

June 6, 2006

Mayor Wallis and City Council Members
City of Goleta
Goleta City Hall
130 Cremona Drive, Suite B
Goleta, CA 93117

RE: Draft Goleta General Plan/Coastal Land Use Plan

Dear Mayor Wallis and Members of the Council:

The County Board of Supervisors has had the opportunity to review the City of Goleta's Draft General Plan/Coastal Land Use Plan and offers the following comments for your consideration in finalizing this important planning document. Detailed comments are also attached to this letter.

The south coast region faces significant planning challenges, including: providing housing for all segments of the community; balancing employment growth with housing; providing adequate transportation systems to accommodate local and commuting traveler's needs; and, providing for local and regional recreation and coastal access needs. These planning issues are not confined to existing political boundaries and cannot be solved by one single local jurisdiction alone. Instead, progress toward addressing these issues requires cooperation among the cities and county in the region. The City of Goleta's draft plan begins to acknowledge the regional nature of these planning issues by establishing a guiding principle/goal to "Influence future land use changes in nearby areas outside Goleta to avoid, lessen and/or mitigate impacts within the City."

The County Board of Supervisors respectfully requests that the Goleta City Council take this a step further by establishing guiding principles/goals that encourage cooperation among the south coast cities and County of Santa Barbara. Inter-jurisdictional planning can be used to guide the orderly and efficient extension of urban areas and related services and utilities; ensure the preservation of open space, agriculture and important resource lands; and, address housing needs, jobs-housing balance, transportation improvements and public parks and coastal access acquisitions and improvements. The reciprocal recognition of inter-jurisdictional impacts should also be reflected in Policy LU 12.

The Board of Supervisors looks forward to working with the Goleta City Council to provide the best solutions to important regional issues for the residents of the south coast and County as a whole.

Please feel free to contact Dianne Meester, Assistant Director of Planning and Development at (805) 568-2086 for clarification of any of the attached comments.

Sincerely,

Joni Gray, Chair
Santa Barbara County Board of Supervisors

ATTACHMENT A

SPECIFIC COMMENTS ON CITY OF GOLETA'S DRAFT GENERAL PLAN/COASTAL LAND USE PLAN

I. CHAPTER 1.0: INTRODUCTION AND OVERVIEW

- ***Section 1.3: Purpose and Organization of the Plan: Plan Structure***

The last paragraph in this section indicates that “The goals, objectives, and policies set forth in this document have full force and effect upon adoption of the Goleta General Plan/Coastal Land Use Plan.”

It is our understanding that inland portions of the General Plan and any subsequent amendments become effective 30 days after adoption, and that the LCP and any subsequent amendments become effective following certification by the Coastal Commission including subsequent acknowledgements between the City and Commission. Therefore, the first sentence of this paragraph should be revised accordingly.

- ***Section 1.5: Combined General Plan and Coastal Land Use Plan (GP/CP)***

The last paragraph in this section states that, “*Only those provisions that are designated (CP) and (GP/CP) are certified by the California Coastal Commission. Future amendments to these provisions will also be subject to certification by the commission.*” These sentences make it appear that the coastal portions of the plan have already been certified by the Coastal Commission. It is recommended that these sentences be revised to say, “*Only those provisions that are designated (CP) and (GP/CP) would require certification by the California Coastal Commission. Future amendments to these provisions would also be subject to certification by the commission.*”

II. CHAPTER 2.0: LAND USE ELEMENT

- ***Section 2.1: Introduction: Coastal Act Requirements***

The third sentence of this paragraph should recognize that agriculture is another priority coastal land use under the state Coastal Act, not just open space and recreation.

- ***Section 2.2: Guiding Principles and Goals (GP/CP)***

Item number 11 should also include a statement that it is the City's intent to permit land use changes in a manner that avoids, lessens, and/or mitigates adverse impacts outside the City's boundaries. This also applies to the objectives under Policy LU 12, p. 2-32.

