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July 1, 2014

Honorable Bruce Gibson
Chairperson, Board of Supervisors
County of San Luis Obispo
1050 Monterey Street
San Luis Obispo, CA 93408

Subject: Water Resources Advisory Committee Comments on the Resource Management System Update

Honorable Sirs and Madams,

This letter serves to transmit the Water Resources Advisory Committee's (WRAC) comments on the County's draft Resource Management System Update.

At the February 5, 2014 WRAC meeting, WRAC members approved formation of an ad hoc subcommittee tasked with reviewing the water resources related sections of the County of San Luis Obispo's Draft Resource Management System (RMS) Update (General Plan amendment). Subcommittee members included: Member Hollenbeck (District 5), Member Zelinski (Agricultural At-Large), Alternate Member Walters (Development At-Large), Member Luft (Environmental At-Large), and Member Neil (Atascadero Mutual Water Company). City of San Luis Obispo Utilities Manager, Wade Horton, also volunteered to provide input to the subcommittee. Member Hollenbeck served as chair of the ad hoc subcommittee.

The subcommittee met on February 25th and March 21st to review the RMS Update, and provided reports at the WRAC meetings on March 5th and June 4th. Comments are reflected in the attached WRAC discussion summary and track-changes document, which was also provided to County Planning and Building Department Staff. At the June 4th WRAC meeting, the WRAC reviewed and approved the ad hoc subcommittee's comments and voted to submit the comments to your Honorable Board and the County Planning Commission for consideration.

Respectfully submitted,

A. Sue Luft
WRAC Chairperson

Attachments: Summary of Resource Management System Update Subcommittee Report and WRAC Discussion on June 4, 2014
Revisions to the County Draft Resource Management System Update

Cc: San Luis Obispo County Board of Supervisors, All Districts
San Luis Obispo County Planning Commission
Brian Pedrotti, County Planning and Building Department

Purpose of the Committee:

To advise the County Board of Supervisors concerning all policy decisions relating to the water resources of the SLO County Flood Control & Water Conservation District. To recommend to the Board specific water resource programs. To recommend methods of financing water resource programs.

Summary of Resource Management System Update Subcommittee report and WRAC Discussion on June 4, 2014

The WRAC received the RMS Subcommittee report on the Resource Management System (RMS) Update in the June meeting agenda package. Due to time constraints (final draft document to be completed by end of June), the WRAC empowered the RMS subcommittee to provide their comments directly to the decision-makers by a vote of 8 - 7. As is standard WRAC procedure, the attached comments are being provided to the Board of Supervisors with copies to the Planning Commission and the Planning Department.

Although not part of the WRAC motion and subsequent action, a brief summary of the WRAC discussions on June 4, 2014 regarding the RMS Subcommittee report is included.

WRAC members supported the subcommittee report in general. Some specific issues listed below were discussed by the WRAC, but no formal actions were taken.

- The subcommittee recommended changing the LOS III definition from “resource capacity met or exceeded” to “resource deficiency”. The SLO County Farm Bureau, in a memo which was submitted to the WRAC, requested that the original term be reinstated.
- The word “depletion” was changed to “use” by the subcommittee on pages 57 and 58 (and possibly other locations in the document). The Farm Bureau recommended that the original wording be reinstated.
- Concern was expressed by several WRAC members that the current LOS system has not provided adequate warning and action to prevent continued depletion of the resource. This concern is reflected by the LOS III designation in several groundwater basins, which the RMS system is intended to prevent.
- One WRAC member requested that the process and timing for moving from a recommended level of severity to a certified level of severity be included.
- One WRAC member noted that treatment levels of wastewater was not discussed in the wastewater section and that encouraging treatment to tertiary levels as a preferred treatment level should be included.
- Farm Bureau provided a letter dated June 4, 2014 with a new set of comments for consideration by the subcommittee.

CHAPTER 3: RESOURCE MANAGEMENT SYSTEM



~~The General Plan, its Resource Management System (RMS), and the Land Use Ordinance work in concert to support future development. The General Plan's Land Use Element focuses development in specified communities and land use designations. The Land Use Ordinance sets minimum parcel sizes, density requirements and other standards for creation of new parcels and development of existing parcels. The RMS is intended to assure that services and resources will actually be available to support the new development envisioned in and allowed by the General Plan and Land Use Ordinance. In that way, the RMS is essential to carrying out the General Plan's vision.~~

~~A. INTRODUCTION –HOW RESOURCES AND GROWTH ARE RELATED–~~

~~The General Plan, its Resource Management System (RMS), and the Land Use Ordinance (LUO) work in concert to guide decisions on future development. The General Plan's Land Use Element (LUE) focuses development into specified communities and land use designations. The LUO sets minimum parcel sizes, density requirements and other standards for creation of new parcels and development of existing parcels. The RMS assures that services and resources are available to support the new development envisioned in and allowed by the General Plan and LUO.~~

~~When the capacity of one or more resources cannot be expanded, or the timing of resource expansion does not keep pace with growth, special land use and/or resource management measures may be needed. Such measures are described in Section F under "Resource Management Techniques." These techniques are intended to provide for sustainable growth in a community or area, as opposed to allowing growth to continue in a manner that would result in a resource deficiency. These resource management techniques can provide the lead time needed to develop and implement solutions to deficiencies in resource capacity.~~

~~As the county enters the 21st century, the public and decision makers have become more aware of the limits of our natural resources, the cost of expanded infrastructure and its maintenance and the difficulties in finding solutions to these problems. Deficiencies in many man-made resources such as sewers, schools, police and fire protection can be overcome by upgrading or expanding such facilities. Although augmentation of man-made resources may be costly, the solutions are tangible and easily identified. This is often not the case with natural resource limitations. Solutions are not always obvious and technical data may be confusing or lacking altogether. There may also be significant, even prohibitive, costs involved in determining resource capacity and availability.~~

~~San Luis Obispo County is experiencing problems with both natural and man-made resources (e.g. water supply and wastewater facilities) and competition for limited resources such as water. In some communities, schools are overcrowded, or are anticipated to be. Communities have also experienced problems with septic systems and water supply. In addition, many roads and freeway interchanges are nearing unacceptable levels of service, and air quality in some areas is deteriorating.~~

~~The net result of such problems has been a never-ending game of "catch up," where rates of growth and development outstrip the upgrading and renewal of community resources. Since most resources extend beyond political boundaries, cities, special districts and the County must work together to identify their resource capacities in relation to future growth and to implement solutions to resource deficiencies.~~

~~The RMS operates on two distinct levels. Attention is first given to the development of the county as a whole. The Land Use Element guides population growth where it can be supported by existing resources, using the RMS as an information tool. The countywide perspective must persist throughout the analysis of community resources and recommendations for resource management measures.~~

~~The second level of the RMS is the community. Each community must be evaluated with respect to resource availability and capacity, as well as the effects of community development on surrounding agricultural lands and rural areas and vice versa. When an individual community is perceived to have a potential resource problem, steps must be taken to correct the situation, and, if necessary, utilize various methods to redirect growth to communities which have the capability to support additional population.~~

~~The Land Use Element combines both perspectives described above in an effort to resolve issues of distribution and location rather than growth versus no-growth. However, temporary growth control measures could sometimes be considered at the community level in order for resource capacities to catch up with development.~~

~~Sometimes limited resources cannot be expanded and special growth and resource management measures are needed. Such measures are described in the following Section F under "Resource Management Techniques." These measures help provide for sustained, long-term growth, as opposed to allowing unmanaged growth to continue and exceed resource capacities at market-driven rates and locations. Growth and resource management measures can also allow for the additional lead-times needed to develop and implement solutions to resource capacity problems.~~

B. FOCUS OF THE RESOURCE MANAGEMENT SYSTEM

The focus of the RMS is on data collection, problem identification and developing solutions to resource capacity problems.

~~The Land Use Element LUE identifies appropriate locations for different land uses on the basis of minimizing conflicts between them. The goal of the LUE is to identify appropriate locations for, and minimize conflicts between, differing land use categories. The RMS refines that approach by also considering:~~

~~The RMS supports the County's LUE goals by:~~

- ~~• Determining if the necessary resources exist;~~
- ~~• Identify if resources that can be readily developed to support new land uses; and~~
- ~~• Identify critical points in time when decisions are needed in order to maintain adequate lead-times to~~

build ~~needed~~ facilities and avoid resource deficiencies.

The six resources/services addressed by the RMS are:

- Water Supply and Systems
- Wastewater Treatment
- Schools
- Roads and Freeway Interchanges
- Air Quality
- Parks

The RMS provides the information to plan for sustainable resources for long-term growth.

~~The RMS focuses on urban areas, but rural areas are addressed as needed. This focus enhances the effectiveness of the RMS, particularly with regard to water resources and watershed resource planning. For example, irrigated agriculture requires a great deal of water, and an analysis of water availability must take into account water used by irrigated agriculture in rural areas. In two of the county's largest groundwater basins, the Paso Robles and Santa Maria basins, there is a large component of rural water demand. In the Paso Robles basin, rural and agricultural water use represents more than 75% of the total water demand.~~

C. GOALS AND OBJECTIVES OF THE RESOURCE MANAGEMENT SYSTEM

~~The overall goal of the~~The RMS is intended to provide information on resource capacities in support of to guide decisions on the land uses envisioned in the LUE through the following goals. ~~decisions that seek to assure sustainable resource capacities for long-term growth. More specifically, the RMS is intended to evaluate proposed developments to ensure that their demands on natural resources will not exceed sustainable capacities, and their demands on public resources will not exceed existing or planned capacities or service levels.~~

- ~~Avoid-Align~~ the use of public resources, services and facilities ~~beyond their renewable~~ with existing and future capacities.
- ~~Monitor new~~Evaluate proposed development areas to ensure that ~~its demands on~~ resources ~~demands~~ will not exceed sustainable capacities, existing and planned capacities, or service levels.

