

**CALIFORNIA COASTAL COMMISSION**

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# Th11a

**DATE:** October 16, 2025

**TO:** Commissioners and Interested Persons

**FROM:** Steve Hudson, District Director  
Barbara Carey, District Manager  
Denise Gonzalez, District Supervisor

**SUBJECT:** County of Santa Barbara Local Coastal Program Amendment No. LCP-4-STB-24-0028-1-Part B (Housing Element Update/Rezoning) for November 6, 2025 Commission Meeting

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## SUMMARY OF STAFF RECOMMENDATION

The County of Santa Barbara is requesting an amendment to the Land Use Plan (LUP) and Implementation Plan/Coastal Zoning Ordinance (IP/CZO) portions of its certified Local Coastal Program (LCP) to rezone sites and amend various sections of the IP/CZO to comply with the County's Housing Element Update, including the establishment of a new Design Residential (DR) zone designation with minimum and maximum densities, the rezoning of four sites to the new DR zone district, and the establishment of ministerial permit requirements and development standards for projects qualifying for "By Right" processing pursuant to state law. Staff recommends that the Commission, after public hearing, approve the proposed LUP amendment as submitted. The proposed LUP amendment is consistent with and meets the requirements of the policies of Chapter 3 of the Coastal Act. Commission staff further recommends that the Commission deny the proposed IP/CZO amendment as submitted and approve the proposed IP/CZO amendment with three suggested modifications. The suggested modifications are necessary to ensure that the proposed IP/CZO amendment conforms with, and is adequate to carry out, the provisions of the certified LUP, as amended. The motions to accomplish these recommendations are found on Pages 6-8 of this staff report.

The County is requesting an amendment to change the land use designations for two sites, Van Wingerden 1 and Van Wingerden 2 (Assessor's Parcel Numbers [APNs] 004-013-023 and 004-005-001, respectively), from Agricultural I-5 and Agricultural I-10, respectively, to Residential 20/30 (Residential at 20 minimum/30 maximum dwelling units per acre). The amendment further proposes to change the land use designation of one site that is comprised of two parcels, Bailard ([APNs] 001-080-045 and 001-080-046), from Single Family Residential (3-E-1) to Residential 20 (20 maximum dwelling units per acre). These three sites are located within the Carpinteria Valley, adjoin the city limits of Carpinteria, and are adjacent to other AG-designated lands and residential/urban development. Additionally, these sites are contiguous with the urban/rural boundary. The fourth site proposed for a

land use designation change is the University of California, Santa Barbara-owned Friendship Manor (Assessor Parcel Number 075-020-035), from Residential at 20 to Residential 30/40 (with a minimum of 30 and a maximum of 40 dwelling units per acre). The site is an infill site within a designated urban area, located in the high-density and largely developed Isla Vista area.

The County is proposing land use designation changes to these four sites to accommodate its RHNA shortfall during the County's 2023-2031 Housing Element Update planning period. The proposed amendment raises the issue of whether converting agricultural lands to residential use is consistent with the Chapter 3 policies of the Coastal Act. The Coastal Act allows the conversion of agricultural land to non-agricultural uses only in very limited situations. According to Coastal Act Section 30241, this can occur around the periphery of urban areas only if agricultural viability is severely limited or where conversion would complete a logical boundary and contribute to a stable limit to urban development.

Van Wingerden 1 is adjacent to agricultural lands to the north and is surrounded on three sides by urban development, including commercial, religious, and multifamily development to the south, west, and a single-family residential tract to the east. Currently, the site creates a gap in the continuity of residential uses to the east and west. Incorporating this site into the Urban Area would create a more defined and consistent boundary between agricultural lands to the north and the urban development to the south. Van Wingerden 2 is surrounded on three sides by urban development, including the Carpinteria High School and single-family residential tracts, and borders agricultural land developed with greenhouses to the west and south. The site forms part of a "finger" peninsula that extends into the urban area. This configuration of the urban-rural boundary has resulted in conflicts (i.e., subject to State-mandated reporting requirements and restrictions on the types of pesticides utilized on the site) between the agricultural operations and the surrounding urban uses. Incorporating this site into the urban area would eliminate most of this "finger" and create a more consistent boundary between agricultural uses to the west and urban development to the south and east, thereby establishing a more stable urban-rural boundary. Both these land use changes would help establish a more stable urban-rural boundary and provide a clear limit to urban expansion, and would encourage residential development near existing urban areas, thus avoiding leapfrog development into neighboring agricultural lands. As such, the proposed amendment to convert two sites from agricultural to residential use around the periphery of urban areas would complete a logical boundary and contribute to a stable limit to urban development. Therefore, the Commission finds that the proposed Van Wingerden 1 and Van Wingerden 2 land use redesignations, as submitted, are consistent with and adequate to carry out the provisions of Coastal Act Section 30241.

Furthermore, the proposed sites for conversion are located adjacent to urban areas and are adjacent to essential public infrastructure, including water and sewer systems. According to County staff, Van Wingerden 1 and 2, and Bailard, will receive services from the Carpinteria Valley Water District and the Carpinteria Sanitary District. Both districts have confirmed that they have sufficient capacity to provide public water and sewer services for these locations. Moreover, the County's certified LCP includes policies and provisions designed to protect coastal resources. Any residential development proposed for these sites will be required to obtain a coastal development permit, and any new development will need to be found

consistent with the coastal resource protection policies outlined in the County's LCP.

To facilitate the development of high-density residential development on the subject sites, the LUP amendment includes the redesignation of the Van Wingerden 1, Van Wingerden 2, Bailard, and an adjacent parcel west of Bailard (APN 001-080-009) from Rural to Urban Areas. Specifically, the Bailard site is currently developed with four residences, accessory structures, and approximately 3 acres of seasonal row crops, and is surrounded by multi-family dwellings to the south, a public park to the east (Monte Vista Park), single-family dwellings and orchards to the west and east, and agricultural lands to the north. Developers of the Bailard site have also partnered with the County's Housing Authority, who have a pending application with the County for a multi-family housing project on the site. Realignment of the urban-rural boundary to bring Bailard into the urban area to allow high-density multifamily development, and adjacent to existing multi-family development to the south, would be an intensification of the existing use rather than a conversion of one use to another. Therefore, bringing this site into the urban area would maintain a stable urban-rural boundary. Additionally, this alignment would ensure the agricultural viability of existing agricultural operations will not be significantly impacted when future housing development is developed on these sites, while allowing for reasonable growth within urban areas through infilling and logical expansion outward, consistent with Section 30241 of the Coastal Act.

Lastly, the proposed IP/CZO introduces a new Section 35-144Z (Use By Right, Housing Element) to facilitate the future development of affordable housing projects on the four designated sites that have been rezoned. The proposed section, when applied, will enable the "by-right" development of multi-family residential housing at specified densities and require that at least 20 percent of units be affordable to very low- and/or low-income households. Commission staff coordinated with the County and property owners of the Bailard and Van Wingerden sites to increase the minimum percentage of affordable housing units from 20% to 32% of the total units. The first 20% must be allocated to very low or low-income households, while the additional 12% can include moderately priced units. This change will significantly increase the number of affordable units available.

**Suggested Modification Three** memorializes the agreed-upon affordability requirements for these housing projects by ensuring a total of 32% of units are affordable. The remaining suggested modifications are necessary clarifications to IP/CZO text that further the intent and implementation of the LCP, ensure internal consistency, and avoid ambiguity.

For the reasons described in this report, staff recommends that the Commission find that the proposed LUP amendment is consistent with and meets the requirements of the policies of Chapter 3 of the Coastal Act, and find the proposed LIP amendment, only if modified as suggested, is consistent with and adequate to carry out the applicable policies of the certified LUP as amended. The suggested modifications were developed in cooperation with County staff and the property owners of the Bailard and Van Wingerden 1 and 2 sites, and County staff and property owners have indicated that they are supportive of the suggested modifications.

