

17 CONSISTENCY ANALYSIS COASTAL LAND USE PLAN (LUP) CONFORMITY WITH OTHER LAND USE AND PROCEDURAL EVALUATIONS AS DETAILED IN CALIFORNIA CODE OF REGULATIONS §13511 COMMON METHODOLOGY

Where an LCP or Long Range Development Plan (LRDP) is to be submitted pursuant to this subchapter, the local government or governing authority shall include the following in the scope of the LCP or LRDP pursuant to PRC §30501(a):

SUMMARY

(a) The policies of Chapter 3 of the California Coastal Act of 1976 (CCA) shall be applied to determine the kind, location and intensity of land and water uses that would conform to the policies of the CCA. Includes an analysis of the potential significant adverse cumulative impacts on coastal resources and access and potentially allowable development proposed in the LCP.

(b) This part is not applicable as it applies to LRDPs.

RESPONSE

The 2018 Coastal LUP provides a framework within which development may be accommodated, taking into consideration the protection of coastal resources as well as avoidance or mitigation of hazards. Each chapter of the 2018 Coastal LUP lists the applicable policies of Chapter 3 of the CCA, which were applied to determine the kind, location, and intensity of land and water uses in conformity with the CCA.

Most of the land in the City's Coastal Zone is either dedicated open space or already developed, with very little vacant land remaining. An analysis of the potential significant adverse cumulative impacts on coastal resources and access of existing and potentially allowable development proposed in the LCP is included in LCPA Application Material #15.

SUMMARY

(c) The level and pattern of development in LCPs shall be reflected in a land use plan, zoning ordinances, and zoning district maps. The LCP shall include measures necessary to conform with Chapter 3 of the CCA.

RESPONSE

The level and pattern of development within the City's Coastal Zone is reflected in the 2018 Coastal LUP. A description of the measures (i.e., policies) necessary to achieve conformity with the policies of Chapter 3 of the CCA is included in LCPA Application #13.

SUMMARY

(1) The land use plan component of the LCP shall incorporate a statement of applicable development and resource protection policies in the general plan that are capable of carrying out the policies of Chapter 3 of the CCA.

RESPONSE

The City's 2018 Coastal LUP incorporated all the applicable development and resource protection policies from the City's *2011 General Plan*.

SUMMARY

(2) The zoning ordinance and zoning district map shall conform with and be adequate to carry out the policies, objective, principles, standards, and plan proposals set forth in the land use plan.

RESPONSE

The subject of this LCP Amendment is the 2018 Coastal LUP and LCP Land Use Map. A subsequent LCP Amendment is proposed for the City's New Zoning Ordinance (Title 30) which will include an analysis of conformity with the policies, objectives, principles, standards, and plan proposals of the 2018 Coastal LUP and LCP Land Use Map.

SUMMARY

(d) Where application of the Chapter 3 policies of the CCA requires limits or conditions as to the amount, timing, or location of public works facilities owned or operated by the local government, an analysis shall be made to determine existing and proposed capacities, key decision points in facility expansion, and what portion of the public works facilities capacity is allocated to new development and what portion is reserved for priority uses. A similar analysis and allocation shall be made of public recreational facilities.

RESPONSE

Application of the policies of Chapter 3 of the CCA to public works facilities resulted in several 2018 Coastal LUP policies that address limits or conditions as to the amount, timing, or locations of public works facilities owned or operated by the City. For example, Policy 6.1-8 Public Works Facilities Siting places limitations on the location of new public works facilities.

Existing and Proposed Capacities

In December 2011, the City Council of the City of Santa Barbara certified a Final Program Environmental Impact Report (FPEIR) for the *2011 General Plan*. The FPEIR for the *2011 General Plan* evaluated citywide impacts on the environment from estimated potential incremental growth to the year 2030 of up to 1.85 million square feet of additional commercial and other nonresidential development and up to 2,800 additional housing units. Only a portion of this potential growth would occur within the Coastal Zone. At the time the FPEIR for the 2011 General Plan was prepared, 269 units or 9.6% of the potential additional 2,800 housing units and 148,535 or 8% of the potential additional 1.85 million square feet commercial and other nonresidential development were estimated to potentially occur within the Coastal Zone through the year 2030.

