I. RECOMMENDATION

Staff recommends that the Planning Commission consider and forward a recommendation to the City Council for adoption of:

1) A Resolution of the Council of the City of Santa Barbara adopting environmental findings pursuant to the California Environmental Quality Act (CEQA) and approving a General Plan Map Amendment (MST2018-00070) to remove land use designations on the adopted General Plan Map in the Coastal Zone and retitle the modified map as “General Plan Map for Inland Areas.

2) A Resolution of the Council of the City of Santa Barbara adopting environmental findings pursuant to the California Environmental Quality Act (CEQA) and approving a LCP Amendment (MST2018-00070) that shall not take effect until it has been certified by the California Coastal Commission to: 1) Repeal the existing LCP Land Use Plan (entitled “Local Coastal Plan”; originally certified by the CCC in 1981 and subsequently amended by the City of Santa Barbara City Council and CCC) in its entirety and approve a new LCP Land Use Plan entitled “Coastal Land Use Plan”; and 2) Repeal the existing LCP Land Use Plan Map and approve a new LCP Land Use Map, which includes various land use designation changes.

II. BACKGROUND

This Planning Commission staff report includes background information that was previously provided in the February 15, 2018 Planning Commission staff report and most of the previously attached exhibits to provide the full public record. The February 15, 2018 Planning Commission staff report and all exhibits to that report are available at http://www.santabarbaraca.gov/LCP and in the Community Development Office at 630 Garden Street. The discussion section of this staff report has expanded to describe the General Plan Map Amendment and LCP Amendment in greater detail for additional clarity.
Local Coastal Program Background

The California Coastal Act (Coastal Act) of 1976 creates a partnership between the state and local governments to manage shoreline public access, recreation, sensitive habitats, scenic views, and other resources by regulating proposed development within the Coastal Zone. The Coastal Act requires all local governments located within the Coastal Zone to prepare a Local Coastal Program (LCP), which is defined as “a local government’s land use plans, zoning ordinances, zoning district maps, and, within sensitive coastal resources areas, other implementing actions, which, when taken together, meet the requirements of, and implement the provisions and policies of [the Coastal Act] at the local level.” The LCP serves as the standard of review for Coastal Development Permits (CDPs) under the City’s jurisdiction within the Coastal Zone. Under the Coastal Act, “development” is broadly defined and includes, among other things, activities such as: demolition, construction, replacement, or changes to the size of a structure; divisions of land; and activities that change the intensity of use of land or public access to coastal waters. All LCPs and any subsequent amendments to LCPs must not only be approved by local governments, but must also be certified by the California Coastal Commission (CCC).

The City’s LCP consists of a Coastal Land Use Plan (LUP), originally certified by the CCC in 1981 and subsequently amended through 2004, and an Implementation Plan (IP) that was originally certified in 1986 (available at http://www.santabarbaraca.gov/LCP and in the Community Development Office at 630 Garden Street). The Coastal LUP designates land uses and includes planning policies and programs that implement the Coastal Act’s overarching goals: protection, enhancement, and balanced use of coastal resources; maximization of public access to the coast; and prioritization of coastal-dependent and coastal-related uses. The IP includes detailed zoning and implementing ordinances found in the Municipal Code and other guidelines that carry out the policies of the Coastal LUP. Together, these serve as the standard of review for CDPs.

In 2013, the Planning Division initiated a work effort to update the City’s LCP. The primary goals of this overall major work effort are to:

1. Modernize the 1981 Coastal LUP. The 1981 Coastal LUP incorporates, by reference, policies from many documents, including policies of the General Plan as it existed in 1980. Over time, this structure has created complications in determining when LCP Amendments are required and the appropriate standard of review for CDPs. One of the major goals of the LCP Update is to modernize the 1981 Coastal LUP and fix this problem by making the Coastal LUP a stand-alone document.

2. Incorporate the 2011 General Plan land use and policy changes that are applicable in the Coastal Zone into the LCP and add policy guidance in certain emerging and controversial issue areas (e.g., development near coastal bluffs and the shoreline, protection of biological resources and creeks, and preservation of lower-cost visitor-serving accommodations).

A lack of detailed guidance in the existing 1981 Coastal LUP in some areas has led to significant workload for staff, Planning Commission, and City Council. It has also led to uncertainties for applicants as to the exact interpretation of standards that the City, and the CCC on appeal, will use to review CDP applications.
3. Address sea level rise (SLR) vulnerability and adaptation. As a result of climate change, SLR is occurring, and the physical risks to Santa Barbara’s Coastal Zone include, but are not limited to, shoreline erosion and degradation, amplified storm surges, and permanent inundation. Policies in the 2011 General Plan direct the City to further study the potential impacts of SLR and prepare a SLR Adaptation Plan. The CCC also now requires that LCPs address SLR vulnerability and adaptation strategies, and that proposed development be evaluated for SLR impacts. There is a need for the City staff, decision-makers, and the community to understand this emerging issue and all the associated risks, as well as a need for additional guidance and standards for coastal bluff top and shoreline development.

Grant Funding

The CCC’s LCP Local Assistance Grant Program provides funds to support local governments in completing or updating LCPs consistent with the Coastal Act. The City was awarded CCC LCP Local Assistance Grant Program grant funds from Round 1 and Round 3 of the program as described below.

Round 1 California Coastal Commission Local Coastal Program Local Assistance Grant Funds

In 2014, the City received a $123,000 grant from the CCC Round 1 LCP Local Assistance Grant Program to update the City’s LCP. Staff began work in February 2014 and the grant ended on April 29, 2016. Originally, the Round 1 grant funding required the City to submit to the CCC a locally approved Draft Coastal LUP by April 30, 2016. In February 2016, staff submitted a Preliminary Draft Coastal LUP to the CCC staff. However, City staff and the CCC staff agreed to delay the release of the Public Review Draft Coastal LUP based on extensive written comment received from CCC staff in April 2016 and unanticipated delays on other materials related to SLR. CCC staff encouraged the City to apply for the CCC’s Round 3 LCP Local Assistance Grant Program funds in order to continue working on the overall LCP Update program.

Round 3 California Coastal Commission Local Coastal Program Local Assistance Grant Funds

In 2016, City Council authorized staff to submit an application for grant funds from the CCC’s Round 3 LCP Local Assistance Grant Program. On August 12, 2016, the CCC awarded $285,892 in grant funds to the City for a public outreach plan for the draft Coastal LUP, a SLR Adaptation Plan, a Lower-Cost Visitor-Serving Accommodations Work Program, and for overall project management. The grant period began in January 2017 and ends in April 2019. Brief descriptions of the grant tasks are included in the Other Related LCP Work Efforts section below.