- ***Policy LU 1.5: Retail and Other Commercial Centers***

The text of the policy states "new large regional commercial uses . . . shall be discouraged" It is recommended that the term "large regional commercial use" be defined in the Glossary.

- ***Policy 1.10: Multiple Use Development: Buildout Tables***

There should be some discussion of the relationship between residential and commercial-industrial buildout with regard to the City's and the region's jobs-housing balance, especially whether the existing imbalance (that is, insufficient housing in relation to jobs) might be improved or exacerbated. Also, the cited residential buildout of 3,730 new units is inconsistent with the residential buildout number of 3,531 units cited in HE 6.1 (p. 10-19).

- ***Policy LU 2: Table 2-1: Allowable Uses and Standards for Residential Use Categories***

In the Land Use Element Matrix of permitted land uses, as currently proposed, special needs homes are permitted with a conditional use permit only in high-density multifamily land use designations. County HCD recommends that special needs housing be allowed in all housing densities, or at least in low and mid density multifamily projects. It is the experience of the County that special need homes are located in all types of housing ranging from single family detached to multifamily complexes.

Mobile Home Parks: Government Code Section 65852.7, deems mobile home parks as a permitted land use on all land zoned for residential

land use as designated by the general plan, and this table should be revised accordingly.

Maximum Floor Area Ratios (R-MHP): It is assumed that “-1” is a typo and the appropriate FAR should be “1” or some other positive number.

- ***Policy LU 11: Nonresidential Growth Management (GP)***

The County supports the City’s efforts to curb unbalanced non-residential growth to ensure an appropriate jobs/housing balance. The County encourages the City to take actions to improve regional jobs/housing balance. This could include the establishment of quantified factors within the City’s growth management system that seek to achieve a better overall jobs-housing balance, by allowing more housing than only what may be needed to meet the incremental demand of new non-residential development. This intent could be stated explicitly under Policy LU 11, and carried forth in Implementation Action IA-2 on p. 2-39.

- ***Policy LU 12.1: City of Goleta Planning Area***

Subsection (e): The County acknowledges and appreciates the City’s commitment to notify all agencies and government entities of projects or actions that could potentially impact other agencies.

Subsection (g): The County is concerned that the City would oppose the creation of new private service systems for sewer and water service in rural areas north and west of Goleta. For example, the Santa Barbara Ranch (Naples) project west of Goleta is proposing one or more package wastewater treatment systems as an alternative to individual septic systems, in recognition of the large number of existing legal lots, local physical constraints on septic system performance, and the adverse water quality implications of a concentration of individual septic systems. The City’s policies should recognize that there may be circumstances where new private sewer and water systems may be preferable to other alternatives, especially in regard to providing services to development on existing legal lots. Also, if the City intends to oppose development and new service systems in certain areas, then the City should consider allowing such areas to transfer development credits to receiving sites within the City

(Land Use Element Implementation Action IA-6 and Housing Element Implementation Program IP-10F, which are further discussed below).

- ***Policy LU 12.2: City of Goleta Service Boundary/Potential Sphere of Influence***

This section specifies that “*Urban services such as water and sewerage systems should not be extended outside the land areas that are designated and zoned in 2005 for a density that necessitates such services*” and “*The City shall oppose the extension of water and sewerage services to encompass additional lands northward and westward of the City’s boundary.*”

It is recommended that this section be modified to provide some degree of flexibility for land use decisions in areas other than those currently zoned for high density development.

The decision to extend public water or sewer service should be based on environmental factors such as density and site constraints in addition to zoning and General Plan designations. Many areas west and north of the City’s boundaries are not conducive to the use of private water or sewage disposal systems due to poor water quality and yield, poor soils, steep slopes and other constraints. Under this policy, the development of these lots could be restricted, precluded or forced to use private water and septic systems under marginal conditions. Additionally, creation of lots smaller than one-acre or approval of residential second units on existing lots smaller than two acres would be restricted by State requirements in the Central Coast Water Quality Control (Basin) Plan if sewage disposal is limited to private onsite systems.

