



Citizens Planning Association

COMMENT LETTERS & STATEMENTS

October 24 – December 14, 2009

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Plan Santa Barbara – Traffic Model Results

10/22/09 South County Land Use Committee (LUC) statement to SB City Planning Commission
& Transportation and Circulation Committee

Statement made by Paul Hernadi (CPA Board, LUC member) & Naomi Kovacs (CPA Exec. Director)

Good evening Chair Larson, Chair Pritchett, Commissioners and TCC Members,

I'm Paul Hernadi, speaking on behalf of the Citizens Planning Association's South County Land Use Committee. Perhaps the most important request we would like to make tonight is that you give us and other members of the public a few more days to submit written comments on the consultant's presentation we have just heard before you make up your minds about the merits and demerits of the Travel Model Results that were presented tonight.

Prior to this evening's work session, our committee discussed the very recent staff report and even more recent Summary of Existing and Future Intersection Levels of Service. Based on those documents, we have the following questions:

1. Why is the summary given in terms of LOS grades instead of the underlying quantitative terms of Volume to Capacity ratios, which are much more precise? Using the more precise measurements would have been especially important within grade C because of the city's environmentally relevant target for signalized intersections is 0.77 or better.
2. Will the occasional discrepancies between the LOS grades cited for existing conditions in the modeling project and earlier studies be explained and justified? (We will provide examples in our written submission.)
3. Is the frame of reference provided by intersection levels of service subtle enough to capture actual traffic conditions in transit corridors through commercial areas where frequent curb cuts and bus stops result in stop-and-go traffic and mid-block congestion?
4. What assumptions were used regarding the availability of sufficient funds to "expand pedestrian and bike paths" and to "support local and regional transit" under the various scenarios?
5. With regard to local transit, what assumptions were used regarding MTD, its services, and its funding?
6. There is reference to local and regional transit and TDM programs. Which, specifically, are they?
7. With regard to multi-modal transportation, exactly what kind of city "support" is intended and to what degree? Is it financial, other, or both?
8. For multi-modal transportation, what do the vague terms "somewhat," "gradually," and "substantially" actually mean? Furthermore, why do half the scenarios use quantitative terms but not timing terms, while the other half use just the opposite? Shouldn't all scenarios use – and define – both?

I'm Naomi Kovacs, Executive Director of CPA, finishing our Land Use Committee's remarks for this evening. To continue where Paul left off, we have the following further questions:

9. Where the term "gradually" is used, how closely will the timing of increased support for multi-modal transportation parallel the timing of the projected residential and commercial growth?
10. What assumptions were used to project the respective percentages of affordable housing (35%, 30%, 20%, and 40%) under the various scenarios?
11. What assumptions about the number of current commuters moving back into the city are used to justify the estimated reduction of Vehicle Miles Traveled from the "historic rate"? In particular, did the consultant consider the following two questions when estimating the traffic impacts of the various scenarios?

First: If many commuters move back into the city, how many local car trips will be generated by them and by their families (now living elsewhere), and how much *new* commuting will be generated by the demand for new *workers* (such as teachers, nurses, and service workers) created as a result of the increase in number of new residents? And:

Second: In case of multiple earners, will there be some "reverse commuting" by members of households with continued employment elsewhere?

12. Will the differential treatment of height limits and MODA size under the various scenarios not skew the modeling results given that height limits are likely to be identical for each scenario after Measure B is voted up or down and the size of the MODA (if any) will be the same for each scenario once City Council makes its pertinent decision?
13. Won't there be unintended consequences for the radical reduction of onsite parking standards in Plan Santa Barbara (and especially in the Increased Housing Alternative) in the following areas?:
 - An adverse impact on handicapped persons, and what appears to be the violation of federal ADA law in at least one of the scenarios (the Increased Housing Alternative) if not more;
 - An adverse impact on businesses and tourism;
 - An adverse impact on the salability of new residential and commercial units which have either reduced or no parking provided for residents and/or guests; and...
 - An adverse impact on traffic (since drivers will likely have to circle blocks and slow down in search of available curbside parking).

We appreciate this opportunity to ask these questions and your consideration of them. We further appreciate the chance to elaborate on our comments in a written submission in the next day or so.

Thank you.

HANDOUT GIVEN AT HEARING:

Some Questions by Citizens Planning Association's South County Land Use Committee
About the Plan Santa Barbara Travel Model Results (October 22, 2009)

