

**COUNTY OF SANTA BARABARA
PLANNING AND DEVELOPMENT**

MEMORANDUM

TO: Board of Supervisors

FROM: Glenn Russell, Ph.D, Director *by D. Black*

DATE: October 16, 2015

HEARING
DATE: October 20, 2015

RE: Eastern Goleta Valley Community Plan, Departmental Agenda Item #1

The purpose of this memo is to (1) address the Environmental Defense Center (EDC) letter dated October 9, 2015 (included as Attachment 1 to this memo) regarding the analysis of the More Mesa property in the Eastern Goleta Valley Community Plan EIR, and provide proposed revisions to the EIR; and (2) provide minor amendments to Program PRT-EGV-3A relating to Goleta Beach County Park, and provide minor amendments to Policy PRT-EGV-7.6 and add Action PRT-EGV-7C relating to the San Marcos Foothills Preserve.

More Mesa Comment Letter

The EDC letter expresses concern that the Eastern Goleta Valley Community Plan EIR classified potential impacts to biological and aesthetic/visual resources that could result from development of the More Mesa property as Class II (significant but mitigable) while the 1992 Goleta Community Plan EIR classified those impacts as Class I (significant and unavoidable). Further, the EDC letter states that P&D staff indicated that this reclassification of impacts was an error.

Based upon staff's review of the issues raised by the EDC, staff found the following two errors: (1) the executive summary impact table (Table S-1) in the EIR incorrectly summarized the land use compatibility impacts to include reference to "biological resources and aesthetic character" (see row 6, page S-13 of Table S-1) and (2) the executive summary impact table incorrectly summarized the aesthetics/visual resources impacts to include reference to "biological" impacts (see row 1, page S-19 of Table S-1).

The EIR Revision Letter 2 (RV 02) (included as Attachment 2 to this memo) corrects the executive summary impact table to address these two errors and clarifies the approach and use of the program EIR for environmental review for future development proposals at More Mesa. The EIR Revision Letter deletes the reference to "biological resources and aesthetic character" in the land use

compatibility impact summary and deletes the reference to “biological” impacts in the aesthetics/visual resources impact summary, consistent with the analysis of the issues in the main body of the EIR. As shown and discussed in further detail in the EIR Revision Letter 2, the land use compatibility and aesthetics/visual resources sections of the executive summary impact table should be revised because the analyses of the impacts in those EIR sections themselves did not discuss such impacts; therefore, the summary of the substance of the EIR is incorrect. The land use and aesthetics/visual resources EIR sections and the executive summary impact table correctly identified land use compatibility and aesthetics/visual resources impacts as Class II and staff does not recommend any changes to those conclusions.

Biological impacts for development of More Mesa are considered as part of the buildout of the plan and are indentified as Class I (significant and unavoidable). The references to two mistakes in the executive summary impact table related to land use compatibility impacts and aesthetics/visual resources impacts discussed above were the errors that P&D staff admitted to that the EDC referenced in its letter. As noted above, staff recommends changes to correct those errors. Staff does not recommend any changes to the impact levels identified for biological resources in pages S-24 through S-28 of the executive summary impact table, which includes a number of Class I impacts. However, the EIR Revision Letter 2 does clarify that the biological impact analysis of the Urban Area includes land within the Coastal Zone.

Classification of aesthetic/visual impacts of development of the More Mesa property as Class II was not an error. The 1992 Goleta Community Plan classified aesthetics/open space impacts of development of More Mesa as Class I; however, as discussed below, a different buildout is now analyzed and different policies are applicable.

The 1992 Goleta Community Plan EIR classified aesthetics/open space impacts of development of More Mesa as Class I. (GCP EIR, page V.F-13, Table V.F-3; page V.F-15.). That conclusion was based on buildout of 106 units, scattered over the More Mesa property. (GCP EIR, page III-15, Table III-1.) To reduce the impact, but not below a level of insignificance, the 1992 EIR recommended the following mitigation measure (F-18) that required:

New development on More Mesa shall be clustered to minimize disruption of views from areas of high public use. New development shall utilize low profile construction, earthtone colors and landscape screening to further minimize visual disruption of More Mesa. (GCP EIR, page V.F-19.)

This mitigation measure became DevStd LUDS-GV-1.7 and DevStd LUDS-GV-1.10 that were ultimately made applicable to the More Mesa property under the Goleta Community Plan and are proposed to continue to be applicable under the EGVCP. The 1992 EIR also considered reductions in allowable buildout at the More Mesa property: (1) Alternative A analyzed 50 units, and (2) Alternatives B and C analyzed 30 units. (GCP EIR, page VIII-11.) Analysis of these reduced-

development alternatives concluded that they reduced impacts to aesthetics/open space, but that the impact remained Class I. However, the Class I impact identified in the Alternatives was for a cumulative, Plan-wide buildout, not for the impact of the reduced-development options at More Mesa specifically. (GCP EIR, pages VIII-28-29, VIII-36, and VIII-53.) Until the current analysis in the EGVCP FEIR, buildout of 70 units, clustered in the northeast area of the site has not been analyzed.

