



12 October 2023

Syndi Souter, Associate Planner  
Community Development Department  
City of Carpinteria  
5775 Carpinteria Avenue  
Carpinteria, CA 93103-2603  
Email: SyndiS@carpinteriaca.gov

**Subject: Response to 8/18/23 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 August 18, 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.

The following project description has been updated to reflect the following:

- The residential portion of the project consists of a 100% affordable dwelling unit development (restricted to qualifying renters who earn between 30% and 60% of the median income for Santa Barbara County - low and very low-income households), which qualifies the project for certain development standards and reductions under state density bonus law. As noted in Government code section 65915(b)(1), any housing development project that provides a specified minimum percent of total units as affordable housing may utilize parking ratios as described in section 65915(p) as well as incentives, concessions, waivers and reductions as described in sections 65915(d) and (e), if requested by the developer.
- As the Project is providing 100% of its total dwelling units as either low and very-low income housing, the Project is entitled, per state law, to utilize parking ratios provided by state density bonus law. The project is requesting to utilize the parking ratio provided in Government Code section 65915(p)(1). Under state law, if requested by the developer for a qualified housing development project, the City "shall not require parking that exceeds the following ratios":

1 Bedroom	1 space
2 Bedroom	1.5 spaces
3 Bedroom	1.5 spaces

The project is proposing 52 parking spaces for the residences (the parking layout was reviewed since the last submittal and an additional space has been accommodated). Following is a summary of parking required based on unit types proposed and Density Bonus law parking requirements:

Unit Type	Number of Units By Type	Spaces Required by DBL per Unit	Spaces Required by DBL
1 Bedroom	20	1	20
2 Bedroom	10	1.5	15
3 Bedroom	11	1.5	16.5
<b>Total Spaces Required by DBL</b>			<b>51.5</b>

As a reminder, the intention is that People's Self-Help Housing will purchase the parcel being created for the residences once the project is entitled, and will then develop, own, and operate the for-rent residences. The number of proposed parking spaces has been vetted with People's Self-Help Housing.

- Gross and net square footages are indicated. Though certain square footages have been updated as requested, building footprints have not changed since the previous submittal. Note that certain gross building areas have been updated to include square footage that was previously included in statistics for Hotel Exterior Areas.
- An approximately 1,000 gross square foot building for equipment related to greywater processing has been added to the plans (Building N - south of the residences and northeast of the Farm Building on the site plan; elevations and floor plan are included on Sheet AN.100).
- An at grade pedestrian crossing is indicated in the location where the informal crossing currently exists. The crossing is noted to include a barricade arm and audible alarms that would operate to block the crossing when trains approach without interfering with train passage. The crossing would also include, if feasible, improvements to allow access by wheelchairs.

## PROJECT DESCRIPTION (Updated)

### Project Request

The Farm Preserve & Bungalows Project is requesting Development Plan, 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 applicant is requesting to apply parking ratios pursuant to state Density Bonus Law to the 100% affordable residential portion of the project, which qualifies the project for minimum parking ratios pursuant to Government Code section 65915(p)(1).

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.

### **Density Bonus Parking Reduction**

The applicant is requesting a reduction of parking requirements applicable to the residences, which are proposed to be 100% affordable (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 request is consistent with Density Bonus law parking requirements, which stipulate that the City shall not require parking that exceeds the following ratios for project that provides an appropriate percentage of affordable dwelling units:

1 Bedroom	1 space
2 Bedroom	1.5 spaces
3 Bedroom	1.5 spaces

The project is proposing 52 parking spaces for the residences. Following is a summary of parking required based on unit types proposed and Density Bonus law maximum parking requirements:

Unit Type	Number of Units By Type	Spaces Required by DBL per Unit	Spaces Required by DBL
1 Bedroom	20	1	20
2 Bedroom	10	1.5	15
3 Bedroom	11	1.5	16.5
<b>Total Spaces Required by DBL</b>			<b>51.5</b>

### 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 Bluffs 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 178,714 gross square feet (SF) of structural development on the northern portion of APN 001-170-013 (this includes attached porches and balconies); no development is proposed on the 4.13-acre southern parcel, APN 001-170-010. Approximate square footage is summarized as follows:

<u>Use</u>	<u>Gross Square Feet</u>	<u>Net Square Feet</u>
Retreat	100,460	60,540
Retreat – Exterior Areas	9,895	9,895
Residential	47,408	34,552
Event Barn	7,388	5,153
Farm Stand	600	391
Farm Building	2,112	1,681
Restaurant	10,851	6,971
<b>TOTAL</b>	<b>178,714</b>	<b>119,093</b>

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

- Lodges: 59 keys with approximately 39,504 gross SF of total floor area;
- Bungalows: 41 single-story keys with approximately 34,776 gross SF of total floor area;
- Main Retreat Building: 7,413 gross 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: 3,027 gross SF;
- Wellness Building: 12,926 gross 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, 1,566 gross 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 47,408 gross SF (inclusive of a resident community center and a maintenance shed). The applicant is partnering with People's Self-Help Housing who will 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 2,112 gross SF of ancillary structures, including a farm office, garage/workshop, storage and distribution area, delivery and receiving area, compost area, and farm yard.