- (A) Why is the summary given in terms of LOS grades instead of the underlying quantitative terms of Volume to Capacity ratios, which are much more precise? (Using the more precise measurements would have been especially important within grade C because the city's environmentally relevant target for signalized intersections is 0.77 or better.)
- (B) Will the occasional discrepancies between the LOS grades cited for existing conditions in the modeling project and earlier studies be explained and justified? (We will offer examples in our written submission.)
- (C) Is the frame of reference provided by intersection levels of service subtle enough to model actual traffic conditions in transit corridors through commercial areas where frequent curb cuts and bus stops result in stop-and-go traffic and mid-block congestion?
- (D) What assumptions are used about the timely availability of sufficient funds to "expand pedestrian and bike paths" and to "support local and regional transit" under the various scenarios?
- (E) What assumptions are used to project the respective percentages of affordable housing (35%, 30%, 20%, and 40%) under the various scenarios?
- (F) What assumptions about the number of current commuters moving back into the city are used to justify the estimated reduction of Vehicle Miles Traveled from the "historic rate"?
- (G) If many commuters move back into the city, how many local car trips will be generated by them and by their families (now living elsewhere)?
- (H) How much new commuting is anticipated by newly employed teachers, nurses, and other workers serving the needs of new residents?
- (I) In case of multiple earners, how much "reverse commuting" is anticipated by members of households with continued employment elsewhere?
- (J) Won't the differential treatment of height limits and MODA size under the various scenarios skew the modeling results comparing different scenarios?
- (K) Won't there be unintended consequences of the radical reduction in onsite parking standards both in Plan Santa Barbara and especially in the Increased Housing Alternative for the following reasons?:
 - 2. Adverse impact on handicapped persons;
 - 3. Adverse impact on businesses and tourism;
 - 4. Adverse impact on the salability of new residential and commercial units; and
 - 5. Adverse impact on traffic (drivers circling blocks in search of available curbside parking).

Plan Santa Barbara – Traffic Model Results
10/28/09 South County Land Use Committee letter to Planner

28 October 2009

Barbara Shelton, Project Planner
Community Development Dept.
City of Santa Barbara

Sent via email to: bshelton@santabarbaraca.gov

Re: Santa Barbara Travel Model Results and the Plan Santa Barbara EIR

Dear Barbara,

As you know, both the Comprehensive Planning Committee and the General Plan Update Committee of the Citizens Planning Association (CPA) submitted comments on the scoping of the Plan Santa Barbara EIR which is being prepared under your leadership. The present letter focuses on the proposed contribution of the Santa Barbara Travel Model Results to the Draft EIR (DEIR). It is submitted on behalf of our South County Land Use Committee as supplementary to CPA's previous comment letters respectively dated February 6 and 12, 2009.

The present letter amplifies and updates our committee's oral presentation at the October 22 work session of the Planning Commission (PC) and the Transportation and Circulation Committee (TCC). In addition to the 9-page Staff Report that was made available a few days before the work session, this letter chiefly addresses the 2-page document distributed at the work session, as well as the consultant's 68-page PowerPoint presentation at that meeting. The 72-page Staff Report prepared for the March 12, 2009, PC/TCC work session has also been considered.

Section A of this letter requests answers to a number of particular questions which, we believe, should be asked and/or answered in the DEIR. Section B in turn submits a set of more general considerations concerning the planned use of the Travel Model Results in the DEIR.

A. Some questions to be asked and/or answered in the EIR

(L) The consultant's 2-page summary of the existing and future levels of peak hour service grades and volume-to-capacity ratios (LOS and V/C) at 52 intersections prompts at least two questions:

6. What justifies the huge variations among the figures cited for certain intersections (notably for #1 and #2) and the implausible advantages some such figures claim for Alternative 2 over the three other forecasts?
7. What justifies the occasional discrepancy between the Model's figures for "existing conditions" and the corresponding figures cited in previous studies (notably the Upper State Street Area Traffic, Circulation, and Parking Study) for #45, 46, and 47 (see paragraph 2 in note 3 of our letter dated February 6, 2009)?

- (M) Can the modeling properly assess the No Project Alternative given that it “does not reflect results of City development review process, which focuses on mitigation of significant impacts and rejection of applications which have unmitigated traffic impacts at study intersections”? (October 22, 2009, PowerPoint presentation, p. 60 of 68.) If it can’t and if, therefore, the intersection LOS grades and V/C ratios cited for the No Project Alternative yield an unrealistically bleak picture, don’t the improvements claimed for Plan Santa Barbara and especially for Alternative 2 require especially stringent cost/benefit analyses of the adverse environmental, financial, and quality-of-life implications of the associated policy changes?
- (N) Is the frame of reference provided by intersection levels of service subtle enough to capture actual traffic conditions in transit corridors through commercial areas where frequent curb cuts and bus stops result in frequent “friction” (i.e., stop-and-go traffic and mid-block congestion)? Is it not likely that the increased friction and the increased air pollution caused by heavy stop-and-go city traffic will diminish the value of any gains registered for Alternative 2 by the consultant’s intersection-based approach concentrating on *average midweek AM and PM peak hours* and ignoring *midday mid-block traffic*, which is especially heavy in commercial areas on the 52 *Fridays* and 30 or so additional *peak shopping days* of the year?
- (a) What assumptions were used regarding the availability of sufficient funds to “expand pedestrian and bike paths” and to “support local and regional transit” under the various scenarios? In particular, what assumptions were used regarding MTD’s financial capacity and plans to enhance its services?
- (b) With regard to multimodal transportation, what do the vague terms “somewhat,” “gradually,” and “substantially” actually mean in Section 12 of Attachment A of the Staff Report for October 22, p.5 of 9? Also, why are two of the four scenarios characterized in quantitative terms while the other two are characterized by the timing term “gradually”? Shouldn’t the policies applicable to each scenario be characterized by the use of *both* quantitative and timing terms? Furthermore, how closely can the timing of increased support for multi-modal transportation be expected to parallel the timing of the projected residential and commercial growth?
- (c) What assumptions were used to project the respective percentages of affordable housing (35%, 30%, 20%, and 40%) under the various scenarios? (See Section 7 of the same Attachment A, p.4 of 9.) We have not found any justification for those decisively important figures in the pertinent documents and urge that a detailed justification be provided to decision makers and the public, preferably before the DEIR becomes available in February 2010.
- (d) What assumptions about the number of current commuters moving back into the city were used to justify the estimated reduction of Vehicle Miles Traveled from the “historic rate”? In particular, did the consultant consider the following questions when estimating the traffic impacts of the various scenarios:
- (a) If many commuters move back into the city, how many local car trips will be generated by them and by their families (now living elsewhere), and how much new commuting into the city will be generated by the demand for new workers such as teachers, nurses, firefighters, police officers, plumbers, and other service workers -- a demand created as a result of the increase in the number of new residents?

