TO: BOARD OF DIRECTORS

FROM: BRUCE BUEL BSB

DATE: MARCH 7, 2008

AGENDA ITEM
E-4
MAR 12, 2008

COMMENT ON AFFORDABLE HOUSING REVISED DRAFT EIR

ITEM

Authorize submittal of comments to SLO County re Affordable Housing Revised Draft Environmental Impact Report (EIR) [RECOMMEND ADOPTION].

BACKGROUND

SLO County released the attached Affordable Housing Ordinances Revised Draft EIR on February 1, 2008 and set March 24, 2008 as the deadline for receipt of comments.

Staff believes that the Revised Draft needs significant further revision to satisfy CEQA including the addition of the following information:

1. A description of the Level of Severity III for NMWCA for water supply certified by the Board of Supervisors.
2. A description of the Limitations imposed by SLO County Ordinance 3090;
3. An assessment of the increased water demand and sewer flow resulting from implementation of each of the ordinances
4. An assessment of the water supply alternatives available to satisfy that increased demand;
5. An assessment of the feasibility of mitigations to reduce impacts to levels of less than significant;
6. Specific proposals to revise the draft ordinances to ensure that increased densities will not occur in planning areas with Levels of Severity II or III until adequate water is available to reduce those Levels of Severity below level II.

RECOMMENDATION

Staff recommends that your Honorable Board review the concepts set forth above; add additional concepts and authorize staff to submit a comment letter regarding all agreed upon comments.

ATTACHMENTS

- Affordable Housing Ordinances Revised Draft EIR

T:\BOARD MATTERS\BOARD MEETINGS\BOARD LETTER\BOARD LETTER 2008\Affordable Housing RDEIR.DOC

San Luis Obispo County

Department of Planning and Building
Environmental Division

TO: **Responsible and Trustee Agencies and Other Interested Parties**

DATE: **February 1, 2008**

FROM: **Jeff Oliveira, Environmental Resource Specialist**

SUBJECT: **County of San Luis Obispo Affordable Housing Ordinances -- Notice of Availability of Revised Draft EIR (ED06-253, LRP2005-00010)**

The Revised Draft Environmental Impact Report (RDEIR) for the County of San Luis Obispo Affordable Housing Ordinances is complete and available for review. The RDEIR provides for a revised analysis for the issue of Water Resources and the associated environmental impacts that may be associated with the request to implement the proposed Affordable Housing Ordinances for San Luis Obispo County.

The geographic boundary of the proposed Affordable Housing Ordinances would be defined as the entire unincorporated portion of San Luis Obispo County. However, the RDEIR is focused on the updated water availability and use data as it relates to those Water Planning Areas (WPAs) that currently operate at a Level of Service (LOS) III and would experience significant increase in population as a result of the proposed Affordable Housing Ordinances.

ENVIRONMENTAL IMPACTS:

The original Draft EIR was prepared to address the environmental impacts of the proposed project, including, but not limited to, biological resources, cultural resources, agriculture and air quality. In addition, the original Draft EIR also considered four alternatives in addition to the "No Project" alternative. The RDEIR was prepared to specifically address the updated water availability data for areas identified as being at a Level of Severity III for water resources and would experience significant population increases under the proposed ordinance package and responds to the principles described in *Vineyard Citizens for Responsible Growth, Inc. v. City of Rancho Cordova (2007).*

CEQA Guidelines Section 15087(c)(6) requires this notice to specify whether the project will involve activities on any state or federal listed hazardous materials sites, such as the locations of underground storage tanks, gas stations, and other chemical storage facilities. To the extent that the project boundary is defined as the entire unincorporated county, the project boundary may include listed hazardous materials sites. The original Draft EIR addresses this issue.

HOW TO GET MORE INFORMATION:
Copies of the RDEIR are available at the County Department of Planning and Building, Room 200 (2nd Floor), in the County Government Center (Old Courthouse) at the corner of Osos and Palm, and the City/County Library on Palm Street in San Luis Obispo. Documents referenced in the report are generally available at County Planning; certain copyright-protected and out of print materials may be obtained from the consultant's offices through a request to the County. Documents are also available online at:
http://www.slocounty.ca.gov/planning/environmental/envnot/Environmental_Impact_Reports_2007.htm

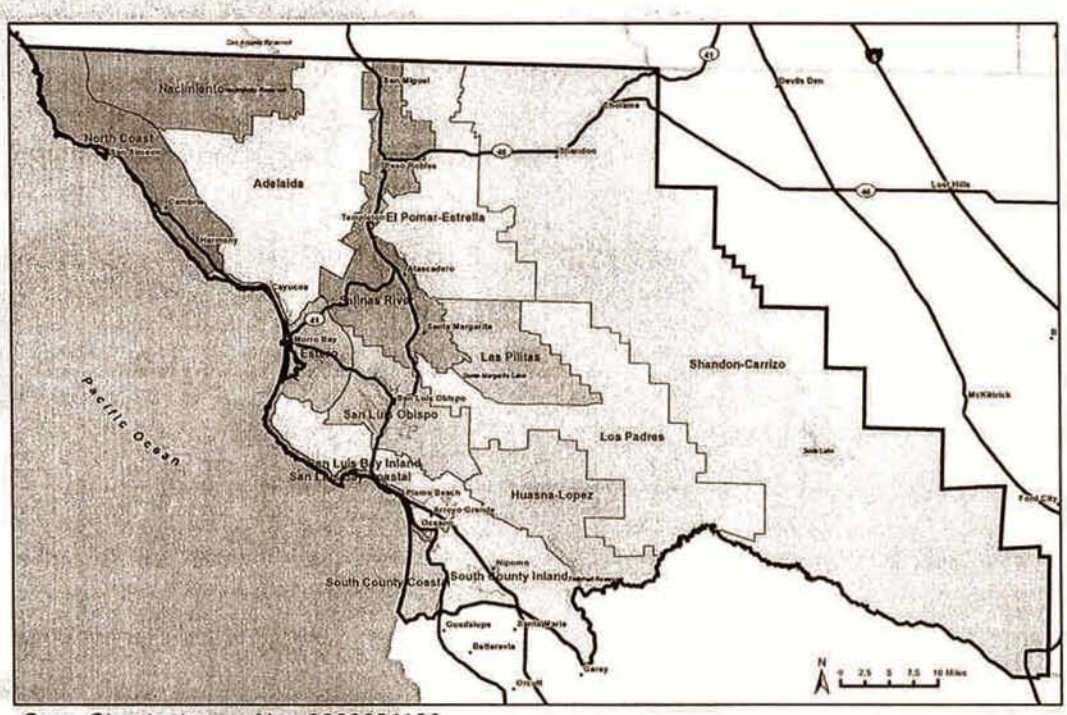
Any questions regarding the Revised Draft EIR should be sent to Jeff Oliveira, Environmental Resource Specialist, 805-781-4167, joliveira@co.slo.ca.us

For additional information or questions regarding the Affordable Housing Ordinance, please contact Dana Lilley at 805.781.4571.

PUBLIC HEARING:
The first public hearing before the San Luis Obispo County Planning Commission to certify the EIR, including the Revised Draft EIR, and consider the project for approval has been tentatively scheduled for April 24, 2008 in the Board of Supervisors Chambers, County Government Center, San Luis Obispo. If you plan to attend, please call two weeks before this date to verify.

Revised Draft

Affordable Housing Ordinances Environmental Impact Report



State Clearinghouse No. 2006021100

Prepared for:
County of San Luis Obispo

Prepared by:
Rincon Consultants, Inc.

January 2008

Environmental Scientists Planners Engineers

Revised Draft

Affordable Housing Ordinances Environmental Impact Report

State Clearinghouse No. 2006021100

Prepared for:
County of San Luis Obispo
Department of Planning and Building
San Luis Obispo, California 93401

Contact:
Jeff Oliveira, Environmental Resource Specialist
(805)781-4167

Prepared by:
Rincon Consultants, Inc.
1530 Monterey Street, Suite D
San Luis Obispo, California 93401

January 2008

rincon

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TABLES AND FIGURES:

OTHER AVAILABLE DOCUMENTS:

Original June 2007 Final EIR and all appendices to the Final EIR are available at the San Luis Obispo County Department of Planning and Building, at the address shown on the title page of this document.

INTRODUCTION to the REVISED DRAFT EIR

This document presents a revised analysis of the issue of Water Resources for the Affordable Housing Ordinances EIR. The purpose of this revision is to address concerns raised by the Nipomo Community Services District (NCSD) subsequent to the public comment period for the Draft EIR, which began on March 2, 2007 and concluded on April 30 2007. In a letter dated August 22, 2007, and at public hearings to consider certification of the Final EIR, the NCSD expressed concerns about the analysis of water resources as it related to the Nipomo community, particularly with regard to WPA-6, the water planning area that includes Nipomo, and in the service area of the NCSD. The analysis is revised to address that agency's specific concerns, and more generally concerns related to possible future development in areas identified as being within a Level of Severity III for water resources, as defined by San Luis Obispo County.

