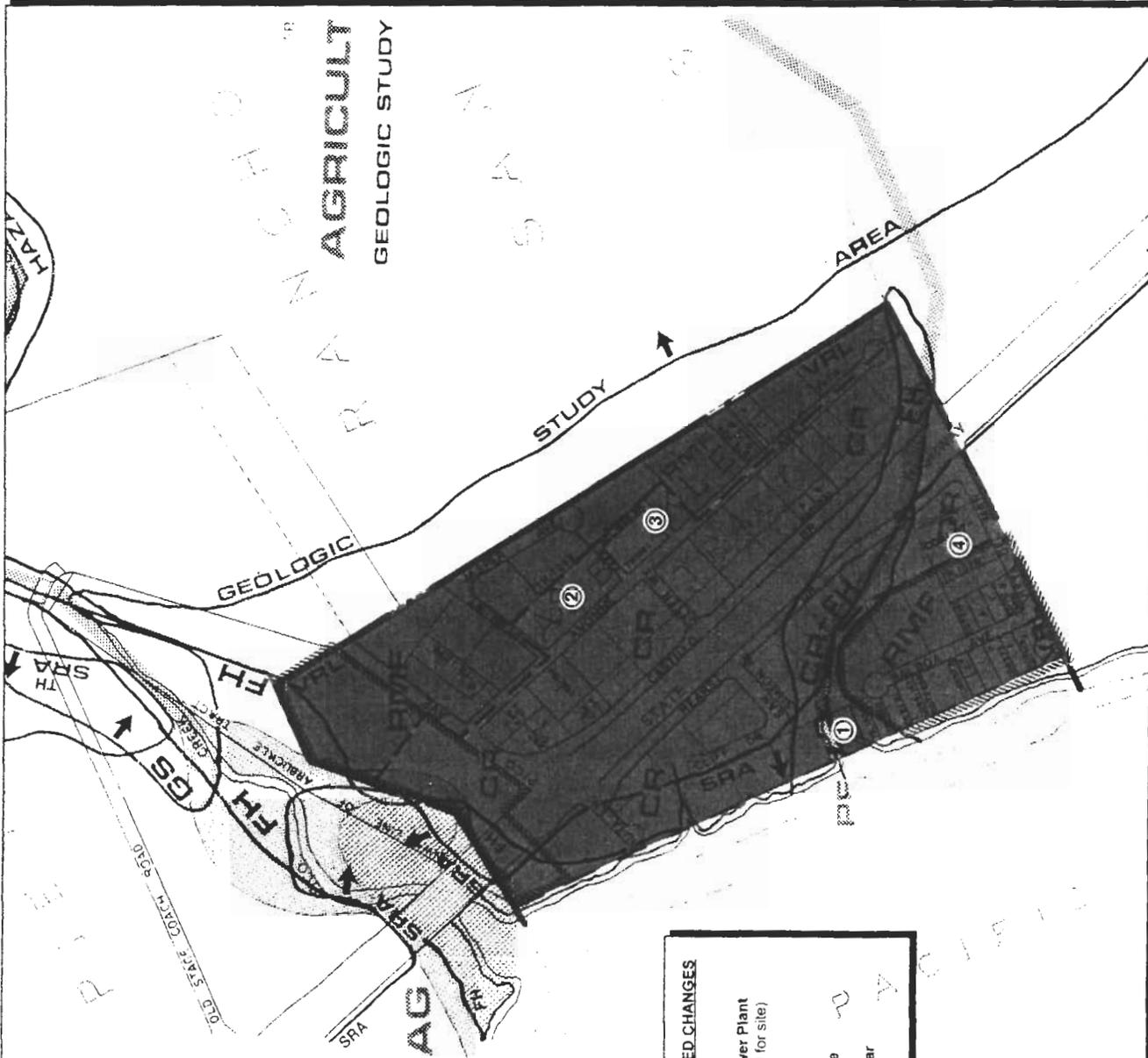


NOTE: This map is for reference purposes only. Official maps showing precise property lines and land use category boundaries are on file in the Planning Department.

5 SAN SIMEON
LAND USE CATEGORIES
Proposed Changes

July 2004

San Luis Obispo County Department of Planning and Building



SAN SIMEON - PROPOSED CHANGES

Project Description
1. SSACSD Existing Sewer Plant RMF to PF (approval for site) (0.5 ac)
2. Ramey CR to RMF (2.2 ac)
3. Sansone - Avonme Ave CR to RMF (2.0 ac)
4. Sansone - Vista del Mar CR to RMF (0.52 ac)

CCC Exhibit C
(page 1 of 7 pages)

LEGEND

COMBINING DESIGNATIONS

AR	Airport Review Area
ARCH-SEN	Archaeologically Sensitive Area
GS	Geologic Study Area
FH	Flood Hazard
H	Historic
EX	Energy & Extractive Area
EX ₁	Extractive Area
LCP	Local Coastal Plan
V	Visitor Servicing Area
SRA	Sensitive Resource Area

PROPOSED PUBLIC FACILITIES

(HS)	High School
(JHS)	Jr. High School
(E)	Elementary School
(P)	Park
(PSS)	Police / Public Safety Facility Station
(WTF)	Water Treatment Facility
(STF)	Sewage Treatment Facility
(SWF)	Solid Waste Facility
(GF)	Government Facility
(L)	Library

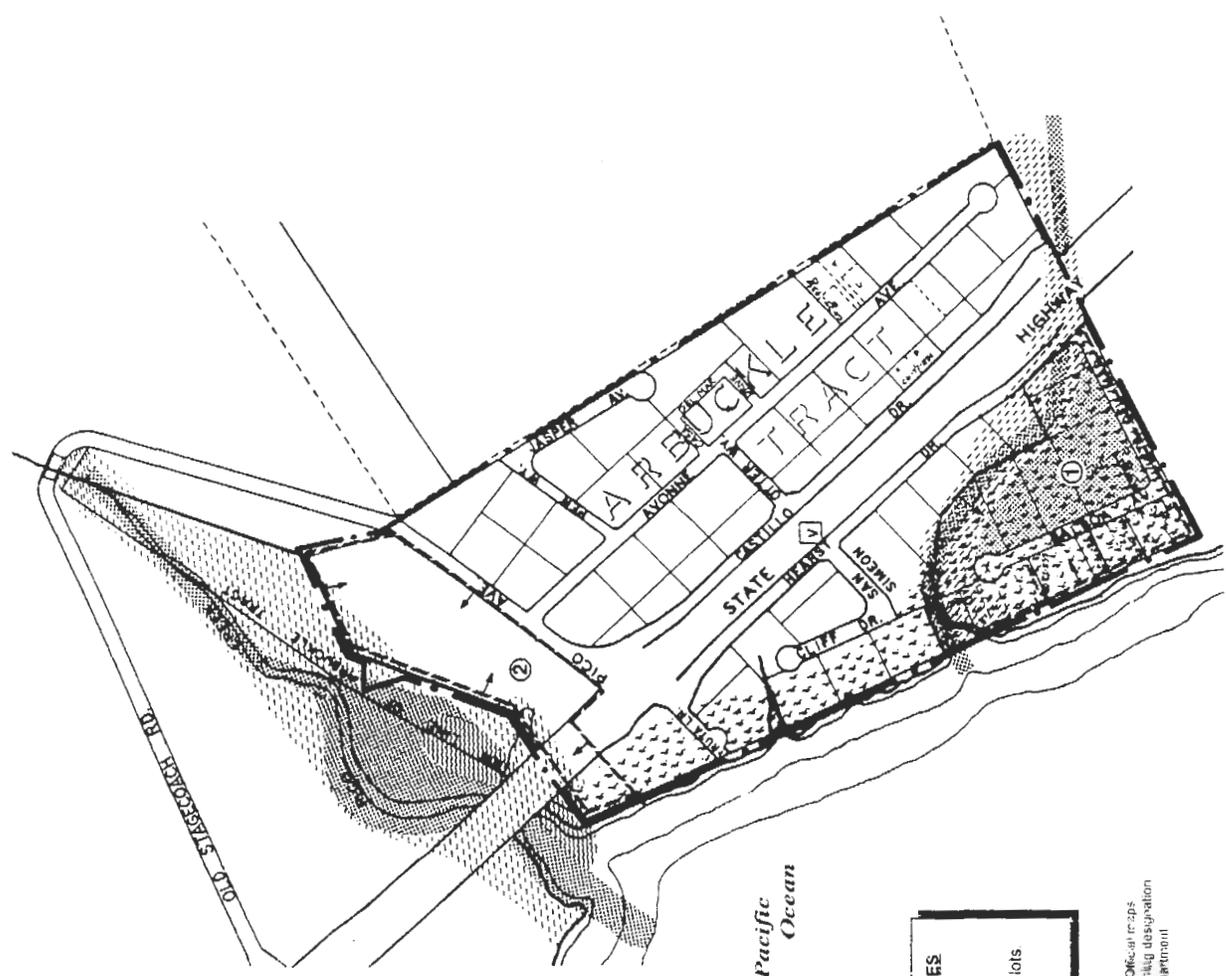
SRA'S THAT ARE ENVIRONMENTALLY SENSITIVE HABITATS

(TH)	Terrestrial Habitats
(CS)	Coastal Streams & Riparian Vegetation
(W)	Wetlands
(MH)	Marine Habitat



6 **SAN SIMÉON**
COMBINING DESIGNATIONS
Proposed Changes
 July 2004

San Luis Obispo County Department of Planning and Building



COMBINING DESIGNATION CHANGES
 Project Description
 1. SRA Adjustment
 Remove SRA from developed lots
 2. △ Park

NOTE: This map is for reference purposes only. Official maps showing precise property lines and combining designation boundaries are on file in the Planning Department.

LEGEND

CIRCULATION

	EXISTING		PROPOSED		Principal Arterial
					Arterial
					Collector
					Interchange

COASTAL ACCESS

Note: For existing and proposed coastal access see chapter 8 of the North Coast Area Plan.

EXISTING PROPOSED

VP [VP] Vista Point

SCALE

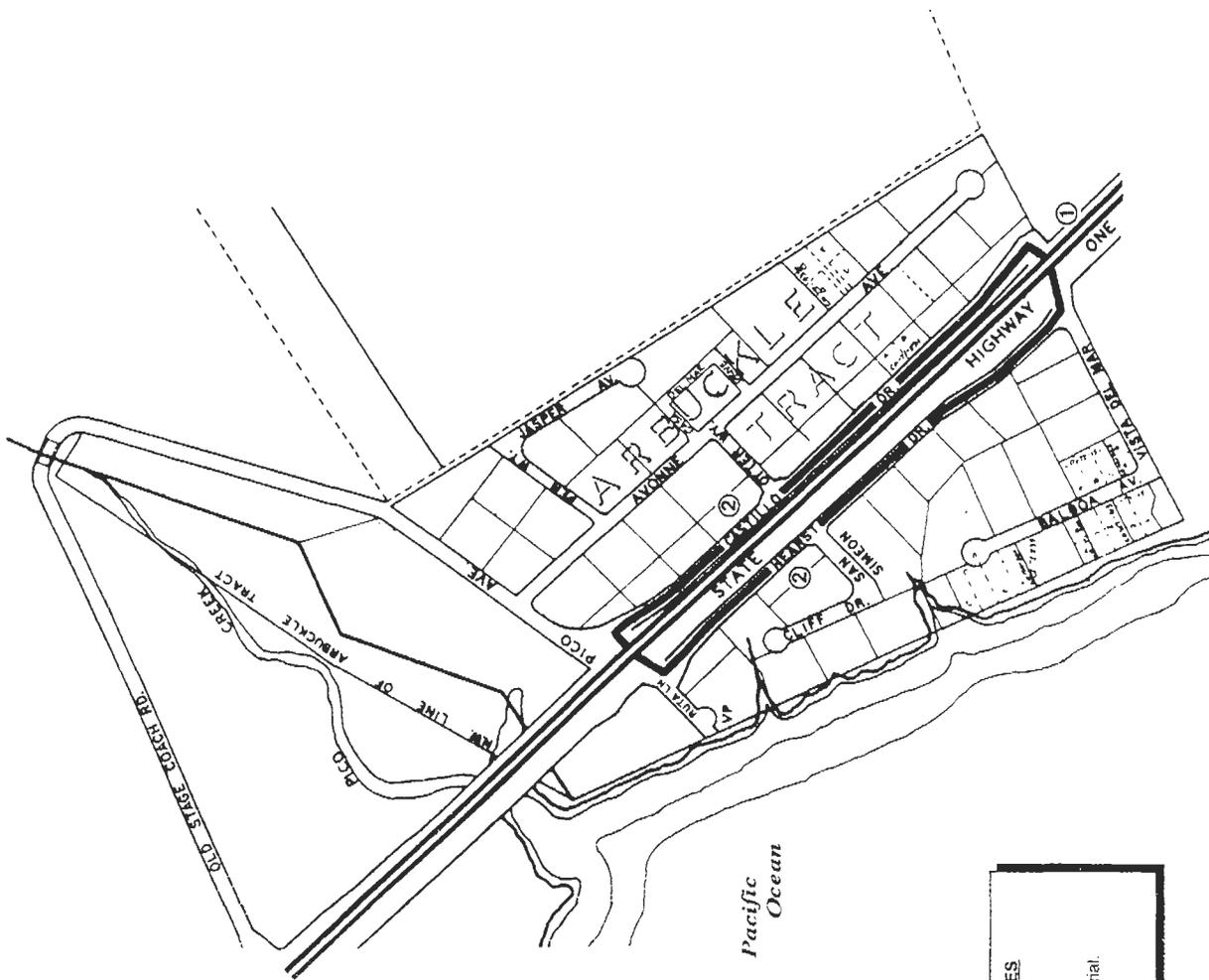


NOTE: This map represents official circulation information. Accuracy is for planning purposes only, and do not imply that legal or physical access exists.

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SAN SIMON
CIRCULATION
Proposed Changes

July 2004

San Luis Obispo County Department of Planning and Building



CIRCULATION PLAN CHANGES

Project Description
1. Highway One Arterial to principal arterial
2. Castillo Dr. / Hearst Dr. Change to arterial



- CAMBRIA - PROPOSED CHANGES**
 Project Description
1. Cambria CSD #3 Main Street
 RSF to CR (1.4 ac)
 2. Connelly & Childs
 RMF & O/P to RMF & CR
 (RMF 1.5 ac, CR 2.25 ac)
 3. Aiken
 RS to CS (3.85 ac)
 4. Kreps/Meltzer
 CR to RMF (Existing tract 226)
 (4 ac total, 34 existing lots)
 5. Unused
 6. Rhodes/Crawford
 RMF & RSF to AG (15.5 ac)
 Remove from URL
 RMF to REC (14 ac)
 7. J Patrick House
 RMF to REC (14 ac)
 8. State Parks
 OS to REC (parking lot, 3 ac)
 a. REC to OS (47.4 ac)
 b. RMF to REC (18.1 ac)
 c. CR to OS (10 ac)
 9. Newman/Londonderry
 RMF to RSF (4 ac)
 10. South Cambria
 a. RS to RL (43 ac)
 b. RS to AG (32 ac)
 11. West Ranch
 RSF to OS (170 ac)
 Add all to USL
 12. MidState Bank
 REC to CR (1.5 ac)
 13. Santa Rosa Creek
 Various categories to OS (55 ac)
 14. CCSD / Bahringer
 RMF to PF (6 ac)
 15. CCSD small lot properties
 Change to REC

LEGEND

LAND USE CATEGORIES

AG	Agriculture
RL	Rural Lands
REC	Recreation
RR	Residential Rural
RS	Residential Suburban
RSF	Residential Single Family
RMF	Residential Multiple Family
O/P	Office & Professional
CR	Commercial Retail
CS	Commercial Service
IND	Industrial
PF	Public Facilities
OS	Open Space

BOUNDARIES

---	Urban Reserve Line (URL)
---	Urban Service Line (USL)
---	Village Reserve Line (VRL)
---	Planning Area
.....	Central Business District

SCALE

0 1600'

NORTH

NOTE: This map is for reference purposes only. Official maps showing precise property lines and land use category boundaries are on file in the Planning Department.

