



Citizens Planning Association

**COMMENT LETTERS & STATEMENTS**

**December 6, 2008 – January 12, 2009**

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**Plan Santa Barbara (General Plan Update)**

12/12/08 General Plan Update Committee letter to SB City Council

December 12, 2008

TO: Santa Barbara City Council  
FROM: Citizens Planning Association -- General Plan Update Committee  
RE: Revised Draft Policy Preferences of December 2008

CPA's General Plan Update Committee has reviewed the latest Draft Policy Preferences document with great interest. In general, we welcome those policy preferences which promote "living within our resources" well into the foreseeable future and also show credible promise to improve our jobs/housing balance. By contrast, we hope that policy preferences adverse to those overarching goals will be modified or abandoned in the next phases of the Plan Santa Barbara process.

Since the inception of the Plan Santa Barbara process, we have submitted numerous comments and recommendations including a well-received comprehensive booklet dated May 2008. The present follow-up to previously submitted materials concentrates on three clusters of topics: (1) commercial and residential growth, (2) environmental sustainability and public health, and (3) historical and aesthetic resources and their impact on economic sustainability.

1. Nonresidential and Residential Growth

Almost any nonresidential growth would increase the number of commuting employees, and the city's commuting workforce would be further increased by the service needs of people purchasing newly built market rate housing. Therefore, we urge that

- (a) the existing Measure E restrictions be renewed with enhanced vigor so that nonresidential growth is capped at a total of one and a half million square feet including all relevant categories, and that
- (b) residential growth be capped at 40,005 units and be geared to affordable housing to the greatest extent feasible.

As an incentive for the production of housing affordable to low, moderate, and middle-income workers, we recommend that current density standards be raised for attractive projects with 100% rental or re-sale restricted affordable units. For developments with less community benefit, we don't support the weakening of current density and parking requirements as proposed, for instance, in certain portions of H5 on p. 54, H 12 and H14 on p. 55, and C18 on p.59. We believe that Casa de las Fuentes at Carrillo and Castillo is a good example of the excellent use that can be made of very high density: 57 dwelling units per acre within a 34-foot three-story building with generous setbacks.

2. Environmental Sustainability and Public Health

Various dimensions of this huge topic were addressed in our 18-page booklet referenced above. The present letter focuses on just two aspects (traffic-related air pollution and outdoor noise guidelines) in the specific context of the Draft Policy Preferences. A much fuller and extensively documented account of our views on air pollution can be found at <[www.citizensplanning.org](http://www.citizensplanning.org)> under Issues and

Events (see "CPA's Proposed Updates for the City of SB's Conservation Element's Air Quality Chapter" and "Attached Abstracts").

We are pleased with the proposed policy that calls for a 500-foot set-back from Highway 101 and for funding a program "to monitor emission levels and identify a more refined set-back line" (ER12 on p.43). But we remain concerned about the lack of site-specific monitoring of air quality in those parts of the proposed Mobility Oriented Development Area which lie further away from the highway.

The siting of residential buildings near heavy stop-and-go traffic should not be advocated on the assumption that increasing urban density would decrease air pollution. To the contrary:

"On a very localized scale -- alongside a street in a particular neighborhood -- greater traffic density could increase exposure to pollutants, especially [...] particulate matter and air toxics. [...] One study [...] found that people who live near busy streets (defined as carrying more than 10,000 vehicles per day) were exposed to two-to-threefold higher levels of 'black smoke' (a measure of particulate matter), NO<sub>x</sub>, and carbon monoxide, compared to people who lived near a less busy street." *Urban Sprawl and Public Health* by Howard Frumkin, Lawrence Frank, and Richard Jackson, p.76-77).

Given the proven health impacts of traffic-generated air pollution, especially on children and other sensitive receptors, a responsible land use plan for our downtown and other commercial areas must include the monitoring of their air quality with a view to

- (a) determining the relatively safe distance of residential developments from particular traffic corridors, and
- (b) establishing site-specific requirements for generous landscaped setbacks.

Adequate setbacks would also lessen the motivation for the proposed questionable change from 60 to 65 decibel in the Noise Element's Compatibility Guidelines for the average outdoor noise level in residential land uses (see ER37 on p.47). We note that the relaxed noise standards would significantly increase future energy consumption because many more units would be built whose residents would feel constrained to keep their windows closed and their air conditioners turned on.

### 3. Historical and Esthetic Resources and Their Impact on Economic Sustainability

On page 50 of the Draft Policy Preferences report, CH1 should be dropped. It calls for "adjusting the boundaries" of the El Pueblo Viejo Landmark District.

