



19 July 2023

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**Subject: Response to 2/3/23 Determination of Application Incompleteness  
Farm Preserve & Bungalows Project  
Project #23-2207-DP/LCPA/TPM/CDP  
5669 & 5885 Carpinteria Avenue; APNs 001-170-010 & -013**

Dear Syndi,

I am writing in response to your Determination of Application Incompleteness, dated March 3, 2023. In your letter you requested additional information required to continue application processing and environmental review. Below please find responses to the information requested in the Incompleteness letter. Numbering is consistent with the numbering in your letter.

First, the following project description has been updated to reflect revisions that have been made to the project and project plans in response to the Determination of Application Incompleteness and community feedback. The following project description also reflects certain key considerations that are important to describe the merits of the project. Please note the project is now being referred to as "Farm Preserve & Bungalows".

There are also two notable revisions to the project plans. The proposed finished grade at the residential portion of the project has been lowered from what was originally proposed. The finish grade at the residences is now proposed approximately 2.5 feet above the top of curb of Carpinteria Avenue. This finished grade is necessary to ensure drainage does not continue to flow offsite toward the recently built skate park (the site has historically drained off site toward the current location of the skate park). Also, a six-foot tall double batten wood fence between the People's Self-Help Housing residences and Carpinteria Avenue has been added to the plans to mitigate potential noise impacts from the street and freeway to the residences. Fences have also been added around the two proposed pools.

## **PROJECT DESCRIPTION (Updated)**

### **Project Request**

The Farm Preserve & Bungalows Project is requesting Development Plan, Parking Modification, Coastal Development Permit, Tentative Parcel Map, General Plan/Local Coastal Plan Amendment, and Architectural Review Board approvals for a mixed-use development on the privately owned property located at 5669 & 5885 Carpinteria Avenue (APNs 001-170-010 & 001-170-013). The project consists of a nature-based bungalow style retreat, affordable housing, public restaurant, regenerative farm, farm stand, event barn, accessory structures, and dedication of 50% of the property in a conservation easement for public open space, public trails, and agriculture that will be overseen by a local, third-party conservation group. The project will also include additional open space restoration, native landscaping, parking, and access improvements. Retreat development will include typical ancillary uses such as pools, a wellness/fitness area, back of house, etc. The project is requesting a reduction of development impact fees applicable to the affordable housing component of the project, which is to be developed, owned, and operated by People's Self-Help Housing, a nonprofit agency.

The project is consistent with the provisions of the existing Planned Unit Development District (PUD) zoning designation. Permitted uses in the PUD zone include clustered residential units, visitor-serving commercial facilities, open space uses, and recreational facilities.

The project completed Conceptual Review (21-2137-CON) on March 30, 2022. Staff comments and community input from Conceptual Review and the Determination of Application Incompleteness were considered in development of the currently proposed project. The applicant understands once the City has deemed the application complete, environmental review pursuant to CEQA will be conducted, as will a comprehensive policy consistency analysis and design review by the Architectural Review Board. Decision makers include the City Planning Commission, City Council, and the California Coastal Commission.

### **Key Considerations**

- The applicant and design team considered the results of multiple technical reports to ensure the project is sensitively designed to be consistent with policies, mitigation measures, implementation measures, and development standards stipulated in the City's General Plan/Local Coastal Land Use Plan (GP/LCP), Carpinteria Bluffs Coastal Access, Recreation, And Open Space Master Program (CBMP), 2023-2031 Housing Element HCD Draft, and Title 14 Zoning Code. Requested General Plan/Local Coastal Plan Amendments are intended to update the Plan to reflect current conditions at the Bluffs and amend policies that are no longer necessary or applicable.

