

Allied Neighborhoods Association

April 26, 2010

Comments to the Planning Commission for April 28 Hearing

RE: Plan Santa Barbara Draft General Plan Update and Draft Environmental Impact Report (DEIR)

Members of the Allied Board have been reading and analyzing the General Plan Update documents and we have reached agreement on a number of “big picture” issues.

General Comments

Allied has observed that for a process touted as being “citizen driven” the GPU has been anything but that. While there was a great amount of citizen participation, the public input was manipulated within a very constricting and almost self-determining format.

The documents that have been produced are just the opposite of “user friendly.” If those of us who have had years of experience dealing with such documents are having difficulty, we can only imagine how un-decipherable they are for the general public.

EIR’s Failure to Assess Assumptions

Many of the proposals presented in the project description for assessment of environmental impacts were based upon assumptions. We and others questioned the validity of these assumptions. We were led to believe that the EIR would have a discussion of these assumptions and provide some basis that they will work as proposed. This discussion is completely missing and assumptions are treated as givens.

For example, massing of high densities in certain locations, such as downtown, would result in beneficial transportation choices and would take commuters off of the roads; would provide housing that is affordable to substantial numbers of the workforce within the city; and that the proposed housing policies and incentives would have a positive effect on the jobs-housing balance. We are concerned that if these assumptions are incorrect and the policies do not work as proposed, there is the potential for environmental impacts.

The EIR must contain an impact analysis of this potential worst case scenario. This is not too speculative to be addressed. The documents themselves provide ample evidence that the new units will be expensive to build and there is no policy to guarantee that they will be affordable to the target group. There is no guarantee that the residents of these units can be required to work downtown or that they will abandon their cars. Related documents clearly state that reductions of congestion will be the result of TDM and not land use policies. The EIR needs to clearly state the impacts of the land use policies if the TDM is not implemented.

Measure E

We agree that new Measure E limits should be adopted that would include a maximum of no more than 1,000,000 square feet of new commercial development over the next 20 years.

Residential Density

We support that the following:

- Residential would be limited to no more than 140 residential units per year with no carryover of any shortfall.
- Maximum residential density should be limited to an average of 20 units per acre. The High Density Standard should be eliminated from the GPU. We oppose increasing residential densities beyond the Medium High Density limit without exception.
- New units should be spread throughout the city, subject to strict compatibility standards in existing neighborhoods, including fitting within their resources and existing zoning.

Design Standards

We call for the GPU process to include development of new design standards for buildings in commercial zones including such items as setbacks, open space, and height limits. This should be conducted in a special open public process.

Additional Allied Recommendations

- All references to increased density contained in the proposed changes to the General Plan be removed. The rationale for this is to remove any ambiguity and preclude any references that decision makers in the future could use as a basis for changing the zoning ordinance during the life of the GPU.
- Change the Variable Density Ordinance to limit the size of units in new residential developments. The density should vary with unit size according to the Medium High Density which maintains the current average of 20 units per acre.
- Encourage employer sponsored housing as the “tool of choice” for development of workforce affordable housing.
- Make protection of the character of existing residential neighborhoods an equal priority with affordable housing in accord with Plan Santa Barbara’s goal directive #2.
- Clarification in the GPU that affordable housing is a regional issue and not a quest or crusade which places greater responsibility on our city than is reasonable to expect from one of the size and character of Santa Barbara.

Cathie McCammon, President