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July 25, 2023

City Council of the City of Goleta  
Planning Commission of the City of Goleta  
130 Cremona Drive  
Goleta, CA 93117

Re: 7190 Hollister Avenue and Easterly Vacant Parcels (~10 acres)

Dear Mayor Perotte and Members of the City Council, and  
Chair Smith and Members of the Planning Commission:

I write on behalf of myself and Daniel E. Hochman, the two representatives of the property owners of the captioned parcels.

We appreciate the careful thought you gave to the difficult rezoning questions discussed at the first Study Session hearing on July 20, 2023. You accomplished a lot!

You have asked Staff to include 7190 Hollister Avenue on the list of sites recommended for high density housing.

For the reasons below, we strongly encourage you to add the vacant 7 acres to the recommended list.

#### Current Zoning

There is a critical consideration completely omitted from the discussion last Thursday: The vacant 7 acres are *already zoned* for a combination of commercial on Hollister and medium density residential on the north portions. The City uses a rough standard of converting potential commercial square footage to “units.” Using this standard, the *existing* zoning provides for development of the vacant 7 acres can now be developed for 55 commercial “units” plus 82 housing, for a total of 137 “units.” Because that development is already allowed by zoning, it only makes sense to consider the *incremental* difference in units if the properties are zoned for high density housing.

As shown on the attached analysis, if the vacant 7 acres are added to the recommended list for RH zoning, and the commercial zoning eliminated, the *incremental increase* in zoned units will only be 68 “units.” RH housing fills a critical need of the City for and addresses the State’s requirements. And the benefits of that change, discussed below, are significant ....

#### Master Planning All 10.6 Acres

We believe we articulated very sound arguments as to the great benefits from master planning the 10.6 acres as a whole. And we anticipate being able to provide additional testimony from an experienced architect on this point.



As is apparent from the attached rendering (Exhibit A), master planning the properties together, *all under consistent zoning*, will most realistically allow an extension of Pacific Oaks that will provide ideal access to the 10.6 acres, without requiring additional modifications of the frontage to the east along Hollister.

Master planning the entire site will offer the ideal opportunities for addressing and protecting all important resources—view corridors, and important habitats if any.

The critical piece of information not emphasized at Thursday’s hearing is that the difference between changing the zoning *only* on 7190 Hollister Avenue as opposed to changing the zoning for the entire 10.6 acres is only 68 units. We believe the potential impacts of that additional housing will be more than offset by the complete elimination of commercial.

The incremental potential impacts are small or even non-existent because of the offset of elimination of the commercial allowed under current zoning. Housing does generate traffic, but that traffic tends to be early and late in the day. Commercial traffic is spread throughout the day. The City should focus on vehicle miles travelled (VMTs). We believe the VMTs that would result from the development of potential workforce and maybe senior housing, both suitable with high density housing, may well be lower than traffic impacts from the current zoning. Placing the workforce residences near employers would reduce the VMTs significantly, and importantly, also reduce the congestion at the intersection of Storke and Hollister. Workers and residents would be able to walk to nearby retail, service, and recreational sites including the Camino Real Marketplace, Hollister Village, The Plaza, Hilton Garden, Target, and Girsh Park. Traffic at the impacted intersection would be further reduced as workforce for the Ritz Carlton and UCSB would also avoid the congestion to the East of our site and the Storke and Hollister intersection. On the other hand, leaving the parcels zoned for commercial use would necessarily *increase* VMTs from outside the neighborhood, further impacting the intersection and adding to congestion. The commercial development allowed by current zoning will draw traffic and merely add to the need for additional housing.

And the benefits of master planning the entire site are enormous. The only potential issues of concern discussed at Thursday’s hearing will be the very same issues faced with development under the *existing* zoning. But if the entire 10.6 acres can most readily be master planned, we can address all of those issues much more effectively.

