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CONSULTING – LAND DEVELOPMENT – DESIGN – SURVEYING

8/28/2025

-REVISED-

Variance Justification Letter

Response Letter to Plan Checker

Subject: Request for Minor Variance at 161 Loop Road, Carlotta CA

APN: 206-111-020 **Lot Size:** 1.2 Acres **Building Footprint:** 80'x100'

Dear County Planner,

Subject: Request for Variance – Response to Code Sections 17.2.1 through 17.2.4

This letter is submitted in support of our request for a variance related to the setback under the MH zoning designation. Our parcel is bordered by three streets: "Laurel (Loop Rd.)" to the North, "Central Ave" to the East, and "Rail Road Ave." to the West. The project in question involves an existing enclosed structure on our property. We believe the following findings justify the requested variance pursuant to Code Sections 17.2.1 through 17.2.4.

17.2.1 – Exceptional or extraordinary circumstances applicable to the property or intended use:

The MH zoning designation imposes unusually large setbacks of 50 feet on both the front (East) and rear (West) property lines. These requirements are particularly restrictive given the size and layout of our parcel. While the existing structure was constructed in accordance with the required setbacks, our operations now necessitate an additional enclosed structure. The (South) side yard is not a viable option due to the neighboring property's septic field. Additionally, a Lot Line Adjustment is not feasible because of the location of the same septic field which prevents any boundary modification. The (West) rear side has the septic field for this business. Notably, the neighboring property owner to the (South) has reviewed the proposed encroachment and has expressed no opposition to the reduced setback. These unique conditions warrant relief from the strict application of the zoning code.

17.2.2 – Literal enforcement would result in practical difficulty or unnecessary hardship:

During a site visit and a discussion with Trevor on July 7, 2025, it became evident that additional enclosed space—approximately 8,000 sq.ft.—would be necessary to support recent operational changes at the facility. It was clear that new equipment related to in-house bottle production would require a dedicated dry storage area to operate efficiently and in compliance with sanitary standards.

This need stems from the unexpected closure of the plant's previous bottle supplier and the lack of viable alternatives within a reasonable transport radius. In response, the company has already acquired key blow-molding equipment and in the process of securing additional components necessary for full in-house bottle production including and not limited too; a **Tech-Long TL-20 series PET bottle blowing unit**, as well as a **SIPA automatic preform feeder and dryer system**. These systems require significant floor space not just for the equipment itself, but for the staging and storage of raw PET preforms, molds, finished bottles, and associated packaging materials such as caps, labels, and pallets.

The existing building layout cannot accommodate these functions without displacing other critical operations or creating workflow bottlenecks. The proposed expansion would house:

- Palletized storage of PET preforms (up to 12 pallets at a time)
- Bottle curing and cooling area post-blow molding
- Racking for finished bottles prior to filling
- Space for ancillary equipment such as air compressors, mold tooling, and QA testing benches
- Both buildings will be on the same grade, connected with shared access and a common loading/unloading ramp to ensure a contiguous workflow.
- The North section of the existing building will have convenient road access from both Railroad Avenue and Central Avenue.

Without this additional enclosed space, the facility would be forced to resort to external storage containers or off-site warehousing—both of which introduce security concerns, risk product contamination, and increase transportation and labor costs. These inefficiencies would pose an undue hardship on a facility whose operations rely on cleanliness, efficiency, and reliability to meet regulatory standards and customer expectations.

Strict adherence to existing MH zoning setbacks makes it physically impractical to locate this space elsewhere on the property. The requested variance allows the business to make a necessary operational adaptation without increasing staffing, traffic, or public impact. The addition is strictly functional, supporting internal production needs and maintaining a compact footprint consistent with the character of the surrounding district. Granting this variance would ensure the long-term viability of the water plant in light of shifting supply chain realities, while preserving the intent of local zoning guidelines.

17.2.3 – No grant of special privilege:

The variance does not constitute a grant of special privilege. The enclosed structure is consistent with allowable uses in the MH zone and will be used solely in support of existing on-site activities. The relief we seek is specific to our parcel's physical limitations and operational needs and does not allow any use or structure that is not otherwise permitted in this zoning district. Other similarly situated properties could request similar relief under comparable circumstances.

17.2.4 – No material detriment to public health, safety, or welfare:

The proposed enclosed structure will not negatively impact public health, safety, or welfare. It will be constructed in full compliance with all applicable building codes and will not introduce any objectionable odors or noise. Additionally, it is not expected to result in any new employees or increased traffic. The structure will be visually consistent with surrounding development and will not include windows, doors, or openings on the side with the requested setback, ensuring that adjacent property access, utilities, and visibility are not affected.

We respectfully request that the Planning Department consider this justification and approve the variance request. If you have any questions concerning this letter, please call our office at (707) 725-5182.

Sincerely,



Allan M. Baird
Principal