

Rezone

Sarah Mayer Public Comment - Carpinteria Valley Association

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**From:** Mike Wondolowski <[mwondo@cox.net](mailto:mwondo@cox.net)>  
**Sent:** Wednesday, April 24, 2024 9:40 AM  
**To:** sbcob  
**Subject:** RE: UPDATE: Comments for May 1, 2024 Supervisors Hearing on Housing Element Update  
**Attachments:** CVA Comments on County HE Rezones 2023-04-23c.pdf

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I apologize, but I have one last revision to my comment letter. I hope it is not too late to replace my previous submission with the attached corrected (final!) file.

Thanks,  
Mike

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**From:** Mike Wondolowski <[mwondo@cox.net](mailto:mwondo@cox.net)>  
**Sent:** Tuesday, April 23, 2024 9:33 PM  
**To:** 'Clerk of the Board' <[sbcob@countyofsb.org](mailto:sbcob@countyofsb.org)>  
**Subject:** UPDATE: Comments for May 1, 2024 Supervisors Hearing on Housing Element Update

I noticed I had a typo in a date in the letter I just sent you. Please replace that letter with the attached corrected version.

Thanks!  
Mike

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**From:** Mike Wondolowski <[mwondo@cox.net](mailto:mwondo@cox.net)>  
**Sent:** Tuesday, April 23, 2024 9:14 PM  
**To:** 'Clerk of the Board' <[sbcob@countyofsb.org](mailto:sbcob@countyofsb.org)>  
**Subject:** Comments for May 1, 2024 Supervisors Hearing on Housing Element Update



# Carpinteria Valley Association

PO Box 27, Carpinteria, CA 93014

carpinteriavalleyassociation@gmail.com

*Protecting the beauty & natural resources of our valley since 1964*

Submitted via email to:  
sbcob@countyofsb.org

Apr 23, 2024

## Comments for:

**SB County Board of Supervisors Hearing of May 3, 2024  
Adoption of the 2023-2031 Housing Element Update Rezone Amendments**

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In this letter we submit comments from Carpinteria Valley Association regarding the Proposed Final Program EIR and the Rezone Amendments for the County of Santa Barbara 2023-2031 Housing Element Update.

## **SUMMARY OF OUR RECOMMENDATIONS:**

**We urge that the sites located in the Coastal Zone that are outside the Urban/Rural Boundary be eliminated from consideration for rezoning. This is Rezone Site 15 [Van Wingerden 1], Rezone Site 16 [Van Wingerden 2], and Pending Project Site 37 [Bailard].**

**Doing so will better adhere to good planning principles, and will eliminate likely objections from the Coastal Commission that would likely delay completion of the Housing Element Update, extending the window where further Builder's Remedy projects may come in.**

## **BACKGROUND:**

To provide context for our recommendations, we provide the following brief summary of certain events leading up to the publication of the proposed Final PEIR:

1. A meeting was arranged by Supervisor Das Williams and held on Dec 5, 2022 that included Supervisor Williams, County Planning & Development staff members, and a dozen or so Carpinteria community members. At that meeting, Supervisor Williams and the P&D staff members incorrectly stated that the Bailard site (the property now identified as Pending Project Site No. 37 [Bailard]) was located inside the County's mapped Urban/Rural Boundary. I stated that was not true and proved it by showing the P&D staff members the County's interactive map that clearly shows that the Bailard site is located outside the Urban/Rural Boundary. The P&D staff members agreed they had been in error.



2. On Jan 19, 2023, the Carpinteria Coastal View News newspaper published an interview with P&D Director Lisa Plowman (page 4) that quoted Director Plowman incorrectly stating the Bailard site is within the Urban/Rural Boundary. I emailed P&D pointing out the error and suggesting that Director Plowman contact the Coastal View News to have a correction printed. A correction was printed in the Jan 26, 2023 edition.
3. In the Draft PEIR for the County of Santa Barbara 2023-2031 Housing Element Update, in Table 3.10-4, at the top of page 3.10-59, the document incorrectly stated that all potential rezone sites are located outside the Coastal Zone and the jurisdiction of the CLUP. This is not true as multiple sites including both the Potential Rezone Site Nos. 15 [Van Wingerden 1] and 16 [Van Wingerden 2] are in the Coastal Zone and therefore subject to CLUP policies. In Comment Response O.1-2, this error is acknowledged, and there is a description of the updates made in the Proposed Final PEIR. However, the conclusion for the CLUP section of Table 3.10-4 remains "Potentially Consistent" where it seems it should be changed to "Potentially Inconsistent.". Additionally, it seems that since Pending Project Site No. 37 [Bailard] is included in the PEIR analysis, the fact that it is also in the Coastal Zone should be mentioned in Table 3.10-4, but it is not.
4. The Draft PEIR did not include analysis of the obvious "Non-Coastal Alternative" where only sites that are in the Coastal Zone and therefore subject to CLUP policies are excluded. Comment O.1-4 suggested such an alternative be analyzed, but the Comment Response correctly states that under CEQA, an EIR need not consider every conceivable alternative. However, just because something is not required does not mean it should not be done.

