

## Attachment-10

### Comprehensive Plan Consistency Discussion

The consistency analysis discussion below pertains to the project as a whole, including the Coastal Development Permit, Variance, General Plan Amendment and Rezone.

REQUIREMENT	DISCUSSION
<b>Services</b>	
<p><b>Coastal Plan Policy 2-6:</b> Prior to issuance of a development permit, the County shall make the finding, based on information provided by environmental documents, staff analysis, and the applicant, that adequate public or private services and resources (i.e., water, sewer, roads, etc.) are available to serve the proposed development. The applicant shall assume full responsibility for costs incurred in service extensions or improvements that are required as a result of the proposed project. Lack of available public or private services or resources shall be grounds for denial of the project or reduction in the density otherwise indicated in the land use plan. Where an affordable housing project is proposed pursuant to the Affordable Housing Overlay regulations, special needs housing or other affordable housing projects which include at least 50% of the total number of units for affordable housing or 30% of the total number of units affordable at the very low income level are to be served by entities that require can-and-will-serve letters, such projects shall be presumed to be consistent with the water and sewer service requirements of this policy if the project has, or is conditioned to obtain all necessary can-and-will-serve letters at the time of final map recordation, or if no map, prior to</p>	<p><b>Consistent:</b> Water service for the site would be provided by the Montecito Water District. The Montecito Water District provided a Certificate of Water Service Availability dated August 14, 2015 and an existing waterline located within an existing easement provides water service to the site. Sanitary service would be provided by the Summerland Sanitary District. The Summerland Sanitary District provided a “Sewer Service Availability” letter dated July 31, 2017. The letter specifies that the property owner is responsible for complying with all District requirements for a connection permit. Condition 20 (Attachment-6 to this Board letter) requires that prior to issuance of the Coastal Development Permit, the applicant update the project site plan to indicate the location of the proposed sewer line and sewer line easement and provide written confirmation from the Summerland Sanitary District that the updated plans and project have complied with all District requirements for connection. Pursuant to the applicant, access is provided by an unnamed access road via Wallace Avenue. Historic documents pertaining to the unnamed access road are included as Attachments 16 and 17 of Attachment-15 (Board Agenda Letter</p>

<p>issuance of land use permits.</p>	<p>dated November 13, 2015) to the Board letter dated January 9, 2018. Fire Service would be provided by the Carpinteria-Summerland Fire District and police services would be provided by the County Sherriff.</p> <p>With regard to the General Plan Amendment and Rezone request (GPA/RZN), it would be consistent with applicable policies and with the general community welfare to allow conversion of property from recreational to residential where adequate services are available to serve the proposed residential site, as discussed above.</p>
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**Geologic Processes**

