

**CALIFORNIA COASTAL COMMISSION**

SOUTH CENTRAL COAST DISTRICT OFFICE  
89 SOUTH CALIFORNIA STREET, SUITE 200  
VENTURA, CA 93001-2801  
VOICE (805) 585-1800



# Th11a

**LCP-4-STB-24-0028-1-Part B (Housing Element Update/Rezoning)**

**November 6, 2025**

**CORRESPONDENCE**

# CITY of CARPINTERIA, CALIFORNIA



October 31, 2025

California Coastal Commission  
South Central Coast District  
California Coastal Commission  
89 S California Street #200  
Ventura, CA 93001

RE: County of Santa Barbara Local Coastal Program ("LCP") Amendment No. LCP-4-STB-24-0028-1-Part B (Housing Element Update/Rezoning) – November 6, 2025 Commission Hearing (Item Th11a)

Dear Chair Harmon and Honorable Commissioners:

On behalf of the City of Carpinteria ("City"), we respectfully submit this letter in strong opposition to portions of Item Th11a. Specifically, our comments pertain to the proposed rezoning of three rural/agricultural sites within the Carpinteria Valley (the **Bailard, Van Wingerden 1, and Van Wingerden 2** sites) under Santa Barbara County ("County") Local Coastal Program Amendment No. LCP-4-STB-24-0028-1 (Part B). The City's comments are not directed at other components of the County's amendment, such as the Friendship Manor site in Isla Vista, which lies outside the Carpinteria Valley and does not raise comparable Coastal Act resource conflicts.

The City fully recognizes California's urgent need for additional housing and continues to support the development of affordable and workforce housing within its own urbanized areas and in the Santa Barbara south coast region. However, the Coastal Act requires that housing production be balanced with the protection of agricultural, scenic, and coastal resources. The proposed amendment fails to achieve that balance. By locating the County's highest-density housing designations outside the established urban boundary and on lands that form part of the Carpinteria Valley's agricultural and open-space mosaic, **it would undermine both Coastal Act policies and decades of coordinated planning between the City, County, and Commission.**

The proposed amendment would:

- Convert or intensify use of rural and agricultural lands in direct conflict with Coastal Act §§ 30241 and 30242;
- Redraw the long-established urban–rural boundary to accommodate densities (20-40 du/ac) and building heights unprecedented in the Valley, contrary to § 30250's direction that new development occur within existing developed areas;
- Alter the Valley's scenic and rural coastal character, violating § 30251; and
- Bypass meaningful public review by enabling ministerial "by-right" approvals for future development on these sites, removing mechanisms to ensure compliance with Coastal Act or LCP policies.

For nearly five decades, the City and the California Coastal Commission ("CCC") have worked in partnership to preserve the Valley's irreplaceable agricultural resources and maintain a stable

urban-rural boundary that defines both the City's compact form and the region's visual and environmental character. The current proposal before the Commission threatens to dismantle that framework. The County's own Program Environmental Impact Report ("PEIR") acknowledges that these rezones would cause significant and unavoidable impacts to agriculture, scenic resources, and land use consistency. Approving the amendment despite those findings would erode the integrity of the Commission's prior decisions protecting the Carpinteria Valley and would set a dangerous precedent for additional future conversions of coastal farmland.

Accordingly, the City urges the Commission to **deny certification** of the proposed amendment (i.e., modify the amendment to remove the three Carpinteria Valley sites). Supplemental information and supporting documentation are provided in Attachments A and B.

## I. BACKGROUND AND CITY INTEREST

### A. Nearly Fifty Years of Preserving Agriculture

Since the adoption of the 1976 California Coastal Act and the establishment of the Coastal Zone Boundary in 1977, the Carpinteria Valley has been recognized as one of the last intact expanses of prime coastal agricultural land on the South Coast. Historical Commission records reflect that when the coastal zone boundary was established, it was intentionally extended inland around the entire Carpinteria Valley to capture and protect this productive farmland as a permanent resource area, distinguishing it from more urbanized coastal plains to the south.

The City's own General Plan / Coastal Land Use Plan ("GP/CLUP"), comprehensively updated and certified by the Coastal Commission in 2003 ([LCP Amendment 1-01](#)), codifies that commitment. It establishes compact urban development, preservation of open-field agriculture, and maintenance of the Carpinteria Valley Greenbelt as foundational land-use principles consistent with Coastal Act Chapter 3.

### B. The Stable and Long-Standing Urban-Rural Boundary

For nearly half a century, the urban-rural boundary separating the incorporated City from unincorporated agricultural lands has remained stable and effective. It protects prime soils and scenic coastal landscapes, prevents sprawl, and defines the City's "small beach town" identity. The Commission has consistently affirmed this boundary in numerous City and County actions, treating it as a permanent planning line—not a flexible growth boundary.

The County's proposed amendment would move that boundary inland for the first time in decades, **urbanizing approximately 30 acres of productive farmland for the highest densities contemplated anywhere in the Valley**. This would effectively dismantle the City's and Commission's long-established policy of a compact urban footprint surrounded by open agricultural land.

### C. CCC Staff Underestimates the Number of Units Allowed by the Rezones

The CCC staff report substantially understates the development potential of the three Carpinteria-area sites. When realistic assumptions about site size, State density bonuses, and affordable-housing incentives are applied, the potential yield is **hundreds of units higher** than reported. The result is an unprecedented residential intensity at the City's fringe, unsupported by existing infrastructure and fundamentally inconsistent with the scale and character of surrounding development. The City's calculations are provided in Attachment A.

#### D. High-Density Edge Development Conflicts with Sound Planning

Siting this high-density residential zoning on the City's rural edge contradicts the planning principles shared by both jurisdictions and enshrined in Coastal Act § 30250: direct growth to existing developed areas with available infrastructure and services. The proposed pattern constitutes **leap-frog development**, introduces **unmitigated impacts** on City utilities, traffic, and parks, and **undermines the regional goal** of compact, transit-oriented housing. It would also create a visible and physical breach in the agricultural greenbelt that the Commission and City have long sought to preserve.

## II. INCONSISTENCY WITH THE COASTAL ACT

The proposed LCP amendment is inconsistent with multiple mandatory policies of the California Coastal Act (Public Resources Code §§ 30241, 30242, 30250, and 30251). These provisions collectively require the preservation of agricultural lands, orderly concentration of development, and protection of the scenic and rural qualities that define the Carpinteria Valley. As detailed below and in Attachment A, the County and CCC staff analyses fail to demonstrate compliance with these statutes or to make the specific findings required for conversion of agricultural or rural lands to urban use.

#### A. Agricultural Viability Not Analyzed or Determined

Statutory Standard: Coastal Act § 30241.5 requires findings of agricultural infeasibility before conversion of prime lands.

Conflict: The County's information and PEIR, as well as the CCC staff report, include no analysis or substantial evidence demonstrating infeasibility of continued cultivation on the proposed rezoned sites. Active production continues today, and no evidence shows that sustained farming is impracticable.

Result: Without those findings, the amendment cannot be found consistent with § 30241 or County LCP Policy 8-1.

#### B. PRC § 30241 – Protection of Prime Agricultural Lands

Statutory standard: Section 30241 mandates that “the maximum amount of prime agricultural land shall be maintained in agricultural production” and prohibits conversion unless (1) continued agricultural use is no longer feasible and (2) the conversion will not diminish agricultural viability elsewhere, or when the conversion would complete a logical and viable neighborhood and contribute to a stable urban-development limit.

Conflict: The proposed amendment would redesignate prime soils for residential use even though the County's own PEIR confirms that the land remains suitable and productive for agriculture. The CCC staff report attempts to justify conversion by asserting that the parcels are “logical extensions of existing neighborhoods” or “transitional sites.” This reasoning is circular: the very urbanization proposed is used to justify further urbanization. Such rationale has been expressly rejected by the Commission in prior South Coast cases, where incremental encroachment was found to erode long-term agricultural viability.

The CCC staff report offers no factual basis for concluding these sites are appropriately located for residential use. Multi-family development on Van Wingerden 1 would be wholly different in character and intensity from its surroundings and would rely on vehicular access through either a low-density single-family neighborhood or a narrow private agricultural driveway, neither of which are designed nor realistically capable of being improved to accommodate the traffic volumes such development would generate. Van Wingerden 2 is physically separated from existing residential areas by Franklin Creek and additional farmland, creating no continuity with or opportunity to complete an established neighborhood. Each site would form an isolated pocket of urban, high-density development within an otherwise agricultural setting, contrary to § 30241's intent to protect and concentrate urban uses within existing community boundaries.

Result: Because agricultural feasibility has not been evaluated, and because these rezones would not complete or reinforce any logical neighborhood pattern but would instead erode the stable urban–rural boundary that has defined the Carpinteria Valley for nearly fifty years, the findings required by § 30241 (a)-(d) cannot be supported.

#### C. PRC § 30242 – Conversion of Non-Prime Agricultural Lands, if Applicable

Statutory standard: Although the rezone sites appear to qualify as prime agricultural lands under §30241, even if the Commission were to classify them as non-prime, §30242 still prohibits conversion unless continued agricultural use is infeasible and such conversion would not adversely affect nearby agricultural viability.

Conflict: The staff report concedes that the affected parcels are actively cultivated but nonetheless treats them as “logical in-fill.” No evidence demonstrates infeasibility of continued use or identifies protective measures to avoid secondary impacts on adjoining farms, such as reverse-sensitivity conflicts, pesticide setbacks, or loss of shared infrastructure. By treating the presence of adjacent housing as justification for more housing, the analysis employs circular logic that undermines § 30242's purpose to retain non-prime lands in productive use where feasible.

Result: The proposed conversion would not only remove existing agricultural capacity but also create new land-use incompatibilities that could accelerate the decline of surrounding agriculture, contrary to the statute's explicit intent.

#### D. PRC § 30250 – Location of New Development and Urban Sprawl

Statutory standard: Section 30250 requires that “new development shall be located within, contiguous with, or in close proximity to existing developed areas able to accommodate it” and that it “shall not have significant adverse effects, either individually or cumulatively, on coastal resources.”

Conflict: The rezones would extend the developed footprint of the Carpinteria urban area into the rural edge of the Valley, creating a clear leap-frog pattern of growth. The sites lack direct access to high-capacity transportation, urban utilities, and community services within walking distance, necessitating automobile dependency inconsistent with Coastal Act goals. The County's PEIR acknowledges significant and unavoidable impacts to land use, agriculture, and scenic quality, confirming that the sites are not suitable infill under § 30250. Moreover, the City's parking, roadway, transit, stormwater, parks and recreation facilities, and infrastructure would be burdened by new demand generated by County-approved units outside City limits, with no

mitigation or coordination mechanism. This fragmented approach directly contradicts § 30250's mandate for coordinated, contiguous urban development.

#### E. PRC § 30251 – Visual and Scenic Resource Protection

Statutory standard: Section 30251 requires that development “protect views to and along the ocean and scenic coastal areas, and be visually compatible with the character of surrounding areas.”

Conflict: The Carpinteria Valley's open agricultural fields and backdrop of foothills form one of the most recognizable scenic landscapes on California's South Coast, visible from U.S. 101, Via Real, and the foothill corridors. The proposed densities (20-40 du/ac) and building heights (45 feet<sup>1</sup>) would introduce urban massing and glare into a predominantly open vista. The County's PEIR identifies visual impacts that remain significant and unavoidable; nevertheless, the CCC staff report provides no viewshed analysis, photo simulations, or findings demonstrating compliance with § 30251. Further, certification of the proposed amendment would remove any future opportunity for site-specific review of scenic impacts. Because subsequent residential development on these sites would qualify for ministerial, “by-right” approval under State housing law, neither the Commission nor the City would be able to require visual simulations, height step-backs, or landscape screening to ensure compatibility with the Valley's coastal setting. The loss of discretionary review would make it impossible to apply § 30251's standards at the project level, resulting in irreversible alteration of the Valley's scenic open-space views.

Result: Approval of the amendment would permanently alter the Valley's scenic quality, establish a visible precedent for urban expansion into agricultural land, and contravene the Commission's longstanding policies on protection of scenic coastal resources.

#### ➤ Summary

Individually and collectively, the proposed rezones fail to meet the minimum standards of Coastal Act §§ 30241, 30242, 30250, and 30251. The absence of agricultural feasibility findings, reliance on circular “logical completion” arguments, and disregard of admitted significant/unavoidable impacts compel the conclusion that the amendment is not in conformity with Chapter 3 of the Coastal Act and therefore cannot be certified. This procedural defect compounds the substantive conflicts noted above: once the amendment is certified, future development of these sites would proceed without discretionary Coastal Development Permit review, precluding any mechanism to address or mitigate visual, agricultural, or cumulative resource impacts under the Coastal Act. Detailed supporting evidence and citations are provided in Attachment A.

### III. PRECEDENT AND CUMULATIVE IMPACTS ON THE CARPINTERIA VALLEY

#### A. County PEIR Findings

The County's Final PEIR (March 2024) for the Housing Element Update establishes that the proposed rezones in the Carpinteria Valley will cause significant and unavoidable impacts to

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<sup>1</sup> The County's Design Residential (DR) Zone limits height to 35 feet; however, applying the State Density Bonus Law, the current Bailard proposal shows the building heights at 42-46 feet (see Attachment B).

agricultural resources, land use consistency, visual quality, transportation, and public services. These impacts remain even after the County's adoption of all feasible mitigation measures.

Specifically, the PEIR acknowledges that:

- No feasible mitigation exists for the permanent loss of prime agricultural land (Impacts AG-1 and AG-2);
- Cumulative degradation of scenic and rural character would occur throughout the South Coast, including the Carpinteria Valley; and
- The Environmentally Superior Alternative (Alternative 3 – Option A) did not eliminate any of the Carpinteria Valley rezone sites and therefore failed to reduce or avoid the most severe agricultural and visual impacts identified in the PEIR.

In other words, while the County identified an “environmentally superior” scenario on paper, no alternative was evaluated that would have meaningfully avoided coastal resource impacts. A reasonable alternative removing or deferring the three Carpinteria Valley sites (precisely the action now before the Commission) was never analyzed, even though it would have directly advanced Coastal Act objectives.

By selecting the full buildout scenario that includes all three Carpinteria Valley sites, the County knowingly accepted permanent and unavoidable losses of prime agricultural land and scenic open space. These findings confirm that the environmental record does not support a Coastal Act consistency determination under PRC § 21080.5(d)(2)(A).

Rather than demonstrating avoidance or reduction of impacts, the certified PEIR concedes that significant agricultural and visual resource degradation is an inevitable outcome of the proposed amendment.

## B. Cascading and Cumulative Effects on the Carpinteria Valley

Approval of these rezones would trigger cumulative and self-reinforcing effects throughout the Carpinteria Valley. Converting the three rural/agricultural sites would fracture the continuous belt of farmland that has long served as a visual and functional buffer between the City and the foothills. Once the urban edge is breached, remaining agricultural parcels become more vulnerable to land-use conflicts, infrastructure pressure, and speculative transition. City staff is aware of at least four additional farms in the Valley (outside the urban boundary) whose owners have expressed interest in selling to developers. As an additional example that is already pending, the County is currently processing a Builder's Remedy application for approximately 40 multifamily units on a three-acre property within the Carpinteria Valley zoned for Agriculture<sup>2</sup>. This project was not identified as a cumulative development in the certified PEIR and is proceeding without an LCP Amendment. It exemplifies how piecemeal and uncoordinated actions are incrementally degrading the Valley's protected coastal resources without comprehensive analysis or mitigation.

Because the rezoned parcels would allow ministerial approval of future housing, no subsequent CEQA or discretionary Coastal Development Permit review would occur to evaluate project-specific or cumulative effects. This would foreclose the ability to identify or mitigate incremental

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<sup>2</sup> Case Nos. 24DVP-00024/24CDP-00097/25TPM-00001; Van Wingerden Family Trust Housing Development; 1360 Cravens Lane, APN 004-013-025

losses of farmland, habitat, or scenic open space. In effect, the County's LCP amendment would authorize a new pattern of coastal development that extends urban uses into the Valley without the safeguard of discretionary oversight.

Finally, the resulting increase in residential intensity would strain regional infrastructure systems (including parking, roads, transportation, park/recreation, and stormwater facilities), most of which are owned and maintained by the City of Carpinteria. The City would bear secondary service impacts without representation in the land-use decision-making process, contrary to the cooperative planning framework historically upheld by the Commission.

#### C. Departure from Long-Standing Commission Precedent

For nearly fifty years, the California Coastal Commission has consistently maintained a policy of protecting the Carpinteria Valley as a unique agricultural and scenic resource area. In certifying the City's 2003 GP/CLUP, the Commission explicitly endorsed a compact urban form and a stable urban-rural boundary designed to prevent precisely this type of expansion into the Valley's open fields. The proposed amendment would reverse that precedent by re-drawing the boundary to permit the County's highest-density housing on sites long understood to be part of the Valley's agricultural landscape.

Such an action would not only undermine the integrity of past Commission decisions but also establish a precedent for other jurisdictions along the South Coast to pursue similar conversions of agricultural land under the banner of housing compliance. If approved, this would signal that even areas historically designated for permanent agricultural protection are now open to incremental urbanization whenever convenient for regional housing targets, thus contradicting the Coastal Act's legislative intent to balance housing and resource protection.

#### ➤ Conclusion

The PEIR's admission of unavoidable impacts, coupled with the County's rejection of a feasible reduced-impact alternative that would have avoided the Carpinteria Valley agricultural conversions, demonstrates that certification of the proposed LCP amendment would have cascading and irreversible effects on the Carpinteria Valley. Once approved, these rezonings would institutionalize a new pattern of agricultural conversion, scenic degradation, and inter-jurisdictional fragmentation fundamentally at odds with the Coastal Act's purpose.

### IV. INTERNAL INCONSISTENCY WITH THE COUNTY'S CERTIFIED LOCAL COASTAL PROGRAM

#### A. County Policies Requiring Stable Boundaries and Protection of Agricultural Lands

The County of Santa Barbara's certified LCP contains clear, long-standing directives to maintain stable urban-rural boundaries and to protect agricultural lands as a permanent part of the coastal resource base. The Land Use Plan (LUP) Agricultural Element and Policies 8-1 and 8-3 provide that:

- *Policy 8-1:* Agricultural lands shall be maintained in agricultural production wherever feasible, and conversion to non-agricultural uses shall be permitted only where continued or

renewed agricultural use is not feasible and where the conversion will not impair the viability of surrounding agriculture.

- *Policy 8-3:* The County shall maintain a clear and stable urban-rural boundary to prevent the encroachment of urban uses into agricultural and rural areas and to protect the long-term integrity of agricultural operations.

These policies, certified by the Commission and incorporated into the County's LCP, mirror Coastal Act §§ 30241 and 30242. They require explicit findings of infeasibility before any conversion of agricultural land and prohibit changes that would destabilize the boundary separating urban and rural uses.

## B. Conflicts Created by the Proposed Amendment

The proposed LCP amendment conflicts with these certified policies in several ways:

1. Undermines the stability of the urban-rural boundary.

The proposed redesignations of the Van Wingerden 1, Van Wingerden 2, and Bailard sites would extend urban zoning north of the established boundary for the first time in decades, eroding the integrity of the Carpinteria Valley's agricultural belt. The staff report attempts to frame the change as a "logical extension of existing neighborhoods," but this directly contradicts the intent of Policy 8-3 to prevent exactly such incremental expansion.

2. Authorizes conversion without the required infeasibility findings.

None of the supporting documents demonstrate that continued agricultural use of the Van Wingerden sites is infeasible under Policy 8-1. The parcels remain in active production, supported by infrastructure, irrigation water, and cooperative operations. As such, the County and Commission staff cannot make the findings required for conversion under the County's own LCP.

3. Creates land-use conflicts with surrounding agriculture.

The proposed residential densities and associated public improvements (lighting, noise, vehicle activity) will create reverse-sensitivity conflicts that compromise the viability of adjoining farms. These secondary impacts are expressly prohibited by Policy 8-1, which requires that conversion "not impair the viability of surrounding agriculture."

4. Eliminates agricultural buffers required by the LCP Implementation Plan.

The LCP Implementation Section 35-144.O requires agricultural buffers between urban and agricultural lands to protect both visual quality and farm operations. The proposed rezones, particularly Bailard and Van Wingerden 1, would remove or reduce these buffers, replacing them with residential streets and hardscape, again inconsistent with the County's own certified development standards.

5. Conflict with Agricultural Enterprise Ordinance and Right-to-Farm Policy

In addition to conflicting with the County's certified LCP Policies, the proposed amendment would undermine local regulations intended to preserve agricultural viability. The County's Agricultural Enterprise Ordinance (CZO §35-144.O), a certified component of the LCP, requires adequate buffers and operational compatibility between agricultural and non-agricultural uses. By designating the Van Wingerden and Bailard sites for dense

residential use without discretionary review, the County would preclude application of those standards and invite land-use conflicts contrary to both the CZO and Coastal Act §§30241–30242.

Furthermore, the County’s Right to Farm Ordinance (County Code Ch. 25, Art. II) expresses a countywide policy to protect agricultural operations from nuisance conflicts. The proposed rezonings would subvert that policy by encouraging incompatible residential encroachment, thereby weakening both local and state agricultural protection objectives.

#### C. Omission of Policy Analysis in CCC Staff Report

Despite these clear conflicts, the CCC staff report does not address nor reconcile the inconsistency between the proposed rezones and the County’s certified LCP. Instead, the report relies almost exclusively on general references to the County’s housing obligations and the notion that the rezones “further affordable housing goals.” That reasoning does not satisfy the requirement for a coastal resource–based findings analysis under the Coastal Act.

The County’s LCP is part of the enforceable coastal policy framework. An amendment that fundamentally alters the purpose of those policies (i.e., shifting from agricultural preservation to urban expansion) cannot be deemed “consistent” without explicit findings of infeasibility, alternatives analysis, and mitigation measures. None of those findings are present in the staff report.

#### D. Resulting Internal Inconsistency

Because the proposed amendment contradicts mandatory agricultural preservation and boundary-stability policies within the County’s certified LCP, it would create an internal inconsistency that undermines the integrity of the entire program. The Commission should not certify an LCP amendment that renders key existing policies ineffective or self-contradictory. Doing so would set a precedent for piecemeal erosion of the LCP framework that has long protected the Carpinteria Valley.

For these reasons, the City urges the Commission to find that the proposed amendment is inconsistent with the County’s certified LCP and cannot be certified under the standards of PRC § 30512 and 14 CCR § 13542.

### V. SUBSEQUENT MINISTERIAL APPROVAL OF THE DEVELOPMENTS

#### A. Projects Will Bypass Public Review and Inter-Agency Coordination

Certification of the County’s proposed LCP amendment would allow future residential development on the Bailard, Van Wingerden 1, and Van Wingerden 2 sites to proceed ministerially, under State housing law provisions that mandate “use-by-right” processing for qualifying affordable or density-bonus projects. As a result, once the Coastal Commission certifies the amendment and the zoning maps are changed, neither the Commission nor the City would retain any discretionary authority to:

- Review site-specific Coastal Act consistency;
- Require a discretionary Coastal Development Permit;
- Evaluate or mitigate impacts to agriculture, visual resources, or public infrastructure; or
- Ensure conformance with the County's Agricultural Enterprise Ordinance, Right-to-Farm policy, or Coastal Zoning Ordinance design standards.

This procedural outcome effectively transfers Coastal Act compliance from a discretionary review process to a ministerial checklist, eliminating the public hearings, environmental review, and agency coordination that have historically safeguarded the Carpinteria Valley's coastal resources.

#### B. No Mechanism to Ensure Compliance with Coastal Act or Other Policy Requirements

The Coastal Act is implemented primarily through discretionary review and findings processes. Until now, that has been the mechanism to ensure that the principles embodied in Coastal Act §§ 30241-30251 (including agricultural preservation, avoidance of urban sprawl, and protection of scenic resources) are upheld at the project level. The CCC staff report references "objective development standards" as a safeguard for ministerial approvals. However, the County's current Design Residential (DR) Zone standards address only building height, setbacks, and coverage. They do not include objective coastal resource protection standards related to agriculture, scenic views, or public access.

In fact, the CCC added a modification to the County's Housing Bill Implementation Ordinance in 2024<sup>3</sup> to "require the County to submit an LCP amendment within three years from the certification date of the subject amendment to incorporate coastal resource protection and hazard minimization development standards that are objective standards to ensure that qualifying projects subject to only the objective standards of the LCP under state housing laws are consistent with the Coastal Act to the maximum extent feasible." Until the County adopts, and the Commission certifies those required standards, any development on these rezone sites would proceed without objective criteria ensuring Coastal Act consistency.

Moreover, under the State Density Bonus Law (Gov. Code §65915), applicants may seek waivers of development standards that physically preclude the desired density. In practice, this means even the limited height, setback, and coverage standards of the DR Zone could be relaxed or waived entirely—leaving no enforceable measures to protect agricultural buffers, scenic resources, or adequate coastal access parking.

Under the County's proposed framework, a developer could submit plans for high-density housing adjacent to active farmland, and the County would be obligated to approve it ministerially if it met basic "objective standards." No public notice, environmental analysis, or coordination with the City would occur. This would prevent the Commission, the City, or neighboring agricultural operators from addressing basic issues such as:

- Drainage, flood, and stormwater conflicts affecting downstream City facilities;
- Traffic and access design affecting Monte Vista Park and City intersections;

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<sup>3</sup> See LCP-4-STB-24-0027-1-Part A at <https://documents.coastal.ca.gov/reports/2024/12/Th12a/Th12a-12-2024-report.pdf>

- Visual screening and height transitions to protect public views; and
- Compatibility with adjacent agricultural operations and buffer standards required by the certified Agricultural Enterprise Ordinance.

The result is that future development could conflict with multiple Coastal Act and LCP policies in implementation, even if the LCP amendment appeared to be consistent on paper.

#### C. Case in Point: Bailard Site Analysis

The City's September 16, 2024 letter to the County (included in Attachment C) documents the numerous legal and technical deficiencies of the Bailard Multifamily Housing Project, which is the first likely project to advance under this contemplated ministerial framework.

Those deficiencies include:

- Encroachment into City-owned right-of-way and Monte Vista Park;
- Inadequate traffic, hydrology, and storm-drain analyses;
- Conflicts with height and visual compatibility standards; and
- Inconsistencies with City and County coastal policies protecting agriculture and community character.

If the proposed LCP amendment is certified, the County would be obligated to approve the same or similar project without discretionary review, notwithstanding these unresolved issues. This vividly illustrates how the loss of permit authority would produce tangible violations of Coastal Act policies.

#### D. Ministerial Processing Is Inappropriate in Sensitive Coastal Resource Areas

The City recognizes that ministerial, "by-right" permitting can be a useful tool for implementing State housing law when applied to infill or previously developed sites within established urban areas. Indeed, the City's own recently certified Housing Element LCP amendment included such provisions for downtown properties that are already urbanized and do not implicate sensitive coastal resources. In those contexts, objective standards and by-right review can effectively streamline housing production while remaining consistent with the Coastal Act.

However, the County's proposed rezonings differ fundamentally in location and context. They apply ministerial permitting to undeveloped rural and agricultural lands at the City's edge, where site-specific review is essential to protect agriculture, visual resources, and community character. Applying "use-by-right" processing in these locations would remove the only mechanism available to ensure compliance with the Coastal Act and the County's own LCP standards governing buffers, scenic compatibility, and agricultural viability.

The Commission has long recognized that LCP amendments allowing ministerial approvals must still provide safeguards for sensitive resource areas. Here, the proposed amendment, and CCC staff's modifications, offer no such safeguards. By extending by-right processing into the Carpinteria Valley's rural fringe, it would eliminate discretionary oversight precisely where

resource conflicts are greatest, thereby creating a clear inconsistency with the Coastal Act's implementation framework.

In short, ministerial permitting may be appropriate for urban infill, but its application to rural agricultural lands within the coastal zone would circumvent the Coastal Act's protective structure and result in unmitigated resource impacts.

➤ Summary

Certification of the County's amendment would result in the irretrievable loss of Coastal Act oversight for some of the most sensitive lands in the Carpinteria Valley. Once the rezones take effect, subsequent projects could proceed without public notice, without environmental review, and without any mechanism to ensure compliance with the Coastal Act or the County's own certified LCP. This outcome alone provides an independent and compelling basis for the Commission to deny certification of the proposed amendment.

Further documentation of these implications, including the City's Bailard Site Summary, is provided in Attachment A.

## VI. OTHER CONSIDERATIONS

### A. Inadequate Parking and Coastal Access

The proposed rezonings also raise broader Coastal Act concerns related to parking availability and public access within the coastal zone. The Coastal Act requires that development provide adequate parking and maintain circulation patterns that support public access and community livability. However, the high-density residential projects anticipated under these rezones would likely underprovide on-site parking due to the application of the State Density Bonus Law, which permits significant parking reductions and waivers. In these locations, where on-street parking is already heavily utilized, further shortages would displace vehicles onto surrounding local roads and exacerbate existing congestion. The Commission has consistently required the City of Carpinteria to maintain adequate parking for coastal residents and visitors to prevent precisely these conflicts. The absence of comparable parking provisions in the County's proposed amendment represents an additional inconsistency with the Coastal Act's policies for balanced access and circulation in coastal communities.

### B. Opportunities for Affordable Housing Within the Agricultural Zone

The City acknowledges and supports the State's goal of expanding affordable and workforce housing. Importantly, the County already has a mechanism within its certified Coastal Zoning Ordinance to facilitate new housing opportunities in the agricultural zone: the Farmworker Housing Complex provisions (CZO § 35-144.P). These provisions allow development of high-density farmworker housing through a Coastal Development Permit, ensuring that agricultural and housing objectives can coexist without changing land-use designations or displacing productive farmland.

Accordingly, the Van Wingerden 1 and 2 sites could accommodate needed agricultural or affordable housing under existing zoning through this process, without the broad rezones now proposed. Using this pathway would achieve the County's housing objectives while maintaining consistency with Coastal Act §§ 30241–30242 and avoiding the loss of agricultural soils that the Commission has consistently sought to protect.

### C. Violation of LAFCO Agricultural Preservation Policies

The proposed LCP amendment would also conflict with Santa Barbara County Local Agency Formation Commission's (LAFCO's) Agricultural and Open Space Preservation Policies, which direct local agencies to avoid urban expansion into agricultural lands and to maintain clear boundaries between city and county jurisdictions. Any extension of urban services to the Van Wingerden or Bailard sites, such as sewer connections to the Carpinteria Sanitary District or water supply from Carpinteria Valley Water District, would require annexation or out-of-agency service agreements inconsistent with LAFCO's adopted policies. These conflicts further illustrate the absence of coordinated regional planning and highlight the risk of fragmented governance that the Coastal Act (§ 30250) was designed to prevent.

### D. Alternative Housing Sites Exist Within Existing Urban Areas

The City recognizes that the County of Santa Barbara has already identified and entitled sufficient housing capacity to satisfy its 6th Cycle Regional Housing Needs Allocation ("RHNA"), even without the proposed Carpinteria Valley rezonings. However, the City also understands that the County seeks to distribute some of its planned housing growth more evenly across Supervisorial Districts to provide geographic equity and future flexibility in housing production.

The City supports this goal and does not object to additional upzoning within the unincorporated South Coast, provided it occurs in areas that are already urbanized and well-served by infrastructure and neighborhood amenities. Unincorporated communities such as Summerland, Montecito, Toro Canyon, and Mission Canyon contain existing development, transit access, and proximity to grocery stores, schools, and other services.

Directing future housing to these urbanized areas would:

- Align with Coastal Act § 30250, which requires that new development be sited within or adjacent to existing developed areas able to accommodate it;
- Avoid conversion of prime agricultural and scenic coastal resources in the Carpinteria Valley;
- Locate housing closer to the primary job centers on the South Coast; and
- Advance the State's housing and equity goals while maintaining the integrity of long-established urban-rural boundaries.

By contrast, the Bailard and Van Wingerden sites lack access to essential neighborhood-serving services and facilities. Unlike other South Coast communities where residents can walk or bike to grocery stores, schools, medical offices, and parks, these sites are isolated from most daily amenities and would rely almost entirely on automobile travel. This pattern of dispersed development would increase vehicle miles traveled (VMT) and greenhouse gas emissions, contrary to the Coastal Act's sustainable development and transportation efficiency policies (§ 30250).

In short, the City is not opposing the County's intent to plan for additional housing capacity in the South Coast, but urges that it occur in urbanized unincorporated communities—not on rural agricultural lands that the Coastal Act and LCP have long protected from urban encroachment.

#### E. Need for Continued Coordination and Mitigation of Inter-Jurisdictional Impacts

Because the proposed County rezones would generate additional demands on City-owned and maintained facilities (including roads, parks, and public safety services) the City has repeatedly requested formal coordination to mitigate these cross-boundary impacts.

To date, no mechanism has been identified to address:

- Traffic and circulation impacts on City streets and intersections;
- Park and recreational facility demand generated by new residents; and
- Infrastructure capacity and maintenance obligations borne by City ratepayers.

The City respectfully requests that the Commission, in addition to denying the certification of this LCP Amendment, affirm that any future regional housing efforts in the Carpinteria Valley include formal inter-jurisdictional coordination and equitable mitigation measures to prevent the displacement of costs or burdens onto City residents.

### VII. CONCLUSION AND REQUEST FOR COMMISSION ACTION

For nearly 50 years, the California Coastal Commission, the County of Santa Barbara, and the City of Carpinteria have worked together to protect the agricultural and scenic integrity of the Carpinteria Valley, maintaining a stable urban–rural boundary that embodies the balance envisioned by the Coastal Act. The proposed County LCP amendment would dismantle that legacy by allowing urban-intensity development on rural and agricultural lands outside the City’s border. These are lands the Commission has long recognized as essential to the Valley’s unique coastal character and resource base.

As detailed in the sections above and the supporting materials attached, the amendment fails to demonstrate consistency with multiple Coastal Act policies, including but not limited to:

- § 30241 (Protection of Prime Agricultural Lands),
- § 30242 (Conversion of Non-Prime Agricultural Lands),
- § 30250 (Location of New Development), and
- § 30251 (Protection of Scenic and Visual Qualities).

The County’s own certified LCP policies 8-1 and 8-3, as well as its Agricultural Enterprise Ordinance, mirror these statutory directives and further underscore the inconsistency of extending high-density urban zoning into the Valley’s agricultural landscape. Moreover, because the proposed amendment would result in ministerial approval of future housing projects, it would eliminate the discretionary review necessary to ensure ongoing compliance with these policies, foreclosing the Commission’s ability to protect coastal resources in the future.

