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de la Guerra, Sheila

From: Miyasato, Mona
Sent: Monday, April 8, 2019 5:33 PM
To: sbcob; Alexander, Jacquelyne
Subject: FW: City of Goleta Comment Letter on Hoop Structure Ordinance and DEIR
Attachments: 2019 4 COG Ltr to County BOS re Hoop_.pdf

From: Peter Imhof <pimhof@cityofgoleta.org>
Sent: Monday, April 8, 2019 5:00 PM
To: County Executive Office <caoemail@co.santa-barbara.ca.us>
Cc: Klemann, Daniel <dklemann@co.santa-barbara.ca.us>
Subject: City of Goleta Comment Letter on Hoop Structure Ordinance and DEIR

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To the Clerk of the Board:

Attached please find the City of Goleta's comment letter for the hoop structure ordinance item on tomorrow's BoS agenda. Please distribute to the Chair and Supervisors.

Thanks,

Peter T. Imhof
Director, Planning & Environmental Review Department
City of Goleta
130 Cremona Drive, Suite B
Goleta, California 93117
(805) 961-7541



April 8, 2019

CITY COUNCIL

Paula Perotte
Mayor

Kyle Richards
Mayor Pro Tempore

Roger S. Aceves
Councilmember

Stuart Kasdin
Councilmember

James Kyriaco
Councilmember

CITY MANAGER
Michelle Greene

Board of Supervisors
Attn. Steve Lavagnino
Santa Barbara County
105 E. Anapamu Street
Santa Barbara 93101

RE: Case No. 17ORD-00000-00005, Hoop Structures Ordinance Amendment and Draft Program Environmental Impact Report

Honorable Chair Lavagnino and Supervisors:

In March 2018, the City of Goleta (City) submitted comments to the County voicing its concerns regarding this proposed ordinance project and the associated draft Environmental Impact Report. Unfortunately, the City's concerns do not appear to have been adequately addressed by the Planning Commission.

The development of hoop structures within the unincorporated area of the County surrounding the City has the potential to create visual impacts that will affect the City. The limited restrictions proposed by the County for addressing the visual impacts of these structures within agriculturally zoned areas fail to provide adequate protection against these impacts. Agricultural districts in the County abut the City, in many instances directly adjacent to existing residential neighborhoods. Furthermore, hoop structures are a common form of development for the cultivation of cannabis. The City continues to have significant concerns related to compatibility issues, where cannabis cultivation abuts or is in close proximity to the urban-rural interface without sufficient protections for established residential neighborhoods.

As currently written, the County's draft ordinance only considers protections for urban townships in the unincorporated County, while completely ignoring potential impacts to incorporated areas throughout Santa Barbara County. The draft EIR (Comment letter 2, 9-5) dismisses the City's concerns with the following note implying that scenic views from the City and unincorporated urban areas are not

worthy of protection because they do not have the “sense of place and community identity” of non-urban unincorporated areas:

The EIR appropriately analyzes potential visual impacts to the many small townships throughout unincorporated Santa Barbara County. These communities have well defined stable boundaries, which provide a physical and visual separation between townships and adjacent open lands and working agricultural land. These communities have developed a distinct sense of place and community identity that is unique to the rural aesthetic and character of the County unincorporated areas. These visual characteristics are not present or applicable to other incorporated and unincorporated urban areas within Santa Barbara County. Therefore, the impact analysis and associated mitigation (MM-VIS 2) appropriately analyzes potential visual character impacts to select small urban townships within the unincorporated areas of Santa Barbara County. [Emphasis added]

The EIR also concludes that the City’s comments “pertain[] to the merits of the project, rather than the adequacy of the EIR.”

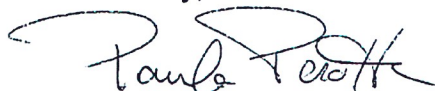
The County’s analysis is conclusory and without factual basis. The City has a clear urban boundary, which is surrounded on multiple sides by unincorporated, rural agricultural lands. Views of these agricultural lands and the mountains behind them are visible throughout the City, are highly valued by Goleta residents and visitors, and are integral to the identity of the City.

Protections for Visual Impacts: Visual protections given to rural areas should apply equally to boundaries with incorporated and unincorporated urban areas, including the City. Agricultural lands within the south-facing foothill region of the Santa Ynez Mountains are a visual resource whose value is difficult to overstate and which should receive the same visual protections and strict development constraints applied to the construction of new homes. Proliferation of hoop structures and other covered structures on our majestic foothills would dramatically change and negatively impact the semi-rural character of the entire South Coast of Santa Barbara County and directly and adversely impact the City.

Permit Path Must Include Minimum Notice and Process Safeguards: All existing permit requirements (i.e., Land Use Permit, Development Plan) should remain applicable to hoop structures and any exemption from permit requirements should only be for structures that are not visible in any way from any public viewing area, including roadways, bikeways, trails, parks, and the ocean. Hoop structures within the public’s view should be subject to a zoning review and approval process which requires and allows public noticing and involvement. The proposed Exemption and Zoning Clearance paths both rob the public of important protections.

Thank you for considering the City's comments and address its concerns. Please feel free to contact our Planning and Environmental Review Director Peter Imhof by email at pimhof@cityofgoleta.org or by phone at 805.961.7541, if you would like to discuss our comments.

Sincerely,

A handwritten signature in black ink that reads "Paula Perotte". The signature is fluid and cursive, with a large, stylized initial "P" that loops back.

Paula Perotte
City of Goleta Mayor

cc: Kyle Richards, City of Goleta Mayor Pro Tempore
Roger S. Aceves, City of Goleta Councilmember
James Kyriaco, City of Goleta Councilmember
Stuart Kasdin, City of Goleta Councilmember
Michelle Greene, Goleta City Manager
Peter Imhof, Director, Planning and Environmental Review Department