



Citizens Planning Association

**COMMENT LETTERS**

**February 7 – February 26, 2009**

This document includes:

- a. **El Encanto Hotel** (City of SB)  
2/10/09 South County Land Use Committee letter to Planning Commission
- b. **Plan Santa Barbara – EIR Scoping** (City of SB)  
2/12/09 General Plan Update Committee letter to Environmental Analyst

**El Encanto Hotel**

2/10/09 South County Land Use Committee letter to SB Planning Commission

10 February 2009

Chair Larson & Commissioners  
Santa Barbara Planning Commission  
Post Office Box 1990  
Santa Barbara, CA 93102-1990

*Sent via email to: PCSecretary@santabarbaraca.gov*

**RE: El Encanto Hotel**

Dear Chair Larson & Commissioners,

The Citizens Planning Association's South County Land Use Committee urges you to reject staff's recommendation on the El Encanto Hotel project and direct that an Environmental Impact Report (EIR) be prepared for this project. We believe that this project has the potential to cause significant impacts from land-use conflicts and historical resources. We are concerned that residents living near the site will be substantially and adversely affected by the project and that elements of the project should be redesigned.

This project is the latest in a series of improperly piecemealed City approvals on this site. Approving this project, with its many modifications and ignoring past cumulative changes to the site, sets an unfavorable precedent and encourages others to similarly "game the process." We have observed a practice where applicants first apply for one minor entitlement, then expand on that through serial modifications and substantial conformity determinations. This practice cannot be condoned.

The El Encanto Hotel is a recognized historic site, but its historic elements and character have been gradually demolished and modified. The historical landscape design has been lost. A historical landscape study is warranted.

The proposed approval does not comply with Measure E, which limits small and minor additions to a maximum of 3,000 square feet. Measure E does not allow approval of a 7,021 square foot increase on this site.

We oppose all of the proposed modifications, and echo concerns stated by residents living near the site. The city can do better, and **we encourage your Commission to direct the preparation of an EIR and encourage reconsideration of the site's proposed design to reduce the intensity of development in the northwest corner.**

Thank you in advance for your consideration.

Sincerely,

Naomi Kovacs  
Executive Director

**Plan Santa Barbara (General Plan Update) – EIR Scoping**

2/12/09 General Plan Update Committee letter to City of Santa Barbara's Environmental Analyst

12 February 2009

Barbara Shelton, Project Planner & Environmental Analyst  
Community Development Department  
630 Garden Street  
Santa Barbara, CA

*Sent via email to: bshelton@santabarbaraca.gov*

**Re: Scoping Comments for the Plan Santa Barbara Draft EIR**

Dear Ms. Shelton,

The Citizens Planning Association's General Plan Update Committee urges that the proposed EIR's scope of analysis include the following concerns:

1. Actual population size affecting natural and infrastructural resources
2. Benchmarks for adaptive management goals
3. Demolitions in an almost built-out city
4. Some risks of incentivizing secondary units
5. Some risks of incentivizing increased density near heavy traffic
6. Cumulative impacts of regional traffic and air pollution
7. Preservation and protection of historical and archeological resources

**1. Actual population size affecting natural and infrastructural resources**

According to the "Conditions, Trends, and Issues" report of August 2005, p. 152 of 350, Santa Barbara's daily influx of nonresident population oscillates between 40,000 and 100,000 people. These numbers indicate that our "daytime population" (local residents plus commuters and tourists) is much larger than the 90,000 plus people who are acknowledged to live in the city. Furthermore, many tourists, numerous commuters, and quite a few homeless people spend even the nights in local hotels, rented rooms, temporary shelters, parked vehicles, or in streets and parks. All this should be taken into account when Chapters 14 and 15 of the EIR analyze the existing conditions and various growth scenarios in terms of public facilities (water supply, waste water, solid waste disposal, utilities) and public services (police, fire protection, parks, etc).

Likewise, the actual size of the population should be addressed by Chapters 11 and 16 in their respective analyses of water resources and of road capacity for routine transportation as well as emergency services and evacuations.

**2. Benchmarks for adaptive management goals**

We urge that the EIR propose environmentally sound bench marks for the "adaptive management" of various growth scenarios. Both the annually permissible new commercial square footage and the annually permissible number of new market rate dwelling units can then be calculated according to the progress made or not made toward such goals as improved jobs/housing balance and enhanced social equity. Particularly important is to monitor the respective shares of new

housing affordable to our very low, low, moderate, and middle income workforce and to other city residents with special needs.

