

**COUNTY OF SANTA BARBARA
PLANNING AND DEVELOPMENT DEPARTMENT**

MEMORANDUM

TO: Santa Barbara County Planning Commission

FROM: Nathan Eady, Planner II
Development Review Division

HEARING DATE: November 14, 2007

SUBJECT: Consideration of Request to Initiate the Gaffaney General Plan Amendment
Case No. 06GPA-00000-00015

1.0 REQUEST

Request of Dave Cross of Fletcher, Cross, & Associates on the behalf of eight property owners to initiate a General Plan Amendment for approximately 178 acres from Residential Ranchette (RR), with a mixture of 20-acre and 10-acre minimum parcel size, to a new Comprehensive Plan designation of Residential Ranchette (RR) with a uniform 5-acre minimum parcel size.

2.0 RECOMMENDATION

The Planning Commission should decline to initiate the General Plan Amendment request and instead recommend that all similar projects in this region of the County be considered within the context of a greater Area Study performed in the Lompoc/Mission Hills/Vandenberg Village region.

3.0 PROJECT DESCRIPTION

The applicant proposes a project whose boundaries includes 9 lots with a total area of 178 acres, and lies on either side of Tularosa Road where it becomes a private road, north of La Purisima Golf Course, approximately three miles east of the City of Lompoc (see Figures 1 & 2 on Pages 2 & 3).

General Plan Amendments may be initiated at the staff level when the request is minor in nature. If the request is not minor in nature, the request for initiation must be referred to the Planning Commission or Board of Supervisors. In this particular instance, the applicant proposes to change the land use designation to RR-5, increasing the potential

density in this portion of an Existing Developed Rural Neighborhood (EDRN) from 13 units to 35 units (see Table 1 on Page 4). Due to the conflict with the purpose of EDRN's and due to the precedent this project could set, the request is not minor in nature. The decision as to whether to accept the application and initiate the formal review process has therefore been elevated to the Planning Commission.