- The project adds to the Bluffs Preserve by proposing a Parcel Map that will result in dedication of a conservation easement for public open space, public trails, and farmland on certain parcels contiguous with the existing public open space at the Bluffs, totaling 13.6 acres of additional conserved public open space. In addition to the 13.6 acres intended to be permanently conserved as open space, the retreat portion of the project includes approximately 1.6 acres of agriculture (located between the retreat and residences) and approximately 4.2 acres of native landscaping integrated in to the retreat.
- The project is partnering with People's Self-Help Housing to provide 41 units of affordable housing (including one manager's unit), 25 more units than the original proposal. A mix of 1-, 2-, and 3-bedroom units are proposed. Occupancy will be restricted to qualifying renters who earn between 30% and 60% of the median income for Santa Barbara County (low and very low-income households). The residential portion of the project will be purchased and managed by People's Self-Help Housing.
- The 41 residential units will be beneficial to the City toward complying with Regional Housing Needs Assessment (RHNA) quotas for 286 very low-income and 132 low-income households. It is noted that the City's current Housing Element does not include units on the subject site in the Housing Element site inventory and HCD has identified that the City's current inventory of sites and pending projects has an estimated realistic capacity of only 190 of the 418 lower-income RHNA units. The proposed units will address the need for lower income units without a Rezone.
- The project is designed as a continuation of the adjacent Bluffs Preserve and intends to integrate the two properties to encourage a seamless landscape-led approach that balances nature, regeneration, conservation, public access, and a farm-forward hospitality experience. Protecting viewsheds and allowing the property to be viewed as an extension of the Bluffs Preserve, with carefully located native plant species subtly screening low-rise buildings, is a fundamental part of the design.
- An essential quality of the project is preserving the property's natural elements. To ensure this quality remains, the project will connect to the existing trail system of the adjacent Bluff's Preserve. A network of trails will meander through the central and southern portions of the property, connecting to the Bluffs Preserve and providing a pathway to the coastal area.
- The retreat component of the project fulfills the intent of the GP/LCP to provide a visitor-serving use at the Bluffs. All visitor-serving structures are clustered toward the northwest portion of the site, setback a minimum of 200 feet from the north side of the railroad, consistent with the CBMP and GP/LCP. Bungalows are slightly more than 200 feet, while the pool and restaurant are setback more than 500 feet from the north side of the railroad.
- Views from Carpinteria Avenue through the developed portion of the project site are designed to match the width of the view corridor looking south down Linden Avenue.

- Retreat buildings are intended as a collection of farm/ranch-style buildings. Structures are a maximum of two stories (the tallest proposed retreat building is 26'6" feet tall) and proposed with natural exterior materials, textures, and finishes. Retreat accommodations are proposed as clusters of low-rise single-story cabins, and semi-detached bungalows with outdoor decks. The public restaurant, farm support building, events barn, and farm stand also utilize a farm/ranch style. A walking trail system connects all cabins and bungalows to the main retreat building, public restaurant and the preserve trails.
- The project includes public parking for access to proposed and existing public trails.
- An event barn will be available for community use with no rental fees for up to six community events/year.
- The Bluff top trail (including the location of the seal observation overlook and a blind for screening) will be implemented consistent with the Biological Resource Conclusions and Mitigation Measures included in the Carpinteria Bluffs Coastal Access, Recreation, And Open Space Master Program and adjacent habitat will be restored and maintained per a Habitat Mitigation and Monitoring Plan.
- An organic, regenerative farm is proposed that will provide produce for the onsite public restaurant and a public farm stand which will also showcase other local farm produce and offerings. The regenerative farm will support the farm stand with 100% organic produce.
- The project proposes native landscaping and habitat restoration. Along with implementation of a Habitat Mitigation and Monitoring Plan along the bluff, certain invasive tamarisk and eucalyptus windrow trees will be replaced with oak trees and understory plants native to the Carpinteria General Plan Area and appropriate to the soils and hydrology of the location, consistent with the CBMP.
- The project is actively continuing to develop partnerships with Chumash leaders and community organizations toward developing a native plant planting and restoration plan and other integrated elements such as interpretive signage.
- The majority of on-site parking is proposed to be subterranean to minimize visual impacts and impermeable surfaces. Subterranean parking will have a green roof for a market garden.
- No known significant cultural resources, as defined by CEQA Section 15064.5, exist within the Project site. However, due to the overall sensitive nature of the general project site and surrounding areas, it is possible that unknown cultural material and features could be encountered during Project grading and construction. Therefore, monitoring and worker training are proposed.