LEGAL AUTHORITY

This document has been prepared in accordance with the California Environmental Quality Act (CEQA), and the *State CEQA Guidelines*. It is intended to serve as an information document for the public and to guide County decisionmakers.

Procedurally, this document, along with the currently proposed Final EIR (June 2007), constitute a Revised Draft EIR. Since the June 2007 Final EIR has not yet been certified, the conditions for the preparation of a Supplement or Subsequent EIR (pursuant to *State CEQA Guidelines* Section 15162 and 15163) do not apply. Instead, the preparation of this document is guided by *State CEQA Guidelines* Section 15088.5, which addresses the recirculation of an EIR prior to certification. The document is being recirculated to address significant new information as defined in the following provisions of Section 15088.5(a) of the *Guidelines*:

> *"A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. As used in this section, the term "information" can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement. "Significant new information" requiring recirculation includes, for example, a disclosure showing that:*
>
> > *(1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.*
> > *(2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.*

The new information in the revised analysis relates both to more refined water data than was originally made available, and the severity of potential impacts with respect to water resources that could result from the project's implementation.

With regard to specific requirements about recirculation and public review, *State CEQA Guidelines* Sections 15088(c) and (d) state the following:

> *"If the revision is limited to a few chapters or portions of the EIR, the lead agency need only recirculate the chapters or portions that have been modified. Recirculation of an EIR requires notice pursuant to Section 15087, and consultation pursuant to Section 15086."*

The County requests that commentors to this document limit their comments to issues related to the revised analysis. Responses to comments will also focus on this revised analysis. As noted in *State CEQA Guidelines* Section 15088.5(f)(2):

> *"When the EIR is revised only in part and the lead agency is recirculating only the revised chapters or portions of the EIR, the lead agency may request that reviewers limit their comments to the revised chapters or portions of the recirculated EIR. The lead agency need only respond to comments received during the recirculation period that relate to the chapters or portions of the earlier EIR that were revised and recirculated. The lead agency's request that reviewers limit the scope of their comments shall be included either within the text of the revised EIR or by an attachment to the revised EIR."*

The revised portion of the existing EIR, specifically the section addressing Water Resources, will be circulated for public review for 45 days, in accordance with CEQA requirements. The June 2007 Final EIR will also be available at the San Luis Obispo County Planning and Building Department for review, although apart from the water analysis, no other aspect of that document has changed since its original preparation. A Revised Final EIR will be prepared that includes the original June 2007 Final EIR, modified by the revised water analysis, with responses to public and agency comments that arise through the public review period for this revised document. The Revised Final EIR will also include any changes to the Revised Draft EIR that may arise from these comments. The process will culminate with the Planning Commission and Board of Supervisors hearings to consider certification of the Revised Final EIR, and a decision whether or not to approve the proposed project.

SUMMARY OF REVISED ANALYSIS

As noted above, the revised analysis focuses on the issue of water resources. The key changes to the original analysis include the following:

- Updated water availability and use data, particularly as it relates to WPA-6 (the Nipomo area), which is identified as being at a Level of Severity III for water resources. The analysis is also updated for other Level of Severity III areas that could see substantial development under the proposed project, including WPA-1 (North Coast) and WPA-3 (Los Osos/Morro Bay). The updated analysis responds to the principles described in *Vineyard Citizens for Responsible Growth, Inc. v. City of Rancho Cordova (2007).*
- Change in the level of severity of impact for water resources, from a Class II (significant but mitigable) impact, to a Class I (significant and unavoidable) impact. This conclusion relates specifically to areas identified as being within a Level of Severity (LOS) III for water resources.

INCORPORATION BY REFERENCE

Pursuant to CEQA § 15150, several documents are incorporated in their entirety by reference, and their conclusions, unless otherwise specified in this Revised DEIR, still apply. The environmental documents incorporated by reference are summarized below:

- Final Environmental Impact Report for the State Water Project Coastal Branch, Phase II and Mission Hills Extension, SCH# 1990010613. This document addressed the proposed construction of new State Water Project (SWP) facilities that would transport SWP water to San Luis Obispo and Santa Barbara Counties. The facilities analyzed in the program-level analysis included the Coastal Branch, Phase II and the Mission Hills Extension. The Coastal Branch, Phase II runs along the southern edge of the community of Santa Margarita.

- Final Environmental Impact Report for the State Water Project Coastal Branch (Phase II) Local Distribution Lines and Facilities, SCH# 1992100959. This document evaluates the site-specific impacts of the construction and operation of local distribution water pipelines, a water treatment plant, and supporting facilities that are associated with the State Water Project Coastal Branch, Phase II. This document tiers from the Final Environmental Impact Report for the State Water Project Coastal Branch, Phase II and Mission Hills Extension (discussed above). Nine local water distribution pipelines are analyzed in this document, including the North County Pipeline, which extends for approximately 17 miles from the Coastal Branch pipeline at SR 58 just east of the town of Santa Margarita to Paso Robles.

- Supplement to the SWP Coastal Branch Phase II and Mission Hills Extension Final EIR (State of California Division of Planning, October 1994) addressed technical design changes and realignment of Reach 5 of the project, which includes the Nipomo area.

The above documents are available for review at the County of San Luis Obispo Department of Planning and Building Environmental Coordinators Office, 976 Osos Street, San Luis Obispo, CA 93408.

4.10 WATER RESOURCES

This section analyzes the potential water resource impacts associated with the proposed Affordable Housing Ordinances. The purpose of the analysis is to evaluate existing water supplies, based primarily on County Water Planning Areas (WPA), comparing these to anticipated water demand generated by future development accommodated under the proposed ordinances. The analysis is updated from the June 2007 Final EIR to address areas identified as being at Level of Severity III for water resources that could experience substantial development under the proposed project, including WPA-6 (Nipomo), WPA-3 (North Coast) and WPA-1 (Los Osos/Morro Bay). The updated analysis responds to the principles described in *Vineyard Citizens for Responsible Growth, Inc. v. City of Rancho Cordova (2007).*

4.10.1 Setting

a. Water Delivery Systems. County-operated water delivery systems encompass two key components: infrastructure, which consists of individual service lines and mains, pumps, lift stations, and storage facilities such as tanks and reservoirs; and the energy required to move large amounts of water over the many miles of pipelines that service the County. Water service utilities in unincorporated areas of the County are provided by county service areas (CSA), community service districts (CSD), or private water companies.

A county service area (CSA) is a special taxing area which bears a special assessment or service charge for particular types of extended services, including (but not limited to) water service. CSAs are managed by the Board of Supervisors. Under the Board's direction, CSAs may levy taxes, establish zones of benefit, incur bonded indebtedness and enter into contracts. There are seven CSAs in San Luis Obispo County. A community service district (CSD) is a local governing body authorized to provide a variety of public services, with the exception of land use planning. A CSD typically has an elected governing body with full financial and operational responsibilities. There are thirteen CSDs in San Luis Obispo County.

Water distribution infrastructure is divided into a complex network of connected and independent facilities dispersed amongst the County's twelve different Water Planning Areas (WPA). WPAs represent the geographic organization of the County. Water demand, agricultural water needs, sources of supply, and other information are organized by WPA. Prior to the 2001 Water Master Plan Update, countywide water management plans have been organized by County Planning Area, a designation which does not coincide with watershed or groundwater basin boundaries. The following WPAs are intended foremost to recognize important hydrogeologic units throughout the County (refer to Figure 4.10-1 for WPA locations). The following discussion is based on the most recent County published data available.