Figure 1
Lompoc Area (from County Base Map)
Gaffaney Site highlighted

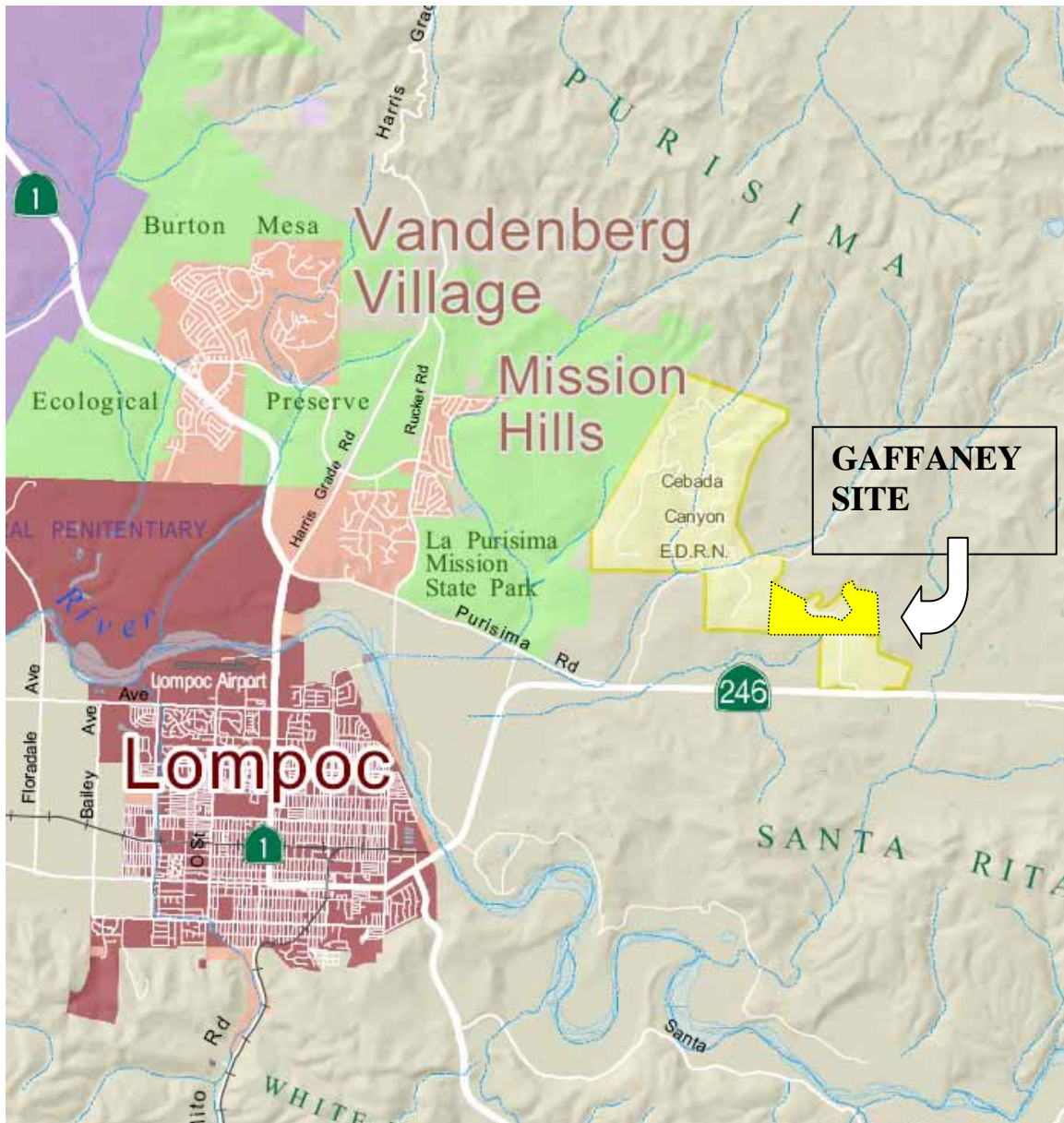


Figure 2
Aerial Photo of Project Site
with Project Boundaries



**Table 1
Increased Density Analysis**

APN	Parcel Acreage	Existing Land Use Designation	Units allowed - Existing Designation	Proposed Land Use Designation	Units allowed - Proposed Designation
099-650-001	20	RR-20	1	RR-5	4
099-650-002	16.7	RR-10	1	RR-5	3
099-650-003	20	RR-20	1	RR-5	4
099-650-004	10.3	RR-10	1	RR-5	2
099-650-005	11.1	RR-10	1	RR-5	2
099-650-010	10	RR-10	1	RR-5	2
099-650-011	10	RR-10	1	RR-5	2
099-650-012	40	RR-10	4	RR-5	8
099-650-013	40	RR-20	2	RR-5	8
Total	178.1		13		35

4.0 POLICY CONTEXT

Existing Developed Rural Neighborhoods

An Existing Developed Rural Neighborhood (EDRN) is a neighborhood located in a designated rural area that historically developed at a greater density than the surrounding rural or inner rural lands. The purpose of the neighborhood boundary is to keep pockets of rural residential development from expanding onto adjacent agricultural lands. In essence the EDRN designation was created to recognize existing development patterns that do not fit neatly into the urban/rural boundaries because they pre-dated such designations. The EDRN designation is a planning tool designed to grant densities to these areas which they would not otherwise have obtained through the Comprehensive Planning process, and helps land owners avoid the many problems that would occur if their lot sizes were non-conforming. Although the residential use is higher in density than other rural land uses, the EDRN designation acknowledges an existing pattern of development, and an established way of life.

The Land Use Element provides the following direction for EDRN's:

“Within the Rural Neighborhood boundary, infilling of parcels at densities specified on the land use map is permitted. Areas shown on the County Comprehensive Plan Map as existing neighborhoods in rural areas shall retain their existing zoning.” (p. 175-176)

Several Land Use Element policies direct future growth to urban areas, and stipulate that increased densities outside urban areas should only occur after areas designated for

growth are filled-in, and only after consideration of a broader community plan or area plan revision or update.

Urban/Rural Development Boundary

Currently the Urban/Rural boundary defines the eastern edge of the Mesa Oaks and Mission Hills areas, approximately 2.5 miles west of the subject site. This boundary is more than a mile west of any property within this EDRN. This Urban/Rural Boundary represents the maximum extent of the Lompoc urban area and policies dictate that the boundary shall not be extended until existing inventories of vacant land within the urban area are nearing build out. Urban/Rural boundary adjustments are only approved as part of a Community Plan update.