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CAMBRIA

LAND USE CATEGORIES
 Proposed Changes

July 2004

Resulting URL / USL

LEGEND

COMBINING DESIGNATIONS	
AR	Airport Review Area
ARCH-SEN	Archaeologically Sensitive Area
GS	Geologic Study Area
FH	Flood Hazard
H	Historic
EX	Energy & Extractive Area
EX ₁	Extractive Area
LCP	Local Coastal Plan
V	Visitor Serving Area
SRA	Sensitive Resource Area

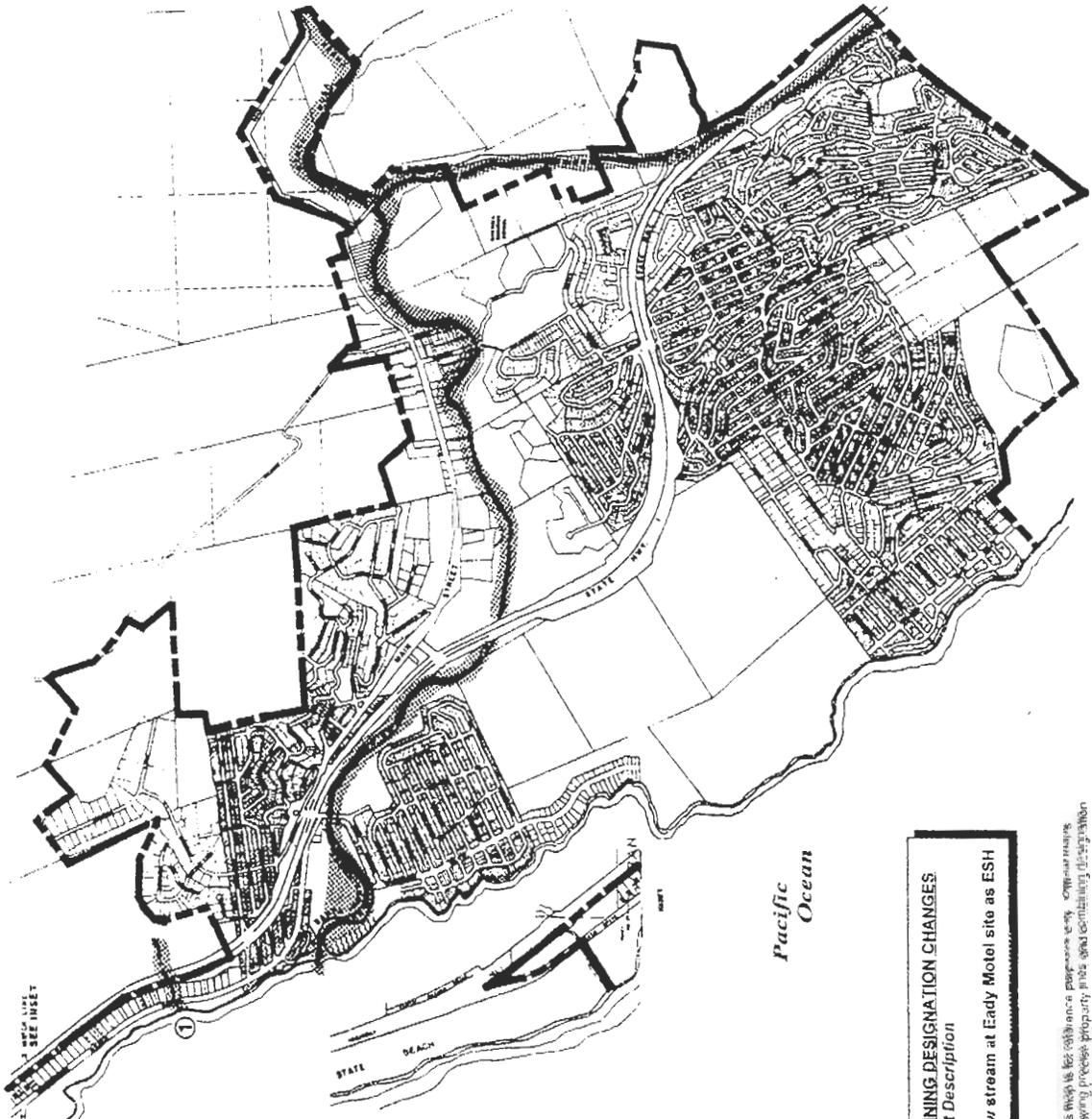
PROPOSED PUBLIC FACILITIES	
HS	High School
JHS	Jr. High School
E	Elementary School
P	Park
PS	Police / Public Safety Facility Station
WT	Water Treatment Facility
ST	Sewage Treatment Facility
SW	Solid Waste Facility
GF	Government Facility
L	Library

SPACES THAT ARE ENVIRONMENTALLY SENSITIVE HABITATS	
TH	Terrestrial Habitats
CS	Coastal Streams & Riparian Vegetation
W	Wetlands
M	Marine Habitat



10
COMBINING DESIGNATIONS
 Proposed Changes
 July 2004
 Map 2 of 2

San Luis Obispo County Department of Planning and Building



COMBINING DESIGNATION CHANGES
 Project Description
 1. Show stream at Eady Motel site as ESH

NOTE: This map is for informational purposes only. Official maps showing precise property lines and containing designations, boundaries and other information are available at the Planning Department.

LEGEND

CIRCULATION

- | | | |
|-----------------|-----------------|--------------------|
| EXISTING | PROPOSED | Principal Arterial |
| | | Arterial |
| | | Collector |
| | | interchange |

COASTAL ACCESS

NOTE: For existing and proposed coastal access see Chapter 8 of the North Coast Area Plan

VP [VP] Vista Point

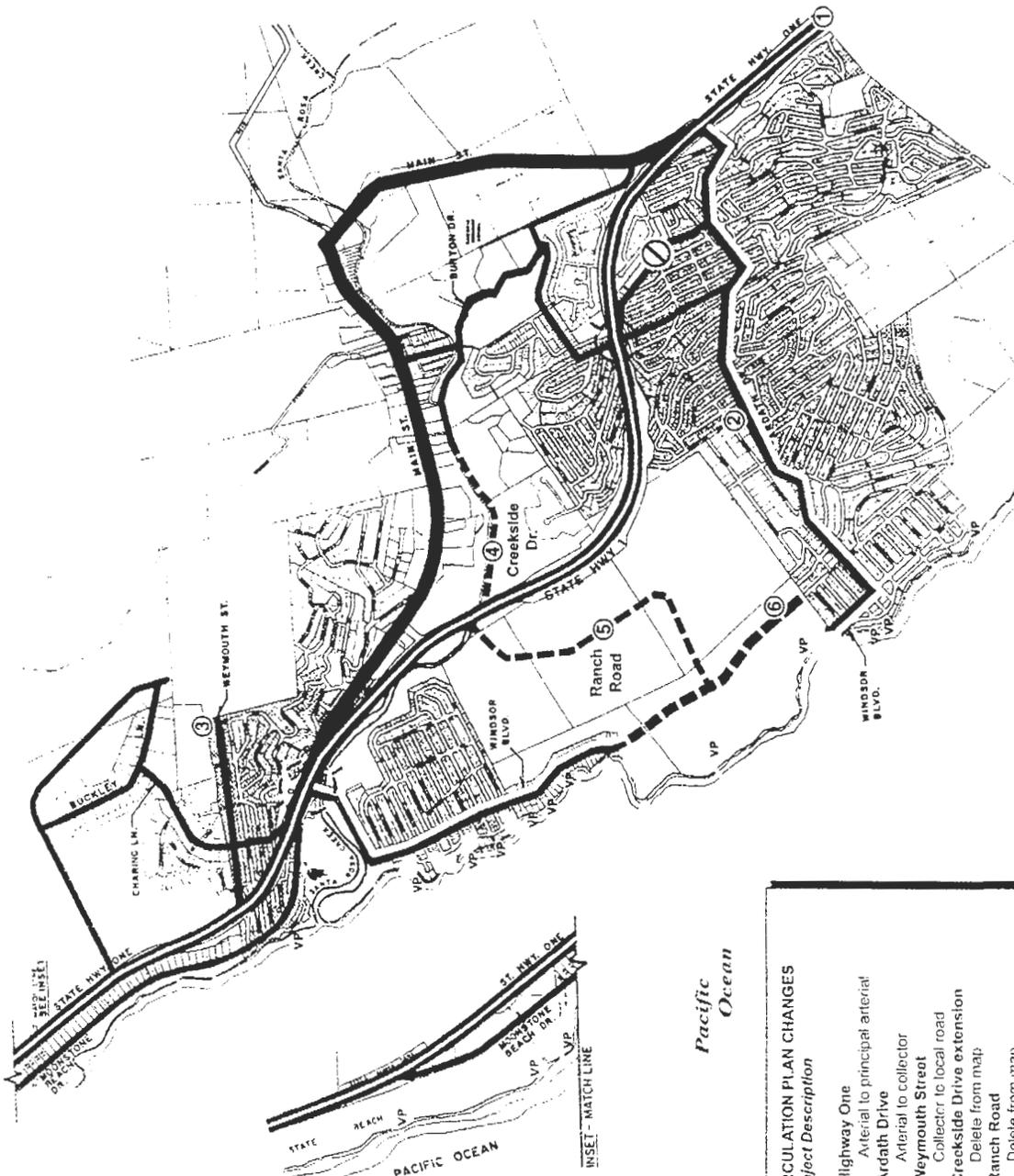
SCALE



NOTE: This map represents official circulation information. Areas are for planning purposes only, and do not imply that legal or physical access exists.

11 **CAMBRIA**
CIRCULATION
Proposed Changes
July 2004

San Luis Obispo County Department of Planning and Building



- CIRCULATION PLAN CHANGES**
Project Description
1. Highway One
Arterial to principal arterial
 2. Ardath Drive
Arterial to collector
 3. Weymouth Street
Collector to local road
 4. Creekside Drive extension
Delete from map
 5. Ranch Road
Delete from map
 6. Windsor Blvd Extension
Realign to connect with Marborough Lane

CALIFORNIA COASTAL COMMISSION

CENTRAL COAST DISTRICT OFFICE
725 FRONT STREET, SUITE 300
SANTA CRUZ, CA 95060
PHONE: (831) 427-4863
FAX: (831) 427-4877



November 8, 2005

Martha Neder
SLO County Planning and Building Department
County Government Center, Rm. 310
San Luis Obispo, CA 93408-2040

Subject: *Cambria and San Simeon Acres Community Plans*

Dear Ms. Neder:

Thank you for forwarding the above-referenced community plans to our office for review. The plans are a request by the County to update and amend the community plan portions of the North Coast Area Plan and the Coastal Zone Land Use Ordinance (CZLUO) of the certified Local Coastal Program (LCP). Given the critically important coastal resource issues involved, we appreciate the chance to work with the County in the local review process.

We have provided a series of comments regarding the May 2005 draft plans and their relation to the California Coastal Act, current LCP Policies and Ordinances, and other planning concerns of the Coastal Commission staff. Because the Coastal Commission has to approve the community plans consistent with the California Coastal Act, we offer the following comments. The comments below are written in two sections: overall comments on some of the most significant Coastal Act and LCP issues raised by features in the plans, and other more text specific comments.

I. Coastal Act and LCP Issues

A. New Development and Public Services (Coastal Act Section 30250)

The Coastal Act includes several policies that address the location, type, and intensity of new development to ensure the protection of coastal resources. Overall, these requirements reflect a fundamental goal of the Coastal Act: protection of coastal resources by concentrating new development in existing developed areas able to accommodate it.

CAMBRIA

We have concerns regarding the Cambria Community Plan as it affects new development and the availability of adequate public services. We are encouraged by the programs and standards presented in the plan dealing with the huge disparity between vacant building sites and limited water supplies in Cambria. However, we believe some of the new programs and standards, particularly those dealing with priority uses, growth management, the allocation of residential permits, and service extensions outside of the Urban Services Line (USL), do not adequately support the Coastal Act.

The new programs and standards included in the submittal attempt to address the disparity between growth and available services, but don't appear to address the root problem of assuring

CCC Exhibit D
(page 1 of 37 pages)

sustainable water supplies in Cambria. Chapter 3 (Services and Resources) concedes that safe yields in Cambria, particularly during low rain years, are likely inadequate. Chapter 3 provides valuable data covering the current status of public facilities, services, and resources. However, we feel that estimating water availability for new urban uses based on existing entitlements, wait lists, and future allocation patterns, are only some of the factors that need to be considered in the discussion of sustainable water resources. Determining the true amount of water available for new development must be based on a more informed analysis of safe yield balanced with the need to protect riparian and wetland habitats, and must include provisions for current and potential agricultural uses in the two watersheds. Only after this type of analysis is completed can the amount of water for sustainable new development in Cambria and San Simeon be adequately estimated.

We encourage the County to review available water information for area creeks based on below average rainfall years, and begin a study of instream flow requirements for these creeks. Although this issue in Cambria is addressed under Cambria Service Program 10A (page 3-43), the program is non-binding with an “on-going” timetable for completion. A more protective approach should be examined for Cambria that requires time-certain completion of instream flow studies with development restrictions for non-completion. This is the approach currently required for San Simeon Acres under the proposed plan and should be seriously considered for Cambria as well (see San Simeon Communitywide Standard 1C, page 7-99).

As described below, other development standards do not appear to support the Coastal Act.

Communitywide Standard 1 – Reservation of Service Capacity (page 7-14). This standard reserves on a yearly basis 20% of the sewer and water capacity to visitor-serving and commercial uses. Five percent of this 20% may be allocated to affordable housing projects. In addition to concerns about conflicts with the priority use policies of the Coastal Act, this standard raises two other important questions: 1) What happens to the allocation if all of it is not used in a particular year; and, 2) How will this policy be implemented? It appears that this standard relies on the CCSD for implementation. In such a case, it must be demonstrated that the CCSD has adequate implementation measures consistent with Coastal Act policies for priority uses.

Communitywide Standard 2 – Growth Management and Allocation of Residential Permits (page 7-14 through 7-16). This standard is one of the most important new standards proposed in the Cambria plan. This standard limits the issuance of water letters to no more than 1% of the existing number of dwellings within the URL per year and codifies the Title 26 Growth Management Ordinance (GMO). A maximum number of 125 residential permits per year is allowed under subsection B of the standard. In addition, this standard allows the CCSD to provide services outside of the USL or URL under limited circumstances, requires new subdivision projects to retire an equivalent number lots, and ensures that future desalinization plants be owned and operated by the CCSD.

In general, this standard is problematic because the GMO has not been certified as part of the LCP and therefore it is unclear if the GMO can be effective in the coastal zone. We suggest that if the County wants the proposed standard be effective, Title 26 should be submitted separately

for certification, or be included in its entirety for review within the community plan document.

Another primary issue raised by this proposed standard is the concept that water allocation letters not issued in any given year, can be allocated in any following year. This system allows allocations to “stockpile” or “accrue” for use in a later year (Communitywide Standard 2.A.3. page 7-14). This policy would render the 1% growth cap ineffective, with the result that growth in Cambria could accelerate rapidly in a short amount of time once the water moratorium is lifted and all of the accrued water commitments are developed. It is possible under this scenario that the rate of development would outpace the availability of public services such as water supply. We urge the County to consider not allowing allocations to be issued or to accrue during the water moratorium. At such a time when a reliable water resource is established, water hook-ups could then be issued at 1% annually. As proposed, it does not appear this new standard is adequate to address the critical issue of limited water supply in Cambria.

Section 2.C. of this proposed standard allows the CCSD to provide services outside of the USL or URL under certain circumstances. The overriding concern with this standard is the potential for new development to occur outside of existing developed areas and further weaken the “hard edge” of the urban area. The plan should more fully address the cumulative effects of the standard on Cambria’s service capacities and natural landscape through a detailed mapping and inventory of the specific sites that would fall into the exception categories listed in the standard.

Section 2.D. requires that new residential land divisions retire an “equivalent legal lot”. While this new standard appears to be a positive step in eliminating additional development potential through land divisions, the term “equivalent legal lot” needs to be better defined. It should be clear that this means not only an equivalently sized parcel, but the parcel proposed for retirement should also be equivalent in terms of actual development potential. The retirement of equivalent legal lots under this provision should consider other factors on the parcels such as the presence of ESHA, steep slopes, scenic views, or other development constraints to ensure an equitable retirement.

Transfer of Development Credits (TDC)

The TDC program is one method to address the problem of existing small lots in Cambria. The transfer of building potential to other areas of Cambria, however, raises concerns about the cumulative impacts of increased development in these receiving areas, including issues of community character and nonpoint source pollution.

The updated standards for the TDC program in Chapter 7 seem to improve upon the existing program through expanded participation and limitations on the use of TDC’s when larger homes have the potential adversely impact resources. While the TDC program seems improved under the update, additional standards should be considered. As detailed in the 2001 Periodic Review Recommendation 2.18, one idea for the County to consider is a standard to address the minimum area of native landscape that must be preserved, regardless of lot size.

Communitywide Standard C.3 Resale Provision (page 7-73): This new TDC provision establishes a resale option to support additional land purchases. While this may be acceptable in

some cases, more information is needed regarding implementation. Specific measures should be included that ensure maximum resource protection. The term “appropriately sited building sites” should be articulated and clear performance standards should be detailed in the provision.

Land Use Changes

The community plans propose changes to existing land use designations that will change the type, location, and intensity of development in the urban areas of Cambria. The nature of particular land use designation changes determines which Coastal Act and LCP policies are relevant. Major land use changes with potentially significant impacts are discussed in the following section:

- 1) Cambria CSD #3 Main Street: Residential Single-Family to Commercial Retail. This vacant 1.4 acre parcel is located in the West Village of Cambria and is designated RSF. Under the proposed plan, the County would change the land use designation to CR. Any development would displace informal parking, require building in the flood hazard area, and be subject to potential geologic hazard from the steep slopes at the rear of the site. Traffic levels on Main Street could also increase. As discussed at length in the NCAPU, this proposed change appears inconsistent with Coastal Act sections 30250 and 30253.
- 2) Connelly and Childs: Residential and Office/Professional to Commercial Retail. This site is located on the south of Main Street and slopes gently south towards Santa Rosa Creek. The easterly approximately one-third of the site is zoned Office Professional; the westerly approximately two-thirds is designated Residential Multi-Family. A mobile home park is located on the southern part of the westerly two-thirds of the site. The County is proposing to maintain roughly 1.5 acres in the rear of the property for RMF and designate the remaining 2.25 acres to Commercial Retail use. Issues related to this proposed change are future development in a flood hazard area and increasing traffic on Main St. Recently, issues have been raised regarding the closure and conversion of mobile home parks and the retention or replacement of affordable housing units (see A-3-SLO-05-046). In terms of existing patterns of development and location, it makes sense to change the O/P designation to Commercial Retail. However, the RMF designation should be retained for the area of the existing mobile home park, and other residential uses should not be allowed. In any event, the issue of replacement affordable housing units and future use of the mobile home park is one that should be carefully reviewed for consistency with 30250, 30251, and 30253. In addition, the land use change should be reviewed for consistency with Section 23.04.092 of the CZLUO.
- 3) Aiken: Residential Suburban to Commercial Service. This 3.85-acre parcel is characterized by steep to gently rolling slopes with grasslands and Monterey pine forest habitat. In addition to habitat protection, issues are raised by the geologic hazard presented by the steep slopes on the rear of the parcel and the potential for increased traffic on Burton Drive and other streets in the vicinity. According to the land use maps, approximately 60 percent of the site is covered by a geologic study overlay, recognizing the potential hazard to development below the steep slopes. The potential for increases in

water use should also be evaluated. A detailed evaluation of consistency with section 30250 is necessary.