WPA 1 - North Coast. Water Planning Area 1 (WPA 1) is situated in the northwest corner of the County and includes the communities of San Simeon and Cambria. The northern boundary of WPA 1 is the San Luis Obispo/Monterey County line. The Santa Lucia Range provides the WPA boundary along the northeast side, while the watershed divide between Villa Creek (WPA 1) and Cayucos Creek (WPA 2) forms the boundary to the south. Other creeks within this WPA include: San Carpoforo, Arroyo Hondo, Arroyo de los Chinos, Arroyo de la Cruz, Burnett, Oak Knoll, Arroyo Laguna, Little Pico, North Fork Pico, South Fork Pico,

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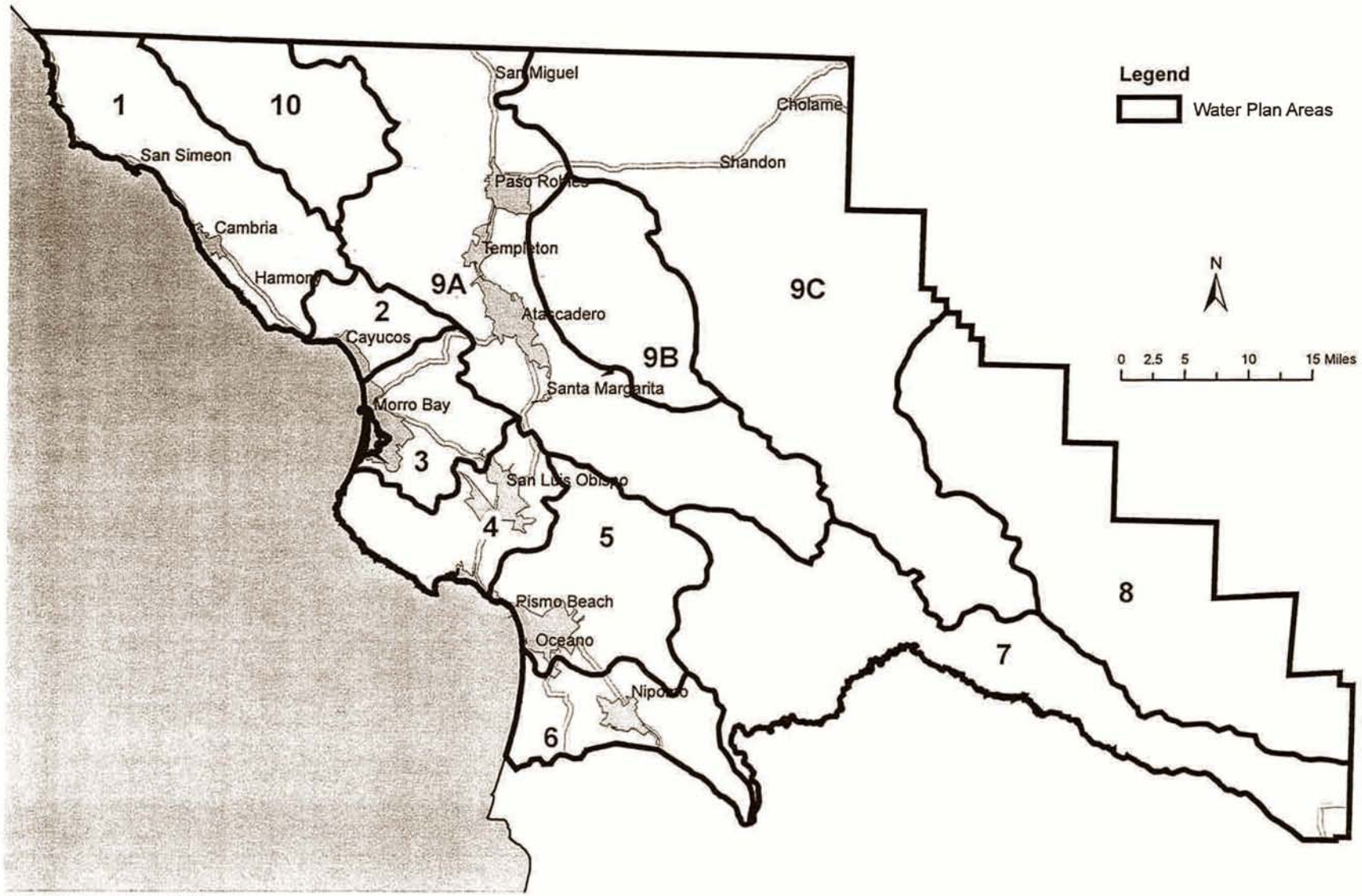

Source: County of San Luis Obispo

Water Planning Areas

Figure 4.10-1

County of San Luis Obispo

San Simeon, Steiner, Santa Rosa, and Perry. Water purveyors include Cambria CSD, San Simeon Acres CSD, and the 7X Youth Ranch.

WPA 2 - Cayucos. Water Planning Area 2 (WPA 2) includes coastal watersheds from Cayucos Creek to Toro Creek. The unincorporated community of Cayucos has three water purveyors, which provide services to the local urban area: Morro Rock Mutual Water Company, Paso Robles Beach Water Company, and County Service Area #10 [together, the Cayucos Area Water Organization (CAWO)].

WPA 3 - Los Osos/Morro Bay. Water Planning Area 3 (WPA 3) encompasses Morro Bay and those portions of the community of Los Osos that are within the Chorro Creek watershed. WPA 3 extends along State Route 1 (Cuesta College, Camp San Luis Obispo, Dairy Creek Golf Course, and the California Men's Colony). Three water purveyors serve the Los Osos area: County Service Area #9, Southern California Water Company and S&T Mutual Water Company.

WPA 4 - San Luis Obispo/Avila. Water Planning Area 4 (WPA 4) includes San Luis Obispo Creek watershed as well as the area from Avila Beach to Montana De Oro State Park. WPA 4 extends into Edna Valley up to the Pismo Creek watershed divide. Purveyors include the City of San Luis Obispo and Avila Beach CSD.

WPA 5 - Five Cities. Water Planning Area 5 (WPA 5) includes the Five Cities area from Pismo Creek to Arroyo Grande Creek watersheds. WPA 5 also encompasses Lopez Lake watershed. Purveyors include: the City of Arroyo Grande; the City of Grover Beach; the City of Pismo Beach; Oceano CSD; and the Southern California Water Company. Private purveyors include the following:

- *Ball Tagawa Growers*
- *Biddle Regional County Park*
- *Blue Sky Water Assn.*
- *Branch Elementary School*
- *Deer Valley*
- *Fowler Mobile Home Estates*
- *Grande Mobile Home Manor*
- *Lopez Recreational Area*
- *Mesa Dunes MH Estates*
- *Mutual Water Assn*
- *Newsom Spring MWC*
- *Nunes Water Supply*
- *Oak Park Manor*
- *Sweet Springs Mobile Park*
- *Talley Farms Labor Housing*
- *Terra De Oro Water Co.*
- *Varian Ranch MWC*
- *Vista De Las Flores Wtr Co*
- *Woodland Park*
- *Circle II (Tract 1323)*

WPA 6 - Nipomo Mesa. Water Planning Area 6 (WPA 6) includes that portion of San Luis Obispo County that lies within the Santa Maria River watershed. Purveyors include the Nipomo CSD and the Southern California Water Company. Private water purveyors include the following:

- *Arroyo Grande Mushroom Farm*
- *Black Lake Canyon Water Supply*
- *Callender Water Assn*
- *Country Hills Estates*
- *Greenheart Farms*
- *Heritage Lane MWC*
- *Hetrick Water Co.*
- *Ken Mar Gardens*

- *La Mesa Water Co*
- *Rancho Nipomo Water Co.*
- *Guadalupe Cooling*
- *Clearwater Nursery*
- *Cuyama Lane Water Co*
- *Dana Elementary School*
- *La Colonia Water Assn*
- *Laguna Negra (Tract 610)*
- *Mesa Mutual Water Co*
- *Rim Rock Water Co*
- *Santa Maria Speedway*
- *Speeding, Inc.*
- *True Water Supply*

WPA 7 - Cuyama. Water Planning Area 7 (WPA 7) encompasses the portion of San Luis Obispo County that lies within the Cuyama River watershed (i.e. Twitchell Reservoir).

WPA 8 - California Valley. Water Planning Area 8 (WPA 8) consists of the Carrizo Plain area of the County. Purveyors include the California Valley CSD, the CDF-Simmler Fire Station, California Valley Water, and the Carrisa Plains Elementary School.

WPA 9A - Salinas. Water Planning Area 9A (WPA 9A) generally consists of the Salinas River watershed along the U.S. Highway 101 corridor from Santa Margarita Lake north to San Miguel. Purveyors include the city of Paso Robles and the following:

- *Templeton Community Service District*
- *Garden Farms County Water District*
- *County Waterworks District No. 1, San Miguel*
- *County Waterworks District No. 8, Santa Margarita*
- *Atascadero Mutual Water Company*
- *McNamara Water Supply*
- *Durand Water Co*
- *Adelaide Estates MWC*
- *Almira Water Assn*
- *Town Creek Water Supply*
- *McNamara Water Supply*
- *Via Condias Water Supply*
- *Atascadero Lake*
- *Babe Ruth Trailer Park*
- *Los Robles M.H. Estates*
- *Mustang Mobile Village*
- *Rancho Colina M.H. Park*
- *Resthaven M.H. Park*
- *Rinconada Trailer Park*
- *Santa Margarita Lake Campground*
- *Cal-Shasta Club, Inc.*
- *Christmas Cove Co.*
- *Hazard Water Supply*
- *Atascadero State Hosp. Water*
- *Bee Rock Store Water Supply*
- *Bow Valley Aquiland Wtr. Supply*
- *Camp Wantala Water Supply*
- *El Paso de Robles School*
- *Ritchie's Water Supply*
- *Moe Water Supply*
- *The Hillhouse Water Supply*
- *Pete Johnson Chevrolet*
- *Pleasant Valley Elementary School*
- *Port-a-Port West*
- *Pozo Saloon*
- *San Paseo Truck Stop*
- *Santa Lucia School*
- *Shan-Val Hills Vineyard*
- *Wine World Estates*
- *Mustang Springs MWC*

WPA 9B - Creston. Water Planning Area 9B (WPA 9B) encompasses the portion of the Paso Robles groundwater basin that also coincides with the Huerhuero Creek watershed. The northwestern boundary is generally the boundary between urban land uses of Paso Robles and the agricultural uses surrounding Creston. The southern boundary follows the watershed boundary of the Huerhuero Creek. Purveyors include the Black Mountain RV Resort.