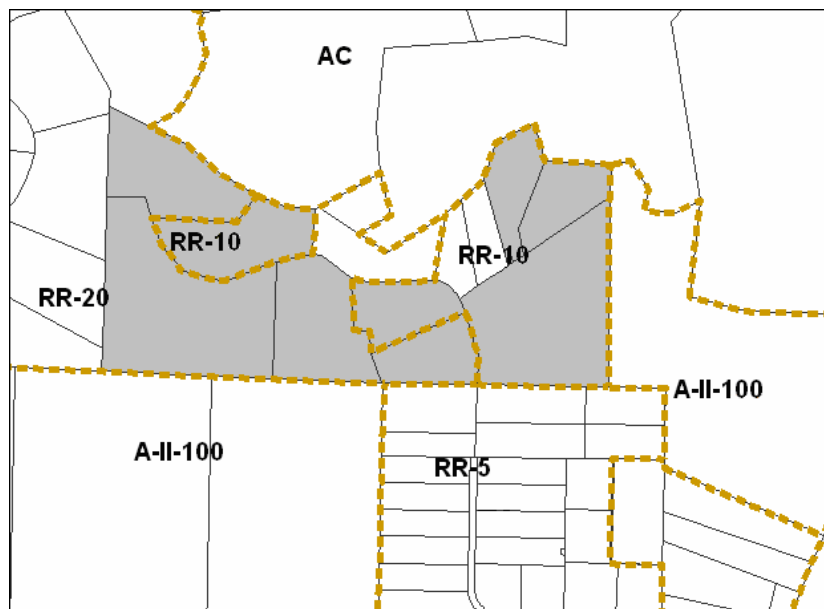
Comprehensive Plan

The Comprehensive Plan for this area has not been updated since 1980. In recent Planning Commission deliberations regarding two other proposed General Plan Amendments in the Lompoc area, both Commissioners and members of the public expressed a preference for an area-wide Community Plan instead of processing General Plan Amendments on a piecemeal basis.

Surrounding Land Uses

As can be seen in Figure 3 below, the site is surrounded by lands designated as Agriculture (either A-II, A-II-100, or AC). The Neighborhood is mostly designated RR-20, with a handful of RR-10 lots. Additional parcels located to the South of this proposal, which are also part of the EDRN, have a designation of RR-5.

Figure 3
Surrounding Land Use Designations (Gaffaney site shaded)



Growth Inducement within an EDRN

While this request involves 9 lots, and a total potential of 22 additional units, the entire EDRN includes an additional 62 properties accessed by Cebada Canyon Road that are not a part of this application. It is important to take note of these parcels at this time because of the precedent this case would create. Of these additional lots, to the west and northwest of the subject proposal, all but two are over 20 acres. At the proposed one unit per five acre density, these lots would yield 192 additional units of development potential within this EDRN. Such an increase in development potential would seriously compromise the integrity of the urban/rural boundary. Figure 4 on page 7 shows the existing EDRN's located within the County. There are more than 40 EDRN's throughout the County which represent a combined acreage of 23,500 acres. It should also be noted that the Ord. 661 Consistency Rezoning project of the eastern Santa Maria valley has recently created five new EDRN designations. This approach is being considered a viable tool based on the success the EDRN policies have had in the past in containing developed areas from intensifying or spreading inappropriately onto rural and agricultural lands.