#### Planning (Not Zoning) Considerations

You have identified potential areas of concern with utilization of these sites—potential impacts to ESH areas (if they exist), viewsheds, and possibly watercourses. *These are planning issues, not zoning issues.* The sites are already zoned for a combination of commercial and housing. The City has sound policies to protect sensitive habitats, to create and protect open space, and to protect viewsheds. When developed per *existing* zoning, the identical issues will be raised and will need to be addressed. And if the 10.6 acres are master planned, under the same and consistent zoning, the opportunities to protect valuable habitat and to preserve views will be greater. Commercial zoning along Hollister Ave would



necessarily impact viewsheds, as it has in projects to our site's East. Densities can be adjusted on portions of the property, and housing grouped to protect better protect views and environmental resources. That in turn helps make it possible to accommodate employer housing and senior housing. Analysis of existing resources and of all potential impacts will be done at time a specific project is considered. These are planning, not zoning considerations.

In short, we believe Goleta can more readily achieve its objectives with the proposed zoning than with the existing zoning.

### ESH

The current mapping, which we believe was designated not based on an in-the-field survey, but simply from aerial images, shows ESH on the property. We have prepared a thorough field study that concludes that almost all of the material on the site is non-native, non-sensitive material.

The City has not yet analyzed our information. It may be that the City's preliminary designation is correct. If so, the ESH will have to be respected under applicable policies. But if the reality is that the designation needs to be updated because it simply is not accurate, then that will be important in planning the site.

Especially because the ESH designation has not been validated we believe this is a planning, not a zoning issue. At the time housing is proposed, a careful analysis of the actual resources on the site will guide the design. If the current commercial/medium density zoning is retained, the identical problems will still be faced when the site is developed, but the solutions will be constrained by the current split zoning which provides for commercial at the front 40%.

### Watercourse Resource?

In discussions of the proposed zoning we have heard some mention that there is an important tributary or watercourse on the property. We believe that is simply incorrect.

As shown on the attached official City of Goleta Creek and Watershed Management Plan map of existing creek corridors,, Exhibit B, there are no significant watercourses near the property. The map attached as Exhibit C, which is part of our study of environmental constraints on the vacant 7 acres, does show, with a row of blue dots, a course of water. But this is neither a significant nor historic water course. As shown on Exhibit C, the two drainage culverts that feed the property are only feeding water runoff from the southbound lanes of the highway onto the vacant 7 acres. The residential properties to the north of the freeway do not feed these culverts. The "watercourse" on the vacant 7 acres is not natural or historic, just freeway overflow, and does not, we believe, represent a "resource" that requires protection.

Although we are commenting briefly on views, environmental resources, and the watercourse issue, we believe that these are all issues that should be addressed as planning matters, when a project



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is proposed, not as a basis for adoption or rejection of proposed zoning that otherwise benefits the community.

#### State of California

We think a failure to include the vacant 7 acres, an obvious in-fill site located on a major transportation corridor, already zoned for some housing and with commercial development, may well affect the credibility of the City when presenting the plan to the State.

We all know that the State will review the proposed plan with a critical, perhaps “suspicious” eyes. If outlying properties are designated for higher density housing, but not obvious infill properties, the City will be inviting the State to compel addition of the properties, rather than acceptance of the plan. We suspect that the State is not likely to focus not on potential ESH or viewsheds, but on the necessity for additional affordable housing and vehicle miles travelled (VMT's). We suspect that the State will question why the vacant 7 acres is not to be used for housing. And, with 40% of the vacant 7 acres retained as zoned for commercial use, the State will correctly conclude that the new development will generate still greater need for housing, and that vehicle trips will be generated by residents travelling from outside to those destination. Creation of additional commercial development will only exacerbate the City's challenges.

#### Conclusion

We look forward to speaking with you again on Tuesday and thank you for your careful consideration of the issues we all face.

