

CALIFORNIA COASTAL COMMISSION

CENTRAL COAST DISTRICT OFFICE
725 FRONT STREET, SUITE 300
SANTA CRUZ, CA 95060
PHONE: (831) 427-4863
FAX: (831) 427-4877
WEB: WWW.COASTAL.CA.GOV



[Click here to go to
original staff report](#)

F11a

Prepared December 9, 2015 for December 11, 2015 Hearing

To: Commissioners and Interested Persons
From: Susan Craig, Central Coast District Manager
Kevin Kahn, Central Coast District Supervisor
Subject: **STAFF REPORT ADDENDUM for F11a (Warehousing)**

The purpose of this addendum is to respond to recent correspondence received from warehousing interests in San Luis Obispo County (attached, and to be added as “Exhibit 2: Correspondence” to the staff report dated prepared November 20, 2015) asking that this matter be postponed to a future date (see attached correspondence from Jeff Edwards). Staff is not supportive of a postponement, and offers the following explanation.

As described on page 2 of the staff report, this LCP amendment was previously heard at the Commission’s July 2015 hearing in Ventura. At that time, and in response to testimony from warehousing interests, the Commission voted to extend its action deadline by one year, and some Commissioners expressed a desire for the County to undertake additional engagement and outreach on the proposed amendment with affected members of the public before the item was brought back to the Commission. Some Commissioners also expressed interest in having County staff present the next time this amendment, or other County LCP amendments, were before the Commission. Immediately following the July hearing, staff sent the attached letter, dated July 9, 2015, to the County to explain what had happened at the hearing, and to identify for the County these Commissioner observations.

Since that time, the County indicated that they engaged with warehousing interests, and also brought the amendment forward to two local advisory councils that have active warehousing facility interest (i.e., the Los Osos Community Advisory Council and the North Coast Advisory Council) for additional discussion. The County further indicated that neither Council voiced interest in additional dialogue on the warehousing amendment, stating that, that in the Councils’ opinion, the amendment had already been thoroughly vetted, including through the Planning Commission and Board of Supervisor processes. Based on all of this, the County indicated to Commission staff that it did not intend to conduct any more outreach on this item, and asked that it be brought back before the Commission as soon as possible at the December hearing. See attached correspondence from the County.

The crux of the issue is that some warehousing interests have argued that instead of disallowing warehouse facilities in the Residential Multi-Family land use category, it would be more

LCP-3-SLO-15-0013-1 Part D (Warehousing) ADDENDUM

appropriate to identify standards that could be applied to such facilities in order to address potential issues that might arise. The County Planning Commission originally took this tact, but the Board of Supervisors ultimately decided that eliminating warehousing as an allowable use in this particular designation better met San Luis Obispo County goals and objectives. In Commission staff's view, it is likely that either approach could probably be found Coastal Act consistent. However, County staff's view is that the final Board-approved version that was submitted to the Commission for approval is what the County wants and supports, and staff understands that perspective. Most importantly, as indicated in the staff report, Commission staff believes that the Board-approved proposal does not raise significant coastal resource concerns, and that the LCP amendment should be approved as submitted. Unless the Commission finds differently, staff does not believe that a postponement or additional use of staff time is warranted on this proposal.

From: Kahn, Kevin@Coastal
To: "Jeff Edwards"
Cc: Carl, Dan@Coastal; Craig, Susan@Coastal
Subject: RE: F11a
Date: Wednesday, December 09, 2015 9:41:37 AM

Hi Jeff, as I discussed on the phone with you and Elizabeth Watson yesterday, because the County has indicated that they do not intend to do additional public outreach on this matter and has requested that the item be placed on this December agenda, and since this hearing is a relatively local Central Coast hearing, and because the item has been properly noticed, including having the staff report distributed three weeks ago, Commission staff believes that Friday is an opportune time to bring the amendment forward to the Commission. We will be distributing an addendum for the Commissioners that summarizes the County's outreach since the July hearing and why this hearing in an appropriate time to reconsider this LCP amendment. I will forward you a copy of that as soon as it is finalized.

Please don't hesitate to contact me with any other questions.

Thanks,
Kevin

Kevin Kahn
District Supervisor
Central Coast District Office
California Coastal Commission
725 Front Street, Suite 300
Santa Cruz, CA 95060
(831) 427-4863

From: Jeff Edwards [mailto:jhedwardscompany@gmail.com]
Sent: Wednesday, December 09, 2015 6:25 AM
To: Kahn, Kevin@Coastal
Cc: Carl, Dan@Coastal
Subject: F11a

Hi Kevin,

Yesterday we spoke in connection with the above referenced item. I requested a postponement of the item to be considered by the CCC, on Friday, December 11. I first requested a postponement when I spoke to you on Monday, November 30. The lack of notice and the failure of the County to engage interested parties it has disadvantaged my client and others in participating in the public discussion about the item. Yesterday I asked you to send me an email indicating the postponement was not possible. Perhaps you got busy, but so far I have not received that email, hence this follow up.

Please respond accordingly and do not hesitate to contact me if you have any questions.

Thanks,
Jeff

Julie Tacker

Administrative Assistant

J.H. Edwards Company
P.O. Box 6070
Los Osos, CA 93412
805.235.0873 - Jeff
805.235-8262 - Julie
805-528-3569 - Office

CALIFORNIA COASTAL COMMISSION

CENTRAL COAST DISTRICT OFFICE
725 FRONT STREET, SUITE 300
SANTA CRUZ, CA 95060
PHONE: (831) 427-4863
FAX: (831) 427-4877
WEB: WWW.COASTAL.CA.GOV



July 9, 2015

James Bergman, Director
San Luis Obispo County Planning and Building Department
976 Osos Street, Room 200
San Luis Obispo, CA 93408

**Subject: San Luis Obispo County LCP Amendment Number LCP-3-SLO-15-0013-1 Part D
(Warehousing)**

Dear Mr. Bergman:

Please note that on July 8, 2015, the California Coastal Commission did not approve the above-referenced proposed LCP amendment, and instead took action to extend the deadline for the Commission's action on this proposed LCP amendment by one year. The new action deadline is now September 14, 2016.

