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CITY OF SANTA BARBARA
PLANNING DIVISION
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CITY CLERK'S OFFICE
SANTA BARBARA CA

City of Santa Barbara Mayor, Council Members, and Planning Commissioners
June 13, 2010

Subject: Discussion of Approval of the Draft Plan Santa Barbara on 6-22-10

The League of Women Voters of Santa Barbara has worked closely with the City throughout our 71 year history, beginning with a campaign to eradicate rats during the 1940's! The League has always been involved in City planning, working on the original General Plan and all its subsequent updates. In 1988 League praised the amount of public outreach that had been involved in preparing it, and we can do that again today. League thanks the City and the staff for all the workshops, hearings and documents that they have provided to the public. This has kept the public involved for five years.

The League has long had a position urging the City to live within its resources. Our position was probably studied when the City wrote the section which contains the same language. Originally water was one of the main concerns, and it still is one of them, but now many other resources are becoming scarce and more expensive. We think that this Charter section should be the deciding factor in this Update, as it has been in the past. We still disagree with some features in the draft Plan, but we think after some changes have been made, approving it would be much preferable to continuing with our present policies. The Environmental Impact Report (EIR) has clearly shown that the No Project Alternative would have many more negative impacts.

Since 2005 it has been obvious that the pace of growth would be the key issue. It has always been so in Santa Barbara, for every generation. This is because our attractive City and coastal location create a worldwide market for expensive housing here. This makes it close to impossible for people who work here and make moderate salaries to find any place to live in the City. We all agree that is a major problem. With large subsidies from the Redevelopment Agency the City has been able to build excellent low income housing, but recently the market has failed to produce any serious amount of housing for the middle income worker. The result has been a serious jobs/ housing imbalance, and a common desire to try to change that.

League could support a hybrid version of Plan Santa Barbara that would address these housing issues without damaging the charm and character of this historic city. We thank you for creating a new element of the Plan to address our Historic Resources. The League sees Santa Barbara as unique and worthy of protection by the people who live here, as evidenced by the report of the 1998 Downtown-Waterfront Visioning Stakeholder's Committee, which was agreed upon by one hundred community leaders. That report and its vision are still relevant today. For that reason the League opposes the proposed

100 foot setbacks as entirely inadequate, and opposes any high density development around El Pueblo Viejo or other historic areas. We think that a 45 foot height limit is preferable downtown to protect the scenic views and limit traffic congestion.

Non-Residential Development

The League helped to pass Measure E, and thinks it has been very successful. We support limiting future non-residential development to 1 million square feet, even though we understand that much of that may have already been committed. With the arrival of mixed use, commercial development has been expanding too fast.

For-Sale Housing Units

Almost everyone is concerned about the development of more high end condos, and their effect on the jobs/housing imbalance. We can support a policy of requiring 25% inclusionary, instead of the present 15%, and requiring smaller units. However, we have concern that inclusionary may never produce enough affordability to be continued. We do not support any additional increase in density, or any bonus densities, and in fact further restrictions may be needed to prevent excessive market rate development.

Rental and Employer Based Units

Everyone also seems to agree that we desperately need more rental units. We understand that you want to incentivize their production. However, we strongly oppose any increase beyond the present 15-27 units per acre as a base density. With 15-27 units, we agree with the Planning Commission that a 50% density increase could be allowed. However, it will be absolutely essential to prepare covenants that permanently prohibit any conversion of such units to for-sale condominiums.

Public Services and Capital Improvements

The League is endorsing the figures used in the Low Growth Scenario because they will require so few expensive expansions of both public services like police, fire, water, open space and energy, and less need for major capital improvements. Permitting less growth when the City will have limited income will allow you to live within your financial resources during difficult economic times.

Adaptive Management Program

We support intensive use of Adaptive Management to control the pace of development and test the availability of key resources.

Traffic Demand Management (TDM)

Nationwide the League supports efforts to reduce greenhouse gases and to reverse climate change. If the City had really adequate transit, people would not need to live downtown in order to use it. Because we do not think that current plans for more density will produce condos that working people can afford, we do not support faster growth. We do support applying some TDM proposals to Plan Santa Barbara in a gradual manner, and only with the approval of the downtown merchants if they will be affected by them.

CONCLUSIONS:

The League of Women Voters has been pleased to be able to participate in the development of the draft Plan Santa Barbara because we know how important it is. We have seen that slow growth policies over a hundred years have preserved the City's charm and character, and we feel that they should be continued with the Lower Growth Alternative figures incorporated into Plan Santa Barbara. During the League's critique of the Environmental Impact Report we pointed out that the Lower Growth Alternative is clearly the Environmentally Superior Alternative, and we have asked that it be described as such in the final document.