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### Exhibits

[Exhibit 1 – SB County Resolution No 24-93 containing the Proposed LUP Amendment Text](#)

[Exhibit 2 – SB County Ordinance No 5209 containing the Proposed CZO Amendment Text](#)

[Exhibit 3 – SB County Ordinance No 5208 containing the Proposed CZO Amendment Zoning Map](#)

[Exhibit 4 – Carpinteria Valley Proposed Rezoning Aerial Overview](#)

[Exhibit 5 – Van Wingerden 1 Proposed Rezone Aerial](#)

[Exhibit 6 – Van Wingerden 2 Proposed Rezone Aerial](#)

[Exhibit 7 – Bailard Proposed Rezone Aerial](#)

[Exhibit 8 – Friendship Manor Proposed Rezone Aerial](#)

## **I. PROCEDURAL OVERVIEW**

### **A. Standard of Review**

The Coastal Act provides:

The Commission shall certify a land use plan, or any amendments thereto, if it finds that a land use plan meets the requirements of, and is in conformity with, the policies of Chapter 3 (commencing with Section 30200)...(Section 30512(c))

The local government shall submit to the Commission the zoning ordinances, zoning district maps, and, where necessary, other implementing actions that are required pursuant to this chapter. (Section 30513)

...The Commission may only reject ordinances, zoning district maps, or other implementing action on the grounds that they do not conform with, or are inadequate to carry out, the provisions of the certified land use plan. If the Commission rejects the zoning ordinances, zoning district maps, or other implementing actions, it shall give written notice of the rejection, specifying the provisions of the land use plan with which the rejected zoning ordinances do not conform, or which it finds will not be adequately carried out, together with its reasons for the action taken. (Section 30513)

The Commission may suggest modifications... (Section 30513)

Any proposed amendments to a certified local coastal program shall be submitted to, and processed by, the commission in accordance with the applicable procedures and time limits specified in Sections 30512 and 30513... (Section 30514(b))

Pursuant to Section 30512(c), the standard of review that the Commission utilizes in reviewing the adequacy of the proposed amendment to the County's certified LUP is whether the proposed amendment is consistent with the policies of Chapter 3 of the Coastal Act. The standard of review for the proposed amendment to the County's certified IP/CZO, pursuant to Sections 30513 and 30514(b) of the Coastal Act, is whether the proposed amendment is in conformance with, and adequate to carry out, the provisions of the Land Use Plan (LUP) portion of the County's certified LCP. All Chapter 3 policies of the Coastal Act have been incorporated in their entirety in the certified County of Santa Barbara LUP as guiding policies pursuant to Policy 1-1 of the LUP.

### **B. Procedural Requirements**

If the Commission certifies the LCP amendment as submitted, no further Board of Supervisors action will be necessary pursuant to Section 13544(b)(2) of Title 14 of the California Code of Regulations. Should the Commission deny the LCP Amendment, as submitted, without suggested modifications, no further action is required by either the Commission or the Board of Supervisors, and the LCP amendment is not effective, pursuant to Section 13542(f). Should the Commission deny the LCP Amendment, as

submitted, but then approve it with suggested modifications, then the Board of Supervisors may consider accepting the suggested modifications and submitting them by resolution to the Executive Director for a determination that the Board of Supervisors' acceptance is consistent with the Commission's action. In that scenario, pursuant to Section 13544(c) of Title 14 of the California Code of Regulations, the modified LCP Amendment will become final at the subsequent Commission meeting when staff provides notice of the Executive Director's Determination that the Board of Supervisors' action in accepting the suggested modifications approved by the Commission for this LCP Amendment is legally adequate. If the Board of Supervisors does not accept the suggested modifications within six months of the Commission's action, then the LCP amendment remains uncertified and not effective.

### **C. Public Participation**

Section 30503 of the Coastal Act requires the provision of maximum opportunities for public input in preparation, approval, certification and amendment of any LCP. The County held a series of public hearings on this amendment. The hearings were duly noticed consistent with the provisions of Section 13515 of Title 14 of the California Code of Regulations. Notice of the Coastal Commission's consideration of the subject amendment has been distributed to all known interested parties.

## **II. STAFF RECOMMENDATION, MOTIONS, AND RESOLUTIONS FOR THE COASTAL LAND USE PLAN AMENDMENT**

Following public hearing, staff recommends the Commission adopt the following resolutions and findings. The appropriate motion to introduce each resolution and a staff recommendation is provided.

### **A. APPROVAL OF THE COASTAL LAND USE PLAN AMENDMENT AS SUBMITTED**

#### MOTION I:

**I move that the Commission certify Land Use Plan Amendment No. LCP-4-STB-24-0028-1-Part B as submitted.**

#### STAFF RECOMMENDATION TO CERTIFY:

Staff recommends a **YES** vote. Passage of this motion will result in certification of the Land Use Plan Amendment as submitted and adoption of the following resolution and findings. The motion passes only by an affirmative vote of a majority of the appointed Commissioners.

#### RESOLUTION TO CERTIFY THE LAND USE PLAN AMENDMENT:

The Commission hereby certifies the Land Use Plan Amendment No. LCP-4-STB-24-0028-

1-Part B as submitted by the County of Santa Barbara, and adopts the findings set forth below on grounds that the amendment conforms with the policies of Chapter 3 of the Coastal Act. Certification of the Land Use Plan amendment complies with the California Environmental Quality Act because either 1) feasible mitigation measure and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the plan on the environment, or 2) there are no further feasible alternatives or mitigation measures which could substantially lessen any significant adverse impact which the Land Use Plan amendment may have on the environment.

### **III. STAFF RECOMMENDATION, MOTIONS, AND RESOLUTIONS FOR THE IMPLEMENTATION PLAN/COASTAL ZONING ORDINANCE (IP/CZO) AMENDMENT**

Following public hearing, staff recommends the Commission adopt the following resolutions and findings. The appropriate motion to introduce each resolution and a staff recommendation is provided.

#### **A. DENIAL OF THE IMPLEMENTATION PLAN/COASTAL ZONING ORDINANCE AMENDMENT AS SUBMITTED**

##### MOTION I:

**I move that the Commission reject County of Santa Barbara Implementation Plan/Coastal Zoning Ordinance Amendment No. LCP-4-STB-24-0028-1-Part B as submitted.**

##### STAFF RECOMMENDATION OF REJECTION:

Staff recommends a **YES** vote. Passage of this motion will result in denial of the Implementation Plan/Coastal Zoning Ordinance Amendment as submitted and adoption of the following resolution and findings. The motion passes only by an affirmative vote of a majority of the Commissioners present.

##### RESOLUTION TO DENY AS SUBMITTED:

The Commission hereby **denies** certification of the Implementation Plan/Coastal Zoning Ordinance Amendment No. LCP-4-STB-24-0028-1-Part B as submitted by the County of Santa Barbara, and adopts the findings set forth below on grounds that the Implementation Plan Amendment, as submitted, does not conform with, and is inadequate to carry out, the provisions of the certified Land Use Plan. Certification of the Implementation Plan amendment would not meet the requirements of the California Environmental Quality Act, as there are feasible alternatives and mitigation measures that would substantially lessen the significant adverse impacts on the environment that will result from certification of the Implementation Plan Amendment as submitted.

## **B. CERTIFICATION OF THE IMPLEMENTATION PLAN/COASTAL ZONING ORDINANCE AMENDMENT IF MODIFIED**

### MOTION II:

**I move that the Commission certify County of Santa Barbara Implementation Plan/Coastal Zoning Ordinance Amendment No. LCP-4-STB-24-0028-1-Part B if it is modified as suggested in this staff report.**

### STAFF RECOMMENDATION TO CERTIFY WITH SUGGESTED MODIFICATIONS:

Staff recommends a **YES** vote. Passage of this motion will result in certification of the amendment with suggested modifications and adoption of the following resolution and findings. The motion passes only by an affirmative vote of a majority of the Commissioners present.