At the July 8th hearing the Commission took testimony from several members of the public who indicated that they would be adversely affected by the proposed change (to eliminate warehousing as an allowed use in the residential multi-family land use designation), and who requested that the proposed prohibition be re-thought, including in terms of applying standards to the use as opposed to prohibiting the use, as apparently was the County Planning Commission's recommendation on this matter. Commissioner comments were sympathetic to the issues raised by commenters, and ultimately the Commission extended the action deadline by one year to allow your office time to consider their input and potentially to reconsider the manner in which warehousing is addressed within the residential multi-family land use designation.

I write today to request that you engage with these stakeholders, and any other relevant and interested parties, to explore whether there may be a different approach to address the issues identified. We believe that either approach (appropriate standards for the use or prohibition, and other permutations on these two as well) could likely be found Coastal Act consistent, and we are hopeful that you can come up with an approach that addresses relevant concerns and that can resolve the issues raised to the Commission on July 8th in a way that all affected parties can support. We do not intend to reschedule this matter for Commission consideration until after you have engaged in this way and we hear back from your office on the results of that engagement. We also strongly encourage your staff to attend the next Commission meeting when this is agendaized (and all Commission hearings when County items are being considered), as your lack of participation on July 8th was also called out as problematic in Commissioner comments.

If you have any questions or would like to discuss this matter further, please don't hesitate to contact me or Kevin Kahn, the Central Coast District Supervisor who was handling this proposed County LCP amendment, at the address and phone number on the front page.

Sincerely,

Dan Carl, Director
Central Coast District Office
California Coastal Commission

cc: Jeff Edwards, J. H. Edwards Company

From: jbergman@co.slo.ca.us
To: Kahn_Kevin@Coastal
Cc: jjohnson@co.slo.ca.us
Subject: Re: FW: Dec. 2015 agenda item #F3. 1 SLO County LCP amendment
Date: Friday, December 04, 2015 3:27:08 PM

Kevin,

Thank you for the correspondence. Your understanding is correct although I might refine it by saying that Mr. Edwards was an active participant in hearings at the Planning Commission and the Board of Supervisors. In the end, his argument did not prevail with the Board. As such, I do not intend any further outreach to Mr. Edwards.

Thank you,

Jim

James A. Bergman
Director



976 Osos Street, Room 300
San Luis Obispo, Ca. 93408
805-781-5708

<http://www.sloplanning.org>
<http://www.facebook.com/SLOPLanning>
<http://twitter.com/SLOCoPlanning>

From: "Kahn, Kevin@Coastal" <Kevin.Kahn@coastal.ca.gov>
To: "jbergman@co.slo.ca.us" <jbergman@co.slo.ca.us>,
Date: 12/04/2015 10:21 AM
Subject: FW: Dec. 2015 agenda item #F3. 1 SLO County LCP amendment

Hi Jim, I'm forwarding an email I sent to Jay, but I received a response email that he was out of the office. Wanted to send this your way.

Please let me know if any questions.

Thanks!

Kevin

Kevin Kahn
District Supervisor
Central Coast District Office
California Coastal Commission
725 Front Street, Suite 300
Santa Cruz, CA 95060
(831) 427-4863

From: Kahn, Kevin@Coastal
Sent: Tuesday, December 01, 2015 9:45 AM
To: jgjohnson@co.slo.ca.us
Subject: FW: Dec. 2015 agenda item #F3. 1 SLO County LCP amendment

Hi Jay, I'm forwarding you an email from Jeff Edwards on the warehousing/mini-storage amendment. We're going to respond to this via an addendum before the hearing. It's our understanding, including from discussions and emails from you and Jim, that: a) the County did all additional outreach you were going to do (including meeting with Mr. Edwards); b) you didn't intend to do any more, c) you don't intend to change your proposal, and d) you want this heard in December. If you could send a quick email/letter stating as much, that would be great.

I'll be out of the office for the next few days at staff training, but please feel free to send it over at your convenience.

Thanks!
Kevin

Kevin Kahn
District Supervisor
Central Coast District Office
California Coastal Commission
725 Front Street, Suite 300
Santa Cruz, CA 95060
(831) 427-4863

From: Jeff Edwards [<mailto:jhedwardscompany@gmail.com>]
Sent: Monday, November 30, 2015 5:05 PM
To: Kahn, Kevin@Coastal
Subject: Re: Dec. 2015 agenda item #F3. 1 SLO County LCP amendment

Hi Kevin,

This is surprising to me. I spoke to Jay Johnson, of the County, who is handling the matter, maybe one week ago, and he indicated this amendment was not a priority and that he was going to work on it early next year (i.e. 2016). Is this some kind of "Head Fake?" Because I don't appreciate it; where ever it came from. I can tell you the matter HAS NOT been considered by the Oceano Community Advisory Committee, who had an interest in it, nor the Los Osos Community Advisory Council, who also expressed an opinion last go around. I cannot speak to the North Coast Advisory Committee, but my guess is, they haven't taken it up either.

Also, having this considered at Christmastime is offensive. Nobody I know that was involved in the July hearing in Ventura has been approached or even know about the

December hearing. The county was going to send a notice to all properties affected, having compiled a list of interested parties. Zero outreach has taken place.

Please provide any and all correspondence from the county, or others, in connection with this matter.

I don't know what or who at the county told you anything about this, but in the intervening five months, they have done virtually nothing.

I appreciate your assistance in postponing the matter until the outreach is done, as the commission directed.

Please feel free to contact me.

Jeff

Julie Tacker
Administrative Assistant
J.H. Edwards Company
P.O. Box 6070
Los Osos, CA 93412
805.235.0873 - Jeff
805.235-8262 - Julie
805-528-3569 - Office

On Mon, Nov 30, 2015 at 4:51 PM, Kahn, Kevin@Coastal <Kevin.Kahn@coastal.ca.gov> wrote:

Hi Jeff, I hope you had a nice Thanksgiving as well.

The County indicated to us that they undertook additional public outreach on this amendment (including discussions at the Los Osos and North Coast advisory councils) as requested by the Commission, and that, after and as a result of these discussions, decided to retain the amendment as it was originally proposed. They also indicated that they would like to move forward on the amendment at the Commission's December hearing. That is why it is on for December.

