

CALIFORNIA COASTAL COMMISSION

SOUTH CENTRAL COAST AREA
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October 10, 2006

Jamie Goldstein
County of Santa Barbara
Redevelopment Agency
1105 Santa Barbara Street, 4th Floor
Santa Barbara Courthouse East Wing
Santa Barbara, CA 93101-6065

RE: Draft Isla Vista Master Plan

Dear Mr. Goldstein:

Commission staff would like to take this opportunity to comment conceptually on the Draft Isla Vista Master Plan. Due to staff constraints we have not reviewed the Draft Environmental Impact Report that was circulated this summer. However, as we discussed in our meeting on October 5, we would like to provide some general comments on the plan. It is our understanding that the IVMP will be a separate, stand-alone document that will include new LUP policies and development standards to encourage the economic redevelopment of Isla Vista, including increased residential densities, increased maximum height of structures, changes in circulation and reduction/modification of required parking. Based on this general description, Commission staff has concerns regarding consistency with the Coastal Act:

1. *Implementation of Infrastructure Improvements.* In general, Commission staff is supportive of clustering new development (e.g., increased residential density) in existing urban areas consistent with Coastal Act Section 30250. However, Section 30250 encourages new development in "existing developed areas able to accommodate it or, where such areas are not able to accommodate it, in other areas with adequate public services and where it will not have significant adverse effects, either individually or cumulatively, on coastal resources." It is not clear how the already highly impacted area near the University has adequate infrastructure to accommodate a proposed increase in density, since both circulation and parking would be dramatically impacted. The impacts to circulation and parking have the potential to adversely impact coastal access in and around Isla Vista and the University. Though there may be feasible measures to improve circulation or provide additional parking locations or structures, there is no accountability to make sure that infrastructure improvements are in place prior to the buildout of these units which will exacerbate the existing circulation and parking problems in Isla Vista. Therefore, at a minimum, there would be a temporal impact while infrastructure modifications are "planned" or in the process of being constructed. This does not seem feasible in this location given the existing conditions. Identifying potential projects within the Transportation Improvement Plan is not sufficient to ensure that these are actually implemented.

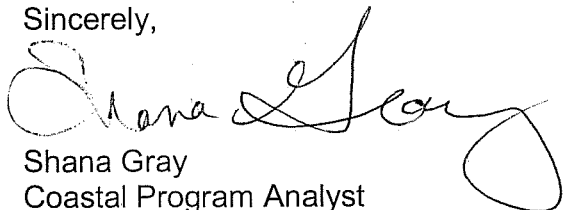
2. *Parking Program.* There is an inherent correlation between the Isla Vista Master Plan and the proposed Isla Vista Parking Program. However, the Parking Program is being considered separately by the Coastal Commission under an appeal. However, we believe that the Parking Program, assuming that it is approved by the Commission in some form, should be incorporated within the Isla Vista Master Plan, given its direct link with the IVMP-associated density and parking standard modifications.

In addition, LCP Policy 2-23 requires the County to work with property owners in Isla Vista to identify vacant sites for the potential development of parking to serve existing residential units. Additionally, Policy 2-23 anticipates that the County will explore the possibility of acquiring or developing public parking. The certified LCP has requirements to remediate the existing parking problems in Isla Vista. These have not been resolved under the existing density. The proposed amendment would increase density and modify certified parking standards, which would further exacerbate the parking concerns. In order to consider additional density, specific parking areas need to be acquired to provide community parking. As discussed in item 1 above, the availability of these new parking areas need to be timely, predictable and irrevocable.

3. *TDR Program.* As explained in our September 27, 2006 comment letter on the DEIR for Santa Barbara Ranch, it is Commission staff's opinion that the County should identify and transfer development rights from the Naples townsite to an appropriate site within a designated urban area that is suitable for residential development. If the other Coastal Act issues such as infrastructure and coastal access can be resolved, it appears that Isla Vista may be an appropriate receiver site for the transfer of development rights (TDRs) from the Gaviota Coast and/or other locations. All TDR programs rely on the receiver sites to "pencil out" (the value of an additional unit must be sufficient incentive to encourage the property owner to purchase the TDR). Given the density alternatives considered under the DEIR, this area should specifically be considered for inclusion under a TDR program. This may conflict somewhat with the goal of providing economic incentives for redevelopment, however, we would request that alternative scenarios be considered. Additionally, we recognize that there may be other appropriate "donor" sites, if such a TDR Program is to be considered.

Commission staff will review the final County-approved Isla Vista Master Plan as a future LCP amendment. Commission staff will also review all potentially appealable CDPs approved by the County for the development. Depending on the particular details of the final approved project and LCP Amendment submittals there may be additional comments or issues to be addressed.

Sincerely,



Shana Gray
Coastal Program Analyst

CC: Gary Timm
Steve Hudson