A 600 gross SF farm stand will offer produce from the property's farm to the public.

An approximately 10,851 gross SF public restaurant and bar is anticipated to provide 100 interior seats and an outdoor seating patio for approximately 40 people.



A 7,388 gross 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).

An at grade pedestrian railroad crossing is indicated in the location where it currently exists. The crossing is noted to include a barricade arm and audible alarms that would operate to block the crossing when trains approach without interfering with train passage. The crossing would also include, if feasible, improvements to allow access by wheelchairs.

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

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	52
Restaurant	35
Event Barn	16
Farm Building	10
Farm Stand	2

Employees	50
Bluffs Preserve Visitors	10
<b>Total</b>	<b>273</b>

The applicant is proposing to apply Density Bonus Law to the residential portion of the project, which qualifies the project for certain development standard reductions. The project is proposing 52 parking spaces for the residences, which accounts for a reduction in the number of parking spaces from 292 parking spaces required by the Zoning Code to the proposed 273 parking spaces, which incorporates parking ratios under state density bonus law. 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>	<b>47,000 cy</b>	<b>47,000 cy</b>

## **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:**

- Gross and net square footages are included in the project description on Sheet G.000.
- The Sheet Index on Sheet G.000 has been moved to the right side of the page.
- The number of proposed units is 41 (40 affordable rental units and 1 non-restricted manager's unit). Sheet G.000.2 has been updated accordingly.
- Elevations have been updated to accurately reflect finished floor and finished grade. Note that the finished floor and finish grade are not significantly different at certain buildings (including pool building, restaurant, main retreat building, and events building) because there are hardscape areas proposed on the exterior of those buildings.

Building heights are measured from average finished grade.

- Finished floor elevations have been verified between architectural, grading and sections and updates have been made as necessary.
- Proposed grading estimates are 47,000 cubic yards of cut and 47,000 cubic yards of fill.
- Sheet LT201 has been revised to indicate that no lighting is proposed to be installed along trails in the open space area.
- Vehicular trash truck routes to trash/recycling dumpsters are indicated on Sheet G.000.4. Please refer to the enclosed "will-serve" letter from E.J. Harrison & Sons, Inc.

### **2. Renderings/Perspective Elevations:**

As discussed at our meeting on September 13, 2023, we intend to submit additional renderings and perspective elevations prior to the first ARB hearing. We understand this will not remain an application completeness item.

### **3. Story Pole Plan:**

Please refer to the enclosed story pole plan. Story poles are indicated at each corner and at the end of each roof ridge of the structures the applicant, in consultation with City staff, intends to story pole. Note that the incorrect story pole plan was accidentally submitted with the previous submittal. If you have questions about the story pole plan,

please do not hesitate to contact me, rather than considering any outstanding questions or discrepancy as an application "incomplete" item.

#### **4. Trees #11 and #133:**

The landscape and civil plans have been updated to indicate that trees #11 and #133 are proposed to remain. Please refer to Sheets C.100, C.101, L101, and L102.

#### **5. "Blind" at Seal Observation Overlook:**

Please refer to the site plan and landscape sheets which indicate a vegetative landscape blind/screen, consistent with the Bluffs Master Program as follows:

- Designed to grow to a height of no greater than four feet and be pruned to increase density.
- Planted exclusively with locally native stiff spined shrubs such as lemonade berry, bush sunflower, coastal sagebrush, and California buckwheat.
- No fences or physical barriers are proposed.

#### **6. Railroad Crossing Options:**

Consistent with our meeting on September 13, 2023, plans have been updated to indicate an at grade pedestrian railroad crossing, including a barricade arm and audible alarm on both sides, located in the same location as the existing informal pedestrian crossing.

As discussed at our meeting, the impacts of constructing an undercrossing (or above-grade overcrossing) would very likely be significant and are inconsistent with other Coastal Plan Policies, as well as the ethos of the proposed project. Once the application is deemed complete, the applicant is amenable to providing a "high level analysis" of above and below grade crossing options for consideration in the anticipated EIR.

The applicant notes the City's responsibilities with regard to a crossing as identified in Bluffs Master Program Bluffs Area 1 Implementation Measure 2.

#### **7. Local Coastal Plan Amendment:**

Please refer to the enclosed document entitled Completeness Item 7 Policy Amendments, which identifies General Plan/Local Coastal Plan and Bluffs Master Program policies, implementation measures, and exhibits proposed to be amended by the

project. Existing policies/implementation measures/exhibits, proposed amendments, and respective justifications are provided.

## **8. Grey Water Collection and Treatment System:**

Please refer to Sheet G.002.2 indicating the location of a structure to house grey water collection and treatment system equipment and Sheet AN.100 that indicates a plan view and elevations. The structure is identified as Building H and is included in relevant statistics.