Development adjacent to existing urban services should be considered for extension of those services and planned as such. Land use decisions should not be based on the withholding of logical and appropriate utilities and should not encourage the proliferation of small, private water systems or septic systems in highly constrained areas.

- ***Policy LU 12.7: County Lands East and South of Goleta***

Subsection (g): As part of the 2003-2008 Housing Element Update process the County is proposing to extend the preservation of the

South Patterson Agricultural Area until 2017 (ten years from the adoption of the 2003-2008 Housing Element).

- ***Figure 2-4: Potential City of Goleta Service Areas***

The land use designations for future service areas are consistent with current County designations. Please be aware that a General Plan Amendment/Rezone has been filed for the Cavaletto property (069-100-057, -006, -051). The decision on this application is pending before the County.

- ***Section 2.5: Implementation Actions (GP): IA-6: Transfer of Development Rights Ordinance/Program***

The County supports the City's intention to enact procedure to allow Transfer of Development Rights (TDR), but further encourages the City to consider allowing for such transfers from parcels within the unincorporated area, especially the identified City of Goleta "Planning Area."

III. CHAPTER 3.0: OPEN SPACE ELEMENT

- ***Section 3.2: Guiding Principles and Goals***

The comments and goals state the importance of achieving a vision for facilities accessible to all members of the community. Coastal dependent recreation of the type provided by the County facility at Goleta Beach County Park, that is accessible to all members of the public at all ability levels, are not planned for within the City's jurisdiction. Goal number six mentions the provision of "convenient" public access, yet the described enhanced facilities in the plan, such as parking, restrooms, hard surface pathways, etc., seem to lack the proximity to the shoreline anywhere along the City's beach for all but the able bodied.

Goal number one mentions coordination with other agencies, yet nowhere in the plan is that coordination explored or further defined. Goleta Beach County Park is one of the most visited parks in our system, probably at capacity and undergoing a planning process that may result in reduced capacity over time. We would encourage the City to further explore its own potential for providing traditional

coastal park recreation for its citizens, as well as exploring coordinated actions with other agencies such as joint use agreements and MOU's to maintain and enhance current levels of convenient and accessible public access to the shore.

- ***Figure 3-1: Coastal Access Map***

This map does not indicate the links to the west or the east for trails, particularly the designated through state and national trails along California's Coast. The County's planning considers the California Coastal Trail and the Juan Bautista de Anza National Historical Trail as co-located and providing for multi-use (inclusive of a paved bikeway) and the City has chosen to separate these named trails. The Joint Ellwood-Devereux plan included this major trans-state trail as coming from the east on the UCSB West Campus property as a paved bikeway and natural surface recreation trail. The County's planning for the continuation of the Coastal/de Anza trail picks up the trail on the west at the end of the Bacara access road at the City's boundary and is proposed as a paved bikeway and natural surface recreation trail. The City's planning seems to lack coordination with these other plans.

The figure has a call-out at the two west end vertical access ways that reads "Proposed Drop-Off Only" yet this designation is not defined in the figure or in the text.

- ***Policy OS 1.4: Mitigation of Impacts to Lateral Coastal Access***

Policy states that "impacts may be mitigated through the dedication of an access and/or trail easement where the project site encompasses an existing or planned coastal accessway..." This does not appear to be consistent with other policies addressing lateral shoreline access. Consideration should be paid to revising the language to *prohibit* any development that would encroach into, obstruct or prevent the public right of use of an existing accessway. An attempt at such language is later provided in Policy OS 1.10 (e), but it should be included upfront in OS 1.4 inspecific relation to proposed development.

If Policy OS 1.4 was written as above because all City parcels with existing coastal accessways are constrained such that new development would need to be located encroaching into, or blocking,

the access, then the word “may” should be replaced with “shall” so that it reads “impacts shall be mitigated....”

- ***Policy OS 2.4: Mitigation of Impacts to Vertical Coastal Access***

Please see comments for Policy OS 1.4 – these comments apply equally to lateral and vertical access.