The buildout analyzed by the EGVCP FEIR consists of 70 units, clustered in the northeast area of the property, which is an entirely different project than that analyzed in the 1992 EIR. The EGVCP FEIR concludes that development of More Mesa results in a Class II impact in aesthetics/visual resources based on the reduced amount of development and the numerous additional policies proposed by the EGVCP that limit and guide future development. The new EGVCP policies are applicable Plan-wide, but would apply to development in More Mesa. The attached EIR Revision Letter clarifies the applicability of these policies and development standards. These new policies were not included or studied in the 1992 EIR. Staff continues to conclude that substantial evidence supports that the EGVCP results in a Class II impact to aesthetics/visual resources in More Mesa.

This EIR is a program EIR that analyzes the potential environmental impacts of the Eastern Goleta Valley Community Plan (EGVCP). Its analysis of More Mesa does not consider a specific project or include a project-level comprehensive analysis of all potential environmental effects on aesthetic, biological, or other sensitive environmental resources from full buildout at More Mesa based on the policies proposed in the EGVCP. As a result, future projects on More Mesa would require additional environmental review, which would likely consist of an EIR. The level of environmental impacts of future development proposals at More Mesa would be based on a detailed analysis of the specific project and environmental setting at the time of the subsequent analysis and would not be limited to those impacts identified in the program EIR. Future development at More Mesa could not rely solely on the Final EIR for the EGVCP.

Minor changes to the Plan

Attachment 3 includes the following minor changes to the Parks, Recreation and Trails section of the EGVCP:

- Modify Program PRT-EGV-3A to reflect the Coastal Commission's recent permit approval for Goleta Beach County Park.
- Modify Policy PRT-EGV-7.6 to clarify that ultimately 10 acres of the San Marcos Foothills Preserve property is to be developed and managed as a passive park.
- Add Action PRT-EGV-7C to state the goal to prepare a Park Master Plan and develop a passive park on 10 acres of the San Marcos Foothills Preserve as funds become available.

Revised Recommended Action

Staff recommends that the Board of Supervisors take the following actions:

- a) Make the required findings for approval, including CEQA findings, in Attachment 1 to the Board Agenda Letter, 10/20/15, revised to include the EIR Revision Letter 2 (RV 02) dated 10/20/15 (Attachment 2 to this 10/16/15 memo to the Board) throughout wherever the findings refer to the Final EIR and the EIR Revision Letter 1 (RV 01).
- b) Certify the Eastern Goleta Valley Community Plan Final Environmental Impact Report (County Environmental Document No. 14EIR-00000-00005, State Clearinghouse No. 2012091048) (Attachment 2 to the Board Agenda Letter, 10/20/15), including the EIR Revision Letter 1 (Attachment 3 to the Board Agenda Letter, 10/20/15) and EIR Revision Letter 2 (Attachment 2 to this 10/16/15 memo to the Board), and adopt the Mitigation Monitoring and Reporting Program, attached to EIR Revision Letter 1.
- c) Adopt the Eastern Goleta Valley Community Plan (Attachment 4 to the Board Agenda Letter, 10/20/15) by taking the following actions:
 - i) Adopt a Resolution amending the text and maps of the Land Use Element (Case No. 14GPA-00000-00019) of the Santa Barbara County Comprehensive Plan (Attachment 5 to the Board Agenda Letter, 10/20/15) revised by Attachment 3 to this 10/16/15 memo to the Board of Supervisors;
 - ii) Adopt an Ordinance amending the zoning regulations of the County Land Use and Development Code (Case No. 11ORD-00000-00015), Section 35-1 of Chapter 35, Zoning, of the Santa Barbara County Code (Attachment 6 to the Board Agenda Letter, 10/20/15);
 - iii) Adopt an Ordinance amending and adding new zones and overlay zones to the County Zoning Map (Case No. 11RZN-00000-00002) of the Santa Barbara County Land Use and Development Code (Attachment 7 to the Board Agenda Letter, 10/20/15);
 - iv) Adopt a Resolution amending the text and maps of the Coastal Land Use Plan (Case No. 14GPA-00000-00018) of the Santa Barbara County Local Coastal Program (Attachment 8 to the Board Agenda Letter, 10/20/15);
 - v) Adopt an Ordinance amending the zoning regulations of the Article II Coastal Zoning Ordinance (Case No. 13ORD-00000-00011) of Chapter 35, Zoning, of the Santa Barbara County Code (Attachment 9 to the Board Agenda Letter, 10/20/15); and
 - vi) Adopt an Ordinance amending the Article II Coastal Zoning Ordinance of Chapter 35, Zoning, of the Santa Barbara County Code by amending the existing Goleta Community Plan Zoning South map, the Goleta Community Plan Zoning Overlay map, and the Goleta Community Plan Environmentally Sensitive Habitat and Riparian Corridor Land

Use and Zoning Overlays South map and adopting the new Eastern Goleta Valley Community Plan Zoning map, the Eastern Goleta Valley Community Plan Zoning Overlay map, and the Eastern Goleta Valley Community Plan Environmentally Sensitive Habitat and Riparian Corridor Land Use and Zoning Overlays map (Case No. 15RZN-00000-00004) (Attachment 10 to the Board Agenda Letter, 10/20/15).

Attachments:

1. Environmental Defense Center letter, dated October 9, 2015
2. EIR Revision Letter 2 (RV 02), dated October 20, 2015
3. Minor Changes to the Eastern Goleta Valley Community Plan, dated October 20, 2015