The bench marks should also help to keep the implementation of Plan Santa Barbara policies from exceeding, by 2030, the Project's stated limits of 2.2 million SF and 3,200 DU because the unchecked implementation of those policies could prematurely realize the Extended Range Alternative (3.2 million square feet of nonresidential growth and 8,600 dwelling units by 2050). The monitoring of growth should be coordinated with the monitoring of changes in resource availability -- for example, whether sufficient funds have been appropriated to enhance public transportation, increase sewer capacity, or improve the quality of recycled water.

As for desalination, we support the Water Commission's unanimous recommendation not to consider the now dormant plant as contributing to the "base line" of available water resources since no funding allocation has been made for its very costly refurbishing and subsequent operation.

### **3. Demolitions in an almost built-out city**

Since Santa Barbara is largely built out, most construction projects target "underutilized" parcels and begin with partial or complete demolition. The environmental impact of various growth scenarios should be analyzed with such factors in mind as the solid waste, the traffic congestion, and the air and noise pollution generated by demolition activities even before any new construction can begin. The potential adverse impact of some demolitions on neighborhood character and historical/archaeological resources should also be considered in Chapters 10 and 13 of the EIR.

### **4. Some risks of incentivizing secondary units**

The EIR should weigh any possible benefits of incentivizing secondary dwelling units in single-family neighborhoods (see H 14 of the Draft Policy Preferences) against at least three disadvantages:

- The likely proliferation of market-rate rentals if affordability and the tenant's meeting of eligibility criteria were no longer required;
- The likely increase in per-unit water, gas, and electricity consumption if the requirement were dropped that each unit have its separate meters;
- The impact on the historically established character of neighborhoods if the current onsite parking and attached unit requirements were eliminated; and
- The impacts of imposing the proposed Mobility Oriented Development Areas (MODAs) and potential secondary dwelling unit locations on many of the city's single family residence zoned areas, effectively eliminating them, and, by extension, the impacts on its environment, character and reputation as a desirable residential community that lives within its resources.

### **5. Some risks of incentivizing increased density near heavy traffic**

The EIR should weigh any possible benefits of increasing the allowable density in the MODA against the possible disadvantages of such a change to the Municipal Code. Two examples: (1) the residents of dense housing near increased slow and stop-and-go traffic would be exposed to the scientifically demonstrated harmful effects of increased air pollution, and (2) the same applies to pedestrians and cyclists who regularly traverse the impacted areas.<sup>1</sup> Mitigating measures such as generously landscaped sizable setbacks and other open spaces should be required in locations where densification is proposed yet site-specific air quality measurements indicate potential danger to public health.

## 6. Cumulative impacts of regional traffic and air pollution

The EIR should evaluate the traffic and air quality impacts of the city's proposed growth in the CUMULATIVE context of predictable growth in relevant areas outside the city. Three examples:

- Our highways and surface streets would become more impacted by increased population density in other South Coast communities and even in such more distant locations as Ventura and Santa Maria. This is the price we pay for Santa Barbara's attractiveness as a place replete with jobs, stores, shops, health care facilities, governmental offices, and cultural events.
- Highway 101 serves through-traffic between southern and northern California. So any increase in the state's population would increase the number of vehicles passing through and motivating local drivers to use surface streets in greater numbers.
- Ocean shipping is predicted to increase in the coming decades and will make the air especially unhealthy near the ever more congested surface streets of our coastal city.

Such impacts need to be weighed by the EIR against any possible future improvements in emission controls, the city's jobs/housing balance, and alternative transportation.

## 7. Preservation and protection of historical and archeological resources

Santa Barbara is special among our nation's communities. The 226-year-old city has been in the forefront of historic preservation activities for 50 years. As the latest of many such recognitions, the National Trust for Historic Preservation recently named this city as one of America's Dozen Distinctive Destinations. Santa Barbara's history is integral to the city's identity, cultural activities, economic health, and physical appearance. Therefore, Chapter 10.0 of the EIR should stress (a) the desirability of continued historic preservation and (b) the need to consider impacts on historical and archaeological resources caused by policy options and growth scenarios.

We thank you in advance for your consideration.

Sincerely,

Naomi Kovacs  
Executive Director

-----  
<sup>1</sup> See, for instance, Howard Frumkin, Lawrence Frank, and Richard Jackson, *Urban Sprawl and Public Health: Designing, Planning, and Building for Healthy Communities* (Washington D.C.: Island Press, 2004), pp. 76 -77, and J.E.Sharman et al, "Cardiovascular Implications of Exposure to Traffic Air Pollution during Exercise," *Q J Med* (2004) 97: 637-643. Further documentation is provided at <[www.citizensplanning.org](http://www.citizensplanning.org)> under Issues and Events ("CPA's Proposed Updates for the City of SB's Conservation Element's Air Quality Chapter" and "Attached Abstracts").