- 4) Kreps/Meltzer: Commercial Retail to Residential Multi-Family. This four-acre site is surrounded by residential areas and contains 34 existing lots. According to the data provided in the NCAPU, the proposed change could accommodate roughly 104 multi-family residential units, with a potential of 225 persons. At this time, even buildout of existing lots of record are of concern in Cambria. Given the current lack of sustainable water supplies, increases in the number of lots could be problematic. However, commercial use may not be the best for this site given its location in an otherwise completely residential area, and being less than one-half mile from the commercial core of the East Village. As discussed in the NCAPU, a more suitable residential use of the site may be single-family residential in order to reduce the overall number of units and persons. Another option would be to change the land use designation to RSF and encourage re-subdivision of the property. Ideally, such a re-subdivision would be accompanied by lot reduction elsewhere on Lodge or Park Hills. Thus, we encourage the County to consider a land use change to RSF (not RMF) with appropriate site design to be consistent with the surrounding area.
- 5) Newman/Londonderry: Residential Multi-Family to Residential Single-Family. This is a 4-acre site comprised of numerous small lots in east Lodge Hill. Some of the lots are already developed with residential units. Issues raised are related to the change in neighborhood character that would come with a change from attached RMF units to detached RSF units. With the proposed change there would be a slight reduction in total potential number of building sites and dwellings. Because of this decrease in development intensity and current land use in the area, the proposal appears consistent with Coastal Act section 30250. Future residential development of the site should be clustered to avoid excessive ground disturbance, tree removal, and scattered residential development.
- 6) South of Cambria Properties: Residential Suburban to Rural Lands (43 acres) and Residential Suburban to Agriculture (32 acres). Proposed land use changes in this area affect parcels totaling approximately 75 acres. The proposal also shifts the USL to exclude the properties from receiving urban services. In the case of the 32 acre parcel, the proposed plan shows a change from Residential Suburban (RS) to Agriculture (AG). In this case, however, a more appropriate land use designation is Open Space (OS) due to the presence of sensitive Monterey pine forest habitat and the embedded recreational use of Camp Ocean Pines. The Coastal Commission recently approved an LCP amendment changing the land use of the 32 acre property from Residential Suburban (RS) to Open Space (OS) (see SLO-MAJ-1-04 Part 2). The 43-acre parcel is to be changed from Residential Suburban (RS) to Rural Lands (RL). On the surface, both of these changes appear to reduce the amount of future development potential to the benefit of coastal resources. With the modification to OS for the 32-acre property, the land use change appears consistent with Coastal Act Sections 30240 and 30250.

- 7) Mid-State Bank: Recreation to Commercial Retail (portion) and removal of Visitor-Serving Combining Designation. The proposed land use change would result in 1.5 acres of the site to be changed from Recreation (REC) to Commercial Retail (CR). Flooding on the site and the potential to exacerbate flooding in the West Village are major issues with any development of this site. As stated in the NCAPU, specific requirements for this site may be inadequate to address the overall flooding potential on this site and in the West Village. The NCAPU recommended denial of a commercial land use change in this area due to inconsistencies with Section 30253 of the Coastal Act. More information will be necessary to find a commercial project on this site consistent with the Coastal Act. The removal of the visitor-serving combining designation for this site is also an issue. There is little information included in the plan showing that the visitor-serving (V) combining designation is no longer necessary or would be better served in a different village location. Thus, the combining designation change may be inconsistent with Section 30222 of the Coastal Act, which requires land suitable for visitor-serving commercial facilities have priority over general commercial.

SAN SIMEON ACRES

Land Use Changes

There are four land use changes proposed in San Simeon Acres. The first would appropriately designate the wastewater treatment plant as a Public Facility (PF). For three properties (Ramey - 2.2 acres; Sansone - 2 acres; and Sansone Vista Del Mar - .52 acres) the land use designation would be changed from Commercial Retail (CR) to Residential Multi-Family (RMF). Under the proposed plan, approximately 5 acres of commercial retail area would be lost to residential uses. It is possible that these land use change would decrease the amount of water use and traffic generated. However, these land use changes must consistent with the Coastal Act, which gives visitor serving uses priority over residential uses. Additional information will be required to fully analyze these land use changes for consistency with the Coastal Act. Specifically, this information should demonstrate why the CR land use designation is no longer necessary at these locations, or if this land use can be supported elsewhere in the community. San Simeon Acres is a largely visitor-serving destination area and maintaining land for visitor-serving and commercial uses is important. Thus, these changes appear problematic whether they provide consistency with the Coastal Act.

B. Environmentally Sensitive Habitat Areas (ESHA's) (Coastal Act Sections 30240, 30230, 30231, and 30250a)

One of the primary objectives of the Coastal Act is to preserve, protect, and enhance environmentally sensitive habitat areas (ESHA). In both Cambria and San Simcon Acres ESHA's are abundant. Identified ESHA areas include: marine habitats, streams and riparian habitats, wetlands, and terrestrial habitats.

As discussed in both the NCAPU and the Periodic Review of 2001, the Combining Designation maps do not effectively delineate all locations of potential ESHA, and therefore should not be

relied upon to identify the particular areas where biological evaluations are needed. The LCP definition of ESHA should be revised to conform to Coastal Act section 30107.5. It should also be clarified that application of the ESHA protection standards is not limited to the areas mapped as Combining Designations (Rec. 4.1 p.124).

The Periodic Review also recommends updating the requirements for biological investigations and reports. CZLUO Section 23.07.170 should be revised so that biological reports are prepared for all development within or adjacent to ESHA and not just those sites that have been mapped as ESHA. The submittal appears to weaken the application content requirements of CZLUO Section 23.07.170(a) by adding the following language:

a. Application content. Unless a comprehensive program or list of standards already exists, and mitigation measures have already been identified that will reduce potential impacts to less than significant levels, and the proposed project will incorporate all feasible mitigation measures, a land use permit application for a project on a site located within and adjacent to an Environmentally Sensitive Habitat shall also include a report by a biologist approved by the Environmental Coordinator that: ...

It is unclear if the “list of standards” and “mitigation measures” would be adequate to protect ESHA consistent with the LCP and Coastal Act. How would these list or mitigation measures be established? How would they be deemed adequate? It is also unclear if this new language addresses new information and changes to habitat areas over time. It seems possible that the lists of standards and mitigation measures may not reflect current on the ground conditions or changed circumstances. More information would be needed to approve this revision consistent with the amended CZLUO.

Monterey pine forest (SRA) (TH) Combining Designation Standard (page 7-7 through 7-11), Although this standard attempts to reduce redundancy and provide consistency in the planning process, Section 2.B. still relies on CZLUO Section 23.07.170 to determine where a biological report is required. As discussed above, biological reports should be prepared for all development within or adjacent to ESHA, not just those areas mapped in the LCP.

Combining Designation Areawide Standard 8 – Clustering of Development Required. This standard requires clustering for new land divisions and multi-family residential projects within forested areas. The standard limits, when feasible, new development to slopes less than 20%. For this standard to be effective, the term “forested areas” needs to be better defined. It is unclear if this term is an ESHA designation or not. If so, this standard raises consistency issues with Coastal Act policies that limit new developments in ESHA to resource dependent uses.

Communitywide Standard 8 (A-C) - Santa Rosa Creek Frontage (page 7-17). These standards should include measures to address lighting and noise impacts on riparian habitats. Past projects in this area have used window treatments, low profile lighting fixtures, and specialized building materials to reduce noise emissions.

C. Water Quality and Marine Resources (Coastal Act Section 30230 – 30231)

The Coastal Act includes numerous policies to protect water quality and marine resources. Marine resources are to be protected, maintained, and where feasible, restored. The biological productivity of coastal waters, including streams, estuaries and wetlands, must be maintained. Requirements include controlling runoff and waste discharges to protect water quality, maintaining groundwater supplies and stream flows in order to sustain the biological productivity of coastal waters, and minimizing the alteration of riparian habitats and streams.

One major proposed change to the Cambria and San Simeon community plans is the inclusion of combining designation standards for projects with point-source marine discharges (Combining Designation Standard 1 – Projects with Point Source Discharges (Cambria page 7-5 and San Simeon page 7-97)). The proposed standard may not provide consistency with Coastal Act Sections 30230-30231. Specifically, detailed biological studies prior to construction, as well as long term monitoring provisions are lacking in the proposed amendment. In addition, this amendment should also consider a suite of standards, much like those included for the Monterey pine forest (TH) that detail the types of resource protection measures that must be in place during construction of any marine outfall project.

CAMBRIA

Urban development proposed under the Cambria plan has the potential to impact water quality and marine resources. Residential development and road construction have led to increased runoff from impervious surfaces, resulting in a higher rate and volume of runoff, and possible changes in flow patterns and rates of sedimentation into streams.

The proposed plan updates water quality standards for single-family residential development but does not include similar update standards to Multi-Family Residential and Commercial development categories. For example, Residential Single Family Standards 4 and 5 address topographic issues and erosion control measures, but the proposed amendment does not apply these measures to other land use designations. As discussed in the Periodic Review of 2001, one of the main areas where the LCP needs to be updated is in addressing ongoing runoff from all development. The amendment should incorporate measures to address ongoing nonpoint source pollution, regardless of location, type or size of the development. In addition, specific performance standards to ensure that water quality is adequately protected should be included when erosion control and drainage plans are required.

TDC Program

As described in the Periodic Review of 2001, the current LCP contains no policy limiting the quantity of TDC use in any one area. Concerns are raised over the scale of development that should be allowed on any given property versus the property's ability to absorb and drain water. Although surveys have shown buildings that have used TDC's are distributed widely throughout Lodge Hill, there are a few areas where TDC use has been concentrated. The more concentrated the TDC use, the greater the impact may be on water absorption and erosion. Specific standards addressing the location and concentration of TDC receiver sites should be considered.

On major change proposed under the new community plan is an increase in maximum footprint and GSA allowed under Table 7-1. It appears that in each category, the allowable footprint and GSA is increased (with the exception of the GSA for 25' wide lots). Beyond the baseline increases allowed under Table 7-1, the TDC program would allow even more impervious footprint and square footage to be added to residential developments. For example, Table 7-1 increases the maximum footprints allowed by 400 square feet on triple lots (75' wide). Combined with an additional 400 square feet of TDC credit, questions are raised about cumulative impacts and the role of the TDC program. Contrary to the direction taken under the proposed community plan, it may be necessary to revise the allowable development standards downward for small lots in Cambria. The plan does not include the information needed to evaluate whether the proposed standards will effectively carry out the objective of providing maximum protection of water quality and marine resources. In order to address this issue, we suggest a comparative analysis of the impacts to resources posed by the buildout allowed under the existing TDC program, and that under the proposed TDC program.

D. Scenic and Visual Resources (Coastal Act Section 30210, 30251, 30252, and 30253(5))

An important aspect of the plans' conformance to Coastal Act standards will be their ability to protect highly scenic areas and the special character of each community. The applicable Coastal Act policies call for the protection of scenic and visual qualities of coastal areas; the provision and protection of maximum public access, including visual access; and, the preservation of special communities and neighborhoods with unique characteristics that are popular destinations for visitors.

CAMBRIA

Communitywide Standard 9 (A through F) - Development Within View of Highway One (pages 7-17 through 7-18). This standard establishes a suite of guidelines to address new development within view of Highway One. While this standard appears to provide positive steps to minimize visual impacts and landform alterations, this standard should be expanded to include protection of views from other important public viewing areas, such as public beaches, neighborhood parks, and public access trails. We also suggest that the County consider a prohibition on new subdivisions within the Highway One viewshed and other highly scenic areas.

Moonstone Beach Standard 4 (I) Site Coverage – View Corridors Required (page 7-52). The intent of this standard is to maximize view corridors to the shoreline. The existing side setback standard for contiguous lots should not be optional. Given the fact that this standard addresses such a small land area with a limited number of lots, we suggest a more detailed analysis that pinpoints and describes the best size and location of setbacks to maximize the size and extent of view corridors.

E. Hazards (Coastal Act Section 30235)

The Coastal Act requires that new development be sited and designed to minimize risk to life and property specifically in areas of high geologic, flood and fire hazard. Under the Coastal Act, development is required to be sited and designed to assure stability and structural integrity and

neither create nor contribute significantly to erosion or require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs (Section 30253). Section 30235 allows the construction of shoreline protective devices where existing development is threatened from erosion and when designed to eliminate or mitigate impacts on shoreline sand supply.

There are a variety of measures that the County should incorporate into the community plans to avoid or minimize the risks of erosion or wave attack and avoid the need for future shoreline armoring. These are discussed at length in the Periodic Review of 2001 and include in part:

- Defining more specifically what existing structures are for purpose of allowing future shoreline armoring.
- Prohibiting new subdivisions or lot splits or lot legalization that creates new lots in high wave hazard areas.
- Modifying the standards to require as a condition of new development that the applicant assume the risk of building in a hazardous area without assurances that future armoring will be allowed.

The Cambria Community Plan addresses the stability and structural integrity of new development primarily through the use of a residential setback standard. Standard 8.A.1. (page 7-76) requires that all residential lots with a coastal bluff be setback to withstand bluff erosion and wave action for a period of 75 years, and that in any case the setback shall not be less than 25 feet. As discussed in the Periodic Review of 2001, it may be appropriate to change the setback requirement to be based on a 100-year economic life of the development rather than 75 years.

SAN SIMEON ACRES

In San Simeon Acres, there is a minimum bluff setback of 25 feet, which may be required to be greater. However, this setback requirement does not equate to a specific number of years of erosion. Thus, we suggest that Communitywide Standard 2 (page 7-100) be modified to require that structures be setback to withstand bluff erosion and wave action for a period of 75 years (and possibly 100 years), with an absolute minimum setback of 25 feet from the bluff edge.

II. Text Specific Comments

- (page 7-3) - Combining Designations Standard 2 Lateral Access Dedication – Park Hill. This lateral access standard appears missing from the draft Cambria community plan. Is this intentional? If so, why? Is it addressed in a different section of the plan? Or, could it be that the beach area is already in public ownership?
- (page 3-11) – The intro paragraph of this page discusses near term approaches for supplemental water supplies. The paragraph lists desalinization as a near term project in the years “2004 to 2006”. This should be amended, as a 1 year goal for completion of a

desalinization project seems unrealistic.

- (page 6-3) Combining Designations. - Why are Little Pico, Arroyo de La Cruz, and San Carpoforo Creeks omitted? Has their status changed?
- (page 6-17) – Standard 17A. Should passive recreation be listed as “Restoration?” Perhaps better listed as an “Enhancement” goal?
- (page 7-21) – Communitywide Standard 10 East/West Ranch. It is unclear why residential uses (one caretaker residence and residential accessory uses) would be allowed on East/West Ranch.
- (page 7-58) – Standard 5 Tract 226 – There is no Standard 6 as referenced.
- (page 7-59) - Park Hill Lateral Access – Why is this deleted? Is it addressed elsewhere?
- (page 7-66) - RSF Standard 8 Building Size. - Why are Tract 358, Tract 384, Tract 420, tract 44, and Tract 112 excluded from the maximum footprint and GSA requirements of Table 7-1?
- (page 7-66) A. Use of Table. -There is number missing in the allowable GSA calculation. Should read $(1200 \times 1.09 = 1,308)$.
- (page 7-72) Figure. - Notation on Figure 7-24 does not match Figure 7-25 “Fern Canyon” and Figure 7-26 “visible Hillside”

In conclusion, we recognize the significant efforts made by the County to consider a wide variety of interests while protecting valuable coastal resources. Increased population growth and new development pressures, combined with the recognition of limited resources in Cambria and San Simeon, make urban planning within these communities a challenging prospect. We appreciate the opportunity to comment in the development stage of the community plans. As the County moves forward with its review, the issues identified above, as well as any other relevant coastal issues identified upon further analysis, should be considered in light of the provisions of the Coastal Act. We may have more comments as the planning process moves forward. If you have any questions, please do not hesitate to call me at (831) 427-4863.

Sincerely,

Jonathan Bishop
Coastal Program Analyst
Central Coast District Office



SAN LUIS OBISPO COUNTY
DEPARTMENT OF PLANNING AND BUILDING

VICTOR HOLANDA, AICP
DIRECTOR

RECEIVED

DEC 27 2005

CALIFORNIA
COASTAL COMMISSION
CENTRAL COAST AREA

December 22, 2005

Jonathan Bishop, Coastal Program Analyst
California Coastal Commission
725 Front Street Suite 300
Santa Cruz, CA 95060

SUBJECT: Cambria and San Simeon Acres Community Plans of the North Coast Area Plan

Dear Mr. Bishop;

Thank you for your comments on the May 2005 Public Hearing Draft of the Cambria and San Simeon Acres Community Plans of the North Coast Area Plan received November 9, 2005. After several months of consideration, the Planning Commission recommended approval, with recommendations, of the Public Hearing Draft on November 10, 2005.

The Planning Commission's recommendations have been incorporated into the November 2005 Planning Commission Recommended Draft. This draft has been distributed to your office for review. You will find that many of your comments on the May 2005 Public Hearing Draft have been addressed in this Planning Commission Recommended Draft.