- The project is anticipated to generate over \$2.1 million per year in tax revenues for the City of which 80% is from transient occupancy taxes ("TOT"). This represents a potential 15% gain from the \$13.2 million in tax revenues generated in 2021 to the General Fund.
- The project represents a major economic boost to the local economy, anticipated to invest over \$100 million over the next 3-5 years, directly employing approximately 611 full time equivalent construction workers and resulting in an estimated 247 FTE general economy jobs due to indirect/ induced spending by those workers and suppliers.
- The Project will support onsite employment of approximately 133 jobs, and with resulting indirect and induced impacts from visitor spending generating approximately 52 more indirect jobs Countywide.
- The project incorporates multiple sustainability elements, including the following:
  - Solar panels for generating electricity
  - Battery storage and back up
  - Grey water recapture system for landscape irrigation
  - Over 17 acres of native plants and
  - restoration (conserved areas and retreat landscaping)
  - Skylights for passive lighting
  - Off-site fabrication as much as feasible is anticipated
  - Minimal, if any, soil export and offsite hauling is anticipated
  - Composting from the zero-waste kitchen and public areas
  - Locally sourced products to be used and sold at the retreat
  - Regenerative agriculture and farming techniques (soil will eventually be certified organic)

## **PROJECT DETAILS**

The Farm Preserve & Bungalows Project consists of a bungalow style retreat, affordable housing, restaurant, regenerative farm, farm stand, event barn, accessory structures, and dedication of a conservation easement for public open space, public trails, and agriculture to be overseen by a local, third party conservation group. The project will also include open space restoration, native landscaping, parking, and access improvements. Retreat development will include typical ancillary uses such as pools, a wellness/fitness area, and back of house use areas.

### **Existing Setting**

The site consists of two parcels totaling 27.53 acres zoned Planned Unit Development (PUD). The PUD designation is generally assigned to large undeveloped parcels that are suitable for a combination of land uses, including residential development, visitor-serving commercial facilities, recreational facilities, and open space. The parcels are separated by the Union Pacific Railroad right-of-way. The northernmost portion of the Property (APN

001-170-013) is 23.4 acres and is the present site of the Tee Time golf driving range. To the east and south of the driving range is an active agricultural operation. The southernmost parcel (APN 001-170-010), south of the railroad right-of-way, is 4.13 acres and is undeveloped except for a recreational trail that crosses the property's southernmost edge. There are no structures on the property. The driving range utilizes a mobile trailer as its office.

Adjacent land uses include the decommissioned oil processing facility, City Hall facilities, and a new skatepark to the west. The Bluffs Preserve is located to the east. To the north is Carpinteria Avenue and Highway 101, and to the south is the ocean.

Please refer to the enclosed Biological Resources Assessment Report for a detailed description of the biological setting.

### Structural Development

The project proposes approximately 122,211 square feet (SF) of structural development on the northern portion of APN 001-170-013 resulting in building and decking footprints of approximately 124,581 SF; no development is proposed on the 4.13-acre southern parcel, APN 001-170-010. Approximate square footage is summarized as follows:

<b>Use</b>	<b>Square Feet</b>
Retreat <i>(including rooms/lodges/bungalows, main retreat building, maintenance/service, fitness/wellness, pool cabana, and back of house)</i>	68,860
Residential	37,948
Event Barn	5,850
Farm Stand	450
Farm Building	1,800
Restaurant	7,303
<b>TOTAL</b>	<b>122,211</b>

The retreat component of the project is further summarized as follows:

- Lodges: 59 keys with approximately 23,680 SF of total floor area;
- Bungalows: 41 single-story keys with approximately 25,400 SF of total floor area;
- Main Retreat Building: 5,876 SF which includes the lobby and reception area, bar, guest amenities, retreat administrative offices, restrooms, and a 1,339 SF exterior deck;
- Retreat maintenance and service building: 2,668 SF;
- Wellness Building: 10,368 SF of fitness and wellness facilities which will include a

reception area, relaxation area, treatment rooms, sauna, steam rooms, gym, and restrooms (note the exterior of the Wellness Building is proposed to be bermed and substantially screened from view);

- Pool area: Pool, hot tub, 950 SF building with a 10-seat pool bar, bathrooms, changing rooms and lounge area.