LCP Update Process

The overall LCP Update process began in 2013 and has involved extensive consultations with CCC staff, guidance from a City LCP Update Subcommittee, coordination with other City departments and with regional agencies, and public outreach. Exhibit A documents the LCP Update Meetings and Milestones from 2013 to June 2018, and some are described in greater detail below.
Both the Coastal Act and the California Code of Regulations (CCR) outline the process requirements for LCP Amendments. Specifically, CCR §13516 states that “to the extent possible” a local government shall coordinate (otherwise referred to as consultation) with the CCC staff to resolve issues with an LCP Amendment as to conformity and sufficiency with meeting the requirements of the Coastal Act. The consultation process occurs prior to formal submittal of an LCP Amendment to the CCC. Without the extensive consultation process, it is likely that the CCC will have a number of changes (i.e., “suggested modifications”) to the LCP Amendment in their review of the amendment for certification. Following the CCC hearing, the City Council decides whether to accept any suggested modifications required by CCC. If the City Council does not accept the CCC’s “suggested modifications,” either a series of public hearings can occur between the CCC and City Council in an attempt to resolve policy discrepancies, or the City’s LCP Amendment would remain uncertified by the CCC and have no effect in the Coastal Zone. Therefore, it is in the best interest of both the City and CCC to undertake extensive consultation up front prior to any hearings on the LCP Amendment. That consultation process is described below.

Since 2014, City staff has worked diligently and collaboratively with CCC staff to comprehensively update the Coastal LUP, as documented in Exhibit A (Meetings and Milestones). This consultation process included multiple meetings and 13 separate submittals of individual chapters and/or entire preliminary drafts of the Coastal LUP to CCC staff for review. Several staff changes at the regional CCC office in Ventura during the consultation process led to schedule delays.

The City submitted the first complete Preliminary Draft Coastal LUP to CCC staff on March 1, 2016. On April 29, 2016, the CCC staff provided extensive written comments on the Preliminary Draft Coastal LUP, including significant comments in the following issue areas (most of which have since been resolved or identified as a separate, future work effort):

- Requirements for future LCP Amendments in order for certain development projects to be approved;
- Clarifying when maintenance, repair, or additions to structures is so extensive as to constitute new development subject to all the development standards in the LCP;
- Parking requirements to protect coastal public access;
- Conditions for development near coastal bluffs and the shoreline;
- Requirements for development in shoreline hazard areas;
- Standards for creek and biological buffers and allowed uses in buffers;
- Limits on future upgrades to existing public water and wastewater infrastructure and limits on capacities of those systems;
- Requirements for mitigation fees for hotel/motel projects not considered lower cost; and
- Technical report requirements and interim policies addressing SLR.

Given the scope of the CCC staff comments, the planned public release of the Draft Coastal LUP and outreach effort that was scheduled to occur in summer 2016 was delayed. Instead, staff met with the City Administrator, the CCC’s Executive Director, and other CCC staff, to commit the
City and CCC to prioritizing release of a revised Draft Coastal LUP for public review. CCC staff also agreed to phase the LCP Update so that the Draft Coastal LUP would proceed while the SLR Adaptation Plan and Lower-Cost Visitor-Serving Accommodations Program are developed, processed, and certified on a separate schedule (described in further detail below).

Most of the CCC staff’s comments on the March 2016 Preliminary Draft Coastal LUP were addressed through further education and negotiation with CCC staff throughout 2016 and up to release of the Public Review Draft Coastal LUP in November 2017. In January 2018, CCC staff submitted written comments on the Public Review Draft Coastal LUP, most of which were subsequently addressed through policy clarifications and modifications. Additional written comments have been received from CCC staff since January 2018, including comments on parking policies in Chapter 3.1 Public Access and Chapter 5.1 Hazards submitted in May 2018. Many of those recent CCC staff comments were addressed in the June 5, 2018 Review Draft Coastal LUP (Exhibit B).

As of the date of this staff report, only a few issues remain unresolved with CCC staff, including:

- **Chapter 4.3 Water Quality:** Disagreement on whether all of the CCC staff model water quality policies which are designed for large project sites should apply to the small redevelopment projects captured by the City’s Storm Water Management Program. While the majority of the CCC staff model water quality policies have been incorporated into the Draft Coastal LUP, City Planning and Creeks Division staff believe a few of the CCC staff model requirements may not be feasible and/or would not likely improve water quality when applied to smaller redevelopment projects.

- **Chapter 5.1 Coastal Hazards:** Disagreement on whether existing major public roads should be factored into development standards and buffers for shoreline hazards given the potential impacts of sea level rise in the future. City staff believe we should assume that existing major public roads will remain in place until the issue is further studied as part of the SLR Adaptation Plan (see description below).

- **Chapter 5.1 Coastal Hazards:** Disagreement on whether all slope protection devices should be limited in the same way shoreline protection devices are limited. Slope stabilization devices are constructed features (e.g. retaining walls, sheet piles) that are used to stabilize slopes. Shoreline protection devices are those protection devices (e.g., seawalls, rock revetments, groins) that are subject to, or designed to protect structures from, erosion, flooding, and other impacts of waves and ocean currents. Shoreline protection devices have a higher potential to impact sand supplies, beach widths, and coastal access and, as such, should be limited in more situations than slope protection devices. This is consistent with policies of the Coastal Act which do not explicitly limit the use of slope protection devices, but do explicitly limit when shoreline protection devices can be used (Coastal Act Section 30235). Policies in the Draft Coastal LUP would limit the use of slope protection devices near bluffs to only those necessary to protect public accessways and existing principal, garage, and secondary habitable structures. CCC staff recommend prohibiting the use of slope protection devices near bluffs for existing garages and existing secondary habitable structures. City staff do not believe this proposal is appropriate given landowner concerns and the City’s other priorities to provide housing and off-street parking.
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- Chapter 5.1 Coastal Hazards: Disagreement about which “existing structures” are allowed to be protected with shoreline protection devices pursuant to Coastal Act Section 30235. The City Attorney and Planning staff have significant concerns with the CCC staff’s proposal to only consider protecting structures that existed before 1977.

- Other smaller wording changes to various policies.

LCP Update Subcommittee

In 2014, the LCP Update Subcommittee was formed, comprised of three members each of the Planning Commission, Parks & Recreation Commission, and Harbor Commission, to periodically meet with staff to review the Draft Coastal LUP approach, content, and format. Input from the Subcommittee members has been instrumental in preparing each version of the Draft Coastal LUP. In total, eight full LCP Subcommittee meetings were held between 2015 and 2017, as well as several meetings with each individual subcommittee.

City Inter-departmental Coordination

Throughout the LCP Update process, Planning staff continually checked in with other City staff from the Parks & Recreation Department, Waterfront Department, Public Works Department, City Administrator’s Office, and City Attorney’s Office. This ensured that the proposed policies and CCC staff suggested edits were supportable throughout the City organization.

Sea Level Rise Coordination

One of the conditions of the Round 1 and Round 3 CCC LCP Local Assistance Grant Programs is regional coordination of SLR work including early coordination meetings with other local jurisdictions, sharing technical analyses and lessons learned, and consideration of regional adaptation policies. This coordination began in 2014 and is detailed in Exhibit C. Staff coordinated with: Master’s Degree students from the University of California Santa Barbara (UCSB) Bren School of Environmental Science and Management; Santa Barbara County’s Coastal Resiliency Project; and participated in the Coastal Ecosystem Vulnerability Assessment (CEVA), a collaborative effort between California Sea Grant, UCSB’s Santa Barbara Coastal Long-Term Ecological Research Program, Scripps Institution of Oceanography, and the United States Geological Survey (USGS) Coastal Storm Modeling system.

Other Related LCP Work Efforts

The following is a description of other LCP-related work efforts that have been completed, are underway, or are anticipated in the future.