Let me know if any other questions.

Thanks!

Kevin

Kevin Kahn
District Supervisor
Central Coast District Office
California Coastal Commission
725 Front Street, Suite 300
Santa Cruz, CA 95060
[\(831\) 427-4863](tel:(831)427-4863)

From: Jeff Edwards [<mailto:jhedwardscompany@gmail.com>]

Sent: Thursday, November 26, 2015 7:40 AM

To: Kahn, Kevin@Coastal

Subject: Dec. 2015 agenda item #F3. 1 SLO County LCP amendment

Hi Kevin,

This matter was considered in Ventura back in July. Having recently spoken with a SLO

County staff person; they are still working on an outreach program. How did this get back on an agenda?

Please advise at your earliest convenience.

Hope you have a nice Thanksgiving.

Thanks,

Jeff

Julie Tacker

Administrative Assistant

J.H. Edwards Company

P.O. Box 6070

Los Osos, CA 93412

[805.235.0873](tel:805.235.0873) - Jeff

[805.235-8262](tel:805.235-8262) - Julie

[805-528-3569](tel:805-528-3569) - Office

From: jjohnson@co.slo.ca.us
To: Kahn, Kevin@Coastal
Subject: SLO County LCP Amendment re: Warehousing
Date: Thursday, November 19, 2015 9:28:42 AM

Kevin,

In response to Commission concerns for additional outreach, we engaged the two Advisory Councils that have active applications for new mini-storage warehouse facilities in their advisory areas (in the coastal communities of Los Osos and San Simeon). On October 22, 2015, County staff attended the Los Osos Community Advisory Council meeting and they expressed no interest in additional outreach on this item. Likewise, on November 18, 2015, County staff attended the North Coast Advisory Council (covering the communities of Cambria and San Simeon) and they too expressed no interest in additional outreach on this item. Also, it is worth noting, we sent public hearing notices to all RMF property owners with sites large enough to have a mini-storage facilities, all current mini-storage property owners, and to both of the current applicants for new mini-storages. Interested parties did participate in the County's public hearing process.

County staff will attend the December Commission hearing to be available to answer any questions.

Please let me know if you need additional information.

Sincerely,

Jay Johnson

CALIFORNIA COASTAL COMMISSION

CENTRAL COAST DISTRICT OFFICE
725 FRONT STREET, SUITE 300
SANTA CRUZ, CA 95060
PHONE: (831) 427-4863
FAX: (831) 427-4877
WEB: WWW.COASTAL.CA.GOV



F11a

Prepared November 20, 2015 for December 11, 2015 Hearing

To: Commissioners and Interested Persons

From: Susan Craig, Central Coast District Manager
Kevin Kahn, Central Coast District Supervisor

Subject: San Luis Obispo County LCP Amendment Number LCP-3-SLO-15-0013-1 Part D (Warehousing)

SUMMARY OF STAFF RECOMMENDATION

San Luis Obispo County proposes to amend the Land Use Plan (LUP) and Implementation Plan (IP) components of its certified Local Coastal Program (LCP) by deleting “warehousing” as an allowable land use within the LCP’s Residential Multi-Family land use category.¹ Specifically, the amendment would modify Table O (the LCP’s table of allowed land uses for each of the coastal zone’s thirteen land use designations²) of the LUP’s Framework for Planning document by deleting warehousing as a special use (i.e., a conditional/appealable use allowed in a particular land use category subject to special standards) in Residential Multi-Family designations, and would amend the IP by deleting a reference to the required standards that currently apply to such warehousing facilities in these areas. According to the County, the primary impetus behind the amendment is to lessen the competition between housing and other uses in these areas and to therefore maximize housing opportunities in these areas, which tend to be located within existing developed communities near services and transit where such higher density residential development should be encouraged.

The Coastal Act considers general industrial and commercial uses, such as warehousing facilities, a lower priority land use, and encourages the provision of affordable housing, which often times is accommodated via multi-family housing developments. The proposed amendment would remove a potential barrier to the provision of affordable housing by no longer allowing this lower priority Coastal Act general commercial/industrial use within the Residential Multi-Family land use designation. Prohibiting additional warehousing facilities may also help to protect visual resources and community character by keeping these areas residential as opposed to allowing warehousing facilities.

¹ Because the only allowable type of warehousing facilities within Residential Multi-Family areas under the LCP are mini-storage facilities, the proposed amendment would thus disallow mini-storage use and development.

² The San Luis Obispo County LCP does not have zoning designations, but instead solely land use designations.

LCP-3-SLO-15-0013-1 Part D (Warehousing)

It should be noted that the Commission first heard this LCP amendment at its July 2015 hearing in Ventura. At that time, and in response to testimony from warehousing interests, the Commission extended its deadline to act on the amendment by one year, and expressed a desire for the County to undertake additional engagement and discussion with affected members of the public, and to potentially reconsider the manner in which warehousing is addressed within this particular land use designation. Since that time, in response to Commission concerns for additional outreach, the County engaged with the two local advisory councils that have active applications for new warehouse facilities in their advisory areas (in the coastal communities of Los Osos and San Simeon). According to the County, neither council (i.e., the Los Osos Community Advisory Council and the North Coast Advisory Council) expressed interest in additional discussion on this issue. The County believes that the proposed amendment was appropriately vetted during the local process, including at both the Planning Commission and Board of Supervisors levels, and the County continues to propose the same amendment that was before the Commission in July.

Staff believes, as it did in July, that the County’s proposed amendment does not raise significant coastal resource concerns. Staff continues to recommend that the Commission find the proposed amendment consistent with and adequate to carry out the policies of the Coastal Act and LUP, and that the Commission **approve** the amendment as submitted. The required motions and resolutions are on page 3.

Staff Note: LCP Amendment Action Deadline

This proposed LCP amendment was filed as complete on June 16, 2015. On July 8, 2015, the Commission voted to extend the deadline for the Commission’s action on this proposed LCP amendment by one year, to September 14, 2016. Thus, the Commission has until September 14, 2016 to take a final action on this LCP amendment.