The boundaries of the district are included in the City Charter now. Their intent is not only to protect existing historic resources, but to continue the existence of Santa Barbara's famed architectural styles, the styles that relate directly to our heritage. The district assures that the historic character of Santa Barbara is maintained in the downtown, waterfront, and mission areas with higher standards of adherence to the City's unique neo-colonial Spanish and Californian building styles. There is no need for a different Downtown Design District.

Furthermore, we are disappointed by the lack of detail in the policies proposed for the appreciation and preservation of historical and archaeological resources. Santa Barbara has a rich historical legacy. Current goals and policies call for its protection and preservation. Any new ones should be at least as strong and elaborate on what is already outlined in existing documents.

Likewise, the proposed policies concerning Aesthetics and Visual Resources take good steps toward worthy goals without sufficient clarification of significant details. It should be explicitly stated, for example, that new developments shall preserve public scenic views. They should also maintain or, if possible, enhance the existing degree of openness, naturalness, and relative lack of congestion.

Our city's beauty and attractive historic legacy are significant for more than purely esthetic reasons. They contribute significantly to Santa Barbara's financial health as well. For example, to retain revenues stemming from tourism and retirement income, the city must remain competitive with other attractive locations by protecting and enhancing its special qualities. Similarly, we oppose any blanket lowering of the current on-site parking standards because parking shortage in commercial areas would result both in less convenience for residents and visitors and in decreased sales tax revenues due to increased out-of-town and internet shopping.

Last but not least, public safety is another important consideration for maintaining Santa Barbara's prestige as an attractive tourist and retirement destination. We urge that the EIR explore whether our police and fire departments are adequately staffed and equipped for a growing city whose daytime population (local residents plus commuters and tourists) is significantly larger than the 90,000 plus people who are acknowledged to live here. We note that the daily influx of our nonresident population oscillates between 40,000 and 100,000 people (see the Conditions, Trends, and Issues report of August 2005, p. 152 of 350).

We thank you very much in advance for your attention to our input.

**101 E. Victoria St. (Appeal)**

12/23/08 South County Land Use Committee letter to SB City Council

23 December 2008

Mayor Blum & City Council members  
Santa Barbara City Council

*Sent via email to [kkennedy@santabarbaraca.gov](mailto:kkennedy@santabarbaraca.gov)*

**RE: 101 E. Victoria Appeal**

Dear Mayor Blum & Council members,

The Citizens Planning Association's South Coast Land Use Committee urges you to **support the appeal** of the proposed development at 101 East Victoria Street in Santa Barbara's upper downtown.

No matter how dire the City's short-term financial situation may be, there's no hint in Measure E whatever that a spec office condo project is either a "Community Priority" or a "Community Need." Attempting to classify this project that way to exempt it from analysis of its potential impacts is ridiculous.

With the City prioritizing "sustainable development and design", the whole concept of an office condo project at this location is heading in the *wrong* direction for conservation of scarce resources.

With several dozen "independent" office condo units, *each* must then have its own entry, its own plumbing, its own bathroom facilities, making "economies of scale" almost impossible at the site. Think how much less space a similar office building could have with *shared* internal corridors, *shared* reception and office equipment/utilities functions, *shared* bathroom and sink fixtures on each floor.

Moving in that direction would not only be more sustainable, but could also reduce the proposed size-bulk-scale and neighborhood compatibility concerns while allowing for better landscaping without diminishing the building's actual "internal work space."

Given the number of condo office owners, their office personnel, and customers-clients, there could easily be a serious on-site parking shortfall. That could add to congestion on the surrounding streets, and quickly consume very limited remaining on-street temporary parking in the upper downtown, and add more pressure to the City's famed "75 minute shuffle."

When we add these concerns to the large, boxy feel of the project, with its limited setback and modest landscaping, CPA believes there are grounds to **uphold the appeal** and to **refer the project back to the Planning Commission and ABR**. That way Planning Commission, ABR and city staff can work with the developer to **reduce, mitigate, or eliminate these areas of concern and create an even better project, more suitable to its location, and Santa Barbara's sustainability goals.**

Thank you for your consideration.

Sincerely,

Naomi Kovacs, Executive Director

**3885 State Street**

1/2/09 South County Land Use Committee letter to SB Planning Commission  
1/8/09 South County Land Use Committee statement to SB Planning Commission  
(Statement summarizing letter presented by Paul Hernadi, CPA Board & LUC member)

January 2, 2009

TO: Planning Commission, City of Santa Barbara  
FROM: Citizens Planning Association -- South Coast Land Use Committee  
RE: Development proposal for 3885 State Street

Citizens Planning Association's South Coast Land Use Committee is pleased with most changes that this project has undergone since February 28, 2006, when City Council upheld our appeal of the approval of the project's first incarnation. But we continue to have some old, as well as some new, concerns about density, community benefit, and environmental issues.

