

April 10<sup>th</sup> 2025

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Dear Honorable Supervisors

We are long-time residents of Isla Vista with a history of community service and involvement. While we recognize and welcome additional affordable housing in Isla Vista to continue and maintain our community's unique character, diversity and livability, we are deeply concerned that the County has failed to adequately review and analyze the impacts of the proposed project at 6737 Sueno, nor considered the cumulative effect of the other comparable projects that are currently being proposed for the area. We ask the Board of Supervisors to require additional conditions and project modifications to ensure the project will meet all applicable standards and policies, not materially worsen Isla Vista's parking conditions, and contribute positively to our community.

We understand that the State Bonus Density Law provides waivers and concessions for projects that include additional increments of affordable housing. We believe that any bonus density, waivers and/or concessions must be permitted in a manner consistent with the California Coastal Act, including the Local Coastal Plan and Coastal Zoning Ordinance. In other words, the County must harmonize requirements of the California Coastal Act (and the Local Coastal Plan and Coastal Zoning Ordinance) with the Housing Accountability Act. To date, the county has not exercised its discretion to comply with this requirement, and as a result, has overlooked the significant contribution that the project will add to Isla Vista's extreme parking conditions, jeopardizing public health and safety and exasperating the unavailability of coastal access parking for non-residents seeking to enjoy Isla Vistas beaches that is mandated by the California Coastal Act. Additionally, the Project's contribution of additional cars will materially worsen the unsafe conditions that Isla Vista experiences regularly when crowds in streets combine with excessive numbers of parked cars to render emergency and first responders unable to respond to emergencies and catastrophes in the densely congested community. Finally, CEQA requires the County to consider the cumulative effects of this project's contribution to the excessive number of parked vehicles with the past, current, and foreseeable other projects in Isla Vista that will add to this parking shortfall and worsen the impacts to both coastal access and public health, safety and welfare.

Although the purpose of the density bonus program is to provide incentives for the development of affordable housing within the County, as a practical matter, such bonuses and incentives must be consistent with the other resource protection provisions of the LCP to avoid adverse impacts to coastal resources. Here the concessions as to parking and excessive height, reduced setbacks and increased number of units conflict with the California Coastal Act, Local Coastal Plan, General Plan and Coastal Zoning Ordinance, and must be harmonized and may only be approved in a manner that is consistent with these authorities.

Coastal Act Section 30252, as incorporated into the County of Santa Barbara LUP, states:

The location and amount of new development should maintain and enhance public access

## Appeal of 6737 Sueno Road

to the coast by (1) facilitating the provision or extension of transit service, (2) providing commercial facilities within or adjoining residential development or in other areas that will minimize the use of coastal access roads, (3) providing non automobile circulation within the development, (4) providing adequate parking facilities or substitute means of serving the development with public transport, (5) assuring the potential for public transit for high intensity uses such as high-rise office buildings, and by (6) assuring that the recreational needs of new residents will not overload nearby coastal recreation areas by correlating the amount of development with local park acquisition and development plans with the provision of onsite recreational facilities to serve the new development.

The Project fails to “provide adequate parking facilities or public transportation to serve the needs of residents.” The parking, roadway and sidewalk conditions in Isla Vista are congested and at times blocked in a manner that obstructs access to the major transit stops. Parking-related congestion precludes public transit from operating with considerable frequency during events, emergencies, and other times. The failure to include adequate parking creates a conflict with the California Coastal Act due to the lack of adequate residential parking in Isla Vista that has caused dedicated coastal access parking spaces to be used for other purposes, thereby denying public access to the coast and conflicting with the California Coastal Act’s coastal access requirements.

The effect of high density projects on Isla Vista's parking supply and coastal access has been identified in other SBDL projects in Isla Vista and addressed in several ways. One project mitigated this through an automobile covenant restriction document and mandatory lease terms that limit tenants’ automobile use and ownership, which was adopted as a condition in all High Density Student Residentially zoned areas in IV. Coastal Commission Document Th7a-12-2012, LCP Amendment MAJ-1-12-B, incorporated into the County’s Coastal Zoning Ordinance § 35-77.6.5.d. While that provision applies to a different zone district, it applies with full vigor in this and other cases for projects proposed in the Medium Density Student Residential zone, and would be justified had the County sought to both reconcile Coastal Act and LCP policy requirements with the Project, and separately if the County properly complied with CEQA and conducted an environmental review process that recognized the project’s significant impacts to parking, coastal access, traffic and circulation, public health, safety and welfare, aesthetics, community character, noise, air pollution and other resources.

The County Board of Supervisors denied an IV project for lack of adequate parking in the Gerrity Garage Conversion project. 23APL-00032, Case No. 22CDP-00009, 10/17/2023.

Coastal Zoning Ordinance § 35-76.11 requires 2 parking spaces per bedroom, or at least 90 parking spaces for the revised 45 bedroom project. Project onsite parking is mandated to avoid further congesting Isla Vistas over parked streets to maintain an adequate supply of coastal access parking. Twenty Four (24) spaces for 45 bedrooms will result in at least sixty-six (66) additional cars parked on Isla Vista’s streets.

The Isla Vista Existing Conditions Assessment, Isla Vista Parking Study, 11/15/24, IVCSA, found that coastal access was limited and negatively impacted by insufficient parking in Isla Vista. Pp 1, 2. The IV Parking Study Action Plan includes a number of identified actions and

## Appeal of 6737 Sueno Road

strategies to address the issue, including a residential permit parking program (which would require County and Coastal Commission action) an IVCS D Parking Compliance program (to address cars parked illegally, for too long, and unsafe conditions) and working with landowners to provide car-share facilities. Lease restrictions are also an option 35-77.6.5.d.