(b) In case of households with multiple earners, will there be considerable “reverse commuting” by family members with continued employment elsewhere? Some reverse commuting could of course be accommodated at and near several freeway entrance and exit points which tend to be especially congested by traffic in the opposite direction. But didn’t the modeling project underestimate the full impact of newly generated reverse commuting on mid-block congestion in city streets? Also, will the EIR address that impact in terms of its effect on air quality and quality of life in our area?

(a) Concerning Sections 6 and 8 of Appendix A, pp. 4-5 of 9: Will the differential treatment of height limits and MODA size under the various scenarios not skew the modeling results given that height limits will be identical for each scenario after Measure B is adopted or rejected by the voters and the size of the MODA (if any) will be the same for each scenario once City Council makes its pertinent decision?

(b) Concerning sections 9 and 10 of Appendix A, p. 5 of 9: Were the following consequences of the radical reduction of onsite parking standards by Plan Santa Barbara and especially by Alternative 2 properly considered?

- Adverse impacts on handicapped persons, in apparent violation of federal ADA law in at least one of the scenarios (Alternative 2);
- Adverse impacts on businesses and tourism;
- Adverse impacts on the salability of new residential and commercial units which have either reduced or no parking provided for residents, visitors, customers, and employees; and
- Adverse impacts on traffic as drivers slow down and circle blocks to find curbside parking.

These and possibly other impacts would be particularly severe in those segments of the MODA which lie outside the downtown parking district and offer no alternatives (other than limited curbside parking) to residents, visitors, customers, and employees whose needs will not be met by the proposed onsite parking standards for new residential and commercial developments. We request, therefore, that an affirmative answer to the following question be seriously considered:

Shouldn’t land (i.e., extra open space) be set aside so that it can be made available for parking if Alternative 2 is adopted yet the proposed parking standards lead to unacceptable results?

B. Some general comments concerning the planned use of the Santa Barbara Travel Model Results in the Plan Santa Barbara EIR

In the previous section of this letter, we queried some details of the Travel Model Results. We now turn to four general concerns about the limited usefulness of the Model’s scope and approach in the Santa Barbara context.

1. The consultant defines the “model area” as encompassing “the City of Santa Barbara and portions of neighboring unincorporated County areas which are in or near the City’s Sphere of Influence” (p.10 of 72 of the Staff report for March 12, 2009). As illustrated by a map (Figure 1 on p.14 of

72), this definition excludes Goleta, Carpinteria, UCSB, and Isla Vista, each of which is served by MTD and closely interacts with Santa Barbara through work-related commuting and through commercial, medical, governmental, recreational, and entertainment travel. As a result of that exclusion, we cannot help but question the capacity of the model to offer reliably differentiated forecasts of local versus regional travel demand for the next 20 years.

2. The consultant’s map, as reproduced in the October 22 PowerPoint presentation, p.15 and p.52 of 68, divides the model area into four subareas to which the Daily Vehicle Trip Generation Rates are geared as follows (Table 5 on p. 53 of 68, somewhat simplified below):

| | <u>Area Type 1</u> | <u>Area Type 2</u> | <u>Area Type 3</u> | <u>Area Type 4</u> |
|---------------------------------|--------------------|--------------------|--------------------|--------------------|
| Single-Family (SF) | 8.05 | 10.56 | 11.98 | 11.98 |
| Multi-Family Zero Cars (MF_0) | 3.03 | 3.55 | 4.02 | 4.02 |
| Multi-Family One Car (MF_1) | 4.23 | 5.39 | 6.18 | 6.18 |
| Multi-Family Two Cars (MF_2) | 5.96 | 7.04 | 8.08 | 8.08 |
| Multi-Family Three or More Cars | 7.60 | 8.89 | 10.24 | 10.24 |