The City of Carpinteria therefore respectfully requests that the Commission **deny certification** of the portion of Item Th11a (LCP-4-STB-24-0028-1) pertaining to the Bailard, Van Wingerden 1, and Van Wingerden 2 sites within the Carpinteria Valley.

The City remains committed to collaborating with the County, the Commission, and community partners to advance affordable and workforce housing in a manner that is environmentally responsible, consistent with the Coastal Act, and reflective of the South Coast's shared planning values.

We appreciate the Commission's careful consideration of these concerns and stand ready to provide any additional information or analysis that may assist the Commission in its deliberation.

Respectfully submitted,

  
\_\_\_\_\_  
Nick Bobroff, Director  
Community Development Department

Enclosures:

Attachment A - Supplemental and Additional Information Supporting the City's Letter  
Attachment B - Previous Letters the City Provided the County

Cc. Denise Gonzalez ([Denise.Gonzalez@coastal.ca.gov](mailto:Denise.Gonzalez@coastal.ca.gov))  
Lisa Plowman, Planning Director ([lpowman@countyofsb.org](mailto:lpowman@countyofsb.org))  
Natalia Alarcon, Mayor of Carpinteria ([NataliaAlarcon@carpinteriaca.gov](mailto:NataliaAlarcon@carpinteriaca.gov))  
Michael Ramirez, Carpinteria City Manager ([MichaelR@carpinteriaca.gov](mailto:MichaelR@carpinteriaca.gov))

Attachment A  
Supplemental and Additional Information Supporting the  
City of Carpinteria Letter

October 31, 2025

## **I. Overview and Purpose**

This Attachment provides the technical and policy foundation for the City of Carpinteria's opposition to the County of Santa Barbara's proposed Local Coastal Program ("LCP") amendment to rezone the Van Wingerden 1, Van Wingerden 2, and Bailard sites within the Carpinteria Valley. It is intended to supplement the City's main opposition letter to the California Coastal Commission for consideration at the Commission's November 6, 2025 hearing. The materials and analyses presented here demonstrate that certification of the proposed LCP amendment would:

- Conflict with multiple provisions of the California Coastal Act
- Contradict the County's (and City's) certified LCP policies
- Disregard the City's consistent efforts at inter-jurisdictional coordination
- Create a precedent for high-intensity, ministerially approved development without necessary resource-protection standards

This Attachment organizes the City's supporting evidence and analysis in seven sections. It begins with clarification of the incorrect residential yield calculations contained in the Coastal Commission ("CCC") staff report, followed by a review of applicable Coastal Act provisions, detailed site-specific analyses, a summary of significant and unavoidable impacts documented in the County's PEIR, and an explanation of inconsistencies with the City's certified CLUP. It concludes with a statement of the City's request that the Commission deny certification of the County's proposed LCP amendment to protect the long-standing agricultural, scenic, and small-town character of the Carpinteria Valley.

## **II. Incorrect Residential Yield for Rezone Sites in the CCC Staff Report**

Page 12 of the CCC staff report includes a table showing the potential residential yield for the three proposed Carpinteria Valley rezone sites. However, City staff could not find the basis for the numbers that were presented. The City's analysis, summarized in Table 1, applies the proposed densities to the actual gross site acreages. Two additional columns include State Density Bonus Law ("SDBL") scenarios for mixed-income projects (+35% and +50%)<sup>1</sup>. These calculations show that total residential build-out could be much higher than reported by CCC staff.

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<sup>1</sup> Density Bonus scenarios per Gov. Code §65915: mixed-income projects commonly realize +35%; the max for mixed-income is +50%.

**Table 1 – Comparison of CCC Staff vs. City Residential Yield Calculations**

Site & APN(s)	Acres	Existing Zone	Proposed Zone	CCC Staff's Unit Calculation	City's Unit Calculation			
					Min	Max	+35% Density Bonus	+50% Density Bonus
<b>Van Wingerden 1</b> (004-013-023)	15.1	Agriculture (A)-I-5	Design Residential (DR) – 20/30	236	302	453	≈ 408 – 612	≈ 453 - 680
<b>Van Wingerden 2</b> (004-005-001)	9.68	Agriculture (A)-I-10	Design Residential (DR) – 20/30	180	193	290	≈ 261 – 392	≈ 290 - 435
<b>Bailard</b> (001-080-045 and 001-080-046)	6.98	Single Family Residential 3-E-1	Design Residential (DR) – 20	182*	139	139	≈ 188	≈ 209

\* It is not clear why this total was above the maximum, unless County and CCC staff were using the existing Builder's Remedy Application for Bailard, which proposes 182 units.

The text on Page 12 of the CCC staff report states that the County “conservatively calculated” residential capacity by applying *minimum* densities rather than maximums (though as shown, the unit count for Bailard is well over the maximum), citing possible site constraints such as wetlands, steep slopes, or environmentally sensitive habitat areas (“ESHAs”). However, this reasoning is internally inconsistent with the policy and procedural framework that will actually govern these sites. Each of the three Carpinteria Valley rezone parcels is expected to be developed ministerially, without discretionary Coastal Development Permit review or site-specific environmental avoidance requirements. As such, there is no regulatory mechanism that would reduce buildout potential due to environmental constraints—the very premise staff relies upon to justify using lower densities.

Compounding this inconsistency, Modification No. 1 (Page 9) of the CCC staff report specifies that the density of these sites “shall be determined using the Design Residential (DR) Zone’s minimum and maximum numbers as applied to the gross acre.” Applying densities to *gross acreage*, rather than net developable area, would typically yield higher buildout numbers. Yet staff simultaneously assumes lower densities in its “conservative” calculation. These two assumptions directly conflict and further obscure the realistic development potential of the sites.

In this context, a truly “conservative” analysis should have applied maximum allowable densities to capture the realistic buildout potential that will occur once ministerial approvals and the SDBL are applied. By using minimum densities instead, the staff report substantially understates the magnitude of foreseeable impacts—particularly to agricultural land, visual resources, and public services—while simultaneously overstating the County’s need for additional rezone capacity.

The cumulative result is a misleading representation of both site capacity and potential impacts. Because these erroneous yield estimates form the analytical foundation for the

staff's Coastal Act findings, every subsequent impact conclusion—including those addressing agricultural conversion (§§ 30241–30242), urban sprawl (§ 30250), and scenic resource protection (§ 30251)—is likewise understated.

### **III. Coastal Act**

#### **A. Certification of the County's Rezone Sites Would Come Before Objective Standards Are in Place**

The California Coastal Act allows the Commission to delegate project-level review to local governments only when an approved LCP contains objective, enforceable standards adequate to protect coastal resources.

When the Commission certified the County's Housing Bill Implementation Ordinance ([LCP-4-STB-24-0027-1-Part A](#)) on December 12, 2024, it found that the amendment, as originally submitted, removed subjective coastal-resource protections without replacing them with objective equivalents. Specifically, the County's new "Objective Design Standards" section (CZO § 35-144B) addressed only aesthetic and site-planning issues such as building massing, landscaping, and lighting, but omitted objective criteria for resource protection and hazard minimization—for example, agricultural buffers, scenic-view protections, and coastal-hazard setbacks.

As a condition of certification, the Commission adopted Suggested Modification No. 2, requiring the County to return within three years with a subsequent LCP amendment that would establish objective coastal-resource and hazard-minimization development standards. That follow-up amendment has not yet been prepared or certified.

If the Commission were now to certify the current rezone amendment, the County could approve high-density residential projects ministerially on the three Carpinteria Valley sites before any of the required objective resource-protection standards exist. These projects would instead be governed only by the Design Residential (DR) zoning provisions, which contain basic dimensional standards—height, setbacks, and lot coverage—but no objective criteria to ensure consistency with Coastal Act mandates for agricultural preservation, scenic resource protection, or public access.

Moreover, under the State Density Bonus Law (Gov. Code § 65915), applicants may obtain waivers or reductions of local development standards that physically preclude the desired density. In practice, even the limited DR-zone standards could be relaxed or eliminated, leaving no enforceable safeguards for agricultural buffers, scenic resources, or parking adequacy.

Certifying the present rezone amendment would therefore outpace the adoption of the resource-protection framework the Commission itself required in 2024 and would delegate ministerial authority without the necessary Coastal Act guardrails.

## B. Coastal Act Policies and Resulting Conflicts

The proposed County amendment conflicts with multiple provisions of the Coastal Act, as summarized below.

**Table 2 – Coastal Act Consistency Analysis**

<b>Statute</b>	<b>Requirement</b>	<b>Conflict Created by Proposed Amendment</b>
§ 30241 – Protection of Prime Agricultural Lands	Maintain maximum amount of prime land in production; conversion only if continued use infeasible and conversion contributes to a stable urban limit.	Conversion proposed where active open field and greenhouse agriculture continues; no infeasibility findings; no stable urban limit maintained.
§ 30242 – Conversion of Non-Prime Agricultural Lands	Conversion allowed only if continued or renewed agriculture infeasible and if conversion will not impair surrounding agricultural viability.	No evidence of infeasibility; adjacent farms would face land-use conflicts, loss of buffers, and increased reverse-sensitivity pressures.
§ 30250 – Location of New Development	New development must be sited within or contiguous to existing developed areas able to accommodate it and avoid cumulative resource impacts.	Sites are rural, separated from existing neighborhoods by creeks and farmland; would constitute isolated, leap-frog urbanization.
§ 30251 – Scenic and Visual Qualities	Protect scenic and visual character of coastal areas and minimize alteration of natural landforms.	Multi-story buildings on these sites would intrude into prominent views of the Carpinteria Valley and foothills; no discretionary design review would occur under ministerial processing.
§ 30252 – Public Access and Transportation	Maintain and enhance public access by providing adequate parking and transportation facilities.	High-density projects could rely on SDBL parking reductions, displacing vehicles onto rural roads and reducing visitor-serving parking capacity.
§ 30260 – Coastal-Dependent Development	Priority for coastal-dependent and coastal-related uses.	Replacing viable agriculture with high-density housing displaces a long-established coastal-related use and reduces agricultural employment opportunities.

As shown in Table 2, The proposed amendment would authorize residential densities and heights that the County’s certified LCP and the Coastal Act were expressly designed to avoid in the Carpinteria Valley. Without objective resource-protection standards or discretionary review authority in place, the County could not ensure compliance with any of these statutory directives. Certification at this stage would therefore be premature and inconsistent with the Coastal Act and the Commission’s own 2024 certification conditions.

#### **IV. City Staff's Analysis of the Three Rezone Sites**

##### **A. Van Wingerden 1 (Most Inconsistent with the Coastal Act and City Policy)**

###### Overview:

Van Wingerden 1 (VW1) is the most severely inconsistent rezone site. It proposes high-density residential use on active, highly productive farmland located outside the urban boundary and is identified as "Prime Farmland" and "Farmland of Statewide Importance" according to the California Department of Conservation. The VW1 site is bordered by active agriculture on two sides; on the other two sides where the site abuts existing urban development, the established residential densities range from approximately 7 dwelling units per acre (du/ac) to 16 du/ac. Access would occur via either a narrow private agricultural driveway or through a low-density single-family neighborhood, neither of which is suitable for the expected traffic volumes of a multifamily project. A previously-identified, and Coastal Commission acknowledged, creek/wetland feature exists along the southern boundary of the site, shared with the Church of Nazarene property.

###### Key Coastal Resource Conflicts:

**Agriculture (PRC §§30241, 30242):** The parcel contains prime soils and active agricultural production, yet no feasibility analysis has demonstrated that continued use is infeasible. Conversion here would directly breach the longstanding agricultural greenbelt separating the urban core from the foothills, undermining a stable urban limit.

**Visual and Scenic Resources (PRC §30251):** The site lies in the highly visible Carpinteria Valley viewshed. Redevelopment at urban density would introduce building heights and lighting incompatible with the rural, open-field character that defines the Valley.

**Land Use and Cumulative Impacts (PRC §30250):** Urbanization at VW1 would represent a "leapfrog" intrusion, lacking contiguity with developed neighborhoods. Once developed, it would set a precedent for further inland conversions.

**Public Services and Circulation:** The narrow access routes cannot safely accommodate project traffic or emergency vehicles. Neither alignment could feasibly be improved to current standards without major right-of-way acquisition or neighborhood impacts.

**Creek and Wetland Impacts:** Redevelopment to urban land uses would further impair an identified wetland/riparian drainage feature with direct hydrologic connectivity to the Carpinteria Salt Marsh.

City and Planning Principles:

The VW1 site's conversion would break the agricultural buffer the City's Coastal Land Use Plan (CLUP) has preserved for nearly 50 years (Policies LU-4a, LU-3n). The resulting land-use pattern would be fundamentally inconsistent with both the Coastal Act's agricultural protection mandate and the City's compact, small-town urban form policies.

Result:

The site should be removed from consideration for rezone certification. Conversion of VW1 would irreversibly erode the agricultural, scenic, and circulation framework that defines the Carpinteria Valley's coastal zone identity.

B. Van Wingerden 2 (Substantial Inconsistencies and Cumulative Risks)

Overview:

Van Wingerden 2 (VW2) lies east of VW1, separated from existing neighborhoods by Franklin Creek and additional farmland. Like VW1, it remains in agricultural use and is topographically and visually part of the rural Valley floor.

Key Coastal Resource Conflicts:

**Agriculture:** VW2 is identified by the DOC as "unique farmland," is improved with greenhouse facilities, and contributes to the continuous agricultural belt between the City and foothills. Its conversion would increase edge effects and pesticide conflicts on adjoining farms.

**Habitat and Drainage:** The site's proximity to a protected creek corridor raises concerns about flood hazards and stormwater runoff. The County PEIR identified stormwater and biological impacts as potentially significant and unavoidable for agricultural rezone sites of this type.

**Infrastructure and Services:** The site lacks direct access to major roadways and would depend on rural routes not designed for multifamily density. Water and sewer extensions would be required, inconsistent with PRC §30250 and County CLUP Policy 2-10 restricting service expansion into rural areas.

**Visual and Scenic Resources:** The site is within the same scenic coastal plain as VW1. Urban-scale massing would interrupt the agricultural landscape visible from Highway 101, contrary to PRC §30251.

City and Planning Principles:

The VW2 site's isolation from urban neighborhoods and adjacency to a creek corridor make it incompatible with orderly growth principles (City Policies LU-3a, LU-4a). Its development would effectively establish a new urban "island" within the coastal plain, which is precisely what the Coastal Act discourages.

Result:

The VW2 rezone cannot be supported under §§30241, 30242, or 30250 and should be deferred until the County adopts objective standards for resource protection and demonstrates adequate service and infrastructure capacity.

C. Bailard (High Intensity and Infrastructure Impacts within EDRN)

Overview:

The Bailard site (1101 and 1103 Bailard Ave.) is somewhat more proximate to the City's urban area but still lies outside the urban boundary and within a County-defined Existing Developed Rural Neighborhood (EDRN). The proposed multifamily project for 182 units in seven buildings up to 46 feet tall was already found by the County itself to be inconsistent with multiple Coastal Act and County LCP policies (see County's letter in Attachment B).

Key Coastal Resource Conflicts:

**Agriculture:** The property is still actively farmed with row crops. The northern boundary abuts prime farmland (AG-I-10). The project requests proposes to use an SDBL waiver to eliminate the required 200–300-foot agricultural buffer, reducing it to zero. The County determined that the proposal could adversely affect adjacent prime agricultural lands and that the project's Farmland Impact Study was insufficient to demonstrate consistency

**Infrastructure and Services:** The County found the project lacked adequate evidence of roadway capacity, drainage, and emergency access compliance with County design standards. It also requires annexation into the Carpinteria Sanitary District and extension of sewer lines into a rural area.

**Visual and Community Character:** The City's letter to the County noted the proposed building heights (up to 46 feet) would make these the tallest buildings in the entire Carpinteria Planning Area, inconsistent with the City's 30-35 foot height limit, the County's own Design Residential height standards (35 feet max.), and the small-town coastal character policies (LU-3, CD-1, CDS4-a, CDS4-b).

**Public Access and Parking:** The proposed roundabout and site improvements would occupy City right-of-way and potentially reduce public parking at Monte Vista Park, requiring mitigation under the City's Open Space and Public Facilities policies.

City and Planning Principles:

While closer to urban infrastructure, the Bailard site's high intensity, agricultural adjacency, and service extension requirements still conflict with the Coastal Act's siting and resource protection standards. The City's review found the project inconsistent with multiple GP/CLUP policies on urban containment, agricultural buffers, community design, and public facility impacts

Result:

Although less rural than VW1 or VW2, Bailard demonstrates how the County's rezone approach encourages excessive intensity, inadequate infrastructure planning, and erosion of the agricultural edge. The project should not proceed until the County adopts objective LCP standards for height, buffer, and service limitations consistent with the City's certified CLUP.

**V. Findings of the County's Final PEIR (March 2024) – Significant and Unmitigable Impacts and Overriding Findings**

The County's Final Program Environmental Impact Report ("PEIR") for the 2023–2031 Housing Element program (certified March 2024) is an important part of the record because it confirms, rather than resolves, the core concerns the City is raising to the Coastal Commission. The PEIR openly acknowledges that implementing the County's rezone program will result in significant and unavoidable impacts to agricultural resources, land use compatibility, visual/scenic resources, and public services, even after the application of all feasible mitigation.

**A. Relevant Significant and Unavoidable Impacts**

The PEIR identifies the following impact areas as "Class I" (significant and unavoidable) for the rezone program, including the Carpinteria Valley sites:

**Agricultural Resources** – The PEIR concludes that conversion of active agricultural lands to residential uses will cause a permanent loss of agricultural production and further fragmentation of the Valley's agricultural block, and that no feasible mitigation is available to fully avoid or offset this loss.

**Land Use and Planning / Coastal Zone Consistency** – The PEIR notes that rezoning agricultural/rural sites to higher-density residential uses could result in conflicts with existing plans and policies intended to preserve agriculture and

maintain a stable urban edge. The analysis acknowledges that these conflicts may remain even after project-level conditions are applied.

**Aesthetics / Visual Resources** – The PEIR finds that the introduction of urban-scale development into rural/agricultural areas visible from public viewpoints (including U.S. 101 and local parklands) would degrade the existing visual character of the area and that such changes are not fully mitigable. This finding aligns with the City’s concern about 3-4-story buildings on otherwise open valley floor sites.

**Transportation / Circulation and Public Services** – The PEIR recognizes that new high-density housing in outlying or semi-rural locations will increase vehicle trips on local roadways and add demand on water, wastewater, and park facilities that may be owned or maintained by the City of Carpinteria or other special districts. Because these improvements would require off-site or inter-jurisdictional solutions, the PEIR treats several of these impacts as significant and unavoidable.

#### B. No “Coastal Act Cure” in the PEIR

The County’s PEIR is a program-level CEQA document; it does not — and cannot — make the determinations the Coastal Act requires for conversion of prime or non-prime agricultural lands (PRC §§ 30241–30242), for siting development within or contiguous to existing developed areas (PRC § 30250), or for protection of scenic and visual qualities (PRC § 30251). In other words, the fact that the County studied the impacts and adopted a Statement of Overriding Considerations does not make the impacts consistent with the Coastal Act.

For the Coastal Commission, the PEIR actually underscores the problem: the County’s own environmental document says these impacts cannot be fully mitigated. Certifying an LCP amendment that knowingly produces those same impacts — and then allowing projects to be approved ministerially — would leave the Commission without any future opportunity to avoid, minimize, or condition development to protect coastal resources.

#### C. Statement of Overriding Considerations vs. Coastal Act Findings

To move its housing program forward, the County Board of Supervisors adopted a Statement of Overriding Considerations (SOC), essentially saying that the County’s housing goals outweigh the significant, unmitigated impacts identified in the PEIR. That is permissible under CEQA. It is not a substitute for a Coastal Act consistency finding.

The Coastal Act does not allow coastal resource protections — especially for prime agriculture, stable urban-rural boundaries, and scenic coastal landscapes — to be set aside simply because a local agency has other policy goals. Where the PEIR

says “significant and unavoidable,” the Commission must ask: Has the County shown that continued or renewed agricultural use is infeasible on these particular parcels, and has it shown that urbanizing them will not impair surrounding agricultural viability? On this record, it has not.

#### D. Omission of a “Reduce Coastal Impacts” Alternative

The County did not evaluate an alternative that would retain Carpinteria Valley agricultural sites and meet housing needs elsewhere in the unincorporated South Coast (estimated to be a few hundred square miles of land). Alternative 2 would have removed the two Van Wingerden sites, but that option was not selected. Alternative 3 (Option A) was identified as environmentally superior, even though it did not actually reduce coastal agricultural impacts. In other words, the environmentally superior alternative did not include any consideration of reducing significant unavoidable impacts to coastal resources. Yet, housing capacity could have easily been accommodated in already urbanized unincorporated areas in the coastal zone (Summerland, Montecito, Toro Canyon). That omission is important because a feasible, less coastal-impactive alternative clearly exists, but it was not evaluated or considered.

#### E. Relevance to the CCC’s Current Action

For purposes of the November 6, 2025 Coastal Commission hearing, the County’s PEIR should be viewed as corroborating evidence that:

1. The three Carpinteria Valley rezones will cause real, permanent, and unmitigated losses of coastal agricultural and coastal scenic resources; and
2. Those losses were accepted by the County for County-level policy reasons, not because the sites passed a Coastal-Act-level consistency test.

Accordingly, the Commission can reasonably conclude that additional coastal protections or substantial modifications are required before certification, particularly (1) deferring or removing Van Wingerden 1, (2) conditioning Van Wingerden 2 on buffers and access solutions, and (3) limiting the intensity of the Bailard site until objective coastal-resource standards are in place.

#### **VI. Conflicts with the *City of Carpinteria’s* Certified Coastal Land Use Plan (CLUP) and General Plan Policies**

Although the County’s LCP and the Coastal Commission’s review authority are separate from the City of Carpinteria’s certified Coastal Land Use Plan, the City’s policies remain directly relevant in illustrating the disconnect between what the

Commission has long required within City limits and what is now being proposed immediately outside them.

For nearly five decades, the City's certified CLUP has implemented the Coastal Act's core principles—maintaining a compact urban form, preserving prime agricultural lands, protecting scenic and visual resources, and ensuring safe, well-planned circulation and public access.

The County's proposed rezones, located immediately adjacent to the City boundary, would create precisely the kinds of impacts and urban sprawl the City's plan was designed to prevent, thereby highlighting a significant inconsistency in coastal resource protection across the same shared landscape.

#### A. Agricultural and Urban-Rural Boundary Policies

##### Relevant City Policies:

- LU-1d – Ensure that the type, location, and intensity of land uses adjacent to parcels designated Agriculture are compatible with those resources and not detrimental to them.
- LU-3n – Require setbacks and buffers between agricultural and urban uses; responsibility lies with the property intensifying its use.
- Policy LU-4a: Establish a greenbelt of open space including undeveloped land and open-field agricultural land surrounding the City.
- OSC-9e – Avoid conversion of agricultural land except where consistent with Coastal Act §§ 30241–30242.
- PF-5g – Plan and size public facilities to discourage expansion of urban development beyond the City's urban/rural transition area

##### Conflict:

All three rezone sites lie beyond the City's defined urban limit line, within the agricultural matrix that buffers the foothills. Converting these lands to high-density residential use would violate the City's long-standing containment policy by extending infrastructure and housing into the rural area and removing the agricultural setbacks required by LU-3n. At the Bailard site, the County's own record acknowledges the applicant's request to eliminate the agricultural buffer entirely, directly contravening the City's policy that urban development must shoulder the responsibility for buffering adjacent farmland.

## B. Visual and Community Character Policies

### Relevant City Policies:

- Objective LU-3 – Preserve the small beach-town character and avoid sprawl at the City's edge.
- Policy LU-3a: New development shall occur contiguous to existing developed areas of the city. Higher density in certain residential neighborhoods and for residential uses in commercial districts shall be provided as a means to concentrate development in the urban core consistent with zoning designations, particularly where redevelopment of existing structures is proposed.
- CD-1 – Ensure that building size, scale, and form are compatible with adjacent neighborhoods.
- CDS4-a and CDS4-b – Require new development at the City's edges to include rural and semi-rural design elements that provide an appropriate transition to the countryside

### Conflict:

The Van Wingerden sites would introduce three- and four-story multifamily structures amid low-scale agricultural landscapes visible from U.S. 101 and the foothills. Such height and massing are inconsistent with the City's 30-foot limit and small-town design ethos. The Bailard project would be the tallest in the Carpinteria Planning Area, breaking the established visual rhythm of the coastal plain. Collectively, the rezones would erode the rural visual transition and create a disjointed skyline inconsistent with Policies CD-1 and CDS4-b.

## C. Circulation, Parking, and Public Access Policies

### Relevant City Policies:

- Circulation Element (C-2 and C-4 series) – Require that new development maintain adequate street capacity and safe access; improvements must conform to City design standards.
- LU-3i – Ensure adequate public services, including parking, to support development without burdening existing neighborhoods.

Conflict:

The proposed high-density developments lack sufficient on-site parking, especially when considering the State Density Bonus Law's automatic parking reductions. Parking spillover into nearby neighborhoods and parks, such as Monte Vista Park adjacent to Bailard, would degrade public access opportunities and contradict the City's practice of maintaining generous coastal parking to ensure equitable recreation access. Additionally, the narrow access drives to VW1 and VW2 fail to meet City standards for emergency response and two-way circulation, contravening adopted street and safety design criteria

D. Inter-Jurisdictional Coordination and County Oversight

Relevant City Policies:

- LU-1f – Coordinate with the County of Santa Barbara and other agencies to ensure that land use decisions in adjacent unincorporated areas are compatible with the City's long-term plans and do not compromise agricultural preservation or scenic resources.
- LU-3o – Work cooperatively with the County and the California Coastal Commission to maintain a stable urban-rural boundary and to protect agricultural lands and open space in the Carpinteria Valley.
- Implementation Policy 70 – Require City participation in County or Coastal Commission reviews of projects within the Carpinteria Valley coastal zone to promote consistent application of Coastal Act policies.
- PF-5g – Plan and size infrastructure facilities in coordination with the County and special districts to avoid premature extension of services into rural areas.

Conflict and Lack of Coordination:

The City has repeatedly exercised these policies—submitting detailed letters and offering technical input (see Attachment B) throughout the County's Housing Element and rezone program—but the County proceeded without substantive coordination. Despite the City's early requests for joint review, interagency meetings, and agricultural viability analysis, none of the City's concerns were addressed.

This breakdown in inter-jurisdictional coordination directly contradicts both the City's certified policies and long-standing Coastal Commission guidance encouraging consistency among neighboring jurisdictions that share the same coastal resources. The City's efforts to maintain a cooperative planning framework were effectively disregarded, resulting in a proposal that undermines the City's

certified urban-rural boundary, agricultural preservation strategy, and scenic corridor protections.

Result:

By moving forward with these rezonings absent meaningful coordination, the County has not only departed from its own cooperative planning obligations but has placed the Commission in the position of approving an LCP amendment that disregards the coordinated regional framework that has preserved the Carpinteria Valley's character for nearly fifty years.

E. Policy Application and Equity

The CCC staff very recently required the City, during review of its 2025 Draft CLUP/GP Update, to strengthen policies protecting agriculture, ESHA, scenic resources, and coastal access to the maximum extent practicable. It therefore seems inequitable and inconsistent with precedent for the CCC staff to now recommend approval of an LCP amendment that would clearly weaken equivalent protections immediately adjacent to the City's boundary.

While the City's draft CLUP update would ensure that all new development within its limits is low-scale, low-impact, buffered, and visually subordinate, the County's proposed rezones would permit tall, high-intensity projects on the opposite side of the line without equivalent standards or even discretionary review / oversight. The result would be a fractured regulatory landscape, undermining decades of coordinated coastal planning and creating a two-tiered standard for resource protection in the same viewshed.

➤ Summary

Taken together, these conflicts demonstrate a fundamental breakdown in the coordinated coastal planning framework that has long preserved the Carpinteria Valley. The City's certified CLUP policies on agriculture, visual resources, circulation, and inter-jurisdictional coordination all seek to ensure that City and County actions reinforce one another in protecting the same continuous landscape. By proceeding with these rezonings absent that collaboration, and by proposing development intensities that would not be allowed within City limits, the County's amendment undermines regional consistency, equity, and the Coastal Act's mandate for coordinated coastal management. The City therefore urges the Commission to correct this imbalance through denial or substantial modification, as further discussed in Section VII below.

## VII. Conclusion and Request for Commission Action

The Carpinteria Valley is one of California's most distinctive and intact coastal landscapes — a narrow, fertile plain framed by the Santa Ynez Mountains to the north and the Pacific Ocean to the south. Its unique topography, temperate climate, and deep alluvial soils have supported continuous agricultural production for more than a century, yielding flowers, avocados, and greenhouse crops that are among the most productive per acre in the state.

Equally remarkable is the Valley's seamless blend of agriculture, nature, and small-town life. Within just a few miles lie the Carpinteria Salt Marsh Preserve, the Harbor Seal rookery, and Carpinteria State Beach and campground — all easily reached on foot or bicycle from downtown. The City's modest scale, with no buildings above three stories, creates a visually peaceful coastal setting that residents and visitors alike associate with authenticity and calm. The open fields at the City's edge frame the community, protect the scenic views from U.S. 101, and define the transition from city to countryside that has made Carpinteria known as "the world's safest small beach town."

Introducing three large, dense, and visually intrusive residential enclaves into this landscape would **fundamentally alter that balance**. Instead of reinforcing the Valley's harmony between agriculture and community, the proposed rezonings would puncture it — replacing open space and cultivated fields with tall, urban-scale development discordant with the City's coastal identity.

For nearly fifty years, the City of Carpinteria, the County of Santa Barbara, and the California Coastal Commission have shared a unified vision for the Carpinteria Valley — to preserve its irreplaceable agricultural base, maintain a clear and permanent urban-rural boundary, and protect the scenic, small-town coastal character that defines this stretch of the South Coast. The County's proposed rezoning of the Van Wingerden 1, Van Wingerden 2, and Bailard sites would dismantle those long-standing planning principles.

The record demonstrates that:

- The rezonings would convert productive agricultural lands and rural open space to urban densities without any showing that agricultural use is infeasible, in direct conflict with Coastal Act §§ 30241 and 30242.
- The proposed developments are not contiguous with existing neighborhoods and would extend urban infrastructure into the rural valley, contrary to § 30250 and the County's own LCP policies limiting service expansion.
- The projects would introduce large-scale buildings visible from U.S. 101 and the foothills, degrading the scenic and visual qualities protected by § 30251.

- The County's PEIR found these impacts to be significant and unavoidable and explicitly relied on a Statement of Overriding Considerations, confirming that no feasible mitigation exists.
- The Commission's December 2024 certification of the Housing Bill Implementation Ordinance required the County to return with objective coastal-resource protection standards before relying on ministerial approvals — yet no such standards exist today.

Certifying these rezonings now would therefore delegate ministerial permitting authority to the County without enforceable safeguards, allowing irreversible impacts to occur before the Coastal Act's protective framework is in place.

**The City also recognizes and strongly supports the State's goal of increasing housing supply, particularly affordable and workforce housing in coastal communities.** The City has undertaken its own comprehensive LCP amendments to enable new housing within its downtown and other urbanized areas where infrastructure, transit, and services already exist. Our position is not anti-housing; it is pro-sustainability. Housing in the Carpinteria Valley must be planned in harmony with the environment — in locations that protect farmland, preserve scenic views, and maintain access to the coast for everyone.

Accordingly, the City of Carpinteria strongly requests that the Coastal Commission **deny certification** of the County's proposed LCP Amendment (i.e., the rezoning of the Van Wingerden 1, Van Wingerden 2, and Bailard sites). The amendment is inconsistent with Coastal Act §§ 30241, 30242, 30250, 30251, and 30252, and approval would irreparably undermine the long-standing agricultural and scenic resource protections that define the Carpinteria Valley.

Should the Commission, despite these concerns, determine that modification rather than denial is necessary to advance housing goals, the City respectfully urges that any certification be substantially modified to:

- Remove the Van Wingerden 1 site entirely;
- Defer or condition Van Wingerden 2 pending adoption of objective coastal resource protection and access standards;
- Limit Bailard site intensity and height until objective resource-protection standards are certified and public-service capacity and parking adequacy are verified and resolved; and

- Require the County to complete and certify its follow-up LCP amendment establishing objective coastal-resource standards before any ministerial housing approvals are issued.

These actions would bring the amendment closer to alignment with the Coastal Act and the Commission's 2024 findings, while preserving the integrated, regional approach that has safeguarded the Carpinteria Valley for generations. The City sincerely appreciates the Commission's careful consideration of these issues and **urges denial to uphold the Coastal Act's core principles** and to ensure that future housing in the Valley remains both environmentally responsible and community-centered.

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Attachment B

Previous Letters Pertaining to the County of Santa  
Barbara Housing Element Rezones and Bailard Builder's  
Remedy Application

October 31, 2025

# **CITY of CARPINTERIA, CALIFORNIA**



February 28, 2023

Board of Supervisors

County of Santa Barbara

c/o Jessi Steele, Long Range Planning Division    Via email: [housingelement@countyofsb.org](mailto:housingelement@countyofsb.org)

Re:    Santa Barbara County Draft 2023 – 2031 Housing Element Update

Dear Chair Williams and Honorable Members of the Board of Supervisors:

The City of Carpinteria has been closely following the County Housing Element Update process. We appreciate the challenges faced by the County and other local jurisdictions, ourselves included, in crafting a Housing Element Update that satisfies our respective regional housing needs assessment (RHNA) allocations and meets HCD's high bar for certification. We recognize the need for all areas of the County to share in meeting regional housing needs and that difficult decisions must be made concerning where and how to accommodate needed housing.

The City of Carpinteria City Council offers these comments on the Draft 2023 – 2031 Santa Barbara County Housing Element in the spirit of interagency cooperation and collaboration on housing policies that best serve the Carpinteria Valley and its residents. In consideration of the need to provide the state-mandated housing and, in particular, affordable housing, in southern Santa Barbara County, we are requesting two items:

- Modifications to the proposed housing sites in the Carpinteria Valley; and
- County commitment to implement policies and programs aimed at preventing displacement and promoting affordable housing.