WPA 9C - Shandon. Water Planning Area 9C (WPA 9C) encompasses the watershed bounded by the La Panza Range to the southwest and includes the Estrella Creek watershed to the north. Purveyors include County Service Area No. 16 and the following purveyors:

- *Green River MWC*
- *Phillips Elementary School*
- *Shandon Rest Stop*
- *Hearst Corp-Cholame Store*

WPA 10 - Nacimiento. Water Planning Area 10(WPA 10) consists of the portion of the County that drains into Lake Nacimiento. Purveyors include Heritage Ranch CSD and the Nacimiento Water Company.

Table 4.10-1 summarizes the existing water resource supply and projected demands for a 20-year planning horizon for each water planning area in the region. The information in the table was taken from the County's Water Master Plan, slocountywater.org (2007), and Water Supply in the Nipomo Mesa Area (November 2004).

b. Water Supply. The following discussion of County water supply has been adapted from the San Luis Obispo County Water Master Plan , as augmented by additional information on www.slocountywater.org (2007), and *Water Supply in the Nipomo Mesa Area* (SLO County, November 2004). County water supply is divided among three main sectors: groundwater, surface impoundments, and allotments of State water wielded through the State Water Project.

WPA 1 - North Coast (North Coast Planning Area). Groundwater basins in WPA 1 include the San Carpoforo, Arroyo de la Cruz, Pico, San Simeon, Santa Rosa, and Villa basins. Estimates of groundwater availability indicate an annual yield of approximately 5,664 acre-feet (AFY). In addition to groundwater supplies from several coastal basins, WPA 1 benefits from stream flows with an estimated 4,737 AFY in appropriated stream flows. Approximately one-third of the appropriated flows are along the San Carpoforo Creek, half from San Simeon Creek, and the remainder from Santa Rosa Creek. Cambria CSD and the Hearst Corporation hold significant water rights in WPA 1.

WPA 2 - Cayucos (Portions of Estero and Adelaina Planning Areas). Three separate purveyors supply domestic water to the community of Cayucos: Morro Rock Mutual Water Company, Paso Robles Beach Water Company, and County Service Area #10. These purveyors share a common source of supply (Whale Rock Reservoir) and operate a common water treatment plant. In addition, WPA 2 includes the San Geronimo, Cayucos, Old, and Toro Basins. These basins are used principally for local domestic and agricultural purposes. Old Basin is the small alluvial deposit downstream of Whale Rock Dam which is also used by Cayucos water purveyors. Estimates of groundwater availability indicate a yield of approximately 1,191 acre-feet with a surface water supply of 2,224 acre-feet (Water Master Plan; slocountywater.org, 2007). It should be noted that this estimate comes from data published in 1958.

WPA 3 - Los Osos/Morro Bay (Portions of Estero Planning Area). Three groundwater basins (Morro, Chorro, and Los Osos) provide water to municipal, agricultural, recreational,

Table 4.10-1 Existing Water Supply and Projected Demand

Water Planning Areas	County Planning Areas	Quantity of Water Resources (af-yr)[1]				Demand[2]	Balance [Deficiency]	Level of Severity (LOS)[3]
		Surface	Groundwater	Reclaimed	Imported			
WPA #1: North Coast	North Coast Planning Area	4,737	5,664	0	0	U = 2,770 A = 540 R = 790	6,300	SPL = III SYS = III
WPA #2: Cayucos	Estero Area Plan	2,224	1,191	0	0	U = 750 A = 850 R = 680	1,170	SPL = II SYS = II
WPA #3: Los Osos/ Morro Bay	Estero Area Plan	5,262	3,700	275	1,313	U = 6,930 A = 7,490 R = 780	[6,240]	SPL = III SYS = III
WPA #4: SLO/Avila	San Luis Bay – Coastal Area Plan, San Luis Obispo Inland Area Plan,	8,073	5,900	0	100	U = 14,490 A = 6,060 R = 1,100	[7,680]	none
WPA #5: Five Cities	San Luis Bay – Coastal Area Plan, San Luis Obispo Bay Inland Area Plan, Huasna – Lopez Inland Area plan	10,657	9,320	0	1990	U = 11,990 A = 16,230 R = 3,940	[12,160]	none
WPA #6: Nipomo Mesa	South County Coastal/Inland Area Plans	0	19,900	0	0	U = 3,900 A = 22,540 R = 3,080	[9,620]	groundwater basin SPL = III[4]
WPA #7: Cuyama	Los Padres Inland Area Plan	0	8,000	0	0	U = 0 A = 20,520 R = 490	[13,010]	Groundwater basin = III
WPA #8: California Valley	Shandon-Carrizo Area Plan	0	600	0	0	U = 0 A = 210 R = 1,090	[700]	none
WPA #9a: Salinas	Salinas River Area Plan Las Pilitas Area Plan,	3,693	48,000	0	0	U = 41,120 A = 31,820 R = 7,440	[28,690]	Garden farms SPL = II, San Miguel & Templeton SYS = II, Santa Margarita SYS = III
WPA #9b: Creston	El-Pomar/Estrella Planning Area	263		0	0	U = 0 A = 5,750 R = 6,230	36,280	none
WPA #9c: Shandon	Shandon/Carrizo Inland Planning Areas	138		0	0	U = 0 A = 27,190 R = 1,070	19,880	none
WPA #10: Nacimiento	Nacimiento, Adelaida Inland Planning Area	1,200	0	0	0	U = 0 A = 0 R = 3,020	[1,820]	none

Notes:
[1] Estimated urban water demands are based on General Plan buildout projections, which is beyond the 20 year time frame required by Integrated Regional Water Management guidelines.
[2] Estimate rounded to nearest 10 ac-ft
[3] San Luis Obispo 2006 Annual Resources Summary Report LOS Recommendation for water supply (SPL) and water system (SYS). Ratings are applies to County Planning Areas. LOS I = projected water demand over the next nine years equals or exceeds the estimated dependable supply, LOS II = projected water demand over the next seven years equals or exceeds the estimated dependable supply, LOS III = the existing water demand equals or exceeds the dependable supply
[4] Certified by the County of San Luis Obispo on June 26, 2007
Sources: *Water Master Plan*; slocountywater.org, 2007; *Water Supply in the Nipomo Mesa Area*, SLO County, November 2004.

institutional and local domestic users within WPA 3. While these three basins have been grouped together within this planning area, the three basins are very different in terms of their management issues, including seawater intrusion, high nitrate concentrations, and imported water recharge (Water Master Plan; slocountywater.org, 2007). Estimates of groundwater availability indicate an annual yield of approximately 3,700 AFY (Water Master Plan; slocountywater.org, 2007). Surface supplies to WPA 3 include water from Whale Rock Reservoir, seawater desalination, State Water supplies, and stream flow. Non-groundwater supply is estimated at approximately 5,262 AFY (Water Master Plan; slocountywater.org, 2007).

WPA 4 - San Luis Obispo/Avila (San Luis Obispo, San Luis Bay Coastal, and San Luis Bay Inland Planning Areas). The primary groundwater basin that provides water to WPA 4 is the San Luis Obispo Creek groundwater basin. Estimates of groundwater availability indicate an annual sustained yield of approximately 5,900 acre-feet (Water Master Plan; slocountywater.org, 2007). Surface supplies to WPA 4 include water from Salinas and Whale Rock Reservoirs (principally supplying the City of San Luis Obispo), Lopez Reservoir (to Avila Beach) plus State Water supplies (to Avila CSD, Avila Valley MWC, and others). A seawater desalination plant is operated at the Diablo Canyon Nuclear Power Plant to satisfy high quality process water needs at the plant. Non-groundwater supply is estimated at approximately 8,073 AFY (Water Master Plan; slocountywater.org, 2007).

WPA 5 - Five Cities (Portions of San Luis Bay Inland, Huasna/Lopez, and South County Inland Planning Areas). The Five Cities (Arroyo Grande, Pismo Beach, Shell Beach, Oceano, and Grover Beach) are all on groundwater wells and the Lopez system. The systems share common service area boundaries that do facilitate emergency interconnections; several system interties are in place today.

