



Citizens Planning Association

**COMMENT LETTERS & STATEMENTS**

**April 28, 2010 to May 27, 2010**

This document includes:

- a. **Plan Santa Barbara DEIR** (City of Santa Barbara)  
5/14/10 letter & appendix to Planning Commission (GPUC)
- b. **CPA Support for 10% Appeal Fee Increase** (City of Santa Barbara)  
5/27/10 letter to Santa Barbara City Council

**Legend:**

*LUC = So. County Land Use Committee*  
*LALUC = Lompoc Area Land Use Committee*  
*CP = Comp Planning Committee*  
*GPUC = General Plan Update Committee*  
*CPA = Citizens Planning Association*

**Plan Santa Barbara DEIR**

5/14/10 General Plan Update Committee letter and appendix to SB City Planning Commission

FROM: Citizens Planning Association's General Plan Update Committee  
TO: John Ledbetter, Barbara Shelton, Rob Dayton, Bettie Weiss  
CC: Planning Commission and City Council  
RE: Plan Santa Barbara Draft Environmental Impact Report (DEIR)  
DATE: May 14, 2010

The present comment letter aims at helping to ensure that Santa Barbara remain true to its historic heritage as an attractive, socially diverse, economically thriving, and culturally vibrant city without exceeding the limits of its natural and infrastructural resources.

**[A] THE DRAFT EIR (DEIR) COMPARES APPLES AND ORANGES AND NEEDS TO BE SUPPLEMENTED BY THE ANALYSIS OF A HYBRID SCENARIO**

The DEIR compares the Project to three alternatives in a way that makes an evenhanded evaluation of the four scenarios very hard if not, indeed, impossible. To mention only the two most obvious factors leading to essentially lopsided comparisons:

- (A) The "Project" and "No Project" scenarios are based on the assumption of at least twice as much nonresidential development (2 million and 2.3 million square feet, respectively) as the "Lower Growth" and "Additional Housing" scenarios (1 million square feet).
- (B) The robust and potentially very consequential Travel Demand Management proposals are only considered with respect to the "Additional Housing" alternative.

Combined, these two factors have resulted in misleading comparisons among the scenarios. For example, Table ES-2 on p. 26 of the DEIR Summary unfairly characterizes the Additional Housing Alternative, which benefits from both factors just mentioned, as having "substantially less impact" in several issue areas than the other two alternatives to Plan Santa Barbara.

In oral statements made at various hearings, both staff and decision makers repeatedly said that the DEIR tends to compare apples and oranges and that it may be desirable for Planning Commission and City Council to explore a "hybrid" combination of different features chosen from the various scenarios. We agree and urge that the Final EIR

- 2. state that the analyzed scenarios do not yield fair comparisons,
  - (a) evaluate a "hybrid" reflecting the most likely outcome of the community's multi-year discussions, and
  - (b) formally compare the chosen hybrid with the original "Project."

We believe that developing such a hybrid may even be necessary if the EIR is to include the reasonable range of alternatives required by CEQA; see especially Guideline 15126.6(a). Developing a well-

designed hybrid could also yield an alternative that is environmentally superior to the Project and to all other alternatives considered so far while feasibly attaining the main project objectives.

Judging from the May 6th Planning Commission deliberations, the following combination of major features may emerge as a good candidate for such evaluation: most policy preferences of Plan Santa Barbara adjusted to the nonresidential development limit of 1 million square feet and supplemented by the majority of the analyzed robust Travel Demand Management measures. We prefer such a hybrid to any of the four scenarios analyzed in the DEIR but submit that it, too, may end up falling short of achieving the CEQA ideal of meeting all major project objectives with the minimal possible environmental impact. With a view to steering Plan Santa Barbara toward such a goal, we offer the following comments on the DEIR's discussions of impacts in four issue areas: jobs/housing balance, visual and historic resources, transportation, and traffic-related air pollution.

## [B] THE DEIR UNDERESTIMATES SERIOUS IMPACTS IN AT LEAST FOUR ISSUE AREAS

We urge that the drafting of a hybrid scenario take the comments offered in this section of our letter into account.