The RMS objectives are: ~~goal of the RMS can be expressed in the following objectives:-~~

1. Resource Conservation ~~– To identify the sustainable capacities of the resources needed for growth and to minimize the impacts of the development envisioned in the LUE on these resources.~~ To minimize impacts of future development on the long-term availability of essential natural resources, and to identify the limits or "carrying capacities" of those resources by studying the relationship between development impacts and resource capacities.
2. Public Health and Safety - To support efforts to provide county communities with adequate supplies of water for domestic and fire suppression purposes, adequate potable water, acceptable air quality, adequate facilities for sewage/wastewater disposal, and safe streets and roads, by monitoring their capacities to accommodate the development allowed by envisioned under the Land Use Element LUE.

Public Services and Facilities -To support the provision and upgrading of public services and facilities at a rate

that keeps pace with population growth, by anticipating resource needs ~~sufficiently~~ in advance of critical necessity. ~~so that adequate facilities are available before their lack creates critical necessity.~~

3. Agricultural Lands - To encourage protection of productive agricultural land, by considering the effects of current and future development on area-wide water resources needed for agriculture.
4. Community Character - To support the diversity of life-styles and physical character in county communities by ~~tailoring local problem solutions to specific community conditions~~ tailoring solutions to resource capacity issues that are specific to the community.
5. Economic Impacts - To delay or avoid the adverse economic effects of development moratoria and more severe growth restrictions ~~by enabling timely solutions to avoidable resource problems before the need for drastic remedial measures~~ through proactive management of resources.
6. Public Involvement -To provide a public forum for reaching decisions affecting community growth and development, where goals and policies can be discussed, and where such decisions are subject to public scrutiny.

Agency Cooperation - To establish a system ~~which that~~ supports coordination and cooperation between the various public, quasi-public and private entities providing services and facilities, ~~including the county, the cities, community services districts, school districts, private utility companies, special districts, and the state and federal governments.~~

D. RESOURCE MANAGEMENT SYSTEM FRAMEWORK

~~(Delete the photograph – it is not relative and takes up space)~~

Responsible Agency

The operation of the RMS is the responsibility of the ~~Department of Planning and Building~~ Department (“Planning Department”) with input from other public private resource management entities and agencies¹.



and

~~County departments~~

~~Cities~~

~~Air Pollution Control District~~

~~Community Services Districts~~

~~Water and sewer providers~~

~~Caltrans~~

~~Water Resources Advisory Committee~~

~~San Luis Obispo Council of Governments~~

Levels of Severity for Monitored Resources

The RMS is designed to deal with ~~multiple levels of deficiencies~~ resource capacity issues on multiple levels, including: ~~These include:~~

- ~~Neighborhood-level problems, such as a needed collector street~~
- ~~Communitywide problems, such as the need for public sewers~~
- ~~Areawide problems, such as overdraft of a groundwater basin.~~

The RMS uses three ~~levels of alert (called levels of severity)~~ Levels I, II, and III ~~levels of severity (LOS I, LOS II, and LOS III)~~ to identify potential and progressively more immediate resource deficiencies. The levels of severity alerts are intended to occur while sufficient time is available ~~for avoiding or correcting~~ to avoid or correct a shortage before a crisis develops.

~~Level of Severity III occurs when resource use exceeds the capacity of the resource. For instance, when a groundwater basin is overdrafted or a road segment is operating beyond its design capacity, those particular resources operate at Level III. Criteria for Levels I and II precede the threshold for Level III by providing lead times necessary for avoiding or correcting particular resource deficiencies.~~

The criteria for each resource are described in tables and text in Section F of this chapter entitled "Resource Management Issues, Criteria for Levels of Severity, and Recommended Actions." The criteria for each level of

¹ Examples of such agencies include, but are not limited to, other County departments, Cities, the Air Pollution Control District, the Community Services Districts, providers of water and sewer services, Caltrans, the San Luis Obispo Council of Governments, the Regional Water Quality Control Board, the Central Coast Water Authority, and the Monterey County Water Resources Authority.

severity are not absolute, as particular community conditions or circumstances may logically support alternative criteria. Instead, they offer general guidelines for determining when resource management measures should be enacted.

~~The criteria for each resource are described in tables and text in Section F of this chapter entitled "Resource Management Issues, Criteria for Levels of Severity, and Recommended Actions."~~

Threshold population levels or dates corresponding to the three levels of severity may be defined in the ~~Land Use Element~~LUE area plans and community plans for the resources of each area and community. A summary of the current estimated levels of severity are listed in Appendix D.

E. RESOURCE MANAGEMENT SYSTEM PROCESS

This section describes the activities that produce information to identify levels of severity, and the process for determining appropriate policy decisions in response to new information. The basic products of the information-gathering aspect of the RMS include:

- **Resource Inventories:** Data collection through the update of the [Land Use Element LUE](#);
- **RMS Monitoring Program:** Periodic status reports on resource usage in areas with levels of severity;
- **Biennial Resource Summary Report:** Report prepared by the [Department of Planning and Building Planning Department](#) with input from other County departments and service providers.;
- **Resource Capacity Studies:** Special studies of resource usage when ordered by the Board of Supervisors upon its determination that a new level of severity has been reached through the advisory process described below.

Resource Inventories

As part of the update of the [Land Use Element LUE](#), the [Planning and Building Department Planning Department](#) prepares an inventory of local water supplies, ~~sewage-wastewater~~ disposal facilities, air quality, parks, schools, and road and freeway interchange capacities for each area and community plan, as applicable. The inventories are developed jointly with the Public Works and Health Departments, Regional Water Quality Control Board, Air Pollution Control District, [water purveyors](#), and other responsible agencies. The inventories should:

1. Identify existing resources, their location, estimated quantity and quality,
2. Describe known problem areas or deficiencies,
3. Estimate ~~threshold~~ populations that an existing resource can support,
4. Identify alternative or additional available resources, where known,
5. Estimate the lead time needed for correcting a previously identified deficiency,
6. Identify ~~feasible~~ capital projects or other programs that can ~~realistically~~ be funded ~~or and~~ implemented within critical time periods.

Resource inventories are based upon the most current information available. However, the data for some areas of the county are of limited availability. ~~Consequently, the area plan inventories can be used for some areas to indicate where problems may exist, and how priorities should be set for needed resource capacity studies.~~ The area and community plans indicate whether resource data mentioned are immediately usable for resource management purposes, or whether additional information is needed. Consequently, the area plan inventories can be used for some areas to indicate where problems may exist, and how priorities should be set for needed resource capacity studies.

Any resource data used as the basis for general plan policies is periodically reviewed and updated as new information ~~becomes available requires,~~ through the LUE update program, capital improvement program review and RMS monitoring programs.

Monitoring Program

The ~~Department of Planning and Building~~ Planning Department collects data, ~~and~~ monitors resource usage, ~~to~~ updates earlier resource inventories, and identifies ~~progress needed to implement~~ possible corrective measures to address resource capacity issues. Status reports are part of the Biennial Resource Summary Report described below. Each report should include the following:

1. A brief synopsis of the ~~problem~~status of resource use,
2. Any additional resource information,
3. Current and projected capacities,
4. An analysis of corrective actions, and
5. Recommendations for action.

Resource Capacity Advisory Process

When the ~~Planning and Building~~ Department determines that ~~a~~ level of severity should be established, ~~increased or reduced or modified~~ as a consequence of an LUE update, the RMS monitoring program, ~~a Water Resource Advisory Committee recommendation or input from an agency or entity responsible for management of a resource~~, or the Biennial Resource Summary Report, it sends ~~an advisory~~ memorandum to the Board of Supervisors ~~advising it of the need to establish or modify to verify the situation and determine if a level of severity exists and what that level should be.~~ An illustration of the advisory process is shown in Figure 3-1.

The Board of Supervisors will conduct a public hearing(s) to review the data received from the Planning Department. upon which a level of severity is based. After the initial advisory ~~memorandum~~, it may be necessary to continue to issue status reports to the ~~Board~~Board of Supervisors, in order to keep ~~it~~ the Board of Supervisors advised of the situation. Implementation of a program (i.e., a public works project, management techniques, etc.) would then occur only after public hearings on the ~~validity of~~ resource information being used, preparation of a resource capacity study, and action by the ~~Board~~Board of Supervisors, including the adoption of ordinances if necessary, to address specific community resource problems.

If an affected resource is not under County jurisdiction (e.g., a community service district may have responsibility over a local water supply problem), the ~~Department of Planning and Building~~Planning Department sends a copy of the advisory ~~memorandum~~ to the responsible agency advising that a potential problem may exist, based upon data available to the County, and to urge that the agency prepare a resource capacity study. ~~Staff contacts and recommendations to the agency should occur in advance of the agency's budget preparation process so the necessary work can be included in it's financial considerations.~~

(Amended 1990, Ord. 2443). recommend not putting these ordinance references within this document. It does not appear that it has been consistently used and this omitting them will not distract from the outcome.

The following sections describe in more detail the procedures for considering and reporting each of the three levels of severity (LOS):

- Level LOS I: —Resource capacity ~~problem~~concern
- Level LOS II: —Diminishing resource capacity
- Level LOS III: —Resource capacity ~~met or exceeded~~deficiency

Levels of severity are recommended by the ~~Planning and Building Department~~Planning Department and certified by the Board of Supervisors through the following procedures. County staff may recommend to the Board of Supervisors or the ~~Board~~Board of Supervisors may initiate specific actions to respond to levels of severity, such as special water conservation ordinances and special land use and growth limitation measures.

However, such measures can only be implemented following specific approval by the ~~Board~~Board of Supervisors at a public hearing.