WPA 5 includes the Pismo Creek-Edna Valley Basin and the Arroyo Grande Plain and Tri-Cities Mesa portion of the Santa Maria Valley Basin. Management issues in these areas include the impact of Lopez Dam modifications, increasing demands on water resources, wastewater reuse, and localized high levels of nitrate concentrations. Sea water intrusion is a potential impact which could result from excessive pumping and inadequate recharge. Combined, these basins provide an estimated 9,320 to 10,320 AFY to the water planning area (Water Master Plan; slocountywater.org, 2007). Surface supplies to WPA 5 include water from Lopez Reservoir, State Water supplies, and stream flow. Non-groundwater supply is estimated at approximately 10,657 AFY (Water Master Plan; slocountywater.org, 2007).

WPA 6 - Nipomo Mesa (Portions of South County Coastal and South County Inland Planning Areas). WPA 6 includes the Nipomo Mesa and Oso Flaco portions of the Santa Maria Basin, which are within San Luis Obispo County. The water management issues in these areas include increasing overdraft conditions in the Nipomo Mesa area, well interference from groundwater pumping, water quality issues related to agricultural return flow and domestic wastewater return flow and saltwater intrusion. The portions of the Santa Maria Groundwater Basin within SLO County provide an estimated 19,900 AFY under worst case conditions, which includes areas underlying the Nipomo Mesa, Tri-Cities Mesa, and Santa Maria Valley (*Water Supply in the Nipomo Mesa Area*, SLO County, November 2004). Non-groundwater supplies consist of some reclaimed water being used for irrigation purposes. However, surface water yield for domestic purposes is assumed to be 0 AFY (Water Master Plan; slocountywater.org, 2007).

WPA 7 - Cuyama (Portions of Shandon-Carrizo, Los Padres, and Huasna/Lopez Area Plans). Water service to the Cuyama area is provided by small isolated water systems that lack interties. Within WPA 7, the Cuyama groundwater basin is in an overdraft condition. The basin provides an estimated safe yield of approximately 8,000 AFY to the water planning area. Surface water yield is assumed to be 0 AFY (Water Master Plan; slocountywater.org, 2007).

WPA 8 - California Valley (Portions of Shandon-Carrizo Planning Area). Water service to the California Valley area is provided by small isolated water systems that lack interties. Water is supplied to the California Valley through groundwater extraction from the Carrizo Plain basin. Estimates of groundwater availability indicate a safe seasonal yield of approximately 600 acre-feet. However, this estimate comes from data published in 1958. In addition, it should be noted that much of the Carrizo Plain basin has not been studied in detail, and true perennial yield values are not known. Surface water yield is assumed to be 0 AFY (Water Master Plan; slocountywater.org, 2007).

WPA 9A - Salinas (Portions of Salinas River, Los Padres, Las Pilitas, El Pomar-Estrella, Adelaida and Nacimiento Area Plans). The three largest communities in WPA 9A (Paso Robles, Atascadero, and Templeton) operate separate water distribution systems. Templeton CSD and Paso Robles have a system intertie at Highway 46 and Theater Drive. The distance between Templeton and Atascadero's systems is approximately 1.5 miles. Similarly, Santa Margarita's water system does not adjoin any other community systems, though the Salinas Pipeline (which delivers water to City of San Luis Obispo and Cal Poly) traverses the Santa Margarita service area. San Miguel does not adjoin any other community water system.

Water is supplied to WPA 9A through groundwater extraction from the Paso Robles, Pozo and Cholame basins. Estimates of groundwater availability indicate a yield of approximately 48,000 AFY (Water Master Plan, 2005). Groundwater supplies are augmented by an estimated 3,693 AFY of appropriated stream flows. Releases from Salinas Reservoir benefit groundwater basin recharge and help maintain a "live stream" flow in the Salinas River.

WPA 9B - Creston (Portions of El-Pomar/Estrealla, Los Padres, Las Pilitas, and Shandon-Carrizo Area Plans). Water service to the Creston area is provided by small, isolated water systems that lack interties. Similar to WPA 9A, water is supplied to WPA 9A through groundwater extraction from the Paso Robles, Pozo and Cholame basins. Agricultural water uses are predominant. Estimates of groundwater availability indicate a yield of approximately 48,000 AFY (Water Master Plan; slocountywater.org, 2007). Groundwater supplies are augmented by an estimated 263 AFY of appropriated flows along Huerhuero Creek.

WPA 9C - Shandon (Portions of Shandon/Carrizo, El Pomar-Estrella, and Los Padres Area Plans). Water service to the Shandon area is provided by small, isolated water systems that lack interties. Similar to WPA 9A and 9B, water is supplied to WPA 9C through groundwater extraction from the Paso Robles, Pozo and Cholame basins. Agricultural water uses are predominant. Estimates of groundwater availability indicate a yield of approximately 48,000 AFY (Water Master Plan; slocountywater.org, 2007). Groundwater supplies are augmented by a 100 AFY entitlement in the State Water Project and 38 AFY of appropriated flows along the San Juan Creek and Estrella River systems.

WPA 10 - Nacimiento (Portions of Nacimiento and Adelaida Area Plans). No source of groundwater supply in WPA 10 has been identified (Water Master Plan, 2005). However, approximately 1,200 AFY of San Luis Obispo County Flood Control and Water Conservation District's entitlement at Lake Nacimiento benefits users in WPA 10 (Water Master Plan; slocountywater.org, 2007).

c. Water Demand. The following discussion of County water demand has been adapted from the San Luis Obispo County Water Master Plan, as most recently updated, supplemented with data from slocountywater.org (2007), and additional data provided by the Nipomo Community Services District (*Water Supply in the Nipomo Mesa Area*, November 2004). Existing demand can be separated into three main types of demand: urban, agricultural, and rural.

WPA 1 - North Coast (North Coast Planning Area). The total existing and future demands for WPA 1 are listed in Table 4.10-2. As discussed in Section 4.10.1(b) above, existing supplies total 10,401 AFY. Based on the existing demand of approximately 1,570 AFY, there appears to be a water surplus of approximately 8,831 AFY. However, limited supply is available in many small basins, and is often inaccessible to the urban demands (Water Master Plan; slocountywater.org, 2007). Larger demands are dependent upon single basins (e.g. Hearst Ranch, East/West Ranch, CCSD, and San Simeon Acres). In addition, seasonal peaking in demand coincides with summer shortages in supply (Water Master Plan; slocountywater.org, 2007).

Table 4.10-2 WPA 1 Demand by Category

Category of Demand	Existing Demand (AFY)	2020 Demand (AFY)	Buildout Demand (AFY)
Urban	700	1,230	2,770
Agricultural	430	360	540
Rural	440	790	790
Total	**1,570**	**2,380**	**4,100**

Source: Water Master Plan; slocountywater.org, 2007.

WPA 2 - Cayucos (Portions of Estero and Adelaina Planning Areas). The total existing and future demands for WPA 2 are listed in Table 4.10-3. An increase in irrigation efficiency accounts for the reduction in projected agricultural demand. As discussed in Section 4.10.1(b) above, existing supplies total 3,415 AFY, resulting in a water surplus of approximately 1,685 AFY. A surplus of approximately 1,625 AFY is expected in 2020, while a surplus of approximately 1,165 is expected at buildout (Water Master Plan; slocountywater.org, 2007).

Table 4.10-3 WPA 2 Demand by Category

Category of Demand	Existing Demand (AFY)	2020 Demand (AFY)	Buildout Demand (AFY)
Urban	470	580	750
Agricultural	740	530	820
Rural	520	680	680
Total	**1,730**	**1,790**	**2,250**

Source: Water Master Plan; slocountywater.org, 2007.

WPA 3 – Los Osos/Morro Bay (Portions of Estero Planning Area). The total existing and future demands for WPA 3 are listed in Table 4.10-4. As discussed in Section 4.10.1(b) above, existing supplies total 8,962 AFY, resulting in a water deficit of approximately 2,238 AFY. However, according to the Water Master Plan (2005), the deficit appears to be overstated because the Dairy Creek Reclamation project is not yet included in the supply totals. Nonetheless, a deficit of approximately 2,278 AFY is expected in 2020, while a deficit of approximately 6,238 is expected at buildout (Water Master Plan; slocountywater.org, 2007).

Table 4.10-4 WPA 3 Demand by Category

Category of Demand	Existing Demand (AFY)	2020 Demand (AFY)	Buildout Demand (AFY)
Urban	3,700	5,170	6,930
Agricultural	6,880	5,290	7,490
Rural	620	780	780
Total	**11,200**	**11,240**	**15,200**

Source: Water Master Plan; slocountywater.org, 2007.

WPA 4 – San Luis Obispo/Avila (San Luis Obispo, San Luis Bay Coastal, and San Luis Bay Inland Planning Areas). The total existing and future demands for WPA 4 are listed in Table 4.10-5. As discussed in Section 4.10.1(b) above, existing supplies total 13,973 AFY, resulting in a water deficit of approximately 237 AFY. A deficit of approximately 4,407 AFY is expected in 2020, while a deficit of approximately 7,677 AFY is expected at buildout (Water Master Plan, 2005). According to the Water Master Plan, the City of San Luis Obispo is considering options for future supply, including Nacimiento water, Salinas Dam water and water reuse. The City experienced severe shortages during drought.