## **Proposed Housing Sites in the Carpinteria Valley**

Agriculture remains an important element of the Carpinteria Valley's identity and economic base, and the desire to protect and preserve the Valley's agricultural heritage going forward is critical. State Housing Element Law requirements to plan for adequate housing sites do not take precedence over the Resource Protection policies of the California Coastal Act ("Coastal Act") and as embodied in the policies and regulations of County and City's respective Local Coastal Programs ("LCPs"). Guidance from the Coastal Commission on this issue cites the need to instead harmonize State Housing laws with Coastal Act policies.

The County's Draft Housing Element fails to adequately take into account the Resource Protection policies of the Coastal Act, including Coastal Act policies embodied in the County's LCP, with regard to protection of Agricultural Resources. Numerous County and City LCP Policies address Agricultural Buffers and the need to protect agricultural lands/operations from urban residential development (see, e.g., County Article II, Section 35-144O- Agricultural Buffers, Appendix H: Agricultural Buffer Implementation Guidelines and Santa Barbara County Right to Farm Ordinance).

Our position that high density urban development is not appropriate for rural agricultural areas along the City's edges is further supported by numerous adopted policies found in both the County's and City's respective certified LCPs, including but not limited to:

**County Comprehensive Plan Agricultural Element Policy and California Coastal Act § 30241.** *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:*

- *By establishing stable boundaries separating urban and rural areas, including, where necessary, clearly defined buffer areas to minimize conflicts between agricultural and urban uses.*
- *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.*
- *By permitting the conversion of agricultural land surrounded by urban uses where the conversion of the land would be consistent with Section 30250.*
- *By developing available lands not suited for agriculture prior to the conversion of agricultural lands.*
- *By assuring that public service and facility expansions and non-agricultural development do not impair agricultural viability, either through increased assessment costs or degraded air and water quality.*
- *By assuring that all divisions of prime agricultural lands, except those conversions approved pursuant to subdivision (b) of this section, and all development adjacent to prime agricultural lands shall not diminish the productivity of such prime agricultural lands.*

**City Policy LU-3a:** *New development shall occur contiguous to existing developed areas of the city. Higher density in certain residential neighborhoods and for residential uses in commercial districts shall be provided as a means to concentrate development in the urban core consistent with zoning designations, particularly where redevelopment of existing structures is proposed.*

**California Coastal Act § 30250.** *(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.*

Specifically, in the Carpinteria Valley, sites identified as the “Van Wingerden 1” potential rezone site and the “Bailard” pending housing project, should be eliminated because of impacts to coastal agricultural lands. Wise planning practices call for higher residential densities to occur within or immediately adjacent to the urban core. City and County land use policies and the Coastal Act support these practices. These two sites contradict this fundamental principle by proposing the highest densities found in the Carpinteria Valley at the very edge of the City, outside the urban-rural boundary, at significant distance from the urban core, with no immediate access to pedestrian, bicycle and public transit routes, and not within reasonable walking distance to grocery shopping and other necessities and conveniences of daily living.

We also do not believe that these sites have the potential to meet state regulations for conversion of agricultural land/use to residential use. The Coastal Act section 30242 expressly identifies that lands suitable for agricultural use shall not be converted to other uses unless continued agricultural use is not feasible or such conversion would preserve prime agricultural land or concentrate development within a developed area. Consistent with this Coastal Act policy, the City is closely scrutinizing potential rezones of agricultural lands within the City to avoid conversion of other agricultural land within the Carpinteria Valley and to concentrate residential development within its urban boundaries. However, the City Council firmly believes that the County and the Coastal Commission cannot make these findings for the Van Wingerden 1 and Bailard sites for the reasons stated above.

While the bar remains high for consideration of conversion of agricultural use and land, the City believes the “Van Wingerden 2” site may appropriately be considered given its location situated along a major transit route, its adjacency to existing urban development on two sides, and what appears to be adequate ingress/egress opportunity.

Lastly, we continue to urge the County to explore and identify additional potential sites for infill development opportunities throughout the unincorporated South County’s urbanized and suburban areas. More specifically, the County should be identifying and prioritizing underutilized commercial, office, residential, and governmental properties within these urban areas rather than relying so heavily on “greenfield” development opportunities on agricultural lands outside of the urban-rural boundary. In addition to having a better chance for being found consistent with Coastal Act resource protection policies, such infill opportunities that are closer to job centers could have a more meaningful impact on achieving a regional jobs-housing balance and reducing vehicle miles traveled, as encouraged by Draft County Housing Element Policy 1.3.

## **Request for Policies and Programs aimed at preventing displacement and promoting affordable housing**

We have a common interest in helping to ensure the availability of housing for workers in the agricultural, service and hospitality industries because these are important parts of the regional economy and wages are typically too low to keep pace with housing markets. Housing markets in attractive coastal areas, like Carpinteria, are heavily influenced by factors other than supply, such as demand for vacation rentals and second homes. These factors we expect will continue to contribute to escalating housing prices despite planned growth in supply.

As such, promoting growth and relying on development purported to be “affordable by design” will not be sufficient to meet the housing needs of the region. Government interventions will be required in order to provide housing that is available and that is affordable to many people that work in the City and in the Carpinteria Valley. We urge the County to join the City in developing measures to address this such as:

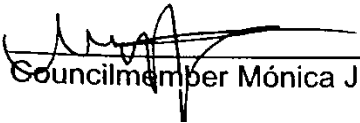
- Prioritize production of rental housing units over ownership units;
- Prioritize housing for agricultural and service workers;
- Adopt inclusionary requirements to achieve an amount of lower income rent restricted units significantly greater than provided for in state laws;
- Prohibit vacation rentals for multi-family residential housing built in the Carpinteria Valley, including prohibitions on corporate and limited liability company ownership models;
- Establish a vacancy tax and/or other measures to ensure second home use contributes to affordable housing development and preservation;
- Enact rent stabilization on multi-family rental housing; and
- Establish no-cause eviction prohibition regulations beyond state law requirements.

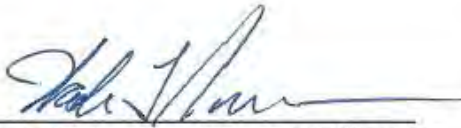
The City included each of the above measures in its Annual Work Plan and plans to incorporate these measures in our Housing Element to advance the City’s evidence to prevent displacement of existing residents and provide affordable housing for South County essential workers. The County should incorporate similar measures in its Housing Element policies and programs to ensure that the County and City move forward collaboratively to advance truly affordable housing policies within the Carpinteria Valley.

Lastly, we are seeking a commitment from the County to collaborate with the City to determine appropriate mitigation for development impacts, (e.g., traffic, parks, etc.) that will occur in the City as a result of these higher residential densities occurring outside the City limits, and to require these to be addressed as a part of project development approval. Such mitigation is critical to ensure that new and existing development have access to the public resources that make south Santa Barbara County a desirable place to live and work.

Thank you in advance for your consideration of this request.

Sincerely,

  
Councilmember Mónica J. Solórzano

  
Councilmember Wade T. Nomura

  
Councilmember Roy Lee

  
Vice Mayor Natalia Alarcon

  
Mayor Al Clark

Cc: [sbcob@countyofsb.org](mailto:sbcob@countyofsb.org)

# CITY of CARPINTERIA, CALIFORNIA



August 28, 2023

VIA EMAIL: [HOUSINGELEMENT@COUNTYOFSB.ORG](mailto:HOUSINGELEMENT@COUNTYOFSB.ORG)

Board of Supervisors  
County of Santa Barbara  
c/o Jessi Steele, Long Range Planning Division

Re: Santa Barbra County Draft 2023 – 2031 Housing Element Update

Dear Chair Williams and Honorable Members of the Board of Supervisors:

The City of Carpinteria (City) has been closely following the Santa Barbara County (County) Housing Element Update process. We appreciate the challenges faced by the County and other local jurisdictions, ourselves included, in crafting a Housing Element Update that satisfies our respective regional housing needs assessment (RHNA) allocations and meets the California Department of Housing and Community Development's (HCD) high bar for certification. We recognize the need for all areas of the County to share in meeting regional housing needs and that difficult decisions must be made concerning where and how to accommodate needed housing in a manner that affirmatively furthers fair housing.

The City Council submits this letter as a follow up to our February 28, 2023 letter (attached) wherein we requested modifications to the proposed housing sites in the Carpinteria Valley and a County commitment to implement policies and programs aimed at preventing displacement and promoting affordable housing. Since our last letter, we have been pleased to see the County move forward with the recent adoption of a just-cause residential eviction ordinance as an important step toward protecting tenants and helping to preserve the South County affordable rental housing stock.

We remain disheartened, however, to see that the County has not made changes to its inventory of potential rezone sites as requested by the City. Namely, the County still identifies the "Van Wingerden 1" potential rezone site and the "Bailard" pending housing project moving forward, despite the fact that these sites are inconsistent with the County's Comprehensive Plan Agricultural Element Policies, the County's Coastal Land Use Plan, and the California Coastal Act, which call for the preservation of coastal agricultural lands.

Wise planning practices call for higher residential densities to occur within or immediately adjacent to the urban core. County and City land use policies and the Coastal Act support these practices. Yet, the Van Wingerden 1 and Bailard sites contradict these fundamental principles by proposing the highest densities found in the Carpinteria Valley on agricultural lands at the very edge of the City, outside the urban-

rural boundary, at significant distance from the urban core, with no immediate access to pedestrian, bicycle and public transit routes, and not within reasonable walking distance to grocery shopping and other necessities and conveniences of daily living.

Again, we encourage the County to focus its Housing Element Update rezones on infill development sites located within existing urban and suburban areas throughout the South County. These infill development sites are more likely to be found consistent with California Coastal Act resource protection policies and will promote more desirable residential development near existing job centers and services.

Although the bar remains high to convert agricultural uses, the City believes that the "Van Wingerden 2" site may be an appropriate site to meet the goals of the Coastal Act and County Housing Element Policy 1.3. This site deserves continued consideration given its location along a major transit route, adjacent to existing urban development, and apparent adequate ingress/egress.

The City Council also wishes to address concerning comments regarding the proposed Bailard Avenue Multifamily Housing Project. At the February 2023 County Planning Commission Concept Review Hearing, comments were made indicating the developer intends to resubmit the project under an SB 330 Preliminary Application as a "Builder's Remedy" project pursuant to the Housing Accountability Act. Additional comments were made suggesting the inability of the County to deny or modify the project due to the invocation of the "Builder's Remedy" provisions.

The City asserts that these comments misstate the applicable law. Pursuant to Government Code section 65589.5, subdivision (e), nothing in the Housing Accountability Act, including the Builder's Remedy, relieves the County from complying with the California Coastal Act or the California Environmental Quality Act. Rather, the Housing Accountability Act, like other state housing laws, must be harmonized with the Coastal Act to the maximum extent feasible. The Bailard Avenue Multifamily Housing Project is located entirely within the coastal zone and thus subject to the County's certified Coastal Land Use Plan (CLUP) and Local Coastal Program (LCP). Therefore, the County must still apply any provisions of the County's CLUP and LCP to the Bailard Avenue Multifamily Housing Project. The City Council respectfully urges the County to acknowledge that it will process the Bailard Avenue Multifamily Housing Project consistent with its certified CLUP and LCP along with all applicable California Coastal Act policies and conduct a thorough environmental review under the California Environmental Quality Act.


The City Council requests that the County collaborate with the City as it moves forward with the rezoning of potential sites and consideration of proposed projects in the vicinity of the City. Collaboration with the City regarding appropriate mitigation measures for development impacts (e.g., traffic, parks, coastal resources, etc.) that will occur as a result of these high density residential projects is critical to ensure that new and existing development have access to the public resources that make the Carpinteria Valley a desirable place to live and work. These mitigation measures are necessary to ensure

that implementation of the County's Housing Element Update achieves the dual goals of affirmatively furthering fair housing and protecting coastal resources.

Thank you in advance for your consideration of this request.

Sincerely,

  
Councilmember Mónica J. Solórzano

  
Councilmember Wade T. Nomura

  
Councilmember Roy Lee

  
Vice Mayor Natalia Alarcon

  
Mayor Al Clark

Cc: County Clerk of the Board ([sbcob@countyofsb.org](mailto:sbcob@countyofsb.org))  
Alia Vosburg, County Development Review Division ([avosburg@countyofsb.org](mailto:avosburg@countyofsb.org))  
Barbara Carey, California Coastal Commission ([barbara.carey@coastal.ca.gov](mailto:barbara.carey@coastal.ca.gov))

# CITY of CARPINTERIA, CALIFORNIA



January 22, 2024

Board of Supervisors  
County of Santa Barbara

c/o Hannah Thomas, Long Range Planning Division via email: [housingelement@countyofsb.org](mailto:housingelement@countyofsb.org)

Re: Comments on the 2023-2031 Housing Element Update Draft Program Environmental Impact Report, 23EIR-00000-00004

Dear Chair Lavagnino and Honorable Members of the Board of Supervisors:

Thank you for the opportunity to comment on Santa Barbara County's ("County") Draft Program Environmental Impact Report for the 2023-2031 Housing Element Update ("DPEIR"). The City of Carpinteria ("City") has been closely following the County's Housing Element Update process. We appreciate the challenges faced by the County and other local jurisdictions, ourselves included, in updating and implementing our Housing Elements in a way that satisfies our respective regional housing needs assessment ("RHNA") allocations and meets the California Department of Housing and Community Development's ("HCD") standards.

We acknowledge that the DPEIR is an analysis and disclosure document related to potential environmental impacts rather than a policy or decision document. That said, we reiterate, and incorporate by reference here, our ongoing concerns that the rezoning of candidate sites in Carpinteria Valley would conflict with local and State law. As discussed in more detail in our letters dated February 28<sup>th</sup> and August 28<sup>th</sup> of 2023 (attached), given that these are productive agricultural sites located outside the urban-rural boundary and within the coastal zone, conversion to high density urban development would be inconsistent with Resource Protection policies of the California Coastal Act ("Coastal Act") as well as the specific goals, policies and regulations of the County and City's respective Local Coastal Programs ("LCPs"). In particular, "up-zoning" the sites identified as the "Van Wingerden 1" and the "Bailard" pending housing project site would contradict County LCP Policies, zoning regulations in Article II, and the Right to Farm Ordinance.

Conversely, due to its semi-urban setting, the "Van Wingerden 2" site would be more suitable for conversion to housing. However, a zoning change from AG-I to Design Residential may not be necessary to achieve planned housing goals at this site. As stated on pg. 4-9 of the DPEIR, the Van Wingerden sites "were included because the property owner may partner with a local non-profit housing organization to redevelop the sites for farmworker and/or lower-income housing." Under the County's Coastal Zoning Ordinance, a farmworker housing complex may be permitted in the AG-I zone with a Coastal Development Permit (CDP; Article II, Section 35-144P). Thus, we recommend that the County and/or property owner pursue the existing and available CDP option before initiating a potentially unwarranted spot zone.

With the above concerns in mind, the City offers the following comments on the DPEIR:

**A. Section 3.2. Agriculture**

In Section 3.2.3 the County provides information on the regulatory setting as it relates to potential agricultural impacts. Specifically, on page 3.2-21 there is an evaluation of the County's Coastal Land Use Plan ("CLUP") and whether any of the agricultural policies in the CLUP would apply to the project. The DPEIR states: "There are no CLUP policies specific to the Project area relevant to agriculture; however, Policies 8-1 through 8-12 are generally applicable to all agricultural uses within the unincorporated county (within the Coastal Zone)." This section goes on to say that Policy 8-4, regarding division of agricultural land, may particularly apply. We believe Policy 8-3, regarding the rezoning of agricultural land, also applies to the project and is directly applicable to the Van Wingerden rezone sites.

**B. Section 3.10. Land Use and Planning**

In Table 3.10-4, at the top of page 3.10-59, the DPEIR incorrectly states that all potential rezone sites are located outside the Coastal Zone and the jurisdiction of the CLUP. As noted above and elsewhere in the DPEIR, the two Van Wingerden rezone sites and the Bailard pending project site are well within the Coastal Zone and are subject to CLUP policies. As such, the conclusion for the CLUP section of Table 3.10-4 should be changed from "Potentially Consistent" to "Potentially Inconsistent." Please see the enclosed map, which shows the Van Wingerden and Bailard sites in relation to the Coastal Zone boundary.

**C. Chapter 4. Alternatives**

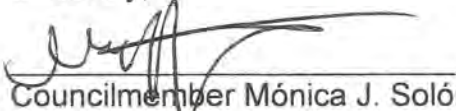
We applaud the County for selecting a wide range of alternatives for analysis (one no-project alternative and four build alternatives). However, we are disappointed that Alternative 2 is the only build alternative that contemplates the exclusion of the Van Wingerden rezone sites. As generally described in Chapter 4, the primary basis for Alternative 2 was to substantially reduce vehicle miles traveled ("VMT") – though it does not do so. As a result, Alternative 2 eliminates the two Van Wingerden sites, along with numerous non-coastal rezone sites that would otherwise have minimal environmental impacts; and it shifts higher density into the remaining candidate sites. Accordingly, Alternative 2 does not appear to be a desirable alternative since it would eliminate numerous candidate sites but not achieve the goal of substantially reducing total VMT or total VMT per service population in the North County.

As noted above and in our attached letters from 2023, the Bailard and Van Wingerden sites support productive agriculture in the Coastal Zone near or adjacent to other productive agricultural properties. Therefore, we believe another reduced project alternative should consider the elimination of these sites; and we request that one be added to the Final PEIR for consideration by decision makers. For example, an additional reduced alternative could consider the removal of all rezones in the Coastal Zone. As stated on pg. 4-9 of the DPEIR: "The California Coastal Act requires that the California Coastal Commission (CCC) approve (i.e., certify) rezones in the Coastal Zone. This requirement combined with regulatory barriers makes the construction of housing units on these agricultural parcels unlikely by 2031." A non-coastal alternative could consider the reduced impacts as well as the feasibility of implementing Program 1 (Adequate Sites for RHNA and Monitoring of No Net Loss) within the housing cycle

timeframe. It could further consider the fact that farmworker housing complexes could still be developed on agriculturally-zoned coastal sites with a CDP and without having to process zoning changes. Finally, such an alternative could be added to the document without triggering recirculation of the DPEIR since it would not be related to new significant impacts and would not provide substantial new information.

Our staff would be happy to meet and discuss our concerns and comments on the Housing Element Update and DPEIR with County staff. If you would like to set up such a meeting, please contact Nick Bobroff, Director of Community Development, at 805-755-4407 or at [nickb@carpinteriaca.gov](mailto:nickb@carpinteriaca.gov). We thank you for taking the time to consider and address our comments.

Sincerely,



Councilmember Mónica J. Solórzano



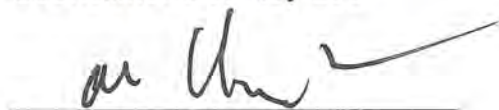
Councilmember Wade T. Nomura



Councilmember Roy Lee



Vice Mayor Natalia Alarcon

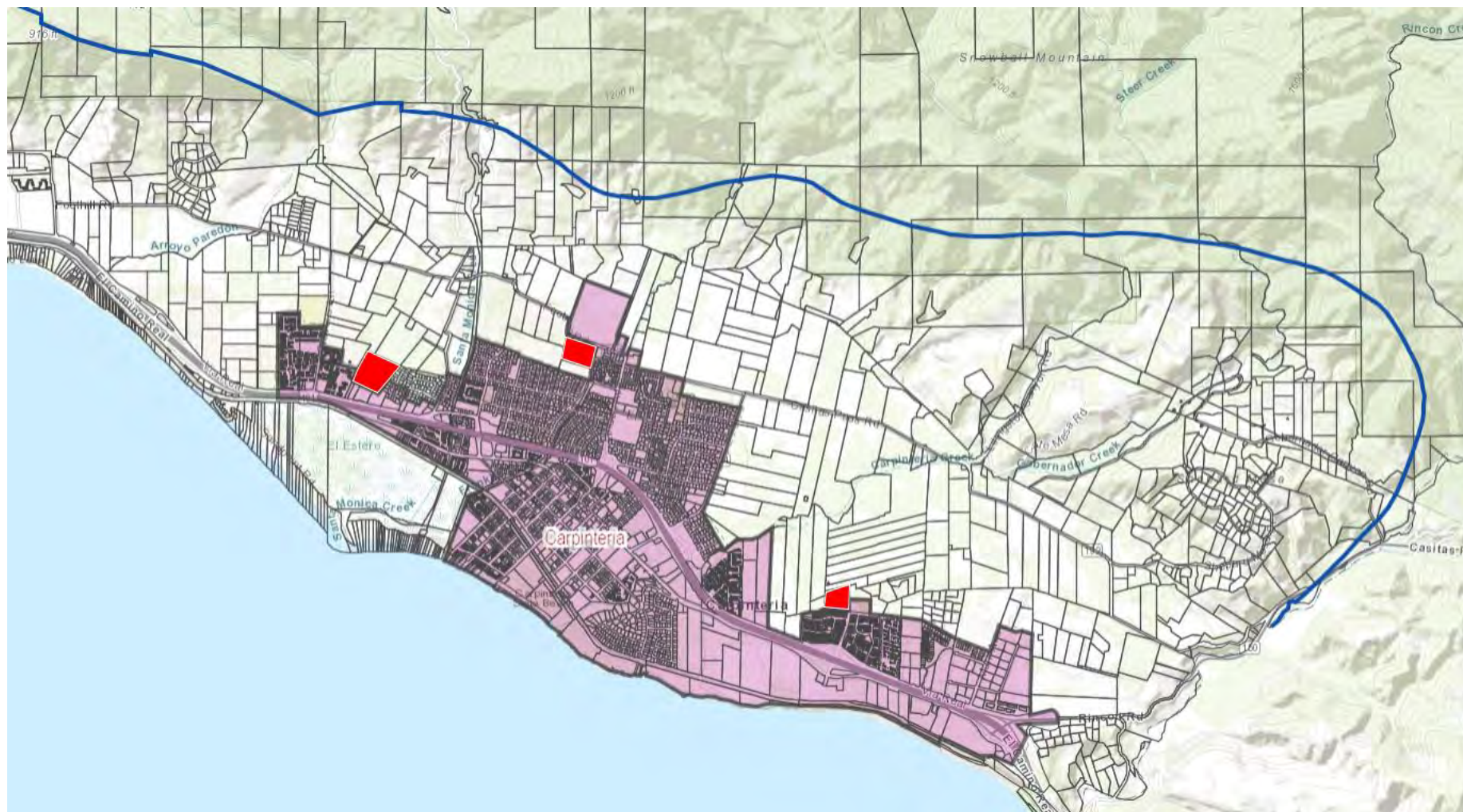


Mayor Al Clark

Enclosures:

City Letter to County on Draft Housing Element dated February 28, 2023  
City Letter to County on Draft Housing Element dated August 29, 2023  
Map of Coastal Zone Boundary in the Carpinteria Valley

Cc. County Clerk of the Board ([sbcob@countyofsb.org](mailto:sbcob@countyofsb.org))  
Lisa Plowman, Planning Director ([lplowman@countyofsb.org](mailto:lplowman@countyofsb.org))  
Alex Tuttle, Long Range Division Deputy Director ([atuttle@countyofsb.org](mailto:atuttle@countyofsb.org))  
Nick Bobroff, Community Development Director



Base map retrieved from Santa Barbara County Land Use and Zoning Map ArcGIS. Coastal Zone boundary in blue. Van Wingerden and Bailard sites shown in red.

# CITY of CARPINTERIA, CALIFORNIA



March 28, 2024

Chair Martinez and Honorable Commissioners  
County of Santa Barbara  
123 East Anapamu Street  
Santa Barbara, CA 93101

Via email to Hearing Support: [dvillalo@countyofsb.org](mailto:dvillalo@countyofsb.org)

Re: Comments on the Proposed Rezones and the 2023-2031 Housing Element Update  
Program Environmental Impact Report, 23EIR-00004

Dear Chair Martinez and Honorable Members of the Planning Commission:

The City of Carpinteria ("City") has been closely following the County's Housing Element Update process. We appreciate the challenges faced by the County and other local jurisdictions, ourselves included, in updating and implementing our Housing Elements in a way that satisfies our respective regional housing needs assessment ("RHNA") allocations and meets the California Department of Housing and Community Development's ("HCD") standards.

However, we continue to object to the rezoning of candidate sites in Carpinteria Valley that we believe would be in direct conflict with local and State law. As discussed in more detail in our previous letters dated February 28<sup>th</sup> and August 28<sup>th</sup> of 2023 (attached), given that these are productive agricultural sites located outside the urban-rural boundary and within the California Coastal Zone ("Coastal Zone"), conversion to high density urban development would be grossly inconsistent with Resource Protection policies of the California Coastal Act ("Coastal Act") as well as the specific goals, policies and regulations of the County and City's respective Local Coastal Programs ("LCPs"). Since conversion of these sites into residential development would also require annexation into the Carpinteria Sanitary District, it appears the rezoning of these sites would also be in conflict with several policies set by the Local Agency Formation Commission (LAFCO) to discourage conversion of prime agricultural lands. Moreover, inclusion of these rezone sites would result in numerous Class I (i.e., significant and unavoidable) environmental impacts, the severity of which can easily be substantially reduced or avoided entirely by simply selecting a project alternative that excludes these sites from further consideration. Due to these policy inconsistencies and readily available less impactful alternatives, the Planning Commission cannot make the required findings in Staff Report Attachment A for the Carpinteria-adjacent rezone sites.

*Agricultural Site Rezones: Van Wingerden 1 and 2*

The Planning Commission Staff Report for the County's Housing Element rezone sites and Program Environmental Impact Report ("PEIR") notes that to rezone the Van Wingerden 1 and 2 sites to high-density residential and remain in compliance with the County Land Use and Development Code and Coastal Zoning Ordinance, the Urban/Rural Boundary ("Boundary") would need to be moved such that these two sites are added to the Urban Area. While this strategy may appease some County policies, it defeats the Urban/Rural Boundary's entire purpose of containing urban development. Moving the Boundary ignores the land resources policies of the Coastal Act that are expressly intended to establish and preserve "stable boundaries separating urban and rural areas" (Pub. Resources Code Sec. 30241(a)). Given that there are numerous other rezone site options in the South County already within the Urban/Rural Boundary, the County must consider and utilize all non-agricultural sites and sites within existing developed and urban areas prior to rezoning any agricultural land for other development (Pub. Resources Code Secs. 30241(d); and 30250(a)).

Additionally, rezoning the Van Wingerden 1 and 2 sites contradicts agricultural protection policies in the County's Comprehensive Plan. One of the fundamental goals of the Land Use Element is to preserve both prime and non-prime soils for agricultural use (noted in PEIR Page 3.10-14). The Agricultural Element outlines several policies that require protection of agricultural land, including Policy I.F, which includes maintaining a stable Urban/Rural Boundary to protect agricultural soils. Eliminating agricultural sites for housing also conflicts with Policy III.A, that states: "expansion of urban development into active agricultural areas outside of urban limits is to be discouraged, as long as infill development is available." The County's own "Balancing Act" interactive website prepared for the Housing Element demonstrates that such sufficient sites located within existing urban areas of the unincorporated South Coast are available to meet the County's RHNA. The County's Coastal Land Use Plan (Policy 8-3) and Coastal Zoning Ordinance (Section 35-64) also contain specific criteria for conversion of agricultural lands to a non-agricultural zone district, which neither of the Van Wingerden sites meet. Nor has the County provided the necessary determination of agricultural viability and economic feasibility required by the Coastal Act (Pub. Resources Code Sec. 30241.5) to support such conversion of agricultural lands. Thus, moving the Urban/Rural Boundary to accommodate high-density residential use on agriculturally-zoned land when the County maintains other possible rezone sites is not consistent with the County's local land use regulations or the California Coastal Act.

The City does, however, acknowledge that the "Van Wingerden 2" site could *potentially* be a suitable site for conversion to housing for agricultural employees and/or farmworkers. However, a zoning change from AG-I to Design Residential would not be necessary to accommodate such a project at this site. As stated on pg. 4-9 of the PEIR, the Van Wingerden sites "were included because the property owner may partner with a local non-profit housing organization to redevelop the sites for farmworker and/or lower-income housing." Under the County's Coastal Zoning Ordinance, a farmworker housing complex may be permitted in the AG-I zone with a Coastal Development Permit (CDP; Article II, Section 35-144P). Such an approach would avoid the above-summarized policy inconsistency issues resulting from the contemplated rezone, and more importantly, would

provide critically-needed housing expressly dedicated to agricultural employees and farmworkers. Thus, we recommend that the County and/or property owner pursue the existing and available CDP option before initiating an unwarranted spot zone.

### Upzoning the Bailard Site

The Bailard site (as well as the Van Wingerden sites discussed above) sits on the City-County boundary and, as noted in the City's General Plan/Coastal Land Use Plan ("GP/CLUP"), is within the City's planning area. Our Land Use Element "strongly favors a firm urban/rural boundary between the incorporated area... and the rural areas of Carpinteria Valley" (Carpinteria GP/CLUP Page 17). The City strives to maintain a low-density buffer between the City's denser urban neighborhoods and the rural agricultural land in the unincorporated Valley— this is core to our identity as a small beach town (GP/CLUP Objective LU-3) and to discourage the gradual encroachment of urban development into the surrounding agricultural areas of the Valley. The Bailard site's current 3-E-1 zoning optimally meets this purpose, and aligns with Land Use policies for the City's planning area. Allowing the densest residential zoning in the Carpinteria Valley to be placed on this Urban/Rural Boundary site contradicts both the Land Use policies and character that City and County residents deeply value. Many of the same policy inconsistency issues raised above for the Van Wingerden 1 and 2 sites relative to defeating the purpose of a stable Urban/Rural Boundary apply equally to this site. The City is also concerned that future residents of the Bailard and Van Wingerden sites would place a substantial and unmitigated burden on the City's infrastructure and services, while solely benefitting the County's RHNA allocation.

In addition, the Commission should not recommend a rezone of the Bailard site because, as stated on page 14 of the Planning Commission Staff Report, an adjacent 2.5-acre parcel would also need to be moved into the Urban Area to maintain County CLUP consistency for a Bailard site rezone. As this parcel could not be rezoned with the Housing Element sites, it would create a single parcel with 3-E-1 zoning isolated from other rural residential-zoned sites. This contrived zoning scenario does not reflect good planning practice.

### Project Alternatives Considerations

As noted above and in our attached letters from 2023, the Bailard and Van Wingerden 1 and 2 rezone sites support productive agriculture in the Coastal Zone near or adjacent to other productive agricultural properties. Therefore, we believe your Commission should not recommend these sites for rezoning. As stated on pg. 4-9 of the PEIR: "The California Coastal Act requires that the California Coastal Commission (CCC) approve (i.e., certify) rezones in the Coastal Zone. This requirement combined with regulatory barriers makes the construction of housing units on these agricultural parcels unlikely by 2031." We request that your Commission consider only non-coastal sites at this time for the implementation of Program 1 (Adequate Sites for RHNA and Monitoring of No Net Loss) within the housing cycle timeframe. A non-coastal alternative could easily be considered

and adopted without further change to the PEIR. Such an alternative would be feasible based on the County's "Balancing Act" tool and project objectives. Moreover, it would greatly reduce significant environmental impacts as compared to the proposed project in the PEIR, thereby reducing the County's mitigation requirements and resolving the numerous policy inconsistencies noted above.

However, should you wish to select only from those alternatives already described in the PEIR for the sake of expediency, we would urge you to recommend the "Sustainable Communities" project alternative that eliminated the Van Wingerden Sites.

### Planning Commission Findings

Due to the above-described inconsistencies with the Coastal Act, County CLUP, Carpinteria Planning Area policies, and LAFCO policies, as well as the extensive Class I impacts identified in the PEIR for the proposed project, the City concludes that several of the required findings for approval provided in Attachment A to the Planning Commission Staff Report cannot be made to approve the proposed amendments to the County's Comprehensive Plan, Development Code, and Zoning Map. Findings 4.1.2 and 4.2.2 speak to consistency with the Comprehensive Plan, the CLUP, the requirements of State planning and zoning laws, and other County Codes. As demonstrated above, rezoning the Bailard and two Van Wingerden sites is in direct conflict with multiple Coastal Act and Comprehensive Plan policies related to the protection of agricultural land and the Urban-Rural Boundary. Findings 4.1.3 and 4.2.3 state "the [rezones are] consistent with good zoning and planning practices." Expanding the Urban-Rural Boundary specifically to permit three high-density residential sites at this Boundary negates the aim of such a delineation, breaks up the rural and agricultural land uses within the Carpinteria Valley, akin to several isolated spot zones. To ensure these findings can be properly made, the City urges the County to remove Van Wingerden Sites 1 and 2 and the Bailard site from the rezone list.

Our staff would be happy to meet and discuss our concerns and comments on the Housing Element Update and PEIR with County staff. If you would like to set up such a meeting, please contact Mindy Fogg, Principal Planner, at 805-755-4408 or at [mindyf@carpinteriaca.gov](mailto:mindyf@carpinteriaca.gov). We thank you for taking the time to consider and address our comments.

Sincerely,

  
\_\_\_\_\_  
Nick Bobroff, Director

Community Development Department

Enclosures:

City Letter to County on Draft Housing Element dated February 28, 2023  
City Letter to County on Draft Housing Element dated August 29, 2023

Cc. Lisa Plowman, Planning Director ([lplowman@countyofsb.org](mailto:lplowman@countyofsb.org))  
Alex Tuttle, Long Range Division Deputy Director ([atuttle@countyofsb.org](mailto:atuttle@countyofsb.org))  
County Long Range Planning Division ([housingelement@countyofsb.org](mailto:housingelement@countyofsb.org))

# CITY of CARPINTERIA, CALIFORNIA



May 2, 2024

Chair Lavagnino and Honorable Supervisors  
County of Santa Barbara  
123 East Anapamu Street  
Santa Barbara, CA 93101

Via email to the Clerk of the Board: [sbcob@countyofsb.org](mailto:sbcob@countyofsb.org)

Re: Comments on the 2023-2031 Housing Element Update Rezone Amendments

Dear Chair Lavagnino and Honorable Supervisors:

Thank you for the opportunity to comment on Santa Barbara County's ("County") proposed Housing Element Rezone Amendments. As you know, the City of Carpinteria ("City") has been closely following and participating in the County's Housing Element Update process (see previous letters attached). We recognize and understand the challenges you face in having to update and implement your Housing Element in a way that satisfies the current regional housing needs assessment ("RHNA") allocations and meets the new California Department of Housing and Community Development's ("HCD") standards. We are grappling with many of the same difficulties. But unlike the County's jurisdiction, our city is located entirely within the California Coastal Zone ("Coastal Zone"). Accordingly, we are providing for high-density affordable coastal housing within the Urban/Rural Boundary in order to meet RHNA allocations and affirmatively further fair housing along the South Coast. You have the option to avoid the Coastal Zone entirely and, more importantly, to avoid redesignation of coastal Rural Area to coastal Urban Area -- an effort that would undoubtedly be costly and time consuming for County staff with no certainty of final certification by the California Coastal Commission.