Post LCP Certification Permit and Appeal Jurisdiction Map

The CCC’s administrative regulations provide that a map depicting the areas of continuing CCC permit and appeal jurisdiction be adopted in conjunction with final LCP certification. The City’s prior Post LCP Certification Permit and Appeal Jurisdiction Map was certified in July 1991. In 2015, the CCC began working on a GIS-based version of the map for all jurisdictions. The CCC staff worked with City staff to refine the map, and the CCC certified the updated map on
Sea Level Rise Adaptation Plan

In 2016, the CCC awarded the City approximately $180,000 of the total $285,892 Round 3 CCC LCP Local Assistance Grant Program funds for preparation of a Sea Level Rise (SLR) Adaptation Plan. The SLR Adaptation Plan will build upon work completed to date, including existing-conditions analyses, vulnerability assessments, SLR modeling, and map creation. The plan will provide an updated vulnerability assessment that will be synthesized with an economic and fiscal analysis to identify the trade-offs of a range of sea level rise adaptation strategies. This work effort will include stakeholder involvement and public outreach, and will culminate in draft policies and development standards for inclusion in the City’s LCP and other planning documents. It is anticipated that a draft LCP Amendment in response to this work effort will be presented to the Planning Commission and City Council in late spring/summer 2019 and submitted to the CCC for certification thereafter.

Lower-Cost Overnight Accommodations Study

In 2016, the CCC awarded the City approximately $18,000 of the total $285,892 Round 3 CCC Local Coastal Program Local Assistance Grant Program funds for a study to analyze various strategies to preserve and encourage lower-cost visitor-serving accommodations. The Lower-Cost Overnight Accommodations Study will include a baseline inventory of overnight accommodations in and near the Coastal Zone, analysis of options to facilitate preservation and development of lower-cost overnight accommodations, and draft policy development. As with the SLR Adaptation Plan, this work effort will include stakeholder involvement and public outreach, and will culminate in draft policies and development standards for inclusion in the City’s LCP.

New Zoning Ordinance

The New Zoning Ordinance (NZO) was adopted by City Council in July 2017 and became effective outside of the Coastal Zone on October 1, 2017. Part of the NZO adoption included City Council Resolution No. 17-092 approving a LCP amendment for all proposed changes in the Coastal Zone associated with NZO. Until the NZO (Santa Barbara Municipal Code Title 30) is certified by the CCC, the Title 28 Zoning Ordinance (temporarily renamed “Coastal Zoning Ordinance”), will remain in effect in the Coastal Zone. The NZO-related LCP Amendment submittal to the CCC is planned to occur in 2019, after minor clean-up amendments to the NZO are processed through the local level.

Public Outreach

The original LCP Update scope of work envisioned building off the Plan Santa Barbara public outreach effort (spanning 2006 to 2011), integrating the 2011 General Plan and 2012 Climate Action Plan policies into an updated Coastal LUP, and ensuring the LCP reflects current conditions and conformance with the Coastal Act.
As a result of the consultation process with CCC staff, the scope of the LCP Update work effort significantly expanded to include what amounted to a comprehensive overhaul of the City’s Coastal LUP. Given this, staff determined that a more extensive public outreach program than originally anticipated was needed for the Public Review Draft Coastal LUP and a public outreach process was funded as part of the Round 3 CCC Local Coastal Program Local Assistance Grant Program. The City used the grant funds to hire a consultant to assist staff with drafting key messages, developing project-specific webpage content and design, preparing media and community relations releases and community presentations, and planning for a public open house to release the Public Review Draft Coastal LUP. Exhibit D details public outreach components conducted in preparation for the Open House and release of the Public Review Draft Coastal LUP in November 2017.

Comments on the November 2017 Public Review Draft Coastal LUP

The review period on the November 2017 Public Review Draft Coastal LUP ran 60 days after release, ending on January 11, 2018. At the close of the public review period, seven written comment letters were received. The City Creeks Advisory Committee and Harbor Commission submitted written comments generally supporting the policies of the Public Review Draft Coastal LUP. The Parks & Recreation Commission did not submit written comments. Other comments received mainly focused on biological resources and several comment letters expressed strong support for policies establishing buffers for creeks, wetlands, and environmentally sensitive habitat areas and for the SLR adaption planning effort. Staff consulted with other City Departments on the comments received and addressed most of them through policy modifications in the Draft Coastal LUP. All comments received on the Public Review Draft Coastal LUP, and responses to those comments, can be found at [http://www.santabarbaraca.gov/LCP](http://www.santabarbaraca.gov/LCP).

Public Hearings

March 2018 Planning Commission Hearing

On March 1, 2018, a Planning Commission hearing was held to consider and forward a recommendation to City Council for adoption of a General Plan Map Amendment and a LCP Amendment. Prior to the Planning Commission hearing, Commissioners were provided with an addendum to the February 15, 2018 staff report. The addendum included additional comment letters received between January 12 and February 26, 2018, topical responses to those comment letters, resulting corrections to the February 15, 2018 Planning Commission Staff Report, and additional changes proposed by staff to the March 2018 Planning Commission Review Draft Coastal LUP. In addition to the changes described in the addendum, Commissioners Lodge and Wiscomb provided staff with text and figure edits to the Draft Coastal LUP that generally provided clarifications or corrections.

At the March 1, 2018 hearing, the Planning Commission’s motion included forwarding the Commissioners’ comments and recommendations to City Council for adoption, with identified changes to the Coastal LUP, including changes outlined in the staff report addendum and clarifications to Policy 2.1-19 Nonconforming Development. The Planning Commission’s approved meeting minutes of March 1, 2018 are included as Exhibit E. The Planning Commission
April 2018 City Council Hearing

As directed by the Planning Commission, staff was prepared to forward the General Plan Map Amendment and LCP Amendment to City Council for adoption at a hearing originally scheduled for April 24, 2018. Several comment letters on the April 2018 City Council Review Draft Coastal LUP were received in advance of the planned City Council hearing (included in Exhibit F and also found at http://www.santabarbaraca.gov/LCP).

Prior to the scheduled City Council hearing, staff determined that mailed noticing for the LCP Amendment was not fully completed in compliance with the California Code of Regulations (CCR) §13515 Public Participation and Agency Coordination Procedures prior to the Planning Commission and City Council hearings. While there was a robust public outreach and noticing process including display ads, email notifications, and mailed notifications to public agencies, CCR §13515 requires United States Postal Service (USPS) mailed notices of the availability of public review drafts to interested parties who request mailed notices and public agencies at least six weeks prior to any final action on the LCP Amendment and at least ten working days before hearings on the LCP Amendment. Therefore, the hearing for this item scheduled on the April 24, 2018 City Council agenda was postponed.

The General Plan Map Amendment and LCP Amendment is now returning to the Planning Commission for a recommendation to City Council. Noticing is being conducted in accordance with CCR §13515 and local regulations. As described below in more detail, staff has taken this opportunity to further clarify the nature of the LCP Amendment and address any issues or comments raised by City staff, the public, or CCC staff since the March 1, 2018 Planning Commission hearing.

III. DISCUSSION

The proposed LCP Amendment includes consideration of the Draft Coastal LUP and amendments to the LCP Land Use Plan Maps, described in further detail below.