Table 5 registers some differences in trip generation between Area Type 1 (the downtown core) and Area Type 2 (a larger segment of downtown surrounding the core) for both single- and multi-family units. By contrast, residents of Area Type 3 (including Montecito, the Riviera, and the Mesa) and residents of the much more diverse Area 4 (including, for instance, both Hope Ranch and the Uptown Business District) are attributed the same level of daily trip generation. This is remarkable in view of the many existing, approved, and contemplated high-density residential and mixed-use developments in and around Upper State Street. Especially since this highly developed sub-area is slated to become part of the MODA, any conclusions based on the modeling of the pertinent “travel analysis zones” (TAZ) may have to be revised. Moreover, since the vehicle trips associated with households owning “zero cars” must be mostly trips by visitors, deliveries, and service calls, the trips associated with multi-family residential developments owning one or two cars per household seem to allow very few *additional* trips per day to be initiated by all members of each such household. This prediction seems to be very unrealistic.

- (a) The consultant examined eight “gateways” (Table 2 on p.15 of 72 of the Staff Report for March 12, 2009) as a means to “capture the traffic entering, exiting, or passing through the model area” (p.13 of 72). It is very unclear, however, how the generated data can be used for predicting commuter traffic in 2030 under the various scenarios of residential and nonresidential growth. After all, job-related commuting into and out of the city is only one reason for entering and exiting the model area. Other reasons, surely significant both for present conditions and future estimates under the four growth scenarios, include family visits, shopping, medical appointments, entertainment, recreation, legal or governmental business, tourism, etc. Furthermore, the airport and the Goleta and Santa Barbara train stations seem to have been ignored as “gateways” into the model area. Yet existing or new train stations, as well as (one hopes) several light rail stations, may well make more significant contributions to reducing car travel in 2030 than they presently do.
- (b) Alternative 2 presupposes a one-sided change in the Variable Density Ordinance, namely, the permitting of an *average* density of 50 dwelling units per acre in the MODA without balancing the steep increase with a comparable density decrease outside the MODA (see Staff Report, Sections 3 and 4 on p.4 of 9). Yet it is highly doubtful whether such a change is politically viable or, in terms of water and other resources, environmentally sustainable. Therefore, the modeling results for

Alternative 2 should be modified or should at least be supplemented by a variant with more balanced density predictions.

We appreciate the opportunity to comment, once again, on the travel demand modeling project and look forward to receiving responses to our questions and concerns.

Sincerely,

Naomi Kovacs
Executive Director

CC: Rob Dayton, Principal Transportation Planner
SB City Planning Commission
SB City Council
SB City Transportation & Circulation Committee

PH;nk,(jo)

Plan Santa Barbara – Land Use and Growth Management Element
11/16/09 General Plan Update Committee letter to Planning Commission

16 November 2009

Chair Larson & Commissioners
Planning Commission
Santa Barbara, CA 93101

Sent via email to: PCSecretary@SantaBarbaraCA.gov

RE: Plan Santa Barbara – Land Use and Growth Management Element
(November 19th Planning Commission Worksession)

Dear Chair Larson & Commissioners,

The General Plan Update Committee of the Citizens Planning Association welcomes several recommendations of the Staff Report prepared for the November 19th work session. In particular, we appreciate the proposed revamping of the Variable Density Ordinance according to reasonably restricted unit sizes, the reaffirmed importance of the Adaptive Management Program in continuously monitoring resource availability for both commercial and residential growth, and the exclusion from the proposed Mobility Oriented Development Area (MODA) of three subareas of the city which are of special historical significance (major parts of El Pueblo Viejo, as well as the Bungalow and Brinkerhoff districts). We also support the proposed protection of industrial and light manufacturing areas shown on the General Plan map, which would preserve their current M-1 and C-M zoning.

Along with our supportive points above, we wish to register five major concerns:

(O) Previous Plan Santa Barbara discussions envisioned a balancing of density increases in the MODA with decreased density in other areas of the city. We are puzzled by the absence in the Staff Report of any reference to such balancing. After all, current zoning for the city and for its sphere of influence could easily accommodate the 3,200 new dwelling units projected in Plan Santa Barbara for the next 20 years; it could even accommodate the 4,800 dwelling units projected in Alternative 2, the “Increased Housing Alternative.”¹ We urge, therefore, that the greatly increased residential growth potential of the Draft Land Use Element be estimated and that the draft be modified if an unreasonably high number results from such an estimate. Furthermore, we urge that the Adaptive Management Program annually monitor whether the number of total new dwelling units approved to be built is roughly 5 percent of the 20-year projections evaluated in the certified Plan Santa Barbara Environmental Impact Report.

