## Sarah Mayer Public Comment -

City of Carpinteria () Community Development Department

From:

PAD LRP Housing Element

Sent:

Thursday, April 25, 2024 10:34 AM

To:

sbcob

Subject:

FW: City of Carpinteria Letter to County Planning Commission

**Attachments:** 

City Letter to SBCo PC\_03.28.24.pdf

#1

From: Mindy Fogg <mindyf@carpinteriaca.gov>
Sent: Thursday, March 28, 2024 11:35 AM
To: Villalobos, David <dvillalo@countyofsb.org>

Cc: Nick Bobroff <nickb@carpinteriaca.gov>; Plowman, Lisa <lplowman@countyofsb.org>; Tuttle, Alex

<a href="mailto:</a> <a href="mailto:Atuttle@countyofsb.org">Atuttle@countyofsb.org</a>; PAD LRP Housing Element <a href="mailto:housingelement@countyofsb.org">housingelement@countyofsb.org</a>;

Subject: City of Carpinteria Letter to County Planning Commission

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Hi David,

Please find enclosed our letter to the Planning Commission on Item VI.1 (Housing Element Rezones) on the April 1, 2024 hearing agenda.

Thank you,



Mindy Fogg (she/her)
Community Development Department
City of Carpinteria
5775 Carpinteria Ave, Carpinteria, CA 93013

Direct Line: (805) 755-4408 | mindyf@carpinteriaca.gov

CarpinteriaCA.gov

### CITY of CARPINTERIA, CALIFORNIA



March 28, 2024

Chair Martinez and Honorable Commissioners County of Santa Barbara 123 East Anapamu Street Santa Barbara, CA 93101

Via email to Hearing Support: <a href="mailto:dvillalo@countyofsb.org">dvillalo@countyofsb.org</a>

Re: Comments on the Proposed Rezones and the 2023-2031 Housing Element Update

Program Environmental Impact Report, 23EIR-00004

Dear Chair Martinez and Honorable Members of the Planning Commission:

The City of Carpinteria ("City") has been closely following the County's Housing Element Update process. We appreciate the challenges faced by the County and other local jurisdictions, ourselves included, in updating and implementing our Housing Elements in a way that satisfies our respective regional housing needs assessment ("RHNA") allocations and meets the California Department of Housing and Community Development's ("HCD) standards.

However, we continue to object to the rezoning of candidate sites in Carpinteria Valley that we believe would be in direct conflict with local and State law. As discussed in more detail in our previous letters dated February 28th and August 28th of 2023 (attached), given that these are productive agricultural sites located outside the urban-rural boundary and within the California Coastal Zone ("Coastal Zone"), conversion to high density urban development would be grossly inconsistent with Resource Protection policies of the California Coastal Act ("Coastal Act") as well as the specific goals, policies and regulations of the County and City's respective Local Coastal Programs ("LCPs"). Since conversion of these sites into residential development would also require annexation into the Carpinteria Sanitary District, it appears the rezoning of these sites would also be in conflict with several policies set by the Local Agency Formation Commission (LAFCO) to discourage conversion of prime agricultural lands. Moreover, inclusion of these rezone sites would result in numerous Class I (i.e., significant and unavoidable) environmental impacts, the severity of which can easily be substantially reduced or avoided entirely by simply selecting a project alternative that excludes these sites from further consideration. Due to these policy inconsistencies and readily available less impactful alternatives, the Planning Commission cannot make the required findings in Staff Report Attachment A for the Carpinteria-adjacent rezone sites.

County of Santa Barbara Planning Commission March 28, 2024 Page 2

#### Agricultural Site Rezones: Van Wingerden 1 and 2

The Planning Commission Staff Report for the County's Housing Element rezone sites and Program Environmental Impact Report ("PEIR") notes that to rezone the Van Wingerden 1 and 2 sites to high-density residential and remain in compliance with the County Land Use and Development Code and Coastal Zoning Ordinance, the Urban/Rural Boundary ("Boundary") would need to be moved such that these two sites are added to the Urban Area. While this strategy may appease some County policies, it defeats the Urban/Rural Boundary's entire purpose of containing urban development. Moving the Boundary ignores the land resources policies of the Coastal Act that are expressly intended to establish and preserve "stable boundaries separating urban and rural areas" (Pub. Resources Code Sec. 30241(a)). Given that there are numerous other rezone site options in the South County already within the Urban/Rural Boundary, the County must consider and utilize all non-agricultural sites and sites within existing developed and urban areas prior to rezoning any agricultural land for other development (Pub. Resources Code Secs. 30241(d); and 30250(a)).