In particular, and as described in detail in our enclosed letters, we continue to not support the potential "up-zoning" of three coastal candidate sites in Carpinteria Valley known as the Bailard pending project, Van Wingerden 1, and Van Wingerden 2.

The County Planning Commission, with astute observations from Commissioner Cooney, saw the importance of removing the Bailard pending project from the recommended list of zoning and Comprehensive Plan amendments. We strongly support that recommendation. While we recognize that Bailard is a pending "Builder's Remedy" project, it is still far from approvable under the California Coastal Act ("Coastal Act"). Pursuant to Government Code section 65589.5, subdivision (e), nothing in the Housing Accountability Act, including the Builder's Remedy, relieves the County (or the developer) from complying with the Coastal Act. Until the Bailard application is revised to better harmonize the proposed urban development with Coastal Act policies, the County need not allocate public funds to

facilitate a rezone and Comprehensive Plan / Local Coastal Program (“LCP”) Amendment in support of the project.

Similarly, we believe that the zoning and LCP amendments needed for the Van Wingerden sites are not approvable under the Coastal Act. Provided here is a brief summary of the points we’ve made in previous letters with regard to the Bailard and Van Wingerden sites:

- The project sites support productive agriculture adjacent to other productive *coastal* agricultural lands.
  - Numerous County and City LCP Policies require Agricultural Buffers and protection of agricultural lands/operations from urban development.
  - The Coastal Act requires that the County consider and utilize all non-agricultural sites and sites within existing developed and urban areas prior to rezoning any agricultural land for other development (Pub. Resources Code Secs. 30241(d); and 30250(a)).
- The sites are located outside the Urban/Rural Boundary (“Boundary”) within the coastal zone.
  - Any rezones would require relocation of the Boundary, which defeats the Boundary’s entire purpose of containing urban development.
  - The County’s Agricultural Element has policies that require maintaining a stable Boundary, protecting agricultural lands, and minimizing expansion of urban development into active agricultural areas when other options are available. (Most of the policies are conspicuously absent from Attachment 17 of the Board Letter).
  - The Coastal Act requires minimization of conflicts between coastal agriculture and urban uses by “establishing stable boundaries separating urban and rural areas” (Pub. Resources Code Sec. 30241(a)).
  - County and City land use and resource protection plans have long been based on having a firm Boundary between the incorporated area and the rural areas of Carpinteria Valley.
- Development of these sites would require annexation to services, which would trigger policies set by the Local Agency Formation Commission (LAFCO) that discourage conversion of agricultural lands.
- Conversion of the sites from agricultural to urban use would result in unnecessary significant and unmitigable environmental impacts as disclosed in the Final Environmental Impact Report (EIR) prepared for the rezones.
- Findings for approval provided in Attachment 1 to the Board Letter cannot reasonably be made. In particular:

- Finding 4.2.2 regarding consistency with the Comprehensive Plan, the LCP, the requirements of State planning and zoning laws, and other County Codes is unsubstantiated.
- Finding 4.2.3 asserts that these coastal rezones "...foster infill development, and site new residential development near existing services, utilities, and public transit." This statement is at variance with the actual setting for these sites.
- The County could achieve RHNA credit on one or more of these coastal sites without any rezone or Comprehensive Plan / LCP Amendment if it facilitated an agreement with the landowner(s) to develop Farmworker Housing (i.e., truly affordable and greatly needed workforce housing near jobs) as allowed with a simple Coastal Development Permit under the existing County regulations (Article II, Section 35-144P).

Based on the facts listed above and the details we've provided in our previous letters, we believe it would be very difficult to attain Coastal Commission certification for the three Carpinteria Valley rezone sites. As stated in staff's Board Letter, "If the Coastal Commission denies certification, State housing element law (i.e., No Net Loss Law) may require that the County identify and rezone additional sites within six months to fully accommodate its RHNA plus the 15 percent buffer." Not only would the rezoning of additional south county sites likely require another lengthy public process and supplemental EIR, it would require allocating more staff time and resources that could be better spent on other public services.

Therefore, we respectfully request that the Bailard pending project site remain off of the selected rezone list and that the two Van Wingerden sites be removed from your selection. If you have any questions, please contact Mindy Fogg, Principal Planner, at 805-755-4408 or at [mindyf@carpinteriaca.gov](mailto:mindyf@carpinteriaca.gov). We thank you for taking the time to consider our comments.

Sincerely,



Nick Bobroff, Director  
Community Development Department

Enclosures:

1. City Letter to County Planning Commission dated March 28, 2024
2. City Letter to County on Draft Housing Element dated August 29, 2023
3. City Letter to County on Draft Housing Element dated February 28, 2023

Cc. Lisa Plowman, Planning Director ([lplowman@countyofsb.org](mailto:lplowman@countyofsb.org))  
Alex Tuttle, Long Range Division Deputy Director ([atuttle@countyofsb.org](mailto:atuttle@countyofsb.org))  
County Long Range Planning Division ([housingelement@countyofsb.org](mailto:housingelement@countyofsb.org))

# CITY of CARPINTERIA, CALIFORNIA



September 16, 2024

Alia Vosburg  
Development Review Division  
Planning & Development Department  
County of Santa Barbara  
624 W. Foster Rd., Suite C  
Santa Maria, CA 93455

Via email to: [avosburg@countyofsb.org](mailto:avosburg@countyofsb.org)

Re: Bailard Multifamily Housing Project\_21DVP-00029, 21CDP-00126, & 21LLA-00004

Dear Ms. Vosburg:

Thank you for your email dated August 30, 2024, informing of us of the County of Santa Barbara's ("County") completeness determination for the Bailard Multifamily Housing Project application and the upcoming deadline of September 17, 2024 to identify any inconsistencies with applicable plans, programs, policies, ordinances, standards, requirements, or other similar provisions (collectively "policies"). As you noted in your email, the proposed project includes improvements in the City of Carpinteria ("City") right-of-way, including improvement of the Bailard and Pandanus intersection with a proposed roundabout design. Our review of the provided project materials also indicates the project includes improvements to real property located within the jurisdictional boundaries of the City of Carpinteria, which would require review and permitting by the City.

In response to your email notice, we provide the following comments that identify potential inconsistencies with policies:

**1. Studies Necessary for Review** – Numerous City policies related to safety, flooding, drainage, and stormwater are not met due to lack of information. The following studies are necessary for City staff to review and determine compliance/consistency:

- Hydraulics and hydrology study or analysis
- Soils engineering report and engineering geology report, respectively
- Capacity analysis of the City's stormwater system to accommodate runoff generated by the project improvements
- Stormwater control plan and stormwater pollution prevention plan, respectively

The above-listed technical studies are necessary for at least preliminary review of technical feasibility and/or technical correctness.

**2. Infrastructure Improvements** – The basis of design must meet City, local, state, federal, and/or industry standards, policies, and/or best practices for the proposed backbone infrastructure improvements (i.e. grading, stormwater quality and drainage, street and

roadway, potable water, and wastewater/sanitary sewer) within the City's public right-of-way and/or real property located within the City. For example, the following standards, policies, and/or best practices of latest editions, which are not exhaustive herein, are accepted by the City and should be the basis of design for infrastructure improvements. Until the project documents/analyses demonstrate compliance, the project is considered to be inconsistent with the following:

### **Grading**

- City of Carpinteria. "Safety Element." Carpinteria General Plan and Coastal Land Use Plan (GP/CLUP)
- City of Carpinteria. "Excavation and Grading." Carpinteria Municipal Code
- City of Carpinteria. Standard Plans for Public Works Construction
- City of Carpinteria. Standard Specifications for Public Works Construction
- State of California. Highway Design Manual

### **Stormwater Quality and Drainage**

- County of Santa Barbara. Stormwater Technical Guide for Low Impact Development
- State of California. Highway Design Manual
- State of California. State Water Resources Control Board. National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities
- United States. Department of Transportation. Federal Highway Administration. Urban Drainage Design Manual

### **Street and Roadway**

- American Association of State Highway and Transportation Officials. A Policy on Geometric Design of Highways and Streets
- City of Carpinteria. "Circulation Element." (GP/CLUP)
- City of Carpinteria. "Street Construction and Excavation." Carpinteria Municipal Code
- City of Carpinteria. Standard Plans for Public Works Construction
- City of Carpinteria. Standard Specifications for Public Works Construction
- State of California. Highway Design Manual
- State of California. Manual on Uniform Traffic Control Devices
- United States. Department of Justice. ADA Standards for Accessible Design

### **Potable Water**

- Carpinteria Valley Water District. Standard Plans
- City of Carpinteria. Standard Plans for Public Works Construction
- City of Carpinteria. Standard Specifications for Public Works Construction

### **Wastewater/Sanitary Sewer**

- Carpinteria Sanitary District. Construction Standards and Specifications for Building Sewer and Lateral Sewer Improvements

- City of Carpinteria. Standard Plans for Public Works Construction
- City of Carpinteria. Standard Specifications for Public Works Construction

At this time, the project submittal does not provide sufficient information as to whether the project meets City, local, state, federal, and/or industry standards, policies, and/or best practices for the proposed backbone infrastructure improvements.

**3. Traffic Assessment** – The City’s Public Works Department retained the consulting peer review services of TKM Engineering for review of the Focused Traffic Assessment (by Linscott Law & Greenspan dated February 24, 2023) and Memorandum of Bailard Multifamily Development Project Design Exception (by Linscott Law & Greenspan dated February 22, 2024), respectively. Review comments are noted in the attached said documents. Issues identified in the attachment are summarized here:

- The study needs to account for the proposed roundabout (showing updated figures) and all ingress/egress for the project.
- It should include analysis of Bailard Ave intersections with Caltrans on- and off-ramps using both City and State thresholds for Level of Service (LOS) and safety.
- It should account for LOS at the Bailard/Via Real Intersection.
- A vehicle-miles-traveled (VMT) analysis should be included.
- It should account for moving vans and trucks that would be used by residents.

**4. Proposed Roundabout and Road Improvements** – A conceptual outline of the roundabout is shown on multiple plan sheets. However, detailed preliminary civil engineering plan as well as a geometric layout and profile are needed for City staff’s review. Plans must clearly depict existing and proposed improvements, property lines, major vegetation, easements, utilities, and any other pertinent features/infrastructure. If any trees on City property would be impacted, an arborist report and tree mitigation/replacement plan would also be needed. Based on the conceptual plans in the application, City staff identified the following issues:

- Based on the ALTA/NSPS Land Title Survey Plan and Tentative Lot Line Adjustment Plan, respectively, the roundabout appears to be proposed within not only the City’s public right-of-way of Bailard Avenue but also within City parcel, APN 001-080-038, as well as existing easements. An Engineering Permit within the City’s public right- of-way of Bailard Avenue would be needed for the construction of the roundabout as an offsite improvement. Further, a few land acquisition transactions would be needed for the roundabout to be permanently situated within the City’s public right- of-way. For example, land dedications from the City parcel (i.e. APN 001-080-038) and private property of the developer (i.e. APN 001-080-045), respectively, would be needed for the roundabout. Finally, those existing easements that are for public use such as utilities, road, and access (e.g. ingress and egress) would need to be retained.
- As part of the encroachment into APN 001-080-038, it appears the project may result in alteration of the public parking lot serving Monte Vista Park, possibly

resulting in the loss of Park parking spaces. This change to the Park development would require the filing and processing of a Development Permit Revision (DPR) and Coastal Development Permit (CDP) with the City. Any loss of public parking would need to be mitigated/resolved as part of that permitting process.

- To the extent that the project calls for proposed improvements to real property owned by the Casitas Village Home Owners Association to accommodate the project's required emergency access out onto Pandanus Lane, the developer would also need to obtain a DPR/CDP from the City for the changes/alterations to the approved plans for Casitas Village.
- In addition to the required permits, it appears the developer would need to obtain an easement from the City to accommodate the proposed realignment of a private drive access on the Bailard property from the Bailard/Pandanus intersection to instead terminate on the City's Monte Vista Park property.

**5. Impacts to Monte Vista Park** – As noted in comment #4 above, the proposed project may directly and indirectly impact Monte Vista Park. Additional detailed information is needed to determine the extent and feasibility of the changes. Until detailed plans and analyses are provided, the project is assumed to be inconsistent with the following City GP/CLUP objectives and policies:

- **Open Space, Recreation & Conservation Element Objective OSC-14.** Provide for adequate park and recreation facilities to meet the needs of the community and visitors.
  - **Policy OSC-14f.** No unrelated development shall be permitted in publicly owned recreational areas except pipelines to serve coastal dependent industrial uses when no alternative route is feasible.
  - **OSC-14-Implementation Policy 62:** Continue to update and collect parkland in-lieu, Quimby, and development impact fees to assist the City in acquisition of new parkland to maintain the desired level of service. The minimum level of service shall be 3 acres per 1000 population. Park impact fees shall apply to both commercial/industrial and residential development.
- **Public Facilities & Services Element Objective PF-5:** To provide a high quality and broad range of public services, facilities and utilities to meet the needs of all present and future residents of the Carpinteria Planning Area.
  - **Policy PF-5b.** The City will require proposed new developments to pay a fair share of the cost of needed public facilities and services. Further, in areas of the city designated for non-residential use but where residential use may be permitted, the City shall monitor total residential development and report annually to the School, Fire, Water and Sanitary districts to permit proper facilities planning by these special districts.
  - **Policy PF-5c.** The City will ensure that new development will not adversely impact services and facilities provided to existing development.

- **Public Facilities & Services Element Objective PF-6:** To ensure that new development is adequately served by utilities and does not impact existing service areas in the community.
  - **Policy PF-6b.** Development projects shall not result in a quantifiable reduction in the level of public services provided to existing development, nor shall new development increase the cost of public services provided to existing development.

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In addition to the above comments related to development within the City, City staff has previously documented the project's potential inconsistencies with the City's certified Coastal Land Use Plan (CLUP) and General Plan (GP) policies. While we recognize that the project would be located within the County's jurisdiction, we reiterate the following inconsistencies with City planning policies:

**A. Density and Location** – The proposed project would have the highest density in the Carpinteria Planning Area (city and unincorporated area combined). The proposed high-density urban development should not be sited in the rural areas along the City's edges. To do so directly conflicts with the following Land Use Element Policies in the City's GP/CLUP:

- **Policy LU-3a:** New development shall occur contiguous to existing developed areas of the city. Higher density in certain residential neighborhoods and for residential uses in commercial districts shall be provided as a means to concentrate development in the urban core consistent with zoning designations, particularly where redevelopment of existing structures is proposed.
- **Policy LU-4a:** Establish a greenbelt of open space including undeveloped land and open-field agricultural land surrounding the City.

**B. Agricultural Resources** – The proposed project would directly remove agricultural resources on site and would indirectly adversely affect agricultural lands adjacent to the project site. As such, the project is inconsistent with the following policies in the City's GP/CLUP:

- **Policy LU-3n:** Setbacks shall be created between agricultural and urban uses. The responsibility of providing the buffer shall rest with the property intensifying its use. The buffer shall be adequate to prevent impacts to adjacent agricultural production. Such impacts include increased limitations on the use of chemicals and fertilizers and increased conflicts between the urban use and the adjacent agricultural operation.
- **Objective LU-4:** Influence land use decision-making, use and development patterns in the unincorporated Carpinteria Valley to be supportive of the California Coastal Act and City objectives to preserve unique coastal resources by

establishing open-field agricultural use as the predominant use in the unincorporated Valley.

- **Policy OSC-9e:** Avoid the conversion of agricultural land to nonagricultural land uses except where conversion meets the criteria established by Sections 30241, 30241.5, and 30242 of the Coastal Act.
- **Policy PF-5g.** The City will coordinate with the appropriate agencies/districts and plan for public facilities to be located and sized to discourage expansion of urban development beyond the transition area of the urban/rural boundary. New or expanded public works facilities shall be designed and limited to accommodate needs generated by development or uses allowed consistent with the provisions of the City's Local Coastal Program.

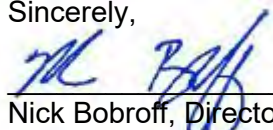
**C. Community Character / Design** – The proposed project would have seven multifamily, three-story apartment buildings with heights of over 42 feet and some structural elements exceeding 46 feet. These would be the tallest buildings in the Carpinteria Planning Area. The height, bulk and scale of the project would be inconsistent with the following objectives, policies and regulations:

- **Carpinteria Municipal Code, Title 14 – Zoning**, all residential and commercial zoning districts provide that “No building or structure shall exceed a height of thirty (30) feet.”
- **Land Use Element Objective LU-1:** Establish the basis for orderly, well planned urban development while protecting coastal resources and providing for greater access and recreational opportunities for the public.
  - **Policy LU-1a.** The policies of the Coastal Act (Public Resources Code Section 30210 through 30263) are hereby incorporated by reference (and shall be effective as if included in full herein) as the guiding policies of the land use plan.
  - **Policy LU-1d.** Ensure that the type, location and intensity of land uses planned adjacent to any parcel designated open space/recreation or agriculture are compatible with these public resources and will not be detrimental to the resource.
- **Land Use Element Objective LU-3:** Preserve the small beach town character of the built environment of Carpinteria, encouraging compatible revitalization and avoiding sprawl development at the city's edge.
  - **Policy LU-3l.** Land use designations established on the City's land use map that permit a range of residential densities should not be interpreted to permit development that is incompatible with the existing development pattern in an area. A density within the allowable range that is most compatible with the predominant pattern of development in the area should be used as the guide for determining the appropriateness of the proposed development.

- **Policy LU-3n.** Setbacks shall be created between agricultural and urban uses. The responsibility of providing the buffer shall rest with the property intensifying its use. The buffer shall be adequate to prevent impacts to adjacent agricultural production. Such impacts include increased limitations on the use of chemicals and fertilizers and increased conflicts between the urban use and the adjacent agricultural operation.
- **Community Design Element Objective CD-1:** The size, scale and form of buildings, and their placement on a parcel should be compatible with adjacent and nearby properties, and with the dominant neighborhood or district development pattern.
  - **Policy CD-10d.** Frontages in city-edge neighborhoods should reflect the rural or semi-rural character of those places by the use of narrow roads detailed in a rural manner. Rural detailing could include unpaved verges, and yards bounded by low fences or native stone walls, and irregular rows of trees historically found in the rural California landscape.
- **Community Design Element Objective CDS4-3:** Enhance existing residential neighborhoods and ensure that new development improves the neighborhood scale and character.
  - **Policy CDS4-a.** Ensure that new development is sensitive to the scale and character of the existing neighborhoods, and consistent with the city's "small beach town" image.
  - **Policy CDS4-b.** Ensure that new development adjacent to designated city edges, abutting agricultural lands outside the city limits, are designed with rural and semi-rural elements and details, providing an appropriate transition and connection of the town to the countryside.

If you have any questions, please contact Mindy Fogg, Principal Planner, at 805-755-4408 or at [mindyf@carpinteriaca.gov](mailto:mindyf@carpinteriaca.gov). We thank you for taking the time to consider our comments.

Sincerely,



Nick Bobroff, Director  
Community Development Department

Enclosure:

- With TKM Comments: Focused Traffic Assessment by Linscott Law & Greenspan dated February 24, 2023 and Memorandum of Bailard Multifamily Development Project Design Exception by Linscott Law & Greenspan dated February 22, 2024



## Planning and Development

Lisa Plowman, Director

Jeff Wilson, Assistant Director

Elise Dale, Assistant Director

September 17, 2024

Tony Tomasello

10 East Figueroa Street, Suite 200

Santa Barbara, CA 93101

Sent via email to [actomasello@rrmdesign.com](mailto:actomasello@rrmdesign.com)

**RE: Determination of Inconsistency**

**Bailard Avenue Multifamily Housing Project**

**Case Nos. 21LLA-00000-00004, 21DVP-00000-00029, 21CDP-00000-00126, and 21BAR-00000-00227**

**1101 and 1103 Bailard Avenue; APN 001-080-045 and 001-080-046**

Dear Mr. Tomasello:

The proposed project is a request for approval of a multifamily housing development project under the provisions of the Housing Accountability Act (Government Code Section 65589.5). The Housing Accountability Act establishes limitations to a local government's ability to deny, reduce the density of, or make infeasible housing development projects that are consistent with objective development standards and contribute to meeting housing need. However, in accordance with Government Code Section 65589.5.e, local governments taking action on housing development projects must still comply with the California Coastal Act.

In accordance with Government Code Section 65589.5(j)(2), if the local agency considers a proposed housing development project to be inconsistent, not in compliance, or not in conformity with an applicable plan, program, policy, ordinance, standard, requirement, or other similar provision it shall provide the applicant with written documentation identifying the provision or provisions, and an explanation of the reason or reasons it considers the housing development to be inconsistent, not in compliance, or not in conformity. The Planning and Development Department (P&D) reviewed your application and found it to be inconsistent with the policies and requirements discussed below. Please revise and/or supplement the project application to respond to the identified inconsistencies, and clearly identify any State Density Bonus Law incentives/concessions or waivers that are requested for relief from a specific policy/development standard.

### **E-1 Zone Standards**

**Article II Section 35-71.6.** *Each main dwelling unit and its permitted accessory buildings and structures shall be located upon a lot having a minimum lot width and a minimum lot area, as indicated below for the symbol shown on the lot on the applicable Santa Barbara County Zoning Map.*

| <i>Zoning Symbol</i> | <i>Minimum Lot Size</i> | <i>Minimum Net Lot Width (ft.)</i> |
|----------------------|-------------------------|------------------------------------|
| 3-E-1                | 3 acres (gross)         | 210                                |

**Article II Section 35-134.B.2.a.** *No lot involved in the Lot Line Adjustment whose area is equal to or greater than the minimum lot area requirement of the applicable zone shall become smaller than the minimum lot area requirement of the applicable zone as a result of the Lot Line Adjustment.*

**Reason for Inconsistency:** The proposed project includes a lot line adjustment between two existing lots that currently exceed the minimum lot area requirement of the zone. As a result of the proposed lot line adjustment, one of the lots will become smaller than the minimum lot area requirement of the zone.

**Article II Section 35-71.10.** *Height Limit. No building or structure shall exceed a height of 25 feet.*

**Reason for Inconsistency:** The proposed project includes seven apartment buildings, which each exceed the height limit of the 25 feet.

### **Agricultural Resources**

**Coastal Act 30241.** *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 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.*
- 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 non-agricultural 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) of this section, and all development adjacent to prime agricultural lands shall not diminish the productivity of such prime agricultural lands.*

**Coastal Act 30242.** *All other lands suitable for agricultural use shall not be converted to non-agricultural 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. Any such permitted conversion shall be compatible with continued agricultural use on surrounding lands.*

**Article II Section 35-1440.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. (Article II Section 35-1440 and Appendix H incorporated by reference)*

**Reason for Inconsistency:** The project site abuts Agriculture I (AG-I-10, 10 acres minimum parcel size), zoning and agricultural land uses to the north. The California Department of Conservation classifies the northern portion of the Project site, as well as the abutting agricultural area north of the project site as Prime Farmland. Additionally, soils within the same area are identified as Class I prime soils. The project site is located within an Existing Developed Rural Neighborhood, as designated on the Coastal Land Use Plan maps, and is located immediately adjacent to land that is in the Rural Area. Pursuant to Article II Section 35-1440, the applicable agricultural buffer width requirement is 200 feet minimum and 300 feet maximum. The proposed project requests a waiver under State Density Bonus Law for reduction of the required agricultural buffer width to 0 feet (and effective elimination of associated requirements for lighting, landscaping, irrigation, and maintenance of the agricultural buffer area).

The application materials include a Farmland Impact Study (November, 2022) that provides a preliminary screening of the project site's agricultural viability, but does not address the impacts of the proposed project (and requested agricultural buffer reduction) on adjacent agricultural lands. As currently proposed, the project may adversely affect prime agricultural lands adjacent to the project site, and as such, is inconsistent with agricultural resource protection policies identified above. Supplemental analysis of the proposed project's impact on adjacent agriculture is needed to determine consistency with the agricultural resource protection policies identified above. Additionally, this assessment will be required to support environmental review of the project under CEQA.

### **Services**

**Article II Section 35-60.5 and Coastal Land Use Plan Policy 2-6:** *Prior to issuance of a development permit, the County shall make the finding, based on information provided by environmental documents, staff analysis, and the applicant, that adequate public or private services and resources (i.e., water, sewer, roads, etc.) are available to serve the proposed development. The applicant shall assume full responsibility for costs incurred in service extensions or improvements that are required*

*as a result of the proposed project. Lack of available public or private services or resources shall be grounds for denial of the project or reduction in the density otherwise indicated in the land use plan...*

**Coastal Act 30250.** *(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.*

**Reason for Inconsistency:** Supplemental information/detail is required within the application materials to demonstrate adequate services (roads/access) are available to serve the proposed project, as well as to demonstrate consistency with County Engineering Design Standards<sup>1</sup>. The following supplemental information/detail is required (as identified by the Public Works Department, Transportation Division):

- a. Full width of all County, City and Caltrans Rights of Way shall be shown on the plans with all encroachments (poles, signs, fire hydrants, driveways, etc.)
- b. A full drainage study shall be done for all roadways that demonstrate post development flows are less than or equal to pre-development flows. The study shall show how much roadway is open for travel in each flow event.
- c. A traffic study shall be provided, to County Traffic Study Guidelines. The study shall include a VMT analysis, to CAPCOA guidelines, that clearly documents all reduction strategies with formulas. Other items to include shall be: queueing analysis for all driveways, sight distance analysis for all driveways, stop and signal warrants, all County turn lane nomographs plotted with values, collision analysis for all roadways and any mixed-use reduction worksheets to NCHRP 684 guidelines.
- d. Full roadway improvement plans shall be provided that clearly show full right of way width, all encroachments, driveways, curbs, gutter, sidewalk, parkway, islands, signing, striping and centerline radii with all items dimensioned. All plans shall include plan and profile drawings stationed every 25 feet. All driveways and intersections shall have sight distance triangles placed on the landscape and signing/striping plans.
- e. All driveway profiles shall be provided in conformance with the Santa Barbara County Engineering Design Standards, Plate 4-060, unless approved otherwise by a design exception, signed and stamped by the director of Public Works.

Additionally, the project proposes secondary ingress/egress (and associated improvements) from the project site over Pandanus Lane, a private alley under separate ownership. Documentation of legal access over Pandanus Lane is required to demonstrate consistency with the adequate services policies.

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<sup>1</sup> County Engineering Design Standards: <https://content.civicplus.com/api/assets/87ec676d-5f01-4f1e-abd4-c5ec03116042>

The project also proposes improvements within the City of Carpinteria right-of-way. Please see the enclosed letter from the City of Carpinteria for further discussion of policy consistency.

***Article II Section 35-148.1.b and Coastal Land Use Plan Policy 2-10.*** *Annexation of a rural area(s) to a sanitary district or extensions of sewer lines into rural area(s) as defined on the Coastal Land Use Plan maps shall not be permitted unless required to prevent adverse impacts on an environmentally sensitive habitat, to protect public health, or as a logical extension of services.*

**Reason for Inconsistency:** The project site is located in the rural area as defined on the Coastal Land Use Plan maps, and requires annexation into the Carpinteria Sanitary District and extension of sewer lines to the project site. As such, the project is inconsistent with Article II Section 35-148.1.b. and Coastal Land Use Plan Policy 2-10.

Additionally, the scope of the proposed project was revised following submittal of the Carpinteria Sanitary District Intent to Serve letter dated February 16, 2023. An updated Intent to Serve letter is required to determine consistency with the adequate services policies identified above.

***Coastal Act 30231.*** *The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored though, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.*

***Article II Section 35-60.1 and Coastal Land Use Plan Policy 2-2:*** *The long term integrity of groundwater basins or sub-basins located wholly within the coastal zone shall be protected. To this end, the safe yield as determined by competent hydrologic evidence of such a groundwater basin or sub-basin shall not be exceeded except on a temporary basis as part of a conjunctive use or other program managed by the appropriate water district. If the safe yield of a groundwater basin or sub-basin is found to be exceeded for reasons other than a conjunctive use program, new development, including land division and other use dependent upon private wells, shall not be permitted if the net increase in water demand for the development causes basin safe yield to be exceeded, but in no case shall any existing lawful parcel be denied development of one single family residence. This policy shall not apply to appropriators or overlying property owners who wish to develop their property using water to which they are legally entitled pursuant to an adjudication of their water rights.*

**Reason for Inconsistency:** The application materials included a Preliminary Water Demand Study dated July 13, 2023 and a Carpinteria Valley Water District Intent to Serve Letter dated June 1, 2023. The scope of the proposed project was revised following submittal of these materials.

Updated application materials that reflect the current scope of the proposed project are needed to determine consistency with the adequate services policies identified above.

### **Air Quality**

***Coastal Act 30253.c.*** *New development shall do all of the following: (c) Be consistent with requirements imposed by an air pollution control district or the State Air Resources Board as to each particular development.*

***Coastal Land Use Plan Policy 11-1:*** *The provisions of the Air Quality Attainment Plan shall apply to the coastal zone.*

**Reason for Inconsistency:** Supplemental information/detail is required to demonstrate consistency with air quality policies identified above. Please provide an air quality and greenhouse gas technical report (AQTR) for the proposed project. The AQTR should quantify criteria pollutants and greenhouse gases emissions from all project phases (construction and operational) and from all potential emission sources associated with the proposed project, including but not limited to, emissions from mobile sources, permitted and unpermitted combustion equipment, and indirect greenhouse gas emissions from electricity use, water use, and waste disposal. The AQTR should utilize project-specific trip generation rates from a Traffic Study/Trip Generation Study when estimating the project's mobile emissions. Such assessment is necessary to determine consistency with the applicable policies noted above.

Additionally, this assessment will be required to support environmental review of the project under CEQA. Project applicants proposing projects that exceed the screening table established in SBCAPCD's Scope and Content of Air Quality Sections in Environmental Documents, shall prepare and submit a technical assessment evaluating potential project operation-related air quality impacts to the County for review and approval. The evaluation shall be prepared in conformance with the County and SBCAPCD methodologies for assessing air quality impacts identified in the County's Environmental Thresholds and Guidelines Manual and SBCAPCD's Scope and Content of Air Quality Sections in Environmental Documents.

### **Biological Resources (Tree Removal)**

***Article II Section 35-140.2 and 35-140.3.*** *A Coastal Development Permit under Section 35-169 shall be required for the removal of any tree which is six inches or more in diameter measured four feet above the ground and six feet or more in height and which is 1) located in a County street right-of-way; or 2) located within 50 feet of any major or minor stream except when such trees are removed for agricultural purposes; or 3) oak trees; or 4) used as a habitat by the Monarch Butterflies.*

*In addition to the requirements for the issuance of a Coastal Development Permit set forth in Section 35-169, a Coastal Development Permit for the removal of trees shall not be issued unless the Coastal Planner makes one of the following findings:*

1. *The trees are dead.*
2. *The trees prevent the construction of a project for which a Coastal Development Permit has been issued and project redesign is not feasible.*
3. *The trees are diseased and pose a danger to healthy trees in the immediate vicinity, providing a certificate attesting to such fact is filed with the Planning and Development Department by a licensed tree surgeon.*
4. *The trees are so weakened by age, disease, storm, fire, excavation, removal of adjacent trees, or any injury so as to cause imminent danger to persons or property.*

***Coastal Land Use Plan Policy 3-14:*** *All development shall be designed to fit the site topography, soils, geology, hydrology, and any other existing conditions and be oriented so that grading and other site preparation is kept to an absolute minimum. Natural features, landforms, and native vegetation, such as trees, shall be preserved to the maximum extent feasible. Areas of the site which are not suited for development because of known soil, geologic, flood, erosion or other hazards shall remain in open space.*

***Coastal Land Use Plan Policy 9-35:*** *Oak trees, because they are particularly sensitive to environmental conditions, shall be protected. All land use activities, including cultivated agriculture and grazing, should be carried out in such a manner as to avoid damage to native oak trees. Regeneration of oak trees on grazing lands should be encouraged.*

***Coastal Land Use Plan Policy 9-36:*** *When sites are graded or developed, areas with significant amounts of native vegetation shall be preserved. All development shall be sited, designed, and constructed to minimize impacts of grading, paving, construction of roads or structures, runoff, and erosion on native vegetation. In particular, grading and paving shall not adversely affect root zone aeration and stability of native trees.*

**Reason for Inconsistency:** The project, as currently proposed, includes removal of 49 coast live oak trees and 5 California sycamore trees with diameters of 6-inches and greater. Currently, 100% of the trees on site are proposed for removal.