It is important to note that the proposed update to the community plans should not be reviewed in a vacuum, but rather as a part of a comprehensive review framework that includes, but is not limited to the County's General Plan, Local Coastal Program (LCP), the California Environmental Quality Act (CEQA), and other laws and regulations. The plan does not authorize development; any proposed development would not only have to be consistent with the plan standards, but would also have to be consistent with all other requirements.

The following are brief responses to the issues raised in your comments on the Public Hearing Draft:

New Development and Public Services – Cambria: The Planning Commission Recommended Draft Plan recognizes resource limitations, including but not limited to water supply, and does not allow for development potential beyond what is allowed under the current plan. In fact, the Planning Commission Recommended Draft includes many programs, policies, and standards to reduce the amount of potential buildout in Cambria from approximately 12,000 to 6,130 dwelling units.

The Cambria Community Services District's (CCSD's) Water Master Plan and other on-going studies provide detailed water information for the area. This information indicates that water supplies are very limited. As such, the Planning Commission Recommended Draft recommends

CCC Exhibit D
(page 12 of 37 pages)

measures to reduce potential buildout to the greatest extent feasible, while still allowing a reasonable use of the land and fulfilling a fundamental goal of the Coastal Act: protection of coastal resources by concentrating new development in existing developed areas able to accommodate it.

Communitywide Standard 1 – Reservation of Service Capacity: The existing standard requires 20% reservation of water and sewer capacity for visitor-serving uses. This would be implemented consistent with how it is implemented currently. The proposed modification to allow for a percentage to be used for affordable housing requires a program to be reviewed and approved. This program would detail how the policy would be implemented and would be reviewed for consistency with Coastal Act policies.

Communitywide Standard 2 – Growth Management and Allocation of Residential Permits: This standard has been modified by the Planning Commission. Please see p. 7-15 of the Planning Commission Recommended Draft. The currently proposed standard does not allow allocations to “stockpile” or “accrue”. Service extensions outside of the USL or URL are only to allow the CCSD to meet current commitments. Finally, determination of “equivalent legal lot” would occur through the discretionary review and environmental review process with consideration of a number of factors, including habitat, development potential and other site characteristics.

Transfer of Development Credits: In addition to Transfer of Development Credits, there are numerous policies, programs, and standards proposed in the plan to address potential impacts to resources. These policies, programs, and standards included, but are not limited to Monterey Pine Forest Habitat standards, Small Lot-Open Space District program, and Santa Rosa Creek standards.

Communitywide Standard C.3 Resale Provision: This standard has been modified by the Planning Commission to include provisions for maximum resource protection. See page 7-73 of the Planning Commission Recommended Draft.

Land Use Changes

- 1) **Cambria CSD #3 Main Street RSF to CR:** The proposed land use designation change does not authorize development. Regardless of land use category designation, development would have the potential to result in impacts. Any proposed development would need to meet requirements regarding parking, flood hazard, geologic hazards, and traffic. The Commercial Retail land use category is more appropriate on than RSF Main Street, in the West Village Commercial District, a visitor-serving area.
- 2) **Connelly and Childs: RMF and OP to RMF and CR:** Again, this land use category change does not authorize development. Section 23.04.092 of the CZLUO applies only to the types of projects detailed in 23.04.092a. The mobile home park would be allowed to remain as a legal non-conforming use. The proposed land use category configuration would retain approximately the same

amount of land in the RMF category while allowing CR uses to be located along Main Street. Through the coastal development permit review process, any proposal for development of the property would be reviewed for consistency with all applicable regulations.

- 3) **Aiken: RS to CS:** The Planning Commission has recommended this remain RS.
- 4) **Kreps/Meltzer: CR to RMF:** Because of lot configuration, ownership patterns, and planning area standards the RMF designation would not result in a significant change in the number of units allowed under the RSF designation. However, the RMF designation would allow and encourage development patterns that may result in units that would typically sell at a lower market rate than standard residential single family development. Further, proposed planning area standards address issues such as access, circulation, design, and maintenance.
- 5) **Newman/Londonderry: RMF to RSF:** The Planning Commission has recommended this remain RMF because many of the lots have already been developed with multiple units.
- 6) **South of Cambria Properties:** The Planning Commission has recommended this 32- acre parcel land use category change proposal be deleted from this effort consistent with the recently approved Coastal Commission LCP amendment.
- 7) **Mid-State Bank: REC to CR:** This site is already developed and flooding potential has been addressed. The proposed change is simply to make the land use category consistent with approved development. Further, the visitor-serving designation is not removed from the site. The V symbol is moved to the West Village area on the map to more generally indicate that the visitor-serving designation applies to all CR and REC land use categories along Main Street rather than appearing to apply to a single property.

San Simeon Acres CR to RMF: Most of the land within San Simeon Acres is in the CR land use category. The vast majority of employment in San Simeon Acres is in the visitor-serving, service sector industry, resulting in a large need for multi-family housing. The proposed land use category changes are to help meet this need.

Environmentally Sensitive Habitat Areas: Please note that the proposed Estero Area Plan update includes amendments to the definition of ESHA in the CZLUO. These changes, if approved, would be affective Coastal Zone-wide and therefore have not been duplicated in this proposed update.

The “list of standards” and “mitigation measures” would be reviewed for adequacy on a project by project basis. For example, for a specific development on a specific property, the standards for construction practices and vegetation replacement may be determined through the coastal

development permit and environmental review process to be adequate. While, because of the characteristics of another project, the standards may be determined to not be adequate and additional mitigation measures applied through the development and environmental review process.

Monterey Pine Forest Combining Designation Standard: Please see Communitywide Standard #5 on page 7-17 of the Planning Commission Recommended Draft. This standard for site review is located in the Communitywide section because it applies to the entire community, not just properties with the ESHA designation.

Combining Designation Standard 8 – Clustering of Development Required: This is a Monterey Pine Forest Habitat (SRA) (TH) standard and requires certain types of development proposed on a property within a TH to be clustered and restricted to slopes less than 20 percent in order to reduce impacts on the Monterey pine forest habitat. The Board of Supervisors may consider changing “forested areas” to “the Monterey pine forest habitat” through their review of the Planning Commission Recommended Draft.

Communitywide Standard 8 Santa Rosa Creek Frontage: Lighting and noise impacts would be addressed through coastal development permit and environmental review.

Water Quality and Marine Resources: The Planning Commission Recommended Draft includes numerous programs, policies, and standards to protect water quality and marine resources. Proposed development would not only have to be consistent with the area plan standards, but would also have to be consistent with all other requirements of the LCP and CEQA. While the proposed Combining Designation Standard 1 would include specific requirements for projects with point source discharges, these projects would also be subject to biological studies, monitoring, and numerous other requirements.

Water Quality and Marine Resources - Cambria: CZLUO Sections 23.05.042 through 23.05.050 provide standards for the control of drainage and drainage facilities to minimize effects of runoff and resulting inundation and erosion. These standards were updated in 2004 and address ongoing runoff from all development. The erosion control standards included in the RSF section are existing standards originally written specifically for issues related to the Lodge Hill area. The Board of Supervisors may consider deleting these standards so it would be clear that development is subject to the recently updated requirements of CZLUO Sections 23.05.042 through 23.05.050, leave the standards as proposed, or revise them so they apply areawide.

TDC Program: Please note that only the maximum allowable footprint is proposed to increase, not GSA. Maximum allowable GSA would stay the same as in the current Table G. The proposal to increase the maximum allowable footprint is in response to community concern over the massive, boxy appearance of homes and the need for more single story living by the community’s residents, many of whom are elderly. Again, please note that all development is subject to the numerous policies, programs, and standards of the LCP that protect water quality and marine resources.

Scenic and Visual Resources: The Planning Commission Recommended Draft includes many policies, programs, and standards to protect the scenic and visual qualities of the coastal areas, provide and protect public access, and preserve special communities and neighborhoods.

Cambria Communitywide Standard 9 – Development within View of Highway One: Proposed development would not only have to be consistent with the area plan standards, but would also have to be consistent with all other requirements of the LCP and CEQA which include requirements for the protection of visual resources. These standards were developed specifically for Highway One through the review of many development proposals along this corridor. The County has developed effective requirements previously applied on a project by project basis into standards. Protection of views from development proposed in other areas would also be evaluated on a project by project basis and appropriate view protection measures would be applied. Cambria is already subdivided, mainly into small, substandard lots. A prohibition on new subdivisions would not significantly affect view protection.

Moonstone Beach Standard 4 – View Corridors Required: This is an existing standard. Many of the lots are developed and the flexible standard allows application to be based on specific proposals (remodel, demolition and replacement, addition, etc) and site characteristics.

Hazards: Development is subject to the requirements of the LCP regarding hazards. Proposed shoreline protective devices are also subject to the requirements of the LCP. Further, the Planning Commission Recommended Draft includes a program to address shoreline erosion and bluff management. This program includes a plan that focuses on annual bluff erosion rates and sand supply; bluff retreat and setbacks; emergency armoring procedures; and shoreline protection structure design, engineering, monitoring, and maintenance.

San Simeon Acres Communitywide Standard 2: This standard has been modified by the Planning Commission. See page 7-100 of the Planning Commission Recommended Draft.

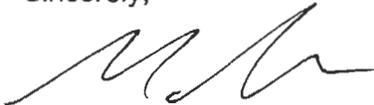
Text Specific Comments:

- **Combining Designations Standard 2 Lateral Access Dedication – Park Hill.** This standard is proposed for deletion as it is redundant with requirements of CZLUO Section 23.04.420 Coastal Access Required.
- **P.3-11.** Comment noted. The Board of Supervisors may consider a revised completion goal.
- **P. 6-3. Combining Designations.** Please see page 6-3 of the Planning Commission Recommended Draft.
- **P. 6-17 – Standard 17A.** It's unlikely that this distinction is of much consequence since the list refers to things the 'to be prepared' Creek Enhancement Plan may include. The plan may identify an appropriate level of passive recreation use that is consistent with the restoration efforts.

- **P. 7-21 – Communitywide Standard 10 East/West Ranch.** The caretaker residence and residential accessory uses would be to house a caretaker employed on the site for security and maintenance purposes.
- **P. 7-58. Standard 5 Tract 226.** Please see page 7-59 of the Planning Commission Recommended Draft.
- **7-59. Park Hill Lateral Access.** This standard is proposed for deletion as it is redundant with requirements of CZLUO Section 23.04.420 Coastal Access Required.
- **P. 7-66. RSF Standard 8 Building Size.** These are large lot subdivisions that do not have the lot size limitations of properties within the small lot subdivisions.
- **P. 7-66. A. Use of Table.** Please see page 7-66 of the Planning Commission Recommended Draft.
- **P. 7-72 Figure.** Please see page 7-71 and 7-72 of the Planning Commission Recommended Draft.

Thank you for your comments on the Public Hearing Draft. Please use this information in review of the Planning Commission Recommended Draft. We look forward to receiving comments on the Planning Commission Recommended Draft prior to the beginning of public hearings with the Board of Supervisors. These hearings are tentatively scheduled to begin on February 28, 2006. Please contact me at (805) 781-4576 should you have any questions or concerns.

Sincerely,



Martha Neder, AICP, Planner
Department of Planning and Building

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March 14, 2006

San Luis Obispo County Board of Supervisors
 c/o Katcho Achadjian, Chair
 County Government Center, Rm. D-430
 San Luis Obispo, CA 93408

Subject: *Cambria and San Simeon Acres Community Plans (November 2005 Draft)*

Dear Honorable Supervisors:

The Coastal Commission staff would like to take this opportunity to provide comments on the November 2005 draft Cambria and San Simeon Acres Community Plans (the Plans). As you know, the Plans propose numerous changes to the North Coast Area Plan portion of the Land Use Plan (LUP) and the Coastal Zone Land Use Ordinance (CZLUO) of the certified Local Coastal Program (LCP). If the Board of Supervisors approves the Plans, they will next be submitted by the County as an LCP amendment request to the Coastal Commission. It is important, therefore, that the changes proposed by the Plans be understood within the context of the Coastal Act and the resource protection requirements of the existing LCP.

Overall, we are pleased with many of the changes that were made to the May 2005 draft as a result of our initial comments to the Planning Commission. We also appreciate the efforts of the County Planning Department staff for their time and effort to discuss and clarify outstanding issues with Coastal Commission staff. Nonetheless, we continue to have concerns and questions that we urge you to address before submitting the Plans to the Coastal Commission. Towards this end, we offer the following comments. We apologize for sending this letter the day of the hearing. We feel this is an important update to the LCP and we are willing to work with you and your staff before and after you take action on this item.

A. Visitor and Recreational Opportunities (Coastal Act Sections 30213, 30222, and 30223)

The Coastal Act requires that lower cost visitor and recreational facilities be protected, encouraged, and where feasible, provided. Developments providing public recreational opportunities are preferred. The Act also requires that visitor-serving commercial recreational facilities have priority over other land uses on suitable sites and that upland areas to support recreational uses be so reserved for those uses.

Communitywide Standard 1 – Reservation of Service Capacity (page 7-15). Standard 1.A. reserves on a yearly basis 20% of the sewer and water capacity to visitor-serving and commercial uses. An amount not to exceed 25% of the Visitor-Serving reservation may be allocated to affordable housing projects. Thus, this policy guarantees only a minimum of 15% of capacity to visitor-serving and commercial uses. In order for the Commission staff to be able to recommend that the Commission certify this element of the plan, it must be accompanied by additional information that demonstrates consistency with Coastal Act Sections 30213, 30222, and 30223. Specifically, we would need to see that the current and projected water and sewer use percentage of the visitor and commercial sector is no more than approximately 15%. Further questions are raised regarding implementation of the new standard. Standard 1B relies on the 2006 Exhibit D

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“propose” to the County a program to implement this standard. We suggest that prior to approval of any such standard, that the CCSD “program” be reviewed and approved by the County and incorporated into the LCP amendment submittal.

San Simeon Acres Land Use Changes

There are four land use changes proposed in San Simeon Acres. The first would appropriately designate the wastewater treatment plant as a Public Facility (PF)¹. For three properties (Ramey - 2.2 acres; Sansone - 2 acres; and Sansone - Vista Del Mar - .52 acres) the land use designation would be changed from Commercial Retail (CR) to Residential Multi-Family (RMF). Under the proposed plan, approximately 5 acres of commercial retail area in San Simeon Acres would be changed to residential uses. These land use changes must be consistent with the Coastal Act, giving visitor serving and recreational uses priority over residential uses, especially lower cost visitor serving uses. San Simeon Acres is a largely visitor-serving destination area and maintaining land for visitor-serving, commercial, and recreational uses is important. In a recent letter, County Planning Department staff indicated that this land use designation change is necessary to provide for service-sector type housing.

With regard to the .52-acre Sansone property west of Highway One, we question the likelihood that it would be developed to provide low-cost housing to service-sector laborers. Furthermore, given its location west of Highway One with ocean views and in close proximity to the beach, it appears to be a most suitable site for visitor-serving commercial recreation. Given that the Coastal Act assigns priority to that use, we recommend that this site remain under the Commercial Retail designation.

With regard to the other Sansone site and the Ramey site, in order for the Commission staff to be able to recommend that the Commission certify this element of the plan, it must be accompanied by additional information that demonstrates consistency with Coastal Act Sections 30213, 30222, and 30223. Specifically, we would need to see that the current and projected demand for visitor-serving uses can be accommodated elsewhere in San Simeon Acres without the need for these two sites before we could recommend approval. Even if it could, options to allow one or both of the sites to have some visitor-oriented uses in the future should not be completely eliminated.

B. New Development and Public Services (Coastal Act Section 30250)

The Coastal Act includes policies that address the location, type, and intensity of new development to ensure the protection of coastal resources. Overall, these requirements reflect a fundamental goal of the Coastal Act: protection of coastal resources by concentrating new development in existing developed areas able to accommodate it.

Chapter 3 (Services and Resources) of the Plan concedes that sustainable water supplies in Cambria, particularly during low rain years, are likely inadequate. We continue to encourage the County not to permit any new development until critical studies regarding current water

¹ The PF designation appropriately reflects the current use of the site for wastewater treatment. However, the long-term use of the site for this purpose may be threatened by coastal erosion, which may give rise to the need to consider alternative designations in the future.

constraints, such as instream flow studies for San Simeon and Santa Rosa Creeks, have been completed. Cambria Service Program 11 (page 3-43) attempts to address this issue, but the program is non-binding with an “on-going” timetable for completion. A more protective approach should be examined for Cambria that requires time-certain completion of instream flow studies and other performance standards, coupled with development restrictions for non-completion. This is the approach currently required for San Simeon Acres under the proposed Plan and should be seriously considered for Cambria as well (see San Simeon Communitywide Standard 1C, page 7-99).

Communitywide Standard 2 A-C (page 7-14 through 7-17). The Plan proposes a suite of new development standards designed to establish how future residential growth would occur in Cambria. Standard 2A prohibits the County from any Maximum Annual Allocation until the CCSD water moratorium is lifted. A maximum number of 125 residential permits per year is allowed under the standard. In order to find Communitywide Standards 2.A consistent with the Coastal Act, no new water allocations and residential permits should be issued until the water moratorium is lifted **and** all of the performance standards regarding Cambria water supplies, as described and adopted by the Coastal Commission in the North Coast Area Plan Update of 1998 and the Periodic Review of 2001, are met to the satisfaction of the County and Coastal Commission.