Additionally, rezoning the Van Wingerden 1 and 2 sites contradicts agricultural protection policies in the County's Comprehensive Plan. One of the fundamental goals of the Land Use Element is to preserve both prime and non-prime soils for agricultural use (noted in PEIR Page 3.10-14). The Agricultural Element outlines several policies that require protection of agricultural land, including Policy I.F., which includes maintaining a stable Urban/Rural Boundary to protect agricultural soils. Eliminating agricultural sites for housing also conflicts with Policy III.A, that states: "expansion of urban development into active agricultural areas outside of urban limits is to be discouraged, as long as infill development is available." The County's own "Balancing Act" interactive website prepared for the Housing Element demonstrates that such sufficient sites located within existing urban areas of the unincorporated South Coast are available to meet the County's RHNA. The County's Costal Land Use Plan (Policy 8-3) and Coastal Zoning Ordinance (Section 35-64) also contain specific criteria for conversion of agricultural lands to a non-agricultural zone district, which neither of the Van Wingerden sites meet. Nor has the County provided the necessary determination of agricultural viability and economic feasibility required by the Coastal Act (Pub. Resources Code Sec. 30241.5) to support such conversion of agricultural lands. Thus, moving the Urban/Rural Boundary to accommodate high-density residential use on agriculturally-zoned land when the County maintains other possible rezone sites is not consistent with the County's local land use regulations or the California Coastal Act.

The City does, however, acknowledge that the "Van Wingerden 2" site could *potentially* be a suitable site for conversion to housing for agricultural employees and/or farmworkers. However, a zoning change from AG-I to Design Residential would not be necessary to accommodate such a project at this site. As stated on pg. 4-9 of the PEIR, the Van Wingerden sites "were included because the property owner *may* partner with a local non-profit housing organization to redevelop the sites for farmworker and/or lower-income housing." Under the County's Coastal Zoning Ordinance, a farmworker housing complex may be permitted in the AG-I zone with a Coastal Development Permit (CDP; Article II, Section 35-144P). Such an approach would avoid the above-summarized policy inconsistency issues resulting from the contemplated rezone, and more importantly, would

County of Santa Barbara Planning Commission March 28, 2024 Page 3

provide critically-needed housing expressly dedicated to agricultural employees and farmworkers. Thus, we recommend that the County and/or property owner pursue the existing and available CDP option before initiating an unwarranted spot zone.

#### Upzoning the Bailard Site

The Bailard site (as well as the Van Wingerden sites discussed above) sits on the City-County boundary and, as noted in the City's General Plan/Coastal Land Use Plan ("GP/CLUP"), is within the City's planning area. Our Land Use Element "strongly favors a firm urban/rural boundary between the incorporated area... and the rural areas of Carpinteria Valley" (Carpinteria GP/CLUP Page 17). The City strives to maintain a lowdensity buffer between the City's denser urban neighborhoods and the rural agricultural land in the unincorporated Valley—this is core to our identity as a small beach town (GP/CLUP Objective LU-3) and to discourage the gradual encroachment of urban development into the surrounding agricultural areas of the Valley. The Bailard site's current 3-E-1 zoning optimally meets this purpose, and aligns with Land Use policies for the City's planning area. Allowing the densest residential zoning in the Carpinteria Valley to be placed on this Urban/Rural Boundary site contradicts both the Land Use policies and character that City and County residents deeply value. Many of the same policy inconsistency issues raised above for the Van Wingerden 1 and 2 sites relative to defeating the purpose of a stable Urban/Rural Boundary apply equally to this site. The City is also concerned that future residents of the Bailard and Van Wingerden sites would place a substantial and unmitigated burden on the City's infrastructure and services, while solely benefitting the County's RHNA allocation.

In addition, the Commission should not recommend a rezone of the Bailard site because, as stated on page 14 of the Planning Commission Staff Report, an adjacent 2.5-acre parcel would also need to be moved into the Urban Area to maintain County CLUP consistency for a Bailard site rezone. As this parcel could not be rezoned with the Housing Element sites, it would create a single parcel with 3-E-1 zoning isolated from other rural residential-zoned sites. This contrived zoning scenario does not reflect good planning practice.