Sincerely,

Derek Westen

cc. Daniel E. Hochman  
City Planning Staff

# EXHIBIT A

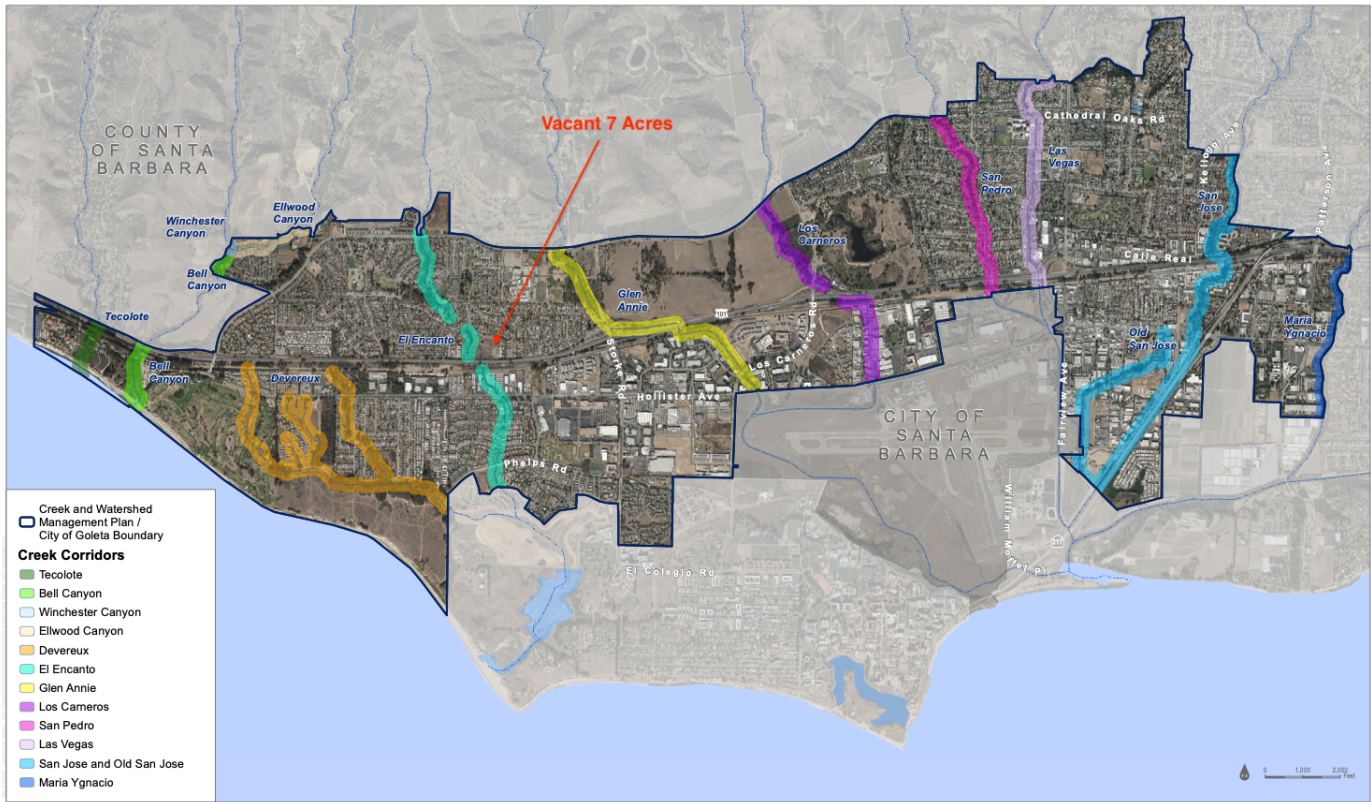
## GENERAL PLAN STREAMS AND CREEKS

Analysis of Existing vs. Proposed  
Zoning for Vacant 7 Acres

Parcel	Acreage	Commercial "Units"	Residential Units (Medium Density)	Total Units Zoned Now	Proposed (Workforce)	"Unit" Increase	Notes
7190 Hollister	3.66	29	39	68	100	32	Recommended
073-030-006 & -009	6.91	55	82	137	205	68	Vacant 7 acres
Totals	10.57	84	121	205	305	100	

EXHIBIT B

GENERAL PLAN CREEK CORRIDORS



Creek and Watershed Management Plan / City of Goleta Boundary

**Creek Corridors**

- Tecolote
- Bell Canyon
- Winchester Canyon
- Elwood Canyon
- Devereux
- El Encanto
- Glen Annie
- Los Carneros
- San Pedro
- Las Vegas
- San Jose and Old San Jose
- Maria Ygnacio

