Coastal Housing Coalition

July 18th, 2006

Mr. Ken Curtis, Director
Planning & Environmental Services Department
City of Goleta
130 Cremona Drive, Suite B
Goleta, California 93117

Re: Comments on Goleta’s draft General Plan EIR

Dear Mr. Curtis:

This letter is being sent on behalf of the Coastal Housing Coalition (The Coalition) to represent a partial summary of the reasons we believe the city’s draft General Plan is inadequate and unacceptable. All of our comments and concerns are directed at the City's commitment to build affordable and workforce housing, the short supply of which has reached crisis proportions in the Goleta Valley.

We also join those who believe that the review period for the proposed General Plan EIR should be extended beyond the 48 days allotted, based on the simple fact that aspects of the General Plan have changed since the EIR review period began. The public cannot be expected to keep up with a moving target.

Of the many problems contained in the Goleta draft General Plan, The Coalition would like to comment on three of the more onerous ones:

1. While the General Plan describes the city’s purported commitment to urban residential in-fill, especially with affordable and workforce housing, barriers to approval of housing projects have been erected in most of the General Plan’s elements. One need only to read the Elements on Noise, Traffic, Conservation, and Open Space to find requirements that must be fulfilled before any additional housing is built in the city. The Coalition believes that this makes the General Plan inconsistent with rest of the city’s planning framework.

2. The City Council/Planning Agency has imposed a prohibition against even considering requests to rezone, for example, non-performing agricultural properties within its urban boundary for residential development in its first General Plan. The Coastal Housing Coalition believes this makes the Land Use and Housing Elements deficient since we are firmly convinced that the previously mentioned barriers will make most, if not all, of the identified affordable and workforce housing sites undevelopable. The City needs to increase its potential housing sites, and its steadfast refusal to consider doing so further erodes its capacity to provide workforce housing.

3. The City Council/Planning Agency pulled out of the air a requirement for

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www.voicesforhousing.org
Mr. Ken Curtis, Director  
Planning & Environmental Services Department  
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55% affordable housing in its inclusionary ordinance. While the sentiment behind a high percentage of affordable housing for market-rate projects may be laudable, this percentage has not been utilized elsewhere and is considered by housing experts to be unworkable and unachievable.

Other community groups and individuals have commented in much greater detail on the many deficiencies contained in the draft General Plan than the Coalition is doing in this letter, but we are in substantial agreement with most of the concerns that have been raised. While we appreciate the time other stakeholders have spent in analyzing the General Plan and draft EIR, we are persuaded that the inconsistencies between the General Plan and its associated Elements provide sufficient reason for the State Housing and Community Development Department to reject your City's draft General Plan and to return it for re-work. Unless the many deficiencies are corrected before submission, that is what we will be urging State HCD to do.

Sincerely,

Bud Laurent, Director of Housing Policy  
Coastal Housing Coalition

Cc: Don Thomas, State Housing and Community Development
Response to Comment No. B.20-1

See response to comment B.2-1.

Response to Comment B.20-2

The commentator states an opinion that policies in several elements will not allow the amount of residential development described in the housing element to occur. The commentator has not commented on the adequacy of the environmental analysis presented in the DEIR; therefore, no further response is necessary.

Response to Comment No. B.20-3

The commentator has made a general comment the about City Council/Planning Agency refusal to rezone properties and has not commented on the adequacy of the environmental analysis presented in the DEIR. No further response is necessary.

Response to Comment B.20-4

See response to comment B.4-45.

Response to Comment No. B.20-5

The commentator states an opinion that there are inconsistencies between the GP/CLUP elements, referring to comments submitted by “other community groups and individuals.” The GP/CLUP addresses the distribution of land uses, identifies needed transportation and other public facilities, addresses housing needs, and provides protection for environmental resources in an integrated and consistent manner. The analysis on the record supports the General Plan and the conclusion that there are no inconsistencies among it provisions and elements. Because this comment raises the issue but does not cite any specific alleged instances of inconsistencies, the commentator is referred to the responses to other commentators regarding specific inconsistencies of the General Plan and associated Elements.
From: Ken Curtis  
Sent: Tuesday, July 18, 2006 3:23 PM  
To: Anne Wells; Cindy Moore  
Subject: FW: General Plan Public Comment

-----Original Message-----  
From: Margaret Connell <mailto:margaretconnell@earthlink.net>  
Sent: Tuesday, July 18, 2006 1:44 PM  
To: Ken Curtis  
Subject: FW: General Plan Public Comment

Some comments for you.  
Margaret

----- Forwarded Message
From: Gary Coombs <gcoombs@goletadepot.org>  
Organization: South Coast Railroad Museum  
Date: Tue, 18 Jul 2006 11:58:03 -0700  
To: Jonny Wallis <jwallis@cityofgoleta.org>, Cynthia Brock <cbrock@cityofgoleta.org>, Margaret Connell <mconnell@cityofgoleta.org>, Margaret Connell <margaretconnell@earthlink.net>  
Subject: General Plan Public Comment

Dear Jonny, Cynthia and Margaret,

I understand that today is the last day to provide public comment on the Draft General Plan. I wasn't sure how to get these comments to the right person at this last minute, so I'm sending them to all of you. Hope this is acceptable.