Table 4.10-5 WPA 4 Demand by Category

Category of Demand	Existing Demand (AFY)	2020 Demand (AFY)	Buildout Demand (AFY)
Urban	8,470	13,260	14,490
Agricultural	4,970	4,020	6,060
Rural	770	1,100	1,100
Total	**14,210**	**18,380**	**21,650**

Source: Water Master Plan; slocountywater.org, 2007.

WPA 5 – Five Cities (Portions of San Luis Bay Inland, Huasna/Lopez, and South County Inland Planning Areas). The total existing and future demands for WPA 5 are listed in Table 4.10-6. Anticipated changes in cropping acreage in the Five Cities WPA include an increase in vegetable, vineyard, and deciduous crops, coupled with declining irrigated pasture. The combined effect of these anticipated changes contributes to a fairly steady agricultural water demand.

As discussed in Section 4.10.1(b) above, existing supplies total 19,997 AFY, resulting in a water deficit of approximately 4,563 AFY. A deficit of approximately 6,373 AFY is expected in 2020, while a deficit if approximately 12,163 AFY is expected at buildout (Water Master Plan; slocountywater.org, 2007). According to the Water Master Plan, Edna Valley is experiencing rapid development of vineyards with some additional residential activity. As a result, competition for limited ground water resources will intensify. South County cities have relatively large urban demand and some are projecting considerable growth, especially Pismo

and Arroyo. Lopez Lake is currently under study for new yield estimates and the dam is slated for seismic improvements.

Table 4.10-6 WPA 5 Demand by Category

Category of Demand	Existing Demand (AFY)	2020 Demand (AFY)	Buildout Demand (AFY)
Urban	7,040	10,200	11,990
Agricultural	14,460	12,230	16,230
Rural	3,060	3,940	3,940
Total	**24,560**	**26,370**	**32,160**

Source: Water Master Plan; slocountywater.org, 2007.

WPA 6 - Nipomo Mesa (Portions of South County Coastal and South County Inland Planning Areas). The total existing and future demands for WPA 6 are listed in Table 4.10-7. Anticipated future changes in cropping acreage in the Nipomo Mesa WPA include an increase in nursery and vegetable crops, coupled with declining citrus crops. The combined effect of these anticipated changes contributes to a fairly steady agricultural water demand (Water Master Plan; slocountywater.org, 2007). As discussed in Section 4.10.1(b) above, existing supplies total 19,900 AFY, resulting in an existing water deficit of approximately 9,620 AFY (*Water Supply in the Nipomo Mesa Area*, SLO County, November 2004). At projected buildout, the deficit would increase to 16,300 AFY without another source to augment existing supplies. Both the Nipomo Mesa and Oso Flaco portions of the Santa Maria Basin have been found to be in a state of overdraft (Nipomo Mesa Groundwater Resource Capacity Study and 2005 Santa Barbara County Groundwater Report, respectively).

Table 4.10-7 WPA 6 Demand by Category

Category of Demand	Existing Demand (AFY)	2020 Demand (AFY)	Buildout Demand (AFY)
Urban	3,900	5,030	7,670
Agricultural	22,540	23,860	24,180
Rural	3,080	5,940	4,350
Total	**29,520**	**34,830**	**36,200**

Source: Water Supply in Nipomo Mesa Area, SLO County, 2004..

WPA 7 - Cuyama (Portions of Shandon-Carrizo, Los Padres, and Huasna/Lopez Area Plans). The total existing and future demands for WPA 7 are listed in Table 4.10-8. Anticipated changes in the future cropping acreage in the Cuyama WPA include an increase in vegetable and deciduous crops. Changing crop patterns combined with changes in irrigation efficiency contributes to a fairly steady agricultural water demand (Water Master Plan; slocountywater.org, 2007). As discussed in Section 4.10.1(b) above, existing supplies total 8,000 AFY, resulting in a water deficit of approximately 11,310 AFY. A deficit of approximately 9,310 AFY is expected in 2020, while a deficit of approximately 12,980 AFY is expected at buildout (Water Master Plan; slocountywater.org, 2007).

Table 4.10-8 WPA 7 Demand by Category

Category of Demand	Existing Demand (AFY)	2020 Demand (AFY)	Buildout Demand (AFY)
Urban	0	0	0
Agricultural	18,890	16,820	20,490

Table 4.10-8 WPA 7 Demand by Category

Category of Demand	Existing Demand (AFY)	2020 Demand (AFY)	Buildout Demand (AFY)
Rural	420	490	490
Total	**19,310**	**17,310**	**20,980**

Source: Water Master Plan; slocountywater.org, 2007.

WPA 8 – California Valley (Portions of Shandon-Carrizo Planning Area). The total existing and future demands for WPA 8 are listed in Table 4.10-9. As discussed in Section 4.10.1(b) above, existing supplies total 600 AFY, resulting in a water deficit of approximately 330 AFY. A deficit of approximately 660 AFY is expected in 2020, while a deficit of approximately 700 AFY is expected at buildout (Water Master Plan; slocountywater.org, 2007).

Table 4.10-9 WPA 8 Demand by Category

Category of Demand	Existing Demand (AFY)	2020 Demand (AFY)	Buildout Demand (AFY)
Urban	0	0	0
Agricultural	200	170	210
Rural	730	1,090	1,090
Total	**930**	**1,260**	**1,300**

Source: Water Master Plan; slocountywater.org, 2007.

WPA 9A – Salinas (Portions of Salinas River, Los Padres, Las Pilitas, El Pomar-Estrella, Adelaida and Nacimiento Area Plans). The total existing and future demands for WPA 9A are listed in Table 4.10-10. As discussed in Section 4.10.1(b) above, existing supplies total 51,693 AFY, resulting in a water surplus of approximately 4,613 AFY. However, a deficit of approximately 4,317 AFY is expected in 2020 and a deficit of approximately 28,897 AFY is expected at buildout (Water Master Plan; slocountywater.org, 2007).

Table 4.10-10 WPA 9A Demand by Category

Category of Demand	Existing Demand (AFY)	2020 Demand (AFY)	Buildout Demand (AFY)
Urban	14,450	25,830	41,120
Agricultural	27,180	22,740	31,820
Rural	5,450	7,440	7,440
Total	**47,080**	**56,010**	**80,380**

Source: Water Master Plan; slocountywater.org, 2007.

WPA 9B – Creston (Portions of El-Pomar/Estrealla, Los Padres, Las Pilitas, and Shandon-Carrizo Area Plans). The total existing and future demands for WPA 9B are listed in Table 4.10-11. As discussed in Section 4.10.1(b) above, existing supplies total 48,263 AFY, resulting in a water surplus of approximately 40,163 AFY. A surplus of approximately 38,223 AFY is expected in 2020, while a surplus of approximately 36,283 AFY is expected at buildout (Water Master Plan; slocountywater.org, 2007).

Table 4.10-11 WPA 9B Demand by Category

Category of Demand	Existing Demand (AFY)	2020 Demand (AFY)	Buildout Demand (AFY)
Urban	0	0	0

Table 4.10-11 WPA 9B Demand by Category

Category of Demand	Existing Demand (AFY)	2020 Demand (AFY)	Buildout Demand (AFY)
Agricultural	4,120	3,810	5,750
Rural	3,980	6,230	6,230
Total	**8,100**	**10,040**	**11,980**

Source: Water Master Plan; slocountywater.org, 2007.

WPA 9C – Shandon (Portions of Shandon/Carrizo, El Pomar-Estrella, and Los Padres Area Plans). The total existing and future demands for WPA 9C are listed in Table 4.10-12. As discussed in Section 4.10.1(b) above, existing supplies total 48,138 AFY, resulting in a water surplus of approximately 27,058 AFY. A surplus of approximately 25,178 AFY is expected in 2020, while a surplus of approximately 19,878 is expected at buildout (Water Master Plan; slocountywater.org, 2007).

Table 4.10-12 WPA 9C Demand by Category

Category of Demand	Existing Demand (AFY)	2020 Demand (AFY)	Buildout Demand (AFY)
Urban	0	0	0
Agricultural	20,360	21,890	27,190
Rural	720	1,070	1,070
Total	**21,080**	**22,960**	**28,260**

Source: Water Master Plan; slocountywater.org, 2007.

WPA 10 – Nacimiento (Portions of Nacimiento and Adelaida Area Plans). The total existing and future demands for WPA 10 are listed in Table 4.10-13. As discussed in Section 4.10.1(b) above, existing supplies total 1,200 AFY, resulting in a water deficit of approximately 370 AFY. A deficit of approximately 1,820 AFY is expected in 2020 and at buildout (Water Master Plan; slocountywater.org, 2007).