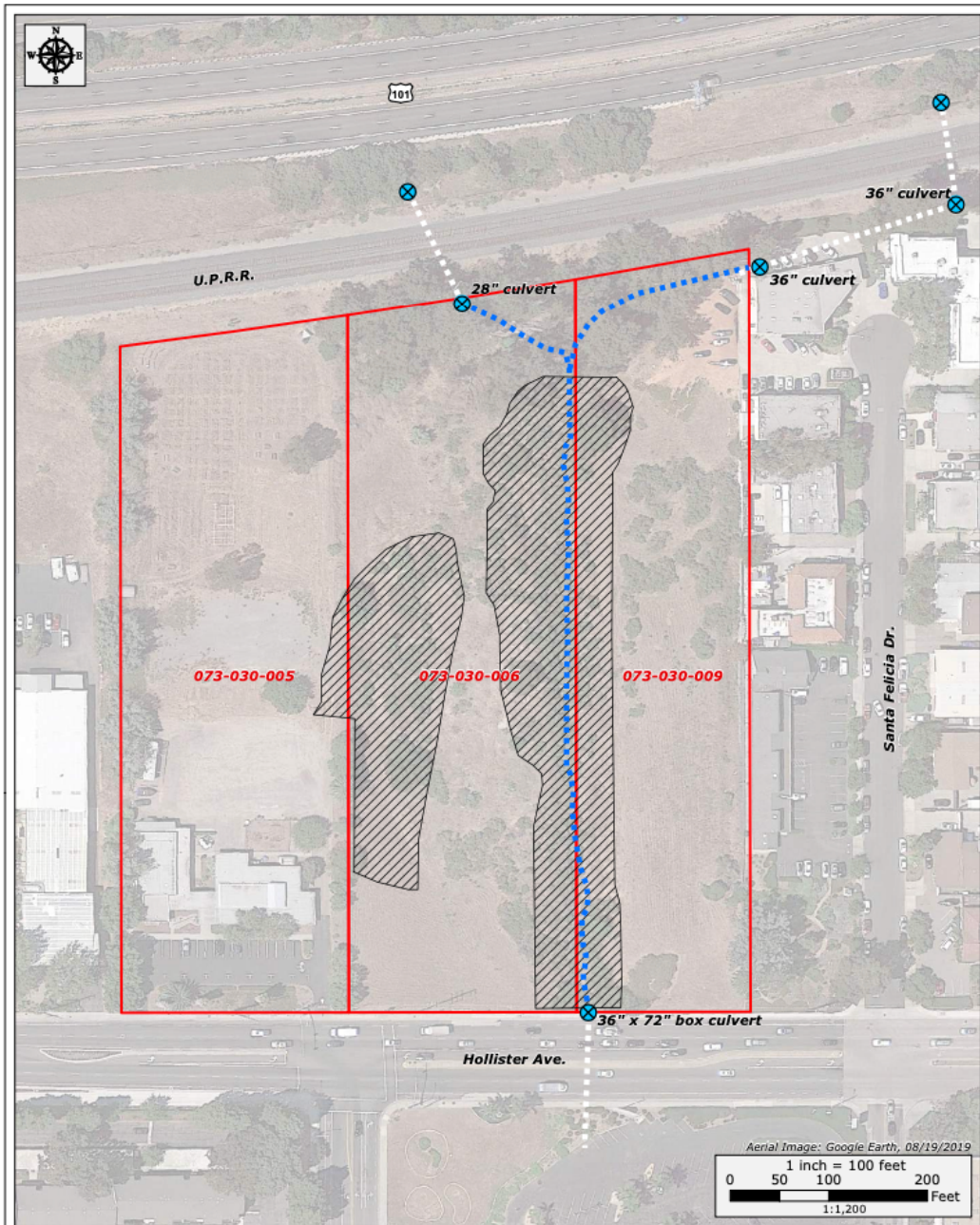


City of Goleta Creek Corridors



EXHIBIT C

“WATERCOURSES ON VACANT 7 ACRES”



