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RE: Plan Santa Barbara Draft Environmental Impact Report

Here are my comments on the DEIR:

A major problem this document has is that it is very difficult to follow. It is just not reader friendly. This is in part due to the lack of not having the same items in the Alternatives. They are just not comparable. The amount of non-residential square footage is not consistent in all of the Alternatives and only the Additional Housing Alternative includes the robust TDM Program. The latter leads to confusing and false conclusions. Are results due to having more housing or priced parking?

There is also a lack of specificity of terminology that can lead to different conclusions depending on the reader's background.

For example, throughout the document, starting with the first couple of pages, mention is made that affordable housing is a priority. There needs to be some clarification of what this means, i.e. affordable to whom. Is the priority for the HUD definition of affordable housing or workforce etc.? Footnotes throughout the document would help.

Clarification of the term "affordable housing" itself is needed. In reference to for-sale units is it talking about "price controlled housing" or units that are "affordable by design" or those that are the result of incentives? Is rental housing part of this and if so, are the rental units to be price controlled or is it assumed that rental housing is by its very nature affordable?

Another term that is bandied about is TDM. While there are many ways of managing transportation, does TDM only become "robust" when parking pricing is involved or what?

Too many such terms are used that could mean different things to different people or require the reader to have background information in order to understand what is really being meant.

The use of assumptions that are not analyzed or examined is a major problem. The impacts, if the assumptions do not work should be included in the document. For example, it is assumed that these new units somehow will be affordable to employees.

Yet we know that there are many existing low income jobs and that this is the type of job that will increase in the future. How is to be guaranteed that the new housing clustered in downtown will be affordable to those in these jobs? What is to prevent the new units from being too expensive given the cost of land and construction? For that matter, what is to prevent these units from being occupied by affluent retired people? If truly affordable housing is desired why are these units not located in the R-3 or R-4 zones where land is somewhat less expensive?

Just because these units are adjacent to transit corridors it is assumed the residents will use public transit. Why? Other studies that are not mentioned have shown that the use of public transit is the result of many conditions. Some studies have indicated that what is important is, will the public transit take people where they want to go in a timely fashion and that these factors are more critical than the point of origin of the trips.

Another assumption is that commuters want to live in downtown condominiums or apartments, when in reality what they really want a house with a yard that they can afford.

What will be the impacts, if the assumptions made in Plan Santa Barbara are wrong?

Page 8 Issues of Known Public Controversy.

Instead of just bullet points, the EIR should have more text describing what are the controversies. There should be references to other pages in the document where there may be more discussion of these items. Footnotes should be used to define such items as AB 32.

Page 9 should have a Table to show Alternatives and their Impacts.

Page 2-7 Variable Density:

Reference is made to a “prescribed set of ratios” It would be helpful to know what these are, so the reader can compare existing zoning and how many smaller units are being proposed.

Page 2-9 Transfer of Existing Development Rights:

This section needs to be clearer. It needs to include specifically what happens when square footage goes from a commercial sending site to a receiving site and how it can become residential. The interplay of TEDR and Mixed- use should be explained in the EIR.

Page 3-2 MODA:

Now that the city has determined that MODA is not a fixed area but a set of policies, needs to be clarified. Are these policies now implementation strategies to mitigate impacts?

Page 3-4. Mention is made to improving the jobs/housing balance through increased affordable housing relative to jobs. It would be helpful to have a table showing what jobs sectors we have and then what type of housing would be applicable or relative to those sectors. For example, service sector jobs are typically low paying, especially in the retail and tourism industry, so this would appear to limit the type of housing that is affordable to this sector such as rental housing or inexpensive condos. This table needs to include salary ranges and then how this translates into what is affordable to those ranges.

In addition, the conclusion that additional housing in the downtown would help the jobs/housing balance is made in some Alternatives. If the housing is not restricted or affordable to the workforce, how can this housing help the jobs/housing balance? What are the impacts, if this housing is bought by non-workers?

The information in the EIR regarding luxury or other expensive housing units generating the need for service workers is inadequate. It is assumed without any basis that there are already enough service workers to fit these needs.

Page 3-5 under “Housing” it is stated that there is no numerical cap proposed for the number of residential units. There should be a discussion about why there is an existing cap and how this is to be changed.

On page 3-18, the issue of numerical caps is also discussed and the document states that this is to be done away with in order to facilitate the provision of affordable housing. The EIR needs to discuss the impacts of not having any cap or limit. It appears that this is an attempt to do away with the previous down-zoning under the guise of the need for affordable housing. It also appears that the true goal of Plan Santa Barbara is to change our city into a high density city.

Since it is still not clear how there is any guarantee that the housing built will be affordable, what are the impacts of having development of mainly expensive housing? It would seem to make a difference in the type of impacts we have in relation to cost of housing, for example, occupants of expensive units would have more cars, drive more and have more impacts on services. Why is not a residential Measure E type program put forth as a mitigation?

Page 3-5 Under Types of Development it is stated that “Affordable housing for very low, low, moderate and middle income households would be allocated priority for limited resources...., however, then there is also mention of workforce, rental or transitional (not defined) housing. Just how are our limited resources to be allocated amongst these various housing categories? This needs to be spelled out. Without some mechanism for preserving our limited resources for the types of housing we really need, it would appear that the goals of the Plan Santa Barbara are not really being met. Of course there is also the problem that the categories of affordable housing stated seem to include housing for everyone not making over \$200,000.

Information needs to be provided as to existing resources and what happens when additional more expensive resources will be needed, such as more imported water and/or desal. At what point do resources such as water become unaffordable to very low, low income etc households?