Similarly frequent monitoring would be highly desirable concerning the number of proposed affordable units and the square footage of approved nonresidential growth. We assume that all such

¹ Figures cited from the Staff Report for the October 22, 2009, joint meeting of the Planning Commission and the Transportation and Circulation Committee, Attachment A, p.1. We note that current zoning, according to some estimates, could permit more than 10,000 additional dwelling units in the city and its sphere of influence.

numbers are routinely available on city data bases, but it is essential to have them published annually for review by decision makers and the public.

- (P) A set of more specific concerns relate to the potentially harmful implications of establishing “Special Mixed-Use Districts” with a base residential density of up to 48 dwelling units per acre. With the proposed 40% inclusionary requirement, the average density of projects in these districts would range from 56 to 67 dwelling unit per acre.² We note that these figures “do not reflect the state-mandated 25% Bonus density program for very-low and low-income projects,” and that “additional densities may be allowed [...] for Single Room Occupancy projects under 400 square feet.”³

Furthermore, currently applicable mixed-use incentives permit a site’s retention or redevelopment of its existing commercial square footage, plus minor additions under Measure E, independent of the size of the proposed new residential development. The resulting intensity of such mixed-use developments would result in unprecedented demands on the city’s natural, infrastructural, and financial resources – demands that probably cannot be met.⁴ We therefore oppose the establishment of this category of land use for any part of Santa Barbara.

- (Q) To a lesser extent, similar environmental concerns arise from the proposed introduction of the land use designation of “High Density” in the “urban core of the MODA” (i.e., downtown and the Milpas and State Street corridors). The base densities for this category are proposed to range from 30 to 38 dwelling units per acre.⁵ But given the additional inclusionary and other mandated or permitted densities mentioned in the previous paragraph, the actual average residential density in this large area of the city could easily surpass 46 dwelling units per acre – a roughly 100% increase over the average density currently permitted under the Variable Density Ordinance.

Furthermore, the outdated mixed-use incentives also mentioned in the previous paragraph would permit the retention or redevelopment of all commercial square footage existing on the sites in question. We believe that the city should remain mindful of its resource limitations (a goal clearly stated in the subtitle of Plan Santa Barbara: “Living Within Our Resources”) and recommend, therefore, that the proposed base density in the affected area be reduced by approximately 20% so that the density permitted by the revised variable density standards does not become twice as high as the density permitted by the current standards.⁶

At the same time, we wish to express our support for the proposed raising of this category’s inclusionary requirement from 15% to 30% and trust that an even greater percentage of new ownership and rental housing can be made affordable to local workers by employers and by public and nonprofit agencies.

² Staff Report, “Land Use Designations” p. 7.

³ Ibid, p. 6.

⁴ A selective list of already strained resources includes: water supply, wastewater treatment, road capacity, public transit, public safety (police and fire protection), scenic views, and schools (there is no public elementary school in or near downtown). As for air quality, see the last paragraph of the present comment letter.

⁵ Ibid, p. 7.

⁶ As recent discussions at Plan Santa Barbara work sessions revealed, even current zoning standards need not preclude reasonable profits for commercial developers interested in producing modestly sized units that are “affordable by design.”

- (R) For a number of reasons, a 20% reduction in the proposed base density figures seems to us particularly meaningful, if not indeed necessary, along Upper State Street. For example, the recently adopted Upper State Street Area Design Guidelines reaffirmed the environment-friendly front setback and height limit requirements of the SD-2 ordinance; several blocks of State Street between Las Positas Road and La Cumbre Road already lack sufficient space for off-street parking; and numerous parcels in the area are zoned C-P (Restricted Commercial) permitting only 12 dwelling units per acre. We submit that the proposed rezoning of the C-P parcels to C-2 (General Commercial)⁷ is likely to be controversial and, in any case, would exceed the scope of the present updating of the Land Use Element. The merits and demerits of such rezoning would need to be argued separately before the affected parcels can be deemed eligible for the High Density Residential designation which potentially entails up to 49 (or even more) dwelling units per acre.
- (S) Last but not least, the potential health gains due to working, shopping, and/or living in walkable urban centers must not be compromised by greatly increased health risks to the respiratory system of “sensitive receptors” including children. In proposing increased residential density near heavily traveled streets and along transit corridors, the Land Use Element should take into account 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."⁸ 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), NOx, and carbon monoxide, compared to people who lived near a less busy street."⁹ The most recent scientific study addressing the disparate health impacts of densification expressly contrasts “neighborhood walkability and air pollution exposure.”¹⁰ We urge that the Land Use Element prescribe generously landscaped setbacks and other open spaces to help reduce and dissipate air pollution in the vicinity of new commercial and residential developments.¹¹

We thank you in advance for considering our input.

Sincerely,

Naomi Kovacs
Executive Director

CC: Santa Barbara City Council

PH:gpuc,nk

⁷ See Staff Report for November 19, 2009, p.10.

⁸ 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, p. 8.

⁹ Howard Frumkin, Lawrence Frank, and Richard Jackson, *Urban Sprawl and Public Health* (Island Press, 2004), pp. 76-77.

