

Allied Neighborhoods Association

February 12, 2009

TO: Barbara Shelton, Environmental Analyst, Community Development Department,
City of Santa Barbara

FROM: Judy Orias, President

RE: Plan Santa Barbara Environmental Impact Report Scoping Comments

Setting

The EIR needs to give information about how cities in California, such as Santa Barbara, with a strong history of local general and community plans are different from such cities as Portland in such states as Oregon which lack a strong history of local planning. There should be a discussion of how adopting their strategies may not be appropriate or compatible with Santa Barbara and how Santa Barbara can adapt strategies that are unique to its characteristics given this contextual difference.

Policy Consistency

It is now unclear what existing policies will remain and what policies such as general plan and coastal plan policies, will be affected by the changes contained in the Policy Preferences document. The EIR needs to clearly spell out what these existing policies are that remain in effect and what is proposed to be changed. See discussion of policies on page 21. What existing policies are anticipated to be changed to foster “Environmental stewardship and sustainable development”?

On page 11, the Policy Preferences document talks about “The need to review the Charter Section 1507 growth management assumptions.” The EIR needs to be clear as to what this means and what the intention is. What is to be the effect of this “review” on existing policies?

Maintaining our historic and community character is listed as one of the policy drivers. The EIR needs to be explicit on what strategies are needed to maintain our character as well as which of the proposed policies threaten this and how will their impacts be mitigated.

This section must deal with the existing inconsistent policies of how to preserve Santa Barbara’s historic character as contained in the El Pueblo Viejo with the continued effort to put more dense housing in the downtown. These inconsistencies are being further exacerbated by many of the new proposed policies.

It has always been the policy of the city to live within its resources. Many of the proposed policies, such as higher density limits and the resultant increased water use have the potential to be inconsistent with our limited resources. This needs to be spelled out and discussed in the EIR along with possible strategies to expand our resources. Indirect impacts need to be clearly spelled

out.

The EIR needs to spell out how many of the proposed policies to increase density, such as MODA's and the incentives for secondary units in single family neighborhoods are inconsistent with the existing Zoning Ordinance.

Is the change to the Variable Density, and other policies consistent or inconsistent with the SD - 2?

Are policies such as the reduced parking requirement consistent or inconsistent with the Local Coastal Plan?

Variable Density is to be changed to have smaller units. How can the impacts be measured when we do not know the size and number of units this would accommodate?

Areas to be annexed

Will the resulting zoning be consistent with the county's zoning and if not how is this to be justified. Will areas such as Mission Canyon, where the taxes do not support the services be annexed? If so, how will this problem be dealt with?

Housing

While giving the impression that more affordable housing will be provided, many of the housing strategies for dense development may only provide housing without it being affordable. The EIR needs to clearly spell out how realistic it is for any of these strategies to provide any significant amount of housing for the different categories of HUD affordability and workforce, absent subsidies. The source of funds for these subsidies need to be identified.

Before more Secondary Units are to be encouraged, we have asked that each neighborhood be evaluated for the suitability of these additional units. Items such as potential water demand, sewer demand and suitability of lot sizes all need to be included for each neighborhood. In addition, what will be the impacts on the character of residential neighborhoods of additional traffic and parking. Neighborhoods need to be evaluated for access and egress capacities for not only day to day traffic, but for what will happen in case of emergencies. We are even more concerned about these items being included in the EIR, since it is our understanding that the Neighborhood studies may be further put off because of budget constraints.

Transportation

There is a heavy reliance on increased public transit, yet there is no identified funding source for this increase. Where the money will come from needs to be clearly spelled out. In order to meet people's needs the EIR should include modes of transit that are available as alternatives to fixed line public transit. It should be explored what strategies are possible. We know that the city transportation planner has said that car share serves are not willing to come to Santa Barbara.

The EIR needs to address the impacts of policy C8 which appears to foster the potential narrowing of 4 lane roads to 2. It needs to explore how this will affect efficiency of movement and resultant idling of cars as well as safety especially during emergency evacuation. We have been told that this policy applies to Cliff Drive. Since this is not the view of many Mesa residents and they believe that Cliff Drive needs to have 4 lanes in case of emergency, the EIR should make clear what their options are if Cliff is to be narrowed.