The residential component of the project proposes 41 one, two, and three-bedroom affordable income-level rental apartments including a manager's unit that total approximately 38,031 SF (inclusive of a resident community center and a maintenance shed). The applicant is partnering with People's Self-Help Housing to develop, own, and manage the apartments. Outdoor residential amenities, including a playground, are proposed to serve the residential component.

The regenerative agricultural component of the project is comprised of approximately five acres of cultivated land with 1,800 SF of ancillary structures, including a farm office, garage/workshop, storage and distribution area, delivery and receiving area, compost area, and farm yard.

A 450 SF farm stand will offer produce from the property's farm to the public.

An approximately 7,386 SF public restaurant and bar is anticipated to provide 100 interior seats and a 1,308 SF outdoor seating patio for approximately 40 people.

A 5,850 SF event barn is proposed to be available for use by retreat guests and community gatherings.

Parking will be provided on-site with a total of 273 parking spaces utilizing approximately 89,623 SF of surface and below-grade parking (36,961 SF surface and 52,662 SF below grade).

## Parcel Map

The project includes a Tentative Parcel Map that will subdivide the property identified by APN 001-170-013 into three parcels. Proposed parcels will be utilized as follows: 1) retreat and farm, 2) residential, and 3) conserved public open space and agriculture north of the railroad tracks. Proposed parcels are summarized as follows:

<b><i>EXISTING PARCEL 1 (APN: 001-170-013): 1,017,815.22 SQ.FT./23.37 ACRES (GROSS/NET)</i></b>		
	<b><i>GROSS</i></b>	
<b><i>PROPOSED PARCEL 1</i></b>	<b><i>68,687.10 Sq.Ft</i></b>	<b><i>1.58 ACRES</i></b>
<b><i>PROPOSED PARCEL 2</i></b>	<b><i>536,754.28 Sq.Ft</i></b>	<b><i>12.32 ACRES</i></b>
<b><i>PROPOSED PARCEL 3</i></b>	<b><i>412,373.81 Sq.Ft</i></b>	<b><i>9.47 ACRES</i></b>
<b><i>TOTAL</i></b>	<b><i>1,017,815.22 Sq.Ft</i></b>	<b><i>23.37 ACRES</i></b>

Note the existing parcel identified by APN 001-170-010 is proposed to be conserved as public open space.

At the time of processing a Final Map, the map will include utility easements (for water and sewer lines, and drainage, as necessary). Locations will be coordinated and confirmed with applicable agencies as the project moves forward. A reciprocal access easement at the western driveway for the proposed residences will also be provided.

### **Open Space & Conservation Easement**

The project anticipates dedication of a conservation easement to preserve open space and agricultural components. These areas to be preserved in perpetuity for agriculture and public open space are intended to be a privately owned public open space overseen by a local, third-party conservation group and will be located on a separate parcel as indicated on the associated Parcel Map. Open space areas will be contiguous with existing preserved areas of the Bluffs and will be open to the public. Preserved areas consist of approximately 13.6 acres (approximately 10 acres for public trails and open space, and 3.6 acres dedicated to farming). The applicant would prefer to maintain ownership of the open space areas in order to provide for ongoing and long-term maintenance, but is amenable to discussing maintenance and easement management arrangements with the City and/or third-party non-profit land conservation organizations.