- ***Policy OS 2.5: Dedication of Vertical Accessways***

Subsection (a): This subsection states that the access easement “shall apply to an area that includes a public pathway that extends from the public road or parking area to the shoreline.” This language seems to limit dedication to those individual parcels that contain part or all of an existing complete accessway. The reality of acquiring access is one of piecemeal acquisition over time over multiple lots – the failure of a given existing path to reach a public road/parking area or conversely, the shoreline, should not preclude a requirement for dedication.

- ***Policy OS 2.7: Siting and Design of Vertical Accessways***

Subsection (b): The word “pervious” should be changed to “impervious” in this subsection.

- ***Policy OS 2.8: Management of Vertical Accessways***

Please see comments for Policy OS 1.10 – these comments apply equally to lateral and vertical access.

Subsection (a): The word “may” should be changed to “shall” in this subsection.

- ***Policy OS 3.2: Coastal Access Parking***

Subsection (b): This would allow displacement of existing public parking areas that already serve coastal access and recreation. If preservation of coastal access is a primary focus of the OSE, why would such displacement of parking be allowed? The criteria for such displacement should be clearly defined within the body of the policy if this is to be an allowable action.

Subsection (d): This subsection refers to development that may “cumulatively” impact access. You may wish to remove the word “cumulatively” to allow for consideration of project specific impacts.

- ***Policy OS 3.3: Signage for Coastal Access***

The wording indicates that signage “may” be provided. We would recommend that the word be changed to “shall” be provided. The public should be made well aware of the location and access points to the coast.

- ***Figure 3-2: Park and Recreation Plan Map***

This figure shows a proposed trail within the County jurisdiction area named the Ellwood Canyon Trail. This proposed trail does not exist in the County’s adopted plan. We also note that the Glen Annie Trail is shown continuing up to the National Forest. The proposed Glen Annie Trail ends with the end of the County road right-of-way and does not reach the National Forest. Please refer to the County’s adopted Parks, Recreation and Trails Map (PRT-3) revised and adopted May 16, 1995.

- ***Policy OS 4.1: Definition (Trails and Bikeways)***

The first sentence should add the following language (underlined) such that it reads “As set forth in this policy, trails are defined as foot paths where rights of public use currently exist and/or are obtained...”

- ***Policy OS 4.3: California Coastal Trail***

Subsection (a): This subsection refers to an appropriate setback from coastal bluffs for purposes of public safety. The use of a definable setback such as the 75-year bluff retreat setback may be helpful in this context.

- ***Policy OS 4.4: Juan Bautista de Anza National Historic Trail***

Subsection (e): Connectivity is recognized as provided for in the Ellwood-Devereux OSHMP, yet as stated above, Figure 3-1 does not recognize the connectivity of these trails either to the east or the west.

- ***Policy OS 4.5: Creekside Trails***

The word “should” in the fourth sentence, should be replaced with “shall”.

The word “should” in the fifth sentence should be replaced with “shall”.

- ***Policy OS 4.6: Trail Connectors to the National Forest***

The adopted County PRT-3 map does not include the Ellwood Canyon Trail as a proposed trail and does not provide for the proposed Gen Annie Trail or the San Jose Creek Trail as extending into the National Forest. However, a trail beginning from the end of Fairview Road is included as a proposed trail on the PRT-3 map called the Fremont/Slippery Rock Trail.

- ***Policy OS 5.3: Ellwood-Devereux Open Space Area; Public Access & Recreation***

Subsections (a) and (b): These subsections refer to the two major east-west trails planned as part of the OSHMP – the Anza Trail (AT) and the California Coastal Trail (CCT). Given that these trails formed a major part of the contiguous trail system affirmed in the joint OSHMP, definitive language should be used to support installation of these trails in the locations proposed. To this end, a phrase such as “shall be located as depicted...” should be added to subsection 5.3 (a) and the wording “is planned to ..” should be replaced with the word “shall” in subsection 5.3 (b).