Section 2.B. of this proposed standard allows the CCSD to provide services outside of the USL or URL under certain circumstances. The overriding concern with this standard is the potential for new development to occur outside of existing developed areas and further weaken the “hard edge” of the urban area. The plan should more fully address the cumulative effects of the standard on Cambria’s service capacities and natural landscape. We continue to request from the County a basis for the exception categories including a detailed mapping and inventory of the specific sites that are believed fall into the exception categories listed in the standard.

Section 2.C. requires that new residential land divisions retire an “equivalent legal building site.” While this new standard appears to be a positive step in eliminating additional lots through land divisions, the term “equivalent legal building site” needs to be better defined. It should be clear that this means not only an equivalent number of sites, but that the building site proposed for retirement should also be equivalent in terms of actual development potential. The retirement of “equivalent building sites” under this provision should consider factors such as the presence of ESHA, steep slopes, scenic views, or other development constraints to ensure an equitable retirement. Retiring lots that are already unbuildable, or are not comparable in terms of development potential, does little to effectively avoid new development impacts and ensure adequate service capacities consistent with the Coastal Act. Moreover, while the proposed lot retirement approach for new subdivisions will help prevent existing water constraints from getting worse, it does nothing to solve the problem. For this reason, we would encourage the County to consider applying such an approach to the buildout of existing lots of record, and to prohibit new subdivisions until a sustainable source of water is available.

Cambria Land Use Changes

The community plans propose modifications to existing land use designations that will change the type, location, and intensity of development in the urban areas of Cambria. We appreciate

the letter from County Planning staff regarding the Planning Commissions actions on certain proposals. We made previous comments regarding the County proposal to change the 4-acre Kreps/Meltzer site from Commercial Retail (CR) to Residential Multi-Family (RMF). Our previous comments were based on findings made in the 1998 North Coast Area Plan update, which concluded that a more suitable designation for the site would be Residential Single-Family (RSF). The 1998 NCAP update found that if the site were zoned RSF, the property could be developed with 33 units with about 71 persons, compared to 104 units and 225 persons that RMF zoning could potentially allow. The greater density may be appropriate if no other site constraints are identified of the property (e.g. ESHA) and services become available.

C. Environmentally Sensitive Habitat Areas (ESHA's) (Coastal Act Sections 30240, 30230, 30231, and 30250a)

One of the primary objectives of the Coastal Act is to preserve, protect, and enhance environmentally sensitive habitat areas (ESHA). In both Cambria and San Simeon Acres ESHA's are abundant. Identified ESHA areas include: marine habitats, streams and riparian habitats, wetlands, and terrestrial habitats.

As discussed in both the 1998 NCAP update and the Periodic Review of 2001, the Combining Designation maps do not effectively delineate all locations of potential ESHA, and therefore should not be relied upon to identify ESHA's and the particular areas where biological evaluations are needed. The LCP definition of ESHA should be revised to conform to Coastal Act section 30107.5. It should also be clarified that application of the ESHA protection standards is not limited to the areas mapped as Combining Designations (Rec. 4.1 p.124). In a recent letter, County Planning staff explained that this issue will be addressed through the Estero Area Plan update. Given the amount of time that may pass before the Estero Area Plan update is certified, the abundance of ESHA's subject to the development standards under the current Plans, and the fact that these same LCP sections are currently being proposed for changes, we continue to feel that this issue should be addressed now, rather than waiting for a future LCP amendment review and approval.

We continue to have concerns about the way in which the Plan identifies ESHA areas and determines when a biological report is required. The Periodic Review also recommends updating the requirements for biological investigations and reports. CZLUO Section 23.07.170 should be revised so that biological reports are prepared for all development within or adjacent to ESHA and not just those sites that have been mapped as ESHA.

The submittal appears to weaken the application content requirements of CZLUO Section 23.07.170(a) requiring biological reports by adding the following language:

a. Application content. Unless a comprehensive program or list of standards already exists, and mitigation measures have already been identified that will reduce potential impacts to less than significant levels, and the proposed project will incorporate all feasible mitigation measures, a land use permit application for a project on a site located within and adjacent to an Environmentally Sensitive Habitat shall also include a report by a biologist approved by the Environmental Coordinator that:...

It is unclear if the “list of standards” and “mitigation measures” would be adequate to protect ESHA consistent with the LCP and Coastal Act. Even if this issue is reviewed on a case-by-case basis, as described in recent correspondences with County Planning staff, questions arise about how these lists or mitigation measures will be established and how would they be evaluated. It is also unclear if this new language addresses new information and changes to habitat areas over time. It seems possible that the lists of standards and mitigation measures may not have the benefit of advanced review by the Environmental Coordinator, or reflect current on the ground conditions or changed circumstances. It seems that these measures should be established with the benefit of a biological report, rather than having an existing list or set of standards dictate the need for qualified biological review.

Monterey pine forest (SRA) (TH) Combining Designation Standard (page 7-7 through 7-11). Although this standard attempts to reduce redundancy and provide consistency in the planning process, Section 2.B. still relies on CZLUO Section 23.07.170 to determine where a biological report is required. As discussed above, biological reports should be prepared for all development that may be within or adjacent to ESHA, not just those areas mapped in the LCP.

Site Review - Communitywide Standard 5 (page 7-17). This standard relies on a determination as to whether or not a project triggers “discretionary review” before a biological assessment is required. When a biological assessment is required, the standard relies on CZLUO Section 23.07.170. First, we note that all coastal development permits are discretionary. Second, with the changes to CZLUO 23.07.170 discussed above, this standard may not adequately identify and protect all ESHA areas. We also note that this standard is not binding due to the inclusion of the term “may” in the last sentence. The County should consider ways to strengthen the requirements for biological assessments for all coastal development permits based on actual “on the ground” characteristics.

Combining Designation Areawide Standard 8 – Clustering of Development Required. This standard requires clustering for new land divisions and multi-family residential projects within forested areas. The standard limits, when feasible, new development to slopes less than 20%. For this standard to be effective, the term “forested areas” needs to be better defined. It is unclear if this term is an ESHA designation or not. If so, this standard raises consistency issues with Coastal Act policies that limit new developments in ESHA to resource dependent uses. We encourage the Board to consider adding clarifying language to avoid conflicts with other ESHA protection standards in the LCP.

C. Water Quality and Marine Resources (Coastal Act Section 30230 – 30231)

The Coastal Act includes numerous policies to protect water quality and marine resources. Marine resources are to be protected, maintained, and where feasible, restored. The biological productivity of coastal waters, including streams, estuaries and wetlands, must be maintained. Requirements include controlling runoff and waste discharges to protect water quality, maintaining groundwater supplies and stream flows in order to sustain the biological productivity of coastal waters, and minimizing the alteration of riparian habitats and streams.

The proposed plan updates water quality standards for Single-Family Residential development but does not include similar update standards to Multi-Family Residential and Commercial development categories. For example, Residential Single Family Standards 4 and 5 address topographic issues and erosion control measures, but the proposed amendment does not apply these measures to other land use designations. As discussed in the Periodic Review of 2001, one of the main areas where the LCP needs to be updated is in addressing ongoing runoff from all development. The amendment should incorporate measures to address ongoing nonpoint source pollution, regardless of location, type or size of the development. In addition, specific performance standards to ensure that water quality is adequately protected should be included when erosion control and drainage plans are required. As considered by County Planning staff in a recent letter, we would support applying these standards areawide.

TDC Program

As described in the Periodic Review of 2001, the current LCP contains no policy limiting the quantity of TDC use in any one area. Concerns are raised over the scale of development that should be allowed on any given property versus the property's ability to absorb and drain water. A recent erosion and sedimentation study by the Natural Resources Conservation Service in the Lodge Hill area of Cambria identified impacts of runoff in developed areas. The findings from the study indicate that residential development and road construction have led to increased runoff from the impervious surfaces, resulting in a higher rate and volume of runoff, and possible changes in flow patterns and rates of sedimentation into streams. The study notes that forested areas play an important role in increasing water infiltration, and reducing runoff velocities.

Residential Single-Family Standard 7.C(4) (page 7-75). Although surveys have shown buildings that have used TDC's are distributed widely throughout Lodge Hill, there are a few areas where TDC use has been concentrated. The more concentrated the TDC use, the greater the impact may be on water absorption and erosion. While new Residential Single-Family 7.C(4) addresses criteria for using TDC's, we continue to encourage the inclusion of more specific standards addressing the location and concentration of TDC receiver sites.

Table 7-1 Standards for Building Sites (page 7-68). One major change proposed under the new community plan is an increase in maximum footprint and GSA for residential projects allowed under new Table 7-1. Beyond the baseline increases allowed under Table 7-1, the TDC program would allow even more impervious footprint and square footage to be added to residential developments. For example, Table 7-1 increases the maximum footprints allowed by 400 square feet on triple lots (75' wide). Combined with an additional 400 square feet of TDC credit, questions are raised about cumulative impacts and the role of the TDC program. Contrary to the direction taken under the proposed community plan, Commission staff feels it may be necessary to revise the allowable development standards downward for small lots in Cambria. This would match the recommendations made most recently in the 2001 Periodic Review. As detailed in the 2001 Periodic Review Recommendation 2.18, one idea for the County to consider is a standard to address the minimum area of native landscape that must be preserved on a site, regardless of lot size and the ability to transfer development credits.

The proposed Plan (including the EIR) does not contain the information needed to evaluate whether Table 7-1 standards will effectively carry out the objective of providing maximum

protection of water quality and marine resources. The current Plan relies on existing LCP standards for drainage and erosion control plans to be evaluated on a project-by-project basis. The 2001 Periodic Review found that the County's drainage plans might not be sufficient to fully protect water quality and marine resources. For these reasons, we continue to request that the County perform a cumulative analysis of the impacts to water quality and erosion, particularly in Lodge Hill, posed by new Table 7-1 and the proposed TDC program.

D. Scenic and Visual Resources (Coastal Act Section 30210, 30251, 30252, and 30253(5))

An important aspect of the plans' conformance to Coastal Act standards will be their ability to protect highly scenic areas and the special character of each community. The applicable Coastal Act policies call for the protection of scenic and visual qualities of coastal areas; the provision and protection of maximum public access, including visual access; and, the preservation of special communities and neighborhoods with unique characteristics that are popular destinations for visitors. One important area is along Moonstone Beach Drive. We continue to have concerns regarding Standard 4(I) related to site coverage.

Moonstone Beach Standard 4 (I) Site Coverage – View Corridors Required (page 7-52). The intent of this standard is to maximize view corridors to the shoreline. The existing side setback standard for contiguous lots should not be optional, as currently proposed. Given the fact that this standard addresses such a small land area with a limited number of lots, we continue to suggest a more detailed analysis that pinpoints and describes the best size and location of setbacks to maximize the size and extent of view corridors along this important stretch of Moonstone Beach.

E. Hazards (Coastal Act Section 30235)

The Coastal Act requires that new development be sited and designed to minimize risk to life and property specifically in areas of high geologic, flood and fire hazard. Under the Coastal Act, development is required to be sited and designed to assure stability and structural integrity and neither create nor contribute significantly to erosion or require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs (Section 30253). Section 30235 allows the construction of shoreline protective devices where existing development is threatened from erosion and when designed to eliminate or mitigate impacts on shoreline sand supply.

The following comments were previously made to the County Planning Commission. Based on our review of the November 2005 draft, it does not appear that additional standards have been incorporated in the Plan. Commission staff feels that these are important issues worthy of additional consideration.

There are a variety of measures that the County should incorporate into the community plans to avoid or minimize the risks of erosion or wave attack and avoid the need for future shoreline armoring. These are discussed at length in the Periodic Review of 2001 and include in part:

- Defining more specifically what existing structures are for purpose of allowing future shoreline armoring.

- Prohibiting new subdivisions or lot splits or lot legalization that creates new lots in high wave hazard areas.
- Modifying the standards to require as a condition of new development that the applicant assume the risk of building in a hazardous area without assurances that future armoring will be allowed.
- A comprehensive area wide approach to minimizing shoreline armoring, and to avoid and mitigate the adverse impacts of existing and future seawalls, in existing developed shoreline areas.

More specifically, the Cambria Community Plan addresses the stability and structural integrity of new development primarily through the use of a residential setback standard. Standard 8.A.1. (page 7-76) requires that all residential lots with a coastal bluff be setback to withstand bluff erosion and wave action for a period of 75 years, and that in any case the setback shall not be less than 25 feet. As discussed in the Periodic Review of 2001, it may be appropriate to change the setback requirement to be based on a 100-year economic life of the development rather than 75 years.

Thank you for the opportunity to provide comments on this important Plan. As the County moves forward with its review, the issues identified above, as well as any other relevant coastal issues identified upon further analysis, should be considered in light of the provisions of the Coastal Act. If you have any questions, please do not hesitate to call me at (831) 427-4863.

Sincerely,



Jonathan Bishop
Coastal Program Analyst
Central Coast District Office

CALIFORNIA COASTAL COMMISSION

CENTRAL COAST DISTRICT OFFICE
725 FRONT STREET, SUITE 300
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**June 14, 2006**

Martha Neder
San Luis Obispo County Department of Planning and Building
County Government Center
San Luis Obispo, CA 93408

**Subject: Additional Information Needed to Process Local Coastal Program Amendment
SLO-MAJ-1-06 (Cambria and San Simeon Acres Community Plans)**

Dear Ms. Neder:

We have received the above referenced Local Coastal Program Amendment (LCPA) submittal. Section 13552 of the California Code of Regulations requires LCPA submittals to include information, at a sufficient level of detail, to allow the Commission to evaluate the amendment's conformance to Chapter 3 of the Coastal Act and its relationship to other components of the LCP.

The LCP Amendment Submittal 1-06 consists of the following two parts:

- Part 1: Amend the North Coast Area Plan to incorporate the Cambria and San Simeon Acres Community Plans; revise and move standards from the Cambria Design Plan into the North Coast Area Plan; modify guidelines related to lighting and the Moonstone Beach Drive streetscape; and amend the Coastal Zone Land Use Ordinance (CZLUO), Title 23 Sections 23.05.050 and 23.06.100 regarding water quality and drainage, Section 23.05.062 regarding tree removal, Section 23.07.170 regarding development within or adjacent to environmentally sensitive habitat areas (ESHA), and Section 23.07.172 regarding mineral extraction in wetlands.
- Part 2: Amend the North Coast Area Plan and the Official Maps of the LCP so that the planning area standards and the land use category related to the Fiscalini Ranch property are consistent with the conservation easement and management plan.

Please respond to the following questions and information needs in order to satisfy the requirements of the California Code of Regulations Section 13552 and enable the amendment submittal to be filed as complete.

A. Visitor Serving and Recreational Opportunities (Coastal Act Sections 30213, 30222, and 30223)

The Coastal Act requires that lower cost visitor and recreational facilities be protected, encouraged, and where feasible, provided. Developments providing public recreational opportunities are preferred. The Coastal Act also requires that visitor-serving commercial recreational facilities have priority over other land uses on suitable sites and upland areas to support recreational uses be so reserved for those uses.

COC Exhibit D
(page 26 of 37 pages)

Communitywide Standard 1 – Reservation of Service Capacity (page 7-15). Standard 1.A. reserves on a yearly basis 20% of the sewer and water capacity to visitor-serving and commercial uses. How is this standard currently implemented? Under the proposed amendment, an amount not to exceed 25% of the Visitor-Serving reservation may be allocated to affordable housing projects. Thus, this policy guarantees only a minimum of 15% of capacity to visitor-serving and commercial uses. To demonstrate consistency with Coastal Act Sections 30213, 30222, and 32023, please address how the proposed change will impact new and existing visitor-serving uses. For example, please identify the percentage of the water supply currently dedicated to visitor-serving and commercial uses, and evaluate whether the reservation of 15% of existing water supplies will be adequate to meet the water needs of existing and projected visitor-serving uses. As part of this evaluation, please approximate the type and amount of new visitor-serving and commercial development allowed by the plan, and compare the amount of water required to accommodate such development with the amount of water reserved for such uses by the plan.

In addition, please explain how the CCSD “program” proposed under Standard 1B (page 7-15) will be implemented. Does the program need to be reviewed and approved by the County prior to implementation, or simply submitted by the CCSD? Will the proposed affordable housing program be incorporated into the LCP through a future LCP amendment submittal?

San Simeon Acres Land Use Changes. For three properties (Ramey - 2.2 acres; Sansone - 2 acres; and Sansone - Vista Del Mar - .52 acres) the land use designation would be changed from Commercial Retail (CR) to Residential Multi-Family (RMF). As a result, approximately 5 acres of commercial retail area in San Simeon Acres would be lost to residential uses. To allow for a meaningful analysis of this proposal’s consistency with Coastal Act Sections 30213, 30222, and 32023, more information is needed. Please describe the existing development of these sites, including the type, location, and intensity of current use for each, along with a description of the existing development’s permit history. In addition, please provide evidence that the current and projected demand for visitor-serving uses can be accommodated elsewhere in San Simeon Acres without the need for these three sites. In past correspondences, you indicated that there is a “large need for multi-family housing” to serve service sector employees. Please provide the information and data used in support of this contention.

Recreation Standard 3 – Limitation on Use (page 7-52). Please describe the need for a Caretaker’s Residence in the Recreation land use category. Is such a residence contemplated in the Fiscalini property easement and management plan referenced in Part 2 of this amendment? What criteria would be used to determine the siting, design, and location of such a facility?

B. New Development and Public Services (Coastal Act Section 30250)

The Coastal Act includes policies that address the location, type, and intensity of new development to ensure the protection of coastal resources. Overall, these requirements reflect a fundamental goal of the Coastal Act: protection of coastal resources by concentrating new development in existing developed areas able to accommodate it.