With the several changes that we have mentioned, we think that League could support Plan Santa Barbara. We have noted that on April 22 the UCSB Economic Forecast told the City's businessmen that the reason that Santa Barbara County has suffered much less than most in the current recession is because of the slow growth policies that have restrained construction spending and job growth on the South Coast. They noted that if you put curbs on growth during a boom period, the City won't suffer as much when the bust arrives. And we want to add that all of us will have a much more pleasant quality of life in the meantime.

Connie Hannah

Connie Hannah, First Vice-President
for the Sustainable Communities Committee of the League of Women Voters

Tschech, Susan

From: Rodriguez, Julie on behalf of Community Development PC Secretary
Sent: Wednesday, June 16, 2010 4:38 PM
To: Bruce Bartlett; Deborah L. Schwartz; Jacobs, Charmaine; Jostes, John; Larson, Stella; Lodge, Sheila; Michael Jordon
Cc: Kato, Danny; Feliciano, Gabriela P.; Vincent, Scott; Tschech, Susan; Dayton, Rob; Gularte, Beatriz; Ledbetter, John; Nares, Adam; Shelton, Barbara; Unzueta, Irma; Weiss, Bettie
Subject: FW: Plan Santa Barbara

From: D.H. von Wittenburg [mailto:vonwitt1@cox.net]
Sent: Wednesday, June 16, 2010 2:52 PM
To: Community Development PC Secretary
Subject: Fw: Plan Santa Barbara

Dear Secretary:

This is written by an active resident of the Montecito Community because I am concerned about how Plan SB may make changes detrimental to the uniqueness and semi-rural character of our Montecito 'Village'.

Without consideration of our Montecito Community Plan there will undoubtedly be greater density on Coast Village Road resulting in more traffic impact and may require many cars to park by residences near Coast Village Road. Water usage would certainly be higher, compatibility with the semi-rural atmosphere might not be maintained, and our Water District would undoubtedly have less available water for Montecito residents.

We love our unique and historical area and I hope Plan Santa Barbara will be designed with input from our community and passed before it's too late to maintain what we have now as much as possible.

Thank you for your consideration,

Jean von Wittenburg

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To: City Council and Planning Commission
CC: John Ledbetter, Bettie Weiss
From: Citizens Planning Association
Date: June 19, 2010
Re: Plan Santa Barbara

Three Citizens Planning Association (CPA) committees have submitted numerous documents (including an 18-page brochure) concerning Plan Santa Barbara. While these documents were developed by our General Plan Update Committee, Comprehensive Planning Committee, and South County Land Use Committee, they are statements from CPA as a whole. As such, they have continued our Association's fifty-year-old tradition of helping the decision makers plan for sustainable growth within the limits of Santa Barbara's resources.

So, we thought it would be helpful to summarize CPA's input on Plan Santa Barbara as it stands today. First of all, we want to express our appreciation to staff for their hard work on Plan Santa Barbara. It is obvious that staff has attempted to be comprehensive in addressing a very large number of planning issues. In particular, we acknowledge the diligence with which thousands of pages of documents have been produced and disseminated, and hundreds of questions from the community have been answered before, at, and since the successful March 18th Open House.

Last but not least, we were pleased that staff has agreed to devote a separate Element to Historic Resources. We trust that this Element will be written in the spirit of the following Sustainability Principle, formulated on p. 25 of the Draft General Plan (March 2010):

> "Historic resources and the small town character of Santa Barbara need to be protected both downtown and in the neighborhoods by preserving, maintaining and re-using historic structures, and by preserving and enhancing: the human scale of architecture; public open space; landscaping; neighborhood-serving commercial uses; and public views."

We realize that Plan Santa Barbara is still a work in progress. Our comments below are intended to reflect the direction of pertinent discussions to date and should be considered provisional. They address (A) areas where significant improvements over existing policies have been proposed and widely agreed upon, and (B) areas where there is still room for improvement and more work needs to be done.

A. Significant Improvements over Existing Policies:

A-1. We support changing the basis for the **Variable Density Ordinance** from bedroom count to unit size -- provided that the 1,000 square foot average and the existing density limits prevail.

A-2. We recognize the need to improve the jobs/housing balance. In particular, we support increasing the **inclusionary percentage** of workforce housing from 15% to 25% and codifying even greater **discretionary bonus densities** (between 50% and 100%) for rental and/or employer-subsidized residential developments. Given that such policies would result in a significant increase in density, we suggest using a three-year trial period to assess their impact and starting the experiment with the highest base density for commercial and multifamily zones to be set at the so-called Medium High Density of 15 to 27 dwelling units per acre. (See related comments below under B-1.)