Level HLOS I: Resource Capacity Problem Concern

Level of Severity I occurs when resource use will reach capacity in the time required to expand capacity.

~~Level of Severity~~LOS I is the earliest indication that a potential resource capacity problem exists or is anticipated. Its threshold is intended to be early enough to provide time to avoid a resource ~~capacity issue, crisis with minimum impact on the development process.~~ Level LOS I occurs at the point where is established when resource use will reach capacity in approximately the time required to expand capacity (including planning, funding and construction of a project where appropriate). Critical time periods for Level HLOS I problems for each resource are summarized in Tables F through J (Amended 1990, Ord. 2443).

Under normal circumstances, community development is intended to continue through a Level HLOS I condition without any restrictions being enacted. Projects should still be evaluated without the Level HLOS I determination affecting them, unless otherwise directed by the Board of Supervisors.

Level HLOS I Procedure

When available data suggest a resource problem exists or is anticipated, the following procedure is to be used:

1. Staff forwards an advisory memorandum to the Board of Supervisors (with copies to the Planning Commission for their information). The memorandum identifies the capacity problem and enables the ~~Board~~Board of Supervisors to review the data upon which the staff recommendation is based.
2. If the ~~Board~~Board of Supervisors agrees that a ~~potential~~ resource ~~problem capacity issue concern~~ exists, it initiates preparation of a resource capacity study, if necessary. The ~~Board~~Board of Supervisors may also ~~wish to initiate,~~ through an ordinance, any conservation measures deemed necessary, ~~to partially relieve existing burdens on the affected.~~
3. Preparation of a resource capacity study, if necessary, should be undertaken by the County department or outside agency providing the particular service or resource being considered, in cooperation with the County and any other affected agencies (such as public or private water companies, sewer districts, community service districts, school districts and incorporated cities). A resource capacity study should:
 - a. Determine the capacity of the resource being studied;
 - b. Identify thresholds for Level HLOS II and III ~~deficiencies~~;
 - c. Identify alternate measures for avoiding a predicted resource ~~deficiency limitation~~ and evaluate the feasibility (and possible funding methods) of each measure;
 - d. Provide an estimated timetable for funding and completion of a public works project to correct the resource deficiency, if applicable;
 - e. Recommend techniques for growth management to be used, if needed, to extend the resource capacity ~~ies~~.
4. Upon completion, a resource capacity study is forwarded to the Planning Commission for public hearing. The Planning Commission reviews study data and recommends to the Board of Supervisors as to its adequacy. The Planning Commission review should be completed and reported to the Board of

Supervisors within a maximum of 40 days from when the study is first placed on the Planning Commission's agenda.

5. Upon receipt of the Planning Commission recommendation, the Board of Supervisors holds a public hearing to review the resource capacity study, consider public testimony, determine whether a Level of Severity LOS I and the study should be certified, and implement the actions recommended in the study. The ~~Board~~ Board of Supervisors should determine whether the study adequately assesses the affected resource as a basis for policy decisions. The data in the certified resource capacity study is then incorporated into the County General Plan as new resource data at the next available time for processing general plan amendments.

(Amended 1990, Ord. 2443).

Level HLOS II: Diminishing Resource Capacity

A Level of Severity LOS II ~~occurs~~ is established when the current rate of resource use will deplete the resource before its capacity can be increased. When this condition occurs, the rate of resource ~~depletion-use~~ must be decreased to avoid exceeding the resource capacity. This may be accomplished through developing a capital project that will provide for increased resources through infrastructure improvements, or through conservation of the resource, or through other growth management techniques, or finally through a combination of any of several methods.

~~Level of Severity II occurs when the rate of resource depletion must be decreased to avoid exceeding the resource capacity.~~

If a funding decision cannot be made, for a variety of reasons, the Board of Supervisors may choose to ~~implement-enact~~ development measures to increase the lead time for avoiding the deficiency.

When the Board of Supervisors finds that a resource deficiency has been corrected, any ordinance that enacted development ~~restrictions-measures~~ should be repealed or allowed to expire. Applications would then be processed and reviewed as normal.

(Amended 1990, Ord. 2443).

Level HLOS II Procedure

At this level, staff [be specific – unclear as to what “staff” this is referring to? Is it Planning Department staff? Or some other staff from some other department?] advises the Board of Supervisors and the Planning Commission when the capacity of a particular resource is diminishing past the point of merely being a ~~potential~~ problemconcern. The basis for this recommendation may come from completion of a previously ordered resource capacity study, monitoring program, Biennial Resource Summary Report, or information developed for the Land Use ElementLUE update.

(WRAC Comment – the protocols described herein seem overly time consuming. Suggested that these be reviewed for more streamlining) The ~~Department of Planning and Building~~ Planning Department forwards an advisory ~~memomemorandum~~ to the Board of Supervisors. Upon review of the Level HLOS II advisory memorandum, the ~~Board~~ Board of Supervisors evaluates ~~the validity of~~ the data upon which the recommendation is based, and forwards the ~~memomemorandum~~ to the Planning Commission for a public

hearing on the recommendation. The ~~Board~~Board of Supervisors may also initiate a resource capacity study if more complete information is needed.

If the advisory ~~mem~~memorandum is sent to the Planning Commission for a public hearing, ~~it then the~~ Planning Commission recommends an appropriate course of action to the Board of Supervisors. The Planning Commission review must be completed and reported to the ~~Board~~Board of Supervisors within a maximum of 40 days from the time the matter is placed on the Planning Commission agenda.

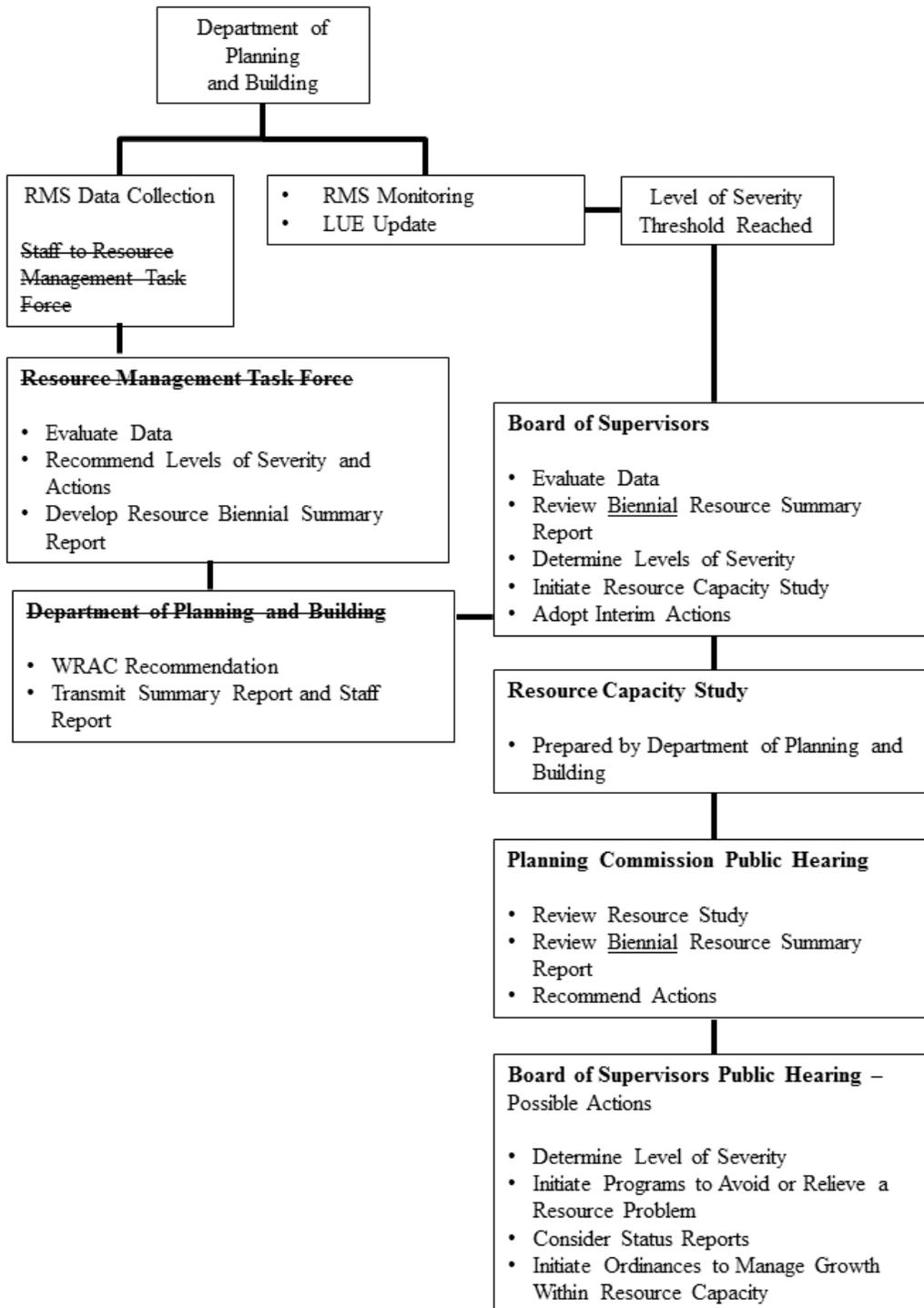
Upon receipt of the Planning Commission recommendation, the Board of Supervisors holds a public hearing to consider relevant resource data and public testimony, determine whether to establish a Level of Severity~~LOS~~ II and the resource capacity study should be certified, and implement the actions recommended in the study.

If the ~~Board~~Board of Supervisors determines that the conditions required to establish a Level I~~LOS~~ II does not exist, staff is directed to either continue monitoring the resource and report back to the ~~Board~~Board of Supervisors; terminate monitoring; or take other action the ~~Board~~Board of Supervisors finds appropriate.