1. **Density:** We appreciate that the project's bulk, size, and scale have been reduced and that the originally proposed 55 one-bedroom units have turned into 30 two- and three-bedroom units -- a more family-friendly design. But the project's over-all density with a total of 64 bedrooms remains too dense for the available building envelope. The claim to justify the proposed density partly stems from the problematic inclusion of the so-called "driveway easement" into the site's "net square footage," which is asserted to be 1.42 acres even though the total "site square footage" is only 1.43 acres. Please note that the easement in question is a fully fledged alley that runs between State Street and La Cumbre Lane, has been used for through-traffic for several decades, and will serve as the only access road to the proposed project. Its inclusion into density calculations was already challenged by the appellants in 2006 and attracted continued adverse attention from several planning commissioners since then. **Under the circumstances, we request that Planning Commission address the likely inappropriateness of the inclusion and consider initiating a review of any policy that may have induced the applicant to propose, and planning staff to sanction, the inclusion.**

**2. Community benefit:** We regret that the reduction of the project's size, bulk, and scale is partly achieved by the reduction of the number of inclusionary units from 17 to the minimally required 4. By contrast, a laudable reduction of traffic impact and parking demand can be attributed to the significant decrease in commercial space from about 8,800 square feet to about 2,600 square feet. Unfortunately, however, this decrease is partly counterbalanced by providing 3,863 square feet of "common amenities" (exercise room, sun room, spa, concierge, formal dining room with wine storage and staging kitchen) and a 545-square-foot "crafts room" for enrichment classes, after-school programming, community art programs, and special events (see the application letter dated August 1, 2008). It is true that subsequent application letters (dated September 18 and November 21, 2008) assert that the "classroom/crafts room facility would not be available for rental to non-residents." Even so, it appears likely that both the craft room and some other "amenities" will often attract individuals and groups not residing in the condominiums. Hence the claimed large reduction in traffic and parking demand, which could possibly count as a community benefit given the already congested traffic conditions in the Upper State Street area, will not be fully realized.

In any event, the residential or nonresidential status of the proposed craft room and other amenities is remarkably unclear. On the one hand, the application statistics ignore the possible *nonresidential*

traffic and parking demand generated by the amenities. On the other hand, the over 4,400-square-foot space occupied by the amenities and the craft room will benefit the initial seller and subsequent owners of the market-rate residential units without affecting the number of *re-sale restricted dwelling units*. Moreover, the amenities will be operated and maintained from monthly dues collected from the market-rate units and will only be available to the residents of the affordable units "on a fee for service basis." **We request that Planning Commission address the traffic, parking, and social equity issues raised by the amenities in the context of their general policy implications. For example, should claims for Transfer of Existing Development Rights be deemed legitimate if a large complex of "amenities" rather than actual housing replaces commercial space in mixed-use projects?**

**3. Environment:** The Environmental Noise Study dated April 11, 2005, was updated in a shorter document dated July 31, 2008, with a brief Addendum dated November 11, 2008. Unfortunately, all these documents are based on the outdated figures quoted in 2005 from the "Traffic Volume Data for the Montecito Del Mar Project," a study prepared by the Associated Traffic Engineers and dated January 19, 2005. The ATE study in question *forecasts for the year 2025* that "State Street south [i.e., east] of La Cumbre Road would carry approximately 27,100 ADT." Yet, *already in February 2007*, the Upper State Street Traffic, Circulation, and Parking Study credited the same stretch of State Street with at least that much traffic (p.8): "The Average Daily Traffic (ADT) on the remaining portions of State Street west of Las Positas Road generally ranges from 24,400 to 30,800 vehicles per day." Similar anachronism affects the reported results of actual ambient noise monitoring: the July 31, 2008, update (p. 5, table 1), simply reproduces previously reported figures based on readings taken on February 15, 2005.

Given the uptown business district's steadily increasing traffic, we believe that a 2009 noise study should be substituted for the rather cursory update of 2008. After all, even that update (p. 9) already describes three residences directly facing State Street as requiring "mechanical ventilation and /or air conditioning" because their "windows and doors must be closed in order to achieve the interior noise criteria" applied by the State of California. We trust that a more up-to-date and more sustainability-minded noise study would propose fundamental design changes aiming to avoid or minimize the need for such energy-wasting mitigations. **We request that Planning Commission require a new Environmental Noise Study and enforce compliance with it by means of design changes rather than mitigating measures that involve closed windows and mechanical ventilation or air conditioning. Furthermore, given the area's traffic-generated noise level, we urge that the safe distance of residential units from State Street should also be evaluated with the health impacts of traffic-generated air pollution in mind. Indeed, the approval of a massive residential development along what is probably the busiest segment of the city's busiest traffic corridor should be preceded by site-specific air quality measurements in the immediate vicinity.**

We thank you in advance for considering our input.