### RESOLUTION TO CERTIFY WITH SUGGESTED MODIFICATIONS:

The Commission hereby **certifies** the County of Santa Barbara Implementation Plan\Coastal Zoning Ordinance Amendment No. LCP-4-STB-24-0028-1-Part B, if modified as suggested, and adopts the findings set forth below on grounds that the Implementation Plan Amendment with the suggested modifications conforms with, and is adequate to carry out, the provisions of the certified Land Use Plan. Certification of the Implementation Plan Amendment, if modified as suggested, complies with the California Environmental Quality Act, because either 1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the Implementation Plan Amendment on the environment, or 2) there are no further feasible alternatives or mitigation measures that would substantially lessen any significant adverse impacts which the land use plan amendment may have on the environment.

## **IV. SUGGESTED MODIFICATIONS ON THE IMPLEMENTATION PLAN/COASTAL ZONING ORDINANCE AMENDMENT**

Staff recommends the Commission certify the proposed IP/CZO amendment, with three (3) suggested modifications as shown below. Existing language of the certified Implementation Plan/Coastal Zoning Ordinance is shown in straight type. Language proposed to be added by the County of Santa Barbara in this amendment is shown underlined. Language proposed to be deleted by the County of Santa Barbara in this amendment is shown as ~~strikethrough~~. Language recommended by Commission staff to be inserted is shown in double underline. Language recommended by Commission staff to be deleted is shown in ~~double-strikethrough~~.

### **Suggested Modification No. 1**

Section 35-74.7.2 shall be modified as follows:

Section 35-74.7 Lot Size/Density

...

2. DR zoned lots may be rezoned with two numbers following the DR on the lot on the applicable Santa Barbara County Zoning Map. In this instance the first number represents the minimum dwelling units per gross acre and the second number represents the maximum dwelling units per gross acre as follows:

<u>District Designation</u>	<u>Dwelling Units Per Gross Acre Minimum Dwelling Units per Gross Acre</u>	<u>Gross Land Area Per Dwelling Unit Maximum Dwelling Units per Gross Acre</u>
<u>DR-20/25</u>	<u>20</u>	<u>25</u>
<u>DR-20/30</u>	<u>20</u>	<u>30</u>
<u>DR-30/40</u>	<u>30</u>	<u>40</u>

**Suggested Modification No. 2**

Added Section 35-144Z.3 shall be modified as follows:

Section 35-144Z.3 Permit Requirements.

Housing developments that shall comply with all of the development standards in Section 35.144Z.4 (Development Standards), below, and shall be allowed as a use by right subject to the issuance of a Coastal Development Permit in compliance with Section 35-169 (Coastal Development Permits).

1. Use by right. For purposes of this section, "use by right" means the County's review shall not require a Conditional Use Permit, Development Plan, environmental review under the California Environmental Quality Act, or other discretionary review or approval pursuant to Government Code Section 65583.2(i) and Government Code Section 65589.5 for multifamily residential housing. Housing developments shall be subject to all objective standards in this Article and all applicable policies and provisions of the Local Coastal Program. Any subdivision of a site shall continue to be subject to all laws, including, but not limited to, discretionary review and approval in compliance with County Code Chapter 21 (Land Division) and the Subdivision Map Act.

**Suggested Modification No. 3**

Added Section 35-144Z.4 shall be modified as follows:

Section 35-144Z.4 Development Standards.

Housing developments on a rezone site ~~or non-vacant or vacant site~~ listed in Section

~~35-144Z.2.1.a and Section 35-144Z.2.2.a, respectively,~~ above, shall comply with the following development standards.

...

2. Affordability. The following affordability standards shall not apply to site APN 075-020-035. At least ~~20~~ 32 percent of the total units shall be affordable, which shall consist of (1) at least 20 percent of units shall be affordable to very low- and/or low-income households, and (2) at least 12 percent of the units shall be affordable to very low-, low-, and/or moderate-income households. The applicant shall record a restrictive covenant that ensures the continued affordability of all very low-, ~~and low-, and moderate-income~~ rental and for sale units for the life of the housing development ~~90 years and all very low- low income for sale units for 90 years, unless a different affordability term is required by low income housing tax credit regulations or other applicable law.~~

...

3. Objective standards. The housing development shall comply with all objective land use policies, regulations, development standards, and design review standards of the Local Coastal Program in effect at the time a complete application is submitted, including but not limited to objective design standards provided in Section 35-144B (Multiple-Unit and Mixed-Use Housing Objective Design Standards).

## **V. FINDINGS FOR APPROVAL OF THE LUP AMENDMENT AS SUBMITTED, DENIAL OF THE IP/CZO AMENDMENT AS SUBMITTED, AND APPROVAL OF THE IP/CZO AMENDMENT, IF MODIFIED AS SUGGESTED**

The following findings support the Commission's certification of the proposed Land Use Plan (LUP) amendment as submitted, the Commission's denial of the proposed Implementation Plan/Coastal Zoning Ordinance (IP/CZO) Amendment as submitted, and approval of the IP/CZO Amendment if modified as suggested in Section IV (Suggested Modifications) above. The Commission hereby finds and declares as follows:

### **A. Amendment Description and Background**

The County of Santa Barbara is requesting an amendment to the Land Use Plan (LUP) and Implementation Plan/Coastal Zoning Ordinance (IP/CZO) portions of its certified Local Coastal Program (LCP) to rezone four sites and amend various sections of the IP/CZO in order to implement Programs 1, 2, and 3 of the County's adopted 2023-2031 Housing Element Update, including the establishment of a new Design Residential (DR) zoning designation with minimum and maximum densities, the rezoning of four sites to the new DR zone district, establish ministerial permit requirements and development standards for projects qualifying for "By Right" processing pursuant to state law.

County of Santa Barbara Housing Element Update

Based upon the 2023-2031 Regional Housing Needs Assessment (RHNA) for Santa Barbara County, the County must plan to accommodate a total of 5,664 units. The California Department of Housing and Community Development (HCD) and the Santa Barbara County Association of Governments (SBCAG) required that 73 percent of the RHNA, or 4,142 units, must be located in the South Coast region of Santa Barbara County (SBCAG, Regional Housing Needs Allocation Plan 6<sup>th</sup> cycle 2023-2031; July 15, 2021). South Coast includes the cities of Santa Barbara, Goleta, and Carpinteria, as well as unincorporated communities such as Hope Ranch, Summerland, Montecito, Mission Canyon, and Isla Vista. After accounting for projected accessory dwelling units, pending projects, and suitable and available vacant sites under current zoning, the County had a RHNA shortfall of 1,520 lower-income units and 518 moderate-income units in the South Coast.<sup>1</sup> As such, HCD required the County to rezone sufficient sites to accommodate its RHNA shortfall.

Additionally, the State's Affirmatively Furthering Fair Housing (AFFH) law required the County to "identify sites throughout the community" to accommodate its RHNA. This reflects the fact that housing needs exist across the county, especially along the South Coast. The County needed to identify potential rezone sites that could be developed during the current 8-year housing element planning period in this area to help correct the jobs-housing imbalance in the Carpinteria Valley, thereby reducing vehicle miles traveled and greenhouse gas emissions from commuters who commute into the area for work. Therefore, the AFFH law compelled the County to examine more than 100 sites in the Carpinteria Valley.