## **RATIONALE FOR OUR RECOMMENDATIONS:**

The sequence of errors by P&D staff documented in bullets numbered 1-3 above, followed by the decision not to show a "Non-Coastal Alternative" side-by-side with the other alternatives is unfortunate. The importance of the Urban/Rural Boundary and the protections of the California Coastal Act in the Coastal Zone are fundamental to good planning and have been critical in protecting the Carpinteria Valley for decades. Our goal is that this legacy of sound planning be continued.

After Comment Response O.1-4 states that analysis of another alternative is not required and therefore will not be done, the Response concludes with "these comments will be forwarded to County decision-makers for further consideration in the selection of rezone sites." The purpose of this letter is to highlight to County decision-makers these comments and the clear advantages of eliminating the Coastal Zone sites from consideration for rezoning.

### **Advantage #1: Adherence to good planning principles:**

The three Carpinteria Valley sites that are in the Coastal Zone (Potential Rezone Site 15 [Van Wingerden 1]) and 16 [Van Wingerden 2], and Pending Project Site 37 [Bailard]) are all also located outside the County's mapped Urban/Rural Boundary. In fact, they are the only sites in the entire County being analyzed in this PEIR that are outside the Urban/Rural Boundary.

The existing carefully-defined and stable Urban/Rural Boundary is an important planning tool for preventing sprawl and its associated problems. The purpose of the Urban/Rural boundary is to mark



the outer limit beyond which urban development will not be allowed. Its aim is to discourage sprawl by containing urban development.

It is unacceptable to expand this boundary solely because it is inconvenient and restricts where new high-density housing can be built. The whole point of County policy defining the Urban/Rural Boundary is to prevent development that is inappropriate in this location.

Section 3.8.2 of the County's Coastal Land Use Plan states: "Within the County's coastal zone, the need for clearly defined urban/rural boundaries is especially apparent on the South Coast, where prime coastal agriculture has given way to urban expansion in a rapidly developing area." That document continues with a description of how the Urban/Rural Boundary was determined for the purpose of preserving existing agricultural lands, not as a transitional land use but for agricultural use over the long term. Expanding the Urban/Rural Boundary now disregards existing County policy and sound planning principles.

**Advantage #2: Expediency in completing the Housing Element Update by avoiding the need for Coastal Commission approval of rezones in the Coastal Zone.**

Coastal Commission approval is required for rezones in the Coastal Zone. Rezoning sites that are outside the Urban/Rural Boundary and therefore expanding the Boundary is likely to be met with resistance (possibly significant resistance) from the Coastal Commission. Working through this is likely to delay completion of the Housing Element Update compared to completion of a Housing Element Update that does not include rezones that expand the Urban/Rural Boundary.

Any further delay to completion of the Housing Element Update extends the window where further Builder's Remedy projects may come in. That would be very undesirable.

**CONCLUSION:**

Therefore, we urge that the sites located in the Coastal Zone that are outside the Urban/Rural Boundary be eliminated from consideration for rezoning. This is Rezone Sites 15 [Van Wingerden 1] and 16 [Van Wingerden 2], and Pending Project Site No. 37 [Bailard]

Doing so will better adhere to good planning principles, and will eliminate likely objections from the Coastal Commission that would likely delay completion of the Housing Element Update, extending the window where further Builder's Remedy projects may come in.

Thank you,

Mike Wondolowski  
President  
Carpinteria Valley Association  
[carpinteriavalleyassociation@gmail.com](mailto:carpinteriavalleyassociation@gmail.com)