### **Public Access**

The majority of the project site will be available for use by general the public:

- 13.6 acres of open space, trails, and farmland contiguous with the existing bluffs preserve is proposed to be preserved with a conservation easement and open to the public. While the public currently informally uses a portion this area, it is private property. The project will ensure this area remains open for use by the public in perpetuity.
- It is intended that the agricultural component will host public educational workshops and experiences related to regenerative organic farming, native herbal/medicinal workshops, etc.
- The 150 seat restaurant/bar will be open to the public.
- The farm stand will be open to the public.
- The event barn will be available for use for community events (approximately 6 community events with no rental fees per year are anticipated).
- Visitor parking will have 10 spaces dedicated for use by the public.
- Residential areas will be open to the public.



The retreat and associated spa/gym and pools will be available to retreat guests.

## Parking

A total of 273 parking spaces will be provided on site with 119 spaces located in surface parking lots (36,961 SF) and 154 spaces located in a subterranean garage (52,662 SF). Parking is allocated as follows:

<b>Use</b>	<b>Spaces</b>
Retreat	99
Apartments - Residents & Visitors	51
Restaurant	35
Event Barn	16
Farm Building	10
Farm Stand	2
Employees	50
Bluffs Preserve Visitors	10
<b>Total</b>	<b>273</b>

The Project is requesting approval of a modification to reduce the required number of parking spaces from 292 parking spaces required by the Zoning Code to the proposed 273 parking spaces. The Transportation Impact Analysis prepared for the project demonstrates that the proposed number of parking spaces will meet peak weekday and weekend parking demand. With regard to community events that would be open to the public, as prescribed in the Transportation Impact Analysis the project proposes to pursue a reciprocal parking agreement with a site in Carpinteria, with shuttles provided to transport visitors to and from the project site.

The Project will include bicycle parking spaces and electric vehicle car charging stations. The surface parking lot is designed with a permeable surface. Please refer to the enclosed Traffic Impact Analysis (which includes a parking analysis) and the discussion of the analysis and parking below.

## Access

Vehicle ingress and egress to the property will be provided at two locations on Carpinteria Avenue. The site plan includes a "u-shaped" internal driveway for access to the residences, retreat, restaurant, and event barn. A loop road is also proposed through the retreat portion of the project for use by retreat staff, emergency vehicles, and retreat guests on foot (retreat guests will be walked from check-in to their respective rooms but will have the option of requesting an electric shuttle cart). Residences will be accessed from Carpinteria Avenue via a reciprocal access easement at the western driveway. Pedestrian and bicycle access will continue to be provided from Carpinteria Avenue. The project will provide pedestrian access to the Bluffs Preserve trail system and the

proposed 13.6-acre conservation easement area.

### **Grading**

Proposed grading will be balanced on site and is summarized as follows:

	<b>Cut</b>	<b>Fill</b>
Underground Parking	17,000 cy	7,000 cy
Site	30,000 cy	40,000 cy
<b>Total</b>	47,000 cy	47,000 cy

### **Employees**

The farm, retreat, and restaurant will employ approximately 133 employees rotating through 2.5 shifts, resulting in approximately 50 employees on-site at any given time.

### **Events**

Proposed structures include a 5,850 square foot event barn. The building will serve as event space for retreat and restaurant guests. It is also proposed to be available for certain community events (or “external” events). It is anticipated a shuttle service may be used to transport guests for community events.

The traffic analysis assumed that there will be up to 30 internal events per year with up to 200 guests (primarily guests staying at the retreat) and up to 6 external events with 180 visitors from the local community. The internal events would occur during the weekend and the external events would occur during the weekday.

To meet the parking demand during the external special events, the Traffic Impact Analysis recommends that the project develop a reciprocal parking agreement with a neighboring property with shuttles provided to transport visitors to and from the site.

## **INCOMPLETENESS DETERMINATION RESPONSES**

### **1. Plans:**

As discussed above, the proposed finished grade at the residential portion of the project has been lowered from what was originally proposed. It is important to note the following:

- All three residential buildings need to have the same finish floor elevations due to their grouping and to allow for reasonable ADA connections.
- The grade directly outside the residences on the north side is required by the Building Code to drop 8 inches.