#### Project Alternatives Considerations

As noted above and in our attached letters from 2023, the Bailard and Van Wingerden 1 and 2 rezone sites support productive agriculture in the Coastal Zone near or adjacent to other productive agricultural properties. Therefore, we believe your Commission should not recommend these sites for rezoning. As stated on pg. 4-9 of the PEIR: "The California Coastal Act requires that the California Coastal Commission (CCC) approve (i.e., certify) rezones in the Coastal Zone. This requirement combined with regulatory barriers makes the construction of housing units on these agricultural parcels unlikely by 2031." We request that your Commission consider only non-coastal sites at this time for the implementation of Program 1 (Adequate Sites for RHNA and Monitoring of No Net Loss) within the housing cycle timeframe. A non-coastal alternative could easily be considered

County of Santa Barbara Planning Commission March 28, 2024 Page 4

and adopted without further change to the PEIR. Such an alternative would be feasible based on the County's "Balancing Act" tool and project objectives. Moreover, it would greatly reduce significant environmental impacts as compared to the proposed project in the PEIR, thereby reducing the County's mitigation requirements and resolving the numerous policy inconsistencies noted above.

However, should you wish to select only from those alternatives already described in the PEIR for the sake of expediency, we would urge you to recommend the "Sustainable Communities" project alternative that eliminated the Van Wingerden Sites.

### Planning Commission Findings

Due to the above-described inconsistencies with the Coastal Act, County CLUP, Carpinteria Planning Area policies, and LAFCO policies, as well as the extensive Class I impacts identified in the PEIR for the proposed project, the City concludes that several of the required findings for approval provided in Attachment A to the Planning Commission Staff Report cannot be made to approve the proposed amendments to the County's Comprehensive Plan, Development Code, and Zoning Map. Findings 4.1.2 and 4.2.2 speak to consistency with the Comprehensive Plan, the CLUP, the requirements of State planning and zoning laws, and other County Codes. As demonstrated above, rezoning the Bailard and two Van Wingerden sites is in direct conflict with multiple Coastal Act and Comprehensive Plan policies related to the protection of agricultural land and the Urban-Rural Boundary. Findings 4.1.3 and 4.2.3 state "the [rezones are] consistent with good zoning and planning practices." Expanding the Urban-Rural Boundary specifically to permit three high-density residential sites at this Boundary negates the aim of such a delineation, breaks up the rural and agricultural land uses within the Carpinteria Valley, akin to several isolated spot zones. To ensure these findings can be properly made, the City urges the County to remove Van Wingerden Sites 1 and 2 and the Bailard site from the rezone list.

Our staff would be happy to meet and discuss our concerns and comments on the Housing Element Update and PEIR with County staff. If you would like to set up such a meeting, please contact Mindy Fogg, Principal Planner, at 805-755-4408 or at <a href="mindyf@carpinteriaca.gov">mindyf@carpinteriaca.gov</a>. We thank you for taking the time to consider and address our comments.

Sincerely,

Nick Bobroff, Director

Community Development Department

#### Enclosures:

City Letter to County on Draft Housing Element dated February 28, 2023 City Letter to County on Draft Housing Element dated August 29, 2023

Cc. Lisa Plowman, Planning Director (<a href="mailto:lplowman@countyofsb.org">lplowman@countyofsb.org</a>)
Alex Tuttle, Long Range Division Deputy Director (<a href="mailto:atuttle@countyofsb.org">atuttle@countyofsb.org</a>)
County Long Range Planning Division (housingelement@countyofsb.org)

## CITY of CARPINTERIA, CALIFORNIA



February 28, 2023

Board of Supervisors
County of Santa Barbara
c/o Jessi Steele, Long Range Planning Division Via email: <a href="mailto:housingelement@countyofsb.org">housingelement@countyofsb.org</a>

Re: Santa Barbra County Draft 2023 – 2031 Housing Element Update

Dear Chair Williams and Honorable Members of the Board of Supervisors:

The City of Carpinteria has been closely following the County Housing Element Update process. We appreciate the challenges faced by the County and other local jurisdictions, ourselves included, in crafting a Housing Element Update that satisfies our respective regional housing needs assessment (RHNA) allocations and meets HCD's high bar for certification. We recognize the need for all areas of the County to share in meeting regional housing needs and that difficult decisions must be made concerning where and how to accommodate needed housing.