Additional aspects of Housing Element Program 1 that must be factored into the proposed amendment include:

- Density Minimums: Government Code Section 65583.2(c)(3) requires that a minimum residential density of at least 20 units per acre be applied to all rezone sites used to accommodate a County's RHNA for lower-income units.
- Number of Units: Government Code Section 65583.2(h) and Program 1 require that rezone sites permit at least 16 units per site.
- Ministerial Permitting: Government Code Section 65583.2(h) and Program 1 require that a County permit "use-by-right" owner-occupied and rental multifamily housing projects that provide at least 20 percent of the units as affordable to lower-income households. As defined in Government Code Section 65583, "use-by-right" means that the housing project is not subject to discretionary review or approval or environmental review under California Environmental Quality Act (CEQA).

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<sup>1</sup> To provide adequate housing for the full spectrum of income levels, the allocated number of housing units each jurisdiction must provide for is distributed by varying income categories. The State uses the income categories established by the U.S. Department of Housing and Urban Development (HUD), which groups income ranges for different household types into five income categories: extremely low, very low, low, moderate, and above-moderate household income. HUD bases the household income for each of these categories on a percentage of a particular region's area median income (AMI).

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- **Development Standards:** Various state housing laws require that development standards applied to rezone sites must be “objective”, such that ministerial and streamlined permitting can be accomplished and density targets can be achieved without imposing unreasonable constraints on housing build-out.

Design Residential (DR) Land Use Designation and Zone District

State law requires that zoning designations be consistent with the land use plan. Therefore, the proposed LUP amendment includes amending the current land use designation for the following sites that the County proposes to rezone to accommodate its RHNA, plus the 15 percent buffer for lower- and moderate-income levels as required by HCD. Furthermore, the County proposes to amend the IP/CZO to create a new Design Residential (DR) zone district with minimum and maximum densities from at least 20 units per acre and up to 40 units per acre.

The LUP and IP/CZO amendment includes the following four rezones:

Site Name & APN(s)	Acres	Existing Land Use Designation	Proposed Land Use Designation	Existing Zone Designation	Proposed Zone Designation	Anticipated Residential Yield (Units)
Friendship Manor (075-020-035)	1.20	Residential-20	Residential-30/40	High Density Student Residential (SR-H) -20	Design Residential (DR) – 30/40	36
Van Wingerden 1 (004-013-023)	15.1	Agriculture (A)-I-5	Residential-20/30	Agriculture (A)-I-5	Design Residential (DR) – 20/30	236
Van Wingerden 2 (004-005-001)	9.68	Agriculture (A)-I-10	Residential-20/30	Agriculture (A)-I-10	Design Residential (DR) – 20/30	180
Bailard (001-080-045) (001-080-046)	6.98	Residential-0.33	Residential-20	Single Family Residential 3-E-1	Design Residential (DR) – 20	182
						Total: 634 new dwelling units

Where environmentally sensitive habitat areas, wetlands, areas of steep slopes, or other such constraints may occur, the County conservatively calculated the capacity of such sites and assigned a land use designation. Specifically, the County calculated the projected buildout capacity of potential rezoning sites using the minimum density rather than the maximum density to reduce the chances that housing projects will develop fewer units than projected. The County estimates that the anticipated overall capacity of the four sites within the South Coast coastal zone that are available for redesignation as part of the Housing Element Rezone would amount to 634 units.

A description of each of the four sites is found below.

Friendship Manor – This site is a vacant 1.2-acre property owned by the University of California, Santa Barbara. It is situated south of El Colegio Road and west of Camino Pescadero within the Isla Vista community ([Exhibit 8](#)). Although the parcel is vacant, it unofficially serves as an unpaved parking and storage lot and is not currently known to support environmentally sensitive habitat. The site is an infill site within a designated Urban Area, located in the high-density and largely developed Isla Vista area, and is surrounded, by large multifamily, multistory residential buildings. The proposed density and rezoning from High-Density Student Residential 20 (SR-H-20) to Design Residential 30/40 maintains the parcel's residential zoning while providing more flexibility to accommodate lower-income and non-student households. The County estimates that this density could potentially support 36 units. This site is not in the Coastal Commission's appeals jurisdiction (as described in Coastal Act Section 30603).

Van Wingerden 1 – This agriculturally zoned site is a 15.1-acre parcel that adjoins the city limits of Carpinteria and a County-designated Urban Area. It is located at 4098 Via Real Road in the Carpinteria area and approximately 400 feet north of Highway 101 ([Exhibit 5](#)). Additionally, this site is adjacent to agricultural lands to the north and commercial, religious, and multi-family developments to the south, as well as a single-family residential tract to the east. The site is designated as a Rural Area and is located along the urban-rural boundary. Van Wingerden 1 is currently used for storage, plant research, and growing avocados, pumpkins, cut flowers, and potted orchids. The County estimates that the proposed rezoning from Agricultural to Design Residential 20/30 would support 236 units. This site is not in the Coastal Commission's appeals jurisdiction.

Van Wingerden 2 – This agriculturally zoned site is a 9.68-acre parcel that adjoins the city limits of Carpinteria ([Exhibit 6](#)). The site is located at 4711 Foothill Road in the Carpinteria area, directly across from Carpinteria High School, which is situated to the north. The United Boys and Girls Club and a low-density residential neighborhood are located to the east of the site. Additionally, the site is adjacent to agricultural lands, which are developed with greenhouses to the west and south. The site is designated as a Rural Area and is located along the urban-rural boundary. Van Wingerden 2 is currently developed with wood greenhouses constructed in the 1960s and is used for growing cut flowers and potted orchids. The County estimates that the proposed rezoning from Agricultural to Design Residential 20/30 would support 180 units. The majority of this site is not in the Coastal Commission's appeals jurisdiction.

Bailard – The Bailard site is a 6.98-acre site comprising two parcels zoned 3-E-1, Single Family Residential, and is located at 1101 and 1103 Bailard Avenue, in the Carpinteria area ([Exhibit 7](#)). The site is developed with four residences, accessory structures, and approximately 3 acres of seasonal row crops, and is not known to contain environmentally sensitive habitat. The site adjoins the city limits of Carpinteria and is surrounded by multi-family dwellings to the south, a public park to the east (Monte Vista Park), and single-family dwellings and orchards to the west and east. Additionally, agricultural lands are located to the north. The site is designated as a Rural Area and is located along the urban-rural boundary. The County estimates that the proposed rezoning from Single Family Residential (3-E-1) to Design Residential 20 would support 182 units. This site is not in the Coastal Commission's appeals jurisdiction. Developers of the Bailard site have also partnered with

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the County's Housing Authority, who have a pending application with the County for a multi-family housing project on the site.

### Urban/Rural Boundary

The County's LCP only permits high-density residential development to be located within designated Urban Areas, and not in Rural Areas. To facilitate the development of high-density residential development on the rezoned sites, the LUP amendment includes the redesignation of the Van Wingerden 1, Van Wingerden 2, Bailard, and an adjacent parcel west of Bailard (APN 001-080-009) from Rural to Urban Areas. Additionally, this change requires a realignment of the Urban-Rural Boundary on the County's Land Use Plan maps.

### Use-By-Right, Housing Element Development Standards

The proposed IP/CZO amendment introduces a new Section 35-144Z (Use By Right, Housing Element) in order to facilitate the future development of affordable housing projects on the four designated sites that have been rezoned to support the County's Housing Element programs. The proposed section, when applied, will enable the "by-right" development of multi-family residential housing at specified densities and require that at least 20 percent of the units be designated as affordable for a period of 90 years, upon issuance of a Coastal Development Permit (CDP). Specifically, the amendment mandates that housing development projects include a minimum of 20 percent of units affordable to very low- and/or low-income households. Additionally, as proposed, the applicant would be required to record a restrictive covenant that guarantees these units remain affordable for a period of 90 years.

"Use by Right" means the County must process a multi-family residential housing development project without requiring a Conditional Use Permit, Development Plan, environmental review under CEQA, or other discretionary review or approval. Proposed Section 35-144Z further includes the process for permit approval, development standards for proposed housing projects, and any required "mitigation, monitoring, and reporting requirements" associated with potential impacts of these projects.