Figure 3-1

RESOURCE MANAGEMENT PROCESS

Delete the “WRAC Recommendation” from this chart, and footnote within the chart that the WRAC is involved in water resource matters (alternatively, develop a generalized term for “advisory bodies” and use the generalized term instead). In box titled “Board of Supervisors, add “, if needed” behind “Adopt Interim Actions”. Place a list of abbreviations on this figure (RMS, LUE, etc). Place the bullets from the lower left box within the box above it. If protocols for review are modified, then also modify the flowchart.



Level HLOS III: Unavoidable Resource Capacity Deficiency

~~This is the most critical level of concern. Level HLOS III occurs is established~~ when the capacity ~~(maximum safe yield)~~ of a resource has been determined to be deficient ~~met or exceeded~~. At ~~Level HLOS III~~, there is a deficiency of sufficient magnitude that ~~drastic immediate~~ actions may be needed to protect public health and safety. While the intention of the RMS is to avoid reaching ~~Level HLOS III entirely through a prior series of advisory memos~~ through the proactive management of a resource, it is still possible that such a situation may occur.

Level of Severity III occurs when the capacity of a resource has been met or exceeded.

Level HLOS III Procedure

The procedure for a Level HLOS III alert is as follows:

1. An advisory ~~memomemorandum~~ is sent to the Board of Supervisors for consideration and referral to the Planning Commission. ~~as in the Level HLOS II procedure. The basis of this memorandum shall come from completion of a previously ordered resource capacity study, monitoring program, Biennial Resource Summary Report, or information developed from the LUE update. The Board of Supervisors evaluates the advisory memorandum and the data upon which it is based. The Board of Supervisors should consider whether there is a need to adopt appropriate interim actions, to avoid panic or speculation on the outcome of the RMS procedure. The advisory memorandum is forwarded by the Board of Supervisors to the Planning Commission for a public hearing on the recommendation(s) presented within the advisory memorandum. The Board of Supervisors may also initiate an update or revision to the resource capacity study if more complete information is needed.~~
2. The Planning Commission holds a public hearing on the advisory ~~memomemorandum~~. ~~As at Level HLOS II, the~~ The Planning Commission has a maximum of 40 days to hold the public hearing and report to the ~~Board~~ Board of Supervisors.
3. After receiving the Planning Commission report, the ~~Board~~ Board of Supervisors holds a public hearing to consider relevant resource data and public testimony, determine whether Level of Severity LOS III and the resource capacity study should be certified, and consider the implementation of the actions recommended in the study.

If ~~Level III~~ the conditions needed to establish a LOS III is are found not to exist, the ~~Board~~ Board of Supervisors may direct staff to: maintain Level HLOS II procedures; modify Level HLOS II findings, or take ~~whatever~~ other action ~~is~~ deemed necessary by the ~~Board~~ Board of Supervisors.

Resource Management System Coordination

Resource inventories and resource capacity studies should clearly describe needed short and long-term capital improvement programs ~~of affected agencies that can improve the availability of the resource. Detailed feasibility studies need to be funded by the Board of Supervisors and/or other affected agencies to evaluate alternatives and make recommendations for the preferred capital improvement program(s) that can be permitted, funded, and constructed, to indicate feasible projects that can be funded realistically~~ within critical time periods. ~~The studies also should be coordinated with the urban service and urban reserve lines in the Land~~

~~Use Element LUE.~~

Resource capacity studies are to be forwarded to the Local Agency Formation Commission (LAFCO) for its use when considering requests for expansion of spheres of influence and spheres of service, or when considering proposed annexations to any incorporated cities. Because LAFCO definitions of "sphere of service" and "sphere of influence" correspond to the LUE definitions of urban service line and urban reserve line, respectively, such coordination is necessary to support orderly urban expansion.

Coordination between service agencies and the LUE is ~~actually~~ mandated by the Government Code (Section 65401) requirement that agencies involved in evaluating, planning or constructing major public works annually provide the County with a list of their proposed projects. The County must then prepare "...a coordinated program of proposed public works for the ensuing fiscal year." The coordinated program is then submitted to the County Planning Commission for review and a report "...as to conformity with the adopted general plan or part thereof." Participation of relevant service agencies and companies in the RMS is encouraged to coordinate solutions to resource problems, particularly through the capital improvement program process, also described in Chapter 8.

F. RESOURCE MANAGEMENT ISSUES, CRITERIA FOR LEVELS OF SEVERITY, AND RECOMMENDED ACTIONS

Resource Management Techniques

The ~~central~~ methods used in the management of new growth are a) the distribution of land use categories in the [Land Use Element LUE](#), b) development standards in the [Land Use Ordinance LEO](#) which are intended to ensure compatibility between different types of land use, and c) establishment of growth limitations in the Growth Management Ordinance, Title 26 of the County Code. ~~However, it~~ It is important to recognize that the County often does not have authority over the resource or service in question, ~~and, in~~ in these instances, collaboration with other agencies is essential to conserving or expanding the resource. Issues of water supply, wastewater and water systems will almost always include cooperative approaches between the County (with authority over land use and building) and the service provider (with authority over provision of water or wastewater service).

The capital improvement program also plays an important role in growth management because it determines the timing of new or expanded public facilities (such as roads, water supply and ~~sewage wastewater~~ disposal systems) which enable new development at the densities planned by the [Land Use Element LUE](#). There are also a variety of ~~other~~ growth management techniques which may be appropriately used by local governments where resource limitations affect the normal operation of the private land development process.

The [Land Use Element LUE](#) is not intended to predetermine which techniques would be appropriate in a specific situation, since ~~individual problem circumstances~~ [resource capacity problems](#) can vary widely. The choice of any implementing actions is made by the Planning Commission and Board of Supervisors based on ~~a~~ [the](#) particular resource [capacity](#) problem. ~~Implementation of restrictions will occur after a public hearing and adoption of an ordinance to enact specific measures in a defined area. Techniques for correcting local problems are evaluated in the area plan resource inventories, advisory memos and resource capacity studies prepared at Levels I, II and III.~~

~~Some representative examples of methods that could be used to conserve resources and effectively intervene in~~

~~different situations are summarized in the following list:~~

~~Density limitations to limit the number of people that could potentially reside in an area.~~

~~Building intensity or use limitations that would limit the potential scale and intensity of nonresidential development.~~

~~Target ceiling for the maximum population that could reside within resource capacities, with a limit on the corresponding number of building permits.~~

~~Controls on the rate of new development and subdivisions to provide more lead time for resource management decisions and for funding to be programmed where it is feasible, by limiting the annual number of permits, or to sustain growth longer under a population ceiling.~~

~~Phasing policies on the extension of services such as sewage disposal, and on recommended annexations.~~

~~Locating public improvements to influence the location and direction of growth where resources are identified to be more adequate.~~

~~Scheduling public capital expenditures to influence growth into more desirable areas with resource availability.~~

~~Acquisition or transfer of development rights to relocate previously allowable development into other areas with more adequate resources.~~

~~Development impact fees to provide funding for necessary public facilities that will minimize the impacts of growth.~~

~~Revising the metric or timeframe being measured (e.g. Avila Beach Drive traffic count).~~

~~If a growth management limitation is considered as an amendment of the county's general plan or its enacting ordinances (Land Use Ordinance and Subdivision Ordinance), the Government Code requires specific findings concerning the efforts the county is making to implement its Housing Element and the public health, safety and welfare considerations that justify reducing the housing opportunities of the region (Government Code Section 65302.8). The State's zoning and subdivision laws include provisions that cities and counties implementing these State laws through enacting ordinances and other actions must consider their effects upon the housing needs of the region (Government Code Sections 65863.6, 65913.2, and 66412.2). The laws further require cities and counties to balance the housing needs of the region against the needs of their residents for public services and the available fiscal and environmental resources (Government Code Sections 65863.6 and 66412.2).~~

General Recommended Actions for Levels of Severity

When the Board of Supervisors finds that a level of severity exists, it considers and institutes the following or other actions as needed. These general actions are in addition to the more specific recommended actions for each resource as listed in the following section.

Level I LOS Recommended Action Requirements

If sufficient progress is not made toward alleviating the level of severity, the Board of Supervisors may adopt

an appropriate action such as the following (Amended 1990, Ord. 2443):

1. Funding of projects necessary to address the resource problem.
2. In the case of special districts, recommend to LAFCO that annexations that increase demand for the affected resource address the resource problem prior to approval (Amended 1990, Ord. 2443). ~~(Existing language, moved from Section E);~~
3. The ~~Board~~ Board of Supervisors may impose conservation measures within the service area (Amended 1990, Ord. 2443). ~~(Existing language, moved from Section E);~~

Level II Recommended Action Requirements

~~In addition to the preceding a~~ Action requirements in addition to those for Level I, the ~~Board~~ Board of Supervisors may adopt land use policies that respond to a delay in funding for a necessary project such as the following (Amended 1990, Ord. 2443): ~~(Existing language, moved from Section E);~~

1. Manage the rate of resource ~~depletion-use~~ within the affected community or area to extend the availability of the resource until such time as the project will provide additional resource capacity (Amended 1990, Ord. 2443).
2. Initiate appropriate financing mechanisms to recover the project cost including, but not limited to, capital improvement bonds, assessment districts, developer fees, etc. (Amended 1990, Ord. 2443).
3. Use RMS information to evaluate the appropriate scale and timing of discretionary projects within the remaining resource capacity to determine whether they should be approved (Amended 1990, Ord. 2443).
4. Enact restrictions on further land development in the area that is affected by the resource problem (Amended 1990, Ord. 2443).
5. Enact adjustments to land use categories so that they will accommodate no more than the population which can be served by the remaining available resource, or redirect growth to communities or areas that have available resource capacity (Amended 1990, Ord. 2443). ~~(Existing language, Items 4-5 moved from Section E)~~
- ~~6. 6. —~~ Give a higher priority to serving existing and strategically planned communities with adequate resources, streets and infrastructure, ~~over outlying rural areas.~~
- ~~7. Accelerate the implementation of capital improvement programs to add more resources to the affected area.~~

Level III Recommended Action Requirements

~~In addition to the preceding actions~~ Action requirements in addition to those for Levels I and II, the ~~Board~~ Board of Supervisors may institute measures such as the following:

1. Institute appropriate measures, ~~(including capital improvement programs,)~~ to correct the critical resource deficiency, or at least restore Level II so that severe restrictions will be unnecessary. In many cases, other agencies or districts will control decisions about necessary measures. The Board of Supervisors shall only seek cooperative assistance for a certain time period, beyond which measures

may be considered to enact County ordinances or standards affecting resource usage such as development restrictions.

