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21 April 2009

Mayor Blum & Council Members
Santa Barbara City Council
Santa Barbara, CA

Sent via email to: *Marty Blum* <mblum@santabarbaraca.gov>
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RE: El Encanto Hotel (1900 Lasuen Road)

Dear Mayor Blum and Council Members,

The Citizens Planning Association's (CPA) South County Land Use Committee has monitored and participated in the City's review of the proposed revisions to the 2004 Master Plan for the El Encanto Hotel. We have been uncomfortable with the way that the 2004 approval has been revised through a protracted series of piecemealed changes. This piecemealing has compromised the integrity of the land-use planning and permitting process and led to a series of progressive changes to the site that have clearly become cumulatively considerable. We question whether the proposed project is appropriate for the site, whether the City has adequately considered land-use incompatibilities with surrounding land uses, whether the historic resources have suffered "death by a thousand cuts" and whether the proposed changes, considered in conjunction with other piecemealed approvals over the past three years, will cause the visual and aesthetic character of this important site to be degraded or lost.

We believe the City should ensure these issues are fully evaluated and resolved through the preparation of an environmental impact report (EIR) on this project that examines both the immediate project impacts and the cumulative effects of the past piecemealing that has been allowed on this site.

The applicant proposes to use 10,000 square feet of TDR credits transferred from an industrial site on Yanonali Street to enlarge facilities on the El Encanto Hotel site. We join the concerns stated by members of the Planning Commission questioning whether it is appropriate to transfer development credits from an industrial area for purposes of significantly expanding development on a resort property that is required to ensure the least possible conflict with surrounding residential land uses.

We have further grave concerns over the proposal to transfer an additional 7,000 square feet of Measure E entitlements onto the site to further enable intensification of development on the site. Measure E and the City's enabling ordinance places limits on the size of expansions that may be allocated. Specifically, the applicant proposes to draw from two independent sources of Measure E credits for a total of 7,021 square feet of additional development, when the ordinance states the maximum combined square footage that can be obtained is 3,000 square feet.

While we recognize that the City has a strong interest in the resumption of this business that is an important source of revenue, we note that the owners of El Encanto Hotel have announced a decision to divert construction funding away from the project due to the financial downturn. While unfortunate, we believe that this hiatus provides an opportunity to enhance the City's land-use planning process and address the issues identified above.

We ask that your Council reject the applicant's proposal and give direction that the applicant should work in good faith with the neighbors, CPA and others interested in this important site to ensure that an appropriate site plan and project description can be achieved. At that point a suitable environmental review document can be prepared.

Short of that, Council should direct the preparation of an EIR addressing issues of historical resources, visual resources, and land use conflicts, with focus on the cumulative effects of the proposed project in conjunction with prior City approvals for revisions to the 2004 Master Plan on this site.

As proposed, CPA's South County Land Use Committee opposes the revised Master Plan for the reasons stated in the neighbors' appeal.

Thank you for your consideration.

Sincerely,



Naomi Kovacs
Executive Director

CC: Kathleen Kennedy, Associate Planner <kkennedy@santabarbaraca.gov>