Lastly, the proposed IP/CZO amendment includes a new Section 35-144Y (Replacement Housing on Non-Vacant Sites) to implement unit replacement requirements for housing development projects on non-vacant sites identified in the County's Housing Element, required by state law, and amends the Design Residential zone standards to allow all or a portion of the required open space to be public open space and developed as public parks, trails, or other public recreational facilities.

The County of Santa Barbara submitted the subject LCP Amendment to the Commission on July 10, 2024. The amendment submittal was deemed complete by Commission staff and filed on April 24, 2025. At its June 11, 2025, Commission meeting, the Commission extended the 90-day time limit to act on the LCP amendment for a period not to exceed one year.

Commission and County staff have coordinated and met to discuss the proposed

amendment. The suggested modifications were developed in cooperation with County staff and the property owners of the Bailard and Van Wingerden 1 and 2 sites, and County staff and property owners have indicated that they are supportive of the suggested modifications.

The full text of the County's proposed changes to the LUP and IP/CZO is included as [Exhibits 1-3](#) of this report.

## **B. Consistency Analysis**

Pursuant to Sections 30512, 30513, and 30514 of the Coastal Act, the standard of review for the proposed Land Use Plan amendment is the Chapter 3 policies of the Coastal Act, and the standard of review for the proposed amendment to the Implementation Plan/Coastal Zoning Ordinance (IP/CZO) portion of the certified LCP is whether the proposed amendment would be in conformance with, and adequate to carry out, the provisions of the certified Land Use Plan (LUP) component of the certified LCP, including the Chapter 3 policies of the Coastal Act which have been incorporated in their entirety in the certified County LUP as guiding policies pursuant to Policy 1-1 of the LUP.

### **1. Agriculture**

Section 30113 of the Coastal Act defines "prime agricultural land" as

...those lands defined in paragraph (1), (2), (3), or (4) of subdivision (c) of Section 51201 of the Government Code.<sup>2</sup>

Section 30241 of the Coastal Act states:

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:

- (a) By establishing stable boundaries separating urban and rural areas, including, where necessary, clearly defined buffer areas to minimize conflicts between agricultural and urban land uses.
- (b) 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

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<sup>2</sup> Government Code Section 51201(c) defines such lands as: 1. All land that qualifies for rating as class I or class II in the Natural Resource Conservation Service land use capability classifications. 2. Land which qualifies for rating 80 through 100 in the Storie Index Rating. 3. Land which supports livestock used for the production of food and fiber and which has an annual carrying capacity equivalent to at least one animal unit per acre as defined by the United States Department of Agriculture. 4. Land planted with fruit or nut-bearing trees, vines, bushes or crops which have a nonbearing period of less than five years and which will normally return during the commercial bearing period on an annual basis from the production of unprocessed agricultural plant production not less than two hundred dollars (\$200) per acre.

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complete a logical and viable neighborhood and contribute to the establishment of a stable limit to urban development.

- (c) By permitting the conversion of agricultural land surrounded by urban uses where the conversion of the land would be consistent with Section 30250.
- (d) By developing available lands not suited for agriculture prior to the conversion of agricultural lands.
- (e) By assuring that public service and facility expansions and nonagricultural development do not impair agricultural viability, either through increased assessment costs or degraded air and water quality.
- (f) By assuring that all divisions of prime agricultural lands, except those conversions approved pursuant to subdivision (b), and all development adjacent to prime agricultural lands shall not diminish the productivity of such prime agricultural lands.

Section 30242 of the Coastal Act states:

All other lands suitable for agricultural use shall not be converted to nonagricultural uses unless (1) continued or renewed agricultural use is not feasible, or (2) such conversion would preserve prime agricultural land or concentrate development consistent with Section 30250 such permitted conversion shall be compatible with continued agricultural use on surrounding lands.

Section 30243 of the Coastal Act states, in part:

The long-term productivity of soils... shall be protected....

Applicable Land Use Plan Policies

Policy 8-1 of the LUP states:

An agricultural land use designation shall be given to any parcel in rural areas that meets one or more of the following criteria:

- a. Prime agricultural soils (Capability Classes I and II as determined by the U.S. Soil Conservation Service).
- b. Other prime agricultural lands as defined in Section 51201 of the Public Resources Code (Appendix A).
- c. Lands in existing agricultural use.
- d. Lands with agricultural potential (e.g., soil, topography, and location that will support long term agricultural use).

These criteria shall also be used for designating agricultural land use in urban

areas, except where agricultural viability is already severely impaired by conflicts with urban uses.

Policy 8-3 of the LUP states:

If a parcel is designated for agricultural use and is located in a rural area contiguous with the urban/rural boundary, conversion shall not be permitted unless:

- a. The agricultural use of the land is severely impaired because of physical factors (e.g., high water table), topographical constraints, or urban conflicts (e.g., surrounded by urban uses which inhibit production or make it impossible to qualify for agricultural preserve status), and
- b. Conversion would contribute to the logical completion of an existing urban neighborhood, and
- c. There are no alternative areas appropriate for infilling within the urban area or there are no other parcels along the urban periphery where the agricultural potential is more severely restricted.

Applicable Implementation Plan/Coastal Zoning Ordinance (IP/CZO) Policies

Section 35-144O. Agricultural Buffers.

A. Purpose and Intent. The purpose of agricultural buffers is to implement adopted Coastal Land Use Plan policies that assure and enhance the continuation of agriculture as a major viable production industry in Santa Barbara County through establishing development standards that provide for the creation on buffers between agricultural uses and new non-agricultural development and uses. The intent of agricultural buffers is to minimize potential conflicts between agricultural and adjacent land uses that result from noise, dust, light, and odor incidental to normal agricultural operations as well as potential conflicts originating from residential and other non-agricultural uses (e.g., domestic pets, insect pests and invasive weeds).

...

D. Agricultural buffer requirements. All applications subject to this Section shall designate and maintain an agricultural buffer on the project site in compliance with this Section.

...

2. Agricultural buffer location. The agricultural buffer shall be located:

a.

On the lot on which the non-agricultural project is proposed.

A fundamental policy of the Coastal Act and Santa Barbara County's Coastal Land Use Plan is the protection of agricultural resources. Specifically, the LCP incorporates Sections 30113, 30241, and 30243 of the Coastal Act as guiding principles. Section 30113 of the

Coastal Act defines prime agricultural land, and Section 30241 of the Coastal Act requires the maintenance of the maximum amount of prime agricultural land in agricultural production to assure the protection of agricultural economies. Furthermore, Section 30241 mandates that conflicts shall be minimized between agricultural and urban land uses by establishing stable boundaries separating urban and rural areas, including, where necessary, clearly defined buffer areas to minimize conflicts between agricultural and urban land uses. Additionally, Section 30241 also provides that parcels designated for agricultural use located in rural areas contiguous with the urban/rural boundary shall not be converted unless the agricultural use is severely impaired because of physical factors, topographical constraints, or urban conflicts, and the conversion would contribute to the logical completion of the existing urban neighborhood, and there are no alternative areas appropriate for infilling within the urban area. Section 30243 requires the protection of the long-term productivity of soils.

### Background: Santa Barbara County Agriculture and Current Agriculture Use

Agriculture is a dominant land use and a significant production industry in Santa Barbara County. The South Coast areas of the County retain world-class production of cut flowers and nursery products. Avocados, citrus, row crops, and exotic fruits such as sapotes and cherimoyas are grown in the Carpinteria and Goleta Valleys. The combination of mild climatic conditions, prime agricultural soils, available water sources, and proximity to major markets makes the area a valuable agricultural resource. Farther north, the Gaviota Coast supports avocado, citrus and cherimoya orchards, and cattle grazing. The primary land use in the North Gaviota Coast is cattle grazing. This agricultural diversity contributes to the overall agricultural productivity of the area by providing growers with the flexibility to respond to market and environmental changes.