B-1. As for the city's jobs/housing imbalance, we note that the controversial "High Density" areas proposed by Plan Santa Barbara would only reserve 15 or, at most, 25 percent of the new dwelling units for people who are economically eligible for subsidized housing but may not be, let alone remain, employed within city limits. Since the proposed up-zoning of dozens of city blocks to "High Density" areas would mostly yield market rate housing, the Final EIR (FEIR) should state that such blanket up-zoning is more likely to worsen than improve the city's jobs/housing balance. By contrast, a policy preference for the occasional approval of exceptionally high density overlay zones, to be applied only to 100% affordable condo or rental developments, could significantly improve that balance. Another promising approach that should be explored and explicitly analyzed in the FEIR is employer-supported housing, including subsidized housing for the the city's critical work force (e.g., firefighters and police officers). Some remarks made by Assistant City Attorney Scott Vincent at the April 29th Planning Commission meeting seemed to indicate that it would be legally feasible for an entity he called "Santa Barbara Incorporated" to give such preferential treatment to certain groups of its employees.

B-2. As for the protection of visual and historic resources, we are puzzled by the DEIR's insufficient attention to the scenic views and established architectural character of El Pueblo Viejo. Major residential and nonresidential developments in this area might benefit a few dozen property owners and developers, and they might also provide affordable dwelling units for a few dozen lucky winners eligible to participate in lotteries arranged by the Housing Authority. But the proposed overdevelopment of the EPV would make our city less attractive to residents, commuters, and visitors alike. Especially the Additional Housing scenario, which projects the "construction of 60 to 80 new multiple-story buildings within the MODA with many of these located within El Pueblo Viejo" (p.13-35), would imperil the sustainability of tourism as a major, if not indeed the most important, element in the city's economic vitality. For additional comments on DEIR Sections 10 (Heritage Resources) and 13 (Open Space and Visual Resources), see the attached Appendix.

B-3. As for transportation, we note that the DEIR confusingly wavers between addressing two very different problems: the number of job-related commutes to the city and the number of job-related commutes to the South Coast (including Goleta and Carpinteria) as a whole. This wavering, and the

uncertain specificity and reliability of various quoted figures, is particularly manifested in Table 16.1, Figure 16.1, and the following two sentences quoted below from Section 16, p.3 (emphases added):

“In total, it appears that there are up to 32,000 commuter trips to the South Coast on a daily basis via automobile [...]. Of this South Coast total, there are approximately 15,000 commuter trips to the City from the north, and 17,000 commuter trips to the City from the south.”

The above sentences do not make it clear whether they refer to commuters to the South Coast or to the City and whether the numbers quoted include car trips sharing rides. Besides, both the City and SBCAG have listed quite different commuting figures on other occasions.

We also note that the DEIR unduly focuses on the PM rush hour of the most congested intersections. This approach leads to undesirable neglect of any increased congestion that would be experienced by residents, commuters, and visitors alike at all hours and at all intersections, as well as between intersections. One example of this neglect is the lack of quantifiable attention to mid-block travel time in commercial corridors with bus stops and multiple curb cuts between intersections. Especially in an arterial like Upper State Street, it would be important to quantify mid-block friction and that friction's potential for intensifying stress, road rage, the temptation to phone and text, and the blocking of emergency vehicles. Yet, despite repeated community complaints, the pertinent maps do not even indicate the high Roadway Average Daily Traffic Volumes for Upper State Street between La Cumbre and Las Positas Roads (see Figures 16.2 and 16.5 in DEIR Vol 1,, Section 16, pp. 9 and 39).

Furthermore, congestion is expected to increase under all four scenarios even at the most congested intersections. Therefore, the FEIR should consider that the Additional Housing Alternative's rosy picture of minimal rush hour traffic increase (DEIR Vol 1, Section 16, pp. 64-66) may well prove to be illusory. For this to happen, all it takes is that some of the most aggressive measures of the proposed Travel Demand Management should run into insurmountable financial or political obstacles and/or that the residential trip-generation forecasts of the Travel Demand Model Overview's Table 5 (DEIR Volume 2, Appendix I-3, p. 20 of the digital version) should fail to materialize. For this reason, the EIR must evaluate the likelihood that these programs will be effective mitigation, and if necessary develop additional mitigation measures. Additionally, prudence and due diligence demand that the FEIR take a more realistic comprehensive look than the DEIR did at congestion and its most serious consequence -- traffic generated air pollution -- to which we now turn.