The overarching goal of the Goleta Community Plan Public Facilities and Services Super Element is “To promote improvements in circulation, parking and other public facilities and services for commercial, industrial and residential areas for the benefit of the entire community.” GCP at 113. While the Eastern Goleta Valley Community Plan updated many areas of the General Plan, the Goleta Community Plan remains in effect in Isla Vista. The Goleta Community Plan identifies Isla Vista’s “severe parking shortage” as a “pressing land use issue”. GCP at p 40. Goleta Community Plan Policy CIRC-GV-8 requires that developers be encouraged to “pursue innovative measures to fully mitigate the transportation impacts associated with their projects.” Action CIRC-GV-8.1 requires the County Public Works Department to work with the development community and interested agencies [e.g., the IVCS D] “to identify incentives to encourage the use of innovative measures to reduce project related traffic impacts.”

The County has ignored the application of the Goleta Community Plan to the Project to the detriment of Isla Vista and the entire community. Isla Vista’s beaches, surf areas, coastal open spaces and coastal access do, in fact, serve the entire community, however that community-wide benefit is compromised by Isla Vista’s acute parking shortage and the onslaught of hundreds of new bedrooms from projects throughout Isla Vista.

### California Environmental Quality Act

The CEQA Exemption is not available because the project conflicts with the LCP, CZO and California Coastal Act policies for parking (see above), heights (CZO § 35-76-10 (25’ height limit), setbacks (35-76-8), bedroom density (35-76-7). The applicant and the County must make an effort to harmonize the proposed development with California Coastal Act requirements (including the Local Coastal Plan and Coastal Zoning Ordinance). The County failed to give adequate consideration to the impacts associated with these policies inconsistencies, particularly around parking and coastal access.

The Project conflicts with various Local Coastal Plan policies addressing the need for adequate public services and facilities, the requirement for additional lower income units, protection of cultural resources, inadequate stormwater facilities, excessive grading, failure to preserve the community’s character, roadway congestion and parking dysfunction. See, inter alia, LCP Policy 2-6. The County has ignored the LCP’s Isla Vista Development Policies and standards, including compliance with per-occupant bedroom size requirements. Many Isla Vista rental facilities, including some operated by the applicant, have as many as four occupants per bedroom, which thus must have 320 square feet per bedroom (240 square feet for triples). LCP Policy 2-22, et seq. The loss of existing affordable units must comply with LCP Policy 5-3. LCP Policy 2-12, which authorizes density reductions if warranted by conditions on the site, which in this case, is an abject parking conditions of Isla Vista. Policy 7-12A and its implementing actions require consideration of the project’s effect on peak use periods at Goleta beach. With at least two of Isla Vista’s coastal access facilities closed, the project will further

## Appeal of 6737 Sueno Road

exacerbate demand for trails. The LCP contemplated expansion of the Coastal Trail west of Isla Vista to El Capitan State Park, which is reasonably related to this and other cumulative projects' impacts, and mitigation in the form of funding for improved trail amenities is required.

Additionally, the CEQA Exemption is not available because the project will have cumulative impacts. To date there are now twenty-one proposed developments in Isla Vista, nine large ones (three to seven stories), three new single-family homes with an ADU, and nine additional ADUs. There have also been at least six ADUs built in the last two years bringing our total to twenty-seven new projects. This will create 428 additional bedrooms. The number of parking spaces being provided by all of these is 120. Coastal ordinance requires 2 parking spaces per bedroom for a total of 856 spaces. At a minimum we will be 736 spaces short. At the moment there are 2,772 on street parking spaces in Isla Vista, with 257 being removed for the daylighting law and future Public Works projects we will be left with 2,515. The studies show we are already over 100% capacity. The 736 additional cars represent a 29% increase and thus will both worsen parking congestion in Isla Vista and worsen coastal access by creating overwhelming competition for coastal access parking. The Project must undergo CEQA's environmental review process.

### Findings Cannot be Made

The Planning Commission should not have made the findings for this project approval. The Planning Commission abused their discretion. Looking at G.C 66589.5 of the HAA the Project will have direct, significant and unavoidable impacts. What would normally require 90 spaces is only providing 24 parking spaces, this is a quantifiable difference. The additional cars will have to be parked somewhere the addition of these cars parking in a neighborhood that already exceeds existing capacity will be detrimental to the comfort, convenience, general welfare, health safety of the neighborhood. A number of the SBAR members expressly stated that the Project was incompatible with surrounding development and the neighborhood. Parking congestion has demonstrably compromised first responder access, and parked cars routinely jeopardize public safety by parking in red zones and occluding sight lines, parking on sidewalks, in front of fire hydrants, and in handicap zones.

Looking at Public Resource Code § 21159.25 that exempts projects from CEQA we believe adverse impacts regarding significant impacts to transportation were not mitigated to the maximum extent possible. The applicant should make the maximum effort to ameliorate significant traffic problems.

Given the lack of parking and consequent unsafe parking behavior at times, the findings that streets and roads are adequate cannot be made; and that police and fire services are adequate for the project.

Further, the Planning Commission lacked evidence to make findings of compatibility with the Goleta Community Plan, the Local Coastal Plan, the Coastal Zoning Ordinance.

We will identify and submit information and argument concerning additional issues as this review unfolds.

Appeal of 6737 Sueno Road

Sincerely,

Pegeen and Jon Soutar,

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