

**From:** [REDACTED]  
**To:** [REDACTED]; [BoardComment](#)  
**Subject:** Public Comment 9-28-21 Finance Committee Agenda Item 3.A Under-Funded Activities  
**Date:** Sunday, September 26, 2021 6:32:43 PM  
**Attachments:** [TDC Document Summary.pdf](#)

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We have reviewed the agenda package report on Under-Funded Activities and we have the following comments for your consideration.

- The paragraph titled "Vacant Lots owned by CCSO" states "Attempt to divest as many of these lots as possible" and "No additional real estate should be accepted by CCSO without guaranteed funding for its maintenance".
- Many of the lots owned by CCSO have Conservation Easements on them. Divesting these lots will require approval by The Land Conservancy of San Luis Obispo, the California Coastal Conservancy and the County.
- The CCSO has committed to acquiring and retiring from development vacant lots in accordance with the Buildout Reduction Program and the Transfer Development Credits (TDC) Program. Implementation of these programs will be a condition of approval for water supply related Coastal Development Permits for projects such as the Water Reclamation Facility.
- In addition, by providing an opportunity for property owners to sell undeveloped parcels the BRP and TDC substantially reduce the risk of litigation by such property owners related to the issue of water connections and building permits in the future (From BRP Report page 4).
- The attached TDC Document Summary lists several documents related to the Conservation Easement/TDC lots. These documents as well as the Memorandum of Understanding between CCSO and LCSLO are available on the website [cambriaforestcommittee.org](http://cambriaforestcommittee.org).
- Crosby and Laura Swartz

## **TDC document summary**

Transfer Development Credits are a mechanism by which undeveloped lots are legally retired from development. Their use is permanently restricted to open space. The development rights associated with them can be transferred to areas in Cambria where development is better suited and which will have a reduced impact on the health of the native Monterey pine forest. Landowners who wish to exceed present county development standards can purchase TDCs from The Land Conservancy. That money is then used to purchase additional undeveloped lots and retire them from development, perpetuating the program.

The CCSD's partnership with LCSLO on a long-term basis is a significant part of implementing the BRP.

Several legal and regulatory documents are involved in the program. Those documents are collected here on the Cambria Forest Committee website for your convenience.

Title 23, Land Use Ordinance, of the San Luis Obispo County Code, Section 23.04.440, defining and codifying TDCs.

Chapter 6, Combining Designations, Section 17, and Figure 6.2 of the North Coast Area Plan, the governing legal language for the TDC program.

Chapter 7, Planning Area Standards, Paragraphs B and C, Figures 7-18 and 7-19, of the North Coast Area Plan, defining TDCs and specifying where and how they are to be used.

The Deed of Conservation Easement between the Cambria Community Services District and the Land Conservancy of San Luis Obispo, which specifies the legal status of the retired property.

The 2007 Coastal Conservancy Staff Recommendation for \$200,000 funding for the Cambria/Lodge Hill Restoration Program.

A 2011 letter from the Coastal Conservancy discussing the funding and status of the TDC program.

An abstract of the Cambria Lodge Hill Restoration Program, 1984-2011.