TABLE OF CONTENTS

I. MOTIONS AND RESOLUTIONS3
II. FINDINGS AND DECLARATIONS.....4
 A. DESCRIPTION OF PROPOSED LCP AMENDMENT..... 4
 B. CONSISTENCY ANALYSIS..... 4
 C. CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) 6

EXHIBITS

Exhibit 1: Proposed LCP Amendment

I. MOTION AND RESOLUTION

Staff recommends that the Commission, after public hearing, approve the proposed LCP amendment as submitted. The Commission needs to make two motions in order to act on this recommendation.

A. Certify the LUP Amendment as Submitted

Staff recommends a **YES** vote on the motion below. Passage of the motion will result in certification of the LUP amendment as submitted and the adoption of the following resolution and findings. The motion to certify with suggested modifications passes only upon an affirmative vote of the majority of the appointed Commissioners.

***Motion:** I move that the Commission **certify** Land Use Plan Amendment LCP-3-SLO-15-0013-1 Part D as submitted by San Luis Obispo County, and I recommend a yes vote.*

***Resolution:** The Commission hereby certifies Land Use Plan Amendment LCP-3-SLO-15-0013-1 Part D as submitted by San Luis Obispo County and adopts the findings set forth below on the 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 measures 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 that would substantially lessen any significant adverse impacts which the Land Use Plan Amendment may have on the environment.*

B. Certify the IP Amendment as Submitted

Staff recommends a **NO** vote on the following motion. Failure of this motion will result in the certification of the IP 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.

***Motion:** I move that the Commission **reject** Implementation Plan Amendment LCP-3-SLO-15-0013-1 Part D as submitted by San Luis Obispo County. I recommend a no vote.*

***Resolution:** The Commission hereby certifies Implementation Plan Amendment LCP-3-SLO-15-0013-1 Part D as submitted by San Luis Obispo County and adopts the findings set forth in this staff report that, as submitted, the Implementation Plan amendment is consistent with and adequate to carry out the certified Land Use Plan. Certification of the Implementation Plan amendment 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 plan on the environment, or 2) there are no further feasible alternatives or mitigation measures that would substantially lessen any significant adverse impacts which the Implementation Plan Amendment may have on the environment.*

II. FINDINGS AND DECLARATIONS

A. DESCRIPTION OF PROPOSED LCP AMENDMENT

San Luis Obispo County proposes to amend the Land Use Plan (LUP) and Implementation Plan (IP) components of its certified Local Coastal Program (LCP) by deleting “warehousing” as an allowable land use within the LCP’s Residential Multi-Family land use category. Currently, warehousing is listed as an “S-19” use within the Residential Multi-Family designation, meaning it is an allowable use if it meets specific criteria and if required findings are made. Coastal Table O within the LUP’s Framework for Planning document lists thirteen land use categories,³ the allowable uses within those categories, and the permitting status for each. The S-19 designation requires conformance with the special standards listed in IP Section 23.08.400. This section describes requirements for “Wholesale Trade” uses, with Section 23.08.402 applying to warehousing. For warehousing in the Residential Multi-Family designation, the IP limits such use solely to mini-storage facilities and only when such facilities are found to be designed primarily to serve the needs of apartment residents.

The amendment would modify Table O by deleting warehousing as an S-19 use in the Residential Multi-Family land use designation, and would amend the IP by deleting the special standards identified in Section 23.08.400 that warehousing facilities in the Residential Multi-Family land use designation must meet. According to the County, the primary impetus behind the amendment is to lessen the competition between housing and other uses in these areas and to therefore to maximize housing opportunities in these areas, which tend to be located within existing developed communities near services and transit where such higher density residential development should be encouraged.

Please see Exhibit 1 for the proposed LUP and IP amendment language.

B. CONSISTENCY ANALYSIS

Standard of Review

The proposed amendment affects the LUP and IP components of the San Luis Obispo County LCP. The standard of review for LUP amendments is that they must conform with the policies of Chapter 3 of the California Coastal Act, and the standard of review for IP amendments is that they must conform with and be adequate to carry out the provisions of the certified LUP.

LUP Amendment Consistency Analysis

General industrial and general commercial developments are lower priority land uses under the Coastal Act:

Section 30222. The use of private lands suitable for visitor-serving commercial recreational facilities designed to enhance public opportunities for coastal recreation shall have priority over private residential, general industrial, or general commercial development, but not over agriculture or coastal-dependent industry.

³ The San Luis Obispo County LCP does not have zoning designations, but instead solely land use designations.

LCP-3-SLO-15-0013-1 Part D (Warehousing)

The Coastal Act also contains strong requirements to ensure that development protects public views of scenic coastal areas and is visually compatible with the character of surrounding communities:

Section 30251. The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting.

The Coastal Act requires new development to be located within existing developed communities, including to reduce the dependence on automobile trips:

Section 30250(a). (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...

Section 30253(d). New development shall do all of the following: Minimize energy consumption and vehicle miles traveled.

Finally, the Coastal Act encourages the provision of affordable housing:

Section 30604(f). The commission shall encourage housing opportunities for persons of low and moderate income. In reviewing residential development applications for low-and moderate-income housing, as defined in paragraph (3) of subdivision (h) of Section 65589.5 of the Government Code, the issuing agency or the commission, on appeal, may not require measures that reduce residential densities below the density sought by an applicant if the density sought is within the permitted density or range of density established by local zoning plus the additional density permitted under Section 65915 of the Government Code, unless the issuing agency or the commission on appeal makes a finding, based on substantial evidence in the record, that the density sought by the applicant cannot feasibly be accommodated on the site in a manner that is in conformity with Chapter 3 (commencing with Section 30200) or the certified local coastal program.

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.

The proposed amendment would prohibit mini-storage facilities (currently the only allowable type of warehousing facilities within Residential Multi-Family areas) within the coastal zone's higher density residential communities. As described above, the Coastal Act considers general industrial and commercial uses, such as mini-storage facilities, a lower priority land use, and encourages the provision of affordable housing, which oftentimes is accommodated via multi-unit housing developments. The proposed amendment would remove a potential barrier to the

LCP-3-SLO-15-0013-1 Part D (Warehousing)

provision of affordable housing by no longer allowing this lower priority Coastal Act general commercial/industrial use within the Residential Multi-Family land use designation. Prohibiting additional warehousing facilities may also help to protect visual resources and community character by keeping these areas residential as opposed to allowing warehousing facilities.

