

CALIFORNIA COASTAL COMMISSION

SOUTH CENTRAL COAST AREA
89 SOUTH CALIFORNIA ST., SUITE 200
VENTURA, CA 93001
(805) 585-1800



September 5, 2018

Debra Andaloro, Principal Planner
City of Santa Barbara
Community Development Department
P. O. Box 1990
Santa Barbara, CA 93101-1990

RE: Local Coastal Program Amendment LCP-4-SBC-18-0062-1 (Land Use Plan Update)

Dear Debra,

On August 21, 2018 our office received the City's submittal to amend the Land Use Plan of the certified Local Coastal Program (LCP) with a comprehensive update. Staff has reviewed the materials submitted for the subject LCP amendment request and we have found that there is additional information that is required for our analysis of this request. Pursuant to Article 15, §§ 13551 and 13552 of the Commission's regulations, this additional information is required to deem the City's proposed amendment complete. Please provide the following information:

(1) Public Parking

We have received and reviewed the supplemental materials that describe the stock of available public parking within the Coastal Zone, as well as the types of uses authorized in the Harbor Commercial area of the waterfront. However, in order to fully evaluate the public parking policies for consistency with the public access policies, please provide some additional clarifications on the existing parking situation, including the following:

- Please provide additional background and details regarding the parking assigned to lease space users. For instance, how does the City determine how many parking spaces are appropriate per recipient/lease? Are lease parking spaces granted for owners, operator, employees, and/or customers of businesses that are within walking distances of public parking lots? In which of the public parking lots is the lease space program implemented? How does the lease space program differ from the first come, first served fee based public parking approach in the public parking lots of the coastal zone? In other words, how do recipients of the lease spaces utilize the program—are they provided a parking permit that grants free or extended parking for a certain time frame, do they receive a discounted parking rate, etc.?
- Please provide additional background information and details on how special event parking is implemented in the Coastal Zone? For example, on Wednesday, August 29th, almost the entirety of the Leadbetter parking lot was reserved for "special event parking." Who implements the special event parking? What are the

parameters for approval? Does the City analyze the potential for an adverse impact on public access parking that a temporary removal of such parking could have? Does the City provide additional public access parking in lieu of the parking that becomes reserved for special and/or private event parking? Is there a maximum number of public parking spaces that may be impacted at any given time?

- The Harbor Main parking lot advertises a “2018 Annual Waterfront Parking Permit.” Please provide additional background and details regarding the implementation of this permit program. Does this permit allow for parking beyond the hours/time limits listed on the Harbor Main parking lot signage and/or does it facilitate a one-time annual payment of all parking fees? Does this permit apply to all public parking lots in the Coastal Zone? Are there any other limitations (e.g., persons who may qualify to purchase the permit)? Please provide background and details regarding other parking permits available, if any.
- The Chase Palm Park parking lot is included on the “Public Parking Lots in the Coastal Zone” map and designates the availability of six public access parking spaces. However, curb signage within the parking lot indicates that use of the parking spaces in this lot is by “permit only.” Please clarify the circumstances that apply here. For example, what parking permit type does this parking lot require? Is this parking lot available at any time to the public without a permit? Are there any other lots depicted on the “Public Parking Lots in the Coastal Zone” map with similar permit requirements, thus limiting the public’s use of the spaces?
- Please provide detailed information on any residential parking programs in the coastal zone.
- Please provide all parking area studies (not including development driven or project-specific parking studies) from the last ten years that analyze public parking inventory and use within the coastal zone and areas adjacent to the coastal zone that have the potential to impact public access parking in the coastal zone. Please include the “Funk Zone Parking Study” listed as Item No. 7 within the April 12, 2018 Downtown Parking Committee regular meeting minutes.

(2) Cumulative Impacts Analysis

We have received and reviewed the “Analysis of Potential Cumulative Impacts on Coastal Resources” that describes the analysis completed for the adoption of the 2011 General Plan. We find that this analysis is not specific enough to the coastal zone or to the LUP update itself. The provided analysis includes data from 2011 and earlier and bases the cumulative impacts analysis on predicted buildout calculations that have been derived from past yearly buildout averages. We have previously discussed maximum buildout potential in the coastal zone, including vacant lots as well as underdeveloped parcels. In addition, this amendment includes the rezoning of a number of parcels. We

would anticipate that the cumulative impacts analysis would include a review of any changes in the density and intensity of uses between the existing certified Land Use Map designation and the proposed Land Use Map designation. Please provide a revised cumulative impacts analysis that evaluates the changes in density, intensity, and uses compared from the existing, certified Land Use Plan to the proposed updated Land Use Plan. In addition to evaluating such buildout, the cumulative impacts analysis must address the changes in buildout that have the potential to create any adverse cumulative impacts on coastal resources. Please note, the 2011 General Plan does not constitute the baseline with which to compare the proposed changes from the comprehensive update of the Land Use Plan.

Thank you for your time and attention to this matter. Please note that additional information may be required depending on the information obtained from the abovementioned items. Should you have any questions, please do not hesitate to contact me at (805) 585-1800. We look forward to receiving the requested materials and moving forward with our review of this amendment application.

Sincerely,

A handwritten signature in cursive script that reads "Megan Sinkula".

Megan Sinkula
Coastal Program Analyst