A-3. We applaud staff's developing a "hybrid" scenario of carefully selected features from all four scenarios considered so far (Plan Santa Barbara, No Project Alternative, Lower Growth Alternative, and Additional Housing Alternative). We believe widespread community support could emerge for the choice of a **hybrid scenario** along the following lines:

- New nonresidential development of 1,000,000 square feet,
- New residential development of 2,800 dwelling units,
- Variable Density with affordability bonuses as outlined above,
- Selected Travel Demand Management policies on a two-year trial basis,
- Historic preservation in keeping with existing City ordinances and policies, as well as with the Secretary of the Interior's standards and guidelines, and
- An Adaptive Management Program that triggers a reduction in projected growth whenever shortfalls occur in the corresponding availability of natural, infrastructural, or financial resources.

B. Recommendations for Further Improvement:

B-1. We are concerned about the potential community impacts from up-zoning large commercial and multifamily areas to the **High Density limit** of 27 to 45 units per acre recently embraced by the majority of the Planning Commission. Further analysis is required to assess the impacts when bonus densities of up to 100% are added to this already high density baseline. For example, with a 25% inclusionary requirement, such a baseline could result in mostly market-rate condominium developments with 56 (45 + 11) units-per-acre. And the same baseline could yield the respective total per-acre units of 67 (45 + 22) or even 90 (45 + 45) units- per-acre whenever a 50% or 100% rental or employer-subsidized housing incentive is added.

We recommend, as stated in A-2 above, that Plan Santa Barbara embark on a three-year trial using the Medium High Density of 15 to 27 units-per-acre limit with mandatory density bonuses of 25% for inclusionary workforce housing and up to 100% discretionary bonus density for rental or employer subsidized housing. This trial period, in conjunction with other traffic and parking related programs, would provide staff and decision makers with an opportunity to study the actual impacts of increased density and report back to the community on the results of the trial.

B-2. Out of concern for the health and safety of Santa Barbara residents, we would like to see staff re-evaluate the **setback requirements** from major roadways. The California Air Resources Board urges a 500-foot minimum setback from freeways such as Highway 101, and the Santa Barbara County Air Pollution Control District has recommended that the city comply with the state guidelines. An increasing number of scientific studies have suggested potential links between traffic-generated air pollution and the health of people residing near traffic corridors with 10,000 Average Daily Trips. Plan Santa Barbara as currently written would allow new residential developments to be permitted without adequate setbacks from air pollution generated by heavy traffic.

We recommend that new residential developments observe a 500-foot distance from Highway 101 and that all new residential developments in the city be required to help protect residents from excessive air pollution with generously landscaped and appropriate setbacks.

B-3. With respect to preserving our quality of life in Santa Barbara, we still believe that some **consultants' projections** could benefit from further analysis. These include, but are not limited to: home building costs, "necessary" developer profit margins, trip generation figures, and congestion forecasts based primarily on PM peak hour traffic at selected intersections (rather than on around-the-clock, mid-block conditions prevailing downtown and on Upper State Street). Some of these projections provide the basis upon which many of Plan Santa Barbara's policy preferences are based.

We recommend that staff and decision makers review the community's feedback and reevaluate various consultant reports (e.g. the Santa Barbara Development Feasibility Study and the Travel Demand Model) in light of the public discussion.

B-4. The Draft Environmental Impact Report identifies some innovative **mitigations**. However, some proposed mitigation measures for the impacts of growth might have adverse impacts of their own. For example, the costs of living in Santa Barbara would significantly increase if the city finds it necessary to implement such measures as desalination, technological improvements in water recycling and solid waste disposal, as well as enhanced fire and police protection.

We recommend, as stated in A-3 above with respect to the Adaptive Management Program, that decisions about growth-inducing policies be directly tied to the City's ability to fund and enforce mandatory mitigations.

B-5. Features of Plan Santa Barbara which could benefit from more focused attention include **adaptive re-use** and the unintended impacts of **incentivizing second units**. Further consideration for ways to encourage adaptive re-use instead of demolitions could save energy and other natural resources while reducing waste and pollution. Encouraging second units required improved analysis of the potential effects they could have on: the availability of open space, traffic congestion, and increasingly crowded on-street parking in the affected neighborhoods.

We recommend that Plan Santa Barbara safeguard the character of single-family neighborhoods and avoid transforming them into de-facto duplex zones without careful consideration of the tradeoffs.

Thank you again for the years of research and information sharing which helped to get Plan Santa Barbara to where it is today. We eagerly look forward to working with the City to forge the best Plan Santa Barbara possible and then to see it carried out.