Water Supply

The City's Water System provides citywide water service to over 90,000 residents, commercial establishments and a number of small agricultural accounts. The City maintains over 300 miles of water conveyance pipeline, a regional water treatment plant, Gibraltar Dam, a desalination plant, a hydroelectric plant, 13 balancing reservoirs, 9 groundwater wells, 12 pump stations, a recycled water conveyance system with 14 miles of distribution main, and capital equipment assets. Some of these facilities are within the Coastal Zone.

Increased residential and non-residential growth under the *2011 General Plan* was projected to increase citywide water demand from approximately 14,000 acre feet per year (AFY) to 14,791 AFY¹. Currently, the City is in a Stage 3 Drought Condition with projected annual citywide demands of approximately 9,800 AFY. Consistent with data from the City's 2011 Long Term Water Supply Plan (LTWSP) and the policies of the 2018 Coastal LUP, potable water supply demand has been declining due to continuing water conservation measures, offsetting the demands of development. Furthermore, the City's Charles E. Meyer Desalination Plant was reactivated in 2017, producing about 30% of the City's demand. If drought conditions continue, the City has the option to expand the Charles E. Meyer Desalination Plant up to the permitted capacity of 10,000 AFY.

In 2016, Santa Barbara City Council adopted a resolution which amended the City's Stage 3 Drought Declaration to increase the reduction from normal citywide water use from 25% to 35%. At that time, a detailed citywide analysis of water use for new development was prepared (Attachment 1). As shown in the analysis, new development on average represents only a small portion of the City's drought water demand projection, or 28-40 AFY. As this is a citywide figure, much smaller proportion of water demand is necessary to serve new development in the Coastal Zone. Therefore, based on the new source of desalinated water in the City's water portfolio and ongoing, extraordinary water conservation measures, the water supply capacity is sufficient to accommodate existing and new development in the Coastal Zone.

Wastewater

The City of Santa Barbara Wastewater System maintains approximately 257 miles of wastewater collection pipelines, a wastewater treatment plant, a recycled water treatment plant, 9 lift stations, and various other capital assets. The El Estero Wastewater Treatment Plant, recycled water treatment plant, and several lift stations are in the Coastal Zone.

Future development under the *2011 General Plan* could result in an increased residential and non-residential development served by the City's wastewater treatment system. Using estimates for wastewater demand generation of 77% of projected residential water

¹ Actual water supply was approximately 17,000 AFY in a typical water year, prior to the prolonged drought.

demand and 83% of non-residential water demand, anticipated future wastewater would be approximately 8.55 million gallons per day (MGD), a 7.9% increase over the treated volume of 8.0 MGD at the time the FPEIR for the *2011 General Plan* was prepared. This projected volume is well below the El Estero Wastewater Treatment Plant's design capacity of 11 MGD. With the prolonged drought and ongoing water conservation programs, wastewater flows are further reduced.

The El Estero Wastewater Treatment Plan and wastewater collection system capital projects include ongoing reconstruction of treatment facilities, and ongoing rehabilitation and replacement of collection system pipes. Based on the analysis in the FPEIR for the *2011 General Plan*, there are no plans to expand capacity because the existing capacity is sufficient to accommodate existing and new development in the Coastal Zone.

Public Transportation Facilities

The City's transportation facilities consists of roads, public transportation, bike and pedestrian facilities, and parking. Traditionally, transportation and circulation focused on the capacity of roadways and intersections to move vehicles and avoid vehicle congestion. In the 1990's there was an acknowledgement that Santa Barbara could not build itself out of vehicle congestion issues. Therefore, the City shifted its focus and placed more importance on all transportation modes, including public transit, walking, and bicycling (also referred to as "sustainable transportation"). The *2011 General Plan's* goals, policies, and implementation actions intended to further integrate circulation policies with the sustainability focus by emphasizing alternative modes of transportation, maintaining traffic flow for all, and reassessing parking requirements to complement a people-oriented community.

Future development under the *2011 General Plan* was determined to have significant unavoidable impacts on traffic congestion, including potentially significant impacts at four intersections in the Coastal Zone². The *2011 General Plan* includes policies to reduce on-road vehicle use associated with implementation of the Plan by managing nonresidential growth and encouraging residential growth in specific locations, as well as by improving sustainable transportation, taking an active role in regional transportation planning efforts, expanding Transportation Demand Measures (TDM), and implementing parking management measures and a Traffic Mitigation Fee Program³. Because the City is primarily built-out, there is a limited ability to expand, widen, or otherwise build new vehicular capacity. As a result, future strategies to reduce on-road vehicle use have a

² The State is in the process of eliminating congestion as an environmental impact and in its place proposing to measure vehicle miles travelled (VMT). This change will effectively remove the Class 1 traffic congestion impact from the FPEIR for the *2011 General Plan*.