The June 5, 2018 Review Draft Coastal LUP (Exhibit B) is the culmination of a four-year work program and represents a complete rewrite of the City’s 1981 Local Coastal Plan as amended. The LCP Amendment includes repealing the existing certified LCP Land Use Plan as amended (called the 1981 Local Coastal Plan) and replacing it with a new LCP Land Use Plan (called the Coastal Land Use Plan or Coastal LUP). The 1981 Local Coastal Plan as amended and the proposed Draft Coastal LUP are both available at http://www.santabarbaraca.gov/LCP or in the City of Santa Barbara at the Community Development Department office at 630 Garden Street, the City Clerk’s Office at 735 Anacapa Street, and the Santa Barbara Central Library at 40 E. Anapamu Street, and the California Coastal Commission offices in Ventura and San Francisco. The LCP Amendment also includes changes to the LCP Land Use Plan Maps (see Exhibit G and the section below for more detail). Exhibit H includes draft resolutions that would be forwarded to City Council for consideration. Following approval by City Council, the new Coastal LUP and LCP Land Use Map would not take effect in the Coastal Zone until it is certified by the CCC.
and the City adopts a resolution concurring with the CCC’s resolution of certification, including any terms and modifications which may have been required for final certification.

The June 5, 2018 Review Draft Coastal LUP shows amendments in track changes format, as compared to the March 2018 Planning Commission Review Draft Coastal LUP. After the March 1, 2018 Planning Commission hearing, the draft Coastal LUP was amended by staff to: 1) incorporate amendments per the February 28, 2018 Addendum to the Planning Commission staff report; 2) incorporate amendments as directed in the Planning Commission’s motion of March 1, 2018; 3) incorporate amendments requested by City staff; 4) respond to public comments received after March 1, 2018 (Exhibit F); and 5) incorporate amendments resulting from continued consultation with CCC staff.

**Significant Amendments to the Draft Coastal LUP since March 2018**

The following describes substantive changes to the Draft Coastal LUP since the March 1, 2018 Planning Commission hearing. Additional minor corrections and clarifications have also occurred. Policy and figure numbers cited below are from the June 5, 2018 Review Draft Coastal LUP. All changes between the March and June versions of the document can be seen in strikeout and underline form in Exhibit B.

**Global Changes**

Global changes to the Draft Coastal LUP since March 2018 include changing the page numbering format to avoid confusion between page and policy numbers and adding language that states the Coastal Zone Boundary is shown for illustrative purposes only and does not define the Coastal Zone. The Post LCP Certification Permit and Appeal Jurisdiction Map for the City of Santa Barbara should be used to assess any jurisdiction or appeals decisions related to the exact location of the Coastal Zone Boundary.

**Changes to Specific Chapters**

- **Chapter 1.2 Santa Barbara’s Local Coastal Program** was amended to:
  - Clarify the relationship between Santa Barbara City College’s Long Range Development Plan and the Coastal LUP (included in the Planning Commission’s previous motion).
  - Add text describing the legal limitations that govern any conditions placed on any permit the City approves (at the request of Planning Commissioner Higgins, which was inadvertently not included in the Planning Commission motion).
  - Add text to clarify how findings should be made on CDPs (included in the Planning Commission’s previous motion).

- **Chapter 1.3 Santa Barbara’s Coastal Zone** was amended to:
  - Add text describing the history of the Douglas Family Preserve acquisition at the request of Planning Commissioner Lodge.
  - Amend the Component Area descriptions to clarify the episodic nature of bluff erosion and to better describe the mix of uses in the Funk Zone (included in the Planning Commission’s previous motion).
• Chapter 2.1 Land Use & Development was amended to:
  o Include the remaining public access and recreation policies of the Coastal Act as policies of the Draft Coastal LUP.
  o Clarify in Policy 2.1-3 Average Unit-Size Density Incentive Program that housing opportunities for moderate income categories are also encouraged as requested in a comment letter received in March 2018 from Allied Neighborhood Association.
  o Clarify in Policy 2.1-19 Nonconforming Development review procedures for additions and alterations to nonconforming development.
  o Change Policy 2.1-27 Substantial Redevelopment to address comments from CCC staff, City staff, and public comment letters. Changes include: including estuaries in the list of erosion areas requiring a stricter definition of substantial redevelopment, clarifying that the calculations pertain to structural elements of a structure, adding a process for determining substantial redevelopment, clarifying procedures for a lot partially located in potential erosion hazard areas, and reorganization of the policy.

• Chapter 3.1 Public Access was amended to:
  o Add the pedestrian paseo network to Figure 3.1-1 Transportation (included in the Planning Commission’s previous motion).
  o Change Figure 3.1-2 Key Public Access Parking Areas to better depict on-street parking (at the request of Planning Commissioner Higgins, which was inadvertently not included in the Planning Commission motion).
  o Delete text regarding the Funk Zone (included in the Planning Commission’s previous motion).
  o Add policies to ensure all the public access policies of the Coastal Act are included as policies of the Coastal LUP.
  o Edit several parking policies in response to further discussions between City and CCC staff that occurred in April and May 2018. Among other clarifications, details have been added to Policy 3.1-36 Evaluation of Permanent Reductions or Restrictions of Parking in Key Public Access Parking Areas to further address when a change in parking supply would require an evaluation of potential impacts to public access.

• Chapter 3.2 Visitor-Serving & Recreational Facilities was amended to delete text describing the City’s Municipal Code definition of “hotel” based on public comment at the Planning Commission hearing.

• Chapter 4.1 Biological Resources was amended to:
  o Add text regarding white-tailed kite roosting and foraging habitat, tidewater goby critical habitat, and western snowy plover critical habitat (included in the Planning Commission’s previous motion).
  o Change Figure 4.1-2 Potential Wildlife and Special Status Species Areas to map critical habitat areas (included in the Planning Commission’s previous motion).
  o Change text and Policy 4.1-41 ESHA Determinations that clarifies that both nesting and communal roosting habitat for white-tailed kite would be considered ESHA if found in the City.
  o Add a subsection to Policy 4.1-17 Development within Habitat Buffer Areas that prohibits new development and substantial redevelopment not allowed within ESHA, wetland, and creek habitat buffers to overhang or otherwise encroach into the buffers.
Change Policy 4.1-18 Reduction of ESHA, Wetland, and Creek Habitat Buffers at the request of Creeks and Planning Division staff to clarify the intent of the policy, define previously ambiguous language, define the specific amount (and in some cases, sizes) of development allowed on a lot when a reduction in habitat buffer is requested, require a planner consultation for any application requesting a reduction in minimum required habitat buffer, reiterate technical report requirements for requests for reductions in minimum required habitat buffers, make the policy more consistent with Policy 5.1-36 Reduction of Coastal Bluff Face and Coastal Bluff Edge Development Buffer Standards, and reorganize the policy.

- Chapter 4.3 Scenic Resources & Visual Quality was amended to:
  - Change text and Policy 4.3-27 Public Scenic Views and Scenic Resources Identification to clarify that public scenic views may be framed, wide angle, or panoramic corridors (included in the Planning Commission’s previous motion).
  - Add Policy 4.3-28 View Corridor that defines view corridors (included in the Planning Commission’s previous motion).