<p><b>Coastal Plan Policy 3-4:</b> In areas of new development, above-ground structures shall be set back a sufficient distance from the bluff edge to be safe from the threat of bluff erosion for a minimum of 75 years, unless such standard will make a lot unbuildable, in which case a standard of 50 years shall be used. The County shall determine the required setback. A geologic report shall be required by the County in order to make this determination.</p> <p><b>Coastal Plan Policy 3-5:</b> Within the required blufftop setback, drought-tolerant vegetation shall be maintained. Grading, as may be required to establish property drainage or to install landscaping, and minor improvements, i.e., patios and fences that do not impact bluff stability, may be permitted. Surface water shall be directed away from the top of the bluff or be handled in a manner satisfactory to prevent damage to the bluff by surface and</p>	<p><b>Consistent:</b> The retreat rate for the coastal bluff adjacent to the subject property has been estimated at an average of 0.36 feet per year (Evaluation of Bluff Stability and Seacliff Retreat, Michael Hoover, January 6, 2012). Over 75 years, this retreat rate results in a setback of 27 feet. However, a 27 foot setback would result in an only 27 by 55 foot (1,485 square foot) area within which a home could be built, and a 27 foot bluff setback would extend to the middle of the proposed structure making the proposed residence unbuildable. In addition, the project geologist has commented that the toe of the bluff adjacent to the subject property has greater protection than other seacliffs within the area. Specifically, fill material at the bluff base (placed in 2001) contains <i>“concrete and boulders that protect the toe of the slope from wave attack to a greater degree than most undisturbed (natural) sea cliffs in this area”</i> (Response to</p>
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<p>percolating water.</p> <p><b>Coastal Plan Policy 3-6:</b> Development and activity of any kind beyond the required blufftop setback shall be constructed to insure that all surface and subsurface drainage shall not contribute to the erosion of the bluff face or the stability of the bluff itself.</p> <p><b>Coastal Plan Policy 3-7:</b> No development shall be permitted on the bluff face, except for engineered staircases or accessways to provide beach access, and pipelines for scientific research or coastal dependent industry. Drainpipes shall be allowed only where no other less environmentally damaging drain system is feasible and the drainpipes are designed and placed to minimize impacts to the bluff face, toe, and beach. Drainage devices extending over the bluff face shall not be permitted if the property can be drained away from the bluff face.</p> <p><b>Summerland Community Plan Policy GEO-S-3:</b> All new development on ocean bluff-top property shall be carefully designed to minimize erosion and sea cliff retreat and to avoid the need for shoreline protection devices in the future.</p> <p><b>Summerland Community Plan Action GEO-S-3.1:</b> The County shall require all development proposed to be located on ocean bluff top property to perform a site specific analysis, prior to project review and approval, by a registered or certified geologist to determine the extent of the hazards (including</p>	<p>Comments, Michael Hoover, July 28, 2016). Therefore, a standard of 50 years has been used, resulting in a required blufftop setback of 18 feet. The proposed project would be setback 24 feet from the bluff edge and would therefore meet the 18 foot/50 year setback. No development is proposed on the bluff face and all proposed vegetation within the blufftop setback is drought tolerant. The proposed grading and drainage plan shows that drainage would be directed away from the bluff face and to an on-site trench drain where it would infiltrate on-site.</p> <p>In addition to the bluff stability analysis discussed above, a "Coastal Hazard &amp; Wave Runup Study," was prepared by GeoSoils, Inc. (2016) to analyze the effects of sea-level rise and wave run-up on the subject property. The study found that wave run-up will not reach the structure even under the highest level sea-level rise estimate at 75 years. In addition, the project has been conditioned (condition 4) to comply with the requirements of the project geologist.</p> <p>With regard to the General Plan Amendment and Rezone request (GPA/RZN), it would be consistent with applicable policies and with the general community welfare for development on a proposed residential lot to be sited and designed in a manner consistent with geologic protection policies. Consistency with applicable geologic policies is discussed in greater detail above.</p>
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<p>bluff retreat) on the project site.          Recommendations indicated in the analysis required by RMD shall be implemented.</p>	
<p><b>Noise</b></p>	
<p><b>Summerland Community Plan Policy N-S-1:</b>          Interior noise-sensitive uses (i.e., residential and lodging facilities, educational facilities, public meeting places and others specified in the Noise Element) shall be protected to minimize significant noise impacts.</p> <p><b>Summerland Community Plan Action N-S-1.2:</b> For discretionary projects meeting the definition of a noise sensitive land use as defined in the Noise Element of the Santa Barbara Comprehensive Plan (Page 58) and which: 1) is located between U.S. Highway 101 on the south and the east-west line defined by Golden Gate Avenue to the north, or 2) is located south of U.S Highway 101, shall be subject to an acoustic evaluation. The evaluation should include a study of the ambient noise level, determination of the CNEL at the site and an analysis of the architectural design requirements to ensure compliance with the County of Santa Barbara Noise Threshold Criteria for indoor areas in the DER Thresholds Manual. Where feasible and desirable, design shall also consider noise levels for outdoor living areas. The evaluation should be prepared by a professionally registered engineer with a specialty in environmental acoustics.</p>	<p><b>Consistent:</b> The subject property is located adjacent to Highway 101 and UPRR on the north and the Pacific Ocean on the south. A noise study was prepared for the proposed project (Matthew McDuffee, Acentech, May 15, 2009). The study found that noise levels would have the potential to exceed the County threshold of 65 dB(A) exterior/45 dB(A) interior. The study found noise levels of 67 Ldn dB(A) on-site and states, <i>“the reason that the noise level exceeds the criteria is because of the sound level contribution from the waves on the Pacific Ocean.”</i> In order to reduce interior noise to levels to acceptable limits, the study provides recommendations for the use of “sound-proof” windows. Exterior use areas south of the proposed residence are buffered by the house to reduce exterior noise from HWY 101 and UPRR. Exterior use areas are not proposed between the house and railroad tracks. The study identifies that while the ocean is a primary contributing factor to noise levels on-site, the sound <i>“emanating from the ocean [is] a pleasant addition to the property’s atmosphere.”</i> Condition 6 requires compliance with the recommendations of the noise study. With incorporation of this condition, the project would be consistent with applicable noise policies.</p> <p>With regard to the General Plan Amendment and Rezone request (GPA/RZN), it would be</p>