³ In adopting the *2011 General Plan*, City Council adopted findings of overriding consideration that the benefits of the plan outweighed the potentially significant traffic congestion impact, thereby finding the impact to be acceptable.

stronger focus on encouraging sustainable transportation and minimizing driving alone rather than roadway capacity enhancements.

The City's Traffic Model provides an indication of traffic volumes in the City. This Traffic Model was originally developed for the FPEIR for the 2011 General Plan as a tool to project how implementation of the *2011 General Plan* would influence congestion levels in the City, using 2008 traffic counts as a baseline. In the future, the City's congestion-based Traffic Model will need to provide vehicle miles traveled (VMT) to address recent state law (Senate Bill [SB] 743) that shifts the environmental review (California Environmental Quality Act) analysis of transportation impacts caused by development from delay (a congestion measurement) to VMT (so that greenhouse gas [GHG] emissions can be estimated).

In 2017, the City's Traffic Model outputs were converted into VMT for the City's Climate Action Plan (CAP) community-wide GHG emissions inventory because VMT can be directly converted into GHG emissions with an emissions factor. In 2017, new VMT estimates were calculated from the City's traffic model with 2015 traffic counts and land use information, to provide inputs for the 2015 update to the City's community-wide GHG emissions inventory. The analysis showed little change in total estimated VMT between 2008 and 2015. Traffic within the City has decreased and increased at various points in time and areas of the City through the period since 2008, and is currently overall at about the same level as 2008.

In summary, increasing road capacity to accommodate existing and the anticipated minor amount of new development in the Coastal Zone is inconsistent with City policy as well as 2018 Coastal LUP policies to encourage sustainable transportation and reduce VMT.

Public Recreational Facilities

The City's diverse public recreational facilities includes 1,735 acres of natural open space, community parks, and neighborhood parks. Within the Coastal Zone, over 200 acres of land are publicly owned and used for recreation. Future development under *the 2011 General Plan* could result in a potential future increase of up to 6,700 residents (a much smaller portion of which would occur in the Coastal Zone) and increased visitation could gradually increase the demand for park and waterfront recreation facilities and services. However, based on existing City programs and policies of the *2011 General Plan*, the FPEIR for the *2011 General Plan* concluded that citywide park and waterfront/beach and recreational facilities are sufficient overall for the projected levels of future population. Furthermore, policies of the 2018 Coastal LUP protect, encourage, and where feasible, provide additional recreational facilities. New development and substantial redevelopment is required to evaluate potential new user demand generated by the development, and, if there is a substantially increased user demand, provide on-site recreational open space for new users generated by the development.

SUMMARY

(e) If the level and pattern of development recommended for the LCP require phasing of public service or recreational facilities owned or operated by the local government to be consistent with the CCA, then proposed measures for implementing public service and recreational facilities shall be specifically identified.

RESPONSE

The City's Coastal Zone is mostly already developed and the level and pattern of development anticipated for the LCP is minimal. As a result, no phasing of public service or recreational facilities owned or operated by the City for consistency with the CCA is anticipated.

SUMMARY

(f) A procedure shall be developed to ensure adequate notice to interested persons and agencies of impending developments proposed after certification of the LCP.

(g) This part is not applicable as it applies to Long Range Development Plans (LRDPs).

RESPONSE

The public noticing requirements are established in the Implementation Plan (Title 28 Zoning Ordinance) §28.44.130. Posted notice on the project site is also required in §28.87.380.