¹⁰ Julian D. Marshall, Michael Brauer, and Lawrence D. Frank, “Healthy Neighborhoods: Walkability and Air Pollution” *Environmental Health Perspectives*, VOLUME 117 | NUMBER 11 (November 2009: 1752-1759), p.1752.

¹¹ 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”).

Plan Santa Barbara – Land Use and Growth Management Element

11/19/09 General Plan Update Committee (LUC) & South County Land Use Committee (GPUC)
statement to Planning Commission

Statement made by Paul Hernadi (CPA Board & LUC member)

& Naomi Kovacs (CPA Exec. Director) & Mary Louise Days (CPA Board & GPUC Chair)

Good afternoon, Chair Larson and Planning Commissioners:

I am **Paul Hernadi**, one of three speakers for the Citizens Planning Association's General Plan Update Committee summarizing our letter submitted to you on Monday. In the letter we registered our agreement with several major points made by staff in the Draft Land Use Plan and the Draft Land Use Map. Today we ask that you consider some of our committee's major concerns about those two documents. I will address the first set of concerns and two of my colleagues will address two others.

Previous Plan Santa Barbara discussions envisioned a balancing of density increases in the MODA with decreased density in other areas of the city. We are puzzled by the absence in the Staff Report of any reference to such balancing. After all, current zoning for the city and for its sphere of influence could easily accommodate the 3,200 new dwelling units projected in the Plan Santa Barbara environmental scoping documents for the next twenty years; it could even accommodate the 4,800 dwelling units projected in Alternative 2, the "Increased Housing Alternative." We also note that recent work session discussions revealed that even current zoning standards need not preclude reasonable profits for commercial developers interested in producing modestly sized units that are "affordable by design."

We discern a disturbing inconsistency and grave risk of environmental damage should the Land Use Element's approach to density significantly diverge from the degree of growth being evaluated in the Plan Santa Barbara Environmental Impact Report. We urge, therefore, that the greatly increased residential growth potential of the Draft Land Use Element be estimated and that the draft be modified if an unreasonably high number results from such an estimate. Furthermore, we urge that the Adaptive Management Program be charged to monitor **annually** whether the number of total new dwelling units approved to be built is roughly 5 percent of the twenty-year projections addressed in the EIR.

I am **Mary Louise Days**, the second speaker summarizing concerns more fully expressed in the four-page letter to you from CPA's General Plan Update Committee.

As you may recall, our committee is very worried about the potentially harmful implications of establishing "Special Mixed-Use Districts" with a base residential density of up to 48 dwelling units per acre. With the proposed 40% inclusionary requirement, the average density of projects in these districts would range between 56 and 67 dwelling unit per acre. Furthermore, the outdated but still applicable mixed-use incentives would permit a site's retention or redevelopment of its existing commercial square footage independent of the size of any proposed new residential development. We submit that the resulting intensity of development in the "Special Mixed-Use Districts" is likely to present demands on the city's natural, infrastructural, and financial resources which cannot be met. We therefore strongly oppose the establishment of this category of land use for any part of Santa Barbara.

To a lesser extent, similar environmental concerns arise from the “High Density” land use designation in much of downtown and near the Milpas and State Street transit corridors. The base densities for this land use category are proposed to range from 30 to 38 dwelling units per acre. But given the additional inclusionary and other mandated or permitted densities mentioned in the Staff Report, the actual average residential density in this large area of the city could easily surpass 46 dwelling units per acre - a roughly 100% increase over the average density currently permitted under the Variable Density Ordinance. We believe that the city should remain mindful of its resource limitations and recommend, therefore, that the proposed base density in the affected area be reduced by approximately 20% so that the density permitted by the revised variable density standards doesn’t become twice as high as the density permitted by the current standards. At the same time, we wish to express our support for the proposed raising of this category’s inclusionary requirement from 15% to 30% and trust that an even greater percentage of new ownership and rental housing can be made affordable to local workers by employers and by public and nonprofit agencies.

I am **Naomi Kovacs**, the third and last speaker for CPA’s General Plan Update Committee.

We strongly believe that the potential health gains due to working, shopping, and/or living in walkable urban centers must not be compromised by greatly increased health risks to the respiratory system of “sensitive receptors” including children.

In proposing increased residential density near heavily traveled streets and along transit corridors, the Land Use Element should take into account 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." 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."

The most recent relevant study, published just last week in the peer-reviewed journal *Environmental Health Perspectives*, expressly notes that urban densification tends to increase both walkability and air pollution exposure." We (therefore) urge that the Land Use Element prescribe generously landscaped setbacks and other open spaces to help reduce and dissipate air pollution in the vicinity of new commercial and residential developments.

In my remaining time, I’d like to add a two further points on behalf of CPA’s South County Land Use Committee, which has also been providing input into the Plan Santa Barbara process, alongside our General Plan Update Committee.

First, we worry about the apparent lack of documented commitment of funds by MTD, SBCAG and the Public Works Dept which specifically identifies the money needed to fund the MODA’s "expanded and improved alternative transportation."