The greywater treatment system is currently intended to be a packaged Aqualoop system model 9xGW5400L by Ecoviv. The treatment system will provide 12,000 GPD of average daily capacity. The system will consist of nine (9) 1,325-gallon bioreactor tanks and six (6) 1,325-gallon finished water holding tanks. The dimensions of each tank are 94" L x 53" W x 84" H. Greywater is treated by the Aqualoop system as follows: greywater passes through a prefilter, then flows into a tank where it is aerated before passing through the additional filtration.

Grey water is proposed to be used for landscape irrigation, and not for agricultural irrigation. A specification sheet is enclosed.

## **9. Traffic Study:**

Please see the enclosed updated Transportation Impact Analysis prepared by Dudek dated September 2023. The analysis has been updated to include the application for a mixed-use project at 6380 Via Real in the cumulative impact analyses. There were no changes to the overall study findings.

## **10. Tentative Parcel Map:**

Enclosed as Sheet C6.00 please find a Tentative Parcel Map updated to address first review comments provided by MNS dated September 6, 2023.

## **11. Electronic Copies:**

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

## **Advisory Information**

- 1. Development Impact Fees:** Advisory acknowledged. 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:** Advisory acknowledged. 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.
3. **Parking Modification Request:** As discussed above and incorporated into the project description above, the applicant is proposing to apply Density Bonus Law to the residential portion of the project. This qualifies the project for certain development standards including a reduced minimum parking ratio. Applicant is requesting minimum residential parking ratios consistent with Density Bonus law, which stipulate that the City shall not require more than the parking ratios provided in Government Code section 65915(p)(1).

It is understood a Parking Management Plan may be required as a Condition of Approval.

4. **Low-Cost Visitor Accommodations:** Advisory acknowledged. The applicant is anticipating proposing to pay a lower-cost visitor accommodation in-lieu fee commensurate with provision of 15% of the hotel room total. The applicant has identified 15% as consistent with the lower-cost overnight accommodation condition adopted by the City Planning Commission for the Via Real Hotel at 4110 Via Real on April 3, 2023.

It is understood that as the project moves forward through the review process, the appropriate in-lieu fee will be determined.

5. **Visual Impacts From Interior Lights:** Advisory acknowledged and it is understood the potential impacts of light trespass affects on adjacent public open space and environmentally sensitive habitat will be analyzed as processing moves forward. We anticipate being able to readily demonstrate that potential light trespass will not be an issue when extensive proposed landscaping, lack of a significant number of windows and doors facing areas of potential concern, buildings limited to 2-stories, and distance are considered.

Please note, the single-story restaurant building is proposing no windows on the east elevation, the single-story farm building is proposing two small windows on the east elevation, and the single-story pool building is proposing two small windows on the east elevation. There is not a significant number of windows directed to the east or south (also note the 200-foot setback from hotel bungalow buildings to the railroad tracks).

6. **Environmental Review:** Advisory acknowledged. The applicant is amenable to an applicant-prepared draft EIR for City peer-review and certification as part of the project public review process. We believe this would be the most effective and efficient process, providing the City with full review and opportunity for revisions,



added analysis where needed, etc. As discussed at our meeting on September 13, 2023, Dudek environmental consultants, who have prepared most the project's technical studies for City peer review, would also prepare the Draft EIR for City review.

**7. Coastal Appeals Jurisdiction:** Advisory acknowledged.

**8. General Plan/Coastal Plan Policy Consistency:** Advisory acknowledged. Please refer to the Policy Consistency Analysis provide with the initial application submittal and the enclosed document entitled Completeness Item 7 Policy Amendments. It is understood that as the project moves forward through the review process, there is the potential that additional revisions and/or mitigation measures may be considered and deemed necessary to achieve policy consistency.

**9. Department/Agency Letters:** Advisory acknowledged; the following departments/agencies have submitted the attached comments and/or condition letters to date:

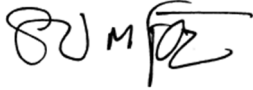
- Carpinteria Valley Water District Intent to Serve Letter, dated February 23, 2023; **no response necessary at this time.**
- Carpinteria Valley Water District Condition Letter, dated February 23, 2023; **no response necessary at this time.**
- Carpinteria Sanitary District, dated February 24, 2023; **no response necessary at this time.**
- SB County Air Pollution Control District, dated March 8, 2023; **no response necessary at this time.**
- Carpinteria-Summerland Fire Protection District, dated March 9, 2023; **no response necessary at this time.**
- City of Carpinteria Public Works Department, dated May 31, 2023; **no response necessary at this time.**

■ ■ ■

We trust this resubmittal addresses your requests for information and the application may now be deemed complete. **Please do not hesitate to contact me at (805) 966-2758 x 101 or [stevef@sepps.com](mailto:stevef@sepps.com) if you have any questions or if clarifications are needed. We would appreciate the opportunity to work with you as necessary to address any unforeseen items or calculations and avoid another incomplete determination.**

Sincerely,

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

A handwritten signature in black ink, appearing to read 'SUF', with a stylized flourish at the end.

Steve Fort  
Senior Planner