- Chapter 4.4 Cultural Resources was amended to delete previously numbered Policy 4.4-1 Archaeological and Paleontological Resources Identified by the State Historic Preservation Officer in response to further discussions between City staff and CCC staff.

- Chapter 5.1 Coastal Hazards was the topic of considerable additional discussions between City and CCC staff in April and May 2018. As a result of these discussions, the chapter was amended to:
  - Make several minor amendments to policies.
  - Add Policy 5.1-19 Adaptation in Development that requires new development and substantial redevelopment be designed to consider the potential impacts of sea level rise consistent with a similar policy included in the City’s Safety Element.
  - Include additional development standards for slope stabilization in Policy 5.1-23 Slope Stabilization and Protection.
  - Change Policy 5.1-33 Development Standards for Potential Shoreline Hazards Screening Area 4 (Coastal Bluff-Tops) to allow the substantial redevelopment, alteration, or relocation of existing public structures within Coastal Bluff Edge Development Buffers if several criteria are met.
  - Change Policy 5.1-35 Development Standards for Potential Shoreline Hazards Screening Area 6 (Inland Coastal Flooding Area) to require new development and substantial redevelopment to avoid high flood hazards where feasible and practical.
  - Change Policy 5.1-36 Reduction of Coastal Bluff Face and Coastal Bluff Edge Development Buffer Standards and Policy 5.1-37 Sea Ledge Lane to further define previously ambiguous language, further clarify the total amount of development allowed on a lot when a reduction of coastal bluff face and Coastal Bluff Edge Development Buffer standards is requested; require a planner consultation, reiterate technical report requirements, reorganize the policy, and make the policy more consistent with Policy 4.1-18 Reduction of ESHA, Wetland, and Creek Habitat Buffers.
Include a new subsection to Policy 5.1-42 *Conditions for Development in Shoreline Hazard Areas on the Interim Shoreline Hazards Screening Areas Map* that notifies landowners that public services to sites subject to hazards may not be maintained in perpetuity due to the impacts of sea level rise.

- Change Policy 5.1-43 *Shoreline Hazards Avoidance Preferred* to more closely reflect the requirements contained in 5.1-44 *Shoreline Protection Device Permitting* and to further discourage use of shoreline protection devices.

- Change the footnote on Policy 5.1-44 *Shoreline Protection Device Permitting* regarding the interpretation of “existing structures” that may be protected by new shoreline protection devices pursuant to Coastal Act Section 30235.

- Add a subsection to Policy 5.1-46 *Condition of Approval for Shoreline Protection Devices for Public Development* requiring reevaluation of the design and necessity of a shoreline protection device when the protected structure is substantially redeveloped.

- Move the definition of coastal bluff edge from Policy 5.1-69 *Location of Coastal Bluff Edge* to its own policy, Policy 5.1-54 *Coastal Bluff Edge Defined*.

- Clarify in Policy 5.1-57 *Expected Life of Development Defined* that 75 years is the expected life of all residential structures, not just single unit residences.

- Clarify in a number of policies that buffers to avoid shoreline hazards may be calculated with the assumption that existing public roads providing public access to and along the shoreline would be protected.

- Change Policy 5.1-69 *Location of Coastal Bluff Edge* to reorganize the policy, clarify further the standard of review for determining the location of coastal bluff edge on properties, and clarify how Figure 5.1-2 *Coastal Bluff Edge* should be used in reviewing development proposals; and

- Add topographic line and clarify notes on Figure 5.1-2 *Coastal Bluff Edge*.

- Chapter 7.1 Bibliography was completed.

**June 5, 2018 Review Draft Coastal LUP**

The following is an overall summary of the chapters contained in the June 5, 2018 Draft Coastal LUP (Draft Coastal LUP) and major differences between the proposed Draft Coastal LUP and the existing certified 1981 Local Coastal Plan as amended.

In addition to the differences described below by chapter, the Draft Coastal LUP also has a different structure than the 1981 Local Coastal Plan. The Draft Coastal LUP is a standalone document that, unlike the 1981 Local Coastal Plan, does not incorporate other documents by reference (e.g., the Harbor Master Plan and Circulation Element) into the plan. Rather, relevant policies from other documents have been incorporated in the Draft Coastal LUP where still applicable. While the Draft Coastal LUP carries forward many policies from the 1981 Local Coastal Plan, the policies in the Draft Coastal LUP are significantly more detailed and, in some cases, contain specific development standards. Much of the added detail documents criteria and interpretations that are used today in the review of CDP applications.
Introduction

Chapter 1.1: The Coastal Act, Chapter 1.2: Santa Barbara’s Local Coastal Program, and Chapter 1.3: Santa Barbara’s Coastal Zone

These chapters in the Draft Coastal LUP provide background and setting to inform the rest of the document and include descriptions and maps of the entire Coastal Zone divided into smaller Component Areas.

New policies document how to use the Draft Coastal LUP in the review of CDP applications and describe the relationship of the Coastal LUP to the Coastal Act, the General Plan, state and federal laws, and other agreements. A policy carried over from the 1981 Local Coastal Plan also addresses resolution of policy conflicts.

The Draft Coastal LUP also includes a new detailed policy addressing situations when full adherence to all LCP policies and standards may preclude a reasonable economic use of a lawfully created property. While the City has always had the ability to address situations of property takings in this way, the existing 1981 Local Coastal Plan provides limited direction on this issue.

Coastal Land Uses

Chapter 2.1: Land Use & Development

This chapter of the Draft Coastal LUP includes a reduced-scale version of the LCP Land Use Map (Figure 2.1-1 LCP Land Use Map) and overarching land use policies. The land use designations as depicted on the LCP Land Use Map are compatible with Coastal Act policies that encourage and protect visitor-serving uses (e.g., hotels, motels, parks, and Stearns Wharf), beach access and recreational uses, and coastal-dependent and related uses (e.g., the Harbor) as higher priority land uses in the Coastal Zone. The land use designations on the LCP Land Use Map serve as the General Plan land use designations in the Coastal Zone for the purposes of reviewing non-Coastal Development Permit applications.

The 1981 Local Coastal Plan discusses land use and development in the Housing and Locating New Development chapters. Although an LCP is not required to include housing policies and programs per Coastal Act Section 30500.1, at the time the 1981 Local Coastal Plan was being adopted, the City was also revising its Housing Element and several housing policies were included in the 1981 Local Coastal Plan to comply with the state’s Housing Element mandate. The Draft Coastal LUP updates those housing policies consistent with policy direction in the City’s 2011 General Plan. Both the 1981 Local Coastal Plan and the Draft Coastal LUP are focused on infill development.

New policies in the Draft Coastal LUP include definitions and procedures to be used in the development review process. These include definitions for terms such as Development, Repair and Maintenance, and Principal Structure that are consistent with those recently adopted by the City Council in Title 30 of the Municipal Code. The Draft Coastal LUP also includes new policies addressing alterations, repairs, and additions to legal nonconforming structures and for determining when an existing structure is redeveloped to a degree that is considered “substantial redevelopment.” Substantial redevelopment is treated the same as new development and requires
compliance with all the policies and provisions of the Coastal LUP. Projects located in areas subject to potential shoreline erosion hazards, wave impact hazards, and/or erosion hazards from creeks are subject to a stricter definition of substantial redevelopment to achieve conformance with the hazard-related policies of the Coastal LUP as soon as possible.