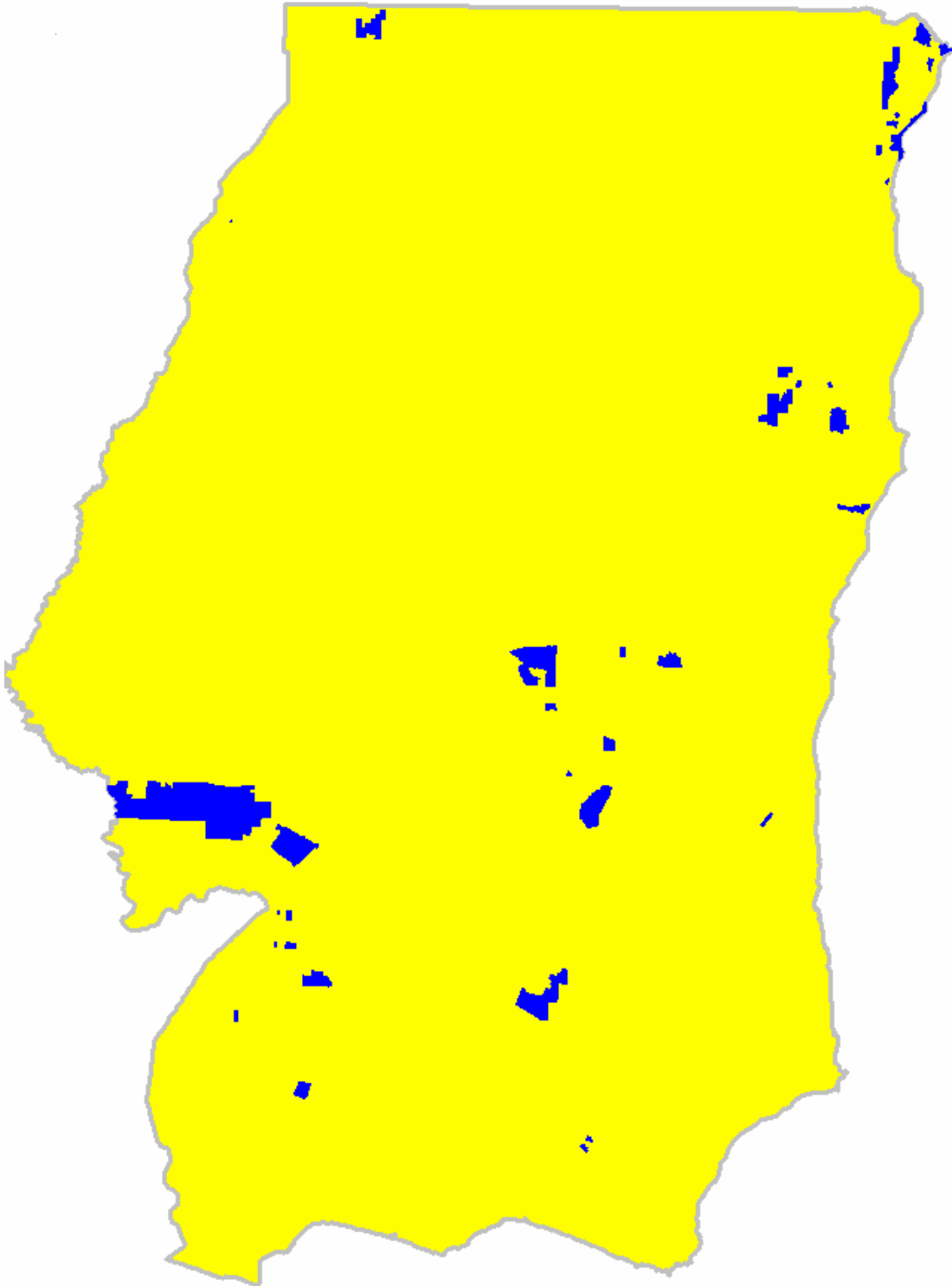
Resource Issues

Prior to approving any application for increased density, the County needs to make findings related to the adequacy of public services such as water and sewer, fire hazard assessments, water quality, environmental and habitat protection, resource allocation, and the potential for visual impacts. While project specific analysis would certainly be done if this proposal goes forward, the analysis of these and other issues goes beyond site specific issues, and could affect the community character. Discussion of these issues, therefore, should be undertaken as part of an Area Study, followed by a Community Plan update for the greater Lompoc/Mission Hills/Vandenberg Village area.

Community Benefits

Finally, the Lompoc Area Goals Interpretive Guidelines (1999) state that projects involving rezones (which would result if this proposal is initiated) shall provide community benefits as appropriate and feasible. As noted in the Guidelines, rezone projects are expected to dedicate land for and construct active recreational features, dedicate open space to preserve natural features, or provide affordable housing. While some natural features, such as oak groves on this site, could be integrated into open space area(s) and preserved, the extent of development throughout the EDRN makes it more likely that existing habitat areas would be impacted by future development. It is also questionable whether this area would be an appropriate location for affordable housing. Without the incorporation of recreational amenities, significant open space area(s), or affordable housing opportunities, it is difficult to envision community benefits that would be commensurate with the amount of development potential being requested.