**Departmental/Agency Notices of Inconsistency**

Please see the additional enclosed notices of inconsistency:

- Carpinteria-Summerland Fire Protection District Letter, dated September 11, 2024
- Flood Control and Project Clean Water Letter, dated September 12, 2024
- Surveyor's Office Memorandum, dated September 10, 2024
- Community Services Department - Parks Division Letter, dated September 13, 2024
- City of Carpinteria Letter, dated September 16, 2024

Additionally, Resource Recovery and Waste Management Division consistency review comments are copied below:

#### Suitable Level of Waste Service

- It is generally assumed that large multi-family properties (with 5 units or more) generate 0.3 yards of weekly waste per bedroom. This development is proposing 132 total bedrooms across 182 total units, resulting in an estimated ~39.6 weekly cubic yards of waste produced weekly. It appears that 16 dumpsters are proposed across 4 waste enclosures. Assuming the dumpsters proposed will be 4-yard dumpsters, these would have to be serviced 2-3 times per week to meet the estimated ~40 cubic yards of waste produced weekly. See the different dumpster sizes provided by the hauler in this region below, all of which can be serviced up to 6 times per week.

| BIN MEASUREMENTS |            |        |       |
|------------------|------------|--------|-------|
| Size             | Height (B) | Depth  | Width |
| 1.5yrd           | 3' 9"      | 2' 6"  | 6' 9" |
| 2yrd             | 4' 3"      | 2' 11" | 6' 9" |
| 3yrd             | 5'         | 3' 6"  | 6' 9" |
| 4yrd             | 5' 7"      | 4' 3"  | 6' 9" |

- It would be prudent to keep in mind this general rule of 0.3 yards of weekly waste per bedroom and plan for the resulting level of waste services accordingly. This is because once built and operating, per [County Code Chapter 17-92](#), the County has the right to review the number and frequency of a generator's containers to evaluate if adequacy capacity is provided, and owners of multi-family residential dwellings shall adjust their service level as requested by the County if deemed insufficient for the amount of waste generated on-site. The applicant should plan for a sufficient volume of waste service now, rather than be identified by the County as not providing sufficient levels of waste service once built and operating and potentially being required to re-enter the planning process to adjust for appropriate levels of waste service. Please note, It is always recommended that project design allow for more waste containers on-site at a lower frequency of weekly pickups instead of relying on a higher frequency of weekly pickups for fewer containers on-site. This is because it is much cheaper comparatively to have space to place more containers on-site serviced fewer times per week, and much more expensive comparatively to increase the weekly frequency of pickups of fewer containers.

#### Mandatory Commercial Recycling

- Per the [County's Mandatory Commercial Recycling ordinance](#), all commercial businesses and/or multi-family properties with 5 units or more regardless of the amount of waste produced must arrange for recycling services and divert all recyclable materials produced from the trash. Additionally, per [State Law AB 341, Mandatory Commercial Recycling \(MCR\)](#), all commercial business or multi-family properties with 5 units or more with 4 cubic yards or more of total solid waste per week must arrange for recycling services and divert all recyclable materials produced from the trash. Therefore, the applicant is required to plan for recycling waste services when designing this development. **Please**

**indicate that recycling service will be provided to residents as part of this project to meet these state and local requirements.**

#### Mandatory Commercial Organics Recycling

- Per [State Law SB 1383, Short Lived Climate Pollutants Reduction Strategy \(SLCP\)](#), all commercial businesses and residents must divert their organic waste from the landfill. Organic waste includes yard waste, food waste, and wet/soiled paper. For most businesses and multi-family properties in California, this means that they need to subscribe to organic waste service to dispose of these materials separately from the trash. However, this project is located within the County's ReSource Center watershed. This means that all trash produced in this region goes to the County's state-of-the-art ReSource Center for processing, where organics are sorted out of the trash and composted on-site. **Therefore, this project will already be compliant with SB 1383, and is not required to plan for organic waste services in addition to trash and recycling services.** However, it is highly recommended that this project design space for yard waste services if those materials will be disposed of on-site rather than taken off-site by landscapers.

#### Accessibility & Public View

- Per [Section 17-8](#) of County Code, it is the duty of every responsible party to keep waste receptacles in good condition and in a suitable place readily accessible to the collector for removing and emptying the waste receptacles. The applicant should include on their plans where they plan to store all waste receptacles and ensure that accessibility is provided to the collector so receptacles may be serviced in a safe and orderly fashion. Please have the applicant consider the dimensions provided above when ensuring waste containers are readily accessible to the collector/hauler. **This requirement is met for this project since all waste containers would be stored within an enclosure that appears to have adequate ingress/egress to be removed onto the private road for service and replaced within the enclosure.**
- Additionally, per County Code Chapter 17-8, all waste receptacles shall be maintained on the property out of public view and not placed within the limits of any street, public right-of-way or other public place in the county or in such a place or manner as to constitute a nuisance. Excepting placement at the curbside pickup site on scheduled collection service day(s) for rolling carts, all waste receptacles need to be stored out of public view. The applicant may accomplish this by designing for an enclosure to house waste receptacles and identifying where an enclosure will be located on the plans. The applicant may otherwise show on the plans that all waste receptacles would be stored in an area where they are obstructed from public view. **This requirement is met for this project since all waste containers would be stored within an enclosure and is consistent with Chapter 17.**

**State Density Bonus Law (SDBL)**

SDBL allows developers to request to modify or remove certain development standards in order to make their project economically and physically feasible. These requests fall under two categories:

- **Concessions/incentives.** Pursuant to Government Code Section 65915 (d)(1) & (k)(1) developers can utilize concessions or incentives to deviate from site development standards, zoning code requirements, or architectural design requirements when doing so would result in identifiable and actual cost reductions, in order to provide for the affordable housing. The project as currently proposed is eligible for three incentives/concessions because it includes at least 24% of total units for lower income households. (Government Code Section 65915(d)(2)(C).)
- **Waivers/Modifications.** Pursuant to Government Code Section 65915(e)(1) and § 65915(e)(2), a developer can reduce or modify development standards, as defined in the statute, when those requirements will have the effect of physically precluding the construction of a development at the allowed density or with the concessions or incentives permitted under State Density Bonus Law. Unlike concessions/incentives, there are no financial criteria required for granting a waiver.

Please clearly identify all requested concessions/incentives and waivers. For requested concessions/incentives, also provide information on how the concession or incentive results in identifiable and actual cost reductions to provide for affordable housing costs.

SDBL “does not supersede or in any way alter or lessen the effect or application of the California Coastal Act.” (Government Code Section 65915(m).) The application of any incentives/concessions/waivers shall be permitted in a manner that is consistent with and harmonized with the Coastal Act.

**Our review is based on the following project description:**

**Development Plan:** To allow construction of 132 market-rate housing units contained in six apartment buildings, and 49 affordable housing units and 1 manager’s unit contained in one apartment building. Associated residential accessory development includes a detached community amenity building, a pool and spa area, a community garden, a community playground, two fenced community dog parks, onsite circulation, parking and drive aisles, bicycle parking, trash enclosures, landscaping and flatwork, lighting, and fencing. The project site consists of two parcels, 3.78 acres and 3.20 acres in size, zoned 3-E-1 and shown as Assessor's Parcel Numbers (APN) 001-080-045 and 001-080-046, located at 1101 and 1103 Bailard Avenue in the Carpinteria Area, First Supervisorial District.

- **Site Statistics.** The site design will include 64,179 gross square feet of building coverage, 96,490 gross square feet of driveway, drive aisles, and parking, 108,548 gross square feet of common open space, and 86,530 gross square feet of landscaping.
- **Market Rate Units.** The 132 market rate units will be comprised of six individual buildings:
  - Five “Type B” buildings, each totaling 25,075 gross square feet, containing twelve 1BR/1BA units and twelve 2BR/2BA units, with a maximum building height of 45’.
  - One “Type D” building totaling 18,153 gross square feet, containing twelve 3BR/3BA units, with a maximum building height of 42’-3”.
- **Affordable Rate Units.** The 49 affordable units (units available to those making less than 80% of the Area Median Income (AMI)), and 1 manager’s unit will be contained within one building totaling 46,043 gross square feet, with a maximum building height of 46’-2”, and containing ten studio units, thirty 1BR/1BA units, and ten 2BR/1BA units.
- **Community Amenity Building.** The project will include a community amenity building that will be 3,258 gross square feet, with a maximum building height of 24’-8”. The community amenity building will contain a reception area, offices, mailroom, fitness center, lounge area, restrooms, showers, pool equipment, and maintenance storage area. The community amenity building will be equally accessible to all unit types.
- **Open Space.** The project will include a total of 108,548 gross square feet (35.7%) of common open space comprised of landscape areas, the pool and spa area, the community garden, the community playground, and the two fenced dog parks. All common open space amenities will be equally accessible to all unit types.
- **Landscaping.** The project will include 86,530 square feet of landscaping. Irrigation water for landscaping will be provided by Carpinteria Valley Water District.
- **Grading and Drainage.** Grading for site development is estimated to require 11,550 cubic yards of cut, 10,700 cubic yards of fill, and 850 cubic yards of export.
- **Access.** Primary access to the project site will be provided off Bailard Avenue. Secondary “emergency only” access will be provided off Pandanus Alley (private alley; easement to be obtained). Onsite access/circulation will be via a looped, two-way, 28-foot wide drive isle. The project includes improvement of the Bailard and Pandanus intersection with a proposed roundabout design.
- **Vehicle Parking.** The project includes 262 vehicle spaces, including:
  - 186 covered spaces, and
  - 76 uncovered spaces.

- **Bicycle Parking.** The project includes 40 bicycle parking spaces, including:
  - Five short-term, covered bicycle parking areas supporting 24 bicycles, and
  - One indoor, long-term bicycle storage room within the affordable rate building supporting 16 bicycles.
- **Phasing.** Project grading and infrastructure (i.e., utilities, access, detention, development pad grading, etc.) will be constructed in a single phase. Construction of the apartments will occur in a single phase and the affordable apartment units will be constructed prior to occupancy of market rate units.
- **Utilities and Service.** Water will be provided by the Carpinteria Valley Water District. Sewer service will be provided by the Carpinteria Sanitary District, which requires annexation into the District's service boundary via LAFCO. The property will be served by the Carpinteria-Summerland Fire Protection District and the Santa Barbara County Sheriff.
- **Demolition.** The project site is currently developed with single-family dwellings and accessory structures, which are leased to tenants. APN 001-080-045 includes a single-family dwelling and an accessory structure/guesthouse. APN 001-080-046 includes a single-family dwelling and attached garage, an accessory structure/guesthouse, and a detached garage. All existing structures will be removed under the scope of the project and existing private onsite wastewater treatment (septic) systems will be abandoned.

**Lot Line Adjustment:** To adjust the boundary line between two parcels consisting of 3.78 gross acres (existing Parcel 1; APN 001-080-045) and 3.20 gross acres (existing Parcel 2; APN 001-080-046) into a 1.29 gross acre lot (proposed Parcel 1) and a 5.69 gross acre lot (proposed Parcel 2) as follows:

|                 | Existing Size (gross/net) | Proposed (gross/net)    | Change in Lot Area   |
|-----------------|---------------------------|-------------------------|----------------------|
| <b>Parcel 1</b> | 3.78 acres / 3.60 acres   | 1.29 acres / 1.29 acres | - 2.49 acres (- 66%) |
| <b>Parcel 2</b> | 3.20 acres / 3.01 acres   | 5.69 acres / 5.32 acres | - 2.49 acres (+78%)  |
| <b>Total</b>    | 6.97 acres / 6.61 acres   | 6.97 acres / 6.61 acres |                      |

## Advisories

P&D has the following advisory statements:

1. **CEQA Review.** The proposed project is subject to review pursuant to the California Environmental Quality Act (CEQA). Upon resolution of the identified project inconsistencies, staff will begin evaluation of your project pursuant to CEQA. Additional studies and/or information may be required to evaluate your project under CEQA.

2. **Application Forms.** The submittal materials identify the Housing Authority of the County of Santa Barbara (HACSB) as a co-applicant. Application forms are required for all project applicants. Please provide application forms for HACSB.
3. **Departmental Clearance.** Before scheduling your project for a decision maker hearing, clearances and/or condition letters must be obtained from applicable County agencies and departments, such as County Fire, Transportation, Flood Control, Surveyor, Environmental Health Services, and Air Pollution Control District. Any information requested from these departments should be submitted in a timely manner in order to avoid any delays in scheduling your project for decision maker action. P&D staff will contact you immediately upon receipt of such requests.
4. **State Density Bonus Law (SDBL).** SDBL Section 659159(m) states: *“This section does not supersede or in any way alter or lessen the effect or application of the California Coastal Act of 1976 (Division 20 (commencing with Section 30000) of the Public Resources Code). Any density bonus, concessions, incentives, waivers or reductions of development standards, and parking ratios to which the applicant is entitled under this section shall be permitted in a manner that is consistent with this section and Division 20 (commencing with Section 30000) of the Public Resources Code.”* For each density bonus, incentive/concession, and waiver requested, consistency with the California Coastal Act shall be demonstrated.
5. **Special Studies.** Please be advised the following special studies are anticipated to be required for the project’s environmental review under CEQA:
  - a. Aesthetics Renderings
  - b. Air Quality Analysis and Green House Gas Technical Report
  - c. Biological Report
  - d. Soils Report
  - e. Engineering Geology Investigation
  - f. Environmental Assessment Report (Hazmat)
  - g. Noise Study
  - h. Public Services Impact Estimates (Fire, Police, Schools)
  - i. Traffic/VMT study/Circulation Study/Accident Analysis
  - j. Sight Distance Analysis
  - k. Water Assessment (Quantity and Allocation)
6. **On-Site Sewage Disposal.** P&D staff encourages you to contact Environmental Health Services (EHS) as early in the permitting process as possible, since the project includes the abandonment of existing septic systems. This review will be required prior to approval of your project. Please contact EHS at (805) 681-4900 as soon as possible to expedite your review. Please also notify me when the application to EHS has been filed and provide me a

copy of that application, and I will coordinate with EHS to discuss septic abandonment requirements.

7. **Secondary Access.** Prior to the decision maker hearing on the project, demonstration of legal access for the proposed secondary ingress/egress from Pandanus Alley will be required.
8. **Landscape Bonding.** Performance securities will be required prior to Zoning Clearance Issuance for landscaping pursuant to Article II Section 35-115.
9. **California Water Conservation in Landscaping Advisory.** The project is subject to the California Water Conservation in Landscaping requirements. Prior to issuance of the ZCI, the Owner/Applicant shall fill out, obtain the stamp of the appropriate licensed professional as appropriate, sign, and submit to P&D a Water Efficient Landscape Ordinance application, as appropriate to the size of the landscape area.
10. **Road Encroachment Permit.** The proposed project fronts along the City of Carpinteria's road right-of-way, as well as contains elements that extend into the City's right-of-way. We recommend that you coordinate with their Public Works Department early in the site design process to ensure that the required public improvements are included in the project plans. Additionally, prior to issuance of the Zoning Clearance an Encroachment Permit from the City's Public Works Department will be required.
11. **Zoning Clearance.** Assuming the proposed project is approved, a Zoning Clearance will be required to effectuate the DVP pursuant to Article II Section 35-179.7.
12. **Development Impact Mitigation Fees.** Your project, if approved, will be subject to the payment of development impact mitigation fees. The total amount of fees will be estimated during the processing of this application. If you feel that the project should not be subject to such fees, based on the absence of a reasonable relationship between the impacts of the proposed project and the fee category for which fees have been assessed, you may appeal to the Board of Supervisors for a reduction, adjustment or waiver of any of those fees. An appeal must be made in writing and must state the factual basis on which the particular fee or fees should be reduced, adjusted or waived. The appeal must be submitted to the director(s) of the relevant departments within 15 calendar days following approval of the project.
13. **Advisory on Fees.** If your project requires an environmental document, you will be charged for time spent by staff preparing the document. If an EIR is required and an outside consultant is required to prepare the EIR, the County will work with you to select a private consulting firm to prepare the document. The applicant is responsible for paying all consultant and staff costs associated with the EIR preparation.

Effective January 1, 2007, all environmental documents must be sent to the Department of Fish and Game for review and comment. The Department of Fish and Game charges a filing fee pursuant to Section 711.4 of the California Fish and Game Code. These fees shall be paid at the end of the environmental review process prior to filing the Notice of Determination. Furthermore, pursuant to Section 711.4(c)(3) of the Fish and Game Code, "no project shall be operative, vested or final, nor shall local government permits for the project be valid until the filing fees required pursuant to this section are paid."

Additionally, effective July 5, 2018, County Clerk of the Board charges an Administrative Handling Fee for all environmental document filings including Notice of Exemptions and Notice of Determinations. Please refer to the Clerk of the Board's website for the most up-to-date fees (<http://countyofsb.org/ceo/cob/cega.sbc>). This fee shall be paid at the time the document is filed with the Clerk of the Board.

All of the information and advisories contained in this letter are based on the current project description as provided above. Please be aware that substantial changes to your project may affect the time estimates, fees, and levels of review outlined in this letter.

If you have any questions regarding this letter, please contact me at [avosburg@countyofsb.org](mailto:avosburg@countyofsb.org) or at (805) 934-6259.

Sincerely,

 Digitally signed by Alia Vosburg  
Contact Info:  
[avosburg@countyofsb.org](mailto:avosburg@countyofsb.org)

Alia Vosburg, Planner  
Development Review Division



Protecting the beauty & natural  
resources of our valley since 1964

# Carpinteria Valley Association

PO Box 27, Carpinteria, CA 93014

carpinteriavalleyassociation@gmail.com

**Submitted via email to:**  
SouthCentralCoast@coastal.ca.gov

October 30, 2025

**Public Comment on November 2025 Agenda Item Thursday 11a – County of Santa Barbara LCP Amendment No. LCP-4-STB-24-0028-1-Part B (Housing Element Update/Rezoning).**

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## **SUMMARY OF OUR RECOMMENDATION:**

**We urge that the rezoning be denied for sites located in the Coastal Zone that are outside the Urban/Rural Boundary (Van Wingerden 1, Van Wingerden 2, and Bailard), and that the Urban/Rural Boundary not be modified.**

## **BACKGROUND:**

**Santa Barbara County has demonstrated lack of understanding/recognition of the Urban/Rural Boundary as mapped by Santa Barbara County.**

To provide context for our recommendations, we provide the following brief summary of certain events that occurred during Santa Barbara County's development of their Housing Element Update:

1. On Dec 5, 2022, a meeting was arranged by Supervisor Das Williams that included Supervisor Williams, County Planning & Development (P&D) staff members, and a dozen or so Carpinteria community members. At that meeting, Supervisor Williams and the P&D staff members incorrectly stated that the Bailard site was located inside the County's mapped Urban/Rural Boundary. I stated that was not true and proved it by showing the P&D staff members the County's online interactive map that clearly showed that the Bailard site is located outside the Urban/Rural Boundary. The P&D staff members agreed they had been in error.
2. On Jan 19, 2023, the Carpinteria *Coastal View News* newspaper published an interview with P&D Director Lisa Plowman (page 4) that quoted Director Plowman incorrectly stating the Bailard site is within the Urban/Rural Boundary. I emailed P&D pointing out the error and suggesting that Director Plowman contact the *Coastal View News* to have a correction printed. A correction was printed in the Jan 26, 2023 edition.
3. In the Draft PEIR for the County of Santa Barbara 2023-2031 Housing Element Update, in Table 3.10-4, at the top of page 3.10-59, the document incorrectly stated that all potential rezone sites are located outside the Coastal Zone and the jurisdiction of the CLUP. This is not true as Van Wingerden 1, Van Wingerden 2, and Bailard are in the Coastal Zone and therefore subject to CLUP policies. In Comment Response O.1-2, this error is acknowledged, and there is a description of the updates made



in the Proposed Final PEIR. However, the conclusion for the CLUP section of Table 3.10-4 remains "Potentially Consistent" where it should have been changed to "Potentially Inconsistent".

## **RATIONALE FOR OUR RECOMMENDATION:**

The sequence of errors by P&D staff documented above is unfortunate. The importance of the Urban/Rural Boundary and the protections of the California Coastal Act in the Coastal Zone are fundamental to good planning and have been critical in protecting the Carpinteria Valley for decades. This apparent pattern of disregard by Santa Barbara County for the importance of a stable and well-planned Urban/Rural Boundary is deeply concerning, and we feel it influenced the proposal in front of the Coastal Commission now. Our goal is that the legacy of sound planning be continued.

### **The existing Urban/Rural Boundary was drawn after careful comprehensive analysis and has been stable for decades:**

The three Carpinteria Valley sites that are in the Coastal Zone (Van Wingerden 1, Van Wingerden 2, and Bailard) are all also located outside the County's mapped Urban/Rural Boundary. In fact, they are the only sites in the entire County that were analyzed for rezoning in the EIR that are outside the Urban/Rural Boundary.

The existing carefully-defined and stable Urban/Rural Boundary is an important planning tool for preventing sprawl and its associated problems. The purpose of the Urban/Rural boundary is to mark the outer limit beyond which urban development will not be allowed. Its aim is to discourage sprawl by containing urban development.

It is unacceptable to expand this boundary solely because it is inconvenient and restricts where new high-density housing can be built. The whole point of County policy defining the Urban/Rural Boundary is to prevent development that is inappropriate in this location.

In fact, the proposal to expand the boundary to include Bailard necessitates the further expansion of the boundary to include the adjacent parcel west of Bailard (APN 001-080-009). While that parcel is not proposed to be rezoned, its redesignation from Rural to Urban is just another step in the inevitable encroachment of the Urban Area further into the Rural Area if the existing long-standing Urban/Rural Boundary is not maintained unchanged.

Section 3.8.2 of the County's Coastal Land Use Plan states: "Within the County's coastal zone, the need for clearly defined urban/rural boundaries is especially apparent on the South Coast, where prime coastal agriculture has given way to urban expansion in a rapidly developing area." That document continues with a description of how the Urban/Rural Boundary was determined for the purpose of preserving existing agricultural lands, not as a transitional land use but for agricultural use over the long term. Expanding the Urban/Rural Boundary now disregards existing County policy and sound planning principles.



**The conclusion in the Coastal Commission staff report about changes to the Urban/Rural Boundary improving it is not supported by the data:**

The staff report asserts, “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.”

This statement is not a conclusion based on any data presented, but rather an unsupported assertion. We urge you to look at the map showing the existing Urban/Rural Boundary and the three proposed rezone sites to be added to it. The proposed new boundary would not be more “logical”, and there is no reason to believe it would be more “stable” than the existing boundary. In fact, what has made the existing boundary stable is the refusal to modify it! Approving the modification now would set the precedent that future modifications would be possible. That is the opposite of “ensuring a permanent limit to urban development”. Maintaining the existing boundary is the only way to ensure this permanent limit.

Again, look at the map and notice the number of parcels that border the Urban/Rural Boundary. If any of the three subject properties were rezoned and the boundary expanded to include them, many of the other properties could very reasonably argue that they meet the same criteria and should be added, for example when the County is looking to meet RHNA requirements in the next cycle.

The result would be urban sprawl, which is exactly what we all say we are trying to avoid.

**Agricultural viability of existing agricultural operations would be adversely impacted if the rezones are approved:**

Regarding the proposed expansion of the Urban/Rural Boundary, the staff report states, “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”.

This statement is also not supported by the facts. If the boundary is expanded for the purpose of providing high-density housing, it is likely that speculative investors will purchase agricultural lands along the Urban/Rural Boundary with the expectation that they will be able to get a rezone approved in the next RHNA cycle. These land purchases would drive up land values on other agricultural properties, increasing property taxes and therefore have very real financial impacts to existing agricultural operations. This is not pure conjecture, but similar to what happened in recent years in the Carpinteria Valley when agricultural properties with greenhouses were purchased by investors hoping to hit the jackpot by growing cannabis.

In fact, the potential impact to neighboring agricultural operations is evidenced by the fact that ten of the farmers who would be impacted by high-density development of Bailard made it abundantly clear in a 2021 *Coastal View News* article (“Locals Unite in Opposition to Proposed Housing Project on Bailard Avenue”) that they oppose such a development as a violation of the agricultural buffer zone and a threat to their agricultural operations.



**The proposed rezones would destroy an important buffer between urban and agricultural uses that minimizes conflicts between these fundamentally different land uses:**

The properties proposed for rezone, especially the Bailard property, provide valuable buffers between residential and larger agricultural operations.

To the south of the Bailard site is residential development inside the Carpinteria City Limit. To the north are large agricultural parcels of at least 10 acres each. Such urban and rural land uses cause conflicts when they are immediate neighbors – people in their homes are sensitive to the noise, dust, smoke, odors, insects, aerial pesticide spraying, and other aspects of normal agricultural operations. The well-proven solution is to plan a buffer between the two uses, such as low-density residential zoning.

In the case of the Bailard property, the buffer is zoned for one residential unit per three acres (County zoning 3-E-1 “Estate Residential”) and designated in the County Coastal Land Use Plan for Residential use with a maximum density of one unit per three acres (RES-0.33). The present land use there is a small organic farm that serves well the function of the buffer.

The proposed project would replace that buffer with even higher-density residential units that would cause conflicts with the immediately neighboring agriculture, and likely the existing residential area as well.

Such conflicts would create additional challenges for existing agricultural operations, in direct contradiction to the staff report statement that “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”.

**CONCLUSION:**

In general, it is poor planning to put the highest-density residential development in the entire Carpinteria Valley at the edge of the existing city, outside the city limit, in fact requiring modification to the long-established and effective Urban/Rural Boundary to allow it. Making the proposal even worse is that it includes solely residential development with a lack of the amenities required to support it nearby (employment, shopping, transit, schools, etc.). This would require residents to drive into the city’s core to access those amenities. It should be noted that the City of Carpinteria has repeatedly and strongly opposed these rezones and continues to do so.

Therefore, we urge that the sites located in the Coastal Zone that are outside the Urban/Rural Boundary (Van Wingerden 1, Van Wingerden 2, and Bailard) not be rezoned, and the Urban/Rural Boundary be left intact as it is.

Thank you,

Mike Wondolowski  
President  
Carpinteria Valley Association  
[carpinteriavalleyassociation@gmail.com](mailto:carpinteriavalleyassociation@gmail.com)

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**FW: Resend of Attn Denise Re:Public Comment on Nov 2025 Agenda Item Th11a – County of SB LCP Amendment**

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**From** SouthCentralCoast@Coastal <SouthCentralCoast@coastal.ca.gov>

**Date** Mon 11/3/2025 8:09 AM

**To** Gonzalez, Denise@Coastal <Denise.Gonzalez@coastal.ca.gov>

 13 attachments (12 MB)

Attachment 3 .pdf; Attachment 5.pdf; Attachment 6.pdf; Attachment 7 .pdf; Attachment 8.docx; Attachment 9.docx; Attachment 10.docx; Attachment 11.pdf; Attachment 12.pdf; Attachment 13.docx; Attachment 14.pdf; Attachment 1.jpeg; Attachment 4 .jpeg;

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**From:** Susie Anderson <susie@ronandersonart.com>

**Sent:** Friday, October 31, 2025 4:39 PM

**To:** SouthCentralCoast@Coastal <SouthCentralCoast@coastal.ca.gov>

**Subject:** Resend of Attn Denise Re:Public Comment on Nov 2025 Agenda Item Th11a – County of SB LCP Amendment

You don't often get email from susie@ronandersonart.com. [Learn why this is important](#)

**To:** Commissioners, CA Coastal Commission

**From:** Susie Anderson

410 Palm Avenue Apt A2

Carpinteria, CA 93013

Chair and Commissioners,

The Carpinteria Urban/Rural Boundary should be preserved, and the existing Buffer Zone must remain intact. The Bailard property should not be rezoned.

At the 2024 04 01 PAD Rezone Hearing, 1st District Commissioner Michael Cooney, stated: "I understand what you're saying and I understand the difference between the 2 roads that would be followed by the developer but, you know, I really think in spite of the fact that the Carpinteria Area, District one does need additional housing sites, I am satisfied that the element of how crowded the immediate area around the site is, I can't make the recommendation to the Board that that site be included." All commissioners voted against the rezone.

[http://sbcounty.granicus.com/player/clip/4700?view\\_id=11&redirect=true](http://sbcounty.granicus.com/player/clip/4700?view_id=11&redirect=true) Time Stamp 5:46:20

Following are my comments by page re CCC 2025 10 16 Staff Report Th11a with evidences attached.

Page 3 *"The site is developed with four residences, accessory structures, and approximately 3 acres of seasonal row crops..."*

There are only four structures total: one residence and one outbuilding each on 1101/1103 Bailard and 5 acres of row crops.

Attachment 1 Google aerial

Page 3 *"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."*

This implies that there is a viable development application. There is not. The proposed rezone, which would pave viable farmland including both Prime and Land of Statewide Importance, is based on an application that prompted the 2024 09 17 SB County 89-page PAD Determination of Inconsistency.

Attachment 2

Page 3 *"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..."*

Ten of the farmers with existing agricultural operations adjacent to Bailard do not agree with the above statement. In their 2021 published letter they oppose the development as a violation of their Farmers' Right to Farm.

Attachment 3

For many years, my two sons and their families lived in the houses on Bailard. They experienced drifting odors, dust, and loud noise that could be constant throughout daylight hours. They had to vacate the property or lock down during routine aerial pesticide spraying. The still photo attached is from a video, minus the extremely loud helicopter rotor sound.

Attachment 4

Page 12 *"The County estimates that the proposed rezoning from Single Family Residential (3-E-1) to Design Residential 20 would support 182 units."*

The combined Bailard acreage is 6.98 which at a maximum of 20 units per acre is a maximum of 139.6.

Page 13

*"The site is...not known to contain environmentally sensitive habitat."*

There are 56 tagged native oak trees on the property, only one of which appears on the existing developer's proposal.

Attachment 5

Monte Vista Park is a documented sensitive bird habitat per John Callender, President of Carpinteria Bird Watchers, with Red-tailed Hawk, Red-shouldered Hawk, American Kestrel, and Barn Owl. Birds have no boundaries. Bailard has not been documented as it is private property.

Bailard is also an archaeologically sensitive Chumash site as covered in the 1929 book Prehistoric Man of the Santa Barbara Coast which specifically mentions Bailard as site 5 on Page 46 as the site of an important Native settlement. Book in entirety here: <https://babel.hathitrust.org/cgi/pt?id=wu.89073061699&seq=1>

Attachments 6 and 7

Page 16 [Attachment 2..pdf](#)  
*"Policy 8-1 of the LUP.."*

As far as I can see, Bailard meets the criteria for an agricultural land use designation and as such should be protected for a source of food. The CA Dept of Conservation lists it as having Prime Farmland and Farmland of Statewide Importance. This property has a history of 155+ years as farmland. For last 15 years, it has been an organic farm that, until eviction of the farmer, under the USDA it was providing 7 tons of produce a week to SB Food Bank, local schools, and the community, featured in a KEYT segment in 2025. It has loamy rich soil, growing excellent produce.

Attachment 8 CA Dept of Conservation Letter

Attachment 9 Bailard Farm History

Attachment 10 KEYT 2025 Bailard Farm

Attachment 11 Soils statement

Attachment 12 Farmer statement

Further information:

*Regarding public water, sewer, and other essential urban infrastructure:*

The Bailard properties are on septic systems. The developer proposes to connect into the existing city infrastructure for Casitas Village which is on their privately owned Pandanus Street. After being threatened by the developer with seizure of their land by eminent domain for both water/sewer and ingress/egress, they have hired counsel.

*Regarding density, transit, commercial facilities, and parking:*

Bailard does not have a high-quality transit area, nor a major transit stop. It is not proximal (within 1 mile) to commercial facilities.

Attachment 13

Bailard Avenue is a heavily trafficked street bordered by Casitas Village 280 units and Villa Del Mar 230 units, totaling 510 units. Each unit is provided with 2 parking spaces within their development, totalling 1020 parking spaces. Despite this, resident cars are parked in all Bailard Avenue diagonal spaces, all curbs inside both developments, both sides of Via Real, and the Bluffs parking lot. Car counts from 6pm to 7pm on Sun Apr 21 and Mon Apr 22 found all available spaces cited above occupied, with a total of 567 cars bringing the overall total to 1,587 or an average of 3 cars per unit. The proposed development provides parking for only

@1.5 per unit. Any overflow would add to this situation on Bailard Avenue, Via Real and the Bluffs parking lot.

Attachment 14

Regarding safety:

During the Thomas Fire, only the residents of Villa Del Mar (230 units) on the eastern side of Bailard Avenue were evacuated which created panic and gridlock in the internal streets and on Bailard Consider adding Casitas Village (280 units) AND a Bailard development of @140 and it becomes truly life-threatening.

Summary: on Oct 25, 2021, the City of Carpinteria asked that the proposed Bailard multi-family development be abandoned, our 1st District Supervisor would not approve it, 2500 Carpinterians signed a petition to prevent the development, hundreds of community members wrote in or spoke at County hearings with concerns about the loss of our buffer zone, the destruction of our urban rural boundary, density and safety issues and the loss of a major food source in our community.

I request that the rezone of Bailard NOT be approved.

Susie Anderson





To whom it may concern,

We have been an integral supporter, purchaser, and contributor to the Certified Organic farm at 1101 Bailard Avenue since 2011.

We have done the Organic Certification on the property, and have worked with Jose to previously bring his produce to the Carpinteria School District and now are working with him to bring his produce to 5 districts in Ventura County: Rio, Oxnard Union, Oxnard School District, Ocean View, and Ojai Unified. These School Districts are in love with the quality and the taste of the produce that we bring them from this little farm.

The Bailard Avenue farm has a very special soil type. A mid-light sandy loam that is heavy enough to hold great nutrition and microbial life, but is light enough to grow a straight, long carrot. This soil type is highly coveted for vegetable growers, and is rarely available. Because of this soil type, and because of Jose's long term Organic stewardship of this property, the crops that are being produced at this site are bar none in taste, texture and nutrient value.

We hope that you have an opportunity to taste a crop from 1101 Bailard Avenue soon. If we can be of any assistance to you, please do not hesitate to reach out.

Sincerely,

Jason Lesh, Owner.

P.s. I may always be reached by telephone at (805)453-4966

# Locals Unite in Opposition to Proposed Housing Project on Bailard Avenue

Over 25 years ago, in 1995, a group of like-minded Carpinterians joined together when a local software company made plans to build a "campus" headquarters on agricultural land in Carpinteria Valley. It was quickly recognized that the proposal would breach the long-standing buffer zone separating urban and rural land use, and threatened to initiate a development sprawl that would be difficult to contain.

The group took on the name "Preserve Rural Carpinteria" and soon garnered the support of many Carpinterians from various walks of life. **Now, in light of the County's proposal of a high density, multi-story housing development adjacent to Monte Vista Park at the north end of Bailard Avenue, several original members, along with new supporters, have united in opposition to the proposed project.**

This united effort recognizes the community benefits that our valley has enjoyed under the protections of strong zoning policies, positive actions and oversight by the Carpinteria City Council and California Coastal Commission, all of which have been critical in preserving our small beach town feel, quality of life appeal and a very strong agricultural economy.

**We join our combined voices with those of the Carpinteria Valley Association and individual Carpinterians regarding concerns over project density, parking impacts, traffic congestion, Monte Vista Park safety issues and skyline view corridor impacts.** We add to these our recognition of the importance of a strong buffer zone between agricultural operations and urban land uses. In the words of the Santa Barbara County Subdivision Standards and Principles, "The intent of agricultural buffers is to minimize potential conflict originating from residential and other non-agricultural uses." The Board of Supervisors furthers this position in the county's Right to Farm Ordinance stating, "The Board of Supervisors finds that residential development adjacent to agricultural land and operations often leads to restrictions on farm operations to the detriment of the adjacent agricultural uses and economic viability of the county's agricultural industry as a whole."