Chapter 2.2: Coastal-Dependent & Related Development
This chapter of the Draft Coastal LUP focuses mainly on the Harbor and Stearns Wharf as the City’s primary commercial and recreational oriented coastal-dependent and coastal-related development areas. The 1981 Local Coastal Plan’s Ocean Dependent Activities chapter sets the stage for developing the Harbor Master Plan to redesign and restructure the Harbor and Stearns Wharf facilities to address safety, use, and circulation issues. Most of the issues identified in policies of the 1981 Local Coastal Plan and the certified 1996 Harbor Master Plan have since been addressed. The policies in the Draft Coastal LUP, therefore, update and incorporate Harbor Master Plan policies that are still applicable for issuance of CDPs, and do not change current procedures or practices for the Harbor and Stearns Wharf facilities or uses.

Public Access & Recreation
Chapter 3.1: Public Access
One of the fundamental goals of the Coastal Act is to maximize public access to the shoreline, along the coast, and to coastal recreation areas. Generally, the City is already in alignment with the Coastal Act by providing abundant public access to the shoreline and along the coast and ample oceanfront land for recreational use. The policies of the Draft Coastal LUP, therefore, mostly confirm the City’s commitment to providing and protecting public access to and along the coast, including the California Coastal Trail and the City-owned public coastal bluff stairways to the beach.

The 1981 Local Coastal Plan’s Shoreline Access chapter focuses mainly on coastal bluff and beach access policies and referenced the City’s Circulation Element. The Draft Coastal LUP updates and incorporates the Coastal Zone portion of the City’s Circulation Element policies, which support a transportation system that achieves equality of convenience and choice among all modes of transportation, including increasing walking, bicycling, and transit as sustainable transportation modes.

Public parking is an important resource to the CCC staff as they see it as key to maximizing public access to and along the shoreline and coastal recreation areas. The 1981 Local Coastal Plan includes multiple references to weekend parking shortages, particularly in the Recreation and Public Services chapters, in relation to the extensive recreational use of the waterfront. Since the 1980s, new public parking lots have been constructed in and near the Coastal Zone and sustainable transportation modes for public access to and along the coast have greatly expanded City-wide. Nonetheless, during the extensive consultation period with CCC staff, maintaining public parking was a significant issue.

The Draft Coastal LUP has new policies to designate and preserve “Key Public Access Parking Areas” that provide public access to the shoreline, coastal recreation areas, Stearns Wharf, and the Harbor. The Key Public Access Parking Areas include public parking lots and some on-street parking in the Waterfront area and near public coastal bluff stairways and coastal recreation sites, as shown on Figure 3.1-2 Key Public Access Parking Areas. Proposed policies protect Key Public
Access Parking Areas by prohibiting parking restrictions or new parking programs or ordinances that would significantly impact public access to the shoreline or coastal recreation areas.

**Chapter 3.2: Visitor-Serving & Recreational Facilities**

Visitor-serving and recreational facilities are an important part of the character and economy of Santa Barbara. This chapter in the Draft Coastal LUP emphasizes protecting and encouraging lower-cost recreation and overnight accommodations to ensure that lower income members of the public, including those who live further inland, can afford to recreate and/or stay at the coast. Similar to the *Recreation and Visitor-Serving Commercial Uses* chapters of the 1981 Local Coastal Plan, the policies in the Draft Coastal LUP continue the City’s commitment to protecting recreational facilities and coastal areas for ocean- and water-oriented recreational use. One change since the 1980s is the visitation of cruise ships to the City in the off-season (September through June) and, correspondingly, the Draft Coastal LUP includes several new policies regarding cruise ships in order to minimize impacts on coastal access and coastal resources. Policies in the Draft Coastal LUP relating to lower-cost overnight accommodations are the same as in the 1981 Local Coastal Plan but are considered interim until a separate work effort is completed to determine how best to preserve existing and encourage new lower-cost overnight accommodations (described below under Other Related LCP Work Efforts).

**Coastal Resources Protection**

**Chapter 4.1: Biological Resources**

The Coastal Act provides strong protection for creeks, wetlands, and other habitats that are especially rare or valuable, referred to as environmentally sensitive habitat areas (ESHAs). This chapter in the Draft Coastal LUP includes policies to protect biological resources, encourage restoration, and clarify development standards for projects within or near creeks, wetlands, and ESHAs. The 1981 Local Coastal Plan *Water and Marine Environments* chapter includes only a few policies for general protection of biotic resources, creeks, and the Andree Clark Bird Refuge. In contrast, the policies of the Draft Coastal LUP provide detailed development standards and numeric habitat buffers so that property owners, staff, City decision-makers, the CCC, and the public know what to expect in that regard, to provide consistency and expediency in the review of coastal development permits at the local and state level, and to minimize appeals to the CCC.

The Draft Coastal LUP contains new policies that provide guidance on which habitats constitute ESHAs (e.g., riparian areas, creeks, wetlands, oak woodlands, and estuaries), how to determine the top of bank of creeks, and how wetlands are defined by the Coastal Act. New policies also outline allowed uses within creeks, wetlands, and ESHAs that expand upon those contained in the Coastal Act. Restoration is an allowed use and encouraged in creeks, wetlands, ESHAs, and habitat buffers.

The City’s 1986 LCP Implementation Plan includes creek guidelines (Local Coastal Plan Phase III – Implementation Creek Guidelines) that require minimum buffers of 25 feet from the top of bank of Mission Creek and Laguna Creek (called the Central Drainage Channel). Buffers for all other creeks are determined on a case-by-case basis. This existing process has led to a high degree of uncertainty and delays in the permitting process. The Draft Coastal LUP, therefore, contains numeric minimum habitat buffers for all the major creeks, wetlands, and ESHAs in the City’s Coastal Zone. The minimum required habitat buffers address creek erosion hazards and protect
ESHAs, consistent with the mandates of the Coastal Act. The size of the buffers are larger than those in the existing Implementation Creek Guidelines; however, the required buffers also consider the fact that the City is an urban landscape with limited options for moving existing structures significantly away from creeks and habitats. While the new minimum habitat buffers are intended to be achievable on the majority of properties, the Draft Coastal LUP also contains new policies that present a path forward for the limited situations where the required buffers cannot be met on severely constrained lots. New policies in this chapter also outline allowed uses and management measures (e.g., appropriate landscaping) within habitat buffers.

The Draft Coastal LUP also includes new policies to protect birds, wildlife, and beach habitats. New policies limit activities in areas used regularly by roosting western snowy plover and in the intertidal areas of the beach.

**Chapter 4.2: Water Quality**

The Coastal Act requires new development to be designed to protect the biological productivity and quality of coastal waters, streams, wetlands, and estuaries. This chapter in the Draft Coastal LUP addresses City planning efforts and programs to improve water quality, management of the harbor and other marine areas, wastewater facilities, and best management practices during construction. The 1981 Local Coastal Plan policies require adherence to the programs, plans, and policies of all governmental agencies, including those of the Regional Water Quality Control Board. This chapter in the Draft Coastal LUP carries forward that policy but with more specificity including detailed requirements for development to adhere to the City’s existing Storm Water Management Program, as well as other methods to protect and improve water quality.

