



CITY of CARPINTERIA, CALIFORNIA

October 25, 2021

Housing Authority of the County of Santa Barbara
Honorable Chair and Board of Commissioners
815 West Ocean Avenue
Lompoc, CA 93436

Re: Letter of objection and request for abandonment of the Bailard housing project concept.

Dear Board of Commissioners:

The City of Carpinteria City Council is writing to state its objection to a 173-unit multi-family housing project concept being considered for property at 1101 and 1103 Bailard Avenue (Project Concept), and to respectfully request your Board of Commissioners act to abandon it.

In April of 2019, the Carpinteria City Council expressed support for the City exploring, in cooperation with the Housing Authority of the County of Santa Barbara (Housing Authority), the possibility of developing multi-family residential housing at the Bailard site. The Bailard site, offered for sale by Carpinteria Unified School District, is located at the north end of Bailard Avenue, directly adjacent the City of Carpinteria's incorporated limits.

The City has a strong history of supporting new and protecting existing residential development that is affordable by design and/or includes units with affordability restrictions. Such housing is critical to meeting the housing needs of Carpinterians of all income levels. However, after multiple meetings with Housing Authority staff and its private development partner where City concerns were shared, and despite good faith efforts by all involved, we have concluded that the City can no longer lend its support to exploring multi-family housing at the Bailard site based on the Project Concept.

The City understands and respects the financial challenges of bringing apartment projects with income restricted units to fruition in our region and believes that constraints of the Bailard site will simply not permit these inherent challenges to be met while also complying with critical land use policy and regulatory requirements.

The following are the most critical issues the City has previously communicated about the Project Concept.

Annexation Process and Timing

In early 2019, the City made clear its expectation that the Bailard site be pre-zoned and annexed to the City in order for the project development application to be processed for permitting by the City. This expectation is based on good planning principles reflected that call

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for urban development to be a part of the incorporated areas of the city where local government services derive, and the City of Carpinteria certified General Plan / Local Coastal Land Use Plan, which anticipates annexation of the Bailard site and includes numerous policies that describe how the Bailard site should be developed. The Housing Authority, however, determined that it would delay any consideration of annexation to the City in order to seek the necessary legislation and development permit approvals through the County's process. The City understands that this tactical decision was made based on Housing Authority making a financial calculation of the number of apartment units and maximum entitlement cost required to support the purchase price for the property. This decision established an unstable footing upon which all subsequent discussion would occur and we believe has not allowed the Housing Authority's serious consideration of the important issues raised by the City.

Density

Wise planning practices call for higher residential densities to occur adjacent to the urban core. City and County land use policies and the California Coastal Act support these practices. The Project Concept, however, contradicts this fundamental principle by proposing the highest density at the edge of the City and next to agricultural lands. A project of the proposed density and scale fits best in, or close to, the City's urban core along pedestrian, bicycle and public transit routes and within walking distance to grocery shopping and other necessities and conveniences of daily living.

To bring the Project Concept to fruition, the County and Coastal Commission would need to redesignate and rezone the Bailard site to allow for much higher density development and adjust the designated Urban/Rural Boundary. The Bailard site is currently designated as rural residential, allowing one residence for every 3 acres. The City envisioned exploring an increase in density to accommodate a modest sized multi-family project. The Project Concept, however, would require a density of 25 residences per acre; higher than any density allowed in the City.

Our position that high density urban development is not appropriate for rural or agricultural areas along the City's edges is further supported by the following adopted policies found in both the County's and City's respective certified Local Coastal Plans (LCPs):

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.*

County Coastal Land Use Policy 4-4: *In areas designated as urban on the land use plan maps and in designated rural neighborhoods, new structures shall be in conformance with the scale and character of the existing community. Clustered development, varied circulation patterns, and diverse housing types shall be encouraged.*

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.

The City believes the density included in the Project Concept is far too high for the Bailard site and precludes the County of Santa Barbara from making a finding of consistency with the cited policies concerning the appropriate location of higher density development and the relationship of urban development to rural and agricultural areas.

Protection of Agricultural Lands

Numerous County and City Policies address Agricultural Buffers and the need to protect agricultural lands/operations from urban residential Development (County Article II Section 35-144O- Agricultural Buffers, Appendix H: Agricultural Buffer Implementation Guidelines and Santa Barbara County Right to Farm Ordinance).