Some have argued that instead of disallowing warehousing in these areas, it would be more appropriate to identify standards that could be applied to such facilities in order to address potential issues that might arise. The County Planning Commission originally took this tact, but the Board of Supervisors ultimately decided that eliminating warehousing as an allowable use better met San Luis Obispo County goals and objectives. Although either approach could probably be found Coastal Act consistent, the County's proposed amendment deletes a lower priority Coastal Act land use from being allowed in a residential land use designation, and does not raise significant coastal resource concerns. For the reasons discussed above, the proposed LUP amendment can be found consistent with and adequate to carry out the Coastal Act.

IP Amendment Consistency Analysis

Because the LUP amendment deletes Coastal Table O's listing of warehousing as an allowable use within the Residential Multi-Family land use designation, the proposed IP amendment's deletion of the required standards for such warehousing facilities within that land use designation is consistent with and adequately carries out the LUP, as amended. Therefore, the proposed IP amendment carries out the amended LUP.

C. CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

The County, acting as lead CEQA agency, determined that the proposed LCP amendments were categorically exempt from the requirements of CEQA. This staff report has discussed the relevant coastal resource issues with the proposal. All public comments received to date have been addressed in the findings above. All above findings are incorporated herein in their entirety by reference.

The Coastal Commission's review and development process for LCPs and LCP amendments has been certified by the Secretary of Resources as being the functional equivalent of the environmental review required by CEQA. Specifically, Section 21080.9 of the California Public Resources Code – within CEQA – exempts 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 amendment. Therefore, local governments are not required to prepare an EIR in support of their proposed LCP amendments, although the Commission can and does use any environmental information that the local government submits in support of its proposed LCP amendments. The Commission's LCP review and approval program has been found by the Resources Agency to be the functional equivalent of the environmental review required by CEQA, pursuant to CEQA Section 21080.5. Therefore the Commission is relieved of the responsibility to prepare an EIR for each LCP amendment.

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 certain CEQA provisions, including the requirement in CEQA Section 21080.5(d)(2)(A) that the amended LCP

LCP-3-SLO-15-0013-1 Part D (Warehousing)

will not be approved or adopted as proposed if there are feasible alternative or feasible mitigation measures available which would substantially lessen any significant adverse impact which the activity may have on the environment. (CEQA Guidelines Sections 13542(a), 13540(f), and 13555(b)).

The County's LCP Amendment consists of a Land Use Plan (LUP) and Implementation Plan (IP) amendment. The Commission incorporates its findings on Coastal Act conformity into this CEQA finding as if it is set forth in full. This report has discussed the relevant coastal resource issues with the proposal, and has concluded that the proposed LCP amendment is not expected to result in any significant adverse impact on the environment. Thus, it is unnecessary for the Commission to suggest modifications to the proposed amendment to address adverse environmental impacts because the proposed amendment, as submitted, will not result in any significant environmental effects for which feasible mitigation measures would be required.

Thus, the proposed amendment is consistent with CEQA Section 21080.5(d)(2)(A).

IN THE BOARD OF SUPERVISORS
COUNTY OF SAN LUIS OBISPO, STATE OF CALIFORNIA

Tuesday, March 24, 2015

PRESENT: Supervisors Frank R. Mecham, Bruce S. Gibson, Adam Hill, Lynn Compton, and
Chairperson Debbie Arnold

ABSENT: None

RESOLUTION NO. 2015-75

RESOLUTION TO AMEND THE SAN LUIS OBISPO COUNTY GENERAL PLAN, FRAMEWORK FOR PLANNING (INLAND), PART I OF THE LAND USE AND CIRCULATION ELEMENTS (LUCE); THE CARRIZO, NORTH COUNTY, SAN LUIS OBISPO, AND SOUTH COUNTY AREA PLANS, PART II OF THE LUCE; THE OFFICIAL MAPS, PART IV OF THE LUCE; THE CONSERVATION AND OPEN SPACE ELEMENT; THE RULES OF PROCEDURE TO IMPLEMENT THE CALIFORNIA LAND CONSERVATION ACT OF 1965; THE REAL PROPERTY DIVISION ORDINANCE, TITLE 21 OF THE COUNTY CODE; THE LAND USE ORDINANCE, TITLE 22 OF THE COUNTY CODE; THE COASTAL ZONE LAND USE ORDINANCE, TITLE 23 OF THE COUNTY CODE AND APPROVAL OF ENVIRONMENTAL DOCUMENTS

The following resolution is now hereby offered and read:

WHEREAS, state law requires that a general plan be adopted; and

WHEREAS, the Land Use and Circulation Element of the San Luis Obispo General Plan was adopted by the Board of Supervisors on September 22, 1980; and

WHEREAS, the Conservation and Open Space Element of the San Luis Obispo General Plan was adopted by the Board of Supervisors on May 20, 2010 and is a proper element of the General Plan; and

WHEREAS, on March 1, 1988, the San Luis Obispo County Board of Supervisors adopted the Local Coastal Program as amendments and additions to the Land Use Element of the San Luis Obispo County General Plan, specifically incorporating the Land Use Plan of the Local Coastal Program into the Land Use Element of the General Plan hereinafter referred to as the "Land Use Element and Local Coastal Plan", and to the San Luis Obispo County Code Titles 19, 21, and 23; and

WHEREAS, state law, public necessity, convenience and general welfare requires that general and specific plans be amended from time to time; and

WHEREAS, Government Code Section 51231 authorizes the Board of Supervisors, by resolution, to adopt rules governing the administration of agricultural preserves, including procedures for initiating, filing, and processing requests to establish preserves; and

WHEREAS, on June 26, 1972, the Board of Supervisors duly adopted Resolution No. 72-396 wherein it adopted "Rules of Procedure to Implement the Land Conservation Act of 1965" in the County of San Luis Obispo pursuant to the provisions of Government Code Section 51231; and

WHEREAS, the Board of Supervisors subsequently amended said Rules of Procedure by duly adopting Resolution No. 73-579 on October 15, 1973, Resolution No. 74-135 on March 16, 1974, Resolution 76-574 on August 10, 1976, Resolution No. 91-370 on July 2, 1991, Resolution No. 95-58 on

