



Citizens Planning Association

COMMENT LETTERS & STATEMENTS

January 13 – February 6, 2009

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1/25/09 General Plan Update Committee letter to staff & Planning Commission
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- b. **Plan Santa Barbara – EIR Scoping - Transportation Modeling (City of SB)**
2/6/09 Comprehensive Planning Committee letter to Environmental Analyst

Plan Santa Barbara (General Plan Update)

1/25/09 General Plan Update Committee (GPUC) letter to staff & SB Planning Commission
1/29/09 GPUC statement to Planning Commission

*(Statement summarizing highlights of letter presented in 3 segments by
Naomi Kovacs (Executive Director), Paul Hernadi (GPUC & CPA Board Member)
& Mary Louise Days (GPUC Chair & CPA Board member)*

DATE: January 25, 2009

TO: Barbara Shelton and Planning Commissioners

FROM: General Plan Update Committee, Citizens Planning Association

Re: Comments for the EIR scoping hearing of January 29, 2009

Our 12-12-08 memo to City Council, reproduced on YouPlanSB.org as pp. 87-90 of "Public Correspondence for 12-11 and 12-18-08 City Council Meeting," addressed three sets of issues with bearing on Plan Santa Barbara's environmental impact:

1. Residential and Nonresidential Growth
2. Environmental Sustainability and Public Health
3. Historical and Esthetic Resources and Their Impact on Economic Sustainability

In the present memo we urge that the proposed EIR's scope of analysis include the following specific 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
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1. 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 and emergency evacuations.
 2. Environmentally sound bench marks should be established for the "adaptive management" of the nonresidential and residential growth scenarios so that the annually permissible size and number of new developments can be conditioned according to the progress made or not made toward such goals as improved jobs/housing balance and enhanced social equity. Particularly important is the monitoring of the respective proportions of recently completed or proposed dwelling units affordable to our very low, low, moderate, and middle income workforce and to other city residents

with special needs. The bench marks should reflect the need to clarify how the implementation of Plan Santa Barbara policies, which are said to underlie the Extended Range Alternative (3.2 million square feet of nonresidential growth and 8,600 dwelling units by 2050), will be prevented from exceeding the Project's stated limits of 2.2 million SF and 3,200 DU within the time horizon up to 2030.

3. 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 as distinct from the activities of new construction. The potential adverse impact of some demolitions on neighborhood character and historical/archaeological resources (see Chapters 10 and 13 of the EIR table of contents) should also be considered.
4. The EIR should weigh any possible environmental benefits of incentivizing secondary dwelling units in single-family neighborhoods against the possible environmental disadvantages of implementing H 14 of the Draft Policy Preferences, p. 55. In particular, the EIR should address (a) the likely proliferation of market-rate rentals if affordability and the tenant's meeting of eligibility criteria are no longer required; (b) the likely increase in per-unit water, gas, and electricity consumption if the requirement is dropped that each unit have its separate meters; and (c) the impact on the historically established character of neighborhoods if the current onsite parking and attached unit requirements were eliminated.
5. The EIR should weigh any possible environmental benefits of increasing the allowable density in the Mobility Oriented Development Area against the possible environmental disadvantages of such a change to the Municipal Code. Two examples: 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 the same applies to pedestrians and cyclists who regularly traverse the impacted areas.¹ 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. The EIR should evaluate the traffic and air quality impacts of the city's own growth in the CUMULATIVE context of predictable growth in relevant areas outside the city. Some examples: (a) Our highways and surface streets would become more impacted by increased population density not only within the city but also on the South Coast 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. (b) 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. (c) Aviation and especially ocean shipping are predicted to increase in the coming decades and will make the air especially unhealthy to breathe in and near our ever more congested surface streets. Such near-certain impacts need to be carefully weighed by the EIR against any possible future improvements in emission controls, the city's jobs/housing balance, and alternative transportation.
7. Santa Barbara is special among our nation's communities. As the latest of many such recognitions, the National Trust for Historic Preservation recently named us 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 of the EIR should

stress (a) the desirability of continued historic preservation and (b) the need to expand the policy framework currently proposed for the preservation and protection of our heritage. Other pertinent chapters should also address any and all likely impacts on our historical and archaeological resources.

We thank you in advance for your consideration.

Plan Santa Barbara (General Plan Update) – EIR Scoping – Transportation Modeling

2/6/09 Comprehensive Planning Committee letter to Environmental Analyst

6 February 2009

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

Sent via email to: BShelton@santabarbaraca.gov

Re: Plan Santa Barbara EIR Scoping – Transportation Modeling

Dear Ms. Shelton,

I am writing on behalf of the Citizens Planning Association's (CPA) Comprehensive Planning Committee. It is our understanding that the results of the Transportation Modeling Project, about which we have expressed various concerns since August 2008,ⁱ will be integrated into the Plan Santa Barbara Draft EIR. Hence we recapitulate three such concerns below and urge that they be addressed in the Draft EIR, especially (but not only) if it incorporates specific data or conclusions from the Transportation Modeling Project.