And second, we appreciated hearing that Rob Dayton reported at this week’s Allied meeting that our previously submitted and stated questions were forwarded to the transportation modeling consultant, and we’re wondering when we might expect to hear staff’s responses to our numerous questions.

On behalf of CPA’s General Plan Update Committee and South County Land Use Committee, I thank you for your consideration of this input.

Plan Santa Barbara

12/07/09 General Plan Update Committee (GPUC) letter
& 12/10/09 statement to Planning Commission
Statement presented by Mary Louise Days (CPA Board & GPUC Chair)

7 December 2009

Chair Larson & Commissioners
City Planning Commission
Santa Barbara, California 93101

Sent via email to: PCSecretary@SantaBarbaraCA.gov

RE: **Plan Santa Barbara – Continued Work Session**
 (December 10th Planning Commission Work Session)

Dear Chair Larson & Commissioners,

The General Plan Update Committee of the Citizens Planning Association appreciates the opportunity to comment on the December 3, 2009, staff report for the subject work session, and we plan to be represented at the session on December 10. Rather than repeat comments made in earlier letters from our committee, we refer you to our correspondence of December 12, 2008, July 20, 2009, and November 16, 2009, among others.

We found the communications from four of the Planning Commissioners included in the staff report to be interesting and we support many of their points and observations. We do not disagree with the need to preserve the community's scenic beauty, historic character and architectural controls, diversity, and cultural advantages. As is pointed out by one Planning Commissioner, land use and development decisions must conform to the General Plan, under State law. It is not simply another document to be filed away.

Three questions that we wish to raise while considering these communications are:

- 1) Why does increasing density limits make Santa Barbara more sustainable?
- 2) What specific evidence do staff and consultants provide to indicate that our present path is unsustainable?
- 3) Can they identify the bases for their assumptions and the components that need to be fixed?

The MODA high-density categories on the proposed draft General Plan Land Use Map appear to be potentially destructive to the existing character of parts of the city, and we cannot support them. If Floor Area Ratio standards are recommended, they should not replace density standards but should be used to control building bulk.

Our committee agrees that neighborhood voices should be heard. While the current Plan Santa Barbara process has incorporated some community workshops, unfortunately, the process has not had a citizens committee similar to that of the 1961-1963 General Plan development and some of its subsequent amendments.

We thank you for considering these comments.

Sincerely,

Naomi Kovacs
Executive Director

Paradiso del Mare

10/31/09 Comprehensive Planning Committee letter to Planner

October 31, 2009

Mr. Allen Bell
Santa Barbara Planning and Development
123 E. Anapamu St.
Santa Barbara, CA 93101

Re: Paradiso del Mare DEIR

Dear Mr. Bell:

The Comprehensive Planning Committee of Citizens Planning Association has reviewed the Draft Environmental Impact Report (September 2009) and has prepared some comments on section 3.13 – “Recreation”.

There is a trend – first seen in the proposed Santa Barbara Ranch Project at Naples – to propose (a) a lateral trail system that is substantially away from the oceanfront and instead adjacent to either the railroad or the 101 Freeway, and (b) a vertical beach access point that would involve creation of a visually obtrusive very expensive structure that would lead from the blufftop to the beach below. That proposal is being replicated here at Paradiso del Mare.

We start by listing the desiderata of a public trail.

- A. Public access to the lateral trail should be well-spaced with respect to other entry points along the Gaviota Coast. (Coastal Act Section #30212.5)
- B. The California Coastal Trail should be located close to the bluff edge (California Coastal Conservancy 2003).
- C. At grade crossings of the Railway should be avoided.
- D. The vertical access points should be sited so as to require as little construction, maintenance, and visual impact as possible.

The California Coastal Commission’s (hereafter CCC) revised conditions for the ’93 Arco Dos Pueblos Golf Links Project included (among other provisions):

- A. A lateral access trail from Eagle Canyon to the western property line
- B. Public parking on the northeastern end
- C. Vertical coastal access at Eagle Canyon and a “small drainage west of Tomate Canyon”
- D. Dedication of lateral access along the beach

As the DEIR notes, the proposed lateral easement in the central and western segments of this project are “adjacent to the railroad and far from the bluff edge”. And “Shifting the central segment of the trail closer to the bluff edge to follow an existing dirt road would be more consistent with State guidance”. The cursory discussion of this option refers to “narrow and relatively deep drainage(s)”,

but the implications of this are not developed. Something more factual than the abbreviated notes (3.13-27) should be included (e.g., analyses by biologists, geologists, trail construction experts).

In the same way the option of vertical access at the small drainage west of Tomate Canyon has been inadequately reviewed. We believe this is an alternative that, once it is fully studied, might well become the preferred alternative in terms of providing vertical access. Certainly the cost of building an access stairway to descend 10 feet to the beach would be very much less than the million dollar plus estimate for the applicant's proposed access structure. Given that no funding is planned, it becomes very important to be realistic in what is approved so as to avoid fixing on an elaborate structure with at best dim prospects for ever being built.