Clearly the concerns and rationale 25 years ago are as applicable today, if not more so, as housing and development pressures collide with intelligent, forward-looking planning. At the same time, we appreciate more than ever our open space, locally grown produce, small town feel, and balanced rural/urban synergies.

Ang TIDDENS

Scott M. Dulles

Jim Bailard

W. H. H. H.

John W. H. H.

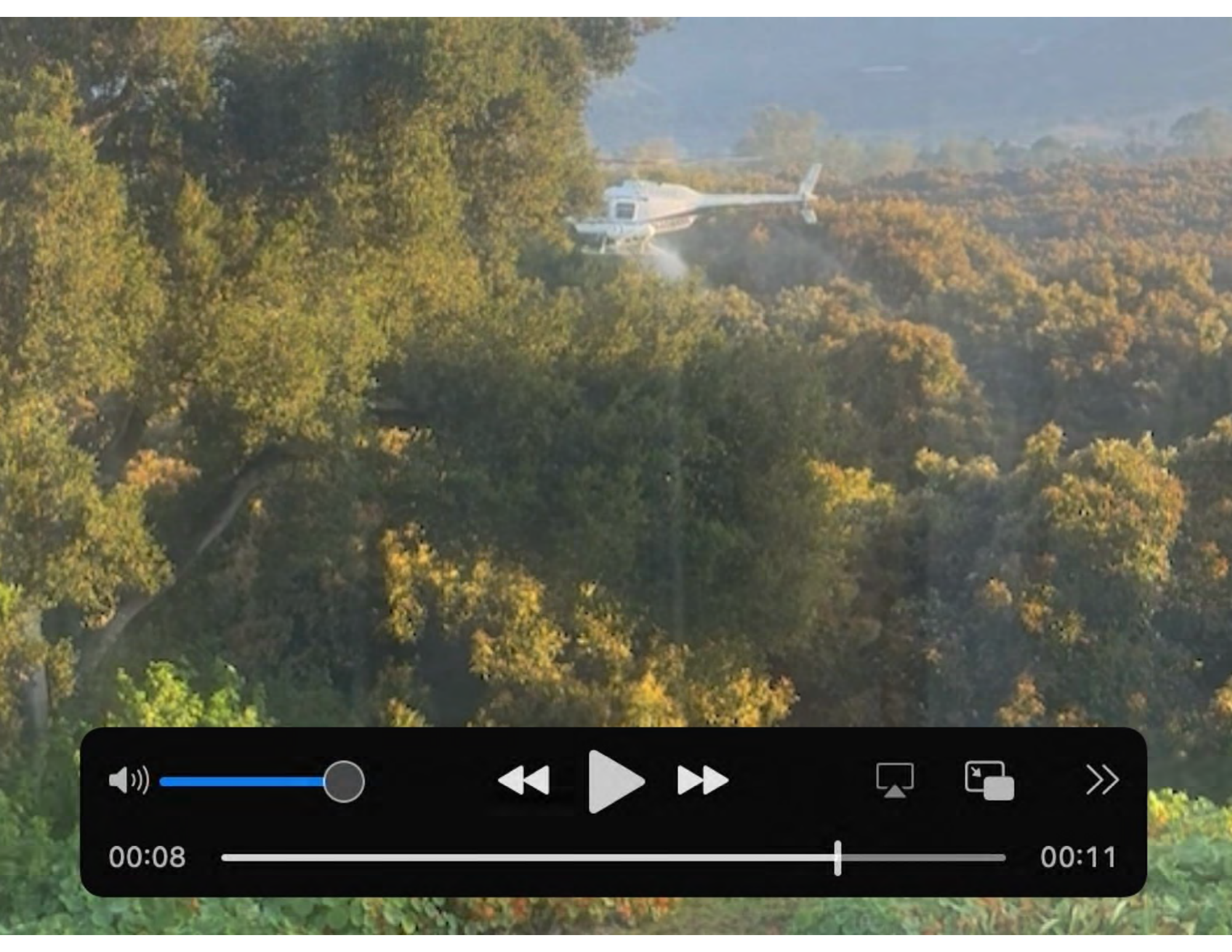
John W. H. H.

Reed Shale

Jonathan Brown

Andy Bailard

Carol W. Bailard



00:08



00:11



abrupt knoll. Examination of the soil of the adjacent grounds shows that the buildings are set in the midst of a former Indian site.

Near the residence are to be seen numbers of interesting artifacts that have been unearthed in the course of improving the grounds. These, to a large extent, belong to the first culture epoch. A few are of the Canaliño type, and the upper strata of the camp debris can be ascribed to no other source than Canaliño occupancy. Although I was not able to make a thorough investigation here, I venture a guess that the time during which the Oak Grove People occupied the site greatly exceeded that of the people who succeeded them.

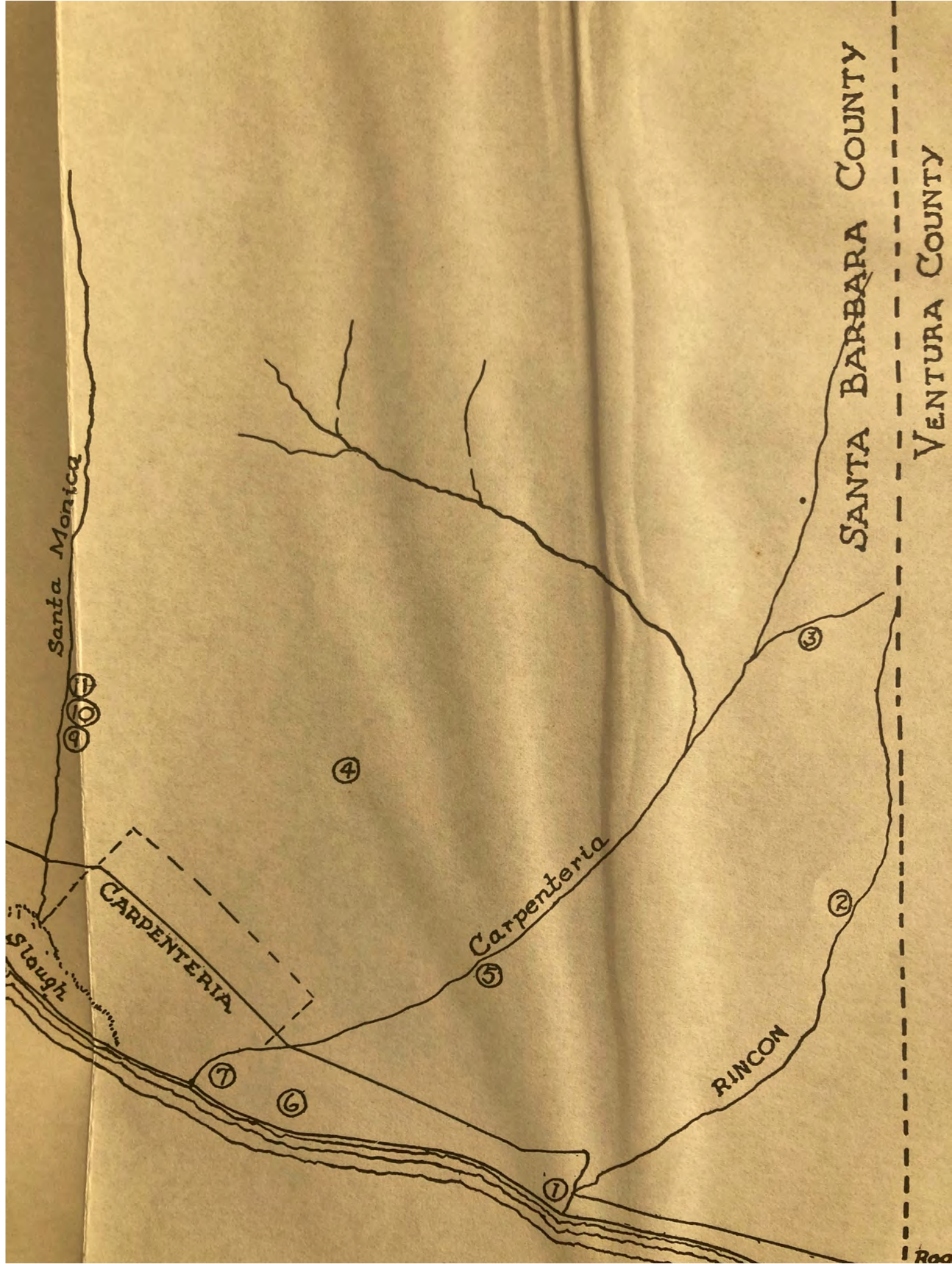
#### (5) BAILARD

About three-fourths of a mile to the northeast of the sites upon the Higgins Ranch, and nearly due east of the town of Carpenteria, crowning a prominent hill that rises abruptly from the southern side of Carpenteria Creek, about the modern ranch buildings that now cap the rise, are abundant evidences that an important Indian settlement once existed there. Bits of shell are scattered throughout the soil, and it is not unusual to find artifacts, when the soil is disturbed by cultivation. The proprietor of this holding informs me that at one spot he seldom fails to disturb ancient burials, whenever he breaks the surface of the soil. I made no thorough exploration of this place, but from the conditions surrounding it and the evidence offered by the artifacts seen and said to have been taken here, I should say that it had been occupied first by the Oak Grove People and then by the Canaliño.

#### (6) HIGGINS

Elsewhere I have attempted an outline description of the great site of "Mishopshnow," upon the Catlin tract, to the southeast of Carpenteria. Immediately to the east of the tract lie the Lucien Higgins holdings, on which are a diversity of remains of considerable interest.

Near the coast line and filling the space that lies between the Southern Pacific right-of-way and the sea cliff, is a dense bed of kitchen midden that reaches in places to a depth of four feet. This debris, in cross section, shows marked stratification;



Santa Monica

SANTA BARBARA COUNTY

VENTURA COUNTY

Slough

CARPENTERIA

Carpenteria

RINCON

①  
②  
③

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⑤

⑥

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⑩

Red

Borsh,  
Chris @DOC<Chris.Borsh@conservation.ca.gov  
>

to: "susie@ronandersonart.com"  
<susie@ronandersonart.com>  
date: Oct 28, 2024, 1:30 PM  
subject: RE: Prime Farmland in  
Carpinteria, California  
mailed-by: conservation.ca.gov  
signed-by: conservation.ca.gov

Hi Susie,

Thank you for reaching out to the Farmland Mapping and Monitoring Program. I believe there are a few items in your email and have broken these down to improve clarity:

#### **Brief description of Farmland Mapping and Monitoring Program process**

The Farmland Mapping and Monitoring Program conducts an aerial imagery interpretation for areas of California within the FMMP map survey area. The mapping process uses aerial imagery and does not consider parcel and zoning as a requirement for categorization. This mapping is conducted on a biannual schedule based on even years (2020, 2022, 2024, etc.) by categorizing land use to a minimum map unit of 10-acres and combining with the underlying soil units identified by the USDA's Natural Resources Conservation Service, which becomes the California Important Farmland for the biannual period. For farmland to be removed from Prime Farmland and Farmland of Statewide Importance, land must be observed fallow on a map cycle and continue to be fallow for an additional two map cycles (four years) before land will be removed from these categories.

Once the program completes a county's map cycle, the map is presented to the respective county for a 90-day review and comment period. After the comment period, the program releases the Important Farmland map for the biannual period on our website – which can be located in the California Important Farmland Finder using our web application at: <https://maps.conservation.ca.gov/dlrp/ciff/>

More detailed information on how our program operates can be found in our PDF of the Farmland Mapping and Monitoring overview presentation with speaker notes – available at: <https://www.conservation.ca.gov/dlrp/fmmp/Pages/Farmland-Mapping-and-Monitoring-Program-Virtual-Sessions.aspx>

#### **Santa Barbara Important Farmland**

The latest Santa Barbara Important Farmland map cycle to be completed is for 2020. The 2020 Santa Barbara draft map was sent to the county on December 12, 2023 – with a 90-day review period ending on March 11, 2024. **No requests for**

changes were received by the county, and the Santa Barbara 2020 Important Farmland data was made available on our [website](#) on March 15, 2024.

The program is currently working on the 2022 map cycle for the State. It is expected Santa Barbara's 2022 Important Farmland will be available in 18-24 months. Based on the 2020 Santa Barbara Important Farmland data provided, the land shown covering those parcels is categorized as irrigated farmland in the 2020 map cycle. When the irrigated farmland land use is combined with the underlying soils, this land is identified as Prime Farmland and Farmland of Statewide Importance.

### **Zoning and Planning of land**

The classification of zoning and project approval would be outside of the scope of the Farmland Mapping and Monitoring Program. Zoning and Planning would be local government functions of the County of Santa Barbara and with the City of Carpinteria and would need to be directed to their respective zoning and planning departments, and the county board of supervisors.

**Chris Borsh**

Research Data Analyst II | Farmland Mapping and  
Monitoring Program

California Department of Conservation

715 P Street, MS 1904, Sacramento, CA 95814

T: (916) 907-2903

E: [chris.borsh@conservatio](mailto:chris.borsh@conservatio)

Email from Andrew Bailard  
To Susie Anderson

Monday, February 20, 2023

Hi Susie,

The Bailard Family settled in Carpinteria in 1868. At that time my Great Grandfather (also Andrew Bailard) bought 500 acres of land in Carpinteria for farming. It was broken up into various parcels over many years. However, the ranch that we own is part of the original 500 acres. We have been growing avocados since the 1950's and lemons from the 1930's to the 1950's. We have 47 acres that is located right behind the Bailard property being proposed for development. My children also have an avocado ranch (18 acres) that is close to the same proposed development. So our family has been farming in these same locations for about 155 years. The small acreage being proposed for development is part of the original 500 acres and has been farmed for a long time and produced local organic products.

The Brad Hubbs family is actually living in the original Bailard Family house that my Great Grandfather built in 1868 on the land he purchased. They had 10 children so that they could have plenty of help with farming 500 acres at that time. My Grandfather, my father and I were all born in Carpinteria and have all been involved in farming here. We are obviously opposed to the apartment development on the Bailard parcel in question. As I wrote to the County this project would bring in too many people and too many cars to an area that can't handle that.

I hope this background information is helpful to you  
Andy

<https://keyt.com/news/agriculture/2025/01/28/struggling-farmer-finds-support-through-enhanced-food-system-in-santa-barbara-county/>

Now, the farmer is finding support through an enhanced food system thanks to a partnership with the USDA and the Foodbank of Santa Barbara County.

The program gives small local farmers like Alcantar a place to sell their produce to dependable buyers.

"One of the things so special about this project ... is getting the best quality ... and the produce that Jose grows is certified organic," said owner Katie Lesh of Farm Cart Organics.

On any given week, the food bank receives an average of 7,000 pounds of food from the (Baillard) farm.

"It's going great ... our neighbors that get the produce are able to get organic produce that's pretty much farm a table ... and it's been a really great program ... to see it go through our community," said director of operations Jesus Lopez of the Foodbank of Santa Barbara County.

When we get the food from the farm, we get it in our grocery bags that go out to our distributions ... and distribute to all our programs ... all the way from a regular mobile food pantry to our healthy school pantries," said Lopez.



To whom it may concern,

We have been an integral supporter, purchaser, and contributor to the Certified Organic farm at 1101 Bailard Avenue since 2011.

We have done the Organic Certification on the property, and have worked with Jose to previously bring his produce to the Carpinteria School District and now are working with him to bring his produce to 5 districts in Ventura County: Rio, Oxnard Union, Oxnard School District, Ocean View, and Ojai Unified. These School Districts are in love with the quality and the taste of the produce that we bring them from this little farm.

The Bailard Avenue farm has a very special soil type. A mid-light sandy loam that is heavy enough to hold great nutrition and microbial life, but is light enough to grow a straight, long carrot. This soil type is highly coveted for vegetable growers, and is rarely available. Because of this soil type, and because of Jose's long term Organic stewardship of this property, the crops that are being produced at this site are bar none in taste, texture and nutrient value.

We hope that you have an opportunity to taste a crop from 1101 Bailard Avenue soon. If we can be of any assistance to you, please do not hesitate to reach out.

Sincerely,

Jason Lesh, Owner.

P.s. I may always be reached by telephone at (805)453-4966

2022 Feb 20 Interview by Susie Anderson of Jose Alcantar, the farmer on Bailard Ave

Jose began farming in his late teens, working for others in Santa Barbara County. In 2010 he had the opportunity to get his own farm and go into business for himself by leasing 5 acres of land owned by the Carpinteria Unified School District at the north end of Bailard Avenue. The land, which had lain fallow for several years, had been farmed for over 155 years as part of the Bailard Ranch and is comprised of both Farmland of Statewide Importance and Prime Farmland. Jose says the soil is magical. Everything grows and the strawberries grown there are exceptionally sweet - he's not sure why but it might be the combination of Carpinteria's unique climate by the ocean and the 100+ years of farming a variety of crops.

In 2010 he began his direct relationship with CUSD, dedicating the 5 acres to organic food for the children of Carpinteria. Soon thereafter he added schools in Santa Barbara. During COVID this was suspended, but things are picking up and he has been asked to begin delivering organic food to Ojai's students as well.

Over the years he has expanded his acreage by leasing additional sites in SB County. He and his family now do 11 Farmers' Markets a week and provide fresh organic produce to Carpinteria's Farm Cart, The Good Plow, Zookers, and Food Liaison. In Santa Barbara they contribute to the CSA (community supported agriculture) boxes for Plow to Porch and Ah Juice Restaurant.

He likes the idea of expanding the activity at his Bailard farm (his favorite property) to include educational opportunities for children to learn more about the business of farming. He is concerned that they are not being given enough opportunity to experience the joy of working the land and growing the food that we eat and seeing that it is a viable and important life's work. Standing by his truck in the twilight after another successful Sunday Farmers' Market he says with a smile, "We need more farmers!"

## ATTACHMENT 13 Bailard Transit and Amenities

### WITHIN 1/2 MILE OF HIGH-QUALITY TRANSIT AREA OR MAJOR TRANSIT STOP

(III) “Major transit stop” has the same meaning as defined in Section 21064.3 of the Public Resources Code: “Major transit stop” means a site containing any of the following: (a) An existing rail or bus rapid transit station. (b) A ferry terminal served by either a bus or rail transit service. SB Transit makes a stop on Via Real every 30 min. It is not a major transit stop by their definition. <https://sbmtd.gov/routes/route-20/>

### PROXIMAL TO 6 OR MORE AMENITIES (Proximal defined as within 1 mile)

[https://www.mapdevelopers.com/distance\\_from\\_to.php](https://www.mapdevelopers.com/distance_from_to.php)

1103 Bailard to the nearest amenity:

(Ia) A supermarket or grocery store. Albertsons 1.46 miles

(Ib) A public park. Adjacent to Monte Vista Park

(Ic) A community center. Carp County Health 1.71 Womens Club 1.69

(Id) A pharmacy or drugstore. CVS 1.46

(Ie) A medical clinic or hospital. Sansum Urgent Care 2.02

(If) A public library. 1.69

(Ig) A school that maintains a kindergarten or any of grades 1 to 12, inclusive. Carp Middle 1.74 Canalino 1.95 Carp High 2.47 Aliso 2.97

# RED TAIL PROPOSAL

NOTE: RED ZONES  
ON STREETS NOT SHOWN  
1 CAR PARKED IN RED ZONE  
AND TICKETED ON  
HICKORY



|                 |                  |     |
|-----------------|------------------|-----|
| CASITAS VILLAGE | BAILARD DIAGONAL | 101 |
|                 | VIA REAL WEST    | 75  |
|                 | POPLAR           | 15  |
|                 | HICKORY          | 81  |
|                 | BIRCH            | 82  |
| VILLA DEL MAR   | PANDANUS         | 16  |
|                 | JACARANDA        | 59  |
|                 | PALMETTO         | 78  |
|                 | VIA REAL EAST    | 60  |

**TOTAL**  
**567**  
**OVERFLOW CARS**

EACH NIGHT APRIL 21 (SUN) AND 22 (MON) 6PM - 7PM

VISTA DE  
SANTA  
BARBARA

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**Public Comment on November 2025 Agenda Item Thursday 11a - County of Santa Barbara LCP Amendment No. LCP-4-STB-24-0028-1-Part B (Housing Element Update/Rezoning).**

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**From** Mark Marius <mariusteam@mac.com>

**Date** Fri 10/31/2025 4:51 PM

**To** SouthCentralCoast@Coastal <SouthCentralCoast@coastal.ca.gov>

[You don't often get email from mariusteam@mac.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Greetings ,

I am not in favor of the proposed housing element update and rezone for the Bailard property butting up to Carpinteria City lines. There are better suited parcels equipped to handle the necessary housing our community needs. We do not need to convert agricultural lands for this housing crisis. The proposal will have a detrimental density and traffic impact.

Thank you for your consideration,

Mark A. Marius

Carpinteria Resident

Sent from my iPad

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**FW: November 2025 County of Santa Barbara LCP Amendment No. LCP-4-STB-24-0028-1-Part B (Housing Element Update/Rezones). County of Santa Barbara LCP Amendment No. LCP-4-STB-24-0028-1-Part B (Housing Element Update/Rezones).**

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**From** SouthCentralCoast@Coastal <SouthCentralCoast@coastal.ca.gov>

**Date** Fri 10/24/2025 11:07 AM

**To** Gonzalez, Denise@Coastal <Denise.Gonzalez@coastal.ca.gov>

 1 attachment (186 KB)

Th11a-11-2025-report.pdf;

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**From:** Christian Alonso <calonso327@gmail.com>

**Sent:** Friday, October 24, 2025 11:03 AM

**To:** SouthCentralCoast@Coastal <SouthCentralCoast@coastal.ca.gov>

**Subject:** November 2025 County of Santa Barbara LCP Amendment No. LCP-4-STB-24-0028-1-Part B (Housing Element Update/Rezones). County of Santa Barbara LCP Amendment No. LCP-4-STB-24-0028-1-Part B (Housing Element Update/Rezones).

You don't often get email from [calonso327@gmail.com](mailto:calonso327@gmail.com). [Learn why this is important](#)

Commissioners,

I am writing to express my full support for the attached agenda item concerning the Housing Authority of the County of Santa Barbara's proposed Bailard site project in the unincorporated Carpinteria Valley.

As a member of the HASBARCO Board, I am aware of the housing challenges impacting our essential workforce. The current reality is that the unincorporated Carpinteria Valley has a clear need for affordable and workforce-oriented rental housing. This shortage has significant consequences, often forcing agricultural workers and others into overcrowded living conditions or requiring them to endure lengthy commutes that increase traffic congestion on the 101 freeway.

The Bailard site project represents an important step toward addressing these issues. By developing this site, we are directly providing safe, stable, and conveniently located homes for the people who are essential to our local economy and community.

It is essential that we continue to prioritize and support the development of affordable housing projects in the Carpinteria Valley. I urge the Coastal Commission to approve this item and move this vital project forward for the benefit of all Santa Barbara County residents.

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**Public Comment on November 2025 Agenda Item Thursday 11a - County of Santa Barbara LCP Amendment No. LCP-4-STB-24-0028-1-Part B (Housing Element Update/Rezoning).**

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**From** Marina Henning <beachscape805@gmail.com>

**Date** Fri 10/31/2025 12:17 PM

**To** SouthCentralCoast@Coastal <SouthCentralCoast@coastal.ca.gov>

You don't often get email from beachscape805@gmail.com. [Learn why this is important](#)

Hello,

We strongly object to re-zoning of any agricultural land in Carpinteria Coastal Zone, which will lead to unsustainable increase of population and housing density for our small coastal community.

Re zoning remaining agricultural land will inevitably endanger already vulnerable species of birds, reptiles and beneficial insects that are barely surviving. They need to have at least some habitat and are already struggling. Any time this type of development happens we lose endemic species. This fact is well documented and Coastal commission needs to take into account many studies that show how harmful the loss of natural habitat is for everyone and everything.

Rezoning sites that are outside the Urban/Rural Boundary (Van Wingerden 1, Van Wingerden 2, and Bailard) to be high-density residential is poor planning policy and should be denied.

Moreover, construction in these areas could create catastrophic consequences for flood control and mitigation as well as increase fire danger. Proposed high density apartments are a new fire risk and will be regarded as such by insurance companies. This is clearly a for profit venture that will not create enough affordable housing (which as everyone knows is just a convenient loophole for getting building permits) but instead will force current long term Carpinteria residents out of their homes as they will not be able to afford fire insurance or even obtain it altogether. The situation with insurance is catastrophic and creating a new factor for increasing fire risk will only get it worse.

The importance of a stable Urban/Rural Boundary and the protections of the California Coastal Act in the Coastal Zone are fundamental to good planning and have been critical in protecting the Carpinteria Valley for decades. This legacy of sound planning must be continued.

Please do not make this mistake for the sake of our beautiful area and the entire Central Coast.

Sincerely

Marina Henning

Resident of Carpinteria for the last 25 years

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**Public Comment on November 2025 Agenda Item Thursday 11a - County of Santa Barbara LCP Amendment No. LCP-4-STB-24-0028-1-Part B (Housing Element Update/Rezones).**

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**From** Lorraine McIntire <raineytax@gmail.com>

**Date** Fri 10/31/2025 10:47 AM

**To** SouthCentralCoast@Coastal <SouthCentralCoast@coastal.ca.gov>

**Cc** Lorraine McIntire <raineytax@gmail.com>

Dear California Coastal Commission,

I am a resident of the City Of Carpinteria. I live in the Villa Del Mar condos, next to the proposed Bailard Avenue parcel which you support rezoning from agriculture "buffer" to high-density housing.

I oppose CCC's recommendation to rezone this parcel. There are many valid reasons why this parcel is inappropriate for high density housing.

First of all, it conflicts with your own policies and plans meant to preserve coastal agricultural land. Your plans were meticulously crafted over years of debate and exist for a reason, why deviate unduly and hastily now just to meet a very broad and impersonal state housing mandate that will have permanent consequences ?

Secondly, the development lacks any planned amenities to support the amount of proposed density, and puts undue burden and strain on existing city amenities, which in turn puts undue burden and stress on neighborhoods, which impact ALL city residents, not just neighboring communities.

Lastly, there is no plan or funding source on the table to add infrastructure, roadways, adequate parking, or additional city resources to support these densely stuffed communities. Not to mention the lack of fire/flood insurance providers writing policies in California.

Why not spend effort strategically sourcing ideal locations that DO NOT conflict with CCC policy mandates and mission? Seek out partners to develop in those areas, rather than passively await a developer's proposal to force a development that requires you to deviate from your own mandate and one that doesn't at all fit with the community on any level?

I oppose the rezone. Please vote NO.

Best,

Lorraine McIntire, CPA  
1062 Palmetto Way #A

Carpinteria, CA 93013  
408-859-9320

Sent from my iPhone

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**FW: Public Comment on November 2025 Agenda Item Thursday 11a - County of Santa Barbara LCP Amendment No. LCP-4-STB-24-0028-1-Part B (Housing Element Update/Rezones).**

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**From** SouthCentralCoast@Coastal <SouthCentralCoast@coastal.ca.gov>

**Date** Fri 10/31/2025 10:03 AM

**To** Gonzalez, Denise@Coastal <Denise.Gonzalez@coastal.ca.gov>

-----Original Message-----

**From:** Lily Broberg Strong <lily.broberg@gmail.com>

**Sent:** Friday, October 31, 2025 10:01 AM

**To:** SouthCentralCoast@Coastal <SouthCentralCoast@coastal.ca.gov>

**Subject:** Public Comment on November 2025 Agenda Item Thursday 11a - County of Santa Barbara LCP Amendment No. LCP-4-STB-24-0028-1-Part B (Housing Element Update/Rezones).

[You don't often get email from lily.broberg@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

I oppose the re-zone of Carpinteria to allow high density residential development.

Where my residence is this will be dangerous related to fire evacuation. There is already a concerning amount of people and cars to get out through a small corridor. Please don't allow this project to make it worse, fire is a very real concern and we don't want to put lives at risk.

Thank you,  
Lily Strong  
Birch St  
Carpinteria

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**Public Comment on November 2025 Agenda Item Thursday 11a - County of Santa Barbara LCP Amendment No. LCP-4-STB-24-0028-1-Part B (Housing Element Update/Rezoning).**

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**From** jennifer.alter@yahoo.com <jennifer.alter@yahoo.com>

**Date** Fri 10/31/2025 12:19 PM

**To** SouthCentralCoast@Coastal <SouthCentralCoast@coastal.ca.gov>

[You don't often get email from jennifer.alter@yahoo.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

High Density housing should be denied at this location, as this property should remain AG/Farmland or Equestrian Use.

Thank you,  
Jennifer Alter

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**Public Comment on November 2025 Agenda Item Thursday 11a - County of Santa Barbara LCP Amendment No. LCP-4-STB-24-0028-1-Part B (Housing Element Update/Rezoning).**

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From Anna Carrillo <annacarp@cox.net>

Date Fri 10/31/2025 11:59 AM

To SouthCentralCoast@Coastal <SouthCentralCoast@coastal.ca.gov>

I am writing to urge you **not to rezone these three parcels in the Carpinteria Valley.**

These properties in the Coastal Zone are currently outside the urban/rural boundary which was designated many years ago to safeguard both agriculture and the residents living near farming operations (used to be avocados, now cannabis). **The whole purpose of the urban/rural line separation was to create a buffer between agricultural parcels and residences. It is important to maintain this buffer because farmers have the Right to Farm and removing this buffer will cause many complaints between farmers and the residences** as we have currently seen with cannabis.

**The County's Coastal Land Use Plan Section 3.8.2 describes "the need for clearly defined urban/rural boundaries is especially apparent on the South Coast, where prime coastal agriculture has given way to urban expansion" and this boundary must not be changed.** If it were to be changed for this RHNA cycle, what's to prevent this urban/rural boundary to be changed in the next RHNA cycle. The urban/rural line is not a jigsaw that can be moved willy nilly as a developer sees fit. This urban/rural boundary has been stable and was created to prevent development that is inappropriate because of the conflicts between agricultural operations and residences.

The problem with upzoning the Bailard property is that the three story building planned there has only one access in and out of the property and a lack of sufficient parking. Parking is already a problem for the current residents living next to this proposed project and those visiting Monte Vista Park. This project will be using city streets and recreation areas without paying for any of the infrastructure they're utilizing as the tax monies will go to the county, not the city. At three stories high this project will overshadow the neighboring residences and would never have been permitted according to Carpinteria's planning rules. Currently the zoning there is a perfect type of buffer between the more intensive agriculture nearby (avocados and cannabis) and the nearby residences.

Both of the Van Wingerden parcels are zoned agriculture and are on designated prime soil parcels. Van Wingerden 1 (15.18 acres) has an address on Via Real though it's not actually on Via Real and is quite a distance from the downtown area so getting to and from downtown would require many cars trips for the proposed 455 units. This property is in active open field agricultural production (avocados). Van Wingerden 2 (9.68 acres) has developed greenhouses facilities with proposed 290 units.

Changing the urban/rural boundary for Van Wingerden 1 would open the door to a new proposed development on ag land on Cravens Lane which then would have cannabis on 2 sides. Changing the urban/rural boundary for Van Wingerden 2 leaves a thin parcel of ag land used by a contiguous 10 acre cannabis grower. Both of these possible rezones show the problem with thinking of the urban/rural boundary as a movable line that then can be changed with a new proposal.

The city is already committed to providing 901 new housing units and rezoning these three parcels would add another 635 to 883 more housing units to the very small City of Carpinteria. This many new units will impact the city and the city's infrastructure without any accompanying taxes to help maintain and/or improve the current infrastructure. The county's winding country roads are very narrow and Foothill Rd. (Van Wingerden #2) does not even have adequate space for bike lanes which are used constantly. Currently the traffic on all 3 of the streets involved is notorious, just think how it would be with more than 600-800 more residents that the county wants the city of Carpinteria to provide for.

**Please don't approve this amendment to rezone these three parcels that would then change the stable urban/rural boundary. This urban/rural boundary exists primarily to protect agriculture, prevent urban sprawl, and provide for good long-term planning. The City of Carpinteria does not want this rezoning, yet they will have to pay and reap the consequences of your decision if you rezone these parcels.**

Thank you,  
Anna Carrillo

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**Public Comment on November 2025 Agenda Item Thursday 11a - County of Santa Barbara LCP Amendment No. LCP-4-STB-24-0028-1-Part B (Housing Element Update/Rezoning).**

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**From** Patty grifglo <capecod927@hotmail.com>

**Date** Fri 10/31/2025 1:09 PM

**To** SouthCentralCoast@Coastal <SouthCentralCoast@coastal.ca.gov>

**Cc** sasha477m@gmail.com <sasha477m@gmail.com>

You don't often get email from capecod927@hotmail.com. [Learn why this is important](#)

Dear Commissioners,

**We are writing to strongly urge you to DECLINE Santa Barbara County's request to rezone agricultural land to high-density residential.** The proposed scale of the three projects defies the fundamentals of sound urban planning and are inconsistent with the Coastal Act's protection goals.

We support Santa Barbara County's efforts to identify infill development opportunities including underutilized commercial, office and public properties in the South County urban and suburban areas. The County should continue to prioritize those areas rather than relying on rezoning agricultural land for development opportunities that are outside of the City – areas that will be most impacted and will have the least say.

As 27-year residents of Carpinteria, we can attest to the efforts of the City of Carpinteria in promoting housing for residents with a wide spectrum of incomes. We request that Coastal Commission acknowledge the concerns raised by the City and its residents with the current rezoning proposal and work with the City and County to find more appropriate solutions that balance the need for housing with preserving the character of our coastal community.

Thank you for your consideration of this important matter.