Page 4-1 One of the suppositions in the document is that the increased densities in the MODA would be offset by reduction of density elsewhere, such as reduced variable density. There needs to be an explanation as to how this will work. For example, will allowing higher density in one place require contemporaneous down zoning elsewhere? If this is not done, will the increased density adjacent to the transit corridors just lead to higher overall density? What are the mitigations for the impacts of this policy?

Table 4-1 Increased residential growth is listed as having a positive effect on sustainability, yet it is not clear that this increased growth will even cut down on commuting. This is an assumption that the EIR needs to discuss. It is not clear how we are to avoid have both increased residential growth in the city and increased commuting. What then will be the impacts of this?

Table 4-3 There are problems with this table in regards to how the policies relate to sustainability. For example, CH10 and it's effect on sustainability are not logical. How do reduced and step-backed building heights produce an incentive for community benefit projects versus other projects? H-4 Unit Size and Density: Here again there is a disconnect. How would increased density reduce water demand?

Section 5. Description of Alternatives

Without MODA this entire section on Alternatives needs to be re-written. Since MODA is no longer a designation tied to a particular place of the map, how does this effect the impacts analysis?

Section 6. Air Quality

The EIR fails to address pollution that is generated on major arterials, such as State Street, especially Upper State Street, Carrillo and possibly Milpas. These streets experience heavy traffic at times in the afternoon that are earlier than peak hours. While I realize that anecdotal information is not enough, it is not pedestrian friendly to walk or eat next to these streets. Residents complain of feeling dirty as a result of walking and complain of headaches and other unpleasant respiratory responses. Since APCD does not test the air quality along these streets, the EIR should call for this testing. Further mitigations should include greater set-backs and greater landscaping along these streets. This is especially true where residential is proposed as part of mixed-use projects.

Another item that needs to be included in the EIR is the increase of traffic under the High Housing Alternative. This has the potential of increased traffic and congestion on local streets and thus increased air pollution.

The EIR fails to address the impact of air pollution on respiratory conditions as a result of air pollution along major arterials especially with stop and go traffic. Increased asthma

and other respiratory conditions are not given the full discussion they deserve even though health concerns are a part of Plan Santa Barbara.

Section 10. Historic Resources

It would be helpful to have a map showing the EPV, other historic districts and the specific historic or heritage sites. There should also be a map showing where high density development is proposed. And an additional map showing how they overlap.

Both existing policies and proposed mitigations are inadequate to adequately protect historic resources.

A proposed mitigation that should be added is: that no buildings taller than the historic site be allowed in same block square block. It is not enough to just deal with adjacent buildings.

Without such a mitigation, there is the potential that the Level of Impact should be considered a Class I Significant Impact.

There should be a recommendation that there be a separate Historic Element.

Section 16. Transportation

The TDM program of priced parking is stated to be the most effective means of reducing congestion because it affects everyone. How will this work without having the unintended consequence of hurting the downtown merchants and thus running counter to the goal of financial viability? Why should someone who is not within walking distance, go downtown to shop or eat when other areas offer free parking?

Since public transit use is listed as already high for the size of the city, why would it be assumed that even more people will want to use public transit? Also, why is it assumed that given the convenience of the auto for multiple stop trips and the time it saves for these trips, that just because people live along transit corridors, they will abandon their cars?

Without knowing how many of the commuters are actually going to the city and not other areas in the south coast it seems that some of the assumptions, policies and mitigations are questionable.

The analysis of the Alternatives seems to be skewed because the new TDM programs were only put in the Additional Housing Alternative.

If the TDM is traffic neutral, how can it be said on page 16-32 that there will a 45% or 15% reduction in commuter trips under the Additional Housing Alternative?

How does price parking changes relate to recent statements and assurances made by city staff that the free 75 minute parking will be retained?

An additional Mitigation that should be included in the EIR and could potentially reduce congestion for some impacted intersections is to not allow intensification of uses for projects that are located in Areas 3 and 4. . For example, do not allow Elings Park to become a Regional Park, do not allow Val Verde to significantly increase and do not allow Hillside House to become higher density. The traffic model shows that trips in these areas are more likely to be by car

Another mitigation that would make using alternative transit more available and potentially attractive to people would be the use of shuttles or other forms of non-fixed route transportation, to get people to the fixed transportation corridors.

If mitigations are required in order to offset the impacts of a project, these mitigations need to be in place prior to allowing the new development.

How will TDM prevent workers from parking in neighborhoods, if the neighborhoods have not entered into a program of restricted residential permits? If employees have to park there how will this reduce congestion? Will there not be additional congestion as people drive around more to find free parking?

Santa Barbara had quite a few non-profits and volunteers. Will not the priced parking be a disincentive to them? Not everyone goes downtown to work, shop or eat.

Section 19. Population and Jobs/Housing Balance

It is reasonably foreseeable that the increased density as proposed will not help the jobs/housing balance. As the DEIR points out the RDA will end shortly and there will not be money for affordable housing. Legally there is no way to restrict who buys or rents these units unless government money is involved. While private developers may do small workforce units, these may still not be affordable to many of the existing workers and the projected employees. Given the current reality, the DEIR should not say that the High Housing Alternative achieves the goal set forth of being the best alternative in regard to the jobs/housing balance. This is pure speculation.

It would appear that the best thing that could be done is to recognize that the Low Housing Alternative is environmentally superior. Land should be designated for the future development of affordable housing and restricted in such a way that it is still available at some future date for development by the RDA. Under future legislation there may well be new funding. It is counterproductive to allow this land to be developed now by the private sector by giving them incentives, when the goal of providing housing affordable to all segments of our workers is not met.

Page 19-8 The statement that “Historically, most large institutions such as UCSB and SBCC have not provided employee housing. “ is incorrect. UCSB has provided some limited amount of housing for new faculty members.

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