The City of Carpinteria City Council offers these comments on the Draft 2023 – 2031 Santa Barbara County Housing Element in the spirit of interagency cooperation and collaboration on housing policies that best serve the Carpinteria Valley and its residents. In consideration of the need to provide the state-mandated housing and, in particular, affordable housing, in southern Santa Barbara County, we are requesting two items:

- Modifications to the proposed housing sites in the Carpinteria Valley; and
- County commitment to implement policies and programs aimed at preventing displacement and promoting affordable housing.

#### **Proposed Housing Sites in the Carpinteria Valley**

Agriculture remains an important element of the Carpinteria Valley's identity and economic base, and the desire to protect and preserve the Valley's agricultural heritage going forward is critical. State Housing Element Law requirements to plan for adequate housing sites do not take precedence over the Resource Protection policies of the California Coastal Act ("Coastal Act") and as embodied in the policies and regulations of County and City's respective Local Coastal Programs ("LCPs"). Guidance from the Coastal Commission on this issue cites the need to instead harmonize State Housing laws with Coastal Act policies.

The County's Draft Housing Element fails to adequately take into account the Resource Protection policies of the Coastal Act, including Coastal Act policies embodied in the County's LCP, with regard to protection of Agricultural Resources. Numerous County and City LCP Policies address Agricultural Buffers and the need to protect agricultural lands/operations from urban residential development (see, e.g., County Article II, Section 35-144O- Agricultural Buffers, Appendix H: Agricultural Buffer Implementation Guidelines and Santa Barbara County Right to Farm Ordinance).

Our position that high density urban development is not appropriate for rural agricultural areas along the City's edges is further supported by numerous adopted policies found in both the County's and City's respective certified LCPs, including but not limited to:

County Comprehensive Plan Agricultural Element Policy and California Coastal Act § 30241. The maximum amount of prime agricultural land shall be maintained in agricultural production to assure the protection of the areas' agricultural economy, and conflicts shall be minimized between agricultural and urban land uses through all of the following:

- By establishing stable boundaries separating urban and rural areas, including, where necessary, clearly defined buffer areas to minimize conflicts between agricultural and urban uses.
- By limiting conversions of agricultural lands around the periphery of urban areas
  to the lands where the viability of existing agricultural use is already severely
  limited by conflicts with urban uses or where the conversion of the lands would
  complete a logical and viable neighborhood and contribute to the establishment
  of a stable limit to urban development.
- By permitting the conversion of agricultural land surrounded by urban uses where the conversion of the land would be consistent with Section 30250.
- By developing available lands not suited for agriculture prior to the conversion of agricultural lands.
- By assuring that public service and facility expansions and non-agricultural development do not impair agricultural viability, either through increased assessment costs or degraded air and water quality.
- By assuring that all divisions of prime agricultural lands, except those conversions approved pursuant to subdivision (b) of this section, and all development adjacent to prime agricultural lands shall not diminish the productivity of such prime agricultural lands.

City Policy LU-3a: New development shall occur contiguous to existing developed areas of the city. Higher density in certain residential neighborhoods and for residential uses in commercial districts shall be provided as a means to concentrate development in the urban core consistent with zoning designations, particularly where redevelopment of existing structures is proposed.

California Coastal Act § 30250. (a) New residential, commercial, or industrial development, except as otherwise provided in this division, shall be located within, contiguous with, or in close proximity to, existing developed areas able to accommodate it or, where such areas are not able to accommodate it, in other areas with adequate public services and where it will not have significant adverse effects, either individually or cumulatively, on coastal resources.

Specifically, in the Carpinteria Valley, sites identified as the "Van Wingerden 1" potential rezone site and the "Bailard" pending housing project, should be eliminated because of impacts to coastal agricultural lands. Wise planning practices call for higher residential densities to occur within or immediately adjacent to the urban core. City and County land use policies and the Coastal Act support these practices. These two sites contradict this fundamental principle by proposing the highest densities found in the Carpinteria Valley at the very edge of the City, outside the urban-rural boundary, at significant distance from the urban core, with no immediate access to pedestrian, bicycle and public transit routes, and not within reasonable walking distance to grocery shopping and other necessities and conveniences of daily living.

We also do not believe that these sites have the potential to meet state regulations for conversion of agricultural land/use to residential use. The Coastal Act section 30242 expressly identifies that lands suitable for agricultural use shall not be converted to other uses unless continued agricultural use is not feasible or such conversion would preserve prime agricultural land or concentrate development within a developed area. Consistent with this Coastal Act policy, the City is closely scrutinizing potential rezones of agricultural lands within the City to avoid conversion of other agricultural land within the Carpinteria Valley and to concentrate residential development within its urban boundaries. However, the City Council firmly believes that the County and the Coastal Commission cannot make these findings for the Van Wingerden 1 and Bailard sites for the reasons stated above.