Carpinteria Valley has distinct agricultural subareas. The valley's westerly end is a mix of avocado orchards, greenhouses, and open field flowers. The valley's floor to the east and north of the City of Carpinteria is one of the most fertile and productive agricultural areas in the valley, and support avocados and lemons. Additionally, greenhouses, including those used for indoor cannabis cultivation, are prevalent on the flatter reaches of the area. Urban development in the Carpinteria Valley is mainly confined within the city limits of Carpinteria and several neighborhoods scattered above the valley floor and along the coastline.

### Agricultural Land Use Designations

In order to provide for the long-term protection of agricultural resources, LUP Policy 8-1 states that an agricultural land use designation is given to any parcel that is prime agricultural land or contains prime agricultural soils, or lands in existing agricultural use or with agricultural potential. Under the County's Coastal LUP and IP/CZO, two agricultural land use/zoning designations are used: Agriculture I and Agriculture II. The majority of privately owned land under the County's jurisdiction is zoned one of these two agricultural designations. Agriculture I is used to designate lands for long-term agricultural use within or adjacent to urbanized areas and to preserve prime agricultural soils, such as the high return, specialty crop areas within the urbanized portion of the County's South Coast. The

purpose of the Agriculture II designation is to establish agricultural land use for large prime and non-prime agricultural lands in the rural areas of the County and to preserve prime and non-prime soils for long-term agricultural use. The ranches and large scale grazing operations typical of the rural area from Ellwood to Gaviota, the Hollister and Bixby Ranches, and North Coast are designated as Agriculture II. Conversion of land that is designated for agricultural use is only permitted in limited circumstances and if certain criteria are met, as detailed in the Coastal Act and LUP policies detailed above.

### Urban-Rural Boundary

To prevent further urban encroachment onto the County's designated agricultural lands and to encourage infilling within urban areas, an urban/rural boundary is delineated on the County's Coastal Land Use Plan map. The purpose of an urban/rural boundary is to clearly delineate areas appropriate for urban land use, i.e., residential, commercial and industrial, from areas where rural uses should be sustained, principally agriculture but including rural residential, coastal dependent industry, and limited highway commercial activities where necessary. The urban/rural boundary is not necessarily defined on a jurisdictional basis; for example, agriculturally designated lands within city limits that are located on the urban fringe and contiguous with other agricultural parcels would be included in the rural area. Conversely, a residential subdivision contiguous to other urban uses by in an unincorporated area would be considered urban. The principal determinant in establishing an urban/rural boundary is the preservation of existing agricultural lands, while allowing for reasonable growth within urban areas through infilling and logical expansion outward. To this end, criteria for designating agricultural lands, not as a transitional land use but for agricultural use over the long term have been incorporated into the LCP.

The preservation of lands with prime agricultural soils, i.e., Class I or Class II according to the U.S. Soil Conservation Service, is the highest priority. Prime agricultural lands, as defined in Section 51201 of the Government Code, and lands in existing agricultural production are the next most important to receive agricultural land use designations. Finally, lands not in production but having agricultural potential (i.e., soils, topography, location and other factors which will support long-term agricultural production) are identified for agricultural use.

The prime agricultural lands of the Carpinteria Valley have also been subject to urban encroachment. At present, the City of Carpinteria boundaries generally abut properties with prime soils or prime agricultural lands within the unincorporated County area. The urban area of Carpinteria Valley includes those areas contiguous with the existing City limits where the agricultural potential is severely impaired because of poor soils and drainage conditions or where conflicts with surrounding urban uses exist provide a stable demarcation between the agricultural lands of the Carpinteria Valley and those areas appropriate for infilling of urban uses for the foreseeable future. Due to the mix of urban and agricultural land uses in the Carpinteria Valley, urban/agricultural conflicts sometimes occur along the urban periphery and in more remote areas of the Valley where neighborhoods have been permitted to develop within the city limits of Carpinteria.

### **Approval of the Amendment to the LUP As Submitted**

### Land Use Designation Changes

The County is proposing to change the land use designations for two sites, Van Wingerden 1 and Van Wingerden 2 (Assessor's Parcel Numbers [APNs] 004-013-023 and 004-005-001, respectively), from Agricultural I-5 and Agricultural I-10, respectively to Residential 20/30 (Residential at 20 minimum/30 maximum dwelling units per acre). These parcels, comprising a total of approximately 25 acres, are located within the Carpinteria Valley and are adjacent to other AG-designated lands and residential/urban development. Additionally, these parcels are contiguous with the urban/rural boundary ([Exhibits 5 & 6](#)). The County is proposing the land use designation changes to these two sites in order to accommodate its RHNA shortfall under the County's 2023-2031 Housing Element Update planning period. The proposed amendment raises the issue of whether the conversion of agricultural lands to residential use is consistent with the Chapter 3 policies of the Coastal Act.

The Van Wingerden 1 site contains approximately 1.9 acres (approximately 12 percent of the total parcel) of prime soils (prime Elder fine sandy loam soil), and the rest of the site contains non-prime soils (Camarillo fine sandy loam soil). The Van Wingerden 2 site contains 5.2-acres (approximately 54 percent of the total parcel) of prime soils (prime Elder fine sandy loam soil), and the rest of the site contains non-prime soils (Camarillo fine sandy loam soil). Therefore, per Section 30113 of the Coastal Act, the subject site meets the definition of "prime agricultural land", and Section 30241 is applicable in this case.

The Coastal Act only allows for conversion of agricultural land in very limited situations. Coastal Act Section 30241 provides the limitations on conversion of parcels designated for agricultural use to other land uses. Conversion of agricultural land to non-agricultural uses around the periphery of urban areas may only occur where the viability of agriculture is severely limited *or* where conversion would complete a logical boundary and contribute to a stable limit to urban development. Section 30241 also requires minimizing conflicts between agricultural and urban land uses through six tests. Each of these six tests required by Section 30241 are reviewed below:

- (a) By establishing stable boundaries separating urban and rural areas, including, where necessary, clearly defined buffer areas to minimize conflicts between agricultural and urban land uses.*
- (b) 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.*

Van Wingerden 1 is a 15.1-acre parcel that adjoins the city limits of Carpinteria, lies along the urban-rural boundary, and is directly adjacent to a county-designated urban area. The site is adjacent to agricultural lands to the north; however, it is also surrounded on three sides by urban development (approximately 60 percent of its perimeter), including commercial, religious, and multifamily development to the south, west, and a single-family

residential tract to the east. Currently, the site creates a gap in the continuity of residential uses to the east and west. Incorporating this site into the Urban Area would create a more defined and consistent boundary between agricultural lands to the north and the urban development to the south. This change would help establish a more stable urban-rural boundary and provide a clear limit to urban expansion, as required by Section 30241(a).

Van Wingerden 2 is a 9.68-acre parcel that also adjoins the city limits of Carpinteria, is along the urban-rural boundary, and is surrounded on three sides by urban development, including the Carpinteria High School and single-family residential tracts. The site forms part of a "finger" peninsula that extends into the urban area, with Carpinteria High School to the north and the United Boys and Girls Club, along with a residential development, to the east. Additionally, it borders agricultural land developed with greenhouses to the west and south. This configuration of the urban-rural boundary has resulted in conflicts between the agricultural operations on Van Wingerden 2 and the surrounding urban uses. For example, its proximity to schools requires the site to be subject to State-mandated reporting requirements and restrictions on the types of pesticides utilized on the site, which inhibit agricultural production. Incorporating Van Wingerden 2 into the urban area would eliminate most of this "finger" and create a more consistent boundary between agricultural uses to the west and urban development to the south and east, thereby establishing a more stable urban-rural boundary, as required by Section 30241(a). The proposed rezoning would encourage residential development near existing urban areas, thus avoiding leapfrog development into neighboring agricultural lands.