Attachment

1. Analysis of Water Use for Development

Analysis of Water Use for Development

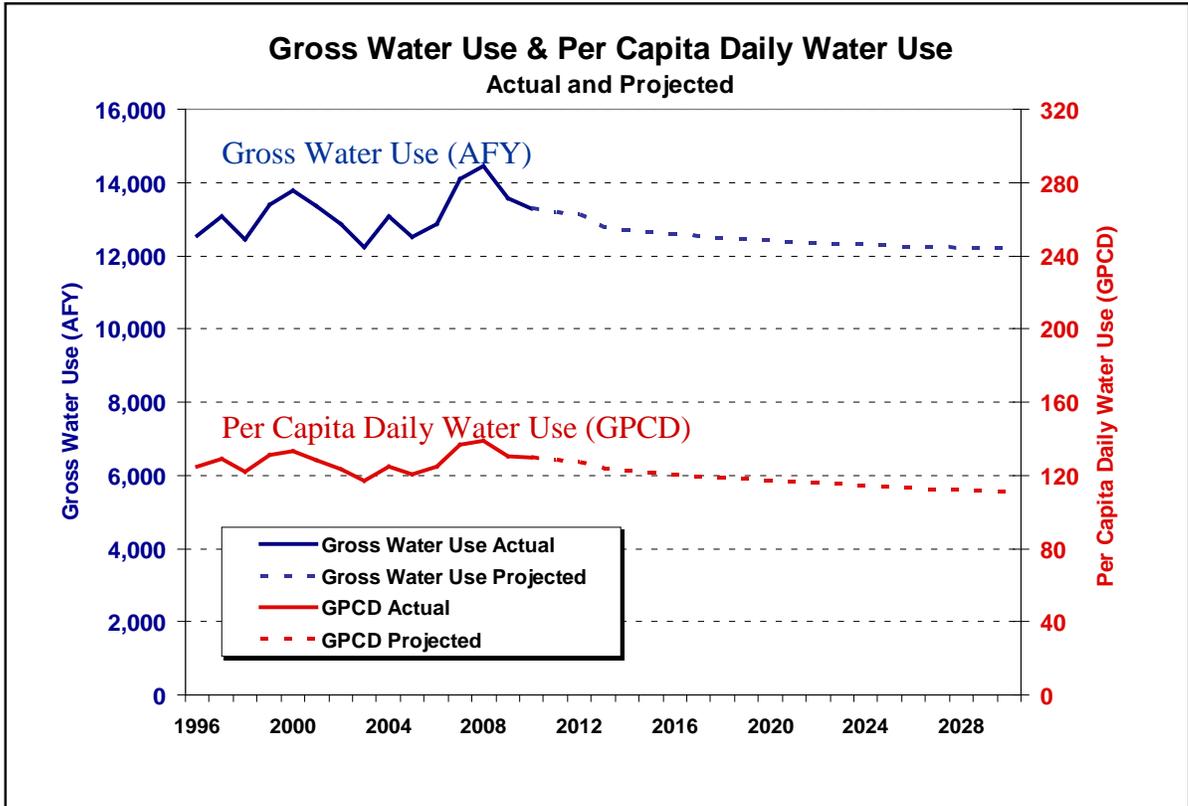
During a normal year, the City's water demand is 14,600 acre feet per year (AFY). Currently, the City is in a Stage Three Drought Condition with projected annual demands of approximately 9,800 AFY (65% of normal potable demand, plus some recycled water use). On average, development represents approximately 0.35% of the City's drought water demand projection, or 28-40 AFY (refer to Table 1 below). This estimate is based on information provided in the General Plan Update Final Environmental Impact Report (FEIR) and City data on development over the last ten years, as described below.

The FEIR prepared for the City's General Plan Update included an assessment of planned growth (assuming 2,800 new residential units and 2 million square feet of nonresidential development) over the 20-year planning period (2010-2030). This additional growth was estimated to increase long-term citywide water demand by a cumulative total of 791 AFY by the year 2030. This breaks down to approximately 40 AFY of new annual water demand, representing 0.41% of the annual drought demand projections.

City staff reviewed completed construction projects in the City from 2004-2013 (as determined by issuance of a certificate of occupancy for each project) and found that an average of 28 AFY of new water demandⁱ went online each year. Although the number varied greatly from one year to another (ranging from 8 to 55 AFY), this time period captured a development boom as well as the recent recession, and should serve as a realistic average in gauging development over the next 5 years. Most recently, for 2014 and 2015, a total of 38.54 and 9.74 AFY respectively, went online based on certificate of occupancy issuance (average of 24 AFY), which is consistent with the average over the previous 10 years. A 28 AFY increase would represent 0.29% of the annual drought demand projections.