Table 4.10-13 WPA 10 Demand by Category

Category of Demand	Existing Demand (AFY)	2020 Demand (AFY)	Buildout Demand (AFY)
Urban	0	0	0
Agricultural	0	0	0
Rural	1,570	3,020	3,020
Total	**1,570**	**3,020**	**3,020**

Source: Water Master Plan; slocountywater.org, 2007.

4.10.2 Impact Analysis

a. Methodology and Significant Thresholds. In accordance with Appendix G of the *State CEQA Guidelines*, impacts would be significant if development in accordance with the Affordable Housing Ordinances (AHO) would result in any of the following:

- *Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering or the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a*

level which would not support existing land uses or planned uses for which permits have been granted);

- *Require or result in the construction of new water treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects;*
- *Fail to have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed; or*

Since the Affordable Housing Ordinances do not involve any immediate physical changes or projects, the above guidance is useful only in general terms. The County Resource Management System (RMS) tracks water supply and delivery systems throughout the County, and provides a more specific set of criteria in its evaluation process. The RMS defines the two highest levels of severity for water supply as follows:

- *Level of Severity II: When projected water demand over the next seven years equals or exceeds the estimated dependable supply.*
- *Level of Severity III: When the existing water demand equals or exceeds the dependable supply.*

For water delivery systems, the levels of severity are similar:

- *Level of Severity II: When the water delivery system is projected to reach design capacity within the next five years.*
- *Level of Severity III: When the water delivery system reaches its design capacity.*

For the purpose of the countywide evaluation in this EIR, significant water supply and infrastructure impacts would occur if the demands placed on an area from the increased building allocations proposed by the Affordable Housing Ordinances would exceed the availability of water supply or the capacity of the local serving agency to deliver water.

b. Project Impacts and Mitigation Measures.

Impact WR-1 The proposed Affordable Housing Ordinances would modify the current development standards, leading to increased population and associated water demand. In addition, projects may locate residences in areas of the County where demand for available water is currently at or over capacity. This would be a Class I, *significant and unavoidable,* impact.

Projects in accordance with the proposed Affordable Housing Ordinances (AHO) would increase water demands from groundwater, surface impoundments, and State water sources. Several County planning areas do not have sufficient water resources to meet their planned buildout population, thus, any increase in water demand in these areas would result in a potentially significant impact. The characteristics and potential impact of each ordinance are discussed below.

Program HE 1.4: Revised Residential Development Standards. The overall effect of Program HE 1.4 would be the potential for an additional 2,285 housing units more than are currently developed on the same number of existing RSF and RMF parcels. However, this development

would be consistent with the buildout potential anticipated under the County's General Plan, since the intent of the program is to encourage development densities closer to what are called for under the General Plan. These additional units would result in an associated population increase of approximately 5,370 residents (based upon a population generation factor of 2.35 persons per unit). Using an average water use factor of 164 gallons per capita per day (gpcd) (Table 3, Urban Demand Chapter of the County Master Water Plan 2001, average community use), development encouraged by Program HE 1.4 would be anticipated to demand 880,680 gallons per day (gpd), or approximately 986.5 acre-feet per year (AFY).

Program HE 1.9: Require Development of Affordable Housing. The overall effect of Program HE 1.9 would be an estimated 5,051 additional bonus units. These additional units would result in an associated population increase of approximately 11,870 residents (based upon a population generation factor of 2.35 persons per unit). Using an average water use factor of 164 gallons per capita per day (gpcd) (Table 3, Urban Demand Chapter of the County Master Water Plan 2001, average community use), development encouraged by Program HE 1.9 would be anticipated to demand 1,946,680 gallons per day (gpd), or approximately 2,180 acre-feet per year (AFY).

Program HE 1.10: Establish Minimum Residential Multi-Family Densities. The overall effect of Program HE 1.10 would be the potential for an additional 384 housing units on the identified RMF lots. However, this development would be consistent with the buildout potential anticipated under the County's General Plan, since the intent of the program is to encourage development densities closer to what are called for under the General Plan. These additional units would result in an associated population increase of approximately 902 residents (based upon a population generation factor of 2.35 persons per unit). Using an average water use factor of 164 gallons per capita per day (gpcd) (Table 3, Urban Demand Chapter of the County Master Water Plan 2001, average community use), development encouraged by Program HE 1.10 would be anticipated to demand 147,928 gallons per day (gpd), or approximately 165.7 acre-feet per year (AFY).

Overall, all three Programs would result in the same development potential compared to what could currently occur under the General Plan, but they would encourage densities more consistent with what is envisioned under the General Plan. Buildout consistent with the General Plan, as encouraged by the proposed ordinances, would permit an additional 7,720 units and an associated water demand of approximately 3,332.7 AFY. Since there are no specific plans for individual development projects in accordance with the proposed Affordable Housing Ordinances at this time, it is not possible to determine the distribution of development. A majority of the water planning areas (WPA) do not have sufficient water allotments to meet buildout demands.

Analysis of Areas Identified at Elevated Levels of Severity. According to the County 2006 Annual Resource Summary Report (RSR), WPA 2 and portions of WPA 9a (Garden Farms, San Miguel and Templeton) are rated as having a RSR Level of Severity II (indicating that the projected water demand over the next seven years equals or exceeds the estimated dependable supply). In addition, the following water planning areas are rated as having an RSR Level of Severity (LOS) III (indicating that existing water demand equals or exceeds the dependable supply): WPA 1, WPA 3, WPA 6, WPA 7 and portions of WPA 9a (Santa Margarita). Of these LOS III water planning areas, WPA1, WPA 3 and WPA 6 could experience substantial housing

supply increases as a result of the proposed AHO. WPA 6 (Nipomo Mesa) would experience the highest increase, followed by WPA 3 (Los Osos/Morro Bay) and WPA 1 (North Coast), respectively. Impacts associated with these water planning areas are discussed in greater detail below.

WPA 6 (Nipomo Mesa) was designated as Level of Severity III in June 2007, based on several technical studies performed to support this conclusion. These include the Nipomo Mesa Groundwater Resource Capacity Study (Papadopoulos and Associates, Inc., November 2004), which concluded that existing demand equals or exceeds the dependable supply for the groundwater basin which underlies the Nipomo Mesa. A Resource Capacity Study (RCS) prepared by the San Luis Obispo County Planning department (November 2004) confirmed this conclusion, and further recommended that a Severity Level III be adopted pursuant to the County's Resource Management System. With projected buildout demand in the Nipomo area, there would be a deficit of about 16,300 AFY within this basin (Table 4.10-7). In response to these reports, as well as a Science Applications International Corporation (SAIC) Technical Memorandum detailing groundwater storage decline (SAIC, May 2007), the County of San Luis Obispo certified a Severity Level III for water resources of the Nipomo Mesa Water Conservation Area (NMWCA) on June 26, 2007.

WPA 6 is currently supplied entirely by groundwater. As a result, alternate sources are not currently available for development in Nipomo in accordance with the proposed AHO. However, the Nipomo Community Services District (NCSD) is currently proceeding with plans to acquire supplemental water from the City of Santa Maria. This Waterline Intertie Project is expected to supply approximately 3,000 AFY to the NCSD and could be in operation within three years (Bruce Buell, Personal Communication, January 8, 2008). In addition to the Intertie project, the NCSD currently needs an additional 4,700 AFY (1,700 AFY more than is available from the City of Santa Maria), and anticipates needing approximately 6,300 additional AFY in the future (Buell, January 2008). Due to its relativity quick development time, the Waterline Intertie Project is considered a short-term source for supplemental water. Additional long-term sources will also be required, without which future development within WPA-6 would result in a significant and potentially unmitigable impact.

An *Evaluation of Supplemental Water Alternatives* prepared for the NCSD identified several long-term supplemental water alternatives for the area (*Evaluation of Supplemental Water Alternatives – Technical Memorandum No. 1 Constraints Analysis,* Boyle Engineering Corporation, June 2007). These include:

- Santa Maria River Valley Groundwater
- State Water or Exchange through State Water Pipeline
- Desalinated Seawater or Brackish Water
- Brackish Agricultural Drainage
- Nacimiento Water Project
- Groundwater Recharge with Recycled Wastewater
- Exchange Treated Wastewater for Direct Use

Of the alternatives analyzed, two were determined to have "fatal flaws" that would prevent the NCSD from pursuing them as viable (Santa Maria Valley Groundwater and Nacimiento Water Project Extensions) while two were determined to be infeasible or ineffective (Oso Flaco

Drainage and Groundwater Recharge or Reuse). However, two alternatives were identified as potentially viable: Seawater Desalination and State Water (specifically the acquisition and storage of off-peak or excess capacity). Seawater Desalination was further analyzed in September 2007 (*Evaluation of Desalination as a Source of Supplemental Water – Technical Memorandum No. 2 Work Plan for Project Implementation,* Boyle Engineering Corporation, September 28, 2007), while State Water was further analyzed in November 2007 (*Evaluation of Supplemental Water Alternatives – Technical Memorandum No. 3 Implementation of Water Supply from CCWA/State Water Pipeline,* Boyle Engineering Corporation, November 30, 2007). These supplemental analyses concluded that desalination would be the most reliable water supply available to the district. According to the NCSD, desalination will be pursued and may be available within 8 to 10 years (Boyle, September 2007; Buell, January 2008).