2. Adopt growth management or other urgency measures to initiate whatever restrictions are necessary to minimize or halt further resource ~~depletion~~use. ~~Any such restrictions enacted by other means shall be reduced or removed only~~ after a public hearing where the Board of Supervisors ~~determines~~ makes findings that support the reduction and/or removal of restrictions where that Level III LOS III no longer exists ~~and~~ or any dangers to public health or safety have been eliminated.
3. Enact a moratorium on land development or other appropriate measures in the area that is affected by the resource ~~problem~~ issue until such time that ~~the capital improvement project(s) and/or programs~~ provides additional resource capacity to support ~~such~~ development (Amended 1990, Ord. 2443; 1995, Ord. 2740).

Issues, LOS Criteria and Recommended Actions by Resource

~~As resources are studied to identify their capacities and rates of use, several countywide resource policy issues become apparent. Their importance demands careful scrutiny and evaluation of alternatives. While the RMS has been designed to support improvement of local situations, long-term solutions may not be possible unless broader issues are also resolved.~~

~~Those issues are presented here only to indicate some of the major resource questions that will be facing the county in the near future. More specific resource capacity information is included in the area plans. This chapter, including the following descriptions of those issues, shall not [s] be considered in evaluating individual development proposals or questions of land division consistency.~~

Each ~~type of~~ resource has unique characteristics that require a ~~different~~ varied approach to establishing the levels of severity ~~for it~~. This section describes the regional policy issues for resources. ~~In addition, for each resource, this~~ This section describes the criteria to be used to identify when each level of severity is reached, together with recommended actions. Each resource topic also includes recommended subjects for resource capacity studies that will be prepared through the RMS advisory process.

WATER SUPPLY

Policy Issues

~~Water resources have long been a widespread concern in the county. Like many areas of California, rainfall is sparse through most of the year and average rainfall varies widely depending on location and elevation. Our water supply is dependent on this varying amount of rainfall each year. The county's water supply can be divided into three broad sources:~~

~~The County's water resources can be classified into the three categories below. All of these resources are~~ The water resources that serve the County are replenished through rainfall, the amount of which can vary significantly from year to year, or through the utilization of imported water supplies.

1. Local groundwater basins (~~e.g. Los Osos, Santa Maria, Paso Robles~~);
2. Local surface water storage and associated distribution facilities (~~Lopez Lake; Whale Rock reservoir,~~

3. ~~Santa Margarita Lake, Lake Nacimiento); and~~
State Water Project.

~~Water supplies in the county often are not geographically located in areas of water demand, and water delivery systems are not completely interconnected. Excess water in one part of the county often cannot reach those areas where it is needed, without water transfers or system upgrades.~~

~~The County has limited authority to directly regulate the use of water; other tools must be identified and used to address water supply issues. Land use controls alone are often ineffective water management tools because they only impact new development.~~

~~The most basic policy issues in the~~ Refer to the Conservation and Open Space Element ~~and Agricultural Element of the County General Plan and the Framework for Planning for the most current policies and guidelines related regarding county to water resources. are:~~

1. ~~Efficient use of our existing water supplies;~~
2. ~~Identifying new water resources that can be developed;~~
3. ~~Maintaining groundwater for agricultural purposes per AGP11 in the Agriculture Element; and~~
4. ~~Improving how water is distributed.~~



~~[DELETE THE WATER SPLASHING PHOTO]~~

~~The Conservation and Open Space Element of the County General Plan (COSE) guides what new water resources should be developed. It prioritizes water efficiencies over development of new water supplies.~~

~~The policies in the COSE state:~~

- a. ~~Development of new water supplies should focus on efficient use of our existing resources.~~
- b. ~~Use of reclaimed water, interagency cooperative projects, desalination of contaminated groundwater supplies, and groundwater recharge projects should be considered prior to using imported sources of water or seawater desalination, or dams and on-stream reservoirs.~~
- c. ~~Water from surface water projects (e.g. Lopez Lake, Santa Margarita Lake, Lake Nacimiento) will only be used to serve development within urban and village reserve lines and will not be used to serve development in rural areas.~~

~~In order to achieve strategic growth, adequate services such as water and wastewater need to be available in the urban areas where development is encouraged.~~

~~In support of the basic policy issues above and in order for continued development in the unincorporated area to be consistent with these policies, Chapter 1 of the Framework for Planning describes strategic growth and its eleven planning principles.~~

~~Strategic growth is a compact, efficient and environmentally sensitive pattern of development that provides people with additional travel, housing and employment choices. It focuses future growth away from rural areas~~

~~and limited resources, closer to existing and planned job centers and public facilities where sustainable resources are available.~~

~~The General Plan acknowledges that groundwater is vital to the continued success of the agricultural sector. A policy in the Agriculture Element of the General Plan states:~~

~~AGP11: Agricultural Water Supplies:~~

~~a. Maintain water resources for production agriculture, both in quality and quantity, so as to prevent the loss of agriculture due to competition for water with urban and suburban development.~~

~~The policies mentioned above work cooperatively to:~~

- ~~1. Maintain groundwater for agriculture.~~
- ~~2. Ensure water service is available to the urbanized areas of the county; and~~
- ~~3. Support efficient use of water resources.~~

~~The question of agricultural and urban water use is likely to become more important over time because urban and agricultural users most often draw from a single groundwater source, and agriculture generally requires significantly more water than urban use. The Conservation and Open Space Element includes a policy that groundwater management strategies give priority to agricultural operations. However, where a change in the distribution of water does not adequately provide for agricultural production, it may be appropriate to consider a change of the land use category to allow non-agricultural uses.~~

~~Water supplies in the county often are not geographically located in areas of water demand, and water delivery systems are not completely interconnected. Excess water in one part of the county often cannot reach geographic areas where it is needed, without water transfers or system upgrades.~~

~~Besides water conservation, management of the location, density and rate of development can minimize the increased use of groundwater and provide lead time for developing supplemental sources. However, land use controls alone are often ineffective water management tools because they only impact new development.~~

~~The county's three primary groundwater basins that provide water to urban, rural and agricultural users are all designated Level of Severity III: Los Osos, Santa Maria (only the portion known as the Nipomo Mesa Water Conservation Area), and Paso Robles). The resource capacity studies prepared for these basins identified multiple users of each basin: urban, rural and agricultural. Because the County's authority to directly regulate the use of water is limited, other tools must be identified and used to address water supply issues. The response to the LOS designation has been similar in each basin: 1) institute land use measures that allow continued urban development without increasing water demand; 2) develop an overall management plan to address water problem over the long term; and 3) implement water conservation programs.~~

~~While it is important to carefully analyze the water problems and potential solutions through the preparation of a resource capacity study, this process can take a long time to complete. In the meantime, water supply and demand can become more unbalanced, leading to groundwater basin overdraft or growing system reliability issues. The resource capacity study process can address this problem by looking at a series of standard solutions that are used in other areas of the county.~~

Water Supply Level of Severity Criteria and Recommended Actions

Table F
 Water Supply: Level of Severity Criteria and Recommended Actions
(All Info moved from text to table form)

Level of Severity	Criteria	Recommended Actions
I	Water demand projected over 20 25 15 years equals or exceeds the estimated dependable supply. <u>Level H/LOSI</u> provides five years for preparation of resource capacity studies and evaluation of alternative courses of action	Institute a vigorous and verifiable water conservation program, <u>if needed.</u>
II	Water demand projected over <u>15 to 20</u> 20 10 years (or other lead time determined by a resource capacity study) equals or exceeds the estimated dependable supply.	1. Require replacement with low-flow fixtures on sale or remodel of properties. 1. Institute a vigorous and verifiable water conservation program. 2. Develop a written plan for actions to be implemented to address the situation. 3. <u>Evaluate projects and programs that will increase water supply and/or reduce water demand.</u>
III	Water demand projected over <u>15</u> 7 years (or other lead time determined by a resource capacity study) equals or exceeds the estimated dependable supply OR The time required to correct the problem is longer than the time available before the dependable supply is reached.	1. <u>Institute a vigorous and verifiable water conservation program.</u> 2. <u>Either cease issuing building permits in the affected area or establish a program of water offsets that requires a measurable and sustainable minimum of 2:1 water reduction in the affected area as a condition of issuing a permit.</u> 3. <u>Make mandatory that all new groundwater wells, or rehabilitated or replaced wells, have water meters installed, and records of use be maintained by well owners and reported at the request of the Board of Supervisors.</u> 2. Require replacement with low-flow fixtures upon sale or remodel of properties. 4. Institute a vigorous and verifiable water conservation program. 5. Begin implementation of an action plan. 6. <u>Implement or continue</u>

		<u>implementation of projects and programs which will increase water supply and/or reduce water demand.</u>
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Water Supply Resource Capacity Study

A Resource Capacity Study should: 1) inventory existing water resources available to the agency operating the system and/or within the groundwater basin boundaries; 2) document existing demand for water by all area user-groups; ~~and~~ 3) explore any conservation measures that could reasonably be imposed by the water agency or applicable regulatory authority; and 4) identify water sources that may be connected or transferred to areas in need.