1. The review of existing conditions and the analyses of various growth scenarios should include quantifiable data about mid-block traffic congestion in all commercial and transit corridors targeted for major new developments.ⁱⁱ
2. It should be clearly stated which methodologies were chosen for counting average daily trips (ADT) and for assigning level of service (LOS) grades. The reasons why the chosen methodologies were given preference by the EIR should also be stated, especially when conflicting data have been gathered and reported by two or more consultants about the same street or intersection.ⁱⁱⁱ
3. The EIR consultant, as well as the Modeling Project consultant whose website claims adherence to "Smart Growth" principles, should be asked to provide a *balanced* summary and bibliography of pertinent research. The EIR's approach and conclusions should take into account a range of pertinent studies including some that document the health risks involved with locating dense residential buildings near the heavy stop-and-go traffic of commercial and transit corridors.^{iv}

We trust that the DEIR being prepared under your leadership will be responsive to the above comments.

Sincerely,

Paul Hernadi, Chair
CPA Comprehensive Planning Committee

End notes

¹ 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> under Issues and Events ("CPA's Proposed Updates for the City of SB's Conservation Element's Air Quality Chapter" and "Attached Abstracts").

ⁱ See our letter dated August 26, 2008, to the Planning Commission and to the Transportation and Circulation Committee, as well as the subsequent pertinent correspondence with Rob Dayton and other city officials, mostly cc'd to you.

ⁱⁱ Average Daily Trips counts and Level of Service grades based on intersection turning movement counts fail to reflect the actual mid-block congestion in the heavily traveled commercial streets of the proposed Mobility Oriented Development Area because they ignore:

- the number and purpose of curb cuts between intersections;
- the distance between intersections and major curb cuts;
- the distance between intersections and bus stops;
- the important distinctions among different types of motor vehicles (cars, SUV's, trucks, buses, 18-wheelers); and
- the number of wheelchairs, bicycles, and pedestrians crossing at a particular intersection.

We urge, therefore, that the data collected about average daily trips and about vehicular traffic at intersections be correlated with the typical length of time it takes vehicles to travel from one intersection to the next at various times of day and on different days of the week, with particular attention paid to Fridays and the peak shopping weeks of the year between mid-November and early January. In addition, the length of time pedestrians and bikers are typically made to wait before crossing particular intersections should also be considered as a measure of traffic congestion. Furthermore, the figures about pedestrian-involved accidents reported to police (428 between 1998 and 2002) should be updated with data covering the last 5 or 6 years.

ⁱⁱⁱ The Transportation Modeling consultant's recent "Transportation Existing Conditions Report" (TECR) does acknowledge the significance of the Upper State Street Study (March 2007) but seems to ignore, or dismiss without argument, some essential data compiled for that study in the "Upper State Street Traffic, Circulation, and Parking Study" (TCPS) of February 2007, prepared by another consultant. For example, p. 8 of the 2007 TCPS listed 32,000 as the daily motor vehicle traffic volume just east of Las Positas Road; it also stated that the Average Daily Trips (ADT) on "State Street west of Las Positas Road generally range from 24,400 to 30,800 vehicles per day." By contrast, the highest State Street traffic volume identified on Figure 3-5 (after p.16) of the 2008 TECR is 21,160 vehicles per day, and no figures are listed on the map or in any other part of the report for the corridor's most heavily traveled segment between Highway 101 and De la Vina Street.

Similar discrepancies can be found in the evaluation of several pertinent intersections. The 2007 TCPS (p. 24) assigned the grade C to the existing P.M. peak hour Level of Service at the State/La Cumbre, State/Hope, and State/Hitchcock intersections. By contrast, the 2008 TECR (p.16) lists the P.M. peak hour Level of Service at the three respective intersections as D, B, and B. As for other

times of the day, the two reports supply us with apples and oranges: Focusing on the A.M. peak hour, the 2008 TECR (p. 16) assigns A grades to all three intersections while the 2007 TCPC (p. 24) evaluated the midday peak hour traffic (which is much more relevant for a commercial corridor) as B, C, and B, respectively.

iv For example, the EIR should expressly recognize that "slow-moving vehicles and vehicles in stop-and-go conditions generate substantially higher emissions per vehicle-mile than do vehicles traveling at cruising speeds of 50 to 70 mph." (See p. 8 of *Predicting Air Quality Effects of Traffic-Flow Improvements: Final Report and User's Guide*, published by the National Cooperative Highway Research Program in 2006 as *Nchrp Report 535*.) Furthermore, the siting of residential buildings near heavy stop-and-go traffic should not be advocated on the unproven assumption that increasing urban density would decrease local traffic and air pollution. Even some strong opponents of sprawl recognize that "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_x, 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, pp.76-77). Much additional information and documentation can be found at 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").