B-4. As for traffic-related air pollution, we regret that the DEIR's lopsided approach to public health results in inadequate treatment of air quality. The DEIR shows laudable interest in fighting the nation-wide epidemics of obesity and diabetes through the encouragement of walking and biking to work and school, but it shows no comparably great interest in fighting the nation-wide epidemics of asthma and other respiratory diseases linked to living near freeways and busy arterials. This is especially deplorable because walking or biking to work or school in Santa Barbara is particularly problematic for “sensitive receptors” (children, seniors, and respiratory patients) during inversion effects and other adverse meteorological conditions, as well as on several days or even weeks after soot-generating wild fires.

To be sure, the most pertinent scientific study exploring interactions between neighborhood walkability and air pollution exposure was published less than a year before the completion of the DEIR. (See Julian D. Marshall, Michael Brauer, and Lawrence D. Frank, “Healthy Neighborhoods: Walkability and Air Pollution,” *Environmental Health Perspectives* 117:1752–1759 [Online 20 July

2009]) Yet the potentially serious health impacts of outdoor exercise have long been known. (See, for instance, Christopher C. Daigle et al, "Ultrafine Particle Deposition in Humans during Rest and Exercise," *Inhalation Toxicology* (2003), 15:539-552, and J.E.Sharman et al, "Cardiovascular Implications of Exposure to Traffic Air Pollution during Exercise," *Q J Med* (2004) 97:637-643.) Furthermore, the disparate impacts of urban densification on regional versus local air quality are known to scientists and should have been fully acknowledged in the DEIR. As stated in 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):

"On a regional scale, less driving would lead to less pollution, an improvement that would be especially marked for regional-scale pollutants such as ozone. But on a very localized scale -- alongside a street in a particular neighborhood -- greater traffic density could increase exposure to pollutants, especially locally scaled pollutants such as particulate matter and air toxics." (p.77)

The same book also suggests the need to be very cautious about locating residential developments near such traffic arterials as Carillo Street and Upper State Street with current (and increasing) traffic volumes of about 30,000 Average Daly Trips:

"Investigators in several countries carefully measured pollutant levels alongside streets and in homes to determine the exposures associated with traffic. One study, in Amsterdam, 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. [...] A more detailed study, also in Amsterdam, compared homes in busy main streets with homes with lightly traveled side streets, measuring both outdoor air and indoor air. Levels of both PM ([particulate matter] and VPCs [volatile organic compounds] were higher near the busy streets both outside homes as indoors" (p.76).

These and other studies (referred to in endnotes 8 through 15 on p. 234) indicate that a threshold of 10,000 vehicles per day may be necessary to capture the effects of pollutant levels on residents living near Santa Barbara arterials. We believe that the FEIR should recommend measuring outdoor and indoor pollutant levels near heavy traffic before the city adopts policies favoring residential densification in Santa Barbara's urban core and along traffic arterials. At the very least, policy recommendations for increasing residential density in the city's commercial areas ought to identify environment-friendly mitigating measures such as ample and generously landscaped setbacks (rather than energy-wasting requirements for mechanical air circulation and temperature control).

Instead of generally requiring strict and enforceable city standards for setbacks and landscaping, the DEIR even fails to heed the explicit guidance offered by the California Air Resources Board and endorsed by the Santa Barbara County Air Pollution Control District, according to which new residential developments should not be sited within 500 feet of freeways. We note that the attempted justification (see DEIR Volume 2: Appendix E, pp. 57-61 of the digital version) for disregarding state and county guidance is based on unknowable long-term results of prescribed statewide efforts and ignores at least two major relevant factors affecting air quality in the city blocks in question: the railroad tracks for diesel-powered trains run parallel to Highway 101 and the partially toxic pollution generated by ocean shipping along the California coast may or may not be enforceably regulated by international agreements in the foreseeable future. The overall result of the DEIR's approach to traffic-generated air pollution is a severe understatement of the potential impacts on the health of Santa

Barbara residents caused by locating residential development in close proximity to Highway 101 and other arterials carrying over 10,000 vehicles per day.

We thank staff, consultants, Planning Commission, and City Council in advance for considering our input.