- The finish floor of the western residential building is approximately 3 feet higher than top of curb at Carpinteria Avenue. The finish grade is approximately 2.4 feet higher than top of curb at Carpinteria Avenue. Carpinteria Avenue gains elevation to the east. The finish floor of the eastern residential building is approximately 2.1 feet higher than Carpinteria Avenue and the finish grade is approximately 1.76 feet higher than Carpinteria Avenue.
- Finished grades are necessary to ensure drainage does not continue to flow offsite toward the recently built skate park (the site has historically drained off site toward the current location of the skate park).
- The distance from the Carpinteria Avenue to the residential buildings is over 60 feet.

The following addresses comments from the Incompleteness Determination (please also refer to the enclosed plans and other enclosures):

- The width and centerline of Carpinteria Avenue has been indicated on the site plan (Sheet G.002.2) and civil plans (Sheet C1.00).
- On the elevations and sections, building heights are indicated as measured from the average finished grade (AFG) of each building footprint. Finished floor and finished grade are no longer shown at the same elevation.
- Proposed solar arrays are integrated into the roof of the covered parking at the residences and retreat parking lot. See locations on Sheets G.002.1 and G.002.2 and an elevation of the carport installation on Sheet AM.100.
- Requested additional site cross-sections have been added to the civil plans on Sheets C.200 through C.202: 1.) East-West through Lodge 2, the Main Retreat, and the Restaurant; 2.) East-West through the central portion of the bungalows (near the Mexican Fan Palm), and 3.) North-South through the Visitor Parking Lot, Farm Events Building, and the Restaurant extending across the RR tracks to the bluff edge.
- Roof Plans for all the proposed structures, including the locations of any solar panels, are included.
- Additional renderings are provided showing the overall proposed development looking south from Carpinteria avenue, looking north from the proposed Coastal Bluff trail, and looking east from the western trail in the Bluffs Nature Preserve Park. See rendering on sheets G.900 – G.907.
- Please see the enclosed preliminary lighting plans (Sheets LT101-LT.RD100) that show the locations of proposed exterior lighting (including along pathways) and a photometric plan. A compilation of fixture specifications/cut sheets is also enclosed.

Lighting has been designed with sensitivity to the setting. The proposed design complies with the current City standards, and complies with typical Dark Sky language. Please note that while no pathway lighting is proposed south and east of the retreat, certain pathway lighting is required within the retreat. Tree downlights are small fixtures producing a few hundred lumens each, all on dimmers, and once installed will be adjusted carefully for zero glare or uplight. Cart paths/roads are lit with 3' tall bollards located at 25'-30' on-center spacing. While very little light is produced by these, they will help orient and direct guests through the property.

- A six-foot tall double batten wood fence between the residences and Carpinteria Avenue has been added to the plans to mitigate potential noise impacts from the street and freeway to the residences. The plans also include a split rail fence on each side of the railroad tracks as stipulated in the CBMP. Please refer to Sheet G.002.6.
- Proposed trash/recycling dumpsters and receptacles are indicated on Sheets G.002.2 and G.002.3. Access has been preliminarily reviewed by E.J. Harrison and Sons, Inc. and determined to be adequate.

## **2. Project Description:**

The updated Project Description provided above indicates which portions of the proposed project would be available for use by the general public (see section titled Public Access).

## **3. Story Poles:**

A revised Story Pole Plan for the following, reflecting the lower elevation of the residences is forth coming:

- Residential buildings and related Community Center
- Main retreat building
- Lodge retreat buildings 1 and 2
- Bungalows (certain buildings around the perimeter of the proposed bungalow layout)
- Fitness/spa building
- Farm Events building
- Restaurant

It is understood the project may be scheduled for review by the Architectural Review Board once the application is deemed complete, and story poles are required to be erected two weeks prior to the first Architectural Review Board hearing.