**Chapter 4.3: Scenic Resources & Visual Quality and Chapter 4.4: Cultural Resources**

These chapters of the Draft Coastal LUP include policies to continue existing policy and protocols for protecting public scenic views, important visual resources, and archaeological and paleontological resources, with no significant change from the 1981 Local Coastal Plan’s *Visual Quality and Cultural Resources* chapters. The policies in the Draft Coastal LUP, however, provide more detailed development review criteria for projects within or near these resources.

**Coastal Hazards & Adaptation**

**Chapter 5.1: Coastal Hazards**

This chapter in the Draft Coastal LUP addresses natural hazards present in the coastal area of the City including geologic, seismic, erosion, flooding, wildfire, and shoreline hazards. The geologic, seismic, erosion, flooding, and wildfire hazards present throughout the City are addressed by policies in the City’s 2013 Safety Element and established protocols for evaluating proposed development in hazard areas. While the types of hazards described in the Draft Coastal LUP are similar to those evaluated in the *Hazard* chapter of the 1981 Local Coastal Plan, new policies in the Draft Coastal LUP address the exacerbation of shoreline hazards from sea level rise. The policies in the Draft Coastal LUP that consider the potential for increased shoreline hazards due to sea level rise are considered “interim” until the SLR Adaptation Plan is complete (see description of that work effort above in Other Related LCP Work Efforts).

Santa Barbara’s coastal bluffs and beaches are subject to beach erosion, coastal bluff erosion, coastal bluff slope failure, coastal flooding, and wave impacts that may substantially increase in
the coming years due to the effects of projected sea level rise. There are many existing homes, park and waterfront structures, and businesses along the shoreline that are important to the community. Slope and shoreline protection devices (retaining walls, gunite, sea walls, rock revetments, etc.) can effectively mitigate slope instability and wave damage in the immediate vicinity of a protection device. However, erosion continues to occur around these protection devices and they weaken over time, often failing during large storm events. These devices also prevent the coastal bluffs and shoreline behind the beach from naturally eroding, which reduces sand supply and beach widths. In order to preserve the scenic and walkable nature of the beaches and coastal bluffs and to minimize the risks of slope failures and erosion, the 1981 Local Coastal Plan requires new development to be set back from the shoreline and severely limits the use of shoreline protection devices. The Draft Coastal LUP continues this long-standing policy direction and includes significantly more detailed policies and development standards for shoreline hazards.

New policies in the Draft Coastal LUP identify areas of the coast potentially subject to beach erosion, coastal bluff erosion, coastal bluff slope failure, coastal flooding, and wave impacts now and in the future, factoring in the effects of sea level rise through the year 2100. The Interim Shoreline Hazards Screening Areas Map (Figure 5.1-1 Interim Shoreline Hazards Screening Areas) illustrates these areas and provides a visual tool to initially assess (i.e., screen) the potential for existing and future development to be subject to shoreline hazards. This visual tool and related policies factor in sea level rise data developed by the United States Geological Survey (CoSMoS 3.0) and used in the National Research Council’s 2012 document “Sea Level Rise for the Coasts of California, Oregon, and Washington: Past, Present, and Future.” New policies then provide direction on the need for technical studies and development standards in these potential shoreline hazard areas. The Draft Coastal LUP addresses redevelopment and situations where minimum required buffers and other development standards cannot be met on severely constrained lots. New policies also limit the use of slope and shoreline protection devices.

Determining a specific location for the coastal bluff edge has been challenging under the 1981 Local Coastal Plan. Identifying the bluff edge on a case-by-case basis, in response to development proposed on bluff top properties, can be particularly difficult. In September 2017, the CCC approved an updated Post LCP Certification Jurisdiction and Appeal Map for the City. As part of developing this new map, CCC staff consulted with City staff to identify a coastal bluff edge line that meets the definition in Section 13577(h) of the California Code of Regulations. This bluff edge line is based on high resolution LiDAR Digital Elevation Model data obtained in 2016 and aerial imagery from 2015 and was developed in consultation with City staff, CCC mapping staff, and CCC staff geologists.

Figure 5.1-2 Coastal Bluff Edge of the Draft Coastal LUP identifies the coastal bluff edge that was used to develop the updated Post LCP Certification Jurisdiction and Appeal Map for the City. New policies in the Draft Coastal LUP direct the use of this mapped coastal bluff edge line for the purposes of applying policies of the Coastal LUP, unless site-specific survey data demonstrates that Figure 5.1-2 Coastal Bluff Edge is incorrect either due to inaccuracies in the LiDAR data or due to changed conditions on the ground (e.g., bluff failures). If a development proposal includes identification of an alternate bluff edge line that is substantially seaward of the bluff edge line shown on Figure 5.1-2 Coastal Bluff Edge, a LCP Amendment would be required, in addition to a coastal development permit.
Public Services and Facilities

Chapter 6.1: Public Works & Energy Facilities and Chapter 6.2: Highway 101

The policies in the Public Works & Energy Facilities chapter of the Draft Coastal LUP support the City’s water conservation programs, long term water supply plans, and energy efficiency programs. The 1981 Local Coastal Plan’s Public Services chapter mainly addresses circulation and parking (now included in the Draft Coastal LUP Public Access chapter) without much detail on water supply and energy. New since the 1980s is the City’s desalination plant and the Draft Coastal LUP includes a new policy to support desalination as an important and permanent part of the City’s water supply portfolio.

Highway 101 is a major transportation corridor in the Coastal Zone. In 1994 an LCP Amendment was certified to add policies to the existing 1981 Local Coastal Plan to ensure any projects constructed within the City’s portion of the Highway 101 corridor protect and enhance existing recreational, visitor-serving, public access, scenic, and historic resources. The existing policies from the 1994 LCP Amendment are compiled, updated, and carried forward in the Highway 101 chapter of the Draft Coastal LUP.

Local Coastal Program Land Use Map and General Plan Land Use Map Amendments

Currently, the portion of the City located within the Coastal Zone is shown on four land use maps: the General Plan [Land Use] Map, the LCP Land Use Plan Maps (two maps), and the Local Coastal Plan for the Airport and Goleta Slough Land Use Map. This has led to confusion in the past as to which land use designations should be referenced and applied when reviewing development projects in the Coastal Zone. Amendments to the General Plan Map and the LCP Land Use Plan Maps are proposed in order to clearly show the LCP land use designations on the LCP Land Use Map and remove all reference to coastal land use designations from the General Plan Map. No land use designation changes are proposed as part of the General Plan Map Amendment; removing the Coastal Zone area from the General Plan Map is simply illustrative and has no impact on the intensity of allowed uses in the inland areas of the City. Similarly, no land use designation changes are proposed for the Airport and Goleta Slough areas. Land use designations for the inland portion of the Airport and Goleta Slough areas will continue to be shown as is on the General Plan Map and land use designations for the Coastal Zone will continue to be shown as is on the existing certified Local Coastal Plan for the Airport and Goleta Slough Land Use Map. The land use designations on the LCP Land Use Map will serve as the General Plan land use designations in the Coastal Zone for the purposes of reviewing non-CDP applications.