Agriculture remains an important element of the Carpinteria Valley's identity, and the desire to protect and preserve the Valley's agricultural heritage going forward is critical. The zoning of the two parcels that make up the Site, among others, was intentionally changed from DR-2 to 3-E-1 in the 1980s to provide a transition/buffer area between agriculture on prime soils to the north and urban development to the south. The lots are identified in the County Local Coastal Plan as follows: "North of U. S. 101 and Bailard Avenue a residential wedge currently zoned DR-2 (permitting half-acre minimum lots) would be changed in the land use plan to three-acre minimum lots. This residential area abuts the agricultural heart of the Valley and should be treated more as a transitional zone between urban and agricultural land uses."

The Project Concept would result in paving over land identified as Farmland of Statewide Importance and Prime Farmland and that is presently used for organic farming. The conversion of productive agricultural lands designated as Prime Farmland and Farmland of Statewide Importance is potentially inconsistent with adopted City and County LCP policies, including but not limited to:

City 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.*

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.*

EDRN and Urban/Rural Boundary

The Bailard site is located within an Existing Developed Rural Neighborhood (EDRN), in the Rural Area as identified in County Comprehensive Plan maps, and outside the Urban/Rural Boundary as established by the California Coastal Commission and the City's certified Local Coastal Land Use Plan. The Project Concept would require removal from the EDRN and modification of the Urban/Rural Boundary. A Rural Neighborhood is defined as a neighborhood area that has developed historically with lots smaller than those found in the surrounding rural lands. The purpose of the EDRN boundary is to keep pockets of rural residential development from expanding onto adjacent agricultural lands. Within the rural neighborhood boundary, only infill development at densities specified on the County land use plan maps is permitted.

Approval of the Project Concept would require the adjustment of the Urban/Rural Boundary and EDRN Boundary. Removal of the Bailard site from the EDRN would isolate the adjacent parcel to the west (001-080-009) from the remainder of the EDRN, resulting in an EDRN consisting of a single parcel.

The City does not believe that the legislative actions necessitated by the Project Concept could meet the necessary standards to be found consistent with policies concerning the Urban/Rural Boundary and EDRN.

Park Space

The Bailard site is directly adjacent to Monte Vista Park, a heavily used neighborhood park. The Project Concept would create new Park use demands warranting consideration of expanding the size of Monte Vista Park pursuant to the following policy:

City Implementation Policy OSC 61: Support development of new or expanded park and recreation facilities as demand/need dictates. When latent demand for parks and recreation facilities is identified, adequate parkland and facilities shall be identified and pursued.

The City understands that the Project Concept would not include expansion of the adjacent Monte Vista Park sufficient to offset project impacts. The City believes this would result in a degraded Park experience for all users.

City Services and Infrastructure

Development of the Bailard site would require municipal services from the City and impact City infrastructure, including but not limited to, vehicle, bicycle and pedestrian roads/paths, traffic control, storm water treatment, and recreation services and amenities. As indicated previously, this supports annexation of the Bailard site to the City under any scenario where it is developed for urban use. Processing development approvals through the County where project impacts occur in the City may preclude effective and appropriate mitigation of the impacts of the development on City services and infrastructure and degrade those services and infrastructure for existing residents.

The following list provides an example of applicable City objectives and policies:

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.*

PF-5c. *The City will ensure that new development will not adversely impact services and facilities provided to existing development.*

Objective PF-6: *To ensure that new development is adequately served by utilities and does not impact existing service areas in the community.*

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.*

PF-6c. *Development projects within Carpinteria shall be required to: 1. construct and/or pay for the new on-site capital improvements that are required to support the project; 2. ensure that all new off-site capital improvements that are required by the project are available prior to certificate of occupancy; 3. be phased so as to ensure that the capital facilities that will be used by the new development are available prior to certificates of occupancy; 4. ensure that, in the event that public services or off-site capital facilities are impacted prior to development, the level of service provided to existing development will not be further impacted by the new development; and 5. provide for the provision of public services, and shall not increase the cost of public services provided to existing development.*


Planning for and facilitating the development of more multi-family housing will be critical in order to meet the housing needs of the Carpinteria Valley. Balancing the need for this development type with other priorities for use of land and resource protection will not be easy. While we urge the Housing Authority, for the above stated reasons, to abandon the Project Concept, we also recommit to working collaboratively to identify appropriate locations for affordable apartment projects in Carpinteria.

Thank you in advance for your consideration of this request.

Sincerely,


Councilmember Natalia Alarcon


Councilmember Gregg A. Carty


Councilmember Roy Lee


Vice Mayor Al Clark



Mayor Wade T. Nomura

Cc: County Board of Supervisors
California Coastal Commission
Santa Barbara LAFCO
Carpinteria Unified School District