If water from these potential sources becomes available, there would be sufficient water to serve development envisioned under the proposed project, as well as other cumulative development within the area. However, it cannot be assured at this time that sufficient water from these sources will become available, so a significant impact could remain.

WPA 3 (Los Osos/Morro Bay) is designated in the 2006 RSR as a Level of Severity III and has a water deficit of approximately 2,238 AFY. As noted under Section 4.10.1(b), current water supply for WPA 3 includes groundwater and the following non-groundwater supplies: Whale Rock Reservoir, seawater desalination, State Water supplies, and stream flow.

In order to augment the water supply deficit for the region, a recycled water study was conducted to identify the potential for recycled water use from the future Los Osos wastewater treatment plant. The study projected 115 AFY of savings in potable water pumping by irrigating area schools, the Los Osos Community Park and the Sea Pines Golf Course (http://www.losososutilities.org/index.html). In addition, recommendations of a report prepared by Cleath Associates, upon which the Los Osos Community Services District (LOCSD) Water Management Plan is based, are currently being implemented by LOCSD and Golden State Water Company (2006 RSR). Well fields are being modified to increase withdrawals in eastern portions of the basin and reduce pumping in western portions, with an emphasis on pumping from the upper rather than the lower aquifer.

If water from these potential sources becomes available, there would be sufficient water to serve development envisioned under the proposed project, as well as other cumulative development within the area. However, it cannot be assured at this time that these strategies will succeed in reducing or eliminating the water supply deficit.

WPA 1 (North Coast) is designated in the 2006 RSR as a Level of Severity III. Existing water supply for WPA 1 includes both groundwater and stream flow sources. In December 2005, the Cambria Community Services District (CCSD) Board adopted an update to its Urban Water Management Plan (UWMP) that calls for continuation of aggressive water conservation measures, development of a recycled water system for non-potable uses, and seawater desalination for an additional potable water supply. The UWMP also outlines the CCSD's tiered water rate structure as well as a drought surcharge rate that is implemented during summer periods. As part of the North Coast Area Plan Update, community plans for Cambria and San Simeon Acres were adopted by the Board of Supervisors in April 2006. The update includes provisions that would substantially reduce Cambria's residential buildout potential.

Concurrently, the CCSD is completing a buildout reduction program for retiring vacant residential lots. These initiatives will reduce the requirement for additional water, although water from desalination or some other source will be needed to serve Cambria's existing waiting list and provide long-term drought protection for existing customers (2006 RSR).

If water from these potential sources becomes available, there would be sufficient water to serve development envisioned under the proposed project, as well as other cumulative development within the area. However, it is not currently known when additional sources, including desalination, may be available to the area.

Overall, future supplies to WPA 6, WPA 3, and WPA 1 cannot be assured at this time. Should development occur in these or other areas where sufficient water supply may not be available, impacts would be potentially significant.

Mitigation Measures. As required by Title 18 of the San Luis Obispo County Code, future applicants shall pay applicable public facilities fees, including connection fees, which cover the system improvements that are needed to accommodate the additional requested service. These fees will help fund necessary infrastructure improvements to water collection/delivery networks for future projects that would occur under the Affordable Housing Ordinances. In addition, the following mitigation measures are required:

WR-1(a) **Proof of Water Supply.** Future applicants for projects subject to the Affordable Housing Ordinances shall provide proof of an adequate, safe and continuous supply of water to the proposed project.

Additional residential development within areas designated as Level of Severity III (WPA 1, WPA, 3 and WPA-6) shall not be allowed unless the local agency responsible for ensuring adequate water supply determines that there is available water to meet long-term needs of the area in question. This determination will be based on the outcome of water master planning efforts. If additional water is needed, the master planning efforts must identify potential sources, their feasibility, and a mechanism to ensure that such sources will be acquired.

WR-1(b) **Water Conservation Measures.** Future applicants subject to the Affordable Housing Ordinances shall implement water conservation measures, including, but not limited to:

- Use of low-flush (1.6-gallon per flush) toilets shall be required in all new construction;
- Installation of low flow (2 gpm) shower heads shall be required on all new residential units;
- Drought tolerant plants shall be used in landscaping;
- Landscaping shall use drip irrigation where feasible;
- Plant material shall be grouped by water needs;
- Extensive mulching (2-inch minimum depth) shall be used in landscaped areas, where feasible, to improve the water

holding capacity of the soil by reducing evaporation and compaction; and/or

- Permeable surfaces such as turf block or intermittent permeable surfaces such as French drains shall be used for parking areas and driveways, where feasible and practical.

Significance after Mitigation. Implementation of WR-1(b) (Water Conservation Measures) would incrementally reduce overall water demand associated with future development from the Affordable Housing Ordinances. However, WR-1(a) (Proof of Water Supply) may be difficult to achieve in some areas due to the lack of dependable supply in portions of the County where water planning areas are rated as having an LOS II or III. Although short- and long-term supplemental supplies have been identified for some areas, the exact timing and success of these supplies cannot be assured at this time. As a result, impacts would remain significant and unavoidable.

Should additional water sources be available, however, implementation of WR-1(a) (Proof of Water Supply) may require extension of water lines and/or construction of desalination plant(s), which could result in residual environmental impacts. Physical impacts associated with State water lines have been addressed in several certified Environmental Impact Reports (EIRs). These EIRs have been incorporated by reference into the Affordable Housing Ordinances EIR: State Water Project (SWP) Coastal Branch Phase II and Mission Hills Extension Final EIR (State of California Division of Planning, May 1991), State Water Project Coastal Branch (Phase II) Local Distribution Lines and Facilities Final EIR (ERCE, March 1992), and a Supplement to the SWP Coastal Branch Phase II and Mission Hills Extension Final EIR (State of California Division of Planning, October 1994). The previous environmental documents incorporated by reference are summarized in Section 1.0, *Introduction to Revised Draft EIR*.

The documents listed above addressed impacts associated with State Water Project, and all included assessments of cumulative and growth inducing impacts. It should be noted, however, that connections to SWP water lines as well as installation of additional SWP connector pipelines and associated infrastructure in the Nipomo and/or Los Osos areas, as applicable, could result in residual environmental impacts not previously analyzed in the State Water EIRs. This may include, but would not be limited to, impacts relating to agricultural and biological resources, geologic hazards, and drainage/erosion. Since the precise location of potential State water pipelines has not been determined, precise environmental impacts associated with such improvements would be too speculative to address at this time. Environmental impacts associated with potential future connections to the State Water Project would be evaluated in a separate environmental document prepared pursuant to the California Environmental Quality Act (CEQA).

Physical impacts associated with the potential future construction of desalination plants in the Nipomo and/or North Coast areas have not been addressed in previous environmental documentation because no such projects have been proposed. Physical impacts associated with the proposed NCSD Waterline Intertie Project have been previously analyzed, although environmental documentation has not yet been certified for this project and cannot, therefore, be incorporated herein. Potential future impacts from either desalination or an Intertie could include, but would not be limited to, impacts relating to agricultural, biological, and cultural resources, as well as impacts on water quality and noise. Since the precise location and capacity

of potential desalination plants have not been determined, and because documentation regarding the impacts of the Waterline Intertie Project has not been certified, precise environmental impacts associated with such facilities would be too speculative to address at this time. In addition, the timing of potential future desalination projects has not yet been determined, nor is the timing of the Waterline Intertie Project certain. Environmental impacts associated with desalination plant construction and operation would be evaluated in a separate environmental documentation prepared pursuant to the California Environmental Quality Act (CEQA).

Remaining potential water sources for WPA 3 and WPA 1 would not result in residual environmental impacts because they include water conservation, increased withdrawals, and recycled water, which would not require construction or installation of new facilities.

c. Subsequent CEQA Review Consideration: Program HE 1.10. The parcels that have been identified to have the minimum density requirement under program HE 1.10 have been analyzed in relation to the above listed impacts and associated mitigation measures. Appendix C includes a table that presents each parcel and identifies which, if any, of the above listed mitigation measures would apply to a development project on that parcel.

d. Cumulative Impacts. Cumulative water resource impacts associated with future additional development from the Affordable Housing Ordinances would incrementally increase domestic water supply demand. In some cases, this additional demand could be added to areas of the County where existing water demand equals or exceeds the dependable supply. Therefore, the Affordable Housing Ordinances would have a cumulatively considerable impact on County water resources, since project-specific mitigation would not reduce potential impacts to a less than significant level.