The existing LCP Land Use Plan Maps were originally certified in 1981 and have been amended several times since. These maps are entitled “Land Use Plan” and “Land Use Plan Waterfront” and show the City’s Coastal Zone excluding the Airport and Goleta Slough areas. The land use designation changes within the Coastal Zone approved by City Council as part of the 2011 General Plan Update have not yet been certified by the CCC. A LCP Amendment is, therefore, now proposed to repeal the existing LCP Land Use Plan Maps and replace them with a single new LCP Land Use Map that updates land use designations to reflect those actions by the City Council. The LCP Amendment will also correct known errors on the existing LCP Land Use Plan Maps and make limited changes to land use designations to increase consistency with
surrounding designations and/or underlying zoning designations. No changes are proposed to the certified Local Coastal Plan for the Airport and Goleta Slough Land Use Map.

Exhibit G summarizes the history of the LCP Land Use Plan Maps as amended over time and the 2011 City Council action to amend the General Plan Map. Exhibit G also describes in detail the proposed land use designation changes included in this LCP Amendment with attached illustrative maps, and a table of Assessor Parcel Numbers (APNs) involved in the proposed LCP Land Use Map amendment. In most instances, the proposed changes to land use designations reflect the existing use of the site and density of development (in the case of residential development), or the land use designation of surrounding properties.

In limited instances, the LCP Amendment includes changing land use designations from Residential (Max 12 dwelling units (du)/acre) to Medium High Density Residential (Max 27 du/acre). It is important to note that the Variable Density zoning standards (as opposed to the Average Unit-Size Density Incentive Program) for multi-unit residential development currently remain in effect in the Coastal Zone. The City’s Land Use Element has long recognized that in multi-unit residential zones where Variable Density standards apply, an individual development may exceed a density of 12 du/acre in recognition that other lots would be developed at a density lower than 12 du/acre. The result is a balanced, neighborhood-wide approach to provide an average residential density of 12 du/acre, with flexibility to adapt to site planning constraints and provide a variety of unit sizes and bedroom count. Therefore, while it may appear that the proposed land use designation change would allow increased residential density, the proposed change to Medium High Density Residential (Max 27 du/acre) does not actually raise the maximum density potentially allowed now in most cases, but rather recognizes the existing flexibility inherent in the Variable Density standards for lots zoned to allow multi-unit residential development.

In two areas – multiple parcels along Oceano Avenue and one large parcel encompassed by Santa Barbara City College – the proposed change from Residential (Max 12 du/acre) to Medium High Density Residential (Max 27 du/acre) would increase the density potentially allowed since the underlying zoning for these sites is R-2 (Two-Family Residence Zone) and the Variable Density standards are not currently applicable. Based on the existing pattern and density of development in these two areas, a land use designation allowing up to 27 du/acre is more appropriate. The underlying R-2 zoning would continue to regulate residential density on these sites until a future LCP Implementation Plan amendment is approved by City Council and certified by the CCC to rezone the properties to R-M (Residential Multi-Unit).

All of the related maps and APN table referenced in Exhibit G are available at http://www.santabarbaraca.gov/LCP and in City of Santa Barbara at the Community Development Department office at 630 Garden Street, the City Clerk’s Office at 735 Anacapa Street, and the Santa Barbara Central Library at 40 E. Anapamu Street, and the California Coastal Commission office’s in Ventura and San Francisco.

Following Planning Commission consideration and recommendation, the General Plan Map and LCP Land Use Map Amendments will be forwarded to the City Council for approval. The LCP Land Use Map will then be included with the Draft Coastal LUP in the LCP Amendment submitted to the CCC for certification.
IV. ENVIRONMENTAL REVIEW

The General Plan Map Amendment to remove the area of the General Plan Map located within the Coastal Zone and rename the map is simply illustrative in nature. The Environmental Analyst has determined that this action is, therefore, exempt from the California Environmental Quality Act (CEQA) pursuant to State CEQA Guidelines Section 15061(b)(3) as it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment.

As discussed above, the LCP Amendment includes amendments to both the LCP Land Use Plan and LCP Land Use Maps. The CEQA statute (California Public Resources Code Section 21080.9) and the State CEQA Guidelines (California Code of Regulations Section 15265) exempts local governments from CEQA environmental review in connection with preparation and adoption of its LCP. The Environmental Analyst has determined that statutory exemption (Public Resources Code Section 21080.9 and State CEQA Guidelines Section 15265) applies to City Council action to adopt the LCP Amendment and forward the LCP Amendment to the California Coastal Commission (CCC) for certification.

While considered exempt from CEQA, the proposed amendments are within the range of policy options, growth scenarios, environmental impacts, and mitigation measures studied in the certified Final Program EIR and Addenda for the 2011 General Plan and associated 2011 General Plan Map Amendments.

V. NEXT STEPS

Planning Commission will hold a hearing on June 21, 2018 that has been noticed in accordance with CCR §13515 and the Santa Barbara Municipal Code (SBMC). Following the Planning Commission’s consideration and recommendation, the General Plan Map Amendment and LCP Amendment will be forwarded to the City Council for adoption. If the Planning Commission recommends City Council adoption of a LCP Amendment with substantive changes to the policies of the June 5, 2018 Review Draft Coastal LUP, a new draft will be produced and distributed for public review at least six weeks prior to City Council’s final action. The City Council’s hearing will be noticed in accordance with the SBMC and CCR §13515, including being held at a time certain.

City Council adoption of the General Plan Map and LCP Amendments will be followed by a submittal of the LCP Amendment to the CCC for certification. The CCC will take action to determine if the submittal is deemed complete; it is possible that the Commission staff will request a one-year time extension. If the CCC approves the City’s LCP Amendment with suggested modifications, those modifications must be accepted by the City Council before the LCP Amendment is fully certified and effective. The existing certified 1981 Local Coastal Plan and LCP Land Use Maps as amended will remain in effect in the Coastal Zone until the CCC concurs that the City Council properly accepted the suggested modifications, if any, to the LCP Amendment.
Subsequent LCP Amendments

The SLR Adaptation Plan and Lower-Cost Overnight Accommodations Study, anticipated for completion in spring 2019, will likely result in recommendations for amended or new policies in the Recreation and Visitor-Serving and Coastal Hazards chapters of the Coastal LUP. If so, the amended or new policies would be reviewed, locally adopted, and submitted for certification as separate LCP Amendments to the CCC.

LCP Update to the Implementation Plan and Coastal LUP Clean-Up

Following submittal of the City Council-adopted LCP Amendment to the CCC for certification, a number of LCP Implementation Plan (IP) amendments will be processed by staff for local adoption and submittal as a separate LCP Amendment to the CCC. The proposed IP amendments include repealing guidelines and memos that are no longer applicable to the LCP and changes to the Coastal Overlay Zone (S-D-3) for consistency with the adopted Coastal LUP and to reflect current administrative practices.

EXHIBITS

A. LCP Update Meetings and Milestones
B. June 5, 2018 Review Draft Coastal LUP (Under Separate Cover)
C. Sea Level Rise Coordination
D. Public Outreach Components
E. March 1, 2018 Planning Commission Meeting Minutes
F. Comments received after March 1, 2018 on the Draft Coastal LUP
G. Description of LCP Land Use Plan and General Plan Map Amendments
H. Draft City Council Resolutions