Water Master Plan for Cambria Program 11 (page 3-43). This program is non-binding with an “on-going” timetable for completion. As discussed in previous letters, we feel a more protective approach should be examined for Cambria that requires time-certain completion of previously

identified performance standards, coupled with development restrictions for non-completion. Please describe the current status of the three tasks listed under this program (i.e. in-stream flow management study, water management strategy, and small lot reduction ballot measure).

Communitywide Standard 2 - Limitation on Residential Construction (page 7-15). This standard allows a maximum number of 125 residential permits to be issued per year and cross-references conditions of an EPA sewer treatment facility expansion permit. What is the basis for this growth limit given the fact that there is currently a development moratorium in place? Is there adequate public service capacities, including water storage and delivery systems, currently in place to support this level of development? Part of the existing standard is retained and other parts are removed. What effect will removing the implementation portion of this existing condition have on the standard? Please provide a copy of the EPA permit including the findings and conditions of approval.

Communitywide Standard 3 - Cambria CSD Service Extensions Outside the USL or URL (page 7-16). This standard allows the CCSD to provide services outside of the USL or URL under certain circumstances. Please describe the basis for the exception categories. For example, what is the significance of the May 13, 1997 date and the four exceptions that follow? To adequately analyze this new standard for Coastal Act consistency, please include a detailed mapping and inventory of the specific sites that are believed fall into the exception categories listed in the standard.

Communitywide Standard 5 – New Residential Land Divisions (page 7-16). This standard requires that new residential land divisions retire an “equivalent legal building site.” Please define the term “equivalent legal building site” used in this new standard. Does the term under this provision consider factors such as the presence of ESHA, steep slopes, scenic views, or other development constraints? How does the standard address retiring lots that are not currently buildable or are not comparable in terms of development potential?

Communitywide Standard 7 – Cambria Fire Department Review (page 7-17). Please provide a copy of all applicable state and local Cambria fire codes (including any local amendments or additions thereto).

Cambria Land Use Changes.

We note that Cambria Land Use and Combining Designation maps 8, 9, and 10 (dated July 2004) do not accurately reflect recent changes made through other LCP amendments. In particular, LCPA 1-04 Part 2 changed the land use category for the 32-acre South of Cambria property (11.b in map legend) from Residential Suburban (RS) to Open Space (OS). In addition, the location of the USL/URL has changed. Please provide updated maps reflecting these changes.

C. Environmentally Sensitive Habitat Areas (ESHA's) (Coastal Act Sections 30240, 30230, 30231, and 30250a)

One of the primary objectives of the Coastal Act is to preserve, protect, and enhance environmentally sensitive habitat areas (ESHA). In both Cambria and San Simeon Acres

ESHA's are abundant. Identified ESHA areas include: marine habitats, streams and riparian habitats, wetlands, and terrestrial habitats.

The submittal amends the application content requirements of CZLUO Section 23.07.170(a) requiring biological reports by adding the following language:

a. Application content. Unless a comprehensive program or list of standards already exists, and mitigation measures have already been identified that will reduce potential impacts to less than significant levels, and the proposed project will incorporate all feasible mitigation measures, a land use permit application for a project on a site located within and adjacent to an Environmentally Sensitive Habitat shall also include a report by a biologist approved by the Environmental Coordinator that:...

Please explain what is meant by, and define, the three terms "a comprehensive program," "list of standards," and "mitigation measures" used in this new ordinance. What process will be used to evaluate whether these items adequately protect ESHA consistent with the LCP and Coastal Act? How will these programs, lists, or mitigation measures be established and how would they be evaluated? How will the revised standard enable decision makers to address new information and changes to habitat areas over time?

Monterey pine forest (SRA) (TH) Combining Designation Standard (page 7-7 through 7-11). How is the "project limit area" established? What is the scientific basis for only identifying and requiring mitigation for Monterey pine trees with a diameter six inches or more and 4.5 feet above ground? Do smaller trees (pine saplings for example) require identification and mitigation under the proposed standard? Would tree removal outside of the "project limit area" be allowed for fire protection? How will the impacts associated with necessary fire protection measures be identified and measured? How are impacts evaluated for loss/disturbance to smaller trees and understory vegetation?

How will this proposed standard meet the Coastal Act requirement to avoid Monterey pine forest ESHA?

Site Review - Communitywide Standard 5 (page 7-17). This standard relies on a determination as to whether or not a project triggers "discretionary review" before a biological assessment is required. How is the term "discretionary review" applied by the County in conjunction with its review and processing of coastal development permits?

Combining Designation Areawide Standard 8 – Clustering of Development Required. This standard requires clustering for new land divisions and multi-family residential projects within forested areas. Please define the term "forested areas". Is this term to be used in making an ESHA designation or not? How is this new standard consistent with LCP and Coastal Act policies that limit new developments in ESHA to resource dependent uses?

C. Water Quality and Marine Resources (Coastal Act Section 30230 – 30231)

The Coastal Act includes numerous policies to protect water quality and marine resources. Marine resources are to be protected, maintained, and where feasible, restored. The biological

productivity of coastal waters, including streams, estuaries and wetlands, must be maintained. Requirements include controlling runoff and waste discharges to protect water quality, maintaining groundwater supplies and stream flows in order to sustain the biological productivity of coastal waters, and minimizing the alteration of riparian habitats and streams.

Table 7-1 Standards for Building Sites (page 7-68). One major change proposed under the new community plan is an increase in maximum footprint and GSA for residential projects allowed under new Table 7-1. Beyond the baseline increases allowed under Table 7-1, the TDC program would allow even more impervious footprint and square footage to be added to residential developments. For example, Table 7-1 increases the maximum footprints allowed by 400 square feet on triple lots (75' wide). Combined with an additional 400 square feet of TDC credit, questions are raised about cumulative impacts and the role of the TDC program. The proposed Plan (including the EIR) does not contain the information needed to evaluate whether Table 7-1 standards will effectively carry out the objective of providing maximum protection of water quality and marine resources. The current Plan relies on existing LCP standards for drainage and erosion control plans to be evaluated on a project-by-project basis. The 2001 Periodic Review found that the County's drainage plans might not be sufficient to fully protect water quality and marine resources. For these reasons, we continue to request that the County provide a cumulative analysis of the impacts to water quality and erosion, particularly in Lodge Hill, posed by new Table 7-1 and the proposed TDC program.

Combining Designation Standards Marine Habitat (SRA) – Projects with Point-Source Discharges (page. 7-5). This new standard prohibits surface point-source discharges into the marine environment with certain exceptions. To assure consistency with Coastal Act Sections 30230 and 30231 more information is needed. Please identify the type and location of existing surface discharges within the planning area. Please provide a copy of the relevant MBNMS provisions cross-referenced in section 1(A) of this standard. For passthrough discharges (1(C)), seawater passthrough devices (1(D)), and water quality enhancement discharges (1(E)), please provide copies of all regulations from the other agencies cross-referenced in this standard (i.e. MBNMS, EPA, RWQCB, CDF&G and USFWS).

D. Scenic and Visual Resources (Coastal Act Section 30210, 30251, 30252, and 30253(5))

An important aspect of the plans' conformance to Coastal Act standards will be their ability to protect highly scenic areas and the special character of each community. The applicable Coastal Act policies call for the protection of scenic and visual qualities of coastal areas; the provision and protection of maximum public access, including visual access; and, the preservation of special communities and neighborhoods with unique characteristics that are popular destinations for visitors.

Moonstone Beach Standard 4 (I) Site Coverage – View Corridors Required (page 7-52). Please describe how this standard maximizes view corridors to the shoreline. How many properties are subject to this standard? What is the current development pattern in this area? Where are the existing view corridors in this area? How has the County applied the existing standard for past development projects in the area?

Thank you in advance for providing the additional information requested above. Please feel free to contact me if you have any questions or would like to discuss these matters further.

Sincerely,



Jonathan Bishop
Coastal Program Analyst
Central Coast District Office



SAN LUIS OBISPO COUNTY DEPARTMENT OF PLANNING AND BUILDING

VICTOR HOLANDA, AICP
DIRECTOR

RECEIVED

July 13, 2006

JUL 14 2006

Jonathan Bishop, Coastal Program Analyst
California Coastal Commission
725 Front Street Suite 300
Santa Cruz, CA 95060

CALIFORNIA
COASTAL COMMISSION
CENTRAL COAST AREA

SUBJECT: Cambria and San Simeon Acres Community Plans of the North Coast Area Plan

Dear Mr. Bishop;

Thank you for your information request letter dated June 14, 2006 and received June 19, 2006, regarding LCP Amendment Submittal 1-06. We appreciate working together on this Community Plan update and look forward toward completion of this effort.

The following are responses to the questions and information needs raised in your letter:

Communitywide Standard 1 – Reservation of Service Capacity: The existing standard requires 20% reservation of water and sewer capacity for visitor-serving uses. The distribution of water and sewer capacity is tracked through the CCSD's billing and accounting software.

The affordable housing program required under Standard 1B would be reviewed by the County. However, the provision related to reservation of service capacity would be incorporated into the LCP and would require an amendment to the Area Plan.

The largest non-residential use group in Cambria and San Simeon Acres include visitor-serving uses in the Service and Entertainment industries. These Visitor-Serving uses depend on a sizable low wage earning workforce that typically cannot afford conventional housing in this area. For example, motels typically employ one person per one to three motel units with the majority of these employees being maids, maintenance workers, or grounds keepers. In Cambria alone, this results in a current demand for approximately 300 to 900 workforce employees to support the local motels. It is unrealistic for employees to drive from Paso Robles (the nearest community outside of the Coastal Zone, 30 miles east) for shifts at local restaurants, inns and shops because the travel time and cost is a good percentage of the actual work shift length and pay. Local business owners have stated that providing affordable housing for workers is the best approach to assisting and serving visitor serving businesses and that staffing difficulties is high among the reasons businesses close. The high demand for low wage earning employees coupled with the shortage of affordable housing in the area has placed a huge burden on visitor-serving establishments and the provision of additional affordable housing is crucial to the success of these establishments.

GCC Exhibit D
(page 32 of 37 page)

COUNTY GOVERNMENT CENTER • SAN LUIS OBISPO • CALIFORNIA 93408 (805) 781-5600

EMAIL: planning@co.slo.ca.us • FAX: (805) 781-1242 • WEBSITE: <http://www.sloplanning.org>

The proposed modification to allow for a percentage of the visitor-serving service capacity to be used for affordable housing requires a program to first be reviewed and approved. The proposed standard does not impact new, existing, or future visitor-serving uses. The program would detail how the policy would be implemented, how demand for visitor-serving uses would be met, and would be reviewed for consistency with Coastal Act policies. Through this analysis the appropriate percentage of capacity, if any, allocated from visitor serving uses to affordable housing would be determined.

Currently and historically, 25% of the water supply is used for visitor-serving and commercial uses. Any reservation of the existing water supply is not adequate for projected visitor-serving uses as Cambria is currently under a water shortage emergency. As described in the EIR, there are approximately 890 existing motel rooms and 520,000 square feet of commercial retail space in Cambria. The proposed plan would allow for a maximum of 1,455 motel rooms and 850,000 square feet of commercial retail space. Overall, estimated water consumption could potentially increase from the current use of around 800 acre feet per year to approximately 1,500 to 1,700 acre feet per year. It is important to note that these numbers are theoretical maximums based on development potential absent site specific limitation such as setbacks, topography, vegetation, and service availability. Current regulations limit development in accordance with site characteristics and existing service capacity. Proposed regulations strengthen these limits. Please see the EIR for more information.

San Simeon Acres Land use Changes:

Ramey (Gupta) – 2.2 acres: Developed as a 52-unit motel, manager unit and garage. The development was permitted under California Coastal Commission Permit #425-01, County Development Plan D820526:1 (see attached).

Sansone – 2 acres: Developed as a 31-unit condominium project. The development was permitted under California Coastal Commission Application No. 4-82-580, Tract 1051 (see attached).

Sansone - .52 acres: Vacant.

Most of the land within San Simeon Acres is in the Commercial Retail land use category. There is not a large enough local population to support the hotels, motels, and restaurants in San Simeon Acres. Much of these visitor serving establishments depend on business from visitors to the area. These visitors primarily frequent establishments visible from Highway One and located along the Highway One frontage roads (Castillo Drive and Hearst Drive). Establishments not visible from Highway One have faced bankruptcy and foreclosure, evidence that there are more visitor serving establishments than can be supported by visitors to the area and the local population. Further, there are underutilized and vacant parcels located along Highway One and between Highway One and Avonne Avenue. The vast majority of employment in San Simeon Acres is in the visitor-serving, service sector industry, resulting in a large need for multi-family housing. The proposed land use category changes are to help meet this need.

Recreation Standard 3 – Limitation on Use:

Caretakers may be necessary on properties in the Recreation category for security purposes or for continuous supervision or care of people, land, animals, equipment, or other conditions on the site. A caretaker's residence is allowable under the Fiscalini Ranch conservation easement and management plan and is included as an allowable use in Part 2 of the proposed amendment (see the Fiscalini Ranch standard submitted as Part 2 of LCP Amendment 1-06). Section 23.08.161 of the Coastal Zone Land Use Ordinance (attached) establishes standards specific to caretaker's residences. These criteria, along with all other applicable LCP criteria, is used to determine siting, design, and location of such facilities.

Water Master Plan for Cambria Program 11:

The CCSD has completed a Draft Water Master Plan. It is available at www.cambriacsd.org. Cambria Program 11 is a proposed new program. Please see Table 3-7 p. 3-44 for a schedule for completing the recommended service programs. Current development restrictions limit development in accordance with existing water supplies. Proposed regulations strengthen these restrictions.

Communitywide Standard 2 – Limitation on Residential Construction:

The limitation of 125 residential permits per year is a limit set by the Coastal Commission as conditions of approval of a previous Coastal Development Permit. Enclosed, please find a copy of Coastal Commission Application No. 428-10, an "Amendment to condition of Coastal Development Permit Number 132-18 and 132-20 (Conditions Nos. 2 and 4 respectively) to modify the annual hook-ups permissible to allow 125 residential hook-ups". Until the Coastal Development permit that established this limit is modified by the Coastal Commission, this limitation applies. The 125 unit limit is a maximum, not to exceed number of annual residential permits. If another service deficiency, such as water supply, limits development further, the 125 unit maximum would not be reached. The moratorium enacted by the CCSD does not affect this limit as it does not allow more than 125 annual residential permits.

Communitywide Standard 3 – Cambria CSD Service Extensions Outside the USL or URL:

The existing CCSD service boundary includes areas outside of the USL and URL (see enclosed map). This proposed standard limits new service extensions outside of the USL or URL are only to allow the CCSD to meet current commitments. The May 13, 1997 date and the exception categories are based on the results of previous challenges to determinations of the ability to be served by the CCSD and on the protection of coastal resources. Any applicant proposing development served by the CCSD but located outside of the USL and URL would need to demonstrate compliance with this section.

Communitywide Standard 5 – New Residential Land Divisions:

Determination of "equivalent legal lot" would occur through the discretionary review and environmental review process with consideration of a number of factors, including habitat, topography, public views, development potential and other site characteristics. Lots that are not comparable would not be considered equivalent.

Communitywide Standard 7 – Cambria Fire Department Review:

Cambria Fire enforces the 2000 Uniform Fire Code, 2001 California Fire Code, 2000 Uniform Building Code, 2001 California Building Code, 2003 Urban Wildland Interface Code and the CCSD's local amendments. The 2000 Uniform Fire Code, 2001 California Fire Code, 2000 Uniform Building Code, 2001 California Building Code, and 2003 Urban Wildland Interface Code are available for review at most libraries or for purchase from the National Fire Protection Association (www.nfpa.org). A copy of the CCSD's local amendments is attached.

Cambria Land Use Changes:

Please see the attached maps.

Environmentally Sensitive Habitat Areas:

The majority of new projects within Cambria consist of additions to single family residences. Overtime, the County has developed standard mitigation measures that apply when this type of development is proposed within an area mapped as TH but already disturbed and surrounded by existing development. These standard mitigation measures have been included in the proposed Monterey Pine Forest Habitat standards. This would be an example of when a "...comprehensive program or list of standards already exists, and mitigation measures have already been identified..." These proposed standards have been fully evaluated in the EIR.

Whether an adequate "comprehensive program", "list of standards" and "mitigation measures" exists would be reviewed for adequacy on a project by project basis. For example, for a specific development on a specific property, the standards for construction practices and vegetation replacement may be determined through the coastal development permit and environmental review process to be adequate for protection of ESHA consistent with the LCP and Coastal Act. While in other cases, because of the specific characteristics of another project or site, the standards may be determined to not be adequate and additional mitigation measures would be applied through the development and environmental review process.

Because the adequacy of the program, standards, and mitigation measures are reviewed on a project by project basis, decision makers or staff can address new information or changes to the habitat areas at any time new information is available or the habitat area changes.

Monterey Pine Forest Combining Designation Standard:

As stated in 2(C)1 under this standard, "project limit area" includes all areas of grading, vegetation removal, development footprint, necessary fire clearances and staging areas for all construction activities, the location of those activities, and areas for equipment and material storage. Mitigation is not only required for Monterey pine trees with a diameter of six inches or more at 4.5 feet above ground. Mitigation is required for impacts to the Monterey pine forest habitat. Standard tree replacement ratios are established for removal of trees with a diameter of six inches or more at 4.5 feet above ground. However, additional mitigation measures may be required dependant on the specific characteristics of the project site. As described above, the standards of this section may be adequate mitigation for impacts in specific situations or additional mitigations may be required.

This standard facilitates the County's evaluation of impacts to the Monterey pine forest, thus enabling the County to better implement all LCP requirements, including the avoidance of Monterey pine forest ESHA.