	<p>consistent with applicable policies and general community welfare to allow conversion of property from recreational to residential where feasible design measures can be implemented to reduce noise exposure to acceptable limits. Consistency with applicable geologic policies is discussed in greater detail above.</p>
<p><b>Recreation</b></p>	
<p><b>Coastal Plan Policy 7-9:</b> Additional opportunities for coastal access and recreation shall be provided in the Summerland planning area. Parking, picnic tables, bike racks, and restrooms shall be provided where appropriate.</p> <p><b>Coastal Plan Policy 7-9 Implementing Action (a):</b> The County shall acquire the beach and bluff area south of Wallace Avenue. The parking area shall be landscaped, and measures taken to minimize further erosion along the bluffs and railroad embankment. Paths to the parking area shall be well defined.</p> <p><b>Coastal Act Policy 30222:</b> The use of private lands suitable for visitor-serving commercial recreation facilities designed to enhance public opportunities for coastal recreation shall have priority over private residential, general industrial, or general commercial development, but not over agriculture or coastal-dependent industry.</p>	<p><b>Consistent:</b> While the current land use and zoning of the lot designate it for recreation, its small size (a total of 4,356 square feet), conflicting surrounding zoning and land uses (“Transportation Corridor” and UPRR tracks), as well as its isolation from the beach by a steep coastal bluff, limit the recreational opportunities for the lot. In addition, Lookout Park, located approximately .45 miles from the subject property, currently provides beach access (including walkable access along the beach to the area below the subject lot) parking, picnic tables, restrooms, and children’s playground amenities. Because the property is not well-suited to recreational development and because existing nearby facilities already provide recreational amenities, the project site does not warrant visitor-serving commercial recreational use as a priority over private residential development in the manner envisioned by Coastal Act Policy 30222.</p> <p>With regard to the General Plan Amendment and Rezone request (GPA/RZN), it would be consistent with applicable recreation policies and in the interest of general community welfare to allow continued residential use of a</p>

	<p>privately owned property (via approval of GPA and RZN), particularly when the property is not well-suited for recreational use (as discussed above).</p>
<p><b>Visual Resources</b></p>	
<p><b>Coastal Act Policy 30251:</b> The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas.</p> <p><b>Coastal Plan Policy 4-9:</b> Structures shall be sited and designed to preserve unobstructed broad views of the ocean from Highway #101, and shall be clustered to the maximum extent feasible.</p> <p><b>Coastal Plan Policy 4-5:</b> In addition to that required for safety, further bluff setbacks may be required for oceanfront structures to minimize or avoid impacts on public views from the beach. Bluff top structures shall be set back from the bluff edge sufficiently far to insure that the structure does not infringe on views from the beach except in areas where existing structures on both sides of the proposed structure already impact public views from the beach. In such cases, the new structure shall be located no closer to the bluff's edge than the adjacent structures.</p>	<p><b>Consistent:</b> The site is located within an approximately 4,000 foot long stretch of Highway 101 containing, for the most part, broad unobstructed ocean views, and is within a view corridor overlay. The project (including the General Plan Amendment, Rezone, Coastal Development Permit and Variance) are located on a property that is notable due to its existing mature trees and shrubs and is visible from Lillie Ave. (Lillie Ave, bike trail, sidewalk), Greenwell Ave. at Lillie, and from Highway 101 North and South. From these vantage points, the proposed two-story residence would partially block views of the ocean as evidenced by its current partially constructed state. However, the proposed residence is only 55 feet in length, which is approximately 1% of the 4,000 foot long public ocean viewing area along this stretch of highway. In addition, the residence would be framed and partially obstructed by the existing mature trees and shrubs located on-site that already create a brief view blockage of the ocean as seen from the highway. The residence would not block public views up and down the beach and, given the height of the bluff which already dominates views north, would not block mountain views from the beach. Finally, the South Board of Architectural Review (BAR) indicated that they “[Accept] the height as proposed in exceedence of view corridor height limitations</p>

<p><b>Summerland Community Plan Policy VIS-S-3:</b> Public views from Summerland to the ocean and from the Highway to the foothills shall be protected and enhanced.</p>	<p>for good design,” and that the project “will add to the character of the area.” Please see Attachment-12 to the Board Letter dated January 9, 2018 for the full BAR meeting minutes.</p>
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