I only had time to review the historical/cultural resources section. Here are my comments & suggested corrections:

1. "Goleta Depot" is a proper name, used by the National Park Service in their National Register designation, as well as the County of Santa Barbara, etc., to refer to the historical landmark. I respectfully request that you do not use "Goleta Train Depot" (which now appears on pages 6-17 and 6-19) in the GP documents.

2. on page 6-17, you might also want to mention that many of the National Register properties (e.g., Goleta Depot) are also listed on the "California Registry of Historical Resources."

3. Goleta Depot was built in 1901, not in 1902 as stated on page 6-19.

4. Goleta Depot was on Depot Road, adjacent to North Kellogg Ave. (north of Hollister Ave.), not South Kellogg Avenue as stated on page 6-19.

5. I'd recommend adding the goal of seeking "Certified Local Government" status to the GP's historical/cultural resources section. CLG status is conferred by the state and has a number of benefits to local governments as well as nonprofit orgs and others within its boundaries.

6. If there is interest in expanding the list of historical & cultural resources for the General Plan publication, there are a couple of additional resource survey documents that I could recommend to staff or whomever is handling this part of the General Plan.

Gary

Gary B. Coombs, Ph.D., Director  
South Coast Railroad Museum  
300 North Los Cárneros Road  
Goleta, CA 93117-1502
Response to Comment No. B.21-1

The commentator has requested several editorial corrections to the text of the GP/CLUP, specifically with regards to the Goleta Depot. The commentator's requested items 1, 3, and 4 have been revised in the Final GP/CLUP. Other items (2, 5, and 6) recommended for consideration by the commentator were left unchanged in the Final GP/CLUP at the discretion of the City.
From: Ken Curtis  
Sent: Tuesday, July 18, 2006 5:02 PM  
To: Anne Wells  
Subject: FW: Request to delay certification

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From: Steve & Becky Jones (mailto:jon0533@cox.net)  
Sent: Tuesday, July 18, 2006 3:47 PM  
To: Ken Curtis  
Cc: Dan Singer; Kristen@GoletaValley.com  
Subject: Request to delay certification

Dear Ken,

Please find attached my letter requesting a delay in the EIR process until the final draft of the General plan has had more through public comment.

I strongly object to putting all of the housing planning in direct conflict with the transportation element. There has been a technique in place in Goleta that for years has indicated, "Oh we're for this or that". Ultimately nothing can be done because of some unrelated restriction that pops up. I call it the I forgot! Homicide was a crime technique. I feel that is precisely the problem with the housing element conflict that is in place with the location compounding already impacted intersections. Nothing can happen!

Better plan then EIR.

R. Steven Jones

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CITY OF GOLETA  
CALIFORNIA  
JUL 18 2006  
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file://S:\Planning-Shared\General Plan EIR\DEIR Public Comment\emails\FW Request to ... 7/19/2006
Dear Mr. Curtis,

On July 11, one week before the deadline to submit comments on the EIR, the General Plan was amended. I find this to be an inappropriate measure taken by the City Council. As these changes are not even reflected or analyzed on the EIR, how can the residents of Goleta fully understand the impacts of these changes?

Your chief concern should be on the community that the General Plan will ultimately affect. By making last minute changes, and not allowing the community the opportunity to study the impacts of these changes, the City Council is creating a General Plan that will create an uncertain future for Goleta.

Understanding environmental impacts is a vital portion of the public process that governs the creation of our city’s General Plan. These impacts will affect my children, neighbors, and future residents of Goleta. Since the future of our region is at stake, we should have every opportunity to engage in the process and fully understand the General Plan’s implications.

I urge you to slow down the review process, and study the changes that have been made to the General Plan so that their impacts are reflected in the EIR.

Sincerely,

R. Steven Jones  
Chairman of the Board  
Small Business Entrepreneurship Center  
805-895-5394
Response to Comment No. B.22-1

See response to comment B.2-1.
From: CandiCorbanil@aol.com [mailto:CandiCorbanil@aol.com]
Sent: Monday, July 17, 2006 10:33 PM
To: Rob Mullan
Subject: Re: Goleta General Plan and EIR

Attention Mr. Ken Curtis,

Cumulative impacts are often cited as reasons to stop development because incremental changes can lead to a diminution in the quality of life for residents. It is now time to stop - review - and rework the General Plan drafted by the Goleta City Council. The failure of this Council to share power has resulted in Elements that are mutually incompatible, Restrictions that are unreasonable and Mandates that will prevent business and residents from thriving. The totality of this document is confusing, misleading and lacks sufficient public review to survive a court challenge.

The purpose of a General Plan is to guide property owners and developers so as to get community needs fulfilled. This document fails to accomplish that goal. Property owners cannot possibly receive guidance from a document that has no clue where it's going.

Please review the process and stop the forward movement of this General Plan while there is still time to review and craft a document that will guide property owners in understanding their property rights and assist the City in reducing their exposure to expensive legal assaults.

Thank you for anything you might be able to do to turn this potential disaster around.

Sincerely,

Candace G. Corbanil
Acting Secretary,
Goleta Tomorrow
Response to Comment No. B.23-1

See response to comment B.2-1.