Figure 4
County-wide EDRN Map



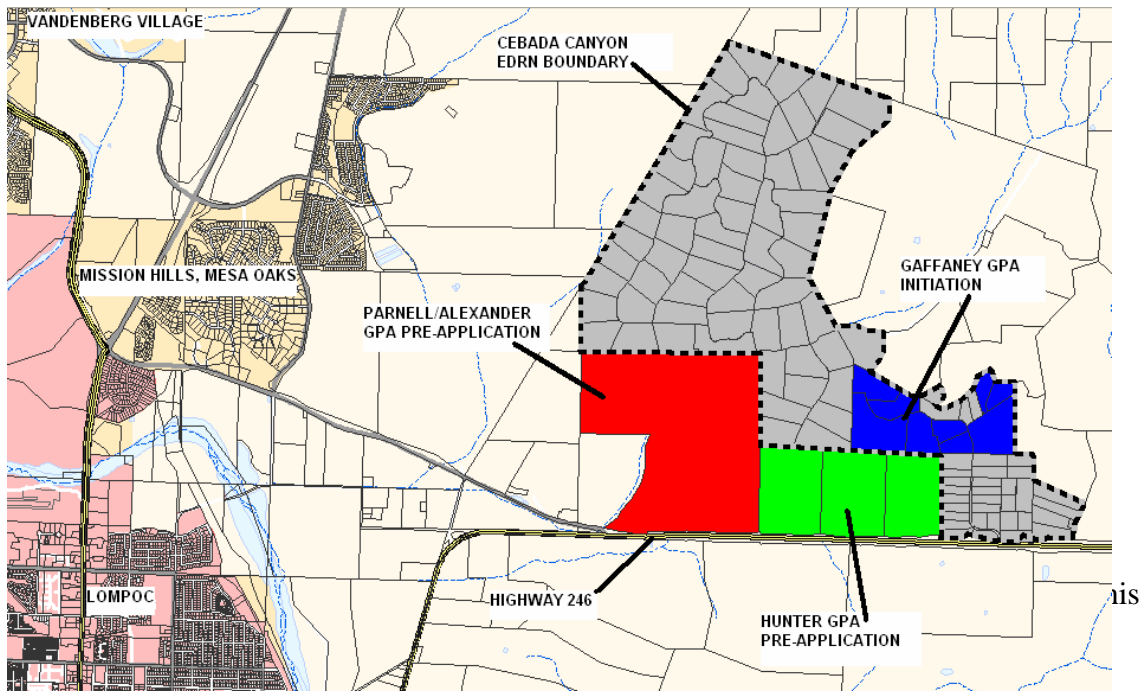
5.0 CONCLUSION

When applications for General Plan Amendments and Rezones are submitted to the County, they must be formally initiated prior to consideration of normal processing. Staff must be able to recommend initiation of the GPA to the decision-maker based on the ability to make certain findings. Specifically, staff must be able to make the finding that the amendment to the General Plan is “in the public interest” based on a comparison of the potential development under the current designation (in this case, RR-10 and RR-20) and the proposed designation (RR-5). There must also be a substantial public benefit derived from the amendment.

By definition, the Land Use Element provides that Existing Developed Rural Neighborhoods shall retain their existing zoning. The EDRN designation was established to benefit existing developed areas, and not as a way to allow their further development.

Additionally, going forward with a General Plan Amendment in a Neighborhood as extensive as this one involves consideration of the area’s location in relation to the Urban/Rural boundary, how and when the intervening properties may be developed, how the proposal would affect the surrounding areas, and whether the timing of the development is appropriate. This request for initiation has been brought to the Planning Commission because the community-wide impacts are better addressed in the context of an Area Study and comprehensive community plan update. This region of the County is experiencing noticeable development pressure and there are currently two other significant Pre-Applications being conceptually reviewed by Staff (see Figure 5 below); these projects propose further development within the Cebada Canyon area.

Figure 5
Cebada Canyon Project Map



Cebada Canyon Rural Neighborhood could pursue similar applications. The implications for other EDRNs are also evident. There are more than 40 existing EDRNs throughout the county which vary in size from 1 acre to over 10,000 acres. Taking an action which allows increased development potential within EDRNs could therefore create the potential for several hundred additional residential units to be placed throughout rural areas of the County.

This proposal asks for an increase of residential density within an Existing Developed Rural Neighborhoods; the granting of that request could result in a major change to County policy. It is both Development Review and Long Range Planning staff's recommendation that case by case determinations, in regards to intensification of uses within EDRNs, not be permitted without a full discussion on the policy itself. As to the specifics of this request, it is recommended that the initiation not be allowed to proceed prior to completion of an Area Study which evaluates the development potential both in Urban and Rural areas of the greater Lompoc/Mission Hills/Vandenberg Village area. This Area Study would serve as a precursor for the eventual processing of a Community Plan which would encompass this portion of the County where development pressures are evident.

Staff therefore recommends that the Planning Commission not initiate the General Plan Amendment request. If the Commission believes that the proposed General Plan Amendment project has merit and should be processed independent of an Area Study, the Commission could direct staff to initiate the formal review process. If the Amendment is initiated, the applicant should be directed to apply for the appropriate rezoning and Tentative Subdivision Maps to allow for the project to be appropriately assessed. The Commission may also consider deferring this issue to the Board of Supervisors.