Attachment: FURTHER COMMENTS REGARDING SECTIONS 10 (HERITAGE RESOURCES) AND 13 (OPEN SPACE AND VISUAL RESOURCES)2010-05-17 letter re DEIR.pages

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**APPENDIX TO CPA GPUC COMMENT LETTER OF MAY 14, 2010: FURTHER COMMENTS ON SECTIONS 10 AND 13 OF THE PLAN SANTA BARBARA PROGRAM DRAFT EIR**

**COMMENTS REGARDING SECTION 10 (HERITAGE RESOURCES) IN PLAN SANTA BARBARA PROGRAM DRAFT EIR**

By Mary Louise Days and the Citizens Planning Assn. Committee on the City General Plan Update

Page 10-1 The “Issues” paragraph could include a policy recommendation for continued designation and preservation of historic resources.

The photograph caption should be re-worded to state that the Presidio was founded in 1782, not constructed then, and that it marked the beginning of the Spanish “settlement” of Santa Barbara, not “occupation.” The same photo and caption appear on page 17 of the March 2010 Draft EIR Summary. There was no Santa Barbara to occupy in 1782, and the native village near West Beach was not “occupied.”

Page 10-5 First paragraph contains errors. Father Serra did not establish Mission Santa Barbara in 1782, but he did accompany de Neve and Ortega during the founding of the Presidio in that year. The Mission was founded in late 1786. Its location might better be given as Laguna and E. Los Olivos Streets. Mission Canyon Road begins across the Mission Creek bridge. East Los Olivos Street intersects with Alameda Padre Serra. During colonial times there were also adobes on East de la Guerra Street. The last sentence in the paragraph should be removed, as there was no Chumash village established at the Presidio.

Second paragraph, fifth sentence, beginning “Spanish political influence..” the words “and early American” should be inserted after “pre-American.”

Third paragraph, first sentence, insert “from the south” after “in 1887.” Also, it should be noted that many brick and wood-framed buildings were constructed during the 1870s, not solely after 1886.

Figure 10.1 In the table “Prominent Historic Structures” No. 1 is not located on E. De la Guerra Street. The addresses of the Presidio are on E. Canon Perdido Street. Its construction date is 1782 et seq or

1788 et seq. No. 6, El Paseo, also has an address on E. De la Guerra Street. Its construction dates are 1922-24 and 1928-29. No. 8, the County Courthouse, construction was completed in 1929.

Page 10-7 The caption for the Arlington Theater photograph should say “first greeted guests in 1931.”

Second paragraph, the Hoffmanns did not found the Community Arts Association; they joined it. The Plans and Planting Committee of the association was led by Mr. Hoffmann, and Miss Chase was secretary, at the time described.

Third paragraph, it would be more accurate to say at the end of the second sentence “and they were semi-successful.” The correct name of the 1960 City committee was “Advisory Landmark Committee.” The Arlington Theatre should not be included in the list of buildings in the same sentence. The end of the last sentence should be changed from “...protect historic resources” to “...protect the site of the Royal Presidio.” Prior to that date El Cuartel had been a state historic monument.

Page 10-8 First full paragraph, third sentence, the reference to demolition projects should be deleted when in the same sentence as the words Historic Landmarks. In the same sentence insert “and Brinkerhoff Avenue Landmark District” before “to ensure...”

Page 10-9 First full paragraph, second line, insert “and survey forms” after “well as maps.”

Bottom paragraph, footnote 3, we are of the opinion that the Riviera Campus Historic District is not adjacent to the City’s core, and that the number “Four” at the beginning of the second sentence should be changed to “Three.”

Page 10-10 Table 10.4. The architectural styles listed for the Brinkerhoff Avenue Landmark District should be re-written to be more accurate. We suggest delete “Victorian-era” and name example styles from the Municipal Code, as was done for the other districts.

Second paragraph, first line describing El Pueblo Viejo, delete “and Downtown Core.” The original EPV encompassed sixteen blocks, but did not include or cross State Street. Third line, the district also includes the Museum of Natural History. Sixth line, delete reference to Santa Barbara Junior and Senior High Schools, as they are not located in EPV. The last sentence mentions a Historic Maritime Tradition within EPV, but Stearns Wharf and the Breakwater are not within EPV boundaries.

Third paragraph, second sentence, we suggest that the word “All” be inserted in front of “these guidelines...”

Page 10-11 First paragraph, second line, insert “College” after “Santa Barbara.” This was the school’s correct name in 1944. Third line, delete “commercial” and insert “school and office” before “development.” The campus did not possess a commercial land use zone classification; it received a residential classification with a research and development overlay zone.