As such, the proposed amendment would establish a stable urban-rural boundary, as required by Section 30241(a), and complete a logical and viable neighborhood, thereby contributing to the establishment of a stable limit to urban development, as required by Section 30241(b). Furthermore, the proximity of these sites to the City of Carpinteria and current residential neighborhoods makes them a logical extension of viable communities and contributes to the establishment of a stable limit to urban development, as required by Section 30241(b).

*(c) By permitting the conversion of agricultural land surrounded by urban uses where the conversion of the land would be consistent with Section 30250.*

In order to minimize conflicts between agricultural and urban land uses, the conversion of agricultural land surrounded by urban uses is permitted where the conversion of land would be consistent with Section 30250. Section 30250 states in part that:

(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.

As previously mentioned, the proposed sites for conversion are located adjacent to urban areas and are adjacent to essential public infrastructure, including water and sewer

systems. According to County staff, both sites will receive services from the Carpinteria Valley Water District and the Carpinteria Sanitary District. Both districts have confirmed that they have sufficient capacity to provide public water and sewer services for these locations, in accordance with Section 30241(c). Moreover, the County's certified LCP includes policies and provisions designed to protect coastal resources. Any residential development proposed for these sites will be required to obtain a coastal development permit, and any new development will need to be found consistent with the coastal resource protection policies outlined in the County's LCP, including Coastal Act Section 30250.

*(d) By developing available lands not suited for agriculture prior to the conversion of agricultural lands.*

The test of Section 30241(d) requires that available lands unsuited for agriculture be developed before converting agricultural lands to minimize conflicts between agricultural and urban land uses.

The County conducted a thorough search for potential rezone sites in the Carpinteria Valley. Most of the identified rezone sites located within or near urban areas are concentrated around the City of Carpinteria, within the Coastal Zone, and are primarily designated for agricultural use. Additionally, except for the Urban Area adjoining Van Wingerden 1 to the east, which is already fully built out with residential development, all other potential rezone sites in the unincorporated portions of the Carpinteria Valley are located in Rural Areas.

According to County staff, there are no urban areas within the unincorporated Carpinteria Valley available for housing. The County analyzed nearly 200 sites in this area, with over 90 percent of those sites zoned for agriculture. With the exception of the Bailard site, the non-agriculturally zoned vacant parcels did not meet the County's criteria for potential land use redesignations or rezonings due to their small size (i.e., less than half an acre) and environmental constraints. Additionally, many sites were eliminated because they would not contribute to the logical completion of an existing urban neighborhood and were not contiguous with either the City of Carpinteria or a designated Urban Area. The County's alternative analysis also evaluated other environmental constraints, distance from infrastructure, and coastal resources. Many sites were discarded due to factors such as significant environmentally sensitive habitats, steep slopes, flood hazards, or prime agricultural soils. The County ultimately identified Van Wingerden 1 and 2 as the only agriculturally designated/zoned parcels in the Carpinteria Valley that best met all the necessary criteria, thereby providing for a more stable urban-rural boundary and fulfilling the requirements of Section 30241(d).

*(e) By assuring that public service and facility expansions and nonagricultural development do not impair agricultural viability, either through increased assessment costs or degraded air and water quality.*

*(f) By assuring that all divisions of prime agricultural lands, except those conversions approved pursuant to subdivision (b), and all development adjacent to prime*

*agricultural lands shall not diminish the productivity of such prime agricultural lands.*

Section 30241(e) establishes a policy to ensure that public services, facility expansions, and non-agricultural development do not harm agricultural viability, in order to minimize conflicts between agricultural and urban land uses. Additionally, Section 30241(f) mandates that all development adjacent to prime agricultural lands must not reduce the productivity of those lands. Although no CDP for residential development on the subject sites has yet been approved in conjunction with this amendment, the proposed amendment will facilitate future residential development on these sites.

As previously mentioned, any future residential development proposals will need to obtain a coastal development permit that complies with the coastal resource protection policies outlined in the County's LCP, including those policies that specifically protect agricultural resources and ensure the continuation of viable agriculture by minimizing conflicts between agricultural uses and new non-agricultural development and uses. For instance, IP/CZO Section 35-144O.D requires agricultural buffers ranging from 100 to 300 feet between urban uses and adjacent rural agricultural operations. These buffers are designed to reduce potential conflicts arising from noise, dust, light, and odor that are common in normal agricultural practices, as well as possible issues stemming from residential and other non-agricultural uses. Therefore, it is expected that new non-agricultural developments adjacent to agricultural lands will not compromise agricultural viability or diminish the productivity of prime agricultural lands, in line with Sections 30241(e) and (f).

### Conclusion

In conclusion, the proposed amendment to convert two sites from agricultural to residential use around the periphery of urban areas would complete a logical boundary and contribute to a stable limit to urban development and meets all six tests of Section 30241. Therefore, the Commission finds that the proposed Van Wingerden 1 and Van Wingerden 2 land use redesignations, as submitted, are consistent with and adequate to carry out the provisions of Coastal Act Section 30241, and meet the guidance provided in LUP Policies 8-1 and 8-3.

### Urban/Rural Boundary Realignment

The LCP only permits high-density residential development to be located within designated Urban Areas, and not in Rural Areas. To facilitate the development of high-density residential development on the rezoned sites, the LUP amendment includes the redesignation of the Van Wingerden 1, Van Wingerden 2, Bailard, and an adjacent parcel west of Bailard (APN 001-080-009) from Rural to Urban Areas. Additionally, this change necessitates a realignment of the Urban-Rural Boundary on the County's Land Use Plan maps.

### Van Wingerden 1 and 2

As discussed in greater detail above, realigning the urban-rural boundary to encompass Van Wingerden 1 and 2 as urban would establish a more stable urban-rural boundary between existing urban uses and adjacent agricultural lands, thereby contributing to the establishment of a stable limit to urban development and preserving existing agricultural

lands. Additionally, existing development standards regarding agricultural buffers would protect adjacent agricultural lands from any new housing developments on these sites.

### Bailard

The Bailard site, which is located at 1101 and 1103 Bailard Avenue, adjoins the city limits of Carpinteria and is surrounded by multi-family dwellings to the south, a public park to the east (Monte Vista Park), and single-family dwellings and orchards to the west and east. Additionally, agricultural lands are located to the north ([Exhibit 7](#)). The site is currently designated within a Rural Neighborhood (Monte Vista/Lomita Lane) and is located along the urban-rural boundary.

Realignment of the urban-rural boundary to bring Bailard, and an adjacent residentially-zoned parcel west of Bailard (APN 001-080-009), into the urban area to allow high-density multifamily development, and adjacent to existing multi-family development to the south, would be an intensification of the existing use rather than a conversion of one use to another. Therefore, bringing these sites into the urban area would maintain a stable urban-rural boundary. In addition, existing development standards regarding agricultural buffers would protect adjacent agricultural lands from any new housing developments on this site. Furthermore, redesignating Bailard as an urban area would have created a Rural Neighborhood that consists of one parcel, a 2.50-acre residentially-zoned parcel (APN 001-080-009) west of Bailard, and isolated from the rest of the Rural neighborhood. As such, the County further proposes to incorporate this residentially-zoned parcel (APN 001-080-009) into an urban area. This parcel is not proposed for rezoning under this amendment.

Therefore, the new urban-rural boundary that would exist under the proposed LCP amendment would be more stable and would ensure a permanent limit to urban development than the existing urban-rural boundary currently established. Additionally, this alignment would ensure the agricultural viability of existing agricultural operations will not be significantly impacted when future housing development is developed on these sites, while allowing for reasonable growth within urban areas through infilling and logical expansion outward, consistent with Section 30241 of the Coastal Act.