Table 1: NET WATER DEMAND FROM DEVELOPMENT		
	Estimated (Per General Plan Update FEIR)	Actual¹ (2004-2013)
Acre Feet Per Year (AFY)	40 AFY	28 AFY
Annual Demand (% of Annual <u>Normal</u> Water Demand (14,600 AFY))	0.27%	0.19%
Annual Demand (% of Annual <u>Drought</u> Water Demand (9,800 AFY))	0.41%	0.29%

While it may seem surprising that development represents such a small portion of the City's water demand, this information is consistent with data from the City's 2011 Long-Term Water Supply Plan (LTWSP). The LTWSP anticipates declining potable water demand due to continuing water conservation measures (including long-term efficiency improvements resulting from measures such as updated plumbing codes and appliance standards) offsetting the effects of development, as illustrated in the following chart from the City's 2010 Urban Water Management Plan update.



During the last prolonged drought event (approximately 1986-1992), significant time and effort was spent to determine, on a case by case basis, if a proposed project could be provided sufficient water supplies without significantly impacting the City's ability to provide adequate supplies to existing users. Two major differences today, in comparison to the last significant drought, are that new projects have substantially lower water use due to required water efficient plumbing fixtures and landscaping, and there are significantly fewer projects in the pipeline (estimated demand of 616 AFY for all pending and approved projects in 1986 vs. 167 AFY currently). Refer to Table 2 for a breakdown of estimated water demand from pending and approved projects. Table 3 identifies the estimated water demand from all projects that have been issued a building permit, but have not received a certificate of occupancy. Additionally, the City's overall water consumption is less now than it was back then (approximately 16,225 AFY in 1986 vs. approximately 14,600 AFY currently (pre-drought)).

Table 2: ESTIMATED WATER DEMAND¹ FROM ALL PENDING AND APPROVED DEVELOPMENT (AFY) (THROUGH 2-29-16)				
PROJECT STATUS	LAND USE			TOTAL
	Residential	Mixed Use	Non-Residential	
Approved (No Building Permit Issued)	54.66	7.65	7.33	69.64
Pending (Not Approved)	13.24	58.95	25.31	97.50
TOTAL	67.90	66.60	32.64	167.14

The numbers identified in Table 2 represent projects in various stages of the process that have been submitted over many years. Some of these projects may never come to fruition, but it represents a worst-case analysis for purposes of context. If all of the projects currently in the pipeline were approved and built in the next year, it would represent 1.7% of the annual drought water demand projection (1.14% of normal year demand).

If the City Council were to restrict issuance of permits for development, it would affect approved and pending projects, which total approximately 167 AFY (Table 2). Table 3 identifies those projects for which a building permit has already been issued. These project approvals, which total approximately 75 AFY, would not be affected by a moratorium on development.

Table 3: ESTIMATED WATER DEMAND¹ FROM ALL DEVELOPMENT CURRENTLY UNDER CONSTRUCTION (AFY) (THROUGH 2-29-16)				
PROJECT STATUS	LAND USE			TOTAL
	Residential	Mixed Use	Non-Residential	
Building Permit Issued	24.0	20.03	31.29	75.32

With regard to those projects in the pipeline (pending and approved) and those for which a building permit has been issued, several of them are Affordable Housing projects.

Affordable Housing is a top priority for the City, and the General Plan includes policies supporting affordable housing. Policy LG1 is to “prioritize the use of available resources capacities for additional affordable housing... over all other new development.” Table 4, below, identifies the estimated water use associated with affordable housing projects. If a moratorium on development were imposed, affordable housing may be exempt, so it is important to consider what portion of new water demand is associated with affordable housing.

Table 4: AFFORDABLE HOUSING PROJECTS			
PROJECT STATUS	ADDRESS	DESCRIPTION	ESTIMATED WATER DEMAND¹
Permit Issued	240 W. Alamar	4 moderate income units	0.22 AFY
Permit Issued	1032 E. Mason	6 units for seniors	1.07 AFY
Subtotal			1.29 AFY
On Appeal	251 S. Hope	80 units for low- and very-low income frail elderly	14.4 AFY
Approved	510 N. Salsipuedes	40 units for families	6.4 AFY
Approved	3869 State	58 units for seniors	7.07 AFY
Pending	813 E. Carrillo	17 studios for Veterans	2.3 AFY
Subtotal			30.17 AFY
TOTAL			31.46 AFY

Pending and approved affordable housing projects total 30.17 AFY, which represents 18% of the total pending and approved development.

ⁱ Based on Water Demand Factors from the Water Demand Factor Update Report, City of Santa Barbara, October 2009.