February 7, 1995, and Resolution No. 2001-334 on August 14, 2001, Resolution No. 2007-442 on December 4, 2007, Resolution No. 2008-72 on February 26, 2008 and Resolution 2011-373 on November 8, 2011; and

WHEREAS, the Board of Supervisors finds that it is in the public interest to consider further amendments to the previously adopted Rules of Procedure; and

WHEREAS, the Planning Commission of the County of San Luis Obispo after noticed public hearings did recommend amendments to the San Luis Obispo County General Plan, Framework For Planning (Inland), Part I of the Land Use and Circulation Elements (LUCE); the Carrizo, North County, San Luis Obispo, and South County Area Plans, Part II of the LUCE; the Official Maps, Part IV of the LUCE; the Conservation and Open Space Element; the Rules of Procedure to Implement the California Land Conservation Act of 1965; the Real Property Division Ordinance, Title 21 of the County Code; the Land Use Ordinance, Title 22 of the County Code; the Coastal Zone Land Use Ordinance, Title 23 of the County Code; or otherwise took action recommending said amendments.

NOW THEREFORE, BE IT RESOLVED AND ORDERED by the Board of Supervisors of the County of San Luis Obispo, State of California, in a regular meeting assembled on the twenty-fourth day of March, 2015, that the San Luis Obispo County General Plan, Framework For Planning (Inland), Part I of the Land Use and Circulation Elements (LUCE); the Carrizo, North County, San Luis Obispo, and South County Area Plans, Part II of the LUCE; the Official Maps, Part IV of the LUCE; the Conservation and Open Space Element; the Rules of Procedure to Implement the California Land Conservation Act of 1965; the Real Property Division Ordinance, Title 21 of the County Code; the Land Use Ordinance, Title 22 of the County Code; the Coastal Zone Land Use Ordinance, Title 23 of the County Code; be amended as follows:

1. Amend the San Luis Obispo County General Plan, Land Use and Circulation Element, Official Maps, by changing the designation for the parcels shown on Exhibit LRP2014-00015:C, attached hereto and incorporated herein as though fully set forth. [This document was not certified as part of the Local Coastal Program. Therefore this amendment does not need to be submitted to the California Coastal Commission.]
2. Amend the San Luis Obispo County General Plan – Land Use and Circulation Element and Conservation and Open Space Element, as such amendment appears on Exhibit LRP2014-00015:C, attached hereto and incorporated herein as though fully set forth. [This document was not certified as part of the Local Coastal Program. Therefore this amendment does not need to be submitted to the California Coastal Commission.]
3. Amend the “Rules of Procedure to Implement the California Land Conservation Act of 1965” as such amendment appears on Exhibit LRP2014-00015:E attached hereto and incorporated herein as though fully set forth. [This document was not certified as part of the Local Coastal Program. Therefore this amendment does not need to be submitted to the California Coastal Commission.]
4. Adopt, enact and instruct the Chairperson of the Board of Supervisors to sign “An Ordinance Amending Title 21 Of The San Luis Obispo County Code, The Real Property Division Ordinance, Chapter 3 Relating To Flood Hazard Combining Designation Areas” As Such Amendment Appears On Exhibit LRP2012-00002:B, which is attached hereto and incorporated herein as though fully set forth, and pursuant to Public Resources Code, section 30514, authorize submittal to the California Coastal Commission for consideration and certification.
5. Adopt, enact and instruct the Chairperson of the Board of Supervisors to sign "An Ordinance Amending Title 22 Of The San Luis Obispo County Code, The Land Use Ordinance, Chapter 22.14 And

Article 8. Relating To Flood Hazard Combining Designation Areas”, as such amendment appears on Exhibit LRP2012-00002:C which is attached hereto and incorporated herein as though fully set forth. [This document does not apply to the Coastal Zone and was not certified as part of the Local Coastal Program. Therefore this amendment does not need to be submitted to the California Coastal Commission.].

6. Adopt, enact and instruct the Chairperson of the Board of Supervisors to sign "An Ordinance Amending Title 23 Of The San Luis Obispo County Code, The Coastal Zone Land Use Ordinance, Chapters 23.07 And 23.11 Relating To Flood Hazard Combining Designation Areas”, as such amendment appears on Exhibit LRP2012-00002:D which is attached hereto and incorporated herein as though fully set forth, and pursuant to Public Resources Code, section 30514, authorize submittal to the California Coastal Commission for consideration and certification.

7. Adopt, enact and instruct the Chairperson of the Board of Supervisors to sign “An Ordinance Amending The Land Use Ordinance, Title 22 Of The San Luis Obispo County Code, Relative To The Renewable Energy Streamlining Program (RESP)", as such amendment appears on Exhibit LRP2014-00015:D which is attached hereto and incorporated herein as though fully set forth. [This document does not apply to the Coastal Zone and was not certified as part of the Local Coastal Program. Therefore this amendment does not need to be submitted to the California Coastal Commission.].

8. Adopt, enact and instruct the Chairperson of the Board of Supervisors to sign "An Ordinance Amending The San Luis Obispo County Land Use Ordinance, Title 22 Of The County Code, Relative To Mini-Storage Warehouse Facilities In The Residential Multi-Family Land Use Category”, as such amendment appears on Exhibit LRP2014-00007:B which is attached hereto and incorporated herein as though fully set forth. [This document does not apply to the Coastal Zone and was not certified as part of the Local Coastal Program. Therefore this amendment does not need to be submitted to the California Coastal Commission.].

8.5 Amend Table O of the Coastal Zone Framework for Planning, Land Use Element and Coastal Program of the San Luis Obispo County General Plan, as such amendment appears on Exhibit LRP2014-00007:C, attached hereto and incorporated herein as though fully set forth, and pursuant to Public Resources Code, section 30514, authorize submittal to the California Coastal Commission for consideration and certification.