Economics

Many of the proposed policies and their mitigations will result in large additional costs to the city. The cost of each item and the potential revenue source for it needs to be clearly spelled out. It is unclear if the Economic Study will be done in time to provide the necessary information for the EIR. This would be a serious flaw to the adequacy of many of the proposed mitigation measures.

Adaptive Management

The Adaptive Management Program needs to be formulated and included in the EIR. Otherwise such questions as: How will any improvement of the jobs/housing imbalance be measured? How can the causes and effects be quantified? Cannot be adequately answered.

Mixed-Use

The EIR needs to address the potential incompatibility of mixed-use projects with commercial activities, such as delivery of goods, noise, hours of operation etc. impacting on residential use. Traditional Euclidean zoning was designed to prevent such impacts on the different uses.

One of the original ideas behind mixed-use was that the commercial component would use parking space in the day time and the residents would use the parking at night. The EIR needs to cover what happens with the parking when the business hours overlap with the residential ones. This is true especially if the commercial use is a popular restaurant open for dinner. The EIR should specify types of uses that should not be included in mixed-use projects.

Regional Planning

The Policy Preferences document discusses the need for “Santa Barbara to form strategic alliances with Ventura, Lompoc and Santa Maria to address and plan for mobility needs...” and policy LG14 talks about a regional land use plan with a provision for affordable housing. The EIR needs to spell out what is anticipated by these policies. These policies appear not to be adequate and ignore the fact that Santa Barbara’s daytime population greatly increases. The EIR needs to include the functional equivalent of a regional alternative and the impacts on city resources. It needs a realistic full discussion of a functioning South Coast region as well as the greater region including north Santa Barbara county and Ventura county. The EIR needs to address that as part of a region, many of our employees choose to live in other parts of the region and commute because Santa Barbara does not have the land to provide enough housing of the type and price many of our commuters need or desire. Other inducements for commuters include educational, medical and cultural resources.

Water Supply

The EIR needs to include all sources of potable and recycled water currently available to Santa Barbara. This should not include desal as this is a very expensive project with high energy use that is not currently on-line and has no identifiable funding source. The EIR needs to include the need for and source of a 10% drought buffer. The latter is even more significant because the state is in a long term drought. We know that delivery of our share of state water is extremely uncertain. How will the drought affect our other sources of water?

If the desal plant is to come online, will the city sell excess water to other potential users such as UCSB? If so, these need to be identified.

Growth Inducement

We know there is a shortage of affordable housing for local workers. However, with the Redevelopment Agency no longer able to produce any and the private sector unable to build it without subsidies, we do not see how the city can fill this need. The EIR needs to answer this question.

It is clear that inclusionary zoning, which is the current primary source of workforce housing cannot improve the jobs/ housing balance. The luxury units that are necessary to subsidize this program generate the need for even more employees who will then need housing or have to live out of the area. The pros and cons of this program need to be studied in the EIR.

What strategies are available to insure that housing will go to local workers and not to others from outside the area? The same question applies to those buying luxury units. How many condos have become rentals? How can the city legally restrict who will live in a given unit?

Many first responders have not shown an interest in living in downtown condos, how will this problem be dealt with?

Recreation

Many of the areas that are identified for higher density lack open and park space. Mitigation strategies need to be identified, such as creating new pocket parks where needed.

Land Use

LG 5 This policy talks about transfer of development rights from high fire areas to MODA's. The city has provisions for the Transfer of Existing Development Rights in the Housing Element and in the Municipal Code (Chapter 28.95) but has always said that it is too difficult to make this work for residential developments. The EIR should discuss what has changed and why the city thinks it might work now. In addition, moving this density to the MODA's will increase impacts in those areas. These impacts and their proposed mitigations need to be spelled out.

Transfer of Development Rights from other areas, such as the Gaviota Coast, has also been

discussed. Since the city paid into the county study is the city planning to use the county ordinance as a model? How will the impacts of this be mitigated?

Summary

Without more specificity, we question how many of the impacts of proposed new policies can be adequately addressed in the EIR. Without knowing how much and where the increased density will be placed how can the impacts be measured? For mitigations that will require large financial outlays the source of funding must be addressed with specificity or these mitigation are not adequate.

We look forward to seeing our concerns addressed in the Draft EIR.