## **4. Official Records:**

Enclosed please find copies of the following:

- Document #9872, recorded August 11, 1949, in Book 868 Page 164 O.R. This is a Grant Deed from Teresa Franklin to the County of Santa Barbara for the purpose of the freeway.
- Document #8237, recorded May 20, 1953, in Book 1153 Page 185 O.R. This is a Grant Deed from Teresa Franklin to the County of Santa Barbara for the purpose of the freeway.

#### **5. Parking:**

The above updated project description includes a request for approval of a modification to reduce the required number of parking spaces from 292 parking spaces required by the Zoning Code to the proposed 273 parking spaces.

#### **6. Fire Protection Certificate Application:**

A receipt for the \$343.00 fee paid to the Carpinteria- Summerland Fire Protection District is enclosed, along with the District's comment letter signed on March 9, 2023.

#### **7. Annexation into the Carpinteria Sanitary District:**

It is understood that project approval will be conditioned to require annexation to Carpinteria Sanitary District prior to map recordation. The subject property is currently in the Carpinteria Sanitary District Sphere of Influence.

#### **8. Traffic Study:**

To date the project team has received a comment/condition letter from the City Public Works Department dated May 31, 2023. Though requested several times, no comments have been received by Caltrans. The team has been informed that Caltrans may provide comments during environmental review.

#### **9. Farmland Impact Study:**

The project proposes an approximately 5-acre agricultural component that is intended be regenerative, organic, and open to the public. Enclosed please find a Farmland Impact Study prepared by Rincon Consultants, Inc. dated June 2023. The Study concludes the proposed project would not result in potentially significant impact on agricultural suitability or productivity.

#### **10. Noise Study:**

Enclosed please find a Noise Technical Report prepared by Dudek dated June 2023. The report recommends certain mitigation measures for the residential units as follows:

- Exterior door and window assemblies on the northern building façade (facing Carpinteria Avenue and US Highway 101) should have a minimum sound transmission class (STC) rating of 33.
- Because doors and windows would need to be in the closed position to achieve compliance with the interior noise level of 45 dBA CNEL, each residential unit in the building should be equipped with air conditioning or mechanical ventilation to maintain comfortable interior temperatures when the doors and windows are closed.

### **11. Tentative Parcel Map:**

Please refer to the enclosed updated parcel map. TPM #25,202 has been added to the map.

### **12. Electronic Copies:**

Digital copies of revised plans, renderings, documents, and requested reports in PDF format are being provided.

### **Advisory Information**

- 1. Development Impact Fees:** The applicant and project team understand that the project, if approved, will be subject to the payment of development impact fees. The project is requesting a reduction of development impact fees applicable to the affordable housing component of the project, which is to be developed and owned by People's Self-Help Housing, a nonprofit agency. The applicant anticipates development impact fee reductions will be reflected in Conditions of Approval and will ultimately be approved by the City Council.
- 2. Architectural Review Board:** It is understood that once the project application is deemed complete, it will be scheduled for review by the Architectural Review Board (ARB). And, at least two weeks prior to the ARB hearing date, story poles must be installed and certified. A story pole plan based on the architectural and civil plans that reflects the reduced elevations of the residences is forthcoming.
- 3. Submitted Reports and Studies:** It is understood that as the proposal moves through the environmental review process, various submissions will be reviewed in detail and may need modifications or revisions.
- 4. Tree Removal:** This Advisory notes that the proposed project includes the removal of up to 110 of the 144 trees mapped on site. Please keep in mind that, as discussed in the submitted arborist report, approximately 94 of the trees proposed for removal are non-native tamarisk and eucalyptus trees along the western property. Most of these trees are rare, unsightly, in very poor condition, non-native, and invasive. Several of the blue gums along this property edge have been topped as well. Consistent with

General Plan/Local Coastal Plan, the area along this edge where trees are being removed will be re-landscaped with appropriate native trees and shrubs to provide higher habitat value and enhance screening along the western edge.

Also note that trees 11 and 133 are now proposed to be retained. Enclosed please find an Addendum to Arborist Report prepared by Jan Scow Consulting Arborist dated 6/22/23 which reflects this change.