Sincerely,

Alexander and Patricia Globa  
Carpinteria, CA

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**Fw: Public Comment on Nov 2025 Agenda Item Th11a – County of SB LCP Amendment**

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**From** Moore, Elizabeth@Coastal <elizabeth.moore@coastal.ca.gov>

**Date** Thu 10/30/2025 2:12 PM

**To** Gonzalez, Denise@Coastal <Denise.Gonzalez@coastal.ca.gov>

**Cc** SouthCentralCoast@Coastal <SouthCentralCoast@coastal.ca.gov>

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**From:** Teda Pilcher <tedapilcher@yahoo.com>

**Sent:** Thursday, October 30, 2025 1:41 PM

**To:** ExecutiveStaff@Coastal <ExecutiveStaff@coastal.ca.gov>

**Subject:** Public Comment on Nov 2025 Agenda Item Th11a – County of SB LCP Amendment

You don't often get email from tedapilcher@yahoo.com. [Learn why this is important](#)

Rezoning sites that are outside the Urban/Rural Boundary (Van Wingerden 1, Van Wingerden 2, and Bailard) to be high-density residential is poor planning policy and should be denied. The importance of a stable Urban/Rural Boundary and the protections of the California Coastal Act in the Coastal Zone are fundamental to good planning and have been critical in protecting the Carpinteria Valley for decades. This legacy of sound planning must be continued.

Teda Pilcher  
1475 Namouna St  
Carpinteria, CA 93013

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**Fw: Public Comment on November 2025 Agenda Item Thursday 11a - County of Santa Barbara LCP Amendment No. LCP-4-STB-24-0028-1-Part B (Housing Element Update/Rezones).**

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**From** SouthCentralCoast@Coastal <SouthCentralCoast@coastal.ca.gov>

**Date** Thu 10/30/2025 5:33 PM

**To** Gonzalez, Denise@Coastal <Denise.Gonzalez@coastal.ca.gov>

---

**From:** Ron Anderson <ron@ronandersonart.com>

**Sent:** Thursday, October 30, 2025 5:07 PM

**To:** SouthCentralCoast@Coastal <SouthCentralCoast@coastal.ca.gov>

**Subject:** Public Comment on November 2025 Agenda Item Thursday 11a - County of Santa Barbara LCP Amendment No. LCP-4-STB-24-0028-1-Part B (Housing Element Update/Rezones).

[You don't often get email from ron@ronandersonart.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

I do not support the rezone proposals for the proposed developments in the Carpinteria valley. We need to protect our farm land and buffer zones. The rezone proposal for Baillard development is especially wrong. The area is already dense and further development will create public hazards with lack of parking and emergency escape routes. The city of Carpinteria does not support this development and the rezone proposal should be denied.

Thank you,

Ron Anderson

Carpinteria resident

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**Fw: Public Comment on Nov 2025 Agenda Item Th11a – County of SB LCP Amendment**

---

**From** Moore, Elizabeth@Coastal <elizabeth.moore@coastal.ca.gov>

**Date** Thu 10/30/2025 2:13 PM

**To** Gonzalez, Denise@Coastal <Denise.Gonzalez@coastal.ca.gov>

**Cc** SouthCentralCoast@Coastal <SouthCentralCoast@coastal.ca.gov>

Fyi -

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**From:** Michael Sipiora <dr.sipiora@rocketmail.com>

**Sent:** Thursday, October 30, 2025 1:29 PM

**To:** ExecutiveStaff@Coastal <ExecutiveStaff@coastal.ca.gov>

**Subject:** Public Comment on Nov 2025 Agenda Item Th11a – County of SB LCP Amendment

You don't often get email from dr.sipiora@rocketmail.com. [Learn why this is important](#)

Rezoning sites that are outside the Urban/Rural Boundary (Van Wingerden 1, Van Wingerden 2, and Bailard) to be high-density residential is poor planning policy and should be denied. The importance of a stable Urban/Rural Boundary and the protections of the California Coastal Act in the Coastal Zone are fundamental to good planning and have been critical in protecting the Carpinteria Valley for decades. This legacy of sound planning must be continued.

Best,  
Michael P. Sipiora, Ph.D.  
1475 Namouna St.  
Carpinteria, CA 93013

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**FW: Public Comment on November 2025 Agenda Item Thursday 11a - County of Santa Barbara LCP Amendment No. LCP-4-STB-24-0028-1-Part B (Housing Element Update/Rezones).**

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**From** SouthCentralCoast@Coastal <SouthCentralCoast@coastal.ca.gov>

**Date** Fri 10/31/2025 9:54 AM

**To** Liddell, Tyler@Coastal <tyler.liddell@coastal.ca.gov>; Gonzalez, Denise@Coastal <Denise.Gonzalez@coastal.ca.gov>

-----Original Message-----

**From:** Mary Anne Silvestri <qihai@cox.net>

**Sent:** Thursday, October 30, 2025 6:14 PM

**To:** SouthCentralCoast@Coastal <SouthCentralCoast@coastal.ca.gov>

**Subject:** Public Comment on November 2025 Agenda Item Thursday 11a - County of Santa Barbara LCP Amendment No. LCP-4-STB-24-0028-1-Part B (Housing Element Update/Rezones).

[You don't often get email from qihai@cox.net. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

To whom it may concern:

I don't support the proposed Carpinteria rezones. I am very concerned about water. In Carpinteria we have not yet recovered the groundwater lost during the big drought. Adding almost 600 residences for how many people is not in the best interest of the community. Even if they were low cost housing - which they are not - the water usage is above the limits we have for our small community.

Thank you for listening.

Mary Anne Silvestri

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**FW: Public Comment on November 2025 Agenda Item Thursday 11a - County of Santa Barbara LCP Amendment No. LCP-4-STB-24-0028-1-Part B (Housing Element Update/Rezones).**

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**From** SouthCentralCoast@Coastal <SouthCentralCoast@coastal.ca.gov>

**Date** Fri 10/31/2025 9:58 AM

**To** Gonzalez, Denise@Coastal <Denise.Gonzalez@coastal.ca.gov>

---

**From:** Martha <mh\_oboyle@yahoo.com>

**Sent:** Thursday, October 30, 2025 8:54 PM

**To:** SouthCentralCoast@Coastal <SouthCentralCoast@coastal.ca.gov>

**Subject:** Public Comment on November 2025 Agenda Item Thursday 11a - County of Santa Barbara LCP Amendment No. LCP-4-STB-24-0028-1-Part B (Housing Element Update/Rezones).

You don't often get email from [mh\\_oboyle@yahoo.com](mailto:mh_oboyle@yahoo.com). [Learn why this is important](#)

Dear Coastal Commission,

My name is Martha O'Boyle. My husband and I live at 5930 Birch St. Unit 4, in Carpinteria adjacent the Bailard Property. The Bailard Property Should not be rezoned. It should remain zoned for 2 homes on the 7 acres of current farmland as the important buffer zone between our city and large agriculture. There should not be high-density development on this land. I oppose the this rezone that would allow between 140-210 homes on 7 acres adjacent to the most densely populated area of our city. I would violate our good city planning, causing greatly increased traffic in an already overloaded area with disintegrating roads, and pose a threat to our safety in the event of an emergency. There is only one road, Bailard Ave that provides much of the access out of the two adjacent condo properties and park. Bailard Ave. would also be the sole means of access to any new development on the Bailard property and in the event of an emergency would create a pinch point for all in the area. Further, parking is severely limited in this area as this is the lowest rent area in the city so many low income residents overcrowd the existing high-density housing with often multiple families in a small two bedroom unit, many with mostly adults with their own vehicles and often additional work vehicles. I see as many as 6-7 vehicles, or more, associated with a single 2-bedroom unit with designated parking for 2 cars. The condo complexes and surrounding streets are overcrowded with cars. The parking lot at the neighborhood park is full all night long in violation of the local ordinance. Any additional high-density housing would just further exacerbate an already absolutely horrible situation.

I respectfully by urgently request that you fully consider the consequences of rezoning from the perspective the neighboring properties.

Thank you for your time.

Martha and Mark O'Boyle

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**Fw: Public Comment on Nov 2025 Agenda Item Th11a - County of SB LCP Amendment**

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**From** Moore, Elizabeth@Coastal <elizabeth.moore@coastal.ca.gov>

**Date** Thu 10/30/2025 2:10 PM

**To** Gonzalez, Denise@Coastal <Denise.Gonzalez@coastal.ca.gov>

**Cc** SouthCentralCoast@Coastal <SouthCentralCoast@coastal.ca.gov>

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**From:** Katrina Barraza <katmbarraza@gmail.com>

**Sent:** Thursday, October 30, 2025 1:55 PM

**To:** ExecutiveStaff@Coastal <ExecutiveStaff@coastal.ca.gov>

**Subject:** Public Comment on Nov 2025 Agenda Item Th11a - County of SB LCP Amendment

You don't often get email from katmbarraza@gmail.com. [Learn why this is important](#)

Reasoning sites that are outside the Urban/Rural Boundary to be high-density residential is poor planning policy and should be denied. The importance of a stable Urban/Rural Boundary and the protections of the California Coastal Act in the Coastal Zone are fundamental to good planning and have been critical in protecting the Carpintería Valley for decades. This legacy of sound planning must be continued.

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**FW: Public Comment on November 2025 Agenda Item Thursday 11a - County of Santa Barbara LCP Amendment No. LCP-4-STB-24-0028-1-Part B (Housing Element Update/Rezones).**

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**From** SouthCentralCoast@Coastal <SouthCentralCoast@coastal.ca.gov>

**Date** Thu 10/30/2025 1:34 PM

**To** Gonzalez, Denise@Coastal <Denise.Gonzalez@coastal.ca.gov>

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**From:** John Tilton <jtilton33@gmail.com>

**Sent:** Thursday, October 30, 2025 1:25 PM

**To:** SouthCentralCoast@Coastal <SouthCentralCoast@coastal.ca.gov>

**Subject:** Public Comment on November 2025 Agenda Item Thursday 11a - County of Santa Barbara LCP Amendment No. LCP-4-STB-24-0028-1-Part B (Housing Element Update/Rezones).

You don't often get email from [jtilton33@gmail.com](mailto:jtilton33@gmail.com). [Learn why this is important](#)

Hello,

I am writing with regard to the County of Santa Barbara request to rezone three properties that stand just outside the edge of the City of Carpinteria city limit.

As a long-time resident of Carpinteria, and living very close to one of the properties in question (the "Bailard" property), rezoning these sites would be a major blow to the character of Carpinteria and the rural nature of those properties and their surroundings.

My understanding is that the County has enough sites to meet the State RHNA requirements without indulging in violating the Urban/Rural boundary that is in place at these properties. All of these properties fall within the "Rural" designation.

The existing Boundary has served the County and City well in preventing urban sprawl and maintaining the character of traditional agricultural areas.

It would pave over an existing organic farm on land which has been identified as Farmland of State Importance and Prime Farmland.

Thank you for your time and consideration.

John Tilton

6008 Jacaranda Way #H

Carpinteria, CA 93013

[jtilton33@gmail.com](mailto:jtilton33@gmail.com)

To the Executive Staff of the California Coastal Commission:

I have lived adjacent to the Bailard property for over a decade. Our neighborhood is already one of the highest density communities within Carpinteria. Rezoning this particular parcel is poor planning policy and should be denied. This neighborhood has limited exit routes due to the agricultural fields behind us. The volume of cars in and out of the area on a normal day is challenging, and during our last disaster, the Thomas Fire, the gridlock that occurred during evacuation orders was concerning. This proposal would exacerbate this issue to the extreme, with the addition of up to 182 units in our neighborhood with multiple cars per household.

The Bailard property in its current form serves multiple purposes for the community. It is an important buffer between the agricultural fields and city neighborhoods. During aerial spraying in the avocado orchards behind the property, the residents of the three houses on the property were notified each time to either shelter in place or leave for the duration of the spraying. The proposed rezoning would now put a potential 182 families in that same situation. Placing urban communities in the direct path of agricultural uses is poor planning policy. The buffer is necessary.

This property was also playing an important role in our local community by helping address food security. We watched crop after crop of organically grown produce cultivated and harvested for use. The farmer who leased the property was recently awarded a partnership grant where part of his crops go to the Farm to Fork program so those who need it most have access to healthy food sources. Why take away something that was addressing such an important need in our local communities?

My other concern is that the current developer's intent is apparently to tie in this entire project to the existing sewer that services Casitas Village (290 units). While the Sanitary District says they have the capacity to provide sewer services to the area, if new lines are not part of the developer's project then we are taxing an already challenged sewer system that is over 50 years old. This property is less than half a mile from the ocean, where I work and play. I do not want more beach closures and altered marine ecosystems because we are glossing over potential infrastructure weaknesses.

I am not anti-development or anti-growth. I recognize the need for more housing in our communities; particularly affordable housing. The frustration I have is that there are plenty of other options that would be much better suited for development. There is no need to rezone this parcel that already plays a valuable role in the community. Across the city and county there are acres of buildings no longer in use due to major changes in post-Covid

business practices. Infrastructure is already in place in these areas. They are already “urban.” These sites would spread out the density of our city population. Repurposing these properties is just one example of better planning policy for our housing needs in Carpinteria and Santa Barbara County.

Thank you for considering my arguments against approving County of Santa Barbara LCP Amendment No. LCP-4-STB-24-0028-1-Part B.

Andrea Mills  
PO Box 509  
Carpinteria, Ca 93014



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**FW: Public Comment on November 2025 Agenda Item Thursday 11a - County of Santa Barbara LCP Amendment No. LCP-4-STB-24-0028-1-Part B (Housing Element Update/Rezoning).**

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**From** SouthCentralCoast@Coastal <SouthCentralCoast@coastal.ca.gov>

**Date** Fri 10/31/2025 9:57 AM

**To** Gonzalez, Denise@Coastal <Denise.Gonzalez@coastal.ca.gov>

---

**From:** Drew Smith <drews14229@gmail.com>

**Sent:** Thursday, October 30, 2025 8:47 PM

**To:** SouthCentralCoast@Coastal <SouthCentralCoast@coastal.ca.gov>

**Subject:** Public Comment on November 2025 Agenda Item Thursday 11a - County of Santa Barbara LCP Amendment No. LCP-4-STB-24-0028-1-Part B (Housing Element Update/Rezoning).

You don't often get email from [drews14229@gmail.com](mailto:drews14229@gmail.com). [Learn why this is important](#)

I don't support the proposed rezonings near Carpinteria.

Sent from my Verizon, Samsung Galaxy smartphone

Get [Outlook for Android](#)

## **To California Coastal Commission**

### **Item #Th11a**

Dear Commissioners:

I am writing regarding the Santa Barbara County proposal to rezone 3 areas of urban/rural boundaries of Carpinteria. This action would overpower the very element of Carpinteria that embodied the "small beach town charm" that has guided decades of City planning and zoning. This entails the deliberate urban/rural boundary which not only preserves the esthetics of a small beach town but also offers greater resilience against wildfires. To rezone in order to provide high density housing that isn't even essential at this location is extremely counterproductive to the careful planning of Carpinteria.

Developers are capitalizing on the newcomers to Carpinteria by forcing it to become a town of those who value socializing, found in any town in the country, over the introspection and serenity that can be readily found here, and here alone. Such places are now rare in coastal regions, and it is the responsibility of the Coastal Commission to help preserve these locations if they are indeed intent on keeping the coastline accessible to all.

What the coast offers is providing mental health to all. What Carpinteria Valley offers is fertile agricultural land that this valley is prized for and once paved over is lost to all -along with vital food for people and pollinators, and everything in between. And what the CCC is losing sight of is the very thing that makes the coast unique, and why the Coastal Act exists.

What the County is nudging can be rolled into one threat: SPRAWL. And as all have feared, there will be no discernable boundaries from San Diego to San Francisco.

If the Coastal Commission allows this Santa Barbara County land grab, it will effectively lock in a sprawling expansion of high density. It will defeat the careful planning decisions Carpinteria has made. This high-density plan will forever destroy fertile farmland and scenic corridors. In essence, it will take a rare and beautiful valley and destroy its worth.

Having the ability to plan our small town is why Carpinteria became a city 50 years ago. Please do not allow this rezoning.

Susan Mailheau,

Resident of Carpinteria

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**Fw: Public Comment on November 2025 Agenda Item Thursday 11a - County of Santa Barbara LCP Amendment No. LCP-4-STB-24-0028-1-Part B (Housing Element Update/Rezoning).**

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**From** SouthCentralCoast@Coastal <SouthCentralCoast@coastal.ca.gov>

**Date** Thu 10/30/2025 9:42 AM

**To** Gonzalez, Denise@Coastal <Denise.Gonzalez@coastal.ca.gov>

-----Original Message-----

**From:** Kimberly Rosenthal <greenize1@hotmail.com>

**Sent:** Wednesday, October 29, 2025 8:49 PM

**To:** SouthCentralCoast@Coastal <SouthCentralCoast@coastal.ca.gov>

**Subject:** Public Comment on November 2025 Agenda Item Thursday 11a - County of Santa Barbara LCP Amendment No. LCP-4-STB-24-0028-1-Part B (Housing Element Update/Rezoning).

[You don't often get email from greenize1@hotmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

I do NOT support the proposed Carpinteria rezoning.

Thank you,  
Kimberly Rosenthal  
Santa Barbara County resident

Sent from my iPhone

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**FW: County of Santa Barbara LCP Amendment No. LCP-4-STB-24-0028-1-Part B (Housing Element Update/Rezones).**

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**From** SouthCentralCoast@Coastal <SouthCentralCoast@coastal.ca.gov>  
**Date** Wed 10/29/2025 4:24 PM  
**To** Liddell, Tyler@Coastal <tyler.liddell@coastal.ca.gov>  
**Cc** Gonzalez, Denise@Coastal <Denise.Gonzalez@coastal.ca.gov>

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**From:** john jackson <jjcarp51@gmail.com>  
**Sent:** Wednesday, October 29, 2025 4:02 PM  
**To:** SouthCentralCoast@Coastal <SouthCentralCoast@coastal.ca.gov>  
**Subject:** County of Santa Barbara LCP Amendment No. LCP-4-STB-24-0028-1-Part B (Housing Element Update/Rezones).

You don't often get email from [jjcarp51@gmail.com](mailto:jjcarp51@gmail.com). [Learn why this is important](#)

I write to strenuously object to potential rezoning of certain properties that adjoin Carpinteria. The city is already strained by the influx of people into a small beach town. There is neither the ability nor money to manage the new citizens that would be outside the City borders. Any decision to green light these projects will do permanent damage to our quality of life we have enjoyed for many happy, peaceful and safe years. Please do not change that as once the changes are upon us, there is no going back.

Thank you for your considerations,  
John and Becky Jackson  
Byrnes Lane  
Carpinteria, CA since 1991

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**FW: Public Comment on November 2025 Agenda Item Thursday 11a - County of Santa Barbara LCP Amendment No. LCP-4-STB-24-0028-1-Part B (Housing Element Update/Rezones).**

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**From** SouthCentralCoast@Coastal <SouthCentralCoast@coastal.ca.gov>

**Date** Wed 10/29/2025 12:08 PM

**To** Gonzalez, Denise@Coastal <Denise.Gonzalez@coastal.ca.gov>

 2 attachments (12 MB)

Thomas Fire video.MOV; Driveway during file.jpg;

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**From:** Jean-Luc Bourdon <jeanlucbourdon@outlook.com>

**Sent:** Wednesday, October 29, 2025 12:04 PM

**To:** SouthCentralCoast@Coastal <SouthCentralCoast@coastal.ca.gov>

**Subject:** Public Comment on November 2025 Agenda Item Thursday 11a - County of Santa Barbara LCP Amendment No. LCP-4-STB-24-0028-1-Part B (Housing Element Update/Rezones).

You don't often get email from [jeanlucbourdon@outlook.com](mailto:jeanlucbourdon@outlook.com). [Learn why this is important](#)

Dear Commissioners,

I am writing to urge you to **deny Santa Barbara County's proposal to rezone three sites just outside Carpinteria's city limits** for high-density residential development, including the Red Tail project on Bailard Avenue.

This plan is fundamentally inconsistent with the California Coastal Act and decades of sound planning in the Carpinteria Valley. The Urban/Rural Boundary was created precisely to prevent sprawl, protect agriculture, and maintain the integrity of the Coastal Zone. Weakening it now would set a dangerous precedent that undermines the protections that have preserved Carpinteria's unique character and coastal resources.

### **Why This Matters**

Carpinteria residents have a long history of protecting our community—defeating onshore drilling, saving the Bluffs, and stopping incompatible development. Last year, hundreds of Carpinterians spoke out against this rezoning at County hearings. Despite overwhelming opposition, the County moved forward. The Coastal Commission must now listen to the community's voice where the County would not.

### **Fire Safety and the Agricultural Buffer**

The Bailard property's current agricultural zoning is not an abstract planning principle—it has already protected lives and homes.

In **December 2017, during the Thomas Fire**, the entire Bailard neighborhood was evacuated for days as flames circled Carpinteria from Ventura County to Montecito. The agricultural land surrounding our homes, including the Bailard site, acted as the **intended buffer** between urban and wildfire zones.

Attached is a **video of the Thomas Fire taken from Monte Vista Park**, adjacent to the Bailard Avenue subject property, and a **photo from my driveway showing the fire burning beyond the Bailard agricultural buffer zone**. These images illustrate how this land functioned exactly as planned—**absorbing risk, creating defensible space, and protecting our neighborhood**.

Now, Red Tail LLC proposes to erase that buffer and replace it with an **extreme-density “tinderbox” of 3-story housing**, directly adjacent to agricultural fields and in the same fire-vulnerable corridor. This is reckless planning that disregards the lessons of lived experience.

### **Key Concerns**

- **Violation of the Urban/Rural Boundary** – These parcels (Van Wingerden 1, Van Wingerden 2, and Bailard) lie outside the Urban/Rural Boundary. Rezoning them to DR-20/30 density (20–30 units per acre) is incompatible with their location and violates the Coastal Act’s mandate to protect agricultural land and prevent sprawl.
- **Agricultural Loss** – Two of the sites are currently zoned for agriculture and include **Prime Farmland and Farmland of Statewide Importance**. Paving them over would destroy irreplaceable farmland still in active use, including organic farming.
- **Scenic Corridor Impact** – The Bailard site is in the middle of a designated scenic corridor under the County’s own Environmental Resources Management Element. Three-story buildings here would permanently damage views that define Carpinteria’s coastal identity.
- **Urban/Agricultural Conflict** – Rezoning would remove an essential buffer that reduces conflicts between farming operations and residential uses. This threatens both agriculture and neighborhood livability.
- **Traffic and Infrastructure Strain** – The Bailard off-ramp and surrounding streets are already saturated with commuters, residents, and recreational users. Approved but not yet built residential and industrial projects will make this worse. Adding hundreds of high-density units outside city limits will overwhelm local resources.

### **Carpinteria Is Already Addressing Housing**

The City of Carpinteria has recently approved several housing projects and is encouraging ADUs and multi-generational housing solutions. Local housing needs are being addressed without compromising farmland, scenic corridors, or Coastal Act protections. The County’s attempt to push high-density projects outside the city boundary is poor planning policy and unnecessary.

### **Conclusion**

The Coastal Commission has long been the safeguard of California’s coast against shortsighted development pressures. Denying this rezoning request is essential to protecting the Carpinteria Valley, honoring the Urban/Rural Boundary, and upholding the principles of the Coastal Act.

I respectfully urge you to **deny the rezoning of the Van Wingerden and Bailard sites**. Please stand with the many Carpinterians who continue to defend our community’s character, farmland, and coast.

Sincerely,

**Jean-Luc Bourdon**  
1006 Palmetto Way #A  
Carpinteria, CA

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**FW: Public Comment on November 2025 Agenda Item Thursday 11a - County of Santa Barbara LCP Amendment No. LCP-4-STB-24-0028-1-Part B (Housing Element Update/Rezones).**

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**From** SouthCentralCoast@Coastal <SouthCentralCoast@coastal.ca.gov>

**Date** Wed 10/29/2025 3:50 PM

**To** Gonzalez, Denise@Coastal <Denise.Gonzalez@coastal.ca.gov>

-----Original Message-----

From: heidi morton <heidinmorton@gmail.com>

Sent: Wednesday, October 29, 2025 3:44 PM

To: SouthCentralCoast@Coastal <SouthCentralCoast@coastal.ca.gov>

Subject: Public Comment on November 2025 Agenda Item Thursday 11a - County of Santa Barbara LCP Amendment No. LCP-4-STB-24-0028-1-Part B (Housing Element Update/Rezones).

[You don't often get email from heidinmorton@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

I strongly urge the Coastal Commission to deny the rezoning of the Bailard lot in Carpinteria. Rezoning this land for high density housing is poor planning - it butts up against agriculture, it is far from the business areas of Carpinteria, and it is dangerously close to the foothills that are a fire zone.

The City of Carpinteria also opposes this rezoning, and has urged the County not to proceed on numerous occasions, citing potential impacts to city infrastructure and incompatibility with the surrounding areas.

Finally, this rezoning will not benefit those who work in the area - Carpinteria is a small town with a small business community. It sits at the southernmost point of Santa Barbara County, and there is a long stretch of open land just south of it. Most of these future residents will commute to the larger cities north of Santa Barbara, adding to the commuter crawl and subsequent increase of poor air quality. How is this good planning? How is this good for California?

Put housing where the jobs are, not in a remote area in a small town. This seems pretty simple to me.

Thank you for your time.

Sincerely,

Heidi Morton  
Resident of Carpinteria

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**FW: Public Comment on November 2025 Agenda Item Thursday 11a - County of Santa Barbara LCP Amendment No. LCP-4-STB-24-0028-1-Part B (Housing Element Update/Rezones).**

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**From** SouthCentralCoast@Coastal <SouthCentralCoast@coastal.ca.gov>

**Date** Wed 10/29/2025 3:18 PM

**To** Gonzalez, Denise@Coastal <Denise.Gonzalez@coastal.ca.gov>

-----Original Message-----

**From:** CONNIE THOMPSON <connijo@aol.com>

**Sent:** Wednesday, October 29, 2025 3:02 PM

**To:** SouthCentralCoast@Coastal <SouthCentralCoast@coastal.ca.gov>

**Subject:** Public Comment on November 2025 Agenda Item Thursday 11a - County of Santa Barbara LCP Amendment No. LCP-4-STB-24-0028-1-Part B (Housing Element Update/Rezones).

[You don't often get email from connijo@aol.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Coast Commission,

Rezoning sites that are outside urban/Rural Boundary:

Changing this to high density residential is poor planning. Already, Carpinteria doesn't have enough parking. Adding hundreds of more people does not make any sense. Most people in CA have at least, 2 cars.

The Bailard property is proposed to be rezoned to be DR-20/30. This is ridiculously high and adjacent to agricultural lands. This would destroy the Carpinteria Valley. We have only a few 3 story buildings and buildings more would ruin the area.

I feel strongly this recommendation is not supported by the facts and is inconsistent with the purpose of the Coastal Act's agricultural resource protection policies.

Connie Thompson  
6395 Lagunitas Court  
Carpinteria ,CA. 93013  
805 450 3524  
Sent from my iPad

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**Fw: Public Comment on November 2025 Agenda Item Thursday 11a - County of Santa Barbara LCP Amendment No. LCP-4-STB-24-0028-1-Part B (Housing Element Update/Rezoning).**

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**From** SouthCentralCoast@Coastal <SouthCentralCoast@coastal.ca.gov>

**Date** Tue 10/28/2025 9:08 PM

**To** Gonzalez, Denise@Coastal <Denise.Gonzalez@coastal.ca.gov>

---

**From:** Alison BAILEY <runawayhorsepress@gmail.com>

**Sent:** Tuesday, October 28, 2025 12:56 PM

**To:** SouthCentralCoast@Coastal <SouthCentralCoast@coastal.ca.gov>

**Subject:** Public Comment on November 2025 Agenda Item Thursday 11a - County of Santa Barbara LCP Amendment No. LCP-4-STB-24-0028-1-Part B (Housing Element Update/Rezoning).

[You don't often get email from runawayhorsepress@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear thoughtful Commissioners,

The small town of Carpinteria simply cannot absorb such an enormous influx-impact of this unprecedented rezoning.

Drastically changing from one home per acre to twenty five will create dramatic unmanageable stress re: safety( not a safe ratio of police and firefighters), traffic - our asphalt streets are not in good shape now and all the additional traffic (especially insufficient parking even without summer tourists) will make a trip to the local pharmacy next to impossible and our large population of senior citizens will be unfairly impacted by this overcrowding. Emergency trips to Cottage Hospital will become harrowing.

Our natural resources are currently stressed - especially water ! The impact on our sewage systems and waste management may pollute to a breaking point.

Our air quality and fragile wildlife will suffer as well.

Most importantly, our powerful and essential reputation as a 'last great small California beach town,' will dissolve.

Future visitors will not bother to come here because we will be thought of as overcrowded as Manhattan Beach:

no parking/traffic jams/long lines for any service.

This special 'small town quality' is so incredibly important to our unique economic success.

Reputation is everything!

Overcrowding is never the answer.

Building housing in an area that can absorb and maybe even enhance a community is the solution; build in a growth area, not a very small town with such limited space and resources.

Please let wisdom and common sense guide your choices here.

Thank you very much for your kind attention.

Alison M. Schaumburg  
5377 8th St.  
Carpinteria, CA 93013

(805) 331-0289

email: runawayhorsepress@gmail.com

Sent from my iPhone

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**FW: Public Comment on November 2025 Agenda Item Thursday 11a - County of Santa Barbara LCP Amendment No. LCP-4-STB-24-0028-1-Part B (Housing Element Update/Rezoning).**

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**From** SouthCentralCoast@Coastal <SouthCentralCoast@coastal.ca.gov>

**Date** Mon 10/27/2025 10:49 AM

**To** Gonzalez, Denise@Coastal <Denise.Gonzalez@coastal.ca.gov>

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**From:** Ranell Hansen <llenar.nesnah@gmail.com>

**Sent:** Monday, October 27, 2025 10:17 AM

**To:** SouthCentralCoast@Coastal <SouthCentralCoast@coastal.ca.gov>

**Subject:** Public Comment on November 2025 Agenda Item Thursday 11a - County of Santa Barbara LCP Amendment No. LCP-4-STB-24-0028-1-Part B (Housing Element Update/Rezoning).

You don't often get email from [llenar.nesnah@gmail.com](mailto:llenar.nesnah@gmail.com). [Learn why this is important](#)

The person that is supposedly going to be re-zoned from one to 25 homes in an area that has only one entry and exit road. It is a very small road and goes onto another small road. That can be a problem for fire and emergency vehicles. If the one road is blocked, then they may not be able to get to people in trouble.

One of my other comments is that Carpinteria is a small town and having county property that is adjacent to the Carpinteria city line makes Carpinteria responsible for all of the services that this property will generate, with none of the benefits because there will be no tax base to the City of Carpinteria to pay for the services that the people who live virtually in Carpinteria will use such as fire, police and emergency services. I urge you not to approve this rezoning and either scale it down or ask them to put the project somewhere else. Our town has always been agricultural. I am a born and raised Carpinterian and I have always enjoyed the fact that our city is surrounded by agricultural land so that we will not become another LA sprawl where there are wall to wall malls and housing developments. We have a beautiful place to live and we really want to keep it that way. I think that is one of the Coastal Commission's missions. So please consider my request.

Sincerely

Ranell Hansen

Around the Block Quilting Studio

539 Walnut Ave.

Carpinteria, CA 93013

805-637-4706

[llenar.nesnah@gmail.com](mailto:llenar.nesnah@gmail.com)

[www.ranellhansen.com](http://www.ranellhansen.com)

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**FW: County of Santa Barbara LCP Amendment No. LCP-4-STB-24-0028-1-Part B (Housing Element Update/Rezones).**

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**From** SouthCentralCoast@Coastal <SouthCentralCoast@coastal.ca.gov>

**Date** Mon 10/27/2025 9:53 AM

**To** Gonzalez, Denise@Coastal <Denise.Gonzalez@coastal.ca.gov>

---

**From:** Andres <gebweb@yahoo.com>

**Sent:** Monday, October 27, 2025 1:51 AM

**To:** SouthCentralCoast@Coastal <SouthCentralCoast@coastal.ca.gov>

**Subject:** RE: County of Santa Barbara LCP Amendment No. LCP-4-STB-24-0028-1-Part B (Housing Element Update/Rezones).

You don't often get email from [gebweb@yahoo.com](mailto:gebweb@yahoo.com). [Learn why this is important](#)

Dear Sirs

I am against this rezoning. I do not want to increase the density of housing or allowed housing in or around Carpinteria.

I don't want the negative impacts: more traffic, pressure on already limited parking, increased air pollution, more town foot traffic, more strain on services. This becomes a burden on our existing residential needs for transport, facilities, utilities, and security forces. I also see this rezoning causing increased real estate purchases by non-residents, both private and corporate, for vacation rental.

I want to maintain the environment and the existing simple fresh open space provided by the current zoning, 1 house per acre. The advantages of additional housing (tax \$\$ and what else?) do not offset these damages.

I see Carpinteria losing its lower density, comparatively less busy, family flavor.

Regards,  
Andres Gebhart  
Carpinteria Resident  
805 456 9913

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**FW: Public Comment on November 2025 Agenda Item Thursday 11a - County of Santa Barbara LCP Amendment No. LCP-4-STB-24-0028-1-Part B (Housing Element Update/Rezones).**

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**From** SouthCentralCoast@Coastal <SouthCentralCoast@coastal.ca.gov>

**Date** Mon 10/27/2025 9:51 AM

**To** Gonzalez, Denise@Coastal <Denise.Gonzalez@coastal.ca.gov>

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**From:** kjstackpole <kjstackpole@cox.net>

**Sent:** Sunday, October 26, 2025 9:10 PM

**To:** SouthCentralCoast@Coastal <SouthCentralCoast@coastal.ca.gov>

**Subject:** Public Comment on November 2025 Agenda Item Thursday 11a - County of Santa Barbara LCP Amendment No. LCP-4-STB-24-0028-1-Part B (Housing Element Update/Rezones).

You don't often get email from [kjstackpole@cox.net](mailto:kjstackpole@cox.net). [Learn why this is important](#)

Rezoning these properties to high-density residential is against existing county policy and known planning principles. Carpinterians work hard to prevent urban sprawl and protect the small town character of our valley.

I and many others in this community implore that you maintain the existing zoning and do not allow this urban sprawl to destroy our agricultural community.