While the bar remains high for consideration of conversion of agricultural use and land, the City believes the "Van Wingerden 2" site may appropriately be considered given its location situated along a major transit route, its adjacency to existing urban development on two sides, and what appears to be adequate ingress/egress opportunity.

Lastly, we continue to urge the County to explore and identify additional potential sites for infill development opportunities throughout the unincorporated South County's urbanized and suburban areas. More specifically, the County should be identifying and prioritizing underutilized commercial, office, residential, and governmental properties within these urban areas rather than relying so heavily on "greenfield" development opportunities on agricultural lands outside of the urban-rural boundary. In addition to having a better chance for being found consistent with Coastal Act resource protection policies, such infill opportunities that are closer to job centers could have a more meaningful impact on achieving a regional jobshousing balance and reducing vehicle miles traveled, as encouraged by Draft County Housing Element Policy 1.3.

# Request for Policies and Programs aimed at preventing displacement and promoting affordable housing

We have a common interest in helping to ensure the availability of housing for workers in the agricultural, service and hospitality industries because these are important parts of the regional economy and wages are typically too low to keep pace with housing markets. Housing markets in attractive coastal areas, like Carpinteria, are heavily influenced by factors other than supply, such as demand for vacation rentals and second homes. These factors we expect will continue to contribute to escalating housing prices despite planned growth in supply.

As such, promoting growth and relying on development purported to be "affordable by design" will not be sufficient to meet the housing needs of the region. Government interventions will be required in order to provide housing that is available and that is affordable to many people that work in the City and in the Carpinteria Valley. We urge the County to join the City in developing measures to address this such as:

- Prioritize production of rental housing units over ownership units;
- Prioritize housing for agricultural and service workers;
- Adopt inclusionary requirements to achieve an amount of lower income rent restricted units significantly greater than provided for in state laws;
- Prohibit vacation rentals for multi-family residential housing built in the Carpinteria Valley, including prohibitions on corporate and limited liability company ownership models:
- Establish a vacancy tax and/or other measures to ensure second home use contributes to affordable housing development and preservation;
- Enact rent stabilization on multi-family rental housing; and
- Establish no-cause eviction prohibition regulations beyond state law requirements.

The City included each of the above measures in its Annual Work Plan and plans to incorporate these measures in our Housing Element to advance the City's evidence to prevent displacement of existing residents and provide affordable housing for South County essential workers. The County should incorporate similar measures in its Housing Element policies and programs to ensure that the County and City move forward collaboratively to advance truly affordable housing policies within the Carpinteria Valley.

Lastly, we are seeking a commitment from the County to collaborate with the City to determine appropriate mitigation for development impacts, (e.g., traffic, parks, etc.) that will occur in the City as a result of these higher residential densities occurring outside the City limits, and to require these to be addressed as a part of project development approval. Such mitigation is critical to ensure that new and existing development have access to the public resources that make south Santa Barbara County a desirable place to live and work.

Thank you in advance for your consideration of this request.

Sincerely,

Souncilmember Mónica J. Solórzano

Councilmember Wade T. Nomura

Councilmember Roy Lee

∕ice Mayor Natalia Alarcor

Mayor Al Clark

Cc: sbcob@countyofsb.org

### CITY of CARPINTERIA, CALIFORNIA



August 28, 2023

VIA EMAIL: HOUSINGELEMENT@COUNTYOFSB.ORG

Board of Supervisors County of Santa Barbara c/o Jessi Steele, Long Range Planning Division

Re: Santa Barbra County Draft 2023 - 2031 Housing Element Update

Dear Chair Williams and Honorable Members of the Board of Supervisors:

The City of Carpinteria (City) has been closely following the Santa Barbara County (County) Housing Element Update process. We appreciate the challenges faced by the County and other local jurisdictions, ourselves included, in crafting a Housing Element Update that satisfies our respective regional housing needs assessment (RHNA) allocations and meets the California Department of Housing and Community Development's (HCD) high bar for certification. We recognize the need for all areas of the County to share in meeting regional housing needs and that difficult decisions must be made concerning where and how to accommodate needed housing in a manner that affirmatively furthers fair housing.