Communitywide Standard 5 – Site Review:

This is referring to Communitywide Standard 8 of the April 2006 Board of Supervisors Approved Draft of the Cambria and San Simeon Acres Community Plans of the North Coast Area Plan (Board Approved Draft). Discretionary review includes land use and land division permits whose approval also constitutes approval of a Coastal Development Permit.

Combining Designation Standard 8 – Clustering of Development Required:

This is referring to a proposed standard from the May 2005 Public Hearing Draft. Please note this draft is outdated and the draft submitted to your agency for review as part of this amendment package is the April 2006 Board of Supervisor's Approved Draft. The standard referenced from the May 2005 Public Hearing Draft has been revised. Please see Combining Designation Standard – Monterey Pine Forest Habitat 2(H) – Clustering of Development Required of the Board Approved Draft. This standard does not use the term "forested areas", rather "Monterey Pine Forest Habitat".

Table 7-1, Standards for Building Sites:

Please note that only the maximum allowable footprint is proposed to increase, not GSA. Maximum allowable GSA would stay the same as in the current Table G. Please also note that the number of allowable TDCs does not change, this section simply codifies current policy. Further, Table 7-1 applies to all small lot subdivisions, not just Lodge Hill as Table G did. Therefore, areas which currently have no square footage limit would have development restrictions. The proposal to increase the maximum allowable footprint is in response to community concern over the massive, boxy appearance of homes and the need for more single story living by the community's residents, many of whom are elderly. The EIR fully analyzes the potential for the proposed plan to result in impacts to Flooding and Soils, Geology, and Erosion. As detailed in the EIR, there are no significant impacts identified in these issue areas. By limiting otherwise unrestricted development square footage throughout the community, while allowing a minimal increase in footprint square footage in Lodge Hill, the proposed plan reduces the amount of allowable square footage and therefore reduces the impact to water quality and marine resources. Please note that in addition to these square footage limitations, all development is subject to the numerous policies, programs, and standards of the LCP that protect water quality and marine resources.

Combining Designation Standards Marine Habitat (SRA) – Projects with Point-Source Discharges:

The Cambria Flood Control and Drainage Study, online at www.slocountydrainagestudies.org/Cambria/final/index.htm, includes figures showing storm drain locations. Any applicant proposing point-source discharges would need to provide verification that the proposal is consistent with all applicable regulations from the various agencies (MBNMS, EPA, RWQCB, USFWS, CDF&G, etc). The County relies upon these agencies to determine consistency with their respective regulations.

Jonathan Bishop, Coastal Commission
Public Hearing Draft – Cambria and San Simeon Acres Community Planning and Building Department
7/13/2006
6

Moonstone Beach Standard 4(l) – View Corridors Required: This standard maximizes view corridors to the shoreline by requiring at least 50% of each site to remain free of structures and landscaping that would block views of the shoreline and coastal terrace from Highway One. The topography in this area is such that views of the shoreline and coastal terrace could be blocked by single story structures. This standard applies to all properties within the Moonstone Beach Area shown on Figure 7-21 in the Board Approved Draft. Many of the lots are developed with hotels/motels built in conformance with this standard since it has been in place since 1988. The County applies this standard by reviewing each development proposal for conformance with this section.

Thank you for your comments on LCP Amendment Submittal 1-06. The County believes all of the requirements of the California Code of Regulations Section 13552 have been met and the amendment should be considered filed as complete. Please contact me at (805) 781-4576 should you have any questions or concerns.

Sincerely,



Martha Neder, AICP, Planner
Department of Planning and Building

Enclosures

cc. Shirley Bianchi, District 2 Supervisor
Katcho Achadjian, District 4 Supervisor, Coastal Commissioner

Jonathan Bishop

From: Roland Soucie [rsoucie@charter.net]
Sent: Saturday, March 25, 2006 4:16 PM
To: Jonathan Bishop
Subject: LCU PLAN message with corrections

March 25, 2006

Mr. Jonathan Bishop,
California Coastal Commission
jbishop@coastal.ca.gov

Dear Mr. Bishop,

My name is Roland Soucie, a resident of Cambria. I represent the East Lodge Hill Residents Assoc. comprised of 38 residents in the area surrounding the 4-acre parcel incorrectly referred to in correspondence as "Kreps/Meltzer", but formally documented as Tract 226. Beginning in Sept. 2005 our members have submitted a petition requesting that Tract 226 be rezoned as Open Space, or at a maximum RSF in order to maintain the character of the neighborhood, and to ensure that the traffic problems we face today with Burton Dr. and Main St. at the new Grammar School, our only ingress and egress, does not rise above tolerable levels, and for safety reasons.

Since September our members have spoken privately with members of the Planning Dept., have attended every Planning Commission meeting in order to make our concerns known, and have written letters to each of the Commissioners. At the time of the vote Commissioners Christie and Gibson strongly lobbied for a RMF zoning for Tract 226 and they succeeded.

Our concern is that the Planning Dept. may not have provided you with the aforementioned petition and letters from our members for consideration prior to your decision, expressed in your urgent letter to the attention of Chairman, Board of Supervisors on March 14, in which you advocate that Tract 226 be zoned RMF. The problems described in the 1998 plan update for this region have been exacerbated by the addition of the new Grammar School, the impending growth of the Cambria Pines Lodge, and new construction planned on Ardath near the intersection of Route 1 as soon as RMF water becomes available. The Planning Dept's response to your letter in November has been that the problems described have been, or will be mitigated. They have informed you incorrectly in some instances and I am available and anxious to provide evidence to support this allegation.

May I please have your timely response confirming or disclaiming receipt of copies of our correspondence. The Board of Supervisors meet April 4th and we want to ensure that each group actively making decisions regarding Tract 226 do so with a full set of facts.

Respectfully Submitted
Roland Soucie
East Lodge Hill Residents Assoc.
3144 Wood Drive
Cambria CA 93428
805-927-1108

CCC Exhibit E
(page 1 of 22 pages)

3/29/2007

To: California Coastal Commission, Santa Cruz,
Att: Jonathan Bishop, Coastal Analyst, cc Commissioners
Sierra Club, Santa Lucia Chapter
North Coast Advisory Council , Cambria

4/10/06

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APR 12 2006

Subject: Stop the Proposed Sports Field

CALIFORNIA
COASTAL COMMISSION
CENTRAL COAST AREA

We must save the last open space located near downtown Cambria. It is now referred to as the East end of the Fiscalini Ranch. This open space is a grassy meadow bordered by homes a little farther to the East, and homes on a hillside to the South, hidden by trees. On the North side and across the adjacent Santa Rosa creek is a mobile home court which has been sold. In place of the mobile homes will be some apartments and possibly some low cost housing. Noise from the proposed sports activities in this meadow would travel outward and upward as in a bowl effect to the nearby homes (and businesses).

We recommend as do many other Cambrians, that this area be preserved as a quiet walking area with a designated trail and few benches. It is accessible to tourists and residents alike by a foot bridge from Main street (next to Bluebird Motel) and by a maintenance road from Burton drive. The West end of this meadow is bordered by Highway 1 and the Mid-State bank. This end is another possible entrance to the meadow.

Many Cambrians have donated money to preserve the area as open space, meaning no buildings and no organized activities such as a "sports field". We would appreciate any help you can give to preserve this area and the Santa Rosa Creek wetland.

Sincerely,
Cambrians For Fair Land Use (CFLU)
PO Box 1332 Cambria, CA 93428

Norman Fleming
Norman Fleming, Chairman

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MAY 15 2006

CALIFORNIA
COASTAL COMMISSION
CENTRAL COAST AREA

Rachel Youngman
2992 Wood Drive
Cambria, CA 93428
805-927-2456 phone
805-927-2473 business/fax
rachiewrites@charter.net

Mr. Charles Lester
Deputy Director
California Coastal Commission
Central Coast District Office
725 Front Street, Suite 300
Santa Cruz, CA 95060-4508

Dear Mr. Lester:

As a resident in proximity to Tract 226 in Cambria, I am writing to urge the Coastal Commission to give serious consideration to designating the space for single-family residences (SFR) rather than the currently popular idea of designating it for MFR. As you and your colleagues are well aware, the issues of infrastructure and water supply are extremely key in any planning for our area. An MFR designation would result in too many structures on too little space, thus negatively affecting traffic, drainage, noise, and the natural habitat, not to mention the peaceful quality of life that our neighbors now enjoy.

Open space is such a precious resource and dwindling so quickly; let's do as much as we can to preserve it. If Tract 226 cannot be held in perpetuity as unspoiled open space, then the least we can do to honor the land is to build as little as possible on it.

Many thanks for your attention.

Rachel Youngman



cc: Steve Monowitz, District Manager

CCC Exhibit E
(page 3 of 22 pages)

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02 521

Charles Lester, Deputy Director
California Coastal Commission
Central Coast District Office
725 Front Street, Suite 300
Santa Cruz, CA 95060-4508

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MAY 15 2006

CALIFORNIA
COASTAL COMMISSION
CENTRAL COAST AREA

Ref: Cambria And San Simeon Acres Community Plan Update dated November 2005, Page 7-59, P5, Tract 226 (Kreps/Meltzer)

The San Luis Obispo County Planning Commission has recommended that Tract 226 (Kreps/Meltzer) in Cambria be rezoned from Commercial Retail (CR) to Residential Multi-Family (RMF). We object to this change and request that the Board of Supervisors recommend that it be rezoned to Residential Single-Family (RSF).

The basic and most obvious reason is found by visiting the site. It is a 4 acre tract with flat to gently sloping topography from east to west. This is an ideal parcel for the development of single family homes-on a single level. Single story housing is very much in demand by an underserved market: families with members who are unable to cope with multiple sets of stairs on a daily basis. Physical disabilities, visual impairment or age related limitations are a few of the reasons that fuel the demand for single story houses on the North Coast. This market size is supported by the demographic data in Table 2-3 Age profile-2000 and commentary which reads: "In Cambria, 42 percent of the population is over 55 years of age."

Another benefit of RSF is a lower density, which would reduce impermeable surface areas; this is stated as general goal #8-Residential Design, Item F-Parking and Access. At present this acreage functions like a sponge absorbing rainfall as well as any runoff from the rear yards of adjoining homes on Wood Drive. Intensive RMF development will require substantial hardscape surface areas which will create a runoff problem. Water will flow down Wood Drive, then under Eton Road and across Tract #163 (Fitzhugh Farm) to the west side of Main Street and ultimately into Santa Rosa Creek. Any runoff will surely carry a number of contaminants from vehicles and parking areas, trash, chemical residues from landscaping and possibly silt from erosion of the downhill properties. How can this help the quality of water in Santa Rosa Creek which has been the beneficiary of environmental efforts and financing to improve the quality of the creek and habitat?

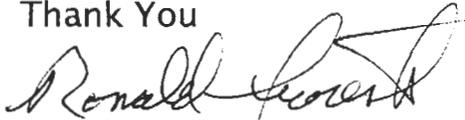
Single story homes would also be very compatible with the housing stock in the adjacent area which is primarily Residential Single Family. There are 34 single story RSF homes on Buckingham Place, Patterson Place, Wood Drive and Evensong Way. There are also 18 single family, one/two story homes on Wood Drive from Evensong to Eton Road.

CCC Exhibit E
(page 4 of 22 pages)

As described above, Residential Single Family zoning is more consistent with the goals of the Community Plan than RMF, more compatible with the housing stock in this neighborhood and with some creativity on the part of the Planning Commission can meet a definite demand for single story housing.

We encourage you to review this information and support a zoning change to Residential Single Family.

Thank You



RONALD SWIERK



ELIZABETH SWIERK

2755 Evensong Way
Cambria, CA 93428
Ph 805-924-1335

SM, JB, CL, RI



SAN LUIS OBISPO COUNTY
DEPARTMENT OF PLANNING AND BUILDING

RECEIVED

VICTOR HOLANDA, AICP
DIRECTOR

SEP 20 2006

CALIFORNIA
COASTAL COMMISSION
CENTRAL COAST AREA

September 18, 2006

Peter Douglas, Executive Director
California Coastal Commission
725 Front Street Suite 300
Santa Cruz, CA 95060

SUBJECT: SLO-MAJ-1-06 Cambria and San Simeon Acres Community Plans Update

Dear Mr. Douglas;

We are pleased to learn LCP Amendment 1-06 (Community Plan Update) has been deemed filed. Pursuant to correspondence with your staff, I understand this item will be scheduled for the October Coastal Commission meeting at which your staff will ask the Commission to authorize a maximum one year time extension.

However, the County respectfully requests a maximum 60 day extension. As you are well aware, the County, Coastal Commission, and the community have dedicated numerous resources to working on this plan for well over a decade. Recommendations and suggested modifications made by your staff and the Coastal Commission over the last 15 years have been incorporated into the proposed update. As a result of efforts from all parties, we have reached broad consensus on this previously controversial and divisive project. The Community Plan Update addresses major environmental and land use planning issues in the communities. It reduces potential buildout by approximately 50%; updates important information on land use, service capacity, and resources; expands Monterey Pine forest and other coastal resource protections; incorporates residential design guidelines and standards; and includes numerous policies, programs and regulations to address the many issues facing development in these communities. The current plan for this area is approximately 20 years old and in desperate need of update. We are concerned that a significant delay at this point in the process could jeopardize the critically important and unprecedented consensus that has been reached on this plan update.

Thank you for your consideration of a maximum 60 day extension. We look forward to working together to resolve any remaining issues. Please contact me at (805) 781-5708 or John Euphrat at (805) 781-5194 should you have any questions or concerns.

Sincerely,

Vic
Victor Holanda, AICP
Planning Director

CCC Exhibit E
(page 6 of 22 pages)

NORTH COAST ALLIANCE

Post Office Box 762
Cambria, California 93428

Fax (805) 924-0503

September 18, 2006

California Coastal Commission
Central Coast District Office
725 Front Street, Suite 300
Santa Cruz, CA 95060

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SEP 20 2006

CALIFORNIA
COASTAL COMMISSION
CENTRAL COAST AREA

Attn: Commissioners;

**Preserving the Heart
of the North Coast
Since 1997**

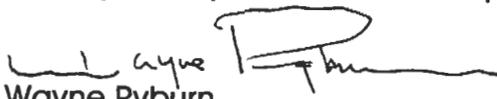
Our alliance supports your prompt public review and approval of The Cambria and San Simeon Acres Community Plans portion of the San Luis Obispo County North Coast Area Plan (NCAP).

We have advocated for an NCAP update since our founding in 1997 while several of our Board of Directors and supporters have done so for more than fifteen years.

There is an overwhelming consensus among local public agencies and the environmental community that the NCAP adopted by the Board of Supervisors and certified by your commission in 1988 is a hopelessly outdated, incomplete and flawed document.

A prolonged approval of the Cambria and San Simeon Acres update would jeopardize your mandate to protect our gateway to Big Sur. Accordingly, we support the San Luis Obispo County staff recommendation for an initial review by January 1, 2007.

Thank you for your attention and prompt action in this matter.


Wayne Ryburn
Chair, North Coast Alliance

c. Martha Neder

Directors:

Bill Allen

Bill Bianchi

Betty Fiscalini

Glenn Hascall

Pat Hascall

Helen May

Wayne Ryburn

09/18/06

Wayne Ryburn

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SEP 25 2006

CALIFORNIA
COASTAL COMMISSION
CENTRAL COAST AREA

September 18, 2006

California Coastal Commission

Attention: Commissioners

Dear California Coastal Commission,

After approximately 15 years, we have reached a broad consensus on a previously controversial and diverse project. The Community Plan update addresses major environmental and land use planning issues in the communities. It reduces potential build-out by approximately 50% and puts a cap on the maximum number of future dwellings. It updates important information on land use, service capacity, and resources; expands Monterey Pine forest and other coastal resource protections; incorporates residential design guidelines and standards; and includes numerous policies, programs and regulations to address the many issues facing development in these communities. The current plan for this area is approximately 20 years old and, as we all know, in desperate need of update. We are concerned that a significant delay at this point in the process could jeopardize the critically important and unprecedented consensus that has been reached on this plan update. I urge you to continue with this item immediately, **do not** authorize any extension.

Sincerely,



Debra Dill

311 Susannah Lane

Paso Robles, CA 93446

CCC Exhibit E
(page 8 of 22 pages)



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September 28, 2006

OCT 02 2006

CALIFORNIA
COASTAL COMMISSION
CENTRAL COAST AREA

DIRECTORS:

Peter Chaldecott
President

Donald Villeneuve
Vice President

Joan Cobin
Director

Ilan Funke-Bilu
Director

Gregory Sanders
Director

OFFICERS:

Tammy Rudock
General Manager

Arther R. Montandon
District Counsel

Kathy Choate
District Clerk

California Coastal Commission
Attention: Commissioners
Central Coast District Office
725 Front Street, Suite 300
Santa Cruz, CA 95060-4508

Re: Cambria and San Simeon Acres Community Plans of
the North Coast Area Plan

Dear Commissioners:

We understand during your October 11-13 meeting in Long Beach that you may be considering the authorization of an extension to hold the public hearing for the Cambria and San Simeon Community Plans of the North Coast Area Plan. Respectfully, we request your consideration to authorize a maximum 60-day extension.

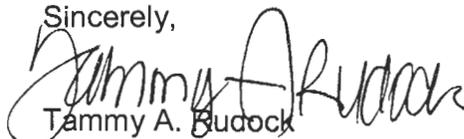
CCSD staff, ad hoc committees, constituents, and consultants spent almost one year working closely with San Luis Obispo (SLO) County Building and Planning staff and consultants, the SLO County Planning Commission, and the SLO County Board of Supervisors to develop the Cambria portion of the Community Plans update.