The description of proposed public access parking in subsection (f) conflicts with the description of said parking in the joint OSHMP. The OSHMP states that the public parking lot adjacent to Hollister Avenue (Santa Barbara Shores) will provide a minimum of 40 spaces. Subsection (f) states that “not more than 45 parking spaces” shall be provided, but does not make any definitive statement regarding the minimum number of spaces. This text should be reconciled with the OSHMP language, to state that a minimum of 40 spaces shall be provided.

On-street public parking in the Ellwood area is discussed in subsection (f) 4. This policy does not make any reference to the potential future restriction of such on-street parking to residents as mentioned in Section 4.5 of the OSHMP. This issue needs to be clarified. If no such future restriction would be allowed, then language needs to be added that states that on-street public parking shall not be converted to non-public parking, and designate the streets/area to which the policy would apply. However, if such a future restriction is possible, then language needs to be added that states that in the event of such restriction, the City shall provide the same number of public parking spaces elsewhere for public coastal access.

Subsections (g) and (g) 1: These subsections refer to a “potential” public restroom facility as one of the facilities that “may” be provided within the boundaries of the open space area. This description conflicts with the description in the joint OSHMP (Sections 4.5 and 4.6) that states that a public restroom facility will be provided at the public parking lot adjacent to Hollister Avenue (see subsection 5.3 (f)). The text of these subsections should be changed to state that a public restroom facility shall be provided at the public parking lot adjacent to Hollister Ave (Santa Barbara Shores).

- ***Policy OS 5.5: Use and Management of the Open Space Area***

Subsection (g): The language in this subsection should be amended to specify that herbicide use within 100 feet of the top-of-bank of any watercourse within the open space area shall be restricted to those herbicides approved by the U.S. EPA for use in aquatic environments.

- ***Policy OS 6.6: Community Parks***

Subsection (c): This subsection states that onsite parking “may” be provided. The policy also states that these parks serve residents who will or may use automobiles for access. Given the contentiousness of on-street parking issues within established neighborhoods, the development standards for such parks should include the provision/construction of onsite parking facilities. To this end, replacing the word “may” with “shall” is recommended.

- ***Policy OS 6.7: Regional Open Space***

Please see comments on Policy OS 6.6 regarding parking – these comments apply equally to this policy.

- ***Policy OS 6.8: Special Use Parks***

Subsection (c): Similar to the two preceding policies, only states that onsite parking facilities “may” be provided. Given the description of such parks, it would seem that onsite parking would be required and that the development standards for such parks would state this. Again, replacing the word “may” with “shall” is recommended. This could be further refined by specifying that onsite parking shall be provided for any new special use park for which a traffic study showed that on-street parking would not be available for park users or would be negatively impacted by park users.

- ***Policy OS 6.10: Design and Management of Public Parks and Open Space***

Subsection (b): Language should be added so that herbicide use is restricted within 100 feet of the top-of-bank of any watercourse in parks and open space to those herbicides approved by the U.S. EPA for use in aquatic environments.

Subsection (f): Language should be added to state that lights shall not be directed upward or into any adjacent habitat.

- ***Policy OS 7.3: Open Space for Preservation of Natural Resources***

Subsection (b): The word “may” should be replaced with the word “shall”. This could be refined to restrict this to new development and not simple residential additions. The drafting of the OSE is a chance to eliminate ambiguity upfront with respect to what will be required as a condition of approval of new development.

IV. CHAPTER 4.0: CONSERVATION ELEMENT

- ***Section 4.1: Introduction***

Discussion in the Conservation Element should also discuss on-going Flood Maintenance that occurs in the City including ESHA and

wetland areas. The Flood Control District has an adopted EIR that addresses impacts associated with the work. The City should stress the need for continued level of service from the FCD.

V. CHAPTER 5.0: SAFETY ELEMENT

• *Figure 5-2: Fire, Flood, and Tsunami Hazards Map*

There are new flood maps effective September 30, 2006. This figure shows an old map and should be updated with the new map.