The City Council submits this letter as a follow up to our February 28, 2023 letter (attached) wherein we requested modifications to the proposed housing sites in the Carpinteria Valley and a County commitment to implement policies and programs aimed at preventing displacement and promoting affordable housing. Since our last letter, we have been pleased to see the County move forward with the recent adoption of a just-cause residential eviction ordinance as an important step toward protecting tenants and helping to preserve the South County affordable rental housing stock.

We remain disheartened, however, to see that the County has not made changes to its inventory of potential rezone sites as requested by the City. Namely, the County still identifies the "Van Wingerden 1" potential rezone site and the "Bailard" pending housing project moving forward, despite the fact that these sites are inconsistent with the County's Comprehensive Plan Agricultural Element Policies, the County's Coastal Land Use Plan, and the California Coastal Act, which call for the preservation of coastal agricultural lands.

Wise planning practices call for higher residential densities to occur within or immediately adjacent to the urban core. County and City land use policies and the Coastal Act support these practices. Yet, the Van Wingerden 1 and Bailard sites contradict these fundamental principles by proposing the highest densities found in the Carpinteria Valley on agricultural lands at the very edge of the City, outside the urban-

rural boundary, at significant distance from the urban core, with no immediate access to pedestrian, bicycle and public transit routes, and not within reasonable walking distance to grocery shopping and other necessities and conveniences of daily living.

Again, we encourage the County to focus its Housing Element Update rezones on infill development sites located within existing urban and suburban areas throughout the South County. These infill development sites are more likely to be found consistent with California Coastal Act resource protection policies and will promote more desirable residential development near existing job centers and services.

Although the bar remains high to convert agricultural uses, the City believes that the "Van Wingerden 2" site may be an appropriate site to meet the goals of the Coastal Act and County Housing Element Policy 1.3. This site deserves continued consideration given its location along a major transit route, adjacent to existing urban development, and apparent adequate ingress/egress.

The City Council also wishes to address concerning comments regarding the proposed Bailard Avenue Multifamily Housing Project. At the February 2023 County Planning Commission Concept Review Hearing, comments were made indicating the developer intends to resubmit the project under an SB 330 Preliminary Application as a "Builder's Remedy" project pursuant to the Housing Accountability Act. Additional comments were made suggesting the inability of the County to deny or modify the project due to the invocation of the "Builder's Remedy" provisions.

The City asserts that these comments misstate the applicable law. Pursuant to Government Code section 65589.5, subdivision (e), nothing in the Housing Accountability Act, including the Builder's Remedy, relieves the County from complying with the California Coastal Act or the California Environmental Quality Act. Rather, the Housing Accountability Act, like other state housing laws, must be harmonized with the Coastal Act to the maximum extent feasible. The Bailard Avenue Multifamily Housing Project is located entirely within the coastal zone and thus subject to the County's certified Coastal Land Use Plan (CLUP) and Local Coastal Program (LCP). Therefore, the County must still apply any provisions of the County's CLUP and LCP to the Bailard Avenue Multifamily Housing Project. The City Council respectfully urges the County to acknowledge that it will process the Bailard Avenue Multifamily Housing Project consistent with its certified CLUP and LCP along with all applicable California Coastal Act policies and conduct a thorough environmental review under the California Environmental Quality Act.

The City Council requests that the County collaborate with the City as it moves forward with the rezoning of potential sites and consideration of proposed projects in the vicinity of the City. Collaboration with the City regarding appropriate mitigation measures for development impacts (e.g., traffic, parks, coastal resources, etc.) that will occur as a result of these high density residential projects is critical to ensure that new and existing development have access to the public resources that make the Carpinteria Valley a desirable place to live and work. These mitigation measures are necessary to ensure

that implementation of the County's Housing Element Update achieves the dual goals of affirmatively furthering fair housing and protecting coastal resources.

Thank you in advance for your consideration of this request.

Sincerely,

Councilmen ber Mónica J. Solórzano

Councilmember Wade T. Nomura

Councilmember Roy Lee

Vice Mayor Natalia Alarcon

Mayor Al Clark

Cc: County Clerk of the Board (<a href="mailto:sbcob@countyofsb.org">sbcob@countyofsb.org</a>)

Alia Vosburg, County Development Review Division (avosburg@countyofsb.org)
Barbara Carey, California Coastal Commission (barbara.carey@coastal.ca.gov)