

Allied Neighborhoods Association

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City of Santa Barbara Planning Division
Attn: Peter Lawson, Associate Planner

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RE: Valle Verde Retirement Community Expansion

Allied Neighborhoods Association has reviewed the DEIR for this project and finds this document to be unsatisfactory. A number of issues raised in written correspondence during the scoping period for this DEIR have not been addressed. The DEIR fails to provide both decision-makers and the public with the information necessary to make an informed decision on this project. Without this information the document fails to comply with CEQA. Potentially significant impacts and necessary mitigations are missing.

This projected expansion will add 40 additional units, additional employees and commercial uses that have the potential to impact the health, welfare and safety of the existing residential area and its residents.

The document fails to provide an adequate description of the environmental setting making it impossible to show the true changes and impacts that will result from this expansion. Without this information it is mere impossible to take into account the environmental consequences.

Safety: The DEIR fails to address the baseline condition of lack of enforcement of existing speed limits in the area and the impact that additional traffic generated by this project on an area that is already characterized by the residents as unsafe. City policies encourage people to lead a healthy lifestyle yet no provision is being made to insure the safety for pedestrians and bike riders.

There is no mention of the impacts on the adjacent Hidden Valley Park which is used by the neighborhood.

This problem of unchecked speeding exists on all the residential streets providing access to the project: Tornio Drive, Palermo Drive and Calle de los Amigos. Residents of the valley, including seniors at the retirement homes and those with small children have expressed strong concerns for their safety.

Since this problem is not addressed, appropriate mitigations for these problems are not identified for this additional traffic.

Hazards: The location of the high pressure gas line is not addressed.

Parking: Employee parking is proposed, but there are no measures to insure that the employees will be required to use it and is it adequate for the additional employees generated by the new units and the

employees and users of the new commercial additions (bed and breakfast and bank) that are proposed.

The proposed project cites the addition of 83 parking spaces. However, judging from the amount of parking on adjacent residential streets it would appear that the existing retirement home does not have adequate parking for existing uses. A full analysis of the existing parking situation needs to be made in order to adequately describe the existing environmental setting. It is only then that the impacts of any increased demand and mitigation measures can be properly addressed.

The idea that a fully parked street is a benefit to traffic calming is ludicrous. The DEIR statements that a fully parked (both sides) of Calle de los Amigos is a safety factor fails to address the needs of the residents who walk, ride bikes, and the fire safety factor and in reality subjects them to additional threats to their safety and welfare. The EIR statement taken at its value suggests that all projects proposed for development not supply parking as it slows down traffic.

There are no firm numbers on the projected users of the commercial additions including the bed and breakfast and the bank branch. Will these be restricted to the residents of Valle Verde and their guests or will these be open to the public at large. Without the specifics of these additions, there is no way to know the number of employees and the additional traffic they will generate.

Evacuation in case of emergency:

In case of a fire such as the Painted Cave Fire, the plan for evacuation of the residents of Valle Verde should be contained in the DEIR.

This project cannot be viewed in isolation. This proposed expansion is adjacent to the high fire hazard area of Arroyo Burro Creek and the effect on the evacuation and safety of the residents in the area must be covered in the DEIR.

Proximity to highly impacted intersections: Hidden Valley is exactly what its name states, it is a valley with limited accessibility. The whole area is a part of the environmental setting. To ignore the built environment which includes the existence of two retirement homes along with highly built out neighborhoods of single family residential and condos, churches, Hillside House and the adjacent Elings Park, which all must daily deal with the limited accessibility in this entire area is misleading and impacts the health, welfare and safety of the residents and users of this area.

If the residents of the area must leave the area in case of an emergency they are immediately confronted with first going on Modoc Road and Calle de Los Amigos and then going to La Cumbre and 101, Los Positas and 101 or Los Positas and Cliff Drive in order to go north or south. Both Modoc and Los Positas function as 45 mph rural roadways without the benefit of very many stop signs or traffic lights. All of the intersections are already highly impacted and are only projected to get worse in the future.

The cumulative impacts of all of these factors must be taken into consideration, fully discussed in the DEIR.

Additional concerns we have are:

There is a lack of discussion about the timing of demolition and the staging of construction equipment, construction workers parking, and delivery and hauling routes.

Any discussion about the number of bed and breakfast units proposed and will these be available to the general public or just to relatives and friends of the residents. Will the bank office be just available to residents and how many employees will it have.

Will the CUP establish a cap on the number of units and/or the number of residents in the project.

The proposed grading and 8 foot high retaining walls are not identified as to their length this could affect possible soil movement as demonstrated on the Campanil Hills area.

There needs to be further discussion on:

The preservation of the oak woodland , specifically a discussion of the potential impact of buildings being constructed close to the deeded preservation areas.

There should be discussion and incorporation of the Valle Verde survey of their employees as to their impact on intersections. Currently the most frequently used intersections are at level D which is not acceptable city standards.

In conclusion:

The EIR is full of statements that have important decisions made sometime in the future by unidentified people with vague terms as to what should govern these decisions. The entire report should be rewritten with the identification of who makes the decisions and what guidelines and timetables they must follow needs to be specified.

In conclusion Allied finds that this EIR does not adequately address the impacts of the proposed project and should be rewritten and re-circulated once the important information is provided.

Cathie McCammon. President of Allied Neighborhoods Association