The analysis of water resource deficiencies and potential solutions through the resource capacity study process can take significant time to complete. During this process, water supply and demand can become more unbalanced; therefore, the water resources management system should be considered a top priority for long range planning.

~~Water supply studies have been conducted since 2008 for the Los Osos, Santa Maria (Nipomo Mesa Management Area) and Paso Robles groundwater basins. Los Osos is in the process of court-ordered adjudication, and the Nipomo Mesa Management Area has been adjudicated. The adjudications have resulted in cooperative groundwater management plans and discussion of importing supplemental water.~~ [22]

~~The County's authority to regulate extractions from groundwater basins is limited, so it instead uses its land-use and building permit authorities to address new development's demand for water.~~

Water Systems: Level of Severity Criteria and Recommended Actions

~~(I think we need some background in here about the differences between "Water Supply" and "Water Systems"- it is not clear what the difference are and why the criteria are so different)~~

A water system, as referred to herein, is a functioning piece of infrastructure that delivers water to an end user. The water may be either potable or non-potable depending on the needs of the end user. Examples of components associated with a water system include, but are not limited to, extraction groundwater wells, well-head treatment facilities, pumping stations, water treatment facilities, water storage tanks (steel, concrete, fiberglass, earthen, etc.), piping conveyance systems, canal conveyance systems, dams and associated appurtenances, backflow preventers, pressure regulating structures, groundwater storage and banking facilities, recycled water infrastructure associated with wastewater treatment facilities, or groundwater recharge facilities (direct recharge via surface facilities or down-hole well recharge, and in-lieu recharge).

Table G
Water Systems: Level of Severity Criteria and Recommended Actions
(All Info moved from text to table form)

Level of Severity	Criteria	Recommended Actions
I	The water system is projected to be operating at the design capacity within seven years. Two years would then be	Institute a vigorous and verifiable water conservation program, <u>if</u>

	available for preparation of a resource capacity study and evaluation of alternative courses of action.	<u>needed.</u>
II	A five-year or less lead time (or other lead time determined by a resource capacity study) needed to design, fund and construct system improvements necessary to avoid a Level III <u>Level III</u> problem.	1. Require replacement with low-flow fixtures on sale or remodel of properties. 1. Institute a vigorous and verifiable water conservation program. 2. Develop a written plan for actions to be implemented to address the situation.
III	Water demand equals available capacity: a water distribution system is functioning at design capacity or will be functioning at capacity before improvements can be made. The capacity of a water system is the design capacity of its component parts: storage, pipelines, pumping stations and treatment plants.	<u>1. Institute a vigorous and verifiable water conservation program.</u> 2. Either cease issuing building permits in the affected area or establish a program of water offsets that requires a measurable and sustainable minimum of 2:1 water reduction in the affected area as a condition of issuing a permit. 2. Require replacement with low-flow fixtures upon sale or remodel of properties. 3. Institute a vigorous and verifiable water conservation program. 3. Begin implementation of an action plan.

WASTEWATER

COMMENT - The WRAC noticed that this section does not discuss recycled water at all. Rather than the subcommittee take on this topic and place verbage herein, we have left this to the Planning Department to consider and add. The WRAC's position is that recycled water is an extremely important component to the future water portfolios of our communities, and thus should be appropriately addressed.

Policy Issues

As our communities are expected to handle a majority of the unincorporated area's population growth, installation and maintenance of wastewater facilities (including collection and disposal) is a vital link in the county's infrastructure.

Delete the photograph.

~~Wastewater treatment and disposal can affect such resources and services as water quality, community development and groundwater recharge.~~ The county's urban areas rely chiefly on wastewater treatment plants that in many cases recharge groundwater basins with treated effluent. The rural areas of the county (and a very limited number of urban and village areas) rely on septic tank and leach field disposal methods. Similar to wastewater treatment plants, leach fields can also recharge groundwater ~~basins~~. These benefits of wastewater service need to be maintained when new or expanded wastewater treatment facilities are planned.



~~Expanded wastewater service can have two divergent effects on water supply. Wastewater treatment, collection and disposal facilities can affect both quality and quantity of groundwater. Wastewater effluent can be used in lieu of potable water sources for outdoor landscaping, agricultural irrigation, and groundwater recharge. If wastewater treatment is not appropriate for the site or density of development, it can have negative groundwater quality effects (e.g. nitrates).~~

~~A second group of concerns relating to wastewater treatment and disposal involves urban infill development and expansion. A new or expanded wastewater system can induce growth into areas not planned for higher densities. On the other hand, a lack of wastewater facilities can prevent strategically planned infill development or expansion of communities. It is important to consider that growth potential can be created if sewers are constructed where none formerly existed. Decisions to construct major sewer trunk lines or treatment facilities can have substantial impacts on lands traversed by new lines or in proximity to a treatment plant. The growth-inducing effects of such facility improvements must be considered in ongoing planning efforts to enable conscious land use policy decisions about the potential long-range effects of facility improvements. The extension of sewers into heretofore unsewered areas should occur in a manner consistent with the Strategic Growth Principles of the Framework for Planning~~

The County does not generally have authority over wastewater treatment and disposal facilities (except in isolated cases). ~~Therefore, it is important for~~ but the County ~~to closely~~ reviews wastewater project proposals by other agencies. Review and coordination enables the County to anticipate and accommodate or mitigate the effects of such projects. Such review is possible through a cooperative approach with the Regional Water Quality Control Board (RWQCB).

The RWQCB issues permits for wastewater treatment and disposal facilities. Wastewater discharges to surface waters require a National Pollutant Elimination System (NPDES) Permit. Treated wastewater discharges using land disposal are regulated using permits referred to as ~~These permits are referred to as~~ "Waste Discharge Requirements (WDRs)." These permits have standard requirements that include submittal of a technical report prepared with public participation and reviewed and approved by all agencies having jurisdiction over the waste collection, treatment, or disposal facilities. -state:
"...required technical report shall be prepared with public participation and reviewed, approved and jointly submitted by all planning and building departments having jurisdiction in the area served by the waste-collection, treatment, or disposal facilities".

The required technical report includes:

- a) the best estimate of when the monthly average daily dry weather flow rate will equal or exceed design capacity; and,
- b) a schedule for studies, design, and other steps needed to provide additional capacity for waste treatment and/or disposal facilities before the waste flow rate equals the present design capacity.

Wastewater: Level of Severity Criteria and Recommended Actions

Table H
Wastewater: Level of Severity Criteria and Recommended Actions
(All Info moved from text to table form)

Level of Severity	Treatment Plant Criteria	Recommended Actions
I	The service provider or RWQCB determines that monthly average daily flow will or may reach design capacity of waste treatment and/or disposal facilities within 4 years. This mirrors the time frame used by the RWQCB to track necessary plant upgrades.	Discuss progress on necessary plant expansions with the service provider and/or the RWQCB. The purpose of the discussions is to ensure continued availability of wastewater service for development projects that are consistent with County General Plan policies, including strategic growth and affordable housing projects.
II	RWQCB determines that the monthly average daily flow will or may reach design capacity of waste treatment and/or disposal facilities within 2 years.	Discuss progress on necessary plant expansions with the service provider and/or the RWQCB. The purpose of the discussions is to ensure continued availability of wastewater service for development projects that are consistent with County General Plan policies, including strategic growth and affordable housing projects.
III	Peak daily flow equals or exceeds the capacity of a <u>sewage wastewater</u> system for treatment and/or disposal facilities.	Support RWQCB actions that seek to expand plant capacities and reduce levels of severity. Use appropriate growth management techniques to ensure continued availability of services for projects consistent with the County General Plan (e.g. strategic growth and affordable housing projects).
<u>Sewage Wastewater</u> Collection System Criteria		
I	2-year projected flows equal 75% of the system capacity. A 2-year period is recommended for the preparation of resource capacity study.	Discuss progress on necessary system upgrades with the service provider.
II	<ul style="list-style-type: none"> • System is operating at 75% capacity OR • The five-year projected peak flow (or other flow/time period) equals system capacity OR • The inventory of developable land in a community would, 	Discuss progress on necessary system upgrades with the service provider.

	if developed, generate enough <u>sewagewastewater</u> to exceed system capacity.	
III	Peak flows fill any component of a collection system to 100% capacity.	Discuss progress on necessary system upgrades with the service provider.
1. A <u>sewagewastewater</u> collection system includes facilities that collect and deliver <u>sewagewastewater</u> to a treatment plant for treatment and disposal (sewer pipelines, lift stations, etc.)		

Wastewater: Resource Capacity Study

A Resource Capacity Study is prepared by the ~~Department of Planning and Building~~ Planning Department with the assistance of the service provider and the RWQCB. The study should:

- Inventory annual flows into the sewagewastewater treatment plant;
- Identify any additional capacity consistent with anticipated growth projections that may be available for new connections without creating water quality problems;
- Determine potential effects of water consumption reductions on long-term plant capacity;
- Estimate timing of plant expansion.