Thank you,  
Kim Stackpole  
4526 La Tierra Lane  
Carpinteria, 93013  
805-403-0369

Sent from my Galaxy

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**FW: Public Comment on November 2025 Agenda Item Thursday 11a - County of Santa Barbara LCP Amendment No. LCP-4-STB-24-0028-1-Part B (Housing Element Update/Rezones).**

---

**From** SouthCentralCoast@Coastal <SouthCentralCoast@coastal.ca.gov>

**Date** Mon 10/27/2025 9:52 AM

**To** Gonzalez, Denise@Coastal <Denise.Gonzalez@coastal.ca.gov>

-----Original Message-----

From: Esther Jaimes <babysock24@outlook.com>

Sent: Sunday, October 26, 2025 7:30 PM

To: SouthCentralCoast@Coastal <SouthCentralCoast@coastal.ca.gov>

Subject: Public Comment on November 2025 Agenda Item Thursday 11a - County of Santa Barbara LCP Amendment No. LCP-4-STB-24-0028-1-Part B (Housing Element Update/Rezones).

[You don't often get email from babysock24@outlook.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Surfliner hotel on behalf of many residents in Carpinteria we oppose to a hotel being built next to the railroad tracks. #1 the guests probably won't be back after hearing the trains that are so loud due to having to blow their horn at the cross street. #2 the pilings will hit water due to water level is high to be able to build a three story hotel. #3 why doesn't the city add to the parking instead of taking away the needed parking as we live across from the lot, yes it's not always full but in the summer and special occasions we can't even park in front of our own house to overflow parking. #4 adding more traffic to be congestive and dangerous for pedestrians e-bikes and cars having only this access to beach side of town. Money is not needed to add all this to our town but more important is the quality of life that we have in our beautiful town. Thank You Sent from my iPhone

---

**Fw: Can the November rezoning meeting be moved closer to Santa Barbara???**

---

**From** Moore, Elizabeth@Coastal <elizabeth.moore@coastal.ca.gov>

**Date** Mon 10/27/2025 11:01 AM

**To** Carey, Barbara@Coastal <Barbara.Carey@coastal.ca.gov>; Gonzalez, Denise@Coastal <Denise.Gonzalez@coastal.ca.gov>

Fyi -

---

**From:** ksonkin@aol.com <ksonkin@aol.com>

**Sent:** Monday, October 20, 2025 6:08 PM

**To:** ExecutiveStaff@Coastal <ExecutiveStaff@coastal.ca.gov>

**Subject:** Can the November rezoning meeting be moved closer to Santa Barbara???

You don't often get email from ksonkin@aol.com. [Learn why this is important](#)

**Dear Executive Staff, the California Coastal Commission:**

In November, the Commission is scheduled to hear a case that could affect hundreds of Carpinteria residents. But the hearing has been moved to Sacramento, hundreds of miles and many hours from our Casitas Village in Carpinteria. What's at stake is a massive proposed upzoning of Bailard avenue farmland that abuts our homes, an upzoning that could allow a monstrous development right next door to us, where insufficient parking and overcrowding are already challenges.

Many of the Casitas Village residents were planning to present their concerns at relatively nearby Redondo Beach where the Commission was going to meet and discuss in October the upzoning at Bailard and several other locations.

But that did not happen and now the Casitas Village residents, like me and my neighbors, are virtually blocked from making our case to the Commission at Sacramento; it is a 6+ hour drive and certainly a costly overnight trip.

Many of the neighbors are Hispanic American citizens, with large families and multiple jobs. A trip to Sacramento would be out of the question. We want to present our case in person.

Is there any way that the Executive Staff can re-schedule this very important (to us) hearing closer to Carpinteria (or even Ventura County) where we can more easily express our concerns in person to the Coastal Commission?

Thanks for the consideration.

Karl Sonkin

Casitas Village resident

5926 Birch, #4

Carpinteria, C 93013

Cell 415-271-1034

---

**FW: meeting on Bailard rezoning moved to November in Sacramento?**

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**From** SouthCentralCoast@Coastal <SouthCentralCoast@coastal.ca.gov>

**Date** Thu 10/16/2025 9:39 AM

**To** Gonzalez, Denise@Coastal <Denise.Gonzalez@coastal.ca.gov>

Hi Denise,

Is this comment for LCP-4-STB-24-0028-1-Part B?

---

**From:** Moore, Elizabeth@Coastal <elizabeth.moore@coastal.ca.gov>

**Sent:** Wednesday, October 15, 2025 2:19 PM

**To:** Fearer, Sam@Coastal <sam.fearer@coastal.ca.gov>

**Cc:** SouthCentralCoast@Coastal <SouthCentralCoast@coastal.ca.gov>

**Subject:** Fw: meeting on Bailard rezoning moved to November in Sacramento?

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**From:** Tristine Rainer <[tristinerainerihm@gmail.com](mailto:tristinerainerihm@gmail.com)>

**Sent:** Tuesday, October 14, 2025 9:27 AM

**To:** ExecutiveStaff@Coastal <[ExecutiveStaff@coastal.ca.gov](mailto:ExecutiveStaff@coastal.ca.gov)>

**Subject:** meeting on Bailard rezoning moved to November in Sacramento?

[You don't often get email from [tristinerainerihm@gmail.com](mailto:tristinerainerihm@gmail.com). Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Executive Staff, California Coastal Commission,

Many of us who live in Carpinteria in Casitas Village, smack next to the proposed dense apartment development on Bailard Ave., were planning to drive to Redondo beach to register our objections to this rezone and development. We do not know why it was rescheduled for next month in Sacramento, but we are hoping that it can be rescheduled at a time and place where we will be able in person to give the Coastal Commission important, relevant information.

We are a relatively low income neighborhood. Our already very dense condo development was built as worker housing; it is still is the most affordable condo community in Carpinteria. Many of our residents are Hispanic American citizens who have large families and multiple jobs. The overcrowding and insufficient parking, already a problem here, will be catastrophic if the Bailard development is built, but we have not been able to afford lawyers and few residents here can afford to travel to Sacramento for this all important hearing.

Please try re-schedule the hearing for a time and place closer to Santa Barbara or Ventura county where we can present the facts to you.

Thank you for your consideration,

Tristine Rainer  
Casitas Village,

5966 Via Real, #2  
Carpinteria, CA 93013  
818 800-1331

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**FW: Public Comment on Oct 2025 Agenda Item Wed 14c – County of SB LCP Amendment**

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**From** SouthCentralCoast@Coastal <SouthCentralCoast@coastal.ca.gov>

**Date** Thu 10/16/2025 9:36 AM

**To** Gonzalez, Denise@Coastal <Denise.Gonzalez@coastal.ca.gov>

---

**From:** Moore, Elizabeth@Coastal <elizabeth.moore@coastal.ca.gov>

**Sent:** Wednesday, October 15, 2025 2:17 PM

**To:** Fearer, Sam@Coastal <sam.fearer@coastal.ca.gov>

**Cc:** SouthCentralCoast@Coastal <SouthCentralCoast@coastal.ca.gov>

**Subject:** Fw: Public Comment on Oct 2025 Agenda Item Wed 14c – County of SB LCP Amendment

Fyi -

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**From:** Carrie Miles <[CarrieM@fastmail.com](mailto:CarrieM@fastmail.com)>

**Sent:** Tuesday, October 14, 2025 1:16 PM

**To:** ExecutiveStaff@Coastal <[ExecutiveStaff@coastal.ca.gov](mailto:ExecutiveStaff@coastal.ca.gov)>; [carpinteriavalleyassociation@gmail.com](mailto:carpinteriavalleyassociation@gmail.com)

<[carpinteriavalleyassociation@gmail.com](mailto:carpinteriavalleyassociation@gmail.com)>

**Subject:** Public Comment on Oct 2025 Agenda Item Wed 14c – County of SB LCP Amendment

You don't often get email from [carriem@fastmail.com](mailto:carriem@fastmail.com). [Learn why this is important](#)

I am writing to protest rezoning farmland just outside Carpinteria city-limits for high-density residential housing. The importance of the Urban/Rural Boundary and the protections of the California Coastal Act in the Coastal Zone are fundamental to good planning and have been critical in protecting the Carpinteria Valley for decades. The proposed rezoning will destroy decades of good planning.

I also believe it is foolish to build high density housing in areas that have no access to public transportation, jobs, or shopping. The farm sites along Foothill Road strike me as particularly bad locations for housing. You can barely walk down Foothill as it is. Putting housing there will require major rebuilds of the roads. Also, Carpinteria is currently being asked to make major sacrifices for the CAPP water project. Adding housing to the county that will draw on city services such as water, electricity, schools, etc. This does not make sense in little of current challenges.

I think it is also foolish to add housing in beach communities that will just be purchased as second-homes by out-of-towners. Do we really need to destroy the coast so rich people can have a beach house?

*Carrie Miles*  
Meadow Circle  
Carpinteria

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**Fw: Public Comment on October 2025 Agenda Item Wednesday 14e - County of Ventura LCP Amendment No. LCP-4-VNT-25-0010-1 (Housing Bill Implementation Ordinance).**

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**From** SouthCentralCoast@Coastal <SouthCentralCoast@coastal.ca.gov>

**Date** Fri 10/31/2025 5:10 PM

**To** Gonzalez, Denise@Coastal <Denise.Gonzalez@coastal.ca.gov>

---

**From:** Barry Gordon <[barrygordon@cox.net](mailto:barrygordon@cox.net)>

**Sent:** Thursday, October 2, 2025 6:40 AM

**To:** SouthCentralCoast@Coastal <[SouthCentralCoast@coastal.ca.gov](mailto:SouthCentralCoast@coastal.ca.gov)>

**Subject:** Public Comment on October 2025 Agenda Item Wednesday 14e - County of Ventura LCP Amendment No. LCP-4-VNT-25-0010-1 (Housing Bill Implementation Ordinance).

You don't often get email from [barrygordon@cox.net](mailto:barrygordon@cox.net). [Learn why this is important](#)

To whom it may concern As homeowner residents of Carpinteria for 25 years , we believe that the rezoning of sites outside of the urban-rural boundary for high density residential housing is very poor planning policy and should not be allowed. We need to protect agricultural resources in the Carpinteria Valley NOW. If you look at the destruction of agricultural coastal lands throughout southern California over the past fifty years it is obvious that protection of these resources is paramount today. Once gone-gone forever. Sincerely Barry Gordon /Marian Meier

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**FW: Public Comment on October 2025 Agenda Item Wednesday 14c - County of Santa Barbara LCP Amendment No. LCP-4-STB-24-0028-1-Part B (Housing Element Update/Rezones).**

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**From** SouthCentralCoast@Coastal <SouthCentralCoast@coastal.ca.gov>

**Date** Wed 10/1/2025 1:15 PM

**To** Gonzalez, Denise@Coastal <Denise.Gonzalez@coastal.ca.gov>

---

**From:** Jonathan Wilcox <jonathanswilcox@gmail.com>

**Sent:** Wednesday, October 1, 2025 11:57 AM

**To:** SouthCentralCoast@Coastal <SouthCentralCoast@coastal.ca.gov>

**Subject:** Public Comment on October 2025 Agenda Item Wednesday 14c - County of Santa Barbara LCP Amendment No. LCP-4-STB-24-0028-1-Part B (Housing Element Update/Rezones).

You don't often get email from [jonathanswilcox@gmail.com](mailto:jonathanswilcox@gmail.com). [Learn why this is important](#)

Greetings,

My name is Jonathan Wilcox, a resident at 5970 Birch Street, Apt 4. The Bailard Property should not be rezoned. It should remain zoned for 2 homes on the 7 acres as the important buffer zone between our city and large agriculture. There should not be any high-density development on this land. I oppose this rezone that would allow between 140 to 210 homes on 7 acres adjacent to the most densely populated area of our city. It would violate our city planning, cause greatly increased traffic in an already overloaded area, and pose a threat to our safety in event of an emergency. This agricultural land is a key component of what makes Carpinteria special, and to rezone this land would be to diminish our beloved city.

Thank you for your consideration,

Jonathan Wilcox

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**FW: Public Comment on October 2025 Agenda Item Wednesday 14c - County of Santa Barbara LCP Amendment No. LCP-4-STB-24-0028-1-Part B (Housing Element Update/Rezones).**

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**From** SouthCentralCoast@Coastal <SouthCentralCoast@coastal.ca.gov>

**Date** Wed 10/1/2025 10:31 AM

**To** Gonzalez, Denise@Coastal <Denise.Gonzalez@coastal.ca.gov>

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**From:** Mary Oeffling <mary.oeffling@gmail.com>

**Sent:** Tuesday, September 30, 2025 5:32 PM

**To:** SouthCentralCoast@Coastal <SouthCentralCoast@coastal.ca.gov>

**Subject:** Public Comment on October 2025 Agenda Item Wednesday 14c - County of Santa Barbara LCP Amendment No. LCP-4-STB-24-0028-1-Part B (Housing Element Update/Rezones).

You don't often get email from [mary.oeffling@gmail.com](mailto:mary.oeffling@gmail.com). [Learn why this is important](#)

As a resident of Carpinteria, I plead with you to keep our urban/rural boundary intact and NOT rezone the farmland known as the Bailard Farm as well as the Van Wingerden properties on Via Real.

- I recognize the need for affordable housing, but rezoning to ~6000% increase in density, without the infrastructure in place is not the responsible way to achieve that goal. This project is wholly inappropriate for this location.
- Additionally, as we see the effects of climate changes on agriculture, much consideration should be given to eliminating productive farmland, like the Bailard Farm. It is not replaceable.
- Our city leaders (and community) have previously expressed opposition to the zoning proposals at the county level, and consequential rezoning decisions like these belong in the hands of our city leaders, as it will forever change the nature of our community.

Thank you for your consideration.

Mary Oeffling  
Carpinteria resident

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**Fw: Agenda for 10/8, Item #14c**

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**From** Moore, Elizabeth@Coastal <elizabeth.moore@coastal.ca.gov>  
**Date** Thu 10/2/2025 5:13 PM  
**To** Gonzalez, Denise@Coastal <Denise.Gonzalez@coastal.ca.gov>  
**Cc** SouthCentralCoast@Coastal <SouthCentralCoast@coastal.ca.gov>

Fyi -

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**From:** my.biz@tutanota.de <my.biz@tutanota.de>  
**Sent:** Tuesday, September 30, 2025 3:04 PM  
**To:** ExecutiveStaff@Coastal <ExecutiveStaff@coastal.ca.gov>  
**Subject:** Agenda for 10/8, Item #14c

You don't often get email from my.biz@tutanota.de. [Learn why this is important](#)

Hi,

What are the properties that are under consideration on the Agenda for 10/8, under item 14c, which reads as follows --

County of Santa Barbara LCP Amendment No. LCP-4-STB-24-0028-1-Part B (Housing Element Update/Rezoning)

Thank you,

Jesse Musselman

--

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<https://tuta.com/free-email>

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**Fw: Housing Element Updates/Rezones item 14C - Oct 8 agenda**

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**From** Moore, Elizabeth@Coastal <elizabeth.moore@coastal.ca.gov>

**Date** Thu 10/2/2025 5:12 PM

**To** Gonzalez, Denise@Coastal <Denise.Gonzalez@coastal.ca.gov>

**Cc** CentralCoast@Coastal <CentralCoast@coastal.ca.gov>

Fyi -

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**From:** caryn chavez <carynchavez@gmail.com>

**Sent:** Monday, September 29, 2025 8:24 AM

**To:** ExecutiveStaff@Coastal <ExecutiveStaff@coastal.ca.gov>

**Subject:** Housing Element Updates/Rezones item 14C - Oct 8 agenda

You don't often get email from carynchavez@gmail.com. [Learn why this is important](#)

My name is Caryn Chavez and I live in Carpinteria. Seeing the potential for rezoning to allow for making it easier for more homes, taller buildings to be allowed, while making the population more dense makes me literally sick to my stomach.

Coming from Orange County, I moved to Santa Barbara County for a reason. To get away from the constant builders looking for any tiny bit of open space to build more homes, apartments, whatever. I don't know when cities and counties will see that WE HAVE ENOUGH. It never seems to end in California. By allowing this you will take away what everyone treasures about our county and, in my case, my city. And for what? To squish more people in for MORE MONEY. Leaving OC was the best thing I ever did. I saw firsthand the race for more, more, more. Everyone needed bigger houses, more cars, builders wanted more shopping malls and more homes. By the time I left I couldn't WAIT to get out. Please stop allowing builder to come in like ants desperate for any open space to build on. The open spaces are sacred. Not having OC crazy traffic, not having over-populated areas, not having something in every bit of open land is sacred. Taller buildings just take away from the view. DO NOT TURN INTO ORANGE COUNTY. If the zoning changes are allowed, that is what we are opening our doors to and I can say firsthand, we need to leave this beautiful county and our cities the way they are. This constant need to have more, more fueled by greed and ego are disgusting. Can't we leave our precious communities the way they are?

I will do anything, join any committee, volunteer, etc. to ensure this doesn't happen. SB County is a sanctuary, and you will destroy it by allowing us to become so densely populated. STOP WITH THIS NEED TO CONSTANTLY BE BIGGER. Builders can turn right back and go to OC or other counties who love growth....LEAVE OUR AREAS ALONE. NO REZONING to benefit builders!!!!!!

LEAVE OUR AREAS ALONE...DO NOT REZONE!

Caryn Chavez  
Santa Barbara County resident

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**Fw: "Public Comment on Oct 2025 Agenda Item Wed 14c – County of SB LCP Amendment"**

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**From** Moore, Elizabeth@Coastal <elizabeth.moore@coastal.ca.gov>

**Date** Thu 10/2/2025 5:11 PM

**To** Gonzalez, Denise@Coastal <Denise.Gonzalez@coastal.ca.gov>

**Cc** SouthCentralCoast@Coastal <SouthCentralCoast@coastal.ca.gov>

---

**From:** llenarnesnah <llenar.nesnah@gmail.com>

**Sent:** Sunday, September 28, 2025 8:31 PM

**To:** ExecutiveStaff@Coastal <ExecutiveStaff@coastal.ca.gov>

**Subject:** "Public Comment on Oct 2025 Agenda Item Wed 14c – County of SB LCP Amendment"

[You don't often get email from llenar.nesnah@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Concerning the proposed developments, I have some concerns.

First, I believe that the establishment of the Coastal Commission was to preserve agricultural land to avoid the urban sprawl to sensitive areas such as the Carpinteria Valley. This project seems to be chipping away at those protections that have been in place since I was a kid growing up in Carpinteria. We have a unique and beautiful valley and it would be a shame to see it become another overpopulated beach area like we see in the rest of Southern California. I oppose the rezoning for this reason.

The Van Wingerden 1 development is located in an area with only one way in and out. Putting such high density (30-40 per acre) housing units there will put additional strain on city streets without providing revenue with which to fix them. There is a 6 unit apartment complex in my neighborhood with garages in each unit. Tenants in each unit have at least two vehicles and some have additional work vehicles that are parked on the street. It is naive to think that there will be one car per unit. This is poor ( or no) planning on the part of the developers and the county.

The Bailard property is prime agricultural land. I believe it is being farmed as an organic farm right now. Organic farming is good for everyone and for the environment. Having spoken to a friend who lives adjacent to the property, there could also be traffic flow problems associated with high density development in that area.

The proposed development density would impact Carpinteria's schools, water and sewer, fire and police, and overall quality of life for current residents. Attaching high density housing to the city without the the tax base to pay for services downgrades the quality of those service to everyone.

I am a lifetime resident of Carpinteria. My mother's family came here in 1939 when she was in high school. My father owned Carpinteria Plumbing company. My uncles were lemon and later avocado

ranchers. Agriculture is our heritage and should be preserved.

I oppose the rezoning because I think it is poorly planned and will negatively impact the City of Carpinteria and Carpinteria Valley as a whole.

Ranell Hansen  
539 Walnut Ave.  
Carpinteria, CA

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**Fw: Public Comment on Oct 2025 Agenda Item Wed 14c – County of SB LCP Amendment**

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**From** Moore, Elizabeth@Coastal <elizabeth.moore@coastal.ca.gov>

**Date** Thu 10/2/2025 5:07 PM

**To** Gonzalez, Denise@Coastal <Denise.Gonzalez@coastal.ca.gov>

**Cc** SouthCentralCoast@Coastal <SouthCentralCoast@coastal.ca.gov>

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**From:** Robert Lesser <bobbyless@aol.com>

**Sent:** Friday, September 26, 2025 5:52 PM

**To:** ExecutiveStaff@Coastal <ExecutiveStaff@coastal.ca.gov>

**Cc:** Lee Roy <Roylee@countyofsb.org>; Villalobos David <dvillalo@countyofsb.org>; Nomura Wade <wadenomura@wadenomura.com>; carpinteriavalleyassociation@gmail.com <carpinteriavalleyassociation@gmail.com>; Alarcon Natalia <NataliaAlarcon@Carpinteriaca.gov>; Cotchett Joe <jcotchett@cpmlegal.com>; JuliaMayer@carpinteriaca.gov <JuliaMayer@carpinteriaca.gov>; AlClark@carpinteriaca.gov <AlClark@carpinteriaca.gov>; Villalobos David <sbcob@countyofsb.org>; Villanueva Diana <Diana.Villanueva@mail.house.gov>; Tittle Jeremy <jeremy.tittle@mail.house.gov>

**Subject:** Re: Public Comment on Oct 2025 Agenda Item Wed 14c – County of SB LCP Amendment

You don't often get email from bobbyless@aol.com. [Learn why this is important](#)

Dear Commissioners,

The residents of SB County are flatly against the proposed SB LCP amendment. Rezoning crucial agricultural land - sites outside the Urban/Rural Boundary

to be converted into high-density residential housing is appalling planning policy and should be denied.

(The proposed Van Wingerden 1, Van Wingerden 2, and Bailard site would inflict untold negative impacts to the South Coast.)

The importance of the Urban/Rural Boundary and the protections of the California Coastal Act in the Coastal Zone cannot be overstated; they are the foundation of wise planning and have been critical in protecting the South Coast, Carpinteria and the Carpinteria Valley for decades.

This legacy of sane, thoughtful planning must be continued.

At the top of the numerous ills such ill-conceived development would inflict, unimaginable traffic would be among the worst.

**There are only single lane roads** in the area and there are already significant traffic backups daily by Carpinteria High School and adjacent roads. Nor is there any possibility of road expansion in the area

nor any infrastructure to support said construction.

Do take a drive by the high school any afternoon and see for yourselves.

Also try navigating Via Real, the sole road to access the other proposed Van Wingerden development/

conversion from Ag to residential. Moreover, these projects would install 3-story buildings smack in the middle of Carpinteria's **scenic corridor**.

Question: why *does very* housing element proposal targeted the agricultural lands of either Carpinteria or Goleta - or parts of downtown Santa Barbara? -

*but never in Montecito*- where the largest swaths of county land are available.

We appreciate your consideration of these vital issues.

Sincerely,

Robert Lesser

Carpinteria, Ca. 93013

---

**Fw: "Public Comment on Oct 2025 Agenda Item Wed 14c – County of SB LCP Amendment"**

---

**From** Moore, Elizabeth@Coastal <elizabeth.moore@coastal.ca.gov>

**Date** Mon 10/6/2025 2:07 PM

**To** Gonzalez, Denise@Coastal <Denise.Gonzalez@coastal.ca.gov>

**Cc** SouthCentralCoast@Coastal <SouthCentralCoast@coastal.ca.gov>

---

**From:** RTM <rtm.biz.2020@gmail.com>

**Sent:** Friday, September 26, 2025 9:05 AM

**To:** ExecutiveStaff@Coastal <ExecutiveStaff@coastal.ca.gov>

**Subject:** "Public Comment on Oct 2025 Agenda Item Wed 14c – County of SB LCP Amendment"

You don't often get email from rtm.biz.2020@gmail.com. [Learn why this is important](#)

I am totally opposed to the rezoning of land that changes agricultural to any kind of residential

RANDALL T MOON  
5512 CALLE ARENA  
CARPINTERIA 93013

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**FW: Public Comment on October 2025 Agenda Item Wednesday 14c - County of Santa Barbara LCP Amendment No. LCP-4-STB-24-0028-1-Part B (Housing Element Update/Rezoning).**

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**From** SouthCentralCoast@Coastal <SouthCentralCoast@coastal.ca.gov>

**Date** Fri 9/26/2025 9:41 AM

**To** Gonzalez, Denise@Coastal <Denise.Gonzalez@coastal.ca.gov>

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**From:** patty\_bryant@cox.net <patty\_bryant@cox.net>

**Sent:** Thursday, September 25, 2025 5:36 PM

**To:** SouthCentralCoast@Coastal <SouthCentralCoast@coastal.ca.gov>

**Subject:** Public Comment on October 2025 Agenda Item Wednesday 14c - County of Santa Barbara LCP Amendment No. LCP-4-STB-24-0028-1-Part B (Housing Element Update/Rezoning).

You don't often get email from [patty\\_bryant@cox.net](mailto:patty_bryant@cox.net). [Learn why this is important](#)

Dear Commissioners,

This letter is to inform you of my opposition to the rezoning of sites Bailard, Van Wingerden 1 and Van Wingerden 2 in the Carpinteria Valley.

Rezoning sites that are outside the Urban/Rural Boundary (Van Wingerden 1, Van Wingerden 2, and Bailard) to be high-density residential is poor planning policy and should be denied. The importance of the Urban/Rural Boundary and the protections of the California Coastal Act in the Coastal Zone are fundamental to good planning and have been critical in protecting the Carpinteria Valley for decades. This legacy of sound planning must be continued.

- The project would destroy an **important buffer between urban and agricultural uses** that minimizes conflicts between these fundamentally different land uses.
- The proposal **disregards the Urban/Rural Boundary**, an important planning tool for preventing sprawl and its associated problems.
- The project would pave over land identified as **Farmland of Statewide Importance and Prime Farmland** – land that is presently used for organic farming.
- The project would place 3-story buildings in the middle of a **scenic corridor** as mapped by the County's own Environmental Resources Management Element (ERME).

These sites are proposed to be rezoned to be DR-20/30 and therefore, they could be built at 20-30 residential units per acre. That density is much too high for these locations outside the urban area and adjacent to agricultural lands.

Please deny the rezoning of these parcels and sustain the Urban/Rural Boundary and the protections of the California Coastal Act.

Sincerely,

Patricia Bryant

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**Fw: Public Comment on Oct 2025 Agenda Item Wed 14c – County of SB LCP Amendment**

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**From** Moore, Elizabeth@Coastal <elizabeth.moore@coastal.ca.gov>  
**Date** Thu 10/2/2025 5:09 PM  
**To** Gonzalez, Denise@Coastal <Denise.Gonzalez@coastal.ca.gov>  
**Cc** SouthCentralCoast@Coastal <SouthCentralCoast@coastal.ca.gov>

Fyi -

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**From:** Cynthia Steen <csteen12@gmail.com>  
**Sent:** Friday, September 26, 2025 12:57 PM  
**To:** ExecutiveStaff@Coastal <ExecutiveStaff@coastal.ca.gov>  
**Subject:** Public Comment on Oct 2025 Agenda Item Wed 14c – County of SB LCP Amendment

You don't often get email from csteen12@gmail.com. [Learn why this is important](#)

Rezoning sites that are outside the Urban/Rural Boundary (Van Wingerden 1, Van Wingerden 2, and Bailard) to be high-density residential is poor planning policy and should be denied. The importance of the Urban/Rural Boundary and the protections of the California Coastal Act in the Coastal Zone are fundamental to good planning and have been critical in protecting the Carpinteria Valley for decades. This legacy of sound planning must be continued.

Sincerely,  
Cynthia Steen  
Carpinteria, CA resident

Sent from my iPhone

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**FW: Public Comment on Oct 2025 Agenda Item Wed 14c – County of SB LCP Amendment**

---

**From** SouthCentralCoast@Coastal <SouthCentralCoast@coastal.ca.gov>

**Date** Fri 10/3/2025 10:59 AM

**To** Gonzalez, Denise@Coastal <Denise.Gonzalez@coastal.ca.gov>

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**From:** Moore, Elizabeth@Coastal <elizabeth.moore@coastal.ca.gov>

**Sent:** Friday, October 3, 2025 10:44 AM

**To:** Gonzalez, Denise@Coastal <Denise.Gonzalez@coastal.ca.gov>

**Cc:** SouthCentralCoast@Coastal <SouthCentralCoast@coastal.ca.gov>

**Subject:** Fw: Public Comment on Oct 2025 Agenda Item Wed 14c – County of SB LCP Amendment

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**From:** Ted Rhodes <[rhodes.ted@gmail.com](mailto:rhodes.ted@gmail.com)>

**Sent:** Thursday, September 25, 2025 11:51 AM

**To:** ExecutiveStaff@Coastal <[ExecutiveStaff@coastal.ca.gov](mailto:ExecutiveStaff@coastal.ca.gov)>

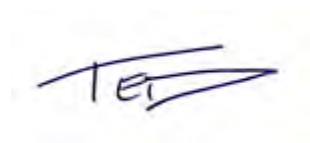
**Subject:** Public Comment on Oct 2025 Agenda Item Wed 14c – County of SB LCP Amendment

You don't often get email from [rhodes.ted@gmail.com](mailto:rhodes.ted@gmail.com). [Learn why this is important](#)

Dear California Coastal Commissioners,

Dealing with the state-mandated “Housing Element Update, the County of Santa Barbara’s Board of Supervisors ignored the recommendations of its own Planning Commission and did not eliminate from consideration for rezoning three properties located in the Coastal Zone of the Carpinteria Valley that are outside the Urban/Rural Boundary. These sites are Van Wingerden 1, Van Wingerden 2, and Bailard. For years, the County of Santa Barbara Planning Commission and Board of Supervisors worked diligently to maintain our urban/rural boundaries in Carpinteria and to protect the rural, agricultural character of our valley. Much as we need low income and affordable housing where we can appropriately allow it, I urge the California Coastal Commission to continue to honor and protect our urban/rural boundaries in Carpinteria and not let any state-mandates undo years and years of careful planning by the City of Carpinteria or the County of Santa Barbara. Here in Carpinteria, we cannot stress the importance of our Urban/Rural Boundary. The protections of the California Coastal Act in the Coastal Zone are fundamental to good planning and have been critical in protecting the Carpinteria Valley for decades.

Thank you.

A handwritten signature in blue ink, appearing to read "Ted", with a stylized flourish extending to the right.

Ted Rhodes

[TedPages.com](http://TedPages.com)

[805.705.8393](tel:805.705.8393)

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**Public Comment on October 2025 Agenda Item Wednesday 14c - County of Santa Barbara LCP Amendment No. LCP-4-STB-24-0028-1-Part B (Housing Element Update/Rezoning).**

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**From** Jean-Luc Bourdon <jeanlucbourdon@outlook.com>

**Date** Thu 9/25/2025 10:02 AM

**To** SouthCentralCoast@Coastal <SouthCentralCoast@coastal.ca.gov>

 2 attachments (1,007 KB)

Video.MOV; image0.jpeg;

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Dear Commissioners,

I am writing to urge you to **deny Santa Barbara County's proposal to rezone three sites just outside Carpinteria's city limits** for high-density residential development, including the Red Tail project on Bailard Avenue.

This plan is fundamentally inconsistent with the California Coastal Act and decades of sound planning in the Carpinteria Valley. The Urban/Rural Boundary was created precisely to prevent sprawl, protect agriculture, and maintain the integrity of the Coastal Zone. Weakening it now would set a dangerous precedent that undermines the protections that have preserved Carpinteria's unique character and coastal resources.

### **Why This Matters**

Carpinteria residents have a long history of protecting our community—defeating onshore drilling, saving the Bluffs, and stopping incompatible development. Last year, hundreds of Carpinterians spoke out against this rezoning at County hearings. Despite overwhelming opposition, the County moved forward. The Coastal Commission must now listen to the community's voice where the County would not.

### **Fire Safety and the Agricultural Buffer**

The Bailard property's current agricultural zoning is not an abstract planning principle—it has already protected lives and homes.

In **December 2017, during the Thomas Fire**, the entire Bailard neighborhood was evacuated for days as flames circled Carpinteria from Ventura County to Montecito. The agricultural land surrounding our homes, including the Bailard site, acted as the intended buffer between urban and wildfire zones.

This agricultural land proved its purpose: it absorbed risk and provided defensible space that shielded our community.

Now, Red Tail LLC proposes to erase that buffer and replace it with an extreme-density "tinderbox" of 3-story housing, adjacent to agricultural fields and in the direct path of wildfire history. This is reckless planning that ignores lived experience.

I've attached a video of the Thomas Fire from Monte Vista Park, right next to the Bailard property, along with a photo I took from my driveway showing the fire just beyond the Bailard agricultural buffer that protected our neighborhood.

### **Key Concerns**

- **Violation of the Urban/Rural Boundary** – These parcels (Van Wingerden 1, Van Wingerden 2, and Bailard) lie outside the Urban/Rural Boundary. Rezoning them to DR-20/30 density (20–30 units per acre) is incompatible with their location and violates the Coastal Act’s mandate to protect agricultural land and prevent sprawl.
- **Agricultural Loss** – Two of the sites are currently zoned for agriculture and include **Prime Farmland and Farmland of Statewide Importance**. Paving them over would destroy irreplaceable farmland still in active use, including organic farming.
- **Scenic Corridor Impact** – The Bailard site is in the middle of a designated scenic corridor under the County’s own Environmental Resources Management Element. Three-story buildings here would permanently damage views that define Carpinteria’s coastal identity.
- **Urban/Agricultural Conflict** – Rezoning would remove an essential buffer that reduces conflicts between farming operations and residential uses. This threatens both agriculture and neighborhood livability.
- **Traffic and Infrastructure Strain** – The Bailard off-ramp and surrounding streets are already saturated with commuters, residents, and recreational users. Approved but not yet built residential and industrial projects will make this worse. Adding hundreds of high-density units outside city limits will overwhelm local resources.

#### **Carpinteria Is Already Addressing Housing**

The City of Carpinteria has recently approved several housing projects and is encouraging ADUs and multi-generational housing solutions. Local housing needs are being addressed without compromising farmland, scenic corridors, or Coastal Act protections. The County’s attempt to push high-density projects outside the city boundary is poor planning policy and unnecessary.

#### **Conclusion**

The Coastal Commission has long been the safeguard of California’s coast against shortsighted development pressures. Denying this rezoning request is essential to protecting the Carpinteria Valley, honoring the Urban/Rural Boundary, and upholding the principles of the Coastal Act.

I respectfully urge you to **deny the rezoning of the Van Wingerden and Bailard sites**. Please stand with the many Carpinterians who continue to defend our community’s character, farmland, and coast.

Respectfully,  
 Jean-Luc Bourdon  
 1006 Palmetto Way  
 Carpinteria, CA