**Map Items**

Property Boundaries

**Watercourse**

*(approximate flowlines and culvert locations surveyed by Watershed Environmental, Dec. 2020)*

⊗ Culvert (Inlets/Outlets)

--- Watercourse

--- Watercourse (Culverted)

**Environmentally Sensitive Habitat Area (ESHA)**

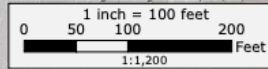
City of Goleta-mapped ESHA

*City of Goleta General Plan, June 2016:  
"Riparian/Marsh/Vernal Pool" - 1.56 acres  
"Sage Scrub/Dune/Bluff Scrub" - 0.80 acre*

**Figure 3. Existing Watercourses, and City of Goleta mapped ESHA**

**Environmentally Sensitive Habitat Evaluation & Wetland Delineation Report  
(APN: 073-030-005, -006, -009)  
Goleta, California**

Aerial Image: Google Earth, 08/19/2019



**Environmentally Sensitive Habitat Evaluation & Wetland Delineation Report  
7190 Hollister Ave. (APN: 073-030-005) & Two Adjacent Undeveloped Parcels  
(APN: 073-030-006, -009), Goleta, California**

Goleta fine sandy loam (GcA) exists on most of the 073-030-006 and -009 properties. This soil occurs on 0 to 2 percent slopes and is well-drained, has a medium runoff rate, and has a slight erosion hazard. This soil is used for irrigated crops or urban development.

Xerorthents (XA) exist along the eastern edge of the 073-030-009 property. This soil type is applied to mechanically manipulated soils where the original profile is no longer discernible. Xerorthents are classified as well-drained, but runoff and erosion hazard are variable and require on-site investigation.

## **2.4 WATERCOURSES AND WETLANDS**

The USGS Dos Pueblos Canyon, California 7.5-minute topographic map (USGS 2018), the USGS National Hydrography Dataset (USGS 2018b), and the USFWS National Wetland Inventory (USFWS 2020) do not depict any watercourses or wetlands on these three properties.

During performance of our field surveys, Watershed Environmental personnel found a watercourse with a well-defined bed, bank and ordinary high water mark (i.e., cutbank) that flows in a north-south direction along the shared boundary of the 073-030-006 and -009 properties (Figure 3). This watercourse receives sheet flow stormwater runoff from these three properties and stormwater runoff from the southbound lanes of 101 Freeway. The watercourse originates at two storm drain culvert inlet structures located within the 101 Freeway right-of-way north of the 073-030-006 property and northwest of the 073-030-009 property. The watercourse does not receive any stormwater runoff from the northbound side of the 101 Freeway or the residential neighborhoods north of the 101 Freeway.

Stormwater runoff from the 101 Freeway flows into a 28-inch diameter by approx. 125 ft. long below ground storm drain pipe under the UPRR and outlets in a eucalyptus tree grove on northern edge of the 073-030-006 property (refer to Figure 3). Stormwater runoff from the 101 Freeway also flows into a 36-inch diameter by approx. 100 ft. long below ground storm drain pipe under the UPRR and outlets into a small concrete collection basin in the northeastern corner of 70 Santa Felicia Drive and then flows into another 36-inch diameter by approx. 200 ft. long below ground culvert along the northern edge of 70 Santa Felicia Drive and northern edge of 53 Santa Felicia Drive before outletting near the northeast corner of the 073-030-009 property.

## **2.5 PREVIOUSLY MAPPED ENVIRONMENTALLY SENSITIVE HABITAT**

The City of Goleta (City of Goleta 2006) defines "Environmentally Sensitive Habitat Areas" as areas that meet the following criteria:

- a. Any area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and that could be easily disturbed or degraded by human activities and developments.
- b. Any area that includes habitat for species and plant communities recognized as threatened or endangered by the state or federal governments; plant communities recognized by the State of California (in the Terrestrial Natural Communities Inventory) as restricted in distribution and very threatened; and those habitat types of limited distribution recognized to be of particular habitat value, including wetlands, riparian vegetation, eucalyptus groves associated with monarch butterfly roosts, oak woodlands, and savannas.