9. Adopt, enact and instruct the Chairperson of the Board of Supervisors to sign "An Ordinance Amending The San Luis Obispo County Coastal Zone Land Use Ordinance, Title 23 Of The County Code, Relative To Mini-Storage Warehouse Facilities In The Residential Multi-Family Land Use Category”, as such amendment appears on Exhibit LRP2014-00007:D which is attached hereto and incorporated herein as though fully set forth, and pursuant to Public Resources Code, section 30514, authorize submittal to the California Coastal Commission for consideration and certification.

10. Adopt, enact and instruct the Chairperson of the Board of Supervisors to sign "An Ordinance Amending Specific Sections of the San Luis Obispo County Land Use Ordinance, Title 22 of the County Code and the Coastal Zone Land Use Ordinance, Title 23 of the County Code" which is attached hereto and incorporated herein as though fully set forth.

BE IT FURTHER RESOLVED AND ORDERED that the environmental documents for the above enacted amendments be approved as follows:

1. Regarding the amendments that were processed on the basis of a General Rule Exemptions (Flood Hazard and Residential Multi-Family), the Board of Supervisors finds that the activity is covered by a general rule exemption (State CEQA Guidelines section 15061(b)(3) from the

California Environmental Quality Act (CEQA) because it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment.

2. Regarding the amendment that was processed on the basis of a proposed Final Environmental Impact Report (FEIR) (RESP-LRP2014-00015:A), the Board of Supervisors reviewed and considered the proposed Final Environmental Impact Report together with all comments received during the public review process prior to enacting the amendments. Further, on the basis of the environmental review and comments received for the Final Environmental Impact Report, there is substantial evidence that the amendments will have significant, unmitigable, unavoidable, adverse effects on the environment; therefore the Board of Supervisors hereby certifies the Final Environmental Impact Report pursuant to the applicable provisions of the California Environmental Quality Act (CEQA) and adopts the recommended findings of the County Environmental Coordinator, and adopts statements of overriding consideration, which are attached hereto in Exhibit LRP2014-00015:A and incorporated herein as though fully set forth. The Final Environmental Impact Report prepared reflects the independent judgment of the County of San Luis Obispo, acting as the lead agency for the adoption and amendments.

BE IT FURTHER RESOLVED AND ORDERED that this resolution with respect to Exhibits LRP2012-00002:B, LRP2012-00002:D, LRP2014-00007:C, and LRP2014-00007:D shall become operative automatically, pursuant to 14 California Code of Regulations §13551(b)(1), upon the certification without any modifications or amendments to said amendments by the California Coastal Commission and upon acknowledgment by the San Luis Obispo County Board of Supervisors of receipt of the Commission's resolution of certification pursuant to 14 California Code of Regulations §13544. In the event that the California Coastal Commission recommends modifications to said amendments, the amendments with modification shall be processed in accordance with Government Code § 65350 et seq., before final local government adoption of the amendments with the modifications suggested by Coastal Commission pursuant to 14 California Code of Regulations §13551(b)(2), or before the Board of Supervisors resubmits, pursuant to Public Resources Code Section 30512 and 30513, any additional amendments to satisfy the Commission's recommended changes.

BE IT FURTHER RESOLVED AND ORDERED that the local coastal program is intended to be carried out in a manner fully in conformity with the Coastal Act.

BE IT FURTHER RESOLVED AND ORDERED that in accordance with Government Code Section 25131, after reading of the title of the ordinances, further reading of the ordinances in full is waived.

BE IT FURTHER RESOLVED AND ORDERED that this resolution shall be effective on the same date as Ordinances 3288, 3289, 3290, 3291, 3292, 3293 and 3294, said date being April 25, 2015.

Upon motion of Supervisor Gibson, seconded by Supervisor Hill, and on the following roll call vote, to wit:

AYES: Supervisors Gibson, Hill, Mecham, and Compton
NOES: Chairperson Arnold
ABSENT: None
ABSTAINING: None

The foregoing resolution is hereby adopted.

Debbie Arnold
Chairperson of the Board of Supervisors
of the County of San Luis Obispo,
State of California

ATTEST

Tommy Gong
County Clerk and Ex-Officio Clerk
of the Board of Supervisors,
County of San Luis Obispo,
State of California

By: Annette Ramirez
Deputy Clerk

[SEAL]

APPROVED AS TO FORM AND LEGAL EFFECT:

RITA L. NEAL
County Counsel

By: /s/ Timothy McNulty
Assistant County Counsel

Dated: March 24, 2015

| |
|---|
| <p>STATE OF CALIFORNIA) COUNTY OF SAN LUIS OBISPO) ss.</p> <p>I, TOMMY GONG, County Clerk of the above entitled County, and Ex-Officio Clerk of the Board of Supervisors thereof, do hereby certify the foregoing to be a full, true and correct copy of an order entered in the minutes of said Board of Supervisors, and now remaining of record in my office.</p> <p>Witness, my hand and seal of said Board of Supervisors on April 27, 2015.</p> <p style="text-align: center;">TOMMY GONG, County Clerk and Ex-Officio Clerk of the Board of Supervisors</p> <p>By: <u><i>Annette Ramirez</i></u> Deputy Clerk</p> |
|---|

ATTACHMENT 3 EXHIBIT LRP2014-00007:C

Table O of the Coastal Zone Framework for Planning

Amend Table O of the Coastal Zone Framework for Planning, Land Use Element and Local Coastal Program of the San Luis Obispo County General Plan, Chapter 6, page 6-31, by removing Warehousing as an "S-10" use in the Residential Multi-Family land use category as follows:

| USE GROUP | PAGE NUMBER OF USE | LAND USE CATEGORY | | | | | | | | | | | | | |
|--------------------------------|--------------------|---------------------------|-------------------------------|--------------|------------|-------------------|----------------------|---------------------------|--------------------------|-----------------------|-------------------|--------------------|------------|------------|-------------------|
| | | Agriculture - Prime Soils | Agriculture - Non-Prime Soils | Kameli Lands | Recreation | Residential Rural | Residential Suburban | Residential Single-Family | Residential Multi-Family | Office & Professional | Commercial Retail | Commercial Service | Commercial | Industrial | Public Facilities |
| J TRANSIENT LODGINGS | | | | | | | | | | | | | | | |
| Bed & Breakfast Facilities | 1 | 6-41 | S-12 | S-12-P | S-12-P | S-12-P | S-12-P | | S-12 | S-12 | S-12-P | S-12 | | S-12 | |
| Homestays | 5 | 6-48 | | | | | S-12 | S-12 | | | | | | | |
| Hotels, Motels | 2 | 6-48 | | | S-12-P | | | | S-12 | S-12-P | S-12 | | | S-12 | |
| Recreational Vehicle Parks | 3 | 6-55 | | | S-12-P | | | | | | S-12 | S-12 | | S-1 | |
| Temporary Const. Trailer Park | 4 | 6-59 | S-12 | S-12 | | S-12 | | | | | | | S-12 | | |
| J TRANSPORTATION | | | | | | | | | | | | | | | |
| Airfields & Landing Strips | 1 | 6-40 | S-13 | S-13 | S-13 | S-13 | S-13 | | | S-13 | | S-13 | S-13 | S-13-P | |
| Harbors | 2 | 6-47 | | | | | | | | | | | | S-1-P | |
| Marine Terminals & Piers | 3 | 6-50 | | | S-5 | | | | | | S-5 | S-5 | S-5-P | | |
| Pipelines & Transmission Lines | 4 | 6-54 | S-13 | S-13 | S-13 | S-13 | S-13 | S-13 | S-13 | S-13 | S-13 | S-13 | S-13 | S-13 | S-14 |
| Public Utility Facilities | 5 | 6-55 | S-13 | S-13 | S-13 | | S-13 | S-13 | S-13 | S-13 | S-13 | S-13 | S-13 | P | |
| Transit Stations & Terminals | 6 | 6-60 | | | S-2 | | | | S-2 | S-2 | S-2 | A | A | | |
| Truck Stops | 7 | 6-60 | | | | | | | | | A | A | | | |
| Vehicle & Freight Terminals | 8 | 6-60 | | | | | | | | | A | A | | | |
| Vehicle Storage | 9 | 6-60 | | | S-13 | | | | S-13 | S-13 | P | A | A | | |
| K WHOLESALE TRADE | | | | | | | | | | | | | | | |
| Warehousing | 1 | 6-60 | | S-19 | S-19 | | | | S-10 | | | P | A | A | |
| Wholesaling & Distribution | 2 | 6-61 | | S-19 | S-19 | | | | | | P | A | | | |

EXHIBIT LRP2014-00007:D
ORDINANCE NO. 3293

**AN ORDINANCE AMENDING THE SAN LUIS OBISPO COUNTY COASTAL ZONE LAND USE
ORDINANCE , TITLE 23 OF THE COUNTY CODE, RELATIVE TO MINI-STORAGE
WAREHOUSE FACILITIES IN THE RESIDENTIAL MULTI-FAMILY LAND USE CATEGORY**

The Board of Supervisors of the County of San Luis Obispo ordains as follows:

SECTION 1: Section 23.08.402, Warehousing, of the Coastal Zone Land Use Ordinance, Title 23 of the San Luis Obispo County Code, is hereby amended to read as follows:

23.08.402 - Warehousing: The standards of this section apply to warehouse uses in the Agriculture and Rural Lands land use categories.

- a. **Limitation on use.** Warehousing uses in the Agriculture and Rural Lands categories are limited to storage facilities that support approved agricultural production or processing operations conducted on the same site.

SECTION 2: This project is covered by the general rule that CEQA applies only to projects which have the potential for causing a significant effect on the environment. It can be seen with certainty that there is no possibility that this project may have a significant effect on the environment; therefore, the activity is not subject to CEQA. [Reference: State CEQA Guidelines sec. 15061(b)(3), General Rule Exemption]

SECTION 3: If any section, subsection, clause, phrase or portion of this ordinance is for any reason held to be invalid or unconstitutional by the decision of a court of competent jurisdiction, such decision shall not affect the validity or constitutionality of the remaining portion of this ordinance. The Board of Supervisors hereby declares that it would have passed this ordinance and each section, subsection, clause, phrase or portion thereof irrespective of the fact that any one or more sections, subsections, sentences, clauses, phrases or portions be declared invalid or unconstitutional.

SECTION 4: The Local Coastal Program is intended to be carried out in a manner fully in conformity with the Coastal Act.

SECTION 5: This amendment shall become operative automatically, pursuant to 14 California Code of Regulations Section 13551(b)(1), upon the certification without any modifications to said amendments by the California Coastal Commission and upon acknowledgement by the San Luis Obispo County Board of Supervisors of receipt of the Commission's resolution of certification pursuant to 14 California Code of Regulations Section 13544. In the event that the California Coastal Commission recommends modifications to said amendments, the amendments with modification shall be processed in accordance with Government Code Section 65350 et seq., before final local government adoption of the amendments with modifications suggested by the Coastal Commission pursuant to 14 California Code of Regulations Section 13551(b)(2), or before the Board of Supervisors resubmits, pursuant to Public Resources Code Sections 30512 and 30513, any additional amendments to satisfy the Commission's recommended changes.

SECTION 6: This ordinance shall take effect and be in full force on and after 30 days from the date of its passage hereof. Before the expiration of 15 days after the adoption of this ordinance by the San Luis Obispo County Board of Supervisors, it shall be published once in a newspaper of general circulation published in the County of San Luis Obispo, State of

23.08.402 - Warehousing: The standards of this section apply to warehouse uses in the Agriculture, and Rural Lands ~~and Residential Multi-Family~~ land use categories.

a. Limitation on use.

~~(1) Agriculture and Rural Lands.~~ Warehousing uses in the Agriculture and Rural Lands categories are limited to storage facilities that support approved agricultural production or processing operations conducted on the same site.

~~(2) Residential Multi-Family.~~ Warehousing in the Residential Multi-Family land use category is limited to mini-storage facilities.

b. Permit requirement. Minor Use Permit approval when located in the Residential Multi-Family category, provided that the applicable review authority shall first find that the proposed storage facilities are designed primarily to serve the needs of apartment residents in the same land use category.

c. Development standards – Residential Multi-Family category. Warehouse facilities in the Residential Multi-Family land use category are subject to the same site design and site development standards in Chapters 23.04 and 23.05 of this Title as Multi-Family Dwellings.