Third paragraph, second line, we suggest insert “Anglo-American” before “physician” for Dr. Brinkerhoff. The as-is sentence ignores any colonial-period physicians who may have lived here.

Page 10-13 Second paragraph, delete “homes” after “2,795” and replace with “dwelling units.” This section 10.3.1 *Project Components* was written before some of the *Plan Santa Barbara* policies were amended, and many of the projected effects of extensive growth are “not known.” It does refer to “40 to 50 new three- to four-story buildings” within the MODA. There is no mention of a separate Historic Resources Element to assist in protection of historically significant and archaeologically important sites.

Page 10-14 Section 10.3.2, Important Heritage Resources, the last sentence refers to area maps used in the citywide *Plan Santa Barbara* analysis; however, an important State-owned resource located in downtown is not correctly identified on the plan’s maps. This is El Presidio de Santa Barbara State Historic Park, which is not specifically mentioned in this chapter of the DEIR.

Section 10.3.3, second paragraph, the reference to a Historic Resources and Community Design (CH) Element is now obsolete, because citizens’ groups and Planning Commissioners requested a separate Historic Resources Element. This comment also applies to page 17 of the March 2010 DEIR Summary.

Page 10-16 Adverse impacts to archaeological resources are possible in the downtown historic core near the Presidio and in the Mission Santa Barbara/Museum of Natural History area, as well as the waterfront area mentioned in this section 10.4. Recently approved projects have resulted in potential impacts that existing policies did not prevent.

Page 10-17 Impacts that are “less than significant” to archaeological resources will only occur if restrictions are tightened for so-called “in-fill projects” and if existing policies and procedures are followed religiously, including needed staff training.

Page 10-18 First paragraph, a potential for new development within the small Brinkerhoff Avenue Landmark District is mentioned. A special land use zone classification or an overlay zone should be considered for the Brinkerhoff district and its immediate environs. The DEIR could recommend this, as well as for parts of El Pueblo Viejo, especially as the impact offered for this section is “*less than significant with mitigation.*”

Second paragraph contains very good wording about the potential effects of additional development on historic districts.

Final paragraph is probably obsolete, as it does not mention a proposed Historic Resources Element.

Page 10-19 The third and fourth paragraphs refer to proposed density increases within the MODA, as well as 40 or 50 large buildings, but still the impacts are called out as “*less than significant with mitigation.*” This would necessitate very strict adherence to controls and to mitigation measures in Sections 10 and 13.

Sixth paragraph, it should be carefully noted that the DEIR states “...incremental alteration of the historic character of El Pueblo Viejo and other historic or landmark districts could contribute to cumulative changes in other downtowns along the South Coast undergoing modest

redevelopment...where potential exists for demolition or alteration of historic structures.” This potential impact is then dismissed.

Page 10-21 Final paragraph sets forth the potential for increased danger to heritage resources under the Additional Housing Alternative. However, the DEIR goes on to assert on page 10-22 that “resource impacts would be potentially significant, but could be mitigated to less than significant levels...” with numerous mitigation measures. This seems to be a reach, as the description refers to “60 to 80 new multiple-story buildings within the MODA with some of these located within El Pueblo Viejo.”

Page 10-23 Section 10.8 Mitigation Measures should include a proposal for a Historic Resources Element, plus wording calling for participation by the Historic Landmarks Commission in the recommended policy regarding “Construction Adjacent to Historic Structures.”

### COMMENTS REGARDING SECTION 13 (OPEN SPACE AND VISUAL RESOURCES) IN PLAN SANTA BARBARA PROGRAM DRAFT EIR

By Mary Louise Days and the Citizens Planning Assn. Committee on the City General Plan Update

Page 13-1 The general statement makes very good points.

Page 13-2 Second paragraph, it would be helpful to state that the airport is within the City Limits.

“Figure 13-1 Visual Resources” map, El Presidio de Santa Barbara State Historic Park is not shown correctly, nor is it identified as a resource. It is located on both sides of E. Canon Perdido Street and along Santa Barbara Street. Mission Historical Park is shown as a part of Santa Barbara Mission, which it is not. The surname “Park” should be inserted after “Alice Keck.” There should be no apostrophe in “Stearns Wharf.”

Page 13-6, fourth paragraph, we suggest inserting “Pavilion and” between “Cabrillo” and “Bathhouse” as the more correct name of the historic structure.