5. **Tribal Cultural Resources Consultation:** Advisory noted in that once the project application is deemed complete, the City will initiate the AB52 consultation process with local Tribal representatives for their input on any Tribal Cultural Resources that may be impacted by the project.
6. **Local Coastal Plan Amendment:** Advisory noted and it is understood that the proposed amendments to the Local Coastal Plan, including to the Carpinteria Bluffs Coastal Access, Recreation, and Open Space Master Program, will be thoroughly reviewed once the application is deemed complete for processing.
7. **Department/Agency Letters:** Advisory noted; the following departments/agencies have submitted the attached comments and/or condition letters to date:
  - Vince Semonsen, City Biologist (email), dated February 15, 2023.

Enclosed please find a Revised Biological Resources Assessment dated April 2023, prepared by Dudek and a Memorandum titled "Response to the City of Carpinteria's Comments on the Biological Resources Assessment Report" dated April 26, 2023 prepared by Dudek. The Memorandum is in response to the email from the City's biologist Vince Semonsen dated 2/15/23. In his comments, Mr. Semonsen indicated that overall, he had no issues with the submitted Biological Resources Assessment. The Memorandum addresses the following based on Mr. Semonsen's comments:

- Slender salamanders, chorus frogs, and gopher snakes are not protected species. While the habitat is poor for these species, they do have the potential to occur on the project site. Section 4.3.2 of the Revised Biological Resources Assessment has been revised to indicate that these species may occur on the project site.
- Coyote, gray fox, and red fox are common in the region and not subject to special protection. Section 4.3.4 Revised Biological Resources Assessment has been revised to include discussion of the potential for coyote and red fox to occur on the project site. Dudek believes that, while gray fox may have potential to occur, it is relatively unlikely to occur there regularly.
- Appendix E of the Revised Biological Resources Assessment has been revised to reference certain locations of occurrences of California red-legged frog and California newt (Lillingston Canyon). Regardless of this revision, neither species has the potential to occur on the Project site.

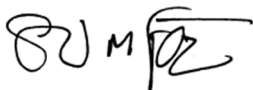
- Based on information Mr. Semonsen has provided, Dudek has added to Appendix E that the nearest known location of western pond turtle is Carpinteria Creek immediately south of Carpinteria Avenue, approximately 0.4 mile west of the Project site. However, western pond turtle still has a low potential to occur on the Project site even when in upland habitats, due to the extensive development between the site and Carpinteria Creek and the generally low quality of the site as upland habitat.
- Dudek has added the nearest location for tidewater goby and steelhead, both of which are federally listed fish species, to Appendix E. As Mr. Semonsen notes, this location is Carpinteria Creek, which is federally designated critical habitat for both species. No habitat occurs on the project site, as noted in Appendix E, and neither species has potential to occur there.
- Mr. Semonsen does not state that listed fairy shrimp have been found on the Rincon Bluffs, but poses this possibility as a question to the City. Section 4.4.3.4 of the Report not only described the negative results of surveys on the project site in 2021-2022, and concurrence with past assessments that the species is unlikely to occur on the site, but also noted that neither vernal pool fairy shrimp nor other federally listed species of branchiopods had been recorded on the south coast.
- Carpinteria Valley Water District Intent to Serve Letter, dated February 23, 2023; **no response necessary at this time.**
- Carpinteria Valley Water District Condition Letter, dated February 23, 2023; **no response necessary at this time.**
- Carpinteria Sanitary District, dated February 24, 2023; **no response necessary at this time.**

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Please feel free to contact me at (805) 966-2758 x 101 or stevef@sepps.com if you have any questions or clarifications are needed. I trust this resubmittal addresses your requests for information and the application may now be deemed complete. We anticipate next steps will be coordinating an ARB hearing date and commencing environmental review. Our team is excited to move forward.

Sincerely,

**SUZANNE ELLEDGE PLANNING & PERMITTING SERVICES, INC.**



Steve Fort  
Senior Planner