### Conclusion

For all of the reasons stated above, the Commission finds the proposed LUP amendment, as submitted, is consistent with the agricultural resource policies of the Coastal Act.

## **2. New Development**

Coastal Act Section 30250(a) requires new development to be sited within or as close as possible to existing developed areas, where it can be accommodated and adequately served by public services (utilities and infrastructure) without adverse impacts to coastal resources. Section 30251 requires that development minimize the alteration of natural landforms and maintain compatibility with the character of the surrounding area. Finally, Section 30253(a) requires new development to minimize risks to life and property in areas of high geologic and fire hazards, while subsection (d) requires that vehicle miles traveled

and energy consumption be minimized.

The proposed LUP and IP/CZO amendment aims primarily to increase the density allowed on specific sites to facilitate the development of multi-family residential projects that include affordable housing units. A new Design Residential (DR) zoning district will be established with specified minimum and maximum densities to address the County's RHNA shortfall. All four sites proposed for redesignation—Van Wingerden 1 and 2, Bailard, and Friendship Manor—are located adjacent to existing developed areas and can be readily served by public utility services, in accordance with Coastal Act Section 30250(a).

Under the proposed residential land use and zoning designations, any future development or redevelopment of these sites will be required to include multi-family housing. Specifically, the proposed density for Friendship Manor would increase from a maximum of 20 dwelling units per acre (High-Density Student Residential 20 (SR-H-20)) to a range of 30 to 40 dwelling units per acre. The land use and DR zone designation for Bailard would permit a maximum density of 20 dwelling units per acre. For Van Wingerden 1 and 2, the allowed density would range from 20 to 30 dwelling units per acre. All sites would be eligible for ministerial (use by right) permitting for individual projects if at least 20 percent of the proposed residential units are designated for lower-income households.

When housing development projects are proposed and approved on these sites, they must be sited in areas capable of accommodating them without causing significant cumulative impacts on coastal resources, as required by Section 30250 of the Coastal Act, which is incorporated by reference into the certified LCP. Additionally, the siting and design of new development must adhere to the requirements of other relevant policies in the certified LCP. These policies include, but are not limited to, provisions related to coastal protection, agricultural productivity, environmentally sensitive habitat areas, public access, visual resources, and minimizing risks to life and property in areas known to have coastal hazards.

For all of the reasons stated above, the Commission finds the proposed LUP amendment, as submitted, is consistent with the policies of the Chapter 3 policies of the Coastal Act, including Section 30250.

The proposed IP/CZO amendment also establishes associated permit requirements and development standards for projects qualifying for "By Right" processing pursuant to state law. Specifically, the amendment introduces a new Section 35-144Z (Use By Right, Housing Element) in order to facilitate the future development of affordable housing projects on the four designated sites that have been rezoned to support the County's Housing Element programs. The proposed section, when applied, will enable the "by-right" development of multi-family residential housing at specified densities and require that at least 20 percent of the units be designated as affordable for a period of 90 years, upon issuance of a Coastal Development Permit (CDP). Specifically, the amendment mandates that housing development projects include a minimum of 20 percent of units affordable to very low- and/or low-income households. Additionally, as proposed, the applicant would be required to record a restrictive covenant that guarantees these units remain affordable for a period of 90 years.

Commission staff coordinated with the County and the property owners of the Bailard and Van Wingerden 1 and 2 sites, to include a higher required minimum number of affordable housing units, including the possibility of moderately priced units, to ensure that a broader range of affordable housing units is available. The landowners and the County have agreed to raise the minimum required number of affordable units from 20 percent of the total units to 32 percent of the total. While the first 20 percent of total units must be affordable for very low or low income households, this additional 12 percent can include very low-, low-, and/or moderate-income units. This increase will result in a significant additional number of affordable units (approximately 71 additional units including all three sites). **Suggested Modification Three (3)** memorializes this agreed-upon affordability requirement for housing development projects on Van Wingerden 1 and 2, and Bailard, by including an additional 12 percent of affordable units, bringing the total required to 32 percent. Furthermore, this modification clarifies that the affordability requirements do not apply to the Friendship Manor site, since the site is now owned by the University of California, Santa Barbara and the University has proposed a student housing development for the site.

Given that high-density residential development will only be allowed on these sites due to the proposed rezones and increased density, as well as the “By-Right” processing, the affordable unit component is integral to these future projects. Any potential impacts of the development will be incurred for the life of the development. Thus, to maintain validity, the units must remain affordable for as long as they exist on the sites. Given that many residential units and structures throughout Santa Barbara County are over 100 years old, requiring these units to remain affordable for only 90 years is insufficient to ensure that the development aligns with the Coastal Act. To prevent future affordable housing from being converted to market-rate housing after the proposed 90 years—which would undermine the balance between affordable housing and coastal resource impacts, **Suggested Modification Three (3)** further incorporates the County and staff agreed upon mandate that Section 35-144Z.4.2 include a restrictive covenant that ensures that all very low-, low-, and moderate-income rental and for-sale units remain affordable for the entire lifespan of the development. This mandate is also consistent with past Commission actions and Section 30604(g)<sup>3</sup> of the Coastal Act.

**Suggested Modifications One (1) and Two (2)** include minor modifications to the proposed amendment language necessary to ensure consistency with the LCP, such as correcting typographical errors and making minor clarifications that further the intent and implementation of the LCP and avoid ambiguity. These modifications do not alter the meaning or substantive provisions of the amendment.

### Conclusion

Therefore, for the reasons discussed above, the Commission finds that only if modified as suggested will the IP/CZO amendment regarding the creation of the DR zone, by-right

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<sup>3</sup> Coastal Act Section 30604(g): The Legislature finds and declares that it is important for the commission to encourage the protection of existing and the provision of new affordable housing opportunities for persons of low and moderate income in the coastal zone.

development standards, and proposed rezones conform with and be adequate to carry out the applicable policies of the certified Land Use Plan.

### **C. California Environmental Quality Act**

Section 21080.9 of the California Public Resources Code—within the California Environmental Quality Act (CEQA)—exempts a local government from the requirement of preparing an environmental impact report (EIR) in connection with its activities and approvals necessary for the preparation and adoption of a local coastal program. Instead, the CEQA responsibilities are assigned to the Coastal Commission; however, the Commission's LCP review and approval program has been found by the Resources Agency to be functionally equivalent to the EIR process. Thus, under CEQA Section 21080.5, the Commission is relieved of the responsibility to prepare an EIR for each LCP action.

Nevertheless, the Commission is required, in approving an LCP amendment submittal, to find that the approval of the proposed LCP, as amended, does conform with CEQA provisions, including the requirement in CEQA section 21080.5(d)(2)(A) that the amended LCP will not be approved or adopted as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse impact which the activity may have on the environment. 14 C.C.R. §§ 13540(f) and 13555(b).

As discussed above, the County's IP/CZO amendment as originally submitted does not conform with, and is not adequate to carry out, the policies of the Land Use Plan (LUP). The Commission has, therefore, suggested modifications to the proposed IP/CZO to include all feasible measures to ensure that potentially significant environmental impacts of new development are minimized to the maximum extent feasible consistent with the requirements of the Coastal Act and CEQA. For the reasons discussed in this report, the LCP amendment, as suggested to be modified, conforms with and is adequate to carry out the coastal resources protection policies of the certified LUP. These modifications represent the Commission's analysis and thoughtful consideration of all significant environmental issues raised in public comments received, including with regard to potential direct and cumulative impacts of the proposed IP/CZO amendment, as well as potential alternatives to the proposed amendment. As discussed in the preceding sections, the Commission's suggested modifications represent the most environmentally protective alternative to bring the proposed IP/CZO amendment into conformity with the LUP consistent with the requirements of the Coastal Act. Therefore, the Commission finds that the proposed LCP amendment, as suggested to be modified, is consistent with CEQA.