• *Section 5.4: City Policies*

Development should be required to raise two feet above the FEMA 100 year flood elevation, or if no FEMA flood elevation is present, then development should be elevated two feet above the City approved 100 year flood elevation.

VI. CHAPTER 7.0: TRANSPORTATION ELEMENT

• *Chapter 7.0: Generally*

The key intersections, such as the Patterson/Calle/Real/US 101 Ramps interchange, contain the consistent counts and resulting LOS figures when compared to County Public Works' counts. The Public Works Transportation Division had provided the Patterson/US 101 NB and SB ramps in the Preliminary Draft County 2004 GTIP as a courtesy, as these intersections, with the exception of Calle/Real/Patterson, are not within our jurisdiction. The Project Manager of the Transportation Division had previously discussed this area with concerned citizens some time ago and he feels it would be helpful to have the Patterson/US 101 Ramps information in our County GTIP as a public and inter-agency courtesy for the benefit of the community.

There is no mention whatsoever of Calle Real functioning as an east-west arterial. There is only a discussion of Cathedral Oaks, and Hollister Ave., and a brief statement on the future Phelps Road extension serving the east-west congestion issue in the future. Calle Real is a key facility serving the Calle Real Shopping Center, and many

other land developments, US 101, and intersects key collector streets within the city. The city should list Calle Real as an arterial facility, connecting many of their residential collector streets, serving a large number of their citizens.

There was also no mention of the Calle Real Extension project, which is one of the Transportation Division's key projects identified in both the 1999 and 2004 draft GTIP programming documents. There was no mention of the inter-agency coordination that will be required to plan, design, and construct this key connection, which crosses over into the city extending out across from the fire Station driveway (likely warranting a traffic signal at the connection point) to the west. Discussion of this should be incorporated into the City Transportation Element.

- ***Figure 7-5: Pedestrian System Plan***

This plan shows proposed trails at Ellwood Canyon, a portion of Glen Annie and at Los Carneros Creek within the County's jurisdiction that are not a part of County adopted plans to the National Forest.

- ***Figure 7-6: Bikeways Plan***

Same comment as in figure 7-5 above and we also note a notation on figure 7-6 "Future Access to National Forest" as erroneous on this plan as paved bikeways are not proposed into the National Forest. We also note that the bikeway proposed through UCSB West Campus, the continuation of the Coastal/de Anza trail is proposed as a Class 1 bikeway, not a Class 2 bikeway.

- ***Policy TE 14.5: Mitigation Fees by Projects in the County of Santa Barbara***

This policy states: "...provide the transfer of traffic impact fees collected by the County for projects that have impacts on city streets and roads." A mitigation agreement regarding payment of transportation impact fees towards inter-agency projects appears a more reasonable approach here. Certainly both agencies would benefit from such an agreement.

VII. CHAPTER 8.0: PUBLIC FACILITIES ELEMENT

- ***Policy PF 3.2: New Fire Station in Western Goleta***

It should be acknowledged that a new fire station in western Goleta should be sized and equipped to provide adequate emergency service to unincorporated areas immediately west of the City, as recognized by the County Fire Department in its comments on the Santa Barbara Ranch (Naples) project.

- ***Policy PF 4.2: Sewer Facilities and Services***

Subsections (c) & (d): The County commends and supports the City's efforts to increase the adequacy of wastewater treatment.

Subsection (j): "The City shall discourage and oppose extension of sewer service into any land area not designated for urban development, including to areas west of Goleta and the Embarcadero Community Services District." The County is concerned over this policy statement for the same reasons previously cited for LU 12.1(g). Also, the correct title for the existing district is the "Embarcadero Municipal Improvement District."

VIII. CHAPTER 10.0: HOUSING ELEMENT

- ***Policy HE 5: Special Needs Housing and Support Programs (GP)***

IP-5G: Farmworker Housing: This implementation plan recommends that farmworker housing may only allowed on-site. County HCD recommends that off-site farmworker housing also be allowed. The County recently conducted a farmworker survey and found that most farmworkers preferred to live in the city, closer to all the services.