After unanimous approval by the San Luis Obispo County Board of Supervisors in May 2006, the County forwarded the Community Plans update to the California Coastal Commission.

The Cambria portion of the Community Plans update reduces buildout, protects coastal resources, and includes policies, programs, and regulations with regard to development issues in the Cambria community. Given the existing plan is 20 years old, the update is imperative to address the major environmental and land use planning issues within our community.

Thank you for your consideration.

Sincerely,


Tammy A. Rudock
General Manager

CCC Exhibit E
(page 9 of 22 pages)

3680 Conquista Avenue
Long Beach, CA. 90801
October 4, 2006

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OCT 06 2006

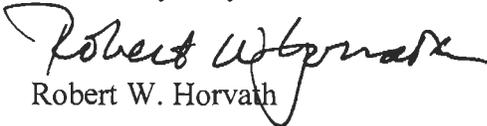
CALIFORNIA
COASTAL COMMISSION
CENTRAL COAST AREA

California Coastal Commission
Central District Office
725 Front Street Suite 300
Santa Cruz, CA 95060

RE: W9c, San Luis Obispo Co. LCP Amendment No SLO-MAJ-1-06 Parts 1 & 2
October 11, 2006 meeting

I understand that this item is simply about a time extension. The proposed plan changes happen infrequently, and should be done carefully. There are major changes proposed for the building standards in Cambria, where I own property. Since there is a building moratorium in Cambria that will not likely be lifted for several years, a time extension is acceptable. The building standards will largely affect people who own lots and reside out of the area. It is most important that you schedule the public hearing on the plan changes at a location that is accessible to central coast, central valley, and southern California residents, and that there be plenty of advance notice given of the date. There has been substantial controversy about growth in the area, and it is critical that all stakeholders be given a reasonable opportunity to participate, not just the vocal few who often represent narrow interests.

Yours very truly,


Robert W. Horvath

COC Exhibit E
(page 10 of 22 pages)

4/17 JB
10/06 DD's rpt (1) W9C

Suzy Ficker
Cambria Legal Defense Fund
P.O. Box 516
Cambria, Calif.
Ph: 805-927-8078
In Palm Springs
(760)323-1291

LCP Amend,
#SLO - MANS
1-06 - Parts 1 & 2

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OCT 06 2006

CALIFORNIA
COASTAL COMMISSION
CENTRAL COAST AREA

Yes! Approve of
EXTENSION
for further
fact finding etc.

To:
The Calif. Coastal Commission
Commissioners and Staff, et al.

Dear friends—
Please excuse this hastily written
and informal note, but as I have
been residing in Palm Springs
the past couple of years my Coastal
Commission notifications must
have gone by the wayside.

I learned about the referenced
amendment only upon my recent
return to Cambria.

★ S.L.O.Co. continues the usurpation
of whatever powers necessary
to invalidate the validity
of that which had been
presumed to be the preservation
of "open space in perpetuity"

(continued)

2

Cambria Legal Defense Fund

Several years ago at a hearing of your Commission in S. L. O. I was the first to alert you to this situation.

In an attempt to alleviate the age-progressive actions of SLO Co. in its attempt to proliferate its ambitions for expanded County Park facilities the Cambria Legal Defense Fund and other citizens groups supported legal action against the County (and State) represented by Yates & Wagner of Sacramento.

Our appeal was sent to the State Atty. General for investigation along with our petitions bearing over 200 signatures opposing the change-over from open space intentions to practically any use. The County saw fit to realize its maximized ambitions for public parks in the Cambria environment.

Unfortunately at the culmination of the purchase of East-West Ranch open space things became (to put it mildly) convoluted beyond all description!

Our request to the State's Atty. General was not granted, and we are troubled by the fact that he most likely could not even had the time for proper scrutiny of the Subject appeal!

★ We strongly urge your Commission to approve the extension

so that this Community of people, and that of San Benito as well, can be assured of a more equitable evaluation of their environment than that which the County has had to offer these many years that I have been associated with SLOCo planning. And that is over 20 years!

(5#)

Please continue to keep
me informed of any and
all subjects & information
relating to this issue -

It would be appreciated
if the same info could
be forwarded to one of our
attorneys ~~Vern~~ Alsham.

Thank you for this opportunity
to comment -

Most sincerely -

Suzanne
CJF Founder

P.S. A Reminder!

Vote ^a ⁴ YES on
proposed extension !!!

"A"

Suzy Ficker 10-3-06

See enclosed photographs

Artists rendering of
Vadnais Condo Project
illustrate the extent
of the interendant project
and its effect on
the view shed.

The proposed project is
essentially the same
as that which was
opposed by local resi-
dents and appealed
to your Commission by
the Cambria Lgl. Dist. Fund.
Ultimately the CCC squelched
this project.

Lately, there is rumour,
that Dean Vadnais
and/or his contractor are
once again pursuing this
plan.

He has no permit, but it's
said he has revised the
Co. Plan to include condos
there.

John Hofschroer at S.L.A.S. E
Planning should have ~~accounted~~ 22 pages
to this.

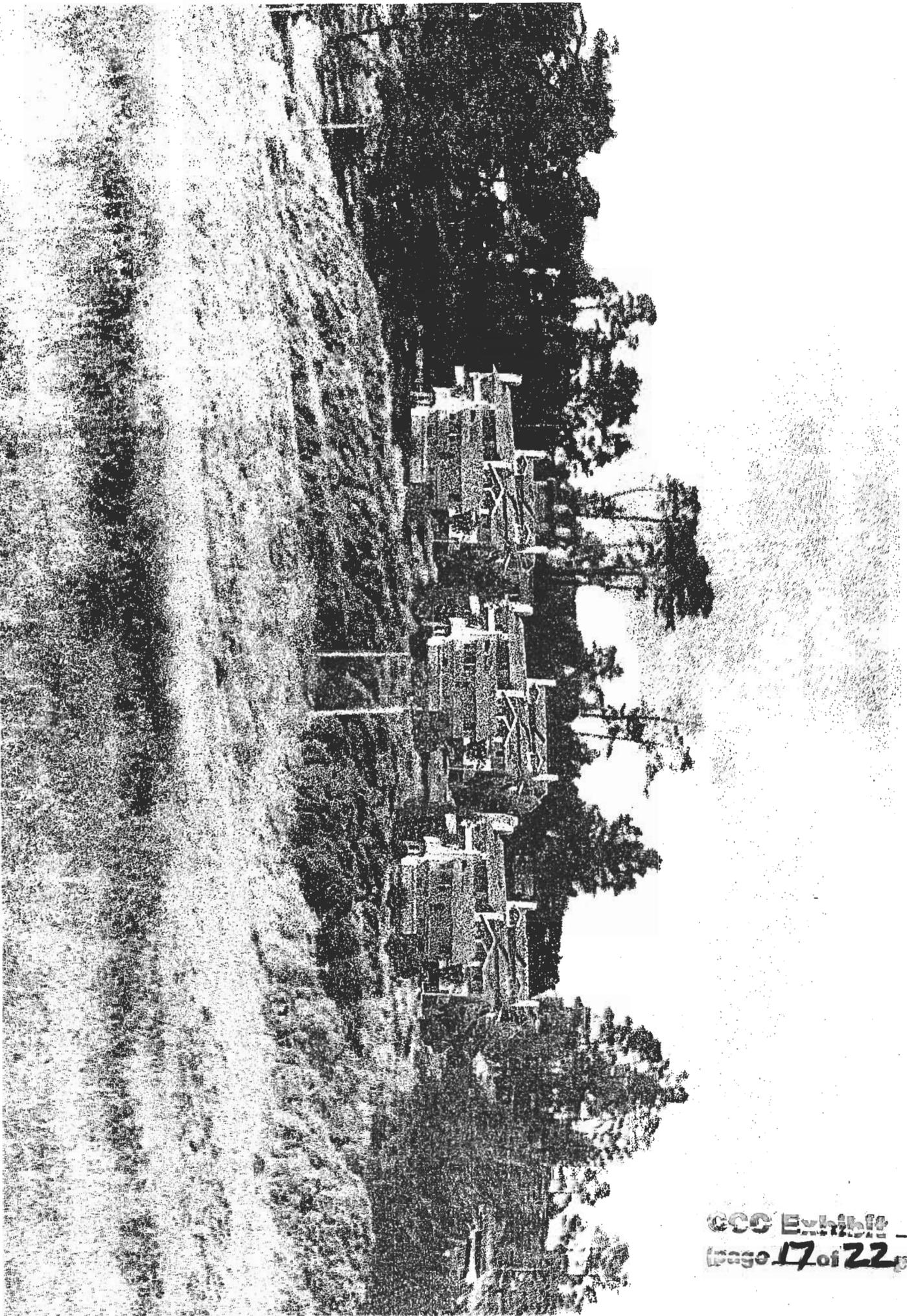
"A"

Continued.

- (1) The aspect of this Condo plan, of greatest concern to Pine Knolls residents was/ies of the possible instability of the hill which might occur as a result of extensive * hillside grading and excavations.

- (2) The ingress & egress which posed a danger to traffic traveling up & down the hill - and was situated only about 50 feet from main St. which now has a four way stop signal.

Pine Knolls Condos - Artist's Rendering



10-3-06

To: California Coastal Commission
Michael Reilly, Supervisor, Dave Potter, Supervisor,
Jonathan Bishop, Anal.
From: Cambrians For Fair Land Use (CFLU)

10/1/06

Subj. Preservation of the East Fiscalini Ranch in Cambria.

The land to be preserved is the East portion of the Fiscalini ranch adjacent to downtown Cambria, accessed from Burton Drive. It is an area bordered by residences, businesses, churches, motels and mobile homes.

To allow this land to become a county park would lead to its use as a sports field and endanger the adjacent Santa Rosa Creek. This land should be preserved as far West as the Mid-State Bank.

In the years 2000 to 2001, the Cambria Community Service District sought to preserve this land by drafting Covenants, Conditions & Restrictions (CC &RS) and a Memorandum of Understanding (MOU) specifying the allowable use of the land to be resource enhancement and public access only. We believe this allows a walking trail and benches, but should exclude active sports and structures.

We urge the Coastal Commission to affirm that this land is indeed Open Space and is protected from development and other habitat altering uses.

Cambrians for Fair Land Use
PO Box -516, Cambria, CA 93428
Secretary, Norman Fleming

and Cambria Legal
Defense Fund
Suzy Ticker,
Founder
(805) 927-8028
In Palm Springs,
(760) 830-2311
(page 18 of 22 pages)

Citizens for Preserving Cambria Rodeo Grounds

The Cambria Parks and Recreations Department is planning on developing a soccer field, baseball field, a pad for a basketball and volleyball court and a multipurpose Community Center on the Cambria Rodeo Grounds wetland and floodplain.

- Fact--The Cambria Rodeo Grounds is a Wetland.
- Fact--The Cambria Rodeo Grounds is a floodplain. Should you be concerned that the District keeps building when they have legally adopted BY RESOLUTION that they don't even have enough water to meet the needs of current water customers?
- Fact-- The people of the state of California passed the Coastal Act, which requires the protection of wetlands and floodplains.
- Fact--If you live downstream from this proposed development, be concerned! Any armoring of the creek banks to protect urban development on a floodplain upstream will cause worse flooding for you.
- Fact--The Coastal Commission was committed to the preservation of the small area of wetland that the school proposed to use. The school was made to accept another alternative in order for the wetland to be preserved.
- Fact--The Coastal Commission did not approve Midstate Bank using wetlands.
- Fact--RRM Design group has been hired to develop plans for a soccer field, baseball field, a pad for basketball and volleyball, and a multipurpose community center.
- Fact--The old Midstate Bank building has been purchased and is being moved for the use of a multi purpose community center. Do Cambrians need another one on the Rodeo Grounds? Price for purchase was \$75,000. \$35,000 from CCSD. \$40,000 from Lions Club. The CCSD money was our tax money.
- Fact--This issue was placed on a ballot approximately 10 years ago. It was defeated at that time by the Cambria electorate. It should be placed on a ballot again!
- Fact--We have a new head of Parks and Recreation hired by the CCSD who has taken one side only. Is this the image Cambrians want in the middle of the 40 acres off of HWY 1?

This is wetland that was acquired for open space!
The cart has been put before the horse!

MEETINGS ON THIS ISSUE WILL BE HELD:

Wednesday 2/12/03 at 5:00 pm Vets Hall: P.R.O.S

Thursday 12/13/03 12:30 pm Vets Hall: C.C.S.D

Cambrians may pay to play

MEETING TO DISCUSS PARK DEPT. FUNDING SOURCES

By KATHE TANNER
THE CAMBRIAN

Cambrians will learn more about their new Parks and Recreation Department at a special meeting at 7 p.m. on Feb. 13 at the Veterans Memorial Building.

The Cambria Community Services District and the Parks, Recreation and Open Space Commission will hear about the here-and-now and the hoped-for future, which could include a three-quarter-cent sales tax hike in Cambria. CCSD board members will talk more about complete budget plans at their regular Feb. 20 meeting (set a week earlier than usual).

On the 13th, CCSD directors are expected to "approve the goals and objectives of the (parks) department, so we have the direction to move forward on the tasks we should be working on," such as taking the costs and

responsibilities of the Community Center of Cambria and youth center programs. "We're not jumping out there hiring people, or starting programs, until we've got the money to support them," said Tammy Rudock, CCSD's assistant general manager.

The special workshop meeting was scheduled so CCSD directors could finish what they started last month, when they officially recognized the department and identified its functions as open space, community facilities, adult and youth sports and recreation activities, and community classes, programs and services.

The district doesn't yet have a new revenue stream to support the new responsibilities of what has been an unnamed but functioning department in the past. Budget information that will be presented at the meeting will include identifying current expenditures for the commission and for functions that will fall under the Parks and Recreation department.

CCSD is applying for "a per-capita grant from state Prop. 40 funds," Rudock explained. She said that grant should bring the

district from \$200,000 to \$250,000 (money that can be used for operations), based on the population and "the fact that we have been running the parks and recreation function for a few years. Just getting East West Ranch put us in the parks business."

Rudock anticipates that, once the district has tapped a more permanent source of support, the Parks and Recreation Department will have an annual operating budget of about \$500,000, including "operating a full range of recreational sport programs, required staffing levels for recreational activities, grounds maintenance, and administration (including contract umpires and referees), facilities operations and maintenance, and purchasing vehicles, equipment, and supplies.

"Fees will be collected for the recreational sport programs and for use of facilities..." Rudock continued. "Other revenue sources may include: District sales tax, general fund, special assessment districts (such as lighting and/or landscaping), grants and entitlement funds, and park-development impact fees."

Exploratory group eyes East Ranch plans

COLLECTING IDEAS, LAYING FOUNDATION FOR DISCUSSION

parks Commissioner Jack Breglio led the hour-long tour, the group reconvened over pizza at the Veterans Memorial Building for a brainstorming and strategy-planning session.

"There was unanimous agreement on the two top priorities for the community park," said Joan Cobin, CCSD board member and former member of the Parks, Recreation and Open Space Commission. "Namely, playing fields for soccer and baseball, as well as a pad for basketball and volleyball and, secondly, a multipurpose (for all ages) community center."

"The next favorite theme was the use of the old grammar school as a cultural center for the community and a nature education center, with a tie-in to the community park wetland area."

Future sessions of the group will be followed by a series of public meetings.

The CCSD board may give

It was a little muddy, but that didn't daunt two dozen people who had come to see Cambria's East Ranch up close Saturday. The hikers were a mixed bunch, there as individuals or to represent all kinds of local groups, from schools and government agencies to clubs and sports organizations.

The idea, according to the Cambria Community Services District's new parks planner Bob Kelly, was to bring the potential enthusiasts up to speed on what facilities community members have requested for the long-planned recreational area on a 40-acre site east of Highway 1.

After CCSD's Ben Boer and



CAMBRIAN PHOTO BY KATHE TANNER

A group of recreation enthusiasts traipsed through parts of the East Ranch Saturday, looking over prospective park sites.

the idea a jump start at its meeting Dec. 19. According to the agency's tentative agenda, the directors are expected to ap-

prove a contract with RRM Design Group to design the park's master plan.

— *Kathe Tanner*

Jonathan Bishop

From: Doug Buckmaster [dougback@sbcglobal.net]
Sent: Thursday, March 22, 2007 9:28 PM
To: Jonathan Bishop
Cc: Steve Monowitz; Peter Douglas
Subject: Rezoning of CCSD Parcel

Dear Mr. Bishop:

I understand that the Coastal Commission is planning to send back the Cambria and San Simeon Design Plans with some recommendations to be considered by the County of San Luis Obispo.

I would like to address a parcel in Cambria which now is owned by the Cambria Community Services District. It is approximately eight acres in size and is on Main Street at the very eastern end of "town" at the junction with Santa Rosa Creek Road. It used to be owned by the Bahringers. The property currently is zoned Multi-Family. I understand that the District wants to rezone it Public Facilities.

Knowing the history of that property, there is almost no way that an appropriate facility can be built on that property to serve as a "city hall" for the CCSD. That seems to be their current dream, however. The restrictions for creek setback (100 feet), setback from the Jehovah's Witness Church, and the heavy traffic -- industrial and school -- on Main Street would limit severely what can be built there. Also, there is a building restriction (one structure only) that goes with the land.

Accordingly, I strongly recommend that this parcel be rezoned as Open Space. If you have any questions about the property, you might do well to contact Ingrid Warren of SLO County General Services. She could provide you with all the details to justify an open space designation.

Thank you for considering this suggestion.

Sincerely,

Doug Buckmaster
1965 Emmons Road
Cambria, CA 93428
(805) 927-4206