And while the situation with respect to the Santa Barbara Ranch project is currently very confused due to the applicant's recent decision to withdraw from the MOU with the County, provision of vertical access at the small drainage west of Tomate Canyon could well serve both projects. Assuming that public parking will be provided at SBR, that would provide relatively easy access for surfers to the Naples Surf Break.

Consequently, we endorse the CCC conditions 1 – 4 (reproduced on 3.13-17 of the DEIR) enumerated for the earlier Arco project and ask that this alternative be adequately studied in the final EIR. And we recommend that the lateral trail be aligned reasonably close to the bluff (more or less along the existing dirt road in the central part of this project and continuing similarly on the western part of the project across Tomate Canyon). We further endorse protections of the harbor seal haul-out area (e.g., the possible closure 300 yards east and west of the haul-out area area during the breeding/pupping season.) Additionally we recommend that the applicant provide funding for the construction of the lateral and vertical access trails: providing easements without any identified funding source defaults to closure of the historic public access across this property.

Finally, we recommend that the lateral easement be an "ambulatory" one: that is, it adjusts automatically in the event of bluff erosion.

Sincerely yours,

Kalon Kelley, PhD
CPA Comprehensive Planning Committee

Goleta General Plan – Track 3 Amendments

11/03/09 South County Land Use Committee (LUC) statement to City Council

Statement presented by Greg Mohr (LUC member) & Lee Moldaver (CPA Board & LUC Member)

LUC meeting 11/2/09 **Motion** (Moldaver/Mohr/unanimous): CPA/LUC should offer testimony to remind Council of the General Plan’s original vision, to make 3 or 4 positive recommendations as to how the Plan could be improved, and to ask that the meeting be continued to November 17th.

Greg Mohr & Lee Moldaver did not prepare written remarks, but used our LUC discussion/motion to guide the comments they made.

Goleta General Plan – Track 3 Amendments

11/17/09 South County Land Use Committee (LUC) letter & statement to City Council
Statement presented by Barbara Massey (LUC Member)

17 November 2009

Mayor Aceves & Councilmembers
City of Goleta, CA

Sent via email to: *Roger Aceves <raceves@cityofgoleta.org>*
 Michael Bennett <mbennett@cityofgoleta.org>
 Margaret Connell <mconnell@cityofgoleta.org>
 Ed Easton <eeaston@cityofgoleta.org>
 Eric Onnen <eonnen@cityofgoleta.org>

RE: Goleta General Plan - Track 3 Amendments

Dear Mayor Aceves & Councilmembers,

The Citizens Planning Association's South County Land Use Committee appreciates this opportunity to comment on proposed General Plan Amendments 2.2 and beyond.

To start, the Environmental Defense Center provided your Council with exceptional advice in their detailed and comprehensive letter discussing the environmental and legal implications of the proposed General Plan Amendments before you. We urge you to follow their sound advice, keeping in mind that without doing so, you are leaving the matter open to litigation.

In addition to praising EDC's letter, we would like to make six specific comments this evening for your consideration:

First, it is important that Streamside Protection Area policy CE 2.2 calling for 100-foot buffers be restored to the *original* General Plan language. The recently revised and approved CE 2.2 which reduces buffer to 50 feet, and the Planning Commission version that further reduces buffers to 25 feet, should both be rejected.

Second, it concerns us that developed and undeveloped parcels may be granted different development standards. If a non-conforming structure that encroaches into the 100-foot creekside buffer were destroyed in a natural disaster, we understand that it could be rebuilt if the *same footprint* were to be used, but if any other remodel, re-build, or new construction were to be proposed for any parcel, whether developed or undeveloped, the applicants should be held to the same uniform standards and therefore include 100-foot buffers.

Third, Public Works projects should *not* be allowed in Streamside Protection Areas because they could cause significant impacts to creek habitat and are inconsistent with Coastal Act section 30240, as explained in EDC's letter.

Forth, protection of wetlands both in and outside of the coastal zone is critically important. Therefore, policies CE 3.4 & 3.5 should remain as originally adopted. These policies are for environmental

protection; the type and size of development should not be considered in decisions on wetland buffers. No jurisdictions in the County have policies that allow wetland buffers to be less than 100 feet.

Fifth, the City's current Storm Water Management Plan is inadequate, which is *why* policy CE 10.3 was originally crafted to follow other agencies' superior and proven storm water management plans. Therefore, we urge you to retain the original subsection g of policy CE 10.3.

And lastly, the weakening of environmental protection in many proposed policy revisions significantly increases biological impacts in the City. We are concerned that both the SEIR and General Plan findings are inadequate and do not include impact mitigation. Please keep in mind that under CEQA, alternatives that lessen impacts must be considered, though they have yet to be in this case.

Thank you for your consideration of this important input.

Sincerely,

Naomi Kovacs
Executive Director

BM;nk