Table I
Septic Tank Systems: Level of Severity Criteria and Recommended Actions
(All Info moved from text to table form)

Level of Severity	Criteria	Recommended Actions
I	<u>Failures occur in 5% of systems in an area or other number sufficient for the County Health Department and/or the RWQCB to identify a potential public health problem.</u>	<u>Consult with County Health Department and RWQCB on actions and monitor.</u>
II	<u>Failures reach 15% and monitoring indicates that conditions will reach or exceed acceptable levels for public health within the time frame needed to design, fund and build a project that will correct the problem, based upon projected growth rates.</u>	<u>Evaluate alternatives to septic systems such as a public sewer system, a community septic system maintenance program, or a collection and disposal system to existing on-site treatment tanks.</u>
III	Failures reach 25% of the area's septic systems and the County Health Department and RWQCB find that public health is endangered.	Design, fund and construct a public sewer system or a collection and disposal system to existing on-site treatment tanks. Initiate a septic system maintenance program.
II	Failures reach 15% and monitoring indicates that conditions will reach or exceed acceptable levels for public health within the time frame needed to design, fund and build a	Evaluate alternatives to septic systems such as a public sewer system, a community septic system

	project that will correct the problem, based upon projected growth rates.	maintenance program, or a collection and disposal system to existing on-site treatment tanks.
I	Failures occur in 5% of systems in an area or other number sufficient for the Health Department to identify a potential public health problem.	Consult with County Health and RWQCB on actions and monitor.

2. Includes septic tank systems or small aerobic systems with subsurface disposal. Typical disposal systems include leach fields, seepage pits, or evapotranspiration mounds.

Septic Tank Systems: Resource Capacity Study:

The resource capacity study should include the following:

- Inventory the extent of existing septic tank leaching field failures and their potential water quality impacts on surface and groundwater;
- Identify the locations where ~~additional~~ septic tanks may can be approved (~~if any~~) and standards for such approval;
- Evaluate whether there is a ~~the~~ need for alternative methods of sewage wastewater disposal, including community or package sewer treatment systems.

In areas with septic systems, identifying specific severity levels ~~becomes more can be~~ difficult. ~~The Regional Water Quality Control Board (RWQCB) has primary responsibility for protecting groundwater resources and surface water bodies from wastewater pollution. The control board's "Water Quality Control Plan" notes that septic systems are sometimes seen as an interim sewage disposal in urbanizing areas, but must often function for years before a community sewer system becomes available. The County Health Department works closely with the RWQCB in determining where potential septic problem areas may exist (i.e., increased septic system density, poor soils, high groundwater).~~ The County Health Department and RWQCB use the following criteria to identify septic system failures:

- Evidence of sewage wastewater, or waters of sewage wastewater origin, on the ground surface;
- Plumbing fixtures that drain improperly because of a problem in individual subsurface disposal systems;
- Frequent pumping of subsurface sewage wastewater systems for reasons other than normally scheduled maintenance;
- Persistent odors traceable to any individual subsurface sewage wastewater system(s);
- Pollution of wells or underlying groundwater that is directly attributable to septic systems;
- Restricted use of plumbing fixtures to prevent occurrence of ~~criteria one through five the~~ above criteria.

~~Because of the difficulty of identifying causes for system failures, an area pattern must become apparent before a threat to public health is assumed. The RWQCB has suggested that reasonable failure thresholds for defining the alert levels would occur in 10% increments, beginning at 5% of the systems in a given area.~~

In areas where soil percolation characteristics particularly favor the use of septic disposal fields, other ~~problems issues can could~~ arise, including degradation of groundwater by nitrate buildup. That condition is of particular concern where septic systems are used over a shallow groundwater basin serving as a community water supply. ~~In rapidly developing areas where adequate data are unavailable, the~~ The RWQCB Basin Plan recommends that monitoring of surface and groundwater should be initiated in developing areas where water quality data is unavailable to determine whether such problems are developing. ~~Such a program would constitute a Level II OS I resource capacity study.~~

ROADS/CIRCULATION, HIGHWAY INTERCHANGES

Policy Issues

Traffic congestion occurs in many communities of the County because levels of development exceed the capacity of existing transportation facilities. As growth continues, the County will need to accommodate increased traffic by funding road and freeway interchange improvements and by developing alternative programs to minimize impacts to these facilities.

Roads and freeway interchange improvements are completed through various funding mechanisms, including

1. Requirements of land use permits and land divisions
2. Traffic impact fee programs
3. State or Federal funds
4. County or property owner-initiated assessment districts
5. Countywide sales tax increase
6. Countywide motor vehicle fuel tax



The County General Plan Circulation Element includes several goals and objectives to address the timing and funding of circulation improvements, including:

- Planning transportation improvements consistent with the land use patterns allowed in the County [Land Use Element](#);LUE;
- Integrate land use and transportation planning so that necessary transportation facilities and services can be provided to accommodate urban and rural development; and
- Encourage policies for new development to finance adequate additional circulation and access as a result of the increased traffic it will cause.

Roads, Circulation, Highway Interchanges: Level of Severity Criteria and Recommended Actions

Table J

Roads, Circulation, Highway Interchanges: Level of Severity Criteria and Recommended Actions

Level of Severity	Roads, Circulation Criteria	Recommended Actions
I	Traffic volume projections indicate that Level of Service "D" would be reached within five years.	<ol style="list-style-type: none"> 1. Establish traffic impact fees 2. Complete initial project descriptions for needed road and circulation improvements. 3. Initiate a study of costs and funding for needed road and circulation improvements and alternatives.
II	Traffic volume projections indicate that Level of Service "D"	Seek state and federal funding as

	would be reached within two years.	applicable.
III	Traffic volume projections indicate that the road or facility is operating at Level of Service "D."	Secure funds to make needed road and circulation improvements.
Highway Interchange Criteria		
I	Traffic volume projections indicate that Level of Service "D" would be reached within 10 years.	<ol style="list-style-type: none"> 1. Establish traffic impact fees as applicable 2. Complete initial project descriptions for needed interchange improvements. 3. Initiate a study of costs and funding for needed road and circulation improvements and alternatives.
II	Traffic volume projections indicate that Level of Service "D" would be reached within five years.	Seek state and federal funding as applicable.
III	Traffic volume projections indicate that the interchange is operating at Level of Service "D."	Secure funds to make needed interchange improvements.

Roads, Circulation, Highway Interchanges: Resource Capacity Study:

The Public Works Department prepares a resource capacity study that:

- Evaluates roadway capacity against the County General Plan's development capacity and any proposed and recently approved major projects,
- Identifies alternative improvements and their costs at different allowable densities and uses, in cooperation with the [Planning and Building Department](#)[Planning Department](#); and
- Recommends feasible improvements and/or revisions to the General Plan.

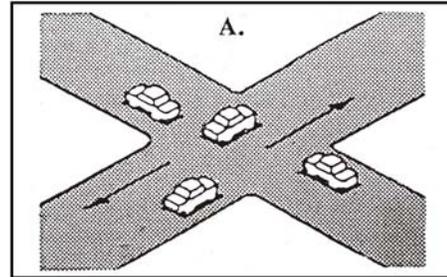
Identifying the traffic capacity of roads requires use of several traffic engineering standards. Roads are evaluated for their "level of service" characteristics to assess the ability of a given road segment to satisfy projected travel demand. The Highway Capacity Manual establishes service levels A through F based on such factors as safety, freedom to maneuver, travel time and driver comfort. Table K shows the level of service for various road types. When a road has reached "capacity," it is considered to be at a Level of Service E. That volume represents the maximum number of vehicles per hour that the road can safely accommodate.

The Planning and Public Works Departments operate a monitoring and reporting system in order to anticipate potential problems. The levels of service are calculated for selected roads and freeway interchanges in the county on an annual basis. This information is supplied to the [Planning and Building Department](#)[Planning Department](#) in order to determine the level of severity. (Amended 2011, Ord. 3220)

Table K
Streets and Highways Levels of Service Concept

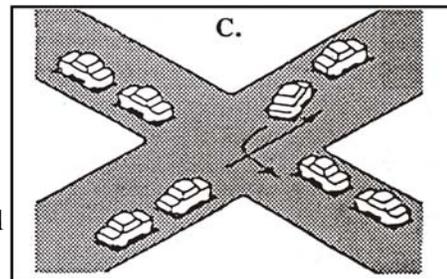
Level of Service A

- 1 Free flow conditions
- 2 Individual users are virtually unaffected by the presence of others in the traffic stream



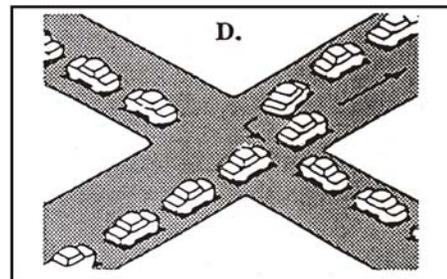
Level of Service B

- 1 Stable traffic flow
- 2 Freedom to select desired speeds is relatively unaffected, but there is a slight decline in the freedom to maneuver



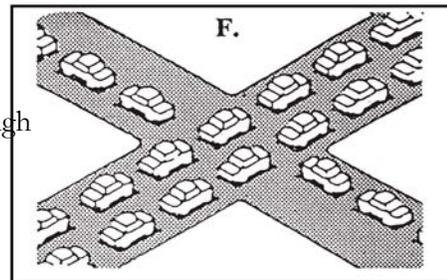
Level of Service C

- 1 Stable and acceptable flow but speed and maneuverability somewhat restricted due to higher volumes
- 2 Operation of individual users becomes significantly affected by the presence of others



Level of Service D

- 1 High density but stable flow
- 2 Driver experiences a generally poor level of comfort and convenience
- 3 Small increases in traffic flow will cause operational problems
- 4 Maneuverability restricted



Level of Service E

- 1 Speeds reduced to low, but relatively uniform value
- 2 Freedom to maneuver is extremely difficult, frustration is high
- 3 Volume at or near capacity
- 4 Unstable flow

Level of Service F

- 1 Forced or breakdown flow conditions
- 2 Stoppage for long periods due to congestion
- 3 Volumes drop to zero in extreme cases

SCHOOLS

Policy Issues

Some school districts have seen substantial growth in past years and have experienced overcrowding. County policies on future development in these school districts are important because new development which occurs faster than school facilities develop can aggravate existing overcrowding or create overcrowding where it had not been previously experienced. State legislation provides money for new school construction; however, school districts are required to match that funding. In order to accomplish this, the legislation permits school districts to collect fees from developers. As of 2013, districts may levy fees of no more than \$3.20 per square foot for residences and \$1.00 per square foot for commercial projects. The fees collected are matched with state funds. This legislation enables school districts to help fund much needed permanent facilities.