“Figure 13.2 El Pueblo Viejo: Existing Building Height Limits and Tall Buildings”

Why is No. 21 the Canary Hotel shown as 4 stories in height? It clearly has 5 stories to match the older hotel that was demolished. The same comments are made regarding the map’s omission of the Presidio State Historic Park and Mrs. Park’s name.

Page 13-7 Fifth paragraph, first line, the name of the block-square garden is Alice Keck Park Memorial Garden. Her married surname was Park.

Photograph caption, is this really the intersection of Chapala and Haley Streets?

Page 13-8 First paragraph, eighth line, suggest insert “historic” before “building types.”

Second paragraph, fifth line, it is misleading to say El Pueblo Viejo district is “centered” on State Street, as it only goes one and a half blocks west of State. It is more accurate to say that EPV is centered on El Presidio de Santa Barbara State Historic Park, if a center description is desired.

Fifth paragraph, first line, insert “Park” after “Alice Keck.”

Sixth paragraph, fourth line, delete “Landmark” and replace with “Notable.” The library and the shopping mall are not designated Landmarks.

Page 13-11, first paragraph, tenth line, delete “Theater” and insert “Building (eight stories)” as being more accurate for the Granada Building.

Page 13-12, first paragraph needs re-writing because much of the information about buildings, their heights and dates is not correct.

Page 13-13 “Table 13.2: Taller Buildings in El Pueblo Viejo” We have several corrections to suggest and questions to ask regarding this table. Please contact the undersigned for more information.

Page 13-14, portions of the first paragraph do not appear to accurately describe the Milpas Street corridor.

Second paragraph, fifth line, the street passes next to Cabrillo Ball Park, not Dwight Murphy Field.

Page 13-15, third paragraph, sixth line, insert “Park” after “Alice Keck.”

Sixth paragraph, there is no Northside neighborhood listed in the March 2010 draft general plan document.

Page 13-16, first paragraph, fifth line, we suggest delete “within the City” as Earl Warren Showgrounds is not located within the City Limits.

Page 13-17, bottom paragraph, second line, refers to the plan’s proposed policies as projecting an additional 2.0 million square feet of non-residential development, but a decision on acceptance of that figure has not been made.

Page 13-23, second paragraph, third line, suggest inserting “, Hilda Ray” after “Elings.” We do not necessarily agree with the assertion in the last sentence that an increase in the number of taller structures “would not substantially change or contrast with existing views.” Stronger language for protection of views is needed in the document.

Page 13-24, second and third paragraphs, we agree that potential development under the policies could have cumulative impacts on views.

Page 13-25 to 13-31, we would like to see more analysis of how all these potential adverse impacts can be rendered “less than significant” through existing and proposed policies. It is interesting that Paseo Nuevo, which was planned by the City as a regional shopping center, is referred to in the DEIR

as justifying or leading to the subsequent construction of “multiple four-story developments” along Chapala Street.

Page 13-27, third paragraph, sixth line, please explain how the Historic Landmarks Commission would have design review power in Outer State Street. Is this wording meant to refer to projects affecting historic buildings?

Page 13-28, second and seventh paragraphs, the same question that was asked for page 13-27.

Page 13-29, fourth full paragraph, the same question as above.

Page 13-30, second paragraph, the statement is made that new development in single-family neighborhoods “would not be expected to result in substantial changes” to their character. We believe that reductions in parking requirements and weakened zoning regulations, for example, could do just that.

Page 13-38, “Mitigation Measures” we suggest that the Presidio State Historic Park be included as a special type of active open space deserving of protection.

Page 13-39, “Scenic Views” and “Community Character” we make the same suggestion as above because the state park protects scenic views of and from Downtown and adds significantly to community character.

May 13, 2010

**Appeal Fee Increase**

5/27/10 CPA Board letter to SB City Council

FROM: Citizens Planning Association  
TO: Mayor Schneider and Santa Barbara City Council Members  
CC: City Administrator, Community Development Director, and City Planner  
RE: Proposed Appeal Fee Increase  
DATE: May 27, 2010

The Citizens Planning Association supports the recommendation by the City's Finance Committee to increase the fee for appeals to City Council by 10 percent from the current \$390. This increase is in line with other fee increases being contemplated due to the present budgetary crisis and is within reason. If a larger increase were implemented, it might make appeals to City Council prohibitively expensive for many people and organizations, thus depriving them of what is their right in the public process.

May 27, 2010