Schools: Level of Severity Criteria

| [Level HHLOS III](#): enrollment equals or exceeds the maximum student/classroom ratio.

| [Level HLOS II](#): enrollment projections indicate that school capacity will be reached within five years or other shorter time increment identified by a school district projection. It is estimated that five years are needed to plan, finance and construct new school facilities, though that lead time could be extended by using mobile classrooms.

| [Level HLOS I](#): enrollment projections reach school capacity in seven years. Seven years is the maximum period over which school districts can project enrollment with reasonable accuracy.

The capacity of a school is the maximum number of students that can be accommodated without exceeding school district standards for the maximum number of students per classroom. Those standards are based upon educational quality and efficient use levels for facilities and personnel.

When determining school capacity, adopted school district standards should be accepted by the County. Most school districts prepare their own population estimates for making enrollment projections. If available, district population projections should be used to determine threshold levels, instead of population projections the [Planning and Building Department](#) has prepared.

AIR QUALITY

Policy Issues

The air quality of the county is not as tangible or easily understood as some of our other resources.

Nonetheless, clean air is a valuable and essential natural resource which affects many aspects of our daily lives. It is vital to our health and welfare, to tourism and the local agricultural economy, and to the aesthetic beauty and quality of life enjoyed by county residents.

The capacity of the air to absorb environmental contaminants is



limited, however, and must be managed wisely to avoid significant deterioration of the resource.

(Moved to new section on Relationship to County General Plan)

The Air Pollution Control District (APCD) has the primary responsibility of protecting and managing air quality within the county. This responsibility involves regulatory and planning efforts to assure that air quality within the county meets the requirements of state and national air quality standards and is consistent with the County Clean Air Plan (CAP). According to the California Air Resources Board (CARB), state standards for ozone and fine particulate matter (PM₁₀) are currently exceeded in San Luis Obispo County. As a result, CARB has designated the county a nonattainment area for these pollutants.

State law delegates regulatory authority to the APCD over all non-vehicular sources of air pollution within the District. New and modified stationary sources must comply with the District's source review rule. This generally requires stringent emission controls and a demonstration that project emissions will not cause a violation, or interfere with the attainment and maintenance, of any California or national ambient air quality standard. The primary pollutants regulated by these standards are ozone, carbon monoxide, nitrogen dioxide, sulfur dioxide and particulate matter. With the exception of ozone, ambient concentrations of these pollutants are primarily influenced by nearby sources of emissions. High concentrations of sulfur dioxide, for example, can usually be traced back to a specific source, where regulatory measures or other actions can be implemented to correct an identified problem. Ozone, on the other hand, tends to be regional in nature and is therefore more difficult to control.

Ozone is the pollutant of greatest concern in the county. Ozone is not emitted directly to the air, but is formed by an atmospheric chemical reaction between reactive organic gases (ROG) and nitrogen oxides (NO_x) in the presence of sunlight. These compounds are generally emitted through the combustion of fossil fuels. Motor vehicles represent the largest category of combustion sources and generate over 50% of the ROG and NO_x emissions in the county. Land use decisions which result in increased vehicle use will contribute to regional ozone formation. Thus, a number of critical determinants of air quality are related to such issues as population distribution, vehicle miles traveled and locations of available housing and jobs. These determinants are largely the result of land use decisions made by cities and the County. Careful and informed planning is needed to ensure that the air quality resource is adequately protected.

Another important pollutant in our air is particulate matter that is comprised of various small particles, including acids, organic chemicals, metals and dust. Of primary concern are particles that are 10 micrometers in diameter or smaller (PM₁₀) and particles that are 2.5 micrometers in diameter or smaller PM (2.5). Particles within those ranges can enter the lungs and cause health problems.

The current CAP was adopted by the APCD in 2001. The Plan contains the strategies that will be employed for the county to reach attainment of air quality goals. The CAP strategies include application of best available control technology and transportation measures to reduce the rate of growth of vehicles miles traveled. Other strategies are to prepare annual progress reports for submittal to ARB, with a comprehensive plan update every three years until attainment is reached. Generally, the CAP will be revised if progress toward the plan goals is not realized as forecasted.

Air Quality: Relationship to the County General Plan

The County of San Luis Obispo has the authority under the police power to protect the health, safety, and welfare of citizens from such environmental hazards as air pollution. The County General Plan acknowledges the relationship between the APCD air quality goals and policies and the County General Plan policies. For example, the Conservation and Open Space Element of the County General Plan states that the County should amend the General Plan to avoid General Plan Amendments and land use designation changes that are not consistent with the APCD’s approved plans (i.e., Toxic Risk Management Plan, PM Report, Clean Air Plan, and CEQA Handbook). *(Existing language moved from following section)* In addition, general plan amendments should encourage land use patterns that enable efficient development focused in urban areas that reduces vehicle miles traveled and air pollution.

Air Quality: Reporting

The APCD continuously monitors and reports on air quality in the county and plays a primary role in enabling the county to attain air quality goals. *(Moved this language to preceding section)* The APCD’s triennial progress reports to the CARB are used in the RMS to evaluate progress toward air quality goals. The progress reports fulfill the purpose of reporting on levels of severity; therefore, no separate levels of severity are defined in the RMS for air quality. The RMS Biennial Report should include the latest air quality updates from the APCD triennial reports.

PARKS

Policy Issues

Parks are an important part of our communities. The County General Plan’s Parks and Recreation Element (PRE), adopted 2006, states that:

“Recreation and exercise are fundamental to a healthy life. The benefits include greater productivity, less disease, and a brighter future. As the population grows, competition for recreational resources increases. Wide open spaces, once the haven of the equestrian, hiker and poet, are more often fenced and the right of exclusivity enforced. As the development and formality of our area increases, so must the provision of recreation spaces that are available to all people.”



in

With County acknowledgement of the importance of parks in our lives, the RMS is a good tool to assess our success in providing this important community need.

The PRE describes not only the difficulties of funding new parklands and park development, but also the challenge of funding their ongoing operations and maintenance. Policy 6.4 addresses the importance of ongoing funding of parks:

“Prior to accepting or developing a new park, County Parks shall determine the long-term maintenance and operating costs associated with the proposed project. The County shall not develop the park until adequate funds are available for maintenance.”

The PRE includes several park classifications, which include mini-parks, linear parks, neighborhood and community parks, regional parks, and recreation settings. The criteria for levels of severity for parks consist of both nationally recognized park acreage standards and the ability to fund park maintenance activities. The criteria also recognize the need to provide proper distribution of the various park classifications throughout each community and the availability of recreational facilities within parks.

**Table L
Parks: Level of Severity Criteria and Recommended Actions**

Level of Severity	Parks Criteria	Recommended Actions
I	<p>An unincorporated community has between 2.0 and 3.0 acres of parkland per 1,000 population, OR</p> <p>Parkland or recreation facilities are somewhat inconsistent with the Parks and Recreation Element. This may include the following considerations: i) substantial concentration of parkland in too few areas of a community, leaving other areas with insufficient parkland, ii) insufficient parkland within a particular park classification, or iii) an insufficient amount of park recreation facilities (i.e. sports fields, courts) for a community, OR</p> <p>Deferred maintenance on a park has accrued to greater than 2 years of maintenance activities.</p>	<ol style="list-style-type: none"> 1. Collaborate with County Parks (General Services Agency) to review the Parks and Recreation Project List in the Parks and Recreation Element and make recommendations to the Board of Supervisors regarding which park projects to implement. 2. Collaborate with other potential parks operators such as CSDs and school districts to provide park and recreation opportunities.

<p style="text-align: center;">II</p>	<p>An unincorporated community has 1.0 to 2.0 acres of parkland per 1,000 population, OR</p> <p>Parkland or recreation facilities are substantially inconsistent with the Parks and Recreation Element. This may include the considerations described in the criteria for Level of Severity I, OR</p> <p>Deferred maintenance on a park has accrued to greater than 5 years of maintenance activities.</p>	<ol style="list-style-type: none"> 1. Recommend to the Board of Supervisors that maintenance should be increased at certain park facilities. 2. Collaborate with County Parks (General Services Agency) to review the Parks and Recreation Project List in the Parks and Recreation Element and make recommendations to the Board of Supervisors regarding which park projects to implement. 3. Collaborate with other potential parks operators such as CSDs and school districts to provide park and recreation opportunities.
<p style="text-align: center;">III</p>	<p>An unincorporated community has 1.0 acre or less of parkland per 1,000 population, OR</p> <p>Parkland or recreation facilities are mostly inconsistent with the Parks and Recreation Element. This may include the considerations described in the criteria for Level of Severity I, OR</p> <p>Deferred maintenance on a park has accrued to greater than 8 years of maintenance activities.</p>	<ol style="list-style-type: none"> 1. Recommend to the Board of Supervisors that maintenance should be increased at certain park facilities. 2. Collaborate with County Parks (General Services Agency) to review the Parks and Recreation Project List in the Parks and Recreation Element and make recommendations to the Board of Supervisors regarding which park projects to implement. 3. Collaborate with other potential parks operators such as CSDs and school districts to provide park and recreation opportunities.

1. Levels of severity are recommended by County Parks (General Services Agency) using the criteria in this table.

Parks: Resource Capacity Study

A resource capacity study is prepared by County Parks (General Services Agency). It should:

1. Inventory existing parkland in the affected unincorporated community.
2. Document existing shortfalls in park acreage.
3. Describe the distribution and classification levels of parkland throughout the community.
4. Determine maintenance shortfalls.